Review Submission

Review the content of your AFH before completing the certification and submission to HUD.

Presubmission Review

Please note that this software does not determine if the answers provided are substantially incomplete or inconsistent with fair housing or civil rights requirements.

The assessment may be submitted for HUD review.

Introduction

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I. Cover Sheet

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Sole or Lead Submitter

Contact Information

| Name | Nels Bohn |
Program Participants

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AFFHT Data Version

Instructions

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II. Executive Summary
II.1. Summarize the fair housing issues, significant contributing factors, and goals. Also include an overview of the process and analysis used to reach the goals.

Instructions

Overview: The Assessment of Fair Housing (AFH), which replaces the Analysis of Impediments to Fair Housing (AI), is a process mandated by the U.S. Department of Housing and Urban Development (HUD) to be undertaken by communities receiving federal housing and community development dollars. Due to the submission cycle for its Consolidated Plan, Ithaca will be one of the first 125 communities nationwide to submit an AFH.

Background: Federal fair housing law prohibits discrimination based on race, color, religion, national origin, sex, disability or familial status. HUD recognized that fair housing barriers persist nationally and sought to more fully incorporate fair housing analysis into the planning process by establishing the AFH. The intent is to help communities determine whether policies, practices, programs, and activities restrict fair housing choice and access to opportunity. Goals developed through the AFH will be incorporated into the community's Consolidated Plan and subsequent Action Plans.

Process: In addition to the community engagement described below, IURA staff reviewed the comprehensive Analysis of Impediments to Fair Housing (AI) prepared for the City in 2015 and myriad other reports and materials that have bearing on fair housing.

Community Engagement consisted of:

- Public Information Sessions
- Focus Groups
- Consultations with Local Leaders, Content Experts, and Service Providers
- Individual Interviews with Residents
- Public Hearings
- Stakeholder Consultations and Advisory Group

Fair Housing Issues: HUD has established the following fair housing issue-areas to be analyzed at jurisdictional and regional level by every community receiving entitlement funding.

- Segregation/Integration
- Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs)
- Disparities in Access to Opportunity
- Publically Supported Housing Location and Occupancy
- Disability and Access
- Fair Housing Enforcement, Outreach Capacity, and Resources
**Contributing Factors:** For each Fair Housing Issue-area, the entitlement community must identify the Contributing Factors which "create, contribute to, perpetuate, or increase the severity of one or more fair housing issues." There may be many, overlapping Contributing Factors that underlie fair housing issues. HUD directs communities to identify all Contributing Factors that pertain, even if it is outside the ability of the program participant (in this case, the City of Ithaca) to control or influence it. After the Contributing Factors are identified, they must be prioritized. Identification and prioritization of Contributing Factors informs goal setting in the AFH.

**Prioritization of Contributing Factors: Methodology and Justification**

Up to five (5) Contributing Factors were prioritized for each fair housing issue, based on the following criteria:

- Frequency of association with fair housing issues, or, broad impact across multiple issues
- Significant impact in a single area
- Public input received via the community participation process
- Impact (limitation or denial) on fair housing choice
- Impact (limitation or denial) on access to opportunity
- Negative impact on fair housing or civil rights compliance

**Contributing Factors identified for this AFH include:**

- Source of Income discrimination
- Lack of clear and effective fair housing enforcement authority
- Lack of local public fair housing enforcement
- Lack of state or local fair housing laws
- Lack of resources for fair housing agencies and organizations
- Displacement of residents due to economic pressure
- Displacement and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
- Lack of meaningful language access
- Impediments to mobility
- Insufficient on-campus housing at Cornell University, in combination with growing enrollment, resulting in students outbidding non-student households for off-campus housing
- Location and type of affordable housing
- Lack of access to opportunity due to high housing costs
- Availability of affordable units in a range of sizes
- Lack of affordable in-home or community-based supportive services

*See Appendix: "Prioritization of Contributing Factors" for further detail.*

**Summary of Goals to Affirmatively Further Fair Housing:**
1. Prohibit discrimination on the basis of source of income, by establishing local (jurisdiction and region) law(s) establishing protection, authorizing enforcement entity, and creating meaningful protocol.

2. Increase supply and access to affordable housing options, particularly at extremely low, very low, and low-income levels, especially in high opportunity neighborhoods.

3. Establish clear local authority and meaningful mechanisms for enforcement of fair housing law.

4. Prevent displacement in neighborhoods where there is either an established trendline of displacement or imminent threat of displacement (i.e. adjacent high-value neighborhoods with few for-sale homes). Explore Small Area Fair Market Rents, mini-repair for low-income homeowners, and expansion of the Community Housing Land Trust for owner-occupied homes.

5. Address the need for a Language Assistance Plan (LAP) for Limited English Proficient (LEP) individuals.

6. Address policies and practices that result in displacement, eviction of, and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking.

7. Create an Affirmatively Furthering Fair Housing-directed goal within the 2018-2023 Consolidated Plan.

See Appendix: "Goal Summary" for further detail.

Note: This AFH utilizes data from data version AFFHT0003 (7/20/17) as earlier data versions omit approximately 9,000 persons from the jurisdiction. The tool defaults to data version 0002 and does not allow the jurisdiction to select version 0003.

III. Community Participation Process

Instructions

III.1. Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board and other resident outreach.
Focus Groups and Community Engagement: The Ithaca Urban Renewal Agency partnered with stakeholder groups in the community to offer four focus groups at different sites around town, in order to reach Ithaca residents either in their own neighborhoods or at a place with which they have familiarity or an existing relationship.

- The first of these was held at the Spencer Road Neighborhood Block Party on Sunday, August 13, 2017 from approximately noon to 5:00 pm.
- The second was a lunchtime event on Wednesday, September 20, 2017 at Greater Ithaca Activities Center (GIAC) with the GIAC Senior Citizen group.
- The third was also on Wednesday, September 20, 2017 at the monthly resident meeting/dinner at Magnolia House, a supportive housing site for women in recovery and their children operated by local PHA, Tompkins Community Action (TCA).
- The fourth was a dinnertime event on September 27, 2017 at the Learning Web's Youth Outreach Center, which assists youth aged 16-24, many who have experienced homelessness, in accessing housing, education, and employment.

Individual Interviews: IURA staff conducted individual qualitative interviews with individuals at various sites around town. Individuals were contacted via the public engagement process, and were either approached by the IURA staff or requested the interview themselves. One individual contacted the IURA requesting accommodation in order to participate in a Public Information Session and was interviewed by phone. Examples of sites include: The Ithaca Commons, area bus stops, sites of community festivals, and a neighborhood business.

Public Hearings: Two public hearings were scheduled during the Planning and Economic Development Committee of Ithaca Common Council to obtain the views of residents.

- The first public hearing was held on Wednesday, September 13, 2017 at 6:00 pm.
- The second public hearing was Wednesday, October 11, 2017 at 6:00 pm.

Both were advertised with legal notices in the *Ithaca Journal*. As is practice for the City's public meetings, the Planning and Economic Development Committee’s agenda was also posted in advance to the City of Ithaca’s website, for review by interested parties.

Public Information Sessions: Two Public Information Sessions were held to acquaint residents and other interested parties with the assessment process and offer assistance with navigating AFFH maps. These information sessions were advertised on the Tompkins County Human Services Coalition email list serve, which reaches over 3,000 subscribers including nonprofit agencies across the county serving LMI individuals, as well as community, volunteer, grassroots organizing, and affinity groups of all kinds. The second of the two Information Sessions was also publicized on the City of Ithaca’s Facebook page.

- The first Public Information Session was held on a Tuesday evening, August 29, 2017 at 6:00 pm at City Hall.
- The second Public Information Session was held on a Saturday morning, September 9, 2017 at 10:30 am at Tompkins County Public Library.
Stakeholder Consultations and Advisory Group: Leaders or designated staff members from a wide-range of nonprofit or community agencies serving residents in Ithaca and Tompkins County were interviewed to gain input on fair housing needs for the populations they serve, including: Domestic violence and sexual assault; transitional housing; supportive housing; reentry services; disability rights and advocacy; legal services; human rights; transportation services; planning and environmental justice; immigrant and refugee services; homeless services; services for people in recovery; neighborhood association(s); services for youth and seniors. Leaders of three agencies providing services to LMI individuals agreed to be available to provide advice and guidance during the AFH community engagement process.

III.2. Provide a list of organizations consulted during the community participation process.

Instructions

Advocacy Center
Catholic Charities of Tompkins/Tioga Immigrant Services
Catholic Charities of Tompkins/Tioga Samaritan Center
Central New York Fair Housing (CNYFH)
City of Ithaca Disability Advisory Council (DAC)
City of Ithaca Engineering Division
City of Ithaca Human Resources Department
City of Ithaca Sidewalk Program
Greater Ithaca Activities Center (GIAC) Seniors
Finger Lakes Independence Center
Ithaca CarShare
Law-NY
Learning Web Youth
Learning Web Youth Outreach Staff
III.3. Describe whether the outreach activities elicited broad community participation during the development of the AFH. If there was low participation, or low participation among particular protected class groups, what additional steps might improve or increase community participation in the future, including overall participation or among specific protected class groups?

Community participation, while broader than some past projects, could be enhanced to involve more people in protected classes. Below are recommendations based on this year's AFH process.

**Timeline and Scheduling:** This AFH was conducted under a compressed timeline of less than 6 months. The AFH Process Mapping guide recommends 6-12 months for completion of the process. Next time, begin consultation with community leaders up to 12 months in advance to connect more fully within busy networks. Be aware that the Ithaca environment is heavily influenced by the academic calendar; stakeholders commented that the summer months pose difficulty for consultation or participation in the advisory process, due to reduced staffing and vacation schedules.

**Public Information Sessions:** Mixed results. Both were held in summer. The weeknight session was well-attended; the Saturday morning session had a very small group. Continue with weekday evening sessions, especially if outreach is conducted in late spring, summer, or early fall. Weekend meetings may be advantageous during winter months when limited light and weather conditions make traveling in the evening difficult.
Focus groups: Focus groups hosted in collaboration with partners were well-attended and helped to reach people likely to be in protected classes. Partnering with a greater number of agencies or community groups in the future would build on this early success and reach more residents in protected classes. Reaching out to faith communities and community groups of immigrants could increase people with religious identities (religion), people born outside the U.S. (national origin), and also with families (familial status). Be aware that in this academic community, it is not unusual for agencies to be approached by researchers with similar requests for focus groups, so agencies may exercise discretion in scheduling to avoid over-burdening agency clients/participants.

Publicity and Community Engagement: Ithaca has a limited array of traditional media outlets reaching protected groups. Utilizing the Human Services Coalition List Serve was an effective means of publicizing events and should continue. At the very start of the process next time, obtain time on the agendas of regular meetings of community groups serving protected classes and request linkage or promotion on social media. Some stakeholders cautioned that their constituents were not necessarily well-served by online platforms (i.e. older adults) or lacked regular access to technology (i.e. limited smart phone data plans), so request word of mouth promotion by community leaders and service providers to their constituents (including social media links). Table at more community festivals. Consider training a volunteer team to raise awareness within the community about the AFH and its importance and assist with outreach, focus groups, and other community-facing tasks like posting to social media networks could result in higher participation.

III.4. Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.

Instructions

Source of Income Discrimination

- Inability to live in neighborhood of choice as a Housing Choice Voucher holder (HCV); voucher holders can rent only where a landlord is willing to accept voucher.
- Waiting list for Section 8 is exceedingly long; families and persons with disabilities are prioritized, others are not; people can wait for years to receive Section 8.
- No local, state or federal protection against discrimination based on source of income (i.e. Housing Choice Vouchers, County Department of Social Services housing benefit, or other subsidy).
- Many people lose vouchers because they cannot find landlords who will accept them.
- Homeless due to inability to find landlord willing to accept HCV.
- Concerns about safety, crime, drugs, and condition of units at multifamily housing complex that accepts HCV, but little other choice.
- Concerns about safety, crime, drugs, condition, cleanliness, and habitability at units referred to by Department of Social Services, but there is an implied or real requirement to accept the inappropriate referral or lose housing assistance.
Landlords have (mis-)perceptions of people who have HCV; may prejudge voucher-holders (especially if they have never rented to a voucher holder).

Housing Choice Voucher holders have to be proactive in meeting landlord, showing who you are and why you would be great tenant, before landlord sees application with HCV. This helps in changing landlord perception.

**Enforcement Issues**

- Enforcement agencies are prohibitively far away (50 and 150 miles) to reasonably access.
- Economic disincentives to pursuit of fair housing claim; claimants would need to take time off work and/or possibly locate transportation and pay transportation costs.
- Urgency of need to obtain housing diminishes pursuit of fair housing complaint; need for housing supersedes engaging in discrimination claim; tenants do not have the energy/time/resources to locate housing while following up on unfair practices and once in housing, people are focused on other life-sustaining activities.
- Lack of accountability for unfair practices on the part of landlords.
- Lack of clarity between regulatory agencies (i.e. PHA and HUD). Tenants are referred by each agency to the other but cannot get issues resolved ("passing the buck").
- People do not speak up when discrimination is suspected for myriad reasons: fear of retaliation, fear of loss of housing, fear that other housing with similar amenities (such as transit access, proximity to child's school) will not be identified.
- HUD takes a long time to process complaints file (i.e. currently over a year).
- Proper enforcement includes rewards and punishments.
- Need to ensure realtors are receiving proper Fair Housing training/certification.

**Education Needed**

- People need to know what their Fair Housing Rights are.
- Tenants and landlords need education/training/workshop on effective communication strategies for dealing with issues in housing.
- People's lack of understanding or misconceptions of fair housing law can result in not getting appropriate help until they are at a crisis point (i.e. have been served notice by landlord); then it may be too late because, for example, they did not pay rent thinking that they were protected.
- Tenants don't automatically know how to be a good tenant (i.e. what landlords expect, what neighbors expect, what responsibilities a tenant should take on, etc.).
- A Tenant Educator-type role could help younger tenants/those with limited rental histories in the following ways: 1) Understanding their rights; 2) Understanding what landlords can reasonably expect from tenants; 3) Demonstrating effective practices for communication with landlords.

**Tenant Organization**

- Need for organization to exist to help tenants (educate, advocate, mediate with landlords, etc.).
- Solution could be a monthly meeting (available to renters) where a local representative helps with reporting of landlord/tenant and/or fair housing issues.
A tenant organization could help tenants harness their collective power.
Tenant organization could help with information collection and delivery.
Renter's Union needed.
Renter's organization would not be helpful if associated with only advocating for tenants. Landlords need to trust it, too.
Need for resources such as those which exist in other places, such as Tenant Protection Hotline and Tenant Harassment Prevention Task Force.

**Housing Market/Unaffordability**

- Landlords prefer to rent to students because they can obtain higher rents from students.
- High demand market may "mask" unlawful discrimination; landlord may exercise preferential renting when there are many candidates.
- Lack of action on the part of landlords to make requested accommodations or repairs in a timely manner, whether for all tenants or tenants of protected class.
- High housing cost burdens; rents outstrip incomes.
- Student population dominates rental market; need to build more on-campus housing to release pressure on local residents' lack of access to housing.
- City needs to work with Cornell to get more help from Cornell in building more housing.
- Paying for heat becomes an affordability issue when coupled with rent.
- "Prices are Proxy" for discrimination.

**Incentives**

- Provide incentives for landlords to accept Section 8 (HCV).
- Don't provide incentives for landlords to accept Section 8.
- Provide incentives to landlords to integrate universal design/low barrier design/accessibility modifications for disabled in rental housing.

**Rental History and Credit Barriers**

- Landlords require proof of rental history/referrals that are not attainable by immigrants/refugees.
- Landlords require proof of rental history/referrals that people who have never rented before, such as youth, do not have.
- Landlords may "flag" a tenant considered troublesome for any reason (including discriminatory reasons, such as disability) to another landlord in the referral.
- Landlords require rental history/referrals that are not attainable by/effectively excludes people who have experienced homelessness, incarceration, recovery from drug abuse, medical conditions.

**Fear of Losing Housing/Eviction/Retaliation**

- Nuisance ordinances in municipalities may have the effect of suppressing tenant calls to law enforcement to report crimes occurring in or near their housing, for fear of loss of housing.
• Nuisance clauses in leases may have the effect of suppressing tenant calls to law enforcement to request help for domestic violence, for fear of loss of housing.
• People fear advocating for themselves, whether for fair housing or for simple landlord/tenant issues like repairs. The fear is that asserting rights will result in retaliation, eviction, or non-renewal of lease.

Suspected Unlawful Discrimination

• Suspected discrimination based on familial status; issues included age of male children, race of family or race of children; suspected landlord preferences for smaller families or non-family renters (i.e. landlords stressing desire for "quiet" tenants).
• Non-compliance with ADA requirements (i.e. reasonable accommodation).
• Suspected discrimination based on disability: Disability is not visually apparent; landlord does not perceive tenant as having a disability and thus does not regard requested accommodations as necessary; persons with invisible disabilities are viewed as disruptive or troublesome rather than having a disabling health condition which leads to conflict with landlords and could precipitate non-renewal or eviction.
• Sexual harassment by landlord.
• False information provided by landlord or property manager: No availability when person of color inquired; availability within same time frame when white person inquired.

Information Gaps

• Lack of rental association or information-providing entity specifically for renters.
• Lack of knowledge/awareness of fair housing rights (tenants and landlords both).
• Lack of information about where to go with concerns about fair housing.
• Information asymmetry -- tenants don’t know whether their prospective landlord is reputable; no publically available ranking system; need for app on which landlords could be rated by tenants.
• Landlords and tenants who are unfamiliar with each other’s culture are likely to have communication problems. See Cultural Competency note below under "Miscellaneous."

Publically Supported Housing/Affordable Housing

• Need for more publically supported affordable housing at all income levels, especially at low- and very low-income levels.
• Concerns about application process for obtaining housing within affordable housing developments.
• Concerns about affordable housing provider's non-renewal or eviction process.
• Need to examine "affordability"-- who are supposedly affordable units affordable to? A $900 for a single or one-bedroom is not affordable to someone receiving a $354/month housing benefit from County Department of Social Services.
• Need for truly habitable housing that matches the amount that Department of Social Services provides ($354).
• Rent increases by affordable housing providers; fear of loss of housing due to income qualification; fear of increased housing burden.
• Needs to be transit accessible; bus routes need to change to accommodate new multifamily affordable housing development(s).
• Affordable housing needs to have access to green space.
Environmental Justice

- Concerns affordable housing is/will be sited near areas of environmental hazard.
- Concerns that environmental hazard have not been adequately abated prior to building of affordable housing.
- Questions regarding siting of housing, affordable or otherwise, on floodplain and notification of that fact to renters.

Transportation

- Housing needs to be planned around transportation options.
- Cheaper housing is in rural areas where there are no transit options so no access to jobs, education, services, and other places.

Legal Representation

- Pro bono attorneys could mediate in disputes between landlords and tenants.
- Pro bono attorneys are needed to represent people facing fair housing issues, eviction, or other problems in housing.
- Partnering with Cornell Law School was raised as a recommendation.

