

# Implementing Smoke-Free Policies in Public Housing

## A summary and analysis of 14 Final Evaluation Reports



*The purpose of this report is to examine activities by CTCP-funded Local Lead Agencies (LLAs) and Competitive Grantees (CGs) that worked with Public Housing Authorities (PHAs) in their respective counties to implement smoke-free policies in Multi-Unit Housing (MUH). The Final Evaluation Reports (FERs) reviewed here detail activities and objectives during three consecutive funding cycles: 2007-2010, 2010-2013, and 2013-2015.*

### Overview of the FERS

In the three funding cycles, the first beginning July 2007 and ending June 2010, the second from July 2010 to June 2013, and the third from July 2013 to June 2015, a total of 6 LLAs and 5 CGs worked on MUH, including public housing. Three projects worked on MUH during multiple funding cycles.

The 11 projects chose a range of Communities of Excellence (CX) Indicators as their primary objective during these years. There was no CX indicator specifically regarding smoking in public housing before 2016, when Indicator 2.2.31 was added. The CX indicators addressed in the 14 FERs are listed below.

<b>2.2.9 Smoke-free Outdoor Non-recreational Public Areas</b>	The number of jurisdictions with a policy prohibiting smoking on the premise of outdoor non-recreational public areas (e.g., walkways, streets, plazas, college/trade school campuses, shopping centers, transit stops, farmers' markets, swap meets).
<b>2.2.11 Smoke-free Common Outdoor Areas (since retired)</b>	Proportion of multi-unit housing complexes with a voluntary policy that designates common outdoor areas as smoke-free, such as playground, swimming pool area, and entrances -or- Proportion of communities with a policy that designates outdoor common areas of multi-unit housing complexes as smoke-free, such as playground, swimming pool area, and entrances, and/or resolutions encouraging owners, managers, or developers of multi-unit housing to adopt policies creating smoke-free outdoor common areas.
<b>2.2.13 Smoke-free Market Rate Multi-Unit Housing</b>	The number of jurisdictions with a policy prohibiting smoking in the individual units of market rate multi-unit housing including balconies and patios.
<b>2.2.23 Multi-Unit Housing Smoking Disclosure</b>	The number of jurisdictions with a policy requiring multi-unit housing complexes to disclose the locations of smoking and nonsmoking units, the smoking history of a unit, and/or require rental vacancy listings to include a category for smoking and nonsmoking units.
<b>2.2.26 Smoke-free Common Areas of Multi-Unit Housing</b>	The number of jurisdictions with a policy designating common indoor (e.g. laundry room, hallways, stairways, and lobby), outdoor areas (e.g. playground, swimming pool area, entrances), and 20 feet or more from entryways, windows, vents, and openings of multi-unit housing complexes as smoke-free.

In one case, a project did not choose MUH as its primary objective, but as it had an unanticipated opportunity to work with a public housing authority during its respective funding cycle, its work in that area was included in the FER. Overall, 5 of the 14 FERs reported that the projects' objectives were successfully met or exceeded. 4 reported that they "partially" met their objective, and 5 reported that they did not meet their objective. One project changed its objective

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midway through the grant cycle after it determined that working with the local public housing authority would not be possible, but was unsuccessful in meeting the new objective. Table 1 lists the projects, chosen indicators, and their outcomes.

**Table 1: Project Outcomes**

Project	Years	Indicator	Objectives Met?
ALA in California Bay Area Smoke-Free Housing Project	2010-2013	2.2.13, 2.2.23	Partially <sup>1</sup>
ALA in California The Smoke-Free Housing Initiative Project in San Diego County's South Bay Region	2010-2013 2013-2015	2.2.13, 2.2.26 2.2.13, 2.2.26	Yes <sup>2</sup> No <sup>3</sup>
Fresno County Rural Tobacco Education Program	2010-2013	2.2.13	No <sup>4</sup>
Imperial County Tobacco Education Project	2007-2010	2.2.11, 2.2.13	Partially <sup>5</sup>
Kings County Tobacco Control Program	2010-2013	2.2.13	No <sup>6</sup>
Merced County Tobacco Control Program	2010-2013	2.2.13, 2.2.26	No <sup>7</sup>
Smoking & Tobacco Outreach Prevention Project San Joaquin County	2007-2010	2.2.11	Partially <sup>8</sup>
Sustainable Health Advances in Rural Environments (SHARE) Humboldt County	2010-2013 2013-2015	2.2.13 2.2.13	Yes <sup>9</sup> Yes <sup>10</sup>
Tobacco Prevention and Education Program (TPEP) Solano County	2010-2013	2.2.13	No <sup>11</sup>
Ventura County	2007-2010	2.2.13, 2.2.23	Yes <sup>12</sup>
Tobacco Education Program	2010-2013	2.2.9	Partially <sup>13</sup>
Wellness Initiatives Now (WIN) Sacramento County	2013-2015	2.2.13	Yes <sup>14</sup>

In some cases, as in Humboldt and San Diego counties, work on smoke-free public housing was prompted by HUD's July 2009 memo encouraging (but not requiring) PHAs to adopt smoking restrictions. Complete project objectives are listed in Appendix A.

