

Implementing Smoke-Free Policies in Public Housing

INSIGHT FROM LOCAL PUBLIC HEALTH STAFF AND PUBLIC HOUSING
PROPERTY MANAGERS

Implementing Smoke-Free Policies in Public Housing

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Executive Summary

Individuals from low income groups have a greater risk of secondhand smoke exposure in their homes than those from higher income groups. This disparity is largely due to limited access to quality housing. Local public health staff in Minnesota worked with public housing property managers and owners to evaluate existing smoke-free policies and support the implementation of new smoke-free policies through the Statewide Health Improvement Program (SHIP).

The Minnesota Department of Health (MDH) designed an evaluation of this work. The goal of the evaluation and this report is to inform SHIP grantees of the barriers that are faced by local public health staff and property managers in implementing and enforcing smoke-free housing policies. This report also provides strategies and factors that can help implement and enforce the new policies.

Despite some differences in resident composition among participating properties, the responses of local public health staff and property managers highlighted several key factors that helped overcome implementation and enforcement barriers. Factors that led to success included educating staff and residents on the adverse health effects of second- and third-hand smoke and the economic benefits of going smoke free, and practicing consistent enforcement policies.

Property owners and managers were able to overcome key challenges to implementation and enforcement, including limited staff capacity and difficulty in proving lease violations. In fact, most saw positive results from policy implementation and enforcement, with several reporting that resident compliance surpassed expectations.

Introduction

Individuals from low income groups experience a disproportionate burden related to the harms of smoking compared to individuals from high income groups.¹⁻³ One factor that contributes to this disparity is that people with lower incomes have a more limited access to public housing (which is defined as public or private housing that costs no more than 30 to 40 percent of a household's annual income) that is also smoke free.

Property managers and owners across Minnesota have led successful efforts to implement and enforce smoke-free housing (SFH) policies through the Statewide Health Improvement Program (SHIP). However, little is known about the barriers and factors that limit successful facilitation, implementation and enforcement of SFH policies at public housing properties statewide. The Minnesota Department of Health (MDH) designed an evaluation of the SFH work being conducted through SHIP to investigate policy implementation strategies and challenges.

New SFH policies were implemented and enforced with the help of SHIP grantees (i.e., local public health [LPH] agencies), and Technical Assistance (TA) agencies such as American Lung Association (ALA), Public Health Law Center (PHLC) and Association for Nonsmokers-Minnesota (ANSR), as well as property managers and owners who are dedicated to the effort.

In 2015, in an effort to gain understanding of the barriers faced in implementing SFH policies, MDH interviewed 12 staff members of LPH agencies and 20 managers or owners of properties that have implemented policies. Through analysis of these key informant interviews, MDH identified key factors that facilitate successful policy implementation and enforcement. This report summarizes the findings from the evaluations, including barriers to implementation and enforcement, and strategies needed to overcome these barriers. This report will summarize lessons learned by property managers and LPH staff and reflections regarding the process of implementing a new SFH policy.

Methodology

LPH staff members who worked with SHIP on the public housing properties smoke-free policy were invited to be interviewed in summer and fall of 2015. LPH staff and TA agencies were asked to provide contact information for public housing property managers who they thought might be interested in participating. Property managers were then invited via phone to participate in an interview. Those who did not respond after three attempts to schedule an interview were dropped. Participating property managers received a \$25 gift card.

Participant Details

Eleven rural and nine urban public housing property managers were interviewed. Eight rural and four urban LPH staff members were also interviewed. The property managers gave estimates of the number of residents at their property who smoke, which ranged from 2 percent to 50 percent, with a 25 percent average rate of resident smokers across all participating properties.

Participating properties had smoke-free housing policies that had been in effect from two months to eight years at the time of the interviews. Twenty-five percent of the policies covered the whole property (both inside and outside) and 65 percent of the policies included e-cigarettes. Nearly all of the property managers interviewed reported having residents who were either elderly or had special needs. They also reported some residents faced language and cultural barriers, primarily for residents of Russian, Somali and Latino descent.

