GETTING EVICTED FROM PUBLIC HOUSING: AN ANALYSIS OF THE FACTORS INFLUENCING EVICTION DECISIONS IN SIX PUBLIC HOUSING SITES

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Abstract: Evictions, perhaps more than other civil remedies for controlling crime and disorder in public housing, have seized the attention of policy makers and housing directors during the 1990s. Nonetheless, public housing authorities have been slow to enforce the federal "one strike" policy, which grants site managers the authority to evict suspected offenders after an administrative hearing, without having to wait for a criminal conviction. This paper examines the effects of criminal and lease-violating behavior on evictions among residents living in six public housing developments in Jersey City, NJ after controlling for family characteristics. We examine, first, the structural and violation characteristics of a sample of households evicted in 1994 and 1995; second, whether evicted households differ significantly on various social dimensions using a random sample of households taken from the same population; and third, the relative importance of family, economic and lease-violating factors in predicting whether an eviction will result. The implications, based on a logistic regression model, point to the discretionary use of administrative

and policy violation notices as a promising tool for dealing with problem apartments in public housing communities.

INTRODUCTION

For many years, public housing developments across the U.S. have served as testing grounds for a broad range of crime prevention strategies. Early research efforts, most notably by Oscar Newman, found that accessibility and physical layout were key determinants of crime, fear and transience in urban housing populations (Newman, 1973; Newman and Franck, 1980). Newman and his colleagues subsequently advocated changes to the design of public housing to create "defensible space." Rainwater (1970) found that residents of the Pruitt-Igoe housing development in St. Louis felt endangered and socially isolated because of the poor security and extreme disrepair of their surroundings. These findings spawned extensive efforts to clean up the physical appearances of public housing sites, and highlighted the importance of social programs for public housing residents.

In recent years, many local police departments and public housing police agencies have taken a problem-solving approach to control crime and disorder problems in public housing sites (see Dunworth and Saiger, 1994; Giacomazzi et al., 1995; Mazerolle and Terrill, 1997; Weisel, 1990). Problem-oriented policing typically extends the responsibility for crime control beyond the police and relies on third parties such as property owners, citizen groups and municipal agencies, to solve crime and disorder problems (see Buerger and Mazerolle, 1998; Eck and Spelman, 1987; Goldstein, 1990). In addition to collaboration, the problem-solving approach requires police departments and partnership agencies to develop an understanding of how criminal incidents form patterns across targeted areas so that this knowledge can be used to implement long-term solutions.

Since traditional policing activities involve mostly arrests and prosecution, it is easy to forget that the police and municipal agencies can initiate a number of other legal actions to deal with recurring problems in public housing. For example, problem-solving programs can make use of city licensing, zoning laws, forfeitures, tenant lease policies and other civil remedies to gain compliance from residents and outsiders who are responsible for creating, or exacerbating, problems (see Goldstein, 1990). Problem-solving teams, working in selected housing developments of Philadelphia and Jersey City, for instance, have aggressively

enforced health codes and city ordinances to alleviate drugs and inci-
vilities (Weisel, 1990; Mazerolle and Terrill, 1997). Anti-drug efforts
initiated by the U.S. Department of Housing and Urban Development
(HUD) have also relied on civil measures, such as leasehold forfeitures
and restraining orders, to solve public nuisance and drug problems
(Popkin et al., 1995; Weisel, 1990).

The proliferation of alternatives to traditional policing methods is
largely representative of a paradigm shift in policing that assumes that
the police cannot effectively deal with crime on their own (see also
Skogan and Annan, 1994). It is within this context that we examine the
factors that influence eviction decisions in six public housing develop-
ments in Jersey City, NJ. We begin our paper with a summary of the
legal basis for evicting public housing residents. We then discuss our
research methods and data and conclude with a discussion of the role
of evictions as an alternative means to resolve problems in public
housing sites.

