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Affirmatively Furthering Fair Housing using the AFH Tool and System

NCDA Region 1 Fall Conference
Portsmouth, NH

Bob Gehret, City of Boston

Marcy Esbjerg, City of Burlington

Overview of 2 Cities



City	Boston	Burlington
Population 2011-2015	650,281	42,570
% White alone, non-Hispanic	45.5%	84.0%
Housing Units 2011-2015	278,521	16,702
FY17 CDBG	\$15,761,309	\$719,669
FY17 HOME	\$4,152,803	\$400,595
FY17 HOPWA	\$2,285,329	\$0
FY17 ESG	\$2,014,377	\$0
Poverty % 2011-2015	21.5%	24.8.0%
Tenure with City	Bob - 31 years	Marcy – 5.5 years
Years in Community Development	Bob - 31 years	Marcy – 10 years



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Getting Started



What we will cover today:

Overview of program by section and specific issues encountered and how to resolve them.

- First steps:
 - Access to Secure Systems and to the Assessment of Fair Housing User Interface
 - Update Citizen Participation Plan
 - Decide about collaborations
- Plan ahead on creating two versions of the document:
 1. Online version of document in Secure Systems for HUD.
 2. Word version of document for public comment – more later



Getting Started - 2



- Combine table and map information from online version to Word version for easy reference
- Larger grantees may have issues downloading maps and saving as pdfs to share with public due to large amounts of data resulting in very large pdfs.
- Public version of Mapping and Data tool has multiple data versions – make sure you select correct version and download correct maps and tables to share with public.
- Raw data is also available to download to create your own maps or to do more in-depth analysis (by census tract, etc).



Cover Sheet - Certifications



- Online version in Secure Systems – “User Interface”
- If doing collaborative AFH with a PHA or one or more additional Con Plan participants, must specify a Lead participant in User Interface.
- List of Participants will be autopopulated as choices for Responsible Program Participants in the Goals section.
- Must upload a signed certification as well



Executive Summary



- Write this last – is supposed to be a summary
- Includes the following prompts:
 - Summarize fair housing issues, contributing factors, goals
 - Overview of process
 - Analysis used to reach goals



Assessment of Past Goals, Actions and Strategies



- Go back to your last Analysis of Impediments
- Discuss your progress (Burlington reviewed CAPERs)
- Discuss your success or challenges
- Discuss additional policies, actions steps you could take to achieve past goals
- Discuss how the experience helped shaped current goals



Fair Housing Analysis



Demographic Summary

General Issues (The 7 Fair Housing Issues):

- Segregation/Integration
- Racially or Ethnically Concentrated Areas of Poverty (R/ECAPS)
- Disparities in Access to Opportunity
- Disproportionate Housing Needs
- Publicly Supported Housing
- Disability and Access
- Fair Housing Enforcement, Outreach Capacity and Resources



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Demographic Summary



- HUD supplied tables
- Jurisdiction and Region
- Discuss patterns and trends over time (1990, 2000, 2010, “current”)
- Location of homeowners/renters – not supplied

