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**Under One Roof:**

**Model Healthy Housing Policies for Comprehensive Plans**

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## Introduction

*Housing is an important determinant of health, and an increasing body of evidence links housing with infectious and chronic disease, injuries, poor nutrition, and mental disorders.2*

Health begins well before the doctor’s office – it begins in homes, schools, workplaces, neighborhoods, and communities. Research shows these “social determinants of health,” including environmental and socioeconomic factors, explain the majority of how sick or well we will be over our lives.1

**To learn more about the links between housing and health, see:**

Health Policy Brief: The Relative Contribution of Multiple Determinants to Health Outcomes

Health Affairs

[*www.healthaffairs.org/healthpolicybriefs/brief.php?brief\_id=123*](http://www.healthaffairs.org/healthpolicybriefs/brief.php?brief_id=123)

**The Impacts of Affordable Housing on Health: A Research Summary**

Center for Housing Policy

[*www.nhc.org/media/files/Insights\_HousingAndHealthBrief.pdf*](http://www.nhc.org/media/files/Insights_HousingAndHealthBrief.pdf)

**Issue Brief: Housing and Health**

Robert Wood Johnson Foundation

[*www.rwjf.org/content/dam/farm/reports/issue\_briefs/2011/rwjf70451*](http://www.rwjf.org/content/dam/farm/reports/issue_briefs/2011/rwjf70451)

**Housing and Health: New Opportunities for Dialogue and Action**

National Center for Healthy Housing, in partnership with Center for Housing Policy, ChangeLab Solutions, and Trust for America’s Health

[*www.changelabsolutions.org/publications/housing-and-health*](http://www.changelabsolutions.org/publications/housing-and-health)

**Housing is Health Care**

National Health Care for the Homeless Council

[*www.nhchc.org/wp-content/uploads/2011/10/Housing-is-Health-Care.pdf*](http://www.nhchc.org/wp-content/uploads/2011/10/Housing-is-Health-Care.pdf)

**Impact of Affordable Housing on Families and Communities: A Review of the Evidence**

Enterprise Community Partners

[*www.enterprisecommunity.com/resources/ResourceDetails?ID=0093581*](http://www.enterprisecommunity.com/resources/ResourceDetails?ID=0093581)

**Framing the Issues – the Positive Impacts of Affordable Housing on Health**

Center for Housing and Policy

[*www.nhc.org/media/documents/FramingIssues\_Heath.pdf*](http://www.nhc.org/media/documents/FramingIssues_Heath.pdf)

**Where We Live Matters for Our Health: The Links Between Housing and Health**

Robert Wood Johnson Foundation Commission to Build a Healthier America

*http://tinyurl.com/oh4w7yy*

One way to ensure housing contributes to positive health for all residents is to develop and implement local plans and policies that take health into account. The model comprehensive plan policies included here were drafted to provide communities with ideas and inspiration for planning for healthy housing for all. They include best practices culled from across the U.S., as well as new ideas. We encourage you to contact us at [*www.changelabsolutions.org/healthy-housing*](http://www.changelabsolutions.org/healthy-housing) for more healthy housing policy ideas, or to share your community’s questions and stories.

*Planning for healthy housing should include policies that address engaging residents, building healthy homes, providing equitable housing opportunities for all residents, and creating healthy neighborhoods where communities can thrive.*

### What is a Comprehensive Plan?

A comprehensive plan is a broad policy framework that establishes a community’s vision, goals, and strategies for future development and growth. Comprehensive plans address a range of important community issues, such as: land use, circulation, noise, safety, health, economic development, growth management, parks and recreation, natural resources and conservation, transportation, and public facilities.

Comprehensive plans have different names in different states and regions, and are sometimes called comprehensive plans, master plans, specific plans, or community plans. For simplicity’s sake, we refer to them as “comprehensive plans,” but local terminology may vary. States also vary in how they view the legal weight or status of comprehensive plans. In some states, plans carry the weight of law; in others, they are guidance documents. Many states establish specific topics, or “elements,” that a plan must address, and housing is often one of these required elements. Some states prescribe schedules for regular updates, while others may leave updates to the discretion of local jurisdictions.

Housing policies in comprehensive plans must be consistent with any applicable state law (for example, CA Govt Code Sec. 65580 provides for “decent housing and a suitable living environment for every Californian”). If your state has laws governing policy content for local plans, your jurisdiction may consider adopting policy language stating their intent to pursue an even higher quality of living than statutorily required.

