FHEA Resource:
Emerging Practice in FHEA Development

This document is intended to serve as a resource for Grantees, providing examples of ways that other Grantees have addressed various elements of the FHEA requirement. As this is an emerging practice, the FHEAs referenced in this document are still in draft form and have yet to be finalized by the Grantees or approved by OSHC. Inclusion of the referenced FHEAs is not a tacit endorsement but are a demonstration of the various elements that Grantees have included in their analysis. We thank the referenced Grantees for their willingness to share their drafts, and appreciate the work of all Grantees on this groundbreaking initiative.

Data Analysis

Data Prompt 1:
Background: Provide overview and description of the current racial/ethnic demographics and the political, social, legal and economic context for the development of racially-concentrated communities within the context of the history of the region.

Suggested Elements:
- *High level snapshot of current demographics through fair housing lens; include high level demographic table for major cities and region*
- *Density map by race/ethnicity for major cities*
- *Overview of economic trends in region, including unemployment rate, top employers, and recent trends in job gains/losses by sector.*
  - *Identify the origins of racially-concentrated neighborhoods and communities and the official policies, unofficial practices, and other actions that may have led to or caused racial concentration.*
  - *Describe historical demographics and highlighting of significant civil rights/fair housing related problems*
- *Identify the origins of racially-concentrated neighborhoods and communities and the official policies, unofficial practices, and other actions that may have led to or caused racial concentration.*
- *Identify the most prominent features and problems in the region*
- *Description of anticipated major changes that will alter the background context for the region. Include discussion of recent, ongoing, or promised major public investments and, recently passed laws, reforms, or major policy changes (at all levels of government) whose impacts have not yet been felt.*
- *These discussions should mention the potential impacts on traditionally marginalized communities.*

Grantee Examples:

1. MAPC (Boston): See pages 7-17. Strong job providing high level snapshot of current demographics for the region, particularly in describing the state of racial separation and concentration. Interesting approach of counting households v. people when looking at housing demand. Would be helpful to see a visual representation, i.e. density map.

2. Kansas City RAI: See Section II Grantee is working with a consultant to build onto their existing RAI with the pieces of the FHEA that are missing. Provided data on the protected classes in terms of trends/makeup for each county/city included in the region, and provided maps that showed the spatial concentration of each

group. The section would benefit from inclusion of the implications of the demographics and the concentrations: what does this mean for fair housing and opportunity for these groups? Similarly, the employment/economic analysis looks at the top industries (but not growth trends) and consider wages as well as housing affordability, but there is no unifying thread on why these considerations are important. It would also be beneficial to break out the demographics of the analysis included in this section, for example, unemployment rates, or housing affordability issues.

The policies/practices section of the RAI outlines the policies adopted by each of the public housing authorities. They identify preferences among subsidized housing as well as identify the barriers that these present for particular groups. There are clear implications and causes that can be pointed to, but are not discussed in this section. They include an analysis of the expiration of Section 8 contracts in the metro area, as this is a looming issue, but could be stronger if they also provided the actual numbers. Great potential for discussion and policy implications. (see Sec. V, page 12)

3. Chittenden: See pages 20-21: Uses the National Low-Income Housing Coalition's "housing wage" - the income needed to pay prevailing rents. This alternate data source helps communicate the challenge of affordability in the region's housing market. Pages 26-28 focus on the housing needs of recent refugees for units with 3+ bedrooms.

4. Baltimore: See page 4 to 5: Concise but thoughtful overview of the political background. Page 6 to 11; Good use of data. Very thoughtful analysis and provides interesting time-series comparison through the history. It also breaks down the data by races and jurisdictions.

