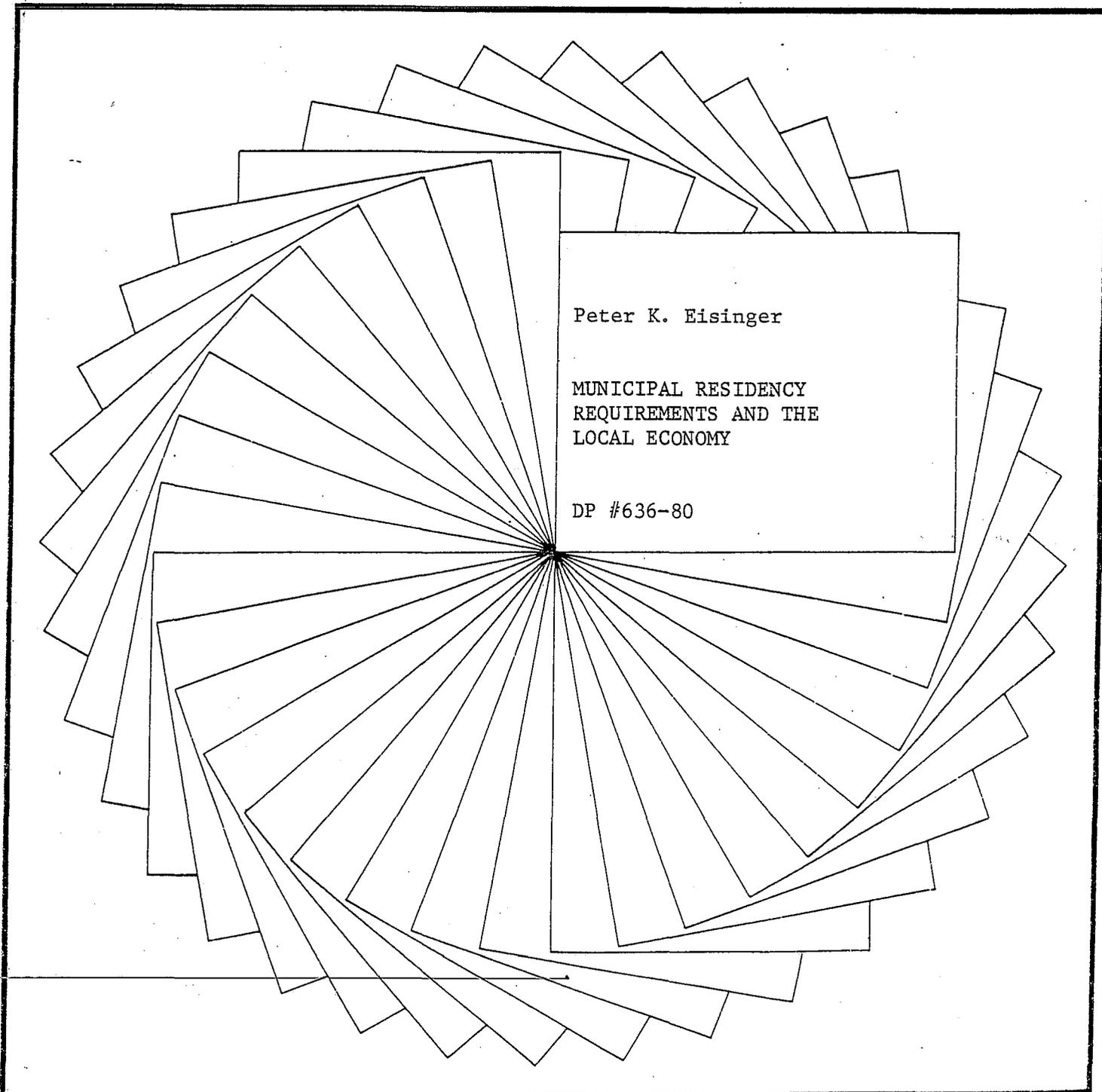




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MUNICIPAL RESIDENCY
REQUIREMENTS AND THE
LOCAL ECONOMY

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ABSTRACT

One of the little-noticed developments in American municipal administration in the 1970s was the explosive revival of an old machine-era device, the city residency law for public employees. In this paper, using information based on a survey of 85 cities, residency laws are explained not so much as a tool of public personnel management as an attempt to combat local unemployment and encourage the spending of city salaries in the local economy. The adoption of residency laws is in fact associated with unemployment, fiscal hardship, population loss, and black political influence. Local residency laws may be viewed as efforts by municipal governments to combat some of the causes of municipal fiscal distress.