Addressing Barriers to Implementation

Some property managers experienced little or no opposition when the new SFH policies were implemented. Several of the cases, however, required specific strategies to overcome resistance from staff and/or residents. There were negative staff and resident perceptions, and the belief that residents have a right to smoke or might lose their residences. There were also enforcement difficulties; a fear that residents will move; and limitations in the staff's priorities and capacity to enforce the policy.

Respondents discussed how misperceptions of the SFH policy could be changed through education and by providing resources that could motivate property managers to assist in policy implementation. LPH staff and property managers discussed strategies they used to overcome implementation barriers and to change resident, staff and board perceptions that ultimately encouraged successful implementation. The following section of this report discusses barriers that emerged during implementation of SFH policy, with each barrier followed by a discussion of strategies that were used to address that barrier.

Barrier: Reception of Smoke-Free Policy

LPH staff experienced a range of reception of SFH policy during their outreach attempts. While some managers were ready and willing to implement comprehensive SFH policies with no convincing needed, others saw the policies as potentially detrimental to their properties or residents.

Engaging property managers in conversations about SFH policy was also a challenge in some cases. A LPH staff member described efforts to bring property managers to a Lunch and Learn

session: “We had LSF (Live Smoke-Free) informational meetings and only two people would show up.”

Some LPH staffers discussed this lack of engagement or a resistance to SFH policy as a result of property managers having other, all-consuming priorities. “In our discussions,” explained a LPH staff member, “we thought maybe [SFH policy] just wasn’t a priority because they don’t have issues with finding renters so they don’t see the benefit as much, or maybe they don’t have time because housing poses its own challenges.” In other cases, a property manager expressed interest in implementing SFH policy, but was working under a board, or upper management that did not see it as a priority, thus preventing the implementation process from advancing. As one LPH staffer said, “[Property managers] are not negative... [there is] just no real desire to move forward... [property managers] would say ‘I know upper management isn’t going with this so I don’t even want to try right now.’”

In some cases, property managers feared that implementing a SFH policy would cause them a loss of profits by forcing some of their long-time tenants to move away. “The main reason for not going smoke-free is that they have too many tenants who smoke and they are afraid of losing business,” an LPH staffer said. “I hear that complaint from most property owners.”

Potential Solution: Utilizing Economic Impact Data and Third-Party Resources

Many third-party agencies discovered that one of the most effective motivational tools for policy change is the high cost to turn over smoke-damaged units. Property managers also utilized the economic argument when convincing resistant upper management or boards of the value of SFH policy at their property. One property manager argued effectively that the properties are supported by taxpayers and it is the board’s responsibility to keep costs down. By going smoke free, they explained, damage to units from smoking can be kept to a minimum.

In one incident, a particularly expensive turnover that was caused by damage from smoke was described to the board. “There was one case that was over \$4,000,” explained one property manager. “They pretty much had to redo the entire apartment because the previous tenant smoked.” This example encouraged the board to approve a smoke-free policy. In addition to property-specific data, national data on the economic impact of smoke-free policies proved useful when used by LPH staff and property managers to convince property decision makers to implement a new policy.

Third-party agencies also provided resources to property managers and formed supportive relationships that proved to be crucial in overcoming several implementation barriers. Many property managers described how agencies including LPH, ALA, PHLC and ANSR played an important role in the implementation of SFH policy at their properties. These third-party agencies provided flyers, signs, and policy templates. As one property manager described:

Live Smoke-Free gave us lots of resources, the signage was the most useful. They were very accessible. We were able to get someone to come out and speak to residents, talk to us and give us a letter to send out. They created an addendum for our leases and provided all of our signage for the property. They've been amazing.

For property managers, the resources meant less work and time required to implement the policies at their properties. The resources provided by third-party agencies ensured easier implementation of SFH policy, and reduced some of the resistance from staff that LPH and other third-party agencies initially faced.

LPH staff discussed their relationships with managers and owners who did not initially go forward in implementing SFH policy. In these instances, LPH and TA agencies were patient, yet persistent, in their outreach. LPH agencies found that policy acceptance was often a matter of timing. LPH staff were available to assist property managers with SFH implementation whenever a long-time smoker moved out or there was a staff change that led to a property becoming more open to SFH policy. "I didn't push it or bug them," a LPH staff member said. "I just told them that I was here for them when they were ready."

