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REPORT TO THE CONGRESS



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Further Improvement Needed In Assisting Military Personnel In Finding Adequate Housing Near Bases

B-133102

Department of Defense

BY THE COMPTROLLER GENERAL
OF THE UNITED STATES

096334

JUNE 12, 1973

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COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-133102

To the President of the Senate and the
Speaker of the House of Representatives

We are reporting on the need for further improvement in assisting military personnel in finding adequate housing near bases to which they are assigned.

We made our review pursuant to the Budget and Accounting Act, 1921 (31 U.S.C. 53), and the Accounting and Auditing Act of 1950 (31 U.S.C. 67).

Copies of this report are being sent to the Director, Office of Management and Budget, and to the Secretary of Defense.

A handwritten signature in black ink, reading "James B. Stacks".

Comptroller General
of the United States

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ABBREVIATIONS

AFB	Air Force Base
GAO	General Accounting Office
DOD	Department of Defense
HRO	Housing Referral Office

COMPTROLLER GENERAL'S
REPORT TO THE CONGRESS

FURTHER IMPROVEMENT NEEDED IN
ASSISTING MILITARY PERSONNEL IN
FINDING ADEQUATE HOUSING NEAR BASES
Department of Defense
B-133102

D I G E S T

WHY THE REVIEW WAS MADE

In July 1967 the Department of Defense (DOD) established Housing Referral Offices (HROs) at military bases to promote its policy of relying on nearby communities as a primary source of family housing for military personnel. The HROs were to assist such personnel, as well as DOD civilian employees, in locating adequate, suitable, economical, and nondiscriminatory off-base housing near their duty stations.

In this initial review of the program, GAO sought to learn how effectively the HROs were achieving their purposes.

FINDINGS AND CONCLUSIONS

Although required to do so, many incoming military personnel were not reporting to the base HROs. This precluded HROs from providing valuable centralized information on availability of onbase housing and the type and cost of available private housing. (See p. 6.)

At some bases, reports prepared from HRO records were not timely, accurate, reliable, or complete. Therefore, it was not feasible for GAO or agency officials to evaluate HROs' effectiveness. (See p. 10.)

Although reported cases of racial discrimination in offbase housing were few, GAO found several instances where house hunters felt they had been rejected because of race but did not lodge a formal complaint for a variety of reasons.

One reason given to GAO by persons involved was that they were not aware of procedures to follow. Another was that, since the discrimination was subtle, it would be difficult to prove. The problem, therefore, may not be as minor as the few reported cases seem to suggest. (See pp. 13 and 17.)

DOD requires landlords to give written assurances that they will rent to all military personnel without regard to race, creed, color, or national origin. Of 17 installations checked, GAO found that only 6 had current and adequate landlord "assurances" on file. Some military personnel have entered into rental or sales agreements for units which are supposed to be officially restricted because of landlords' failure to furnish the assurances. (See pp. 19 and 20.)

Most HROs reviewed seemed to be meeting the requirement of coordinating and centralizing their activities, when possible, with other HROs in the same general area to avoid duplicating activities. Potential

existed, however, for further centralization in the San Francisco Bay area of California. (See p. 23.)

As a result of GAO's bringing this to the attention of officials at various installations in the San Francisco area, preliminary actions have been taken to form a joint field team in the East Bay area of San Francisco. (See p. 27.)

RECOMMENDATIONS

The Secretary of Defense should take steps to insure that:

- Nondiscrimination assurances are obtained from owners and landlords. (See p. 21.)
- Maximum coordination among HROs in metropolitan areas is attained. (See p. 27.)

AGENCY ACTIONS AND UNRESOLVED ISSUES

DOD agreed that HRO operations could be improved and cited action taken or planned to accomplish objectives in GAO's recommendations.

GAO met with agency officials and learned that subsequent actions, such as revising reporting-in procedures and giving more attention to intensive management, should alleviate the problem of personnel failing to process through the HRO. (See p. 8.)

DOD said procedures for recording and reporting HRO operations had been strengthened since GAO's review. A directive is being revised and it addresses the recommendations. (See p. 12.)

DOD said its instruction on equal opportunity in housing placed increased emphasis on GAO's suggestion that HROs provide greater assurance that alleged cases of discrimination will be promptly and thoroughly investigated. GAO believes proper implementation of the instruction should correct delays in investigating complaints. However, GAO feels that some cases of apparent discrimination may continue to be unreported for one reason or another and increased attention should be given to interviewing minority personnel to identify such problems. (See p. 17.)

DOD said the military departments were notified of deficiencies GAO found in DOD's policy requiring signed nondiscrimination assurances from owners and landlords and that DOD plans to revise Instruction 4165.51 to provide for a periodic review of written assurances to insure they are current and correct. (See p. 21.)

DOD agreed with GAO's suggestion to monitor the East Bay joint field team effort and said that efforts thus far are encouraging. DOD intends to apply this concept in other metropolitan areas, if it is successful. (See p. 27.)

MATTERS FOR CONSIDERATION BY THE CONGRESS

This information-type report is being issued to apprise the Congress on the progress made in this area of widespread interest and identifies the improvements still required.

CHAPTER 1

INTRODUCTION

In the past, assisting military personnel in obtaining offbase housing was a function of an installation's housing or billeting office. Frequently, however, the installation did not sufficiently emphasize this type of service. As a result military families not only experienced difficulty in obtaining housing but in many cases were dissatisfied with it. Recognizing the need for a personalized and conveniently available service to assist military personnel in locating suitable housing within the community, the Secretary of Defense in July 1967 directed the establishment of Housing Referral Offices (HROs) at military installations having more than 500 military personnel. These offices were established to assist military personnel and certain Department of Defense (DOD) civilian employees in locating adequate, suitable, economical, and nondiscriminatory offbase housing within reasonable proximity of their duty stations.

DOD's policy is to rely on communities near military installations as primary sources of housing for military personnel. Housing is to be provided for all military personnel regardless of race, color, creed, or national origin.

In March 1968 interim guidance for establishing HROs was provided to installations and commands; and, in November 1968 DOD Instruction 4165.51, "Housing Referral Offices and Services," formalized these guidelines, setting forth the objectives of the program. In 1971 this instruction was amended to provide civilian employees with the same services provided military personnel.

