Assessment of Fair Housing Tool

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I.   Cover Sheet

1.   ~~1.~~ Submission date:

2.   ~~2.~~ Submitter name:

3.   ~~3.~~ Type of submission (*e.g.*, single program participant, joint submission):

4.   ~~4.~~ Type of program participant(s) (*e.g.*, consolidated plan participant, PHA):

5.   ~~5.~~ For PHAs, Jurisdiction in which the program participant is located:

6.   ~~6.~~ Submitter members (if applicable):

7.   ~~7.~~ Sole or lead submitter contact information:

   a.   Name:

   b.   Title:

   c.   Department:

   d.   Street address:

   e.   City:

   f.   State:

   g.   Zip code:

8.   ~~8.~~ Period covered by this assessment:

9.   ~~9.~~ Initial, amended, or renewal AFH:

10.   ~~10. By this signature, I certify that~~ To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has ~~fulfilled~~developed this AFH in compliance with the requirements ~~at~~of 24 ~~CFR~~C.F.R. §§ 5.150-5.~~164~~180 or comparable replacement regulations of the Department of Housing and Urban Development ~~and that all information provided in this assessment is true, complete, and accurate to the best of my knowledge and belief as of the date~~;

11.   The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o), and 903.15(d), as applicable.

   All Joint and Regional Participants are bound by the certification, except that some of ~~this submission~~the analysis, goals or priorities included in the AFH may only apply to an individual program participant as expressly stated in the AFH.

   _____   (Signature) (date)

   _____(Signature) (date)

   (Signature) (date)

   ~~(Signature) (date)~~

~~10.~~12.   ~~11.~~ Departmental acceptance or non-acceptance: (Signature) (date)

Comments

~~OPTION B~~

II. ~~II.~~ **Executive Summary**

1. Summarize the fair housing issues, significant contributing factors, and goals. Also include an overview of the process and analysis used to reach the goals.

III. ~~III.~~ **Community Participation Process**

1. Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process~~.~~, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient~~,~~ (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board.

2. Provide a list of organizations consulted during the community participation process.

~~2.~~3. How successful were ~~those~~the efforts at eliciting meaningful community participation? If there was low participation, provide the reasons.

~~3.~~4. Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.

IV. ~~IV.~~ **Assessment of Past Goals ~~and,~~ Actions and Strategies**

1. Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments ~~and,~~ Assessments of Fair Housing, or other relevant planning documents:

   a. Discuss what progress has been made toward their achievement; ~~and~~

   b. Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences); and

   c. Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced.

   ~~b.~~d. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.

   ~~a. Discuss any additional policies, actions, or steps that address fair housing issues.~~

V. ~~V.~~ **Fair Housing Analysis**

A. **Demographic Summary**

   1. ~~1.~~ Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).

B. **Fair Housing Issue Analysis**

   2. 1. Describe the location of homeowners and renters in the jurisdiction and region, and describe trends over time.

B. **General Issues**

   i. **Segregation/Integration**

      1. 1. **Analysis**

a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.

b. Explain how these segregation levels have changed over time (since 1990).

c. Identify areas with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.

d. Consider and describe the location of owner and renter occupied housing in determining whether such housing is located in segregated or integrated areas.

d.e. Discuss how patterns of segregation have changed over time (since 1990).

e.f. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future.

      2. 2. **Additional Information**

a. Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.

b. The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and mobility options for protected class groups.

      3. 3. **Contributing Factors of Segregation**

Consider the listed contributing factors and any other contributing factors affecting the jurisdiction and region. Identify contributing factors that significantly impactcreate, contribute to, perpetuate, or increase the severity of segregation.

- Community Opposition
- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of regional cooperation

- Land use and zoning laws
- Lending Discrimination
- Location and type of affordable housing
- Occupancy codes and restrictions
- Private discrimination
- Other

ii. ~~2.~~ **R/ECAPs**

    1. ~~1.~~ **Analysis**

a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction.

b. Which protected classes disproportionately reside in R/ECAPs compared to the jurisdiction and region?

c. ~~Discuss~~Describe how R/ECAPs have changed over time (since 1990~~)?~~).

    2. ~~2.~~ **Additional Information**

a. Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics. ~~The program participant may also describe other information relevant to its assessment of R/ECAP.~~

b. ~~3.~~ The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and mobility options for protected class groups.

    3. **Contributing Factors of R/ECAPs**

Consider the listed ~~contributing~~ factors and any other ~~contributing~~ factors affecting the jurisdiction and region. Identify ~~contributing~~ factors that significantly ~~impact~~create, contribute to, perpetuate, or increase the severity of R/ECAPs.

- Community Opposition
- Deteriorated and abandoned properties
- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of regional cooperation
- Land use and zoning laws
- Location and type of affordable housing
- Occupancy codes and restrictions

- Private discrimination
- Other

iii. ~~3.~~ **Disparities in Access to Opportunity**

1. ~~1.~~ Analysis

a. ~~Which racial/ethnic, national origin, or family status groups are least able to attend~~ **Educational Opportunities**

   i. Describe any disparities in access to proficient schools~~? How does a family's place of residence affect a student's ability to attend a proficient school?~~ based on race/ethnicity, national origin, and family status.

   ii. Describe the relationship between the residency patterns of racial/ethnic, national origin, and family status groups and their proximity to proficient schools.

   ~~i.~~iii. Describe how school-related policies, such as school enrollment policies, affect a student's ability to attend a proficient school. Which protected class groups are least successful in accessing proficient schools?

b. **Employment Opportunities**

   i. Describe any disparities in access to jobs and labor markets ~~based on~~by protected class groups.

   ii. How does a person's place of residence~~.~~ affect their ability to obtain a job?

   ~~i.~~iii. Which racial/ethnic, national origin, or family status groups are least ~~able to access~~successful in accessing employment ~~opportunities~~?

c. **Transportation Opportunities**

   i. Describe any disparities in access to transportation based on place of residence~~.~~, cost, or other transportation related factors.

   ~~i.~~ii. Which racial/ethnic, national origin or family status groups are most affected by ~~any~~the lack of ~~transportation as~~ a reliable ~~bridge to~~, affordable transportation connection between their place of residence and opportunities?

   iii. Describe how the jurisdiction's and region's policies, such as public transportation routes or transportation systems designed for use personal vehicles, affect the ability of protected class groups to access transportation.

d. **Low Poverty Exposure Opportunities**

   i. Describe any disparities in ~~the~~exposure to poverty ~~index based on~~by protected class groups.

ii.   What role does a person's place of residence.— play in their exposure to poverty?

i.iii.   Which racial/ethnic, national origin or family status groups face are most affected by these poverty indicators?

iv.   Describe how the jurisdiction's and region's policies affect the ability of protected class groups to access low poverty areas.

e.   Environmentally Healthy Neighborhood Opportunities

i.   Describe any disparities in access to environmentally healthy neighborhoods based on place of residence. by protected class groups.

ii.   Which racial/ethnic, national origin or family status groups arehave the least able to access to environmentally healthy neighborhoods?

f.   Patterns in Disparities in Access to Opportunity

i.   Identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors based on race/ethnicity, national origin or familial status. Identify areas that experience an aggregate of poor access to opportunity and high exposure to adverse factors. Include how these patterns compare to patterns of segregation and R/ECAPs.

2.   2. Additional Information

a.   Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.

b.   The program participant may also describe other information relevant to its assessment of disparities in access to opportunity., including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).

3.   3. Contributing Factors of Disparities in Access to Opportunity

Consider the listed contributing factors and any other contributing factors affecting the jurisdiction and region. Identify contributing factors that significantly impactcreate, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

- Access to financial services
- The availability, type, frequency, and reliability of public transportation
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of regional cooperation
- Land use and zoning laws
- Lending Discrimination
- Location of employers

- Location of environmental health hazards
- Location of proficient schools and school assignment policies
- Location and type of affordable housing
- Occupancy codes and restrictions
- Private discrimination
- Other

iv. ~~4.~~ **Disproportionate Housing Needs**

1. ~~1.~~ **Analysis**

a. Which groups (by race/ethnicity and family status) ~~are more likely than other groups to~~ experience higher rates of housing cost burden, overcrowding, or substandard housing~~?~~ when compared to other groups? Which groups also ~~disproportionately~~ experience higher rates of severe housing burdens when compared to other groups?

b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?

c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing.

d. ~~2.~~ Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.

2. **Additional Information**

a. Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.

b. The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA's overriding housing needs analysis.

3. ~~3.~~ **Contributing Factors of Disproportionate Housing Needs**

Consider the listed ~~contributing~~ factors and any other ~~contributing~~ factors affecting the jurisdiction and region. Identify ~~contributing~~ factors that significantly ~~impact~~create, contribute to, perpetuate, or increase the severity of disproportionate housing needs.

- The availability of affordable units in a range of sizes
- Displacement of residents due to economic pressures
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Land use and zoning laws

- Lending Discrimination
- Other

C. Publicly Supported Housing ~~Patterns~~Analysis

1. ~~1.~~ Analysis

a. Publicly Supported Housing Demographics

i. Are certain racial/ethnic groups more likely to be residing in one category of publicly supported housing than other categories (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and ~~HCV)?~~ Housing Choice Voucher (HCV))?

ii. Compare the demographics, in terms of protected class, of residents of each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant category of publicly supported housing. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

b. Publicly Supported Housing Location and Occupancy

i. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs.

ii. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs?

iii. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs?

iv. (A) Do any developments of public housing, properties converted under the ~~Rental Assistance Demonstration~~RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category? Describe how these developments differ.

(B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing.

v. Compare the demographics of occupants of developments, for each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. Describe whether developments that are primarily occupied by one race/ethnicity are located in areas

occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

c. Disparities in Access to Opportunity

i. Describe any disparities in access to opportunity for residents of publicly supported housing, including within different program categories (public housing, project-based Section 8, Other HUD Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.

2. ~~2.~~ Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.

b. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or mobility programs.

3. ~~3.~~ Contributing Factors ~~of~~ Publicly Supported Housing Location and Occupancy

Consider the listed ~~contributing~~ factors and any other ~~contributing~~ factors affecting the jurisdiction and region. Identify ~~contributing~~ factors that significantly ~~impact~~create, contribute to, perpetuate, or increase the ~~siting and occupancy~~severity of fair housing issues related to publicly supported housing ~~and the fair housing issues, which are~~, including Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

- Admissions and occupancy policies and procedures, including preferences in publicly supported housing ~~Land use and zoning laws~~
- Land use and zoning laws
- Community opposition
- Impediments to mobility
- Lack of private investment in specific neighborhoods
- Lack of public investment in specific neighborhoods, including services and amenities
- Lack of regional cooperation
- Occupancy codes and restrictions
- Quality of affordable housing information programs
- Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
- Source of income discrimination
- Other

D. **Disability and Access Analysis**

1. **Population Profile**

    a. How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?

    b. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges.

2. **Housing Accessibility**

    a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.

    b. Describe the areas where affordable accessible housing units are located. Do they align with R/ECAPs or other areas that are segregated?

    c. To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing?

3. **Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings**

    a. To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

    b. Describe the range of options for persons with disabilities to access affordable housing and supportive services.

4. **Disparities in Access to Opportunity**

    a. To what extent are persons with disabilities able to access the following? Identify major barriers faced concerning:

        i.   Government services and facilities

        ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

        iii. Transportation

        iv. Proficient schools and educational programs

        v.   Jobs

    b. Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.

c.   Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities.

5.   Disproportionate Housing Needs

a.   Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities.

5.6. Additional Information

a.   Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region affecting groups with other protected characteristics.

b.   The program participant may also describe other information relevant to its assessment of disability and access issues.

6.7. Disability and Access Issues Contributing Factors

Consider the listed ~~contributing~~ factors and any other ~~contributing~~ factors affecting the jurisdiction and region. Identify ~~contributing~~ factors that significantly ~~impact~~create, contribute to, perpetuate, or increase the severity of disability and access issues ~~housing~~ and the fair housing issues, which are Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each ~~significant~~ contributing factor, note which fair housing issue(s) the selected contributing factor ~~impacts~~relates to.

- Access to proficient schools for persons with disabilities
- Access to publicly supported housing for persons with disabilities
- Access to transportation for persons with disabilities
- Inaccessible government facilities or services
- Inaccessible sidewalks, pedestrian crossings, or other infrastructure
- ~~Lack of access to government facilities or services~~
- ~~Lack of access to proficient schools~~
- ~~Lack of access to publicly supported housing~~
- ~~Lack of access to transportation due to lack of accessibility, lack of reliability, lack of services, or cost~~
- Lack of affordable in-home or community-based supportive services
- Lack of affordable, accessible housing in range of unit sizes
- Lack of affordable, integrated housing for individuals who need supportive services
- Lack of assistance for housing accessibility modifications
- Lack of assistance for transitioning from institutional settings to integrated housing
- Land use and zoning laws
- Lending Discrimination
- Location of accessible housing
- Occupancy codes and restrictions
- Regulatory barriers to providing housing and supportive services for persons with disabilities

- State or local laws, policies, or practices that discourage individuals with disabilities from being placed in or living in apartments, family homes, and other integrated settings
- Other

E.   **Fair Housing Enforcement, Outreach Capacity, and Resources Analysis**

1. List and summarize any of the following that have not been resolved: a charge or letter of finding from HUD concerning a violation of a civil rights-related law, a cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law, a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law, or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.

2. Describe ~~the extent to which the jurisdiction~~ any state or ~~region has provided resources to~~local fair housing laws. What characteristics are protected under each law?

3. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

4. **Additional Information**

   a. Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.

   ~~a.~~b. The program participant may ~~assist in~~also include information relevant to programs, actions, or activities to promote fair housing ~~analysis~~outcomes and ~~investigation~~capacity.

~~2.~~5. **Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors**

Consider the listed ~~contributing~~ factors and any other ~~contributing~~ factors affecting the jurisdiction and region. Identify ~~contributing~~ factors that significantly ~~impact~~create, contribute to, perpetuate, or increase the severity of fair housing enforcement, outreach capacity, and resources and the fair housing issues, which are Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

- Lack of local private fair housing outreach and enforcement
- Lack of local public fair housing enforcement
- Lack of resources for fair housing agencies and organizations
- Lack of state or local fair housing laws
- Unresolved violations of fair housing or civil rights law
- Other

~~OPTION B~~

VI. ~~V.~~ **Fair Housing Goals and Priorities**

1. For each fair housing issue, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance. ~~Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2.~~

2. For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Discussion:				

Assessment of Fair Housing (AFH) Instructions

Introduction

Program participants conducting an assessment of fair housing as required under the affirmatively furthering fair housing rule, published at 80 FR 42272, are required to complete and submit an Assessment Tool. For regulatory requirements of the AFFH rule and the AFH, see 24 C.F.R. §§ 5.150-5.180.

This Assessment Tool, including these instructions, will be used by local governments that receive Community Development Block Grants (CDBG), HOME Investment Partnerships Program (HOME), Emergency Solutions Grants (ESG), or Housing for Persons with AIDS (HOPWA) formula funding from HUD when conducting and submitting their own Assessment of Fair Housing (AFH). The Assessment Tool will also be used for AFHs conducted by joint and regional collaborations between: (1) local governments; (2) one or more local governments with one or more public housing agency (PHA) partners; and (3) other collaborations in which a local government (described above) is designated as the lead entity for the collaboration. A joint or regional AFH does not relieve such collaborating program participant from its obligation to analyze and address local and regional fair housing issues and contributing factors that affect fair housing choice, and set priorities and goals for its geographic area. Program participants that conduct and submit either a joint or regional AFH must provide HUD with a copy of their written agreement prior to submitting the AFH. Please see the following chart identifying which program participants will use this Assessment Tool, and the program participants that will use a different Assessment Tool.

Who must use this Assessment Tool	Who will use a different Assessment Tool
1. Local governments (that receive CDBG, HOME, ESG or HOPWA funds) submitting an AFH alone.	1. States and Insular Areas submitting alone
2. Joint or Regional Collaborations between:	2. Joint or regional collaborations (with local governments and/or PHAs) where the State is designated as the lead entity
a. Only local governments	3. PHAs submitting alone
b. One or more local governments with one or more PHAs	4. Joint collaborations among only PHAs
c. Other collaborations in which a local government is designated as the lead entity	

All program participants must use the HUD-provided data, which includes data for the jurisdiction and region, to complete the AFH. A joint or regional AFH must reference the HUD-provided data for each program participant's jurisdiction and region. The Assessment Tool and HUD-provided data will be used by various types of program participants (e.g. those in urban areas, rural areas, suburban areas, majority-minority communities), which may have unique characteristics, issues and challenges. The HUD-provided data will help program participants assess local and regional

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fair housing issues and contributing factors and set priorities and goals to overcome them. However, certain HUD-provided data may have limitations, including limitations in how they apply to geographic areas with different characteristics (e.g., rural versus urban, majority minority areas). For this reason, program participants must supplement the HUD-provided data with local data and local knowledge outlined in 24 C.F.R. § 5.152 and discussed below.