*While it’s important to understand the role of comprehensive planning in your state, the key thing to keep in mind is that comprehensive plans typically encompass a range of topics and goals, and cover a long-term time horizon, acting as a policy guide for decisions regarding future development.*

Public health is affected by many – if not all – elements of a comprehensive plan. Because comprehensive plans provide the vision and guidance for how a community will grow and change over time, it is important that many different voices inform the creation of comprehensive plans.

### Housing in Comprehensive Plans

*To learn more about comprehensive plans and how to integrate health in the planning process, visit: www.changelabsolutions.org /landing-page/participating-planning-process*

A housing element should consider four major health policy areas:

**1. Engaging residents**

Provide proactive and meaningful opportunities for community members to engage in decisions about their homes and neighborhoods.

**2. Healthy homes**

Ensure that new development or housing retrofits include safe and healthy building materials, clean indoor air, pest-free environments, energy and water efficiency, and design that prevents injuries and promotes universal access for people of all abilities.

**3. Equitable housing opportunities**

Ensure that housing is affordable to renters and homeowners at a range of income levels, and that the mix of housing reflects the various needs of the community’s residents.

**4. Healthy neighborhoods**

Develop housing in a way that promotes access to the daily needs and services that support a healthy life, including transportation, education, jobs, healthy food, places to play and be outdoors, and community services, such as health care and childcare.

In addition, a healthy housing element should:

* Address the connection between health and housing;
* Analyze current and projected housing needs for all demographics within the community, in addition to data on connected health outcomes, such as asthma or housing instability and mental health;
* Provide an overall vision, as well as goals, policies, and objectives, to preserve, improve, and develop a community’s housing;
* Be internally consistent with other parts of the comprehensive plan; that is, housing policies should align with those guiding land use, transportation, and other elements;
* Be approved by any relevant state bodies and consistent with any relevant state documents (for example, in California, certification is required by the State Department of Housing and Community Development; in Rhode Island, each local comprehensive plan is required to be consistent with the State Guide Plan); and
* Be updated regularly (often, every five to ten years) to reflect community’s up-to-date needs.

### Equity and Housing

The 1949 Housing Act established the goal of "a decent home and suitable living environment for every American family." The American Institute of Certified Planners (AICP) Code of Ethics states that planners have a responsibility to support the needs of underrepresented and disadvantaged people.[[1]](#footnote-1) These documents emphasize that planners and other decision-makers should use an equity lens when developing and vetting plans and policies. All aspects of planning for healthy housing should be viewed as an opportunity to advance more equitable and inclusive communities.

The location of a person’s home is a major determinant of whether they have access to good jobs, a quality education, and a robust social network. A lack of affordable housing in a community drives lengthy and costly commutes, few convenient work and educational opportunities, and social isolation – in other words, when housing isn’t affordable, people must make trade-offs that have the potential to compromise their health.

*In the City of Denver’s comprehensive plan, for example, the housing element acknowledges that “equitable standards based on outcomes may not require the same allocation of service or resources in every neighborhood, due to differing neighborhood needs.”*

For many, unaffordable housing means housing instability, which negatively affects health and forces households to forgo basic needs. Families who have reported that they have trouble paying for housing or utilities are 84 percent more likely to report that they have delayed necessary medical care and 116 percent more likely to report having postponed the purchase of needed medications.4 In addition, families that spend more than 30 percent of their income on rent also suffer other adverse health effects, such as reduced cognitive development in youth.5

As rents rise and affordable housing options disappear, the difficulty of finding alternative housing intensifies, too. With limited budgets and numerous necessities to pay for, such as food and clothing, low-income populations are more likely to select lower-quality housing they can afford.6 As a consequence, low-income families and individuals are more likely to live in housing with rodents, mold, or structural problems.6 Not only does this environment jeopardize the health, safety, and welfare of residents, it poses an especially acute risk to sensitive populations like young children and seniors.2,7,8

These inequities are compounded by systemic and historic factors. The Federal Housing Administration’s practice of denying housing financing in neighborhoods based on their racial composition (known as “redlining”) and exclusionary racial covenants created a pattern of systematic disinvestment, which led to blighted, economically depressed, and unhealthy neighborhoods.9 Racial housing segregation, which persists today despite changes in housing law, has negative effects on families’ health.10 Access to affordable

rental housing throughout a city or region provides households with more control over where they can live, and may reduce segregation. Self-determination is important to all people, but an increased sense of agency has been shown to be especially important to the health and well-being of people struggling to make ends meet.11

To create quality and healthy housing for residents, and to combat the effects of past discriminatory practices, communities should consider using equity as a lens throughout the housing planning process. A carefully crafted healthy housing element can help uplift underserved communities, improve individual health outcomes, develop more resilient families, and reduce costs in shelter services and health care.

