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HOUSING FOR THE ELDERLY
A STATUS REPORT

A WORKING PAPER

PREPARED BY THE

SPECIAL COMMITTEE ON AGING
UNITED STATES SENATE

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PREFACE

Housing needs of older Americans have been of major concern throughout the history of the Senate Special Committee on Aging. Our annual reports have made many recommendations for action, especially since the White House Conference on Aging of December 1971.

It has become clear, however, that even the most well-founded recommendations on housing for the elderly face grave difficulties in 1973. The Department of Housing and Urban Development—and those who shape the overall goals of the executive branch—have declared that existing programs should be sharply curtailed until entirely new programs, or possibly a Community Development Revenue-Sharing Program, replace them.

Ordinarily, a fresh view of past efforts is helpful. In this case, however, the review is accompanied by sweeping curtailment of housing programs and total suspension in some cases.

Fortunately, the Senate Banking, Housing and Urban Affairs Committee under the chairmanship of Senator John Sparkman has decided to conduct its own appraisal of existing programs and present and future needs.

To assure that attention will be given to housing needs of older Americans in the course of his hearings, Senator Sparkman has invited the Senate Committee on Aging to take an active role in preparations for such an appraisal. He has specifically asked for a status report on housing programs meant to serve the elderly. This Working Paper, prepared by committee staff, is intended to meet that request. It is an objective survey of the present situation, rather than a call for specific action. It is a working tool which will be helpful not only for Senator Sparkman's hearing, but for future discussions on one of the most pressing of all the problems facing older Americans: finding a place to live at reasonable cost.

FRANK CHURCH,
Chairman, Special Committee on Aging.
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Chairman, Subcommittee on Housing for the Elderly.

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A STATUS REPORT

I. INTRODUCTION

Any status report on housing for the elderly should clarify the quantity and quality of the existing housing stock, provide data on the supply and demand, and project accurately the Nation's overall need. Unfortunately, such precision is oftentimes lacking. The Department of Housing and Urban Development (HUD) has reliable figures to show the number of units for the elderly built under their various programs, but neither HUD nor the Bureau of the Census has produced sufficient data to make a reliable estimate of need. Past estimates have really only been guesses; and in fact, an accurate method of determining need has yet to be accepted.

While many housing programs affect the elderly both directly and indirectly, the focus of this brief report will be on those programs which have had the most important impact in providing or paying for low-cost housing to the poor and moderate-income elderly: Section 236, Section 202, Public Housing, and Rent Supplements.

It is also essential to point out at the start that housing for the elderly is a very special concept—one that should relate to every aspect of living. To the elderly person in search of better shelter, the question of "bricks and mortar" is secondary to the question of total living environment. The number of supportive services available is as vital as the convenience of location. The atmosphere of activity and interchange is more important than square footage or closet space.

Therefore, cutbacks in Medicare, Model Cities, and Social Services, as well as recent vetoes of Labor-HEW funds and the Older Americans Act Amendments can have a very direct effect on the availability of an attractive overall housing package. Housing for the elderly cannot be seen in a vacuum.

II. IMPACT OF THE HOUSING FREEZE

Effective at the close of business on January 5, 1973, all new commitments for subsidized housing programs were halted by the administration. This freeze affected three of the most important housing programs that help the elderly: the Interest-Subsidy program for rental housing (Section 236), the low-rent Public Housing program, and the Rent Supplement program.

While this moratorium does not mean that all construction has come to a screeching halt, it has left uncertain the number of projects and units that have been frozen and the number that have survived the freeze.

In announcing the freeze, Secretary Romney reported that subsidized housing starts for the next 18 months would continue at the rate of 250,000 units per year. The Department of Housing and Urban Development has promised a listing of projects frozen and projects cleared by the freeze, but that report has not yet become available. Consequently, if the projected level of housing starts is accurate, only an estimate can be made as to the number of units for the elderly that made it into the "pipeline" before the freeze became effective.

HUD policies prior to the freeze specified that, in public housing, units for the elderly would make up 40 percent of all new commitments. For Section 236 housing, about 20 percent of new commitments were reserved for the elderly.

In short, no one knows the full impact of the freeze on housing for the elderly. While it is clear that some sponsors have been hit particularly hard, there is no way at present to measure the number of units affected on a nationwide basis.