## Summary of Activities

The major intervention activities conducted by projects that met or exceeded their objectives are summarized in Table 2. Common strategies included recruitment and training of advocates in the community, collaboration with existing tobacco control coalitions, submitting written pieces about smoke-free MUH to local media, drafting model policy language, conducting outreach to residents of MUH that would be affected by policy change, and giving presentations to PHAs and other decision makers.

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**Table 2: Project Intervention Activities**

Project	Intervention Activities
<p><b>ALA in California</b>  <b>The Smoke-Free Housing Initiative Project in San Diego County's South Bay Region</b></p>	<ul style="list-style-type: none"> <li>• The intervention targeted National City policy makers and housing authority staff. National City tenants exposed to SHS in their apartment buildings were recruited to help advocate for a citywide smoke free MUH policy. Recruitment efforts included working with school resource teachers, youth advocacy groups, health educators and distributing outreach materials.</li> <li>• Networked with MUH industry associations to share expertise in adopting and implementing no smoking policies. This effort resulted in training and technical assistance for property managers interested in adopting voluntary smoke free policies.</li> <li>• When efforts to identify adult policy champions yielded few results, staff collaborated with the National City high school to form a youth advocacy group. Two trainings were held to provide youth with the knowledge and skills necessary to advocate for smoke free MUH. Five youth employed at least one advocacy action in the two months after the training.</li> <li>• Media advocacy activities included an op/ed piece that ran in the Star News describing the lack of action by the National City city council on its policy. A feature story on San Diego's public broadcasting station (KPBS) ran on television and radio; the broadcast highlighted the problem with SHS in MUH settings.</li> </ul>
<p><b>Sustainable Health Advances in Rural Environments (SHARE)</b>  <b>Humboldt County</b></p>	<ul style="list-style-type: none"> <li>• Participated in statewide trainings, teleconference and webinars to seek technical assistance from statewide projects such as the Technical Assistance Legal Center (TALC), The Center for Policy Organizing, the Tobacco Control Evaluation Center (TCEC) and the California Smokers' Helpline.</li> <li>• Regularly attended Humboldt County and regional tobacco coalition meetings.</li> <li>• Facilitated small group meetings with on-site public housing facility managers to provide campaign briefings about benefits of smoke-free units, dangers of SHS, and campaign resources.</li> <li>• Developed education materials with multi-unit housing staff and resident input to inform and mobilize community support for project goals and to promote policy adoption and implementation.</li> <li>• Cessation material and information provided by the Humboldt County LLA were distributed to multi-unit housing tenants/staff.</li> <li>• Newsletter articles, letters to editors and press releases were written and submitted to local media sources to promote and announce smoke-free policy adoption.</li> <li>• Created and updated model policy language; conducted presentations to Humboldt PHA Commission to gain policy adoption; conducted recognition events following policy adoption; conducted Q&amp;A Training Sessions for tenants to promote policy adoption; met housing staff and/or tenants to promote access to cessation services; and provided technical assistance to PHA staff and/or managers regarding policy implementation.</li> </ul>
<p><b>Ventura County Tobacco Education Program</b></p>	<ul style="list-style-type: none"> <li>• Outreach education to apartment residents, especially those who would be subject to proposed policies</li> <li>• Training coalition members as effective advocates in public and private meetings</li> <li>• Educating decision-makers in public and private meetings</li> <li>• Identifying and encouraging voluntary policies among private apartment owners (to build support for public policy)</li> <li>• Creating media products to support the campaign</li> </ul>
<p><b>Wellness Initiatives Now (WIN)</b>  <b>Sacramento Count</b></p>	<ul style="list-style-type: none"> <li>• WIN staff participated in multiple meetings, teleconference and/or trainings annually with other CDPH/CTCP-funded projects addressing SHS exposure in multi-unit housing.</li> <li>• Attended 4 Sacramento County Tobacco Control Coalition Meetings annually to coordinate local policy efforts, share project activities, and gain useful information.</li> <li>• Posted 2 Partners postings regarding project activities. Staff participated in CTCP SHS and MUH technical assistance teleconferences and webinars, and in Project Directors' Meetings. Collaborated with all appropriate statewide technical assistance providers including ChangeLab Solutions, TECC, Tobacco Education and Materials (TEAM) Lab, and/or California Smokers' Helpline.</li> <li>• Met with 15 Housing Choice Voucher facility managers in small groups to provide initial campaign briefings as well as tobacco education. Staff attended 3 meetings of the Sacramento Resident Advisory Board (RAB) and conducted 3 presentations to promote the benefits and implementation steps entailed in a smoke-free policy in Sacramento Public Housing.</li> </ul>

