

**THE NEED FOR A COMPARATIVE APPROACH TO HOUSING EDUCATION IN THE UNITED STATES**

Omer Ertur

**Introduction**

During the past 20 years, most planning programs in U.S. universities, particularly those with an increasing number of international students, experienced bifurcated curricula adjustment. The curricula adjustment resulted in a lack of integrative and collaborative pedagogic techniques to utilize comparative phenomena. Rather than combining American and international issues into one curriculum of a comparative nature, most programs were re-structured to isolate and independently emphasize singular issues of importance, e.g. housing policy in the U.S., housing problems in urban America, etc. A lack of faculty trained in comparative analysis may have resulted in an underemphasis of the comparative teaching approach.

The existence of separate courses in American housing issues and Third World housing issues is not unusual in planning programs. The concentration of American students in the American housing class, and international students in the Third World housing class, comes as no surprise to housing educators. Although each class undoubtedly contributes to its student-clients, a more substantive and contributive education would be achieved if each course were repeated on each set of students. The result of a cross fertilization of ideas within American and international housing experiences would be beneficial to each group. The best educational results, however, would be achieved by combining the separated student clientele into one class with a comparative curriculum base, utilizing both American and international housing experiences (Makela & Tripple, 1989). The objective of this paper is to investigate the possibilities and the rationale for structuring a comparative approach to housing education.

**A Comparative Approach**

There are many different approaches to teaching a course in comparative housing. A comparative approach is academically intimidating. There are inherent dangers of over-extending the concept of "comparativeness" to include all possible aspects of the housing phenomenon, and all possible intra- and international entities. There must be limits to the comprehensiveness of a comparative approach to housing. The following suggestions will assist in establishing applicable guidelines.

In constructing a curriculum of comparative housing, one must first consider the course's practicality and relevance to current housing circumstances, issues, and policies. A process of selection and prioritization of global housing concerns is essential to designing a realistic and implementable comparative teaching approach.

A second aid to avoid over-comprehensiveness is the selection of a set of countries which best represent current housing circumstances, issues, and policies. The selection process may be affected by the interests and background of the teaching faculty and students, and thus reflect the particular academic environment. Dynamic and flexible comparative representations of global housing phenomena are essential.

Thirdly, in relation to the curriculum component, it is practical to focus on three broad global categories of "places," "issues," and "strategies." These categories are neither inclu-

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Omer Ertur, Ph.D., who has been a Professor of Community and Regional Planning at Iowa State University, is currently the United Nations Development Program Resident Representative in Turkmenistan.

sive nor exclusive, but rather illustrate a pedagogic model to assist housing planning educators in composing their own unique comparative approach to housing education.

**Places: “The East,” “The West,” and “The Rest”**

Comparativeness, as previously emphasized, requires the formation of a representative group of socio-cultural entities. Socio-cultural entities could include, in addition to nations, sub-sections within, and/or combinations of, several countries. A sub-national and supra-national understanding of housing issues and strategies should be preferred to international comparisons based on, and determined only by, contemporary political boundaries.

A comparative review of the public/private provision controversy among various developed world capitalistic and socialistic political systems may enhance the analytic capabilities of the students of housing by elaborating on the interdependency of housing policy content and affiliated political ideology. Depending on the political and ideological status-quo of their respective countries, the students may conceptualize the possible parameters of private versus public responsibility issues existing in their countries. Is there an over-emphasis of one at the expense of the other? One may develop a different perspective on this particular issue by comparatively reviewing the experiences of several developed countries.

The countries of the developing world, on the other hand, are more numerous and diverse in character, therefore, categorization similar to the developed country group would be inappropriate. One approach in constructing comparative categories within the developing world is to agglomerate countries based on their socio-cultural and geographical alignments. Examples of the approach would be Middle Eastern Islamic, Southeast Asian, North African, Sub-Saharan African, and Central American groups (Hardoy, 1981; Mabogunje, 1978; Mathey, 1991; Amis 1990). Comparativeness in housing could also be accomplished from the perspective of adherence to certain economic principles and/or political alliances. The politico-economic spectrum of countries, which may be represented in such a comparative approach, would vary from the rigidly capitalistic to the hardened communist affiliations.