Although the housing freeze is difficult to quantify in specific numbers, its effect can be summarized in a more general way. Recent developments have made the timing of the housing freeze particularly disruptive in its impact on elderly citizens. First, one must realize that housing for older persons has become increasingly popular in the past few years. Suburban communities that never considered any type of subsidized housing welcome housing for the elderly, where they might reject family housing.

Secondly, the end of rent control and the jump in food prices have put a severe strain on the older person's budget and encouraged him to seek less expensive housing. Major rent increases have been levied on tenants since the end of Phase II, and elderly tenants on fixed incomes have felt these increases very dramatically. A letter in Committee on Aging files indicates that one woman in New York City is paying 89 percent of her monthly income for rent. Inflation continues as wholesale prices jumped 1.6 percent in February (an annual rate of 19.2 percent if it should continue). This jump was led by a 3.2 percent rise in farm products and wholesale food prices.

With shelter and food the two highest items on the average elderly person's budget, these recent developments have made older Americans increasingly aware of the need for housing projects designed for the elderly. The news of the housing freeze has therefore been doubly disappointing and frustrating.

As an illustration, the Housing Authority of Norwalk, Connecticut, has in process a 54-unit elderly housing project which includes a 5,000 square foot senior center. The Housing Authority has 600 eligible elderly persons on its waiting list with only 210 occupied units. Groundbreaking was to begin in February 1973 on this project, and the local community had raised $35,000 to help pay for the senior center (including raffles, cake sales, and Bingo parties). The Housing Authority receives frequent calls after applicants have checked the obituary column and find a vacancy has occured. One applicant even offered a bribe of part of his Social Security check to a member of the staff. HUD has stopped the processing of this project.

III. PUBLIC HOUSING

As the Norwalk example illustrates, the freeze has directly affected planned public housing projects for the elderly. Certain other problems also face public housing, and particularly public housing designed specifically for the elderly.

A. FINANCIAL FEASIBILITY

An administrative directive by the Department of HUD (Circular 7475.1 Supp. 3 of December 29, 1971) established a financial feasibility test for all new public housing projects. This new policy requires that the routine operating expenses for the project not exceed 85 percent of the rent to be charged. In other words, for each $85 in expenditure on administration, operation, and maintenance of a public housing project there must be income of at least $100. The local housing authority can count on only $10 per unit per month in Federal operating assistance to meet the operating expense.

In some areas of the country the effect of this directive is to make new projects for the elderly impossible. The elderly as a group have a very low average income and the housing authority can only charge up to 25 percent of that income for rent (Brooke Amendment).[1] Here is an outlined example of how this policy restricts development for the elderly:

Public housing development for the elderly

Estimated monthly operating expense (1972-77)	$65
15 percent contingency	10
Total	75
Projected monthly income:	
Rent paid by elderly household (25 percent of income)	36
Federal operating assistance	10
Total	46
Gap: Expenses over income	29

The National Capital Housing Authority in Washington, D.C., has not been able to meet this financial feasibility test for a new project for the elderly since it went into effect. Mr. James Banks, the executive director of the National Capital Housing Authority, feels that public housing exclusively for the elderly will never pass this financial feasibility test in Washington, D.C. To do so, a project would need an average yearly income of the incoming tenants to average over $3,000. Currently, the waiting list for elderly for public housing in Washington, D.C., numbers about 1,500. An analysis of their income done last year revealed only 15 households with incomes over $3,000. Consequently, this housing authority is very pessimistic about providing any new housing for the elderly.

While not all housing authorities are stymied by this requirement, its existence indicates a trend that could prove increasingly dangerous to

[1] Section 213 of the Housing Act of 1969, amending Section 2(1) of the Housing Act of 1937.

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public housing for the elderly. Housing for the elderly costs more to build than family housing, and generally incomes of elderly households are lower than other poor families. Unless HUD is willing to make exceptions for elderly projects, the administration's economy moves such as the financial feasibility requirement will soon make public housing for the elderly impossible.

B. CRIME AND LACK OF SECURITY

The need for better security in public housing is urgent and compelling. The Subcommittee on Housing for the Elderly of the Senate Special Committee on Aging has held hearings on this subject to document that need for the record.[2]

While it is abundantly clear that all age groups fall victim to the criminal, in many projects it is the elderly tenant who bears the heaviest brunt of the attacks. By reason of his relative inability to flee or resist, the elderly person is the most attractive prey. The common knowledge that his pension or Social Security check arrives on a known date each month only adds to the problem. In all too many cases, the end result has been that elderly tenants in public housing live in constant terror, day and night, at home and on the street. Despite often valiant programs by the local housing authorities, the problem is far too great for the available resources.

