

## **HOUSING FOR THE ELDERLY IN COMPARATIVE PERSPECTIVE: THE UNITED STATES AND THE NETHERLANDS**

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### **Abstract**

*This paper compares residential satisfaction and aspects of housing tenure and affordability for the elderly in the United States and the Netherlands. The observed differences are examined against the background of differences in the national systems of general housing provision. In this regard, the United States and the Netherlands represent two very different models: capitalist market economy versus welfare state. Any attempts to transfer housing solutions from one country to another must carefully consider these broader contexts.*

### **Introduction**

Last winter Rebecca Smith, aged 61, died in New York City. She froze to death in the home she had constructed for herself inside a cardboard box. So begins an article by Madeleine Stoner (1989) about the plight of homeless women. The death of Rebecca Smith made national headlines, but unfortunately her situation is not unique in the United States where an estimated three million persons are homeless (Kozol, 1988, pp. 8-9, 207-209).

In the Netherlands, homelessness is a relatively minor problem. However, this does not mean that housing and services for the elderly eliminate each and every problem. Recently, a not entirely unusual item in a newspaper informed readers about the death of an elderly man (*De Kennemer*, 1991). The coroner's inquest revealed that he had been dead for about eight weeks. Neighbors had alerted the police when they noticed a pervasive stench originating from the man's apartment.

These two anecdotal episodes illustrate, for two very different housing systems, victims that have fallen between the cracks. Clearly, no system is perfect. However, all housing systems are not alike either. The elderly comprise a rapidly growing segment of the population in most advanced industrialized nations. It is relevant to examine how supportive different systems are of their housing needs. The United States and the Netherlands present an interesting comparison. United States approaches to housing provision have traditionally relied heavily on private sector initiatives. The Dutch have emphasized government intervention. This paper examines housing for the elderly in these two countries with a view to residential satisfaction and aspects of tenure and affordability. Consideration of these aspects is inevitably embedded within the broader context of the national systems for general housing provision. In this regard, the United States and the Netherlands represent two very different models. The former operates as a capitalist market economy; the latter follows the pattern typical of a welfare state. The following section briefly reviews characteristics of each of these models.

### **Housing in a Capitalist Market System**

The United States is a capitalist country. As a result, its housing system has been patterned according to a "free" market model. In this model, housing is treated as a commodity similar to automobiles and refrigerators. Provision of housing is expected to result from the interplay of supply and demand, where transactions are driven by the profit motive of private investors.

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A fundamental assumption underlying the capitalist model of housing provision is that households that are unable to compete for the more desirable housing stock will occupy units that are vacated and "filter down" as more affluent households move into new housing of higher standards (Tucker, 1989). Government's role is minimal, restricted to actions intended to ensure smooth market functioning.

In reality, however, capitalist systems do not have genuinely "free" markets. The interplay of supply and demand is molded by numerous government interventions (van Vliet--, 1990a). For example, the laying out and paving of streets; the supply of water; sewage disposal; utility provision; material and building standards; zoning ordinances; health, fire and safety codes; regulation of labor as to wages, hours and conditions; mortgage insurance; regulation of financial institutions; mortgage foreclosure laws; regulation of tenancy, including conditions of eviction, rent level and even household composition, in public and private housing--all of these things are known to be affected by government actions (Marcuse, 1990; cf. Otnes, 1988). Government tax expenditures also tend to be highly regressive and favor owners over renters. The socioeconomic polarization to which government thus contributes reinforces market segmentation which obstructs the filtering down of housing. Filtering also works imperfectly because of other widespread market distortions, in part reflecting the "risk adversiveness" of (a system driven by) private investors motivated by profit seeking. Access to housing is foremost a function of ability to pay. Hence, renters as well as homebuyers, unable to articulate effective market demands, frequently encounter discriminatory practices. Homelessness is also a poignant outcome.

Some have used the term "dual housing market" to describe the U.S. system. For example, Rosenberry and Hartman (1989) argue that a second housing tier has developed as a significant and growing share of the American population is unable to compete in the market. Government policies to support housing provision for this second tier have included public housing, rental subsidy programs, and support for nonconventional financing. These policies represent, in fact, an acknowledgment of the fundamental inadequacy of the market as the mechanism by which U.S. housing needs will be met. In conjunction with regressive benefits for private home ownership (notably, mortgage interest as a tax write-off), these policies not only accept, but also reinforce and institutionalize a dual housing market (Rosenberry and Hartman, 1989).