Municipal Residency Requirements and the Local Economy

One of the little-remarked developments in American municipal administration during the 1970s was the explosive revival of an old machine-era device, the residency requirement for public employees.¹ In an age of increasing rationalization of personnel systems, students of public administration will find this a puzzling countertrend. I shall suggest, however, that the resurrection of residency laws may best be understood not as an aspect of personnel management, but rather as one of the various local government efforts to combat municipal fiscal distress. An examination of residency laws in this light not only helps to explain why modern administrators have been willing to revive a device associated with the spoils system but also the growing popularity of these laws in the face of almost universal and bitter opposition by the public employees they constrain.² In a period in which tensions between urban managers and their employees run high over issues such as cost of living adjustments and affirmative action, the injection of an issue such as the residency requirement, which establishes no management advantage over employees or their unions, is only explicable if we understand such laws as directed mainly to purposes which lie outside the domain of personnel administration.

1. RESIDENCY LAWS IN MUNICIPAL ADMINISTRATION

Residency requirements normally provide quite simply that local public employees must live within the boundaries of the city. Such requirements may be promulgated by city council ordinance, charter provision, or administrative rule. Residency laws are now relatively widespread: by 1980, nearly two-thirds

of all cities over 250,000 had such laws, most of them passed only in the preceding decade.

Although the exact origins of residency requirements are obscure, we know that they developed during the machine era in American cities before the turn of the century. There can be little doubt that they represented a variation on and a codification of contemporaneous patronage practices. As one early observer of municipal government notes, "The local residency requirement . . . is related to the central idea in the spoils system, namely that public employments are rewards for past service."³ Such laws were consistent with and may have grown out of the common practice in many machine cities of allowing aldermen to staff the police force by appointing residents of their respective wards. The first court challenge of a residency law that is on record was heard in Alabama in 1901.⁴

Opposition to residency laws emerged in the same period as a plank in the early reform movement, particularly among those interested in the spread of civil service.⁵ Arguing that such laws were a barrier to hiring the best candidates, reform groups attacked residency requirements in city after city. Beginning in the 1920s, public administration textbooks adopted the reform activists' view on such laws and elevated it to a position of professional orthodoxy. Residency requirements, wrote Mosher and Kingsley in their standard work, Public Personnel Administration, "are not in harmony with the merit principle. . . . It is a cardinal feature of selection according to merit that the best qualified candidate should be employed, whatever his residence."⁶ The International City Managers' Association likewise argued that residency laws were contrary to sound practices of personnel administration, classing them "among the greatest barriers to the establishment of a career service."⁷

Under the dual assault by reformers and the public administration profession, residency requirements were gradually eliminated from the municipal scene in the decades between 1920 and 1960 through charter revision, repeal, and public referendum. Some cities maintained their laws on the books in this period but allowed enforcement to lapse. Writing of residency laws as applied particularly to police hiring, Fogelson notes that "By the late 1960s only Philadelphia, Buffalo, Milwaukee, and a few other big cities retained the residency requirement."⁸

In light of the apparent acceptance of orthodox public administration doctrines, the revival of residency requirements in the 1970s is startling. For example, a survey of 104 randomly selected towns and cities conducted by the Akron Civil Service Commission found that of the two-thirds reporting that they now had a residency requirement, 81% had passed their law since 1970.⁹ No doubt some cities were encouraged to impose residency laws in the wake of the Supreme Court decision in 1976 which upheld the Philadelphia ordinance.¹⁰ But the movement back to residency laws was already well under way by the time of the McCarthy ruling.¹¹

Data gathered for the purposes of this present paper also document this revival. Residency requirement policies in 85 cities, including virtually all of those over 250,000 in population, were surveyed in winter 1979-80.¹² Forty-three of these cities (50.6%) had some sort of enforced city residency requirement, nearly all of them pertaining to all city employees. Of the 40 cities which could supply dates of passage for their residency laws, 60% had passed them in the 1970s.