Security has never received sufficient attention at HUD. Historically, HUD has seen this problem as one for the local police force. In the report accompanying the 1970 Housing Act,[3] the Congress criticized HUD for administering its authority over operating subsidies too restrictively by failing to provide adequate attention to "improving the maintenance services and the living environment in public housing projects." This same report singled out as an eligible service "guard and other costs relating to the physical security of project residents." While subsequent HUD directives have authorized local housing authorities to provide supplemental security services, no money has been specifically earmarked for this purpose and the local authority has been left to fend for itself.

Recent developments suggest an even more pessimistic future for security in public housing. For several months during 1972, the Office of Management and Budget would not release sufficient operating subsidy money to local authorities. As a result, many authorities were severely hard-pressed, and some faced bankruptcy. Certainly they were in no position to provide a new or largely expanded security force. HUD told them they could budget money for security, but their budgets were already overburdened. The outcry from tenants was so strong, however, that local authorities searched everywhere for help. Several sources were tapped in a piecemeal way. Model Cities, the Emergency Employment Act, the HUD Modernization program, local city budgets, and the Law Enforcement Assistance Administration (LEAA) were all utilized to some extent.

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[2] Hearings by the Subcommittee on Housing for the Elderly, U.S. Senate Special Committee on Aging, "Adequacy of Federal Response to Housing Needs of Older Americans": Part 4, Washington, D.C., October 28, 1971; Part 5, Washington, D.C., October 29, 1971; Part 6, Washington, D.C., July 31, 1972; Part 7, Washington, D.C., August 1, 1972; Part 8, Washington, D.C., August 2, 1972; Part 9, Boston, Mass., October 2, 1972.

[3] Senate Report No. 91–1216 to accompany S. 4368, the Housing and Urban Development Act of 1970, prepared by the Committee on Banking and Currency, September 21, 1970, p. 16.

Contributions from city budgets have been rare, and there is no indication yet that Revenue Sharing will be helpful. In addition, LEAA will not fund a project on an "on-going" basis. Their commitment is rarely extended more than two years. The Emergency Employment Act funds have been frozen [4] ever since the veto of the Labor-HEW Appropriations bill last year, and the new administration budget proposes to phase out the program altogether. Model Cities and the Modernization program are also being terminated. Funds for security protection this year will be even more scarce than last year. The need for a specially earmarked funding source is unmistakable but, as yet, unanswered.

C. PUBLIC HOUSING STATISTICS

As of December 31, 1972:

All occupied public housing units	1, 259, 359
All units occupied by elderly (37 percent)	464, 555
Units specifically designed and occupied by the elderly	313, 555

IV. PAST RECORD OF HOUSING PROGRAMS AFFECTING THE ELDERLY

Through December 31, 1972, at least 452,414 housing units listed as specifically designed for the elderly, had received some form of Federal subsidy:

Approved units specifically designed for the elderly

Public housing [5]	348, 730
Section 202 [6]	45, 494
Section 236 [7]	*21, 832
202–236 conversions [8]	27, 488
Section 221(d)(3) [9]	*8, 900
Total	452, 414

*These figures only include fiscal year 1972 approvals.

The units outlined above are not now all occupied, but include those units under construction and those approved as well.

Section 231 (207) Mortgage Insurance Program

It should also be noted that 49,053 units for the elderly (as of December 31, 1972) were approved under the Section 231 program which absorbed a similar Section 207 program. This program did not subsidize any units, but simply insured the mortgage. There were

[4] The EEA program has continued since the veto, based on a continuing resolution that allowed for no increase in funding levels.

[5] This program is administered on the local level by local housing authorities pursuant to policies determined by HUD consistent with the Housing Act of 1937 when public housing began.

[6] Section 202 of the Housing Act of 1959 established a program of direct Government loans at 3 percent over a 50-year period to non-profit sponsors to construct apartment units for moderate-income elderly.

[7] Section 236 of the Housing Act of 1968 established an interest-subsidy program for multifamily housing construction. The owner or sponsor pays off a loan as low as 1 percent and the Federal Government pays the interest difference between 1 percent and the interest charged by the financing agency.

