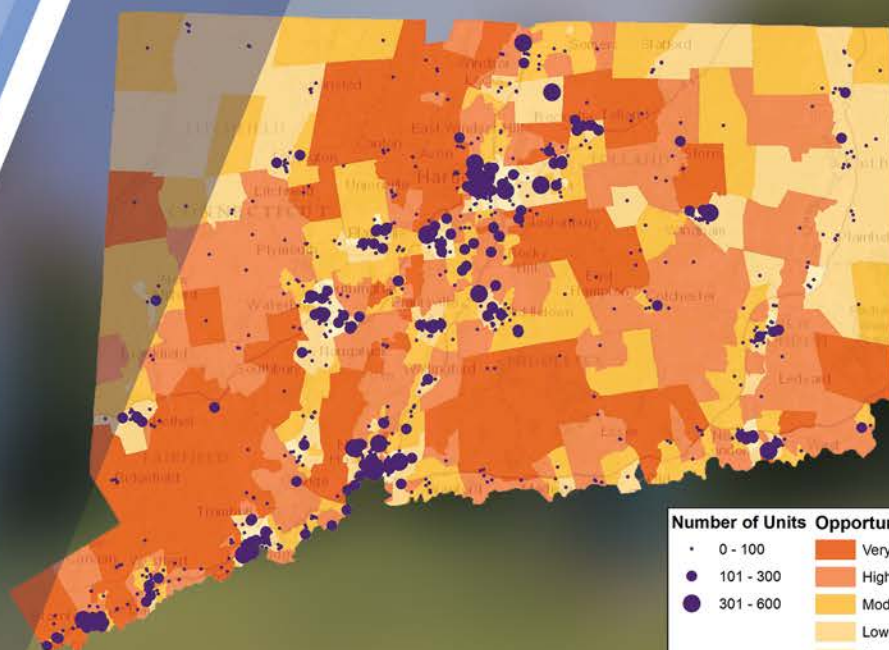


OUT OF BALANCE



Subsidized Housing, Segregation and Opportunity in Connecticut

SEPTEMBER 2017



BY Erin Boggs, Esq. and Lisa Dabrowski, Esq.

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INTRODUCTION

Our state's challenge is to foster diverse neighborhoods that promote success for all our children.

Too often, geography defines life outcomes for low-income families, and particularly low-income families of color. The evidence is irrefutable – neighborhood matters in Connecticut. Children in lower income communities have less access to high quality schools and are exposed to greater health and safety hazards that jeopardize their development than children in our more affluent communities.

Our state's challenge is to foster diverse neighborhoods that promote success for all our children. To do this, it is imperative that we undertake two tasks. First, we must identify and implement strategies that transform struggling areas into thriving communities. This is a tall order because, as a nation, our best research has yet to identify a single “magic bullet” that reliably lifts up struggling cities or rural communities in decline without fostering involuntary displacement. Solutions are more likely to be multifaceted and require long-term commitments and an ability to balance competing interests. But we must persevere.

Thus our second task is to spur policies that reverse segregation and support greater choices in affordable housing locations for low-income families and particularly for low-income families of color and other groups who have historically been denied housing choices. Our nation's painful history of intentional government-sponsored segregation, and current seemingly entrenched housing policies, separate us by race and income. And this has consequences: Data reveals significantly improved outcomes for low-income families who choose to move from high poverty to lower poverty neighborhoods, if they have that option.

Getting this right is essential for all of us: Connecticut has an educational achievement gap that hurts children and threatens our economic competitiveness. Where a child lives and goes to school has a direct and significant impact on that child's life chances – because we rely on property taxes to fund schools and because the opportunities available to children vary so widely among towns. One way to address this challenge is to invest further in schools and services in under-resourced communities. Another way to address this challenge is to make sure that we balance our state investments to create more affordable housing in towns with greater opportunity, to give more children a better chance to succeed. In Connecticut, we have to do both. We cannot keep asking our cities to shoulder all the burden of ameliorating poverty; and we cannot keep asking our children to wait.

Charting the way forward requires an understanding of the role that subsidized housing policies have played in promoting or limiting access to opportunity. For this to be meaningful we must have a tool to assess neighborhood characteristics and compare different areas to one another. Opportunity Mapping, combining a collection of neighborhood indicators to determine each neighborhood's access to resources that are associated with positive life outcomes, is one such tool.

What we find when we overlay the location of government subsidized affordable housing units on Opportunity Maps of Connecticut is a consistent pattern, and in many ways an old story. Blacks and Latinos are living in struggling, opportunity-isolated areas at far higher rates than other groups. Further, government-supported affordable housing is located overwhelmingly in areas that are assessed as having fewer opportunity structures, such as higher performing schools, that lead to success in life. Because, on average, as compared to Whites and Asians, Blacks and Latinos have disproportionately lower incomes, they have a similarly disproportionate need for government subsidized affordable options. Opportunity isolation is a major driver of many racial, ethnic, and income disparities in areas such as education, health, employment and more. This geographical separation by race, ethnicity, and income contributes to deeper societal divides that undermine the fabric of our democracy and government.

The goal of this report is to engage a broader array of citizens and policymakers in exploring the causes of and solutions to the opportunity divide. The data show that, despite our aspirations and shared goals for fairness, housing segregation persists at an extremely high level in Connecticut and denies opportunities to children and families. We can work together to create a more balanced plan for subsidized housing in Connecticut.

Getting this right is essential for all of us: Connecticut has an educational achievement gap that hurts children and threatens our economic competitiveness.



EXECUTIVE SUMMARY: FINDINGS & RECOMMENDATIONS

Opportunity Mapping and the current data available on subsidized housing in Connecticut reveal a stunning and disturbing pattern: government subsidized affordable housing is overwhelmingly concentrated in areas of “lower opportunity” and generally excluded from areas of “higher opportunity.” This pattern of housing segregation cements poverty in place, and disproportionately impacts low-income people of color and others who are unable to find affordable housing in communities with an array of resources, high performing schools, and more opportunities.

MEASURING OPPORTUNITY

Connecticut was first introduced to Opportunity Mapping in 2009 in a report produced by the Kirwan Institute for the Study of Race and Ethnicity and commissioned by the Connecticut Fair Housing Center. This first Opportunity Mapping endeavor revealed deep geographical inequalities in access to opportunity by race and ethnicity.

Over three quarters of all the affordable housing available through the five state programs analyzed in this report are in low opportunity areas of our state—and this has not changed in decades.

Opportunity Mapping in Connecticut generated much discussion and debate from municipal leaders, housing developers, anti-poverty advocates and other stakeholders, and led to an examination of the unequal distribution of opportunity. For some, it confirmed the notion of “two Connecticuts,” one with resources and one without. Some commentators rightly cautioned that misuse of Opportunity Mapping could result in unfair condemnation of neighborhoods that all too often face criticism and stereotyping. When we use Opportunity Mapping as a tool, we must use it wisely to lift up our state and its families while recognizing the accomplishments of residents of under-resourced communities. We must use the mapping to, in some cases, transcend assumptions about neighborhoods and, instead, base prescriptions for what a neighborhood needs on the hard numbers generated by the Opportunity Mapping analysis.

Much to its credit, the state of Connecticut adopted Opportunity Mapping among other steps to guide priorities for some of its housing programs. This report is intended to share updated analyses of this mapping with 2015 data and to document the extent to which housing subsidy programs have disproportionately placed subsidized housing in areas that already host the lion’s share of such housing. This has been true for the last several decades and even more recently.

We measure and map opportunity across Connecticut using three types of data: educational outcomes; economic indicators such as unemployment rates, job growth and rates of public

assistance; and neighborhood quality indicators such as vacancy rates, crime rates and rates of home ownership. From these data, each census tract in the state is rated as a “very high,” “high,” “moderate,” “low,” or “very low” opportunity area. In this report low and very low opportunity areas are frequently grouped and referred to as “lower opportunity areas.” In some cases, data is shared for lower and moderate opportunity areas combined to highlight trends. High and very high opportunity areas are referred to as “higher opportunity areas.”

New and definitive research by Raj Chetty, Nathaniel Hendren, and Lawrence Katz shows that children have significantly better life outcomes including an increased likelihood of attending college, being in a stable relationship, and earning greater incomes if they grow up in higher opportunity areas.¹ This research tells us that neighborhood matters. We must work to end segregation and provide families with choices in high-resource communities AND also ensure that all communities are transformed into higher opportunity areas.

OPPORTUNITY, RACE AND SEGREGATION IN CONNECTICUT

A deeper dive into opportunity mapping reveals:

- Only 2% of the land area of Connecticut is assessed as “very low opportunity,” the lowest of the five opportunity tiers.
- 30% of the land area is “very high opportunity” and 28% is “high opportunity.”
- The population of Connecticut is fairly evenly distributed among each of the 5 types of opportunity areas, even though the land area varies significantly – in other words, more people are concentrated in smaller, lower opportunity areas.
- 73% of Blacks and Latinos live in low and very low opportunity areas compared to 26% of Whites and 36% of Asians.
- Approximately half of Connecticut's Black and Latino residents live in the 2% of the land area of the state assessed as “very low opportunity” – i.e., those areas with the least access to critical levers that lead to success in life, such as thriving schools and safe neighborhoods. The same is true for only 9% of Whites.

New research tells us that neighborhood matters. We must work to end segregation and provide families choices in high-resource communities AND also ensure that all communities are transformed into higher opportunity areas.

¹ Chetty, R., Hendren, N., & Katz, L. (2016). The Effects of Exposure to Better Neighborhoods on Children: New Evidence from the Moving to Opportunity Experiment, American Economic Review 106(4), 855-902. Retrieved from http://www.equality-of-opportunity.org/assets/documents/mto_paper.pdf. (Hereinafter Chetty et al., 2016). This research focuses on neighborhood poverty rate as a proxy for opportunity.

Figure 1: Population by Opportunity and Race

Population by Opportunity and Race					
Opportunity Level	Very Low	Low	Moderate	High	Very High
% of CT Land Area	2%	17%	23%	28%	30%
Total Population	19%	18%	20%	19%	24%
Black Alone	52%	21%	13%	9%	5%
Latino	50%	22%	12%	8%	7%
White Alone	9%	17%	22%	23%	30%
Asian Alone	14%	21%	19%	20%	25%
Other	26%	22%	18%	18%	16%

HOUSING AND OPPORTUNITY

Overall, a stunning percentage of government subsidized units, typically upwards of 85%, are located in very low, low or moderate opportunity areas. For most programs, these numbers only become starker when considering housing that is not restricted to seniors (referred to as “unrestricted housing” in this report).