HUD is only able to provide data for those protected class groups for which nationally uniform data are available. For this reason, some questions focus on specific protected classes based on the availability of such data. For those questions, local data and local knowledge may provide information to supplement the analysis for protected classes not covered by the HUD-provided data. Local data and local knowledge can be particularly helpful when program participants have local data that are more up-to-date or more accurate than the HUD-provided data or when the HUD-provided data do not cover all of the protected classes that would be relevant to program participants' analyses.

Although HUD will provide nationally available data to program participants, the regulations recognize the value of local data and knowledge. Local data is defined in the Final Rule at 24 C.F.R. § 5.152, and refers to metrics, statistics, and other quantified information, subject to a determination of statistical validity by HUD, that are relevant to program participants' geographic areas of analyses, can be found through a reasonable amount of searching, are readily available at little or no cost, and are necessary for the completion of the AFH using the Assessment Tool. Examples of local data include relevant demographic data or program-related data maintained by program participants, another public agency, or another entity that are readily available and easily accessible to program participants at little or no cost.

Local knowledge is defined in the Final Rule at 24 C.F.R. § 5.152, and means information to be provided by program participants that relates to program participants' geographic areas of analyses and that is relevant to program participants' AFH, is known or becomes known to program participants, and is necessary for the completion of the AFH using the Assessment Tool. Examples of local knowledge include laws and policies, common neighborhood names and borders, and information about the housing market and housing stock. HUD does not expect program participants to review every possible source to search out local knowledge. However, local knowledge includes information obtained through the community participation process. Program participants are required to consider the information received during the community participation process as they conduct an AFH using the Assessment Tool.

Program participants are required to comply with the Privacy Act of 1974 (5 U.S.C. § 552a), and applicable State laws in the collection, maintenance, use and dissemination of personally identifiable information.

Program participants must use reasonable judgment in deciding what supplemental information from among the numerous sources available would be most relevant to their analysis. HUD does not expect program participants to hire statisticians or other consultants to locate and analyze all possible sources of local data. Note that, subject to the community participation, consultation and coordination process outlined in the Final Rule at 24 C.F.R. § 5.158, program participants are required to consider information relevant to the jurisdiction or region submitted during the community participation process, including recommendations of other data sources for program participants to assess.

In conducting the analysis, program participant must identify significant contributing factors reach section of the analysis. When identifying contributing factors, each section of the analysis contains

a discrete list of suggested factors for consideration, which includes factors commonly associated with that section of the analysis. The list contains an "other" option, for program participants to use in identifying other significant contributing factors not included in the list. A more exhaustive list of possible contributing factors is contained in Appendix C, which also includes a description of each contributing factor. Program participants are permitted to include contributing factors that are not listed in Appendix C.

A contributing factor may be outside the ability of program participants to directly control or influence; however, such factors must be identified if they are significant. For program participants submitting jointly, each program participant is responsible for identifying contributing factors within its jurisdiction. These factors will be prioritized in Section VI and used as a basis for establishing goals.

The Assessment Tool also contains the required analysis of fair housing issues and contributing factors that program participants must undertake in order for an AFH to meet the requirements set forth in 24 C.F.R. §§ 5.150 through 5.180. The content required in the AFH can be found at 24 C.F.R. § 5.154 and is outlined in the applicable Assessment Tool for each program participant. However, please note that different program participants may work through the Assessment of Fair Housing in different ways. Depending on each program participants' familiarity with fair housing planning and planning style, each program participant may choose to complete the required components of an Assessment of Fair Housing in a variety of ways. For example, while the AFFH rule requires that program participants identify significant contributing factors, prioritize such factors, and justify the prioritization of the contributing factors that will be addressed in the program participant's fair housing goals, it does not specify a specific process for meeting these requirements. Program participants may choose to complete the AFH in any order they choose, so long as all requirements are met.

Part I: Cover Sheet with Certification

Complete the cover sheet with all requested information. The official authorized representative of each program participant must sign and date the certification.

Part II: Executive Summary

To complete the Executive Summary, refer to fair housing contributing factors, issues and goals identified in parts IV and V of the Assessment Tool, as well as goals identified in the most recent previous Analyses of Impediments to Fair Housing Choice or Assessments of Fair Housing. There is no prescribed format for the Executive Summary—program participant(s) have discretion in this section as to how to summarize their findings in the AFH.

Part III: Community Participation Process

Complete all three questions based on the community participation, consultation and coordination process outlined in the Final Rule at 24 C.F.R. § 5.158. Program participants should employ communications means designed to reach the broadest possible audience. Such communications may be met as appropriate, by publishing a summary of each document in one or more newspapers of general circulation, and by making copies of each document available on the Internet, on program participants' official government Web sites, and as well at libraries, government offices, and public places.

Please note that for public housing agencies, community participation requirements are described in 24 C.F.R. §§ 903.13, 903.15, 903.17, and 903.19. For consolidated plan program participants, Citizen Participation requirements are described in 24 C.F.R. part 91. As required by applicable regulations, program participants must ensure meeting are held in physically accessible locations, provide appropriate auxiliary aids and services necessary to ensure effective communication with individuals with disabilities, and provide limited English proficient persons meaningful access to programs and services.

For question (1), provide a summary of the outreach activities undertaken. For PHAs, also include any meetings with the Resident Advisory Board.

For question (2), provide a list of any organizations consulted during the community participation process. For consolidated plan program participants, 24 C.F.R. § 5.158(a)(1), states that consolidated plan program participants must follow the policies and procedures described in 24 C.F.R. part 91 (see 24 C.F.R. §§ 91.100, 91.105, 91.110, 91.115, 91.235, and 91.401). For PHAs, 24 C.F.R. § 5.158(a)(2) states that PHAs must follow policies and procedures described in 24 C.F.R. part 903.

For question (3), describe how successful the community participation process was, and provide an explanation for any low participation rates.

In question (4), pursuant to 24 C.F.R. § 5.154(d)(6), program participants must include an explanation for why any comments or views submitted through the community participation process were not accepted – note that this includes information, such as supplemental data and reports.

Part IV: Assessment of Past Goals, Actions, and Strategies

For question (1)(a), provide an explanation of what past goals program participants selected and what progress has been made toward their achievement. Use the metrics and milestones identified in past Analyses of Impediments or past Assessments of Fair Housing in assessing progress. New program participants may still answer this question based on any other relevant planning documents and/or any past fair housing goals, actions, or strategies.

To answer question (1)(b), explain how the past goals selected influenced the selection of current goals.

For question (1)(c), program participants may provide any additional information about policies, actions, or steps that address fair housing issues in program participants' geographic areas of analyses.

Part V: Fair Housing Analysis

For all questions, program participants must use the HUD-provided data and supplement that information with local data and local knowledge when it meets the criteria under 24 C.F.R. § 5.152 (described above). HUD-provided maps are located in Appendix A and HUD-provided tables are located in Appendix B.

Where HUD has not provided data for a specific question in the Assessment Tool and program participants do not have local data or local knowledge that would assist in answering the question, program participants are expected to note this rather than leaving the question blank.

OPTION B

A. Demographic Summary

For question (1), refer to Tables 1 and 2, which present demographic summary data for the jurisdiction and region. The demographics analyzed must include an overview of: racial/ethnic populations; national origin populations, including any limited English proficient populations; individuals with disabilities by disability type; and families with children.

For question (2), local data and local knowledge may be particularly useful in answering this question. Include any geographic patterns in the location of owner-occupied properties compared to renter-occupied properties over time. Program participants may also describe trends in the availability of affordable housing in the jurisdiction and region for that time period.

B. Fair Housing Issue Analysis

Segregation/Integration

For questions (1)(a) and (1)(b), refer to Table 3. Table 3 presents the dissimilarity index for the jurisdiction and region for white/non-white, black/white, Hispanic/white, and Asian/white populations for multiple census years.

This dissimilarity index measures the degree to which two groups are evenly distributed across a geographic area and is commonly used for assessing residential segregation between two groups. Values range from 0 to 100, where higher numbers indicate a higher degree of segregation among the two groups measured.

Dissimilarity index values between 0 and 39 generally indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation. However, context is important in interpreting the dissimilarity index. The index does not indicate spatial patterns of segregation, just the relative degree of segregation; and, for populations that are small in absolute numbers, the dissimilarity index may be high even if the group's members are evenly distributed throughout the area. Generally, when a group's population is less than 1,000, program participants should exercise caution in interpreting associated dissimilarity indices. Also, because the index measures only two groups at a time, it is less reliable as a measure of segregation in areas with multiple demographic groups. For question 1(a) indicate whether the measures shown generally indicate that segregation in the jurisdiction and region is low, moderate or high for each racial/ethnic group represented in Table 3, and note which groups experience the highest levels of segregation.

For question 1(b), refer to Table 3, which also provides dissimilarity index values for 1990, 2000, and 2010. Note whether the dissimilarity index values have increased or decreased over time. Increasing values may indicate increasing segregation, and decreasing values may indicate decreasing segregation.

For question (1)(c), refer to Maps 1, 2, 3. Maps 1, 2, 3 are dot density maps showing the residential distribution of racial/ethnic, national origin, and limited English proficient (LEP) populations in the jurisdiction and region. A dot density map (also known as dot distribution map) uses a color-coded dot symbols representing the presence of a specified number of individuals sharing a particular characteristic to show a spatial pattern. The presence of residential segregation may appear as clusters of a single color of dots representing one protected class, or as clusters of more than one color of dots representing a number of protected classes but still excluding one or more protected classes. More integrated areas will appear as a variety of colored dots.

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While dot density maps are useful in demonstrating residential patterns, they also have limitations. Dot placement does not represent actual addresses – rather individual dots are randomly located within a particular census block to match aggregate population totals for that block group. Note also that the data provided for national origin is based on census data for the 5 most populous "foreign born" populations by country of origin, however, some jurisdictions may have other significant populations not included in the HUD-provided data but reflected in local data or local knowledge. In addition, the "foreign born" population does not track exactly with the definition of national origin under the Fair Housing Act, which includes place of birth as well as place of ancestor's birth. LEP data shows residential segregation by language for speakers of the five most populous limited English proficient groups in the jurisdiction and region. Again, some jurisdictions may have other significant populations not included in the HUD-provided data but reflected in local data or local knowledge.

For question (1)(c), refer to Maps 1, 2, 3 to identify areas on the map that reveal clusters of race/ethnicity, national origin, or LEP groups, and areas where the map indicates are particularly integrated. In identifying those areas, and all areas throughout the tool, use commonly used neighborhood or area names.

For question (1)(d),local data and local knowledge may be particularly useful in answering this question.

For question (1)(e) refer to Maps 1, 2, 3, and Tables 1 and 2. Map 2 depicts racial/ethnic dot density distribution for previous years (1990 and 2000). A comparison of the patterns shown in Map 2 to the patterns shown in Map 1 may reveal changes in patterns of segregation by race/ethnicity over time. For instance, the comparison may show that an area previously occupied predominantly by one racial/ethnic group is now more integrated. Consider these changes in conjunction with Tables 1 and 2 showing changes in overall demographics over time, as well as local knowledge about local policies, practices, trends, and investments to answer question 1(e). Consider also Maps 3 and 4, which depict dot density distribution of national origin and LEP populations.

For question (1)(f), local data and local knowledge may be particularly useful in answering this question.

Understanding the limitations of the HUD-provided data discussed in the introduction to these instructions, using local data and knowledge, complete question (2)(a). The Fair Housing Act protects individuals on the basis of race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability. HUD has provided data for this section only on race/ethnicity and national origin. Include any relevant information about other protected characteristics – but note that the analysis of disability is specifically considered in Section V(D). Program participants may include relevant information relating to persons with disabilities here, but still must address the questions in Section V(D).

For question (2)(b), program participants may include any additional relevant information related to their analysis of segregation in the jurisdiction and region, including the removal of barriers that prevent people from accessing housing in areas of opportunity, the development of affordable housing in such areas, housing mobility programs, housing preservation, and community revitalization efforts, where any such actions are designed to achieve fair housing outcomes such as increasing integration.

For question (3), identify all significant contributing factors. Consider the non-exhaustive list of factors provided and identify those factors that significantly create, contribute to, perpetuate, or increase the severity of segregation. For additional instructions on selecting contributing factors, refer to the introduction of these instructions.

R/ECAPs

For question (1)(a), refer to Maps 1, 3 and 4, which include outlined census tracts that meet the threshold criteria for racially or ethnically concentrated areas of poverty (R/ECAPs). The area within the outline meets the definition of an R/ECAP, as set forth in the rule at 24 C.F.R. § 5.152.

To answer question (1)(b), use Maps 1, 3, and 4 and Table 4. Maps 1, 3, and 4 are dot density maps showing the residential distribution of racial/ethnic, national origin, and limited English proficient (LEP) populations in the jurisdiction and region. These maps also include outlined overlays of R/ECAPs. The presence of residential segregation in R/ECAPs may appear as clusters of a single color of dots representing one protected class, or as clusters of more than one color of dots representing a number of protected classes but still excluding one or more protected classes. More integrated areas will appear as a variety of colored dots. Table 4 shows the percentage of persons living in R/ECAPS with certain protected characteristics (race/ethnicity, families with children, national origin) in the jurisdiction and the region. Note that the percentages reflect the proportion of the total population living in R/ECAPs that has a protected characteristic, not the proportion of individuals with a particular protected characteristic living in R/ECAPs. Table 4 can be compared to Table 1, which shows the total population in the jurisdiction and region for each of the groups shown in Table 4.

To answer question (1)(c), refer to Maps 1, 2, 3. Map 1 shows the outlines of current R/ECAPs. Map 2 shows the outlines of R/ECAPs in past years (1990 and 2000). Compare the current R/ECAP outlines with previous R/ECAP outlines and describe whether R/ECAPs have remained constant, whether new R/ECAPs have emerged, or whether certain R/ECAPs no longer exist. Maps 1, 2, and 3 also show dot density distributions by race/ethnicity, national origin and LEP, including R/ECAP outlines. Note whether the maps show any changes in areas that have moved in or out of R/ECAP status over time and the groups most affected by R/ECAPs.

Understanding the limitations of the HUD-provided data discussed in the instruction's introduction, using local data and knowledge, complete question (2)(a). The Fair Housing Act protects individuals on the basis of race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability. HUD has provided data for this section only on race/ethnicity and national origin. Include any relevant information about other protected characteristics, but note that the analysis of disability is specifically considered in Section V(D). Program participants may include relevant information relating to persons with disabilities here, but still must address the questions in Section V.(D).

For question (2)(b), program participants may include any additional relevant information related to their analysis of R/ECAPs in the jurisdiction and region, including the removal of barriers that prevent people from accessing housing in areas of opportunity, the development of affordable housing in such areas, housing mobility programs, housing preservation and community revitalization efforts, where any such actions are designed to achieve fair housing outcomes such as transforming R/ECAPs by addressing the combined effects of segregation and poverty. Relevant information may also include local assets and organizations.

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For question (3), consider the non-exhaustive list of factors provided, which are those most commonly associated with R/ECAPs, and identify those factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs. For additional instructions on selecting contributing factors, refer to the introduction of these instructions

Disparities in Access to Opportunity

For question (1), refer to Table 12. Table 12 provides index scores or values for the following opportunity indicator indices: Low Poverty; School Proficiency; Labor Market Engagement; Jobs Proximity; Low Transportation Costs; Transit Trips Index; and Environmental Health by race/ethnicity and households below the poverty line. A higher score on each of the indices would indicate: lower neighborhood poverty rates; higher levels of school proficiency; higher levels of labor engagement; closer proximity to jobs; lower transportation costs; closer access to public transportation; and greater neighborhood environmental quality (i.e., lower exposure rates to harmful toxins). Using the indices provided, program participants will be able to compare access to key opportunity assets with relative ease by consulting a single table and a series of maps. These indices are based on nationally available data sources. Local data and local knowledge may be particularly helpful in connection with these analyses

For the questions in (1)(a), use the School Proficiency Index in Table 12 and refer to Map 9. The School Proficiency Index measures the proficiency of elementary schools in the attendance area (where this information is available) of individuals sharing a protected characteristic or the proficiency of elementary schools within 1.5 miles of individuals with a protected characteristic where attendance boundary data are not available. The values for the School Proficiency Index are determined by the performance of 4th grade students on state exams. Map 9 consists of three sub-maps, showing the spatial distribution of racial/ethnic and national origin groups and families with children overlaid by shading that shows school proficiency levels for the jurisdiction and the region. The maps also include R/ECAP outlines. To answer questions (1)(a)(i), examine the School Proficiency Index, by race/ethnicity, and Map 9, by race/ethnicity, national origin, and family status, to identify differences in access to proficient schools by protected characteristic. For question (1)(a)(ii), refer to Map 9 by race/ethnicity, national origin, and family status to assess how residency patterns relate to the location of proficient schools. Note that, to the extent the questions require consideration of middle and high schools, local policies and practices, local knowledge (as defined at 24 C.F.R. § 5.152) will be relevant. Question (1)(a)(iii), may be answered using local data or local knowledge. Program participants should consider whether local school policies provide for alternative means of access to schools that are not reflected in the HUD-provided data.