LEGAL BASIS TO EVICT RESIDENTS FROM PUBLIC HOUSING

Evictions, perhaps more than other civil remedies, have seized the
attention of policy makers and public housing directors during the
1990s. Many commentators suggest that the legal authority to evict a
resident who sells narcotics out of his or her apartment can provide an
effective response to problems in public housing sites. The Anti-Drug
Abuse Act of 1988 (Public Law 100-690) explicitly states that criminal
activity, including drug use, is cause for termination of tenancy. None-
theless, housing authorities have been slow to enforce this policy, partly
because of the tedious administrative hearings that accompany evic-
tions for misconduct. In addition, site managers are not always able to
obtain reliable information that will stand up in court, and, in some
cases, they do not realize the scope of their legal authority. This is
understandable, considering the vague guidelines that HUD provides for
implementing drug-related evictions: "The decision whether to initiate
proceedings to terminate tenancy in a particular case remains a matter
of good judgement by the Public Housing Authority (PHA) based on the
factual situation" (Anti-Drug Abuse Act of 1988).

Under the guidance of the federal "one strike" policy, and in accor-
dance with the Housing Opportunity Program Extension Act of 1996,
public housing managers have recently been given the authority to evict
suspected offenders after an administrative hearing, without having to
wait for a criminal conviction. Police officers and resident leaders may

provide arrest reports and personal testimony during the tenancy hearings. The lease amendment specifies that proof of criminal activity by a "preponderance of evidence" is sufficient to establish that there has been a violation. Housing directors largely support the new policy, which could potentially streamline a process that often takes years to complete (Cazenave, 1990). At the same time, many feel that the new policy fails to address a number of real-world issues. Specifically, local courts have been reluctant to fully embrace zero-tolerance eviction programs as a method of crime control. Judges acknowledge that public housing is a last resort for severely disadvantaged households with special difficulties locating adequate, affordable housing in the private market, particularly families experiencing single parenthood, discrimination and long-term poverty (President's Commission on Housing, 1982; see also Holzman, 1996). Indeed, the crime-reducing benefits gained by evicting a tenant must be measured against the considerable human and monetary costs of homelessness that may result (Weil, 1991).

To date, few criminologists have empirically examined the use of evictions to control crime in public housing, or the characteristics of households evicted for lease-violating behavior. Studies that incorporate measures of evictions usually rely on anecdotal information provided by housing authorities, much of which is reported in case studies and interviews with local officials (Dunworth and Saiger, 1993). For example, Harold Lucas, executive director of the Newark Housing Authority, reported 20 eviction cases resulting from criminal activity from 1992 through 1995 *(Sunday Star-Ledger,* 1996). The Jersey City Housing Authority (JCHA), the second largest of New Jersey's 81 agencies, chronicled only six criminal tenancy cases that led to evictions in 1995. These low numbers illustrate that crime- and drug-related evictions are relatively uncommon, despite the fact that over 900 felony arrests are made in both Jersey City and Newark housing developments annually (Center for Crime Prevention Studies, 1995).

This paper examines the effects of criminal and lease-violating behavior on evictions among residents living in six public housing developments in Jersey City, NJ after controlling for economic and family characteristics. We examine, first, the structural and violation characteristics of a sample of households evicted in 1994 and 1995; second, whether evicted households differ significantly on various social dimensions from a random sample of households taken from the same population; and, third, the relative importance of family, economic and lease-violating factors in predicting whether an eviction will result. We are particularly interested in examining the relative influences of criminal

violations compared to rent delinquency and other non-criminal violations in determining a manager's use of the civil law to deal with problem households.

Public Housing Residents of Jersey City

Jersey City resembles other densely populated, industrial cities in the northeast U.S. Located in the New York City metropolitan area, Jersey City sustains concentrated areas of low-income housing, joblessness and crime. Three out of ten Jersey City residents are foreign born — a higher proportion than is found in any other metropolis except Miami, FL. Encompassing 41% of the population of Hudson County, the city is best characterized as a blue-collar, urban center. The 1990 census shows an overall unemployment rate of 11%, and indicates that 18% of the total population (229,000) and 35% of all female-headed households live in poverty. A substantial number of these impoverished families reside in the 11 public housing developments managed by the JCHA.