Table 1 - Demographics

Race/Ethnicity	(Burlington, VT CDBG, HOME) Jurisdiction		(Burlington-South Burlington, VT) Region			
	#	%	#	%		
White, Non-Hispanic	37,027	87.29%	194,738	92.18%		
Black, Non-Hispanic	1,575	3.71%	3,395	1.61%		
Hispanic	1,144	2.70%	3,507	1.66%		
Asian or Pacific Islander, Non-Hispanic	1,518	3.58%	4,668	2.21%		
Native American, Non-Hispanic	111	0.26%	923	0.44%		
Two or More Races, Non-Hispanic	969	2.28%	3,843	1.82%		
Other, Non-Hispanic	73	0.17%	187	0.09%		
National Origin						
#1 country of origin	Vietnam	477	1.16%	Canada	2,534	1.26%
#2 country of origin	Bosnia & Herzegovina	439	1.07%	Vietnam	893	0.44%
#3 country of origin	Other South Central Asia	390	0.95%	Bosnia & Herzegovina	810	0.40%
#4 country of origin	Nepal	307	0.75%	China excl. Hong Kong & Taiwan	614	0.30%
#5 country of origin	Canada	265	0.65%	Other South Central Asia	520	0.26%
#6 country of origin	Other Eastern Africa	199	0.49%	Other Eastern Africa	484	0.24%
#7 country of origin	China excl. Hong Kong & Taiwan	169	0.41%	Germany	481	0.24%
#8 country of origin	India	161	0.39%	India	424	0.21%
#9 country of origin	Germany	153	0.37%	Nepal	352	0.17%
#10 country of origin	Other Middle Africa	115	0.28%	Other UK	308	0.15%
Limited English Proficiency (LEP) Language						
#1 LEP Language	Other Indic Language	495	1.21%	French	735	0.36%
#2 LEP Language	Vietnamese	388	0.95%	Vietnamese	672	0.33%
#3 LEP Language	Serbo-Croatian	237	0.58%	Other Indic Language	625	0.31%
#4 LEP Language	Other Asian Language	195	0.48%	Spanish	604	0.30%
#5 LEP Language	African	187	0.46%	Chinese	534	0.26%
#6 LEP Language	Spanish	94	0.23%	Serbo-Croatian	413	0.20%
#7 LEP Language	French	88	0.21%	African	344	0.17%
#8 LEP Language	Chinese	57	0.14%	Other Asian Language	258	0.13%
#9 LEP Language	Russian	45	0.11%	Arabic	144	0.07%
#10 LEP Language	Portuguese	37	0.09%	Other Indo-European Language	120	0.06%
Disability Type						
Hearing difficulty		1,251	3.09%		7,161	3.58%
Vision difficulty		670	1.66%		3,183	1.59%
Cognitive difficulty		2,414	5.97%		9,636	4.82%
Ambulatory difficulty		2,189	5.41%		10,599	5.30%
Self-care difficulty		674	1.67%		3,882	1.94%
Independent living difficulty		1,700	4.20%		7,794	3.90%
Sex						
Male		20,619	48.61%		103,475	48.98%
Female		21,798	51.39%		107,786	51.02%
Age						
Under 18		5,729	13.51%		44,537	21.08%
18-64		32,702	77.10%		142,252	67.33%
65+		3,986	9.40%		24,472	11.58%
Family Type						
Families with children		2,986	45.51%		23,440	45.47%

Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families.
 Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.
 Note 3: Data Sources: Decennial Census; ACS

[hange.info](#)

Tips/Tricks/Lessons Learned



Burlington

- Turn tables into graphs for public document
- Do basic level analysis
- Clearly define narrative for Jurisdiction vs. Region

Boston

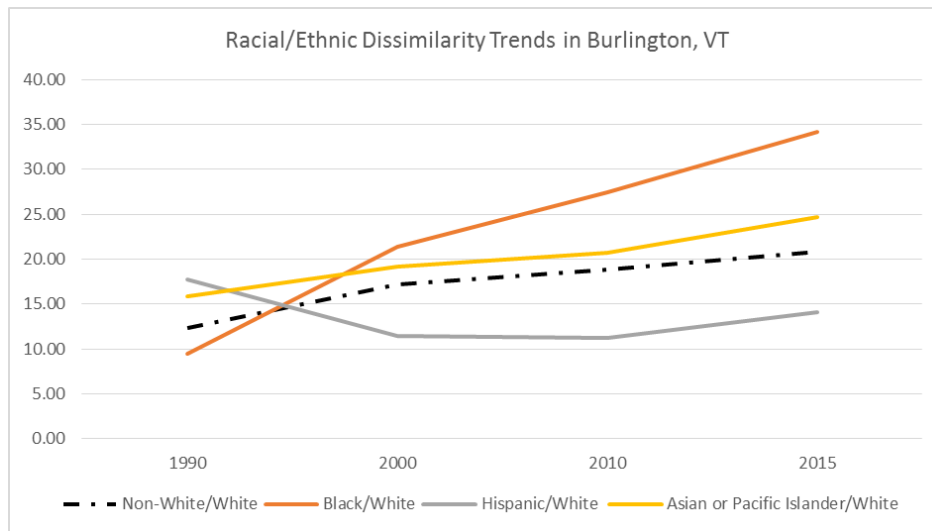
- Spot check the HUD data tables for obvious errors (Table 2)
- Check the HUD “AFFH-T Known Issues” fact sheets



Segregation



- HUD supplied table (dissimilarity index)
- HUD supplied maps
- Analysis prompts include:
 - Jurisdiction vs. Region
 - Trends over time
 - Areas by protected classes
 - Renter/owner housing
 - Patterns changed over time
 - Demographic trends, policies, practices leading to higher segregation



Racial/Ethnic Dissimilarity Trends Over Time in Burlington, VT. Source: Decennial Census for years 1990, 2000 and 2010; American Communities Survey (ACS) 2011-2015.





