

Affirmatively Furthering Fair Housing (AFFH)



AFFH Rule - 24 C.F.R. §§ 5.150-5.180

Purpose: To aid HUD program participants in taking meaningful actions to overcoming historic patterns of segregation, promoting fair housing choice, and fostering inclusive communities that are free from discrimination

Requirements: HUD program participants must prepare and submit an Assessment of Fair Housing (AFH), which replaces the Analysis of Impediments to Fair Housing Choice. The rule sets submission deadlines and includes requirements for the community participation process.

AFH Process



Assessment of Fair Housing

- ◆ Meaningful process to identify and understand local and regional fair housing issues and to set goals for improving fair housing choice and access to opportunity
- ◆ Includes an analysis of fair housing issues in a program participant's jurisdiction and region that leads to the establishment of goals that will assist the program participant in overcoming the contributing factors identified and related fair housing issues
- ◆ Entails the use of HUD-provided data and maps and a standard Assessment Tool, which are available through a web-based User Interface, as well as local data and local knowledge

Content of the AFH

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- **Cover Sheet**
- **Executive Summary**
- **Community Participation Process**
- **Assessment of Past Goals and Actions**
- **Fair Housing Analysis**
 - **Demographic Summary**
 - **Segregation/Integration**
 - **Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)**
 - **Disparities in Access to Opportunity**
 - **Disproportionate Housing Needs**
 - **Publicly Supported Housing Analysis**
 - **Disability and Access Analysis**
 - **Fair Housing Enforcement, Outreach Capacity, and Resources**
- **Fair Housing Priorities and Goals**

Analyze Fair Housing Issues

- ◆ Using the HUD-provided data, local data, and local knowledge the program participant will undertake the analysis of fair housing issues.
- ◆ The Assessment Tool will talk the program participant through the required analysis.
- ◆ Gather information through your community participation process and give the public reasonable opportunities for involvement in the development of the AFH.

Identify Contributing Factors

- ◆ Use the contributing factor lists in each section, accompanied by descriptions of those potential factors
- ◆ Use local data and local knowledge
- ◆ Gather information through your community participation process
- ◆ Identify contributing factors from the lists provided or any other contributing factors not listed



Glossary

Segregation

Segregation is “a condition, within the program participant’s geographic area of analysis, as guided by the Assessment Tool, in which there is a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a type of disability in a particular geographic area when compared to a broader geographic area.”
(24 C.F.R. § 5.152)

Integration

Integration is “a condition, within the program participants geographic areas of analysis, as guided by the Assessment Tool, in which there is not a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a type of disability in a particular geographic area when compared to a broader geographic area.”
(24 C.F.R. § 5.152)

Racial/Ethnic Dissimilarity Index

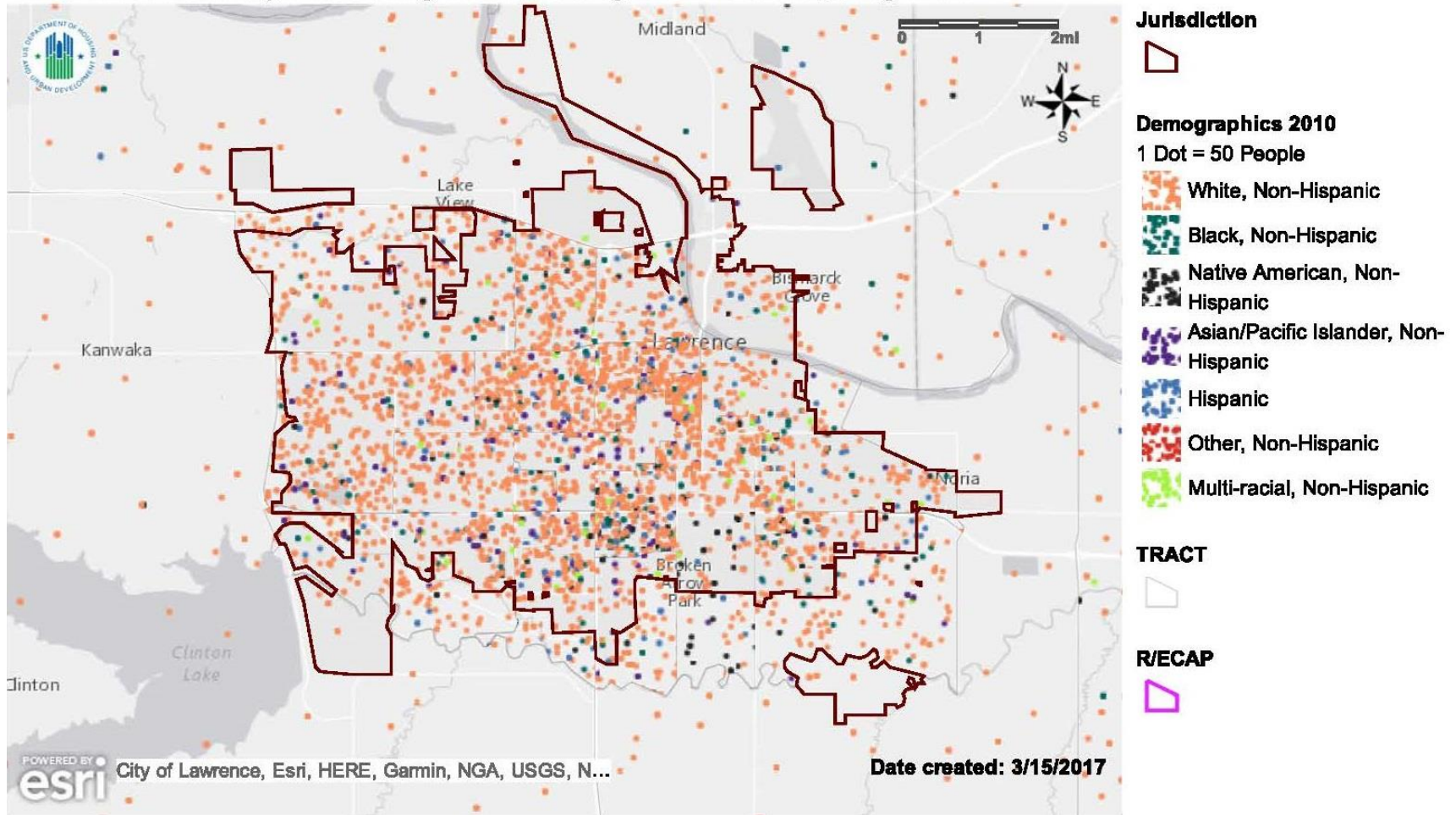
HUD Table 3 – Racial/Ethnic Dissimilarity Index	(Lawrence, KS) Jurisdiction	(Lawrence, KS) Region
	Current	Current
Non-White/White	20.09	25.38
Black/White	22.39	28.14
Hispanic/White	17.77	20.45
Asian or Pacific Islander/White	24.98	32.83

The Racial/Ethnic Dissimilarity Index (DI) provided by HUD 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 between the two groups measured. DI 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.