5. Thurston County: See pg 8 - Good table that shows protected classes by jurisdiction.

6. CMAP (Chicago): See pages 9-10; careful examination of the region's demographic data with compositions of races for each county. Also provides trends and predictions of the demographic situation. Page 11-12; detailed analyses of demographic data with economic and income compositions by county; provides trends and patterns of poverty rates and income per capita by county and by race; good use of secondary source on economic profile of households and employment status by races; presented secondary sources on income level as compared to housing options in the market. Tables well-presented and easy to use; Page 37 -38: briefly examines the social and political history of the region, and identifies historical discriminative policies.

Strong Components
● Good use of creative data/maps that are easy to read.
  ○ Time series and/or trends analyses help convey a snapshot as well as a historical view of changes over time
  ○ Density maps help convey a visual representation of racial separation and concentration
  ○ Comprehensive review of fair housing policy, activism, and history
  ○ Discussion of the legacy of discrimination and racism in the region

Common Pitfalls to Avoid/Opportunities for Improvement
● There should be a clear connection between the data and the larger narrative about equity.

Data Prompt 2:

Segregation: Identify and discuss racial/ethnic segregation and integration patterns and trends.

Suggested Elements:
- *List region and major cities' scores on dissimilarity index and predicted racial composition for 2000 and 2010*
- *Compare major cities and metro to similar-sized cities and metros in state and country on these two metrics*

Grantee Examples:
1. MAPC (Boston): See pages 19-26. Strong discussion of segregation data and trends for Boston metro-area. Also looks at racial/ethnic segregation within the context of adjusting for income.

2. Baltimore: See pages 9- 10: Good use of data and interpretations including thresholds and methodology.

3. CMAP (Chicago): See page 15-19: Uses a variety sources of secondary information such as reports and journal articles, but should include methodology and threshold measures.

<u>Strong Components</u>
- Detailed data presentation and discussion
- Description of comments and issues raised by traditionally marginalized communities

<u>Common Pitfalls to Avoid/Opportunities for Improvement</u>

- Data indices and measures need to include a methodology discussion

Data Prompt 3:

   Segregation: Identify contributors and causes of segregation, and provide potential solutions reduce segregation and promote access to integrated communities

Suggested Elements:

- *Analysis of drivers of segregation in region and major cities, with reference to at least a few of the following:*
    - *Siting of affordable housing*
    - *Land or development cost barriers*
    - *Zoning/land use barriers*
    - *Local residency preferences*
    - *HCV landlords lacking*
    - *Land/infrastructure availability*
    - *Tax credit or funding availability to support development*

- - *Lack of code enforcement*
    - *History of the community*
    - *community opposition/NIMBYism*
    - *Hate crimes*
    - *Income discrimination*
    - *Transportation access & investments*
    - *Mobility of potential residents*
    - *Source of income discrimination*
    - *History of redlining*
    - *Remnants of urban renewal*
    - *Lack of access to credit*
    - *Realtor steering by race (with sources cited for each factor)*
- *Discussion of recommended strategies for either major cities or region to overcome segregation (with ideal focus on strategies that can be included in the Regional Plan for Sustainable Development (RPSD)*

Grantee Examples:

1. Kansas City: See Sec 5, p. 13: Provides a land use review for the metro area, looking at Comprehensive Plans for a diversity of housing types but not why this would matter, given demographic/economic situations of region, and fair housing/opportunity. Discusses mixed use goals and lot sizes, but no discussion of their fair housing implications. Discusses housing for persons with disabilities and zoning for these, provides the definition each jurisdiction uses, but no explanation for why we would be interested in this. Discusses fees; building/health/safety codes; accessibility requirements- and the lack of jurisdictions that meet the HUD standard of 5%, but no real discussion about policy implications.

2. MAPC (BOSTON): See *pages 83-90*. Discussion of zoning and land use issues that have contributed to segregation.

3. CMAP (Chicago): page 17, 18, and Chapter 4 page 36-50; Good discussion with rich secondary sources and data on causes of segregation, including economic factors and other barriers to housing choices. Page 44: Discusses NIMBYism and legal perspectives that contributes to segregation.

