

Assessment of Fair Housing: Tips for Completing, Submitting, and Getting Accepted

*Leah Eppinger, AICP – Housing Authority of the
County of Dauphin*

Ira Mabel – Mullin & Lonergan Associates

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What's an AFH?

Purpose of AFFH Rule

- Fair housing planning rule
- Clarify existing fair housing obligations
- Set locally-determined fair housing priorities and goals
- Connect fair housing planning to subsequent community planning and development via the Con Plan, Annual Action Plans, and PHA Plans
- Set up a framework for taking meaningful actions to affirmatively further fair housing
- Identify applicable program participants

Components of the AFH

- Analysis of HUD-provided data, local data, and local knowledge related to fair housing issues:
 - Analysis of Segregation and Integration;
 - Analysis of Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs);
 - Analysis of Disparities in Access to Opportunity;
 - Analysis of Disproportionate Housing Needs;
 - Analysis of Publicly Supporting Housing;
 - Analysis of Disability and Access, and
 - Assessment of Fair Housing Enforcement, Outreach Capacity, and Resources.

AFFH-T

- Get into the tool early
- Updates have been made to the tool as of July 2016 – new data documentation will be available soon
- If you start early, make sure you note when the data was pulled from the tool – if updates were made the reviewer will need to know what data you are analyzing
- Can use the maps and tables for your public outreach
- Data can be hard to load due to size – can be downloaded to local servers and viewed in ArcGIS
- When looking at dot maps make sure you are comparing apples to apples (dots should represent same number of people)

Goals, Metrics and Milestones

- Make achievable with implementable timelines
- Consider using partner organizations to implement but can only assign tasks to plan participants
- Use HUD format
- Less goals with tiered implementation strategies
- Show work on how you prioritized goals
- Can use goals that are out of your control but not your influence

Goal Example

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
<p>Revise CDBG and HOME grant application procedures to increase the number of funded projects that AFFH</p>	<p>Location and type of affordable housing</p> <p>The availability of affordable units in a range of sizes</p>	<p>Disparities in Access to Opportunity</p> <p>Disproportionate Housing Needs</p>	<p>Within 2 to 3 years, revise the CDBG and HOME application forms to require applicants to discuss how their project addresses the fair housing issues identified in the AFH and/or how the proposed project will contribute to furthering fair housing choice.</p> <p>Within 2 to 3 years, incorporate scoring criteria and an associated number of points into the CDBG and HOME project scoring sheets that evaluates the degree to which projects work to AFFH.</p>	<p>Dauphin County</p>
<p>Discussion: Because counties in Pennsylvania do not have land use control, Dauphin County’s strongest leverage to achieve any of the goals in this AFH is through the design and implementation of its funding programs. Program design presents the opportunity to insert fair housing best practices at the ground floor of any community development activity. Dauphin County will use its annual funding application process to encourage activities that AFFH. In addition, the County will effectively focus the internal policies, procedures, and management of its HUD and other programs in a way that efficiently and consistently affirmatively furthers fair housing choice.</p>				

Assessment of Fair Housing Timeline for Program Participants and PHAs

		Complete by day/Month													
Category	Task	1	15	30	45	60	75	90	105	120	135	150	165	180	
		Months 1			Month 2			Month 3			Month 4		Month 5		Month 6
Preparation	Have an understanding of the AFH development process														
	Decide on single program participant submission or joint/regional submission														
	Identify lead applicant														
	Determine deadline for AFH submission														
	Identify relevant organizations and stakeholders														
	Develop Written Agreement to collaborate														
	Notify HUD of collaboration and provide HUD with Written Agreement														
	HUD approves collaboration (if necessary)														
	Develop supplemental community participation process timeline (optional)														
Update applicable community participation plan to reflect AFFH rule															
Local Data and Knowledge / Community Participation	Login and create AFH in the User Interface														
	Review existing local and regional plans														
	Consult with relevant organizations and stakeholders														
	Conduct outreach activities														
	Conduct resident meetings and public hearings														
	Summarize feedback and compile data														
	Draft Community Participation Process														
	Internal Review draft of Community Participation Process														
Maps and data analysis	Incorporate feedback into draft														
	Review previous Analysis of Impediments (AI)														
	Assess past goals and actions														
	Draft section on Past Goals and Actions														
	Assess fair housing issues using the Assessment Tool, data and maps, and local knowledge														
Draft AFH	Completion of preliminary maps and data analysis														
	Draft the eight sections of the Fair Housing Analysis														
	Draft Contributing Factors for each of the eight sections of the Fair Housing Analysis														
	Draft Fair Housing Priorities and Goals														
	Draft metrics, milestones, and timeframes for achieving priorities and goals														
	Complete Guidebook Appendix A: AFH Checklist and Worksheet (optional)														
	Internal review draft of Fair Housing Analysis, Contributing Factors, and Priorities and Goals														
Community Input / Public Comment	Incorporate feedback into draft														
	Draft Cover Sheet and Executive Summary														
	Publish proposed draft AFH and all accompanying data														
	Conduct resident meeting or public hearing														
	Public comment period ends (30 days)														
Finalize AFH and Submit to HUD	Consider recommendation of the Resident Advisory Board (PHA only)														
	Compile and respond to comments														
	Incorporate comments into AFH														
	Finalize AFH														
	AFH approving authority signs AFH and certifications														
	Submit AFH to HUD via the User Interface														