[8] In 1970, HUD determined that all remaining 202 applications would be funded under the Section 236 program, thus creating the 202–236 "pipeline".

[9] Section 221(d)(3) of the National Housing Act began in 1961. Under this program sponsors (non-profit, cooperative, or limited-dividend) were given below-market interest rate 40-year mortgage loans to build multifamily buildings for moderate-income families.

many failures and foreclosures under this program and it is now almost completely phased out.

Section 221(d)(3) Below Market Interest Rate

Similar to the Section 202 program, this program, while not dead, has seen only limited service in recent years. Because it provided direct loans to sponsors, the 221(d)(3) program, like the 202 program, is rapidly being phased out because of the impact of direct loans on the Federal budget.

HUD does not have an accurate account of the total number of units designed for the elderly under the 221 program, but does indicate that 8,900 were approved under the FY 1972.

Section 202

Unlike the Section 231 program, Section 202 housing for the elderly has never had a failure or a foreclosure. The Senate Special Committee on Aging has consistently argued for its continued use, a position based on detailed testimony of wide acceptance of 202, and studies that indicate it would be cheaper in the long run than the Section 236 interest-subsidy approach.[10] Because of its impact on the budget, the direct loan approach has fallen into disfavor with the administration, yet a recent report from the Joint Economic Committee[11] suggests that this approach would save the Government $2 to $4 billion over the 6 years in interest costs in financing Section 235 and Section 236.

The 202 program was especially attractive to sponsors familiar with housing for the elderly because they did not have to deal with the Federal Housing Administration which often meant misunderstandings, long delays, and required fees that added thousands of dollars to the mortgage amount.

Today the 202 program is still part of the housing law, but it is unused. Instead the administration has folded this program into the Section 236 program and is not accepting any more applications for 202.[12]

Rent Supplement

By and large, the Rent Supplement program has been disappointing. It has suffered throughout its existence since 1965 from underfunding and requirements that have been too restrictive. Originally the program was supposed to bridge the gap between public housing and private housing, but in practice it has adopted limitations similar to public housing and has been restricted to certain categorical groups such as elderly or disaster victims.

The Housing and Urban Development Act of 1972 would have revised this program and made it more flexible, but the bill did not pass. Because HUD was expecting this new revised program, their budget request for Rent Supplement was a low $48 million; $5.9 mil-

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[10] "Department of Housing and Urban Development's Comparison of Costs Under Sections 202 and 236 for Housing Projects for the Elderly". GAO Report, B-16737, August 1, 1972. See also: Aaron, Henry, *Shelter and Subsidies: Who Benefits From Federal Housing Policies* (Brookings Institution, 1972).

[11] "Housing Subsidies and Housing Policy", Report of the Subcommittee on Priorities and Economy in Government of the Joint Economic Committee, March 5, 1973, at p. 8.

[12] Senator Williams proposed and the Senate Housing Subcommittee accepted a $100 million increase in the appropriation for Section 202 raising the total from $650 to $750 million. This increase became part of S. 3248 which passed the Senate on March 2, 1972. The bill later died in the House Rules Committee.

lion of that figure was earmarked for the elderly in 4,700 units. Currently, the administration has impounded $38.6 million for Rent Supplement.[13]

Section 236

Since the decision to phase out the Section 202 program was made in the spring of 1969, the Section 236 program has been the primary vehicle of housing projects for the elderly outside of public housing. Because this program provides an interest-subsidy rather than a direct loan to the sponsor, it has less impact on the annual Federal budget, and for a given amount of capital, many more units can be approved. Nevertheless, the long-range costs (especially in interest) can reach very dangerous proportions. Realization of this danger has, in part, led to the current freeze. Approximately $171.5 million in Section 236 funds are impounded.[14]

Criticism of this program has focused on the inflexibility and added cost of dealing with FHA, and the frequent opportunities for high profit at the tenant's expense that have been revealed in the process of putting together a Section 236 project. In addition, this program has proved attractive to speculative contractors and investors who, unlike the usual non-profit sponsor, do not have the full-time commitment to management and successful operation of a project that should last several decades.

In summary, all the housing programs briefly mentioned above are under scrutiny by the administration. While no one is sure what their future status will be, the forecast of their continued life is pessimistic. Whether or not this country faces an entirely new policy of housing assistance, the very real need for more housing for the elderly continues to expand at a rapid rate.

