Resources and assistance to support HUD's community partners

HUD EXCHANGE

Lessons from the Ground: Best Practices in Fair Housing Planning

Table of Contents

Lessons from the Ground: Best Practices in Fair Housing Planning

A guide for HUD program participants to eliminate housing discrimination, promote economic equality, and achieve diverse, inclusive communities.

HUD and its program participants are required to Affirmatively Further Fair Housing (AFFH), a concept that originates in Title VIII of the Civil Rights Act of 1968, known as the **Fair Housing Act**.

Affirmatively furthering fair housing requires HUD program participants, including state and local governments and public housing agencies (PHAs), to combat discrimination and take meaningful actions that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on seven federally protected characteristics, described below. Among other actions, program participants, affirmatively further fair housing by addressing disparities in access to opportunities such as quality schools, quality foods, healthy environments, access to employment, and transportation connectivity. Before they can act, they should conduct planning to identify barriers to fair housing and determine the best steps to address them.

Through a fair housing planning process, HUD program participants develop a team to lead and support the efforts, engage with community members and stakeholders, collect and analyze data, and set meaningful goals to AFFH. **When done well, fair housing plans create a foundation for progress – bringing together the people, knowledge, and direction needed to make lasting change.**

About the Toolkit

This toolkit offers general fair housing guidance to help HUD program participants complete meaningful fair housing plans. It covers each dimension of the planning process, from assembling a team to setting effective goals. This guidance is not specific to any rule, regulation, or planning format, such as the Analysis of Impediments (AI) or Assessment of Fair Housing (AFH). The toolkit is instead applicable to any fair housing planning effort. While every community is unique, the best practices outlined here are designed to assist program participants of all sizes, capacities, and locations.

The best practices described in this toolkit were identified through interviews with dozens of HUD program participants who completed recent fair housing plans, as well as interviews with stakeholder groups in their communities. Insights from these interviews were the primary source for best practice outlined in this toolkit.

Who Should Use This Toolkit?

This toolkit is designed to support HUD program participants, including local governments, states, and public housing agencies, that are obligated to affirmatively further fair housing (AFFH), as well as community members and organizations interested in Fair Housing Planning.

AFFH requires HUD program participants to combat discrimination and take meaningful actions that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on seven federally protected characteristics:

- Race
- Color
- National Origin
- Religion
- Sex—includes gender identity and sexual orientation
- Familial Status—includes families with children under the age of 18, pregnant persons, any person in the process of securing legal custody of a minor child (including adoptive or foster parents), persons with written permission of the parent or legal guardian
- Disability

The toolkit is divided into five sections covering the major steps in fair housing planning. Each section offers specific guidance, examples from successful planning efforts, and links to additional resources. Sections do not need to be navigated in sequential order. You can choose among the elements that are relevant to your planning needs.

Click on one of the following boxes to enter a section.

As you navigate through the toolkit, it is helpful to keep several basic principles of fair housing planning in mind. The obligation to affirmatively further fair housing originates from the Fair Housing Act, which applies on the basis of seven protected characteristics. These seven protected characteristics should be the focus of fair housing planning efforts:

- **Race**
- **Color**
- **National Origin**
- **Religion**
- **Sex** — includes gender identity and sexual orientation
- **Familial Status** — includes families with children under the age of 18, pregnant persons, any person in the process of securing legal custody of a minor child (including adoptive or foster parents), persons with written permission of the parent or legal guardian
- **Disability**

Successful planning efforts tend to share several key characteristics. They are:

- **Collaborative**, bringing as many partners and stakeholders into the planning process as is manageable to pool resources and knowledge. This may mean regional collaboration between multiple jurisdictions, collaboration internally with relevant offices, and/or diverse community participation.
- **Holistic**, considering factors like health, education, employment, food access, and transportation that extend beyond traditional housing issues.
- **Data-driven**, collecting and analyzing a variety of data to inform goal setting.
- **Realistic**, focused on creating the greatest possible impact through resources that a program participant can reasonably expect to muster.
- **Creative**, considering new policy approaches and remaining open to innovative ideas to affirmatively further fair housing, such as incorporating fair housing plans into other local, regional or state plans.

It is important to keep these principles in mind during each step of the planning process. If completed effectively, your finished fair housing plan will set a roadmap for meaningful change, helping you not only to fulfill the AFFH obligation, but to **make your community a more inclusive and equitable place for all residents.**

Assembling a Fair Housing Planning Team

To begin fair housing planning, HUD program participants should establish who will participate in the process. This includes selecting individuals to work in roles like community participation coordinator, data analysis lead, and government liaison. Regardless of staff capacity, you should consider how to marshal the resources available to you to plan effectively. This section describes strategies for maximizing capacity with existing resources.

In the section, you will learn about:

- Identifying staff who can complete each element of the planning process
- Forming an advisory committee
- Deciding whether or not to hire a consultant

Select a topic below to learn more about assembling a fair housing planning team:

Assessing and Maximizing Local Capacity

This module will discuss strategies for assessing the staff and resources HUD program participants have available for the fair housing planning process and how to manage those assets to create a successful fair housing plan. This includes identifying staff to lead and support the planning process, developing a viable timeline for plan creation, enhancing staff capacity through training, and forming an advisory committee (government and non-government partners) to oversee and assist with the fair housing planning process.

Step 1: Establish the team and/or advisory committee who will be responsible for overseeing and completing a successful fair housing plan

Whether the fair housing plan is a joint collaboration across different city agencies, or multiple municipalities, or with PHAs, it is important to **include each agency's point person as an active participant in the fair housing planning team**. Your fair housing plan may also encompass goals across a wide range of areas including housing, transportation, education, food access, healthcare, and government benefits and programs. As such, you will want to be sure that the fair housing team and/or advisory committee represents these areas.

It is also important to delineate who will be responsible for each aspect of the plan, including establishing a clear Fair Housing Plan Coordinator for the report and clarifying specific responsibilities for each member of the team. Identifying internal collaborators and key points of contact in other city agencies will also be critical to pursue the interdisciplinary goals of affirmatively furthering fair housing, as the following examples illustrate.

Step 2: Consider the internal capacity and resources dedicated to executing a successful fair housing plan for your jurisdiction

While every fair housing team is different, a good team includes those who can analyze data, conduct fair housing mapping, convene stakeholders, write reports, and build consensus with leadership regarding fair housing goals. After determining the members of your fair housing team, **figure out the strengths and technical resources that will be leveraged for your jurisdiction or agency's fair housing plan**. This includes getting a sense of the number of staff and staff hours that can be

committed to the planning process and the types of available skills that can be leveraged to produce the fair housing plan. For example, departments or individuals may be able to assist with spatial or data analysis or may even have expertise in writing plans for HUD.

Step 3: Develop a 6-to-12-month timeline and determine responsibilities for team members

After establishing your fair housing team and/or advisory committee and determining the internal capacity and resources that can be dedicated to executing a successful fair housing plan, your team can then **determine an appropriate timeline** for the completion of the fair housing plan. In addition, the advisory committee can then delegate responsibilities of the different parts of completing your fair housing plan.

Example: Assembling an Inclusive Team in Seattle

Seattle's fair housing planning team worked in collaboration with multiple government agencies and community organizations to develop their fair housing plan. This plan included:

- A timeline based on available financial and staff resources
- An advisory committee featuring representatives from over 20 city agencies, tasked with informing data collection, community outreach, and goal setting
- Partnership with a local university to expand data cleaning, analysis, and visualization capacity
- A consultant hired to support specific data analysis, community participation, and drafting tasks which the city and its partners did not have capacity to fulfill

Example: Team Building Across Kansas City

In Kansas City, a trusted regional convener, the Mid-America Regional Council (MARC), led the AFFH process with five cities in the metropolitan area and the Kansas City Housing Authority. Each city identified a point of contact to work with MARC on the process. Strong involvement from the Kansas City Housing authority, in particular, was seen as particularly valuable to enable goal development in areas such as housing choice voucher policy. MARC worked with a large group of community organizations, the Regional Equity Network, to help run their community participation process and serve as consultants on the plan, as well as faculty from the University of Kansas.

Evaluating the Use of Consultants

HUD program participants know their community better than anyone else. However, in the past some HUD program participants elected to hire an external consultant to assist with their fair housing planning. It is at the discretion of the program participant if they want to complete their fair housing plan on their own or use consultants to support fair housing planning. Given that HUD program participants are the most important experts in their own communities, consultants should only be used to supplement, rather than replace, the work of the HUD program participant. Without consistent, direct involvement from the HUD program participant, that local knowledge and expertise may not make it into the plan. This module will discuss lessons learned when considering hiring consultants to work on your fair housing plan.

Considering and hiring consultants to assist with the creation of your jurisdiction or agency's fair housing plan can take different forms based on the resources and capacity of the fair housing planning team.

Step 1: Consider aspects of the fair housing plan that a consultant can enhance

After assessing the fair housing team's internal capacity (number of staff, hours available, expertise, and technical skill that can be used to support the planning process), consider what aspects of the planning process may require additional external assistance to complete. Because you know your community best, avoid outsourcing core analysis and goal-setting tasks to outside consultants.

Remember that program participants are the experts in the fair housing planning process. Ideally, you should conduct as much of the work as possible and only rely on consultants for small, specific tasks when warranted. If you do engage a consultant, be sure to meet with them regularly to ensure their work is meeting your objectives and informed by your expert knowledge of your community, and review any content they produce to confirm its accuracy.

Step 2: Maintain open communication with the consultants as the fair housing plan evolves and is submitted to HUD

After hiring a consultant, it is important to maintain open communication about deliverables and progress towards them. Many HUD program participants conducting fair housing planning maintained

bi-weekly meetings with their consultants to discuss their fair housing progress and figure out how to enhance their fair housing plan. These meetings can also help the fair housing team establish new partnerships and connections that can be leveraged through a consultant.

Example: Using Consultants Effectively

The City of Los Angeles' fair housing team decided to hire a consultant to assist in the data analysis for their fair housing planning process, as well as write and format the final draft of the plan. After evaluating their internal resources, staff time and skill sets, the team decided it would be in their best interest to hire a consultant to help facilitate the data analysis, while the fair housing team focused on the community participation process and developing goals for the plan. The City of Los Angeles felt It was better to keep the goal creation a product of community participation and government programs and initiatives.

The consultant maintained an open line of communication with regular check-ins and was responsible for working with HUD's technical assistance team in creating and generating the data analysis for the fair housing plan.

The consultants assisted with formulating the data driven goals established during the community participation process by the plan's advisory committee, providing suggestions on how to measure the goals over time.

Collaborating Among HUD Program Participants

Fair housing planning often involves multiple partners, such as different levels of government, whether that is states collaborating with non-entitlement jurisdictions, other public agencies, and/or public housing agencies (PHAs). Fair housing plans address local conditions, but often negotiate various jurisdictional boundaries and institutional responsibilities.

This section offers guidance for promoting interdepartmental and regional collaboration in fair housing planning, and for ensuring that collaboration continues into the implementation stage. Collaboration with external stakeholders is also helpful, and is discussed in the module **Partnering with Non-Governmental Organizations**.

In the section, you will learn about:

- Incorporating intragovernmental cooperation with other relevant departments within a local jurisdiction
- Leveraging new and preexisting relationships with local partners to support fair housing efforts
- How unified plans produced by multiple HUD program participants, such as entitlement jurisdictions and PHAs in a region, can improve fair housing analysis and lead to more effective policy interventions
- Bringing political leaders on board with the planning process

Select a topic below to learn more about collaborating with governmental partners:

Structuring Collaboration Within Government

This module discusses how HUD program participants can foster long-term collaborations with other governmental partners and involve them effectively in fair housing planning. This module also describes successful forms of collaboration that can yield significant benefits in furthering fair housing objectives.

Why Collaboration Is Important for Fair Housing Planning

Collaboration can strengthen a fair housing planning effort by expanding HUD program participants' capacity, expertise, and understanding of fair housing issues. Intragovernmental collaboration can help ensure that all relevant departments (not just housing and community development) are operating from a fair housing perspective and can help address fair housing issues. Fair housing informs HUD program participants' everyday activities, from community planning and development to policies around public housing and housing choice voucher programs. Fair housing impacts all programs and policies when effectively designed, and can also help other departments and partners achieve their goals. Further, collaboration can strengthen existing relationships and create new partnerships to address shared goals collectively.

Approaches to Collaboration

There are many ways that program participants can collaborate with partners from within their same government or PHA on fair housing planning and implementation. For example, you can invite partners to **serve as advisors for the planning process**, participate in **topic-specific taskforces**, or consult them on an as-need basis regarding aspects of fair housing planning specific to their department or organization.

Fruitful governmental partnerships often include personnel who work on:

- Transportation
- Public Health
- Economic/Business Development
- Public Schools
- Racial Equity
- Environment and Natural Resources
- Staffing for mayors, city managers, council members, and other leadership positions

No matter what approach you choose, **it is helpful to establish communication early on to foster buy-in and a sense of ownership** from all parties. The following flip cards include other collaboration best practices shared by program participants based on lessons learned from their fair housing efforts.

Below see additional information about collaborating with intragovernmental partners.

Convene a Meeting of All Relevant Jurisdiction Department Heads Early in the Fair Housing Planning Process

This can help program participants access the full scope of intragovernmental perspectives on fair housing and related issues.

Consider How Fair Housing Planning Intersects with Other Ongoing Efforts within the Jurisdiction

For example, if a jurisdiction is also pursuing zoning reform or a comprehensive plan update, HUD program participants can tailor their intragovernmental outreach to support these efforts.

Work Consistently with Adjacent Elements of Local Government

Fair housing work often intersects with community development, business development, zoning, and human relations efforts. Sustained collaboration across departments on all housing issues, not just fair housing planning, builds relationships that make it easier to complete cooperative tasks like fair housing planning. Successful program participants often develop mutual accountability relationships with other departments, where they routinely offer feedback and oversight on each other's work.

Example: Building Relationships in Savannah, GA

In Savannah, authority over housing issues is splintered across multiple city departments and a metropolitan planning council. While these divisions could inhibit successful planning, city staff have taken care to cultivate long-term relationships across local government. Staff from multiple departments meet on a standing housing taskforce and routinely provide feedback on each other's work. When Savannah launched a fair housing planning effort in 2016, they easily leveraged these existing relationships without needing to convene new bodies within government.

Addressing Collaboration Challenges

Collaborating with intragovernmental partners can lead to innovative goals that reflect a wide range of issues. However, it can also make goals more difficult to implement and track, especially if the partners involved don't maintain strong relationships. Holistic goals become impossible to realize if one or more partners withdraw their commitment to them.

When exploring collaboration opportunities, program participants should prioritize working with departments and organizations with which they already have strong relationships. These existing ties make it more likely that partners will collaborate effectively and maintain a commitment to the fair housing goals they establish. If you want to collaborate with a partner for the first time on a fair housing plan, invest time into developing a productive relationship built on common goals and values.

Completing a Unified Plan

When conducting fair housing planning, program participants can collaborate with other jurisdictions and public housing agencies to produce a multi-partner plan. Under this model, planners work together on public outreach, data analysis to craft goals that addresses their combined fair housing concerns. By pooling staff, resources, and knowledge from across organizations, unified efforts can make the planning process more efficient and thorough. While every program participant retains their individual obligation to affirmatively further fair housing, multi-partner plans can promote cooperative goal-setting that leads to broader housing solutions. For these reasons, HUD encourages jurisdictions to consider collaborating with other program participants when feasible.

Basics of Unified Planning

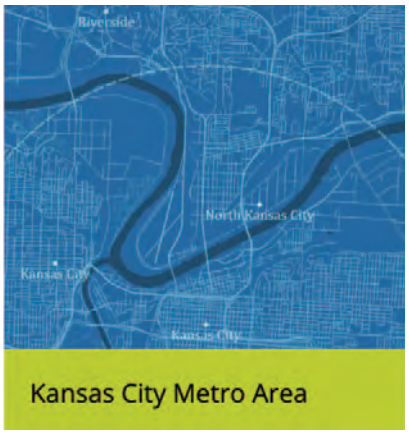
Unified planning brings together program participants who represent a larger area with shared housing needs. Every housing market encompasses multiple levels of government, and non-governmental entities, including cities, counties, and public housing agencies. However, fair housing issues often transcend these jurisdictional borders. Dynamics around affordability, segregation, transportation, and employment can present regional challenges. In most areas, there is no existing authority tasked with devising regional solutions to fair housing challenges. By completing a unified fair housing plan, program participants can remedy this gap and collaborate to address common concerns.

The number of entities that participate in a unified plan can range from two to dozens. Most commonly, program participants complete unified plans with PHAs that serve the same locality, often with identical boundaries. Unified plans can also include larger coalitions, such as a city and county, multiple cities, or even more expansive networks.

The following are examples of unified planning coalitions.

Kansas City Metro Area

Kansas City partnered with four neighboring cities and on both sides of the Missouri-Kansas border to complete their 2016 Assessment of Fair Housing.

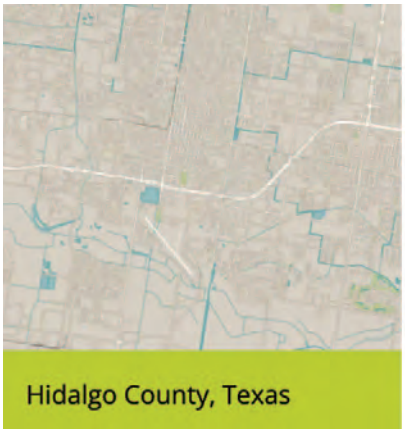


Burlington, VT

For their 2017 Assessment of Fair Housing, the city of Burlington partnered with the Burlington Housing Authority and the Winooski Housing Authority, who serve clients in and around Burlington.

Hidalgo, TX

In 2017, Hidalgo County partnered with its four most populous cities and fifteen public housing agencies to complete an Assessment of Fair Housing.



Each locality is still required to analyze impediments and barriers to fair housing within its borders and propose goals for addressing them. However, unified plan goals can apply to multiple jurisdictions and address issues that cut across local boundaries.

Benefits of Multi-Partner Planning

Unified plans can provide benefits over single-jurisdictional efforts, from making the planning process more achievable to deepening the scope and depth of analysis.

From a practical standpoint, **unified submissions amplify the manpower that you can dedicate to a fair housing plan**. Because outreach, data analysis, goal setting, and drafting demand months of effort, planning can strain staff who must fulfill other obligations simultaneously. Unified planning reduces this burden by splitting work across more staff and eliminating redundant efforts. For example, if three program participants complete separate plans, each must conduct separate

engagement campaigns and data analysis concerning similar populations. If the jurisdictions submit a unified plan, however, they can avoid redundancy and save time through a single outreach campaign and analysis process. Collaboration also allows program participants to focus on planning elements that match their strengths and resources. A city with a GIS specialist could lead the data analysis portion of a plan, while a partner county with dedicated engagement staff could direct outreach.

Besides making planning easier, **unified efforts can improve each dimension of the planning process**. Outreach becomes easier with more staff available to coordinate events. The more diverse data sets that cooperating program participants can produce enrich the analysis process. Collaborators can pool not only their staff power, but the unique authority they each possess. Fragmentation of authority can limit how local policymakers in different jurisdictions understand fair housing issues and the tools they have available for addressing them. However, you can bridge these divides through unified planning and make the full scope of local power available to address community concerns.

Explore examples below of how program participants have combined their resources and capabilities to enhance elements of a unified fair housing plan.

Community Participation

Many cities and counties have improved their community participation efforts with low-income residents by collaborating with PHAs. Federal regulations require PHAs to sponsor Resident Advisory Boards (RAB), which provide consistent feedback on public housing plans. Unified planning allows program participants to access the existing PHA infrastructure and engage with low-income residents who might otherwise be difficult to reach.

Combining Expertise

Because program participants administer different programs, their staff develop specialized expertise that may not cover the full range of issues and services in a housing market. Unified planning can prevent these gaps in knowledge from hindering analysis and goal setting. Delaware County, Pennsylvania, for instance, does not manage Housing Choice Vouchers (HCV), which are a pillar of the region's low-income housing strategy. When the county began its 2017 Assessment of Fair Housing, it decided to complete a multi-partner plan with the Delaware County Housing Authority (CDHA), which administers vouchers. By bringing DCHA voucher managers onto the planning team, Delaware County incorporated their expertise into affordable housing goals.

Policy Interventions

In Washtenaw County, Michigan, county officials have traditionally played the lead role in housing affordability planning, but city officials in Ann Arbor and Ypsilanti have more practical authority to influence implementation. When Washtenaw County, Ann Arbor, and Ypsilanti created a multi-partner Assessment of Fair Housing in 2017, they proposed leveraging the county's planning capacity to maintain an affordable housing inventory, which would help city planners make more informed affordability decisions.