As of December 31, 1971, there were 339 HROs in the United States. For fiscal year 1972, the estimated cost to operate these offices was about \$8.8 million and the estimated manpower strength was 1,100 military and civilian personnel.

HRO FUNCTIONS

HROs are responsible for securing a maximum number of listings of housing units suitable for occupancy by military personnel and available on a nondiscriminatory basis. Such

listings are compiled through real estate interests in the community and through other Government agencies. HROs are required to inspect property submitted for listing if there is any question regarding its suitability.

Listings are required to be documented with a written assurance from the owner, manager, or agent that the property is available for occupancy by all military personnel regardless of race, creed, color, or national origin. If a written assurance is not obtainable but the owner, manager, or agent asserts that he follows a nondiscriminatory policy, the property may still be listed if the installation commander or his designee provides a signed statement of the oral assurance received.

When the owner, manager, or agent of a property has refused or failed to provide an assurance of nondiscrimination in rental policy, the property is officially "sanctioned" and military personnel are not authorized to enter into a rental or sales agreement for the restricted property.

Military personnel looking for offbase housing are to report to the applicable HRO before making a commitment. This procedure enables the individual to take advantage of HRO counseling and to receive assistance in finding the housing of his choice. It also enables the HRO to provide him with a listing of the housing units which have been sanctioned and may not be occupied.

The HRO is to assist the individual by providing general information on the area where he prefers to live. He is to be advised of DOD policy concerning offbase housing and is requested to report any discrimination or other complaints relating to his attempts to locate housing. This should enable the HRO to evaluate the effectiveness of the program and establish whether owners, managers, or agents are honoring their assurances of nondiscriminatory policies. Any complaints received are to be promptly investigated for validity.

JOINT OR COORDINATED HROs

In geographic areas having a number of DOD installations, an appropriate determination must be made regarding the feasibility of operating under a single (joint) HRO serving all installations in the area or operating coordinated offices wherein one installation may be designated as central coordinator. In coordinated areas each installation is responsible for providing referral services.

CHAPTER 2

PROGRAM EFFECTIVENESS IMPAIRED

Substantial numbers of persons arriving on base were not reporting to the HRO for assistance. As a result, HROs were precluded from disseminating valuable centralized information on the availability of onbase and offbase housing and from providing other related services.

The results of our review of personnel arriving at selected installations during a 1-month period in 1971 are summarized below.

Personnel Arrivals at Selected
Installations During a 1-Month Period in 1971

<u>Installations</u>	<u>Time period</u>	<u>Personnel</u>		
		<u>Total number</u>	<u>Reporting to HRO</u>	<u>Percentage not reporting to HRO</u>
<u>Army:</u>				
Fort Dix, New Jersey	July 1971	^a 47	26	45
Fort Lewis, Washington		340	76	78
Fort Sam Houston, Texas	^b July 1971	590	117	80
<u>Navy:</u>				
Naval Air Station, Alameda, California	July 1971	37	37	0
Naval Communications Station, San Diego	July 1971	26	3	88
Naval Station, San Diego	July 1971	70	5	93
Naval Training Center, San Diego	July 1971	143	13	91
<u>Air Force:</u>				
Lackland Air Force Base (AFB), Texas	Aug. 1971	275	197	28
McChord AFB, Washington	Jan. thru Aug. 1971	^c 124	81	35
McGuire AFB, New Jersey	May thru Aug. 1971	^d 233	128	45
Travis AFB, California	July 1971	274	274	0

^aBased on a sample taken from the July 1971 payroll list.

^bBased on a sample of the personnel rosters of the 15th Support Brigade showing personnel living off post.

^cRandom sample of personnel reporting during this period.

^dIncludes an unknown number of individuals who were commuting from their residences before entering the Air Force and who would not be required to report to the HRO. We were told this figure could be from 60 to 80 percent.

The DOD instruction regarding HROs requires that, to provide maximum assistance, procedures be established to process military personnel through the appropriate HROs before they execute commitments for private housing. In this manner, personnel can be provided centralized information on availability of public quarters and on the types and costs of available private rental housing, as well as information on schools, shopping, and other community services. Additionally, they can be provided with a listing of facilities restricted because of segregation practices or the landlord's refusal to give assurance of nondiscriminatory rental policy. Personnel are advised to report to the HRO within 10 duty days on their efforts to locate housing. A postage-paid, preaddressed form is provided for this purpose. Each of the military departments has issued implementing instructions.

Army

The Army regulation provides that procedures will be established whereby all military personnel authorized to occupy and requiring offbase housing will process through the HRO. The following examples show that this regulation was not being implemented effectively.

At Fort Sam Houston temporary-duty personnel were generally not reporting to the HRO. Many of these people were students in training courses of more than 30 days' duration--a category that should process through the HRO according to the Army regulation.

At Fort Lewis controls to monitor whether personnel reported to the HRO were inadequate. Some personnel offices listed HROs on their check-in sheets, while other offices omitted them.

Navy

None of the Navy installations we reviewed required incoming personnel to report to the HRO.

Air Force

Travis AFB and Lackland AFB required incoming personnel to process through the HRO. At Travis AFB compliance was

excellent, whereas at Lackland AFB a number of students reporting for temporary duty failed to report to the HRO. Officials at Lackland AFB corrected the procedural weakness when we called it to their attention. The other two AFBs included in our review did not have control procedures to insure that incoming personnel process through the HRO.

DOD APPRISED OF THE PROBLEM

In the fall of 1971 we informally advised officials in the Office of the Assistant Secretary of Defense (Installations and Logistics) that a significant number of personnel were not processing through HROs. We mentioned that at some bases the HRO was included as a check-in stop for newly arrived personnel and suggested that the problem be explored within the military departments.

CONCLUSIONS

A significant number of military personnel required to report to HROs before looking for and/or obtaining community housing are bypassing them. This precludes HROs from disseminating valuable centralized information on the availability of onbase housing and the types and cost of available private housing. It also prevents them from providing related services incident to buying or leasing private housing. Therefore, HROs are unable to help families who fail to report to secure suitable housing. Obviously, the procedures which were in effect at the time of our review and which required that all military personnel report to their respective HROs prior to making commitments for offbase housing, were ineffective and needed strengthening.