In addition to ideological alignments, a narrower comparative representation may be achieved by organizing newly decolonized nations of past prominence (such as India and Malaysia) into one group, and newly emerged nations of tribal configurations (such as Zambia and Nigeria) into another group. Concurrently, some of the comparative housing issues and strategies may be analyzed from the perspective of historical determinism so that countries are categorized into externally influenced housing development patterns (i.e. colonial) and internally induced ones (i.e. traditional). This colonial experience-based categorization is suggested in order to identify and elaborate on the housing-related experiences of the decolonized world and to detect differences in housing problem-comprehension and policy approach.

**Issues: The “Housed,” the “Marginally Housed,” and the “Homeless”**

The global issues of housing to be considered for comparative analysis may be organized under three general categories: the “housed,” the “marginally housed,” and the “homeless.” Each category corresponds to a housing situation determined within a particular socio-cultural entity. In respect particularly to the housed and the marginally housed categories, what is considered “housed” in one socio-cultural entity, may be considered “marginally housed” in another, and vice-versa. Similarly, within the confines of physical permanence, homelessness in a sedentary and/or urbanized settlement would indicate a socio-cultural problem. On the other hand, in nomadic cultures homelessness is the natural order of the society (Rapaport, 1969; Low 1989).

In a comparative housing course, one of the initial and basic elements to be emphasized is housing problem identification and definition. With the exception of some nomadic societies, being “housed” and being “homeless” may be universally identified and defined. However, the challenge is to identify when, where, and under what circumstances a “housed” population may be identified as “marginally” (i.e. substandardly) housed (Perlman, 1976). A cross-section of countries with various definitions of sub-standardness in housing provision may allow the students to recognize commonalities, such as lack of personal

space, lack of basic needs (primarily water and sanitation), and inaccessibility to economic opportunities. (Low, 1989)

With these possibilities and limitations in mind, a carefully selected cross-section of socio-cultural entities may be used for a comparative analysis of: (a) the socio-culturally bound definitions and standards applicable to each category; (b) the historical and circumstantial reasons behind the existing problems in housing; and (c) the politico-economic and institutional bases of inequities in the distribution and inefficiencies in the production of housing.

**The "Housed."** In the capitalist industrialized nations, the housed portion of the population is distributed in varying degrees among all income-class groups. The housed population may be composed of low, middle, or high income groups. Regardless of the income-class identity, a housed population component may be comparatively studied under the following tenureship categories: private ownership, private rental, public assistance, and public provision (Bourne, 1981). Depending on the nature of housing within the countries under study, any of the income-class groups could belong to any one of the categories. In developing countries, public provision of housing usually means housing for civil servants and/or housing for middle and upper-income groups (Temple, 1980). In the United States only those of low income may qualify for inclusion in the public provision category; in the United Kingdom any income-class group may be included in the public provision scheme; and in Scandinavian countries, low income status is required for public housing assistance (Hallett, 1988). In the United States a broad income tax-based subsidy system covers basically all of the income-class groups capable of ownership. In some of the industrialized mixed economies, such as Singapore, public provision of housing based on ability-to-pay covers all income class groups and is gaining prominence over private provision of housing.

On the opposite end, within a staunch communist country such as China, tenureship is accomplished primarily by public provision. The income-class basis of housing distribution in the "West" is replaced in the "East" by a housing allocation system determined by bureaucratic and political influence groups (Szelenyi, 1983). Even though housing market activity is forbidden, restrictive private home ownership has been allowed in many socialist countries (Ball, 1976). Public provision of housing for all, according to need, has been the ideological basis for the distribution of housing in the socialist countries. In reality, however, distributive inequities based on bureaucratic status and/or political identity have prevailed (Hegedus, 1991; Di Maio 1974).