Perhaps most importantly, **the broader perspectives and authority that come from unified planning can increase the scope and efficacy of fair housing goals**. As HUD's 2015 AFFH Guide noted, "a viable fair housing goal may require a regional approach." If an individual jurisdiction identifies an issue that transcends its borders during the planning process, it might not be capable of marshalling the resources and knowledge needed to address it meaningfully. In such cases, program participants often propose a goal to coordinate with other localities to find a solution. These vague objectives, however, rarely translate into action once a plan is submitted. Unified plans incorporate coordination into the planning process itself, allowing planners to set SMART goals that can lead to progress on regional issues. In implementing these goals, you can collaborate to pool resources just as in the planning process, increasing the manpower and authority that you can dedicate to them.

Unified Planning Process

Unified plans follow the same general procedures as any other fair housing plan. However, participants should be mindful of additional steps and challenges that may be necessary to complete the plan successfully and realize its potential.

Program participants should first consider if submitting a unified plan is right for them. **Given the benefits to quality and efficiency that unified plans provide, you should always aim to collaborate with their neighbors**. However, the value added by unified planning often depends on the strength of existing relationships. Program participants that complete the most successful unified plans usually have strong, well-tested relationships with their partners. Long-standing cooperation is not a prerequisite for a unified plan, but the familiarity and trust the come from existing relationships can avoid tensions and make the planning process smoother. When possible, you should foster cooperative ties even outside of planning cycles to increase the potential impact of unified efforts.

Challenge: Program Participants on Different Planning Schedules

Fair housing plans can be especially valuable when integrated into a five-year Consolidated Plan, informing its goals and priorities. However, you may struggle to organize a unified plan if neighboring program participants have a different timeline for their Consolidated Plans. If you want to complete a unified plan despite varying reporting schedules, contact HUD for specific guidance.

Regardless of any preexisting relationship, program participants that decide to collaborate should agree on a work plan before beginning the process. Formalizing timelines and responsibilities through a memorandum of understanding can preempt confusion or conflict and create a framework for mutual accountability. To structure the memo, jurisdictions can use the sample collaboration agreement that HUD provided in the **2015 AFFH guidebook** (page 216).

Once an agreement is established, public outreach and data analysis can proceed along agreed-upon terms. In general, each participant should play a role in every component of the plan but focus on areas where their strengths are concentrated. Planners should also be sure to share their housing data and collaborate to make it mutually comprehensible before data analysis begins.

Challenge: Maintaining Relationships amid Turnover

The productive relationships that make for effective unified plans are usually forged by individual staff members who develop ties with colleagues in other jurisdictions. But when staff depart for other jobs, these relationships often depart with them.

This loss can be particularly disruptive while preparing and implementing a unified plan, since it reduces mutual oversight and making coordination harder. You can minimize this risk by formalizing relationships through standing committees and collaboration agreements.

By systematizing collaboration and creating spaces to build cross-agency relationships as a group, the effect of staff turnover becomes less impactful.

While most elements of fair housing planning are identical between individual and unified plans, collaboration creates unique challenges and possibilities around goal setting. **Unified goals must balance an overall vision for regional change with the need to address specific issues at a local level.** Each partner is still responsible for affirmatively furthering fair housing, so problems identified within one jurisdiction cannot be subsumed into a larger framework with a clear plan for local action.

While somewhat more challenging to coordinate, unified plans make it easier to effect regional change and address housing barriers that transcend each participant's boundaries. For these reasons, most program participants who have completed unified plans recommend that others implement them as well.

Program participants should set goals that address fair housing issues in their shared area, and then create metrics that divide the responsibility of implementing them based on the capacity and authority of each partner. Successful plans connect goals to specific local strengths, just as in the planning process. For instance, a city with a robust zoning department could work to change land use policies to encourage development in a certain neighborhood, while a county could enact property tax incentives in the neighborhood to advance the same goal.

Unified plan goals have the potential to affect broader and deeper change than individual efforts, but they also require more coordination to implement. Diffusion of responsibility can make it difficult to ensure accountability, and a loss of commitment by any one collaborator can imperil goals that require ongoing cooperation. You can avoid these issues by creating mechanisms for mutual oversight during the planning process. You can form an oversight committee staffed by representatives of each partner and create standard practices for tracking data about progress. It is much easier to establish these practices before implementation begins than to create them once partners have already established different procedures for monitoring their work.

Cultivating Support from Government and Elected Officials

Successful implementation of fair housing goals often relies on robust support from government and elected officials. While fair housing planning is typically led by a government agency, such as a community development agency, and the plan is ultimately approved by elected officials, it may be beneficial to engage a broader group of government officials and engage elected officials in the development of the plan. To increase the likelihood that fair housing goals are enacted and implemented, welcome these leaders into the planning process and cultivate their commitment to addressing fair housing barriers. Staff and fair housing advocates can employ various strategies to strengthen government support for fair housing initiatives.

Government Engagement in Fair Housing Planning

There are two primary dimensions to government engagement in the fair housing planning process:

Convincing government and elected officials of the value and importance of fair housing planning. Leveraging their support to eliminate barriers to fair housing goals and to secure or leverage the resources needed to do so.

Fair housing planning often requires program participants to confront existing inequities and thus requires strong and trusted leadership to navigate. Government and elected officials are critical in addressing conflicts that may arise from exposing disparities. At the same time, they play an important role in instilling community trust. However, fostering a commitment among government leaders to eliminating fair housing barriers can be an equally difficult process.

Encouraging Government and Elected Officials' Support for Fair Housing Planning

Raising awareness of the fair housing planning process and its benefits can draw the interest of government and elected officials. Expand the following sections to learn about ways to cultivate their interest in fair housing.

Encouraging Elected Officials to Attend Fair Housing Events

Raising awareness of fair housing issues among elected officials is an important step in fair housing planning. Government staff and housing advocates can encourage elected officials to attend fair housing trainings to understand the requirements of complying with the Fair Housing Act, as well as the steps involved in fair housing planning and implementation.

Localizing Fair Housing Planning

HUD program participants have shared that when government and elected officials have a deeper understanding of fair housing, they can allay fears that fair housing planning is a threat to

state or local control. Since plans should be tailored to specific community needs, they can improve local policy making instead of being a procedural imposition.

The Impact of Data

Data can be a powerful tool to present the realities of housing disparities to local leaders. HUD program participants have reported positive responses to fair housing concerns when elected officials can see clear visual evidence of housing disparities and segregation in the form of numbers and maps. Combining numerical data with stories and experiences from people who face barriers to fair housing can be a powerful way to inspire commitment. By "humanizing data," it is easier to bridge the distance between abstract concerns and the realities of their impact on people's everyday lives.

Explore Opportunities for PHA and Entitlement Coordination

Coordination between PHAs and entitlement jurisdictions can help with fair housing planning and strengthen governmental and community support for actions that address barriers to fair housing. The two entities may elect to work on a fair housing planning process together, in which case they may be able to share data and staff resources to develop a more robust set of goals. A PHA may be able to coordinate on public outreach to or share information it has about the needs of vulnerable residents, which can help built support for solutions to address those needs. PHAs may articulate fair housing planning in their strategic or annual plans. PHAs may also be able to provide resources for fair housing activities, such as the development of city- or county-funded affordable housing on PHA land, which may make such projects more viable.

Coordination between PHAs and entitlement jurisdictions can help identify other needed infrastructure and services that can make relocating to a new area easier. While transit access, neighborhood amenities, and access to employment may improve, coordination between PHAs and entitlement jurisdictions may be needed to address issues like childcare, access to spiritual and cultural centers, and foods. Yet another opportunity is for PHAs to help elected officials in expanding the area's ability to address fair housing barriers, such as by building a coalition to pass a source of income discrimination laws or advocating for a city or county's support in developing or securing affordable units in resource-rich neighborhoods. PHAs may also have properties that anchor Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs). Entitlement jurisdictions can coordinate with PHAs for both place-based strategies to invest in neighborhood amenities in and around PHA properties in R/ECAPs and assist with addressing barriers to mobility strategies, such as landlords that discriminate against voucher holders or charge exorbitant and nonrefundable fees that may prohibit PHA participants from accessing housing throughout the area.

Representing Diverse Needs From Different Groups of Constituents

Sometimes government and elected officials' perception of what is well-received in their communities is based on the "loudest" voices in the community. When specific interest groups loudly oppose certain policies, their opinion might be mistaken for broader community sentiment.

Ensuring that there is a diverse representation of people will help government and elected officials recognize that taking steps to further fair housing may be supported by a broad swath of community members.

Connecting Fair Housing Priorities and Political Causes

Connecting fair housing issues to broader community interests such as economic development, health, and education can help obtain community buy-in. Program participants share that public-private partnerships are often received well in communities that were largely opposed to fair housing planning. They also report that elected leaders were more committed to fair housing goals when they combined employment and housing objectives together.

Leveraging Government Support to Further Fair Housing Goals

Once government and elected officials understand the importance of fair housing planning, you can translate their support into direct action. Below, you can learn about effective ways that program participants have leveraged the support of government leaders to bolster their fair housing plans.

Request support from government and elected officials during the community participation process

Asking government and elected officials for assistance in leveraging their networks can help improve participation from underrepresented groups in community participation processes. Local leaders can help reach community members who have been historically excluded from decision-making processes, many of whom bear the brunt of barriers to fair housing. Involving government and elected leaders also gives the effort greater visibility and signals government commitment to taking meaningful action. To convince government and elected officials to participate, you can stress that it gives them a chance to connect with diverse voices in their constituency and learn about their concerns.

Encourage government and elected officials to introduce discussion of fair housing planning at public hearings

Elevating concerns raised through fair housing planning into public hearings and meetings can build community awareness and encourage government accountability. Some program participants have found that publicizing the fair housing planning process through meetings emphasizes its relevance and ensures that goals are aligned with other local initiatives.

Regularly provide government and elected leaders with talking points and updates

Engaging regularly with government and elected officials and updating them on fair housing achievements can be an effective strategy for securing their continued support. Some program participants say that elected officials take pride in the locality's fair housing initiatives and often refer to them in touting the community's progress.

Recruit government and elected officials to serve on a fair housing planning advisory committee

Program participants have found that, without necessary government support, fair housing implementation founder regardless of how effectively goals were set. Since most effective approaches to fair housing often require integrated and comprehensive action involving a variety of local actors, such as school boards, housing, and transportation agencies, the engagement of government and elected officials is crucial to holding these diverse actors accountable. To achieve this level of support, some program participants recruit government elected officials to their fair housing planning advisory committees to harness their power to support an integrated approach.

Request resources to achieve fair housing goals

Implementing strategies to achieve fair housing goals may require additional resources, like more staff time to implement a new program or to communicate with community members more regularly about potential barriers to fair housing. Reach out to government and elected officials early in the planning process to explain the types of resources that may be needed to mitigate fair housing barriers and ask for their help identifying resources that are available. Stay in touch with those officials as goals and implementation strategies are developed to ensure that goals can realistically be achieved.

Example: Building Legitimacy in Nashville

When Nashville began a fair housing planning process in 2016, many community members seemed reluctant to participate because they assumed any resulting plan would be shelved by local elected officials. To challenge this idea, Nashville planners worked extensively with city council members, particularly those representing R/ECAPs. Their efforts helped convince hesitant community members that the city government was committed to addressing fair housing issues. The process also cultivated support for implementing goals presented in the plan.

Additional Resources

- The **Campaign for Fair Housing Elements** is a California based housing coalition that works to help localities include fair housing considerations and policy approaches to their Housing elements. They offer many resources, including advocacy letters to localities and government and elected officials.

- This **fair housing guide for local governments**, developed by the Housing Equality Center of Pennsylvania offers strategies that local governments can employ for increasing fair housing choice for residents and constituents.

- The Institute for Local Government created the **Building Public Support for Affordable Housing** in 2007. Though it is designed for jurisdictions in California, its lessons can be applied to other localities.

Engaging the Public

Inclusive public participation is central to fair housing planning. **Any analysis of fair housing issues in your community should be informed by community input collected through the community participation process**. Providing meaningful opportunities for the public and local partners, particularly those representing members of protected characteristics and/or those typically considered to be underserved in your community, to offer critical input throughout the planning process can uncover nuances that are often invisible in higher-level data. In addition, it can result in the creation of fair housing goals that directly address issues identified by community members and foster lasting partnerships that can help meet those goals.

HUD program participants often spend a lot of time and effort creating surveys, conducting public meetings, and reaching out to stakeholders, but are disappointed by the small amount of meaningful community input they receive. Given the time and effort that goes into community participation, these results are frustrating and hinder the ability of program participants to incorporate diverse perspectives into their plans and strategies. A well-informed community is essential to a robust community participation process – otherwise, the only issues that program participants will hear about are immediate complaints over topics like substandard housing conditions and high rents.

Ultimately, a community participation process is a two-way street. Community members may not fully understand the history of segregation and disinvestment in their community, or the extent of racial disparities in access to opportunity, and they may be unfamiliar with all the tools available to remedy these problems.

In the section, you will learn about

- Structuring and executing a comprehensive community participation process
- Cultivating community relationships and support for the fair housing planning process
- Facilitating input from traditionally underrepresented groups
- Collaborating with local organizations to broaden outreach efforts

Engaging the General Public

Keep in mind that community participation should be an ongoing activity throughout the fair housing planning process, with multiple opportunities to share their perspectives and to provide input on later stages of the process, such as when goals are being developed or the final report is being drafted.

Prior to conducting outreach and engaging your community, you should complete some preliminary data analysis to identify information gaps and to assess fair housing issues to be explored during the community participation process. Start by conducting a preliminary analysis that includes a review of available data, maps, and prior studies to glean initial findings about fair housing issues in your community. More specific details on data collection and analysis are covered in the sections **Collecting Data** and **Analyzing Data**.

Community knowledge can fill gaps and answer questions that quantitative data alone may not be able to resolve. Throughout the community participation process, you can revisit your preliminary analysis and adjust findings based on the additional knowledge gained through community discussions.

Once you have conducted your preliminary analysis and identified issues that need further exploration, you can determine which stakeholder groups or individuals to engage. These may be businesses, institutions, nonprofit organizations, neighborhood groups, or members of specific protected classes. You can use initial findings from the preliminary analysis to guide your discussions with these groups.

Your initial findings can also determine the level at which to engage community stakeholders. Different stakeholders will be suited for different levels of engagement. Some may direct you to additional community partners that can help complete your understanding of an issue. You may want others to become a strategic partner in solving an issue. Consider at the outset how you would like different organizations to contribute to the planning process so you can know how and when to engage them.

Of course, as you get to know different stakeholders, and especially those with whom you may not have had a prior relationship, your ideas on how they can contribute will evolve.

Possible Community Participation Partners Include:

- Public Housing Resident and Program Participant Councils
- Fair Housing, Legal Aid, and Tenant Advocacy Groups
- Reentry Services
- Neighborhood Associations
- Disability, LGBTQIA, Gender Equity, and Other Advocacy Groups
- Lending and Financial Institutions
- Domestic Violence Organizations
- Local and/or Regional Businesses, Networks, and Chambers of Commerce
- Schools, Colleges, and Universities
- Housing Developers, Property Managers, and Landlords
- Real Estate Agents and Associations
- Transportation Groups
- Food Banks
- Racial Equity, Civil Rights, and Social Justice Organizations
- Labor Unions
- Workforce Development Organizations
- Senior or Elderly Centers and Commissions
- Homeless Assistance Organizations
- Community Foundations
- Family and Children Service Providers
- Churches and Faith-based Organizations
- PHAs, Elected Officials and Other Government Agencies
- Community members such as underrepresented or marginalized groups, which may include communities of color, persons with disabilities, non-prominent religious communities, LEP-speaking individuals and related interpreters, and those in racially or ethnically concentrated areas of poverty (R/ECAPs)

Conducting a Community Participation Process

A community participation process can take a long time to do well, so start as soon into your fair housing planning process as possible, including planning events and recruiting partners. Program participants often note that they could not realize the full potential of community participation because they did not budget enough time to plan, conduct, and analyze an effective process.

Your community participation approach should center on creating meaningful meetings, events, and outreach that build trust and create partnerships. Having dedicated outreach staff can help HUD program participants foster deeper and lasting relationships with stakeholders and community groups, making it much easier to gain input during a fair housing analysis process.

Example: Community Outreach in Winston-Salem

The City of Winston-Salem employs Community Assistant Liaisons, who work for city council members as their "eyes" in the community. When the city began work on an AFH plan, they tasked the liaisons with spreading the word through door-to-door canvassing and coalition building with neighborhood organizations. The city's Community Development department also employs engagement staff who contributed to this awareness-building effort.

If you are unable to dedicate staff to conducting a community participation process and following-up with the community, consider providing small grants to community organizations to help facilitate this process.

When preparing to begin your community participation process, ask yourself these questions to help define the purpose of each activity:

- **Who** are your participants? What is their experience and background? What expertise can they contribute?
- **Why** are you engaging with this group? Is your primary aim to identify fair housing impediments? To gain a deeper understanding of resident experiences? To problem solve and design solutions together?
- **At what level** do you plan to engage with this group? Are you collecting data or perspectives? Will they be a strategic partner or perhaps part of an advisory group?
- **How** will the information they provide be used?
- **What** modality will you use to provide equitable opportunities and gather inclusive community input? Will input be gathered through online/hard copy surveys, focus groups, or public meetings, or all of the above?

Setting Team Roles

In addition to the questions above, it is essential to determine ahead of time what roles each of your staff or team members will play during community participation events. When establishing roles, it is important for people to acknowledge their strengths and weaknesses in conducting community participation activities. Those with stronger conflict mediation skills may serve as moderators or facilitators. Others may be strong note-takers or be adept at speaking one-on-one with participants. Regardless of the role, everyone should be prepared to listen and allow community members to influence the direction of the conversation.

At least three roles should be identified ahead of time:
1. **Moderator** to lead the session.
2. **Note-taker** to document the meeting in writing.
3. **Facilitator** to walk the room, take photographs (with permission), encourage participation, monitor the tone of the room, and bring any participant issues to the attention of the moderator.

When preparing for community participation, **it can be helpful for staff and facilitators to reflect on how their socio-economic background influences how they experience the world and view fair housing issues.** Self-reflection often results in greater awareness and sensitivity, strengthening one's ability to connect with diverse community participants.

Consider the multitude of experiences in your community and reflect on the positioning of your community participants. Who are they? What are their histories? What experiences, burdens, and expertise might they bring to the meeting? Recognize that you are not the only expert in the room and be prepared to listen and learn.

Example: Letting Others Lead Outreach in Hamilton, OH

At the start of their planning process for a 2016 Assessment of Fair Housing, staff in Hamilton, Ohio recognized that their local government was distrusted by large segments of the local population. In particular, Hispanic residents had faced historic discrimination from the city and were broadly suspicious about government involvement in their community. To avoid this obstacle, Hamilton staff recruited non-city employees to seek feedback from Hispanic residents, which revealed important insight about this population that might have been missed otherwise.

It is important to remember that a community participation process is just as much about the public's concerns and goals as it is yours. Prior to the engagement, participants should be informed of the purpose of the meeting or event and how information they provide will be used.

Selecting Community Participation Methods

There are a variety of activities to encourage community participation in the fair housing planning process. Some community members will be more responsive to particular modes of outreach than others, and different modalities are better suited for gathering different types of information. For example, surveys are good for gathering information from many people at one time, but interviews or focus groups are better for gaining a deeper or more nuanced understanding from a small number of individuals.

Always design community participation activities from a starting point of a clearly defined question or set of questions — your preliminary data analysis can help you come up with them. Then, design the activity — be it a survey or interview or discussion questions — to collect the information needed to answer these questions.

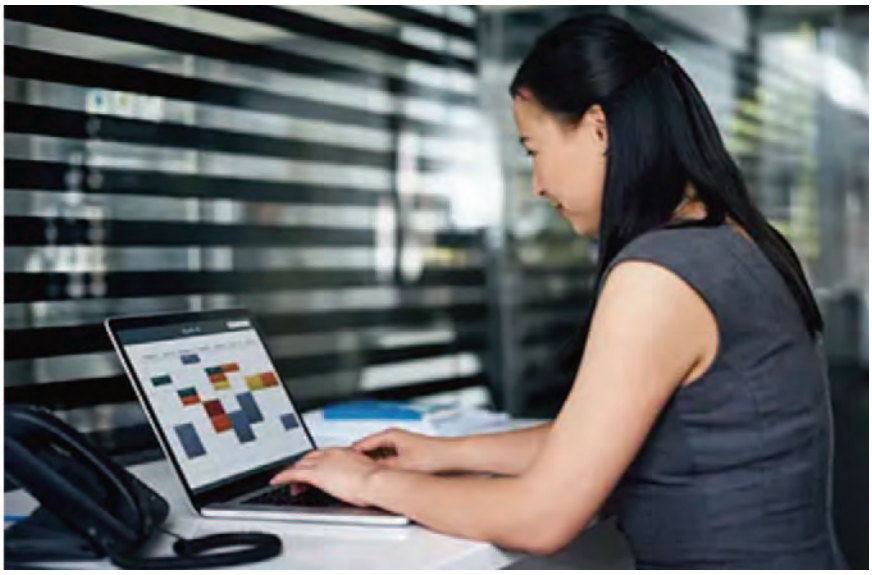
When determining what type of activities to conduct, focus on offering a variety of opportunities that will allow a diverse group of participants to be involved. When possible, you should **attempt as many different forms of outreach as possible** to attract a cross-section of constituents, some of whom might be excluded by a more targeted approach.