Miscellaneous

- **Premature Second Year Leases:** Especially in student market, landlords pressure for renewal of lease for a second year, only a few weeks or month after move-in. This has two negative effects: 1) It ties up the housing market (it effectively takes the apartment off the market for two years; others don't have a chance to see it). 2) Puts new tenant at immediate disadvantage: The tenant could end up not liking the place but already be locked into a lease for another year.
- **Lack of Cultural Competency** between landlords and tenants causes landlords to lose potentially good tenants. Need for improved communication/understanding/"translation" between the two groups.
- **Mental Health Liaison/Intermediary** that landlords could call when trying to work with tenant who seems to have a mental health challenge to help the tenant achieve the action the landlord is requesting and thereby preserve housing/prevent eviction. (Such a resource could also be accessed by the tenant.)
- **Resources Used to Exist** in the community for helping with some of the communication-type issues with landlords and tenants in the community (Examples: Rental Housing person within the City's Building Department; Department of Social Services). These resources were eliminated due to lack of funding or other issues took priority.

Myriad Landlord/Tenant Concerns, Questions, and Issues arose during community discussion.

All comments were accepted.
IV. Assessment of Past Goals, Actions and Strategies

IV.1. Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:

IV.1.a. Discuss what progress has been made toward the achievement of fair housing goals.

Instructions

The City of Ithaca developed Analysis of Impediments to Fair Housing Choice in May 2015 and adopted a Fair Housing Action Plan in October 2015 that identified the following priority impediments to address:

1. Disabilities - People with disabilities report higher levels of discrimination and lower levels of housing accommodation than other residents.
2. LEP - The needs of Limited English Proficient (LEP) individuals may be underserved by the City of Ithaca and by its sub-recipients of federal funding.
3. Source of Income - Exclusionary tactics against households who rely on public and private subsidies for housing is prevalent in the city and has a disparate impact on protected classes in Ithaca.
4. Fair Housing Enforcement - The City of Ithaca does not provide its residents with any effective legal mechanism by which their fair housing rights are meaningfully enforced.
5. Homeless Housing - There is an inadequate supply of emergency shelter and transitional housing services especially for homeless families with children and persons with disabilities.
6. Lack of Affordable Housing - The City's high rental and homeownership prices, as well as limited land and public resources, have a disparate impact on Ithaca residents in protected classes who have low incomes by limiting their housing options.

Progress
Disabilities: The City prepared fair housing information pamphlet that is mailed to each landlord with their notice for inspection to renew their Certificate of Compliance. The brochure specifies landlord responsibilities under Fair Housing law to make reasonable accommodations to persons with disabilities, including allowing service animals.

LEP: The City staff has prepared a draft LEP-LAP Plan, which is undergoing advisory review by the Tompkins County Office of Human Rights. In addition, all City senior staff participated in a training on language assistance from the TC Office of Human Rights.

Source of Income: Attended Rental Housing Advisory Commission to discuss HCV issues. City staff requested meeting Landlord Association, but did not receive call backs. Landlords at the RHAC meeting identified the following issues that discourage landlords from renting to HCV households:

- Payment standard is too low compared to market rent
- 12-month minimum lease term is problematic if unit is rented off-cycle with the academic year in a college community
- Lack of sufficient security deposit resources available to landlord to address damages at move-out (DSS security deposit letter is often inadequate)
- Administrative requirements can be burdensome
- The City is exploring zip code based HCV payment standards

The City is exploring zip code-based HCV payment standards; however 60% of the County population is located in a single zip code (14850).

Fair Housing Enforcement: The Tompkins County Office of Human Rights (OHR) developed a draft new anti-discrimination ordinance that includes designation of OHR as the lead organization to enforce fair housing. No action has been taken by the County Legislature on the proposed ordinance to date.

Homeless Housing: The 2016 and 2017 Action Plans included funding for the "Housing for School Success TBRA" program and "A Place to Stay" project, which both assist homeless families and women secure stable housing and wrap around services.

Lack of Affordable Housing - The City prioritizes funding in the Action Plan for projects that increase the supply of affordable housing. The City continues to annually contribute funds to the local Housing Trust Fund, that are matched by Tompkins County and Cornell University, to support development of new affordable housing.

IV.1.b. Discuss how successful in achieving past goals, and/or how it has fallen short of achieving those goals (including potentially harmful unintended consequences).
The City has made strong progress on addressing impediments to fair housing in the past 24 months since adoption of the Fair Housing Action Plan. Source of income discrimination, fair housing enforcement, and lack of affordable housing remain priority fair housing issues.

The City contracts with the Ithaca Urban Renewal Agency (IURA) to administer CDBG and HOME funds awarded to the City. Annual HUD funding to the City has decreased significantly since 2004 when the City became an Entitlement City and continues to decline. In 2017, the City is allocated a total of $919,000 in CDBG and HOME funds, down from $1.58 million in 2004, an approximately 50% decrease in real dollars. Reduced HUD funding constrains the City's ability to focus resources on action steps to address fair housing impediments.

IV.1.c. Discuss any additional policies, actions, or steps that the program participant could take to achieve past goals, or mitigate the problems it has experienced.

Instructions

The lack of housing affordability in our jurisdiction will likely continue to be a major issue for the foreseeable future. Continuing to take action to increase the supply of affordable housing and to promote access to opportunity is necessary.

The City continues to collaborate with Cornell University and Tompkins County to annually contribute matching funds to the Community Housing Development Fund to assist construction projects that create affordable housing located in areas with strong transit linkages and proximity to employment centers. Since 2009, over 200 units of affordable housing have been assisted.

IURA staff drafted a mandatory inclusionary zoning ordinance targeting creation of units available to a household earning 50% of AMI. Policy maker reception to the proposed ordinance was mixed with concerns expressed that such an ordinance may reduce the overall supply of new housing units built in the City and lead housing developers to target suburban locations outside the five square mile city limits. In addition, recent new housing in the City has consisted primarily of premium-priced apartments and LIHTC affordable housing units, but little housing targeted at middle income and workforce households. An ordinance that targets creation of very low income housing units was thought to hinder construction of middle income housing projects that may have difficulty internally subsidizing inclusion of 20% very-low income housing units.

In response to the above concerns, the IURA staff developed a voluntary incentive zoning ordinance to induce affordable housing that granted a density bonus, elimination of parking requirements, and exemption from site plan review for projects that are determined by staff to have complied with Design Standards. The benefits were eligible to projects that include 15% of units at 60% AMI or 10% of units at 50% AMI. Planning Board members expressed strong opposition to curtailing their discretion during site plan approval process, the very incentive that developers identified as the most attractive to induce inclusion of affordable housing.

Staff is considering revised voluntary incentives to encourage development of affordable housing. In addition, staff is documenting single family house sales, rental housing costs and neighborhood composition trends, which appear to support concerns about gentrification of many City neighborhoods leading to reduced racial, ethnic and economic diversity in such neighborhoods. The rate of increase in housing
costs continues to far outstrip the increase in family or household incomes.

IV.1.d. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.

The City is still implementing recommended actions to address impediments identified in the 5-year 2015 Assessment of Impediments, and has incorporated priority unfinished actions into goals in the 2017 AFH. For instance, adoption of a Language Assistance Program to address impediments to LEPs has progressed, but not been adopted yet, so it is included as a 2017 AFH goal. In other cases, new information made available through development of the AFH has elevated issues identified in the 2015 AI into a top priority goal in the AFH, such as prohibiting the source of income discrimination.

Effort is made to maintain a reasonable number of AFH goals that can be advanced by a small professional staff as all HUD Entitlement administrative funding awarded to the City totals only $165,000 in 2017 and continues to dwindle on a yearly basis.

V. Fair Housing Analysis

V. Fair Housing Analysis > A. Demographic Summary

V.A.1. Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).

1 Instructions

1 Relevant Data

The City of Ithaca, home to Cornell University, has a population of approximately 30,000 persons of which 57% are students enrolled in higher education. Cornell University and Ithaca College are located in, or adjacent to, Ithaca. City demographics are greatly influenced by Cornell students. Cornell enrollment in 2016 was approximately 22,000 students. The following table summarizes race and ethnicity for the City, Cornell University and the Tompkins County (region).
Racial/Ethnicity - City - Cornell - Region

<table>
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<th>Region</th>
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<tr>
<td>White</td>
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<td>37%</td>
<td>80%</td>
</tr>
<tr>
<td>Black</td>
<td>6%</td>
<td>5%</td>
<td>4%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>6%</td>
<td>10%</td>
<td>4%</td>
</tr>
<tr>
<td>Asian</td>
<td>16%</td>
<td>15%</td>
<td>9%</td>
</tr>
<tr>
<td>Native American</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>Multiple Races</td>
<td>3%</td>
<td>4%</td>
<td>2%</td>
</tr>
<tr>
<td>International</td>
<td>0%</td>
<td>22%</td>
<td>0%</td>
</tr>
</tbody>
</table>

The Cornell student body is more racially and ethnically diverse than the City or region, even before considering 4,100 international students. The City is more racially and ethnically diverse than the Region. Asians make up the largest racial/ethnic minority at 16% in the City and 9% in the region. Both Black and Hispanic groups make up 6% of the City and 4% of the County population.

Since 1990, the City and Region have become more diverse. The White, Non-Hispanic population in the City declined from 79% in 1990 to 68% currently. Asian and Hispanic populations increased by 50% during this time period in the City up to 16% and 6%, respectively. The current Black, Non-Hispanic population level remains at its 1990 rate of 6% after peaking at 7% in 2010.

At Cornell, the White, Non-Hispanic population dropped by 20% points since 2002 to 37% of the student body in 2016. Corresponding increases in Hispanic (1,270), Multi-Race (779), Asian (533) and Black (289) categories were experienced during this period as Cornell transitioned from predominantly White, Non-Hispanic to a majority minority enrollment.

Racial/Ethnic trends in the Region from 1990 follow the trends in the City, though at a reduced rate of change. The White, Non-Hispanic population reduced from 89% in 1990 to 80% currently. The Hispanic population doubled to 4% of the region, while the Asian population increased from 5% in 1990 to 8% currently. The Black population increased from 3% to 4% currently, after peaking at 5% in 2010.

In 2016, Cornell provided 9,250 on-campus/university affiliated beds, resulting in approximately 12,750 students being housed off-campus, according to materials developed by Cornell University for the Cornell Housing Master Plan. In addition, approximately 1,600 Ithaca College students live off-campus. Student households, with a rental time horizon of one to three years, are typically able to outbid non-student households for rental units located in close proximity to campus. A typical monthly rent in the Collegetown neighborhood is $1,000/bed for multi-bedroom apartments.

In large part due to the presence of Cornell University, the City and Region have a high percentage of Foreign-born residents. Foreign-born residents make up 19% (5,743) of the City population and 13% (12,903) of the Region's population. In 2016, Cornell reports enrollment of over 4,900 International students. The Foreign-born population has increased by about 50% since 1990 at Cornell, the City and the Region. China and Korea are the most frequent countries of origin for foreign-born residents of the City and Region. Approximately 300 Myanmar (Burma) refugees have resettled in the City and Region.
Limited English Proficiency (LEP) rates stand at 6% in the City and 4% in the Region, approximately a 50% increase since 1990. The overall LEP rate appears to correspond with the Foreign-born population. Chinese (2%), Korean (1%) and Burmese (1%) are the most spoken LEP languages.

The total number and percentage of Families with Children have seen modest reductions since 1990 at both the City and Region. Of family households, 45% contain children in the City and 44% include children in the Region.

The most common disability types in the City and Region are “ambulatory difficulty” and “cognitive difficulty” each impacting approximately 3% of the City population, and 4% of the population in the Region. Region-wide, over 3,000 persons experience difficulty with independent living, while over 2,600 persons have hearing difficulty (3%). About 1,400 persons have vision difficulty.

Source for Cornell specific data: Cornell Institutional Research (http://irp.dpb.cornell.edu/)
Relevant Data

The Dissimilarity index measures the extent to which distribution of any two groups differs over a geographic area. Dissimilarity values below 40 are considered to represent low segregation and values above 55 describe high segregation.

Racial/Ethnicity Dissimilarity measures indicate that racial and ethnic segregation in the jurisdiction is low across all categories. The range of current values range from a low of 18 for Hispanic/White segregation to a high of 35 for Asian and Pacific Islanders/White segregation. Asian and Pacific Islanders experience the highest level of segregation in the jurisdiction, but at a value that is still considered low segregation.

At the Regional level, the Dissimilarity values are 40 or below for most racial/ethnic groups, indicating generally low segregation, with one exception. The Dissimilarity value for Asian and Pacific Islander/White is 55, indicating moderate segregation between these two groups. Asian and Pacific Islanders experience the highest level of segregation in the region.

V.B.i.1.b. Identify areas in the jurisdiction and region with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.

Instructions

Relevant Data

Asian and Pacific Islanders experience the highest level of segregation but only at levels that are considered low segregation at the jurisdiction level and moderate segregation at the regional level. Clusters of Asian and Pacific Islanders are found near Cornell Campus, especially in the Collegetown neighborhood in the jurisdiction and in the Northeast neighborhood in the region. The vast majority of Asian and Pacific Islanders live in the urbanized area of the region.

The highest density of Blacks depicted on the HUD-provided maps are found in the so-called Flats neighborhoods of the jurisdiction, including Southside, Northside, Downtown and Northside Triangle neighborhoods. At a regional level, the distribution of Blacks appears to follow the general distribution of population with no clear clustering patterns by census tract.
High density of Hispanics live in the same city neighborhoods where concentrations of Asian and Pacific Islanders reside (Collegetown) as well as in the Flats neighborhoods where the highest proportion of Blacks reside. At the regional level, many Hispanics tend to live near Cornell University in the Northeast neighborhood.

The most populous foreign born residents in descending order are Chinese (3%), Korean (2%) and Canadian (1%). In the jurisdiction, all three of these groups cluster in the Collegetown neighborhood. In addition, many Chinese residents also live in the greater Fall Creek neighborhood, located downhill from Cornell University. At the regional level, Chinese (3%), Korean (1%) and Indian (1%) are the largest foreign born populations. Most foreign born residents live in the urbanized areas of the County, especially in the Northeast neighborhood.

The most common languages spoken by persons with Limited English Proficiency (LEP) are Chinese (2%), Korean (1%), Other Asian (1%), Spanish (<1%) and Hindi (<1%). Chinese LEP populations cluster in Collegetown and Fall Creek neighborhoods. Korean and Hindi speakers are tightly clustered in the Collegetown neighborhood. At the regional level, each of the LEP populations clusters near Cornell University.

The most integrated neighborhood by race/ethnicity in the City is Collegetown.

V.B.i.1.c. Explain how these segregation levels and patterns in the jurisdiction and region have changed over time (since 1990).

Instructions

Relevant Data

There is a general trend toward lower segregation values in the jurisdiction from 1990 to current time. The largest change was a 1990 value of 41 for Black/White segregation that declined to a value of 31 for Black/White segregation currently, indicating a reduction in Black/White segregation. The only increase in segregation values since 1990 is an increase from 32 to 35 currently for Asian and Pacific Islander/White categories, which is still considered low segregation.

In the region, segregation values for all group comparisons except Asian and Pacific Islander/White have remained nearly constant, with some slight reductions. The Asian and Pacific Islander/White values have increased from 50 in 1990 to 55 currently, indicating increased segregation at the census tract and block group level for these groups.

V.B.i.1.d. Consider and describe the location of owner and renter occupied housing in the jurisdiction and region in determining whether
such housing is located in segregated or integrated areas, and describe trends over time.

Instructions

An extremely high percentage of City residents are renters. Seventy-four percent of housing units are renter occupied. Neighborhoods in close proximity to Cornell University and Ithaca College have the highest percentage of rental units. Owner occupied housing rates are highest in the West Hill neighborhood, though relatively strong homeownership rates also exist in Fall Creek, Washington Park, and Belle Sherman neighborhoods.

At the regional level, 55% of housing units are renter occupied, a rate slightly above the New York State average. The highest rental housing rates occur in the urbanized areas of the region where water and sewer and transit services are located. The highest percentage of owner-occupied homes are located in rural areas of the region and in suburban locations such as South Hill in the Town of Ithaca, and the Town of Lansing.

Less than 10% of the homeowners are non-White, Non-Hispanic at the City and regional level, though these groups make up 32% and 20% of the population at the City and region respectively. The high rental rates are influenced by the fact that students make up 57% of the population of the City.

V.B.i.1.e. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future. Participants should focus on patterns that affect the jurisdiction and region rather than creating an inventory of local laws, policies, or practices.

Instructions

Based on information gathered from community engagement activities, there is a strong local perception that increased housing costs are pricing lower income residents out of the city in almost all neighborhoods, resulting in a lower racial and economic diversity in the City. If this is true, one would expect to see a decline in the Black population over time, yet the Black population in the City overall grew from 1,916 in 1990 to an estimated 2,263 in 2015. Below is at table depicting change in Black population for various neighborhoods, the City, region and Cornell University enrollment.

Change in Black Population

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<thead>
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<tbody>
<tr>
<td>HIGHER OPPORTUNITY FAMILY NEIGHBORHOODS</td>
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<td></td>
<td></td>
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<td>------</td>
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<td>------</td>
<td>------</td>
</tr>
<tr>
<td>Southside</td>
<td>352</td>
<td>278</td>
<td>178</td>
<td>NA</td>
<td>-174</td>
</tr>
<tr>
<td>Titus Flats/South of the Creek</td>
<td>178</td>
<td>127</td>
<td>86</td>
<td>NA</td>
<td>-92</td>
</tr>
<tr>
<td>Washington Park</td>
<td>153</td>
<td>115</td>
<td>75</td>
<td>NA</td>
<td>-78</td>
</tr>
<tr>
<td>Downtown</td>
<td>105</td>
<td>113</td>
<td>101</td>
<td>NA</td>
<td>-4</td>
</tr>
<tr>
<td>West Hill</td>
<td>48</td>
<td>62</td>
<td>49</td>
<td>NA</td>
<td>1</td>
</tr>
<tr>
<td>Fall Creek</td>
<td>80</td>
<td>84</td>
<td>48</td>
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<td>-32</td>
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<tr>
<td><strong>SUBTOTAL</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>-377</td>
</tr>
</tbody>
</table>

**LOWER OPPORTUNITY FAMILY NEIGHBORHOODS**

<table>
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</tr>
</thead>
<tbody>
<tr>
<td>West Hill (South of Elm Street)</td>
<td>101</td>
<td>131</td>
<td>266</td>
<td>NA</td>
<td>165</td>
<td></td>
</tr>
<tr>
<td><strong>SUBTOTAL</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>165</td>
<td></td>
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<tr>
<td>City</td>
<td>1,916</td>
<td>1,929</td>
<td>1,971</td>
<td>2,263</td>
<td>347</td>
<td></td>
</tr>
<tr>
<td>County</td>
<td>3,132</td>
<td>3,508</td>
<td>4,020</td>
<td>4,315</td>
<td>1,183</td>
<td></td>
</tr>
<tr>
<td>Cornell University</td>
<td>NA</td>
<td>819</td>
<td>933</td>
<td>1,108</td>
<td>289</td>
<td></td>
</tr>
</tbody>
</table>


Overall, it appears that the Black population in the City is increasing modestly, but declining in higher opportunity neighborhoods and concentrating as Cornell University students or locating at the West Hill neighborhood south of Elm Street where the West Village Apartments subsidized housing project is located. It appears that the increase in Black student enrollment is masking a population reduction of other Black city residents. At the regional level, the Black population has increased by 37% since 1990, possibly due to the availability of more affordable housing located further away from the City and major employers.