Among the nations of the developing world, inclusive of the Third and Fourth Worlds, the housed component of the population is comprised primarily of middle and upper income groups, military-bureaucratic affiliates, and political elites. This housed component represents the minority of the total population and resides primarily in the urban areas. Formulating a comparative base for the housed component of the developing world is a greater challenge than formulating a comparative base for the capitalist and/or the socialist block countries. A comparative housing analysis in the developing world should present a cross-section of developing nations with various sociocultural and politico-economic backgrounds in order to illustrate the different mechanisms, subsidies, and financing schemes involved in the provision of housing to the "housed" groups. Many of the developing countries' low income housing assistance and subsidies reflect the conceptual basis of past housing experiences in the developed world, especially the United States and Western Europe. Thus, an historical review of housing issues and policies of the United States would illustrate the income redistributive effects of direct low-income housing assistance programs (such as the Section 8 rental assistance program) and indirect housing subsidy policies (such as the income tax benefit of home ownership). At a much faster rate, many developing countries of capitalist or mixed economy orientations repeat similar stages of housing provision and policy development experienced in the United States.

**The "Marginally Housed."** The concept of "marginally housed" refers to the substandard quality of housing acquired by the majority of low-income households. It is appropriate at this point to emphasize the paradox of substandardness in housing. There are three methods to comparatively analyze the issues of substandardness in housing. One approach is the comparison of the housing status within a nation state. This approach addresses the question of how the system defines who is appropriately housed and who is marginally housed. Illustrations of unique and distinctly polarized case studies in countries of different

levels and types of development would greatly enhance the comparative understanding of the subject matter. For example, studies by Mabogunje (1978), Hardoy (1981), Grimes (1976), Dwyer (1975), McGuires (1981), Perlman (1976), Murison (1979), and Van Vliet (1990) provide excellent and well-illustrated cases of substandardness in the provision of housing in various countries.

The second approach in studying substandardness in housing is based on interpretations by external entities, such as governments of other nations, academics, and research institutions, of housing conditions within particular political systems. The interrelationship and interdependency among nations usually form the basis of external analysis of the substandardness of the housing. This external analysis applies particularly to developing countries which are at the receiving end of bilateral development assistance. Various studies indicate that, in comparison to local perceptions of housing substandardness, some external entities (e.g. World Bank, United Nations Center for Human Settlements, etc.) have exemplified pragmatic and realistic planning approaches in devising appropriate housing standards for site-and-services and slum upgrading programs. Analysis of differences between the internally and externally determined definitions of housing substandardness would enhance the comparative aspects of housing.

An international attempt to determine the parameters of substandardness in housing comprises the third approach. Many international organizations (e.g. United Nations World Bank) and multi-lateral aid agencies (e.g. United States Agency for International Development, British Overseas Assistance) are attempting to define globally accepted housing standards within the criterion of affordability (Mabogunje, 1978). The admirable efforts of these organizations have yet to produce appropriate measures of global housing quality. The formulation of an international standard of housing quality, a seemingly impossible task, might best be accomplished by concentrating not on non-static notions of what is standard housing for all, but rather on a dynamic and systematic orientation toward understanding internally determined and culture-bound procedures of housing satisfaction and affordability (Tym, 1984). The understanding of such procedures requires global comparative research to relate the myriad of socio-culturally determined housing satisfaction and affordability indicators to the politico-economically determined standards of housing.

The concept of the marginally housed indicates a need for improvement. It indicates dissatisfaction with housing provision and distribution. In this age of mass information and communication, the expectation of housing quality is rising via exposure to the ideal. The result is an increase in dissatisfaction with the housing status quo. This process of rising expectations is not unique to the developed world. Rising expectations, coupled with the rising number of marginally housed, create political pressure points around the world. Each pressure point is indicative of the inability of politico-economic systems to cope with the basic housing needs of the population (Pryer, 1991). However, the housing issues, with numerous policy-making implications, have not been yet recognized as a political problem (Rezende, 1991). Some expert opinions support the contention that housing is only a secondary problem, and may not be solved without broader economic development and income re-distribution policies (Mathey, 1991).