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Project	Intervention Activities
<p><b>Wellness Initiatives Now (WIN)</b> <b>Sacramento County</b></p>	<ul style="list-style-type: none"> <li>• TECC and TEAM Lab at USC were queried about the existence of and/or possible development of materials pertinent to affordable housing providers and accessible to low literacy audiences. Staff created and/or updated 4 fact sheets addressing topics such as: steps to mobilize community support for smoke-free public housing including topics such as gaining media attention for the issue and conducting recognition activities; scientific, legal and demographic information promoting adoption and implementation of a 100% smoke-free policy; “how to” steps for successful implementation of a smoke-free policy at MUH complexes participating in SHRA’s Housing Choice Voucher Program; and low literacy “why comply” fact sheet addressing tenant rights and responsibilities and cessation services of the California Smokers’ Helpline.</li> <li>• 217 quit kits were distributed to SHRA tenants and staff who express a desire to quit smoking.</li> <li>• Project staff wrote, submitted and published 5 articles in the SHRA “Tenant Focus” newsletter regarding project activities, promoting the smoke-free policy, providing implementation guidance and promoting the California Smokers’ Helpline. Staff also wrote 2 sample letters to the editor to be submitted by community-based organizations in support of the smoke-free affordable housing policy. In coordination with the Sacramento County Tobacco Education Program, project staff wrote and submitted 1 press releases announcing adoption and/or implementation activities relating to the SHRA smoke-free multi-unit housing policy. Press releases were distributed to primary media outlets in the Sacramento market.</li> <li>• Project staff collaborated with Change Lab Solutions to create and/or update a model smoke-free policy for application in the public housing arena. A Midwest Academy Strategy Session was conducted local representatives of interested groups including tenants and staff of SHRA to identify goals, allies, possible opposition, targets, and campaign tactics. In collaboration with the Sacramento County Tobacco Education Program and other campaign allies, project staff conducted a smoke-free housing presentation to the Sacramento Public Housing Authority Commission to promote a permanent, system wide smoke-free policy in 100% of their residential facilities.</li> <li>• Met with SHRA on-site residential managers to conduct implementation “walkthroughs” and other steps to promote tenant compliance with smoke-free policy and promote knowledge of California Smokers Helpline among tenants and staff.</li> <li>• Recognition events for the Sacramento Public Housing Authority, Resident Advisory Board and/or individual SHRA property managers following adoption of the smoke-free policy were hosted by WIN. A copy of the final policy was disseminated to CTCP Strategic Planning and Policy Unit, Center for Tobacco Organizing, Americans for Non-Smokers’ Rights and other interested agencies.</li> <li>• Project staff conducted Question &amp; Answer sessions for SHRA residents to inform them about the policy and cessation services of the California Smokers’ Helpline. Over 15 hours of technical assistance was provided to SHRA staff and Resident Advisory Board Members as needed to promote and implement policy.</li> <li>• The project culminated with 3 “Keep Us Quitting” sessions for 22 SHRA staff, residents and/or RAB members regarding sustainable quit smoking activities that can be conducted by them including downloadable materials from the California Center for Cessation Services, use of motivational interviewing techniques, free cessation materials from the Sacramento Local Lead Agency and free services from the California Smokers’ Helpline.</li> </ul>

All projects assessed in this report collected process data to inform the intervention activities; projects with an objective that necessitated outcome evaluation also collected outcome data to understand the impact of the intervention. The evaluation activities for each project are summarized in Table 3. Common process evaluation activities included key informant interviews, public intercept surveys/public opinion polls, focus groups, and policy and media records. Common outcome evaluation activities included observational surveys of MUH complexes and lease reviews.