For the questions (1)(b), refer to the Jobs Proximity Index and Labor Market Engagement Index in Table 12, and to Maps 10 and 11. The Jobs Proximity Index measures the physical distances between place of residence and jobs by race/ethnicity. The Labor Market Engagement Index provides a measure of unemployment rate, labor-force participation rate, and percent of the population ages 25 and above with at least a bachelor's degree, by neighborhood. Map 10 shows residency patterns of racial/ethnic and national origin groups and families with children overlaid by shading that shows the jobs proximity measure for the jurisdiction and the region. The map also includes R/ECAP outlines. Map 11 shows residency patterns of racial/ethnic and national origin groups and families with children overlaid by shading that shows labor engagement for the jurisdiction and the region. The map also includes R/ECAP outlines. To answer questions (1)(b)(i)-(iii), examine the indices' values by race/ethnicity, and Maps 10 and 11, by race/ethnicity, national origin, and family status, to identify differences in proximity to jobs and labor market engagement by protected characteristic.

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For the questions in (1)(c), refer to Table 12 (Low Transportation Cost Index[1] and the Transit Trips Index) and Maps 12 and 13. The Low Transportation Cost Index measures cost of transport and proximity to public transportation by neighborhood. The Transit Trips Index measures how often low-income families in a neighborhood use public transportation. Map 12 shows residency patterns of racial/ethnic and national origin groups and families with children overlaid by shading that shows transportation access at the neighborhood level. Separate maps are included for the jurisdiction and the region. These maps also include R/ECAP outlines. Map 13 shows residency patterns of racial/ethnic, national origin, and families with children overlaid by shading that shows low transportation costs at the census tract level. Separate maps are included for the jurisdiction and region. To answer questions (1)(c)(i) and (ii), examine the Low Transportation Cost Index and Transit Trips Index values in Table 12, by race/ethnicity, and Maps 12 and 13, by race/ethnicity, national origin, and family status, to identify differences in access to transportation by protected characteristic. For question (1)(c)(iii), program participants should consider whether transportation-related local programs, policies, and practices affect a person's access to proficient school, jobs, and other areas with opportunities. In answering this question, local knowledge (as defined at 24 C.F.R. § 5.152) will be relevant. Program participants should consider whether transportation systems designed for use of personal vehicles impact the ability of protected class groups' access to transportation due to the lack of vehicle ownership.

For question (1)(d), refer to the Low Poverty Index in Table 12 and Map 14. The Low Poverty Index uses rates of family poverty by household (based on the federal poverty line) to measure exposure to poverty by neighborhood. A higher score generally indicates less exposure to poverty at the neighborhood level. Map 14 shows residency patterns of racial/ethnic and national origin groups and families with children overlaid by shading that depicts poverty levels for the jurisdiction and the region. The map also includes R/ECAP outlines. To answer questions (1)(d)(i)-(iii), examine the Low Poverty Index values, by race/ethnicity, and Map 14, by race/ethnicity, national origin, and family status, to identify differences in poverty by protected characteristic. For question (1)(d)(iv), to the extent local policies and practices are discussed, local knowledge (as defined at 24 C.F.R. § 5.152) will be relevant.

For question (1)(e)(i) and (ii), refer to the Environmental Health Index in Table 12 and Map 15. The Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory and neurological toxins by neighborhood. Map 15 shows residency patterns of racial/ethnic and national origin groups and families with children overlaid by shading showing the level of exposure to environmental health hazards for the jurisdiction and the region. The map also includes R/ECAP outlines. To answer the questions, examine the Environmental Health Index values, by race/ethnicity, and Map 15, by race/ethnicity, national origin, and family status, to identify differences in exposure to environmental health hazards by protected characteristic. While the Environment Health Index is limited to issues related to air quality, program participants may also discuss other indicators of environmental health, based on local data and local knowledge. Environmental-related policies may include the siting of highways, industrial plants, or waste sites.

For question (1)(f)(i), refer to the answers provided in question (1)(a)-(e).

Understanding the limitations of the HUD-provided data discussed in the introduction to the instructions, using local data and knowledge, complete question (2)(a). The Fair Housing Act

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[1] Please note there is no corresponding map for the Low Transportation Cost Index. HUD anticipates a map may be provided in later releases of the Data Tool.

protects individuals on the basis of race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability. HUD has provided data for this section only on race/ethnicity, national origin, and family status. Include any relevant information about other protected characteristics, but note that the analysis of disability is specifically considered in Section V(D). Program participants may include relevant information relating to persons with disabilities here, but still must address the questions in Section V(D).

For question (2)(b), program participants may include any additional relevant information related to their analysis of disparities in access to opportunity in the jurisdiction and region, including the removal of barriers that prevent people from accessing housing in areas of opportunity, the development of affordable housing in such areas, housing mobility programs, housing preservation and community revitalization efforts, where any such actions are designed to achieve fair housing outcomes such as increasing access to opportunity.

For question (3), consider the non-exhaustive list of factors provided, which are those most commonly associated with disparities in access to opportunity, and identify those factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity. For additional instructions on selecting contributing factors, refer to the introduction of these instructions.

Disproportionate Housing Needs

For question (1)(a), refer to Tables 9 and 10. Table 9 shows the percentage of race/ethnicity groups and families with children experiencing two potential categories of housing need. The first category is households experiencing one of four housing problems: housing cost burden (defined as paying more than 30% of income for monthly housing costs including utilities), overcrowding, lacking a complete kitchen, or lacking plumbing. The second category is households experiencing "one of four severe housing problems" which are: severe housing cost burden (defined as paying more than half of one's income for monthly housing costs including utilities), overcrowding, and lacking a complete kitchen, or lacking plumbing. Table 10 shows the number of persons by race/ethnicity and family size experiencing severe housing cost burden.

For question (1)(b), refer to Maps 7 and 8. Map 7 shows the residential living patterns for persons by race/ethnicity, overlaid by shading indicating the percentage of households experiencing one or more housing problems. Darker shading indicates a higher prevalence of such problems. The map also includes R/ECAP outlines. Map 8 shows the same information overlaid on residential living patterns by national origin.

For question (1)(c), refer to Tables 9 and 11. Table 9 shows housing needs experienced by families with 5 or more persons (used to approximate the population of families with children). Table 11 shows the number of households occupying units of various sizes (0-1 bedrooms, 2 bedrooms, 3 or more bedrooms) in four publicly supported housing program categories (public housing, Project-based Section 8, Other HUD Multifamily, and HCV). Table 11 shows the number of households with children currently residing in each of those four program categories.

For question (1)(d), local data and local knowledge may be particularly useful in answering this question.

Understanding the limitations of the HUD-provided data discussed in the introduction to the instruction, using local data and knowledge, complete question (2). The Fair Housing Act protects individuals on the basis of race, color, religion, sex, familial status, national origin, or having a

disability or a particular type of disability. HUD has provided data for this section only on race/ethnicity, national origin, and family status. Include any relevant information about other protected characteristics, but note that the analysis of disability is specifically considered in Section V(D). Program participants may include any relevant information relating to persons with disabilities here, but still must address the questions in Section V(D).

For question (2)(b), program participants may include any additional relevant information related to their analysis of disproportionate housing needs in the jurisdiction and region, including the removal of barriers that prevent people from accessing housing in areas of opportunity, the development of affordable housing in such areas, housing mobility programs, housing preservation and community revitalization efforts, where any such actions are designed to achieve fair housing outcomes such as reducing disproportionate housing needs.

For question (3), consider the non-exhaustive list of factors provided, which are those most commonly associated with disproportionate housing needs, and identify those factors that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs. For additional instructions on selecting contributing factors, refer to the introduction of these instructions.

C. Publicly Supported Housing[2] Analysis

Data on publicly supported housing is grouped into five program categories: public housing; project-based Section 8; Section 8 tenant-based Housing Choice Vouchers (HCV); Other HUD Multifamily housing (including Section 202 Supportive Housing for the Elderly and Section 811Supportive Housing for Persons with Disabilities); and Low-Income Housing Tax Credit (LIHTC) housing. Relevant information may also include housing converted through the Rental Assistance Demonstration (RAD), which may be analyzed as part of Housing Choice Vouchers. HUD has included RAD as a separate category for two specific questions in this section for policy reasons. Some tables and maps provided include information on some of the program categories but not others based on availability of the data. Where a housing development includes more than one category of publicly supported housing, this development is reported in data for each housing category (e.g., project-based Section 8 combined with LIHTC). Note that other publicly supported housing programs, for instance those funded through state and local programs or by other federal agencies, such as USDA's Rural Housing Service and the Veteran's Administration, or other HUD programs that are not covered in the HUD-provided data may be relevant to the analysis.

Data related to public housing may be affected by asset management project (AMP) groupings.[3] For instance, where public housing agencies report data for developments located at different sites

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[2] The term "publicly supported housing" refers to housing assisted, subsidized, or financed with funding through Federal, State, or local agencies or programs as well as housing that is financed or administered by or through any such agencies or programs. HUD is currently providing data on five specific categories of housing: Public Housing; Project-Based Section 8; "Other HUD Multifamily Housing" (including Section 202 – Supportive Housing for the Elderly and Section 811 – Supportive Housing for Persons with Disabilities); Low Income Housing Tax Credit (LIHTC) housing; and Housing Choice Vouchers (HCV). Other publicly supported housing relevant to the analysis includes housing funded through state and local programs, other federal agencies, such as USDA and VA, or other HUD-funded housing not captured in the five categories listed above.

[3] The Operating Fund Program final rule, published on September 19, 2005, required PHAs to convert to asset management. In practice, this allowed PHAs to group buildings under asset management. All of the

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as one AMP, the map showing the locations of the categories of publicly supported housing will only display this data at one location. Similarly, the table showing the census tract and occupancy of public housing will only show AMP groupings once, rather than for each site. In certain circumstances AMP groupings may affect the fair housing analysis. For example, AMP groupings will impede siting and occupancy analyses where AMP groupings have combined buildings that are in demographically different neighborhoods. For this reason, local data and local knowledge relating to the siting and occupancy of publicly supported housing may be particularly useful in answering the questions in this section.

For questions (1)(a)(i) and (ii), refer to Tables 6 and 7. Tables 6 and 7 present data by race/ethnicity for persons occupying four categories of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily, and HCV) in the jurisdiction. The tables also provide race/ethnicity data for the total population in the jurisdiction and for persons meeting the income eligibility requirements for a relevant category of publicly supported housing. Relevant information may also include housing converted through RAD, which may be analyzed as part of Housing Choice Vouchers.

For questions (1)(b)(i) and (ii) refer to Maps 5 and 6, which are race/ethnicity dot density maps with a publicly supported housing overlay, including outlines of R/ECAPS. In Map 5, symbols representing four categories of publicly supported housing indicate the location of a development of that category of housing. Note that some developments may represent multiple buildings or projects that are not necessarily located at the same address the symbol represents. In Map 6, the density of use of Section 8 vouchers is layered over a race/ethnicity dot density map. Darker shading represents a heavier concentration of vouchers. Map 5 does not distinguish between developments that serve families, elderly, or persons with disabilities; however, projects serving these populations are often affected differently by laws, policies and practices, resulting in significantly different siting patterns. Local knowledge may be particularly useful in answering this portion of the question.

For question (1)(b)(iii), use Table 7, which shows the percentage of occupants in four publicly supported housing program categories (public housing, project-based Section 8, Other HUD Multifamily, and HCV) in units located either within R/ECAPs or outside of R/ECAPs. The table also breaks out this information by race/ethnicity, elderly and disability status. To answer the question, compare the percentage of occupants sharing a protected characteristic living in units located in R/ECAPS to the percentage of occupants sharing the same protected characteristic living in units outside of R/ECAPS. Relevant information may also include housing converted through RAD, which may be analyzed as part of Housing Choice Vouchers.

For question (1)(b)(iv)(A), refer to both the HUD-provided data and local data and local knowledge. Table 8 shows the racial/ethnic composition and percentage of households with children occupying public housing. Local data and local knowledge may be informative for both properties converted under RAD and for LIHTC developments.

Compare the demographic occupancy data of developments to other developments of the same category. In analyzing Table 8, be aware that the demographic occupancy information is affected by the size of the development – smaller developments may appear to have greater variance, but

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AMP groupings are reported as one unit and tied together through the assignment of the same project number.

note that in small developments, a difference of a few units may alter the overall percentage of the occupancy demographic composition.

For question (1)(b)(iv)(B), Table 8 is provided for program participants' use, however local data and local knowledge, including information obtained through the community participation process, may be particularly useful in answering this portion of the question.

For question (1)(b)(v), refer to Table 8 and Map 5. Table 8 includes development-level demographic characteristics of residents of three program categories (public housing, project-based Section 8, and Other HUD Multifamily).   Map 5 shows the location of individual developments for four program categories (public housing, project-based Section 8, Other HUD Multifamily, and LIHTC). Note that census tract boundaries may not align with "neighborhoods" or "areas" as commonly understood at the local level, and local knowledge may be useful to assist in the comparison.

Please note that HUD will add functionality to the Data and Mapping Tool to further sort and export census tract and occupancy demographic data from Map 5 to generate a table for the categories of publicly supported housing (i.e., public housing, project-based Section 8, Other HUD Multifamily Assisted developments (e.g., Sections 202 and 811), and LIHTC, provided that it will exclude occupancy demographic data for LIHTC developments, which should be analyzed using local data and local knowledge). Until such time, HUD provides program participants and the public with this data in an alternate tabular format in three ways: (1) directly to program participants, (2) through a link on the HUD Exchange AFFH webpage, and (3) as a hyperlink for download in Map 5 of the Data and Mapping Tool.

Compare the demographic occupancy data of developments to the areas in which they are located.

For question (1)(c)(i), refer to the opportunity indicators analyzed in Section D, and Maps 5 and 6, which are race/ethnicity dot density maps showing the locations of publicly supported housing developments (Map 5) and rates of Section 8 voucher utilization (Map 6) with R/ECAP outlines. Compare the locations of publicly supported housing to Maps 9 through 15, which depict the opportunity indicators. Note that while the location of housing may be relevant to analysis, it is not the only factor in analyzing disparities in access to opportunity. "Access" in this context encompasses consideration of infrastructure or policies related to where a person lives that impact an individual's ability to benefit from an opportunity, such as available transportation to a job, school enrollment policies, program eligibility criteria, or local labor laws. As noted above, Map 5 does not distinguish between developments that serve families, elderly, or persons with disabilities; however, projects serving these populations often reveal distinct patterns. Local knowledge may be particularly useful in answering this portion of the question.

For question 2(a), understanding the limitations of the HUD-provided data discussed in the introduction to the instructions, using local data and knowledge, complete question (2). The Fair Housing Act protects individuals on the basis of race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability. HUD has provided data for this section only on race/ethnicity, national origin, family status, and limited data on disability. Include any relevant information about other protected characteristics – but note that the analysis of disability is also specifically considered in Section V(D). Program participants may include an analysis of disability here, but still must include such analysis in Section V(D).

For question (2)(b), program participants may include any additional relevant information related to their analysis of publicly supported housing in the jurisdiction and region, including the removal

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of barriers that prevent people from accessing housing in areas of opportunity, the development of affordable housing in such areas, housing mobility programs, housing preservation and community revitalization efforts, where any such actions are designed to achieve fair housing outcomes such as reducing disproportionate housing needs, transforming R/ECAPs by addressing the combined effects of segregation coupled with poverty, increasing integration, and increasing access to opportunity, such as high-performing schools, transportation, and jobs.

For question (3), consider the non-exhaustive list of factors provided, which are those most commonly associated with publicly supported housing, and identify those factors that significantly create, contribute to, perpetuate, or increase the severity of the fair housing issues of segregation, R/ECAPs, access to opportunity and disproportionate housing needs in relation to publicly supported housing. For additional instructions on selecting contributing factors, refer to the introduction of these instructions.

D. Disability and Access Analysis

There are limited sources of nationally uniform data on the extent to which individuals with disabilities are able to access housing and other community assets. Local data and local knowledge may be particularly useful in completing this section, including, but not limited to, information provided by the public, outside organizations and other government agencies in the community participation process.

For question (1)(a), refer to Map 16 and Table 13. Map 16 depicts a dot density distribution by disability type (hearing, vision, cognition, ambulatory, self-care, independent living) for the jurisdiction and the region. The map also includes R/ECAP outlines. Table 13 provides data on the percentage of the population with types of disabilities in the jurisdiction and the region.

For question (1)(b), refer to Maps 16 and 17 and Table 15. Map 17 depicts a dot density distribution of persons with disabilities by age (5-17, 18-64, and 65+) for the jurisdiction and the region. Table 14 provides data on the percentage of the population with disabilities by age for the jurisdiction and the region.