For details on how to specifically design surveys, interviews, and focus groups, see the next section.

Set meeting times and locations to be accessible to target populations. Be sure to set events at a variety of times and locations to ensure those working during the day or in the evenings or weekends can engage. Consider doing direct outreach to residents using preexisting mailing lists, such as those of public housing agency residents or Housing Choice Voucher participants, or those receiving agency-

supported transportation assistance for disability-related needs. If possible, provide transportation to in-person meetings for individuals who cannot easily attend them on their own.

You can also consider incorporating community participation activities into existing events in the community where you know residents will be, rather than asking them to attend separate events. Set up a table with surveys at little league game or ask residents for a moment of their time at a wellness fair. You can also drop off promotional materials at community events and institutions that direct people to your planning effort's website.



Many program participants report drawing attention to community participation efforts by entering survey respondents and/or event attendees into a drawing for gift cards. Free food is also powerful enticement, and it can make it easier for community members to attend events held during dinner hours. Offering free child care can also make meetings more accessible. Because it may not be possible to cover the cost of food, childcare, or prizes with HUD funds, consider partnering with local organizations and/or funders to help cover related costs.

The following table summarizes common methods for conducting community participation, and highlights of the advantages and common pitfalls of each approach.

Method	Description	Advantages	Common Pitfalls
Project Website	Websites where staff can share and community members can respond to project information	• Can be used to chart project progress • Effective way to share maps and data	Relying on websites alone can exclude less tech-savvy residents
Social Media	Online applications that enable community members to share and respond to project content	• Raises awareness of other efforts • Effective way to promote events	Relying on social media alone can exclude less tech-savvy residents and those who don't engage with social media

continued

Method	Description	Advantages	Common Pitfalls
"Pop Up" Event	Events that are unexpectedly hosted in the community; often involve a temporary location or exhibit, such as street festivals or community fairs	• Nimble and flexible • Takes the participation activity to the people • Low budget and high impact activity	• No follow-up or way to engage attendees later • Language inaccessibility
Open House	Public events where community members receive and respond to information from exhibits and staff, such as at City Hall or a local library	• Casual and approachable environment • Opportunity to include interactive activities	• Poor choice of/ inaccessible locations • Poor choice of day and/or time
Town Hall	Public events where speakers present on data and fair housing planning; residents given an allotted amount of time to provide comments	• Can be structured to allow many residents to provide short comments • Provides open forum that can be formal or informal in tone	• Not using plain language to present reason for the town hall, leading to off-topic discussion or comments

Best Practices

No matter the objective of the meeting or event you're planning, from gathering feedback to strategizing as partners, the following tips can help you gather meaningful feedback from a diverse array of constituents.

Set Ground Rules

At the beginning of the meeting, set basic ground rules about respectful listening and speaking practices. When feasible, allow participants to contribute their own recommendations for rules.

Empower Participants with Information

Provide enough context and information about the fair housing planning process and purpose of the activity so that participants feel empowered and able to contribute in a meaningful way. Use plain language and provide brief, direct information. For example, for a discussion of fair housing solutions, provide an overview and examples that demonstrate how strategies can use policies, programs, and partnerships to effect change.

Offer Conversation Starters

Fair housing planning topics may seem abstract to participants who aren't familiar with planning language. Be prepared to open the conversation with some examples or prompts of your own. Through examples, try to make the topics relatable. Instead of asking, "Is transportation access an issue in your community?" ask "Do you have difficulty getting to work? Do you know people who do?"

Provide Multiple Mediums for Feedback

While a large public forum is a common community participation method, it can be intimidating for some and may provide an opportunity for a vocal minority to overtake the session. To address this challenge, give a variety of avenues for feedback. Participants might prefer to engage via smaller breakout groups, share written feedback, or even leave audio recordings of their stories. Giving participants multiple channels also may help people with physical disabilities, intellectual limitations, or limited English proficiency participate more easily in activities.

Use Visual Tools Liberally

Visual tools are excellent for supporting community participation discussions. When used effectively, they can communicate a lot of information quickly and accessibly. Have copies of the meeting agenda and handouts readily available for people to familiarize themselves with upon entry. Create graphics to illustrate concepts and have them available in large formats or as handouts so people can easily read them. Create visuals in the moment by documenting the session on a whiteboard or large poster. Share maps that highlight relevant fair housing challenges or concerns.

Facilitate and Educate

Throughout the session, the moderator should look for opportunities to build knowledge among the group. Design activities and facilitate discussions so people can share their diverse perspectives and be heard. Sometimes, these perspectives can be difficult to balance in a group. See the heading "Making the Most of Conflict" for guidance on how to treat these imbalances as opportunities for growth and learning.

Be an Attentive Facilitator

An attentive facilitator continually reads the room and responds in real time to mediate points of conflict and identify points of consensus that move the discussion forward. Check in regularly for questions and comments throughout the session; and if a person looks confused, offer an explanation, and then follow up on their understanding. If it seems like the meeting is not progressing well or the content is not resonating with the participants, it might be necessary to redesign the meeting on-the-spot. It is always helpful to have a back-up plan.

Leverage Local Organizations and Partners

Local organizations or partners can take the lead or provide significant support to outreach efforts. Hosting forums without representation from your agency may allow for more open,

honest discourse. In the past, HUD program participants have partnered directly with trusted fair housing centers to facilitate the community participation process. Others have divided the process by geography and subject and partnered with several nonprofits, each of which dedicated their efforts to a single subject area.

Making the Most of Conflict

While there are extensive benefits to community participation, some conversations can be difficult to navigate. This is particularly true around controversial topics with deeply personal impacts, such as fair housing.

During the planning process, there will likely be community members who speak to discrimination they have encountered because of past and present practices and policies. While some of these comments may not relate to you or your agency, it is important to understand that members of the community sometimes experience government as a singular entity and distinctions between different governmental actors may feel meaningless or inconsequential to them.

To help build a trusting relationship with the community and lay the groundwork for deeper exploration of fair housing issues, it is important to acknowledge any past wrongdoings and recognize the ways that discriminatory policies deeply impact people's lives. When leading discussions, allow room for conflict to surface and acknowledge people's struggles openly and sincerely.

To navigate difficult conversations with a diverse group of participants, focus on shared values, like equal opportunity and fairness, or common goals. The moderator can even conduct an initial grounding exercise to identify these areas of common ground. Reaching agreement that people want some of the same things in their community – safety, good schools, green space – can be a powerful point of reference to return to during the session. You may find that participants in your meeting are focused on immediate personal issues and priorities rather than those of the community. Relate their issues to those of the community by asking if others have experienced similar issues.

It is helpful to avoid framing issues as either/or choices. Despite the all-too-common fear of change, reassure participants that removing impediments to fair housing is not about taking from one community to give to another. Rather, strategies focus on opportunities to find balance and improve the standard of living for everyone.

Remember, community participation is an iterative process. You may leave an individual session feeling that you've left many things unresolved, and you'll probably be right! Focus on incremental progress and how the takeaways from each session contribute as a whole to a deeper understanding of fair housing issues and solutions.

Winding Down Community Outreach

Community participation is an ongoing and iterative process, and ideally one that extends beyond the timeline of a specific fair housing planning process. Community participation can be helpful, for example, not only to setting goals during a planning process, but also to evaluating and refining the implementation of fair housing strategies designed to help achieve the goals.

Nevertheless, it can be helpful in a timebound fair housing planning process to determine when you have received enough information from the community to inform your planning efforts. At the outset of the participation process, you should set goals according to the types of information you would like to collect and from whom.

The real measure of a successful community participation process is not when specific quantifiable goals have been reached, such as the number of people who have attended a meeting. Instead, it is when you have reached the point of "saturation", meaning you can clearly identify a set of themes and very little new or surprising information is surfacing from additional data collection.

It may be time to wind down your intensive outreach and participation process once you have:

1. Met with a broad and representative range of community groups and organizations
2. Reached the point when you are no longer collecting new information from additional community participation

If at the conclusion of your community participation process you realize that you have left out a group or wished you had more time to talk to a particular stakeholder, carry forward those activities into the implementation of your fair housing plan by incorporating engagement activities into your overall strategy. This may be done by having a specific goal to reach out to a particular group or by having periodic meetings with the community or organizations to check in on fair housing issues and strategies during the course of implementation.

Think of your fair housing community participation process as the beginning of a conversation, one that you will come back to again and again and be sure to build in ways to stay connected with the community after the planning process is over.

Following Up with the Community

A community participation process is not over once you have completed an initial round of outreach. Once you have used the information you acquired to set goals, reach back out to community members to facilitate their feedback on your goals. This outreach can be done similarly to the initial engagement you had with each group, or it can look like sending notice to all who engaged that the draft goals and strategies are ready for review. Like before, you should provide multiple ways that residents can provide comments. Regardless of the method of outreach, it is important to **ensure that residents will have the opportunity to provide input that will be meaningfully incorporated into the document prior to the final plan.**

Once the community participation process has wound down, **direct follow up with community groups and members can help to cement the partnership and trust you have worked to build.** For example, a thank you email can be sent to all participants that includes notification that the fair housing plans have been published. The email can outline the value added through community participation, in particular how the process influenced goals and strategies, and communicate ways that the community can assist in furthering fair housing in the future.

Extending an invitation to stay involved helps to sustain partnerships formed during the fair housing planning process and may bridge divides between government entities and protected classes within the community. Below are some ways that you can encourage community groups and individuals to remain involved. Some suggestions are more limited in scope than others, but each provides opportunities for the community to stay involved in a meaningful and constructive way.

Continuing Community Participation: Short-Term

Continuing Community Participation: Short Term

Consider these optional follow up activities:

1. Solicit comments on fair housing planning updates via social media and your agency's website.
2. Invite people to attend additional events conducted by your agency, including fair housing trainings and fair housing month events.
3. Ask for feedback on the strengths and weaknesses of your community participation process through a follow up survey.
4. Collect names of groups and individuals that should be invited to participate in future activities.

Continuing Community Participation: Long-Term

Continuing Community Participation: Long Term

Consider these optional follow up activities:

1. Invite people to serve on existing committees that need community membership. If any ad hoc committees formed through the planning process transition into standing committees, extend offers to serve on them.
2. Invite people to participate in fair housing conferences or trainings as presenters, co-planners, facilitators, etc.
3, Establish a group that monitors the progress of fair housing goals and strategies.

You can also be explicit in recognizing public input and comments. For instance, when preparing an Assessment of Fair Housing, Nashville committed to including every comment they received verbatim in an appendix to their planning document. This helped residents feel that their input mattered and would become part of the project, no matter what.

In addition to following up with community groups and organizations, your agency should **complete an internal review to identify how community participation results can be integrated into other programs**. When conducting a community participation process, there may be findings that can be utilized elsewhere in your department or agency. For example, you may discover that language barriers are preventing people from accessing home repair programs. In these instances, you can work with appropriate departments to ensure those findings are acknowledged and addressed.

When findings fall outside your agency's purview, staff should seek out the appropriate government entities and share those findings. This may involve forwarding comments or providing formal presentations to government partners on the findings. For example, if your analysis shows that criteria in the State's Qualified Allocation Plan result in concentrations of subsidized housing in Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs), you should present those findings to the appropriate state agency.

It is important to note that not all community feedback warrants this level of follow up. Be sure to calibrate your effort to the significance of the issue. If you find patterns or consistent issues, be sure to bring them to the attention of the appropriate entity. Also, **be sure to share with the community how their concerns will be addressed** and how they can follow up with relevant departments and agencies if needed.

At the conclusion of the community participation process, think through the strengths and weaknesses of the activities you used and how effective outreach efforts were in ensuring a diverse range of community members participated. There are lessons to be learned from every community participation process and you should seek to incorporate those lessons into future efforts.

Targeting Hard-to-Reach Groups

It is important to target fair housing planning, education, and engagement efforts to reach specific populations that are traditionally more difficult to reach. These include communities of color, immigrant groups, families with children, people experiencing homelessness, people with disabilities, and other groups representative of protected classes.

Often, HUD program participants have stakeholders they readily communicate with and consistently involve in a community participation process. Maintaining these connections is critical. However, you should also look for opportunities to connect with groups you do not routinely speak with and populations who may be more affected by fair housing issues than others.

Have we engaged this group before?

If they have not generally been involved in your department or agency's community participation activities before, invite them to participate in the fair housing planning process. For groups that may not be familiar with the process, a phone call or personalized email invitation to participate in a specific event may help establish a connection and motivate them to participate.

Do we struggle with getting feedback from or collaborating with this group?

If you have received limited feedback from the group, or have struggled with partnering in the past, you should still to try to engage them. Reach out to trusted associations or organizations who might be able to facilitate a connection. Some of these entities may include service providers, neighborhood groups, and religious and cultural organizations. It is important that you go to community members rather than expecting them to come to you. You can do this by attending meetings held by the trusted organizations and participating in neighborhood-sponsored activities such as fairs or farmers markets. Also, be sure to have multilingual materials available when needed.

Have we explicitly addressed this group's concerns in previous fair housing planning efforts?

For groups you have worked with in the past, check in with them to learn about results — what is working and what is not — and to assess how their needs may have changed and what you could be doing differently. Ask them for ideas about how to effectively involve other groups, especially those you have not successfully involved in community participation activities in the past.

Use your preliminary data analysis to help you select populations to engage, with the understanding that many groups representing protected classes may be missing from your data analysis. You can also use the list in the previous module as a starting point in determining groups to engage that might not have been previously involved in the fair housing planning process. When going through this list, it may

help to review the following questions to determine which groups to include and how you might engage with them.

Once you've created the list of organizations you will engage and have formulated a plan, take a step back and ask, "Who did we miss?" Fill in any gaps and integrate those groups into your plan.

As you begin to engage the groups you've identified, you will likely learn about other organizations or population groups you may wish to talk with. Be sure to ask the groups you are engaging with for advice and help in making these connections.

Best Practices for Contacting Hard-to-Reach Groups

- **Translate materials into all applicable languages**. Utilize community partners that fluently speak the language of the audience you are trying to engage and prep them on the discussion to ensure that higher-level ideas and concepts can be accurately translated.
- **Send outreach materials based on contact lists for existing programs** that benefit target groups, for example, PHA resident lists or resident associations.
- It is uniquely important when dealing with non-English speaking populations to **routinize outreach**, which helps overcome structural barriers to engagement.
- **Delegate outreach responsibilities to local community leaders** who can take the lead in coordinating engagement within their own spaces. For instance, some program participants pay local leaders for conducting outreach. Others have relied on non-governmental partners to coordinate with particular communities that may not trust local government, for instance, undocumented immigrants.
- **Smaller focus groups**, such as those with formerly incarcerated residents, can also be useful in reaching marginalized communities.

Rural communities face a unique set of challenges in conducting community participation activities, both practical and ideological. Vary the times and format of engagement meetings (during and after the workday, hybrid options) and consider minimizing the role of government entities in leading them in favor of trusted local officials and groups.

Having consultants or community groups lead activities can avoid cumbersome requirements, for instance, that meetings be held in a government building, or that prohibit food or gifts from being provided to participants.

Partnering with Non-Governmental Organizations

As mentioned throughout previous modules, non-governmental organizations and interest groups can be important partners in the fair housing planning process. **HUD program participants can benefit from building connections with diverse actors in furthering fair housing goals**, such as fair housing advocates, real estate professionals, landlords, employers, healthcare providers, universities and other schools, transit agencies, FHIP organizations, and other organizations that represent protected classes and hard-to-reach populations.

When thinking about whom to include your planning process, consider providing funding to compensate community groups for their time. For instance, HUD program participants that worked hand in hand with local fair housing groups reported stronger community participation processes and improved planning outcomes. However, in cases where fair housing groups were provided with funding for participation, community groups were more involved directly in the planning process, improving the overall process further. If federal funds are restricted, you can work with local community foundations or other partners to provide compensation to community groups for their time where available.

In addition, **involve community groups both during and after the planning process** to ensure that groups, and the residents they represent, can provide input on implementation of fair housing goals. While most HUD program participants include community groups in the fair housing planning process, few follow up with those groups to maintain relationships after the plan is completed. This makes it difficult for community groups to be involved in the part of the process that ultimately matters the most: implementing goals and translating proposals into real-world progress. Including community groups in the implementation process also enables deeper accountability which can help local policymakers remain committed to their goals.

Create a steering committee

Create a steering committee

Because participation of all stakeholders in every planning step is not feasible, program participants can create a smaller steering committee. It may include city officials, consultants, and representatives from the PHA and local interest groups. This smaller body can be involved in every phase of fair housing effort.

Engage lots of different community partners early to get many perspectives on the table

Engage lots of different community partners early to get many perspectives on the table

HUD program participants can work through local leaders and organizations that serve diverse communities and underrepresented groups, including persons with disabilities and individuals of limited English proficiency (LEP). These partners can help illuminate existing fair housing challenges and strategies for addressing them. Including groups early in the planning process can also bolster wider community engagement. Program participants can especially benefit from partnering with organizations that address HEAT issues (healthcare, education, environment, access to food, and transportation).

Emphasize how collaboration can benefit community partners

Emphasize how collaboration can benefit community partners

Local organizations are more likely to participate in fair housing planning if they believe they can benefit directly from it as well. Successful program participants have mentioned that framing planning as a chance for groups to enact their vision for change makes requests for feedback seem less like asks and more like opportunities.

Have dedicated outreach staff

Have dedicated outreach staff

Outreach staff can help HUD program participants foster deeper, longer-lasting relationships with stakeholder organizations and community groups — making it much easier to gather input during fair housing planning.

Have a third-party partner help with stakeholder engagement

Have a third-party partner help with stakeholder engagement

Having an outside group (either a consultant or another partner) handle community participation activities with stakeholders reduces the risk of only hearing positive feedback from groups that might fear upsetting their funders.

Maintain contact with organizations even after the fair housing planning process is complete to request ongoing feedback

Maintain contact with organizations even after the fair housing planning process is complete to request ongoing feedback

Ongoing community participation activities can help HUD program participants create an additional source of continuity and accountability. It can take the form of a standing local housing coalition, a similar persisting group, or something else. Follow-ups with organizations that participated in the planning process can help cement partnerships, elicit ongoing feedback, track progress toward shared goals, and identify changes that may need to be made over time to implementation.

Collecting Data

Successful fair housing plans are data-driven. Their goals are informed by evidence-based observations about a community and its residents. But data do not appear instantly or speak for themselves. Program participants must collect and effectively analyze data to reach conclusions that can shape fair housing goals and actions.

This section outlines best practices for gathering and processing fair housing data. It describes **how to access existing data sources**, as well as techniques that you can apply to collect new data from your community. Approaches to data analysis are covered in the next section.

As with intragovernmental collaboration and community participation activities, program participants that think more broadly and inclusively about data to produce better fair housing plans. You should strive to gather as much relevant data as possible to understand the full scope of local housing challenges. **The more you know about fair housing barriers, the more you can do to effectively address their causes.**

This section provides information on the types of data and data collection techniques that are available to help program participants as they conduct fair housing planning. Data covered in this section include pre-packaged data available from HUD, the Census Bureau, and other organizations, as well as data that program participants can collect on their own. To ensure that fair housing planning is supported by data that are comprehensive, timely, and informed by local context, you should consider using a wide variety of data sources in your planning efforts. Ultimately, these data should be used to identify barriers to fair housing and generate data-driven community conversations to inform fair housing goals.

In this section, you will learn about:

- Different types of data and data collection techniques that can be used in fair housing planning
- Strengths and weaknesses of using these data for fair housing planning
- Which data may be most useful in fair housing planning
- How to gather these data for use in the planning process

Select a following topic to learn more about collecting data:

Secondary Data Collection

To conduct fair housing planning, you can use sources of *secondary data*, such as data provided by HUD, or collect *primary data*.

- *Secondary data* are data that have already been collected and packaged by another organization, for example, data from the U.S. Census Bureau (Census) or administrative data from a city or county.
- *Primary data* are original data that you collect. These include surveys, interviews, and focus groups.

Secondary data can help answer 'what' questions. The data are useful in quantifying demographic and economic trends. These data are often more geographically comprehensive (covering an entire jurisdiction or neighborhood), which allows planners to feel more certain that they reflect actual trends in the community. These data are often ready to use immediately and do not require time to collect.

Primary data can help answer 'why' questions. They can help explain why certain trends exist and can more Primary data can help answer 'why' questions. They can help explain why certain trends exist and can more deeply explore people's experiences and preferences. They also provide more flexibility in what questions can be asked to community residents and allow you to target population subgroups as part of your fair housing planning process.

This section describes sources of **secondary data**, including national-level sources and those that you can find within your local community. Secondary data is easier to collect and generally broader than primary data, so it is useful to acquire it at the start of the data collection process.

