

**Stratford Housing Authority**  
**295 Everett Street**  
**Stratford, Connecticut 06615**  
**Phone (203) 375-4483 Fax (203) 375-9449**

Date: March 4, 2010

To: Connecticut State Committee on Housing

Re: Written Testimony Regarding SB 320

From: Kevin S. Nelson  
Executive Director  
Stratford Housing Authority  
295 Everett Street  
Stratford, Connecticut 06615

I am writing in opposition to Senate Bill 320 regarding the election of tenant commissioners through a tenant election. It is one thing to recognize a tenant organization and to have that organization recommend tenants for appointment to the local public housing authority, but it is an entirely different matter to have the tenant organization **become** the appointing authority. It puts the Authority Board in the position of serving two masters.

The oversight of the public housing authority rests with the municipality. It is effected through the appointment of a Board of Commissioners. In the case of the Town of Stratford, it is the Town Council that appoints members to the Stratford Housing Authority Board.

The Housing Authority Board is a policy-making board charged with setting the business course for the Authority. The day-to-day activities are carried out by staff. This means that the position of Tenant Commissioner is one of representing the interests of tenants through policy. All Commissioners, including the Tenant Commissioner, must constantly balance the interests of the tenants with the overall best interests of the Authority as a business. The Tenant Commissioner position then, is not one of day-to-day resident advocacy.

It is my understanding that this bill was prompted, at least in part, by one case where a “popular tenant commissioner” may be removed due to a change in the political landscape (one would think that the popularity of this tenant commissioner meant that the municipal appointing authority did its job by selecting an appropriate and qualified tenant to serve on the board). I would respond that the fact that a housing authority commissioner can be replaced due to a change in political climate affects all commissioners, not just tenant commissioners. To reduce this appointment to a popularity vote as opposed to a vetted selection performed by the municipal authority would do more harm than good. Popular choices are not always the best choices. Most tenants are residents in good standing but

many are not. What would happen if a tenant not in good standing gets elected and has a vendetta against the Authority? What would happen if a tenant is elected and then has to be evicted for a lease violation? How long would the election process take to make the replacement? What happens if a bad tenant commissioner keeps getting re-elected because the tenant is popular with the tenant population? In the case of a tenant commissioner election, would the municipality be able to bring an action against the tenant organization for any failure on the part of the tenant commissioner? Would it even be able to remove the tenant commissioner?

It is my understanding also that this bill was prompted by concerns of the Public Housing Resident Network that, across the state, tenant commissioners vary widely in their inclination and ability to represent the interests of the tenants. I would respond by urging the committee to ask the proponents of this bill to "make the case". I have been an Executive Director in Public Housing since 1981 and am unaware of any widespread concern regarding the representative abilities of tenant commissioners, and no such concern has been expressed in Stratford. Further, the Stratford Housing Authority, on more than one occasion, has had the tenant commissioner serve as its Chairperson. This is a testament to the quality of tenant commissioners appointed by our municipality.

To restate, the Tenant Commissioner position is not one of day-to-day resident advocacy. Day-to-day resident advocacy is accomplished in a variety of ways. Residents can first and foremost come to the scheduled Board of Commissioner meetings. They can also respond and provide input on the Agency Plans, rules and regulations and other documents advertised for public comment. They can communicate through their resident organizations. Tenants are also ably represented through a variety of legal, fair housing and other organizations that protect their interests.

Since the municipality bears the burden and consequences of oversight, appointments to the Housing Authority board should rest with it. And since tenants, and tenant organizations, currently have a right to petition the appointing authority on behalf of a candidate for appointment as a Commissioner, I see no compelling reason to change the current successful process.

I wish to thank the members of the Committee and the Legislature for the difficult work that you do, the difficult decisions you make, your attention to this very important issue and the opportunity to comment.

Respectfully submitted.