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**Table 3: Process and Outcome Evaluation Activities**

Project	Years	Process Evaluation Activities	Outcome Evaluation Activities
<b>ALA in California Bay Area Smoke-Free Housing Project</b>	2010-2013	<ul style="list-style-type: none"> <li>• Key informant interviews with purposive samples of city and housing authority staff</li> <li>• Landlord evaluations of trainings provided to them</li> <li>• Intercept surveys at landlord fairs and other events</li> <li>• Record of hits on BASFH website</li> <li>• Media record</li> </ul>	<ul style="list-style-type: none"> <li>• Not specified in FER</li> </ul>
<b>ALA in California The Smoke-Free Housing Initiative Project in San Diego County's South Bay Region</b>	2010-2013	<ul style="list-style-type: none"> <li>• Key informant interviews with SHS experts, apartment managers and city staff (pre-policy) and housing authority staff (post-policy)</li> <li>• Youth advocacy training surveys</li> <li>• Media activity tracking</li> <li>• Policy activity tracking</li> </ul>	<ul style="list-style-type: none"> <li>• Pre- and post-policy housing authority tenant surveys</li> </ul>
	2013-2015	<ul style="list-style-type: none"> <li>• Key informant interviews with Chula Vista policy makers</li> <li>• Public opinion surveys</li> <li>• Data collection skills training for air quality monitoring procedure</li> </ul>	<ul style="list-style-type: none"> <li>• Pre- and post-policy key informant interviews with apartment complex managers</li> </ul>
<b>Fresno County Rural Tobacco Education Program</b>	2010-2013	<ul style="list-style-type: none"> <li>• Key informant interviews with policy makers to identify potential challenges and barriers</li> <li>• Media activity record</li> <li>• Policy record</li> <li>• Public opinion poll to determine support for MUH policy</li> </ul>	<ul style="list-style-type: none"> <li>• Documentation of policy passed by the city council</li> </ul>
<b>Imperial County Tobacco Education Project</b>	2007-2010	<ul style="list-style-type: none"> <li>• Key informant interviews with housing authority managers and directors</li> <li>• Public opinion surveys of public housing tenants</li> </ul>	<ul style="list-style-type: none"> <li>• Policy record of rental agreements/lease documents</li> </ul>
<b>Kings County Tobacco Control Program</b>	2010-2013	<ul style="list-style-type: none"> <li>• Key informant interviews with MUH managers, owners and other decision-makers</li> <li>• Public opinion polls of MUH residents</li> <li>• Survey of manager training</li> </ul>	<ul style="list-style-type: none"> <li>• Lease review planned, no data collected as objective was not achieved</li> </ul>
<b>Merced County Tobacco Control Program</b>	2010-2013	<ul style="list-style-type: none"> <li>• Public opinion polls of MUH residents and general public</li> <li>• Pre- and post-intervention interviews of MUH managers/owners</li> </ul>	<ul style="list-style-type: none"> <li>• Pre- and post-intervention observations planned of MUH entrances, pools, courtyards, etc. No post-test observations conducted as objective was not achieved.</li> <li>• Pre and post-intervention lease reviews</li> </ul>
<b>Smoking &amp; Tobacco Outreach Prevention Project San Joaquin County</b>	2007-2010	<ul style="list-style-type: none"> <li>• Participant training evaluation</li> <li>• Two waves of key informant interviews with MUH managers, residents, and STOPP staff (pre and post)</li> </ul>	<ul style="list-style-type: none"> <li>• Pre- and post-intervention observations of MUH complexes</li> </ul>

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Project	Years	Process Evaluation Activities	Outcome Evaluation Activities
Sustainable Health Advances in Rural Environments (SHARE) Humboldt County	2010-2013	<ul style="list-style-type: none"> <li>Key informant interviews with PHA staff</li> <li>Education/Participant survey (post training sessions for MUH/PHA staff, stakeholders, residents, etc.)</li> <li>Focus groups with PH residents and staff</li> <li>Media activity record to assess and track community awareness and response to the intervention</li> <li>Policy record tracking PHA policy adoption</li> <li>Data collection training for volunteers that conducted the observational surveys</li> <li>Technical assistance log to track TA provided to PHA regarding policy implementation (Purchasing signage, distribution of materials, and techniques for gaining maximum compliance)</li> </ul>	<ul style="list-style-type: none"> <li>Lease review to determine status of policy adoption</li> <li>Observational survey conducted at a purposive sample of public housing sites to determine existence of policy signage and compliance</li> </ul>
	2013-2015	<ul style="list-style-type: none"> <li>Key informant interviews with PHA staff and residents</li> <li>Education/Participant survey</li> <li>Focus group</li> <li>Data collection training</li> <li>Policy record</li> </ul>	<ul style="list-style-type: none"> <li>Lease review to determine status of policy adoption</li> <li>Observational survey conducted at a purposive sample of public housing sites to determine existence of policy signage and compliance</li> </ul>
Tobacco Prevention and Education Program (TPEP) Solano County	2010-2013	<ul style="list-style-type: none"> <li>Ten key informant interviews planned with housing authority staff and residents</li> <li>Pre-and post-intervention opinion polls planned</li> <li>Technical assistance log</li> </ul>	<ul style="list-style-type: none"> <li>Non-responsiveness of Housing Authority led to revised objective; no outcome data collected for original objective.</li> </ul>
Ventura County	2007-2010	<ul style="list-style-type: none"> <li>Review of program records</li> <li>Surveys (Smokers' Census and Owner-Manager survey)</li> <li>Key informant interviews of advocates, one council member and one housing staff member</li> </ul>	<ul style="list-style-type: none"> <li>Not specified in FER</li> </ul>
	2010-2013	<ul style="list-style-type: none"> <li>A purposive survey of public housing residents</li> </ul>	<ul style="list-style-type: none"> <li>Primary objective was not related to smoke-free MUH so outcome evaluation activities were not related to this area.</li> </ul>
Wellness Initiatives Now (WIN) Sacramento County	2013-2015	<ul style="list-style-type: none"> <li>Key informant interviews with Sacramento PHA staff, board, and tenants</li> <li>Education/participant survey</li> <li>Policy record</li> <li>Data collection training</li> </ul>	<ul style="list-style-type: none"> <li>Observational survey</li> </ul>