We discussed the failure of incoming military personnel to check in with the HRO in a draft of this report to DOD. Subsequently, we met with military department representatives to obtain information regarding their efforts to remedy this situation. Summarized below are steps the military departments had taken to process personnel through HROs since completion of our fieldwork.

Army

Procedures for processing new arrivals at a base now include specific steps for having personnel process through the HROs. The Army Inspector General will include in his inspections a check on installations' procedures for insuring that personnel process through the HRO. Personnel's failures to report to HROs have been publicized in an Army newsletter distributed to middle management.

Navy

The Navy is currently reemphasizing the mandatory requirement for Navy personnel to process through the HRO before obtaining offbase housing. A letter from the Office of the Chief of Naval Operations to all Housing Area Coordinators stressed the need to enforce requirements that all personnel moving into the area process through the HRO.

A letter from the Deputy Chief of Naval Operations (Manpower and Naval Reserve) to commanding officers of all Navy units emphasized commanders' responsibilities in insuring that all personnel check in with the appropriate HRO.

The Navy is preparing a communication which will require that the Naval Inspector General include a review of the local policies and procedures for insuring commanding officers' compliance with the HRO contact requirement.

Air Force

The Air Force was revising its regulations to highlight and strengthen the procedure requiring personnel to process through the HRO. Regulations will stipulate that all personnel requiring offbase housing are required to report to the HRO prior to entering into a commitment.

These steps by the military departments should insure that personnel needing housing are using HRO services to obtain housing. We plan to check the effectiveness of the new procedures at a later date.

CHAPTER 3

NEED FOR IMPROVING DOCUMENTATION SUPPORTING HRO REPORTING

DOD housing referral instructions require the military headquarters to obtain and maintain appropriate information from each of their installations operating an HRO so that the services can measure the progress, usage, and effectiveness of HROs. DD Form 1656 was devised for this purpose and the DOD instructions also prescribe certain supporting or source documents for it. These are the Off-Base Housing Application (DD Form 1668) and the Notification of Housing Selection (DD Form 1670). A brief description of the deficiencies observed in these records at selected Army, Navy, and Air Force installations follows.

ARMY

Fort Sam Houston

The HRO records were so incomplete that we could not use them to evaluate the effectiveness of the housing referral program. HRO did not consistently use the required forms to record information relating to housing applications and selection. Instead it was using a DOD questionnaire, employed in annual surveys of family housing requirements, to obtain information on personnel processed by the HRO. Our review of the 244 questionnaires dated July 1971 showed that they were not adequate for obtaining information on housing referral operations which the regular HRO forms require.

Fort Dix

Our review of DD Form 1656, for the quarter ended June 30, 1971, disclosed that:

1. Supporting documentation was not available for the reported number of personnel who obtained rental or sales housing through the HRO and those who did not.

2. Records of the number of personnel requesting HRO assistance, those not requesting assistance, and the number of complaints reported by military personnel and owner/agent/managers were inaccurate.

NAVY

At Puget Sound Naval Shipyard, the HRO records did not substantiate the quarterly DD Form 1656 for calendar year 1970 and the first and second quarter of calendar year 1971.

AIR FORCE BASES

At four AFBs (Dover, Lackland, McGuire, and Travis), we were unable to verify, for the most part, the data on DD Form 1656 because the HROs did not retain supporting documentation.

For example, at Lackland AFB all offbase housing applications dated prior to June 1971 had been destroyed in accordance with local interpretation of the then-existing instruction which authorized the disposal of housing records " * * * when obsolete or no longer needed." The Air Force instruction was revised in April 1971 requiring these forms to be retained for 1 year, but the revision was not received at Lackland AFB until June 1971.

An HRO official stated that, once the DD Form 1656 had been completed, the application forms were considered obsolete and no longer needed. However, destroying these forms eliminated the only record of the military personnel who had received the list of sanctioned housing facilities. Therefore, it would be difficult to determine whether military personnel found residing in sanctioned housing had been informed of the restriction. Without evidence of the receipt of the sanctioned housing list, compliance with the policy regarding sanctioned housing would be virtually impossible.

CONCLUSIONS

The inadequacies of the documentation supporting HROs' activities preclude, in our opinion, an intelligent evaluation of the effectiveness of the HROs in placing military

personnel in suitable offbase housing. The very purpose for which these documents were devised is, therefore, defeated. The basic problem, as we see it, was the failure of individual HROs to control the prescribed system of recording and reporting to insure maximum compliance with the system by HRO personnel and users of HRO services.

Since the conditions noted occurred at several installations, it is likely that they may be sufficiently prevalent throughout the military services to warrant further inquiry and corrective action.

AGENCY COMMENTS AND GAO EVALUATION

In our draft report we proposed that HROs control the prescribed system of recording and reporting HRO activities to produce accurate, complete, and reliable information. More specifically, steps would have to be taken to insure that HRO personnel and users were fully complying with the prescribed procedures.

In reply, DOD said that military departments had strengthened and reemphasized procedures for recording and reporting HRO operations since our review was completed.

The Office of the Secretary of Defense and military department headquarters representatives make periodic visits to HROs, averaging 7 to 10 different installations every 3 months, to indicate top management emphasis on the HRO program and to provide any guidance necessary. The Navy conducts quarterly HRO seminars which are open to HRO personnel of all services and which are intended to improve HRO personnel's knowledge, skills, and attitudes. HRO policies and practices are covered in each session of the Family Housing Management School held quarterly each year.

We have obtained interim documentation applicable to the above areas and have been advised by a DOD official that the instruction providing guidance for operating HROs will be revised to insure that military departments control HRO recording and reporting procedures.

We plan to review the effectiveness of the corrective actions at an appropriate time in the future.

CHAPTER 4

INCIDENCE OF ALLEGED DISCRIMINATION

IN COMMUNITY HOUSING

INSTANCES OF UNREPORTED
CASES OF ALLEGED DISCRIMINATION

The following schedule of our interviews shows that some minority service personnel and their families believed they encountered racial discrimination while looking for offbase housing.