<u>Strong Components</u>
- Review of land use policy
- Use of secondary sources, such as focus groups, to offer additional insight to the data

<u>Common Pitfalls to Avoid/Opportunities for Improvement</u>

- Need to address multiple elements of contributors
- Need to discuss strategies for addressing contributors
- Provide context for data- why does it matter? What are the implications of this?

Data Prompt 4:

Concentrated Poverty: Identify Racially/Ethnically Concentrated Areas of Poverty (RCAPs and ECAPs)

Suggested Elements:
- *Inclusion of maps delineating where RCAPs and ECAPs are located throughout region and major cities*
- *Description of percentage of total census tracts in region are RCAPs/ECAPs*
- *Description of total population in RCAPs/ECAPs as a percentage of total regional population for each race and ethnicity; maps delineating location of subsidized affordable housing[1] relative to RCAPs/ECAPs*
- *Description of population trends by race/ethnicity and poverty rate from 1990-2010 in RCAPs/ECAPs*
- *Description of other types of housing for special populations in RCAP/ECAPs, such as homeless housing, supportive housing, housing for persons with disabilities*
- *Location of all subsidized affordable housing, including public/assisted housing, LIHTC housing, and location of Section 8 (Housing Choice Voucher) residents*

Suggested elements for Grantees without RCAPs/ECAPs:
- *Identify concentrated poverty areas compared to the medium income level of the region*
- *Identify racially/ethnically concentrated area compared to the regional demographic distribution*
- *Use predicted value index to identify racially/ethnically concentrated areas for each jurisdiction at various income levels*
- *Identify smaller areas within a region, such as a single building, where there is a concentration of race/ethnicity and poverty that is seen as significant relative to the overall size of the region's population or the community in which the concentration exists.*
- *As an alternative, the grantee should identify other geographically concentrated populations that are not participating in public resource allocation processes and/or lacking in income or assets including individuals with limited English proficiency or low educational attainment, single-parent households, homeless and individuals with disabilities*

Grantee Examples:

1. Chittenden, pages 35-37: Even though no census tracts within the region meet the RCAP/ECAP thresholds, the grantee chose to identify census tracts where various racial and ethnic groups are at least double the statewide proportion and in which low and moderate income households comprise at least 50% of the population of the census tract. Could further be improved by discussing the percentage of the population that resides in these compared to the County as a whole, describe any housing set aside for special populations, talk about gaps in infrastructure, housing quality and supply, and services in these areas, and develop goals for deconcentrating these areas.

2. CMAP (Chicago): Page 19 to 21; Good use of visual tools such as regional maps and county maps.

3. Baltimore: Page 8-13: Good discussion with clear table and percentage comparisons.

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Strong Components
- Mapping out RCAP/ECAP locations in comparison to public housing and LIHTC investments
- Mapping out RCAP/ECAP locations in comparison to racial dispersion in region

Common Pitfalls to Avoid/Opportunities for Improvement

- In the absence of RCAPs/ECAPs, there should still be a discussion of demographics and identification of where concentrated poverty exists

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Data Prompt 5:
Concentrated Poverty: Provide an analysis of the conditions that allowed RCAPs/ECAPs to be created and to exist.

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Suggested Elements:
- *Discussion of which racial/ethnic groups are more concentrated in RCAPs/ECAPs and potential explanations*
- *Identification of jurisdictions contain more RCAPs/ECAPs and potential explanations*
- *Identification of factors that have helped to create these areas and trends in RCAPs/ECAPs that can be observed over time*
- *Identification of siting decisions (of affordable housing) that have contributed to these areas*
- *Identification of geographic or other barriers that limit deconcentration or reinvestment*

Suggested elements for Grantees without RCAPs/ECAPs:
- *Description of the concentrated population regarding:*
  - *nature and cause of their concentration,*
  - *reasons why the grantee has focused on the population,*
  - *level of participation in resource allocation processes and in income and assets,*
  - *trends in concentration and magnitude of the population,*
  - *relative availability of social services and community infrastructure.*

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Grantee Examples:

1. MAPC (Boston): Discusses how CDBG/LIHTC prioritizes funding of projects in areas with high poverty, but there is no discussion of the specific conditions that allow R/ECAPS to be created/exist, apart from the conditions that allow segregation on the whole to exist. <u>See p. 60</u> for a discussion factors that contribute to segregation.