Even this current status report masks slightly the true extent of the resurgence. For example, in several cities, including Chicago and Oklahoma City, chief executives ordered the enforcement of long-standing but dormant

residency requirements in the late 1970s. And a number of California cities, including Los Angeles, San Francisco, Oakland, and San Jose, passed such laws in the early 1970s, only to have to erase them from the statute books when California voters barred local residency requirements in a state constitutional initiative in 1974. In the survey, the California cities appear in the "no residency law" category even though they took part in the revival.

2. RESIDENCY REQUIREMENTS AND THE MUNICIPAL ECONOMY

The range of justifications for residency laws contained in the preambles of city ordinances, in city attorneys' briefs filed in court cases involving such laws, and in mayors' press releases is extensive. A Portland, Oregon, ordinance imposes a residency requirement in order to "reduce the energy used by City employees in their journey to work."¹³ A number of cities justify their law on the grounds that local residents are guaranteed 24-hour protection by public safety personnel, mainly the police, who must live within the city limits.¹⁴ Other justifications include the fostering of employee concern in the affairs of their city,¹⁵ the diminution of absenteeism and tardiness,¹⁶ and the desire to create greater social symmetry between public servants and their clientele.¹⁷

The intentions which lie behind these justifications are not mutually exclusive, nor do they run counter to what has emerged as the most persistent rationale for residency laws, namely their anticipated economic impacts. Residency laws are thought to bear on two major aspects of the local economy: employment and the circulation of money. The California Supreme Court in the Ector case recognized both aspects among a list of permissible state interests furthered by residency laws when it noted that a city could hope by such measures to reduce "high unemployment rates of inner-city minority groups" and to realize "the general economic benefits flowing from local expenditure of employees' salaries."

That the imposition of residency requirements may be linked empirically to local employment needs is suggested in the first instance by the fact that there was a brief revival of these laws during the Depression, an apparent effort by cities to reserve municipal jobs for their own residents.¹⁸ This short-lived upswing came, it will be recalled, in the midst of a more general long-term decline in the incidence of residency requirements. In the 1970s it has been the concentration of unemployed and underemployed minorities in central cities that has given fresh urgency to the employment rationale underlying residency requirements. For example, Thompson notes that in the city of Oakland personnel administrators, under pressure in the early 1970s to open more city employment to minorities, pushed successfully for the imposition of a residency law.¹⁹ And attorneys for the city of Philadelphia, arguing before the U.S. Supreme Court in McCarthy, sought to retain their city's ordinance in part on the grounds that it would help city-dwelling minorities to gain employment.²⁰ Residency laws are assumed to help central city minority job seekers by eliminating overwhelmingly white metropolitan workers from the competition for municipal civil service jobs.

The notion that salaries paid to civil servants ought to recirculate within the public and private economy of the city that pays those salaries -- known in legal doctrine as the "public coffer theory" -- originated not so much in the need to combat local fiscal distress but rather in some insular sense that municipal loyalty required what Hager has called a "mutual support obligation between a city and its employees."²¹ Today, as public employee salaries command between two-thirds and three-quarters of rapidly increasing municipal budgets and are often cited as a major reason for municipal fiscal distress,²² the public coffer theory has acquired a new currency. Thus, for example, the presumed benefits to New York City's economy of spending by

resident civil service employees emerged as a major argument in Mayor Abraham Beame's efforts to obtain a residency law for the city in the mid-1970s.²³

The notion that residency laws may be employed to enhance the local economy has evolved mainly in the courts. It has long been established, most recently in Sugarman v. Dougall,²⁴ that state and local governments may prescribe qualifications for public employment. As the Supreme Court noted in Sugarman, this power is inherent in the state by virtue of its obligation "to preserve the basic conception of a political community." As one legal commentator, D. Lamer, points out, preservation of the political community may mean preservation of the resources of the community.²⁵ Lamer continues: "Municipal employees who live in the city are not only subject to its taxes but also will presumably spend a good portion of their salaries in the area in which they live, thus ensuring that some, if not most, of the tax revenues expended by the municipality for employees' salaries will remain within the local economy."

The public coffer justification was originally enunciated judicially in the first case to consider the constitutional (rather than the technical) aspects of residency laws, Kennedy v. City of Newark.²⁶ In upholding Newark's law the New Jersey court declared that enhancing the public coffer was a "permissible state interest." It is notable that fifteen years later in Abraham v. Civil Service Commission²⁷ the same New Jersey court, re-examining Newark's residency law, specifically linked the city's public coffer motives to "today's crisis of the cities."