### Incorporating Health Into Housing Needs Assessments

Collecting and analyzing detailed information about a community's housing environment through a “housing needs assessment” helps inform the policies in the housing element, as well as other elements of the comprehensive plan. State laws may direct how jurisdictions conduct housing needs assessments, as part of the development of a housing element.[[2]](#footnote-2)

Ideally, a healthy housing element will be informed by a housing needs assessment that paints a picture of the existing conditions and current context of a community (including health outcomes), and provides a foundation for a community’s vision and goals. Health advocates may use the principles outlined here to augment the assessment process and ensure health is considered as part of data analysis.

Housing needs assessments typically include an analysis of demographic and economic status and trends, using “baseline” (or current state) information as a basis for the establishment of new targets or goals. For example, assessments may be used to determine the number of new housing units needed for a particular demographic group, like low-income seniors. However, housing needs assessments can also provide an opportunity to use health data to augment and focus housing policy; for instance, taking childhood asthma hospitalization rates into account can help set standards for improving indoor air quality.

Important questions to ask in the assessment:

* **Do demographic characteristics drive any particular housing needs?** A community’s housing needs are shaped by its many constituencies, including families with children, low- and moderate-income households, seniors, veterans, people with special needs, and the homeless. Each group may have particular health considerations connected with their housing needs.
* **Do economic characteristics drive any particular housing needs?** Consider residents’ income levels, employment trends (e.g., are many residents commuting into the locality because they can’t afford to live where they work, or having to commute out of the locality to get to quality jobs?), and market analyses. Determine the affordable housing needs of the community by:
  + Assessing the availability of and need for affordable housing, including areas where affordable housing shortages are increasing, or if there are increases in eviction rates and the reasons for those evictions; and
  + Determining which populations are affected by affordable housing shortages and suffer the resulting health effects of those shortages.
* **Do housing supply characteristics drive any particular housing needs?** Consider housing tenure (rented or owner-occupied), vacancy, overcrowding, age, cost/affordability), emergency housing availability, quality and safety of housing units, and subsidized and unsubsidized housing.

Many public health departments conduct community health needs assessments (CHNAs) to better understand the needs of the communities they serve. These assessments may take housing into account, and could be a source of relevant data to contribute to a housing needs assessment.

In addition to an analysis of current conditions and future trends, communities should also assess previous housing elements’ implementation successes and challenges. A jurisdiction should also include a plan for evaluating the achievement of its vision and goals in response to changing community conditions going forward. The City of Santa Clara, CA, for example, includes an analysis of previous policies that reviews the implementation process, funding sources and amounts received, whether the program has been successful (and why or why not), whether the program meets a community need, whether it is recommended that the program continue, and how the program could be changed to be more successful.12

### Understanding the Plan: Vision, Goals, Objectives, and Policies

Generally, comprehensive plans are organized under an overarching vision with related goals, objectives, and policies or action steps. This model uses the following terms, which should be adapted where appropriate. For specific plans, content can be organized in a number of formats, but should include the following information to maximize clarity and accountability: vision, goal, policy, program, rationale (discussing health implications), responsible implementing body, funding source, and time frame.

We encourage you to tailor the policy and action items to local needs, concerns, and conditions, and to provide additional implementation information, such as community context, a timeline, a funding source, and the agency or department responsible.