HUD Data Sources

HUD provides a variety of datasets to inform program participants' fair housing planning process. Much of this data is housed within the **AFFH Data and Mapping Tool**, also known as the AFFH-T. This interactive toolkit helps planners access and visualize the most essential information needed to identify barriers to fair housing.

The AFFH-T contains data on community demographics, including **race, national origin, and disability status**. It also covers housing-related concerns such as job proximity, school quality, transit accessibility, and environmental health. For some topics, the site provides historical data that can chart changes in demographics and housing measures over time. Program participants may access the AFFH-T at no cost.

AFFH-T Raw Data

Some program participants may prefer to work with HUD's AFFH-T data in their own GIS or statistical software. These data can be downloaded at no cost from HUD's **Geospatial Data Storefront**. Note that more recent data may be available from the Census Bureau and other sources than is included in the AFFH-T.

Program participants can use the AFFH-T platform to access pre-populated tables with demographic and housing, and opportunity indices, or to view a variety of maps on segregation and access to areas of opportunity. More information about using the AFFH-T for fair housing planning is included in the Analyzing Data section of the toolkit.

HUD also publishes many other datasets that are not included within the AFFH-T, but which may be valuable for fair housing planning. These include data from:

- **Comprehensive Housing Affordability Strategy (CHAS)** - An annually updated dataset produced by HUD to help entitlement jurisdictions identify the number of residents in need of housing assistance. The data are derived from the American Community Survey and focus on four housing issues: affordability, overcrowding, lack of kitchen facilities, and lack of plumbing. CHAS data allows planners to measure these problems across income groups and many protected classes.

- **Community Planning and Development (CPD**): Like the AFFH-T, HUD's CPD Maps tool combines demographic and housing data into an interactive kit, designed to help program participants complete consolidated plans. Compared to the AFFH-T, CPD Maps has more detailed data on income classifications and housing type, as well as data on existing HUD-funded entitlement programs like CDBG and HOME. This makes it useful for understanding a community's overall housing needs and any existing interventions that address them.

- **Low-Income Housing Tax Credit (LIHTC**): HUD provides data on all 3.4 million housing units funded by Low-Income Housing Tax Credits, including data about both properties and tenants. These data can be useful in establishing where low-income housing is currently located in a community and what kinds of populations are concentrated in it.

- **Picture of Subsidized Households**: This annual HUD publication describes tenants living in federally-funded assisted housing. It encompasses residents who live in public or private project-based housing, as well as those who receive tenant assistance through Housing Choice Vouchers and similar programs. Like LIHTC data, the Picture of Subsidized Housing primarily offers basic demographic data on tenants and properties. However, it also incorporates harder-to-access elements like waitlist times and average utility costs for residents.

- **Fair Housing complaints**: HUD publishes county-level fair housing complaint data about the number of Fair Housing Act complaints filed by jurisdictions, which includes the basis upon which those complaints were made (e.g., discrimination based on familial status or religion). These data can suggest where and for what reasons fair housing violations may be occurring in a community.

Census and Other Secondary Data Sources

While there is a wealth of data provided in HUD's data tools, you will likely want to supplement these data with additional or more recent data from other sources. Census data, in particular, are essential for **understanding the demographics of protected classes in a jurisdiction or region.** Data discussed in

this module are already compiled by other organizations and is either able to be downloaded for analysis or is available in an online interactive format.

The **American Community Survey** is collected each year and provides broad demographic information as well as housing, income, transportation, and labor force data. It can be useful in understanding community trends and patterns beyond those offered in the AFFH-T. **Community profiles** provide an easy-to-use set of statistics that include additional information on protected classes. These include relevant data about:

- Basic demographics like race, age, and gender
- Foreign-born population
- Most commonly spoken languages
- Veteran population
- Housing, poverty, and labor force status

What are the protected classes under the Fair Housing Act?

- Race
- Color
- National Origin
- Religion
- Sex — includes gender identity and sexual orientation
- Familial Status — includes families with children under the age of 18, pregnant persons, any person in the process of securing legal custody of a minor child (including adoptive or foster parents), persons with written permission of the parent or legal guardian
- Disability

To break down the characteristics of residents to more granular levels or across multiple categories, communities with experienced data analysts can access de-identified individual American Community Survey and Census data using **IPUMS data**. These data can help communities identify the percentage of protected classes that may face housing affordability challenges.

For some protected class, Census data are not collected, or the data collected do not perfectly align with protected characteristics. In these cases, additional data collection or the use of alternate data sources is encouraged. For instance, high-level data on people with disabilities is often too general to inform housing analysis. Many jurisdictions seek out more specific data to assess the fair housing challenges faced by member of their community with disabilities (see the "Disability and Accessibility Analysis" section for more details).

To access demographics on same-sex couples by county, the **Williams Institute** at UCLA provides **accessible maps and data resources**. These data can help you **assess the size of the LGBT+ population** in your community. Note that the Williams Institute offers additional data on LGBT+ populations, such as race, gender, and family status of LBGT individuals and same-sex couples, but not for all jurisdictions.

The Census does not collect information on **religious affiliation**, but it is important that fair housing planning incorporate analysis of housing discrimination and barriers to opportunity

people experience based on their religion. Considering analyzing the following data in your fair housing planning process to assess fair housing barriers based on religion:

- Surveys of individuals or organizations that represent different religious groups
- Findings from interviews or focus groups with individuals or organizations that represent different religious groups
- Fair housing complaint data based on religion
- Statistics on hate crimes based on religion

The protected class of **national origin** refers to the country in which a person was born or the country in which their ancestors were born. Under the Fair Housing Act, housing discrimination is illegal against someone based on, for example:

- being born in Turkey
- being born in the U.S. but having Turkish ancestors
- being perceived to be of Turkish descent regardless of where they or their ancestors were born

The Census has limited data on national origin or ancestry. It is therefore beneficial to use more readily available proxies to analyze patterns of segregation and other barriers to fair housing based on national origin. Specifically, the Census includes data on foreign- and native-born populations and Limited English Proficient (LEP) populations.

Local Data Sources

In addition to the data discussed above, other local administrative data or local historical data can be helpful in fair housing planning.

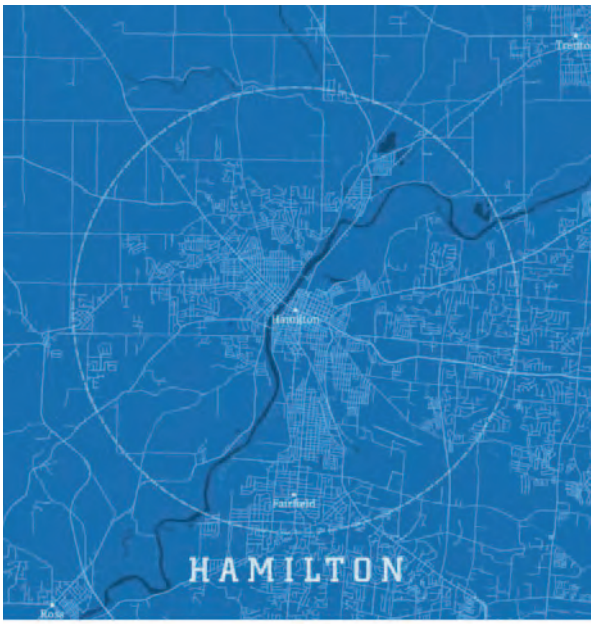
Administrative data from other local government agencies can help planners further their understanding of fair housing issues facing local residents.

- **PHAs** often have a significant amount of data on low-income renters and landlords renting to low-income households in the community. PHA staff may also have insight into fair housing complaints or difficulties their clients from protected classes face when renting homes in the community.
- **Tax records** from can provide information about current and historical homeownership trends to help understand disparities in wealth across neighborhoods.
- **County clerks** and similar archival offices may have records of covenants and other restrictions that barred homes from being sold to Black families and other protected classes.
- **Community or economic development agencies** may have information about job training programs and business investments in a jurisdiction.

- **Social or human services agencies** may be able to provide more granular, localized information about the needs of people with disabilities, immigrant populations, families, and children.

Other local agencies that serve the community or certain subgroups within the community may also be willing to provide important data on potential fair housing issues in the community. For example:

- **The United Way** often has information on specific community needs.
- **Inter-religious Council**: To better understand the religious diversity in the community, planners could reach out to a local inter-religious council. This group should have a good understanding of the number of community members practicing various religions and potentially, any fair housing issues faced by community members practicing a religion other than the dominant one in the community.
- A **local human relations commission** may have internal data about disparities involving race and other protected classes in the community.
- **Identity-based advocacy groups** like the National Association for the Advancement of Colored People and the League of United Latin American Citizens may have information about the needs of the protected classes they serve.



Example: Leveraging Local Data in Hamilton, OH

As Hamilton, Ohio completed an Assessment of Fair Housing in 2016, city staff asked members of a local housing coalition to share internal data they might have about community needs. The region's Community Housing Development Organization supplied application data from their down payment assistance program. Hamilton staff reviewed this data and discovered that applicants disproportionately requested help purchasing units with three or more bedrooms. Staff investigated further and concluded that the city lacked an adequate supply of larger units, an insight they integrated into their fair housing plan.

Primary Data Collection

Primary data can help answer 'why' questions. They can help explain why certain trends exist and can more Primary data can help answer 'why' questions. They can help explain why certain trends exist and can more deeply explore people's experiences and preferences. They also provide more flexibility in what questions can be asked to community residents and allow you to target population subgroups as part of your fair housing planning process.

This module describes sources of **primary data**, such as interviews, surveys, and focus groups. It is best to collect primary data after you have already acquired and evaluated secondary data sources, which are generally better suited to identifying large scale trends. Primary data can help contextualize these observed patterns and provide insight into the mechanisms that drive them. Primary data collection requires considerable planning and effort, so while it is usually gathered after secondary data, you should not delay in beginning interviews, surveys, or focus groups if your analysis will rely on them.

To conduct fair housing planning, you can use sources of *secondary data*, such as data provided by HUD, or collect *primary* data.

- **Secondary data** are data that have already been collected and packaged by another organization, for example, data from the U.S. Census Bureau (Census) or administrative data from a city or county.
- **Primary data** are original data that you collect. These include surveys, interviews, and focus groups.

Secondary data can help answer 'what' questions. The data are useful in quantifying demographic and economic trends. These data are often more geographically comprehensive (covering an entire jurisdiction or neighborhood), which allows planners to feel more certain that they reflect actual trends in the community. These data are often ready to use immediately and do not require time to collect.

Community surveys, resident focus groups, community member interviews, or solicited comments gathered from residents can supplement the existing data sources discussed in the previous module. **Qualitative data like these can provide further insight into the experiences and perceptions of community members related to fair housing.** These forms of data can supplement demographic data and provide a better understanding of why these patterns might exist. They can also help differentiate between the experiences and perceptions of different groups in the community. When collecting data from the public, it is especially important to reach groups that may experience housing discrimination or that might feel uncomfortable engaging though typical public feedback mechanisms.

Common Sources of Primary Data

- Surveys
- Focus Groups
- Interviews
- Comments from community participation events

This module provides information on how you can use different types of qualitative data to supplement HUD data and how you can gather these data and position them to inform the fair housing planning process. See the section "Engaging the Public" to learn more about best practices for reaching potential respondents to ensure the data represent your community. See the next section for further information about analyzing and interpreting these data.

Survey Data

Survey data is helpful in quantifying the prevalence of perceptions, behaviors, awareness, or needs related to fair housing among community groups. **Surveys allow feedback from a wider swath of residents** than may attend a public meeting and from specific subgroups in the community who may not typically provide feedback through formal channels.

Surveys can help provide information on, for example:

- Levels of community awareness about fair housing issues, the prevalence of certain discriminatory experiences, or which public outreach resources are most needed
- Differences between groups that are surveyed, such as residents of different neighborhoods or members of different protected classes

Surveys should be carefully designed to ensure they reach the intended audience and that respondents understand and can easily answer the questions. You should also take care when interpreting survey results to understand and communicate how widely the results represent community or subgroup opinions. Always budget additional time in the planning process to draft, test, send out, and allow time for residents to complete a survey.

Example: Survey Success in Washtenaw County, MI

While preparing their 2017 AFH, Washtenaw County, Michigan received an unexpectedly high response to a survey sent to community members. Washtenaw's fair housing team attributed the response rate to successful outreach and their use of a survey incentive, a prize drawing. They also provided the survey in Spanish and English and distributed it through multiple channels: online, postal mail, and in-person at local agencies. To create the survey, Washtenaw borrowed from a survey already tested in another community. This allowed them to save time and build on another community's success. **Learn more about their effort**.

Designing Surveys

When designing a survey, it is important to **first understand the types of evidence you would like to acquire from the survey** and then work backwards to design questions that can access the specific information you want. Knowing your audience is also helpful in tailoring questions to their experiences, and to using words or language with which they are familiar. In general, it is essential that you pay careful attention to the wording of questions. As a rule of thumb, before including any question in a survey, make sure that the response options will encourage responses that are clear and that your analysis of the responses will provide meaningful information. Always ask yourself "will responses to this question yield the right type of information I need to support fair housing planning?"

Additional Survey Design Considerations

- To avoid ambiguity, be as specific as possible in your questions. Offer an example or description of situations you are asking about.
- Keep the survey as succinct as possible. The more questions, the more likely subjects are to lose interest or speed through their responses to reach the finish line.
- Start and end with relatively simple questions. Place more challenging or sensitive material in the middle of the survey. This structure helps respondents ease into the process while still ensuring they have energy to answer potentially difficult questions.
- Ask questions that people can answer from their personal experiences, rather than asking them to speculate about what other people might think.
- Phrase questions as simply as possible. If it is essential to include jargon, always define terms with which respondents might not be familiar.
- Avoid using loaded language that suggests which answer you think is most likely or desirable.
- Ask simple questions without multiple parts. Don't ask about more than one topic at a time.
- Use response scales rather than Yes/No or True/False binaries. This creates room for a broader range of perspectives that can also be measured quantitatively.
- Add an 'other' option to allow people to write-in possible answers you did not include. Refine questions by testing the survey on a few people similar to those who will ultimately complete it.

Sending The Survey

Surveys in research studies are typically intended to be representative of the population being studied. This means that the research team has a high degree of certainty that results of the survey match the opinions or behaviors of the population at large. Representation is achieved by surveying an adequate percentage of the population and getting enough of the people who were surveyed to respond. Researchers often randomly select survey recipients to meet the rules for using certain types of statistics and to ensure there is no systematic trend in the characteristics of people who receive it. For example, if only people who lived in a certain neighborhood received or answered the survey, it could lead to incorrect interpretations of survey results. **Randomization of survey recipients is ideal, but not always**

practical. To come closer to the beneficial effects of randomization, consider sending surveys to a larger number of community members and over-survey members of subgroups of protected classes. Over-surveying means sending out more surveys to these certain types of households than is proportionate to the percentage the group makes up of the community population.

Program participants can **use tax rolls, property records, and other lists of residents to generate a list of community members to receive the survey**. However, be aware that these lists may exclude certain community members like renters or families who are in temporary living quarters. These groups can be reached through organizations they frequent or agencies that serve these populations. See the section "Engaging the Public" for more information on outreach to community residents. Key elements for selecting survey recipients include:

- Distribute the survey through multiple outlets so that it can reach widest audience. The more community members that respond, the more likely the data will reflect the results you would get if everyone in the community had answered the survey.
- Intentionally over-survey sub-groups who may be most impacted by fair housing issues. You want to ensure that you get enough responses from residents who belong to protected classes so you can use survey data to understand their experiences.
- Think about who does not have access to the survey and how they might be given access. For example, if the survey is online, consider sending paper versions to elderly residents or give them to community agencies to forward on to low-income families who do not have access to computers. If the survey is enclosed in a property tax bill, renters should also be sent the survey.

Getting a high response rate to the survey is also important. This can be achieved by drawing people's attention to the survey's importance, making it easy to complete, and providing incentives to complete it. Here are some steps to improve your response rate.

- Provide the survey in a mode that is easy for people to access, convenient, and conveys its importance. For example, some program participants have provided a survey in the same envelope as a tax bill to be sure residents received it.
- Make sure the survey is short and easy to complete. Questions that require less reading and that are answered in the same simple format (yes/no, rating scale) are more likely to be answered.
- Offer an incentive to complete the survey, such as gift card or entry into a prize drawing.

After the survey period has closed, the team should also review the characteristics of respondents and investigate why certain groups (like renters or seniors) may not have responded. Taking these steps can help the team be sure important community groups were not missed in the survey and that the survey results are actionable.

Focus Groups

Focus groups allow people to share more details about their experiences and preferences and to explore these issues with their peers. Unlike surveys, questions will be more open-ended and are designed to encourage discussion. The discussion should help participants react to situations or better recall experiences and preferences.

Focus groups ask a series of questions designed to engage people in discussion about their perceptions, behaviors, or needs. Often, these groups are tailored to address issues facing a specific population within the community. For example, **a focus group of local renters could discuss the stock of affordable rentals and what could be done to improve access to these units** or provide more units in desirable neighborhoods.

Focus Groups Can Provide Information On:

- Reactions to products, policies, or resources
- Details about experiences, perceptions, and needs
- Explanations for behaviors or perceptions
- Common themes among group members

Focus group members often agree on issues being discussed even if some members of the group might not feel the same way. You should be mindful that it is often difficult for participants to discuss confidential or personal issues in a focus group filled with people they likely do not know.

Selecting Focus Group Participants

Before selecting participants, it is best to outline focus group goals. You could seek to gain the whole community's overall perspective on fair housing and affordable housing accessibility. In this case, focus groups would include participants that represented all types of people in the community. At the same time, program participants could seek to understand the experiences of specific groups in the community such as members of protected classes, renters, or real estate professionals. In this case, participants would be representative of those specific subgroups. Subgroups are ideal if you would like to know more about experiences that may not apply to all community members. Focus group participants can be reached through community groups or direct outreach. Incentives can help increase focus group participation. Incentives should especially be considered for participants from underserved communities.

Example focus groups could consist of renters, landlords, residents from a certain neighborhood, members of a certain interest, demographic, or community group, real estate professionals, local religious leaders, public housing residents, or frequent public transit riders.

Administering a Focus Group

Like with a survey, it is important to understand what information you would like gain before you design the questions that will guide group discussion. Focus groups should encourage group discussion of an issue. The moderator should be able to initiate discussion and summarize the themes the group articulates. They should not be an active participant in the discussion and should remain neutral on opinions expressed by the group. It can be helpful to have an outside moderator from a community organization rather than an employee of the jurisdiction leading the focus group.

Example: Reaching Marginalized Groups in New Mexico

To inform their unified 2017 Assessment of Fair Housing, the cities of Albuquerque and Rio Rancho, NM conducted nine focus groups with over 100 participants. The cities concentrated on groups, such as non-English speakers and low-income homeowners, whose experiences would be difficult to capture through existing data sources or standard community participation activities. Besides recruiting through community partners, staff also used creative approaches to access hard-to-reach perspectives. For instance, staff spoke with teachers and childcare workers who, through their careers, were well-acquainted with many parents of young children and could speak to housing challenges affecting them as a group.

Interviews

Finally, **interviews can help provide an in-depth understanding of residents' experiences, processes, or beliefs.** Interviews should cover questions that cannot be answered as "yes" or "no" or easily quantified through a survey. Rather than counting the prevalence of an action, or gaining the perspective of a key group, interviews can provide explanations for behavior or clarify processes. They can supplement quantitative data by providing a deeper understanding of a behavior, experience, or belief. The number of interviewees can vary, and team members do not need to talk with as many community members (as in surveys) to understand the issues. Once interviewers begin to hear repeated themes, they know they have identified an explanation that may be resonating with other community members.

Interviews can be helpful to gain details about the perspective of an important group of stakeholders that may not participate in a focus group or survey. Interviews often cover information that others may not

want to divulge in a group and are more in-depth than other forms of public feedback. They are also flexible in format and allow the interviewer to change the course of the discussion if needed.

Interviews can help provide information on:

- Detailed accounts, including feelings about experiences and explanations of behaviors
- Proprietary or confidential information
- Experiences people may not want to discuss with a group

Interviews take longer and can include fewer participants than other forms of primary data collection.

Selecting Interviewees and Conducting Interviews

Like with focus groups, interviewees can be representative of the community at large or members of a specific group, depending on what the planning team hopes to learn through the interview process. Interview participants should have firsthand knowledge of the subjects being discussed so they can provide details about the issue. Interviewers should select a private space for the interview so that the discussion can remain confidential. As in focus groups, interviewers should try to remain neutral and pose questions to facilitate discussion. Interview questions should be drafted beforehand, but question order should remain flexible to follow the direction of the discussion or probe more deeply into a specific topic. Example interviews can be with a local fair housing advocacy leader, neighborhood association leader, tenant advocacy leader, civil rights activist, legal services manager, lender, realtor, or fair housing violation claimant.