For questions (2)(a) HUD is unable to provide data at this time, as there is limited nationally available disability-related data at this time, including data relating to accessible housing; however, to assist with answering these questions, program participants may refer to the maps provided by HUD to identify R/ECAPs or other segregated areas identified in previous sections.

For questions (2)(b) HUD is unable to provide data at this time. Single-family housing is generally not accessible to persons with disabilities unless state or local law requires it to be accessible or the housing is part of a HUD-funded program or other program providing for accessibility features. The Fair Housing Act requires that most multifamily properties built after 1991 meet federal accessibility standards. As a result, multifamily housing built after this date, if built in compliance with federal law would meet this minimum level of accessibility, while buildings built before this date generally would not be accessible. The age of housing stock can be a useful measure in answering this question. In addition, affordable housing subject to Section 504 of the Rehabilitation Act must include a percentage of units accessible for individuals with mobility impairments and units accessible for individuals with hearing or vision impairments. Map 5, which shows the location of four types of publicly supported housing, may also be useful in answering this question.

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For question (2)(c), refer to Table 15. Table 15 provides data on the number and percentage of persons with disabilities residing in four categories of publicly supported housing in both the jurisdiction and the region. In answering the question, consider policies and practices that impact individuals' ability to access the housing, including such things as wait list procedures, admissions or occupancy policies (e.g., income targeting for new admissions), residency preferences, availability of different accessibility features, and website accessibility.

Local data and knowledge will likely be particularly useful in answering questions (3)(a) and (b). Sources of location data and local knowledge may include, among others, individuals with disabilities, federally-funded independent living centers, state protection and advocacy organizations, advocacy organizations representing the spectrum of disabilities, state developmental disability councils and agencies, and state mental health/behavioral health agencies. Topics for consideration may include the length of wait lists for accessible units in publicly supported housing, availability of accessible units in non-publicly supported housing available to HCV participants, whether public funding (e.g. CDBG funds) or tax credits are available for reasonable modifications in rental units and/or for homeowners, whether accessible units are occupied by households requiring accessibility features, and whether publicly supported housing is in compliance with accessibility requirements.

The Fair Housing Act, Section 504, and the ADA contain mandates related to integrated settings for persons with disabilities. Integrated settings are those that enable individuals with disabilities to live and interact with individuals without disabilities to the greatest extent possible and receive the healthcare and supportive services from the provider of their choice. To answer questions (3)(a) and (b), refer to HUD's "Statement of the Department of Housing and Urban Development on the Role of Housing in Accomplishing the Goals of *Olmstead*."[4]

Local data and local knowledge will likely be particularly useful in answering questions. To ensure meaningful analysis of these questions, program participants may need to obtain information from state disability service authorities, which may include, for example, the developmental disabilities authority, mental health authority, social or human services department, and the state Medicaid agency, each of which is likely to have ready access to reliable information concerning the location and frequency of individuals with disabilities. A state's Olmstead Plan may contain useful information in answering these questions.

For questions (4)(a)-(c), HUD is unable to provide data, as there is limited nationally available disability-related data. Local data and local knowledge will likely be particularly useful in answering questions.

For question (5)(a), program participants may refer to Tables 9, 10, and 11 and Maps 7 and 8 for data relating to disproportionate housing needs. However, this data is not specific to individuals with disabilities, as such local data and local knowledge may be particularly useful in answering this question.

Understanding the limitations of the HUD-provided data discussed above, complete question (6)(a). The Fair Housing Act protects individuals on the basis of race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability. HUD has provided

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[4] HUD's *Olmstead* Statement can be found at:
http://portal.hud.gov/hudportal/documents/huddoc?id=OlmsteadGuidnc060413.pdf.

data for this section only on certain types of disabilities and for the ages of persons with disabilities. Include any relevant information about other protected characteristics.

For question (6)(b), program participants may include any additional relevant information related to their analysis of disability and access in the jurisdiction and region, including the removal of barriers that prevent people from accessing housing in areas of opportunity, the development of affordable housing in such areas, housing mobility programs, housing preservation, and community revitalization efforts, where any such actions are designed to achieve fair housing outcomes such as reducing disproportionate housing needs, transforming R/ECAPs by addressing the combined effects of segregation coupled with poverty, increasing integration, and increasing access to opportunity, such as high-performing schools, transportation, and jobs.

For question (7), consider the list of factors provided, which are those most commonly associated with disability and access, and identify those factors that significantly create, contribute to, perpetuate, or increase the severity of the fair housing issues of segregation, R/ECAPs, access to opportunity and disproportionate housing needs in relation to disability and access. For additional instructions on selecting contributing factors, refer to the introduction of these instructions.

E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

Complete question (1). A summary of cases would typically include the parties, claims, and current status.

Complete question (2).

For question (3), list the agencies and organizations that provide fair housing information in the jurisdiction and region. Include a description of their capacity and resources available to them.

For questions (4)(a) and (b), program participants may include any additional relevant information related to their analysis of fair housing enforcement, outreach capacity, and resources in the jurisdiction and region, including the removal of barriers that prevent people from accessing housing in areas of opportunity, where any such actions are designed to achieve fair housing outcomes such as reducing disproportionate housing needs, transforming R/ECAPs by addressing the combined effects of segregation coupled with poverty, increasing integration, and increasing access to opportunity, such as high-performing schools, transportation, and jobs.

For question (5), consider the list of factors provided, which are those most commonly associated with fair housing enforcement, outreach capacity, and resources, and identify those factors that significantly create, contribute to, perpetuate, or increase the severity of the fair housing issues of segregation, R/ECAPs, access to opportunity and disproportionate housing needs in relation to fair housing enforcement, outreach capacity, and resources. For additional instructions on selecting contributing factors, refer to the introduction of these instructions.

Part VI: Fair Housing Goals and Priorities

To answer question (1), use the contributing factors selected in prior sections and prioritize them. In prioritizing contributing factors, program participants shall give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance. Provide a justification for the prioritization of the factors. Also describe the prioritization method used. For example, if using a 1 through 5 ranking system, identify whether 1 or 5 reflects the highest priority.

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Note that contributing factors may be outside the ability of program participants to directly control or influence.   In such cases, those factors must be included in the prioritization. There still may be policy options or goals that program participants should identify, while recognizing the limitations involved.

For question (2), set one or more goals to address each fair housing issue with significant contributing factors. For each goal, program participants must identify one or more contributing factors that the goal is designed to address, describe how the goal relates to overcoming the identified contributing factor(s) and related fair housing issue, and identify metrics and milestones for determining what fair housing results will be achieved. For instance, where segregation in a development or geographic area is determined to be a fair housing issue, with at least one significant contributing factor, HUD would expect the AFH to include one or more goals to reduce the segregation.

In answering question (2), use the table provided. Provide at least one goal addressing each fair housing issue. In the "Goals" column, state the goal that is being set. In the "Contributing Factors" column, identify the contributing factors the goal is designed to overcome. In the "Fair Housing Issues" column, identify the related fair housing issues the goal is designed to address. In the "Metrics and Milestones" column, identify the metrics and milestones program participants will use for determining what fair housing results will be achieved and a timeframe for achievement. Finally, in the "Discussion" row, provide an explanation of how the goal being set is going to address the contributing factors and related fair housing issues. For program participants submitting jointly, denote which program participant is responsible for each particular goal. If program participants are setting joint goals, explain the responsibilities of each program participant with respect to the joint goal. Please note that the number of goals is not limited by the table provided. Program participants are encouraged to set more goals than the table allows for currently.[5]

While the statutory duty to affirmatively further fair housing requires program participants to affirmatively further fair housing, the final rule does not mandate specific outcomes for the planning process. Instead, recognizing the importance of local decision-making, the analysis conducted in the AFH is meant to help guide public sector housing and community development planning and investment decisions in being better informed about fair housing concerns and consequently help program participants to be better positioned to fulfill their obligation to affirmatively further fair housing.

Program participants should note that the strategies and actions, and the specifics of funding decisions, subject to the consolidated plan, PHA plan, or other applicable planning process are not required to be in the AFH. However, the goals set by program participants will factor into these planning processes. These goals will form the basis for strategies and actions in the subsequent planning documents. As stated in the regulatory text at 24 C.F.R. § 5.150, "a program participant's strategies and actions must affirmatively further fair housing and may include various activities, such as developing affordable housing, and removing barriers to the development of such housing, in areas of high opportunity; strategically enhancing access to opportunity, including through targeted investment in neighborhood revitalization or stabilization; through preservation or rehabilitation of existing affordable housing; promoting greater housing choice within or outside areas of concentrated poverty and access to areas of high opportunity; and improving community

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[5] HUD anticipates that the online user interface that is currently under development will allow for program participants to set as many goals as a program participant wishes.

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assets such as quality schools, employment, and transportation." Goals addressing fair housing choice may include, for example, enhanced mobility options that afford access to areas of high opportunity.

Certification and Submission

Please note, for a joint or regional AFH, each collaborating program participant must authorize a representative to sign the certification on the program participant's behalf. In a joint or regional AFH, when responding to each question, collaborating program participants may provide joint analyses and individual analyses. The authorized representative of each program participant certifies only to information the program participant provides individually or jointly in response to each question in the assessment. The authorized representative does not certify for information applicable only to other collaborating program participants' analyses, if any.

APPENDIX A – HUD-Provided Maps

Map 1 Race/Ethnicity – Current (2010) race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Map 2 Race/Ethnicity Trends – Past (1990 and 2000) race/ethnicity dot density ~~map~~maps for Jurisdiction and Region with R/ECAPs

- ~~Race/Ethnicity Trends, 1990~~
- ~~Race/Ethnicity Trends, 2000~~

Map 3 National Origin – Current 5 most populous national origin ~~(top 5⁶)~~groups dot density map for Jurisdiction and Region with R/ECAPs

Map 4 LEP – LEP persons by 5 most populous languages dot density map for Jurisdiction and Region with R/ECAPs

~~**Map 4 LEP** – LEP persons (by top 5 languages⁷) for Jurisdiction and Region with R/ECAPs~~

Map 5 ~~Subsidized/Assisted~~Publicly Supported Housing and Race/Ethnicity – ~~Housing Choice,~~ Public Housing, Project-Based Section 8, Other Multifamily, and LIHTC locations mapped with race/ethnicity dot density map with R/ECAPs, distinguishing categories of publicly supported housing by color, for the Jurisdiction and Region

Map 6 Housing Choice Vouchers and Race/Ethnicity – Housing Choice ~~Voucher~~Vouchers with race/ethnicity dot density map and R/ECAPs, for the Jurisdiction and Region

Map 7 Housing Burden and Race/Ethnicity – Households experiencing one or more housing burdens in Jurisdiction and Region with ~~R/ECAPs and~~ race/ethnicity dot density map and R/ECAPs

Map 8 Housing Burden and National Origin – Households experiencing one or more housing burdens in Jurisdiction and Region with ~~R/ECAPs and~~ national origin dot density map and R/ECAPs

Map 9 Demographics and School Proficiency – School proficiency ~~Index~~thematic map for Jurisdiction and Region with race/ethnicity, national origin, and family status~~, maps~~ and R/ECAPs

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[6] Please note, the map currently states "(top 5)." HUD anticipants that this terminology will be replaced with the following language: "(5 most populous)."

[7] Please note, the map currently states "(top 5)." HUD anticipants that this terminology will be replaced with the following language: "(5 most commonly used languages)."

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- School Proficiency and Race/Ethnicity
- School Proficiency and National Origin
- School Proficiency and Family Status

Map 10 Demographics and Job Proximity – Jobs Proximity Index Job proximity thematic map for Jurisdiction and Region with race/ethnicity, national origin, and family status maps and R/ECAPs

- Job Proximity and Race/Ethnicity
- Job Proximity and National Origin
- Job Proximity and Family Status

Map 11 Demographics and Labor Market – **Engagement** – Labor engagement Index thematic map for Jurisdiction and Region with race/ethnicity, national origin, and family status maps and R/ECAPs

- Labor Market and Race/Ethnicity
- Labor Market and National Origin
- Labor Market and Family Status

Map 12 Demographics and Transit – **Trips** – Transit proximity Index thematic map for Jurisdiction and Region with race/ethnicity, national origin, and family status maps and R/ECAPs

- Transit and Race/Ethnicity
- Transit and National Origin
- Transit and Family Status

Map 13 Demographics and Poverty – **Low** Poverty Index**Transportation Costs** – Low transportation cost thematic map for Jurisdiction and Region with race/ethnicity, national origin, and family status maps and R/ECAPs

- Poverty and Race/Ethnicity
- Poverty and National Origin
- Poverty and Family Status

Map 14 Demographics and Environmental Health – Environmental Health Index**Poverty** – Low poverty thematic map for Jurisdiction and Region with race/ethnicity, national origin, and family status maps and R/ECAPs

- Environmental Health and Race/Ethnicity
- Environmental Health and National Origin
- Environmental Health and Family Status

Map 15 Demographics and Environmental Health – Environmental health thematic map for Jurisdiction and Region with race/ethnicity, national origin, and family status maps with R/ECAPs

Map 16 Disability by Type – ~~Dot density map of the~~ Population of persons with disabilities dot density map by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

- ~~Hearing, Vision, and Cognitive Disability~~
- ~~Ambulatory, Self-Care and Independent Living Disability~~

Map ~~16~~17 Disability by Age Group – All persons with disabilities by age range (5-17~~)(;~~ 18-64~~)(; and~~ 65+) dot density map with R/ECAPs for Jurisdiction and Region

APPENDIX B – HUD-Provided Tables

Table 1 Demographics – Tabular demographic data for Jurisdiction and Region (including total population, the number and percentage of persons by race/ethnicity, national origin (~~top~~ 10 most populous), LEP (~~top~~ 10 most populous), disability (by disability type), sex, age range (under 18, 18-64, 65 ~~plus),~~+), and households with children)

Table 2 Demographic Trends – Tabular demographic trend data for Jurisdiction and Region ~~for above categories except disability, LEP (top 10[8]),~~(including the number and percentage of persons by race/ethnicity, total national origin (~~top 10[9]) (substitution of total LEP and total~~ foreign born ~~trend data))~~, total LEP, sex, age range (under 18, 18-64, 65+), and households with children)

Table 3 Racial/Ethnic Dissimilarity – Tabular race/ethnicity dissimilarity index for Jurisdiction and Region

~~**Table 4 Racial/Ethnic Dissimilarity Trends –** Tabular race/ethnicity dissimilarity index trend data for Jurisdiction and Region~~

~~**Table 5 LEP** - Tabular data for Jurisdiction and Region for numbers and percentages of LEP persons (top 10[10])~~

~~**Table 6**~~**Table 4 R/ECAP Demographics –** Tabular data for the percentage of racial/ethnic groups, families with children, and national origin groups (~~top 10[11]) in~~10 most populous) for the Jurisdiction and Region who reside in R/ECAPs

Table ~~7 Public~~5 Publicly Supported Housing Units ~~-~~**by Program Category –** Tabular data for total units by 4 categories of publicly supported housing ~~-~~in the Jurisdiction (Public Housing, Project-Based Section 8, Other Multifamily, ~~and the HCV Program - in Jurisdiction~~

~~**Table 8 Public**~~ Housing ~~Unit~~Choice Voucher (HCV) Program) for the Jurisdiction

Table 6 Publicly Supported Housing Residents by Race/Ethnicity – Tabular race/ethnicity data for 4 categories of publicly supported ~~-~~housing (Public Housing, Project-Based Section 8, Other Multifamily, ~~and~~HCV) in the ~~HCV Program -~~Jurisdiction compared to the ~~Jurisdiction~~population as a whole, and to persons earning 30% AMI, in the Jurisdiction

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[8] Please note, the table currently states "(top 10)." HUD anticipants that this terminology will be replaced with the following language: "(10 most populous)."

[9] Please note, the table currently states "(top 10)." HUD anticipants that this terminology will be replaced with the following language: "(10 most populous)."

[10] Please note, the table currently states "(top 10)." HUD anticipants that this terminology will be replaced with the following language: "(10 most populous)."

[11] Please note, the table currently states "(top 10)." HUD anticipants that this terminology will be replaced with the following language: "(10 most populous)."