The HUD-provided data at the Census Tract level is unable to capture demographic patterns and trends in neighborhoods that make up only a portion of a census tract. Many Census tracts include denser urban areas combined with more suburban and rural areas located outside the jurisdiction. One pattern not well documented at the census tract level is the declining Black population in the Southside neighborhood (CT 10, BG2), where the Black population has decreased by 49% down to 178 persons in 2010 from 352 persons in 1990. Historically, the Southside neighborhood has identified as an African American neighborhood and includes anchor institutions such as the South Side Community Center and the historic AME Zion Church that serve the Black community.

Similarly, the Black population in the adjacent Titus Flats/South of the Creek neighborhood (CT 10, BG 3) decreased by 51% over this time period down to 86 Black residents. During this same time period, the West Hill neighborhood south of Elm Street (CT 10, BG 3) Black population from 101 to 266, a 160% increase. West Village Apartments, a 235 unit affordable housing project is located in this West Hill neighborhood. In each of these instances, the overall neighborhood population stayed relatively constant. While the number of Black
residents has declined in Southside and Titus Flats/South of the Neighborhood that is characterized by single family and duplex homes, a similar increase in Black residents has increased in the West Hill neighborhood located south of Elm Street where some of the most affordable, but least desired, housing is located in a large apartment complex owned and managed by an absentee landlord. This intra-Census Tract demographic pattern supports the concept that gentrification may be causing fewer housing choices for Blacks who want to remain or locate in the City.

Regarding notable City policies, adoption of the 2015 City Comprehensive Plan, Plan Ithaca, supported increasing density in the City overall, and particularly near transit, as a means to increase the supply of housing. In response, the City eliminated off-street parking requirements, increased building heights and clarified zoning in the greater downtown and Collegetown neighborhoods. These changes have resulted in significant new purpose-built student housing near Cornell University and compact, mixed-use development downtown, including residential development. Newly constructed housing carries high rent levels, that appeals mainly to college students and a more affluent population, which may increase segregation in the short-term in growth areas, though college students are more diverse than the general population. A significant increase in the housing supply will increase housing choices overall and resultant decreases in rental rates of the existing housing stock should increase integration over the long term.

V. Fair Housing Analysis > B. General Issues > i. Segregation/Integration > 2. Additional Information

V.B.i.2. Additional Information

V.B.i.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.

Instructions

See response at Question V.B.i.1.e above.

V.B.i.2.b. The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and geographic mobility options for protected class groups.
The City has strongly supported construction of Low-Income Housing Tax Credit projects (LIHTC) throughout the City, including the modification of zoning and funding assistance for the following four projects built since 2005:

- Breckenridge: 50 units in downtown
- Cedar Creek: 37 units in West Hill, south of Elm Street neighborhood
- Stone Quarry: 39 units in Titus Flats South of the Creek neighborhood (Spencer Rd.)
- 210 Hancock: 58 rental & 7 for-sale units in the Northside Triangle neighborhood

At the regional level, the Town of Ithaca has welcomed seven LIHTC projects and the Village of Dryden has supported two LIHTC projects that have created mobility options for housing near employment opportunities at the Cayuga Medical Center in the Town of Ithaca and adjacent to the public school campus at Dryden.

The County, City and Cornell created a Community Housing Development Fund in 2006 that provides $400,000 annually to assist construction of affordable housing.

HOME funds are utilized by the City to assist approximately seventy (70) low-income households/year with security deposit assistance to overcome this financial hurdle to secure desired and stable rental housing, thereby expanding geographic mobility choices.

V. Fair Housing Analysis > B. General Issues > i. Segregation/Integration > 3. Contributing Factors of Segregation

V.B.i.3. Contributing Factors of Segregation

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.

Displacement of residents due to economic pressures
There are no R/ECAPs within the jurisdiction or its surrounding county, according to HUD-provided data.

V.B.ii.1.b. Describe and identify the predominant protected classes residing in R/ECAPs in the jurisdiction and region. How do these demographics of the R/ECAPs compare with the demographics of the jurisdiction and region?
There are no R/ECAPs within the jurisdiction or its surrounding county, according to HUD-provided data, and, as such, there are not predominant protected classes to identify as residing within the R/ECAP.

V.B.i.1.c. Describe how R/ECAPs have changed over time in the jurisdiction and region (since 1990).

Instructions

Relevant Data

There were no R/ECAPs in the jurisdiction or its surrounding county in 1990, 2000, or 2010.

V. Fair Housing Analysis > B. General Issues > ii. R/ECAPs > 2. Additional Information

V.B.ii.2. Additional Information

V.B.ii.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics.

Instructions

According to HUD-provided data, there are no R/ECAPs in the jurisdiction or the region. See responses in Segregation/Integration section for additional information.

V.B.ii.2.b. The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and geographic mobility options for protected class groups.
Instructions

There are no R/ECAPs within the jurisdiction or its surrounding county.

V. Fair Housing Analysis > B. General Issues > ii. R/ECAPs > 3. Contributing Factors of R/ECAPs

V.B.ii.3. Contributing Factors of R/ECAPs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.

Instructions

V.B.ii.3. Contributing Factors of R/ECAPs - Other

There are no R/ECAPs within the jurisdiction or its surrounding county.

V. Fair Housing Analysis > B. General Issues > iii. Disparities in Access to Opportunity


V.B.iii.1. Analysis
V.B.iii.1.a. Education

V.B.iii.1.a.i. For the protected class groups HUD has provided data, describe any disparities in access to proficient schools in the jurisdiction and region.

Instructions

Relevant Data

Note: HUD's school proficiency index is ranked at the state level and ranges from 0-100. HUD uses school-level data on the performance of 4th grade students on state exams at up to three schools within three miles of census block group to describe whether neighborhoods are closer to higher or lower performing schools. The City of Ithaca has an area of only five square miles.

Total Population, City (Jurisdiction) County: The school proficiency index measures proximity between place of residence to proficient schools. HUD-provided data show that in the total population of City, Hispanics, Native Americans, and Whites all rank in the 72nd percentile on this index, meaning these groups live about the same distance to proficient schools. Asian and Pacific Islanders live somewhat closer to higher-performing elementary schools (77.65 value on the index) than all other groups. Blacks live somewhat farther away (69.45) than all other groups. There is an 8-point difference between the group that lives closest to proficient schools (Asian and Pacific Islanders) and the group that lives farthest from proficient schools (Blacks).

Population below Federal Poverty Level in the City of Ithaca: According to HUD-provided data, Whites who are below poverty level in the City have closer proximity to proficient schools than their counterparts Citywide (74.29 compared to 72.51). All other groups who are below poverty live farther away from proficient schools than their more affluent counterparts in the total population. Asian and Pacific Islanders below poverty and Whites below poverty are similar to each other in their proximity to proficient schools (75.52 and 74.29, respectively). There is an almost 9-point gap between those groups and the next groups, Hispanics below poverty and Native Americans below poverty (66.86 and 65.13, respectively). There is a 12-point difference between the group living below federal poverty level with the greatest proximity to school proficiency (Asian and Pacific Islanders at 75.52) and the group that lives farthest away (Blacks at 63.48).

Comparing groups at the two ends of the income spectrum according to proximity in residence to proficient schools, there is a 14-point difference between the total population group with closest proximity to proficient schools (Asian and Pacific Islanders 77.65) and the below poverty group below with the least proximity (Blacks, 63.48).

Total Population, County (Region): Looking at the total population of the County, Asian and Pacific Islanders again live closest to proficient schools (75.53). Native Americans (70.55), Whites (69.54), and Hispanics (68.57) live somewhat farther away. Blacks, however, live the farthest away (64.31), an 11-point gap.
Population below Federal Poverty Level in the Region and County: In the County, the greatest variation (almost 12 points) occurs in the data for populations below federal poverty with Asian and Pacific Islanders (78.87) living closest to proficient schools and Whites living farthest away (66.92). Three groups below federal poverty in the County--Asian and Pacific Islanders (78.87), Hispanics (69.89), and Blacks (69.25)--live closer to proficient schools than their counterparts in the total County population. Native Americans below poverty (67.74) live farther away than their counterparts in the total County population. Whites below poverty show less access to proficient schools than the protected groups who are below poverty.

V.B.iii.1.a.i. For the protected class groups HUD has provided data, describe how the disparities in access to proficient schools relate to residential living patterns in the jurisdiction and region.

1 Instructions

1 Relevant Data

As discussed in the Segregation section, Asian and Pacific Islander populations are more tightly clustered in East Hill-area neighborhoods near Cornell University (Collegetown and Belle Sherman), roughly between Northeast and Belle Sherman Elementary Schools, both high-performing schools. Children in the lower West Hill neighborhood, which includes a large, multi-family housing site, are bused to Cayuga Heights Elementary, which is over 3 miles away. Busing is intended to increase opportunity to school proficiency. Busing does not necessarily address neighborhood-level disparity in non-school affordances.

Overcoming Transportation Barriers to Family Involvement and Extra-Curricular Activities: Depending on distances, busing may place burdens (such as time lost from study or recreation, inability to join extracurricular activities) on the students who are bused. To overcome this inequity, a local coalition of volunteers and professionals formed the School Success Transportation Coalition (SSTC), whose goal is to "share information and foster solutions to our local school-related transportation challenges" and eliminate transportation as a barrier to family involvement and extracurricular engagement. Ithaca City School District (ICSD) and Cornell Cooperative Extension (CCE) are organizational partners in this effort. Projects of SSTC include:

- **Transportation Liaisons:** Training an ICSD staff member to be a Transportation Liaison in each school to help families find the transportation they need.
- **Ridesharing Support:** Collaborating with staff and parents to encourage ridesharing and connecting families who want to share more rides.
- **TCAT Bus Passes for secondary students:** Providing TCAT passes for students who can use them to get to and from extracurricular activities and events.
- **Organize REDSchoolRides [a volunteer driver network] or family engagement:** This volunteer driver network helps
parents and caregivers without transportation get to important school meetings or events, enabling critical engagement with their child's education.

- **Support Innovative Transportation Solutions:** The group works continues to imagine, develop and support innovative transportation services and solutions.

SSTC helps an average of thirty-five families a year to attend school functions and meetings. The group has helped parents without private transportation attend parent-teacher conferences at the school site, and also arranged for conferences to occur closer to families' residences. ICSD now includes ridesharing forms in informational and sign-up packets for extracurricular activities. SSTC makes policy suggestions to ICSD so that enrichment opportunities are designed with equity in mind and reach the greatest amount of students.

V.B.iii.1.a.iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss programs, policies, or funding mechanisms that affect disparities in access to proficient schools.

Ithaca City School District has created catchment areas to promote diversity and equity in area schools by drawing together students from different neighborhoods, and providing busing.

- Belle Sherman Elementary: Southside and Belle Sherman
- Beverly J. Martin Elementary: West Hill, Downtown, Washington Park and Northside Triangle
- Cayuga Heights Elementary: Lower West Hill and Cayuga Heights
- Fall Creek Elementary: South of the Creek and Fall Creek
- Northeast Elementary: East Hill and Collegetown
- South Hill Elementary: South Hill and suburban and rural areas of the Towns of Ithaca and Danby
- Caroline Elementary: Rural communities of Brooktondale and East Hill neighborhoods near Cornell

Beverly J. Martin Elementary School is the most racially-diverse elementary school inside the jurisdiction and has the highest teacher to student ratio, indicating more children with disabilities are enrolled. BJM has lower proficiency than other elementary schools in the City of Ithaca. It received a School in Need of Improvement (SINI) designation in 2007 under the No Child Left Behind education act, and was
removed from the list two years later. Between 2007-2009, the school went through a School Quality Review and comprehensive education planning process required by the State of New York, which involved development of a leadership team of staff, parents, and higher-education professionals.

The **Housing for School Success Program** is a CDBG-funded pilot program at Beverly J. Martin Elementary School (BJM) designed to help children of families who have experienced recent homelessness. Children and their parents are connected in-school supportive services to tenant-based rental assistance within City boundaries, in order to increase school and housing stability and minimize the disruption children experience when schooling is interrupted and/or disrupted by changing schools due to housing loss.

The **School Success Transportation Coalition (SSTC)** works to reduce transportation barriers in Ithaca City School District. See *discussion above, at Question V.B.iii.1.a.ii.*

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V.B.iii.1.b. Employment

V.B.iii.1.b.i. For the protected class groups HUD has provided data, describe any disparities in access to jobs and labor markets by protected class groups in the jurisdiction and region.

- Instructions
- Relevant Data

**City of Ithaca (Jurisdiction)**

**Labor Market Engagement, total population:** Among the total population of the City, Whites (72.61) rank slightly higher (a difference of less than 2 points) in labor market engagement than the two other groups in the low 70th decile: Native Americans (71.61) and Blacks (70.80). Hispanics (69.20) are similarly situated on the index labor market engagement. There is a 3.41 point variation between the aforementioned four groups. Asian and Pacific Islanders (65.65) have the lowest labor market engagement ranking. Total point separation between most engaged and least engaged groups is 6.92 points, indicating the engagement in the labor market is similar across all...
racial/ethnic groups in the total population. Data are also available by race and ethnicity for the subgroup of residents who work and are below poverty. Notably, Native Americans and Blacks below the poverty line in Ithaca are engaged in the labor market at a higher rate than any group in the total population. See below for discussion.

**Jobs & Poverty (Labor Market Engagement, City of Ithaca Residents, below federal poverty level):** There is high labor market participation in the labor force by people living in poverty, in some cases higher than that of the total population. Blacks and Native Americans in poverty are employed at higher rates than all people in the total population. Blacks living in poverty rank almost 2 points higher in labor market engagement than Whites in the total population (above poverty). Compared to other protected groups below poverty, Blacks rank 9 index points higher than the next most labor-engaged group below poverty, Asian and Pacific Islanders, and nearly 8 points higher than Whites below poverty, in connection to work and poverty. Native Americans (80.71) below poverty rank highest of all groups, in total population or below poverty, on the labor market index.

<table>
<thead>
<tr>
<th>City Total Population</th>
<th>Labor Market Index</th>
<th>City Below Poverty</th>
<th>Labor Market Index</th>
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<tbody>
<tr>
<td>White</td>
<td>72.61</td>
<td>White</td>
<td>66.54</td>
</tr>
<tr>
<td>Black</td>
<td>70.80</td>
<td>Black</td>
<td>74.51</td>
</tr>
<tr>
<td>Hispanic</td>
<td>69.20</td>
<td>Hispanic</td>
<td>64.65</td>
</tr>
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<tr>
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<td>71.61</td>
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</tbody>
</table>

**Job Proximity Index among Total City Population:** In general, Ithacans live a bit closer, though not substantially so, to their jobs than the nationwide average. Blacks (57.99) are most likely of all groups in the City to live near their jobs, followed by Whites (55.63), Native Americans (55.17), and Hispanics (54.25). Asian and Pacific Islanders live farthest from their jobs (51.66). The total point difference between groups with highest (Black) and lowest (Asian and Pacific Islander) job proximity is 6.33. **Job Proximity and Poverty:** Among City residents who are employed but living in poverty, Blacks (67.81), are most likely to live near their jobs, followed by Hispanics (66.53) and Whites (64.31). Asian and Pacific Islanders (60.67) and Native Americans (55.58) are least likely to live their near their jobs. There is a total difference of 12.23 points between the groups that live closest to and farthest away from their work.

**Tompkins County (Region)**

**Labor Market Engagement, total population:** Within the County, groups show strikingly similar labor market engagement, with four groups in the 74th percentile: Blacks (74.48), Asian and Pacific Islanders (74.68), and Native Americans (74.17) and Whites (74.16). Hispanics (72.50) have a slightly less engagement, though still similar to the other groups. **Job Proximity:** When it comes to job proximity, there is less similarity among groups. Blacks (70.29) have the highest job proximity of any other group of County residents, followed by Hispanics (65.43). Both of these groups show greater job proximity to their jobs than Whites (62.46). Other protected groups, Asian and Pacific Islanders (61.94) and Native Americans (59.54), have jobs less proximate to their residences. The total point difference between the group with the most job proximity (Blacks) and that with the least (Native Americans) is 10.75.
**Jobs & Poverty in the County:** As with in the City, but to an even greater degree, there is high labor market participation by people living in poverty. Blacks (78.78) and Native Americans (81.58) below federal poverty level are again the groups with the highest labor market engagement. Blacks in poverty have an even higher labor market attachment in the County than in the City by 4.26 points. All other groups (Hispanics, Asian and Pacific Islanders, and Whites) show labor market engagement elsewhere in the 70th decile. **Job Proximity:** County residents who are employed and living in poverty are less likely than their City counterparts to live close to their work. Hispanics (62.78) below poverty live closest to their work, followed by Blacks (60.94), then Asian and Pacific Islanders (58.10), Whites (55.13), and Native Americans (53.41). There is a 9.37 point difference between the group in poverty with the most job proximity (Hispanics) and that with the least (Native Americans).

<table>
<thead>
<tr>
<th>County Residents (below federal poverty level)</th>
<th>Labor Market Index (high to low)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Native American</td>
<td>81.58</td>
</tr>
<tr>
<td>Black</td>
<td>78.78</td>
</tr>
<tr>
<td>Asian and Pacific Islander</td>
<td>75.49</td>
</tr>
<tr>
<td>White (not protected group)</td>
<td>72.20</td>
</tr>
<tr>
<td>Hispanic</td>
<td>71.47</td>
</tr>
</tbody>
</table>

V.B.iii.1.b.ii. For the protected class groups HUD has provided data, describe how disparities in access to employment relate to residential living patterns in the jurisdiction and region.

---

**Instructions**

1. Instructions
2. Relevant Data

Every weekday, 15,000 people commute into the City and 5,000 commute out. Most of the region’s main employers (Cornell University, Ithaca College, City of Ithaca, Tompkins County) are headquartered within the City limits. These sites are served by transit routes. Of course, a distant commuter must have access to transit into the City in order to connect to the routes serving major employers.

There are fewer transit routes and connections in the County, where housing is more affordable, than there are in the City.

HUD-provided data show high utilization of transit by people in protected classes inside the City, especially those below the poverty level.

In the County, transit usage by people in protected classes who are below poverty is high-- in the 70th decile or higher-- and is a minimum of fifteen points higher than transit utilization by County residents across groups who are above poverty.
<table>
<thead>
<tr>
<th>County Residents (below federal poverty level)</th>
<th>Transit Index</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>68.99</td>
</tr>
<tr>
<td>Black</td>
<td>76.11</td>
</tr>
<tr>
<td>Hispanic</td>
<td>78.44</td>
</tr>
<tr>
<td>Asian and Pacific Islander</td>
<td>84.29</td>
</tr>
<tr>
<td>Native American</td>
<td>87.80</td>
</tr>
</tbody>
</table>

Particularly notable is HUD's data which reveals people in protected classes below the poverty level, rank high on both labor market participation and transit utilization indices.