### **Housing in a Welfare State**

In the Netherlands, as in other European welfare states, national government emerged from World War II with a legitimate and active responsibility in the spheres of collective welfare (Flora and Heidenheimer, 1981). This responsibility derived in part from traditional legacies. However, additionally important was the collapse of private markets. In the context of more encompassing recovery programs, government stepped in to infuse much needed finance capital. These efforts were buttressed by the Marshall Plan, which was consolidated in 1961 by the more expansive Organization for European Economic Cooperation, superseded in 1961 by the more expansive Organization for Economic Cooperation and Development (OECD). Furthermore, political constituencies and allied labor unions in many European countries were better positioned to extract government commitment to public concerns such as education, health, and housing than was the case in the United States, Canada, and Australia. In these last countries, private interests more typically prevailed.

A basic premise underlying government involvement in European welfare states has been that private profit-oriented "free" market mechanisms cannot address the needs of economically disadvantaged population groups who are unable to articulate an effective market demand. Notwithstanding distinct differences among individual welfare states, the role of their national governments explicitly included the direct or indirect provision of housing.

### **Differences in General Housing Provision**

Historically, one finds considerable differences between the investment sources of construction activity in welfare states and so called "free" market economies. In the latter, sub-

sidized housing in general, and public housing in particular, have represented a small and usually declining proportion of new construction in the postwar period. In the United States, the construction of public housing never constituted more than a fraction of total new building nationwide. The ratio over private units dropped from .025 in 1965 to an even more minuscule .002 in 1985 (Pit and van Vliet--, 1988). In 1989, public housing accommodated about 1.5 percent of the U.S. population. Besides public housing, there have been various other forms of government aid and subsidy programs, the best known being perhaps Section 8 (Hays, 1988). Overall, however, the assistance that is provided does not meet existing needs. From 1981 to 1989, HUD's budget authority decreased by 80 percent, from \$32 billion to \$6 billion. Although federal outlays for assisted housing rose from \$5.4 billion to \$12.7 billion from 1980 to 1988 (Roistacher, 1990, p. 161), and the number of households receiving housing assistance increased from 2.2 million in 1974 to 4.2 million in 1988, the number of households not receiving housing assistance increased even more, and three out of every four persons living in poverty did not receive any housing subsidy at all (Appelbaum 1989, p. 6-7; USGAO 1989, p. 69). Federal housing starts dropped from 183,000 in 1980 to 20,000 in 1989. The Reagan administration also proposed to sell off 100,000 units of public housing, an effort that was stymied largely because public housing tenants are too poor to afford their units (Appelbaum, 1989, p. 7; Silver, 1990).

In contrast, subsidized and public housing came to represent significant proportions of the housing stock in welfare states. For example, in the Netherlands 44 percent of the housing stock in 1988 consisted of rental dwellings in the social sector; 84 percent of it was owned by non-profit housing corporations, and 16 percent by municipalities and other public bodies. Britain, Denmark, Sweden, Germany, and France are among other European countries that also have relatively large subsidized housing sectors (van Vliet--, 1990b, p. 23). Governments have used different mechanisms to provide housing for low-income households, including land development, direct construction, below market interest rate loans, underwriting of insurance schemes, special savings plans, rental assistance payments, tax abatements, and other financial incentives for builders and developers (Ball et al., 1988; Emms, 1990; van Vliet--, 1990b). However, in all instances the national governments enacted legislation and appropriated funds required to ensure the low-income population of access to housing.

### Differences in Physical Form

The distinction between welfare states and nations whose economies are more private-profit oriented, in part, parallels differences in physical and locational characteristics of housing. Market systems commonly feature extensive low-density neighborhoods. They are frequently found on the periphery of established urban centers. They often exclude nonresidential land uses. A predominance of detached dwellings is characteristic. The literature contains ample discussion of the reasons for such development. A traditional explanation refers to market forces that have responded to consumer choice. Families in particular have indicated preferences for suburban environments as a place to raise children. Among the reasons cited are safety, open space, better schools and the availability of single-family dwellings with a private yard. Researchers have argued that federal policies have significantly contributed to suburban (rather than urban) development (Feagin and Parker, 1990). They mention, in particular, the interstate highway program and housing programs (notably mortgage insurance). Of course, federal policies are not created in a vacuum. Rather, they reflect a balance of contending forces. In this connection, the real estate industry, lending institutions, developers, builders, automobile manufacturers, oil corporations, and labor unions in these sectors, have all lobbied heavily in favor of suburban development.