Table ~~9~~7 R/ECAP and Non-R/ECAP Demographics by ~~Public~~Publicly Supported Housing ~~Type~~Program Category – Tabular data on publicly supported housing units and R/ECAPs for the Jurisdiction

Table ~~10~~8 Demographics ~~by Public~~of Publicly Supported Housing Developments~~–~~ by Program Category – Development ~~Census tract~~ level demographics by Public Housing, Project-Based Section 8, and Other Multifamily[12] for the Jurisdiction

Table ~~11~~9 Demographics of Households with Disproportionate Housing ~~Burden Needs –~~ Tabular data of total households in the Jurisdiction and Region and the total number and percentage of households experiencing one or more housing burdens by race/ethnicity and family size in the Jurisdiction and Region

Table ~~12~~10 Demographics of Households with Severe Housing Cost Burden – Tabular data of the total number of households in the Jurisdiction and Region and the number ~~of households~~ and percentage of households experiencing severe housing burdens by race/ethnicity for the Jurisdiction and Region

~~Table 13~~ Table 11 Publicly Supported Housing by Program Category: Units by Number of Bedrooms and ~~Presence~~Number of Children ~~by Public Housing Type~~– Tabular data on the number of bedrooms for units ~~for~~of 4 categories of publicly supported housing ~~–~~(Public Housing, Project-Based Section 8, Other Multifamily, ~~and~~HCV) for the ~~HCV Program~~Jurisdiction

Table ~~14 Community Assets~~12 Opportunity Indicators by Race/Ethnicity – Tabular data ~~showing~~of opportunity indices for school proficiency, jobs proximity, labor-market engagement, transit~~,~~ trips, low ~~transit cost~~transportation costs, low poverty, and environmental health for the Jurisdiction and Region by race/ethnicity and among ~~poor~~ households below the Federal poverty line.

Table ~~15~~13 Disability by Type – Tabular data of persons with vision, hearing, cognitive, ambulatory, self-care, and independent living ~~difficulties~~disabilities for the Jurisdiction and Region

Table ~~16~~14 Disability by Age Group – Tabular data of persons with disabilities by age range (5-17~~)(,~~ 18-64~~)(65,~~ and ~~over)~~65+) for the Jurisdiction and Region

Table ~~17~~15 Disability by ~~Public~~Publicly Supported Housing ~~Type~~Program Category – Tabular data on disability and publicly supported housing for the Jurisdiction and Region

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[12] Please note that, for the first year, census tract level demographic data in which publicly supported housing developments are located, also including LIHTC developments, are available through the AFFH Data and Mapping Tool which includes a data query function and ability to export tables.

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APPENDIX C – Contributing Factors Descriptions

Access to financial services
The term "financial services" refers here to economic services provided by a range of quality organizations that manage money, including credit unions, banks, credit card companies, and insurance companies. These services would also include access to credit financing for mortgages, home equity, and home repair loans. Access to these services includes physical access - often dictated by the location of banks or other physical infrastructure - as well as the ability to obtain credit, insurance or other key financial services. Access may also include equitable treatment in receiving financial services, including equal provision of information and equal access to mortgage modifications. For purposes of this contributing factor, financial services do not include predatory lending including predatory foreclosure practices, storefront check cashing, payday loan services, and similar services. Gaps in banking services can make residents vulnerable to these types of predatory lending practices, and lack of access to quality banking and financial services may jeopardize an individual's credit and the overall sustainability of homeownership and wealth accumulation.

Access to proficient schools for persons with disabilities
Individuals with disabilities may face unique barriers to accessing proficient schools. In some jurisdictions, some school facilities may not be accessible or may only be partially accessible to individuals with different types of disabilities (often these are schools built before the enactment of the ADA or the Rehabilitation Act of 1973). In general, a fully accessible building is a building that complies with all of the ADA's requirements and has no barriers to entry for persons with mobility impairments. It enables students and parents with physical or sensory disabilities to access and use all areas of the building and facilities to the same extent as students and parents without disabilities, enabling students with disabilities to attend classes and interact with students without disabilities to the fullest extent. In contrast, a partially accessible building allows for persons with mobility impairments to enter and exit the building, access all relevant programs, and have use of at least one restroom, but the entire building is not accessible and students or parents with disabilities may not access areas of the facility to the same extent as students and parents without disabilities. In addition, in some instances school policies steer individuals with certain types of disabilities to certain facilities or certain programs or certain programs do not accommodate the disability-related needs of certain students.

Access to publicly supported housing for persons with disabilities
The lack of a sufficient number of accessible units or lack of access to key programs and services poses barriers to individuals with disabilities seeking to live in publicly supported housing. For purposes of this assessment, publicly supported housing refers to housing units that are subsidized by federal, state, or local entities. "Accessible housing" refers to housing that accords individuals with disabilities equal opportunity to use and enjoy a dwelling. The concept of "access" here includes physical access for individuals with different types of disabilities (for example, ramps and other accessibility features for individuals with mobility impairments, visual alarms and signals for individuals who are deaf or hard of hearing, and audio signals, accessible signage, and other accessibility features for individuals who are blind or have low vision), as well as the provision of auxiliary aids and services to provide effective communication for individuals who are deaf or hard of hearing, are blind or have low vision, or individuals who have speech impairments. The concept of "access" here also includes programmatic access, which implicates such policies as application procedures, waitlist procedures, transfer procedures and reasonable accommodation procedures.

Access to transportation for persons with disabilities
Individuals with disabilities may face unique barriers to accessing transportation, including both public

and private transportation, such as buses, rail services, taxis, and para-transit. The term "access" in this context includes physical accessibility, policies, physical proximity, cost, safety, reliability, etc. It includes the lack of accessible bus stops, the failure to make audio announcements for persons who are blind or have low vision, and the denial of access to persons with service animals. The absence of or clustering of accessible transportation and other transportation barriers may limit the housing choice of individuals with disabilities.

Admissions and occupancy policies and procedures, including preferences in publicly supported housing
The term "admissions and occupancy policies and procedures" refers here to the policies and procedures used by publicly supported housing providers that affect who lives in the housing, ~~These~~ including policies and procedures related to marketing, advertising vacancies, applications, tenant selection, assignment, and maintained or terminated occupancy. Procedures that may relate to fair housing include, but are not limited to:

- Admissions preferences (e.g. residency preference, preferences for local workforce, etc.)
- Application, admissions, and waitlist policies (e.g. in-person application requirements, rules regarding applicant acceptance or rejection of units, waitlist time limitations, first come first serve, waitlist maintenance, etc~~).~~).
- Income thresholds for new admissions or for continued eligibility.
- Designations of housing developments (or portions of developments) for the elderly and/or persons with disabilities.
- Occupancy limits.
- Housing providers' policies for processing reasonable accommodations and modifications requests.
- Credit or criminal record policies.
- Eviction policies and procedures.

The availability of affordable units in a range of sizes
The provision of affordable housing is often important to individuals with certain protected characteristics because groups are disproportionately represented among those who would benefit from low-cost housing. What is "affordable" varies by circumstance, but an often used rule of thumb is that a low- or moderate-income family can afford to rent or buy a decent-quality dwelling without spending more than 30 percent of its income. This contributing factor refers to the availability of units that a low- or moderate-income family could rent or buy, including one bedroom units and multi-bedroom units for larger families. When considering availability, consider transportation costs, school quality, and other important factors in housing choice. Whether affordable units are available with a greater number of bedrooms and in a range of different geographic locations may be a particular barrier facing families with children.

The availability, type, frequency, and reliability of public transportation
Public transportation is shared passenger transport service available for use by the general public, including buses, light rail, and rapid transit. Public transportation includes paratransit services for persons with disabilities. The availability, type, frequency, and reliability of public transportation affect which households are connected to community assets and economic opportunities. Transportation policies that are premised upon the use of a personal vehicle may impact public transportation. "Availability" as used here includes geographic proximity, cost, safety and accessibility, as well as whether the transportation connects individuals to places they need to go such as jobs, schools, retail establishments, and healthcare. "Type" refers to method of transportation such as bus or rail. "Frequency" refers to the interval at which

the transportation runs. "Reliability" includes such factors as an assessment of how often trips are late or delayed, the frequency of outages, and whether the transportation functions in inclement weather.

Community opposition

The opposition of community members to proposed or existing developments—including housing developments, affordable housing, publicly supported housing (including use of housing choice vouchers), multifamily housing, or housing for persons with disabilities—is often referred to as "Not in my Backyard," or NIMBY-ism. This opposition is often expressed in protests, challenges to land-use requests or zoning waivers or variances, lobbying of decision-making bodies, or even harassment and intimidation. Community opposition can be based on factual concerns (concerns are concrete and not speculative, based on rational, demonstrable evidence, focused on measurable impact on a neighborhood) or can be based on biases (concerns are focused on stereotypes, prejudice, and anxiety about the new residents or the units in which they will live). Community opposition, when successful at blocking housing options, may limit or deny housing choice for individuals with certain protected characteristics.

Deteriorated and abandoned properties

The term "deteriorated and abandoned properties" refers here to residential and commercial properties unoccupied by an owner or a tenant, which are in disrepair, unsafe, or in arrears on real property taxes. Deteriorated and abandoned properties may be signs of a community's distress and disinvestment and are often associated with crime, increased risk to health and welfare, plunging decreasing property values, and municipal costs. The presence of multiple unused or abandoned properties in a particular neighborhood may have resulted from mortgage or property tax foreclosures. The presence of such properties can raise serious health and safety concerns and may also affect the ability of homeowners with protected characteristics to access opportunity through the accumulation of home equity. Demolition without strategic revitalization and investment can result in further deterioration of already damaged neighborhoods.

Displacement of residents due to economic pressures

The term "displacement" refers here to a resident's undesired departure from a place where an individual has been living. "Economic pressures" may include, but are not limited to, rising rents, rising property taxes related to home prices, rehabilitation of existing structures, demolition of subsidized housing, loss of affordability restrictions, and public and private investments in neighborhoods. Such pressures can lead to loss of existing affordable housing in areas experiencing rapid economic growth and a resulting loss of access to opportunity assets for lower income families that previously lived there. Where displacement disproportionately affects persons with certain protected characteristic, the displacement of residents due to economic pressures may exacerbate patterns of residential segregation.

Impediments to mobility

The term "impediments to mobility" refers here to barriers faced by individuals and families when attempting to move to a neighborhood or area of their choice, especially integrated areas and areas of opportunity. This refers to both Housing Choice Vouchers and other public and private housing options. Many factors may impede mobility, including, but not limited to:

- Lack of quality mobility counseling. Mobility counseling is designed to assist families in moving from high-poverty to low-poverty neighborhoods that have greater access to opportunity assets appropriate for each family (e.g. proficient schools for families with children or effective public transportation.). Mobility counseling can include a range of options including, assistance for families for "second moves" after they have accessed stable housing, and ongoing post-move support for families.
- Lack of appropriate payment standards, including exception payment standards to the standard fair market rent (FMR). Because FMRs are generally set at the 40th percentile of the

metropolitan-wide rent distribution, some of the most desirable neighborhoods do not have a significant number of units available in the FMR range. Exception payment standards are separate payment standard amounts within the basic range for a designated part of an FMR area. Small areas FMRs, which vary by zip code, may be used in the determination of potential exception payment standard levels to support a greater range of payment standards.

- Jurisdictional fragmentation among multiple providers of publicly supported housing that serve single metropolitan areas; and lack of regional cooperation mechanisms, including PHA jurisdictional limitations.
- HCV portability issues that prevent a household from using a housing assistance voucher issued in one jurisdiction when moving to another jurisdiction where the program is administered by a different local PHA.
- Lack of a consolidated waitlist for all assisted housing available in the metropolitan area.
- Discrimination based on source of income, including SSDI, Housing Choice Vouchers, or other tenant-based rental assistance.

Inaccessible buildings, sidewalks, pedestrian crossings, or other infrastructure
Many public buildings, sidewalks, pedestrian crossings, or other infrastructure components are inaccessible to individuals with disabilities including persons with mobility impairments, individuals who are deaf or hard of hearing, and persons who are blind or have low vision. These accessibility issues can limit realistic housing choice for individuals with disabilities. Inaccessibility is often manifest by the lack of curb cuts, lack of ramps, and the lack of audible pedestrian signals. While the Americans with Disabilities Act and related civil rights laws establish accessibility requirements for infrastructure, these laws do not apply everywhere and/or may be inadequately enforced.

~~Lack of access to~~Inaccessible government facilities or services
Inaccessible government facilities and services may pose a barrier to fair housing choice for individuals with disabilities by limiting access to important community assets such as public meetings, social services, libraries, and recreational facilities. Note that the concept of accessibility includes both physical access (including to websites and other forms of communication) as well as policies and procedures~~).~~. While the Americans with Disabilities Act and related civil rights laws require that newly constructed and altered government facilities, as well as programs and services, be accessible to individuals with disabilities, these laws may not apply in all circumstances and/or may be inadequately enforced.

~~Lack of access to proficient schools~~
~~Individuals with disabilities may face unique barriers to accessing proficient schools. In some jurisdictions, some school facilities may not be accessible or may only be partially accessible to individuals with different types of disabilities (often these are schools built before the enactment of the ADA or the Rehabilitation Act of 1973). In general, a fully accessible building is a building that complies with all of the ADA's requirements and has no barriers to entry for persons with mobility impairments. It enables students and parents with physical or sensory disabilities to access and use all areas of the building and facilities to the same extent as students and parents without disabilities, enabling students with disabilities to attend classes and interact with students without disabilities to the fullest extent. In contrast, a partially accessible building allows for persons with mobility impairments to enter and exit the building, access all relevant programs, and have use of at least one restroom, but the entire building is not accessible and students or parents with disabilities may not access areas of the facility to the same extent as students and parents without disabilities. In addition, in some instances school policies steer individuals with certain types of disabilities to certain facilities or certain programs or certain programs do not accommodate the disability-related needs of certain students.~~

IV

Lack of affordable, accessible housing in a range of unit sizes
What is "affordable" varies by circumstance, but an often used rule of thumb is that a low- or moderate-income family can afford to rent or buy a decent-quality dwelling without spending more than 30 percent of its income. For purposes of this assessment, "accessible housing" refers to housing that accords individuals with disabilities equal opportunity to use and enjoy a dwelling. Characteristics that affect accessibility may include physical accessibility of units and public and common use areas of housing, as well as application procedures, such as first come first serve waitlists, inaccessible websites or other technology, denial of access to individuals with assistance animals, or lack of information about affordable accessible housing. The clustering of affordable, accessible housing with a range of unit sizes may also limit fair housing choice for individuals with disabilities.

Lack of affordable in-home or community-based supportive services
The term "in-home or community-based supportive services" refers here to medical and other supportive services available for targeted populations, such as individuals with mental illnesses, cognitive or developmental disabilities, and/or physical disabilities in their own home or community (as opposed to in institutional settings). Such services include personal care, assistance with housekeeping, transportation, in-home meal service, integrated adult day services and other services (including, but not limited to, medical, social, education, transportation, housing, nutritional, therapeutic, behavioral, psychiatric, nursing, personal care, and respite). They also include assistance with activities of daily living such as bathing, dressing, eating, and using the toilet, shopping, managing money or medications, and various household management activities, such as doing laundry. Public entities must provide services to individuals with disabilities in community settings rather than institutions when: 1) such services are appropriate to the needs of the individual; 2) the affected persons do not oppose community-based treatment; and 3) community-based services can be reasonably accommodated, taking into account the resources available to the public entity and the needs of others who are receiving disability-related

services from the entity. Assessing the cost and availability of these services is also an important consideration, including the role of state Medicaid agencies. The outreach of government entities around the availability of community supports to persons with disabilities in institutions may impact these individuals' knowledge of such supports and their ability to transition to community-based settings.

Lack of affordable, integrated housing for individuals who need supportive services

What is "affordable" varies by ~~circumstance, but an often used rule~~the circumstances affecting the individual, and includes the cost of ~~thumb is that a low- or moderate-income family can afford to rent or buy a decent-quality dwelling without spending more than 30 percent of its income~~housing and services taken together. Integrated housing is housing where individuals with disabilities can live and interact with persons without disabilities to the fullest extent possible. In its 1991 rulemaking implementing Title II of the ADA, the U.S. Department of Justice defined "the most integrated setting appropriate to the needs of qualified individuals with disabilities" as "a setting that enables individuals with disabilities to interact with nondisabled persons to the fullest extent possible." By contrast, segregated settings are occupied exclusively or primarily by individuals with disabilities. Segregated settings sometimes have qualities of an institutional nature, including, but not limited to, regimentation in daily activities, lack of privacy or autonomy, policies limiting visitors, limits on individuals' ability to engage freely in community activities and manage their own activities of daily living, or daytime activities primarily with other individuals with disabilities. For purposes of this tool "supportive services" means medical and other voluntary supportive services available for targeted populations groups, such as individuals with mental illnesses, intellectual or developmental disabilities, and/or physical disabilities, in their own home or community (as opposed to institutional settings). Such services may include personal care, assistance with housekeeping, transportation, in-home meal service, integrated adult day services and other services. They also include assistance with activities of daily living such as bathing, dressing, and using the toilet, shopping, managing money or medications, and various household management activities, such as doing laundry.