People below poverty level are more likely to be reliant on transit, by virtue of their lack of resources for private transportation. To remain attached to the labor market, people of low incomes must find housing that is transit-accessible. HUD information for County residents in protected classes below poverty shows less residential proximity to jobs (they live farther from their jobs), yet strong attachment to the labor market. Comparing labor market engagement and transit indices side-by-side for County protected class residents, seems to indicate a strong connection—both indices show rankings solidly in the 70th percentile range. Though transit may be used for purposes other than work, the labor market index coupled with data about lack of proximate jobs supports the idea that transit is crucial for employment and job retention.

Housing unaffordability in Ithaca is a well-established. More affordable housing options exist in the County than in the City, but this housing is farther from the majority of the employment opportunities. For people in protected groups living below poverty in the County, and especially for Blacks and Native Americans, HUD-provided data show strong attachment to the labor force, in spite of the low proximity to jobs. The bridge between labor market engagement and job proximity is transit. When people can access transit to reach their jobs, they maintain employment. Unfortunately, in many cases, only the barest transit options are available outside the City. In many cases this means limited routes and schedules, mainly centered around morning and evening commuting. Often the jobs people travel to are not sufficient for lifting them above poverty. Employees who live far from jobs and rely on public transportation (especially if such transportation is limited) experience the disadvantage of having less "flexibility" to stay late, arrive early, or change shift in order to meet employer needs. This, in turn, may limit access to higher-paying off-hour shifts or promotion opportunities.

2010 Traffic Analysis indicates that the farther out from City-center a resident lives, the more likely a private vehicle is used for work trips. Though the majority of work trips originating in the outer-reaches of the County are made by people driving alone, carpooling activity is not insignificant. (Source: "Mode Choice by Traffic Analysis Zone," 2010 Census CTPP (2010 ACS) prepared by the Ithaca-Tompkins County Transportation Council - 6/14/16.)

A local report entitled "Lighting the Way: Learning from People with Limited Transportation Options" underscored carpooling as an important, though fragile, transportation strategy for low-income workers. Carpooling centered around a single car means when the car breaks down, the job retention of more than one person is in danger. In short, residential distance from work increases vulnerability to transportation-related employment retention problems. Consultation with area experts indicates that the Tompkins County Consolidated Transportation Planning group acknowledges this problem in their planning.
V.B.iii.1.b.iii. Informed by community participation, any consultation with other relevant government agencies, and the participant’s own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to employment.

### Relevant Data

**Addressing Employment Disparities:** Community Development Block Grant (CDBG) funding currently supports three programs designed to increase access to employment. Hospitality Employment Training Program (HETP), a program of Greater Ithaca Activities Center, and Work Preserve of Historic Ithaca are two employment readiness and placement programs that assist low to moderate income (LMI) individuals with barriers to employment to prepare for and be placed in employment. Hospitality, in particular, has been identified by GIAC as a sector that affords growth and mobility in our City and region. Cornell Cooperative Extension’s Food Entrepreneurship Program assists LMI individuals to develop catering and food-vending businesses by linking program participants to such assets and resources as certified kitchen facilities, administrative assistance, industry experts, business planning, and publicity.

**Addressing Transportation Barriers to Employment:** In 2006, the Tompkins County Department of Social Services (DSS) established a transportation planning role (now called Chief Transportation Planner) to address the unfilled mobility needs of persons with disabilities, older adults, and people with limited incomes. This role administers funding from a variety of federal sources and coordinates with area agencies to provide services that mass transit cannot address. The Chief Transportation Planner oversees the Coordinated Public Transit-Human Services Transportation Plan (Coordinated Plan) and mobility projects.

**Mobility projects for 2017 included:**

- Call Center support (ride scheduling) for FISH [a volunteer-driver program providing rides to medical appointments]
- Operating assistance for Easy Access Low Income Carshare Memberships
- Operating assistance for FISH [volunteer transportation to medical appointments]
- Operating assistance for FISH Regional Pilot [to provide transportation to medical appointments outside the County]
- Operating assistance for Gadabout, a local non-profit transportation service for older residents and people with disabilities
- Mobility management ("travel training") for adults with disabilities, to access employment and services
- Mobility management funding for Finger Lakes Rideshare

Past projects have included CityVan, a pilot project providing rural van service; funding for car repairs needed by LMI individuals to retain employment; and taxi vouchers for working LMI persons needing help with reverse commuting.

**Gadabout** (noted above) provides rides to work for people with disabilities and older adults more affordably than taxi rides (Gadabout costs the rider $2.00-$3.00 per ride).
**Existing Gaps and Future Planning:** Funding for transportation and mobility projects tend to exist in silos. Technical expertise is needed to leverage funding and fully comply with its requirements. More services are needed, particularly for ensuring reliable transportation-to-work options. Consultations reveal that within the region, but also the jurisdiction, there is a large number of people with very few options other than owning a vehicle. Owning a vehicle is costly to acquire, maintain, insure and fuel, and when the vehicle fails or finally breaks down, employment is quickly jeopardized. This problem is not unique to Ithaca or Tompkins County; communities nationwide experience the same. The above-described programs are not as robust as is needed to fill the needs of the many LMI individuals in Ithaca and Tompkins County constantly confronting transportation barriers. Yet, the region and jurisdiction appear to have a greater number of resources attempting to address these mobility hardships than do most communities in the surrounding Upstate New York area.


V.B.iii.1.c. Transportation

V.B.iii.1.c.i. For the protected class groups HUD has provided data, describe any disparities in access to transportation related to costs and access to public transit in the jurisdiction and region.

1 Instructions

2 Relevant Data

*HUD has compiled indices to compare transit trips taken and transit cost. Values on the indices are percentile ranked nationally from 0-100. The higher the value on applicable indices, the more residents utilize public transit and experience low cost for transit.*

Transit is an important asset that is well-utilized by members of protected classes in both the City and the County. HUD-provided data confirm that people in poverty are highly engaged in the labor market. *See Employment.* They utilize transit more frequently than those who are more affluent. Reliable transportation is essential to employment retention. Maintaining or expanding existing transit routes at existing fares is essential for preserving access to the labor market. Increasing transit or developing robust alternative-transportation options could boost employment opportunity or choice, providing people who are already employed access to jobs with better, higher-paying opportunities, and allowing those who are not employed to become so.
**Access by City Residents:** In general, in the City of Ithaca, HUD-provided data show that transit utilization, also known as "access," by all protected and non-protected groups is in the 70th percentile. For those persons living below the federal poverty line, transit utilization by all protected and non-protected groups increases to the 80th percentile. These values are percentile-ranked nationally; higher index values often reflect better access to public transportation, according to HUD. Data indicate Blacks, whether above or below the poverty level, utilize transit by 4-7 points less than other groups in the City of Ithaca. Two other indices should be considered while examining transit utilization: Low Transit Cost and Job Proximity. Blacks rank a bit lower (1-3%) on the Low Transit Index, indicating that relative to income, transit is a bit more expensive for Blacks than other groups; transit cost could be a use-inhibitor. Blacks above and below poverty also have the highest ranking on the Job Proximity index, so perhaps members of this group walk, bike, or carpool to work more often than those in other groups.

**Access by County Residents:** In the County, utilization of transit by members of protected classes in the total population is lower than in the City, but still in the 60th and 70th percentiles (except for Native Americans, who have lower utilization). Among people living below federal poverty who belong to protected classes in the County, transit utilization rises significantly, by 16 points for Blacks, 18 points for Hispanics, 11 points for Asians, and 37 points for Native Americans (the 70th and 80th percentiles).

**Cost for City and County Residents:** According to HUD-provided data, transit costs are relatively low for City and County residents, whether or not they are below poverty level.

**Transit Utilization within the City of Ithaca by Total Population:** HUD-provided data (Table 12 - Opportunity Indicators by Race/Ethnicity) show high transit utilization ("access") by all protected class groups in the City of Ithaca. On a 0-100 point index, with 100 being highest possible transportation utilization, all groups within the City of Ithaca show utilization in the 70th percentile; there is a difference of 4.29 points between the groups showing highest and lowest amount of transit utilization (Asian/Pacific Islander and Black, respectively).

**Transit Utilization Index by Race/Ethnicity (Total Population) in the City of Ithaca, NY**

<table>
<thead>
<tr>
<th>Group</th>
<th>Transit Index</th>
</tr>
</thead>
<tbody>
<tr>
<td>White, Non-Hispanic</td>
<td>77.38</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>73.57</td>
</tr>
<tr>
<td>Hispanic</td>
<td>74.73</td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>77.86</td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>77.61</td>
</tr>
</tbody>
</table>

**Transit Utilization within the City of Ithaca by Population Living Below the Federal Poverty Line:** Persons living below the federal poverty line in the City of Ithaca utilize transit in greater numbers than their counterparts in the total population. All groups in the City of Ithaca show utilization in the 80th decile. Among people living below the federally-defined level of poverty. Here, the difference of 7.29 points in utilization between the groups showing highest and lowest amount of transit utilization (Asian/Pacific Islander and Black, respectively).
### Transit Utilization Index by Race/Ethnicity (Total Population) in the County/Region

<table>
<thead>
<tr>
<th>Group</th>
<th>Transit Index</th>
</tr>
</thead>
<tbody>
<tr>
<td>White, Non-Hispanic</td>
<td>88.5</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>82.48</td>
</tr>
<tr>
<td>Hispanic</td>
<td>86.34</td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>89.77</td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>87.48</td>
</tr>
</tbody>
</table>

### Transit Utilization Index by Race/Ethnicity (Total Population) in the County/Region

<table>
<thead>
<tr>
<th>Group</th>
<th>Transit Index</th>
</tr>
</thead>
<tbody>
<tr>
<td>White, Non-Hispanic</td>
<td>50.53</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>59.86</td>
</tr>
<tr>
<td>Hispanic</td>
<td>60.24</td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>72.96</td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>50.94</td>
</tr>
</tbody>
</table>

### Transit Utilization within the County/Region by Population Living Below the Federal Poverty Line:

<table>
<thead>
<tr>
<th>Group</th>
<th>Transit Index</th>
</tr>
</thead>
<tbody>
<tr>
<td>White, Non-Hispanic</td>
<td>68.99</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>76.11</td>
</tr>
<tr>
<td>Hispanic</td>
<td>78.44</td>
</tr>
<tr>
<td>Asian or Pacific Islander, Non-Hispanic</td>
<td>84.29</td>
</tr>
<tr>
<td>Native American, Non-Hispanic</td>
<td>87.40</td>
</tr>
</tbody>
</table>

V.B.iii.1.c.ii. For the protected class groups HUD has provided data, describe how disparities in access to transportation related to residential living patterns in the jurisdiction and region.

1. Instructions
Relevant Data

As noted above, protected class groups living in the County utilize transit more than Whites. Blacks and Hispanics rank approximately 10 points higher on the Transit Index than Whites; Asian/Pacific-Islanders rank 22 points higher than Whites. For those living below poverty, there is greater transit utilization across all County Residents, including Whites, though again, protected groups below poverty score higher for transit access than Whites below poverty. (Blacks rank about 7 points higher, Hispanics 9 points higher, and Asian/Pacific Islanders 14 points higher than Whites below poverty.) Overall, Whites living in the County utilize transit to a lesser degree (between 10 and 22 points less) than protected groups. This could indicate that people of color living in the County have less access to private transportation, and their higher use of transit indicates need to travel to the jurisdiction regularly for employment and services. (Transit in the region is hub-and-spoke to Ithaca, not between regional municipalities). Whites rank lower on the Job Proximity index than Blacks and Hispanic groups, meaning they are not living as close to their jobs. Therefore, lower transit use among Whites living in the County could indicate higher user of private vehicle, whether carpooling or ownership.

Data HUD has provided for AFFH does not include Transit Index data on other protected classes (familial status, disability, sex, religion). However, a recent research project funded by Tompkins County's Special Community Mobility Projects interviewed ninety-one Tompkins County residents in an effort to understand the transportation needs and barriers of low-income immigrant, rural, and/or formerly incarcerated populations in the region. Over half (64) of those interviewed indicated that transportation was an acute barrier to finding and maintaining work. Over a third of respondents (33) stated they had to quit or pass up jobs because of inability to reliably get to the job site.

About 15% of respondents, about half of whom were recent immigrants, didn't know how or where to get the bus.


V.B.iii.1.c.iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to transportation.
Housing prices are lower in rural areas of the County, however, a prevalent theme from community participation and consultation is a jobs/transportation mismatch in these places. The region's biggest employer (Cornell University) and several other major employers (Ithaca College, City of Ithaca, Tompkins County) are headquartered within City Limits. Bus service to the County's rural areas is limited. Service, if it exists, is likely to be twice a day (morning and evening). This type of schedule may be servicable for working people whose employers are willing to set a work schedule that conforms to transit availability, and when the work itself does not require variation in schedule. In all other cases, access to private transportation is a necessity. Limited transit service constrains employment opportunity.

While there is a local option for carsharing (which in some years has included a reduced-cost membership for LMI individuals), the model is geared toward user-needs that correspond to occasional errand-type trips (or trips while a private vehicle is temporarily unavailable), not continuous daily commuting.

**Transportation Coordination and Mobility Management:** Since 2006, there has been a regional effort to identify and remedy transportation service gaps. The Tompkins County Department of Social Services employs a Chief Transportation Planner to identify service gaps for people (especially older adults, people with disabilities and LMI individuals), convene stakeholders, and identify funding to marshall solutions. The Tompkins County Coordinated Transportation Planning Council meets monthly to work toward reduction of transportation barriers. See response at Question V.B.iii.1.b.iii. for discussion on programs, policies, or funding mechanisms that affect disparities to access in transportation as it relates to employment.

**Gadabout,** a forty-year old local transportation nonprofit provides transportation for people with disabilities and older adults.

**FISH,** a local volunteer network of drivers provides rides for people to medical appointments of all kinds both inside, and, on a pilot-basis this year, outside of the County.

**School Success Transportation Coalition** works to coordinate transportation for the families of students in Ithaca City Schools, in order for students and their families to participate in the academic process (e.g. parent-teacher conferences) and avail themselves of extracurricular and enrichment activities.
The Low Poverty Index measures concentration of poverty by neighborhood. A higher value indicates a family may live in a low poverty neighborhood. A lower value indicates a household may live in a neighborhood with higher concentrations of poverty.

The Black, Non-Hispanic group has the lowest Low Poverty Index (LPI) with a value of 47 in the City suggesting that households in this group are more likely to live in neighborhoods with higher concentrations of poverty. The highest LPI value is 70 for Asian or Pacific Islanders. White and Hispanic categories are grouped in the middle with 61 and 59 scores, respectively. The Native American group value is 53. Overall, the value spread between protected classes appears quite narrow. Interestingly, the LPI index values remain equal or actually increase for each subset of racial/ethnic group that also lives in poverty, suggesting persons in poverty do not have a higher likelihood of living in a neighborhood with higher concentrations of poverty than their racial/ethnic group at large in the city.

Overall, the Black, Non-Hispanic group has the least access to low poverty neighborhoods and Asian or Pacific Islanders have the greatest access to low poverty neighborhoods.

V.B.iii.1.d.ii. For the protected class groups HUD has provided data, describe how disparities in access to low poverty neighborhoods relate to residential living patterns of those groups in the jurisdiction and region.
Residential patterns of racial/ethnic and national origin groups show protected groups are clustered in census tracts with lower poverty levels where Cornell University students live. In other areas of the City and region, there are no clear correlations between the Low Poverty Index and racial/ethnic and national origin groups.

Mapping of poverty and family status by census tract does not reveal any clear geographic patterns at the City or regional level.

V.B.iii.1.d.iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to low poverty neighborhoods.

 Instructions

Census Tract #10 has the highest poverty (lowest LPI values) and includes the following neighborhoods: (1) West Hill, south of Elm Street, (2) Titus Flats & South of the Creek and (3) Southside. This large Census Tract hosts West Village Apartments, a 235-unit subsidized housing project, Ithaca Public Housing's Titus Towers and a smaller family project, and the Cedar Creek LIHTC project. Recognizing that a concentration of affordable housing existed in lower West Hill, community leaders have encouraged affordable housing developers to adopt an informal siting policy change to seek alternative locations for new projects. All new affordable housing projects since 2007 have been located in alternative neighborhoods with better access to low poverty neighborhoods. Recent larger affordable housing projects in the City have been located Downtown, Spencer Road and in the Northside Triangle neighborhoods.
Relevant Data

V.B.iii.1.e.i. For the protected class groups HUD has provided data, describe any disparities in access to environmentally healthy neighborhoods in the jurisdiction and region.

Instructions

Relevant Data

All protected class groups in the City fall within a narrow band of Environmental Health Index values from a low of 53 for Asian or Pacific Islanders to a high value of 63 for Blacks based on EPA estimates for air quality, carcinogenic, respiratory and neurological toxins by neighborhoods where these groups live. Therefore, the index does not reveal any significant disparities to environmentally healthy neighborhoods in the City.

At the region, the index scores are higher across the board, with a lowest score of 72 for Asian or Pacific Islanders and a high score of 86 for the White population. While Asians may have the lowest Environmental Health Index value at the regional level, their index value is higher than any group within the City. No major disparity by protected group is apparent for access to environmentally healthy neighborhoods in the region.

V.B.iii.1.e.ii. For the protected class groups HUD has provided data, describe how disparities in access to environmentally healthy neighborhoods relate to residential living patterns in the jurisdiction and region.

Instructions

Relevant Data

Neighborhoods in rural areas of the region have less exposure to environmental health hazards based on the EPA Environmental Health Index values. Rural areas of the region have a lower levels of protected racial/ethnic and LEP groups than urbanized areas.
V.B.iii.1.e.iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to environmentally healthy neighborhoods.

### Relevant Data

The City has pro-actively advocated for investigation and remediation of inactive hazardous waste sites at Markles Flats Coal Tar site in the Northside neighborhood, the former Emerson Power Transmission site in the South Hill neighborhood and the former Ithaca Gun factory site located above the Fall Creek neighborhood. In addition, the City has supported NYSDEC for investigation and remediation of former drycleaning operations at W. Clinton Street in the Southside neighborhood and several along W. Meadow Street in the Northside Triangle neighborhood. The former drycleaner operations are located in neighborhoods with higher concentrations of racial minority population.

With the exception of the Emerson site, all sites have substantially completed environmental remediation. There are no programs, policies or funding mechanisms that affect disparities in access to environmentally healthy neighborhoods based on protected class groups.

Comments from community participation reflected citizen interest in affordable housing with green space access and concern that sites with contamination be properly remediated.

V.B.iii.1.f.i. For the protected class groups HUD has provided data, identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors. Include how these patterns compare to patterns of segregation, integration, and R/ECAPs. Describe these patterns for the jurisdiction and region.