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### Challenges and Lessons Learned

Smoking policy change is often subject to the political climate of advocates' jurisdictions. Several projects acknowledged the difficulty of sustaining momentum on MUH work across multiple funding years. Even in areas where political will to adopt smoke-free policies has increased, as BASFH observed, implementation strategies may need to take into account the readiness and ability of stakeholders to move forward. Recommendations and lessons learned from working with PHAs and public housing residents are examined below.

### Working with PHA Staff and Residents

Every project reviewed for this summary report attempted to include smoke-free public housing policies as part of their work on smoke-free MUH. The extent to which LLAs and CGs engaged PHAs varied, and not all of the projects were successful in working with PHAs in their counties. In some cases this was simply due to the PHA not seeing smoking restrictions as a priority at the time.

The San Joaquin County LLA, for example, was unsuccessful in working with the San Joaquin Housing Authority because the housing authority had more pressing economic issues and presumably did not have the time or resources to devote to working on smoking policy change during those years. However, the FER adds that in the final month of the project period (June 2010), housing authority officials met and unanimously voted to develop a smoke-free policy "in or around the 1,000 units managed by them in Stockton and around the county." The FER concludes that the 2009 HUD memo requesting PHAs adopt smoke-free policies was the likely impetus for this decision, and recommends offering support and assistance for the PHA in the future<sup>8</sup>.

Solano County TPEP abandoned its efforts to work with the Benicia Housing Authority due to the non-responsiveness of the BHA Executive Director. The FER lists this as one of three "unanticipated barriers" that prevented the project from meeting its objectives and offers this recommendation:

*This assessment cautions project planners and advocates that community readiness should be assessed and decision-makers pro-actively engaged before deciding*

*to pursue a specific policy change. The decision to focus primarily on decision-making authorities needs to be reconsidered.<sup>11</sup>*

ALA's Smoke-Free Housing Initiative Project in San Diego was successful in its 2010-2013 contract period, but did not meet its objective for the 2013-2015 cycle, in part due to its lack of success with the PHA:

*The Chula Vista Housing Authority staff eluded our attempts to discuss no smoking MUH policies. In part, it was reasoned that the Housing Authority does not own properties, and cannot make sweeping housing policy changes.<sup>3</sup>*

ALA further discovered that relying on residents to self-advocate was not necessarily the best approach, either:

*As in past contracts, dormancy set in, and project staff will need to find ways to revive momentum. They need to shift attention to property owners/managers as advocates in both cities [...] because even though community members are the ones impacted by secondhand smoke, they are less willing to enter the public arena and organize.<sup>3</sup>*

In its previous grant period, the project found that "initial efforts to engage residents [...] were met with apprehension and apathy. Working with youth groups was much more successful."