<u>Installation</u>	<u>Interviews held</u>			<u>Apparent cases of discrimination not formally reported</u>		
	<u>Total</u>	<u>Minority members</u>	<u>Caucasian members</u>	<u>Total</u>	<u>Racial</u>	<u>Other type</u>
Fort Sam Hous- ton	50	30	20	11	6	5
Lackland AFB	50	30	20	0	0	0
Fort Dix	36	18	18	6	2	4
McGuire AFB	19	12	7	3	2	1
Dover AFB	28	14	14	4	2	2
San Diego Na- val Station	75	46	29	11	6	5
Travis AFB	52	31	21	44	10	^a 34
Alameda Naval Air Station	66	49	17	63	12	^b 51
Fort Lewis	137	58	79	17	6	11
Puget Sound Naval Ship- yard	59	32	27	4	1	3
McChord AFB	<u>145</u>	<u>32</u>	<u>113</u>	<u>3</u>	<u>1</u>	<u>2</u>
Total	<u>717</u>	<u>352</u>	<u>365</u>	<u>166</u>	<u>48</u>	<u>118</u>

^a28 of these felt discriminated against because of high rent.

^b36 of these felt discriminated against because of high rent.

Forty-eight individuals felt they had been discriminated against in their search for housing because of race.

Our interviews were made on a test basis and generally involved persons who processed through the HROs between January and August 1971. By contrast, we noted that only 32 reported and documented cases of alleged discrimination at the above installations since inception of the HROs in 1968. At three of the HROs we were informed that, in some cases, complaints were resolved internally and not recorded.

A black, noncommissioned officer said that he went to a rental unit to inquire about an apartment and was told that there were no vacancies. Three days later his white friend went to the same rental unit and rented an apartment. When asked why he failed to report this incident to the HRO, he replied that he had no evidence to support his feeling of being discriminated against. We made no attempt to investigate any of the instances of alleged discrimination made in our interviews and are unable to determine what portion may be valid. We recognize that many may be determined to be invalid upon investigation, however, we believe that all potential cases should be investigated to preclude overlooking a valid case.

According to the personnel interviewed, some of these cases were not being reported to the proper authorities because minority personnel were not sure that they actually encountered racial discrimination since it was subtle; they felt that such cases would be difficult to prove. In other cases personnel informed us they were unaware of the procedures for reporting apparent discrimination. Minority personnel may be reluctant, for personal reasons, to report such incidents through official channels of communication.

We were informed of 118 cases of apparent discrimination which were not racial, e.g., for family size or just for being military personnel.

An Air Force chaplain told us that, in his opinion, many black personnel would be hesitant to file a housing racial discrimination complaint with the HRO because they (1) do not want to get involved, (2) accept racial discrimination as a way of life, or (3) may not be aware of available HRO assistance. He told us that he personally receives about one complaint of racial discrimination a month from personnel who do not want to report the matter to the HRO.

EXCESSIVE TIME LAPSE BEFORE INVESTIGATION
OF CASES AT FORT SAM HOUSTON

DOD requires that all complaints or reports of alleged discrimination be investigated promptly, thoroughly, and impartially by the HRO and adjudicated when possible. At Fort Sam Houston 4 to 12 weeks were allowed to elapse before an investigation was initiated on three documented cases. In our opinion, these delays are unreasonable and the action taken in one case was inadequate.

Army Regulation 210-51 directs immediate investigation of complaints relating to offbase housing problems regardless of their nature. Complaints involving racial discrimination are to be disposed of in accordance with the provisions of the Fair Housing Enforcement Program (Army Regulation 600-4). Army Regulation 600-4 requires that all investigative action at the installation level be completed within 20 days.

Two of the alleged racial discrimination complaints were submitted in writing to the HRO on December 7, 1970, and February 4, 1971, and were promptly forwarded to the equal opportunity office of the Directorate of Personnel and Community Activity. There was no indication that either the equal opportunity officer or the HRO made any attempt to investigate the two complaints before March 9, 1971. The housing referral officer explained that the delay was caused by disagreement as to whether the housing referral officer or the equal opportunity officer was responsible for investigating racial discrimination complaints. This disagreement was resolved with the publication of a Fort Sam Houston supplement to Army Regulation 600-4, dated March 9, 1971, which directed the HRO to administer the Fair Housing Enforcement Program.

The following is a summary of the three documented instances of alleged discrimination and the action taken by the HRO. None of these complaints was filed on Housing and Urban Development Form 903, Housing Discrimination Complaint. The form was devised by the Department of Housing and Urban Development which has Government-wide responsibility for investigating cases of this nature.

1. On December 7, 1970, the HRO received a written complaint from a Caucasian alleging that a land developer's

closing documents included a membership clause interpreted by the sales representative to mean that the developer would not sell to blacks. The Housing referral officer advised us that the investigation was delayed, as explained above, for approximately 3 months. He said that when the investigation was finally initiated, the developer's former sales representative said that the land developer's organization no longer existed; no further action was taken.

2. On December 15, 1970, the HRO received a complaint alleging that the owner of a multiunit rental facility advised the complainant, a Caucasian, that black visitors were not permitted on the premises. The HRO did not complete its investigation until after March 30, 1971. When the investigation was finally initiated, no action was taken because the facility consisted of only four rental units.

Army Regulation 600-18, Equal Opportunity for Military Personnel in Off-Post Housing, provides that assurances of nondiscriminatory rental policy will be obtained from managers or owners of all apartment and/or trailer court facilities having five or more rental units. The HRO took the position that since this facility had fewer than five rental units and was not listed with the HRO, an assurance of nondiscriminatory rental policy was not required from the owner and therefore the facility was not sanctioned.

On August 24, 1971, we called the housing referral officer's attention to the provision of Army Regulation 600-18 which requires that the installation commander impose sanctions against any rental facility, including single-family units and multiunit facilities with fewer than five units, whose owner is found to discriminate against military personnel. The HRO subsequently obtained a signed nondiscrimination assurance from the owner.