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| Glossary of Comprehensive Plan Terms | |
| Goals | Broad outcomes (which can be supported by an evidence-based rationale) to be achieved by implementing the comprehensive plan.  *Example: Residents will have access to housing that promotes individual and community health and well-being.* |
| Objectives | Specific outcomes (unlike the more comprehensive goals) describing an (ideally measurable) end state.  *Example: All neighborhoods have a mix of housing types to meet a diversity of income levels and household needs.* |
| Policies | Statements that set out standards and guidelines to regularly inform city staff, the planning commission, and local elected officials as they make decisions.  *Example: The City will prioritize infill development that will improve residents’ access to daily needs and services in underserved neighborhoods.* |
| Standards / Targets | Numeric objectives that define a desirable level or value of an indicator. (Standards can also serve as policies.)  *Example: All households live within a quarter-mile of a grocery store where fresh foods are available.* |
| Plans / Programs / Actions | Governmental actions taken in pursuit of a goal.  *Example: The jurisdiction will update zoning and subdivision ordinances to allow for construction of diverse housing types, such as accessory dwelling units and mixed-use development.* |
| Indicators / Baselines / Benchmarks | Measurable ways to assess progress toward a goal.  (A baseline provides a current measurement of a given indicator against which future progress can be measured; a benchmark sets a target for the indicator as the comprehensive plan’s goals and policies are implemented.)  *Example: Currently, about two percent of residents are chronically or periodically homeless. Implementation of this plan will strive to reduce this figure by at least half.* |

Additional resources are available online at: www.changelabsolutions.org/landing-page/participating-planning-process

## Model Healthy Housing Comprehensive Plan Policies

The following comprehensive plan language establishes policies that support healthy housing. The language is designed to be tailored to the needs of an individual community. The local jurisdiction will need to determine where to add this language to its existing plan, and/or include it during a comprehensive plan update. The locality must also follow the appropriate procedures for amending and adopting comprehensive plans, and may need to make other amendments as necessary to ensure consistency. Language written in italics provides different options or explains the type of information that needs to be inserted in the blank spaces in the policy.

### Housing Element Vision

**Examples of Effective Vision Statements**

Each community will need to craft a vision statement that captures the values and aspirations of its residents. Because every community is unique, we cannot draft a “model” vision statement; instead, we have provided two examples of communities describing the healthy future they envision.

The most recent comprehensive plan from the City of Denver, CO, included this inspiring quote from a vision originally established in their 1989 plan:

*The fundamental thing we want Denver to both be and become is a city that is livable for all its people. A city in which they can learn, move about, work and play in safety, comfort, with pleasure and pride, and in a spirit of openness and opportunity. It is essential that quality of life for all the people of Denver be perceived as this Plan’s central purpose.*

The City of Santa Ana, CA, provides a strong example of a housing-specific vision that explicitly includes health, as well as a variety of other aspirational goals:

*Santa Ana residents have an equal right and opportunity to find suitable housing in quality residential neighborhoods that allow themselves, their families, and neighbors to live the fullest lives. We support an inclusive community that is multigenerational, culturally diverse, healthy, sustainable, and economically broad. The City will facilitate the production, rehabilitation, and improvement of rental and homeownership opportunities at different affordability levels consistent with these principles.*

**Section 1: Resident Engagement and Participation**

**Goal 1: Housing is planned for, designed, and built in a way that responds to residents’ needs and reflects their voices and experiences.**

***Objective 1.1: Proactively and meaningfully engage residents in planning decisions that impact their housing and neighborhoods.***

**Policy 1.1.1** Encourage public participation in the development process by effectively engaging the community and making special efforts to accommodate all residents, including: (1) providing translation services, (2) providing childcare, (3) using a variety of venues throughout the community, and (4) using participatory facilitation techniques.

**1.1.2** Encourage residents and other stakeholders to participate in development plans and proposals through culturally appropriate public outreach efforts.

**1.1.3** Support creativity in the construction of new housing by proactively developing zoning and healthy design guidelines. Solicit broad public input during drafting.

**1.1.4** In order to understand and address public health implications of housing policies and projects, consider conducting health impact assessments when approving new development [*of x square feet or above*] or undertaking policymaking with regard to public infrastructure and development in order to understand and address public health implications of housing policies and projects.

**Section 2: Healthy, Safe, Efficient, and Sustainable Homes**

**Goal 2: All housing is designed and built in a way that facilitates health, sustainability, and efficiency.**

***Objective 2.1: Ensure that all housing has healthy indoor air that is free from pollutants such as tobacco smoke, mold, carbon monoxide, and radon, and is constructed from materials that do not contain hazardous elements, such as lead or asbestos.***

**Policy 2.1.1** Review, revise, and update zoning and subdivision codes, as well as other plans, laws, procedures, rules, regulations, guidelines, programs, templates, and design manuals, including [*other key documents*], where necessary, in order to promote healthy housing quality.

**2.1.2** Work with developers and [*relevant departments and agencies*] to prioritize health in planned construction, using healthy design checklists and/or other review tools.