The DI numbers for both Lawrence and the Region generally indicate low segregation for all racial/ethnic groups. The highest levels of segregation for both Lawrence and the region is between Asian or Pacific Islander and White populations, but the DI values are still in the low segregation range.

Segregation/Integration - Lawrence

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 1 - Race/Ethnicity

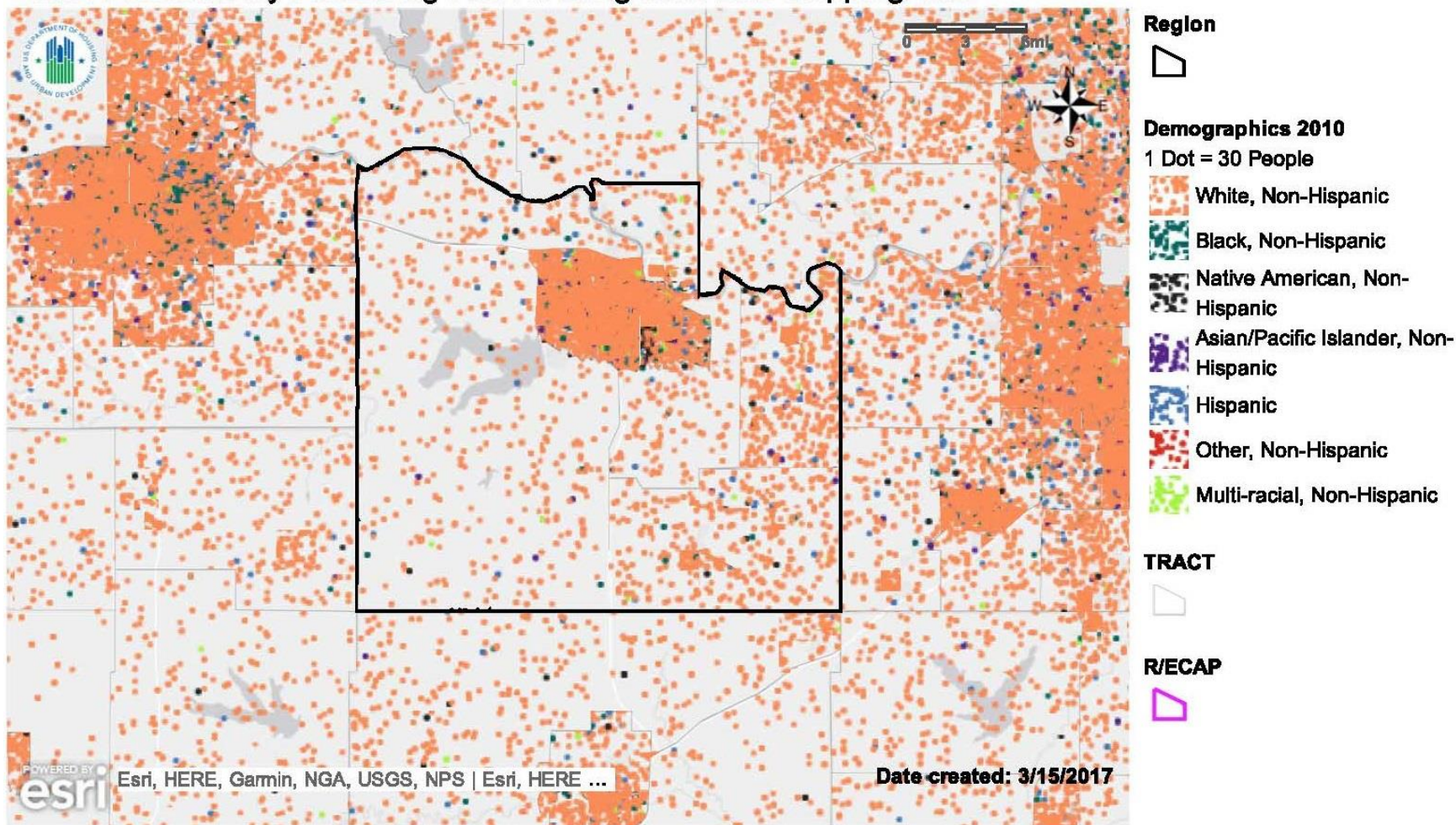
Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Lawrence (CDBG, HOME)

Region: Lawrence, KS

Segregation/Integration - Region

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 1 - Race/Ethnicity

Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Lawrence (CDBG, HOME)