Barrier: Resident Rights

The perception that smoking is a right was a common theme among residents, and was often considered a barrier to policy implementation. Some residents argued that their apartment is their own space because they pay rent; therefore, they believe they should be allowed to do anything they want that is legal, including smoking. "A lot [of residents] were not happy about us telling them what they could and could not do in their own home," a property manager said.

Some property managers and owners were also concerned that a smoke-free policy would impact their residents' right to housing. Smoke-free policy was considered by some to put low income, elderly or disabled residents at risk, as their options for affordable housing were limited. Losing their housing as a result of violating no-smoking changes to property policies may result in a lack of housing options for some public housing residents. "As a housing of last resort, [property managers] do not want to ban [smoking] and make people risk losing their last housing option," explained one LPH agency representative.

Additionally, property managers discussed their concern for residents with limited mobility who aren't able to easily go outside or off the property in order to comply with the policy. Some property managers believed it would make implementation difficult. "What do you do with residents who are homebound smokers?" a LPH staff member asked. This concern was repeated by some LPH staff members, owners and property managers. Conversely, others brought up the fact that many nonsmokers also have limited options for housing, and are frequently exposed to harmful SHS in their homes, by no choice of their own.

Potential Solution: Third-Party Agencies Providing Education

In addition to providing resources, third-party agencies also play an essential role as educators. LPH, and TA agencies were frequently involved in educating residents about the adverse health effects of second- and third-hand smoke and educating staff on creating fair, legal policies. The Public Health Law Center brought legal advice, and clarified that residents do not have a legal “right to smoke” in their homes. Third party agencies held resident question-and-answer sessions to give information on the policy and provide evidence on the harmful effects of second- and third-hand smoke. “This new third-hand smoke,” explained one property manager, “seeing what they pull out of smoke-damaged units, and what tests show is still in units even after extreme cleaning and sealing really made an impact.”

Third-party agencies convinced resistant residents that there are substantial health benefits to a smoke-free policy. These agencies also were able to encourage a change in resident conversations, dispelling the myth of a right to smoke in units, and emphasizing the nonsmokers’ right to have clean air in their homes. These resident meetings were fairly effective, particularly when legal agencies such as the Public Health Law Center were involved.

Third-party agencies also assisted in facilitating feedback and input from residents to give managers an idea of how many residents were in favor of SFH policy. In some cases, they used resident surveys to get feedback, and provide managers with concrete numbers of residents in support of the policy. This information helped inform staff of residents’ perceptions in addition to educating residents on smoke-free policies. Some of the data proved to be effective and provided boards and staff the supporting evidence needed to implement SFH policy changes at some of the properties.

There were a few cases, particularly those where it seemed likely that surveys would yield overly negative responses, where the surveys were replaced with question-and-answer sessions with residents. This gave residents a platform to voice concerns and have them addressed by LPH and TA experts. With both strategies, incentives (gift cards, food for resident meetings) helped ensure input from more than just the most vocal residents.

Barrier: Inaccessibility of Smoking Areas

Some property managers addressed the unique requirements of special needs residents during interviews. Managers sought to balance appropriate accommodations for smoking residents who have limited mobility with consistent enforcement policies. In some cases, implementation barriers and policy enforcement issues arose as a result of a desire to be consistent with enforcement. A few special needs individuals who were smokers (and in some cases their family or friends) brought concerns about the inconvenience that a SFH policy would create for them, given their limited mobility. Some property managers also saw weather as a factor that contributed to enforcement problems by further limiting residents’ ability to smoke outside. “The few tenants that would not sign our policy stated they were elderly and could not go outside, especially in the winter months,” said a property manager.

This was primarily an issue at properties that require residents to leave the property to smoke. Managers of properties that already have designated outdoor smoking areas tend not to encounter as much difficulty in making accommodations, as it is easier to ensure that these smoking areas are accessible for all of the residents, including those with special needs.