**2.1.3** Establish or support abatement assistance programs that help residents eliminate common pollutants from their homes, such as providing free or subsidized supplies to test and monitor indoor air quality and providing grants to remediate indoor air pollution problems in low-income homes or affordable rental units.

**2.1.4** Reduce or eliminate toxic pesticide use in [*City/County*] owned or managed buildings through the use of integrated pest management (IPM) techniques and encourage the use of IMP on private property.

**2.1.5** Establish and operate a robust code enforcement program to ensure conformance with local regulations and to address maintenance issues that compromise air quality and health, such as dry rot, pests, and mold.

**2.1.6** Encourage coordination among agencies and departments to support pollutant-free homes, such as working with the fire department to provide households with free or low-cost smoke detectors and carbon monoxide detectors.

**2.1.7** Work with local hazardous waste disposal site(s) to provide residents and contractors with easily accessible facilities, properly dispose of hazardous materials, and institute a system of fines and/or penalties for improper disposal of hazardous materials.

**2.1.8** Establish local policies protecting smokefree multi-unit housing, such as prohibiting smoking in residential buildings controlled by the local housing authority, establishing jurisdiction-wide prohibitions of smoking in multi-unit buildings, and affirming by local ordinance that landlords may establish smokefree rental units.

**2.1.9** Require all new or substantially renovated multifamily housing projects, especially those within 500 feet of major sources of air pollution, such as freeways and major arterials, to incorporate site designs that minimize exposure to air pollution and/or use advanced ventilation standards.

***2.2: Maximize inclusivity by implementing housing design that meets the needs of all household members (including children, families, older adults, and people with disabilities).***

**2.2.1** Work with developers and [*relevant departments and agencies*] to ensure new housing development includes universal design[[3]](#footnote-3) features, such as a no-step entry, single-floor living, and wide doorways and hallways.

**2.2.2** Explore opportunities to retrofit existing housing supply to reflect universal design principles to facilitate injury prevention and accommodate of a variety of residents.

**2.2.3** Ensure housing design meets needs of people with sensitive health statuses, including people with chronic or terminal illnesses.

***2.3: Encourage sustainable design, construction practices, material sourcing, and home resource efficiency in current and future housing.***

**2.3.1** Provide incentives for households to improve resource efficiency, such as rebate programs, tax incentives, and giveaways for items such as low-flow showerheads and electrical outlet insulation.

**2.3.2** Encourage changes in building code to reflect emphasis on health, sustainability, and energy efficiency.

**2.3.3** Provide incentives for contractors to obtain Leadership in Energy & Environmental Design (LEED) professional credentials as well as LEED certification for their buildings. Provide incentives and support for contractors to acquire credentials in sustainable and equitable design and construction practices, such as LEED, GreenPoint, Living Building Challenge, and JUST.

**2.3.4** Provide incentives for architects and contractors who pursue building certification for sustainable and healthy design and construction practices.

**Section 3: Healthy and Equitable Housing Opportunities**

**Goal 3: Ensure that all residents have the opportunity to make meaningful housing decisions for themselves and their households by providing a diverse supply of quality housing at a range of affordability levels, and develop neighborhoods that are accessible to all household types, income levels, and age groups.**

***3.1: Maintain social and economic diversity by constructing and preserving an adequate and diverse supply of location-efficient and affordable housing options for all residents, including those with special needs, the homeless, older adults, and families with children.***

**3.1.1** Create strategies and establish funding streams to preserve and maintain existing affordable housing supply, such as rehabilitating low-income, owner-occupied housing and preserving assisted rental housing.

**3.1.2** Develop an inclusionary housing incentive policy that includes incentives such as density bonuses, financial support to nonprofit housing developers, and fee waivers.

**3.1.3** Coordinate housing-related efforts across all agencies and departments, and tailor strategies to respond to existing and projected demographics and market demand.

**3.1.4** Work across departments to align housing development and economic development strategies to ensure housing affordable to people working in planned jobs or industries.

**3.1.5** Provide adequate rental and ownership housing opportunities and supportive services for seniors, people with disabilities, families with children or multi-generational families, and people needing emergency, transitional, or supportive housing.

**3.1.8** Take a leadership role in regional efforts to increase affordable housing preservation and production, while also maintaining the [*City/County’s*] commitment to affordable housing.

**3.1.9** Ensure compliance with all state and federal regulations relating to housing opportunities and discrimination prevention.