An investigation of housing conditions in the rural areas of many developing countries, for example, would illustrate the substandardness of a majority of the housing units. However, a comparative approach to the marginally housed section of rural settlements in various countries could be extremely challenging. There are many historical and geographic reasons behind the underdevelopment of rural settlements (Hardoy, 1981). Academic efforts to discover a comparable basis of housing sub-standardness in an economically depressed and depopulating rural settlement of a country in the developed world, and in an economically underdeveloped and depopulating rural area of a developing country, would be difficult. A commercialized, agriculturally-based, and economic dysfunction-related housing demise in a developed country's rural areas has little in common with the rural housing problems of a developing country with a subsistence-based traditional economy lacking in resources and technology. However, from the standpoint of exposure to knowledge, studies of a cross-section of housing issues, each relative to its own particular circumstances and environment, would expand the comparative horizons of a housing course and expose

many unexplored areas to substantive research, which might result in a common thread linking public policies to improve housing conditions.

**The "Homeless."** This category of the housing issue has received little attention until very recently. "Street people," "vagabonds," and "urban nomads" are the labels affixed to those people who have no domicile. Because their physical appearance contrasts so sharply to the prevailing social norm, the homeless in the developed world gained visibility. There exists in the developed world particularly, an unfounded prejudice against the homeless. The prejudice espouses that homelessness is the fault of, and the choice of, each individual. While this might occasionally and circumstantially be the case, it is also probable that being homeless is temporary. A different type of housing action must be taken to accommodate these individuals--housing action which recognizes and accepts the individuals' right to shelter for physical protection and survival, and housing action which offers socio-psychological guidance to enable these citizens to re-enter the mainstream of society. On the other hand, some of the homeless who are chronic urban nomads would require only temporary placement in institutionalized housing for protection against severe physical elements.

In contrast to the temporary nature of homelessness in the developed world, the problem in many of the developing countries is chronic. Within the developing world, homelessness is currently of greater magnitude than in the developed world. It is a result of interactions among the following factors: population growth; urbanization; insufficiency or under-development of resource capacity; ineffective and inefficient public administration; and redistributive inequities (Yeh, 1979; Grimes, 1976). The number of homeless, visible but unrecognized, will continue to grow substantially in the developing world.

The issue of homelessness may become the focal point of housing research in the 1990s, just as squatter settlements and low-income housing was the focal point in the 1970s. In a comparative sense, research may provide cross-cultural explanations of the differences between the temporary and chronic nature of homelessness (Orr, 1990). Research may also explain that circumstances which are determined by socio-economic and cultural variables contribute to homelessness. Case studies of various aspects of, and reasons for, homelessness are being conducted in different economic and socio-cultural environments. An analytical base is currently being formulated for future comparative understanding of the plight of the unhoused, through which the controversial global issue of the right-to-shelter may gain international prominence and recognition.

#### **Strategies: From Non-intervention to Intervention**

Depending on socio-cultural and politico-economic variables, and on the particulars of housing issues, each country responds uniquely to problems. From the perspective of housing as a social responsibility, intervention in the production and allocation of shelter may be a natural reaction. Within this frame of reference, housing would acquire the status of a right, such as rights to privacy, education, and expression. This concept of a right to housing would extend beyond the policy of a *goal* for housing, as expressed in the U.S. Housing Act of 1949 "... a decent home and suitable living environment for every American..." (Fish, 1979)

Establishing housing as a "right," coupled with a strategy of strong state intervention, has been one of the primary objectives of the socialist block countries. However, there are dramatic variations in the implementation of interventionist strategy. Despite the objectives of the housing policy, and due primarily to socio-cultural reasons, there have been inherent inequities in the housing allocation process among countries of the socialist block. While in the provision of housing some households have been better off than others, the objective in the socialist system has been that no one be housed below an agreed-upon minimum standard. However, depending on the level of and human natural resource development, countries of the socialist block exhibited differences in minimum standards. Some of the countries in the socialist block may have emphasized improvements in rural housing, while others may have concentrated on upgrading urban housing conditions. While some of the socialist countries adhered strictly to a public provision of housing (such as the Soviet Union), others (such as Poland) allowed the operation of a privately organized housing market (Ball, 1976; Di Maio 1974; Friedrichs, 1986). While more than two-thirds of the housing in Singapore is publicly provided, almost 100% of housing in Outer Mongolia is privately owned.