Region: Lawrence, KS



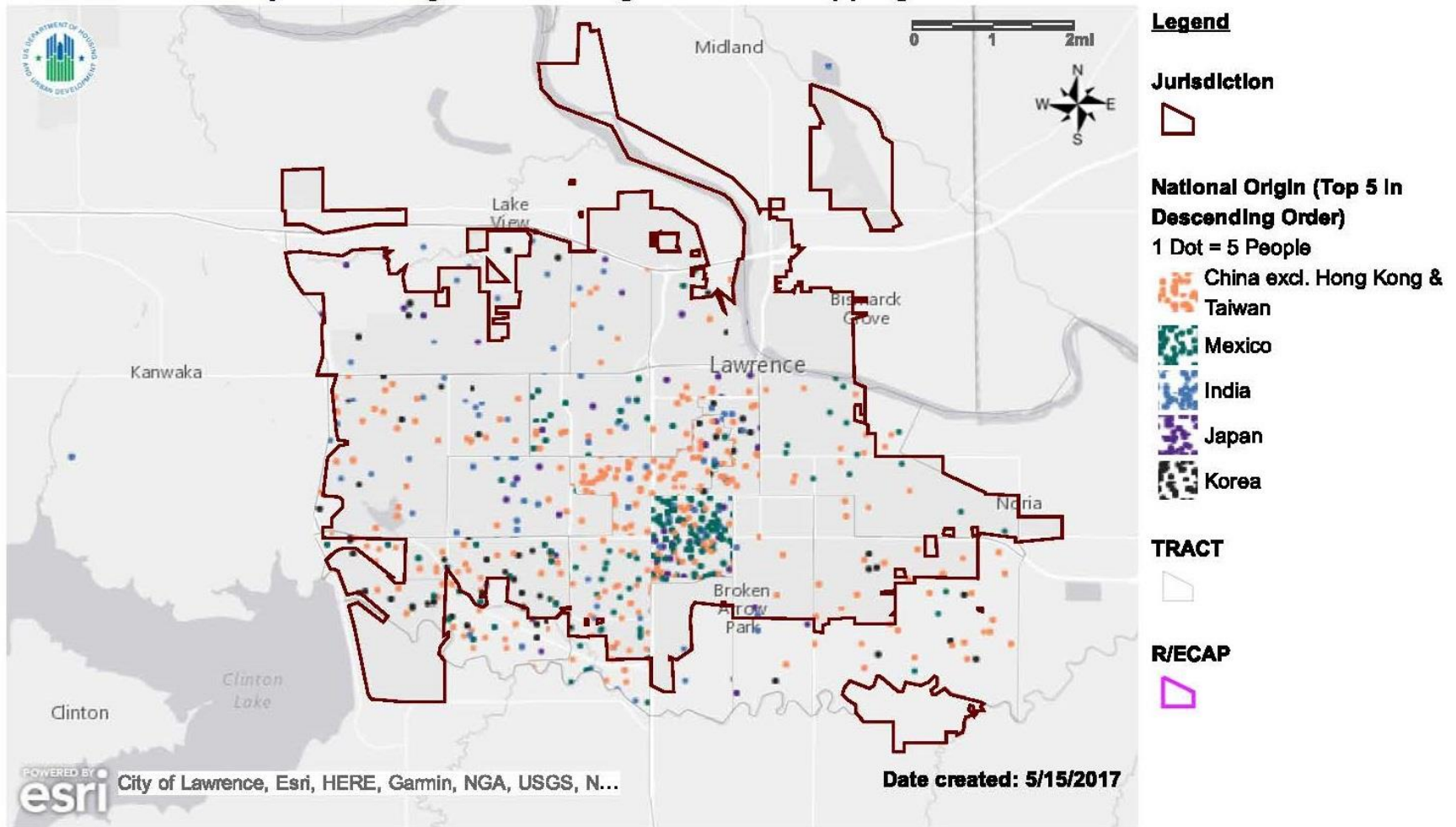
Glossary

R/ECAPs

A racially or ethnically concentrated areas of poverty is “a geographic area with significant concentrations of poverty and minority concentrations.” (24 C.F.R. § 5.152)

R/ECAPS - None in Lawrence

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 3 - National Origin

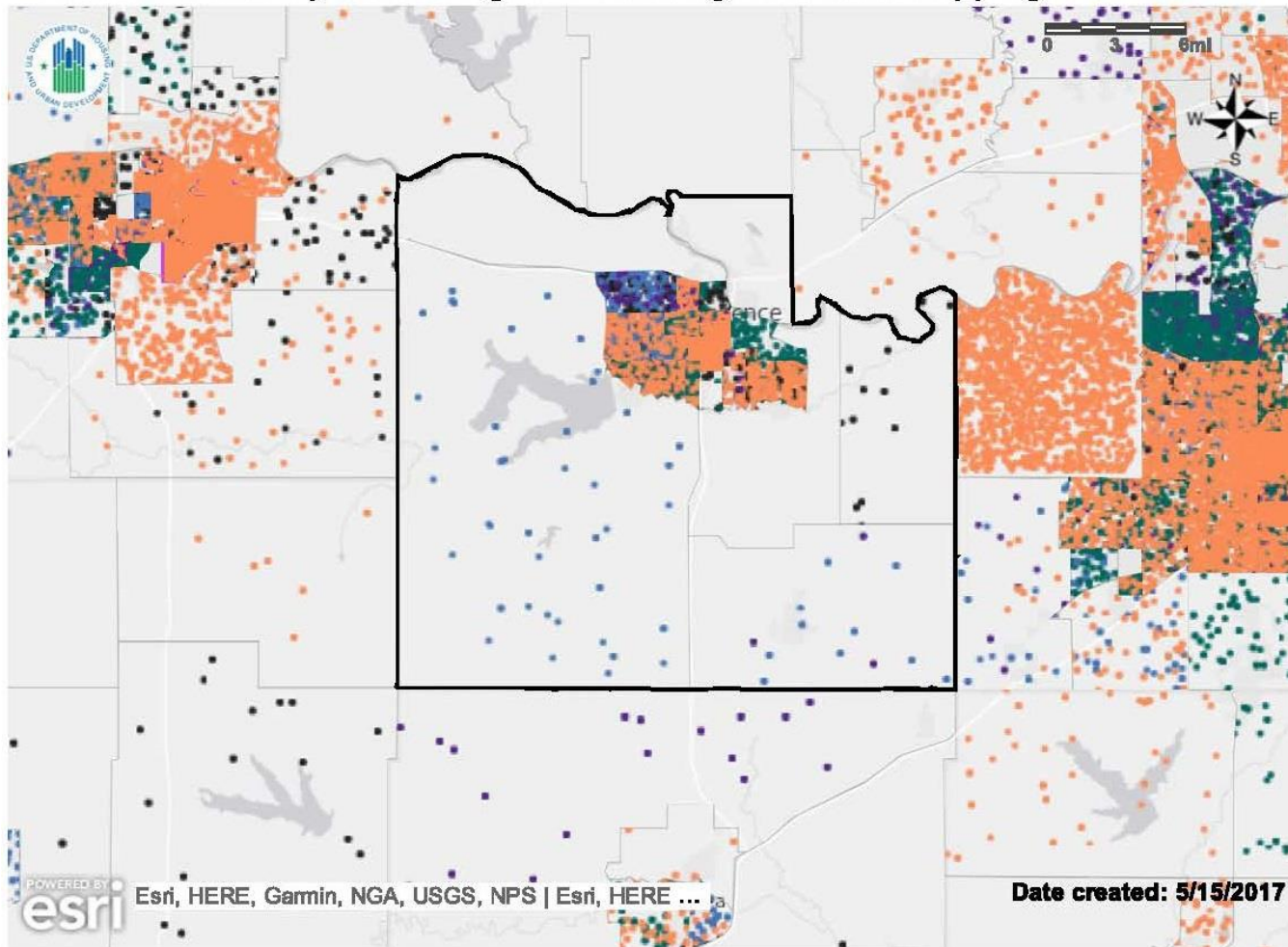
Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Lawrence (CDBG, HOME)