3. On February 4, 1971, the HRO received a written complaint from three Army lieutenants that an apartment complex had refused to rent them an apartment for multiple occupancy because one man was black. The housing referral officer said that the investigation of this complaint was delayed until after March 9, 1971. A new nondiscrimination assurance was obtained on March 23, 1971, from the apartment owner. The housing referral officer said that the apartment manager had assured him that in the future there would

be no more discrimination because one or more persons of a group desiring to rent an apartment was black.

CONCLUSION

The incidence of alleged discrimination which came to our attention through personal interviews creates some doubt in our mind that the problem is as minor as the few documented cases seem to suggest. It is important, therefore, that every effort be made to identify the nature and extent of this problem and that appropriate measures be adopted to correct it.

AGENCY COMMENTS AND GAO EVALUATION

In our draft report we proposed that

- HROs be required to provide greater assurance to users that alleged cases of racial discrimination will be promptly and thoroughly investigated and appropriate action taken against violators,
- better dissemination of the procedures for reporting apparent discrimination was needed,
- users need greater assurance that incidents can be freely reported through official channels of communication, and
- consideration should be given to having HROs make special efforts, through interviews with minority personnel or other means deemed appropriate, to identify problems being encountered by these people.

These special efforts should facilitate corrective action.

DOD commented that Instruction 1100.16, "Equal Opportunity in Housing" was being revised to deal with our recommendation. The revised instruction, requiring that HROs investigate discrimination complaints within 3 working days after receiving them, was reissued on February 28, 1973. This revision, along with the proposed revision to Instruction 4165.51, should result in prompt investigation of complaints, better understanding of procedures, and more confidence that incidents can be freely reported.

The revisions to the pertinent DOD instructions, if properly implemented, should improve the reporting and investigation of complaints of alleged discrimination. We believe, however, that there may continue to be similar problems which are not reported for one reason or another and therefore cannot be resolved. DOD may wish to consider having HROs interview minority personnel on a selective basis to identify such problems.

CHAPTER 5

NEED FOR INCREASED EMPHASIS ON OBTAINING WRITTEN ASSURANCE OF OPEN HOUSING POLICY FROM LANDLORDS AND RELATED MATTERS

DOD requires landlords to give written assurance that they will rent to all military personnel without regard to race, creed, color, or national origin. If landlords refuse to sign such a statement, their housing is sanctioned to military personnel.

The housing referral officer is required to obtain the assurance when the property is being listed. Alternatively a statement, signed by the installation commander or his designee, is required to confirm that the landlord explicitly assured the HRO that his housing is available to military personnel without discrimination. The HRO must keep the written assurance on file.

As further discussed below, compliance with the DOD requirements was spotty.

NEED FOR UPDATING ASSURANCES

Of 17 installations checked, only 6 had current and adequate assurances on file in support of their housing listings; the remaining installations had varying degrees of deficiencies in their files. For example, some had only a few listings not supported by written assurances whereas others had a significant number or had assurances which needed updating because they were signed previously by owners who had subsequently sold the property. DOD requires that assurances be checked for accuracy and currentness.

Naval Air Station, Alameda

The HRO at Naval Air Station, Alameda, maintains a list of about 1,600 apartment complexes of five or more units.

These units were surveyed in the initial census in 1967. The HRO had no record of assurances which may have been received at that time. Only 57 nondiscrimination assurances were on file at July 14, 1971. The HRO staff advised us that some owners and landlords are reluctant to sign a nondiscrimination pledge. In those cases, the HRO representative annotates the records that the owner or landlord has given oral assurance of nondiscrimination.

During July 1971 the HRO staff began mailing letters to each of the approximately 1,600 complexes describing the HRO's functions, soliciting vacancy listings, and requesting the return of a signed nondiscrimination form. The mailing was expected to take about 9 weeks.

Naval Station, Treasure Island

At the Naval Station, Treasure Island, we were told that many landlords will not sign the nondiscrimination forms but they do orally agree not to discriminate. This oral assurance is recorded.

CONTINUED OCCUPANCY OF SANCTIONED HOUSING

Army Regulation 600-18 provides that sanctions will be imposed against apartment and/or trailer court facilities with five or more rental units when written assurance cannot be obtained from the facility's manager or owner. Army Regulation 210-51 specifies that military personnel should not enter into rental or lease agreements with any sanctioned facility.

At the time of our review, five housing facilities in the San Antonio area were sanctioned. We found that at least seven Army personnel assigned to Fort Sam Houston were residing in these facilities.

As a result of our bringing this information to the attention of HRO officials, Fort Sam Houston submitted a request to the Commanding General, 5th U.S. Army, for guidance as to handling the current and future instances of military personnel found to be residing in sanctioned facilities. The regulations provided no guidance for resolving this type of situation.

In February 1973 DOD Instruction 1100.16 "Equal Opportunity in Off-Base Housing" was reissued. This instruction purports to prohibit military personnel from residing in sanctioned facilities. The restriction does not apply, however, to personnel who may be residing in a facility at the time it is sanctioned nor does it apply to extensions, renewals, or modifications of a rental or lease agreement entered into prior to imposition of the restriction. We were informed that the rationale for this exception was that DOD did not wish to disrupt a family residing in such a facility by causing a move. It believed that normal rotation policy would eventually correct the situation.

CONCLUSIONS

HROs must increase their efforts to make certain that written assurances of nondiscrimination are being obtained from landlords. It is essential to the success of the program that the sanction list be current and reflect the actual situation.

With respect to continued occupancy of sanctioned housing, we agree that the normal rotation policy should ultimately correct this situation and we have no further recommendation at this time. However, the matter should be reviewed periodically to insure improvement.

RECOMMENDATION

The Secretary of Defense should strengthen compliance with DOD's policy to require signed nondiscrimination assurances from owners and landlords at installations deficient in this respect. He should consider implementing a periodic review or reporting procedure to insure that every effort is made to have on file the signed nondiscrimination forms.

AGENCY COMMENTS AND GAO EVALUATION

DOD commented that a memorandum to the military departments was being sent pointing out the deficiencies we found in our review and the need to insure compliance with DOD policy regarding the obtaining of nondiscriminatory assurances from landlords and owners.

