



City of Columbia

701 East Broadway, Columbia, Missouri 65201

Department Source: Community Development - CDBG/Home

To: City Council

From: City Manager & Staff

Council Meeting Date: December 18, 2017

Re: U.S. Department of Housing and Urban Development Affirmatively Furthering Fair Housing (AFFH) Requirements

Executive Summary

This Council Report provides a preview of the U.S. Department of Housing and Urban Development (HUD) requirements for the City of Columbia, the HUD Assessment of Fair Housing (AFH) Tool, recommended timeline, summary of how results of the AFH should inform the next Community Development Block Grant (CDBG) and HOME Consolidated Plan, and recommended outline for a public engagement process. Affirmatively Furthering Fair Housing (AFFH) is a legal requirement that federal agencies and federal grantees further the purposes of the Fair Housing Act. The intent of this report to inform Council on these federal requirements and receive feedback and direction on the draft public engagement process outlined within this report.

Discussion

The City of Columbia is classified by HUD as an Entitlement Community and Participating Jurisdiction due to its population and demographics, therefore it receives an annual formula based allocation of CDBG and HOME funding. Entitlement Communities are mandated by HUD to meet federal requirements to Affirmatively Further Fair Housing (AFFH). This requirements was previously met by completing the HUD required "Analysis to Impediments to Fair Housing Choice" document. HUD's final rule was published in the Federal Register on July 16, 2015 and outlines additional guidance for communities regarding their requirements to meet fair housing requirements.

As provided in the rule, AFFH means "taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

AFFH requirements are intended to help communities address discrepancies in housing needs and to enhance community involvement. This process is legally required, will help to ensure the City of Columbia reviews appropriate data for the communities it serves, and will allow City leaders to more clearly see gaps in the provision of fair housing. Upon completion of the AFH, the City of Columbia will have further understanding of fair housing needs and the most appropriate actions to be taken in order to address those needs.



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HUD requires the completion of its Assessment of Fair Housing (AFH) Tool to demonstrate compliance with AFFH. City staff reviewed the required subject areas to be analyzed as a part of the AFH process, which are as follows:

1. Assessment of Past Goals, Actions and Strategies.
2. Demographic Summary.
3. General Fair Housing Topics.
 - a. Segregation/Integration
 - b. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)
 - c. Disparities in Access to Opportunity: (Education, employment, transportation, low poverty exposure opportunities, environmental concerns, access to opportunity)
 - d. Disproportionate housing needs
4. Publicly Supported Housing Analysis.
5. Fair Housing Enforcement.
6. Fair Housing Goals and Priorities.

Results of the AFH are intended to inform affordable housing policies and to inform the manner in which the City of Columbia will allocate its CDBG, HOME and local resources to address affordable housing and community development needs within its 2020-2024 Consolidated Plan. HUD regulations require that the City of Columbia complete its AFH and submit to HUD by April 1, 2019.

City staff has spoken with HUD field office staff, national consulting firms with expertise in assisting communities in completing the AFH process (Enterprise Community Partners, Grounded Solutions Network) and other cities that have completed the AFH process and received common feedback recommending a robust public involvement process as a part of completion of the tool and submission to HUD. City staff is providing this preliminary report to Council in order to inform Council of our requirements, recommend a process for public engagement and receive feedback and direction from Council on the draft public engagement process.

City staff proposes creating a Fair Housing Task Force consisting of a broad stakeholder group for the following purposes:

1. Assist staff in refining the AFH public engagement process and conducting outreach.
2. Analyze required fair housing data presented by staff and local partners.
3. Review public input collected throughout the public engagement process.
4. Provide recommendations to Council for Fair Housing Goals and Priorities.

The two key deliverables of the Fair Housing Task Force would as follows:

1. Provide recommendations for City policies that promote and further fair housing.



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2. Provide recommendations on the use of CDBG, HOME, other HUD Sources and local funds in a manner that promotes and furthers fair housing and informs the 2020-2024 Consolidated Plan.

City staff proposes the following stakeholders groups be considered to serve on a City Council appointed Task Force:

- 2 Council Co-Chairpersons
- 1 Community Development Commission Member
- 1 Columbia Community Land Trust Board Member
- 1 Planning and Zoning Commissioner
- 1 Human Services Commission Member
- 1 Disabilities Commission Member
- 1 Board of Adjustment Member
- 1 Columbia Housing Authority Staff Member
- 1 Columbia Board of Realtors Representative
- 1 Columbia Apartment Association Representative
- 1 Social Services Provider Representative
- 1 Home Builders Association Representative
- 1 NAACP Representative
- 1 Central City Resident Representative living in Census Tract 9, 21, or 7

City staff proposes the following as a tentative draft schedule subject to input from the Fair Housing Task Force, should the Council approve proceeding in this manner:

February 2018	City Council Authorize moving forward with implementing a Fair Housing Task Force.
March 2018	Fair Housing Task Force Members are identified and appointed by the City Council.
April 2018	Fair Housing Task Force Meeting, Kick-Off: Introductions, defining of roles, Assessment of Past Actions and Strategies: 2014 Analysis of Impediments to Fair Housing, 2015-2019 Consolidated Plan, 2008 Affordable Housing Policy Task Force Report, 2015 Affordable Housing Symposium Report.
May 2018	Fair Housing Task Force Meeting: Public Engagement Process Planning.
June 2018	<u>Public Engagement Meeting:</u> Segregation/Integration and Racially or Ethnically Concentrated Areas of Poverty.
July 2018	Fair Housing Task Force Meeting: Review of data and public input from June 2018 public engagement meeting: Common themes, potential areas to focus attention.



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August 2018	<u>Public Engagement Meeting</u> : Disparities in Access to Opportunity, Disproportionate Housing Needs.
September 2018	Fair Housing Task Force Meeting : Review of data and public input from August 2018 public engagement meeting: Common themes, potential areas to focus attention.
October 2018	<u>Public Engagement Meeting</u> : Disability and Access public input meeting.
November 2018	Fair Housing Task Force Meeting : Review of data and public input from August 2018 public engagement meeting: Common themes, potential areas to focus attention.
December 2018	Fair Housing Task Force Meeting : Analysis of publicly supported housing and presentation by Columbia Housing Authority staff. Fair Housing Enforcement, Outreach Capacity, and Resource Analysis.
January 2019	Fair Housing Task Force Meeting : Review of all common themes and potential areas of focus. Formulation of recommended policies and goals.
February 2019	Fair Housing Task Force Meeting : Final review and approval of recommended policies that promote fair housing and recommendations on the use of CDBG, HOME, other HUD Sources and local funds in a manner that promotes and furthers fair housing.
March 2019	City Council considers completed AFH document for approval.
April 2019	City staff submits final approved AFH to HUD.

Fiscal Impact

Short-Term Impact: None

Long-Term Impact: None

Strategic & Comprehensive Plan Impacts

Strategic Plan Impacts:

Primary Impact: Social Equity, Secondary Impact: Operational Excellence, Tertiary Impact:

Comprehensive Plan Impacts:

Primary Impact: Livable & Sustainable Communities, Secondary Impact: Mobility, Connectivity, and Accessibility, Tertiary Impact: Land Use & Growth Management



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Legislative History

Date	Action
10/7/2014	City Council adopted the City of Columbia's Analysis of Impediments to Fair Housing Choice within the 2015-2019 Consolidated Plan.

Suggested Council Action

Review the report and attached HUD documents. Provide feedback to staff with regards to the public draft public engagement process.