Rates of violent crime and disorder are generally higher in other public housing than other inner-city locations. Comparative research using census tract and block-level data shows that, after controlling for economic and housing characteristics, public housing generates more index crimes of all types (Brill and Associates, 1977; Roncek, et al., 1981). Dunworth and Saiger (1993) found that housing developments in Phoenix, AZ; Los Angeles, CA; and Washington D.C. produced significantly higher levels of violent and drug-related activity compared to citywide and nearby neighborhood crime rates. Consistent with past research, public housing in Jersey City has been designated a "High Intensity Drug Trafficking Area," pursuant to Section 1005 of the Anti-Drug Abuse Act of 1988.

Weisburd and Green (1995) used mapping software to plot arrest and criminal investigation data against street addresses, and found that six public housing developments in Jersey City ranked among the top ten drug market and violent crime locations in the city. Drawing from a citywide analysis of narcotics and violent crime data, six developments emerged as experiencing severe and persistent crime problems: Duncan Apartments, Curries Woods Apartments, Montgomery Gardens, Lafayette Gardens, Booker T. Apartments and Marion Gardens (Weisburd and Green, 1995).

Table 1 profiles the six public housing developments included in this study. Each development was built during the 1950s and houses between 243 and 649 families.[1] Overall, the housing developments com-

prise a total of 2,640 discrete units. The percentage of elderly house-holds ranges from 5% in one study site (Duncan Apartments) to 22% in another (Booker T. Apartments), with most sites falling well below the city (25%) and national (35%) averages (Holzman, 1996).[2] Approximately one-third of all leaseholders living within the six public housing sites works at least part-time, while 37% receive Aid to Families with Dependent Children (AFDC).

Table 1: Profile of Targeted Public Housing Developments in Jersey City, NJ

Development	Style	Units	% One Adult	% AFDC	% Employed	% Elderly
Duncan	High-rise	645	60	51	27	5
Curries Woods	High-rise	524	52	38	30	15
Montgomery	High-rise	440	51	34	40	10
Lafayette	Walk-up	487	47	30	32	18
Booker T.	Walk-up	314	42	32	35	22
Marion	Walk-up	230	45	35	24	18

Source: Jersey City Housing Authority lease records and internal files

PUBLIC HOUSING LEASE RECORDS AND STUDY METHODS

Measuring the criminal and lease-violating conduct of public hous-ing residents is a menacing task. Police department records are impre-cise because they are affected by variations in citizen reporting and police deployment across neighborhoods (Dunworth and Saiger, 1993; Eck and Spelman, 1987). Although official data sources comprise de-tailed information on offense types and locations, they do not keep household-level information on public housing populations. Since this paper examines both criminal and noncriminal behavior, and circum-stances that influence a manager's decision to evict a household, back-ground factors that are not routinely collected through police reports must be incorporated as control variables. Furthermore, since many incidents that are known to and recorded by the police are never

brought to the attention of housing officials (thus cannot be considered during the decision-making process that precedes tenancy hearings), it makes methodological sense to use data that are internal to public housing authorities, preferably data upon which tenancy decisions are based.

As part of HUD's record-keeping system, housing authorities are required to maintain a lease file on each household. In addition to providing a unit-by-unit list of addresses within each site, the files include details on lease violations and the circumstances surrounding each event. The JCHA's data files are supplemented with arrest reports, treatment referrals and narratives furnished by police officers and social service providers. The exact procedure followed by individual agencies in documenting lease data varies, depending on the size and administrative style of the PHA (Holzman, 1996). In general, agencies update household records yearly and register violations with written "notices to cease" or "notices of nonpayment," depending on the nature of the infraction.