We have obtained a copy of the memorandum, dated December 27, 1972, which requests that installation commanders be directed to insure that all HRO listings are current and adequate and are supported by signed assurances. The memorandum also states that DOD plans to revise Instruction 4165.51 to provide for a periodic review of written assurances to insure that they are current and correct.

CHAPTER 6

POTENTIAL FOR CENTRALIZING HRO FUNCTIONS

IN SAN FRANCISCO BAY AREA

One of the HRO program objectives is to avoid duplicating and overlapping effort where two or more installations are located in the same general area and draw upon the same community support.

We evaluated the HROs' effectiveness by the above HRO objective, particularly considering the potential benefits of further centralization. Generally, the HROs are responsible for a geographical area surrounding the particular installation served. It appeared that in the vicinity of San Antonio, San Diego, Seattle, and Trenton the HROs were satisfactorily coordinating and that further centralization was not warranted. Potential existed, however, for further centralization in the San Francisco Bay area.

SAN FRANCISCO BAY AREA

During 1967 the commandant, 12th Naval District, was appointed the Housing Referral Coordinator for the San Francisco Bay area. As coordinator, the commandant determined that joint HROs were not practical or suitable because of geographical dispersion and distances between installations plus the inadequate Government and commercial transportation in the San Francisco Bay area. This decision was approved at the Washington level. Nine HROs were established in the San Francisco Bay area and each installation commander was given responsibility for contacting landlords and obtaining listings within his specified geographical area. Subsequently, a tenth HRO was organized at the Oakland Army Base. The 10 San Francisco Bay area offices are listed below.

- Oakland Army Base
- Presidio of San Francisco
- Naval Station, Treasure Island
- Naval Hospital, Oakland
- Naval Air Station, Alameda
- Naval Air Station, Moffett Field
- Naval Weapons Station, Concord

Naval Shipyard, Mare Island, Vallejo
Naval Shipyard, Hunters Point, San Francisco
Hamilton Air Force Base

To conduct periodic housing surveys to determine housing needs, the San Francisco Bay area has been divided into an East Bay Housing Complex and a West Bay Housing Complex. The East Bay Complex includes the Naval Hospital, Oakland; Naval Air Station, Alameda; Naval Supply Center, Oakland; and the Oakland Army Base. The West Bay Complex includes the Naval Station, Treasure Island; Hunters Point Naval Shipyard, San Francisco; and the Presidio of San Francisco. These locations are shown on the map on page 25.

OPPORTUNITY TO IMPROVE HOUSING
REFERRAL EFFECTIVENESS THROUGH
A JOINT FIELD TEAM - EAST BAY
COMPLEX

The HRO at Naval Air Station, Alameda, in addition to helping its own personnel find housing, provides housing referral services to the Naval Supply Center, Oakland, and the field investigation and listing service for the Naval Hospital, Oakland. In doing so, it furnishes referral listings of a specified part of the East Bay housing area. The Oakland Army Base and the Naval Station, Treasure Island, which have their own HROs, also place some of their personnel in the same area.

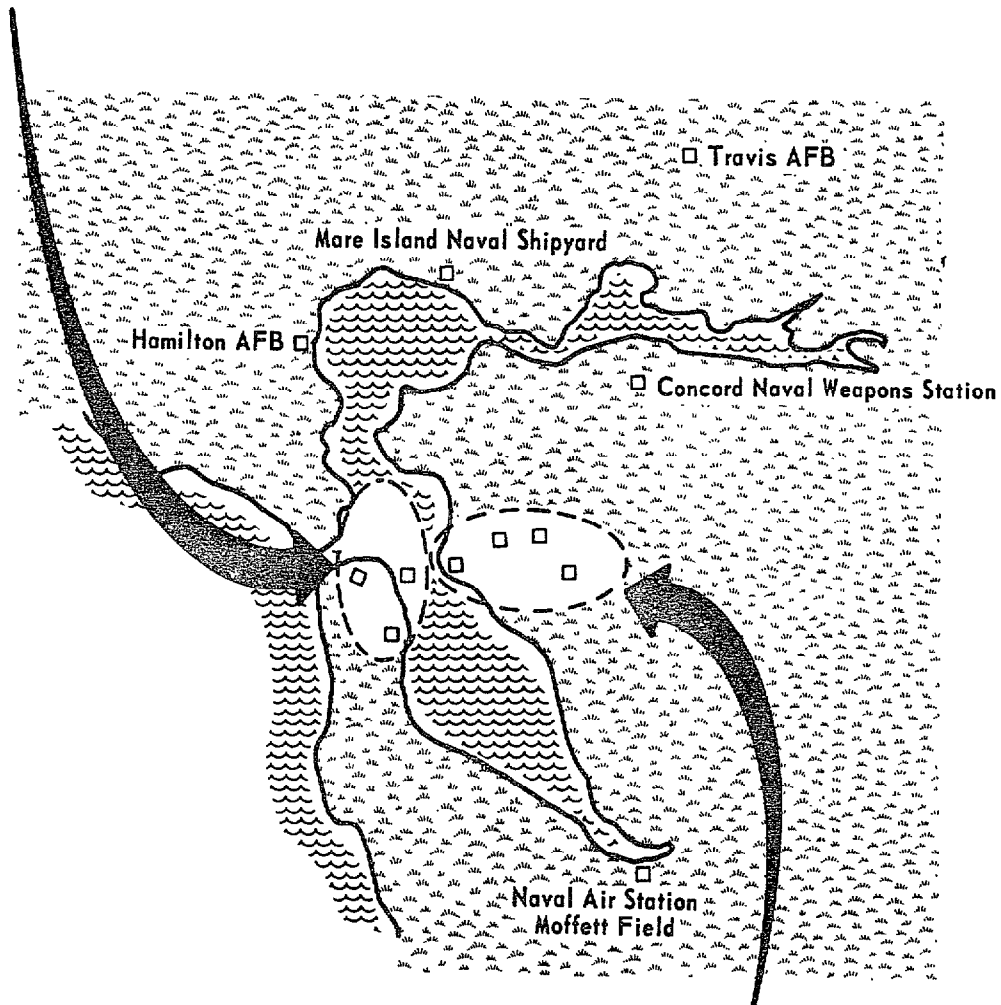
Neither the Oakland Army Base nor the Naval Station, Treasure Island, was adequately performing fieldwork or aggressively soliciting new housing listings, although officials of both installations told us that they plan to have a field man perform these functions as soon as they are fully staffed. In both cases the field personnel will be doing all or a great deal of their work in the same East Bay area. Installation officials told us that although the Naval Station, Treasure Island, is located in the West Bay area, many of its HRO users were finding their housing in the East Bay area. Thus, there is an overlap in the geographical areas of HROs in the East Bay area.