Figure 2: Location of Subsidized Units in Various Programs by Opportunity

Location of Subsidized Units in Various Programs by Opportunity	
PROGRAM OR DATA SOURCE ²	Percent of publicly-funded units/households in very low, low or moderate opportunity areas
Connecticut Housing Finance Authority Preservation List	87%
Low Income Housing Tax Credit	88%
State Sponsored Housing Portfolio Recapitalization <i>Eligible</i> Properties	76% (98% for “unrestricted” housing allowing families with children)
Competitive Housing Assistance for Multifamily Properties (CHAMP)	85%
TENANT-BASED SUBSIDIES	
Federal Housing Choice Voucher Program (Section 8)	86%
State Rental Assistance Program (RAP)	94%

- Over 75% of units in each housing program analyzed (listed above) are located in Connecticut’s lower opportunity areas - despite the fact that the general population is relatively evenly distributed between each of the 5 opportunity categories.
- For several programs, upwards of 45% of units are located in the very low opportunity areas that represent only 2% of the land area of the state.

² For more details on these programs, see Figure 9. The CHFA Preservation List is the most comprehensive list available of all government subsidized housing in Connecticut. It is incomplete in that it does not provide full information on funding levels, sources, bedroom counts and other details. It also does not include some types of subsidized units such as some supportive housing and Section 8 project-based units administered by town housing authorities.

- For most programs, less than 10% of government subsidies have supported affordable housing open to families in high and very high opportunity areas, even though these areas make up 58% of the land area of the state and are home to 40% of the population and the highest performing schools.
- Expenditures over recent years do not show a marked improvement in low-income families gaining access to thriving neighborhoods. The concentration of subsidized affordable housing in lower or moderate opportunity areas has persisted and, within some programs, become worse.
- Since the inception of the federal Low-Income Housing Tax Credit program 30 years ago, 88% of units in Connecticut have been developed in very low to moderate opportunity areas and only 12% in higher opportunity areas.

Since the inception of the federal Low-Income Housing Tax Credit program 30 years ago, 88% of units in Connecticut have been developed in very low to moderate opportunity areas and only 12% in higher opportunity areas.

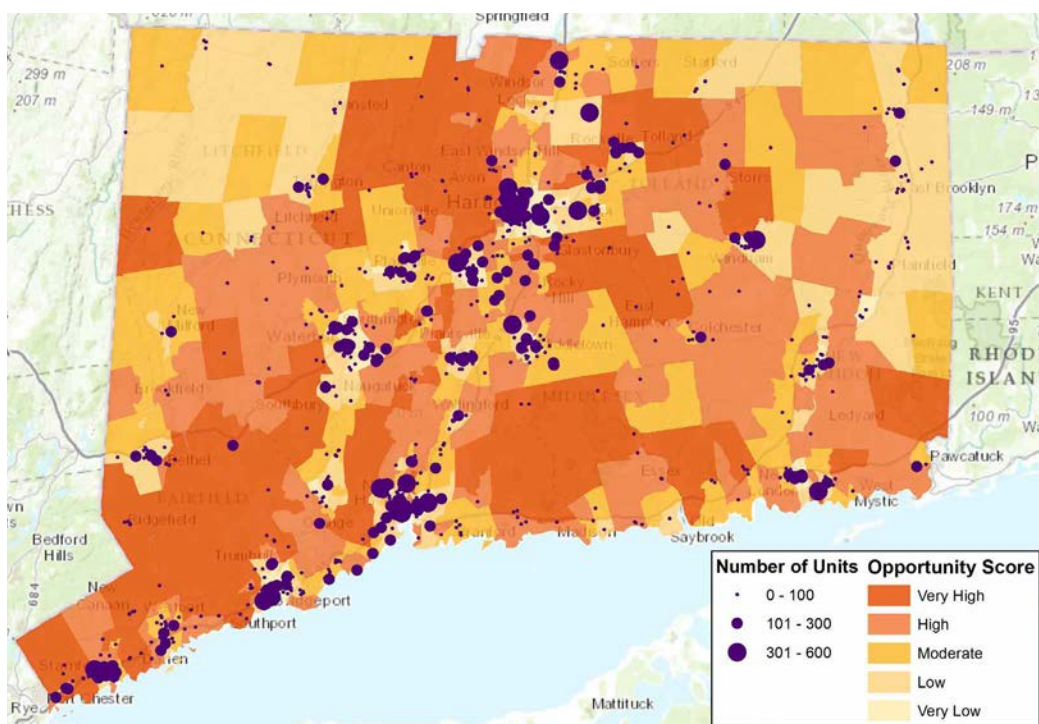


Figure 3: Connecticut Opportunity Map and Preservation Developments

A LONG-TERM PROBLEM IN CONNECTICUT

This out-of-balance development pattern generates poverty concentration in areas that are already struggling and limits housing choices for Black, Latino, single-parent (and especially female-headed) households, households with disabilities and other families who have a disproportionate need for affordable housing. In addition, deepening poverty concentration in high poverty areas creates potentially insurmountable barriers for communities working hard to promote revitalization and stability.

Many factors affect where subsidized housing is located and, apart from program priorities articulated through application processes, local zoning is the most significant. While zoning is a

state power,³ the state of Connecticut has delegated it to towns through the Zoning Enabling Act, Connecticut General Statute Sec. 8-2. This law requires, among other things, that towns permit the development of multifamily and affordable housing. Unfortunately, through various exclusionary zoning provisions, many towns effectively prevent such housing from being built. In fact, the zoning ordinances of 25 towns do not even permit multifamily housing to be built - a violation of the state statute.⁴ Such policies make the development of subsidized housing challenging or impossible in many higher opportunity towns.

There is a key nexus between local zoning and government housing subsidy programs. State government subsidy programs should offer both incentives and assists to towns and cities to promote the development of more affordable housing. First, we must ensure that government housing subsidy programs do not pose any additional barriers, beyond zoning restrictions, to locating a portion of subsidized housing in thriving communities. Second, the presence of strong incentives to locate subsidized housing in higher-resourced communities in and of itself increases the likelihood that exclusionary zoning practices will be overcome. A high likelihood of getting the subsidy will motivate developers to contend with zoning barriers - either through effective advocacy at the municipal level or through legal challenges, including with the state affordable housing appeals process under Connecticut General Statute Section 8-30g.⁵

Last, it is important to note that deeply affordable housing, that is, housing in reach for people who are truly living below the poverty line,⁶ is generally not developed in the absence of government housing subsidies.⁷ To ensure that such housing is available across regions in a balanced way, the administration of housing subsidy programs must promote geographic diversity.

POLICY RECOMMENDATIONS

Increase Access to Opportunity

1. **Balance housing investments to include higher opportunity areas through meaningful regional planning and the setting of specific, measurable goals.**
2. **Increase housing choice for tenant-based subsidy holders through mobility counseling.**
3. **Improve data collection and analysis of affordable housing characteristics and location.**

3 *Village of Euclid, Ohio v. Ambler Realty Co.*, 272 U.S. 365 (1926); see also McElroy, W. (1987). Playing the Numbers: Local Government Authority to Apply Use Quotas in Neighborhood Commercial Districts, *Ecology Law Quarterly* 14, 335.

4 Connecticut Department of Housing. (2015). *Analysis of Impediments to Fair Housing Choice 2015*, 113. Retrieved from http://www.ct.gov/doh/lib/doh/analysis_of_impediments_2015.pdf.

5 This has been true in New Jersey, see, Evans, T. (2017, May). *Assessment of the New Jersey Low Income Housing Tax Credit Program, New Jersey's Future*. Retrieved from <http://www.njfuture.org/wp-content/uploads/2017/05/New-Jersey-Future-Assessment-of-the-NJLIHTC-program.pdf>.

6 HUD defines "Extremely Low Income" as below the poverty line or 30% area median income, whichever is higher.

7 Leopold, J., Getsinger, L., Blumenthal, P., Abazajian, K., & Jordan, R. (2015, June). *The Housing Affordability Gap for Extremely Low-Income Renters in 2013*, 2. Washington, DC: Urban Institute. Retrieved from http://www.urban.org/research/publication/housing-affordability-gap-extremely-low-income-renters-2013/view/full_report. More than 80% of affordable housing for extremely low-income renters is HUD-assisted.

4. Increase rents under the Housing Choice Voucher and Rental Assistance Programs to reflect actual rents in all towns.
5. Expand housing authority jurisdiction beyond municipal borders.
6. Ensure affirmative marketing across racial lines for government-supported housing.
7. Fully fund fair housing testing and enforcement programs.
8. Address exclusionary zoning by adopting fair share housing goals.

Revitalize Struggling Communities

1. Continue and expand community revitalization investments to go beyond housing.
2. Implement policies that protect against involuntary displacement and ensure income diversity.
3. Make neighborhoods safer with high levels of community involvement.
4. Vigorously support schools, mentoring programs, after school activities, community colleges, scholarship programs, and job training opportunities.
5. Invest in resources that strengthen family and community connections.

WE CAN END SEGREGATION AND INCREASE OPPORTUNITY FOR ALL

Despite our aspirations and shared goals for fairness, the data in this report show that housing segregation persists in Connecticut and denies opportunities to children and families – and others in need of affordable options, such as single-parent families and households with a member with disabilities. By continuing to concentrate affordable housing in lower opportunity areas, we are replicating many of the conditions of poverty that limit the life chances of future generations. Repeating this pattern in moderate opportunity areas risks reproducing past housing policy practices that generated poverty concentration. Open Communities Alliance and many other advocates in Connecticut will continue to work with state leaders and public officials to achieve greater opportunities for all.

MAPPING OPPORTUNITY: AN OVERVIEW

To better understand Connecticut's opportunity gap, Open Communities Alliance has worked with other partners, such as the Connecticut Fair Housing Center and the Kirwan Institute, to map the availability of opportunity throughout the state.

Opportunity mapping is an analytical tool that deepens our understanding of "opportunity" dynamics within regions. The goal of opportunity mapping is to identify opportunity-rich and opportunity-isolated communities. With a basic understanding of the geography of opportunity, we can then better assess who has access to opportunity resources and develop strategies to remedy opportunity inequality. Through this Opportunity Mapping analysis, areas with an abundance of resources are identified as "higher opportunity areas." Areas that would benefit from additional resources are "lower opportunity areas."

The Connecticut Opportunity Mapping analysis uses 12 data points (below) to assess opportunity by census tract.⁸ These tracts are then grouped into one of five levels of opportunity: very low, low, moderate, high, and very high.

Figure 4: Data points used to develop the Opportunity Map of Connecticut

Data points used to develop the Opportunity Map of Connecticut		
Educational Indicators	Economic Indicators	Neighborhood/Housing Quality Indicators
Students Passing Math Test Scores (3rd grade)	Unemployment Rates	Neighborhood Vacancy
Students Passing Reading Test Scores (3rd grade)	% of Population on Public Assistance	Crime Rate (violent and property)
Educational Attainment	Job Growth	Neighborhood Poverty Rate
	Employment Access	Homeownership Rate
	Job Diversity	

⁸ Details on these data and the data sources are available in Appendix A.