Region: Lawrence, KS

R/ECAPS - None in Region

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Legend

Region



National Origin (Top 5 In Descending Order)

1 Dot = 1 People

- China excl. Hong Kong & Taiwan
- Mexico
- India
- Japan
- Korea

TRACT



R/ECAP



Name: Map 3 - National Origin

Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Lawrence (CDBG, HOME)

Region: Lawrence, KS



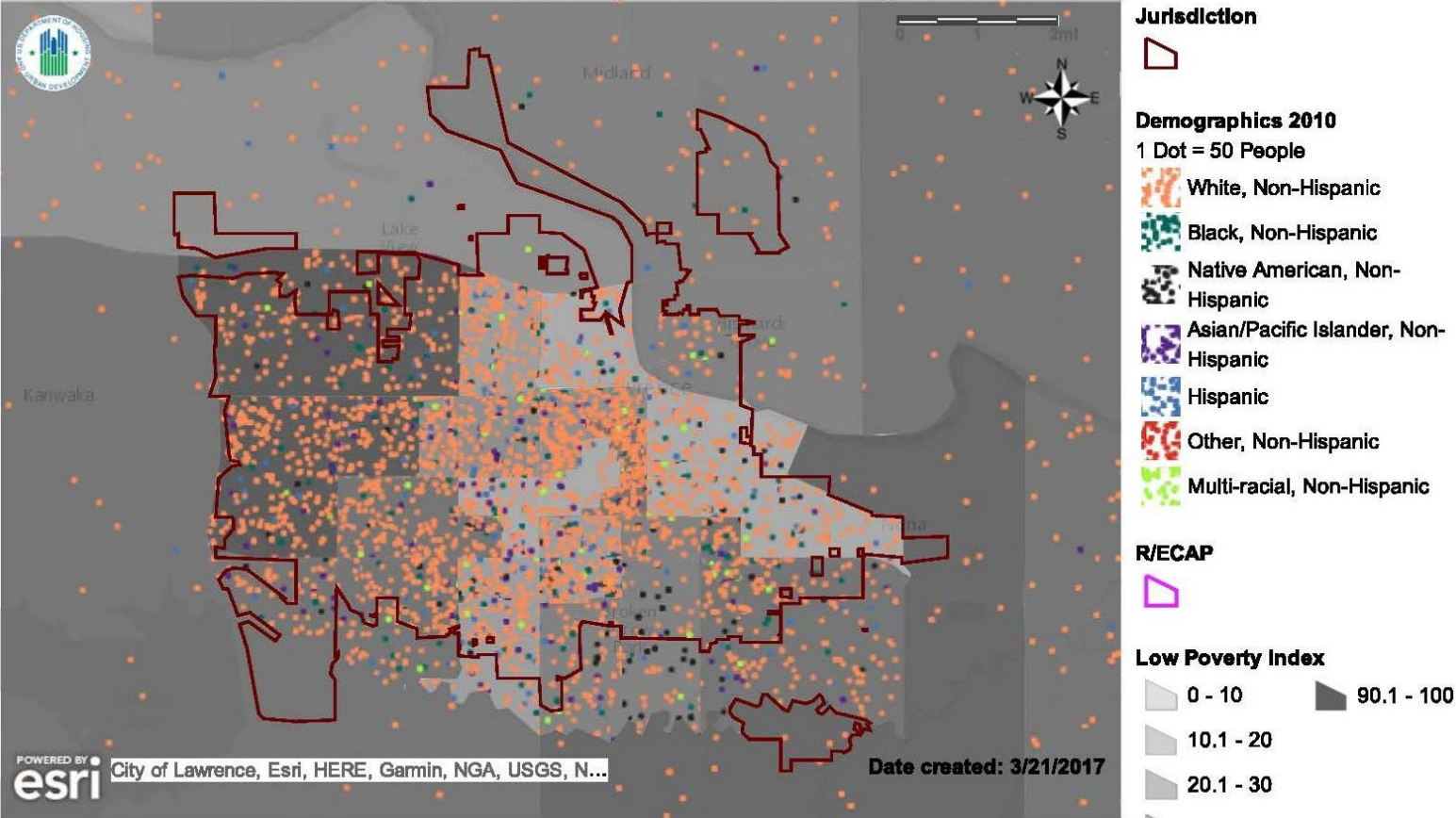
Glossary

Disparities in Access to Opportunity

Substantial and measurable differences in access to educational, transportation, economic, and other opportunities in a community based on protected class related to housing. (24 C.F.R. § 5.152)

Disparities in Access to Opportunity

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 12 - Demographics and Poverty