### Instructions

Overall, the Environmental Health Index and mapping values do not reveal significant patterns of disparity of access to healthy neighborhoods for protected class groups at the jurisdictional or regional level. There are no R/ECAPS in either the jurisdiction or the region. Both the jurisdiction and region have low levels of segregation by race/ethnicity. Racial/ethnic protected classes predominantly reside in urbanized areas of the region and are therefore exposed to environmental factors associated with urban development at higher levels, such as reduced air quality near roads and highways. Conversely, a higher proportion of families with children appear to reside in suburban and rural areas where exposure to environmental hazards are reduced.
V.B.iii.1.f.ii. Based on the opportunity indicators assessed above, identify areas that experience: (a) high access; and (b) low access across multiple indicators.

Instructions

Relevant Data

Of all Index values, the lowest values for the jurisdiction is the Low Poverty Index at 47 for Black, Non-Hispanic group. This group clusters in the census tract 10 (West Hill south of Elm St., Titus Flats and Southside), census tract 8 (Northside Triangle) and census tract 2 (Collegetown). However these same neighborhoods have strong Index scores for the Jobs Proximity Index, the Transit Index and Low Transportation Cost Index. Census tracts 10 and 2 have a lower School Proficiency Index value, but the Index does not consider that students in these areas are bused to elementary schools located in high opportunity neighborhoods. As noted previously, the Environmental Health Index appears to be primarily correlated with urban/rural characteristics of a neighborhood. The Black, Non-Hispanic group has the highest Environmental Health Index value in the city.

The area with highest access opportunities across multiple indicators is the South Hill suburban neighborhood located south of Ithaca College in the Town of Ithaca. This neighborhood was developed in the last 30 years and features many owner-occupied homes.


V.B.iii.2. Additional Information

V.B.iii.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.

Instructions
Housing prices and rents in the jurisdiction and region have increased at a faster rate than income growth, reducing housing choices for all lower income groups. The tables below show that rent levels have increased by 69% from 2000 to 2016, yet incomes over this period have only increased by at best 43% at the jurisdiction or region.

**Fair Market Rent Trends - 2-Bedroom Unit**

<table>
<thead>
<tr>
<th>Year</th>
<th>FMR</th>
<th>% Change 2000-2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>2000</td>
<td>$642</td>
<td>NA</td>
</tr>
<tr>
<td>2010</td>
<td>$958</td>
<td>NA</td>
</tr>
<tr>
<td>2015</td>
<td>1,084</td>
<td>69%</td>
</tr>
</tbody>
</table>

**Income Trends - Median Household Income**

<table>
<thead>
<tr>
<th>Year</th>
<th>City</th>
<th>County</th>
<th>% Change 2000-2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>2000</td>
<td>$21,927</td>
<td>$37,305</td>
<td>NA</td>
</tr>
<tr>
<td>2010</td>
<td>$30,919</td>
<td>$48,655</td>
<td>NA</td>
</tr>
<tr>
<td>2015 (est.)</td>
<td>$30,436</td>
<td>$52,624</td>
<td>City: 27% County: 41%</td>
</tr>
</tbody>
</table>

**Income Trends - Renter-Occupied Households**

<table>
<thead>
<tr>
<th>Year</th>
<th>City</th>
<th>County</th>
<th>% Change 2000-2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>2000</td>
<td>16,092</td>
<td>$21,433</td>
<td>NA</td>
</tr>
<tr>
<td>2010</td>
<td>19,945</td>
<td>$29,543</td>
<td>NA</td>
</tr>
<tr>
<td>2015 (est.)</td>
<td>23,116</td>
<td>$29,338</td>
<td>City: 43% County: 36%</td>
</tr>
</tbody>
</table>

HUD Table 6 - Publicly Supported Households by Race/Ethnicity - shows that Black, Hispanic, and Asian or Pacific Islander groups are over-represented in the 0-50% Area Median Income (AMI) category of households, relative to their proportion of the population. In other words, a higher percentage of these groups live in very low-income households. The difference is most pronounced for Asian or Pacific Islanders. Rents that rise at levels faster than household income growth disproportionately affects Black, Hispanic and Asian or Pacific Islander groups because these groups are over-represented among low-income households.
V.B.iii.2.b. The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).

Instructions

As noted earlier, the Ithaca City School District buses children from several lower opportunity neighborhoods to elementary schools in higher opportunity neighborhoods, which is not captured in the methodology for the School Proficiency Index. LIHTC projects constructed since 2007 have been located in transit-accessible, low poverty exposure neighborhoods.


V.B.iii.3. Contributing Factors of Disparities in Access to Opportunity

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

Instructions

Availability, type, frequency, and reliability of public transportation

Impediments to mobility

Lack of access to opportunity due to high housing costs

Lack of public investments in specific neighborhoods, including services or amenities

Location and type of affordable housing

Source of income discrimination

V.B.iii.3. Contributing Factors of Disparities in Access to Opportunity - Other
Insufficient on-campus housing at Cornell University, in combination with growing enrollment, result students outbidding non-student households for off-campus housing

Lack of clear and effective fair housing enforcement authority

Lack of tenant resource/education center

V. Fair Housing Analysis > B. General Issues > iv. Disproportionate Housing Needs

V. Fair Housing Analysis > B. General Issues > iv. Disproportionate Housing Needs > 1. Analysis

Instructions

V.B.iv.1. Analysis

V.B.iv.1.a. Which protected class groups (by race/ethnicity and familial status) experience higher rates of housing problems (cost burden, overcrowding, or substandard housing) when compared to other groups for the jurisdiction and region? Which groups also experience higher rates of severe housing cost burdens when compared to other groups?

Instructions

Relevant Data

A majority of all households in the City (52%) are cost burdened and 32% severely cost burdened. Hispanic households experience the highest rate of housing problems at both the City and regional level. Rates of housing problems are not as high at the regional level where 36% of all households experience a housing problem.
At the Jurisdictional level, 52% of households experience one or more of the following four housing problems: incomplete kitchen, incomplete plumbing and facilities, more than 1 person per room, and housing cost burden greater than 30%. It should be noted that 58% of the Jurisdictional population are college students with limited incomes. 36% of all households at the regional level experience a housing problem.

Fully 100% of the 65 of Native American, Non-Hispanic households experience a housing problem. All of the protected racial/ethnic groups experience housing problems at rates higher than the average as listed in descending order for the jurisdiction:

- Hispanic: 71%
- Black: 61%
- Asian or Pacific Islander: 55%

The same trends hold true at the regional level though at somewhat lower levels where 36% of households experience a housing problem. The lower rate of housing problems at the regional level suggest that housing is more affordable at the regional level than at the jurisdictional level.

Non-family City households are more likely to experience a housing problem than family households at both the jurisdiction and region.

A severe cost burden is defined as a household spending greater than 50% of their income on housing. In the city, 32% of households are severely cost burdened. Only 18% of the households in the region are severely cost burdened, of which 46% are household located in the City.

Protected classes experiencing higher rates of severe housing cost burden in the City are:

- Hispanic: 45%
- Asian or Pacific Islander: 44%
- Black: 43%

The same three groups experience higher rates of severe housing cost burden in the Region, though at lower levels:

- Hispanic: 38%
- Black: 37%
- Asian and Pacific Islander: 32%

A higher rate of non-family households than family households experience severe housing cost burden at the City and regional level.

V.B.iv.1.b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?
There are no R/ECAPs or highly segregated neighborhoods at the Census Tract level in the City or the region.

The areas of the Jurisdiction experiencing the highest rates of housing burdens are neighborhoods with the highest percentage of students: Collegetown, Cornell Campus and Downtown. These neighborhoods are well integrated where the predominant race/ethnicity is White. Following is a table of race/ethnicity in neighborhoods experiencing the greatest housing burdens:

Race/Ethnicity - Highest Housing Burden Neighborhoods

<table>
<thead>
<tr>
<th>Place</th>
<th>White</th>
<th>Asian</th>
<th>Hispanic</th>
<th>Black</th>
</tr>
</thead>
<tbody>
<tr>
<td>Collegetown</td>
<td>50%</td>
<td>37%</td>
<td>6%</td>
<td>3%</td>
</tr>
<tr>
<td>Cornell Campus</td>
<td>52%</td>
<td>26%</td>
<td>10%</td>
<td>7%</td>
</tr>
<tr>
<td>Lower East Hill</td>
<td>70%</td>
<td>15%</td>
<td>6%</td>
<td>3%</td>
</tr>
<tr>
<td>Downtown</td>
<td>72%</td>
<td>12%</td>
<td>6%</td>
<td>6%</td>
</tr>
<tr>
<td>City</td>
<td>68%</td>
<td>16%</td>
<td>6%</td>
<td>6%</td>
</tr>
</tbody>
</table>

These same neighborhoods have the highest rate of housing burdens at the regional level. At the regional level, the urbanized areas centered on the City experience higher rates of housing burdens than the more rural areas. The urbanized areas are well integrated racially and ethnically.

V.B.iv.1.c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing for the jurisdiction and region.
Family households do not experience severe cost burdens at a greater rate than other households. In the past decade several Low-Income Housing Tax Credit projects have been constructed that include two- and three-bedroom apartments for families, including: Linderman Creek, Cedar Creek, Overlook, Stone Quarry, Poet's Landing and 210 Hancock. These projects have helped meet the need for affordable family housing, yet an unmet demand for affordable housing remains for over 500 family households in the jurisdiction and another 1,600 in the region who remain severely cost burdened.

There are only 98 two- and three-bedroom housing units available in public housing, with no effective vacancies. The Ithaca Housing Authority administers approximately 600 Housing Choice Vouchers and Tompkins Community Action administers an additional 900 HCV. There are waiting lists for HCV and public housing units are occupied, indicating that the need for public housing and HCVs far outstrips the supply.

V.B.iv.1.d. Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.

Instructions

Over 90% of homeowners are White, Non-Hispanic at both the City and regional level. Hispanic and Asian & Pacific Islander groups in particular lag as a percentage of homeowners relative to their share of the population as shown in the following table:

Homeownership by Race/Ethnicity - City

<table>
<thead>
<tr>
<th>Race/Ethnicity</th>
<th>% of Homeowners</th>
<th>% of Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>90%</td>
<td>68%</td>
</tr>
<tr>
<td>Black</td>
<td>4%</td>
<td>6%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>1%</td>
<td>6%</td>
</tr>
<tr>
<td>Asian and Pacific Islander</td>
<td>3%</td>
<td>16%</td>
</tr>
<tr>
<td>Native American</td>
<td>1%</td>
<td>&lt;1%</td>
</tr>
</tbody>
</table>

Asian and Pacific Islanders cluster in neighborhoods located close to Cornell University.

Homeownership by Race/Ethnicity - Region

<table>
<thead>
<tr>
<th>Race/Ethnicity</th>
<th>% of Homeowners</th>
<th>% of Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>93%</td>
<td>80%</td>
</tr>
<tr>
<td>Black</td>
<td>2%</td>
<td>4%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>1%</td>
<td>4%</td>
</tr>
<tr>
<td>Asian and Pacific Islander</td>
<td>3%</td>
<td>9%</td>
</tr>
</tbody>
</table>
At the regional level, Asian or Pacific Islanders lag farthest behind when comparing rates of homeownership to their portion of the population. Asians make up 9% of the population, but only 3% of homeowners. Black and Hispanic groups also make up a smaller portion of homeowners than their percentage of the population.

Overall rates of homeownership are low in both the jurisdiction and region compared to State and national averages. 73% of the households of the jurisdiction rent.

Consultations and community participation indicates that people with disabilities face housing needs both jurisdictionally and regionally.

**Older housing stock**: A majority of the housing stock in the jurisdiction (88% according to the BestPlaces.org) was built prior to the Americans with Disabilities Act (ADA) in 1990. People with disabilities are likely to be disproportionately affected by this, as such housing is likely to contain architectural barriers or other components that limit utility.

As a result, many people with disabilities may find that their utility and/or comfort in housing could be improved through reasonable accommodation or structural modification.

**Accommodation**: Awareness of the legal standard of reasonable accommodation varies among landlords. Community participation, consultation, and other local knowledge identified at least three groups among people with disabilities that have reported difficulty obtaining reasonable accommodation from landlords:

- People who have lived in a rental unit for a long time, but now require an accommodation related to an age-related disability;
- People with invisible disabilities (examples: mental health, PTSD, chronic fatigue, chemical-sensitivity) have reported having
difficulty convincing landlords of the need for their requested accommodation;

- People with service animals (documented in 2015 Analysis of Impediments)

**Structural Modification:** By law, landlords may pass the cost of structural/architectural modifications on to the requesting tenant. According to 2016 data from the Bureau of Labor Statistics, 17.9% of people with disabilities are employed, compared to an employment-population ratio for those without a disability of 65.3%. Employed workers with a disability are more likely to work part time (34%) or be self-employed. Given that people with disabilities are less likely to be in the full-time workforce and more likely to be on a fixed income, the cost of such modifications may be prohibitive, depending what is needed. A program aimed at assisting those with mobility issues by providing temporary ramping was funded by IURA; in practice, temporary ramping can be difficult to fit to the building or lot.


V.B.iv.2.b. The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA's overriding housing needs analysis.

Instructions

N/A
Availability of affordable units in a range of sizes
Displacement of residents due to economic pressures
Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
Lack of access to opportunity due to high housing costs
Lack of public investments in specific neighborhoods, including services or amenities
Source of income discrimination

V.B.iv.3. Contributing Factors of Disproportionate Housing Needs - Other

(No other Contributing Factors)

V. Fair Housing Analysis > C. Publicly Supported Housing Analysis

V. Fair Housing Analysis > C. Publicly Supported Housing Analysis > 1. Analysis

V. Fair Housing Analysis > C. Publicly Supported Housing Analysis > 1. Analysis > a. Publicly Supported Housing Demographics

V.C.1. Analysis

V.C.1.a. Publicly Supported Housing Demographics

V.C.1.a.i. Are certain racial/ethnic groups more likely to be residing in one program category of publicly supported housing than other program categories (public housing, project-based Section 8, Other Multifamily Assisted developments, and Housing Choice Voucher

https://hudapps.hud.gov/AfhAssessment/L2/Review/131
HUD data only provides information for Public Housing and the Housing Choice Voucher (HCV) program administered by the Ithaca Housing Authority (IHA). HCVs allocated by New York State are administered in Tompkins County by Tompkins Community Action (TCA). TCA administers 998 HCVs, significantly more than the 600 HCVs administered by IHA according to HUD data. The Table below totals HCVs issued by both IHA and TCA by race/ethnicity.

Whites occupy 65% of the public housing units and hold 65% of the HCVs, somewhat lower than the White percentage of the overall population. Blacks have the highest over-representation in public housing and HCV programs relative to their proportion of the population. Blacks make up 6% of the City population and 4% of the County population, but occupy 19% of the public housing units and hold 24% of the HCVs.

### Housing Choice Vouchers Holders by Race/Ethnicity in City (Jurisdiction) and County (Region)

<table>
<thead>
<tr>
<th>Race/Ethnicity</th>
<th>IHA</th>
<th>TCA</th>
<th>Total % (Estimated)</th>
</tr>
</thead>
<tbody>
<tr>
<td>White, Non-Hispanic</td>
<td>60.68%</td>
<td>66.73%</td>
<td>64.5%</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>27.46%</td>
<td>21.43%</td>
<td>23.7%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>7.63%</td>
<td>7.9%</td>
<td>7.8%</td>
</tr>
<tr>
<td>Asian/Pacific Islander, Non-Hispanic</td>
<td>3.22%</td>
<td>1.92%</td>
<td>2.4%</td>
</tr>
<tr>
<td>Native American/Alaskan, Non-Hispanic</td>
<td>N/A</td>
<td>2.03%</td>
<td>1.26% *missing data</td>
</tr>
</tbody>
</table>

V.C.1.a.ii. Compare the racial/ethnic demographics of each program category of publicly supported housing for the jurisdiction to the demographics of the same program category in the region.
Relevant Data

Public Housing by Race/Ethnicity in City (Jurisdiction). There is no Public Housing located in the Region outside of the Jurisdiction.

<table>
<thead>
<tr>
<th>Race/Ethnicity</th>
<th>% of 328 Total Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>White, Non-Hispanic</td>
<td>64.80%</td>
</tr>
<tr>
<td>Black, Non-Hispanic</td>
<td>18.69%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>5.61%</td>
</tr>
<tr>
<td>Asian/Pacific Islander, Non-Hispanic</td>
<td>10.28%</td>
</tr>
<tr>
<td>Native American/Alaskan, Non-Hispanic</td>
<td>Not reported</td>
</tr>
</tbody>
</table>

Comparing data for the HCV program at the jurisdictional and regional level shows some variation in participation by race/ethnicity. White participation in HCVs increase from 62% at the jurisdiction to 71% at the region. Other racial/ethnic groups have lower participation rates at the regional level as compared to the jurisdiction. Twenty-one percent of the regional HCV holders are Black, still significantly higher than their 4% regional population.

V.C.1.a.iii. Compare the demographics, in terms of protected class, of residents of each program category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant program category of publicly supported housing in the jurisdiction and region. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

A significantly higher percentage of Blacks reside in public housing (65%) or are HCV holders (21%) compared to their population in general (4%).

Asian or Pacific Islanders compose 17% of the households with incomes equal to or below 50% of Area Median Income, yet only hold 2% of the HCVs.
V.C.1.b. Publicly Supported Housing Location and Occupancy

V.C.1.b.i. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs in the jurisdiction and region.

Instructions

Relevant Data

No R/ECAPS or segregated areas were identified in the jurisdiction or region at the census tract level. All public housing is located within the City, primarily in the Titus Flats/South of the Creek neighborhood and the Northside Triangle neighborhoods.

LIHTC projects in the jurisdiction are scattered through a variety of neighborhoods. At the regional level, several LIHTC projects are clustered in the western portion of the Town of Ithaca near the hospital (Overlook) and at the City/Town line (Linderman Creek), where open land, multi-family zoning and water/sewer services were available. An additional LIHTC project is located in the village of Dryden near the public school campus.

There is a clear regional geographic “doughnut” pattern showing Census Tracts located outside the City and urbanized areas host a higher percentage of HCV units than neighborhoods in the City or urbanized core. Highest rates overall of HCV locations are located in western census tracts that include West Hill (City and Town), Enfield and Newfield, where over 60% of all HCV units are located. Elevated rates of HCV locations are apparent on Map 5 in all outlying areas located furthest from the City center.

At the jurisdiction level, the highest percentage of HCV voucher units are located at West Hill and the greater Southside neighborhoods, that includes West Village apartments.
V.C.1.b.ii. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs in the jurisdiction and region.

### Instructions

- Relevant Data

**HUD-provided data does not identify the presence of any R/ECAPs or segregated areas in the jurisdiction or region.**

V.C.1.b.iii. How does the demographic composition of occupants of publicly supported housing in R/ECAPs compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs in the jurisdiction and region?

### Instructions

- Relevant Data

**HUD-provided data does not identify the presence of any R/ECAPs in the jurisdiction or region.**

V.C.1.b.iv.(A). Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category for the jurisdiction? Describe how these developments differ.

### Instructions

- Relevant Data
 Relevant Data

There are two public housing developments in the region for which HUD has provided demographic data. One development includes multi-bedroom units predominantly occupied by families, the other development is predominantly one-bedroom units and is occupied by a high number of older adults and persons with disabilities.