Crafting Interview Questions

At their core, interviews are simple conversations between two people. However, it takes thought and practice to craft interviews that reveal as much useful information as possible. When designing an interview guide, consider these best practices.

- Begin by introducing the premise of the interview and what you hope to learn from it. This helps orient your subject toward the topics that will be most useful and relevant.
- Use language that your subject can understand. If interviewing a diverse collection of stakeholders, it may be necessary to create various versions of questions to reach different audiences. A fair housing expert will be familiar with terms that a generic member of the community might not have encountered. If jargon is necessary, define your terms.
- Write an appropriate number of questions for the length of the interview. It is better to get fleshed-out answers to fewer questions than incomplete answers to many questions. Have a plan in place for which questions to eliminate if time is running low.
- Start with big picture questions, and then shift toward more specific follow-ups. This allows subjects to introduce concepts that the interviewer can probe.
- Ask simpler questions first before moving to more difficult or sensitive topics. This gives the interviewer time to establish trust and rapport.

- As in surveys, ask subjects about their personal experiences. Questions that ask about tangible events and feelings often evoke useful stories and reflections. Avoid "why" questions that ask the subject to explain a phenomenon. When faced with these sorts of prompts, most people can only offer vague or speculative answers.
- Keep your questions open ended. No matter how well you prepare, the universe of possible answers is always bigger than what you can predict ahead of time. Give your subjects space to speak their mind without constraints. Avoid steering subjects toward specific answers.
- Brainstorm potential follow-up questions ahead of time. This reduces the burden that interviewers face to craft well-phrased probes on the fly.

Other Public Feedback

Solicited comments like those given by residents and stakeholders at a public meeting, on social media, or via email can also be used to incorporate public feedback. **These comments likely represent strong viewpoints of community members who were motivated to share**. This form of public feedback likely comes from people who are already invested in some way (positively or negatively) in the discussion. It does not represent the viewpoint of the community in the same way as targeted and carefully developed surveys, focus groups, or interviews and may miss important viewpoints of other community members. It is important to supplement this form of feedback with targeted outreach. However, this type of feedback can be useful to identify strong opinions circulating among the community and craft further public outreach strategies.

Example: Incorporating Community Feedback

El Paso County, Colorado is a large land area that contains a major city and smaller rural communities. While preparing its 2017 Assessment of Fair Housing, county planners encountered a wide range of opinions about impediments to fair housing held by community members. The strong opinions expressed by community members helped the team to shape their inclusive and wide-reaching public outreach process as well as craft a clear narrative around creating AFH goals that would benefit the entire community.

Analyzing Data

Successful fair housing plans are always data-driven. Their goals are informed by evidence-based observations about a community and its residents. But data do not appear instantly or speak for themselves. Program participants must collect and effectively analyze data to reach conclusions that can shape fair housing goals and actions.

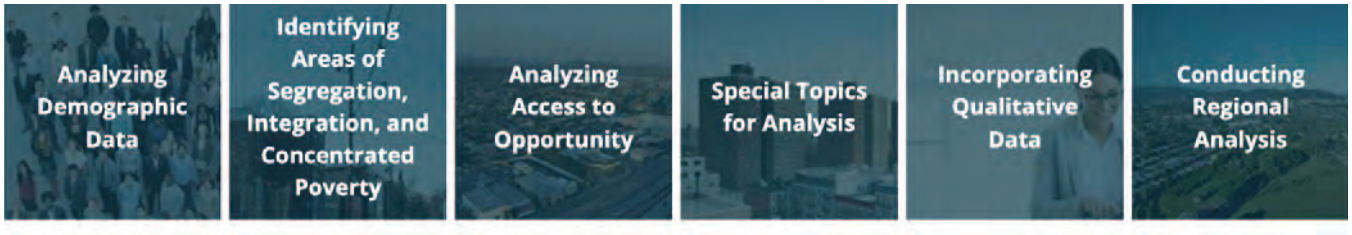
This section details specific **approaches to data analysis**, describing how to translate raw information into clear, actionable observations. Because masses of data can seem overwhelming to process, this section emphasizes ways to analyze them efficiently and grasp the most applicable housing concerns. For guidance on collecting data, see the previous section.

Strive to gather as much relevant data as possible to understand the full scope of local housing challenges. **The more you know about fair housing barriers, the better you can effectively address their causes.** By conducting robust fair housing analysis, you will be well positioned to determine appropriate goals to affirmatively further fair housing.

In the section, you will learn about:

- Leveraging existing data analysis tools
- Analyzing different forms of data together
- Integrating data about topics outside a traditional housing purview into fair housing analysis
- Considering local concerns in the context of regional trends

Select a following topic to learn more about analyzing data:



Analyzing Demographic Data

As a first step in conducting fair housing analysis, take stock of the size and share of protected classes residing in your jurisdiction and how those populations have changed over time. This analysis is helpful in several ways:

- It provides a baseline understanding of the different types of protected classes in your jurisdiction, the number of people in each protected class category, and the share of the overall population that is represented in in each protected class category. This information is fundamental to assessing the fair housing landscape in your jurisdiction and informing analysis of segregation and barriers to access to opportunity.
- By looking at changes to the population of protected classes over time, such as an increase in the number of residents with a disability or a decrease in the share of the population that is foreign-born, you may identify groups in need of additional resources or that may be experiencing barriers to housing choice.

As discussed earlier in this module, most of the demographic data needed is available from the U.S. Census Bureau.

Analyze Protected Classes

It can be helpful to produce a summary table like below that details the number of individuals and share of the overall population who are members of protected classes. The data displayed in the table describe the fictional city of Greenwell, created to model common challenges faced by mid-sized jurisdictions.

Greenwell, USA Jurisdiction

Total Population	Number	Percent
Total Jurisdiction Population	329,347	100.00

Population by Protected Class	Number	Percent
Non-White	164,956	50.09
Hispanic	46,435	14.10
Foreign-born	33,811	10.27
Limited English Proficiency	29,016	8.81
People With a Disability	34,118	10.36
Female	168,955	51.30

Analyze Sub-Populations

For certain protected classes, including race, national origin, and disability, it can be helpful to analyze sub-populations within the overall category, as shown in the following table. For example, in addition to analyzing the size and share of the overall population that are people with a disability, analyze the share of people with specific types of disabilities. Or, when analyzing national origin, in addition to analyzing the size and share of the overall population that is foreign-born, consider analyzing the size and share of the foreign-born population from specific regions or countries.

Greenwell, USA Jurisdiction

Total Population	Number	Percent
Total Jurisdiction Population	329,347	100.00

Population by Disability Type	Number	Percent
Hearing Difficulty	8,069	2.45
Vision Difficulty	5,808	1.38
Cognitive Difficulty	11,978	3.48
Ambulatory Difficulty	18,683	6.47
Self-Care Difficulty	6,249	1.80
Independent Living Difficulty	999	3.00

Example: Recognizing Hard-to-Measure Groups

Just as some groups are difficult to reach during public outreach, particular communities may be excluded or misrepresented by demographic data. In Lewisville, Texas, planners knew that their community included growing refugee population of Chin people from Burma. However, the growth of this population was so recent that it was not captured by most available data. What data did exist rarely made it possible to examine Chin people specifically. To address the gap, the city worked with community agencies to collect demographic data that could inform the city on the Chin community and its housing needs.

Identifying Areas of Segregation, Integration, and Concentrated Poverty

Program participants are obligated to take meaningful steps to mitigate segregation based on protected characteristics and build inclusive communities that offer access to opportunity for all. To meet this obligation, program participants conducting fair housing planning should analyze levels and patterns of segregation in its jurisdiction. Additionally, because negative impacts of segregation can contribute to and be exacerbated by low incomes, you should also analyze levels and patterns of concentrated poverty in its jurisdiction.

> ***"A condition, within the program participant's geographic area of analysis, 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."***
>
> *HUD's Definition of Segregation*

Measuring Segregation

Segregation can be measured using multiple techniques and at varying geographic levels. Most commonly, segregation is measured with the **dissimilarity index**, the use of which HUD has encouraged in previous fair housing planning processes. The dissimilarity index reflects on a scale from 0-100 the extent to which any two groups, such as non-Hispanic Blacks and non-Hispanic whites, are evenly distributed across an area, such as a city or county. A dissimilarity index of 0 reflects perfect integration between two groups and a value of 100 reflects total segregation of two groups.

To determine dissimilarity index values for a jurisdiction, program participants should consider the following options:

1. Determine the groups for which you want to determine a dissimilarity index value. For fair housing planning purposes, this should include protected classes, especially racial and ethnic groups. Keep in mind that only two groups can be included in the calculation of the dissimilarity index. The following table provides examples of groups for which the dissimilarity index can reveal important information about the level of segregation in a jurisdiction. You will want to tailor your choices in a way that reflects the makeup of your community, such as by calculating values for multiple ethnic groups or foreign-born populations if the jurisdiction is very diverse or has a large immigrant population.

Group 1	Group 2
Hispanic or Latino Population	Not Hispanic or Latino Population
Asian, not Hispanic Population	White, not Hispanic Population
People with No Disabilities	People with One or More Disabilities

Group 1	Group 2
Foreign-born Population	Native-born Population
People Who Speak a Language Other Than English at Home	People Who Do Not Speak a Language Other Than English at Home

2. Determine the geographic unit of analysis within the jurisdiction. Demographic data are available at multiple geographic levels, covering areas that encompass anywhere from hundreds of people to hundreds of thousands. In general, choose the smallest unit of analysis available, for instance, census tracts or block groups (which cover a neighborhood or a small collection of streets). Larger units might mask segregation by merging distinct, segregated neighborhoods into a single data point.

3. Find or calculate dissimilarity index values for your jurisdiction. Pre-calculated values can be obtained from several sources:
   - —HUD's **AFFH-T** provides dissimilarity index values for local government jurisdictions and regions in four categories:
     - Non-White/White
     - Black/White
     - Hispanic/White
     - Asian or Pacific Islander/White

   Values are available for 1990, 2000, and 2010, which can enable users to see how levels of segregation may have changed over time. At this time, the AFFH-T does not provide values more recent than 2010, nor for other population comparisons that may be helpful in diverse jurisdictions, such as Black/Hispanic or Hispanic/Asian.
   - —The **Federal Reserve Bank of St. Louis** provides white to non-white dissimilarity index values for all U.S. counties and select cities from 2009-2020.
   - —Brown University's **Diversity and Disparities project** provides dissimilarity index values for all U.S. metropolitan areas, covering each decennial census year from 1980 to 2020.

For more recent or more detailed data, program participants can calculate dissimilarity index values for their jurisdiction using Census data. To conduct the calculation, download data for the population groups of interest for all sub-geographic areas in the jurisdiction (e.g., the non-Hispanic Black and Hispanic population residing in each block group in a city). Then, either conduct the calculation using statistical software or add your data to this **Excel template**. For users wanting to conduct their own analysis, a detailed explanation of the calculation is available in the Indices chapter of HUD's AFFH-T Data Documentation guide.

4. Use the following table to interpret the results of dissimilarity index values.

Dissimilarity Index Values	Description
<40	Low Segregation
40-55	Moderate Segregation
>55	High Segregation

For jurisdictions with moderate or high segregation for protected classes, program participants should consider conducting additional analysis to understand:

- How many members of protected classes reside in segregated areas
- Where segregated areas are in relation to areas of opportunity
- Factors contributing to segregation for members of protected classes

This additional analysis, described in the following section is important to developing a deep understanding of barriers to fair housing in a jurisdiction and developing goals that are targeted to reducing segregation and eliminating the identified barriers. The goal setting process is explained in the final section of the toolkit.

Other Measures of Segregation

- While dissimilarity index values are the most common method used to quantify segregation, they are not the only tool available. In this **brief**, the Census Bureau outlines other formulas for measuring segregation. Dissimilarity index values consider how evenly disbursed a population within a jurisdiction, but other metrics consider different dimensions of segregation. Specifically, they can help measure the extent to which groups are:
  - Exposed to or isolated from each other
  - Concentrated or clustered geographically
  - Centrally located in a jurisdiction or region

Identifying Areas of Segregation

The Fair Housing Act mandates that program participants must take steps to reduce segregated areas in their jurisdictions. While the dissimilarly index discussed above is useful in determining overall levels of segregation in a jurisdiction, it does not explain which areas in a jurisdiction may be segregated. To do so, it is recommended that you **conduct additional analyses to identify segregated areas and protected classes residing in segregated areas**.

As a first step, consider analyzing the relative concentration of protected classes in neighborhoods across the jurisdiction. Using Census population data, preferably at the tract or block group level, compare the number of members of protected classes residing in each area with the number you would expect to reside in each area if the population was evenly distributed across the jurisdiction. For example, as shown in the following below, for a jurisdiction in which 10 percent of the total population is Black non-Hispanic, we would expect in the absence of segregation that 10 percent of the population in each tract would be Black non-Hispanic. If Black non-Hispanics are overrepresented in an area, that may indicate a lack of housing choice elsewhere that is resulting in their concentration in certain neighborhoods; similarly, if Black non-Hispanics are underrepresented in an area, that may indicate unlawful barriers for that group to residing in that area.

To assist in interpreting the findings, categorize each tract in one of the three following categories:

- Areas with less than or equal to .75 times the expected share of the population reflect underrepresentation of that group relative to their share of overall population. These areas may be exclusionary and warrant further investigation.
- Areas with more than .75 times the expected share of a population but less than 1.25 times the expected share of a population are areas of relative integration.
- Areas with greater than 1.25 times the expected share of a population may be areas of segregation and warrant further investigation.

The following table is an example of how you might present jurisdictional and tract level information about possible segregation and integration for a protected class, in this case the Black non-Hispanic population in the fictional community of Greenwell USA.

Area	Total Population	Black Non-Hispanic Population (and Share of Total)	Expected Black Non-Hispanic Population	Actual Population:
Greenwell, USA	750,000	75,000 (10%)		
Tract 1	8,000	2,200 (28%)	800	Overrepresented
Tract 2	6,500	450 (7%)	650	Underrepresented
Tract 3	7,250	795 (11%)	725	Integrated
Tract 4	5,850	5,100 (87%)	585	Overrepresented
Tract 5	4,600	415 (9%)	460	Integrated

(Underrepresented: ≤ .75 expected; Integrated: >.75 and <1.25 expected; Overrepresented: ≥1.25 expected)

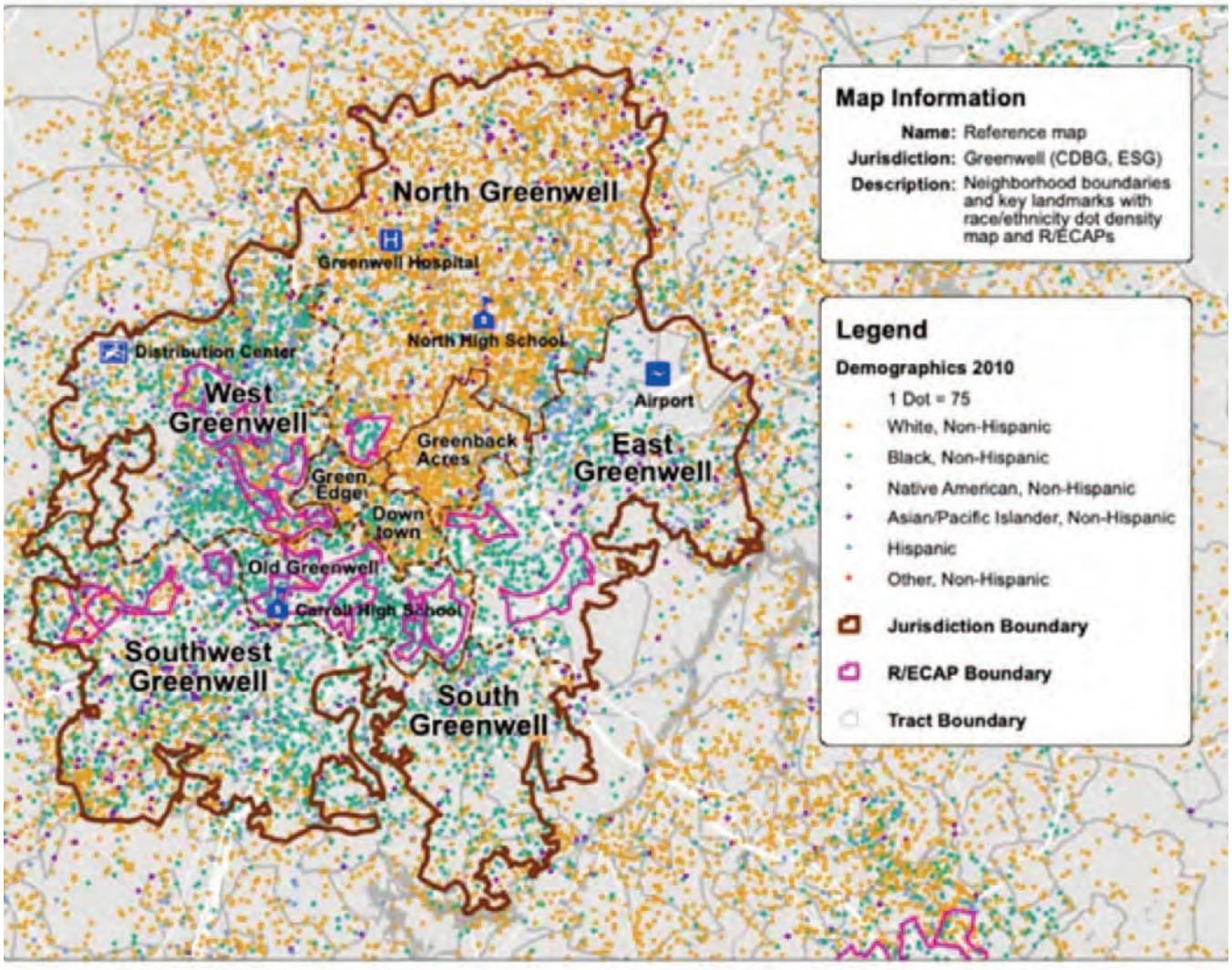
Another means of identifying segregated areas is by **mapping where members of protected classes reside and looking for areas of segregation and integration**. Dot density maps display the distribution of residents across an area using different colored dots to represent different population groups (spatial heat maps are an alternative technique that use intensity of colors rather than dots to display data). For example, the following image shows a dot density map for the fictional community of Greenwell USA, with different colored dots to represent racial and ethnic populations. Dot density maps can be created using GIS or data visualization software, and HUD provides dot density maps on the **AFFH-T** for racial/ethnic, national origin, and limited English proficient (LEP) populations.

Tips for Interpreting Dot Density Maps:

1. Assess the overall distribution of people (dots) across the jurisdiction, taking note of areas in which populations of interest appear overrepresented (i.e., dots for a certain population are clustered in one or more areas) or underrepresented (dots for a certain population are not visible in areas inhabited by other groups).
2. Keep in mind that dots representing large population groups can hide dots representing smaller population groups. To avoid missing information about relatively small population groups, it can be

helpful to create individual maps for each population of interest and take note of areas of relative overrepresentation or underrepresentation. This technique can also be helpful for jurisdictions that are densely populated and diverse, as a large number of dots can obscure patterns of segregation and integration. It can additionally be helpful to change the size and color of the dots and the color of the background map, if possible, to add contrast and make spatial patterns easier to identify.

3. To the extent possible, capture notes about areas of segregation and integration according to neighborhood boundaries, tracts, or block groups. This can help combine the results of your analysis with other analyses, such as access to opportunity areas for protected class groups.
4. Do not limit your observations to groups that make up a minority of the overall population. For example, in a jurisdiction that is 80 percent white non-Hispanic, 5 percent Black non-Hispanic, and 15 percent Hispanic, it is important to understand areas across the jurisdiction where each of these populations is overrepresented or underrepresented.



Historical Redlining Maps

In the 1930s, the federal Home Owners' Loan Corporation (HOLC) developed maps that graded neighborhoods by their level of "home mortgage security." Neighborhoods with low ratings were deemed too risky to receive federally-backed mortgages. The discriminatory criteria used to create these maps led most majority-Black neighborhoods to be cut off from mortgage supports through a process of "redlining."

Historic redlining maps can be accessed through the **Mapping Inequality interactive tool**. These maps can help communities understand patterns of segregation and disinvestment that continue to exist in many neighborhoods that experienced "redlining."

Measuring Racially and Ethnically Concentrated Areas of Poverty

The **deleterious effects of segregation are often compounded by high rates of poverty** in those areas and can make it difficult for residents to achieve economic mobility and access areas of opportunity. Because of this, it is important for program participants to pay special attention to racially and ethnically concentrated areas of poverty (R/ECAP). Previous HUD **guidance** defined R/ECAPs in two ways according the to the overall diversity of a jurisdiction's population:

For more diverse jurisdictions, typically located in metro areas, identify R/ECAPs as tracts that have a) poverty rates exceeding 40 percent or exceeding three times the average tract poverty rate for the metropolitan or micropolitan area, whichever threshold is lower, and b) a non-White population of 50 percent or more.