If indeed economic distress is one factor that prompts cities to pass or retain a residency requirement as an economic policy device, then we should find that the incidence of these laws is not distributed randomly among American cities. To test this proposition, the presence of an enforced municipal residency requirement was regressed on a variety of economic distress variables for all except the California cities in the 85-city sample (N = 74).

Results are shown in Table. 1.

Cities characterized by high unemployment, a declining tax base (indicated by a shrinking public sector workforce and population loss), and an aging physical plant (indicated by location in the Frostbelt, a region of older urban settlement -- see Table 2) are somewhat more likely than other cities to have and enforce residency laws. In all, the cluster of economic distress variables presented in Table 1 explains 23% of the variance in the incidence of residency laws.

In support of the proposition that cities with declining economies tend to pass or retain residency laws as an element of their municipal economic policy, it is instructive to examine a list of those cities which bucked the general trend by rescinding residency laws on their books in the 1970s. (See Table 3.) Nearly all of the cities on the list showed population growth or stability in the prior decade, and only one city, Miami Beach, exceeded the 8% average unemployment rate for all cities in the study sample. To the extent that these indicators are signs of relative local economic health, it would appear that cities in such favorable condition may feel less compelled to maintain residency laws.

The presence of an enforced city residency requirement is also related to the Nathan-Adams Central City Hardship Index.²⁸ This index, based on such 1970 census indicators as poverty level, per capita income, and education, measures the social and economic hardship of the central city in relation to its suburbs. The authors write that "Where the city-to-suburb hardship ratio is high . . . flight to the suburbs can be expected to accelerate and urban crisis conditions will deepen, (pp. 48-49). The Nathan-Adams sample contains the most populous city in 55 of the nation's largest 66 metropolitan areas. Eliminating the five California cities included in their analysis leaves a sample of 50 cities,

Table 1
 Regressions of City Employee Residency Requirement
 on Municipal Economic Distress Variables
 (N = 74)

Independent Variable	Simple r	Multiple R ^a	r ²
Decline of public sector workforce 1973-1978 ^b	.24	.24	.06
Population loss, 1960-1970 ^c	.19	.36	.13
Unemployment rate, 1977 ^d	.44	.47	.22
Frostbelt location ^e	.38	.48	.23

Note: The highest intercorrelation among the independent variables is .28 (Pearson r) between population loss and Frostbelt location. This is not high enough to indicate a problem of multicollinearity. See D. Farrar and R. Glauber, "Multicollinearity in Regression Analysis: The Problem Revisited," Review of Economics and Statistics, 49 (1967), 92-107.

^aStepwise, including all previous variables.

^bData from U.S. Bureau of the Census, City Employment in 1973; City Employment in 1978.

^cData from U.S. Bureau of the Census, 1970 Census.

^dData from U.S. Dept. of Labor, Bureau of Labor Statistics, Unemployment Rates for States and Local Governments, 1977.

^eIndicator of aging physical plant. See Table 2 for component states.

Table 2
Regional Incidence of
Residency Requirements, 1980
(N = 74)

Region	Residency requirement	No residency requirement
Frostbelt ^a	76% (32)	24% (10)
Sunbelt ^b	34% (11)	66% (21)

^aFrostbelt states include Maine, New Hampshire, Vermont, Rhode Island, Massachusetts, Connecticut, New York, New Jersey, Pennsylvania, Ohio, Michigan, Indiana, Illinois, Wisconsin, Minnesota, Iowa, North and South Dakota, Kansas, Missouri, Nebraska.

^bIncludes all other states. California cities are not included in the table.