Property managers who encountered concerns of the inaccessibility of smoking areas often utilized arguments against smoking that centered on the harmful health effects. Many managers seek to emphasize their support of people with limited mobility in their smoking cessation efforts rather than try to provide them with areas to smoke. “We considered [making accommodations] but we felt that, regardless of what their individual needs are, helping them to smoke was not helping them,” one property manager said.

Another property manager defended the policy to the husband of a resident with limited mobility: “If he was concerned about her safety he should be just as concerned about her smoking because that is more dangerous to her health.”

Potential Solution: Strengthening Cessation Support

Third-party agencies frequently provide cessation resources including flyers and cessation program referrals. Onsite social workers were also available for one-on-one cessation meetings at a few properties, and they provided resources and support for residents who want to quit.

Agencies frequently discussed the importance of cessation support in facilitating policy implementation and enforcement by decreasing the number of smoking residents. Managers who had on-site staff cessation support in addition to brochures reported a greater impact of cessation support at their properties. Property managers and owners who are only able to provide flyers and referral information for cessation efforts often described these efforts as disappointing, underutilized, and ineffective.

Property managers and owners often discussed a need for TA and LPH staff to emphasize cessation during the implementation process. They discussed the importance in ensuring that residents have the opportunity and the ongoing support to quit smoking. Many managers expressed a belief that an increase in cessation efforts and effectiveness of cessation could make it easier to implement and enforce a smoke-free policy.

Enforcement Barriers and Strategies for Success

Policies for SFH Enforcement

All participating property managers required residents at their properties to sign updated leases or lease addendums to continue living in buildings once SFH policies were in place. In

many cases, TA or LPH staff were involved in the signing of the policies and were available to go to the property to support property managers and answer resident questions. Many managers felt that involving third-party agencies will ensure that residents fully understood the new policy.

Many of the participating properties have similar enforcement strategies. A smoking violation results in up to three verbal or written “strikes” or warnings before an eviction process would begin. Some properties consider resident reports of another resident smoking to be a strike, while others require that reports come directly from staff members who witnessed the violation. Actual evictions due to noncompliance are rare. Property managers generally tried to work with residents to come to a mutual lease termination if noncompliance continued.

Proving Lease Violations

Some respondents reported difficulties in proving policy violations, particularly in buildings with outdated ventilation systems that circulate air from all of the units together. This is one of the biggest barriers to enforcement. “How do you catch them without actually seeing them?” some of the property managers asked. “We can’t go into their apartments and if we do they say the smell is residual.” Another manager echoed this, saying “Someone would have to see [a smoking violation] in order to give out a warning. We can’t do it based on smell alone.”

Without proof of the violation, property managers were worried that they could wrongly accuse residents of lease violations or that their lack of sufficient evidence could hinder potential evictions. As one property manager stated: “If we did have to take a resident to court for eviction... we would need evidence to actually accuse or convict someone of a lease violation.”

Limited staff capacity also created some difficulties in proving violations at some properties. “We don’t have 24/7 staff. [Residents] would say that the policy is (only) in effect when we are here. I would say, on average, between both buildings we probably have 40 out of 100 smokers who comply with the policy,” one property manager explained.

The difficulty that some managers have in proving lease violations makes enforcement challenging, especially at properties with larger numbers of residents who smoke. As one might expect, properties with a lot of residents who had negative perceptions of the policy experienced increased difficulties in enforcement, compared to enforcement at properties with a smaller, more manageable number of smokers.

Some properties created strategies to address this enforcement barrier. “If we smell smoke we have permission to knock and let ourselves in,” a property manager said when asked to explain their enforcement policy. “We are a nonsmoking building so we will assume it is a fire.”

Other properties established a formal reporting process that encourages residents to report violations. However, the success of resident violation reports depends on resident dynamics and whether residents were willing to get another resident in trouble. In some cases, residents' ability to distinguish residual smoke from actual secondhand smoke limited the ability of managers to accept resident reports.