For less diverse jurisdictions, typically located outside of metro areas, identify R/ECAPs as tracts that have a) poverty rates exceeding 40 percent or exceeding three times the average tract poverty rate for the metropolitan or micropolitan area, whichever threshold is lower, and b) a non-White population of 20 percent or more.

Note that these formulas allow for a tract to qualify as a R/ECAP in multiple ways. For example, while a tract that is 30 percent non-Hispanic Black would not qualify as a R/ECAP (using the formula for diverse, urban jurisdictions), a tract that is 30 percent non-Hispanic Black and 25 percent non-white Hispanic would because the combined non-white population is greater than 50 percent.

After identifying R/ECAPs, you should analyze which protected classes disproportionately reside in those areas. Consider creating a table to compare the demographic profiles of R/ECAP and non-R/ECAP areas, such as show in the following table.

Population	Share of R/ECAP Population	Share of non-R/ECAP Population	Is Population Overrepresented or Underrepresented in R/ECAPs?
Non-Hispanic Black	45%	20%	Overrepresented
Non-Hispanic White	7%	60%	Underrepresented
Persons with a Disability	38%	27%	Overrepresented
Households that are Families with Children	65%	49%	Overrepresented
Residents Who Speak a Language Other than English at Home	12%	14%	Underrepresented

Analyzing Access to Opportunity

In addition to identifying areas of segregation and protected classes potentially affected by segregation, program participants conducting fair housing planning should examine the extent to which protected classes have equal access to opportunity. **Access to opportunity** refers to neighborhood-level conditions and factors that affect individuals' quality of life and their potential for economic and social mobility. In many communities, access to opportunity is closely correlated with race and ethnicity.

Disparities in access to opportunity refers to meaningful differences in access to opportunity that is based on protected class characteristics. Disparities in access to opportunity are determined through the types of quantitative and qualitative analysis discusses in this guidance.

By understanding how access to opportunity varies across neighborhoods and protected classes, program participants can determine actions and develop goals to address any disparities in access to opportunity that are identified.

HUD's Opportunity Indices

The **AFFH-T** provides indices that measure access to opportunity by neighborhood and for members of three protected class categories (race and ethnicity, national origin, and familial status) in seven topic areas:

- Poverty
- School Proficiency
- Jobs Proximity
- Labor Market Engagement
- Transportation Cost
- Transit Usage
- Environmental Health

The indices can be useful in identifying disparities that affect members of protected classes. Users can access tabular indices data in the AFFH-T in Table 12, Opportunity Indicators by Race/Ethnicity, and maps for each of the seven opportunity indices in Maps 7-13.

The following table lists the seven indices included in the AFFH-T and the most recent year from which their data were drawn. Note that AFFH-T data may not be up to date. Program participants are sophisticated users of data and want to replicate HUD's opportunity indices with more recent data should refer to the **AFFH-T Data Documentation guide** for the methodology and sources HUD used to create the opportunity indices.

AFFH-T Index	Sources	Age of Data
Dissimilarity Index	Decennial Census	2010
Low Poverty Index	American Community Survey	2015
School Proficiency Index	Great Schools (proficiency data), Common Core of Data (4th grade enrollment and school addresses), Maponics School Attendance Zone database	2018
Jobs Proximity Index	Longitudinal Employer-Household Dynamics (LEHD)	2017
Labor Market Engagement Index	American Community Survey	2015
Low Transportation Cost Index 2016	Location Affordability Index (LAI)	2016
Transit Trips Index	Location Affordability Index (LAI)	2016
Environmental Health Index	National Air Toxics Assessment (NATA)	2014

Analyzing Access to Opportunity with Other Data Sources

Program participants are not limited to relying on the AFFH-T to analyze access to opportunity and disparities in access to opportunity (and are in fact strongly encouraged to **seek out other data sources for your analysis**, including local data and local knowledge specific to your community).

Much of the data underlying HUD's opportunity indices are available for download and analysis outside of the AFFH-T and in many cases these data sources have been updated more recently than the AFFH-T. Additionally, there are other sources of relevant and timely data to consider incorporating into your fair housing planning process that are not available via the AFFH-T. Below we present a non-exhaustive list of resources program participants can considering incorporating into a fair housing planning process to help assess access to opportunity for protected classes.

Unless otherwise noted, the data discussed below are available at a neighborhood level (i.e., tract or block group), which enables users to produce tables or maps to compare how access to opportunity may vary across a jurisdiction and for protected classes residing in different neighborhoods. Keep the following suggestions in mind as you consider the types of analyses to conduct:

- For any measure, **compare how the score for each neighborhood compares to the score for the overall jurisdiction**. For example, first determine the percent of households in the jurisdiction that are cost burdened, then see which neighborhoods have lower or higher scores than the jurisdiction. Neighborhoods with scores that are less than .75 times or more than 1.25 times the jurisdictional score may be worthy of deeper analysis to understand why they differ from the jurisdiction as a whole, and whether they reflect possible barriers to fair housing choice.
- When feasible, **conduct sub-analyses for protected class groups and compare their scores to that of the overall population** in a jurisdiction. For example, determine the overall share of the

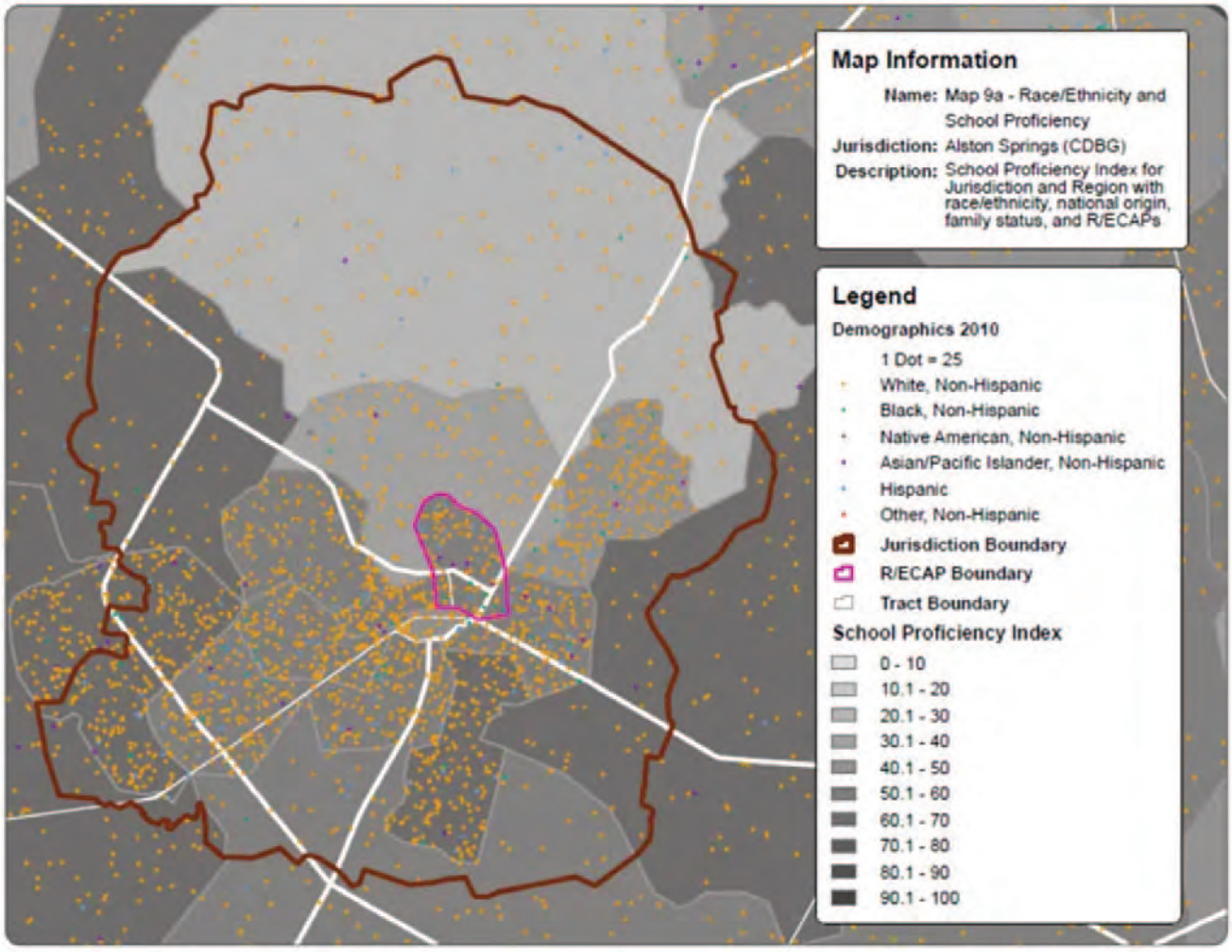
population that is cost burdened and compare that to the share of racial and ethnic, national origin, or LEP populations that are cost burdened. Populations that are more cost-burdened than the average for all population may warrant additional exploration to determine whether their housing costs are an indication of barriers to housing choice, such as the inability to access areas with more affordable housing choices.

- For any measure, **compare access to opportunity for residents in R/ECAPs to that of residents outside of R/ECAPs** to determine, for example, if one groups of residents has greater or less access to healthy food or mainstream financial services than the other.
- **Create tables to help compare access to opportunity** across neighborhoods and protected classes. A simplified example of such a table is below. Tables can also be effective tools for engaging with community members and other stakeholders.

Neighborhood	Presence of Grocery Store in Neighborhood?	Neighborhood Population	% Households that are Families with Children	% Non-White Households	% White Households
Tract 1	Yes	5,514	72%	14%	86%
Tract 2	No	8,036	84%	72%	28%
Tract 3	No	3,549	47%	68%	32%
Tract 4	Yes	4,677	61%	25%	75%
Tract 5	Yes	4,907	22%	44%	56%

- In some cases, it may be helpful to **look at both recent and historical data** – such as data from 5 or 10 years ago – to identify trends in access to opportunity. For example, while it is critical to know how many households are cost burdened today, the goals you develop to address the problem would likely be different if you also knew that more or fewer people were cost burdened 5 years ago.
- **Use mapping to help reveal patterns in access to opportunity** that may not be readily apparent from tabular data. Mapping of data points, such as where environmental hazards or transit stops are located, can help users see where problems and assets may be concentrated. Add layers to the maps that show where protected classes reside to see which groups have greater more easily or less access to opportunity. An example of such a map is below and includes a dot density layer representing racial and ethnic populations, a layer showing a single R/ECAP, and a layer shaded according to the quality of schools. Like tables, maps are excellent tools to incorporate into community participation activities, as discussed in the section **Engaging the Public.**

Map 9A: Race/Ethnicity and School Proficiency



In the table below, we describe and link to federal agencies and other organizations that provide neighborhood-level data that may be relevant to fair housing planning. Explore available datasets by clicking on topic headings in the following table. All are available at the census tract or census block group level, making them useful for assessing specific local conditions.

Housing Cost Burden

Households that spend more than 30 percent of their income on housing (including utilities) are considered housing cost burdened. Program participants can use data from the **American Community Survey** to identify whether members of protected classes are disproportionately represented among residents who are housing cost burdened.

Data are also available for households with severe cost burdens, calculated as households that spend more than 50 percent of their income on housing (including utilities) are considered housing cost burdened.

Disproportionate Housing Needs

HUD considers a household to have a severe housing problem if it meets one of four criteria:

- Lacking complete plumbing facilities
- Lacking complete kitchen facilities
- Having more than one person per room
- Being severely cost burdened by spending more than 50% of monthly household income on housing

You should consider if members of protected classes are more likely to face a severe housing problem. Localized statistics on these problems are available through HUD's **Comprehensive Housing Affordability Strategy** data system, known as CHAS.

Environmental Hazards

In many communities, the scale of environmental hazards like pollution can vary considerably between adjacent neighborhoods. The CDC monitors these disparities through its Environmental Justice Index, which combines 36 environmental, social, and health factors to create comprehensive metrics for comparing census tracts. The EPA provides similar data through its **EJSCREEN** Indexes.

Nationally, members of protected classes make up a disproportionate share of residents living near federally recognized Superfund sites, which are sites contaminated by hazardous waste. Data on the location of Superfund sites can be sourced from the **EPA**.

Planners should also be aware of possible disparities in blood lead levels across their community. Census tract level data on lead exposure, curated by the Washington Department of Health and Vox Media, is available **here**.

Disaster Vulnerability

A neighborhood's vulnerability to natural disasters depends both on ecological forces and social factors like wealth and access to health care and transportation. Both the CDC and **Census Bureau** produce indices that synthesize these factors and score each census tract based on its resiliency or vulnerability to disasters. This data can indicate whether members of protected classes face greater risk from natural disasters depending on where they live.

Additionally, FEMA's National Risk Index enables users to map the risk of 18 natural hazards, including flooding, hurricanes, and wildfires, at the county and tract level. The tool also include measures for social vulnerability and community resilience.

Access to Quality Schools

Schools play a significant role in where families choose to live, but not everyone enjoys access to high-performing, high-quality schools. School ratings data from **Great Schools** can help jurisdictions identify whether members of protected classes can access quality schools at the same rate as other populations.

The **Elementary/Secondary Information System (ElSi)** is a tool created by the National Center for Education Statistics that includes district and school-level data, such a student/teacher ratio, student demographics, and students eligible for free or reduced lunch. Users can create tables or download data or see profiles of schools or districts.

The Census' **Small Area Income and Poverty Estimates** provide school district data on students from families in poverty. While data are not available for individual schools, the district level data may be useful to regional fair housing analysis.

The U.S. Department of Education's EDFacts website offers school level math and reading assessment data.

Access to Health Care

Members of protected classes may be medically underserved if they are concentrated in neighborhoods far away from health care institutions. The **Health Resources and Services Administration** (HRSA) provides granular data on where medical facilities are located, which planners can use to identify medically isolated communities. Of particular relevance to program participants are data on populations and areas that are medically underserved or areas identified as a Health Professional Shortage Area (HPSA). According to HRSA, about 20 percent of Americans reside in HPSAs, which "may have shortages of primary medical care, dental, or mental health providers."

Access to Healthy Food

Nearly 20 million Americans live in a "food desert" in which they do not have access to a nearby grocery store. These food deserts often align with areas in which members of protected classes are concentrated. Planners can refer to the USDA's **Food Access Research Atlas** to identify if these problems affect their community.

Access to Transportation

Data from the **American Community Survey** describe how long it takes residents of each census tract to commute to work. Higher commute times for residents in areas predominantly inhabited by members of protected classes may reflect unequal access to transit and transportation services.

The **H+T Affordability Index** offers neighborhood-level data via a mapping tool on the combined cost of housing and transportation. While housing is often more affordable farther from employment centers and other opportunity areas, those cost-savings can be reduced by the high costs of commuting. In addition to the mapping tool linked above, users can download **H+T data** to conduct their own analysis.

Access to Banking

Certain neighborhoods may be underbanked or unbanked, meaning that they do not have reliable access to a nearby banking institution. The **FDIC** tracks the location of all U.S. banks, allowing planners to map banks in their community and assess whether neighborhoods enjoy equal access to them.

Access to Loans

The Home Mortgage Disclosure Act (HMDA) requires lenders to **publicly report loan-level information** about home mortgage applications and originations. HMDA data can be used to compare application and origination volumes across neighborhoods in order to identify locations where borrowers may face challenges accessing credit. HMDA data could also be used to compare mortgage application denial rates or high-interest loan origination rates among protected classes.

Under the **Community Reinvestment Act (CRA)**, lending institutions are required to **report information about their business, farm, and community development lending**. By collecting location information on where business, farm, and community development lending is occurring, CRA data can be used to assess how access to credit and private investment varies across neighborhoods. You might want to compare small-business loan origination volumes in high versus low-income neighborhoods, or identify specific neighborhoods that face barriers to accessing business credit or investment.

Evictions

Evictions data curated by the **Legal Services Corporation** can also provide clues in shaping potential fair housing goals. These data include eviction data for over 1,200 counties and municipalities. Communities experiencing a high number of evictions may want to target fair housing resources and outreach towards eviction prevention.

Labor Market Engagement

Communities with high unemployment or low labor force participation rates may be in need of additional services to help connect residents with job opportunities. This is particularly true in areas with low rates of residents with college degrees. You can use **American Community Survey data** to identify areas with low labor market engagement and educational levels.

Special Topics for Analysis

In addition to the analysis discussed above, program participants should consider targeted analyses for two populations: 1) those residing in public and assisted housing and, 2) people with disabilities. Each of these populations has special considerations for fair housing planning.

Assessing Segregation and Access to Opportunity for Residents of Public and Assisted Housing

Residents of public and assisted housing are often among the lowest-income members of a community and thus may be particularly limited by fair housing barriers. It is important, then, to incorporate analysis of segregation and access to opportunity for these individuals.

For this analysis, public and assisted housing includes:

- Public housing developments
- Project-based Section 8 developments
- Low Income Housing Tax Credit developments
- Other multifamily assisted developments
- Households assisted with Housing Choice Vouchers

Analyzing segregation and access to opportunity for residents of public and assisted housing is similar to other analysis discussed in this section. Recommended steps for the analysis include:

Determine and Compare the Demographics of Residents

For public and assisted housing overall, determine:

- The racial and ethnic makeup of residents
- The share of households that are families with children or people with disabilities
- If members of protected classes are overrepresented or underrepresented in public and assisted housing relative to their share of the overall population in the jurisdiction

Additionally, determine if members of protected classes are more likely to reside in certain types of public and assisted housing than others.

Identify Patterns of Segregation

For each category of public and assisted housing developments, determine:

- If the developments are disproportionately located in R/ECAPs or other areas with high concentrations of racial and ethnic populations
- If the developments are clustered near one another or are evenly dispersed in the jurisdiction

For Housing Choice Voucher households, determine:

- If the households are disproportionately located in R/ECAPs or other areas with high concentrations of racial and ethnic populations
- If the racial and ethnic makeup of the households is similar or different than the racial and ethnic makeup of the areas in which the households reside
- If the households are clustered near one another or are evenly dispersed in the jurisdiction

Assess Residents' Access to Opportunity

Using your analysis of access to areas of opportunity, described earlier in this section, determine if public and assisted housing developments are concentrated in areas with high access to opportunity, such as areas with high-quality schools, low transportation costs, low levels of poverty, and high levels of educational attainment and employment.

To conduct these analyses, you may make use of the **AFFH-T,** which includes 1) tabular data on the demographic makeup of residents of public and assisted housing developments, and 2) maps indicating the location of public and assisted housing developments and the share of voucher units by tract. These maps also include R/ECAPs and a racial and ethnic dot density layer, which can help identify patterns of segregation in areas where public and assisted housing is located.

For more recent or more detailed public and assisted housing data than is available in the AFFH-T, program participants with the capacity to conduct their own data analysis and mapping should consider other sources of data, such as the **National Housing Preservation Database (NHPD)**. The NHPD includes property-level data from HUD and U.S. Department of Agriculture (USDA) on the following programs with federal affordability restrictions:

- HUD Project-Based Rental Assistance
- Public Housing
- Project Based Vouchers
- Low Income Housing Tax Credits
- Mod Rehab
- Section 202 Direct Loan
- HUD Insurance Programs (that include affordability restrictions)
- State Housing Finance Agency Funded Section 236
- HOME Rental Assistance
- Section 515 Rural Rental Housing Loans
- Section 514 Direct Loans
- Rural Development Section 538

Communities can request free NHPD access and then use its interactive grid to filter the data to specific geographic locations like counties, cities, or census tracts. Once filtered, the data can be downloaded and analyzed or matched with ACS data by census tract. More detailed property-level data can be

downloaded using NHPD state files and data from other communities in the state can be deleted before analysis.

NHPD data can be especially helpful for the following analyses:

- Counting the total number of affordable housing properties and units with federal affordability restrictions
- Identifying properties and units that may soon loose affordability to low-income households
- Understanding the overlapping federal subsidies that keep a property affordable to low-income households
- Identifying which affordable housing properties serve a larger percentage of protected classes
- Matching affordable housing data to other information about neighborhoods

Disability and Accessibility Analysis

The Fair Housing Act designates people with disabilities as a protected class, covering anyone with a physical or mental impairment that disrupts their major life activities. However, people with disabilities regularly face **impediments to fair housing**, and **in some jurisdictions people with disabilities make up a plurality of those filing fair housing complaints.**

People with disabilities are unique from a protected class perspective because in some instances people with disabilities reside in facilities that serve their needs. Historically, this has contributed to the segregation of people with disabilities in institutions or group homes. By law, the unjustified segregation of people with disabilities is illegal. Like any other protected class, people with disabilities should have the opportunity to live in integrated settings. For more information on this topic, see HUD's **overview** of the importance of integrated, community based settings for people with disabilities.