2. CMAP (Chicago): <u>page 19</u> and <u>Chapter 4,</u> uses good secondary sources with reports and provides careful examination of historical and current legal documentations and practices; identifies problems of "ghetto" and limited mobility for minorities in the region with consideration of economic factors, such as unintentional public policies and regulations, implicitly biased private sector practices, and individual preferences.

Strong Components
- Connecting affordable housing siting decisions to resulting areas

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- Thorough explanation of factors, including economic, social, legal and political that contribute to concentrations by race or other elements in the instance of no R/ECAPs

<u>Common Pitfalls to Avoid/Opportunities for Improvement</u>

- Include discussion of additional conditions that have allowed RCAPS/ECAPS to exist.
- Avoid replacing discussion of RCAPS/ECAPS with discussion of segregation alone

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Data Prompt 6:

Concentrated Poverty. Provide an analysis of deficiencies within RCAPs/ECAPs and clear and specific action steps to increase opportunity within these areas.

Suggested Elements:
- *List each RCAP/ECAP (including location) and discuss gaps in infrastructure, housing quality and supply, and services for each area.*
- *Consider the following items for each RCAP/ECAP:*
  - *Housing quality*
  - *Deconcentration opportunities (demolition/vacant land)*
  - *Job access (especially low-wage/entry level)*
  - *Access to effective transportation*
  - *Bank/loan presence or absence*
  - *Availability of infrastructure, such as sidewalks, street lights, paved streets and public water*
  - *Commercial/retail access*
  - *Social services*
  - *Crime rate*
  - *Health care access*
  - *School quality*
  - *Recreation*
  - *Libraries.*
- *This discussion and analysis can group RCAPs/ECAPs that are located in similar typologies of place (such as urban/inner-city, rural, small town, inner-ring suburb, concentrated but near opportunity, area of cultural significance, etc.).*
- *Also list potential opportunities for deconcentration of housing units, opportunities for replacement housing through deconcentration, opportunities to stabilize remaining housing, and relationship of schools to RCAPs/ECAPs (current condition, capacity, and need for additional options/magnets, and anticipated population of school age children.)*
- *For each RCAP/ECAP area, develop goals to increase infrastructure access, deconcentrate housing, rehab and support remaining housing, improve access to services, increase mobility and transportation options, and identify potential partnerships to help achieve these goals. Within these goals there should be a set of priorities for more immediate attention, and if possible, how the RPSD can address them.*

Grantee Examples:

1. CMAP (Chicago): See page 13-15: Provides analysis and discussion of job centers, accessibility and housing options overlaying with RCAPs. Page 20-21 overlays RCAPs with transit mapping, poverty rate at local level and race compositions, and identify mismatch challenges.

- Discussions that address both de-concentration opportunities as well as increasing opportunity within RCAP/ECAP areas

Common Pitfalls to Avoid/Opportunities for Improvement

- Goals should be developed for each RCAP/ECAP area, not simply at the general, region-wide level, as well as establishing priorities for increasing opportunity within these areas and de-concentration opportunities.

Data Prompt 7:

Access to Opportunity: Define elements of opportunity, identify areas of opportunity, and describe whether certain indices of opportunity are more inequitably located across certain racial/ethnic groups.