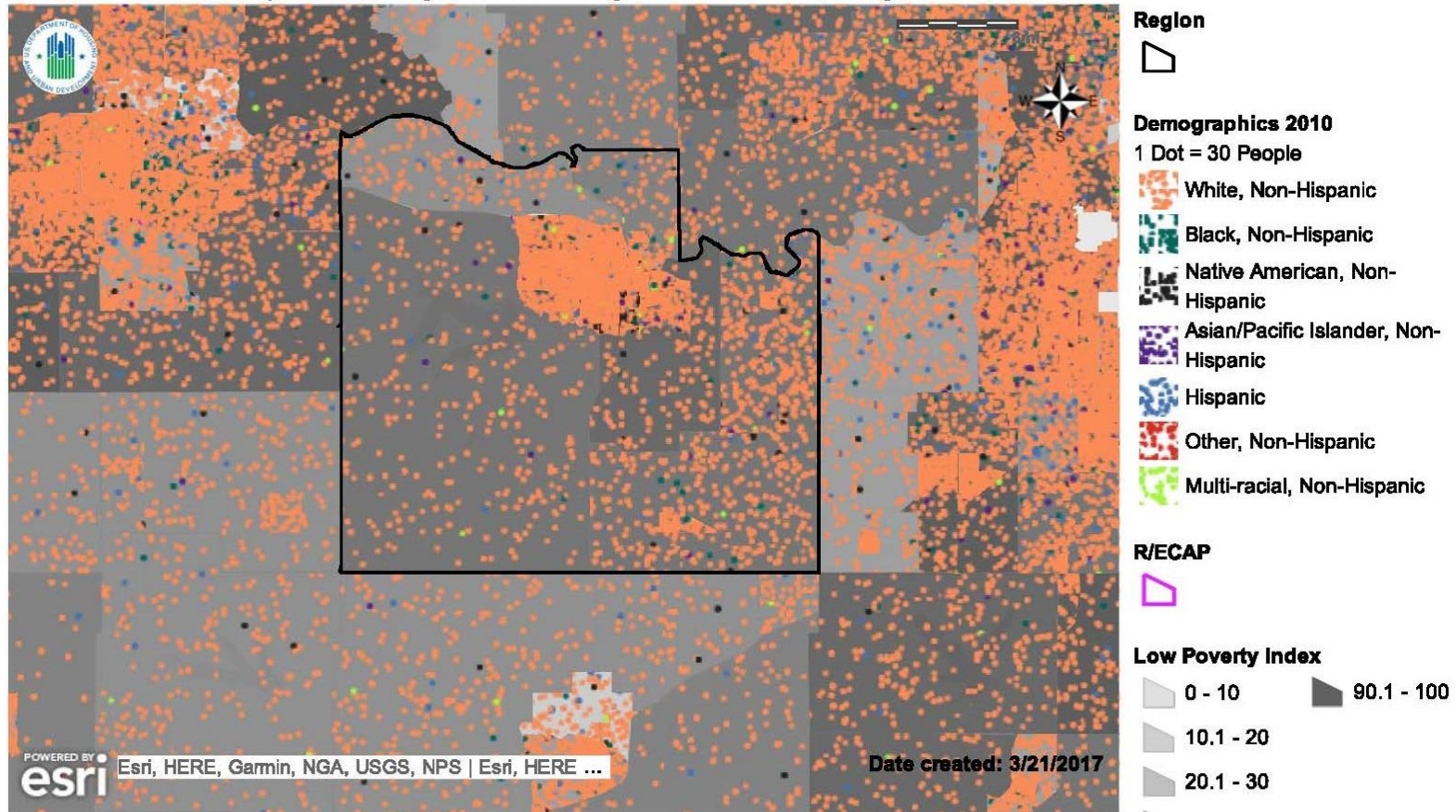
Description: Low Poverty Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Lawrence (CDBG, HOME)

Region: Lawrence, KS

Disparities in Access to Opportunity

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 12 - Demographics and Poverty

Description: Low Poverty Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Lawrence (CDBG, HOME)

Region: Lawrence, KS

Disparities in Access to Opportunity

Table 12 – Opportunity Indicators by Race/Ethnicity

Table 12 - Opportunity Indicators, by Race/Ethnicity

(Lawrence, KS CDBG, HOME) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	62.71	65.31	83.96	34.94	62.10	49.51	49.31
Black, Non-Hispanic	58.69	62.02	81.27	34.46	62.48	49.77	51.33
Hispanic	58.46	63.58	82.27	34.85	63.06	50.18	49.56
Asian or Pacific Islander, Non-Hispanic	59.70	62.18	76.53	33.65	63.69	52.38	49.07
Native American, Non-Hispanic	58.80	61.66	82.91	31.53	59.78	48.32	52.85
Population below federal poverty line							
White, Non-Hispanic	59.85	67.87	84.62	38.84	67.28	51.46	44.08
Black, Non-Hispanic	54.28	62.72	77.85	35.69	64.24	53.23	48.72
Hispanic	55.45	65.97	83.37	38.21	67.34	54.82	44.17
Asian or Pacific Islander, Non-Hispanic	57.44	58.71	79.36	36.09	65.64	50.96	47.24
Native American, Non-Hispanic	51.28	66.57	78.72	35.29	62.79	52.94	51.62
(Lawrence, KS) Region							
Total Population							
White, Non-Hispanic	65.09	65.31	83.70	29.84	54.97	49.51	56.23
Black, Non-Hispanic	59.62	62.02	81.22	33.11	60.53	49.77	53.05
Hispanic	60.13	63.58	82.30	32.44	59.44	50.18	52.90
Asian or Pacific Islander, Non-Hispanic	60.31	62.18	76.83	32.84	62.41	52.38	50.28
Native American, Non-Hispanic	59.90	61.66	82.84	30.07	57.59	48.32	54.62
Population below federal poverty line							
White, Non-Hispanic	60.65	68.26	84.47	37.40	65.18	50.15	46.16
Black, Non-Hispanic	54.50	62.84	77.68	35.57	64.03	53.00	48.96
Hispanic	55.93	65.94	83.51	37.61	66.68	54.10	44.69
Asian or Pacific Islander, Non-Hispanic	57.55	58.77	79.39	36.05	65.58	50.67	47.34
Native American, Non-Hispanic	51.65	66.64	78.24	35.10	62.44	52.74	51.97

Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA

Note 2: Refer to the Data Documentation for details (www.hudexchange.info).



