

2017 Assessment of Fair Housing, City of Ithaca, NY

Factors Contributing to Fair Housing Problems



City of Ithaca Request for Proposals (RFP) for 2019 Action Plan: Introduction & Information for Applicants

The City of Ithaca conducted its Assessment of Fair Housing (AFH) in 2017 for incorporation into its 2019-2023 Consolidated Plan (“Con Plan”). The Con Plan is used to prioritize community needs and guide use of the City’s HUD entitlement funding for five years. The Con Plan is carried out through Annual Action Plans, which provide a concise summary of the activities and projects selected each year to address the Con Plan’s priority needs and specific goals.

NEW! Incorporating the AFH into the Con Plan: Two of the ways the City of Ithaca will incorporate the findings and goals of its 2017 Assessment of Fair Housing into the Con Plan are by:

- (1) Including a new question in Annual Action Plan applications asking applicants to describe how their proposed project would address any one of the identified factors contributing (“Contributing Factors”) to fair housing issues and problems in Ithaca. *See below for discussion of the Contributing Factors.*
- (2) Adding “Promotion of Fair Housing” to the application’s Selection Criteria.

Background: Assessment of Fair Housing in the City of Ithaca

In 2015, HUD announced it would provide new tools (data and maps), so local communities could analyze and understand fair housing conditions in a more cohesive and systematic way. In addition to the new tools, a new process was introduced that was intended to help communities promote equity and meet their obligations to affirmatively further fair housing. This new process, required of all communities, was called the **Assessment of Fair Housing (AFH)**.¹ Each community’s AFH would be incorporated into its Consolidated Plan, the five-year plan guiding its local use of HUD entitlement funding.²

HUD asked each community conducting the Assessment of Fair Housing (AFH) to systematically consider the same housing problems (“**fair housing issues**”), like segregation, concentrations of poverty by race or ethnicity (“Racially/Ethnically Concentrated Areas of Poverty” or “R/ECAPs”), differing levels of access to opportunity based on race, sex, religion, and other protected statuses, and more. HUD identified these fair housing problems as widespread across the nation and also recognized the existence of many **contributing factors**. Moreover, HUD acknowledged the factors that create fair housing problems manifest themselves and combine with other factors in different ways, in different communities. For example, in some communities, segregation occurs due to historic local government policy decisions, while in others, it occurs because of other types of barriers or institutions, like systemic lending discrimination, or market conditions that disproportionately impact housing choices of people in protected classes.

¹ HUD issued this final Affirmatively Further Fair Housing rule in 2015. A small number of communities piloted the AFH in 2016. The City of Ithaca was among the first 125 communities in the U.S. to conduct the AFH in 2017. In 2018, HUD then suspended the rule to Affirmatively Further Fair Housing, until 2020 or indefinitely (according to different HUD-issued communications). It also removed the tools (maps and data) from the public domain.

² Since the City of Ithaca completed its AFH prior to suspension of the rule, it will incorporate it into its 2019-2023 Consolidated Plan, as planned.

After analyzing HUD data and maps for their own jurisdictions, communities were supposed to further consider community input, local consultation with a variety of stakeholders, and other local sources of knowledge to identify the local factors that contribute to fair housing problems. HUD provided a list of common contributing factors, but communities could identify factors other than those listed. Once identified, communities were required to **prioritize** and **justify**, or rank each factor for its impact and explain why it contributed to problematic or unfair conditions.

Methodology & Justification for Identifying Contributing Factors in Assessment of Fair Housing

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 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