Program participants should conduct analysis to identify fair housing barriers and segregated living conditions for people with disabilities, like that for other protected classes. Consider asking key questions in your analysis, such as:

- Where do people with disabilities reside within the community?
- Is the stock of affordable, accessible housing sufficient to meet demands?
- Do people with disabilities enjoy equitable access to opportunities?
- Are people with disabilities unable to reside in integrated settings or neighborhoods due to, for example, a lack of supportive services, transit, or accessible sidewalks and other pedestrian infrastructure?

The **AFFH-T** can help you identify where people with disabilities live within a community. **Explore whether this population is evenly dispersed or concentrated** in particular areas. In many communities, people with disabilities are disproportionately represented among those living in R/ECAPs.

Whether this pattern is evident in a jurisdiction or not, you should then consider where the existing stock of affordable and accessible housing is located. Ideally, the geography of existing accessible units should align with where people with disabilities reside. Pay particular attention to units in the public housing supply, which often represent one of the few sources of affordable, accessible housing for low-income residents with disabilities. Information on accessible units can be difficult to access, but local advocacy groups and organizations that serve people with disabilities may have useful data.

While access to accessible housing is crucial for people with disabilities, you should also **consider whether this population can access community assets like transit, schools, government building, and employment centers.** For instance, a low-income person with a mobility impairment might not be able to claim an affordable, accessible unit if it does not have a nearby bus stop or grocery store that they can access. The same techniques used to evaluate access to opportunity in R/ECAPs can be applied to evaluate community access in areas in which people with disabilities are concentrated.

Example: Accessible Units in Philadelphia

In its 2016 Assessment of Fair Housing, Philadelphia identified a lack of affordable, accessible units outside of the public housing system. To understand this issue, the city turned to academic literature, which suggested that Philadelphia's multi-story row houses were difficult and expensive to convert into accessible units. As a result, the city set a goal of expanding eligibility for its Adaptive Modifications Program, which helps residents cover the cost of accessibility upgrades.

Incorporating Qualitative Data in Fair Housing Analysis

Program participants should pursue opportunities to integrate qualitative data into their fair housing analysis. In previous sections, we discuss community participation and data collection activities that yield qualitative data.

Qualitative is particularly useful in contextualizing trends revealed by quantitative data. For example, while quantitative data may reveal areas of segregation in your jurisdiction, or area with limited access to opportunity, resident input can shed light on how individuals are impacted by segregation and unequal access to opportunity.

Because qualitative data compliments quantitative data and expands its descriptive power, the two should be woven together throughout the relevant sections of a plan. Consider presenting both kinds of data around a topic and use them to draw conclusions about fair housing barriers.

For instance, a jurisdiction might consider the impact of school assignment policies on residential segregation. By drawing on quantitative school enrollment data and residents' qualitative descriptions of their school choice decision-making, the HUD grantee could establish whether changes to assignment policies are needed to address segregation. **Qualitative data is also useful for telling stories about fair housing issues.** Individual perspectives can add humanizing color to data-driven narratives and help them resonate with elected officials and members of the public.

Despite the utility of qualitative data, many jurisdictions do not rely on it because it is more challenging to analyze. Tools like the AFFH-T pre-sort quantitative data into categories that make the data consistent and legible. Qualitative data, however, is much harder to organize in this manner. Residents often talk about issues in ways that differ from the terms and categories of fair housing planners, and many responses lack obvious relevance to policy goals.

Hypothetical: Filling in the Gaps with Qualitative Data

A program participant uses the AFFH-T to identify a segregated Asian-American neighborhood in their city but are not able to establish from the data why that population is concentrated in that area. Staff suspect the residents may prefer to live in that neighborhood because of the presence of shops and churches that cater to Asian-Americans.

By collecting qualitative data from residents during a public meeting and interviews with social service providers in the neighborhood, however, staff learn that residents do not always feel safe or welcome in other parts of the city. Several residents report that they pay more for rent than they would in other neighborhoods but stay put because language barriers make it difficult to find and lease an apartment elsewhere.

The program participant uses the quantitative and qualitative data to develop a goal to expand translation and interpretation services to serve LEP individuals searching for housing.

To make qualitative data useful, you should invest time to organize it and identify where it insects with planning needs. A simple way to accomplish this is to sort the data based on which section of the plan it could inform, either by copy-and-pasting text or categorizing it through a coding software. A single resident's testimony might touch on many different topics, so it is worth breaking up larger statements into smaller, sortable pieces. Once the data is organized, you should carefully analyze the content in each topic area to identify key themes and trends.

While analyzing, planning staff should critically examine potential biases in qualitative data, which often differ from biases found in quantitative data. If relying on resident feedback, acknowledge that the population who responded to outreach efforts is not necessarily representative of the community at-large. Individuals with strong opinions and the time to share them are often disproportionately represented. At the same time, individuals may have complex motivations for sharing or withholding information. Some residents may be wary of local government and reluctant to criticize it, while others may be hostile and inclined to speak negatively without underlying cause. Activist groups in particular may adopt messaging strategies to influence the planning process toward their preferred outcomes. As with quantitative data, these sources of potential bias do not preclude you from relying on qualitative data, but they require staff to think carefully about how they do so.

Conducting Regional Analysis

Beyond analyzing data on their own jurisdictions, program participants are strongly encouraged to evaluate their wider region as well. As discussed in the section **Collaborating Among HUD Program Participants,** program participants may want to partner with other program participants on a coordinated fair housing planning process. However, even program participants that do not partner with others can benefit from including regional analysis in their overall analysis.

Regional data provide broader context for understanding fair housing concerns, often revealing disparities that may not be apparent within a single jurisdiction. Regional analysis may reveal, for example, that:

- One jurisdiction in a metro area contains no R/ECAPs and a low share of the region's households of color, while a neighboring jurisdiction contains multiple R/ECAPs and a high share of the region's households of color.
- One jurisdiction has an abundance of the region's jobs but little affordable housing and no public transit, which forces lower-income residents to live in areas in the region further from employment centers and to spend more of their income on commuting to work.
- Public and assisted housing is not evenly distributed across the region and is instead concentrated in one jurisdiction with low performing schools, limiting access to opportunity for its residents.

To conduct regional data analysis, apply the same approaches used to study local data, including an **analysis of patterns of segregation, integration, and access to opportunity across the region.** The **AFFH-T** is expressly designed to accommodate regional analysis and allows users to toggle between jurisdictional and regional views of maps available in the tool. Additionally, tabular data in the AFFH-T is available at the jurisdictional and regional level on several topics, such as the following example on disproportionate housing needs.

Disproportionate Housing Needs	(Greenwell, USA, ESG) Jurisdiction			(Greenwell USA CBSA) Region		
Households experiencing any of 4 housing problems*	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	20,689	75,456	27.42	78,012	297,965	26.18
Black, Non-Hispanic	23,187	48,973	47.35	41,568	87,497	47.51
Hispanic	8,210	14,789	55.51	15,016	27,331	54.94
Asian or Pacific Islander, Non-Hispanic	2,058	5,689	36.18	3,609	10,001	36.09
Native American, Non-Hispanic	198	432	45.83	532	1,389	38.30
Other, Non-Hispanic	936	1,963	47.68	1,893	4,496	42.10
Total	*55,278*	*147,302*	37.53	*140,630*	*428,679*	*32.81*
Household Type and Size						
Family households, <5 people	25,015	78,276	31.96	68,750	250,012	27.50
Family households, 5+ people	6,125	12,014	50.98	16,349	36,998	44.19
Non-family households	24,138	57,012	42.34	55,531	141,669	39.20

Households experiencing any of 4 Severe Housing Problems**	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	9,024	76,897	11.74	35,012	291,368	12.02
Black, Non-Hispanic	13,124	50,987	25.74	20,897	88,917	23.50
Hispanic	4,012	12,985	30.90	8,057	25,986	31.01
Asian or Pacific Islander, Non-Hispanic	1,268	5,896	21.51	1,897	9,638	19.68
Native American, Non-Hispanic	128	483	26.50	254	1,389	18.29
Other, Non-Hispanic	612	2,348	26.06	1,112	4,643	23.95
Total	*28,168*	*149,596*	*18.83*	*67,229*	*421,941*	*15.93*

Beyond relying on the AFFH-T, program participants should consider collecting and analyzing other types of data to develop a deeper understanding of fair housing barriers and access to opportunity in a region, and how those are affected by the policies and practices of individual jurisdictions. Examples of such efforts include:

- Analyzing data from the regional transportation planning authority to assess barriers protected classes may experience accessing employment centers
- Interviewing real estate professionals about decisions households make about regarding where to rent or buy in the region, such as proximity to quality schools or the availability of affordable units
- Requesting data from the Chamber of Commerce or other employer representatives to analyze current and future trends in the location and types of jobs in the region, which may reveal a mismatch between where people live and where jobs are located, or help identify a need for better occupation training programs
- Surveys of nonprofit and for-profit developers working the region may help explain why certain jurisdictions in a region have an ample supply of housing while other jurisdictions struggle to meet the demand for housing
- Discussions with PHAs, fair housing advocacy organizations, and service providers in across the region can help you understand potential fair housing barriers their clients experience in the region as a whole and in your jurisdiction

Such efforts can assist you in developing goals to address any identified barriers, as discussed in the following module. When thinking regionally, keep in mind that **it is important to identify and attempt to address barriers to fair housing in the region**, even in cases where you are not partnering with other program participants on fair housing planning or have direct control over policies in other jurisdictions that may be hindering fair housing efforts in your own jurisdiction. In such cases, consider developing goals to create partnerships with or raise awareness among other regional or state entities about the need to address fair housing barriers at the regional level.

Setting Goals and Tracking Progress

Fair housing planning is ultimately about taking meaningful actions to affirmatively further fair housing. Setting ambitious but achievable goals and tracking progress toward those goals are a critical part of building on the insights you gather from community participation process and data analysis. While effective community participation activities and analysis work makes goal-setting easier, it is always a challenge to develop feasible solutions and understand how and when to implement them.

This module divides the goal-setting process into three stages: prioritizing needs, developing goals, and tracking progress. Using examples from HUD program participants across the country, it considers the most common challenges that fair housing planners face and best practices for overcoming them. The module pays particular attention to goals that think beyond the immediate purview of housing policy to consider solutions that address transportation, education, health, and employment.

In this section, you will learn about:

- Deciding how best to address fair housing impediments given local resources
- Setting SMART fair housing goals
- Tracking goals to measure implementation of a fair housing plan

Select a following topic to learn more about setting goals and tracking progress:

Prioritizing Fair Housing Goals

One important aspect of a fair housing plan is properly identifying and prioritizing specific goals based on the needs and concerns of the community, interest groups, and policy makers in the jurisdiction, all within the context of the overarching legal obligations of the Fair Housing Act. Prioritizing fair housing goals is necessary when there are many goals that could be undertaken to achieve meaningful actions to affirmatively further fair housing. It is important to consider what can be realistically achieved with the resources available during the next planning cycle.

Finding the right balance of goals and their prioritization in the fair housing plan is vital, as this will set the foundation for measuring progress and achieving the completion of these goals. How should you determine and balance your jurisdiction or agency's ambitious fair housing goals while making sure you address input from residents and local stakeholders?

This section describes best practices in developing and prioritizing fair housing goals that incorporate and balance the input and needs of vested interests in the jurisdiction.

Understanding Place-Based and Mobility Strategies

As you move through the fair housing planning process, it is important to structure and create a framework for developing fair housing goals. A common framework for identifying fair housing goals that has been used by many HUD program participants to improve opportunities for residents has included **setting both place-based investment goals and housing mobility strategies**.

Place-based investments refer to specific investments and programs in historically disinvested neighborhoods to improve the lives of local households and help stabilize economic and community development in the area. Investing in infrastructure or developing a workforce training program in communities that have not received such investment previously are both examples of place-based investments designed to improve access to economic, educational, and other opportunities for residents.

Mobility strategies refer to investments and programs that expand housing choices for residents with low income and help to reduce the level of racial and economic segregation in a jurisdiction or region. Examples of mobility-related strategies include building affordable housing in neighborhoods that benefit from well-funded infrastructure, low poverty rates, and healthy environments; investing in a housing mobility counseling program; reducing zoning barriers that prevent the development of multifamily housing in areas of opportunity; or developing partnerships with school districts to expand access for children in households with lower income to well-resourced schools.

Step 1: When trying to balance place-based and mobility strategies for your jurisdiction's fair housing goals, first consider programs and services currently being offered.

- Assess investments and programs that your jurisdiction or agency is already providing.
- Determine the state of these local investments – what they are doing to address fair housing barriers throughout your jurisdiction, how they can potentially be expanded, and whether these investments are indeed accomplishing their stated objective.
- Look at whether there is a balance of financial investment as reported in HUD documents for place-based vs housing mobility strategies.
- Measure whether the current housing investments of your jurisdiction or agency are increasing or decreasing racial and economic segregation in your area and region. For example, where has new housing for households with low income been located?

Step 2: Using your community participation process, identify additional strategies and support for current programs and services that will enhance your fair housing goals.

A major component of the fair housing community participation process is discussing priorities with community members and assessing whether those priorities are consistent with or diverge from your jurisdiction or agency's current investments. This is a great opportunity to understand community needs and concerns, as well as advocate for current investments and policies in communities, consistent with the AFFH obligation. In terms of prioritizing goals, focus on those that address programs or policies that have been identified to limit fair housing choice or access to neighborhoods of opportunity for protected classes and/or households with lower income, or those that negatively impact fair housing or civil rights compliance.

Step 3: Use a data driven analysis (as discussed in the Analyzing Data section) to assess the viability of priorities identified in the community participation process, as well as current investments and policies.

While considering which fair housing goals to prioritize, it is important to begin to gather and assess the viability of each possible goal by using quantitative and/or qualitative data. A data driven analysis can take many forms, ranging from looking at maps and tables to conducting focus groups and interviews. Incorporating data analysis will assist you in considering different ways to measure the progress and completion of each proposed fair housing goal.

Example of Los Angeles Prioritizing Goals in Fair Housing Planning

The City of Los Angeles worked in collaboration with several government agencies and community organizations to develop their fair housing goals and determine how they set their priorities in their community participation process.

For instance:

- The fair housing team first did an internal audit of programs and investments that were being offered in low-income communities and other neighborhoods throughout their jurisdiction.
- They then assessed the financial viability of these programs and investments to gauge whether these services would be continuously offered and how they would be paid for. This helped different agencies narrow down the number of goals they each would contribute to the fair housing plan. It also allowed each agency to be confident that they could accomplish their goals and maintain or expand their investments in low-income and minority neighborhoods, while at the same time expanding affordable housing options in every neighborhood of the city. The fair housing teams also supported a regionwide housing mobility program that supported greater housing choice for residents in protected classes and help address current patterns of racial and economic segregation.
- The fair housing team attended existing neighborhood events that were occurring throughout the city and set up booths that allowed them to interact with residents and community groups to gauge their concerns. They also held community meetings and town halls with different interest groups that were very helpful. Ultimately, they connected with over 300 organizations throughout the community participation process and reassessed their goal priorities throughout their meetings and interactions.

The result was a mix of sustainable fair housing goals that came from government agency priorities and the community participation process. As a result, community organizations were excited about the fair housing plan and the new relationships that had been cultivated with various agencies committed to making their neighborhoods more inclusive.

Developing Specific and Measurable Goals

Creating fair housing goals requires HUD program participants to consider not only the conclusions of their data analysis, but also available resources, community priorities, political realities, and administrative capabilities. This module will present best practices for balancing these concerns to produce goals that can be realistically implemented to remove or mitigate barriers to fair housing choice and create equitable access to opportunities for economic advancement throughout your jurisdiction. Additionally, the guidance will describe and provide examples of SMART goals.

A critical component of creating a fair housing plan is developing specific, measurable, and achievable goals based on the results of your fair housing analysis and information gathering. But what does the Fair Housing Act really require? And how should you balance pushing your jurisdiction or agency to pursue ambitious fair housing goals while ensuring you have the resources and ability to achieve them?

This module outlines best practices to follow when developing your fair housing goals, demystifying the process for you as a HUD program participant, and helping you achieve progress in your goals going forward.

Step 1: Develop goals to overcome the fair housing barriers identified through community participation and data analysis.

You will want to create meaningful goals that address segregation and inequitable access to opportunity, in addition to place-based investments, to ensure that your goals reflect a "balanced approach" to fair housing, a central tenet of fair housing planning.

Your goals must flow from the analysis you have completed. For instance, if your community has high levels of racial or economic segregation (often tied to the segregation of protected classes), or inequitable access to opportunities for economic or educational advancement, you should develop goals that aim to address those disparities. If your community is also in need of place-based investments to redress neighborhood disinvestment, you should have goals prioritizing that. Communities with both high levels of segregation and lack of investment should adopt a balanced approach to fair housing that includes goals addressing both elements.

Step 2: Use the 'SMART' system to develop goals that are specific, measurable, action-oriented, realistic, and time-bound.

- **Specific and measurable**. Specific goals are essential for a strong fair housing plan. But what does specific mean? First, goals must be *measurable*, with a specific metric for success and milestones to measure achievements. For example, a goal stating that your city will create new affordable housing in high opportunity areas is not specific enough. Instead, you could set a goal of creating fifty units of affordable housing in the high opportunity communities of X, Y, and Z.

Once you have created measurable goals, establish *milestones* for achieving each goal. For example: within six months of your fair housing plan's completion, identify three sites for new affordable housing in communities with low poverty rates; by one year, approve developers to build housing in those areas; within two years, begin construction on new buildings; by three years, finish construction; and by three and a half years, have families move into new units. Program participants may also identify multiple metrics and milestones for goals.

- **Action-oriented:** Avoid goals that are mere expressions of aspiration for change, such as "improve educational opportunities in low-income communities." Instead, for example, write specifically about what you as the HUD program participant will do to achieve that aspiration, such as forging a new partnership with the local school district and creating new tutoring programs at specific public housing developments in your community.
- **Realistic:** There's no use in setting a goal if it is impossible to achieve! HUD program participants should balance setting goals that are ambitious in tackling the core issues of fair housing – inequitable access to opportunity, segregation, discrimination, and disinvestment – while also setting goals that are possible for the agencies implementing the plan to actually achieve. There are several elements that make a goal realistic. To answer whether a goal is realistic, ask yourself the following questions:
    - **Do we have the funding to achieve this goal, or can we identify a funding source that would help us achieve it?** Identifying available funding sources when developing goals is very important. Of course, budgets change and some things – like a global pandemic – are out of the control of jurisdictions and agencies. Establishing goals that, barring an emergency, have funds available to achieve them is essential. In addition, program participants are encouraged to seek out new funding sources to support these goals where possible. Working with partners to leverage other resources, applying for grants from foundations and universities, and/or seeking federal or state funding, where available, are all potential resources that can support fair housing goals.
    - **Do we have the necessary staff to implement this goal?** Hiring adequate staff can be very difficult. Without staff to implement the strategies to meet defined goals, it is very unlikely to happen! Therefore, carefully consider whether your jurisdiction or agency has adequate staffing, or can reallocate staff, to implement the goal before putting it in your fair housing plan.
    - **Do we have the authority to implement the goal?** Many HUD program participants have developed innovative fair housing goals with partner agencies in fields such as education and economic development. But once the fair housing plans were created, the program participants realized that it was quite difficult to follow up on and implement those goals because they had no direct authority over their partners. To be clear, program participants should work with other city departments, PHAs, and school districts, given the impact of housing on so many other aspects of well-being. But just make sure, before you submit a goal, that you have buy-in from your partners to implement the goal.
    - **Is there political will to implement the goal?** Ensuring you have general support from elected officials for the goals in your plan is very important for implementation. As described in previous sections, working with elected officials *early and often* to increase their

awareness of the importance of fair housing and obligation to affirmatively further fair housing can improve political buy-in. If you do want to include a goal that may be difficult politically, make sure to include a plan to build political support.

- **Time-bound:** A goal without a deadline is no goal at all. When setting your goals, identify both when the goal should be *completed*, and as noted above, metrics and milestones to achieve *along the way*. To take the example above, having residents move into fifty units of affordable housing in high opportunity areas within three and a half years is a time-bound goal. That goal has a deadline. But to achieve it, make sure to set milestones along the way as well, as outlined above, on a cadence that makes sense for your particular goal, such as quarterly milestones for achievement.

Get SMART(ER) in Your Goal Planning:

When thinking through your fair housing goal planning, consider adding the following steps to the SMART framework:

Evaluate: Ensure your goals are evaluated during the implementation of strategies to meet them. Evaluation is about reviewing and reflecting. Ask yourself what's working or not, what's gone well or hasn't, what's gotten in your way, and what's been helpful along the way.

Revise/Readjust: Revision responds to evaluation, so these two stages go hand-in-hand. As you evaluate, determine whether goals should be revised. What should be changed about goals and what should be kept the same? How can you ensure better results for future goal planning? Are there different metrics that better represent performance? Do other or additional people need to be included on these goals? If, for example, you find yourself pursuing a goal but continuously hitting a brick wall, readjust your method and techniques.