Over the last two decades, many studies have examined behavioral implications of suburban environments (e.g., Michelson, 1977; Popenoe, 1977; Rothblatt et al., 1979). The findings have often been critical of the poor accessibility of community services and facilities and the difficulty to maintain informal local social networks. This research has focused particularly on women and children. In recent years, however, the suburban population has aged. Demographic data show a "graying of the suburbs" (Welfeld, 1987; Golant, 1990).

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This trend has been accompanied by growing concerns regarding how well these low-density residential environments support the elderly's needs (e.g., Logan & Spitze, 1988).

In the welfare states mentioned earlier, consumers' attitudes have traditionally been more accepting of higher density housing. Preferences for single-family dwellings have also not materialized as extensively, in part, owing to lower levels of affluence. More importantly, government has tended to undertake and regulate residential construction more in an overall context of land-use planning which generally did not favor low-density residential development. Welfare states also had to consider investment of their more limited resources in terms of cost-effectiveness vis-a-vis their other domains of responsibility such as education, health care, and military defense. Accordingly, one finds less suburban sprawl in welfare states. As a rule, residential development tends to be contained in planned entities, at higher densities, comparatively better served by public transportation, and more mixed with non-residential land uses (Popenoe, 1985).

### **A Comparison of Housing for the Elderly**

The provision of housing for the elderly in the United States and the Netherlands should be viewed against the more general backgrounds just sketched. A comprehensive comparison is beyond the scope of this paper. The following discussion focuses on three dimensions. It first identifies a shared characteristic: a high level of residential satisfaction. Next it examines differences in tenure distribution. These differences are of interest because they make clear that residential satisfaction is not necessarily linked to private homeownership. Finally, the comparison will review housing expenditures. Affordability is obviously important in a time of government retrenchment, reduced subsidies, and tightened eligibility requirements.

### **Satisfaction with Housing**

Both the U.S. and the Netherlands have eliminated absolute housing shortages--that is, in both countries there are more housing units than there are households. Following the attempts to remove quantitative housing deficits--successful in the aggregate--concerns shifted to more qualitative aspects of housing. The result has been remarkable improvements in living conditions. In the U.S. as well as the Netherlands, census data show that only a very small proportion of the housing stock does not at present satisfy basic criteria of comfort and health (e.g., flush toilet, bath/shower, heating, hot water). These objective indicators of housing quality are reflected in the subjective evaluations of elderly residents. Table 1 shows data from the most recent American Housing Survey, which reveals a high level of satisfaction with the dwelling structure and the neighborhood. Previous research has found similarly high satisfaction levels among elderly households. For example, Lawton (1980, ch. 3) reports two national studies--in the first, 83 percent of the elderly respondents evaluated the quality of their housing as either "good" or "excellent;" in the second study, 79 percent of the elderly indicated they liked their housing "very much," and an additional 18 percent liked their housing "fairly well." What we see, then, is a rather stable and high level of residential satisfaction among U.S. elderly.

Dwellings in the Netherlands tend to be smaller than in the United States. On average, there are also fewer rooms per dwelling (4.0 vs. 5.3) and more persons per room (.64 vs. .47). However, a significant proportion of the housing stock has specific design adaptations responding to the elderly's needs. It is not surprising to find, therefore, that a majority of the Dutch elderly express a high degree of satisfaction with their housing situation: about 90 percent are either satisfied or very satisfied (see Table 2). In another nationwide study conducted in 1988, 88 percent of the respondents described their housing as "pleasant." Those with negative evaluations typically mentioned aspects of neighborhood as the source of their dissatisfaction (U.S. Bureau of Census, 1988) (see also the slightly lower neighborhood satisfaction level in Table 1).