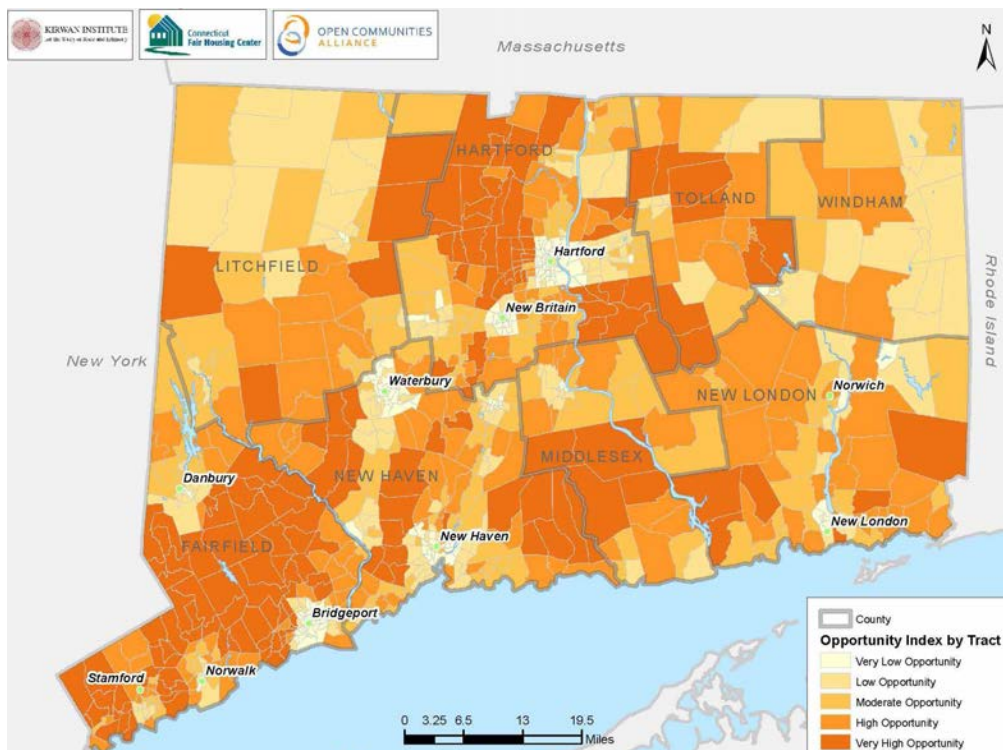


Figure 5: Opportunity Mapping in Connecticut

OPPORTUNITY, LAND AREA AND RACE/ETHNICITY

Very low opportunity areas represent only 2% of the land area of the state. Areas ranked as having “very high” or “high” levels of opportunity represent more than half (58%) of the land area of the state.

Land Area by Opportunity Level	
Opportunity Level	Land Area
Very High	30%
High	28%
Moderate	23%
Low	17%
Very Low	2%

Figure 6: Land Area by Opportunity Level

Analyzing the census data on race/ethnicity reveals a damaging pattern of segregation: 73% of Black and Latino residents in our state live in the two lowest opportunity areas (low and very low or, combined, “lower opportunity areas”). Only 26% of Whites and 36% of Asian residents live in lower opportunity areas. Conversely, very high opportunity areas represent 30% of the land area of the state but are home to only 5% of Black and 7% of Latino residents.

Figure 7: Percent Living in Lower Opportunity Areas

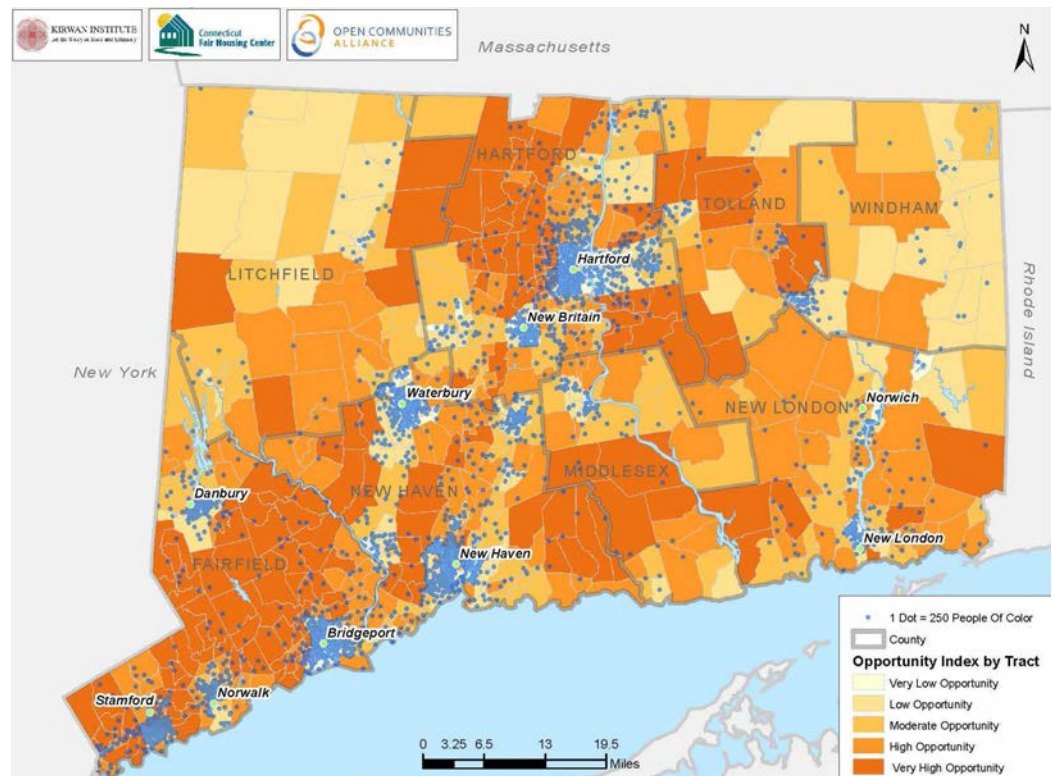
Percent Living in Lower Opportunity Areas	
% Land Area of CT	19%
Total Population	37%
Blacks	73%
Latinos	73%
White	26%
Asians	36%

Breaking these data down even further, approximately 50% of Blacks and Latinos in Connecticut live in just 2% of the land area of the state that is at the lowest opportunity level. This is true for just 9% of Whites.

Figure 8: Population by Opportunity and Race

Population by Opportunity and Race					
Opportunity Level	Very Low	Low	Moderate	High	Very High
% of CT Land Area	2%	17%	23%	28%	30%
Total Population	19%	18%	20%	19%	24%
Black Alone	52%	21%	13%	9%	5%
Latino	50%	22%	12%	8%	7%
White Alone	9%	17%	22%	23%	30%
Asian Alone	14%	21%	19%	20%	25%
Other	26%	22%	18%	18%	16%

Figure 9: Opportunity, Race, and Ethnicity





OPPORTUNITY & SUBSIDIZED HOUSING

Subsidized housing can be a critical tool for creating greater access to opportunity. Much has been written about the history of governments embracing housing policies that inevitably, and often intentionally, led to segregated housing patterns, including, most recently, Richard Rothstein's *The Color of Law: A Forgotten History of How Our Government Segregated America*.⁹ In Connecticut, we can do better.

Black and Latino residents, on average, earn half or less of what White residents earn in Connecticut,¹⁰ and therefore have a disproportionate need for affordable subsidized housing. Similar income disparities, and heightened need for affordable housing, exist for other groups such as people with disabilities, single-parent households, especially those that are female-headed, and people in need of supportive housing. For this reason, it is essential to look at where such housing is located and the forces that drive siting decisions.

Connecticut has a range of programs and funding sources that it can deploy to build, rehabilitate or offer incentives for the development of affordable housing. A strong state plan can use each of them to create a balanced landscape of affordable housing choices for families.

To better understand these programs, we provide an explanation of subsidized housing programs in use in Connecticut and place these programs in context.

Approximately 50% of Blacks and Latinos in Connecticut live in just 2% of the land area of the state that is at the lowest opportunity level. This is true for just 9% of Whites.

9 Rothstein, R. (2017). *The Color of Law: A Forgotten History of How Our Government Segregated America*. New York: Liveright Publishing Corporation; Rothstein, R. (2014, October 15). *The Making of Ferguson: Public Policies at the Root of its Troubles*. Retrieved from <http://www.epi.org/publication/making-ferguson/>; Massey, D. & Denton, N. (1993). *American Apartheid: Segregation and the Making of the Underclass*. Cambridge: Harvard University Press; Sharkey, P. (2013). *Stuck in Place: Urban Neighborhoods and the End of Progress toward Racial Equality*. Chicago: University of Chicago Press.

10 Connecticut Department of Housing. (2015). *Analysis of Impediments to Fair Housing Choice 2015*, 56. Retrieved from http://www.ct.gov/doh/lib/doh/analysis_of_impediments_2015.pdf.

EXPLANATION OF SUBSIDIZED HOUSING PROGRAMS

Figure 10: Government Subsidized Housing Programs in Connecticut¹¹

Program	Description	Funding Source	CT Funding Amount (5-year average)	Program Challenges
Tenant-Based Housing Choice Voucher Program (Tenant-Based Section 8)	<p>Provides rental assistance subsidies covering rent costs above 30-40% of low-income families' incomes, up to a cap.</p> <p>7,731 administered by the Department of Housing.¹²</p> <p>23,230 administered by municipal housing authorities.¹³</p>	Department of Housing and Urban Development (HUD)	\$330 million annually ¹⁴	<p>Segregation within the program.</p> <ul style="list-style-type: none"> • Maximum rents are too low to afford units in many areas. • Disincentives to local PHA encouraging mobility across town lines. • Inadequate information regarding available rental opportunities.
Project-Based Vouchers	<p>Provides subsidy contracts placing vouchers in existing multifamily developments.</p> <p>59 administered by the Department of Housing.¹⁵</p> <p>1,341 administered by municipal housing authorities.¹⁶</p>	HUD	\$15 million (estimate based on the per-household cost of the Tenant-Based Housing Choice Voucher Program)	A full analysis should be conducted, but it is likely that Project-Based Voucher subsidies are disproportionately located in lower opportunity areas.
Rental Assistance Program (RAP)	<p>Provides rental assistance subsidies, similar to the Housing Choice Voucher program, to supplement rent over 40% of eligible low-income program participants' incomes up to a cap.</p> <p>6,044 certificates in use.¹⁷</p>	CT Department of Housing (DOH)	\$42-54 million annually (2014-16) ¹⁸	Segregation within the program (see concerns for Sec. 8, except no issue with jurisdictional limitations).