Table 3

Population Change and Unemployment in Cities that
Rescinded Residency Requirements in the 1970s

City	Population change, 1960-1970	Unemployment rate, 1977
Jacksonville, Fla.*	+163.1%	5.6
Miami Beach, Fla.*	+ 37.9%	9.6
Columbus, Ga.	+ 32.0%	7.2
Omaha, Neb.*	+ 15.2%	3.7
Cranston, R.I.*	+ 9.4%	5.5
Brookline, Mass.	+ 9.0%	4.1
Baton Rouge, La.*	+ 8.9%	7.2
Tampa, Fla.*	+ 1.0%	6.7
Norfolk, Va.	+ 0.7%	6.3
Abilene, Tex.	- 1.1%	5.1
Seattle, Wash.	- 4.7%	6.5
Cleveland, Ohio	- 14.3%	7.2

Note: California cities are not included. Cities with asterisks were not included in the original sample for this study but are listed as having repealed their residency laws in Note, "Municipal Employee Residency Requirements and Equal Protection," Yale Law Journal, 84 (July, 1975), 1685.

16 of which are not included in my 74-city sample. City clerks in these 16 cities were telephoned to ascertain whether the city maintained an enforced residency requirement.

The incidence of residency laws was cross-tabulated with the 50 cities, divided into categories of high, medium, and low central city hardship. If residency laws represent an effort to stem population loss to the suburbs as a way of improving the city's economic condition, then we should find that such laws are more likely to exist in high-hardship cities than in low hardship ones. Table 4 bears out this relationship.

3. RESIDENCY LAWS AND BLACK INTERESTS

Arguments in favor of residency laws have not only stressed their potential contribution to the general municipal economy but also, more particularly, their anticipated economic impact on central city minority groups. Indeed, the implications of residency requirements seem especially important for urban blacks, who generally suffer an unemployment rate twice that of whites. In addition, the greater poverty level among blacks means that they are on the whole more dependent than whites on a healthy public treasury to finance critical services that upper income groups may purchase from the private sector.

To what extent, then, has the passage or retention of residency requirements been responsive to black needs? To what degree is the incidence of such laws a function of black political power?

Virtually every major city headed by a black mayor currently has a residency requirement, the majority of which were passed during the administrations of the black mayors (See Table 5.) The presence of a residency requirement is also associated statistically among the sample cities with several variables measuring black political power and black need, as shown

Table 4
Central City Hardship and the Incidence of Residency Laws, 1980
(N = 50)

Hardship Category	Residency Requirement	No Residency Requirement
High (N = 17)	88% (15)	12% (2) ^a
Medium (N = 16)	75% (12)	25% (4)
Low (N = 17)	41% (7)	59% (10)

Source: Adapted from Nathan and Adams, pp. 51-52.

^aOne of these cities is New York, which has a residency law on its statute book that it would like to enforce. A union challenge to the portion of the law pertaining to uniformed employees was upheld in the state's highest court in the spring of 1980, a decision which also threw into doubt the validity of the remainder of the law. Full enforcement of the law was pending at the time of this research.

in Table 6. The data suggest that one thing blacks do successfully when they gain positions of formal political power in cities, either as mayor or on the city council,²⁹ is press for the passage or retention of residency laws. Such efforts by black politicians appear to be responsive especially to black employment needs.

Residency laws are in fact more likely to be present in those cities where blacks stand to gain the most advantage from them, as the relatively strong correlation with the black advantage score shows. This score is an inverse measure of the degree to which the metropolitan labor force is barred from competing for municipal jobs. Or, to put the matter in another way, it is a measure of the bias in favor of central city blacks. Suppose central city black workers represent 10% of the metropolitan workforce but 30% of the central city workforce. The advantage score would equal 3.00, meaning that the theoretical chances of any individual black worker to obtain municipal employment are increased by a factor of three where a residency law exists. As the advantage score rises, so empirically does the likelihood that a city will have a residency law. In this context the residency requirement may be seen as a clear effort to affect the racial distribution of public sector jobs. Since public sector pay scales are higher than those for comparable jobs in the private sector, the residency requirement may also be regarded here as a tool for racial income redistribution.

Interestingly, residency laws are not related to the proportion black in the municipal public sector workforce in 1973. The affirmative action variables were included not to test the impact of residency laws but rather to determine whether these laws can be understood as a response to the problem of racial asymmetry between public servants and their clients. As the public workforce becomes more racially representative, we may argue that at least one

Table 5

Residency Requirements in
Major Cities with Black Mayors

	Atlanta	1976
	East St. Louis	1980
Passed During Black Mayor's Administration	Gary	1978
	Washington, D.C.	1980
	Newark	1975
	Birmingham	1968
Passed Prior to Black Mayor but Still Retained	Detroit	1968
	New Orleans	1973

Note: Los Angeles under Mayor Tom Bradley also passed a residency requirement in 1972 but was forced to rescind it, along with other California cities, in 1974.