Assessment of Fair Housing Timeline for Program Participants and PHAs

		Complete by day/Month																																
Category	Task	1	15	30	45	60	75	90	105	120	135	150	165	180	195	210	225	240	255	270	285	300	315	330	345	360								
		Months 1	Month 2				Month 3			Month 4			Month 5			Month 6			Month 7			Month 8			Month 9			Month 10			Month 11			Month 12
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Top Tips for a Successful AFH

Getting Started

- 1. Make a detailed Project Schedule (and stick to it)**
 - Collaborate with regional partners (city, county, PHA) to complete schedule
- 2. Amend your Citizen Participation Plan**
- 3. Review the HUD webinars**
- 4. Finalize your Community Engagement Plan**
- 5. Identify stakeholders and local data sources**
- 6. Process all data up front**
- 7. Prepare for submission first, not last**
- 8. Draft the document using the Assessment Tool**
- 9. Make adjustments according to local context**
- 10. Set goals to fit your 5-year CP**

Project Planning and Schedule

- AFH and Five-Year Consolidated Plan/Agency Plan are not two separate things
- Community engagement, data analysis, goal setting, budgeting, project selection, etc. should all be treated as one single process
 - Foresight and cohesion can be assets
- From start to finish, the AFH process takes much, *MUCH* longer than you might think, especially if collaborating with regional partners
 - M&L's schedule template: mandl.net/what-we-do/fair-housing

Community Engagement

- Do as much as possible!
- Be as creative as possible
 - Public meetings in different locations, targeting different groups
 - Partner with local organizations and use their membership, clientele, listserves
 - Website, online surveys, social media, radio ads, newspaper ads, direct mailers
 - Use foreign language materials, ads, translators, surveys based on your LAP
- Don't overlook your regulars
 - Resident Advisory Board, FHIP/FHAP
- Continuously rolling process

Drafting the Document

- Read the tool and the guidebook completely before starting
 - Don't forget the appendices—lots of helpful stuff in them
- **Stick to the questions!**
- Keep the UI in mind when wording narrative responses and adding extra elements
 - Set up an AFH in the UI, click through the screens to become familiar with the format
 - Make sure you're using the most recent version
- Check for internal consistency. Then double check.
 - Analysis → Contributing factors → Goals

Goal Setting

- It's common to want to hedge or be vague to maintain flexibility and limit chances of failure
 - Sorry, tough luck
 - Remember S.M.A.R.T.
- It's also common to include many goals (even ones outside your influence) to cover your bases
 - Fewer SMART goals are better than many unrealistic goals
- These need to be treated as a pre-step to consolidated plan goals, as if they'll be budget line items
 - Are you going to fund it in your 5-Year Plan? If not, don't make it a goal
 - Follow HUD's example format

(Non-)Acceptance & Technical Assistance

HUD Feedback

- Will receive a letter from HUD – 45 day review period
 - Accept letters may contain detailed critique about what could be done better next time
 - Non-accept letters will include detailed explanation of why and will include examples of what should have been done differently
- HUD will follow up with a phone call to answer questions from the letter
- Most non-accepts from the first round were due to metrics/milestones

Technical Assistance

- **FREE!**
- Two Types: On Call and In Person
- Ask for TA early if you think it will be helpful – must be approved by HUD DC
- Be specific as possible: data analysis, goal setting, community outreach

leppinger@dauphinhousing.org
iram@mandl.net