FAIR HOUSING ISSUE ANALYZED BY ASSESSMENT OF FAIR HOUSING <i>The problem preventing fair housing</i>	CONTRIBUTING FACTOR LOCALLY IDENTIFIED THROUGH ANALYSIS <i>An element creates or is partly responsible for the problem</i>	RANKING <i>Local impact of identified factor</i>	JUSTIFICATION <i>Basis for identifying contributing factor as one that magnifies the fair housing problem</i>	ADDITIONAL INFORMATION <i>Notes and further explanation</i>
1 - Segregation/ Integration	Displacement of residents due to economic pressure	1	Broad impact across multiple issues	Data suggest that several historically affordable neighborhoods are becoming unaffordable and experiencing loss of Black residents while at the same time the neighborhoods are growing in opportunity. Private investment combined with high demand for housing is increasing the rent and property values, units are becoming unaffordable.
2 - R/ECAPs	No R/ECAPs	N/A	N/A	N/A
3 - Disparities in Access to Opportunity	Source of Income Discrimination	1	Frequency of association with fair housing issues; Public input, Impact (limitation or denial) on fair housing choice; Impact (limitation or denial) on access to opportunity	Local and State law does not prohibit discrimination in housing based on source of income. 62% of area landlords surveyed in March 2017 stated their properties do not accept HCV or other subsidies. Community engagement of residents and subject matter experts indicates housing choice and opportunity are severely curtailed due to limited supply of properties accepting vouchers; many vouchers are lost due to inability to find willing landlord.
	Lack of clear and effective fair housing enforcement authority	2	Negative impact on fair housing or civil rights compliance	Fair housing testing conducted in conjunction with the 2015 Analysis of Impediments indicated evidence of discrimination, including outright rejection of applicants with service animals. Without a local enforcement authority, suspected discrimination in housing cannot be effectively addressed.
	Impediments to mobility (lack of exception payment standards to the standard for fair market rent for the region)	3	Impact (limitation or denial) on fair housing choice; Impact (limitation or denial) on access to opportunity	Exception payment standards should be investigated as a tool for increasing access to housing in high opportunity neighborhoods by Housing Choice Voucher holders.
	Insufficient on-campus housing at	4	Broad impact across multiple issues; Public input	Students comprise 57% of the City of Ithaca's population. Though Cornell University recently made substantial investment in student housing by building 600 new

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	Cornell University, in combination with growing enrollment, resulting in students outbidding non-student households for off-campus housing			undergraduate units, University enrollment continues to increase by approximately 100 students each year. Supply must continually increase to meet enrollment to alleviate pressure on the Citywide housing market.
	Location and type of affordable housing	5	Broad impact across multiple issues; Public input	
4 - Disproportionate Housing Needs	Lack of access to opportunity due to high housing costs	1	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	
	Source of Income Discrimination	2	Frequency of association with fair housing issues; Public input, Impact (limitation or denial) on fair housing choice; Impact (limitation or denial) on access to opportunity	See explanation above at <i>Disparities in Access</i> .
	Displacement of and/or lack of housing support for victims of domestic violence, dating	3	Negative impact on fair housing or civil rights compliance; Significant impact in a single area	

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	violence, sexual assault, and stalking			
	Displacement of residents due to economic pressures	4	Broad impact across multiple issues	See explanation above at <i>Segregation</i> .
4 - Publically Supported Housing Location and Occupancy	Source of Income Discrimination	1	Frequency of association with fair housing issues; Public input, Impact (limitation or denial) on fair housing choice; Impact (limitation or denial) on access to opportunity	“Publically support housing” includes Housing Choice Vouchers, and other government benefits or subsidies. Inability to use the voucher due to landlord refusal further constrains housing location. (See further explanation above at <i>Disparities in Access</i> .)
	Lack of meaningful language access	2	Negative impact on fair housing or civil rights compliance; Significant impact in a single area	
	Availability of affordable units in a range of sizes	3	Broad impact across multiple issues	
	Displacement of residents due to economic pressures	4	Broad impact across multiple issues	See explanation above at <i>Segregation</i> .
5 - Disability and Access	Source of Income Discrimination	1		See explanation above at <i>Disparities in Access</i> .
	Lack of access to opportunity due to high housing costs	2		
	Lack of affordable in-home or community-based supportive services	3		
6 - Fair Housing Enforcement,	Lack of local public fair housing enforcement	1	Negative impact on fair housing or civil rights compliance	

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Outreach Capacity, and Resources	Lack of state or local fair housing laws	2	Negative impact on fair housing or civil rights compliance	
	Lack of resources for fair housing agencies and organizations	3	Negative impact on fair housing or civil rights compliance	