Lease records from 352 households across six public housing developments were examined in the spring of 1996. The sampling procedure involved the selection of two distinct samples. The first included lease records from 85 households that were evicted in 1994 and 1995. With the exception of three files that were either missing or being used in court, field researchers retrieved archival data on all leases terminated within the study period.[3] The second sample included lease records for 267 randomly selected non-evicted households, stratified by housing development.[4] For analytic purposes, a probability sample was used approximating household characteristics (i.e., employment status, number of minors, age of leaseholder) of the larger public housing communities. In total, we examined the lease records for 352 public housing households in Jersey City.

Study Variables

The dependent variable used in this study was the eviction status of each household, measured as "evicted" or "not evicted." The variable of eviction, then, is a dichotomous variable: households that were not evicted in either 1994 or 1995 received a score of zero, while those that were evicted received a score of 1. A total of 88 households were evicted during the study period.

The stated cause for eviction in most cases was habitual non-payment of rent. The tenant lease agreement stipulates that legal action for non-payment may be instituted one month after a second written

notice is issued (one notice is mailed out after each month a leaseholder fails to pay rent), allowing managers wide discretion in deciding when to initiate proceedings. Indeed, the average number of non-payment notices issued to non-evicted households was 2.9, more than the minimum requirement for legal action, suggesting that legal action is largely a function of a manager's control over the eviction process. As Keyes (1992) explains: "Many managers use nonpayment as a means of getting an eviction for what is actually a drug situation. When managers should go for a drug-related eviction and when they should go for nonpayment is a critical strategy decision, because the courts will not allow the conversion of one tactic to the other" (p. 182). Since New Jersey state law prevents PHAs from displacing juvenile offenders and residents who are in court-ordered drug treatment programs, eviction for non-payment may be seen as a tool for getting around legal obstacles.

The effects of criminal and lease-violating activity on evictions are examined using three primary independent variables: criminal lease violations, noncriminal policy violations and administrative complaints. These are interval-level variables indicating the number of violations of a specific type incurred by a household in 1994 and 1995. Since habitual non-payment of rent is the expressed cause for termination in most cases, high numbers of non-payment notices are naturally expected to increase the probability of eviction. However, we hypothesize that the presence of other forms of lease-violating behavior, particularly criminal activity, will increase the odds of eviction to a greater degree than non-payment. Violations unrelated to payment history, serving as latent predictors of eviction, are suspected to be an underlying cause for legal action in many situations, whereas rent-based proceedings mask their influence. This hypothesis will be tested statistically in the ensuing analysis by examining the odds ratios for latent predictors, which reflect the average change in the probability of eviction for every additional lease violation, holding all other independent variables constant.

Table 2 displays the composition of the three types of lease violations examined in this study. The first category of lease violations comprises crimes reported to and cleared by the police and later recorded by managers as household violations involving illegal activity. Over three-fourths of these criminal violations were recorded directly from arrest reports provided by Jersey City public housing officers. Assaults, drug-related crimes and disputes between intimates account for more than half of all arrests that eventually result in written violation notices. The second category of lease violations includes infractions that violate public housing policy, but that are generally less serious in nature and do not involve a criminal justice system response. Most of the infrac-

tions in this category are social incivilities related to household cleaning habits, everyday interactions with neighbors and treatment of the premises. The third and last category of lease violations includes administrative complaints issued when a leaseholder habitually fails to file occupancy forms, attend meetings or follow procedures set forth by the management.

Table 2: Categories of Public Housing Lease Violations

Criminal Violations	Policy Violations	Administrative Complaints
Drug crimes	Occupancy violation (boarders)	Failure to file occupancy forms
Disorderly conduct	Throwing objects from window	Inspection noncompliance
Larceny-theft	Unsanitary conditions	Failure to attend meetings
Aggravated assault	Littering/dumping	
Restraining-order violation	Graffiti in halls	
Receipt of stolen property	Dog ownership	
Vandalism/arson	Unruly behavior (minors)	
Public drunkenness		
Open warrant		

(a) *Source:* Jersey City Housing Authority lease records and internal files.
(b) Field researchers occasionally found a criminal and administrative violation on a single notice to cease. These violations were coded individually as if they were on separate notices.