Imperial County TEP attributes not fully meeting its objective to hesitance on both the part of the housing authorities and their residents:

*At least two reasons appeared to resonate as to why the smoke-free policy was not adopted, namely, a) an overall lack of "readiness" of local housing authority agencies to adopt a voluntary written smoke-free policy, and b) tenants being torn between supporting a written voluntary smoke-free policy and not wanting to "cause trouble" for other complex tenants.<sup>5</sup>*

The WIN Program of Sacramento County observed that working with low-income residents requires sincerity and respect on the part of tobacco control advocates:

*WIN found and would recommend that tenant representatives are key to the success of smoke-free policy efforts in publicly-funded affordable housing. Bringing*

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*tenant advocates into the process early on ensures high-quality, relevant input that shapes how campaigns can be customized to meet the day-to-day challenges of low-income renters in diverse communities [...] Although low-income tenants are truly vulnerable and apprehensive about risking their place in public housing by speaking too loudly on any issue and being labeled as ‘trouble makers,’ they will step forward to support smoke-free policies if they believe that public health advocates are sincere, capable, and respectful partners.<sup>14</sup>*

These challenges suggest that tobacco control advocates should engage with both public housing managers/staff and residents early on in order to determine the needs and concerns of all stakeholders, and how best to ensure buy-in from each group moving forward. This could take the form of expanding an existing tobacco control coalition, or creating a separate taskforce dedicated to public housing.

### Enforcement

As most tobacco control partners know, enacting a policy and enforcing a policy are two very different challenges. BASFH concludes in its FER:

*Compliance with legislation that requires changing long established and accepted human behaviors like smoking in one’s own home takes a great deal of effort and relationship building among all of the key stakeholders.<sup>1</sup>*

The Smoke-Free Housing Initiative Project in San Diego’s South Bay Region found that enforcement of smoke-free MUH “was seen as the most difficult issue to address. Creating a menu of enforcement options may help overcome this obstacle.”<sup>2</sup>

BASFH also found that “property managers requested trainings and instructions on how to enforce the restrictions on tenants who were not compliant and asked that materials on secondhand smoke and smoking cessation be made more readily available to tenants.”<sup>1</sup> Projects should anticipate a desire for enforcement information, and provide appropriate policy signage and educational materials where needed.

### Other Recommendations

Solano County TPEP: *Future projects should engage in more assessment, strategic planning, and relationship building before campaigning for new policy adoption.<sup>11</sup>*

Fresno County Rural TEP: *Local data (i.e. public opinion polls) is essential to detail the extent of the problem [...] Policy makers need evidence that a smoke-free policy for MUH complexes [is] supported by tenants, residents, managers, owners, supervisors, and coordinators.<sup>4</sup>*

Ventura County TEP: *Familiarize your advocates with the housing authority structure, which differs from city to city.*

*Be prepared to do extensive ground-work, e.g., conducting resident surveys; educating, and building relationships with, resident councils, tenant associations, community organizations, housing authority director and staff (including the Building Engineer); and mobilizing new allies in the community, including potential city council advocates. (Although the city council may not sit as the housing authority, the council certainly has influence.)<sup>13</sup>*

SHARE: *Involving stakeholders as well as consumers, building in a cessation education component, having tested policy materials at the ready and supporting signage and enforcement were key ingredients for success.<sup>10</sup>*

Kings County: *Future steps should include ongoing resident and manager/ decision-maker education on smoke-free MUH policies, SHS and drifting smoke.<sup>6</sup>*

### Review of Literature

Current literature on the implementation of smoke-free policies in subsidized housing emphasizes the vulnerability of this population of tenants; both to secondhand smoke exposure and in the context of mobility. Tenants of subsidized housing have less freedom to move if they dislike the policies and may face other limiting factors such as advanced age and disability in addition to low income. Pizacani (2011) found that voluntary turnover in subsidized multiunit housing after the implementation of smoking restrictions was low, and suggests that this was due to the “shortage of low-income housing



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combined with long or closed waiting lists [that] makes subsidized housing difficult to obtain.” Winickoff et al.(2010) add that while the market incentive of public housing authorities to provide smoke-free housing is less than for private housing, because tenants cannot “vote with their feet,” PHAs “are well positioned to implement smoking restrictions, notwithstanding community resistance.” They caution that eviction as an enforcement measure “undermines the purpose of public-housing programs—that is, protecting vulnerable populations from homelessness.”

The question of enforcement is one of the biggest that MUH managers have. The challenge of enforcement may be the “greatest disincentive for PHAs to implement smoke-free policies” especially because “the threat of eviction cannot be wielded lightly.<sup>17</sup>” In its final rule, HUD “encourages a graduated enforcement approach that includes escalating warnings with documentation to the tenant file.” A common criticism of going completely smoke-free is that it will be difficult to enforce, particularly if residents are smoking in their units. However, an evaluation of smoke-free public housing units managed by the Boston Housing Authority demonstrated that “indoor air pollution is lower in apartments covered by building-wide smoke-free policies compared to apartments in buildings without these policies.” These findings lend support to the potential effectiveness of smoking restrictions in MUH. The Boston Housing Authority was one of the first large housing authorities to implement a smoke-free policy throughout its entire portfolio, which accounts for 27,000 residents:

*[...] The policy development process took place over several years, entailing resident involvement and signing of lease addenda acknowledging the policy change. Informational summits were held, residents were surveyed about their level of support for the policy change, and free on-site tobacco cessation counseling was offered to public housing residents and staff.*

An evaluation of subsidized MUH in Oregon noted a similar reduction of secondhand smoke exposure within units after implementation of a smoke-free policy despite the reported difficulty of enforcement by apartment managers:

*In general, we observed substantial reductions in the reported presence of SHS in the environment, especially indoors. However, for smoking to be eliminated entirely, there would likely need to be more resources devoted to education and possibly enforcement [...] Messages that emphasize the common good and include building cleanliness and fire safety as well as avoidance of SHS might be helpful in the effort to ensure clean indoor air for all tenants.<sup>16</sup>*

The findings from these studies suggest that a focus on community education and resident involvement in the implementation process is a predictor of successful policy change and compliance. A low-cost intervention by policy advocates, which entailed sending out information packets about smoke-free MUH, was found to be ineffective at generating actual policy adoption. It was, however, effective at generating interest and addressing stakeholder concerns.

Cessation resources are critical for the success of smoke-free policies in subsidized MUH. Drach (2010) recommends that access to cessation be tailored to the needs of vulnerable residents:

*An aggressive focus on cessation is also needed if smoke-free policies are to be successful in this setting. Tailored approaches to cessation that take into consideration the special needs of elderly and disabled smokers, including those with mental illness, are warranted and, like workplace cessation efforts, should build on the easy access to large, relatively stable populations who spend substantial amounts of time in a single setting.<sup>15</sup>*

## Conclusions

The response of California PHAs to HUD’s final smoke-free public housing rule will likely vary. PHAs that were unwilling to work with tobacco control programs in the past may now be incentivized to do so; implementation of smoke-free policies in applicable public housing units must be completed by August 2018. This is also an opportunity to develop stronger smoke-free MUH policies that prohibit electronic smoking devices and aerosols in addition to the products included in HUD’s requirements. LLAs and CGs that have already developed relationships with their local PHAs should encourage the

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involvement of residents in the implementation process as much as possible and work to make the restriction of smoking a collaborative effort rather than simply a hand-ed-down order. Removing barriers to smoking cessation, either by providing on-site cessation services or direct referral to other resources, is highly recommended. Doing so, in turn, may lead to better compliance with the smoke-free policy and reduce the time and effort needed for enforcement.

The need for early, extensive assessment of the community and its stakeholders' readiness for change is clear; this is true for private MUH as well as public housing. Assessing the attitudes and beliefs of community members in addition to those of MUH residents and staff will allow projects and advocates to address challenges and opposition as they arise; responding to resident and staff concerns as well as any misconceptions the public may hold about smoke-free policies.

The restriction of smoking in public housing may be a natural segue for projects to work on achieving smoke-free market-rate MUH. As is evident from this review of FERs, community members and MUH residents may be more willing to organize as advocates in some cities than others, even within the same county. Projects should assess whether a greater focus on decision makers is likely to be more effective than attempting to mobilize community members, or vice versa. Ultimately, projects that found the most success with adopting and implementing smoke-free policies in MUH were those that were able to bring all stakeholders to the table. Projects that have not yet begun to work on smoke-free MUH housing may want to start by building strong relationships and generating interest in the issue—laying the groundwork for future change.