Managers at some properties utilized regular inspections of units to try to find evidence of violations. One property reported finding baseball hats covering smoke detectors and others saw ashtrays, carpet damage and other evidence of smoking in the unit that they were able to use as evidence for a lease violation. The greatest difficulty discussed in proving lease violations was balancing privacy and tenant rights with enforcement. A small number of residents went to great lengths to continue smoking in violation of the policy. Finding actual proof that those residents were smoking was a continual challenge that some managers faced.

Staff Support of Smoke-Free Policy

It is important to have a supportive and dedicated staff onsite in order to implement and enforce the smoke-free policy. Several managers advocated for smoke-free buildings and that facilitated implementation.

Enforcement is easier when staff members had good relationships with their residents. It became easier to enforce the policy and for residents to bring their issues to the staff. Property managers also said that having their staff "on board" with the enforcement policy is important.

"Without [staff] there to enforce it, there is no point in having the policy at all," one property manager said. "It's very important for residents to see our management and our staff enforcing the policy and that they are committed to enforcing the policy."

Phase-In Implementation and Grandfathering

Additional enforcement barriers include inconsistent policy enforcement, permanent grandfathering of current smoking residents, and the phasing-in of SFH policies over time. Grandfathering, or allowing a resident to continue smoking in their unit indefinitely after a policy is implemented, creates a long-term inconsistency in enforcement of smoke-free policy. Phasing-in the policy over time (which in some cases is required as changes to the lease can only be made when new leases are being signed) creates a similar, although generally much shorter-term inconsistency.

"Right now I don't know that people are 100 percent complying with it," one property manager explained. "Again our hands are somewhat tied until February of next year because you still have those who can smoke in their apartment versus those that can't. So I would say that that would be the biggest barrier right now." In this case, the phasing-in of the policy had created an

inconsistency. However, the manager believed the inconsistency would come to an end once the phasing-in was complete and all residents would be required to abide by the SFH policy.

A property manager who was implementing a policy that permitted grandfathering reported that a long-time smoking resident had made their unit a “smoking room.” In this particularly difficult case, the resident allowed other smokers to smoke in the room because it was technically allowed due to the grandfathering policy. Having several residents smoking in one room proved challenging for the property manager and neighboring residents. This added challenge caused several property managers to regret grandfathering of longtime residents who smoke under the revised smoking policies. Those who had grandfathered residents often stated that it had created more problems than it resolved.

Property managers who didn’t have the grandfathering policy, but instead provided a longer period of time between introducing and implementing new policies were able to be more consistent in their enforcement from the start. The extra time gave smokers the opportunity to move out or adjust to the policy. This strategy reduced enforcement barriers that would have existed with grandfathering or a phase-in approach.

Giving residents an opportunity to move out of a building that plans to implement SFH policy is not a reasonable solution for many properties in rural areas. Limited affordable housing options, particularly in rural parts of the state meant that smokers who strongly resisted a SFH policy did not have the option to move to a different property where smoking would be allowed. In those cases, long-time residents who smoke had to adapt to the new SFH policy.

Other Factors Facilitating Smoke-Free Policy

Social and Political Environment

Changes in the social and political environment affected implementation at some of the properties that developed policies. One of those political changes included the U.S. Housing and Urban Development’s (HUD) plans to make all HUD housing smoke free. Talk of this change motivated property managers and owners to implement smoke-free policies, as they knew they had HUD’s support. Some properties also discussed their desire to anticipate the SFH policy requirement that they knew they would likely have to implement in the future by implementing SFH policy before any HUD policy changes were officially made.

Property managers used HUD’s push for smoke-free public housing to convince owners and boards to move ahead with smoke-free policies. They also referred to it when explaining new policies to residents why they made the decision to go smoke free. In one case, a resident who was angered by the new smoke-free policy, threatened to contact HUD and report the property manager. The manager was able to tell the angry tenant that HUD fully supported and encouraged the new policy, which helped to somewhat diffuse the situation.

Many of the respondents also discussed the impact of the trend of smoke-free buildings locally and across the state. Local smoke-free policy changes provided additional motivation and support for public housing properties that considered new smoke-free policies. Some of these local policies contributed to one property manager's decision to include e-cigarettes. Other managers opted to wait until their city included e-cigarettes in their city-wide smoke-free policy before banning them from the property.