Table 6

Presence of a Residency Requirement Related to
Black Power and Need (Pearson r)
(N = 74)

Percent black, 1970	.13
Number black, 1970	.20*
Black mayor, 1977	.23**
Black labor force concentration in central city ^a	.22
Black advantage score ^b	.40**
City council representation ratio, 1977 ^c	.18
Percent black in city public sector workforce, 1973 ^d	.02
Affirmative action effort ^e score, 1973	-.08

Note: Unless otherwise specified, data are calculated from the 1970 U.S. Census.

^aTotal black workers living in central city as a percentage of total black workers living in SMSA, 1970.

^bRatio of the percent black in the central city labor force to the percentage of that labor force in the SMSA labor force, i.e., $\frac{B}{C} \div \frac{B}{M}$ where

B = total central city black labor force

C = total central city labor force

M = total SMSA labor force

^cRatio of percent black on city council to percent black in city population.

^dSource: Individual city personnel departments' EEO-4 reports on affirmative action.

^eRatio of percent black in city public sector workforce to percent black in city population.

* p > .10

** p > .05

critical aspect of social asymmetry is reduced. As public servants come to resemble their clientele, the argument goes, they are presumably better able to understand their problems.³⁰ The courts have upheld residency laws on these grounds under the general rubric of what has come to be called the "stake in the community" doctrine.³¹ If asymmetry influenced the passage or retention of residency laws, we should find a negative relationship between affirmative action in the early part of the decade and the presence of such laws as remedies. Although the affirmative action effort score produces a coefficient in the predicted direction, it is so weak as to suggest no relationship.

The association between the presence of residency requirements and black political power and needs is not simply a function of the fact that blacks have tended to come to power in economically declining cities. The three strongest black influence predictor variables (black mayor, black labor force concentration, and black advantage score) were included with economic distress variables in a two-stage multiple regression (See Table 7). By including this black influence cluster we are able to explain an additional 14% of the variance in the incidence of residency laws. We may conclude from these data, then, that if residency requirements are policy responses in general to municipal economic distress, they are particularly responsive to that distress as it is felt by urban blacks.

4. CONCLUSIONS

The revival of residency laws in the 1970s, an era otherwise notable for the relative dominance of orthodox reform practices in public administration, has been explained not so much as a tool of public personnel management but as an attempt primarily by cities with declining economies to counter two of the causes of their distress: unemployment and the flight of tax payers and spenders from the city. As part of an effort to discourage out-migration,

Table 7

Regressions of Presence of City Employee Residency Requirement
on Economic Distress and Black Influence

(N = 74)

	<u>Multiple r</u>	<u>R²</u>
<u>Stage I.</u> Economic distress variables ^a	.48	.23
<u>Stage II.</u> Black influence variables ^b	.61	.37

^aFrom Table 1

^bPresence of black mayor, black labor force concentration, black advantage score, all from Table 6.

provide employment to central city residents, and keep municipal salaries circulating in the local economy, cities have in effect clothed an old device with new importance.³²

Now, it may be argued that residency laws are not only weak policy responses to the massive economic decay of American cities but also unproven devices in their economic effects. Furthermore, the roots of urban decline may lie largely beyond the control and resources of any municipality, while residency laws seem to assume a more or less bounded municipal economy. All of these points may be conceded readily enough, but in doing so we should not misunderstand the potential import of residency laws.

Take, for example, the case of New York City. In the mid-1970s, when the city was debating the reinstatement of a residency requirement, an estimated 10% or some 40,000 municipal civil servants lived outside the city. Let us assume conservatively that each employee was a member on the average of a two-person household. With the per capita local tax burden in New York running at \$700 per year,³³ these employees and their families, if they lived in the city, would theoretically have produced some \$56 million in tax revenues for the city. It is true that some minor portion of that money did in fact find its way into the city treasury by way of the commuter payroll and sales taxes. But a substantial portion of it was lost to the city, not only because of sales tax losses but also because nonresident workers pay a significantly lower payroll tax than residents.³⁴