Lack of assistance for housing accessibility modifications

The term "housing accessibility modification" refers here to structural changes made to existing premises, occupied or to be occupied by a person with a disability, in order to afford such person full enjoyment and use of the premises. Housing accessibility modifications can include structural changes to interiors and exteriors of dwellings and to common and public use areas. Under the Fair Housing Act, landlords are required by fair housing laws to permit certain reasonable modifications to a housing unit, but are not required to pay for the modification unless the housing provider is a recipient of Federal financial assistance and therefore subject to Section 504 of the Rehabilitation Act or is covered by the Americans with Disabilities Act (in such cases the recipient must pay for the structural modification as a reasonable accommodation for an individual with disabilities). However, the cost of these modifications can be prohibitively expensive. Jurisdictions may consider establishing a modification fund to assist individuals with disabilities in paying for modifications or providing assistance to individuals applying for grants to pay for modifications.

Lack of assistance for transitioning from institutional settings to integrated housing

The integration mandate of the ADA and *Olmstead v. L.C.*, 527 U.S. 581 (1999) (*Olmstead*) compels states to offer community-based health care services and long-term services and supports for individuals with disabilities who can live successfully in housing with access to those services and supports. In practical terms, this means that states must find housing that enables them to assist individuals with disabilities to transition out of institutions and other segregated settings and into the most integrated setting appropriate to the needs of each individual with a disability. A critical consideration in each state is the range of housing options available in the community for individuals with disabilities and whether those options are largely limited to living with other individuals with disabilities, or whether those options

include substantial opportunities for individuals with disabilities to live and interact with individuals without disabilities. For further information on the obligation to provide integrated housing opportunities, please refer to HUD's Statement on the Role of Housing in Accomplishing the Goals of *Olmstead*, the U.S. Department of Justice's Statement on *Olmstead* Enforcement, as well as the U.S. Department of Health and Human Services' Centers for Medicare and Medicaid Services final rule and regulations regarding Home and Community-Based Setting requirements. Policies that perpetuate segregation may include: inadequate community-based services; reimbursement and other policies that make needed services unavailable to support individuals with disabilities in mainstream housing; conditioning access to housing on willingness to receive supportive services; incentivizing the development or rehabilitation of segregated settings. Policies or practices that promote community integration may include: the administration of long-term State or locally-funded tenant-based rental assistance programs; applying for funds under the Section 811 Project Rental Assistance Demonstration; implementing special population preferences in the HCV and other programs; incentivizing the development of integrated supportive housing through the LIHTC program; ordinances banning housing discrimination of the basis of source of income; coordination between housing and disability services agencies; increasing the availability of accessible public transportation.

Lack of community revitalization strategies
The term "community revitalization strategies" refers here to realistic planned activities to improve the quality of life in areas that lack public and private investment, services and amenities, have significant deteriorated and abandoned properties, or other indicators of community distress. Revitalization can include a range of activities such as improving housing, attracting private investment, creating jobs, and expanding educational opportunities or providing links to other community assets. Strategies may include such actions as rehabilitating housing; offering economic incentives for housing developers/sponsors, businesses (for commercial and employment opportunities), bankers, and other interested entities that assist in the revitalization effort; and securing financial resources (public, for-profit, and nonprofit) from sources inside and outside the jurisdiction to fund housing improvements, community facilities and services, and business opportunities in neighborhoods in need of revitalization. When a community is being revitalized, the preservation of affordable housing units can be a strategy to promote integration.

Lack of local private fair housing outreach and enforcement
The term "local private fair housing outreach and enforcement" refers to outreach and enforcement actions by private individuals and organizations, including such actions as fair housing education, conducting testing, bring lawsuits, arranging and implementing settlement agreements. A lack of private enforcement is often the result of a lack of resources or a lack of awareness about rights under fair housing and civil rights laws, which can lead to under-reporting of discrimination, failure to take advantage of remedies under the law, and the continuation of discriminatory practices. Activities to raise awareness may include technical training for housing industry representatives and organizations, education and outreach activities geared to the general public, advocacy campaigns, fair housing testing and enforcement.

Lack of local public fair housing enforcement
The term "local public fair housing enforcement" refers here to enforcement actions by State and local agencies or non-profits charged with enforcing fair housing laws, including testing, lawsuits, settlements, and fair housing audits. A lack of enforcement is a failure to enforce existing requirements under state or local fair housing laws. This may be assessed by reference to the nature, extent, and disposition of housing discrimination complaints filed in the jurisdiction.

Lack of private investment in specific neighborhoods
The term "private investment" refers here to investment by non-governmental entities, such as

corporations, financial institutions, individuals, philanthropies, and non-profits, in housing and community development infrastructure~~, such as housing construction or rehabilitation, investment in businesses, and the creation of community amenities, such as recreational and social service facilities. Disparities in private investment can have an impact on fair housing choice and the quality of communities.~~. Private investment can be used as a tool to advance fair housing, through innovative strategies such as mixed-use developments ~~and public-private partnerships. However, disparities in patterns of private investment can also undermine fair housing by perpetuating housing segregation, R/ECAPs, disparity in access to opportunity, and disproportionate housing needs~~, targeted investment, and public-private partnerships. Private investments may include, but are not limited to: housing construction or rehabilitation; investment in businesses; the creation of community amenities, such as recreational facilities and providing social services; and economic development of the neighborhoods that creates jobs and increase access to amenities such as grocery stores, pharmacies, and banks. It should be noted that investment solely in housing construction or rehabilitation in areas that lack other types of investment may perpetuate fair housing issues. While "private investment" may include many types of investment, to achieve fair housing outcomes such investments should be strategic and part of a comprehensive community development strategy.

Lack of public investment in specific neighborhoods, including services or amenities
The term "public investment" refers here to the money government spends on housing and community development, including public facilities, infrastructure, services. Services and amenities refer to services and amenities provided by local or state governments. These services often include sanitation, water, streets, schools, emergency services, social services, parks and transportation. Lack of or disparities in the provision of municipal and state services and amenities have an impact on housing choice and the quality of communities. Inequalities can include, but are not limited to disparity in physical infrastructure (such as whether or not roads are paved or sidewalks are provided and kept up); differences in access to water or sewer lines, trash pickup, or snow plowing. Amenities can include, but are not limited to recreational facilities, libraries, and parks. Variance in the comparative quality and array of municipal and state services across neighborhoods impacts fair housing choice.

Lack of regional cooperation
The term "regional cooperation" refers here to formal networks or coalitions of organizations, people, and entities working together to plan for regional development. Cooperation in regional planning can be a useful approach to coordinate responses to identified fair housing issues and contributing factors because fair housing issues and contributing factors not only cross multiple sectors—including housing, education, transportation, and commercial and economic development—but these issues are often not constrained by political-geographic boundaries. When there are regional patterns in segregation or R/ECAP, access to opportunity, disproportionate housing needs, or the concentration of affordable housing there may be a lack of regional cooperation and fair housing choice may be restricted.

Lack of resources for fair housing agencies and organizations
A lack of resources refers to insufficient resources for public or private organizations to conduct fair housing activities including testing, enforcement, coordination, advocacy, and awareness-raising. Fair housing testing has been particularly effective in advancing fair housing, but is rarely used today because of costs. Testing refers to the use of individuals who, without any bona fide intent to rent or purchase a home, apartment, or other dwelling, pose as prospective buyers or renters of real estate for the purpose of gathering information which may indicate whether a housing provider is complying with fair housing laws. "Resources" as used in this factor can be either public or private funding or other resources. Consider also coordination mechanisms between different enforcement actors.

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Lack of state or local fair housing laws
State and local fair housing laws are important to fair housing outcomes. Consider laws that are comparable or "substantially equivalent" to the Fair Housing Act or other relevant federal laws affecting fair housing laws, as well as those that include additional protections. Examples of state and local laws affecting fair housing include legislation banning source of income discrimination, protections for individuals based on sexual orientation, age, survivors of domestic violence, or other characteristics, mandates to construct affordable housing, and site selection policies. Also consider changes to existing State or local fair housing laws, including the proposed repeal or dilution of such legislation.

Land use and zoning laws
The term "land use and zoning laws" generally refers to regulation by State or local government of the use of land and buildings, including regulation of the types of activities that may be conducted, the density at which those activities may be performed, and the size, shape and location of buildings and other structures or amenities. Zoning and land use laws affect housing choice by determining where housing is built, what type of housing is built, who can live in that housing, and the cost and accessibility of the housing. Examples of such laws and policies include, but are not limited to:

- Limits on multi-unit developments, which may include outright bans on multi-unit developments or indirect limits such as height limits and minimum parking requirements.
- Minimum lot sizes, which require residences to be located on a certain minimum sized area of land.
- Occupancy restrictions, which regulate how many persons may occupy a property and, sometimes, the relationship between those persons (refer also to occupancy codes and restrictions for further information).
- Inclusionary zoning practices that mandate or incentivize the creation of affordable units.
- Requirements for special use permits for all multifamily properties or multifamily properties serving individuals with disabilities.
- Growth management ordinances.

Lending Discrimination
The term "lending discrimination" refers here to unequal treatment based on protected class in the receipt of financial services and in residential real estate related transactions. These services and transactions encompass a broad range of transactions, including but not limited to: the making or purchasing of loans or other financial assistance for purchasing, constructing, improving, repairing, or maintaining a dwelling, as well as the selling, brokering, or appraising or residential real estate property. Discrimination in these transaction includes, but is not limited to: refusal to make a mortgage loan or refinance a mortgage loan; refusal to provide information regarding loans or providing unequal information; imposing different terms or conditions on a loan, such as different interest rates, points, or fees; discriminating in appraising property; refusal to purchase a loan or set different terms or conditions for purchasing a loan; discrimination in providing other financial assistance for purchasing, constructing, improving, repairing, or maintaining a dwelling or other financial assistance secured by residential real estate; and discrimination in foreclosures and the maintenance of real estate owned properties.

Location of accessible housing
The location of accessible housing can limit fair housing choice for individuals with disabilities. For purposes of this assessment, accessible housing refers to housing opportunities in which individuals with disabilities have equal opportunity to use and enjoy a dwelling. Characteristics that affect accessibility may include physical accessibility of units and public and common use areas of housing, as well as application procedures, such as first come first serve waitlists, inaccessible websites or other technology, denial of access to individuals with assistance animals, or lack of information about affordable accessible

housing. Federal, state, and local laws apply different accessibility requirements to housing. Generally speaking, multifamily housing built in 1991 or later must have accessibility features in units and in public and common use areas for persons with disabilities in accordance with the requirements of the Fair Housing Act. Housing built by recipients of Federal financial assistance or by, on behalf of, or through programs of public entities must have accessibility features in units and in public and common use areas, but the level of accessibility required may differ depending on when the housing was constructed or altered. Single family housing is generally not required to be accessible by Federal law, except accessibility requirements typically apply to housing constructed or operated by a recipient of Federal financial assistance or a public entity. State and local laws differ regarding accessibility requirements. An approximation that may be useful in this assessment is that buildings built before 1992 tend not to be accessible.

Location of employers
The geographic relationship of job centers and large employers to housing, and the linkages between the two (including, in particular, public transportation) are important components of fair housing choice. Include consideration of the type of jobs available, variety of jobs available, job training opportunities, benefits and other key aspects that affect job access.

Location of environmental health hazards
The geographic relationship of environmental health hazards to housing is an important component of fair housing choice. When environmental health hazards are concentrated in particular areas, neighborhood health and safety may be compromised and patterns of segregation entrenched. Relevant factors to consider include the type and number of hazards, the degree of concentration or dispersion, and health effects such as asthma, cancer clusters, obesity, etc. Additionally, industrial siting policies and incentives for the location of housing may be relevant to this factor.

Location of proficient schools and school assignment policies
The geographic relationship of proficient schools to housing, and the policies that govern attendance, are important components of fair housing choice. The quality of schools is often a major factor in deciding where to live and school quality is also a key component of economic mobility.   Relevant factors to consider include whether proficient schools are clustered in a portion of the jurisdiction or region, the range of housing opportunities close to proficient schools, and whether the jurisdiction has policies that enable students to attend a school of choice regardless of place of residence. Policies to consider include, but are not limited to: inter-district transfer programs, limits on how many students from other areas a particular school will accept, and enrollment lotteries that do not provide access for the majority of children.

Location and type of affordable housing
Affordable housing includes, but is not limited to publicly supported housing; however each category of publicly supported housing often serves different income-eligible populations at different levels of affordability. What is "affordable" varies by circumstance, but an often used rule of thumb is that a low- or moderate-income family can afford to rent or buy a decent-quality dwelling without spending more than 30 percent of its income. The location of housing encompasses the current location as well as past siting decisions. The location of affordable housing can limit fair housing choice, especially if the housing is located in segregated areas, R/ECAPs, or areas that lack access to opportunity. The type of housing (whether the housing primarily serves families with children, elderly persons, or persons with disabilities) can also limit housing choice, especially if certain types of affordable housing are located in segregated areas, R/ECAPs, or areas that lack access to opportunity, while other types of affordable housing are not. The provision of affordable housing is often important to individuals with protected characteristics because they are disproportionately represented among those that would benefit from low-cost housing.

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Occupancy codes and restrictions

The term "occupancy codes and restrictions" refers here to State and local laws, ordinances, and regulations that regulate who may occupy a property and, sometimes, the relationship between those persons. Standards for occupancy of dwellings and the implication of those standards for persons with certain protected characteristics may affect fair housing choice. Occupancy codes and restrictions include, but are not limited to:

- Occupancy codes with "persons per square foot" standards.
- Occupancy codes with "bedrooms per persons" standards.
- Restrictions on number of unrelated individuals in a definition of "family."
- Restrictions on occupancy to one family in single family housing along with a restricted definition of "family."
- Restrictions that directly or indirectly affect occupancy based on national origin, religion, or any other protected characteristic.
- Restrictions on where voucher holders can live.

Private Discrimination

The term "private discrimination" refers here to discrimination in the private housing market that is illegal under the Fair Housing Act or related civil rights statutes. This may include, but is not limited to, discrimination by landlords, property managers, home sellers, real estate agents, lenders, homeowners' associations, and condominium boards. Some examples of private discrimination include:

- Refusal of housing providers to rent to individuals because of a protected characteristic.
- The provision of disparate terms, conditions, or information related to the sale or rental of a dwelling to individuals with protected characteristics.
- Steering of individuals with protected characteristics by a real estate agent to a particular neighborhood or area at the exclusion of other areas.
- Failure to grant a reasonable accommodation or modification to persons with disabilities.
- Prohibitions, restrictions, or limitations on the presence or activities of children within or around a dwelling.

Useful references for the extent of private discrimination may be number and nature of complaints filed against housing providers in the jurisdiction, testing evidence, and unresolved violations of fair housing and civil rights laws.

Quality of affordable housing information programs

The term "affordable housing information programs" refers here to the provision of information related to affordable housing to potential tenants and organizations that serve potential tenants, including the maintenance, updating, and distribution of the information. This information includes, but is not limited to, listings of affordable housing opportunities or local landlords who accept Housing Choice Vouchers; mobility counseling programs; and community outreach to potential beneficiaries. The quality of such information relates to, but is not limited to:

- How comprehensive the information is (e.g. that the information provided includes a variety of neighborhoods, including those with access to opportunity indicators)
- How up-to-date the information is (e.g. that the publicly supported housing entity is taking active steps to maintain, update and improve the information).
- Pro-active outreach to widen the pool of participating rental housing providers, including both owners of individual residences and larger rental management companies.

Regulatory barriers to providing housing and supportive services for persons with disabilities
Some local governments require special use permits for or place other restrictions on housing and supportive services for persons with disabilities, as opposed to allowing these uses as of right. These requirements sometimes apply to all groups of unrelated individuals living together or to some subset of unrelated individuals. Such restrictions may include, but are not limited to, dispersion requirements or limits on the number of individuals residing together. Because special use permits require specific approval by local bodies, they can enable community opposition to housing for persons with disabilities and lead to difficulty constructing this type of units in areas of opportunity or anywhere at all. Other restrictions that limit fair housing choice include requirements that life-safety features appropriate for large institutional settings be installed in housing where supportive services are provided to one or more individuals with disabilities. Note that the Fair Housing Act makes it unlawful to utilize land use policies or actions that treat groups of persons with disabilities less favorably than groups of persons without disabilities, to take action against, or deny a permit, for a home because of the disability of individuals who live or would live there, or to refuse to make reasonable accommodations in land use and zoning policies and procedures where such accommodations may be necessary to afford persons or groups of persons with disabilities an equal opportunity to use and enjoy housing.

Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
The term "siting selection" refers here to the placement of new ~~or rehabilitated~~ publicly supported housing developments. Placement of new housing refers to new construction or acquisition with rehabilitation of previously unsubsidized housing. State and local policies, practices, and decisions can significantly affect the location of new ~~or rehabilitated~~ publicly supported housing. Local policies, practices, and decisions that may influence where developments are sited include, but are not limited to, local funding approval processes, zoning and land use laws, local approval of LIHTC applications, and donations of land and other municipal contributions. For example, for LIHTC developments, the priorities and requirements set out in the governing Qualified Allocation Plan (QAP) influence where developments are located through significant provisions in QAPs such as local veto or support requirements and criteria and points awarded for project location.