11 The unit and household totals in this table may be more recent than those in the analyses that follow.

12 Department of Housing & Urban Development Tenant Characteristics Report. (n.d.). Retrieved August, 2017, from <https://www.hudexchange.info/grantees/>.

13 Id.

14 Email from HUD Hartford Field Office Director, Suzanne Piacentini, August 18, 2016.

15 Id.

16 Id.

17 Connecticut Department of Housing. (2016). Annual Report. Retrieved from <http://www.ct.gov/doh/cwp/view.asp?a=4513&q=530462>. Connecticut Department of Housing. (2015). Annual Report. Retrieved from <http://www.ct.gov/doh/cwp/view.asp?a=4513&q=530462>. Connecticut Department of Housing. (2014). Annual Report. Retrieved from <http://www.ct.gov/doh/cwp/view.asp?a=4513&q=530462>. (Hereinafter, collectively, DOH Annual Reports.)

18 Id.

Program	Description	Funding Source	CT Funding Amount (5-year average)	Program Challenges
Low Income Housing Tax Credit (LIHTC)	Largest federally funded affordable housing production and rehabilitation program in the country. Provides tax credits to owners or developers of properties with a percentage of units affordable to households at 50% AMI or below to offset federal tax liabilities or assign them to investors and use proceeds in the development or rehabilitation of affordable housing. 24,580 total units ¹⁹	U.S. Treasury via the Connecticut Housing Finance Authority (CHFA)	\$7-10 million annually (2013-16) ²⁰	Segregation within the program. <ul style="list-style-type: none"> 88% of units are outside of higher opportunity areas. Program competitive application points do not sufficiently incentivize higher opportunity development and do not set goals for use in all kinds of neighborhoods.
Competitive Housing for Affordable Multifamily Properties (CHAMP)	Designed to create and preserve affordable housing through grants, loan guarantees, and below-market interest rates loans. 4,430 total units ²¹	DOH <ul style="list-style-type: none"> Affordable Housing Program (Flex) Housing Trust Fund Program 	Flex: \$40-48 million per year (2014-16) HTF: \$10-27 million per year (2014-16) ²²	Segregation within program. Funding frequently linked to LIHTC funding, same issues apply.
State-Funded Public Housing (the State Sponsored Housing Portfolio represents a subset of this category)	State Funded Public Housing is an assortment of units that have historically involved state investment. The State Sponsored Housing Portfolio (SSHP) is a subset of this inventory. Some of the SSHP units were deemed eligible for a pool of funding intended to address capital improvements where such improvements will result in a sustainable and market-competitive development and/or the occupancy of off-line units serving a diversified economic population with incomes of up to 80% of Area Median Income. 14,665 total units ²³	DOH	\$30 million per year \$300 million in state bonding money pledged over 10 years ²⁴	Segregation within the program. Nearly 2/3 of capital improvement-eligible units are restricted to elderly; of the family units eligible for these funds, over 95% of units are in very low to moderate opportunity areas. Rehabilitation does not envision new units in higher opportunity areas.

19 Connecticut Housing Finance Authority. (2012). Preservation List. (With additions by OCA.)

20 Connecticut Housing Finance Authority. *LIHTC – 2016 Award List* – 9%. Retrieved from <http://www.chfa.org/Rental%20Housing/for%20Developers%20and%20Sponsors/Funding%20Initiatives/Tax%20Credit%20Programs/LIHTC%20Program.aspx>. Connecticut Housing Finance Authority. *LIHTC – 2015 Award List* – 9%. Retrieved from <http://www.chfa.org/Rental%20Housing/for%20Developers%20and%20Sponsors/Funding%20Initiatives/Tax%20Credit%20Programs/LIHTC%20Program.aspx>. Connecticut Housing Finance Authority. *LIHTC – 2014 Award List* – 9%. Retrieved from <http://www.chfa.org/Rental%20Housing/for%20Developers%20and%20Sponsors/Funding%20Initiatives/Tax%20Credit%20Programs/LIHTC%20Program.aspx>. Connecticut Housing Finance Authority. *LIHTC – 2013 Award List* – 9%. Retrieved from <http://www.chfa.org/Rental%20Housing/for%20Developers%20and%20Sponsors/Funding%20Initiatives/Tax%20Credit%20Programs/LIHTC%20Program.aspx>. (Hereinafter, LIHTC Award Lists.)

21 Connecticut Housing Finance Authority. (2012). Preservation List. (With additions by OCA.)

22 DOH Annual Reports, <http://www.ct.gov/doh/cwp/view.asp?a=4513&q=530462>.

23 Connecticut Housing Finance Authority. (2012). *Preservation List*.

24 DOH Annual Reports, <http://www.ct.gov/doh/cwp/view.asp?a=4513&q=530462>.

Program	Description	Funding Source	CT Funding Amount (5-year average)	Program Challenges
Federal Public Housing	Provides rental housing for eligible low-income families, the elderly, and persons with disabilities, in a variety of forms (from high-rise apartment buildings to scattered site single family housing). 14,805 total units ²⁵	Department of Housing and Urban Development (HUD)	\$153 million per year ²⁶	Segregation within the program. 84% of federally funded public housing is located in lower opportunity areas. Rehabilitation does not envision new units in higher opportunity areas.
Housing Tax Credit Contribution Program (HTCC)	Provides funding of up to \$500,000 to non-profit organizations for the development of affordable rental housing that benefits very low, low and moderate-income households. Total units not available.	CHFA	Up to \$10 million per year ²⁷	Limited information available about award grantees (such as location). In 2016, \$10 million was distributed to fund the development of 844 affordable units. Historical data not publicly available.
USDA Rural Affordable Housing	Variety of programs to build or improve housing and essential community facilities in rural areas, through loans, grants, and loan guarantees. 2,567 total units. ²⁸	Department of Agriculture (USDA)	\$141 million per year ²⁹	Limited information available.
State Supportive Housing	Combines new construction or rehabilitation of housing with support services and financing that facilitates deep-income targeting so that rent does not exceed 30% of residents' income. 5,614 units on Preservation List. This does not include many supportive housing units. ³⁰	DOH and others	\$36 million from DOH in FY 2016- 17 for construction/ preservation of supportive units (may not be representative of funding over time) ³¹	Limited information available; complex number of programs.

25 Department of Housing & Urban Development Tenant Characteristics Report. (n.d.). Retrieved August, 2017, from <https://www.hudexchange.info/grantees/>.

26 Email from HUD Hartford Field Office Director, Suzanne Piacentini, August 18, 2016.

27 Connecticut Housing Finance Authority. (n.d.). Tax Credit Programs – State Housing Tax Credit Contribution (HTCC) Program. Retrieved from <http://www.chfa.org/Rental%20Housing/for%20Developers%20and%20Sponsors/Funding%20Initiatives/Tax%20Credit%20Programs/HTCC%20Program.aspx>.

28 Connecticut Housing Finance Authority. (2012). *Preservation List*.

29 Email from USDA Rural Development Area Director Johan M. Strandson, August 24, 2016.

30 Connecticut Housing Finance Authority. (2012). *Preservation List*. (With additions by OCA.)

31 Email from CT Department of Housing CD Specialist Michael Santoro, August 23, 2016.

Program	Description	Funding Source	CT Funding Amount (5-year average)	Program Challenges
State Bonding Commission	In addition to recapitalization funding for the State Sponsored Housing Portfolio, the State Bonding Commission also supports a range of other housing development, which could be market-rate or subsidized. Total units created not available.	Bonding funds	Unclear	Unclear. No specific fair housing oversight.
Home Investment Partnership Program (HOME)	Provides grants to states and entitlement communities for activities that increase affordable homeownership and rental opportunities for low and very low-income people Total units created not readily available.	HUD	\$7.6 million annually (state) ³² \$4.3 million annually (6 entitlement jurisdictions) ³³	Segregation within the program. Lack of regional siting incentives or meaningful affirmatively furthering fair housing measures. In the Hartford area, 88% of rental properties are in areas that have 30% or more families living below poverty. 90% are in areas that have greater than 20% families living below poverty and have 50% or more minority population. ³⁴
Community Development Block Grant	Funds a range of improvements, from public infrastructure, such as sidewalks, to public housing rehabilitation. Can be used to rehabilitate housing. Total units not readily available.	HUD	\$12 million annually (Small Cities through the state) ³⁵ \$23.5 million annually (22 Entitlement jurisdictions) ³⁶	Not generally used to affirmatively further fair housing, despite the requirements of the program.

32 Connecticut Department of Housing. (2017-18). *Annual Action Plan for Housing and Community Development*. Retrieved from <http://www.ct.gov/doh/cwp/view.asp?a=4513&q=530462>. Connecticut Department of Housing. (2016). *Annual Action Plan for Housing and Community Development*. Retrieved from <http://www.ct.gov/doh/cwp/view.asp?a=4513&q=530462>. Connecticut Department of Housing. (2015). *Annual Action Plan for Housing and Community Development*. Retrieved from <http://www.ct.gov/doh/cwp/view.asp?a=4513&q=530462>. Connecticut Department of Housing. (2014). *Annual Action Plan for Housing and Community Development*. Retrieved from <http://www.ct.gov/doh/cwp/view.asp?a=4513&q=530462>. Connecticut Department of Housing. (2013). *Annual Action Plan for Housing and Community Development*. Retrieved from <http://www.ct.gov/doh/cwp/view.asp?a=4513&q=530462>. Connecticut Department of Housing. (2012). *Annual Action Plan for Housing and Community Development*. Retrieved from <http://www.ct.gov/doh/cwp/view.asp?a=4513&q=530462>. (Hereinafter DOH Annual Action Plans.)

33 Department of Housing and Urban Development. (2017). *HOME Activities Report – Connecticut – July 31, 2017*. Retrieved from https://www.hudexchange.info/programs/home/home-activities-reports/?filter_DateYearEach=2017-07-31&filter_State=CT&program=HOME&group=Act.

34 Gayles, E. & Mathema, S. (2014, September). *Is the HOME Program Affirmatively Furthering Fair Housing?*, Washington, D.C.:Poverty and Race Research Action Council. Retrieved from <http://prrac.org/pdf/HOME-AFFH.pdf>.

35 Department of Housing and Urban Development. (2017). *CDBG Grantee Expenditure Reports*. Retrieved from <https://www.hudexchange.info/programs/cdbg/cdbg-expenditure-reports/>.