Among the capitalist group countries, a variety of housing strategies operate within a range from non-intervention to partial intervention in housing market operations. Under most of the non-interventionist strategies, indirect policy measures (e.g. land use regulations and/or social and physical improvements) have substantial effects on housing market activities (Van Vliet, 1985). The spatial and qualitative aspects of housing production and allocation are determined by the type and magnitude of public investment into settlement structures. Similarly, taxation policies which affect the pricing of - and consequently production and consumption of - housing may result in an undersupply of new housing and in an undermaintenance of the existing stock (Peterson, 1978). On the other hand, direct subsidies into certain non-housing areas could result in housing-related reverberations in the price structures. In contrast, some housing-oriented indirect subsidy policy measures may end up affecting, to a relatively greater degree, areas of non-housing, such as employment, migration, and transportation.

While supporting the operations of the private housing market, which allow a housing choice for individuals and households willing to pay, most of the mixed economies of the developed world accept a rather basic level of public responsibility toward the production and provision of housing for certain income class groups (Applebaum, 1985; Kemeny 1978; Wiktorin, 1982). Among the mixed economies there are substantial differences in strategies to accomplish public production and/or provision of housing to certain groups. While some countries of social-democratic alignment rely on various forms of direct subsidy schemes operating within the market, others may choose to emphasize publicly owned and operated housing provisions and/or publicly subsidized housing cooperatives. A thorough review of the rationale behind the variations of public/private mixture in mixed economies would assist a student of housing to comprehend the principal elements and threshold points of a balanced public/private responsibility.

A comparative analysis of housing policies among the socialist, the capitalist, and the mixed-economy countries is essential to understanding the conceptual differences in defining an appropriate and just allocation of housing. The centralized administrative systems of the socialist group allow direct intervention into, and control of, housing production and distribution processes. On the other hand, the inherently decentralized administrative systems of the capitalist countries utilize non-interventionist, indirect methods (such as tax deductions) to affect the demand and supply functions of the housing market. This non-intervention approach to the housing process in the developed capitalist group is a natural component of an approach which accepts housing as a private responsibility of individuals and households, not as a publicly supported "right."

Substantial variations exist in policy approaches to housing problems among the countries of the developing world. While some governments of the developing world give priority to housing policy implementation, most governments provide only empty promises. There are definite acute housing shortages in nearly all of the developing world. Tremendous population shifts from rural to urban areas since the end of World War II have created shortages of housing at the highest level (Burns, 1977; McGuire, 1981). Reactive and negative interventionist policies, which tried to eliminate the problem by erasing the symptoms, have spread to many developing country governments. For example, urban-fringe squatter settlements in developing countries have been destroyed, only to reappear on the other side of the city. Current policy approaches to squatter settlements are relatively more positive and constructive. Most of the housing interventionist strategies in the developing World are partial policies emphasizing self-help based improvements and site and service schemes (Amis, 1990). Legalization of ownership, standardization of basic housing quality, and provision of public services are examples of the squatter upgrading strategies that have been, and are being, applied in some developing countries.

Globally, and regardless of ideological orientation, spatially identifiable areas of housing degradation are prominent in older, centrally-located neighborhoods of major urban areas. Within the spectrum of intervention-nonintervention, a challenging comparative approach would be identification, description, and evaluation of specific policies dealing with urban neighborhood decline in various economic and socio-cultural circumstances. For example, to what extent does the success of a slum improvement program rely on its non-housing components, such as employment generation and skills-training? Also, in a comparative

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sense, what is the degree to which a successful program has relied on a balanced mixed land-use strategy to strengthen the community economic base?

In developing countries there exist variations in policy of urban low-income housing provisions, as well as variations in rural low-income housing policy. In many developing countries, fully developed strategies to improve rural housing are non-existent. Since the formation of UNCHS-HABITAT in 1976, some of these countries, particularly in sub-Saharan Africa and South East Asia, have taken steps to improve the housing conditions of the rural poor. However, most of the policies are ineffective because of insufficient locally- and/or internationally-acquired funds (Hardoy, 1981; Amis, 1990).