Source of income discrimination
The term "source of income discrimination" refers here to the refusal by a housing provider to accept tenants based on type of income. This type of discrimination often occurs against individuals receiving assistance payments such as Supplemental Security Income (SSI) or other disability income, social security or other retirement income, or tenant-based rental assistance~~. While not directly prohibited by the Fair~~, including Housing ~~Act, this type~~Choice Vouchers. Source of income discrimination may significantly limit fair housing choice for individuals with certain protected characteristics. ~~A number~~The elimination of ~~jurisdictions have passed local laws prohibiting~~ source of income discrimination~~, which is one way to open~~ and the acceptance of payment for housing ~~options that increase~~, regardless of source or type of income, increases fair housing choice and access to opportunity.

State or local laws, policies, or practices that discourage individuals with disabilities from being placed in or living in apartments, family homes, and other integrated settings
State and local laws, policies, or practices may discourage individuals with disabilities from moving to or being placed in integrated settings. Such laws, policies, or practices may include medical assistance or social service programs that require individuals to reside in institutional or other segregated settings in order to receive services, a lack of supportive services or affordable, accessible housing, or a lack of access to transportation, education, or jobs that would enable persons with disabilities to live in integrated, community-based settings.

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Unresolved violations of fair housing or civil rights law

Unresolved violations of fair housing and civil rights laws include determinations or adjudications of a violation or relevant laws that have not been settled or remedied. This includes determinations of housing discrimination by an agency, court, or Administrative Law Judge ~~and~~; findings of noncompliance by HUD or state or local agencies~~.~~

Assessment of Fair Housing (AFH) Instructions

Introduction

Program participants conducting an assessment of ; and noncompliance with fair housing as required under the affirmatively furthering fair housing rule, published at [INSERT PUBLICATION CITATION], are required to complete and submit this Assessment Tool. These instructions are for the Assessment Tool designed for use by non-state entitlement jurisdictions and non-state entitlement jurisdictions public housing agencies that are jointly submitting their AFH.

To complete the Assessment Tool, program participants must use local data and local knowledge that meets the criteria outlined below in addition to the HUD-provided maps and tables. Local data and local knowledge can be particularly helpful when the program participant has local data that are more up-to-date or more accurate than the HUD-provided data or when the HUD-provided data do not cover all of the protected classes that would be relevant to the program participant's analysis. HUD is only able to provide data for those protected class groups for which nationally uniform data are available. For this reason, some questions focus on specific protected classes based on the availability of such data. For those questions, local data and local knowledge may provide information to supplement the analysis for protected classes not covered by the HUD-provided data.

Local data is defined in the Final Rule at § 5.152, and refers to metrics, statistics, and other quantified information, subject to a determination of statistical validity by HUD, that are relevant to the program participant's geographic areas of analysis, can be found through a reasonable amount of searching, are readily available at little or no cost, and are necessary for the completion of the AFH using the Assessment Tool. Examples of local data include relevant demographic data or program-related data maintained by the program participant, another public agency, or another entity that are readily available and easily accessible to the program participant at little or no cost. Program participants must use reasonable judgment in deciding what supplemental information from among the numerous sources available would be most relevant to their analysis. HUD does not expect program participants to hire statisticians or other consultants to locate and analyze all possible sources of local data. Note that, subject to the community participation, consultation and coordination process outlined in the Final Rule at § 5.158, the program participant is required to consider information relevant to the jurisdiction or region submitted during the community participation process, including recommendations of other data sources for the program participant to assess.

Local knowledge is defined in the Final Rule at § 5.152, and means information to be provided by the program participant that relates to the program participant's geographic areas of analysis and that is relevant to the program participant's AFH, is known or becomes known to the program participant, and is necessary for the completion of the AFH using the Assessment Tool. Examples of local knowledge include laws and policies, common neighborhood names and borders, and information about the housing market and housing stock. HUD does not expect the program participant to review every possible source to search out local knowledge. However, local knowledge includes information obtained through the community participation process. Program participants are required to consider the information received during the community participation process as they conduct an AFH using the Assessment Tool.

Part I: Cover Sheet with Certification

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Complete the cover sheet with all requested information. The official authorized representative of each program participant must sign and date the certification.

Part II: Executive Summary

To complete the Executive Summary, refer to fair housing contributing factors, issues and goals identified in parts IV and V of the Assessment Tool, as well as goals identified in the most recent previous Analyses of Impediments to Fair Housing Choice or Assessments of Fair Housing.

Part III: Community Participation Process

Complete all three questions based on the community participation, consultation and coordination process outlined in the Final Rule at § 5.158. In question (3), pursuant to § 5.154(d)(5), the program participant must include an explanation for why any comments or views submitted through the community participation process were not accepted—note that this includes information, such as supplemental data and reports.

Part IV: Assessment of Past Goals and Actions

1. For question (1)(a), provide an explanation of what past goals were selected by the program participant and what progress has been made toward their achievement. Use the metrics and milestones identified in past Analyses of Impediments or past Assessments of Fair Housing in assessing progress.

To answer question (1)(b), explain how the past goals selected influenced the selection of current goals.

For question (1)(c), the program participant may provide any additional information about policies, actions, or steps that address fair housing issues in the program participant's geographic area of analysis.

Part V: Analysis

For all questions, program participants must use the HUD-provided data and supplement that information with local data and local knowledge when it meets the criteria under § 5.152 (described above). HUD-provided maps are located in Appendix A and HUD-provided tables are located in Appendix B.

Where HUD has not provided data for a specific question in the Assessment Tool and the program participant does not have local data or local knowledge that would assist in answering the question, program participants are expected to note this rather than leaving the question blank.

A. Demographic Summary

For question (1), refer to Tables 1 and 2, which present demographic summary data for the jurisdiction and region.

B. Fair Housing Issue Analysis
Segregation/Integration

OPTION B

1. For questions (1)(a) and (1)(b), refer to Table 3. Table 3 presents the dissimilarity index for the jurisdiction and region for white/non-white, black/white, Hispanic/white, and Asian/white populations for multiple census years.

This dissimilarity index measures the degree to which two groups are evenly distributed across a geographic area and is commonly used for assessing residential segregation between two groups. Values range from 0 to 100, where higher numbers indicate a higher degree of segregation among the two groups measured.

Dissimilarity index values between 0 and 39 generally indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation. However, context is important in interpreting the dissimilarity index. The index does not indicate spatial patterns of segregation, just the relative degree of segregation; and, for populations that are small in absolute numbers, the dissimilarity index may be high even if the group's members are evenly distributed throughout the area. Generally, when a group's population is less than 1,000, program participants should exercise caution in interpreting associated dissimilarity indices. Also, because the index measures only two groups at a time, it is less reliable as a measure of segregation in areas with multiple demographic groups.

For question 1(a) indicate whether the measures shown generally indicate that segregation in the jurisdiction and region is low, moderate or high for each racial/ethnic group represented in Table 3, and note which groups experience the highest levels of segregation.

For question 1(b), refer to Table 4, which provides dissimilarity index values for 1990, 2000, and 2010. Note whether the dissimilarity index values have increased or decreased over time. Increasing values may indicate increasing segregation, and decreasing values may indicate decreasing segregation.

For questions (1)(c) , refer to Maps 1, 3, and 4. Maps 1, 3, and 4 are dot density maps showing the residential distribution of racial/ethnic, national origin, and limited English proficient (LEP) populations in the jurisdiction and region. A dot density map (also known as dot distribution map) uses a color-coded dot symbols representing the presence of a specified number of individuals sharing a particular characteristic to show a spatial pattern. The presence of residential segregation may appear as clusters of a single color of dots representing one protected class, or as clusters of more than one color of dots representing a number of protected classes but still excluding one or more protected classes. More integrated areas will appear as a variety of colored dots.

While dot density maps are useful in demonstrating residential patterns, they also have limitations. Dot placement does not represent actual addresses – rather individual dots are randomly located within a particular census block to match aggregate population totals for that block group. Note also that the data provided for national origin is based on census data for the 5 most populous "foreign born" populations by country of origin, however, some jurisdictions may have other significant populations not included in the HUD-provided data but reflected in local data or local knowledge. In addition, the "foreign born" population does not track exactly with the definition of national origin under the Fair Housing Act, which includes place of birth as well as place of ancestor's birth. LEP data shows residential segregation by language for speakers of the five most populous limited English proficient groups in the jurisdiction and region. Again, some jurisdictions may have other significant populations not included in the HUD-provided data but reflected in local data or local knowledge.

For question (1)(c), refer to Maps 1, 3, and 4 to identify areas on the map that reveal clusters of race/ethnicity, national origin, or LEP groups, and areas where the map indicates are particularly integrated. In identifying those areas, and all areas throughout the tool, use commonly used neighborhood or area names.

For question (1)(d) refer to Maps 1, 2, 3, and 4, and Tables 1 and 2. Map 2 depicts racial/ethnic dot density distribution for previous years (1990 and 2000). A comparison of the patterns shown in Map 2 to the patterns shown in Map 1 may reveal changes in patterns of segregation by race/ethnicity over time. For instance, the comparison may show that an area previously occupied predominantly by one racial/ethnic group is now more integrated. Consider these changes in conjunction with Tables 1 and 2 showing changes in overall demographics over time, as well as local knowledge about local policies, practices, trends, and investments to answer question 1(e). Consider also Maps 3 and 4 which depict dot density distribution of national origin and LEP populations.

2. Understanding the limitations of the HUD-provided data discussed above, complete question (2)(a). The Fair Housing Act protects individuals on the basis of race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability. HUD has provided data for this section only on race/ethnicity and national origin. Include any relevant information about other protected characteristics – but note that the analysis of disability is specifically considered in Section V(D). Program participants may include relevant information relating to persons with disabilities here, but still must address the questions in Section V(D).

3. For question (3), consider the list of contributing factors provided and identify those factors that significantly impact segregation. Under "other," supplement the list with any other significant contributing factors not included on the list. An explanation of each contributing factor can be found in Appendix C.

Contributing factors may be outside the ability of the program participant to directly control or influence; however, such factors, if relevant to the jurisdiction and region, must be identified and prioritized. In such cases, there still may be policy options or goals that a program participant should identify, while recognizing the limitations involved.

For program participants submitting jointly, each program participant is responsible for identifying contributing factors within its jurisdiction. These factors will be prioritized in Section VI and used as a basis for establishing goals.

R/ECAPs

1. For question (1)(a), refer to Maps 1, 3 and 4, which include outlined census tracts that meet the threshold criteria for racially or ethnically concentrated areas of poverty (R/ECAPs). The area within the outline meets the definition of an R/ECAP, as set forth in the rule at § 5.152.

To answer question (1)(b), use Maps 1, 3, and 4 and Table 6. Maps 1, 3, and 4 are dot density maps showing the residential distribution of racial/ethnic, national origin, and limited English proficient (LEP) populations in the jurisdiction and region. These maps also include outlined overlays of R/ECAPs. The presence of residential segregation in R/ECAPs may appear as clusters of a single color of dots representing one protected class, or as clusters of more than one color of dots representing a number of protected classes but still excluding one or more protected classes. More integrated areas will appear as a variety of colored dots. Table 6 shows the percentage of persons living in R/ECAPS with certain protected characteristics (race/ethnicity, families with

children, national origin) in the jurisdiction and the region. Note that the percentages reflect the proportion of the total population living in R/ECAPs that has a protected characteristic, not the proportion of that individuals with a protected characteristic living in R/ECAPs . Table 6 can be compared to Table 1, which shows the total population in the jurisdiction and region for each of the groups shown in Table 6.

To answer question (1)(c), refer to Maps 1, 2, 3, and 4. Map 1 shows the outlines of current R/ECAPs. Map 2 shows the outlines of R/ECAPs in past years (1990 and 2000). Compare the current R/ECAP outlines with previous R/ECAP outlines and describe whether R/ECAPs have remained constant, whether new R/ECAPs have emerged, or whether certain R/ECAPs no longer exist. Maps 1, 2, 3 and 4 also show dot density distributions by race/ethnicity, national origin and LEP, including R/ECAP outlines. Note whether the maps show any changes over time in the groups most affected by R/ECAPS.

2. Understanding the limitations of the HUD-provided data discussed above, complete question (2)(a). The Fair Housing Act protects individuals on the basis of race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability. HUD has provided data for this section only on race/ethnicity and national origin. Include any relevant information about other protected characteristics, but note that the analysis of disability is specifically considered in Section V(D). Program participants may include relevant information relating to persons with disabilities here, but still must address the questions in Section V(D).

3. For question (3), consider the list of contributing factors provided and identify those factors that significantly impact R/ECAPs. Under "other," supplement the list with any other significant contributing factors not included on the list. An explanation of each contributing factor can be found in Appendix C.

Contributing factors may be outside the ability of the program participant to directly control or influence; however, such factors, if relevant to the jurisdiction and region, must be identified and prioritized. In such cases, there still may be policy options or goals that a program participant should identify, while recognizing the limitations involved.

For program participants submitting jointly, each program participant is responsible for identifying contributing factors within its jurisdiction. These factors will be prioritized in Section VI and used as a basis for establishing goals.

Disparities in Access to Opportunity

1. For question (1), refer to Table 14. Table 14 provides index scores or values for the following opportunity indicator indices: Low Poverty; School Proficiency; Labor Market; Jobs Proximity; Low Transportation Costs; Transit Index; and Environmental Health. A higher score on each of the indices would indicate: lower neighborhood poverty rates; higher levels of school proficiency; higher levels of labor engagement; closer proximity to jobs; lower transportation costs; closer access to public transportation; and greater neighborhood environmental quality (i.e., lower exposure rates to harmful toxins).

For the questions in (1)(a), use the School Proficiency Index in Table 14 and refer to Map 9. The School Proficiency Index measures the percentage of individuals sharing a protected characteristic who live within the attendance area (where this information is available) or within one mile of a proficient elementary school. The values for the School Proficiency Index are determined by the performance of students on state exams. Map 9 consists of three sub-maps, showing the spatial

distribution of racial/ethnic and national origin groups and families with children overlaid by shading that shows school proficiency levels for the jurisdiction and the region. The maps also include R/ECAP outlines. To answer the question, examine the School Proficiency Index, by race/ethnicity, and Map 9, by race/ethnicity, national origin, and family status, to identify differences in access to proficient schools by protected characteristic. Note that, to the extent the question requires consideration of local policies and practices, local knowledge (as defined at § 5.152) will be relevant.

For question (1)(b), refer to the Jobs Proximity Index and Labor Market Index in Table 14, and to Maps 10 and 11. The Jobs Proximity Index measures the physical distances between place of residence and jobs by race/ethnicity. The Labor Market Index provides a measure of unemployment rate, labor-force participation rate, and percent of the population ages 25 and above with at least a bachelor's degree, by neighborhood. Map 10 shows residency patterns of racial/ethnic and national origin groups and families with children overlaid by shading that shows the jobs proximity measure for the jurisdiction and the region. The map also includes R/ECAP outlines. Map 11 shows residency patterns of racial/ethnic and national origin groups and families with children overlaid by shading that shows labor engagement for the jurisdiction and the region. The map also includes R/ECAP outlines. To answer the question, examine the indices' values by race/ethnicity, and Maps 10 and 11, by race/ethnicity, national origin, and family status, to identify differences in proximity to jobs and labor market engagement by protected characteristic.

For the questions in (1)(c), refer to Table 14 (Transportation Cost Index[13] and the Transit Index) and Map 12. The transportation cost index measures cost of transport and proximity to public transportation by neighborhood. The Transit Index measures how often low-income families in a neighborhood use public transportation. Map 12 shows residency patterns of racial/ethnic and national origin groups and families with children overlaid by shading that shows transportation access at the neighborhood level. Separate maps are included for the jurisdiction and the region. These maps also include R/ECAP outlines. To answer the question, examine the Transportation Cost Index and Transit Index values, by race/ethnicity, and Map 12 , by race/ethnicity, national origin, and family status, to identify differences in access to transportation by protected characteristic.

For question (1)(d), refer to the Low Poverty Index in Table 14 and Map 13. The Low Poverty Index uses rates of family poverty by household (based on the federal poverty line) and receipt of public assistance[14] to measure exposure to poverty by neighborhood. A higher score generally indicates less exposure to poverty at the neighborhood level. Map 13 shows residency patterns of racial/ethnic and national origin groups and families with children overlaid by shading that depicts poverty levels for the jurisdiction and the region. The map also includes R/ECAP outlines. To answer the question, examine the Low Poverty Index values, by race/ethnicity, and Map 13, by race/ethnicity, national origin, and family status, to identify differences in poverty by protected characteristic.

For question (1)(e), refer to the Environmental Health Index in Table 14 and Map 14. The Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory and neurological toxins by neighborhood. Map 14 shows residency patterns of racial/ethnic and national origin groups and families with children overlaid by shading

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[13] Please note there is no corresponding map for the Transportation Cost Index. HUD anticipates a map may be provided in later releases of the Data Tool.