Housing authorities are required to issue a preliminary notice to cease for any of these activities if they threaten the health, safety or right to peaceful enjoyment of the premises of other residents. It is only when such noncriminal activities continue that a manager has a cause for eviction.

Six control variables were included in the analysis, representing the structural and financial characteristics of the individual households in the study sample: (1) the age of the leaseholder; (2) the number of minors in the family; (3) one-adult household (yes/no); (4) the number of years living in public housing; (5) the monthly rent (dollars amount); and (6) the number of non-payment-of-rent slips issued. One-adult household is a binary variable indicating whether a household has one or more adult family members (18 years or older) on the lease. This measure should be interpreted with caution because of the regularity of adult males living "off the record" with a spouse or relatives. Like the violation types shown in 2, non-payment of rent slips issued is a continuous variable denoting the number of rent violations a household accumulated in 1994 and 1995, with 24 being the maximum number of issuances possible. In sum, the household variables selected here are moderately correlated with violation types (see Appendix), and, according to interviews with the site managers (n=6), are reasonably well-established factors influencing PHA decisions regarding eviction proceedings.

RESEARCH RESULTS

The analytic strategy used in this study involves a number of statistical tests. First, the average numbers of infractions committed by evicted and non-evicted households are compared. Second, using independent sample t-tests, the differences in family characteristics between the two samples are examined. Finally, a multiple logistic regression model is used to control for the effects of the household structural characteristics, allowing for an examination of the isolated effects of violation types on public housing evictions. Table 3 compares the characteristics of evicted and non-evicted households from the six public housing developments.

Table 3 presents eviction and non-eviction group percentages that reveal several noteworthy differences in earning potential and violation characteristics. A substantially higher percentage of non-evicted households (38%) than evicted households (24%) reported at least part-time employment in 1994 and 1995. Twenty percent more of the evicted households than the non-evicted households received AFDC or general assistance as their main source of income. The gap in earning potential is magnified after taking into account the proportion of working-age leaseholders in each of the samples: nearly 20% of non-evicted leaseholders were retired and receiving social security or pension benefits compared to just 6% of leaseholders in the eviction group. The higher

percentage of rent violations incurred by evicted households than non-evicted households, shown at the bottom of Table 3, may be the result of different employment circumstances.

Table 3: Characteristics of Evicted and Non-Evicted Households from Public Housing Developments in Jersey City, NJ (1994-95)

Household Characteristics	Evicted (N=85)	Not Evicted (N=267)
Female leaseholders	89%	85%
One adult households	47%	39%
African-American families	91%	89%
Part-time (or more)employees	24%	38%
AFDC/general assistance recipients	58%	38%
One or more criminal violations	52%	12%
One or more drug-related violations	32%	5%
Four or more non-payment slips	67%	32%

Source: Jersey City Housing Authority lease records and internal files.

Table 3 also indicates that more than twice as many evicted households than non-evicted households incurred one or more drug-related violations, even though the eviction sample is much smaller than the non-evicted sample. Measuring the extent to which drug and alcohol addiction precipitates rent delinquency is not the focus here, but it is reasonable to speculate that long-term addiction detracts from a resident's ability to make payments on time and comply with management policies.

A striking result presented in Table 3 shows that over half (52%) of those evicted from public housing incurred one or more violation notices for illegal activity in their last two years of residence, compared with 12% of households in the non-evicted sample. Only a handful of the active lease files (4%) contained more than one violation resulting in arrest, while 15% of the terminated files produced a string of three or more criminal violations. Family composition factors remained relatively stable across these groups. Female leaseholders were predominant in both samples. Just under half of the households contained one adult family member, and, on average, three residents occupied each of the units.