The predominantly positive assessments of their housing by U.S. as well as Dutch elderly should be seen in context. For example, the elderly tend to compare the current housing situation to generally inferior circumstances earlier in life, rather than to that of other groups

Table 1. Overall opinion of housing structure and neighborhood by elderly households in U.S., 1989 (%).

Level of Satisfaction <sup>1</sup>	Housing Structure	Neighborhood
Low	1.4%	3.0%
Medium	16.6	18.8
High	82.0	78.2

Note: 1. Rated by respondents on a scale of 1 (worst) to 10 (best).  
Low = 1, 2, 3; Medium = 4, 5, 6, 7; High = 8, 9, 10.

Source: U.S. Bureau of the Census (1988).

at the same point in time. Many elderly are also attached to the home and neighborhood where they have lived a long time and are reluctant to move. Moreover, alternatives that include both a suitable dwelling and a suitable neighborhood tend to be limited. The elderly's knowledge about such alternatives is also restricted. Nevertheless, in spite of these caveats, it is possible to conclude that, in general, the elderly in the U.S. and the Netherlands enjoy a relatively high standard of housing. A comparison of other aspects of housing, however, reveals important differences.

Table 2. Residential satisfaction of elderly householders by age group, the Netherlands, 1985/86 (%).

Residential Satisfaction	Age Household Head		
	55-64	65-74	75 or older
very satisfied	42.6%	46.8%	52.0%
satisfied	46.5	43.7	40.1
dissatisfied	11.0	9.5	7.8

Source: Serail (1988, pp. 26-27)

### Housing Tenure

One difference that clearly stands out is the pattern of housing tenure. In the United States, there is an historically strong ideology of private homeownership (Marcuse, 1990). In 1985, nearly 75 percent of householders aged 65 and over owned their dwelling, about 80 percent of them without mortgage debts. The Netherlands, on the other hand, has a long-standing tradition of rental housing (NWR, 1988). Private homeownership rates have only recently begun to rise, for the most part as a result of government incentives and then chiefly among the younger generations. Hence, in 1985, less than one-third of Dutch householders aged 65 and older owned their home (see Table 3).

The different tenure pattern found in the Netherlands is significant in that it demonstrates that it is possible to obtain a high level of residential satisfaction in a housing system that is dominated by rental tenures. In the Netherlands, only 1.1 percent of owners and 4.7 percent of renters indicate that they find the dwelling they occupy unsuitable to their needs (Serail 1988, p. 117). However, in the U.S., renters typically rate their housing considerably lower than do owners. These subjectively perceived differences tend to reflect objectively measurable differences in actual housing conditions. These differences in housing conditions, in turn, derive from policies that benefit owners rather than renters. This lack of tenure

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neutrality has been observed for other market systems as well (van Vliet--, 1990b). The Dutch deviation from this pattern is significant in that it shows how the observed advantages of private homeownership are not inherent in that form of tenure. In other words, it is possible to create a system of housing provision that produces satisfactory conditions for a large majority of owners *and* renters. An implication of this observation is that policies intended to improve housing conditions and satisfaction need not automatically stimulate private homeownership.

Table 3. Housing tenure in the U.S. and the Netherlands, householders aged 65 and over (1985).

Tenure	U.S.	The Netherlands
Own	73.2%	31.5%
Rent	26.8	68.5
% of renters receiving subsidy	23.4 <sup>1</sup>	71.8 <sup>2</sup>

<sup>1</sup> Includes all forms of federal subsidies (e.g., direct loans, mortgage insurance, rental subsidies), but excludes state and local subsidies.

<sup>2</sup> Includes all forms of subsidies, except rental assistance (received by 30% of elderly households).

Source: NWR (1988); U.S. Bureau of the Census (1988)

### Housing Expenditures

A second important difference in the housing situation of elderly in the United States and the Netherlands is also brought into focus in Table 3: affordability. Elderly renters in the Netherlands live three times as often as their U.S. counterparts in housing built with some form of subsidy (71.8 percent versus 23.4 percent; see Table 3). In addition, about 30 percent of the Dutch elderly receive rental assistance payments to limit their housing cost burden to 16-19 percent of their income. In 1988, the most recent year for which data are available, 95 percent of new rental construction was subsidized by the central government (as was 35 percent of newly completed units for owner occupation). Rent increases are regulated by the government as well.

