Assessment of Fair Housing
First Thoughts

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From experience helping local governments and public housing authorities complete Assessments of Fair Housing (AFH), we at the Coalition understand the more knowledge program participants have when starting their AFH process, the better the end result. There are a lot of things to know about the AFH, so to help program participants start thinking about the process, this article provides a few basic but essential tips.

The AFH process will quickly be consumed by stakeholder consultation, resident meetings, data collection and analysis, public hearing schedules, and drafting and revising the actual Fair Housing plan. This discussion should be a catalyst for participants to be thinking about their own process and what that looks like for their jurisdiction.

Think About the User Interface

The User Interface (UI) is a web-based portal for program participants to complete and submit an AFH and is also where the AFH Assessment Tool is housed.

The portal is accessed through HUD's secure system and is only available to program participants, who are referred to as "Business Partner Organizations." Business Partner Organizations include Public Housing Authorities already registered in the HUD PIH Inventory Management System (PIC) or Multifamily Housing Entities which include consolidated plan program participants, States, and Insular Areas.

How to Access the User Interface

Registering for access to the UI should be considered a first step in preparing the AFH. The lead agency will designate a "system coordinator" and all other registrants are considered "users".

The system coordinator is considered the primary administrator, and obtains and distributes user IDs. Upon approval of the system coordinator's application, an ID will be assigned and mailed to the CEO or Executive Director of the specified HUD-registered entity. System coordinators also maintain user profiles and assigns roles within the UI.

To register, individuals or organizations must have an active HUD Secure Systems user account or an established business relationship with the submitting agency.

The registration process for multifamily housing entities and public housing agencies is essentially the same for system coordinators and users. Both systems require participants to select either the Coordinator or the User button. The two systems do require different information, as is outlined below.

Multifamily housing entities:

- Program participants register through the HUD Multifamily Business Partner Registration System (APPS) at https://hudapps2.hud.gov/public/wass/public/participant/partreg_page.jsp

- To complete registration, the registrant must know the organization's Tax Identification Number or Social Security Number for individuals.

Public housing agencies:

- Must already be registered in the HUD PIH Inventory Management System (PIC).

- Program participants in public housing agencies registers through this web site: https://hudapps.hud.gov/public/wass/public/pha/phareg_page.jsp

- Potential registrants must know the organization's name and ID number.

Think About Local Data

The development of the AFH requires a significant amount of data analysis. HUD provides data to aid program participants in the evaluation of the fair housing issues in their jurisdiction as well as for the regional analysis required for the AFH. The data provided by HUD is based on nationally available data sets and has limitations in accuracy, timeliness, and the degree to which it examines the protected classes under the Fair Housing Act. To address this issue, HUD requires program participants to supplement their AFH analysis with local data and local knowledge. The regulations at 24 CFR 5.152 define local data as: "metrics, statistics, and other quantified information, subject to a determination of statistical validity by HUD, relevant to the program participant's geographic area of analysis, that can be found through a reasonable amount search, are

readily available at little or no cost, and are necessary for the completion of the AFH using the Assessment Tool."

Identifying local data sources can be a lengthy step in the AFH process. This information is typically gathered through research conducted by the program participant, as well as through the community participation process. Interviews, focus groups, or community meetings with stakeholders will play a crucial role in identification of local data sets.

There are many sources to examine when researching local data at the state, county, and municipal level. In Florida, some statewide organizations that analyze housing and 'opportunity' data include the Shimberg Center for Housing Studies at the University of Florida, the United Way of Florida – ALICE Report, the Florida Commission on Human Relations, Florida Realtors, the Florida Housing Coalition, and many other organizations where participants can access information in the areas of homelessness, economic development, lending and banking practices, and other issues addressed in the AFH.

Within their jurisdiction, program participants should also turn to groups requiring consultation for a complete assessment, including the local Continuum of Care, housing providers, social service agencies, community-based and regionally-based organizations, local and regional fair housing organizations, public housing authorities, business and civic leaders, adjacent jurisdictions, and regional government/planning agencies.