Fifty-five percent of public housing units are occupied by elderly persons and/or persons, compared to their 11% of the general population. Titus Towers public housing is known locally as a senior housing project, though it also includes other persons, including persons with disabilities. IHA public housing family sites primarily serve households with children (68%).

 Forty-three percent of all public housing units are occupied by persons with a disability.

LIHTC projects are diversified between family, elderly and small household units and appear to be integrated racially and ethnically, and all provide accessible units serving persons with disabilities.

*Also see response at Question D.C.1.b.v.*

V.C.1.b.iv.(B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing for the jurisdiction and region.

 Instructions

 Relevant Data

None.
V.C.1.b.v. Compare the demographics of occupants of developments in the jurisdiction, for each category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. For the jurisdiction, describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

### Instructions

1. **Relevant Data**

Comparison of Public Housing Demographics with Surrounding Neighborhood Demographics

<table>
<thead>
<tr>
<th>Title</th>
<th>Property</th>
<th>Census Tract 10</th>
</tr>
</thead>
<tbody>
<tr>
<td>Titus Towers (235 units)</td>
<td>78%</td>
<td>72%</td>
</tr>
<tr>
<td>% White</td>
<td>% Black</td>
<td>14%</td>
</tr>
<tr>
<td></td>
<td>% Asian</td>
<td>3%</td>
</tr>
<tr>
<td>% Hispanic</td>
<td>% White</td>
<td>78%</td>
</tr>
<tr>
<td></td>
<td>% Black</td>
<td>14%</td>
</tr>
<tr>
<td></td>
<td>% Asian</td>
<td>3%</td>
</tr>
<tr>
<td>Family Sites (108 units)</td>
<td>29%</td>
<td>67%</td>
</tr>
<tr>
<td>% White</td>
<td>% Black</td>
<td>29%</td>
</tr>
<tr>
<td></td>
<td>% Asian</td>
<td>28%</td>
</tr>
<tr>
<td></td>
<td>% Hispanic</td>
<td>13%</td>
</tr>
</tbody>
</table>

Racial and ethnic demographics of residents of the Titus Towers public housing project closely match demographic composition of the surrounding neighborhood. While the racial/ethnic demographics of the Public Housing Family Sites are balanced across all categories, there is an over-representation of Black and Asian residents in the public housing properties relative to the surrounding neighborhood composition of Census Tract #8.

Occupy demographic data is not available for LIHTC projects. Based on consultation with affordable housing providers, initial occupancy is typically based on a lottery of qualified applicants and subsequent occupancy is based on a first-come, first-served basis of qualified tenants. None of the LIHTC projects in the City are primarily occupied by one race/ethnicity in areas occupied largely by the same race/ethnicity. At the regional level, none of the LIHTC projects are known to be primarily occupied by one race/ethnicity in areas largely occupied by the same race/ethnicity.
V.C.1.c. Disparities in Access to Opportunity

V.C.1.c.i. Describe any disparities in access to opportunity for residents of publicly supported housing in the jurisdiction and region, including within different program categories (public housing, project-based Section 8, Other Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.

Instructions

Relevant Data

Publicly supported housing in the jurisdiction is dispersed throughout several neighborhoods that are characterized by high index values for job proximity, transit, transportation cost, low poverty, and environmental health. All schools serving City residents provide high school proficiency. As previously noted, the Ithaca City School District assigns children from several neighborhoods to alternate elementary schools to provide a better racial, ethnic, and socio-economic balance, so HUD-provided school proficiency values based on proficiency of nearby elementary schools may not be accurate. The Ithaca City School District is considered a high-performing school district with a graduation rate over 90%.

Based on local knowledge, a concentration of publicly supported HCVs reside at the West Village Apartment complex located at Lower West Hill where a perception of higher crime, drug use, physical isolation and passive management by an absentee landlord are widely held. This 235-unit project received a NYS mortgage subsidy but is operated privately. This project is located in a census block group that has experienced a large increase of Black residents over the past 20 years.

Due to extremely low rental vacancy rates in the City, several HCV holders seeking to locate in the urbanized area face a choice of renting at West Village Apartments or relinquishing their HCVs. Through public engagement activities, it was revealed that several households have elected to return their HCV unused rather than rent at West Village Apartments. The City is working on several initiatives to improve safety, walking and bicycle linkages, community gardening opportunities for residents of lower West Hill and enhanced local management and staffing at West Village apartments.

At the regional level, LIHTC projects are primarily located in areas on the edge of the urbanized area and are more distant from job centers and services, though located on transit bus lines. The infrequency and limited hours of bus service was identified as a barrier for residents who lack car ownership to access jobs, goods and services. LIHTC are generally located in areas with high index values for other opportunity indexes.
Many HCV holders reside in outlying areas, primarily located to the west of the City. Lack of convenient transit is identified as the primary issue creating disparity in access to opportunity for rural HCV holders that are not located on bus lines. Even when HCV locations are on bus lines, the infrequency and limited hours of bus service serves as a barrier to access jobs, goods and services.

V. Fair Housing Analysis > C. Publicly Supported Housing Analysis > 2. Additional Information

V.C.2. Additional Information

V.C.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.

Instructions

N/A

V.C.2.b. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or geographic mobility programs.

Instructions

The City allocates HOME funds on an annual basis for the Catholic Charities Security Deposit Assistance program that issues approximately 70 security deposits per year to low-income renter households to secure rental housing anywhere in Tompkins County, thereby increasing geographic mobility options for low-income households and HCV holders.
V. Fair Housing Analysis > C. Publicly Supported Housing Analysis > 3. Contributing Factors of Publicly Supported Housing Location and Occupancy

V.C.3. Contributing Factors of Publicly Supported Housing Location and Occupancy

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

Instructions

- Displacement of residents due to economic pressures
- Impediments to mobility
- Lack of access to opportunity due to high housing costs
- Lack of meaningful language access
- Quality of affordable housing information programs
- Source of income discrimination

V.C.3. Contributing Factors of Publicly Supported Housing Location and Occupancy - Other

(No other Contributing Factors)

V. Fair Housing Analysis > D. Disability and Access Analysis

V. Fair Housing Analysis > D. Disability and Access Analysis > Analysis
V. Fair Housing Analysis > D. Disability and Access Analysis > Analysis > 1. Population Profile

V.D.1. Population Profile

V.D.1.a. How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?

Instructions

Relevant Data

According to HUD-provided data, there do not appear to be patterns of concentration or segregation of persons with disabilities (hearing/vison/cognitive and ambulatory/self-care/independent living) in either the City/jurisdiction or the County/region.

Persons with disability aged 18-64 make up virtually the same percentage of total population in both City and County (5.47% and 5.48% respectively). However, there are more younger and older people with disabilities residing in the County than there are in the City. Children aged 5-17 with disabilities make up .72% of the County population compared to .19% in the City, which is congruent with the County's greater proportion of families. There is nearly double the amount of people aged 65+ living in the County than in the City (3.64% compared to 1.91%). Information gathered from consultations indicated that Ithaca's high property taxes prompted some people of retirement-age to move from City to County. This pattern of movement, coupled with onset of age-related disabilities, could help explain the slightly higher population of people aged 65+ with disabilities living in the County.

V.D.1.b. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges for the jurisdiction and region.

Instructions

Relevant Data
Geographic patterns do not appear to vary greatly by type of disability in either the City/jurisdiction or County/region.

V. Fair Housing Analysis > D. Disability and Access Analysis > Analysis > 2. Housing Accessibility

V.D.2. Housing Accessibility

V.D.2.a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.

Instructions

Both the jurisdiction and region have a shortage of affordable, accessible housing at all unit sizes.

V.D.2.b. Describe the areas where affordable accessible housing units are located in the jurisdiction and region. Do they align with R/ECAPs or other areas that are segregated?

Instructions

Relevant Data

There are no R/ECAPs within the jurisdiction or the region, according to HUD-provided data. Similarly, neighborhoods are relatively integrated in the jurisdiction and the region.
People with disabilities may rely on Housing Choice (Section 8) Vouchers. It has been widely reported through the community participation process that voucher holders have difficulty finding landlords that will accept vouchers. Persons with disabilities encounter this barrier throughout the City and the County. Within the City, there is the additional challenge of high-cost housing.

V.D.2.c. To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing in the jurisdiction and region?

**Instructions**

**Relevant Data**

According to HUD-provided data, 42.73% of residents in Ithaca’s public housing, administered by Ithaca Housing Authority (IHA), have a disability.

Two PHAs in the region administer a Housing Choice Voucher Program in the jurisdiction and the region:

1. IHA: 24-28% of HCVP householders are disabled
2. Tompkins Community Action (TCA): 39% of non-senior householders have a disability and 83% of elderly/senior householders have a disability.
V.D.3.a. To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

Instructions

Individuals with disabilities reside in integrated settings throughout both jurisdiction and region. There is scattered site housing operated by area nonprofits and the New York State Office for People with Developmental Disabilities (OPWDD) in neighborhoods throughout the region. Publically supported housing is open to both people with and without disabilities, and includes a minimum number of accessible units. There is a 38-unit supportive housing site in a residential neighborhood for people with mental health diagnoses. There do not appear to be segregated facilities within the region or jurisdiction.

V.D.3.b. Describe the range of options for persons with disabilities to access affordable housing and supportive services in the jurisdiction and region.

Instructions

The range of options for persons with disabilities includes the following:

- Private residence as owner or family member
- Private residence as tenant
- Scattered site group living within a residential neighborhood operated by a nonprofit or the NYS Office of People with Developmental Disabilities
- Single room occupancy in supportive housing site
- Renter of an apartment within publically supported housing site
- Homebuyer of a home within the Community Housing Trust
- Homebuyer of for-sale affordable unit

The following types of assistance may increase access to the range of options above:

- Recipient of Security Deposit program (TBRA)
- Recipient of Housing Choice Voucher Program (HCVP)
- Recipient of Tompkins County Department of Social Services housing benefit

Within the jurisdiction, there are some supportive services offered for people with disabilities living independently. Community consultation reveals that increased supportive services, especially for people with mental health conditions, could increase housing tenure/retention.
V. Fair Housing Analysis > D. Disability and Access Analysis > Analysis > 4. Disparities in Access to Opportunity

V.D.4. Disparities in Access to Opportunity

V.D.4.a. To what extent are persons with disabilities able to access the following in the jurisdiction and region? Identify major barriers faced concerning:
   i. Government services and facilities
   ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)
   iii. Transportation
   iv. Proficient schools and educational programs
   v. Jobs

Instructions

1. **Government Services and Facilities**: The City of Ithaca adopted law governing Handicapped Accessibility into its Municipal Code in November 1985. Chapter 215 Article III describes the measures that shall be taken to ensure that "*in its provision of access to public facilities or public meetings, in employment opportunities or in provision of services, programs and benefits and to ensure that a formal grievance procedure exists for anyone who believes that such discrimination has occurred.*" Public buildings must have a least one barrier-free access point. Notification of public meetings includes an accessibility statement with procedure for requesting specific accommodation.

Regionally, Tompkins County has created Transition Plans for all County Buildings, based on criteria from the "ADA Checklist for Existing Facilities" created by the Institute for Human Centered Design. The ADA Checklist focuses on four priority areas:

- Priority 1 - Approach and Entrance
- Priority 2 - Access to Goods and Services
- Priority 3 - Toilet Rooms
• Priority 4 - Additional Access

2. Public Infrastructure (e.g. sidewalks, pedestrian crossings, pedestrian signals): In 2013, the Mayor of the City of Ithaca convened a Sidewalk Task Force to study policy changes aimed at improving the jurisdiction's sidewalks. Prior to January 2014, individual property owners were obligated to make sidewalk improvements. Under this policy, repairs and maintenance were not timely, were left undone, and possibly placed undue burden on certain property owners. In January 2014, new legislation was enacted to "treat sidewalks like a shared resource" by providing more regular maintenance to existing sidewalks and building new sidewalks. A new local law, C-73 of the City Charter, established five Sidewalk Improvement Districts (SIDs) within the City and an assessment formula for maintenance, repair, and construction of new sidewalks.

• Sidewalk repair: Sidewalks with 1/4" of difference or uplift get repaired, in compliance with ADA. Resident-initiated requests for sidewalk repair for mobility or ADA-compliance are prioritized over routine maintenance calls. Program staff assesses sidewalk conditions, including for reported problems. The City generates a list of needed sidewalk repairs in early spring and repairs generally begin in April-May. Repair and improvement projects occur annually in every district.
• Sidewalk accessibility ramps are included in the work done in Sidewalk Improvement Districts. There are accessibility ramps at almost all of the intersections in the Downtown commercial district. Sidewalk ramps were prioritized for completion in this area to improve accessibility to services. While sidewalk ramps exist in residential neighborhoods, they are not at every intersection. Neighborhood accessibility ramps will increase in priority now that the commercial district is complete or nearly complete.
• Pedestrian signals: Most of the sixty (60) signalized intersections in the City of Ithaca have audio cues, such as announcement that is safe to walk and/or a countdown timer. This technology includes a sensor for ambient noise and increases the volume of the announcement as traffic or other noise increases. In addition, a project completed in 2016 upgraded several intersections to include fibro-tactile technology to increase access to individuals with both visual and auditory disabilities.

3. Transportation: Tompkins Consolidated Area Transit (TCAT) buses are equipped with lifts. People in all of the following categories are eligible for half-fare on TCAT: persons who are 60 years or older, Medicare cardholders; people who have a disability; people who receive SSI, SSD, or disabled veteran benefits. TCAT contracts with Gadabout, a nonprofit providing transportation services to people with disabilities and older adults, for paratransit services (Gadabout operates both paratransit and Gadabout’s own services, which includes service to distances beyond what paratransit provides, using the same fleet of buses).

Challenge Workforce Solutions, a workforce development organization that serves people with disabilities, receives funding through the Tompkins County Coordinated Plan to provide one-on-one "travel training" for individuals employed by or connected with Challenge. Travel training includes an overview of safety precautions; trip and back-up planning; assessing the needs of individuals to ensure travel independence; and physically riding the bus with each individual who receives training until support is no longer necessary. Gadabout and Challenge are located on the same business campus, which likely increases access to work for Challenge employees who are Gadabout users.

Paratransit-users face barriers related to scheduling and waiting that people who utilize non-paratransit buses do not. According to the TCAT website explaining paratransit, pick-ups must be scheduled approximately twelve hours in advance, at which time the rider receives a pick-up time. Pick-up times will be within an hour of a requested time, and riders are expected to be ready at least fifteen minutes before that time. Buses will wait no longer than five minutes at the pick-up location. As a result, it may be difficult for riders to schedule regular
employment transportation (to sites that do not employ several Gadabout users) or multiple appointments/activities in one day. Riders may face long wait times between rides, even if the service is running on time. When the service does not run on time, the barriers are increased.

Other small-scale transportation services exist within the jurisdiction and rely on volunteer labor. These include FISH, a service providing transportation to medical appointments, and the School Success Transportation Coalition (SSTC), which helps arrange transportation to students and their families who are/would be isolated due to lack of transportation.

TCAT, paratransit, Gadabout, and FISH all operate within the jurisdiction and the region.

4. Proficient Schools and Education Programs: Barriers to schools and educational programs were not major issues identified during community consultation. See discussion on school proficiency in Question V.B.iii.1.a.i. for information on how Ithaca City School District attempts to achieve equity in access to proficient schools.

5. Jobs: Specific job-related barriers were not raised as a concern in community consultation, although the issue of transportation-related barriers to employment for all LMI individuals living in the County/region was frequently raised. See above for discussion of Transportation barriers. The six major employers in the jurisdiction Cornell University, Ithaca College, Ithaca City School District, Tompkins County, City of Ithaca, and Wegmans, are all served by TCAT bus routes. Challenge Workforce Solutions is a nonprofit organization whose mission is "creating pathways to employment for people with disabilities or barriers." Challenge provides direct job placement for people with disabilities and also operates a supported employment program.

V.D.4.b. Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.

City of Ithaca (Jurisdiction)

1. Disability Advisory Council (DAC): The Disability Advisory Council is a group of volunteer citizens that assess problems in the City of Ithaca that present the greatest obstacles to equal rights, access, and privileges for citizens with disabilities. After conferring with staff and obtaining feedback from the community, they determine which problems and needs deserve the highest priority as well as those that have the greatest opportunity to be corrected. They communicate regularly with the Mayor and appropriate City boards for the purpose of making recommendations as to how these problems may best be resolved.
Local legislation established the current structure of the Disability Advisory Council (DAC) in 1998. On March 29, 2017, the Boards and Committees Working Group appointed by the Mayor proposed restructuring the City's many advisory groups. Under the new proposal, the Disability Advisory Council would become part of the Mobility and Transportation Commission. At the time of this writing, the proposal remains pending.

2. Assessibility Statement: The City of Ithaca adopted a Workforce Diversity Plan in July 2004 that includes Attribute #4: Accommodation for Individuals with Disabilities. It reads, in part, "The City of Ithaca is committed to providing opportunities for individuals with disabilities and recognizes the need for and benefit to offering effective adaptations in the workplace to eliminate barriers to work performance and participation."

3. Public Meeting Notices: Within the jurisdiction, legal notice of public meetings includes an accessibility statement describing the process by which specific accommodation beyond barrier-free access may be requested.

4. Process for Requesting Reasonable Accommodation: The City's accommodation procedure is as follows:

   - All meeting notices include notice that persons needing special accommodations should contact the City Clerk prior to the meeting.
   - All public meetings are held in ADA compliant locations.
   - All City-authorized special events are required to file accessibility plans.
   - Upon notice of need for special accommodation, City Clerk's office arranges for services/equipment that allow a person with a disability to participate in the meeting or event.

Additionally, Section 215-18 of Ithaca City Code outlines the grievance procedure for complaints of discrimination based on disability.

Tompkins County (Region)

1. ADA Transition Plan(s): The Tompkins County website describes the steps the County is taking to identify and remove structural barriers to accessibility. [http://www.tompkinscountyny.gov/tccp/transition2017](http://www.tompkinscountyny.gov/tccp/transition2017)

2. Reporting a ADA Accessibility Concern: The County's website states that persons with an ADA accessibility concern (which could include request for accommodation) may reach out the Compliance Program Coordinator, Department of County Administration at 607-274-5551.

V.D.4.c. Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities in the jurisdiction and region.

Instructions

Possible difficulties in achieving homeownership experienced by persons with disabilities of any and all types include:
1. **Cost:** Home prices within the jurisdiction are prohibitively expensive for the majority of City residents. The jurisdiction has a low homeownership rate of 24%.

2. **Rental Assistance is more prevalent than homeownership assistance:** People with disabilities are less likely to be employed full time than people who do not have disabilities and are more likely to have low to moderate incomes (LMI) than people without disabilities. As discussed above, the cost of homes in the jurisdiction in prohibitively expensive for the vast majority of Ithacans. Within the jurisdiction and the region, assistance for housing for LMI individuals (which includes a large proportion of people with disabilities) tends to be geared toward the rental market (HCVP, Section 8, and Tenant-Based Rental Assistance programs like provision of security deposits). While first-time homeowner programs exist, credit history and income requirements may be barriers to homeownership.