Examples of SMART Goals

Example #1: New Orleans, LA

New Orleans' fair housing plan had several goals with specific metrics and milestones based on a key barrier the city identified with respect to fair housing access: risk of displacement. For example:

- ***Stabilize neighborhoods vulnerable to gentrification by preserving existing ownership and affordable rental housing and developing affordable home-***

ownership and rental housing. Utilize Housing Authority of New Orleans (HANO) scattered sites inventory in gentrifying areas to develop affordable single family homes.

- Develop 45 on-site homeownership units (1/3 affordable) at Faubourg Lafitte in the gentrifying neighborhood of Treme by 2018.
- Target development of 5+ affordable single family homes utilizing HANOs scattered sites in Treme.
- Target development of 5+ affordable single family homes utilizing HANOs vacant scattered sites in Carrollton.
- Develop 5+ affordable single family homes utilizing HANOs vacant scattered sites inventory in Upper 9th Ward. (Actual number of homes developed dependent on financing and the housing market. Number of homes could be more or less than the target).

What is so SMART about this goal? First, it is specific and measurable: it lists specific numbers of units to be built in specific communities. Second, it is action-oriented: although it expresses a broad goal in its first line – stabilizing neighborhoods vulnerable to gentrification – it then follows that with a specific plan to achieve it. Third, it is realistic: the city of New Orleans submitted this goal in conjunction with the HANO, meaning the agency had statutory authority to achieve it, and they also note that these numbers could shift depending on market conditions. How could this exemplary goal be further improved? By setting milestones to reach each of these targets and identifying funding sources and staff to implement the plan.

Example #2: Kansas City, MO

Kansas City also had a number of goals with specific milestones. For example:

- ***Develop model zoning code for smaller homes.*** In 2019, MARC [the Mid-America Regional Council] will work with the five cities to develop model codes using its sustainable code framework that address siting smaller homes on smaller lots and encouraging small scale multifamily projects in retail and residential areas. Once developed and reviewed by cities, MARC will present it to local government planning committees and elected officials starting in 2019. By facilitating the development of smaller single family and multifamily housing the model codes will provide more information to cities to guide decisions about ways to support affordable housing opportunities in more places around the metro area and in communities, and provide additional access for protected classes to opportunities. MARC will develop model codes that would allow local governments to encourage smaller homes on smaller lots in some locations and also

facilitate the construction of small (4-12 units) multifamily projects in appropriate residential and commercial areas. They will then provide a series of presentations to planners, planning commissions, and elected officials on the merits of the model codes.

Can you identify what is SMART about this goal?

First, it is specific and measurable, listing the number of cities (5) the regional planning organization (MARC) will work with and the number of units (4-12) it will produce to address the broader overall goal. It also importantly lists milestones along the way for each goal, showing how the organization will achieve it. And it has a plan for securing political buy-in for the plan through meetings with local officials.

Example #3: Chester County, PA

- ***Provide more diverse housing opportunities and encourage mobility among low-income residents living in areas of poverty, particularly among those in Coatesville's racially and ethnically concentrated area of poverty (R/ECAP)***. Decrease vouchers in City of Coatesville from 43.9% to 39% of total under issuance and lease in Chester County (rate is averaged at 1% per year). Conduct annual evaluation of housing choice voucher locations to monitor mobility efforts.

This goal is exemplary because it is very specific about its measure of success – a precise percentage decrease (43.9% to 39%) in voucher holders in a particular R/ECAP. It also points to a specific decrease in the percentage that the program aims to achieve each year – in other words, milestones. And because Chester County submitted a joint fair housing plan with the Housing Authority of the County of Chester, the County could feasibly implement this goal – and monitor its progress. Chester County's most recent **CAPER** indicates progress towards this goal, with 40.1% of vouchers in the City of Coatesville in 2021.

After you develop SMART goals like those above, you should then re-introduce those goals to community members to discuss the potential goal priorities and consider a re-evaluation of goal priorities based on feedback. This type of iterative process enables goals and priorities to align with the needs and concerns of the community participation process, as well as the obligations of the Fair Housing Act.

Tracking and Reporting Progress

Setting fair housing goals often represents the culmination of a months-long process of outreach and analysis. After goals are finalized, program participants should establish processes to track and report their progress. By doing so, they can regularly assess if their efforts are effective or whether changes are needed. Additionally, to promote accountability, program participants should regularly report their progress in achieving goals – both to HUD and to community stakeholders. **Through effective tracking and reporting, you can ensure that fair housing planning results in more inclusive communities with greater access to opportunity for its residents.**

Benefits of Successful Fair Housing Tracking

Regular and careful tracking is an important way to determine if your goals are translating to real-world progress. Meaningful fair housing goals typically involve several strategies, implementation partners, milestones, and metrics. Without an intentional process in place to track progress, and given competing demands on staff, the implementation of strategies easily be neglected or abandoned.

Tracking also creates a framework for remaining accountable to goals. For many jurisdictions, maintaining a commitment to goals for the duration of their lifespan can be difficult amid changing circumstances. Routinized tracking practices insulate fair housing efforts by encouraging staff and partners to stay focused on their original goals.

Leveraging Successful Data Tracking

After completing an Assessment of Fair Housing in 2016, El Paso County, Colorado developed effective procedures for tracking progress on each of their goals. The county then used this data to inform local grant funding, allocating resources to organizations that could advance goals on which El Paso was not making sufficient progress.

Further, **tracking creates opportunities for continued improvements to current and future fair housing strategies.** By staying up to date on implementation progress and examining what has prevented individual goals from being achieved, program participants can adjust and ensure progress is ultimately made, such as by realigning resources. Additionally, by examining what has enabled successful implementation of fair housing activities, program participants can apply lessons learned to

future goals and implementation strategies. Finally, a continuous process of tracking AFFH goals will make it much easier to summarize your progress in later fair housing plans.

Successful Tracking Practices

There is no one-size-fits-all approach to successful fair housing tracking. The process you design will depend on the number of staff, implementation partners, goals, and resources devoted to fair housing activities. However, all program participants should develop procedures that are:

- **Comprehensive:** All metrics and milestones of a goal are tracked
- **Structured:** All parties involved with implementing a goal know how and when to report data
- **Flexible:** Tracking procedures are designed to evolve in response to emerging circumstances, such as shifts in funding or program procedures

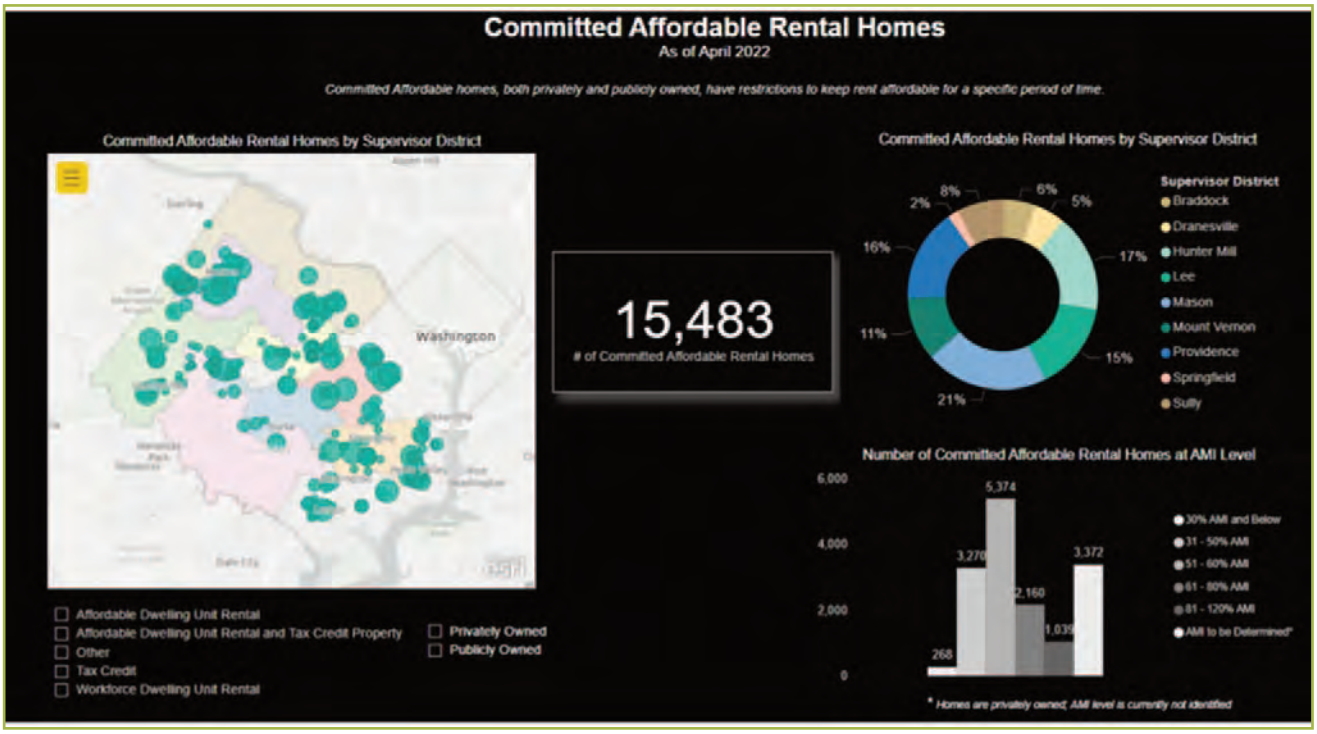
Each partner that supports implementation of a fair housing goal should collect quantifiable data about their progress. If a program participant sets SMART goals, as discussed in earlier in this section, the kind of data to collect should be pre-established. Because some fair housing initiatives take a long time to implement, you should always consider monitoring interim steps. For example, imagine a city that proposes to create 250 units of affordable housing in a high opportunity neighborhood. The city should track the number of units created over a given period to monitor their progress. However, their tracking could take several forms, at varying levels of detail.

- **Good:** The city collects and reports data on how many units have been created on a semi-annual basis.
- **Better:** The city also reports on intermediate steps involving local government, such as the approval of building applications.
- **Best:** The city tracks every significant step in the building process, including those for which local government staff are not directly involved (e.g. breaking ground).

Some goals rely on more qualitative assessments, such as increasing coordination with a housing partner or stakeholder. Even if no numerical data is available for these metrics, you should still collect information to track their progress. This can be as simple as holding a meeting or call with the parties involved to discuss what has been accomplished and what remains to be achieved.

As each effort supporting a fair housing goal generates data, a successful tracking process will gather and organize this information. You should designate a staff member who is responsible for collecting data from each partner and arranging it into a single, cohesive framework. This can be as simple as creating one spreadsheet that combines top-level data from every program advancing a fair housing goal. Staff in charge of data collection should establish consistent schedules and standards for how partners report their data, for instance, requesting quarterly or semi-annual updates.

Many jurisdictions also create data dashboards, which combine many data sources into a single display. Dashboards can be generated with relatively little effort through programs like Excel and Tableau and make data much easier to relay to the public, elected officials, and other stakeholders.



Fairfax County, Virginia uses this dashboard to track and share progress on its fair housing goals around affordable housing. **View and interact with the dashboard**.

Collecting data is only useful if you apply the information to improve implementation efforts. While a single person is often capable of handling data collection and organization, program participants need a broader team to translate this information into applicable feedback. Many jurisdictions create steering committees which meet to discuss fair housing goals and make recommendations to address areas where progress is not being made. These committees should include representatives from all implementation partners. Many localities also have success in including other stakeholders, such as

elected officials and housing advocacy groups, on their steering committees. These groups can provide additional perspectives and external accountability for tracking fair housing goals.

Program participants should also communicate their progress to the public. Transparent reporting raises public awareness of fair housing efforts and creates an additional source of accountability. Dashboards and reports are the most common ways of communicating progress, but you should actively promote and share them in order to reach a significant audience. Public meetings and events are also useful, allowing staff to share progress and hear from residents about their own experiences, which may not be captured by existing data.

Because of the complexity of implementing fair housing goals, **basic tracking protocols should be developed during the planning process itself.** As you consider the "measurability" element of a SMART goal, create a baseline plan for how it will be tracked in practice. This plan does not have to be static, and in fact should evolve as implementation begins. However, having a basic framework in place from the start can avoid confusion and foster an awareness of tracking's importance before work begins.

Challenge: Tracking Goals in a Unified Plan

Creating tracking plans beforehand is especially important for unified plans, in which multiple program participants collaborate on fair housing goals. Coordination between program participants often fades after a unified plan is finished, especially if they do not have a long-standing relationship to begin with. Without a pre-established system for tracking goals together, each program participant may revert to working individually and lose the benefits that come from cooperation.

Reporting on Fair Housing Goals

Fair housing planning often supports a program participant's wider planning process for HUD entitlement programs. As a result, fair housing goals may be entangled in HUD-funded activities that localities are required to report on annually. Required reporting can be useful, providing a framework for analyzing data and setting deadlines that tracking efforts can be built around. However, you should be aware of the limits of existing reporting formats.

At present, there is no requirement that for reporting to HUD about progress on fair housing goals as such. However, since program participants often incorporate fair housing goals into their Consolidated Plans, they document progress on them through Consolidated Annual Performance and Evaluation Reports (CAPERs). Unfortunately, CAPERs are not designed for reporting on fair housing goals. Instead, the reports are intended to document HUD-funded activities, so there is often no way to report on fair housing activities that are either unfunded or funded by non-federal sources. For goals that go beyond traditional housing activities, there may not even be a code in the Integrated Disbursement and Information System (IDIS) for entering it into a CAPER at all.

Challenge: Reporting on Goals for a Unified Plan

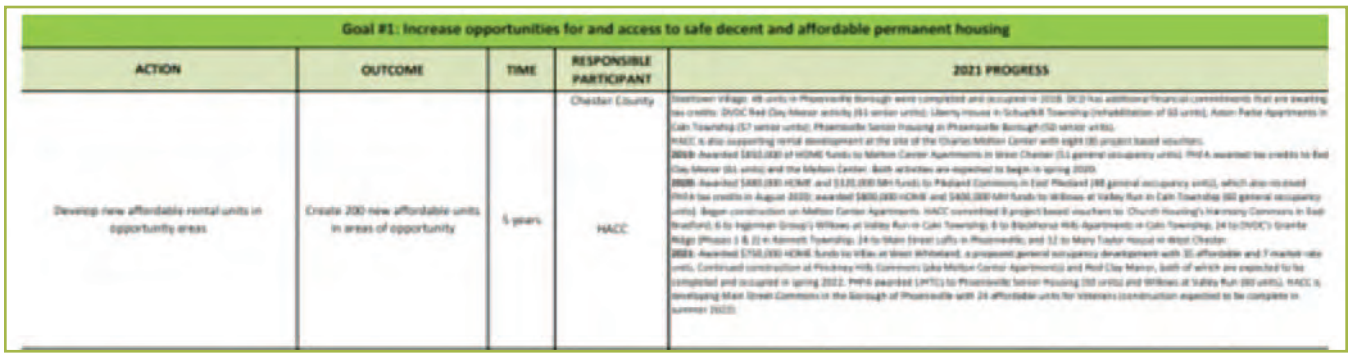
Fair housing goals in unified plans often combine the efforts of multiple program participants. At present, however, each program participant must submit its own annual CAPER to document work on HUD-funded programs. This separation makes it difficult to report on fair housing goals for which multiple localities are cooperating. Collaborating entities should be especially diligent in developing their own tracking and reporting standards to ensure a continued commitment to fair housing goals by all parties involved.

To avoid these limitations, many program participants include fair housing supplements in their CAPERs. They provide descriptions of progress on their fair housing goals in an appendix, while documenting programs funded by HUD within the CAPER table template. Though flexible, reporting on fair housing goals in this manner frequently leads to confusion. In supplements, program participants often report only on goals where progress has been made, while dropping others altogether. In past reporting, some program participants have reported different sets of numbers between their supplements and the main body of their CAPER, creating confusion about how much progress had truly been made.

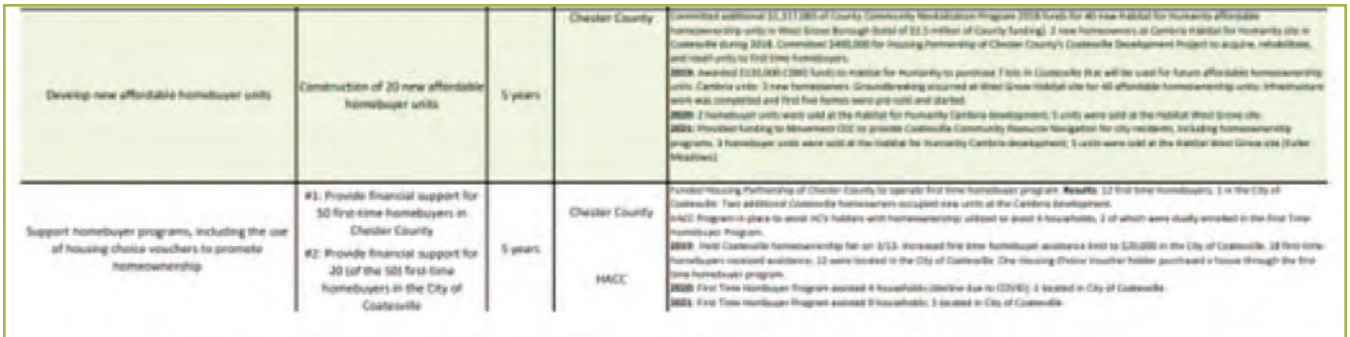
Whether disseminated through CAPERs or other documents, successful fair housing reports share several common features:

- **Comprehensive:** All fair housing goals are reported on, regardless of how much progress has been made.
- **Specific:** The report provides data at the metric level, detailing every implementation effort within a given goal.
- **Contextual:** The report includes enough text to make sense of numerical data and provides background information on factors that influenced how much progress was made.
- **Non-Repetitive:** The report does not repeat language from one report to the next, making it easy to tell what progress took place in a given year.

Chester County, Pennsylvania offers a model for effective fair housing reporting. In the county's CAPERs, staff include a table that breaks down progress on every metric of every fair housing goal. The table provides an overall summary for each action, and details the progress made during the past year as well as during previous reporting periods.



Goal #1: Increase opportunities for and access to safe decent and affordable permanent housing				
ACTION	OUTCOME	TIME	RESPONSIBLE PARTICIPANT	2021 PROGRESS
Develop new affordable rental units in opportunity areas	Create 200 new affordable units in areas of opportunity	5 years	Chester County HACC	[illegible]



Develop new affordable homebuyer units	Construction of 20 new affordable homebuyer units	5 years	Chester County	Committed additional $1,317,000 of County Community Revitalization Program 2018 funds for 40 new Habitat for Humanity affordable homeownership units in West Grove Borough (total of $3.5 million of County funding). 2 new homeowners at Cambria Habitat for Humanity site in Coatesville during 2018. Committed $400,000 for Housing Partnership of Chester County's Coatesville Development Project to acquire, rehabilitate, and resell units to first time homebuyers. 2019: Awarded $150,000 (CDBG funds) to Habitat for Humanity to purchase 7 lots in Coatesville that will be used for future affordable homeownership units. Cambria units: 3 new homeowners. Groundbreaking occurred at West Grove Habitat site for 40 affordable homeownership units. Infrastructure work was completed and first five homes were pre-sold and started. 2020: 2 homebuyer units were sold at the Habitat for Humanity Cambria development; 5 units were sold at the Habitat West Grove site. 2021: Provided funding to Movement CDC to provide Coatesville Community Resource Navigation for city residents, including homeownership programs. 3 homebuyer units were sold at the Habitat for Humanity Cambria development; 5 units were sold at the Habitat West Grove site (Fuller Meadows).
Support homebuyer programs, including the use of housing choice vouchers to promote homeownership	#1: Provide financial support for 50 first-time homebuyers in Chester County #2: Provide financial support for 20 (of the 50) first-time homebuyers in the City of Coatesville	5 years	Chester County HACC	Funded Housing Partnership of Chester County to operate first time homebuyer program. **Results**: 12 first time homebuyers, 1 in the City of Coatesville. Two additional Coatesville homeowners occupied new units at the Cambria development. HACC Program in place to assist HCV holders with homeownership; utilized to assist 4 households, 2 of which were dually enrolled in the first Time Homebuyer Program. 2019: Held Coatesville homeownership fair on 1/13. Increased first time homebuyer assistance limit to $20,000 in the City of Coatesville. 18 first-time homebuyers received assistance; 12 were located in the City of Coatesville. One Housing Choice Voucher holder purchased a house through the first time homebuyer program. 2020: First Time Homebuyer Program assisted 4 households (decline due to COVID); 1 located in City of Coatesville. 2021: First Time Homebuyer Program assisted 9 households; 1 located in City of Coatesville.

View a **model reporting format** from Chester County, Pennsylvania's 2021 CAPER.

Though fair housing reporting is not currently mandated by HUD, it is essential for understanding and communicating efforts to affirmatively further fair housing. If founded on an effective tracking system, reports sustain fair housing goals by keeping implementation partners focused and accountable while completing them.