For an even stronger assessment, program participants should consider consulting with, and seeking data from, other organizations that address issues that impact fair housing. These complementary organizations include: transit agencies, school districts, real estate developers, housing finance agencies, civil rights organizations, chambers of commerce, state and local universities, tenant/resident organizations, and realtors, property managers, and lenders, and advocates for persons protected by the Federal Fair Housing Act, as well as any local fair housing ordinances. This process will not only help program participants gather data related to fair housing issues in the region, but also develop a working relationship with stakeholders working in the field, and to improve coordination in ongoing projects.

Think About HUD Data

The issues examined in the AFH are complex. In the assessment, program participants will review issues like concentrations of racial/ethnic minorities in areas of poverty, the location of

protected classes in poor-quality school catchment areas, and housing burdens faced by each of the protected classes. Each of these issues deserves methodologically rigorous analysis. Anything less runs the risk of violating a program participant's obligation to affirmatively further fair housing.

HUD has developed the Affirmatively Furthering Fair Housing (AFFH) Data and Mapping Tool, a robust tool to help program participants conduct the AFH. This tool, not to be confused with the AFH Assessment Tool, offers access to quantitative data on disparities between the general population and protected classes under the Fair Housing Act and so facilitates a fact-based conversation on fair housing choice and access to opportunity. The tool includes prepopulated tables, cleaned data sets, and readily available dot-density maps.

How to Find HUD Data

The Affirmatively Furthering Fair Housing Data and Mapping Tool is available on the HUD website at https://egis.hud.gov/affht/. Alternatively, you can search for 'affht' in your internet browser and click on the HUD AFFHT entry. Once there, select the state you are interested in, then select the jurisdiction. That's it! You now have at your fingertips a wealth of data related to the landscape of fair housing in the jurisdiction and region.

Dot Density Maps

The AFFH Data and Mapping Tool relies on dot density mapping. A dot density map shows concentrations of some variable – in this case, Fair Housing Act protected classes.   Each dot represents a certain number of persons represented by that variable. For instance, if you choose to see concentrations of racial/ethnic minorities, each dot on the map represents between 1 and 100 persons. Keep in mind, dot location is not precise – if a dot is located on the East side of a street, that does not mean persons of that race/ethnicity only live on the East side of the street.

Fair Housing Issues

The AFFH Data and Mapping Tool includes data for all prescribed fair housing issues in the AFH. As you complete each section of the AFH, HUD asks you to examine specific data sets in the AFFH Data and Mapping Tool and analyze the results. When examining fair housing issues, keep in mind your knowledge of local issues, events and trends are often more important than the data from the tool. With that said, using data prescribed in the AFFH Data and Mapping Tool supports meaningful, data-driven assessments.

Read the Data Documentation

As with any data set, it is important to understand the meaning of the data provided. HUD has released data documentation for the AFFH Data and Mapping Tool, providing critical information on the source and time frame of data, index formulas, and explanations of appropriate analyses. Before making any conclusions in your AFH, you must understand the details behind the data.

Final Thoughts

Preparation of the AFH is an extensive process that participants should start 10–12 months prior to their submission deadline. This article touched on a few things every participant should become familiar with to complete their AFH, but there are many questions participants should consider early in the process including:

- When is your AFH submission deadline?
- Will you collaborate with other participants?
- Who will those collaborating partners be?
- What stakeholders should be involved?
- What are the citizen participation requirements for the AFH?
- What are the requirements for updating your Citizen Participation Plan?

Initially, learning about the AFH can be overwhelming, but if you keep these topics in mind, start the process early, and stay on top of critical elements you will find it to be to your benefit. Pre-planning the AFH will allow for a more streamlined process and, in the end, will save a lot of time and stress. **HNN**

Resources:

- AFFH Rule Guidebook: https://www.hudexchange.info/resource/4866/affh-rule-guidebook
- User Interface Registration: https://portal.hud.gov/hudportal/documents/huddoc?id=hudafhuserregguide.pdf.
- AFFH Data and Mapping Tool User Guide: https://www.hudexchange.info/resource/4849/affh-data-and-mapping-tool-user-guide

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