Resident Secondhand Smoke Complaints

Frequent resident complaints about secondhand and residual smoke also contributed to the implementation of smoke-free policies at some properties. These complaints motivated staff and boards and encouraged them to make the necessary changes by providing evidence that a smoke-free policy would be greeted with positivity and success. Some residents' complaints made it to the board. One resident told a board she had trouble breathing when her neighbors smoke. Another told a board she couldn't have her granddaughter visit because the granddaughter had asthma and she feared that the girl would have an attack due to smoke in the apartment. These personal stories and proof of residents' support played a major role in convincing decision-makers to implement smoke-free policies.

Smoke-Free Policy Success Stories

Just as these personal stories were effective in convincing boards to implement policies, success stories from other properties also helped convince properties that having a smoke-free policy was realistic. "As more and more properties become tobacco free, that helps (encourage) the ones that are reluctant," a LPH staff member said.

As properties succeed with these new policies, more management companies and counties across Minnesota are considering starting programs. Similarly, management companies that have success implementing SFH policy at one property are motivated to implement a smoke-free policy at more of their properties. With the help of TA agencies and LPH staff, properties that are reluctant to implement SFH policies hear stories from other properties where policy implementation was successful, which provides additional motivation and support for them to implement a policy at their own property. One property manager, when asked to identify one situation that helped convince them to go smoke free, mentioned a Hutchinson property's success.

Lessons Learned

Respondents were asked about what surprised them about the implementation and enforcement process. Many property managers voiced their surprise at how easy it was to implement smoke-free policies. "I was surprised by the fact that [residents] were so cooperative," one manager said. "I thought it was going to be a much harder process than it was."

Other managers voiced their surprise in witnessing a few of the more vocal residents actually try to cut back or quit smoking after policy implementation. Other residents who said they would leave if such a policy was implemented stayed and made the necessary lifestyle changes that allowed them to comply with the policy.

Still, as many property managers saw success that exceeded their expectations, others were discouraged by some residents who went to great lengths to violate their policies. Some of them estimated that less than half of their residents complied with the SFH policy. This showed particularly true at buildings with a high number of elderly and disabled residents because “there’s not a lot of incentive [to quit] when you’re 80” one manager stated.

Policy resistance depended on several factors, including resident dynamics and the number of smokers living in the building. Simply put, implementation of a smoke-free policy is more challenging at some properties than others. There is no perfect, all-encompassing formula for successful policy implementation.

Conclusions

The purpose of this project was to evaluate the process of implementing and enforcing SFH policies at public housing properties throughout Minnesota. With the help of SHIP funds, many of these properties were able to implement new policies. This evaluation is intended to provide a deeper understanding of the factors that are most helpful in overcoming implementation and enforcement barriers. This report seeks to provide valuable information that SHIP grantees can use to overcome barriers and create an approach to implementation and enforcement that best fits their property and their resident composition. While differences in properties will always exist, there are adaptations and adjustments that can be made when working to implement and enforce new SFH policies that may help grantees succeed.

Despite the differences in resident composition and resistance to SFH policy, LPH staff and property managers’ responses showed important factors that helped them overcome implementation and enforcement barriers. It was determined that educating staff and residents on the adverse health effects of second- and third-hand smoke and the economic benefits of going smoke free is an important step in encouraging smoke-free policy implementation. LPH and TA agencies also played an important role by providing education and the resources necessary to implement the policies. Many property managers also expressed a desire for greater emphasis on cessation support. Cessation can not only benefit individual residents who need support in quitting, but can also lead to more successful enforcement of SFH policy.

Finally, staff consistency and dedication is required to enforce strategies that will ensure that residents comply. Resident and staff dynamics and the number of smokers at a property will vary between properties. There is no perfect formula that will work for every property because of these variations. However there strategies that emerged from interviews illustrate how

property managers and owners are able to overcome some challenges. Overall, most property managers and owners who were interviewed saw positive results that surpassed their expectations in implementing and enforcing smoke-free policies.

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