Glossary

Disproportionate Housing Needs

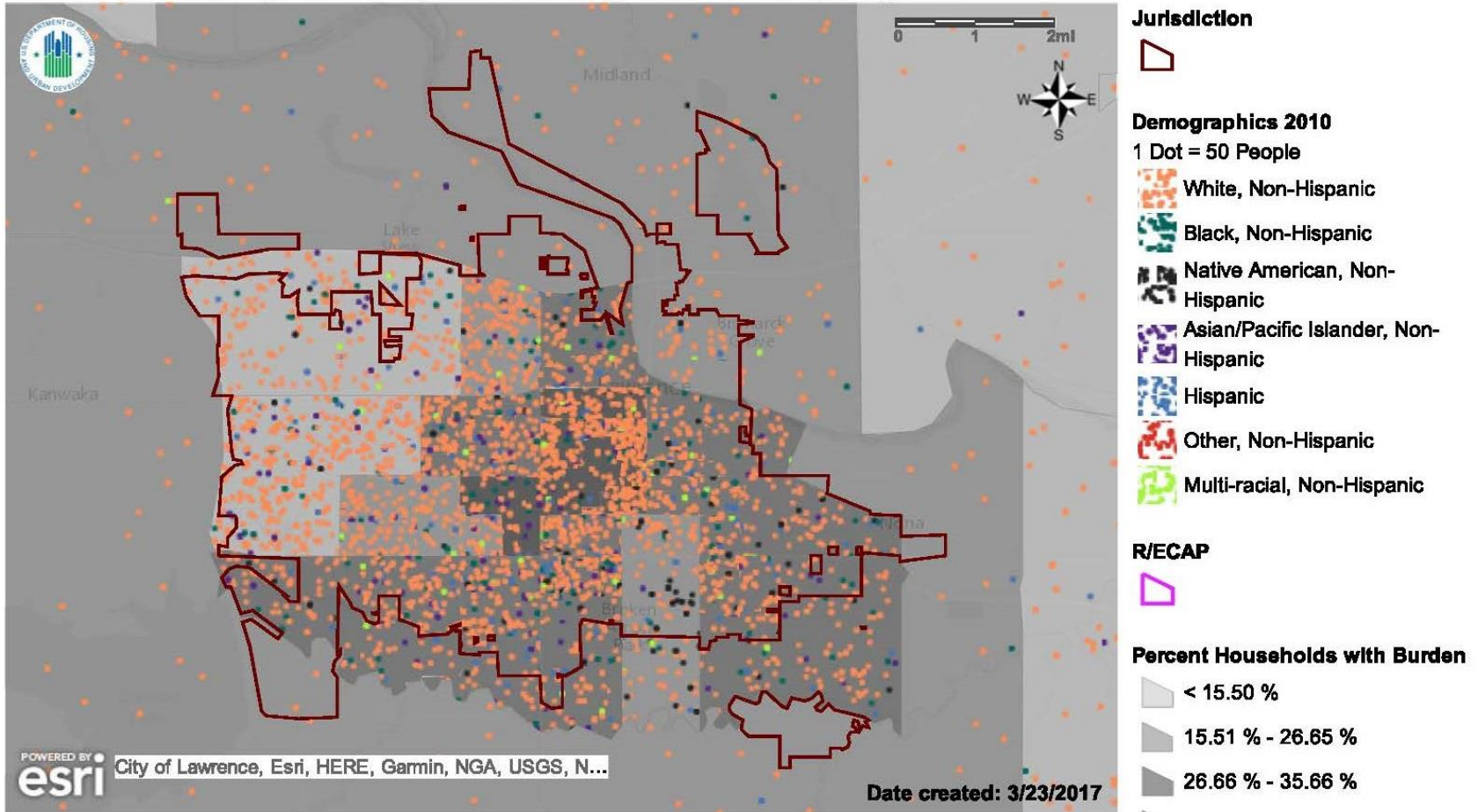
A condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of members of any other relevant groups or the total population experiencing that category of housing need in the applicable geographic area. (24 C.F.R. § 5.152)

HUD-provided data on housing problems:

- Cost-burden and severe cost burden
- Overcrowding
- Substandard housing

Disproportionate Housing Needs

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 6 - Housing Problems

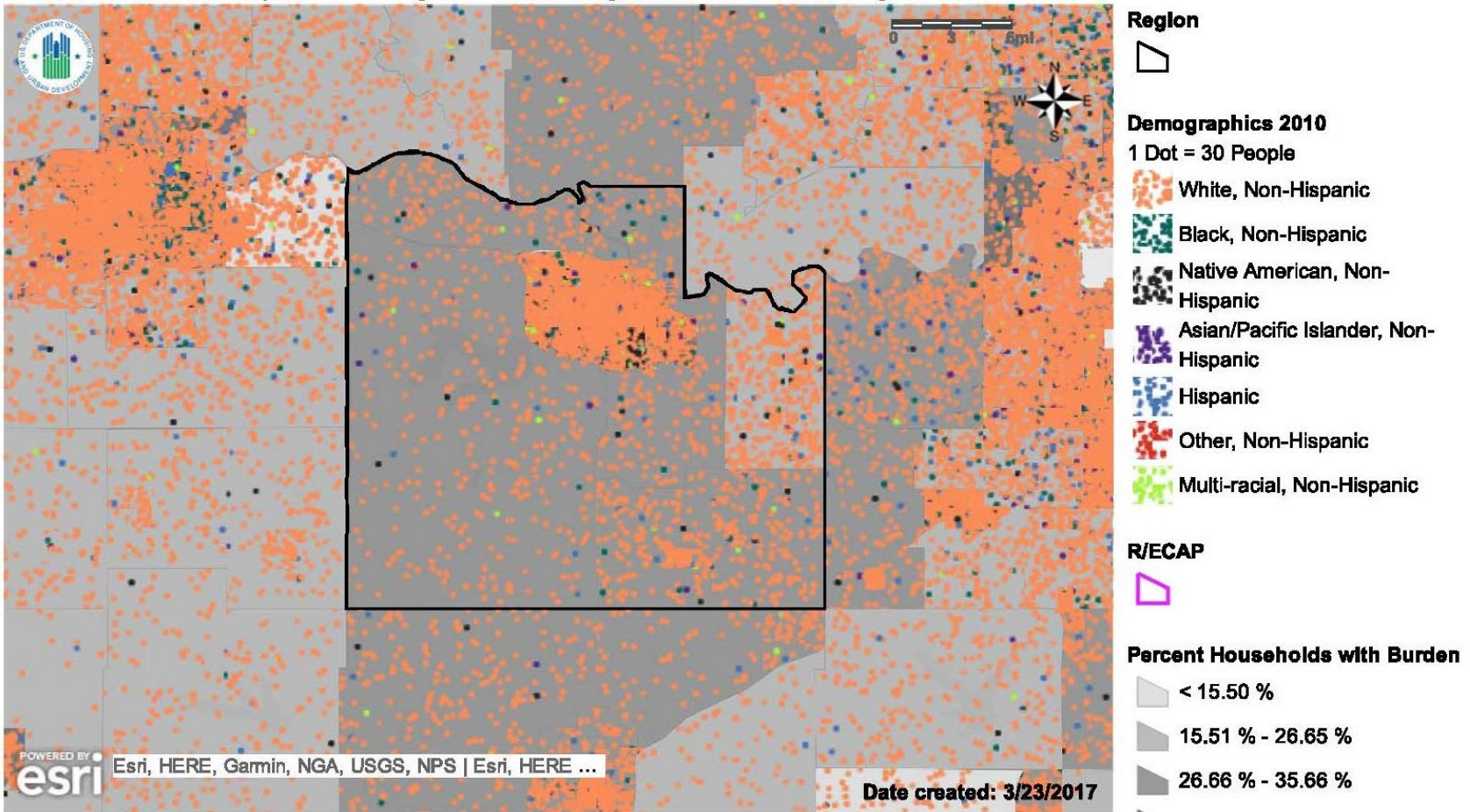
Description: Households experiencing one or more housing burdens in Jurisdiction and Region with R/ECAPs and race/ethnicity dot density