***3.2: Ensure that new infill and housing development supports health by improving access to quality affordable housing.***

**3.2.1** Require, incentivize, or subsidize creation of subsidized affordable housing, including deeply subsidized or deeply affordable housing, in transit-served areas and areas identified for compact, mixed-use development.

***3.3: Ensure that all residents can enjoy the security of living in violence-free housing.***

**3.3.1** Locate housing developments near services that support families, such as violence prevention services.

**3.3.2** Review ordinances and make recommendations for amending them as necessary to protect victims of violence, such as reviewing nuisance ordinances to ensure that victims of domestic or family violence are not penalized for multiple police visits to their homes.

**3.3.3** Reduce the external conditions that lead to violence within the home (such as overcrowding) and partner with other agencies and departments to respond effectively.

**Section 4: Healthy and Equitable Neighborhoods**

**Goal 4: Create and maintain complete neighborhoods that include quality housing affordable to a diverse mix of residents and households, well-maintained infrastructure, safe conditions, and access to community resources and public facilities.**

***Objective 4.1: Encourage the development of diverse neighborhoods containing a broad mix of housing types affordable to a diversity of income levels.***

**4.1.1** Review and revise zoning and other policies to allow a variety of housing densities and types throughout the community to accommodate housing needs at all income levels.

**4.1.2** Develop affordable housing units throughout the community to avoid concentration in any one neighborhood.

***4.2: Support neighborhood quality by maintaining and improving the condition of existing infrastructure and enhancing infrastructure where needed.***

**4.2.1** Identify funding streams to support initiatives that improve the appearance, function, and safety of residential areas, including streets and sidewalks, utilities, storm drains, sewers, waste management, street cleaning, and public landscaping.

***4.3: Ensure that all neighborhoods are injury- and violence-free.***

**4.3.1** Incorporate “Crime Prevention through Environmental Design” standards into design guidelines, codes, and project review.

**4.3.2** Assess need of fences and barriers, and only include fences or barriers if safety risk is apparent. Incorporate design elements such as murals, cultural art, or landscaping in place of fences.

**4.3.3** Create, maintain, and supervise spaces for residents that promote a sense of place and community, such as: gardens, cultural plazas, playgrounds and community centers, outdoor and indoor seating areas, fountains, small stages or platforms for performance, public bulletin boards, and murals.

**4.3.4** Partner with public agencies and community organizations to strengthen policies and programs that prevent violence, such as programs that assist juveniles and adults who are re-entering their communities following incarceration.

**4.3.5** Create and implement street design strategies to facilitate safer public spaces, including encouraging street-oriented buildings, providing pedestrian-scale lighting, encouraging ground-level business uses that support pedestrian activity (such as retail and restaurants), and increasing street connectivity.

***4.4: Plan, design, and create complete neighborhoods whose physical layout and land use mix promote access to community resources (including services, food, retail, employment, education, childcare, recreation, and other destinations) by a variety of transportation means.***

**4.4.1** Promote infill development, redevelopment, and new construction in a compact form in developed locations whenever feasible.

**4.4.2** Encourage mixed-use development to allow siting of residential, retail, office, recreational, and educational facilities within close proximity to each other.

**4.4.3** Encourage transit-oriented development by developing public transportation in downtown areas and encouraging infill development near public transportation facilities.

**4.4.4** Maximize the proportion of residences within a quarter-mile of community resources, such as parks, schools, grocers, retailers, service providers, employment, and public transportation.

**4.4.5** Work with developers to balance commercial and residential development (jobs and housing) within [*jurisdiction*] to reduce the number of people who must commute a long distance to work.

**4.4.6** Work with private employers to provide live-near-your-work or employer-assisted housing financial incentives.

ChangeLab Solutions is a nonprofit organization that provides legal information on matters relating to public health. The legal information provided in this document does not constitute legal advice or legal representation. For legal advice, readers should consult a lawyer in their state.

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1. Relevant language includes that planners “shall seek social justice by working to expand choice and opportunity for all persons, recognizing a special responsibility to plan for the needs of the disadvantaged and to promote racial and economic integration. We shall urge the alteration of policies, institutions, and decisions that oppose such needs.”13 [↑](#footnote-ref-1)
2. California law, for example, requires jurisdictions to identify adequate sites to address their very low-, low-, moderate-, and above moderate-income housing needs based on their Regional Housing Needs Allocation (RHNA). [↑](#footnote-ref-2)
3. As defined by the National Association of Homebuilders, universal design is the “design of products and environments to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design.” [↑](#footnote-ref-3)