[14] Public assistance is cash-welfare, such as Temporary Assistance for Needy Families (TANF).

showing the level of exposure to environmental health hazards for the jurisdiction and the region. The map also includes R/ECAP outlines. To answer the question, examine the Environmental Health Index values, by race/ethnicity, and Map 14, by race/ethnicity, national origin, and family status, to identify differences in exposure to environmental health hazards by protected characteristic.

For question (1)(f), refer to the answers provided in question (1)(a) – (e).

2. Understanding the limitations of the HUD-provided data discussed above, complete question (2)(a). The Fair Housing Act protects individuals on the basis of race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability. HUD has provided data for this section only on race/ethnicity, national origin, and family status. Include any relevant information about other protected characteristics, but note that the analysis of disability is specifically considered in Section V(D). Program participants may include relevant information relating to persons with disabilities here, but still must address the questions in Section V(D).

3. For question (3), consider the list of contributing factors provided and identify those factors that significantly impact access to opportunity. Under "other," supplement the list with any other significant contributing factors not included on the list. An explanation of each contributing factor can be found in Appendix C.

Contributing factors may be outside the ability of the program participant to directly control or influence; however, such factors, if relevant to the jurisdiction and region, must be identified and prioritized. In such cases, there still may be policy options or goals that a program participant should identify, while recognizing the limitations involved.

For program participants submitting jointly, each program participant is responsible for identifying contributing factors within its jurisdiction. These factors will be prioritized in Section VI and used as a basis for establishing goals.

Disproportionate Housing Needs

1. For question (1)(a), refer to Tables 10 and 11. Table 10 shows the percentage of race/ethnicity groups and families with children experiencing two potential categories of housing need. The first category is households experiencing one of four housing problems: housing cost burden (defined as paying more than 30% of income for monthly housing costs including utilities), overcrowding, lacking a complete kitchen, or lacking plumbing. The second category is households experiencing "one of four severe housing problems" which are: severe housing cost burden (defined as paying more than half of one's income for monthly housing costs including utilities), overcrowding, and lacking a complete kitchen, or lacking plumbing . Table 11 shows the number of persons by race/ethnicity and family size experiencing severe housing cost burden.

For question (1)(b), refer to Maps 7 and 8. Map 7 shows the residential living patterns for persons by race/ethnicity, overlaid by shading indicating the percentage of households experiencing one or more housing problems. Darker shading indicates a higher prevalence of such problems. The map also includes R/ECAP outlines. Map 8 shows the same information overlaid on residential living patterns by national origin.

For question (1)(c), refer to Table 12. Table 12 shows housing needs experienced by families with 5 or more persons (used to approximate the population of families with children). Table 12 shows the number of households occupying units of various sizes (0-1 bedrooms, 2 bedrooms, 3 or more

bedrooms) in four publicly supported housing program categories (public housing, Project-based Section 8, Other HUD Multifamily, and HCV). Table 12 shows the number of households with children currently residing in each of those four program categories.

2. Understanding the limitations of the HUD-provided data discussed above, complete question (2). The Fair Housing Act protects individuals on the basis of race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability. HUD has provided data for this section only on race/ethnicity, national origin, and family status. Include any relevant information about other protected characteristics, but note that the analysis of disability is specifically considered in Section V(D). Program participants may include any relevant information relating to persons with disabilities here, but still must address the questions in Section V(D).

3. For question (3), consider the list of contributing factors provided and identify those factors that significantly impact disproportionate housing needs. Under "other," supplement the list with any other significant contributing factors not included on the list. An explanation of each contributing factor can be found in Appendix C.

Contributing factors may be outside the ability of the program participant to directly control or influence; however, such factors, if relevant to the jurisdiction and region, must be identified and prioritized. In such cases, there still may be policy options or goals that a program participant should identify, while recognizing the limitations involved.

For program participants submitting jointly, each program participant is responsible for identifying contributing factors within its jurisdiction. These factors will be prioritized in Section VI and used as a basis for establishing goals.

C. Publicly Supported Housing[15] Analysis

1. For question (1), data on publicly supported housing is grouped into five program categories: public housing; project-based Section 8; Section 8 tenant-based Housing Choice Vouchers (HCV); Other HUD Multifamily housing (including Section 202 Supportive Housing for the Elderly and Section 811Supportive Housing for Persons with Disabilities); and Low-Income Housing Tax Credit (LIHTC) housing. Some tables and maps provided include information on some of the program categories but not others based on availability of the data. Note that other publicly supported housing programs, for instance those funded through state and local programs or by other federal agencies, such as USDA's Rural Housing Service and the Veteran's Administration, or other HUD programs that are not covered in the HUD-provided data may be relevant to the analysis.

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[15] The term "publicly supported housing" refers to housing assisted, subsidized, or financed with funding through Federal, State, or local agencies or programs as well as housing that is financed or administered by or through any such agencies or programs. HUD is currently providing data on five specific categories of housing: Public Housing; Project-Based Section 8; other HUD multifamily housing (including Section 202 – Supportive Housing for the Elderly, Section 811 – Supportive Housing for Persons with Disabilities, and other multifamily assisted properties); Low Income Housing Tax Credit (LIHTC) housing; and Housing Choice Vouchers (HCV). Other publicly supported housing relevant to the analysis includes housing funded through state and local programs, other federal agencies, such as USDA and VA, or other HUD-funded housing not captured in the five categories listed above.

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For questions (1)(a)(i) and (ii), refer to Tables 7 and 8. Tables 7 and 8 present data by race/ethnicity for persons occupying four categories of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily, and HCV) in the jurisdiction. The tables also provide race/ethnicity data for the total population in the jurisdiction and for persons meeting the income eligibility requirements[16] for a relevant category of publicly supported housing.

For questions (1)(b)(i) and (ii) refer to Maps 5 and 6, which are race/ethnicity dot density maps with a publicly supported housing overlay, including outlines of R/ECAPS. In Map 5, symbols representing four categories of publicly supported housing indicate the location of a development of that category of housing. Note that some developments may represent multiple buildings or projects that are not necessarily located at the same address the symbol represents. In Map 6, the density of use of Section 8 vouchers is layered over a race/ethnicity dot density map. Darker shading represents a heavier concentration of vouchers. Map 5 does not distinguish between developments that serve families, elderly, or persons with disabilities; however, projects serving these populations are often affected differently by laws, policies and practices, resulting in significantly different siting patterns. Local knowledge may be particularly useful in answering this portion of the question.

For question (1)(b)(iii), use Table 9, which shows the percentage of occupants in four publicly supported housing program categories (public housing, project-based Section 8, Other HUD Multifamily, and HCV) in units located either within R/ECAPs or outside of R/ECAPs. The table also breaks out this information by race/ethnicity, elderly and disability status. To answer the question, compare the percentage of occupants sharing a protected characteristic living in units located in R/ECAPS to the percentage of occupants sharing the same protected characteristic living in units outside of R/ECAPS.

For question (1)(b)(iv)(A), refer to both the HUD-provided data and local data and local knowledge. Table 10 shows the racial/ethnic composition and percentage of households with children occupying public housing. Local data and local knowledge may be informative for both properties converted under the Rental Assistance Demonstration (RAD) and for LIHTC developments.

Compare the demographic occupancy data of developments to other developments of the same category. In analyzing this table, be aware that the reliability and utility of the demographic occupancy information is affected by the size of the development — smaller developments may appear to have greater variance, but because of the small size of the development the variance may not be statistically significant.

For question (1)(b)(iv)(B), Table 10 is provided for program participants' use, however local data and local knowledge, including information obtained through the community participation process, may be particularly useful in answering this portion of the question.

For question (1)(b)(v), refer to Table 10, which also shows the racial/ethnic composition of the census tract[17] in which each development is located. Note that census tract boundaries may not align with "neighborhoods" or "areas" as commonly conceived, and (as with all questions in the

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[16] The Data Tool presents data for individuals earning 30% AMI. HUD anticipates adding additional income eligibility thresholds to account for other programs.

[17] Please note that Table 10 does not currently include census tract data. HUD anticipates adding this data before the final release of the Data Tool.

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Assessment Tool) program participants are encouraged to use local knowledge to assist in the comparison. Map 5, which shows the location of the publicly supported housing for the jurisdiction and region, may also be useful in conducting this analysis. Compare the demographic occupancy data of developments to the areas in which they are located.

For question (1)(c)(i), refer to the opportunity indicators analyzed in Section D, above and Maps 5 and 6, which are race/ethnicity dot density maps showing the locations of publicly supported housing developments (Map 5) and rates of Section 8 voucher utilization (Map 6) with R/ECAP outlines. Compare the locations of publicly supported housing to Maps 9 through 14, which depict the opportunity indicators. Note that while the location of housing may be relevant to analysis, it is not the only factor in analyzing disparities in access to opportunity. "Access" in this context encompasses consideration of infrastructure or policies related to where a person lives that impact an individual's ability to benefit from an opportunity, such as available transportation to a job, school enrollment policies, program eligibility criteria, or local labor laws. As noted above, Map 5 does not distinguish between developments that serve families, elderly, or persons with disabilities; however, projects serving these populations often reveal distinct patterns. Local knowledge may be particularly useful in answering this portion of the question.

2. Understanding the limitations of the HUD-provided data discussed above, complete question (2). The Fair Housing Act protects individuals on the basis of race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability. HUD has provided data for this section only on race/ethnicity, national origin, family status, and limited data on disability. Include any relevant information about other protected characteristics — but note that the analysis of disability is also specifically considered in Section V(D). Program participants may include an analysis of disability here, but still must include such analysis in Section V(D).

3. For question (3), consider the list of contributing factors provided and identify those factors that significantly impact the fair housing issues of segregation, R/ECAPs, access to opportunity and disproportionate housing needs in relation to publicly supported housing. Under "other," supplement the list with any other contributing factors not included on the list. An explanation of each contributing factor can be found in Appendix C.

Contributing factors may be outside the ability of the program participant to directly control or influence; however, such factors, if relevant to the jurisdiction and region, must be identified and prioritized. In such cases, there still may be policy options or goals that a program participant should identify, while recognizing the limitations involved.

For program participants submitting jointly, each program participant is responsible for identifying contributing factors within its jurisdiction. These factors will be prioritized in Section VI and used as a basis for establishing goals.

D. Disability and Access Analysis

1. For question (1)(a), refer to Map 15 and Table 15. Map 15 depicts a dot density distribution by disability type (hearing, vision, cognition, ambulatory, self-care, independent living) for the jurisdiction and the region. The map also includes R/ECAP outlines. Table 15 provides data on the percentage of the population with types of disabilities in the jurisdiction and the region.

For question (1)(b), refer to Maps 15 and 16 and Table 16. Map 16 depicts a dot density distribution of persons with disabilities by age (5-17, 18-64, and 65+) for the jurisdiction and the

region. Table 16 provides data on the percentage of the population with disabilities by age for the jurisdiction and the region.

2. For questions (2)(a) HUD is unable to provide data at this time, as there is limited nationally available disability-related data, including data relating to accessible housing; however, to answer these questions, program participants may refer to the maps provided by HUD to identify R/ECAPs or other segregated areas identified in previous sections above.

For questions (2)(b) HUD is unable to provide data at this time. Single family housing is generally not accessible to persons with disabilities unless state or local law requires it to be accessible or the housing is part of a multifamily housing project receiving Federal financial assistance from HUD. The Fair Housing Act requires that most multifamily properties built after 1991 meet federal accessibility standards. As a result, multifamily housing built after this date, if built in compliance with federal law would meet this minimum level of accessibility, while buildings built before this date generally would not be accessible. The age of housing stock can be a useful measure in answering this question. In addition, affordable housing subject to Section 504 of the Rehabilitation Act must include a percentage of units accessible for individuals with mobility impairments and units accessible for individuals with hearing or vision impairments. Map 5, which shows the location of four types of publicly supported housing, may also be useful in answering this question.

For question (2)(c), refer to Table 17. Table 17 provides data on the number and percentage of persons with disabilities residing in four categories of publicly supported housing in both the jurisdiction and the region. In answering the question, consider all policies and practices that impact individuals' ability to access the housing, including such things as wait list procedures, residency preferences, availability of different accessibility features, income targeting for new admissions, and website accessibility.

3. The Fair Housing Act, Section 504, and the ADA contain mandates related to integrated settings for persons with disabilities. Integrated settings are those that enable individuals with disabilities to live and interact with individuals without disabilities to the greatest extent possible and receive the healthcare and supportive services from the provider of their choice. To answer questions (3)(a) and (b), refer to HUD's "Statement of the Department of Housing and Urban Development on the Role of Housing in Accomplishing the Goals of *Olmstead*."[18]

4. For questions (4)(a) and (b), HUD is unable to provide data, as there is limited nationally available disability-related data.

5. Understanding the limitations of the HUD-provided data discussed above, complete question (5). The Fair Housing Act protects individuals on the basis of race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability. HUD has provided data for this section only on certain types of disabilities and for the ages of persons with disabilities. Include any relevant information about other protected characteristics.

6. For question (6), consider the list of contributing factors provided and identify those factors that significantly impact disability and access issues. Under "other," supplement the list with any other

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[18] HUD's *Olmstead* Statement can be found at:
http://portal.hud.gov/hudportal/documents/huddoc?id=OlmsteadGuidnc060413.pdf.

significant contributing factors not included on the list. An explanation of each contributing factor can be found in Appendix C.

Contributing factors may be outside the ability of the program participant to directly control or influence; however, such factors, if relevant to the jurisdiction and region, must be identified and prioritized. In such cases, there still may be policy options or goals that a program participant should identify, while recognizing the limitations involved.

For program participants submitting jointly, each program participant is responsible for identifying contributing factors within its jurisdiction. These factors will be prioritized in Section VI and used as a basis for establishing goals.

F. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

1. Complete questions (1). A summary of cases would typically include the parties, claims, and current status.

2. Complete question (2).

3. For question (3), consider the list of contributing factors provided and identify those factors that significantly impact fair housing enforcement, outreach capacity, and resources. Under "other," supplement the list with any other significant contributing factors not included on the list. An explanation of each contributing factor can be found in Appendix C.

Contributing factors may be outside the ability of the program participant to directly control or influence; however, such factors, if relevant to the jurisdiction and region, must be identified and prioritized. In such cases, there still may be policy options or goals that a program participant should identify, while recognizing the limitations involved.

For program participants submitting jointly, each program participant is responsible for identifying contributing factors within its jurisdiction. These factors will be prioritized in Section VI and used as a basis for establishing goals.

Part VI: Fair Housing Goals and Priorities

1. To answer question (1), use the contributing factors selected in prior sections and prioritize them. In prioritizing contributing factors, program participants shall give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance. Provide a justification for the prioritization of the factors. Note that contributing factors may be outside the ability of the program participant to directly control or influence; however, such factors, if relevant to the jurisdiction and region, must be identified and prioritized. In such cases, there still may be policy options or goals that a program participant should identify, while recognizing the limitations involved.

2. For question (2), set one or more goals to address each fair housing issue with significant contributing factors.

In answering question (2), use the table provided. Provide at least one goal addressing each fair housing issue. In the "Goals" column, state the goal that is being set. In the "Contributing Factors" column, identify the contributing factors the goal is designed to overcome. In the "Fair Housing Issues" column, identify the related fair housing issues the goal is designed to address. In

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the "Metrics and Milestones" column, identify the metrics and milestones the program participant will use for determining what fair housing results will be achieved and a timeframe for achievement. Finally, in the "Discussion" row, provide an explanation of how the goal being set is going to address the contributing factors and related fair housing issues. For program participants submitting jointly, denote which program participant is responsible for each particular goal. If program participants are setting joint goals, explain the responsibilities of each program participant with respect to the joint goal. Please note that the number of goals is not limited by the table provided. Program participants are encouraged to set more goals than the table allows for currently.[19]

Program participants should note that the strategies and actions, and the specifics of funding decisions, subject to the consolidated plan, PHA plan, or other applicable planning process are not required to be in the AFH. However, the goals set by program participants will factor into these planning processes. These goals will form the basis for strategies and actions in the subsequent planning documents. As stated in the regulatory text at § 5.150, "a program participant's strategies and actions must affirmatively further fair housing and may include various activities, such as developing affordable housing, and removing barriers to the development of such housing, in areas of high opportunity; strategically enhancing access to opportunity, including through targeted investment in neighborhood revitalization or stabilization; through preservation or rehabilitation of existing affordable housing; promoting greater housing choice within or outside areas of concentrated poverty and access to areas of high opportunity; and improving community assets such as quality schools, employment, and transportation." Goals addressing fair housing choice may include, for example, enhanced mobility options that afford access to areas of high opportunity.

settlement agreements.

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[19] HUD anticipates that the online user interface that is currently under development will allow for program participants to set as many goals as a program participant wishes.