3. **Housing Stock:** The majority of the jurisdiction’s housing stock (88%) was constructed before the 1990 Americans with Disabilities Act (ADA). These dwellings likely include architectural barriers that limit the access and utility by individuals with disabilities. Likewise, the expense of retrofitting or improving these dwellings for accessibility places additional burden on (prospective) homeowners with a disability. Condominiums are a housing model that have proved accessible and affordable in other communities, however, the City is a relatively untested market for this model. Condominiums are subject to regulatory requirements (such as plan approval by the NYS Attorney General’s office, among others) which tend to lengthen the development timeline. In an already expensive market, condominiums may not be seen as viable development projects.

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V. Fair Housing Analysis > D. Disability and Access Analysis > Analysis > 5. Disproportionate Housing Needs

V.D.5. Disproportionate Housing Needs

V.D.5.a. Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities in the jurisdiction and region.

1. Instructions

2. Relevant Data
Community consultation cited Source of Income discrimination as the top concern affecting people with disabilities in regard to housing. Reasonable accommodation and the difficulty of retrofitting (removing architectural barriers) Ithaca's older housing stock were also mentioned.

People with disabilities are employed full time at lower rates than other members of the population and are more likely to be LMI. In a highly pressurized and expensive housing market such as Ithaca, people with disabilities are likely to be cost-burdened or severely-cost burdened in housing, more so if they are not housing benefit recipients or are unable to utilize a housing benefit (e.g. HCV) they do have. It is unclear to what extent people with disabilities experience the other housing burdens identified by HUD (incomplete kitchens, incomplete plumbing, and more than one person per room), though incomplete kitchens and incomplete plumbing were named as burdens in some of the housing to which people with and without disabilities were referred by the Department of Social Services.

Community consultation and local knowledge suggest that people with mental health challenges may face difficulties retaining housing due to behaviors that are associated with the mental illness, but which are not readily identified as such, or which tend to cause conflict (examples: hoarding, communication barriers). When people with disabilities lose their housing, they are again exposed to the challenges of a high cost housing market; risk of homelessness increases and health stability can suffer.

V. Fair Housing Analysis > D. Disability and Access Analysis > 6. Additional Information

V.D.6. Additional Information

V.D.6.a. Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region including those affecting persons with disabilities with other protected characteristics.

Instructions

Community consultation and local knowledge suggest that people with mental health challenges may face difficulties retaining housing due to behaviors related to their mental illness (that are not understood as being an aspect of the illness) or which tend to cause conflict (examples: hoarding, communication barriers). Specialized supportive services aimed at working with tenants and landlords to increase mutual understanding and prevent loss of housing could benefit people with disabilities and their landlords.
V.D.6.b. The program participant may also describe other information relevant to its assessment of disability and access issues.

Instructions

In 2016, he City prepared a fair housing information pamphlet that is mailed to each landlord with their notice for inspection to renew their Certificate of Compliance. The brochure specifies landlord responsibilities under Fair Housing law to make reasonable accommodations to persons with disabilities, including allowing service animals.

V. Fair Housing Analysis > D. Disability and Access Analysis > 7. Disability and Access Issues Contributing Factors

V.D.7. Disability and Access Issues Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.

Instructions

Access to publicly supported housing for persons with disabilities
Access to transportation for persons with disabilities
Lack of access to opportunity due to high housing costs
Lack of affordable in-home or community-based supportive services
Lack of affordable, integrated housing for individuals who need supportive services
Lack of assistance for housing accessibility modifications
Source of income discrimination

V.D.7. Disability and Access Issues Contributing Factors - Other
V. Fair Housing Analysis > E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

V.E.1. List and summarize any of the following that have not been resolved:
- A charge or letter of finding from HUD concerning a violation of a civil rights-related law;
- A cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law;
- Any voluntary compliance agreements, conciliation agreements, or settlement agreements entered into with HUD or the Department of Justice;
- A letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law;
- A claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing; or
- A pending administrative complaints or lawsuits against the locality alleging fair housing violations or discrimination.

Instructions

Tompkins County (Region): In April 2014, the Board of Trustees of the Village of Groton, in Tompkins County, NY enacted Local Law No. 4, entitled "Property and Building Nuisance Law" ("Nuisance Law"). On June 15, 2017, the State of New York Supreme Court, Appellate Division found the law overbroad and facially invalid under the First Amendment, and therefore, unconstitutional. In particular, the Court noted in its decision the adverse impact of the law upon victims of domestic violence: "The plain language of the law therefore tends to discourage tenants from seeking help from police. As the amici curiae assert, this discouragement may have a particularly severe impact upon victims of domestic violence (see generally Cari Fais, Note, Denying Access to Justice: The Cost of Applying Chronic Nuisance Laws to Domestic Violence, 108 Colum L Rev 1181 [2008]). If a tenant who has an order of protection against an individual because of prior domestic violence calls police for assistance in enforcing the order, points may be assessed against the property. Further,
if a tenant summons police because he or she has been the victim of a crime of domestic violence involving assault or one of the other offenses worth 12 points, the Nuisance Law automatically deems the property to be a public nuisance, placing the tenant at risk of losing his or her home solely because of this victimization."


V.E.2. Describe any state or local fair housing laws. What characteristics are protected under each law?

Instructions

New York State provides protection from discrimination in housing for the following characteristics: Age, creed, marital status, sexual orientation, and military status, in addition to the seven federally protected classes.

Tompkins County provides protection based on sexual orientation and gender identity or expression.

The City of Ithaca provides protection for the characteristics of ethnicity, gender, immigration/citizenship status, socioeconomic status, height, and weight, in addition to the federally protected classes and the above-described New York State and Tompkins County anti-discrimination protections.

V.E.3. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

Instructions

Enforcement: Local enforcement of fair housing law is extremely limited. Local law lacks meaningful enforcement mechanisms.

- City law does not authorize an enforcement entity, nor does it specify remedy for violations of its protections.
- County law similarly lacks meaningful enforcement, though for different reasons: The County authorizes the Tompkins County Office of Human Rights to enforce its protections, however, because these protections make no provision for remedy, they are
best enforced at State level.

- Enforcement of state law at the local level requires a Memorandum of Understanding (MOU) with the New York's State Division of Human Rights (SDHR). Tompkins County maintained such an MOU with the State, with OHR as the designated enforcement entity, until 2008, when the MOU lapsed. It has not been renewed since. Therefore:
  - Local claimants must file with the State on their own, unless they have legal representation.
  - Local claimants also must file federal claims on their own, unless they have legal representation. The nearest offices in which to file a federal claim is in Binghamton, NY (50 miles) or Buffalo, NY (150 miles).

**Education and Outreach**

**Tompkins County Office of Human Rights (OHR)** OHR is the agency to which area residents with fair housing concerns are most frequently referred. OHR does not have meaningful enforcement authority since its MOU with the NY State Division of Human Rights expired in 2008. OHR can assist in providing education, consultations, case review, voluntary PCC, and legal drafting, and has provided assistance is 55 housing cases in the past two years (since the 2015 Analysis of Impediments). It is up to the complainant to formally file with the SDHR as the OHR does not represent complainants or respondents.

OHR offers a voluntary Pre-Complaint Conciliation service in which both Complainants and Respondent must agree to particpate; no Pre-Complaint Conciliations have occured in the past two years.

**Capacity:** OHR has a staff of four including the director, who is an attorney, a paralegal assistant, and outreach coordinator, and an administrative assistant. In 2016 the office had a budget of approximately $305,000. In 2015, OHR prepared the City of Ithaca's Analysis of Impediments to Fair Housing. In the past two years, OHR has provided assistance on 55 housing cases. In the past year, OHR has provided nine workshops in the community on topics related to fair housing.

**Notable Advocacy:** In April 2017, OHR, along with Tomkins County Human Rights Commission, the Advocacy Center, and Cornell Law School Gender Justice Clinic, wrote to the Mayor of the Village of Groton to request repeal of the local nuisance law (Local Law No. 4) on the basis of its disparate impact on victims of domestic violence and people with disabilities. This law was found to be unconstitutional by the New York State Supreme Court Appellate Division in June of 2017.

**Central New York Fair Housing (CNYFH),** is a fair housing initiative program (FHIP)- funded Qualified Fair Housing Enforcement Organization located in Syracuse, NY, a city 55 miles to the northeast of Ithaca. In 2014, HUD added Tompkins County to CNYFH's catchment area (Source: 2015 AI). According to its website, CNYFH serves a broad geographic area encompassing eight counties in northern and central New York with a staff of six, including a staff attorney. IURA contacted CNYFH for information about its outreach and enforcement activities in the City of Ithaca or region of Tompkins County. In the past two years, CNYFH conducted one (1) training for a local service provider, Neighborhood Legal Services, in June of 2016. CNYFH currently has nineteen (19) open cases across its catchment area, which is approximately 40% more than in previous years. None are from Tompkins County. Outreach is seen as a key component to identification of fair housing issues and cases within any region; limitations of CNYFH's staff size, along with its large catchment area and its volume of open cases limits the agency's outreach capacity.
### V. Fair Housing Analysis > E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis > 4. Additional Information

#### V.E.4. Additional Information

<table>
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<tr>
<th>V.E.4.a. Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.</th>
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1. Instructions

**Enforcement:** Locally, meaningful fair housing enforcement is extremely limited. The Tompkins County Office of Human Rights appears to have appropriate experience and sufficient existing capacity to conduct enforcement, were it authorized by City and County law to do so.

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<thead>
<tr>
<th>V.E.4.b. The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.</th>
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1. Instructions

N/A

### V. Fair Housing Analysis > E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis > 5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

#### V.E.5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to,
perpetuate, or increase the lack of fair housing enforcement, outreach capacity, and resources and the severity of fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

Instructions

Lack of local private fair housing outreach and enforcement
Lack of local public fair housing enforcement
Lack of resources for fair housing agencies and organizations
Lack of state or local fair housing laws

V.E.5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors - Other

(No other Contributing Factors)

VI. Fair Housing Goals and Priorities > 1. Prioritization of Contributing Factors

VI.1. For each fair housing issue as analyzed in the Fair Housing Analysis section, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.

Instructions

A Contributing Factor "creates, contributes to, perpetuates, or increases the severity of one or more fair housing issues." Contributing Factors were reviewed and prioritized based on the following:

- Frequency of association with fair housing issues, or, broad impact across multiple issues
- Significant impact in a single area
- Public input from received via the community participation process
- Impact (limitation or denial) on fair housing choice
- Impact (limitation or denial) on access to opportunity
• Negative impact on fair housing or civil rights compliance

**Contributing Factors of Segregation**

1. Displacement due to Economic Pressure

**Contributing Factors of Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)**

*HUD-provided data, identifies no R/ECAPs in the City (jurisdiction) or County (region).*

**Contributing Factors of Disparities in Access to Opportunity**

1. Source of Income Discrimination
2. Lack of clear and effective fair housing enforcement authority
3. Impediments to mobility (lack of exception payment standards to the standard for fair market rent for the region)
4. Insufficient on-campus housing at Cornell University, in combination with growing enrollment, resulting in students outbidding non-student households for off-campus housing
5. Location and type of affordable housing

**Contributing Factors of Disproportionate Housing Needs**

1. Lack of access to opportunity due to high housing costs
2. Source of Income Discrimination
3. Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
4. Displacement of residents due to economic pressures

**Contributing Factors of Publicly Supported Housing Location and Occupancy**

1. Source of Income Discrimination
2. Lack of meaningful language access
3. Availability of affordable units in a range of sizes
4. Displacement of residents due to economic pressures

**Contributing Factors of Disability and Access**
1. Source of Income Discrimination
2. Lack of access to opportunity due to high housing costs
3. Lack of affordable in-home or community-based supportive services

**Contributing Factors of Fair Housing Enforcement, Outreach Capacity, and Resources**
1. Lack of local public fair housing enforcement
2. Lack of state or local fair housing laws
3. Lack of resources for fair housing agencies and organizations

V. Fair Housing Analysis > B. General Issues > Segregation/Integration > Contributing Factors of Segregation

Displacement of residents due to economic pressures
(No other Contributing Factors)

V. Fair Housing Analysis > B. General Issues > R/ECAPs > Contributing Factors of R/ECAPs

There are no R/ECAPs within the jurisdiction or its surrounding county.

- Availability, type, frequency, and reliability of public transportation
- Impediments to mobility
- Lack of access to opportunity due to high housing costs
- Lack of public investments in specific neighborhoods, including services or amenities
- Location and type of affordable housing
- Source of income discrimination
- Insufficient on-campus housing at Cornell University, in combination with growing enrollment, result students outbidding non-student households for off-campus housing
- Lack of clear and effective fair housing enforcement authority
- Lack of tenant resource/education center

V. Fair Housing Analysis > B. General Issues > Disproportionate Housing Needs > Contributing Factors of Disproportionate Housing Needs

- Availability of affordable units in a range of sizes
- Displacement of residents due to economic pressures
- Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
- Lack of access to opportunity due to high housing costs
- Lack of public investments in specific neighborhoods, including services or amenities
- Source of income discrimination
- (No other Contributing Factors)

Fair Housing Analysis > Publicly Supported Housing Analysis > Contributing Factors of Publicly Supported Housing Location and Occupancy

- Displacement of residents due to economic pressures
- Impediments to mobility
- Lack of access to opportunity due to high housing costs
- Lack of meaningful language access
- Quality of affordable housing information programs
- Source of income discrimination
VI. Fair Housing Goals and Priorities > 2. Fair Housing Goals

VI.2. For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Using the table below, explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.

Instructions

Goal
Goal
1. Prohibit discrimination on the basis of source of income, by establishing local (jurisdiction and region) law(s) establishing protection, authorizing enforcement entity, and creating meaningful protocol.

Contributing Factors
Source of Income Discrimination
Displacement of residents due to Economic Pressure
Location and Type of Affordable Housing
Impediments to Mobility
Lack of Access to Opportunity due to High Housing Costs
Location and Type of Affordable Housing

Insufficient on-campus Housing at Cornell University, in combination with growing enrollment, results in students out-bidding non-student households for off-campus housing

Fair Housing Issues
Disparities in Access to Opportunity
Disproportionate Housing Needs
Publically Supported Housing Location and Occupancy
Disability and Access

Metrics, Milestones, and Timeframe for Achievement
1.1 In Year 1: Gather best practices and recommendations for implementation model from among at least three communities with similar characteristics (i.e. collegetowns; high value rental markets).

1.2 In Year 2: Introduce legislation within 12 months for adoption within 24 months.
1.3 In Year 2-3: Upon adoption of legislation, publish an explanation of Source of Income Protection and the enforcement authority and protocol on the City’s website, for the purpose of educating the public to the new law, where to obtain more information, receive counseling, or file a complaint.

1.4 In Year 3: Orient landlords and tenants to new legislation in publically-available free workshops.

**Responsible Program Participant(s)**
Ithaca, NY

**Discussion**
Local and State law does not prohibit discrimination in housing based on source of income. Sixty-two percent of area landlords surveyed in March 2017 refuse to accept tenants seeking to pay a portion of their rent with a Housing Choice Voucher (HCV). While the survey completed by 90 landlords was not designed to gain statistically significant correlations, the result reinforces widespread community perceptions that many landlords do not accept third party payments. Community engagement of residents and consultation with subject matter experts indicates housing choice and opportunity are severely curtailed due to limited supply of properties accepting third party payments. HCV providers indicate that many vouchers are lost due to inability to find a willing landlord to accept a HCV in a rental market with a vacancy rate below 2%.

Discrimination in housing based on source of income disproportionately impacts Blacks and disabled persons. In the jurisdiction, 27% of HCV holders are Black, compared to 6% of the total population. Persons with disabilities under the age of 65 make up 7% of the population of the City, but compose 28% of HCV holders. The elimination of source of income discrimination and acceptance of payment for housing, regardless of source of income, will increase fair housing choice and access to opportunity.

The most common third party tenant-based rental assistance programs available are Housing Choice Vouchers (eligible for persons with very low incomes); Social Security Disability (SSD) and Supplemental Security Income Disability (SSI), which assists persons with disabilities; Veterans Affairs Supportive Housing (VASH) that assists homeless veterans; and general assistance from Tompkins County Department of Social Services, which assists homeless persons.
Goal

Goal
2. Increase supply and access to affordable housing options, particularly at extremely low, very low, and low income-levels, especially in high opportunity neighborhoods.

Contributing Factors
Source of Income Discrimination
Lack of access to opportunity due to high housing costs
Location and type of affordable housing (lack of adequate supply of affordable housing)
Lack of affordable, integrated housing for individuals who need supportive services
Community opposition (landlords not accepting Housing Choice Vouchers and other forms of government-subsized income)
Impediments to mobility (lack of exception payment standard to fair market rent)
Increasing enrollment at Cornell University (~100 student per year increase)

Fair Housing Issues
Disparities in Access to Opportunity
Publicly Supported Housing Location and Occupancy
Metrics, Milestones, and Timeframe for Achievement

2.1a In Year 2: Meet with local HVC administrators to evaluate if adopting Small Area Fair Market Rents (by zip code) or Exception Payment standards for high rent areas of the County would expand access to high opportunity neighborhoods without significant unintended consequences or a significant reduction in HCVs issued.

2.1b In Year 3: If determined to be viable and beneficial, establish Small Areas Fair Market Rents or Exception Payment standards to establish multiple payments standards within the County, in conjunction with a transition plan to mitigate any unintended consequences.

2.2a In Years 1-5: In an evermore constrained funding environment, prioritize activities that increase access to affordable housing for LMI individuals such as production of new units, security deposit assistance and tenant-based rental assistance for HUD Entitlement grant funding.

2.2b In Years 1-5: In an evermore constrained funding environment, prioritize provision of gap funding when needed to facilitate construction of new affordable housing units for HUD Entitlement grant funding.

2.3 In Years 1-5: Work with local nonprofit developers to add new affordable for-sale homes to the Community Housing Trust Fund (CHTF).

2.4 In Years 1-5: With the County, continue to engage Cornell University administration to expand the supply of on-campus and Cornell-affiliated student housing to keep pace with yearly enrollment increases, in order to alleviate pressure on local rental market from college students.

2.5 In Years 1-5: Continue annual City financial contribution to the regional Community Housing Development Fund that funds projects that create new affordable housing units.

Responsible Program Participant(s)
Ithaca, NY

Discussion
There is an acute shortage of affordable housing in the City of Ithaca. Almost three-quarters of City residents are renters, and over half of them pay over 30% of their income for housing - the standard at which renters are considered to be cost burdened. Approximately one-third of renter households are severely cost burdened paying over 50% of their income for housing. Several protected class groups experience severe housing cost burdens at elevated rates compared to the 27% rate for White, Non-Hispanic households. Black (43%), Hispanic (47%) and Asian (44%) renter households face the highest rates of severe housing cost burden.

The prevailing market rent rate varies throughout the County, yet the payment standard for the current Housing Choice Voucher (HCV) program is based on a single countywide rent standard. Rental housing units located in the urbanized area offering close proximity to employment, public transportation, services and good schools command significantly higher rents than outlying areas in the County. The 2018 HUD Small Area Fair Market rents analysis by zip code suggest the market rent for a two-bedroom apartment in the City of Ithaca is over $250 higher than a similar apartment in an outlying area that lacks convenient public transportation, so the HCV program may be overpaying in lower-rent areas and not offering enough rent for HCV holders to secure housing in opportunity neighborhoods with higher rents.