V. THE NEED: THE RESPONSE

Beginning with the 1970 census, the term "substandard housing" was abandoned because that term was too subjective. In its place HUD has relied on two other housing census criteria: adequate plumbing facilities and incidence of overcrowding. In spite of this important change in terminology, President Nixon claims that only 8 percent of Americans were living in "substandard" housing in 1970.[15] If this figure represents the percentage of units either overcrowded or lacking plumbing facilities, it is misleading to compare it to the old "substandard" index of previous census years. Admittedly, the term "substandard" is open to differing interpretations; however, to suggest that the Nation's housing needs affect only 1 of every 12 Americans is seriously subject to challenge. Comparison of "plumbing" and "overcrowding" statistics between 1960 and 1970 show a considerable improvement in elderly-occupied housing. Unfortunately, such an approach leaves much to be desired. For example, it totally overlooks the very real need that can be based solely on economics. An elderly couple can own their own home outright, have all the necessary plumbing facilities, and indeed be "undercrowded" rather than overcrowded. At the same time, they may be badly in need of housing because they

[13] Appendix to the Budget for Fiscal Year 1974 (H. Doc. 93–16), p. 476.
[14] Ibid., p. 477.
[15] State of the Union Report (Part V) on Community Development.

are paying 40 or even 60 or 70 percent of their income for property taxes, utilities, and maintenance of their homestead. In short, current methods of determining housing needs for the elderly are inadequate.

One piecemeal approach to this question is to examine waiting lists for public housing and other projects. For example, waiting lists for the elderly for public housing number 32,000 in New York City and over 12,000 in Chicago. Unfortunately, many authorities stop processing applications for waiting lists after a certain point, and when lists are as long as New York's, many elderly feel it is futile to go through the effort to apply. Since eligibility requirements vary from city to city, an analysis of all waiting lists is not helpful except to indicate a general need. Said another way, the elderly make up 10 percent of the general population, 20 percent of those below the poverty line, and 40 percent of those eligible for public housing.

As the percentage of elderly in our population increases, and as successful housing projects for the elderly are built, more and more communities and individual senior citizens see these projects as the best means for living out their lives in security and dignity. Although we have been unable to measure that need precisely, we do know that many recent developments have increased the demand and the need for this type of shelter: increased awareness of the program, new acceptance in suburban communities, the growing need for supportive services, the end of rent control, and the rising costs of home maintenance, utilities, food, property taxes, and health care.

Despite the challenge of the White House Conference on Aging to establish a national policy on housing for the elderly, the administration has set no clearcut and effective goals or priorities. In his message to the Congress on aging in March of 1972, President Nixon made no attempt to define the future direction of housing for the elderly. Instead, he spoke only briefly of current program developments, many of which have proven either unresponsive or subject to possible extinction under the current moratorium.

The Senate Special Committee on Aging has made the following recommendations in its Annual Report (Development in Aging—1971 and January–March 1972) to improve the housing conditions for older Americans:

(1) A minimum annual production rate of 120,000 units should be made an integral part of a comprehensive national policy for housing the elderly;
(2) The position of Assistant Secretary for Housing for the Elderly should be established at HUD;
(3) The Section 202 Housing Program for the Elderly should be restored with an increased level of funding;
(4) Up to 60 percent of subsidized housing units occupied by the elderly should be eligible for rent supplement;
(5) Federal funding should be made available to provide trained security personnel at public housing projects; and
(6) The congregate meals provisions of the 1970 Housing Act should be amended to include funding for the cost of food.

APPENDIX

1971 WHITE HOUSE CONFERENCE ON AGING RECOMMENDED FOR ACTION: HOUSING

1. A fixed proportion of all Government funds—Federal, State, and local—allocated to housing and related services, shall be earmarked for housing for the elderly, with a minimum production of 120,000 units per year.

2. Eligibiilty for the benefits of publicly-assisted low and moderate income housing and related services shall be based on economic, social, and health needs. Recipients having incomes above an established minimum level shall pay for benefits on a sliding scale related to their income.

3. The Federal Government shall ensure that State, regional, and local governments and private nonprofit groups produce suitable housing for the elderly on the basis of documented need. The Federal Government shall encourage production through the uniform application and use of appropriate incentives.