## Implementing Smoke-Free Policies in Public Housing

### Appendix A. Local Lead Agency and Competitive Grantee Objectives

Project	Objective(s)
<b>ALA in California Bay Area Smoke-Free Housing Project</b>	By June 30, 2013, the City of Richmond will have increased compliance of their smoke-free multi-unit housing units ordinance by 50% as measured by surveys with landlords and renters; the multi-unit housing landlords in the City of Oakland who have implemented the landlord disclosure ordinance provision will have increased by 50% as measured by surveys with landlords. (2.2.13, 2.2.23)
<b>ALA in California The Smoke-Free Housing Initiative Project in San Diego County's South Bay Region</b>	By June 30, 2013, National City and/or at least one housing authority in San Diego County will adopt a no smoking policy, mandating that outdoor common areas and at least 50% of contiguous apartment units be smoke-free. (2.2.13, 2.2.26) By June 30, 2015, the City of Chula Vista, National City, and/or Chula Vista Housing Authority will adopt a smoke-free policy that restricts smoking in outdoor common areas of multi-unit housing complexes and in at least 75% of individual contiguous units (including balconies and patios). (2.2.13, 2.2.26)
<b>Fresno County Rural Tobacco Education Program</b>	By June 30, 2013, two (2) cities in rural Fresno County will adopt and implement a policy designating a minimum of 50% of individual units (including balconies and patios) in multi-unit housing complexes as entirely smoke-free units. (2.2.13)
<b>Imperial County Tobacco Education Project</b>	By June 30, 2010, three low income/affordable multi-unit housing (MUH) complexes, with at least 70% Low Socio-Economic Status (LSES) Hispanic/Latino Population with a minimum of eight (8) units in Imperial County will adopt a written voluntary smoke-free policy that restricts smoking in individual units (including patios or balconies) to be implemented in a minimum of 25% of units in each complex and prohibits smoking in all outdoor common areas (playgrounds, swimming pool areas, and entrances). (2.2.11, 2.2.13)
<b>Kings County Tobacco Control Program</b>	By June 30, 2013, a minimum of 3 multi-unit housing complexes in Kings County with at least 10 units each and with a predominately low SES tenant population will adopt and implement a voluntary written policy designating at least 50% of apartments (including balconies and patios) as smoke-free. (2.2.13)
<b>Merced County Tobacco Control Program</b>	By June 30, 2013, at least four (4) multi-unit housing complexes with at least 50 units in Merced County and a predominant low socio-economic status tenant population, will adopt and implement a smoke-free policy that eliminates smoking in common outdoor areas (e.g. playgrounds, swimming pool areas and entrances) and/or at least 50% of individual units (including balconies and patios). (2.2.13, 2.2.26)
<b>Smoking &amp; Tobacco Outreach Prevention Project San Joaquin County</b>	By June 30, 2010, 6 multi-unit housing complexes in culturally diverse communities within the cities of Stockton and/or Lodi (with a minimum of 12 units per complex) will be chosen to adopt and implement a voluntary policy that designates at least 2 common outdoor areas on the premises as smoke-free. Examples include (but are not limited to) a specific distance from entryways to the rental office, laundry or mailroom, and playground, pool or parking area. (2.2.11)
<b>Sustainable Health Advances in Rural Environments (SHARE) Humboldt County</b>	By June 30, 2013 the Humboldt County Public Housing Authority (PHA) will adopt and implement a written policy whereby all affordable multi-unit housing facilities operated under its authority will prohibit smoking in a minimum of 75% contiguous individual units, including balconies and patios. (2.2.13) By June 30, 2015 the Humboldt County Public Housing Authority (PHA) will adopt and implement a written policy whereby all affordable multi-unit housing facilities operated under its authority will prohibit smoking in a minimum of 75% contiguous individual units, including balconies and patios. (2.2.13)
<b>Tobacco Prevention and Education Program (TPEP) Solano County</b>	2010-2013 By June 30, 2013, the Fairfield Police Department in Solano County will (1) adopt a policy requiring that multi-unit housing complexes certified as crime free must prohibit smoking in at least 75% of contiguous units including patios and balconies, all indoor common areas, and within 25 feet of main entryways and outdoor tot lots, and (2) will certify at least two complexes that meet Crime Free Multi-Housing (CFMH) criteria with smoking prohibitions. (2.2.13)
<b>Ventura County</b>	By June 30, 2010, at least one Ventura County jurisdiction will adopt a new policy or strengthen an existing policy regulating smoking in multi-unit housing units and common areas. Policy(ies) will minimally require that (1) any units declared nonsmoking are to be contiguous, with the units' windows and doors protected by a nonsmoking buffer area, and (2) disclosure by the renting agent of the location of the smoking and nonsmoking units in the regulated building(s). (2.2.13, 2.2.23) By June 30, 2013, at least one Ventura County jurisdiction will adopt a policy regulating smoking at outdoor public areas, meeting at least five of seven outdoor areas defined as comprehensive policy (dining areas, entryways, public events, recreation areas, service areas, sidewalks, and worksites). (2.2.9)
<b>Wellness Initiatives Now (WIN) Sacramento County</b>	By June 30, 2015 the Sacramento County Public Housing Authority (PHA) will adopt and implement a written, permanent, system-wide policy mandating that all multi-unit housing (MUH) facilities operated under its authority in unincorporated areas of Sacramento County and in the cities of Sacramento, Rancho Cordova, Citrus Heights, Folsom, and Elk Grove will prohibit smoking in 100% of individual apartment units, including balconies and patios. (2.2.13)

*Implementing Smoke-Free Policies in Public Housing*

**Appendix B. Department of Housing and  
Urban Development Final Rule**

## Implementing Smoke-Free Policies in Public Housing

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