Although the size of New York's public workforce and its unusually heavy local tax burden make this appear to be an extreme case, the implications of a residency law are for some cities even more weighty. Nationally, local payroll and sales taxes are not common;³⁵ most cities could not recover even that part of the lost revenues that New York has been able to. Furthermore,

the proportion of suburban-dwelling civil servants is often greater than in New York. For example, Atlanta officials estimated in the early 1970s that 85% of the white officers on the police force lived outside the city. In Seattle between 1972 and 1977, when the residence requirement was abolished, the requirement was waived for 135 (71%) of the 191 positions for which exams were given.³⁶

The point of these examples is to suggest that the tax revenues that may be collected from municipal employees, to say nothing of the salary money spent in the local private sector for goods and services, assume nontrivial proportions for cities that must husband every dollar.

We have also seen that the distillation of the labor pool achieved by eliminating metropolitan workers from the competition for public jobs theoretically enhances the prospects for central city minority job applicants. Given the recent passage of many residency laws (and the fact that some of them "grandfather" employees living outside the cities when the law was passed), it is too soon to seek to measure their effects in this regard. But in the long run, it is probable that such laws will increase minority employment in the public sector and stabilize in the city some small portion of the nonminority population dependent on city jobs.

FOOTNOTES

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3. W. Anderson, American City Government (New York: Henry Holt, 1925), p. 465.
4. Johnson v. State, 132 Ala. 43, 31 So. 493.
5. T. Devlin, Municipal Reform in the United States (New York: G.P. Putnam's Sons, 1896), p. 93.
6. Public Personnel Administration (New York: Harper, 1936), pp. 115-117; and T. Reed, Municipal Management (New York: McGraw-Hill, 1941), p. 260.
7. International City Manager's Association, Municipal Personnel Administration (Chicago: ICMA, 1950), p. 97; and The Technique of Municipal Administration (Chicago: ICMA, 1958), p. 189.
8. R. Fogelson, Big City Police (Cambridge, Mass.: Harvard University Press, 1977), p. 182.
9. City of Akron, Civil Service Commission, Summary of Residency Survey, unpublished document, November 14, 1979.
10. McCarthy v. Philadelphia Civil Service Commission, 424 U.S. 645 (1976).
11. International City Manager's Association, "Personnel Practices in the Municipal Police Service: 1976," Urban Data Service Report, 8 (December 1976), 2.

11. International City Manager's Association, "Personnel Practices in the Municipal Police Service: 1976," Urban Data Service Report, 8 (December, 1976), p. 2.
12. The sample on which this study is based was originally drawn for another purpose. All 49 cities over 250,000 (1970 population) were surveyed except for Washington, New York, and Honolulu. A supplementary random sample of cities between 250,000 and 50,000, numbering 82, was also drawn. Eighty-five of the total 131 cities responded to the survey, carried out through two mailings and two telephone follow-ups, making for a total response rate of 64.8%. The final sample includes 41 of the large cities and 44 of the smaller ones. These 85 cities were then surveyed by telephone for the purposes of the residency requirement study. Data were obtained for all of them.
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14. D. Smith, "Police Attitudes and Performance: The Impact of Residency," Urban Affairs Quarterly, 15 (March 1980), 320; see also Detroit Police Officers Association v. City of Detroit, 190 N. W. 2nd 104 (1971).
15. Cincinnati Ord., June 29, 1977.
16. Government Employee Relations Report, July 19, 1976, p. B-21.
17. Ector v. City of Torrance, 514 P 2nd 433 (1973).
18. N. Powell, Personnel Administration in Government (Englewood Cliffs, N.J.: Prentice-Hall, 1956), p. 239.
19. F. Thompson, "Bureaucratic Responsiveness in the Cities: The Problem of Minority Hiring," Urban Affairs Quarterly, 10 (Sept. 1974),
20. Government Employee Relations Report, "Residency Requirements," No. 650 (March 29, 1976), p. B-9.
21. Hager, "Residency Requirements," p. 208n; also Anderson, City Government, p. 465.
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23. New York Times, February 22, 1974.
24. 413 U.S. 634 (1973).
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Emory Law Journal, 24 (Spring 1975), p. 450.
26. 29 N.J. 178; 148 A 2nd 473 (1959).
27. 65 N.J. 61; 319 A 2nd 433 (1974).
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36. City of Seattle, Department of Personnel, office memorandum (May 20, 1977).