Segregation – Part 2

- Beyond HUD data, provide additional information
- Provide other relevant place-based investments and mobility options for protected classes
- Choose contributing factors from checklist – selections auto-populate another section of AFH.



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Tips/Tricks/Lessons Learned



Burlington

- Don't overdo the contributing factors
- Don't bother writing a narrative about contributing factors (just a check box)
- Ahead of time, list partners (contact them) for help with additional information

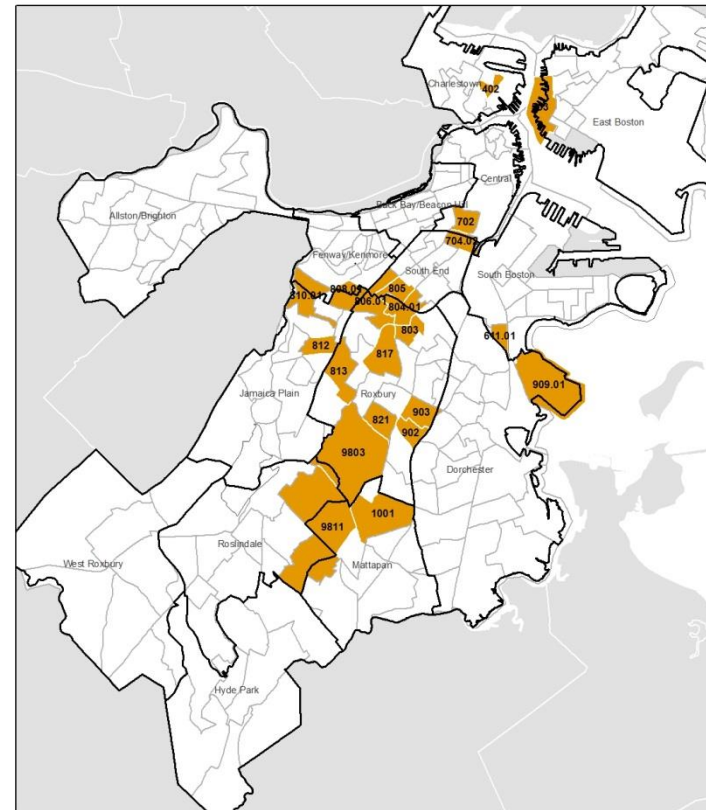
Boston

- Explain the interpretation of the dissimilarity index (the scoring) and other HUD indices for the general public

Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs)



- Analysis includes:
 - Identify R/ECAPS in jurisdiction
 - Compare protected classes residing in R/ECAPS in Jurisdiction to Region
 - Changes over time



Racially/Ethnically Concentrated Areas of Poverty (R/ECAP) 2013 by Census Tract

Legend:
non-R/ECAP (white)
R/ECAP (orange)
Planning District (black outline)

Source: al Census & 2013 5-Yr ACS Estimates)



R/ECAPs – Part 2



- Additional information
- Provide narrative on other relevant place-based investments and mobility options for protected classes
- Choose contributing factors



Tips/Tricks/Lessons Learned



Boston

- HUD R/ECAP demographic data is aggregate data totaled for all R/ECAPs together. Use ACS to get data for specific R/ECAPs
- HUD raw data had errors in identifying R/ECAPs – did not match tracts identified as R/ECAPs on HUD's maps.