Many of the quickly urbanizing agrarian countries of the developing world formulate policies to improve rural housing conditions as an incentive for people to remain in the rural areas. Most of these policies are not fully implemented. Those policies that have been implemented have not produced what was expected in terms of curtailing urbanization. Programs in many developing countries have lately concentrated on self-help housing improvements. Combined with appropriate technology programs, some of the self-help rural housing improvement programs in underdeveloped countries are expected to upgrade rural living conditions (Hardoy, 1981; Amis, 1990).

One of the prevailing and controversial housing policy issues in countries of the developing world is not whether there is an implementable low-income housing policy; rather the issue is public subsidy programs to assist the production, distribution, and acquisition of middle- and upper-income housing. Depending upon internal political alignments, many developing countries exhibit a preference for provision of housing to middle- and upper-income groups. Various forms of direct and/or indirect public subsidies, tax concessions, and land development investments are granted in urban areas intended to be settled by people of above-average income (Kemeny 1978 & Tym 1984). One assumption behind such a regressive housing assistance policy may be that, through the housing filtration process, the supply of housing to low-income households is being expanded. At present, there is a great need to comparatively analyze and determine the plausibility of the housing filtration assumption and to identify circumstances wherein it may be successful. Developing nations have an opportunity to put together a comprehensive housing strategy which includes filtering within both the formal and informal housing sectors (Baer, 1991).

### **Recommendations**

Many aspects of housing contain basic principles which refer to housing as an economic commodity, a social good, and a public service, despite considerable variations which may exist in different socio-cultural circumstances (Bourne, 1981). Concurrently, prior to any substantive discussion of comparative housing issues, major elements of housing analysis should be introduced to the class. A brief, but basic, housing core review is essential to familiarize the students with relevant and contemporary concepts, definitions, and attributes of housing analysis. Illustrations and explanations of housing production and allocation should clearly identify the principal agents and institutions, private or public, behind these processes. Commonly used terms and concepts in housing analysis, such as housing turnovers, vacancy rates, household formation and size, cost-to-income ratio, and various mortgage approaches should be explored. Basic elements of housing production and housing market operations should be introduced and explained. Special emphasis should be placed on the principles behind the housing allocation processes within various socio-economic contexts. An introductory housing core review should also include general coverage of the sources of housing information related to comparative trends in housing standards, housing need, housing investment, and public subsidies.

Following a solid review of the housing core, an issue and strategy oriented comparative housing base should be formed. A carefully selected cross-section of examples and illustrations from various countries should follow the introduction of the comparative housing base. The process of selection should be based on country-specific experiences of particular housing issues and/or strategies. The emphasis is to clearly illustrate the issues and solutions of the housing dilemma which may have a common denominator. Housing in all parts of the world is an extremely complex socio-economic phenomenon to which there is no sim-

ple answer, except that we must learn from each other's experiences so that our successes may be repeated, and our failures not recur.

### Conclusions

The influx to the United States of international students, particularly from the developing countries, creates a unique opportunity to introduce a comparative approach to housing education. After exposure to a comparative housing course as described in this article, the international students may develop a framework which facilitates the formation of unique and innovative perspectives on housing issues and policies in their respective native countries. Achievement of this goal necessitates a comparative housing base flexible enough to allow the students' particular and country-specific experiences in housing to become a part of classroom operations.

A rigidly designed comparative housing curriculum, confined to the competencies and experiences of the instructor and/or to the media-based state of the art configurations of current global housing issues, will not result in a desired comparative learning experience. Flexibility of curriculum, an essential component of participatory pedagogy, results in an exchange of information and ideas to aid in conceptualizing different perspectives of housing issues and policies. Consideration of the overall composition, characteristics, and interests of the class is needed to effect the appropriate changes in curriculum and to emphasize particular criteria in order to enhance the students' understanding housing globally. Such consideration does not necessarily entail a loosely structured class, oriented entirely to the expectations of the students. However, it does necessitate the presence of a substantive housing core which provides a basis for comparative illustrations of selected issues and strategies of housing. What is being highlighted here is that the process of selecting, prioritizing, and emphasizing certain housing issues over others should not be pre-determined, but rather should be made dynamically throughout the class meetings. As new issues and strategies of housing appear, necessary adjustments must be made in the format of the housing course in order to maximize the comparative aspects.

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