Goal

3. Establish clear local authority and meaningful mechanisms for enforcement of fair housing law.

Contributing Factors
Lack of clear and effective fair housing enforcement authority
Lack of local private fair housing outreach and enforcement
Lack of local public fair housing enforcement
Lack of resources for fair housing agencies and organizations
Lack of state or local fair housing laws
Fair Housing Issues
Disparities in Access to Opportunity.

Metrics, Milestones, and Timeframe for Achievement
3.1 In Year 1: Revise local protections to specify enforcement authority and meaningful enforcement process.
3.2 In Year 2: Introduce amended legislation within 12 months for adoption within 24 months.
3.3 In Year 3: Upon adoption of amended legislation, publish fair housing enforcement information on City website for the purpose of educating the public on where and how to obtain fair housing counseling or file a complaint.

Responsible Program Participant(s)
Ithaca, NY

Discussion
The lack of an effective legal mechanism to enforce fair housing rights was identified in the 2015 Analysis of Impediments and the City’s 2015 Fair Housing Action Plan. At that time, the Tompkins County Office of Human Rights (OHR) was drafting a comprehensive anti-discrimination ordinance that expanded protections and established clear procedures and mechanisms for enforcement at the county level, with primary enforcement authority granted to the OHR. The OHR-proposed anti-discrimination legislation has not advanced toward adoption, so the need for an effective local enforcement mechanism remains.
4. Prevent displacement of protected class households in neighborhoods where there is either an established trendline of displacement, or imminent threat of displacement. Explore Small Area Fair Market Rents, mini-repair for low-income homeowners, and expansion of the Community Housing Land Trust for owner-occupied homes as strategies to address gentrification.

**Contributing Factors**
Displacement of Residents Due to Economic Pressure

**Fair Housing Issues**
Segregation/Integration

**Metrics, Milestones, and Timeframe for Achievement**

4.1 In Year 3: Analyze home sale data across the region to identify trendlines that indicate actual and imminent threat of displacement. Indicators include neighborhood home prices rising above median for the jurisdiction and changes in neighborhood composition.

4.2 In Year 1-5: Prioritize (1) small repair (i.e. "mini repair" program) and rehabilitation of homes owned by LMI homeowners in neighborhoods identified as experiencing displacement and (2) creation of new affordable housing opportunities in gentrifying neighborhoods.

4.3a In Year 2: Meet with local HVC administrators to evaluate if adopting Small Area Fair Market Rents (by zip code) or Exception Payment standards for high rent areas of the County would expand access to high opportunity neighborhoods without significant unintended consequences or a significant reduction in HCVs issued.

4.3b In Year 3: If determined to be viable and beneficial, establish Small Areas Fair Market Rents or Exception Payment standards to establish multiple payments standards within the County, in conjunction with a transition plan to mitigate any unintended consequences.

**Responsible Program Participant(s)**
Ithaca, NY
**Discussion**
Rapidly rising rents and property taxes related to home prices were frequently cited during the community engagement process as a major concern and the primary cause for involuntary departures from a place where an individual has been living. Such commenters frequently lamented that new home locations were less desirable than their prior neighborhood.

It appears that increased housing costs are pricing lower income residents out of many neighborhoods in the City, where transit and access to services and goods are convenient, to locations outside the City or to lower opportunity neighborhoods. This trend is resulting in reduced racial and economic diversity in several neighborhoods. Between 1990 and 2015, the percentage of Black residents in Southside, Titus Flats/South of the Creek, and Washington Park neighborhoods declined by 50% as home prices and rents in these neighborhoods increased sharply. In this same time period, the number of Black residents almost tripled in the somewhat isolated West Hill city neighborhood located south of Elm Street, where the privately-owned, subsidized, 235-unit, West Village apartment complex is located.

Mapping out the location of HCV units reveals a “doughnut” pattern with relatively few units located within the City and a concentration of HCV units located to the west of the City in the Towns of Newfield, Enfield and Ithaca. Many of these outlying areas have lower market rents so HCV holders can find rental housing in these locations as the countywide HCV payment standard may exceed the local market rent, but such locations frequently require car ownership for journey to work and access to groceries and services, so the combined index of housing and transportation cost may exceed the index value in locations in the City where the market rent is higher but where transit is convenient and destinations are often within walking distance.

**Goal**

5. Address the need for a Language Assistance Plan (LAP) for Limited English Proficient (LEP) individuals.

**Contributing Factors**
Lack of meaningful language access for individuals with limited English proficiency.

**Fair Housing Issues**
Disparities in Access to Opportunity
Metrics, Milestones, and Timeframe for Achievement

5.1 In Year 3: Revise City (Limited English Proficiency (LEP) Plan in order to incorporate a Language Assistance Plan (LAP) in order to increase access to City services and programs for persons from varying ethnic backgrounds.

5.2 In Year 4: Implement LAP across City departments.

5.3 By Year 5: Partner with existing community groups to conduct outreach to LEP individuals, service providers, and the general public to raise awareness of the new LAP, its purpose, and how to access it.

Responsible Program Participant(s)
Ithaca, NY

Discussion
The 2015 City of Ithaca Fair Housing Action Plan endorsed the 2015 Analysis of Impediments finding that the lack of a Language Assistance Plan (LAP) for Limited English Proficient (LEP) individuals constituted an impediment to fair housing for LEP persons. The City of Ithaca recently reaffirmed its commitment to fostering a city that is welcoming and inclusive for all individuals, regardless of nationality or citizenship status. 4.6% of the residents of the City are Limited English Proficiency individuals according to HUD-provided data. The top three LEP languages are Chinese, Korean and Burmese.

International students make up almost 20% of the students enrolled at Cornell University, including a higher percentage of graduate students. While the students generally have strong English language skills, their family members may have limited English proficiency. Many of these students and their families are City residents. No matter the reason a person with Limited English Proficiency has come to Ithaca, the City seeks to ensure their inclusion. It is therefore important for the City establish a Language Assistance Plan to increase access to City services and fair housing resources.
Goal

6. Address policies and practices that result in displacement, eviction of, and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking.

Contributing Factors
Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking

Fair Housing Issues
Disproportionate Access to Opportunity
Fair Housing Enforcement

Metrics, Milestones, and Timeframe for Achievement
1.1 In Year 4: Request the assistance of local experts (Freedom from Violence Workgroup) to convene task force to identify and recommend best practices for protecting the housing rights of domestic violence survivors.

1.2 In Year 5: Collaborate with the Advocacy Center to provide training on specific rights and protections for domestic violence survivors from housing discrimination.

Responsible Program Participant(s)
Ithaca, NY

Discussion
Victims of violence or other crime need to be able to call the police for protection without fear that loss of housing will result. In addition to the specific protections for the specific protections for DV survivors provided by the Violence Against Women Act (VAWA), DV survivors are protected under FHA. HUD has found that discrimination against DV survivors can constitute sex discrimination, as four out of five DV survivors are women.

Goal

**Goal**
7. Create an Affirmatively Furthering Fair Housing-directed goal within the 2018-2023 Consolidated Plan.

**Contributing Factors**

*Any Contributing Factor identified by this Assessment for the City of Ithaca applies here.*

**Fair Housing Issues**

Disparities in Access to Opportunity

Disproportionate Housing Needs

Segregation

Disability and Access

**Metrics, Milestones, and Timeframe for Achievement**

7.1. In Year 1: Add new goal to 2019-2023 Consolidated Plan.

7.2 In Year 2: In time for 2019 Action Plan Funding Cycle, establish guidance (i.e. review criteria) for projects considered for funding in each Action Plan cycle that prioritizes those projects that address one or more underlying priority contributing factors that create, contribute to, perpetuate or increase the severity of a fair housing issue.
Responsible Program Participant(s)
Ithaca, NY

Discussion
HUD Entitlement funds awarded to the City provide discretionary annual fiscal resources to fund projects and programs that expand access to opportunities, increase the supply of affordable housing and address other fair housing issues. The 5-Year Consolidated Plan creates a strategic plan for use of HUD Entitlement funds. Establishment of an AFH-directed goal in the Consolidated Plan will help direct funds to projects that advance fair housing goals and encourage applicants for funding to consider how their project address fair housing issues.

Documents

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Maps

**Map 1 - Race/Ethnicity** (Race/Ethnicity)
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Ithaca, NY Region (.//.//ArcGisV04/Map/V04/AFFHT0002/100/363168/R)

**Map 2 - Race/Ethnicity Trends** (Race/Ethnicity Trends, 1990)
**Race/Ethnicity Trends, 1990**
Ithaca, New York Jurisdiction (.//.//ArcGisV04/Map/V04/AFFHT0002/200/363168/J)
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**Race/Ethnicity Trends, 2000**
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**Race/Ethnicity Trends, 2010**
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**Map 3 - National Origin** (National Origin)
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Ithaca, NY Region (.//.//ArcGisV04/Map/V04/AFFHT0002/300/363168/R)

**Map 4 - LEP** (Limited English Proficiency)
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Ithaca, NY Region (.//.//ArcGisV04/Map/V04/AFFHT0002/400/363168/R)

**Map 5 - Publicly Supported Housing and Race/Ethnicity** (Publicly Supported Housing and Race/Ethnicity)
Ithaca, New York Jurisdiction (.//.//ArcGisV04/Map/V04/AFFHT0002/500/363168/J)
Ithaca, NY Region (.//.//ArcGisV04/Map/V04/AFFHT0002/500/363168/R)

**Map 6 - Housing Problems** (Housing Burden and Race/Ethnicity)
**Housing Burden and Race/Ethnicity**
Ithaca, New York Jurisdiction (.//.//ArcGisV04/Map/V04/AFFHT0002/600/363168/J)
Ithaca, NY Region (.//.//ArcGisV04/Map/V04/AFFHT0002/600/363168/R)
Households experiencing one or more housing burdens in Jurisdiction and Region with race/ethnicity, national origin, and families with children dot density maps and R/ECAPs
Ithaca, New York Jurisdiction (.//././/ArcGisV04/Map/V04/AFFHT0002/601/363168/J)
Ithaca, NY Region (.//././/ArcGisV04/Map/V04/AFFHT0002/601/363168/R)

Map 7 - Demographics and School Proficiency (School Proficiency and Race/Ethnicity)
School Proficiency and Race/Ethnicity
Ithaca, New York Jurisdiction (.//././/ArcGisV04/Map/V04/AFFHT0002/700/363168/J)
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School Proficiency and National Origin
Ithaca, New York Jurisdiction (.//././/ArcGisV04/Map/V04/AFFHT0002/701/363168/J)
Ithaca, NY Region (.//././/ArcGisV04/Map/V04/AFFHT0002/701/363168/R)

School Proficiency and Family Status
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Ithaca, NY Region (.//././/ArcGisV04/Map/V04/AFFHT0002/702/363168/R)

Map 8 - Demographics and Job Proximity (Job Proximity and Race/Ethnicity)
Job Proximity and Race/Ethnicity
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Job Proximity and National Origin
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Job Proximity and Family Status
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Map 9 - Demographics and Labor Market (Labor Market and Race/Ethnicity)
Labor Market and Race/Ethnicity
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Labor Market and National Origin
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Labor Market and Family Status
Ithaca, New York Jurisdiction (../../../ArcGisV04/Map/V04/AFFHT0002/902/363168/J)
Ithaca, NY Region (../../../ArcGisV04/Map/V04/AFFHT0002/902/363168/R)

Map 10 - Demographics and Transit Trips (Transit Trips and Race/Ethnicity)
Transit Trips and Race/Ethnicity
Ithaca, New York Jurisdiction (../../../ArcGisV04/Map/V04/AFFHT0002/1000/363168/J)
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Transit Trips and National Origin
Ithaca, New York Jurisdiction (../../../ArcGisV04/Map/V04/AFFHT0002/1001/363168/J)
Ithaca, NY Region (../../../ArcGisV04/Map/V04/AFFHT0002/1001/363168/R)

Transit Trips and Family Status
Ithaca, New York Jurisdiction (../../../ArcGisV04/Map/V04/AFFHT0002/1002/363168/J)
Ithaca, NY Region (../../../ArcGisV04/Map/V04/AFFHT0002/1002/363168/R)

Map 11 - Demographics and Low Transportation Cost (Low Transportation Cost and Race/Ethnicity)
Low Transportation Cost and Race/Ethnicity
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Low Transportation Cost and National Origin
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Ithaca, NY Region (../../../ArcGisV04/Map/V04/AFFHT0002/1101/363168/R)

Low Transportation Cost and Family Status
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Ithaca, NY Region (../../../ArcGisV04/Map/V04/AFFHT0002/1102/363168/R)

Map 12 - Demographics and Poverty (Poverty and Race/Ethnicity)
Poverty and Race/Ethnicity
Ithaca, New York Jurisdiction (../../../ArcGisV04/Map/V04/AFFHT0002/1200/363168/J)
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Poverty and National Origin
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Poverty and Family Status
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Ithaca, NY Region (.//../ArcGisV04/Map/V04/AFFHT0002/1202/363168/R)

Map 13 - Demographics and Environmental Health (Environmental Health and Race/Ethnicity)
Environmental Health and Race/Ethnicity
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Environmental Health and National Origin
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Environmental Health and Family Status
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Ithaca, NY Region (.//../ArcGisV04/Map/V04/AFFHT0002/1302/363168/R)

Map 14 - Disability by Type (Hearing, Vision and Cognitive Disability)
Hearing, Vision and Cognitive Disability
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Ithaca, NY Region (.//../ArcGisV04/Map/V04/AFFHT0002/1400/363168/R)

Ambulatory, Self-Care and Independent Living Disability
Ithaca, New York Jurisdiction (.//../ArcGisV04/Map/V04/AFFHT0002/1401/363168/J)
Ithaca, NY Region (.//../ArcGisV04/Map/V04/AFFHT0002/1401/363168/R)

Map 15 - Disability by Age Group (Disability by Age Group)
Ithaca, New York Jurisdiction (.//../ArcGisV04/Map/V04/AFFHT0002/1500/363168/J)
Ithaca, NY Region (.//../ArcGisV04/Map/V04/AFFHT0002/1500/363168/R)

Map 16 - Housing Tenure (Housing Tenure by Renters)
Housing Tenure by Renters
Tables

**Table 1 - Demographics** - Demographic data for Jurisdiction and Region (including total population, the number and percentage of persons by race/ethnicity, national origin (10 most populous), LEP (10 most populous), disability (by disability type), sex, age range (under 18, 18-64, 65+), and households with children)
Ithaca, New York (363168) (././././.ArcGisV04/Table/V04/AFFHT0002/1/363168)

**Table 2 - Demographic Trends** - Demographic trend data for Jurisdiction and Region (including the number and percentage of persons by race/ethnicity, total national origin (foreign born), total LEP, sex, age range (under 18, 18-64, 65+), and households with children)
Ithaca, New York (363168) (././././.ArcGisV04/Table/V04/AFFHT0002/2/363168)

**Table 3 - Racial/Ethnic Dissimilarity Trends** - Race/ethnicity dissimilarity index for Jurisdiction and Region
Ithaca, New York (363168) (././././.ArcGisV04/Table/V04/AFFHT0002/3/363168)

**Table 4 - R/ECAP Demographics** - Data for the percentage of racial/ethnic groups, families with children, and national origin groups (10 most populous) for the Jurisdiction and Region who reside in R/ECAPs
Ithaca, New York (363168) (././././.ArcGisV04/Table/V04/AFFHT0002/4/363168)

**Table 5 - Publicly Supported Housing Units by Program Category** - Data for total units by 4 categories of publicly supported housing in the Jurisdiction (Public Housing, Project-Based Section 8, Other Multifamily, Housing Choice Voucher (HCV) Program) for the Jurisdiction
Ithaca, New York (363168) (././././.ArcGisV04/Table/V04/AFFHT0002/5/363168)

**Table 6 - Publicly Supported Households by Race/Ethnicity** - Race/ethnicity data for 4 categories of publicly supported housing (Public Housing, Project-Based Section 8, Other Multifamily, HCV) in the Jurisdiction compared to the population as a whole, and to persons earning
30% AMI, in the Jurisdiction
Ithaca, New York (363168) (../../../ArcGisV04/Table/V04/AFFHT0002/6/363168)

**Table 7 - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category** - Data on publicly supported housing units and R/ECAPs for the Jurisdiction
Ithaca, New York (363168) (../../../ArcGisV04/Table/V04/AFFHT0002/7/363168)

**Table 8 - Demographics of Publicly Supported Housing Developments, by Program Category** - Development level demographics by Public Housing, Project-Based Section 8, and Other Multifamily for the Jurisdiction
Ithaca, New York (363168) (../../../ArcGisV04/Table/V04/AFFHT0002/8/363168)

**Table 9 - Demographics of Households with Disproportionate Housing Needs** - Tabular data of total households in the Jurisdiction and Region and the total number and percentage of households experiencing one or more housing burdens by race/ethnicity and family size in the Jurisdiction and Region
Ithaca, New York (363168) (../../../ArcGisV04/Table/V04/AFFHT0002/9/363168)

**Table 10 - Demographics of Households with Severe Housing Cost Burden** - Data of the total number of households in the Jurisdiction and Region and the number and percentage of households experiencing severe housing burdens by race/ethnicity for the Jurisdiction and Region
Ithaca, New York (363168) (../../../ArcGisV04/Table/V04/AFFHT0002/10/363168)

**Table 11 - Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children** - Units by Number of Bedrooms and Number of Children – Data on the number of bedrooms for units of 4 categories of publicly supported housing (Public Housing, Project-Based Section 8, Other Multifamily, HCV) for the Jurisdiction
Ithaca, New York (363168) (../../../ArcGisV04/Table/V04/AFFHT0002/11/363168)

**Table 12 - Opportunity Indicators by Race/Ethnicity** - Data of opportunity indices for school proficiency, jobs proximity, labor-market engagement, transit trips, low transportation costs, low poverty, and environmental health for the Jurisdiction and Region by race/ethnicity and among households below the Federal poverty line.
Ithaca, New York (363168) (../../../ArcGisV04/Table/V04/AFFHT0002/12/363168)

**Table 13 - Disability by Type** - Data of persons with vision, hearing, cognitive, ambulatory, self-care, and independent living disabilities for the Jurisdiction and Region
Ithaca, New York (363168) (../../../ArcGisV04/Table/V04/AFFHT0002/13/363168)

**Table 14 - Disability by Age Group** - Data of persons with disabilities by age range (5-17, 18-64, and 65+) for the Jurisdiction and Region
Ithaca, New York (363168) (../../../ArcGisV04/Table/V04/AFFHT0002/14/363168)
Table 15 - Disability by Publicly Supported Housing Program Category - Data on disability and publicly supported housing for the Jurisdiction and Region
Ithaca, New York (363168) (../../../ArcGisV04/Table/V04/AFFHT0002/15/363168)

Table 16 - Homeownership and Rental Rates by Race/Ethnicity - Data of homeownership and rental rates by race/ethnicity for the Jurisdiction and Region
Ithaca, New York (363168) (../../../ArcGisV04/Table/V04/AFFHT0002/16/363168)