Suggested Elements:
- *Include map of areas of high opportunity throughout region*
- *Discussion on how opportunity indices were weighted and who made that decision*
- *List of high opportunity areas and location (including jurisdiction)*
- *List elements of opportunity for each opportunity area (Including the following elements of opportunity: better than average schools, jobs (especially entry level), health care access, commercial/retail access, access to effective transportation, relatively low crime rate, availability of infrastructure, recreational areas, libraries)*
- *List additional elements that can enhance opportunity*
- *Description of disparities in racial/ethnic/income composition, in high opportunity versus lower opportunity neighborhoods and for each opportunity index including elements to enhance opportunity such as:*
  - *infrastructure improvements*
  - *increased access to transportation*
  - *school construction/magnets*
  - *planned jobs*
  - *crime issues*
  - *access to health care*
- *Analysis should be broken down by race/ethnicity and by lower-income race/ethnicity*
- *Maps that overlay density by race/ethnicity with opportunity neighborhoods.*

Grantee Examples:

1. MAPC (Boston): Elements defined on pp. 28-29. Strong discussion of how both the Kirwan and HUD provided opportunity indices were interpreted for this analysis. Opportunity areas identified on maps on pp. 48-49, but would be helpful to name these communities for the unfamiliar reader. Useful graphs and illustrations of opportunity indices and discussion of how certain indices are more inequitably located across certain racial/ethnic groups on pp. 30-32.

2. CMAP (Chicago): See pages 13-15 and 21-24: together with clear visual tools, provide sophisticated discussion on opportunity mismatch problems.

- Visual representations showing race/ethnicity in comparison to areas of opportunity
- Discussion of interpretation of opportunity indices
- Clear definition and explanation of "areas of opportunity"

Common Pitfalls to Avoid/Opportunities for Improvement

- Need to provide additional analysis and discussion where areas of concentrated poverty are also designated as areas of opportunity

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Data Prompt 8:

Access to Opportunity: Analyze the conditions that allow areas of opportunity to exist and any barriers to access these areas.

Suggested Elements:
- *List features that make areas of opportunity attractive for affordable housing or investment (such as foreclosure levels provide single or multi-family housing options, low land costs, planned mall development, plans to expand highway, bus lines, other transit)*
- *List high opportunity areas where affordable housing options are lacking and total number of subsidized units in high opportunity areas (may help to include map that overlays high opportunity areas with subsidized affordable housing)*
- *List types of affordable housing that are most suited to each opportunity area, and what elements of opportunity would need to be enhanced to make it more suitable for a particular type of housing*
- *Identify barriers to access to affordable housing in areas of high opportunity*

Grantee Examples:

1. MAPC (Boston): See pages 46-59 for discussion on affordable housing need and concentration by race/poverty; affordable housing options overlayed with opportunity areas; opportunities for mobility for Section 8 Housing Choice Vouchers; location of affordable housing and Educational Opportunity; exposure to environmental hazards and siting for housing for persons with disability.

2. CMAP (Chicago): See page 20: Overlays RCAP with transit, poverty rate mapping at local level; breakdowns the data by races to strengthen analysis; uses mapping to overlay RCAPs with transit data, minorities residents; discussion of HCV usage for opportunity areas and identifies programmatic barriers; provides bridge to action on HCV. See page 42: identifies Low Income Housing Tax Credit (LIHTC) areas mismatch with RCAPs and transits with effective visual cues on the maps. See page 54: identifies barriers to housing integration for disability population

Strong Components
- Discussion of affordable housing and how this relates to areas of opportunity

● Need to address barriers and suitable types of affordable housing for each respective opportunity area (or neighborhood typology, where appropriate)

Data Prompt 9:

Access to Opportunity: Establish clear and specific goals, priorities and action steps for increasing access to opportunity within each opportunity area.