While Table 3 illustrates important differences between the evicted and non-evicted samples, statistical tests of the differences in family characteristics between the two samples are provided in Table 4.

Table 4: Independent Sample t-tests for Evicted and Non-Evicted Public Housing Households in Jersey City, NJ (1994-95)

Household Characteristics	Mean Value Evicted	Mean Value Not Evicted	t	Sig. (2-tailed)
Age of leaseholder	40.6	46.7	-3.367	.001
Family size	3.1	2.9	.903	.368
Number of minors in family	1.8	1.3	2.148	.034
Years as resident	12.0	16.9	-3.527	.000
Total annual income	9217.5	NA	NA	NA
Monthly rent	197.1	240.9	-2.240	.027
Nonpayment notices	6.2	2.9	6.091	.000
Criminal violations	1.0	0.2	7.373	.000
Policy violations	0.7	0.2	6.326	.000
Administrative complaints	1.6	0.3	8.754	.000
Total lease violations	3.3	0.6	11.493	.000

(a) *Source:* Jersey City Housing Authority lease records and internal files

(b) Levene's Test for Equality of Variance was used to determine whether equal sample variances could be assumed for the above variables. Pooled variance scores were adjusted accordingly.

(c) *Total lease violations* is the sum of all lease violation types, excluding non-payment of rent.

(d) NA indicates data not available.

As Table 4 shows, the evicted households and non-evicted households are significantly different across a number of family and violation characteristics. Evicted household leaseholders tend to be younger (40.6 years) than non-evicted leaseholders (46.7 years); evicted households have significantly more children in their care (1.8 children) than non-evicted households (1.3 children); evicted households have lived in public housing for a shorter time (12 years) than their non-evicted counterparts (16.9 years); evicted households pay significantly less

monthly rent ($197) than the non-evicted households ($241); and evicted households have far more lease violations (3.3) than non-evicted households (0.6).

Table 5 below presents the results from a multiple logistic regression model that is used to control for the effects of household structural characteristics, in order to examine the isolated effects of violation types on whether a household is likely to be evicted or not.[5] The odds ratios and p-values for predictor variables are presented in Table 5. In general, the coefficient Pi in the logistic model estimates the average change in the log-odds of eviction when Xi is increased by one unit, holding all other independent variables fixed. The antilog of the coefficient, e^P, then estimates the odds ratio

$$\frac{\pi_{x+1} / (1 - \pi_{x+1})}{\pi_x / (1 - \pi_x)}$$

where π_x is the value of P(y=1) for a fixed value x (Mendenhall and Sincich, 1996). Column 4 of Table 5 lists the computed values of (e^β)-1, which is an estimate of the percent change in the odds of eviction π = P(y=1) / P(y=0) resulting from every one-unit increase in x_i. The odds ratio for criminal lease violations, for example, estimates the percentage increase in the odds that a household will be evicted from public housing for every unit increase in criminal violations, holding all other socioeconomic and violation variables fixed. The Wald chi-square ratio (Column 3), like the t-ratio for ordinary least squares regression, provides a statistic for testing the contribution of each variable to the model.

Table 5 shows that for each additional criminal violation incurred by a public housing household in this study, the odds of eviction increase by 51%.[6] Administrative complaints show a stronger effect than other violation types, increasing the likelihood of eviction by 68% for each infraction. Policy violations are also a significant predictor of whether or not a household is evicted (p=.O35): for each additional policy violation, the odds of eviction increase by 41%.

Socioeconomic factors were quite limited in their predictive power of whether or not a household was evicted. Important exceptions were years as resident and monthly rent, both of which showed small, inverse effects. That is, as the number of years living in public housing and the monthly rent payments increase, the probability of eviction decreases.