36 Id.

SUBSIDIZED HOUSING IN CONTEXT

This report examines five sources of data to assess how subsidized housing placements interact with the geography of opportunity. These sources are listed in the text box to the right. These programs were chosen based on their impact on the subsidized housing market and the availability of data.

This analysis considers several sources for the location of subsidized housing units or tenants including:

1. *Connecticut Housing Finance Authority's Preservation List (2012)*
2. *Federal Low Income Housing Tax Credit Program (through 2017)*
3. *\$300 million State-Sponsored Housing Portfolio Revitalization Initiative (eligible portfolio through 2015)*
4. *Tenant-Based Programs (federal Housing Choice Voucher Program, 2009 data, and state Rental Assistance Program, 2012 data)*
5. *Competitive Housing Assistance for Multifamily Properties (CHAMP rounds 1-10; 2012-April 2017)*

Housing Subsidy Programs Matter

Housing subsidy programs matter a great deal. In some neighborhoods in Hartford, for example, 60% of the housing units were created or rehabilitated (or both) with housing subsidies. For some of the programs supporting this housing, maximum points in competitive application processes are awarded for properties remaining affordable for 50 years or more. Housing subsidy concentration like this can dictate the housing market in a neighborhood for generations, challenge neighborhood revitalization, concentrate poverty, and limit the benefits of a valuable government resource.

At the same time, subsidized housing is a crucial resource and many subsidized housing units in lower opportunity areas are in need of rehabilitation. Policymakers face challenging decisions about the efficacy of preserving existing housing in under-resourced neighborhoods versus investing housing dollars to create units in areas of opportunity. In some cases rehabilitation is best, especially if it can be done in the context of a neighborhood plan for revitalization that is accompanied by the investment of other valuable neighborhood resources or if it creates mixed income communities while avoiding involuntary displacement. Such an approach must be complemented by development in thriving communities. This is what is meant by a “balanced approach”: using state funds to revitalize lower and moderate opportunity neighborhoods and create meaningful housing access to high opportunity areas.

At the end of the day, subsidized housing is essential to assist low income households who depend on housing subsidies to help them through challenging parts of their lives, bridge the gap left by low wages, or survive over the long-term while contending with other barriers to independence, such as a variety of disabilities.

Program Incentives Matter

Housing subsidy programs can be designed to both generate units in higher opportunity areas and support revitalization in lower and moderate opportunity areas. In places such as New Jersey, where the Low Income Housing Tax Credit program (LIHTC) provides a separate competitive round for higher opportunity (in NJ's case, non-urban) placements, developers have incentives to obtain the land and zoning approvals necessary to get the units built. Likewise, subsidized housing can use application incentives to spur applications that spark revitalization, especially if they can be paired with other revitalizing resources. In New Jersey's LIHTC program, a portion of the credits programs' points is also awarded for revitalization efforts. Connecticut has made some initial steps to create a more balanced playing field for higher opportunity

development within some programs, but more needs to be done to ensure that the message is clear to developers that there is a commitment to a variety of geographical subsidized housing locations.

In most cases, for every unit created in a higher opportunity area, a unit becomes available in a lower opportunity area, so further housing investments there are not always needed. However, non-housing investments that can help revitalize neighborhoods are essential.

Zoning Matters

Zoning acts as a considerable barrier to locating subsidized and affordable housing in higher opportunity communities. In fact, subsidized housing faces a double barrier – program incentives that discourage developers from applying for higher opportunity locations and exclusionary zoning. Higher opportunity area-promoting program points for a percentage of the subsidized program resources act as an incentive for developers to take the necessary steps to advance a project through a town’s political process or to fight for approval through the state’s Affordable Housing Appeals Act or other remedies, if necessary.

To address exclusionary zoning, Open Communities Alliance recommends a more meaningful state role in zoning oversight and the adoption of a series of targeted incentives and disincentives to encourage all towns in Connecticut to take on a “fair share” of affordable housing considering town geography and resources. Such measures could build on existing policies such as the Affordable Housing Appeals Act and the Incentive Housing Zones program and employ effective strategies used elsewhere in the country, such as carefully targeted inclusionary zoning provisions.

As is clear from the data analyzed in this report, the current practices are not functioning to increase access to opportunity or revitalize struggling communities without involuntary displacement. It is time for bold new approaches to transform the Connecticut landscape into thriving regions with open communities.

DATA ANALYSES

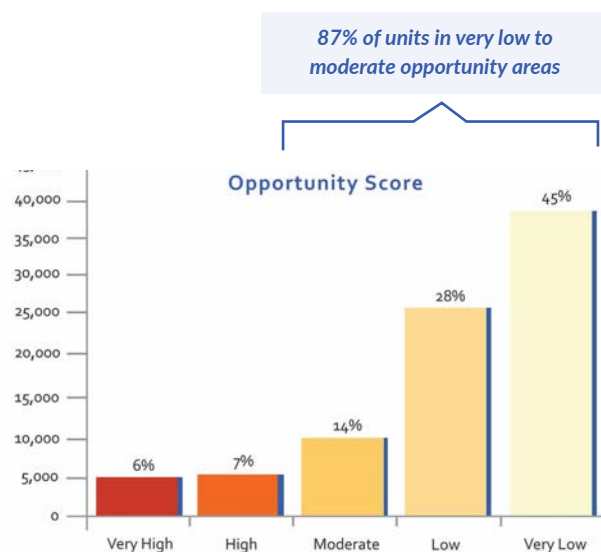
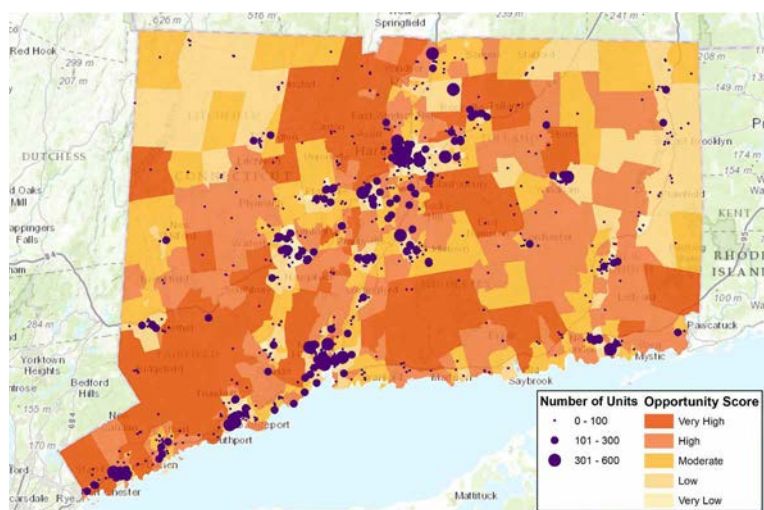
Forty-five percent of units on the Preservation List are located in very low opportunity areas that comprise only 2% of the land area of the state.

1. THE PRESERVATION LIST

The Preservation List is the most comprehensive list of subsidized housing units available in Connecticut. It was compiled by the Connecticut Housing Finance Authority (CHFA) as part of an effort to determine when certain government-funded developments would “time out,” or end their obligation to remain affordable. This list was last obtained from CHFA in 2012. It is analyzed here with data only through 2012, though Open Communities Alliance has endeavored to update it on an ongoing basis. More recent data based on these updates are analyzed separately.

The Preservation List is imperfect – in addition to not being updated by the state on an ongoing basis, it does not include some subsidized housing units. However, it remains the most comprehensive list of the state and federal governments’ investments in subsidized housing in Connecticut. The list includes approximately 83,000 units of housing.

Figure 11: Preservation List Units (through 2012)



What's missing from the Preservation List?

The Preservation List is only a partial list of subsidized housing in Connecticut and, while it includes over 83,000 units, information on those units is incomplete. The list appears to be missing many of a large number of supportive housing units and Project-Based Voucher units overseen by housing authorities other than the Department of Housing (DOH), and it does not include the locations of tenant-based Housing Choice Vouchers. Additionally, it does not include complete information on bedroom sizes, affordability levels, cost per unit, and other data essential to comprehensive regional and housing planning. It is not updated on an ongoing basis.

Eighty-seven percent of subsidized units included on the Preservation List are located in very low, low or moderate opportunity areas – those more likely to have higher rates of crime and under-performing schools – or, in the case of moderate opportunity areas, places that are often home to solid opportunity structures but are struggling to maintain them. Seventy-three percent of the units are located in lower opportunity areas, while forty-five percent of units are located in very low opportunity areas that comprise only 2% of the land area of the state.

Interestingly, of the portfolio listed on the Preservation List, there is a significant difference between the location of unrestricted and age-restricted units (senior housing) by opportunity area. Only 2% of Preservation List units are located in very high opportunity areas and are available to all households, without age restrictions. This is significant considering how critical resources like thriving schools and safe neighborhoods are, particularly for young children.

Only 2% of Preservation List units are available to all households without age restrictions and located in very high opportunity areas.

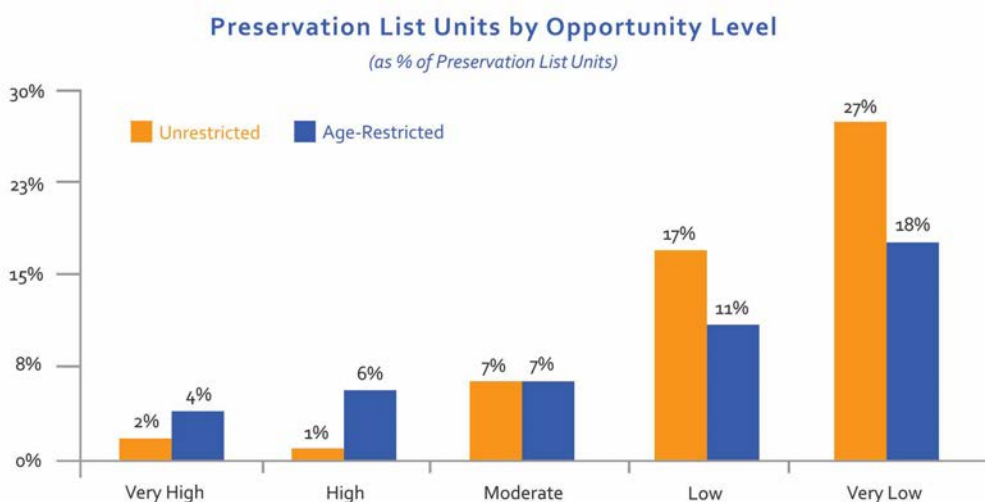


Figure 12: Preservation List Units by Opportunity Level

Further Analyzing the Preservation List

Federal and state public housing units vary greatly in their distribution across opportunity levels. This is likely due to the fact that state public housing was originally built primarily for veterans,¹ and therefore was more broadly accepted in suburban and rural neighborhoods. For example, 26% of state public housing is located in moderate opportunity areas compared to only 7% of federally-funded public housing. Fifty-two percent of state public housing does not permit families with children.