We were told that neither of the above HROs has established procedures for maintaining vacancy listings. Therefore, each member requesting assistance can require a lengthy

SAN FRANCISCO BAY REGION

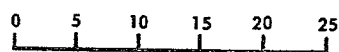
WEST BAY HOUSING COMPLEX

Naval Station
Treasure Island
Hunters Point Naval Shipyard
Presidio



EAST BAY HOUSING COMPLEX

Oakland Army Base
Naval Air Station, Alameda
Naval Supply Center, Oakland
Naval Hospital, Oakland



APPROXIMATE
GRAPHIC SCALE IN MILES

referral office effort to find suitable vacancies (price, size, location) to contact. Generally, referral office personnel contacted only those landlords who gave nondiscrimination assurances during the initial phase of the Housing Referral Program in 1967, when all offbase rental housing groups of five or more units were to be contacted. In addition, landlords who advertise vacancies in local newspapers are contacted.

In contrast, Naval Air Station, Alameda, has a procedure for contacting landlords about every 2 weeks to obtain vacancy data. Therefore, each member requiring assistance can determine the vacant units meeting his needs and contact the units by HRO telephone. The HRO staff will, however, make the contacts if the member desires.

The procedures the Oakland Army Base and Naval Station, Treasure Island, use in locating vacancies may create an impression of highly personalized service because the HRO staff makes numerous telephone calls to aid the personnel using the service. However, the Naval Air Station's HRO procedures seemed more efficient.

We discussed the practice of not maintaining vacancy listings and not having a regularly functioning field staff with officials of the Naval Station, Treasure Island; Oakland Army Base; the 12th Naval District; and the Naval Air Station, Alameda, and elicited comments on the possibility of maintaining separate referral offices with a joint field staff function. The field staff would investigate all complaints, solicit new listings, and be responsible for providing current vacancy data to each participating HRO. All of the officials believed that using a joint field team would have merit and should improve the HRO's effectiveness.

The Commanding General, Oakland Army Base, directed his staff to contact officials of the Naval Station, Treasure Island, and the Naval Air Station, Alameda, to determine whether the joint field concept could be implemented.

In addition, 12th Naval District officials said that they would look into the feasibility of using the joint field team concept among the HROs in the West Bay area.

CONCLUSION

The effectiveness of the services offered by some HROs in the San Francisco Bay area has been hampered by their lack of current listing and vacancy data. A principal cause was that all HROs were not being fully staffed. We were told that, as additional staff was hired and trained, each HRO would have a regular procedure for obtaining more listings. However, HRO personnel told us that, as a practical matter, some HROs will be looking for listings and vacancies outside their assigned specific areas. This could result in overlapping and duplication of effort.

As a result of our bringing this to the attention of officials at various military installations in the San Francisco area, preliminary action has been taken to form a joint field team in the East Bay area and consideration is being given to the possibility that a similar field team would benefit the West Bay area. The actions planned should improve the efficiency and effectiveness of HRO services and should result in some savings.

RECOMMENDATION

The Secretary of Defense should monitor the operations of the joint field team effort planned in the East Bay area. If this results in savings and more complete and useful listings of available housing, DOD should consider the joint field team concept in other metropolitan areas having similar conditions.

AGENCY COMMENTS AND GAO EVALUATION

DOD agreed with our recommendation and will continue to monitor the East Bay joint field team effort the results of which, it stated, are encouraging. If successful, DOD intends to apply this concept in all appropriate areas. We were advised that DOD plans to formulate an aggressive plan to accomplish the objectives of our recommendation.

We asked DOD to keep us informed of the progress made in applying the joint field team concept to HRO activities.

CHAPTER 7

SCOPE OF REVIEW

Our review included an examination of DOD's policies, procedures, and practices with respect to HRO operations. We made our review primarily at the following installations:

Army

Fort Dix, New Jersey
Fort Lewis, Washington
Fort Sam Houston, Texas

Navy

Naval Air Station, Alameda, California
Public Works Center, San Diego, California
Puget Sound Naval Shipyard, Washington

Air Force

Dover Air Force Base, Delaware
Lackland Air Force Base, Texas
McChord Air Force Base, Washington
McGuire Air Force Base, New Jersey
Travis Air Force Base, California

In addition, we performed a limited review, principally gathering background and operational data, at the following activities and organizations:

Oakland Army Base, California
Presidio of San Francisco, California
Naval Shipyard, Hunters Point, San Francisco, California
Naval Air Station, Lakehurst, New Jersey
Naval Hospital, Oakland, California
Naval Station, Treasure Island, California
Naval Supply Center, Oakland, California
Twelfth Naval District, Treasure Island, California
Western Division, Naval Facilities Engineering Command,
San Bruno, California
Kelly Air Force Base, San Antonio, Texas
Randolph Air Force Base, San Antonio, Texas
Department of Housing and Urban Development,
San Francisco Regional Office, California

Our work included a review of (1) HRO services, (2) required reports, (3) procedures for implementing the HRO program, and (4) HRO investigation of alleged discrimination complaints. We interviewed military personnel, who had recently processed through the HRO, and held discussions with responsible HRO officials and other related organizations at each installation.



OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE
WASHINGTON, D. C. 20301

IO

15 JAN 1973

INSTALLATIONS AND LOGISTICS

Mr. R. G. Rothwell
Associate Director
U. S. General Accounting Office
Washington, D. C. 20548

Dear Mr. Rothwell:

Reference is made to your letter of October 17, 1972, to the Secretary of Defense, which forwarded copies of the General Accounting Office (GAO) draft report on "Potential for Improvement in the Operation of Housing Referral Offices," (OSD Case No. 3537), and solicited comments thereon. Copies were also sent to the Secretaries of the Army, Navy and Air Force.