Interestingly, non-payment slips issued was not significant at the p < .05 level when criminal violations and, in particular, administrative complaints were added to the model. This finding suggests that non-

payment of rent will only lead to eviction when more serious conduct violations (i.e., criminal and administrative violations) are also present. The chi-square test of overall model adequacy is given in the lower portion of Table 5 as $\chi^2 = 133.207$, with an observed significance level p < .000.

Table 5: Multiple Logistic Regression Model Predicting for Public Housing Evictions in Jersey City, NJ

Tenant Characteristics	B	S.E.	Wald	Odds Ratio	Sig.
Family Structure Factors					
Age of leaseholder	-.006	.016	.123	-.006	.726
Number of minors in family	.039	.115	.113	.038	.737
One adult household	.348	.383	.826	.294	.364
Years as resident	-.058	.020	8.329	-.059	.004*
Economic Factors					
Monthly rent	-.002	.001	4.070	-.002	.044*
Nonpayment slips	.055	.037	2.238	.054	.135
Lease Violation Factors					
Criminal violations	.720	.182	15.671	.513	.000*
Policy violations	.528	.251	4.425	.410	.035*
Administrative complaints	1.136	.196	33.710	.679	.000*
Total N = 352 **Dependent Variable = Eviction** **Model Chi-Square = 133.207 p < .000**					

Source: Jersey City Housing Authority lease records and internal files.
* p<.05

DISCUSSION AND CONCLUSION

This paper explored the factors that contribute to families being evicted from public housing. In particular, we examined the structural and violation characteristics of a sample of households evicted in 1994 and 1995, whether evicted households differed from non-evicted households on various social dimensions, and the importance of family, economic, and lease-violating factors in predicting whether or not a

household would be evicted. We were particularly interested in examining the relative influences of criminal violations compared to rent delinquency and other non-criminal violations in determining a manager's use of the civil law to deal with problem households. We began our paper by hypothesizing that the presence of lease-violating behavior, particularly criminal activity, would increase the odds of eviction to a greater degree than non-payment of rent. We also suspected that violations unrelated to payment history, serving as latent predictors of eviction, would be an underlying cause for legal action in many situations.

The results indicate that non-payment of rent plays a smaller role in eviction decisionmaking than once expected. After statistically controlling for noncriminal policy violations and household characteristics, rent delinquency failed to predict the occurrence of public housing evictions at the .05 level of significance. Moreover, although arrests are an important factor that managers considered in eviction hearings, administrative complaints (violations for behaviors that are unrelated to criminal activity or non-payment of rent) are the most important predictor of whether or not a household is evicted. Administrative complaints are recorded as "notices to cease" and are typically used by public housing managers for "lack of behavior" rather than for involvement in illegal activities or delinquent rent payments. For example, when residents are perceived by public housing administrators as being uncooperative — when they refuse to file or deliberately lie on occupancy forms, or when they fail to attend inspections and tenancy meetings — then a "notice to cease" may be issued. Site managers have considerable discretion in issuing "notices to cease," and many observers comment that the administrative complaint mechanism, and to a lesser degree policy violations, provide site managers with a capacity to build a case against residents who they see as being troublesome.

Within the broader context of civil remedies, notices to cease appear to be an important and direct tool used by site managers to control the activities of public housing residents. The vagueness of an "administrative complaint" allows site managers wide discretion in their decision to invoke this particular type of civil remedy in a range of different situations. On one hand, administrative and policy violation notices are social control tools that give site managers the means for controlling the behavior of law-abiding public housing residents. This type of civil remedy is inappropriate if site managers overuse administrative complaints and violations, or use them to unfairly target particular public housing residents. On the other hand, the administrative complaint and policy violation options provide managers with a method for systemati-

cally targeting criminally active public housing residents who pay their rent on time and avoid arrest. In these situations, public housing managers can use the administrative and policy violation mechanisms as a means to initiate eviction proceedings and deal with persistent problems in public housing settings.