Figure 13: Federal Public Housing

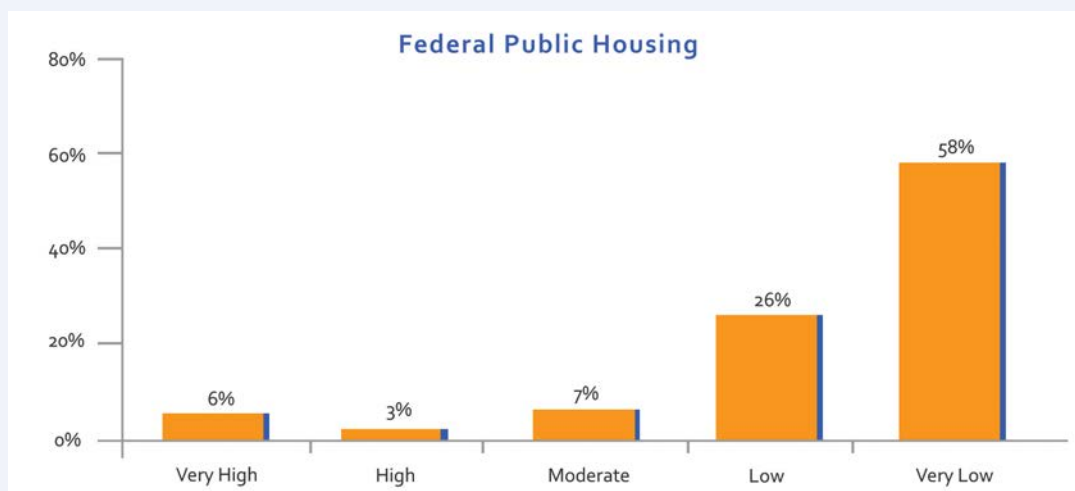
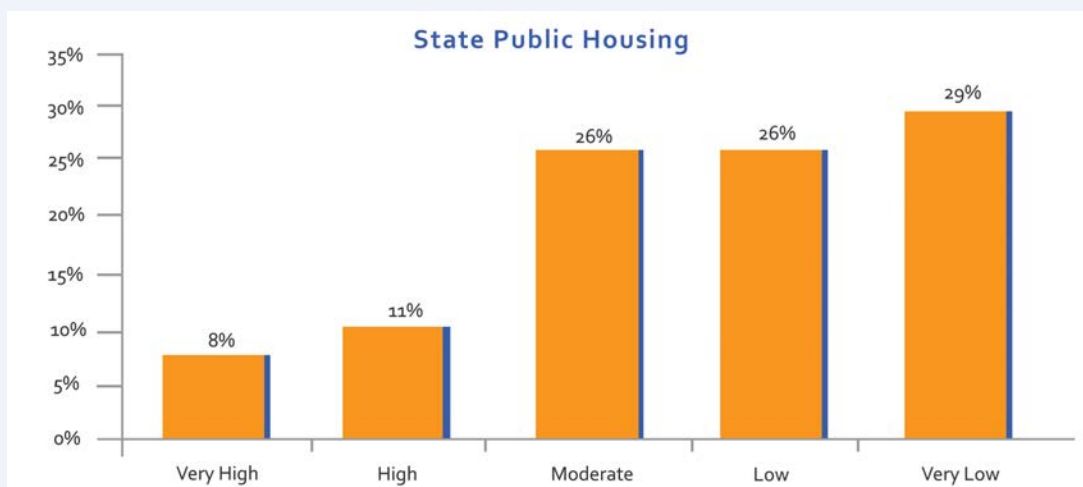


Figure 14: State Public Housing



¹ Note: For more on the history of state-supported public housing, see Albert, N. (2003). A Tale of Two Cities: The Rise & Fall of Public Housing. *Connecticut Explored*. Retrieved from <http://ctexplored.org/a-tale-of-two-cities-the-rise-fall-of-public-housing/>.

Further Analyzing the Preservation List (cont.)

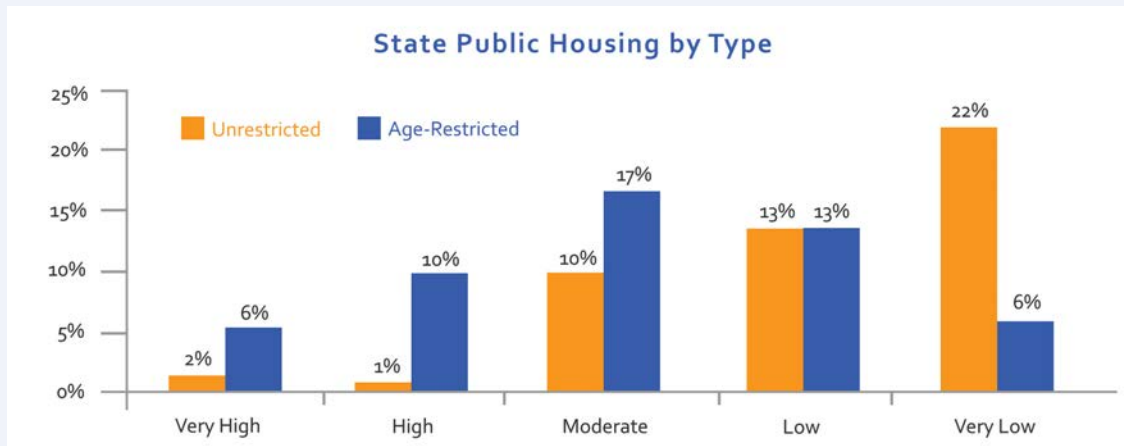


Figure 15: State Public Housing by Type

Supportive housing is a strategy to address chronic homelessness. It recognizes that some people experiencing homelessness need additional services to remain in stable housing. These services may include specialized assistance for people with certain disabilities, social work case management, life skills training and more. Based on Preservation List data, 91% of supportive housing is located in very low to moderate opportunity areas.

It should be noted, however, that the Preservation list is likely missing supportive housing units overseen by the Department of Mental Health and Addiction Services. This highlights the need for more comprehensive subsidized housing data.

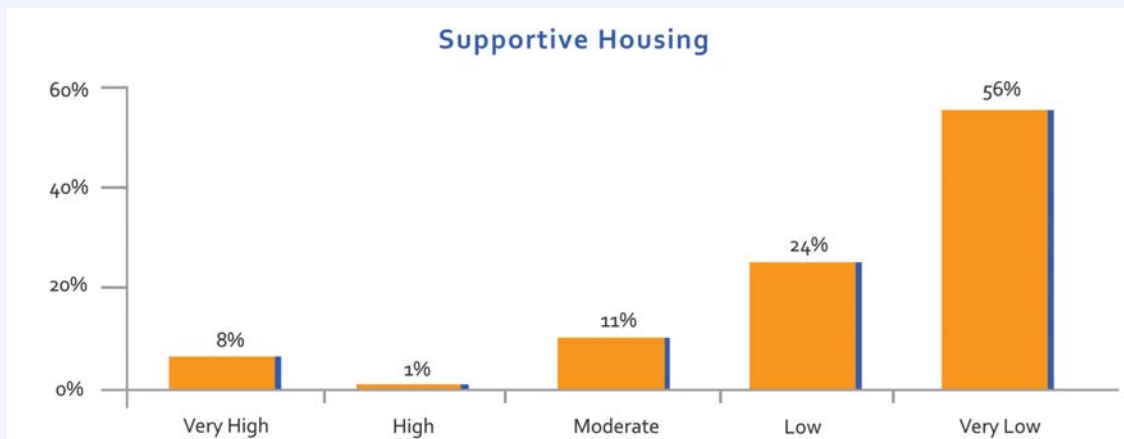


Figure 16: Supportive Housing

2. THE LOW INCOME HOUSING TAX CREDIT PROGRAM

The Low Income Housing Tax Credit (LIHTC) program supports the development, purchase, and rehabilitation of rental housing projects that include a percentage of units affordable to low-income individuals and families at 50% of Area Median Income or below. The program produces and rehabilitates more units of affordable housing than any other federal program in the country. The LIHTC program is run by the federal Department of Treasury and administered in Connecticut by the Connecticut Housing Finance Authority (CHFA). Through this program, federal tax credits are made available to developers who build affordable housing. Since the program began in 1987, it has created approximately 24,580 units in Connecticut, over two-thirds of which are allocated for unrestricted housing (i.e. permit all households, including families with children).

LIHTC Data Sources

The data used for the analysis of LIHTC unit locations are a combination of data provided by the Connecticut Housing Finance Authority in 2012 and additional program allocations compiled by Open Communities Alliance since that time.

This analysis considers all units in LIHTC units, not just those that are targeted as below market rate. It does not include data on the percentage of LIHTC market rate units occupied by residents using other subsidies such as the Housing Choice Voucher program, which is likely to be quite high, especially in lower opportunity areas. These additional data points would be important to collect for a fuller analysis.

Restricted v. Unrestricted LIHTC Units

Figure 17: All LIHTC Unit by Type

All LIHTC Units by Type ³⁷		
Housing Type	Unrestricted	Age-Restricted
Overall Percent	68%	24%

Since the inception of the program 30 years ago, in Connecticut only 12% of LIHTC units have been created in higher opportunity areas.

Sixty-eight percent of LIHTC units are unrestricted. This is good news because housing that is not restricted better enables the state to meet housing needs as populations fluctuate. A policy focusing primarily on unrestricted housing also limits higher opportunity communities from avoiding taking on a fair share of subsidized housing open to families with children.

³⁷ The percentages total less than 100% because some other specialized housing types are excluded.

LIHTC and Access to Opportunity

Unfortunately, an opportunity analysis of the LIHTC program reveals that this critical housing creation tool is deployed overwhelmingly and disproportionately in lower opportunity areas.