Jurisdiction: Lawrence (CDBG, HOME)

Region: Lawrence, KS

Disproportionate Housing Needs

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 6 - Housing Problems

Description: Households experiencing one or more housing burdens in Jurisdiction and Region with R/ECAPs and race/ethnicity dot density

Jurisdiction: Lawrence (CDBG, HOME)

Region: Lawrence, KS



Glossary

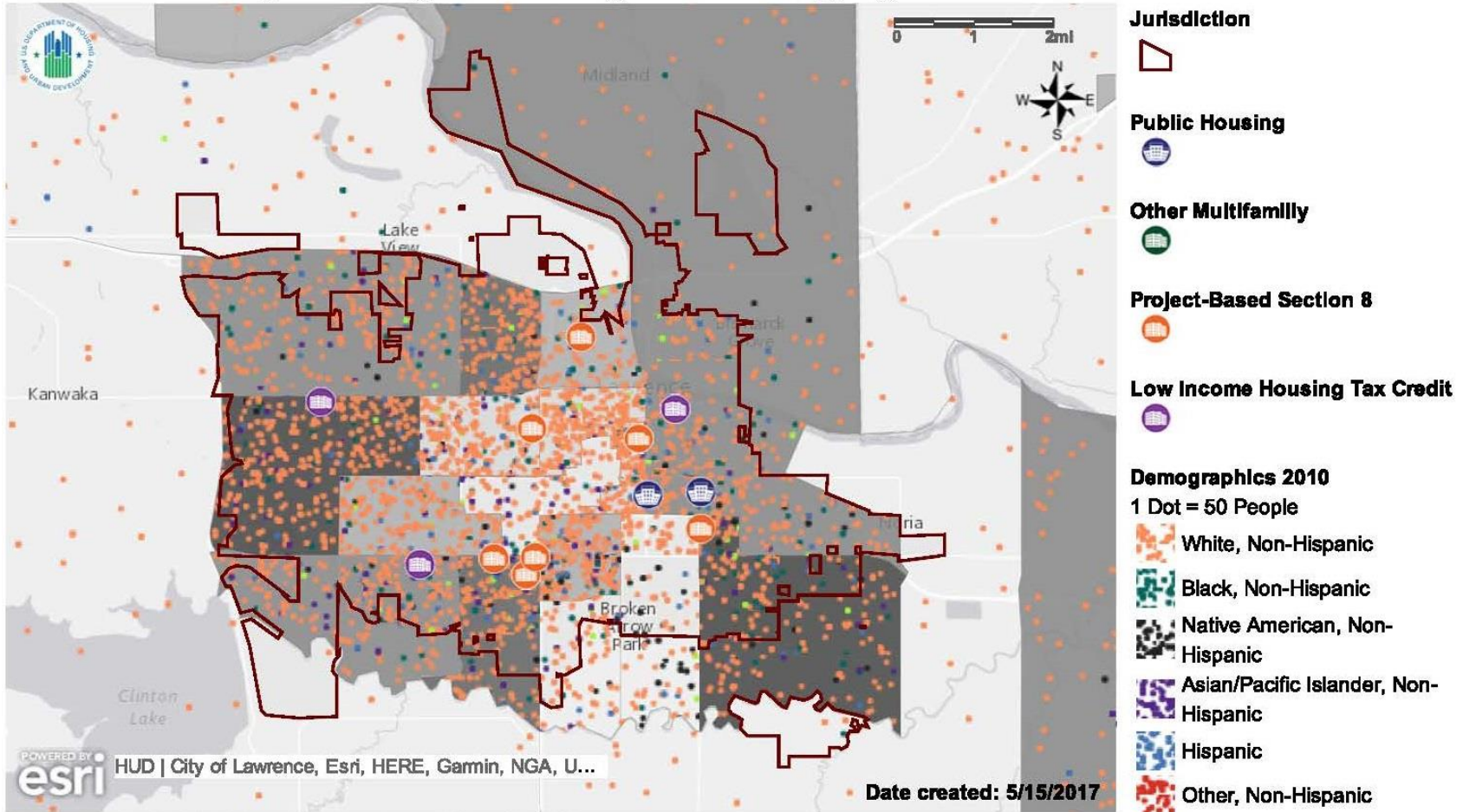
Publicly Supported Housing

HUD provides data for five categories of publicly supported housing:

1. Public housing
2. Project-based Section 8
3. Other HUD Multifamily Assisted developments, including Section 202 Supportive Housing for the Elderly and Section 811 Supportive Housing for Persons with Disabilities
4. Housing Choice Vouchers
5. Housing developed through Low Income Housing Tax Credits (LIHTC)

Publicly Supported Housing Analysis

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 5 - Publicly Supported Housing and Race/Ethnicity

Description: 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

Jurisdiction: Lawrence (CDBG, HOME)