The GAO review was made to obtain an understanding of how effectively the Housing Referral Offices (HROs) were achieving the purposes for which they were established. General thoughts on the report, as a whole, as well as comments on the specific findings and recommendations therein follow.

As noted in the report, HROs were set up beginning in Fiscal Year 1968. Initially, manning was through use of military personnel; such civilian personnel, materials and other services as were needed were funded at the expense of other family housing functions. Acceptance of HROs is gradually improving, and the program is moving toward more dependence on the use of civilians in order to lower costs and improve effectiveness through continuity of manning and greater knowledge of the local community served. It is true that, as the report title indicates, there is potential for improvement in HRO operations. It is also true that HROs have been effective in finding needed housing for service personnel in local communities. In 1971, for example, over 250,000 military members were housed directly by HROs, about 71 percent of those requesting housing assistance. Constant efforts are made to improve the knowledge, skills and attitudes of HRO personnel through quarterly HRO seminars initiated by the Navy in September 1971 and open to HRO personnel of all Services. HRO policies and practices are thoroughly covered in each session of the Family Housing Management School held four times each fiscal year. Also, periodic visits to HROs, averaging seven to ten different installations every three months, are made by Office of the Secretary of Defense and Military Department headquarters representatives to indicate top management emphasis on the HRO program and to provide any guidance necessary. In summary, the Department of Defense (DoD) and the Military Departments have worked diligently toward the best possible HRO service throughout the five-year HRO history, and top management emphasis and effort are continuing in that direction.

APPENDIX I

The specific GAO recommendations are repeated below, with DoD comments immediately following each.

[See GAO note, p. 33.]

Recommendation 2. Require that HROs exercise controls over recording and reporting their activities, to produce accurate, complete, and reliable information.

Comment. Procedures for recording and reporting HRO operations have been strengthened and re-emphasized by the Military Departments since the GAO review was completed. The subject is also given particular attention in the visits, seminars and courses described earlier.

Recommendation 3. Require HROs to provide greater assurance to users that alleged cases of racial discrimination will be promptly and thoroughly investigated and appropriate action taken.

Comment. Increased emphasis is being placed on the recommendation in DoD Instruction 1100.16, "Equal Opportunity in Housing." The forthcoming revision to the instruction will require that investigations of housing discrimination complaints be initiated within three working days after receipt of the complaint by the HRO. The Military Departments are initiating this new procedure at their own initiative.

Recommendation 4. Strengthen compliance with DoD's policy to require signed nondiscrimination assurances from owners and landlords.

Comment. A memorandum will be forwarded to the Military Departments pointing out the deficiencies noted and the need to insure compliance with DoD policy regarding the obtaining of nondiscriminatory assurances from landlords and owners.

Recommendation 5. Monitor the operations of the joint field team effort planned in the East Bay area of San Francisco. If this effort is successful, DoD should consider applying the joint field team concept in other metropolitan areas.

Comment. Concur. The establishment of joint and coordinated HROs as necessary or desirable, to increase the effectiveness of these

offices, is covered in DoD Instruction 4165.51, "Housing Referral Offices and Services." DoD encourages neighboring HROs to exchange ideas and information either formally or informally. We will continue to monitor the East Bay joint field team effort, results of which so far are encouraging. If successful, this concept will be applied in all areas where it is appropriate.

Sincerely,



BARRY J. SHILLITO
Assistant Secretary of Defense
(Installations and Logistics)

GAO note: The deleted comments relate to matters discussed in the draft report but are omitted from this final report.

APPENDIX II

PRINCIPAL OFFICIALS
 RESPONSIBLE FOR THE
 ADMINISTRATION OF ACTIVITIES
 DISCUSSED IN THIS REPORT

Tenure of office	
<u>From</u>	<u>To</u>

DEPARTMENT OF DEFENSE

SECRETARY OF DEFENSE:

Elliot Richardson	Jan. 1973	Present
Melvin R. Laird	Jan. 1969	Jan. 1973
Clark M. Clifford	Mar. 1968	Jan. 1969

ASSISTANT SECRETARY OF DEFENSE
 (INSTALLATIONS AND LOGISTICS):

Hugh McCullough (acting)	Feb. 1973	Present
Barry J. Shillito	Feb. 1969	Jan. 1973
Thomas D. Morris	Sept. 1967	Jan. 1969

DEPARTMENT OF THE ARMY

SECRETARY OF THE ARMY:

Robert F. Froehlke	July 1971	Present
Stanley R. Resor	July 1965	June 1971

ASSISTANT SECRETARY OF THE ARMY
 (INSTALLATIONS AND LOGISTICS):

Dudley C. Mecum	Oct. 1971	Present
J. Ronald Fox	June 1969	Oct. 1971
Vincent P. Huggard (acting)	Mar. 1969	June 1969
Dr. Robert A. Brooks	Oct. 1965	Feb. 1969

DEPARTMENT OF THE NAVY

SECRETARY OF THE NAVY:

John W. Warner	May 1972	Present
John H. Chafee	Jan. 1969	May 1972
Paul R. Ignatius	Aug. 1967	Jan. 1969

Tenure of officeFrom ToDEPARTMENT OF THE NAVY (continued)ASSISTANT SECRETARY OF THE NAVY
(INSTALLATIONS AND LOGISTICS):

Charles L. Ill	July 1971	Present
Frank Sanders	Feb. 1969	June 1971
Barry J. Shillito	Apr. 1968	Jan. 1969

DEPARTMENT OF THE AIR FORCE

SECRETARY OF THE AIR FORCE:

Dr. Robert C. Seamans, Jr.	Jan. 1969	Present
Dr. Harold Brown	Oct. 1965	Jan. 1969

ASSISTANT SECRETARY OF THE AIR
FORCE (INSTALLATIONS AND
LOGISTICS):

Lewis E. Turner (acting)	Oct. 1972	Present
Phillip N. Wittaker	May 1969	Sept. 1972
Robert H. Charles	Nov. 1963	May 1969

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