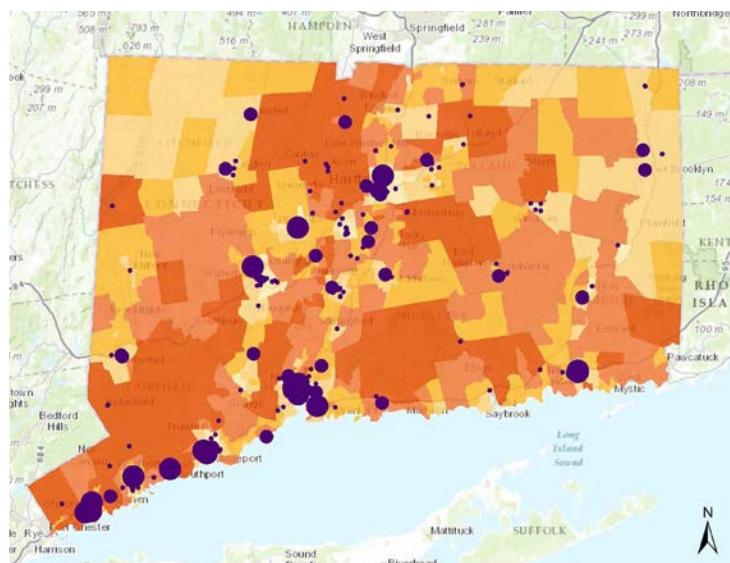
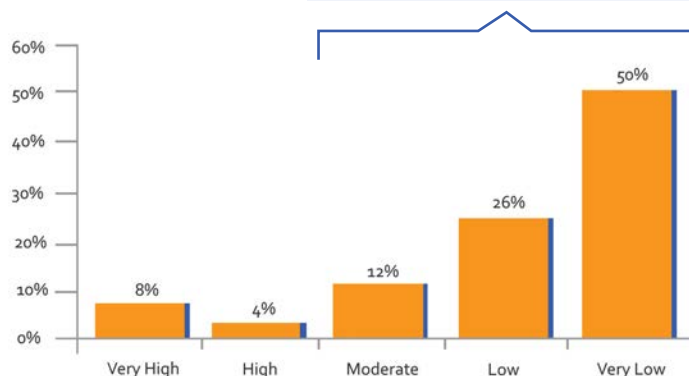


Figure 18: Low Income Housing Tax Credit Units, 1987-2017

88% of LIHTC units are located in very low to moderate opportunity areas.



Since the inception of the program in Connecticut in 1987, only 12% of LIHTC units have been created in higher opportunity areas. This development pattern generates poverty concentration in areas that are already struggling and limits housing choice for Black, Latino, single-parent, households with disabilities and other families who have a disproportionate need for affordable housing.

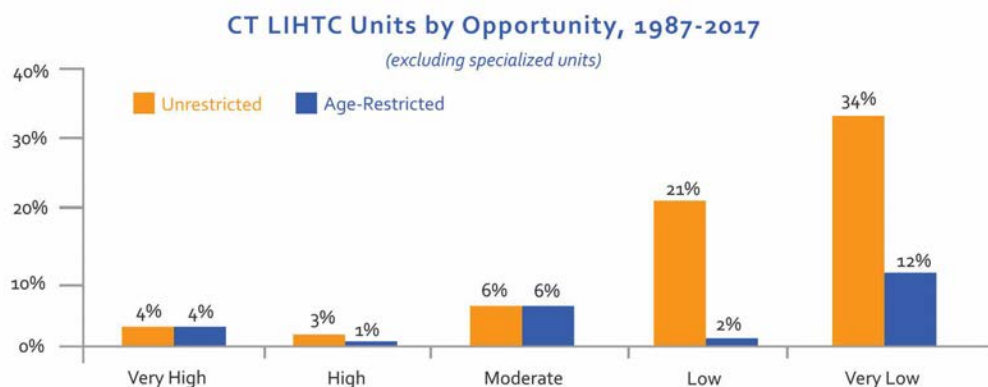


Figure 19: CT LIHTC Units by Opportunity, 1987-2017

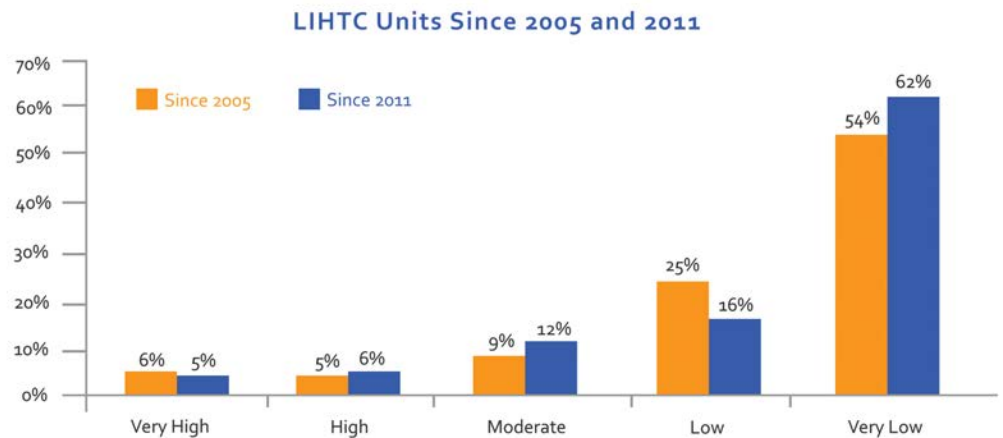
When considering unrestricted versus restricted housing, the pattern is even starker. Only 7% of LIHTC units are unrestricted (open to all, including families) and located in high or very high opportunity communities.³⁸

³⁸ Note that "other" units, such as specialized supportive housing, are not included.

Recent Performance

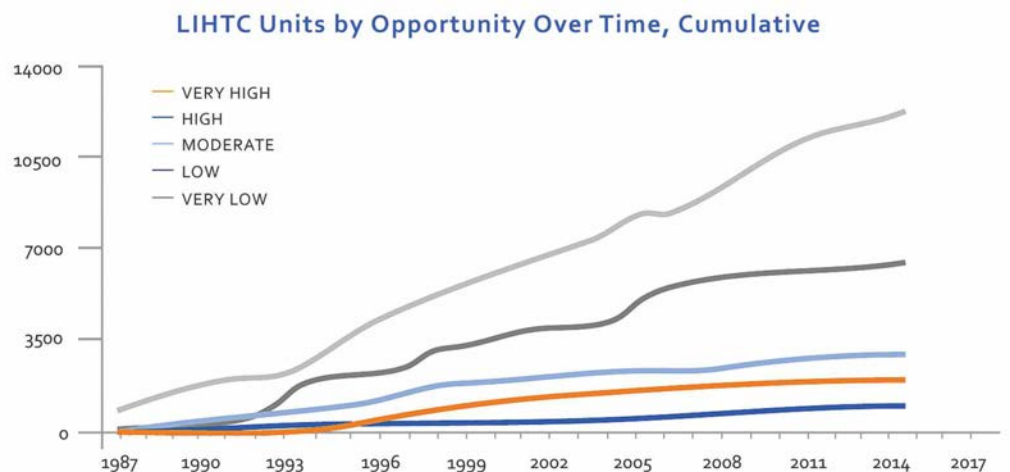
The LIHTC program does not have a better record of supporting the development of affordable housing in higher opportunity areas in recent years. Since 2005, as in the past, 88% of LIHTC units have been funded in very low to moderate opportunity areas. Fifty-four percent have been allocated to very low opportunity areas, which comprise only 2% of land area of the state. Since 2011, the percentage has only increased, with 90% of LIHTC units built in very low to moderate opportunity areas and a significant increase in the percent (62% v. 54%) being built in very low opportunity areas as compared to the post-2005 period.

Figure 20: LIHTC Units Since 2005 and 2011



The cumulative impact of this type of housing policy is clear from Figure 21 – deep concentration of subsidized housing in areas that already host poverty concentration, have the bulk of the state’s affordable housing, and enjoy fewer overall resources.

Figure 21: LIHTC Units by Opportunity Over Time, Cumulative



Subsidized Housing: Revitalization vs. High Opportunity Development

Nationally, there is not consensus within the affordable housing development community on the most appropriate use of the LIHTC program. The disagreements center around whether the program can revitalize neighborhoods or is better used to generate access to higher opportunity areas for low-income families and individuals. Ideally, the program would accomplish both goals. While more research remains to be done, current analyses do not support the conclusion that concentrating LIHTC in distressed neighborhoods is, by itself, a reliable strategy for revitalization, especially when considering school performance, employment access, and a broader array of opportunity factors. On the other hand, in terms of creating access to opportunity for low-income children belonging to groups that have historically been opportunity-isolated, encouraging affordable housing development in thriving communities has been demonstrated to be a highly effective strategy. A portion of the LIHTC program can also be used to assist struggling communities, but that will likely be most effective if housing development is undertaken in coordination with other local revitalizing efforts and does not increase poverty concentration. Apart from these kinds of housing investments, ongoing and enhanced non-housing economic development expenditures are critical to assisting struggling communities.

Research provides a roadmap that can guide housing policy going forward. This research finds:

Thriving Neighborhoods Help Children

- Children, and especially young children, develop better in environments with reduced stress-triggers, such as exposure to violence and crime.¹
- Low-income children who move with their families from high poverty to mixed income areas will earn more as adults, attend higher quality colleges, and are more likely to be in stable relationships.²
- The younger a low income child is when he or she gains access to mixed income communities, the greater positive impact the change in environmental conditions will have on him or her.³

1 Sharkey, P. (2013). *Stuck in Place: Urban Neighborhoods and the End of Progress toward Racial Equality*. Chicago: University of Chicago Press. 150–51.

2 Chetty et al., 2016.

3 Chetty, R. & Hendren, N. (2017, May). The Impact of Neighborhoods on Intergenerational Mobility I: Childhood Exposure Effects. *National Bureau of Economic Research*. Retrieved from http://www.equality-of-opportunity.org/assets/documents/movers_paper1.pdf.

LIHTC Alone May Not Help Distressed Neighborhoods

- Existing studies provide a mix of conclusions, but most point to marginal or no increase in property values in distressed neighborhoods when LIHTC developments are constructed.⁴
- The majority of studies find that neighborhood incomes in distressed areas do not increase and, in some studies, decrease, when LIHTC units are built.⁵
- Three studies have found that new LIHTC developments in distressed communities decrease crime levels, but it is not clear how this reduction differs from reductions due to other kinds of non-housing investment.⁶
- The limited research conducted thus far does not explore or indicate any impact – positive or negative – of LIHTC developments on local public schools.⁷

Non-Concentrated Affordable Housing is Best Placed in Thriving Neighborhoods

- Areas with appreciating home values continue to experience upward property value trends after the development of non-concentrated affordable housing.⁸
- Development of non-concentrated affordable housing does not generate increased crime in thriving neighborhoods.⁹

4 Dillman, K., Horn, K., & Verrilli, A. (2017). The What, Where, and When of Place-Based Housing Policy's Neighborhood Effects. *Housing Policy Debate* 27(2). 287.

5 Id. One exception to this is Diamond, R., & McQuade, T. (2015). *Who wants affordable housing in their backyard? An equilibrium analysis of low income property development*. Stanford:Stanford University. Retrieved from http://web.stanford.edu/~diamondr/LIHTC_spillovers.pdf. Because this study is contradicted by other research, uses a "fuzzy match" analytical approach according to Dillman, Horn, and Verrilli, and employs a narrow 1/10 mile (528 feet) definition of "neighborhood," OCA urges caution when incorporating its findings into policy formulation.