Suggested Elements:

● *List goals for housing development, adding additional elements of opportunity, increasing access, and reducing barriers to opportunity for each opportunity area. Goals related to reducing barriers should also include responsible parties and time frames. There should be a set of priorities embedded in this list and justifications for those priorities.*
● *Describe school capacity in opportunity areas and how schools will connect to prioritized opportunity areas and be ready for new students.*
● *Describe where residents might come from to move to new housing options in high opportunity areas. Discuss how this meets real housing needs and connects to residents of RCAPs/ECAPs. Describe how outreach might work with potential new residents of these areas.*
● *List specific opportunities in integrated settings for people with disabilities (physical and mental-institutionalized and mental-non-institutionalized, homeless) and what current barriers for these populations are, and list goals to reduce barriers and increase access for people with disabilities.*
● *List location of units with more than two bedrooms near schools, public transportation, and near entry-level jobs.*

Grantee Examples:

1. MAPC (Boston): See pages 74-78; 85-91 and 95: Did not establish specific goals and priorities for each opportunity area, but did lay out broad and general strategies for how areas of opportunity could be more inclusive, including looking at CDBG, HOME and federal investment strategies, and re-aligning their LIHTC QAP to prioritize development in opportunity neighborhoods.

2. CMAP (Chicago): Chapter 7, provides recommendations on investing in disinvested communities, increasing transit oriented development, and investing in cargo oriented development.

Strong Components

● Discussion of strategy to align federal investments

Common Pitfalls to Avoid/Opportunities for Improvement

● Need additional specificity in action plans-- answer who, how, when questions.
● Should identify goals and priorities for each opportunity area/typology.

Data Prompt 10:

Fair Housing Infrastructure: Identify systemic issues of discrimination (pattern, practice or policy where the alleged discrimination has a broad, long-term impact on a group, industry or geographic area) and any actions taken/goals to address them.

Suggested Elements:

- *Highlighting of major successes to affirmatively further fair housing and other civil rights victories. Discuss AFFH efforts over the last five years.*
- *Discuss outstanding findings and status on these issues, actions that are being taken to correct issues,and resolution of these matters*
- *Identify number of individual cases in the region on fair housing discrimination (by protected class), bases of alleged discrimination, include discussion of trends of individual cases.*
- *Identify barriers to effective fair housing enforcement and education.*
- *Highlight any significant civil rights/fair housing related occurrences and acknowledge any fair housing findings and/or lawsuits by HUD or courts or other entities, including HUD sanctions or penalties, including Jim Crow, De Jure segregation, and NIMBYism.*
- *List existing or needed reasonable accommodation policies adopted by grantees; policies for waiting lists for accessible/handicapped units; describe accessible/handicapped units by # and % in PHAs, HCV landlords, multifamily; assessment of building codes for Fair Housing Act compliance; list goals to increase # of units to HUD standard or established need.*
    - *List racial/ethnic concentration by housing projects, disparities in maintenance, actions to overcome site segregation; identify racial/ethnic composition of public housing/section 8 voucher waiting lists; if gap is >5% then actions to reduce gap should be listed.*
    - *Describe proportion of the population that are Limited English Proficiency individuals and if significant (more than 1000, greater than 5%); describe barriers to accessing government services and housing for persons with LEP; describe existing policies/outreach for relevant LEP populations; describe ability to provide interpreters and written translations.*
- *Describe geographic areas not well-served by lenders/banks; identify racial/ethnic groups not well-served by lenders/banks; if disparities exist, list goals to address these disparities.*
- *List policies and practices that prevent discrimination against victims of domestic violence in housing provided by grantees; describe issues of potential discrimination against these victims; identify at least one goal to address this discrimination.*

Grantee Examples:

1. Kansas City: [See Section IV] Identified numbers, type, purpose of loan; denial rates by race; and subprime concentrations. Would be helpful to provide context for this data. Mapped the denials by race, and showed where denials were higher than community averages, but should discuss how these patterns came about. They also mapped concentrations of subprime loans, but without any other context. Should further discuss what these differentials mean for housing, opportunity, and equity in the region.