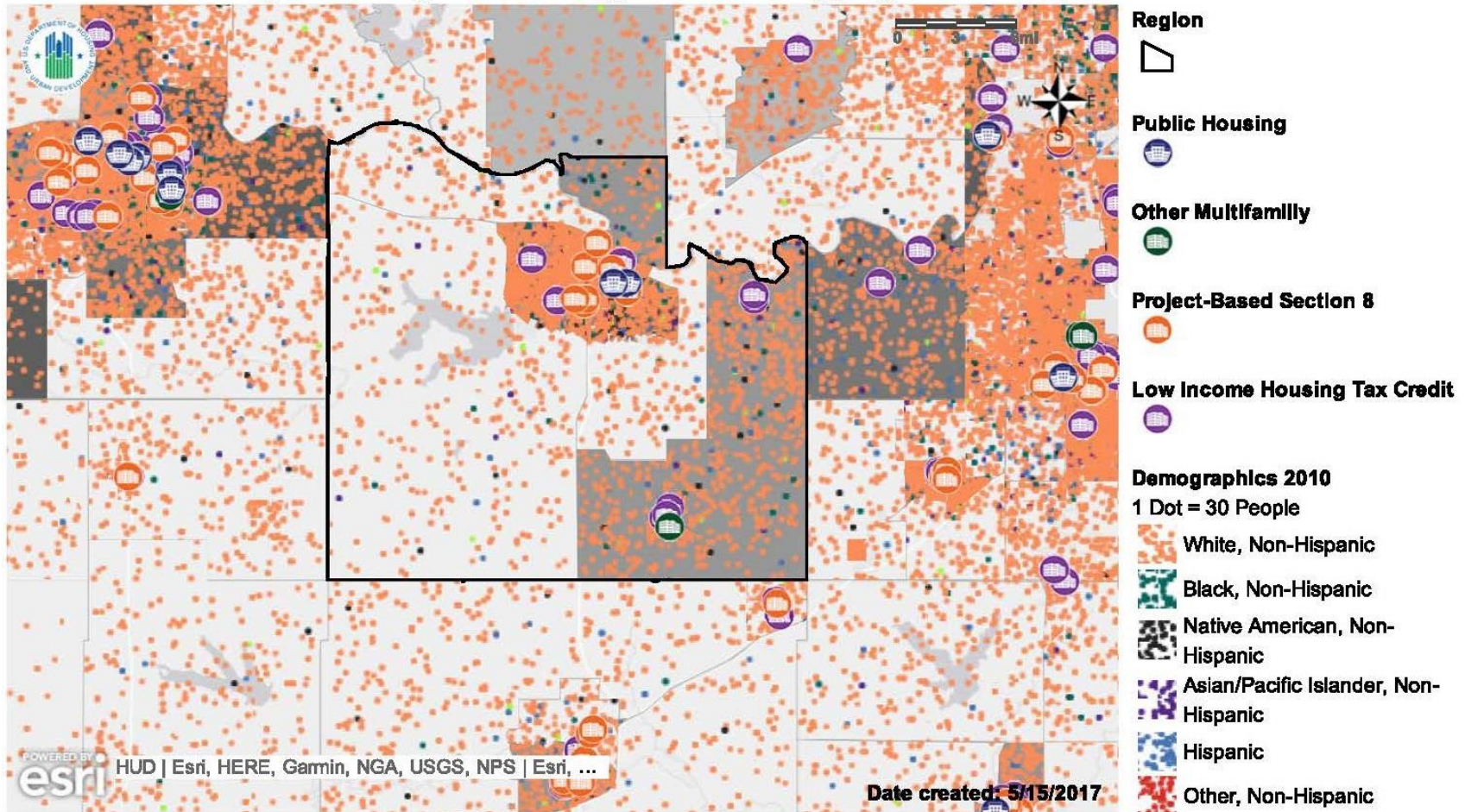
Region: Lawrence, KS

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Publicly Supported Housing Analysis

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 5 - Publicly Supported Housing and Race/Ethnicity

Description: 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

Jurisdiction: Lawrence (CDBG, HOME)

Region: Lawrence, KS

TRACT





Glossary

Disability and Access

Segregated & Integrated Settings

Segregation includes a condition in which the housing or services are not in the most integrated setting appropriate to an individual's needs in accordance with the requirements of the Americans with Disabilities Act and section 504 of the Rehabilitation Act of 1973. (24 C.F.R. § 5.152)

Integration means that such individuals are able to access housing and services in the most integrated setting appropriate to the individual's needs. The most integrated setting is one that enables individuals with disabilities to interact with persons without disabilities to the fullest extent possible, consistent with the requirements of the Americans with Disabilities Act and section 504 of the Rehabilitation Act of 1973. (24 C.F.R. § 5.152)



Fair Housing Enforcement and Outreach Capacity

means the ability of a jurisdiction, and organizations located in the jurisdiction, to accept complaints of violations of fair housing laws, investigate such complaints, obtain remedies, engage in fair housing testing, and educate community members about fair housing laws and rights. (24 C.F.R. § 5.152)

Fair Housing Priorities and Goals

- ◆ After analyzing fair housing issues and identifying contributing factors:
 - Prioritize the identified contributing factors and justify the prioritization
 - Establish one or more fair housing goals for each identified fair housing issue with significant contributing factors
 - Discuss how each goal is designed to overcome the identified contributing factor and address the related fair housing issue
 - Identify metrics, milestones, and a timeline for results
 - For joint or regional AFHs, identify the responsible party for each goal established in the AFH

The AFH and Subsequent Planning Documents

- ◆ Integrate the fair housing goals set in their AFH into their Consolidated Plans, Annual Action Plans, and PHA Plans.
 - › Strategies and meaningful actions to address the fair housing goals and priorities from the AFH must be included in the program participants' Consolidated Plans, Annual Actions Plans, and PHA Plans. 24 C.F.R. §§ 5.154(d)(5), 91.215(a)(5), 91.220(k)(1), 91.315(a)(5), 91.320(j)(1), 91.415, 91.420(b), 903.7(o).
 - › Consolidated Plans and Annual Action Plans must identify resources that will be used to carry out actions. 24 C.F.R. §§ 91.220(c), 91.320(c), 91.420b).
 - › PHA Plans must specifically address issues relating to tenant selection and the concentration of tenants with protected characteristics. 24 C.F.R. § 903.15(d)(2).
- ◆ Include certifications that program participants will affirmatively further fair housing. 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1)(i), 903.7(o)(1).



Resources

For more information in preparing your AFH, visit the AFFH Webpage on the HUDExchange:

<https://www.hudexchange.info/programs/affh/>

Refer to:

- › The AFFH Rule
- › The AFFH Rule Guidebook
- › The Assessment Tool

Or the City's AFFH website:

<https://lawrenceks.org/attorney/fairhousing/assessment/>

Upcoming Meetings

- ◆ August 14, 2017 – Affordable Housing Advisory Board
City Commission room of City Hall, 11:00am
- ◆ August 17, 2017 – Human Relations Commission
Carnegie Building, 5:30pm