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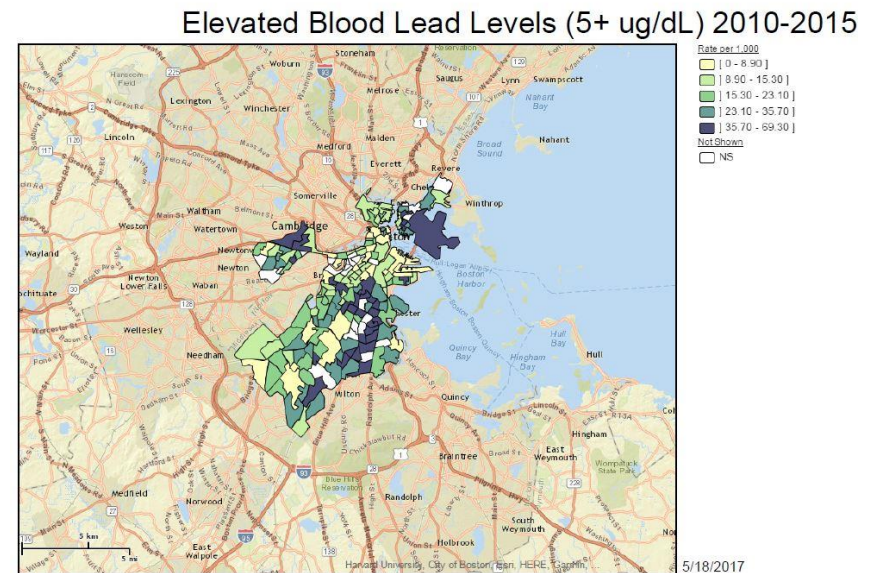
Disparities to Access to Opportunity

- HUD-supplied tables (indices) for:
 - Educational Opportunities
 - Employment Opportunities
 - Transportation Opportunities
 - Low Poverty Exposure Opportunities
 - Environmentally Healthy Neighborhood Opportunities

Disparities in Access to Opportunities

- Analysis includes:
 - Describe disparities based on table; most affected by race/ethnicity, national origin, family status group
 - How does residency play a part
 - Policies by Jurisdiction and Region impact protected classes

- Identify and discuss patterns
- Provide additional information
- Identify contributing factors



Tips/Tricks/Lessons Learned



Burlington

- Tables are difficult to understand
- Separate some key findings
- Identify partners to add information
- Research other policies or plans to add information

Boston

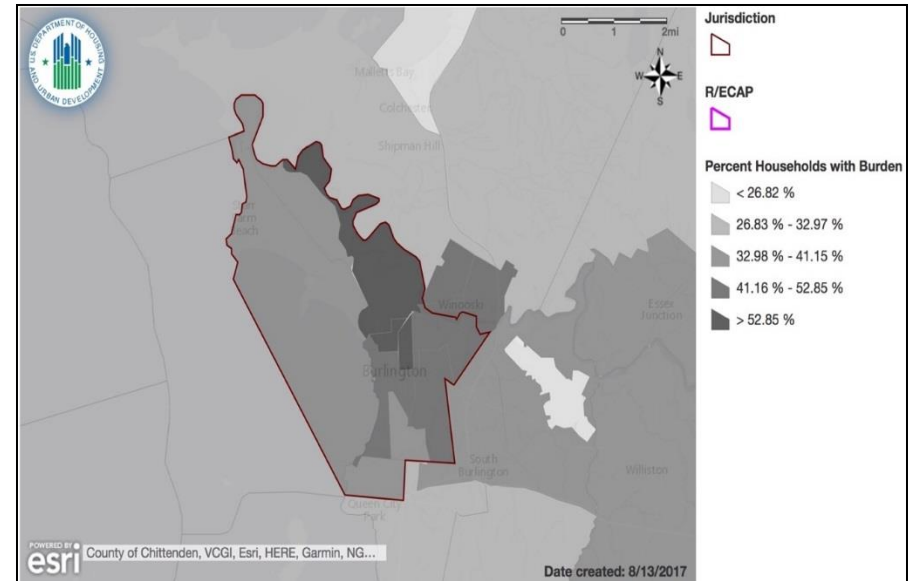
- Indices required explanation for public
- Environmental Health index was 2005 air quality data
- Schools quality index also problematic - presumed schools are neighborhood-based, based only on 4th grade reading/math scores.



Disproportionate Housing Needs



- Analysis includes:
 - 4 housing problems by race/ethnicity for jurisdiction and region
 - Severe housing cost burden by race/ethnicity and family type for jurisdiction and region
 - Choose contributing factors



Map showing percent of households experiencing housing burdens in Burlington, VT area.