2. CMAP (Chicago): Chapter 6. Examines current entities' roles and performance. See page 38-40: Examination of public mechanisms including policies and regulations that contribute to segregation, such as zoning restrictions, overcrowding ordinances and crime free ordinances for rental housing, and Low Income Housing Tax Credits. See page 51: Discussion of discrimination towards persons with disabilities; See page

57, identifies discrimination based on family status. See page 45-47: discussion of private market practices and identifies "soft steering" in the real estate industry, mortgage and foreclosure practices and regulations; effective use of charts of mortgage types by races and secondary sources on mortgage discrimination which results in high foreclosure rate for minorities, contributing to the formation of RCAPS, high vacancy rate, high property tax and high rental rate. See page 58 - 65 discusses current fair housing entities and investigates discrimination and enforcement in housing; recent legal cases are provided. See page 68 - 73, provides recommendations on assessing zoning and code enforcement, training and licensing housing providers and professionals and other inclusive fair housing community building mechanisms.

<u>Strong Components</u>
- Discussion of previous analyses of impediments, the steps taken to successfully address previous findings, and any outstanding issues
- Identify any patterns in discrimination complaints- i.e. whether complaints originate from specific communities within the region

<u>Common Pitfalls to Avoid/Opportunities for Improvement</u>

- Be sure to provide context for data discussion
- When describing policies, be sure to consider their implications as well

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Data Prompt 11:
Physical Infrastructure: Describe major public investments (e.g. transportation, economic development) slated for the region and how these investments will impact low-income communities, communities of color and areas of high opportunity.

Suggested Elements:

- *Describe current disparities in access to water or sewer infrastructure for low-income communities, communities of color, with attention to RCAP/ECAPs; include analysis of why disparities exist, with consideration to current finance mechanisms, annexation policies, and political representation.*
- *Discuss how future water and sewer infrastructure investments will help to reduce these disparities (or make them worse). List goals and responsible parties to address barriers and include some priorities that translate into RPSD.*
- *Discuss how public investments in large infrastructure projects, tax breaks/direct subsidies to firms, redevelopment projects, other types of public infrastructure or economic development projects serve low-income communities and communities of color.*
- *Include an analysis of how public finance mechanisms to build or maintain infrastructure might contribute to disparities in access to infrastructure or improve them.*
- *Describe current impediments to transportation access and affordability for low-income communities, communities of color, especially RCAPs/ECAPs and households without access to a vehicle. Impediments could be measured by considering with consideration to commute times, average wait times for transit, walking distance to transit stops, transportation costs as a percentage of total income, average number of connections or connection times for commuters, availability of bicycle/pedestrian infrastructure, or safety*

Grantee Examples:

1. Kansas City : The RAI talks about transportation but in a limited fashion. Outlines some transportation goals for elderly, disabled, and low income people, included in the 2040 Transportation plan.

<u>Strong Components</u>
● Describe multiple areas of public investment described in the suggested elements
● Describing impacts on diversifying/integrating communities

<u>Common Pitfalls to Avoid/Opportunities for Improvement</u>

● Discussion should reflect community input on investment and public impact
● Be sure to discuss rationale for expected outcomes from proposed projects, as well as how they impact communities of color, low-income communities, and areas of opportunity

<u>Deliberation and Community Engagement</u>

Deliberation Prompt 1:
Proof of discussion of FHEA contents and findings with Consortium and/or regional stakeholders and Certification of this engagement.