As a result, and shown in Table 4, elderly households in the United States spend a much larger share of their income on housing. This is so among renters as well as owners. According to an international rule of thumb, as a general norm, households should not have to spend more than 25 percent of their income on housing. The data in Table 4 reveal that in the United States in 1985, more than 3/4 of elderly renters and more than 1/3 of elderly owners exceeded this standard. These proportions are much higher than those seen in the Netherlands. (The differences are larger, in fact. In the United States the proportion is of gross income, whereas in the Netherlands it is of net income).

### Conclusion

This brief comparison of housing for the elderly in the U.S. and the Netherlands shows one commonality and two clear differences. In both countries, the elderly express a high degree of residential satisfaction. However, in the United States, private homeownership is the dominant form of tenure, whereas a majority of Dutch elderly are renters. Dutch elderly, irrespective of tenure, also spend a much smaller proportion of their income on housing. A policy implication of these findings has already been identified. In this conclusion, it is important to reiterate that the observed differences are closely related to differences in the place of housing in the national political economy. In the United States, housing is foremost treated as a market commodity. Its price is by and large a function of supply and demand. Ability to pay is an individual responsibility. By contrast, in the Netherlands housing is an entitlement,

Table 4. Housing expenditures as a proportion of income, householders aged 65 and older in the U.S. and the Netherlands, by tenure (1985).

Proportion of income spent of housing <sup>1</sup>	Renters		Owners	
	US %	NL %	US %	NL %
≤ 9	2.6	6	18.4	38
10-24	20.8	72.9	46.7	52
≥ 25	76.6	21.1	34.9	10.1

<sup>1</sup> United States: Proportion of gross income. The Netherlands: Proportion of net income.

Source: COSBO (1991); U.S. Bureau of the Census (1988).

anchored in the national constitution (van Vliet--, 1990b). Its provision is part of a broader commitment to social welfare that includes also education, health care and a wide-ranging array of social security measures. Financing is arranged through a system of sharing tax revenues which amount to almost 50 percent of GNP. The corresponding figure for the United States is about 29 percent. Along with that of Japan, it is among the lowest in the world. In the Netherlands there are also premium circuits, based on salary deductions and employer contributions mandated by legislation. As earmarked taxes, they provide guaranteed funds for a range of household and medical services that enable the elderly to stay in their own homes longer.

It may be interesting to note differences and similarities between the housing of U.S. and Dutch elderly. However, inevitably the question arises: What is the rationale for such comparison? The answer is often couched in policy terms: one wants to learn from the experience of other countries in order to develop (more) effective ways of dealing with the same kinds of problems. Considering the embeddedness of housing solutions in (widely divergent) broader national contexts, the issue of transferability is important. In this connection, the concept of innovation is useful. Innovation represents a qualitative change. An important aspect is that it is defined by local baseline data. Therefore, something that represents an innovation in the United States is not necessarily also an innovation elsewhere, and vice versa.

Finally, it is necessary to bear in mind an important aspect of housing provision for the elderly: cost. Here, an important distinction must be made between the cost of provision born by individual households and that born by society. As shown, Dutch elderly pay a much smaller proportion of their income on housing than do U.S. elderly. This is not to say that Dutch housing is produced in a more cost-effective manner. It is the distribution of cost that is different. National government, acting on the "housing as a right" principle, heavily subsidizes housing costs of low-income households. For example, in 1986 the Dutch central government expenditures on rent allowances and subsidies for the construction of rental housing amounted to about 2.75 percent of per capita GNP. The equivalent U.S. expenditure would have been about 114 billion dollars. In 1988, the total of U.S. tax expenditures on rental housing plus outlays for public and subsidized housing was barely 10 percent of that amount. A tenfold increase would require not only a radical reevaluation of the priority of the rental sector, but also a rearrangement of the priority of housing in overall budgetary planning. Any attempt to adopt housing solutions from one country to another country must carefully consider these broader contexts as frameworks for intervention.

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Credits: This paper is based on a project supported by the Council for Research and Creative Work of the University of Colorado.

Note: Any remaining housing shortages are relative. For example, even though housing units may be available, they may not be appropriate for particular household relative to their location, price or design characteristics. Questions of relative housing shortage are not the focus of this paper, except insofar as they relate to affordability.