4. A variety of living arrangements shall be made available to meet changing needs of the elderly. Such arrangements shall include residentially-oriented settings for those who need different levels of assistance in daily living. The range shall include (1) long-term care facilities for the sick; (2) facilities with limited medical, food, and homemaker services; (3) congregate housing with food and personal services; and (4) housing for independent living with recreational and activity programs.

5. Supportive services are essential in the total community and in congregate housing. Emphasis shall be given to providing more congregate housing for the elderly, which shall include the services needed by residents and provide outreach services to the elderly living in adjacent neighborhoods when needed to help older people remain in their own homes.

6. The State or Federal Government shall provide mechanisms to make possible local property tax relief for the elderly homeowner and renter.

7. Every effort shall be made to eliminate red tape and procedural delay in the production of housing for the elderly.

8. Particular attention shall be given to the needs of all minority groups and the hard-core poor elderly. At least 25 percent of the elderly housing shall be for the hard-core poor elderly, those with incomes at the poverty level or less per year.

9. All Federal agencies dealing with housing for the elderly shall be required to establish multidisciplinary teams to formulate guidelines for architectural standards based on the needs of the elderly. The multidisciplinary teams shall also have authority to review and approve innovative proposals.

10. Minority nonprofit groups shall be encouraged and assisted in developing housing for the elderly.

11. When housing units for the elderly are eliminated for any reason, adequate replacement units must be available and relocation programs provided before such persons are displaced.

12. Congress should revise the definition of a family in the National Housing Act to include single persons 55 and over.

13. The Federal Government shall encourage the preservation of neighborhoods of special character through rehabilitation, and selective replacement of substandard dwellings with new dwellings, with full provision for the elderly of the area to remain in their familiar environment.

14. Housing funds now impounded by the administration should be released and the highly effective Section 202 of the Housing Act with its special guidelines related to space, design, construction, and particularly favorable financing restored.

New Section 202 projects should be established by recirculating monies now being sent to the United States Treasury from mortgage payments and Section 202 conversions to Section 236 or like programs. Such conversions of current Section 202's should be encouraged by establishing incentives.

The Senior Housing Loan Section 202 administrative component of Department of Housing and Urban Development should have management audit responsibility for all Section 202 projects and all Section 236 elderly projects.

15. The Rent Supplement program shall be increased in dollars and eligibility.

16. Financial incentives shall be available to families providing housing and related care in their own homes, or in appropriate accomodations for their elderly relatives.

17. The Federal Government shall provide financial incentives to State and local governments to encourage property tax exemption of voluntary, nonprofit sponsored elderly housing projects.

18. The inability of the elderly to financially maintain their homes because of high maintenance costs and increasing taxes resulted in the recommendation that interest-free, nonamortized loans be made available, the amount of the loan to be related to income, with repayment either upon the death of the borrower or the transfer of the property. As an additional element of national policy, it is proposed that ways or mechanisms be researched to enable older homeowners to voluntarily utilize the equities in their homes, to increase their discretionary income while remaining in their own homes.

19. Congressional action shall be taken to establish within the Department of Housing and Urban Development an Office of Assistant Secretary of Housing for Elderly. This office shall have statutory authority and adequate funding to provide overall direction toward the implementation of a national policy and the production of housing for the elderly.

20. Executive action shall be taken to create an Executive Office on Aging within the Office of the President.

21. Congressional action shall be taken to create a Special Committee on Aging in the House of Representatives.

22. The Congress shall enact legislation to safeguard the elderly property owner or purchaser from unscrupulous real estate developers and/or promoters.

23. The Congress shall enact legislation providing special funds for adequate housing and supportive programs to meet the unique needs of rural elderly Americans including those on Indian Reservations.

24. Standards for physical and environmental security should be developed and applied as an integral and basic element of all housing projects serving the elderly.

25. Competent service to the elderly in housing requires sound research widely disseminated and utilized, covering many aspects of their living arrangements.

Such research shall be undertaken to cover the health, physical, psychological, and social aspects of environment in urban and rural areas; to delineate the needs of elderly over 80 years of age; to determine the needs of transient elderly; to establish the importance of selecting appropriate locations; and to provide safe and adequate construction. Particular attention is directed to the consequences to vulnerable older people of improper sales methods and inadequate housing ararngements.

There also shall be undertaken a well-conceived and well-financed program of training for professional and semi-professional staff to develop efficient and competent management in developments for the elderly.

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