The key to fair play in the use of administrative and policy violations in the public housing eviction process appears to be in controlling the unfettered discretionary use of a tool that has the potential for abuse. This is a specific challenge that is reflective of a broader challenge in the general use of civil remedies for crime control purposes. Given that a household that has been evicted from public housing is no longer eligible for federally subsidized housing, we suggest that the discretionary use of administrative complaints and policy violation notices as a strategy to control the misconduct of public housing residents should be carefully monitored, and guidelines be developed to eliminate disparities in eviction decision-making processes. One direction PHAs could take is to standardize the eviction process, whereby households would incur a varying number of points for administrative, policy and rent violations. Public housing directors could set an annual point threshold, at which point an eviction hearing may be scheduled. Such guidelines would regulate site managers' discretion over the eviction process, at the same time allowing them to use a widely accessible civil remedy for controlling crime and incivilities in public housing communities across the U.S.

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Appendix: Correlation Matrix of Household Factors Influencing Public Housing Evictions

	1	2	3	4	5	6	7	8	9	10
1. Age of leaseholder	1.00									
2. Family size	**-.21**	1.00								
3. Number of minors	**-.39**	**.87**	1.00							
4. Years as resident	**.53**	-.03	**-.20**	1.00						
5. Monthly rent	**.22**	.10	-.10	**.25**	1.00					
6. Non-payment slips	**-.25**	.02	.07	-.09	.02	1.00				
7. Criminal violations	**-.11**	**.19**	**.20**	-.02	-.09	**.22**	1.00			
8. Policy violations	**-.11**	**.18**	**.22**	-.08	-.04	**.29**	**.33**	1.00		
9. Administrative complaints	-.09	.04	.07	-.03	.09	**.35**	**.18**	**.38**	1.00	
10. Total violations	**-.14**	**.17**	**.21**	-.05	.00	**.40**	**.66**	**.70**	**.80**	1.00

(a) **Boldface** signifies p < .05.

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NOTES

1. Many households have second generation families (e.g., a mother, daughter and daughter's children) living in the same unit. Variations in how extended families are grouped account for the discrepancy between the number of families residing in the six housing developments and the number of units reported in Table 1.

2. Elderly households include a primary leaseholder who is 62 years or older.

3. Records were designated "skipouts" when a family violated the lease agreement (usually through non-payment of rent), then moved from the housing development before eviction proceedings could run their course. Because this paper is only concerned with lockouts, and because it is impossible to determine which skipouts would have resulted in evictions had the families remained in public housing, these records were excluded from the sample.

4. Originally, 50 occupied units were randomly selected from each of the developments, totaling 300 households. Because JCHA lease records are not computerized and frequently change offices (i.e., management office, legal office), 33 records could not be coded. Background checks were made here to ensure that bias was not introduced into the sample.

5. The logistic analysis was built from the ground up by running a series of independent sample t-tests on household variables, then placing key predictors in the final model based on whether or not mean sample values differed significantly at the $p < .01$ level. Contextual information gathered during management interviews aided the selection process. Nine predictors were obtained, most of which are listed in Table 4 along with their respective t-values. Each independent variable was regressed on the remaining ones to test for multicollinearity; consequently, total lease violations and *family size* were discarded. One adult household was added to obtain a rough measure of the impact of adult guardianship on the odds of eviction.

6. The reasoning behind the model specified in Table 4 and the methods that guided this specification, are exploratory and not capable of ruling out alternative models for estimating PHA lockouts. Many factors retained here yield significant parameter estimates and the model chi-square test indicates that the data fit the model. But it is important to note that the tenant population and bureaucratic style of the JCHA are unique from those of other PHAs. Samples from high-crime developments in Jersey City, for example, may be disproportionately composed of tenants who have higher vulnerability to arrest, higher levels of nonpayment stemming from eco-

nomic hardship or more violation notices because of less tolerant management policies. These regional circumstances warrant caution in the generalizations that can be drawn.