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Publicly Supported Housing



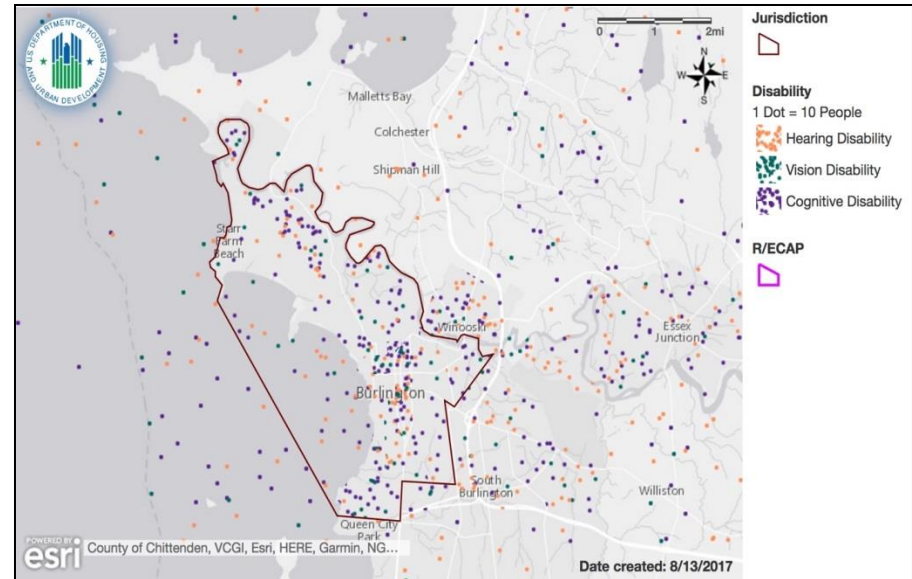
- Analysis includes:
 - Occupancy and location of Public Housing, Project-Based Section 8, Housing Choice Vouchers and Other Multifamily by race and ethnicity
 - Location in R/ECAPS
 - Choose contributing factors
- HUD data does not include state or locally-funded projects, LIHTC, HOME, etc.
- Because of the very large number of projects, Boston split the data into separate spreadsheets by housing category and sorted the data alphabetically by project name.



Disability and Access



- Analysis includes:
 - Type of disability for jurisdiction and region
 - Disability by age group for jurisdiction and region
 - Disability by publicly supported housing category
 - Choose contributing factors



Dot density map showing distribution of people with hearing, vision, and cognitive disabilities in the Burlington, VT area



Fair Housing Enforcement, Outreach Capacity and Resources



- Analysis includes:
 - Unresolved charge, finding, violation of fair housing law, lawsuit from DOJ, claim under the False Claims Act
 - Description of local and state fair housing laws
 - Organizations that provide fair housing information and outreach
 - Additional information
 - Choose contributing factors



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Fair Housing Goals and Priorities



Prioritization of Contributing Factors

- List of factors is autopopulated from chosen factors at the end of each of the 7 Fair Housing Issues
- Must give a priority level to each factor and justify the level given with a narrative explanation



Fair Housing Goals and Priorities



Create Goals To Address Priority Contributing Factors and Fair Housing Issues

- Should have at least one goal for each of the Fair Housing issues
- Must state the goal, which contributing factors and Fair Housing Issues the goal addresses
- Must establish the metrics, milestones and timeline for achieving the goal
- Identify which AFH entity is responsible for the goal
- Narrative discussion of how the goal addresses the contributing factor and Fair Housing Issue.



Tips/Tricks/Lessons Learned

- Don't wait till the end to work on these – engage external partners and municipal partners as soon as possible
- Takes a lot of time to add each of these goals into the online system
- Must be specific – most common reason plans are rejected

Community Participation Process



- Describe outreach – includes types of outreach, public hearings/meetings, media outlets, how you reached protected classes
- Provide a list of organizations consulted
- Summarize all comments



Tips/Tricks/Lessons Learned

Burlington

- Public process included gleaning information first, sharing the AFH afterwards
- Go to where the people are
- Survey, focus groups, resident meetings

Boston

- 2 draft process, HUD data only 1st draft, “local knowledge” & goals added in 2nd
- 13 public meetings or hearings
- BHA survey yielded 2000+ responses

HUD'S Review of the AFH

- 60 days to review and accept, reject, ask for changes
- See checklist in HUD Guidebook to ensure completeness
- No penalty for late submission but pushes back timeline for Con Plan/Action Plan/PHA plan.
- HUD will not approve Con Plan or Action Plan unless grantee has an approved AFH.



Wrap Up and Questions



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