Suggested Elements:
● *Formation of FHEA working group; at a minimum FHEA coordinator consults with existing working groups that focus on housing, equity, or access to opportunity to shape analysis and process*
● *List of representation of organizations that represent low-income communities and communities of color on group, with at least two included, although majority preferred*
● *Description of types of involvement of working group, how often they met, feedback provided, how feedback was integrated into process, integration of working group with rest of consortium*
● *Inclusion of multiple public comments periods on FHEA drafts throughout process;*
● *With minimum of one public comment period before consortium formally adopts FHEA.*
● *Description of comments received in public comment period and other community events, and how the*

FHEA addresses these concerns, or if it does not, inclusion of an explanation why.
- *Discussion of targeted engagement with traditionally marginalized communities (what types of engagement (surveys, focus groups, interviews, meetings, etc.), how often, number of participants.*
- *Description of comments and issues raised by traditionally marginalized communities, how these comments are addressed by the FHEA, and if they aren't, a discussion of why not.*
- *Discussion of deliberation participants and sessions, with focus on multi-sector multi-issue collaboration (including equity and civil rights groups).*
- *Discussion of deliberations around access to opportunity and reduction of segregation, investment in RCAPs/ECAPs, with regional and local actors involved. Include discussion about how opportunity and fair housing were defined and/or framed.*
- *Discussion of key issues that arose in deliberations, how FHEA addresses them, and what impediments exist to more productive discussion about access to opportunity, fair housing, and equity. Should include particular comments made or themes raised in deliberations by civil rights, fair housing, and equity organizations; and, how this differed from previous discussions on similar topics.*
- *Inclusion of discussion questions, discussion methods, and facilitators used.*
- *Presentation of FHEA findings to GTR for approval with at least one representative from civil rights, fair housing, or equity-focused organization.*

Grantee Examples:

1. Baltimore: page 65 - 67, examines current performance from Fair Housing intergovernmental coordination and Fair Housing advocacy NGOs.

2. CMAP (Chicago): Discussion of private sector engagement (page 45-46), intergovernmental coordination (Page 59-60) and Fair housing advocacy NGOs (page 60-61); local fair housing agency (page 26), municipalities survey (page 42-44) and identify "red flags" and major barriers for implementation as well as benefits of fair housing for these shareholders.

<div align="center">Strong Components</div>

- Lessons learned document from stakeholders from low-income communities
- Clearly documented deliberation and community engagement process including who was engaged, how, and what came from this engagement

<div align="center">Common Pitfalls to Avoid/Opportunities for Improvement</div>

- This standard does not require its own section; evidence of public engagement should be reflected throughout the report.
- FHEA should reflect how community groups' issues were addressed

<u>Decision-Making and FHEA Bridge</u>

Decision-Making Prompt 1:
Bridge: Clear discussion of how the FHEA findings will inform decision-making, prioritization and investment.

Suggested Elements:

- *Demonstrated inclusion of action steps into RPSD and/or implementation projects.*
- *Clear demonstration of ways that FHEA informed key decisions and investments in RPSD or implementation projects – list elements of plan or projects that will have FHEA influence*
- *Discussion of other non-OSHC grant related processes and products that will be informed by FHEA process; identification of future home/backbone for FHEA*
- *List the decision-makers who approved the FHEA and discuss the decision-making process with them, any issues that arose, and how they were addressed.*
- *Clear and specific action steps with responsible parties identified to make progress on impediments for RCAP/ECAPs section and Access to Opportunity section in particular. Action steps may be regional or local – ideally similar action steps for local jurisdictions might be grouped.*

Grantee Examples:

1. MAPC (Boston)- See pp. 109-116 for recommendations. They largely address the impediments raised throughout the analysis including an approach for how to address de-concentrating racialized areas of poverty as well as promoting access to areas of opportunity, but it is not clear how the recommendations will be carried out or by whom.

2. Thurston County (WA) - (pg 57-59) Summary of actions that should be taken to further fair housing and increase access to opportunity. Would be stronger if they included responsible parties for addressing actions, prioritized actions, identified funding sources, and show how it fits into regional plan.

<u>Strong Components</u>

- Provide action-oriented, detailed and feasible recommendations
- Clear indication of how the FHEA will inform the RPSD

<u>Common Pitfalls to Avoid/Opportunities for Improvement</u>

- Need to clearly identify responsible parties and priorities among the list of recommendations