6 Id.

7 Id.

8 Galster, G., Tatian, P., & Smith, R. (1999). The Impact of Neighbors Who Use Section 8 Certificates on Property Values, *Housing Policy Debate*, 10(4). 910. Retrieved from https://www.researchgate.net/profile/George_Galster2.

9 Dillman, Horn, and Verrilli (2017) at 288.

Case Study: LIHTC in Hartford's Frog Hollow Neighborhood

The LIHTC program began in 1987. Since then, 770 LIHTC units have been built or rehabilitated in the Frog Hollow neighborhood of Hartford, Connecticut, which has an area of 1.27 square miles. Such concentrated use of LIHTCs is often justified as a means to revitalize neighborhoods, so it is worth considering whether neighborhoods with deep housing subsidy investments have experienced the anticipated improvements.

This type of analysis is challenging because there are many ways to assess neighborhood change (e.g., poverty, job creation, median income, school performance, and homeownership rates, to name just a few) and a range of variables in addition to subsidized housing concentration that might affect neighborhood conditions (e.g., an economic recession or an infusion of economic development dollars). Still, it is worthwhile exploring the Frog Hollow experience to understand better the role of housing subsidies.

The Frog Hollow neighborhood has a poverty rate of 51% and is 93% people of color. According to Open Communities Alliance's analysis of the best available data, at least 61% of its housing stock was created or preserved through government subsidies. Despite these challenges, Frog Hollow has many attributes. It is the heart of the region's Puerto Rican and Latino community and home to strong institutions like Hartford and Children's Hospital, Trinity College, Billings Forge restaurant and community center, and the Learning Corridor collection of magnet schools.

From 1980 to 2015, the period just prior to and during the investment in 770 LIHTC units in the neighborhood, the poverty rate increased from 37% to 50%. While historical school information is difficult to analyze, from 2010 to 2013 the two elementary schools located in Frog Hollow, Sanchez and Burns Schools, have had static Great Schools ratings of 2 out of 10 and 1 out of 10, respectively.¹⁰ It is hard to know all of the factors that spurred these poverty increases and educational outcomes, but it is safe to conclude that the presence of LIHTC developments on its own did not lower the poverty rate and revitalize the neighborhood.

A number of questions remain – What would the poverty rate in Frog Hollow be if the LIHTC units had not been added? What if more non-housing investments had been made (and some were)? How would the lives of families occupying these developments be different if they had lived in higher opportunity areas? What would the social service cost savings have been to the state? What would the municipal and state tax revenue impact be down the road if the children growing up in Frog Hollow had instead grown up in neighborhoods with fully-resourced schools, using Raj Chetty's calculation of an increase in lifetime earnings of \$302,000?

Looking at the impact of LIHTC development in a non-poverty concentrated area is one way to begin to answer some of these questions. During the same period, from 1980 to 2015, 194 LIHTC units were created in Farmington, Connecticut, a higher opportunity town of 28 square miles. Ninety-two percent of Farmington's residents are either White/non-Latino or Asian. During the period that LIHTC units were created, the poverty rate in Farmington fluctuated between 1% and 3%, basically changing in line with the variations at the state level, although the state's percentage was significantly higher, ranging between 8%

10 See Great Schools school ranking search engine, available at <https://www.greatschools.org/connecticut/hartford/schools/?gradeLevels=e>.

and 10%. All Farmington public schools were ranked 9 out of 10 or 10 out of 10 by Great Schools between 2010 and 2013. It appears that the development of affordable housing in the thriving town of Farmington had no discernable impact on the town's poverty rate.

Clearly the comparison is imperfect. While 197 LIHTC units were created in Farmington (28 sq./miles) from 1987 to 2015, 3,501 were generated in Hartford (18 sq./miles). The experience of Frog Hollow is just one of many, but it is important to note that the overall poverty rate in Hartford has also outpaced the state's during this period, increasing from 25% in 1980 to 37% in 2015.

The findings of this case study are consistent with research findings in the field – affordable and subsidized housing creates the least neighborhood impact and generates the most significant positive outcomes for residents when it is located in thriving, high opportunity communities.¹¹

That said, this area is ripe for further research and it is worth determining whether there are instances where LIHTC developments have contributed to revitalization in struggling communities and produced better outcomes for residents.

Figure 22:
Poverty Rate
Since 1980

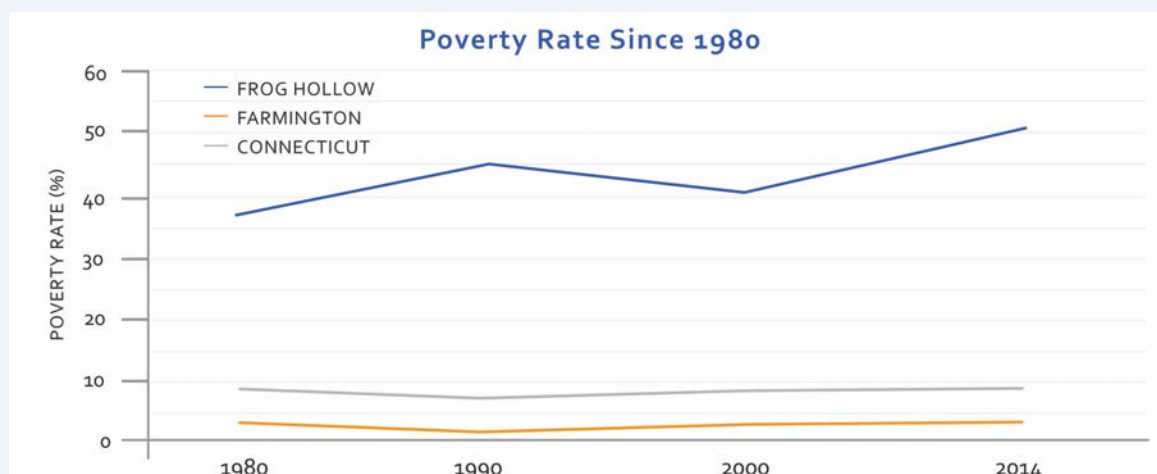
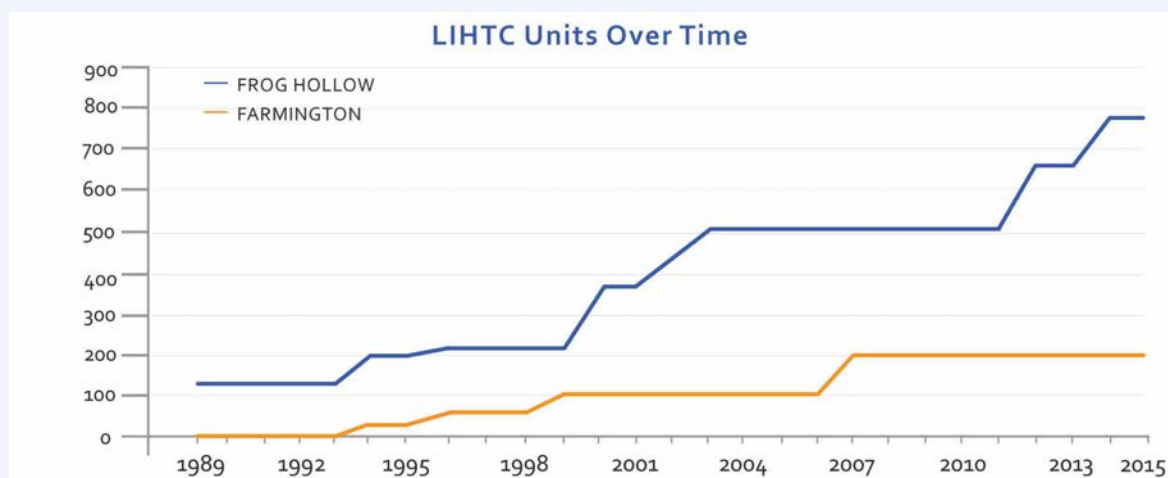


Figure 23: LIHTC
Units Over Time



11 Albright, L., Derickson, E.S. and Massey, D.S. (2013). Do Affordable Housing Projects Harm Suburban Communities? Crime, Property Values, and Taxes in Mount Laurel, NJ. *City & Community*, 12(2).

3. STATE-SPONSORED HOUSING PORTFOLIO REVITALIZATION INITIATIVE

In 2012, the Department of Housing identified 281 properties in the state-sponsored housing portfolio (SSHP) that would be eligible for recapitalization funding. The SSHP inventory is a sub-category of the State Funded Public Housing, an assortment of units that have historically involved state investment.

Illustrating a perennial challenge faced by the affordable housing community, the vast majority of the eligible portfolio units are located in low or very low opportunity areas. The fact that nearly two-thirds of the eligible housing is restricted to senior housing presents further policy challenges. Fortunately, only 16% of the eligible units are in very low opportunity areas.

Overall, only 2% of the eligible State Supported Housing Portfolio units are in higher opportunity areas and are available to families with children.

Eligible State Portfolio Units by Type		
Type of Housing	Unrestricted	Age-Restricted
Overall Percent	35%	65%

Figure 24: Eligible State Portfolio Units by Type

Eligible State Portfolio Units by Opportunity		
Opportunity Level	Unrestricted	Age-Restricted
Very High	1%	9%
High	1%	13%
Moderate	10%	18%
Low	14%	18%
Very Low	9%	7%

Figure 25: Eligible State Portfolio Units by Opportunity

Overall, only 2% of the eligible portfolio units are in higher opportunity areas and are unrestricted (i.e., available for families with children). The first allocations of state funding for rehabilitation of these properties under this initiative, issued in October, 2016, reveals that no developments were funded in higher opportunity areas and the bulk of units funded were in moderate opportunity areas (Figure 26).

October 2016 State Portfolio Units by Opportunity		
Opportunity Level	Unrestricted	Age-Restricted
Very High	0%	0%
High	0%	0%
Moderate	30%	28%
Low	24%	5%
Very Low	13%	0%

Figure 26: October 2016 State Portfolio Units by Opportunity

These data highlight the policy questions raised throughout this report: How many government resources should be used to rehabilitate or preserve housing in lower opportunity areas versus

creating new housing in higher opportunity areas? What is the cost-benefit calculus considering the true costs of living in a lower opportunity area for families who would prefer an alternative choice? What do we do with moderate opportunity housing? What about families who would like to stay in lower opportunity areas? Could some elderly units be made available to families? What is the real need for different types of housing, based on empirical evidence?

4. RENTAL ASSISTANCE & HOUSING CHOICE VOUCHER (SECTION 8) PROGRAMS

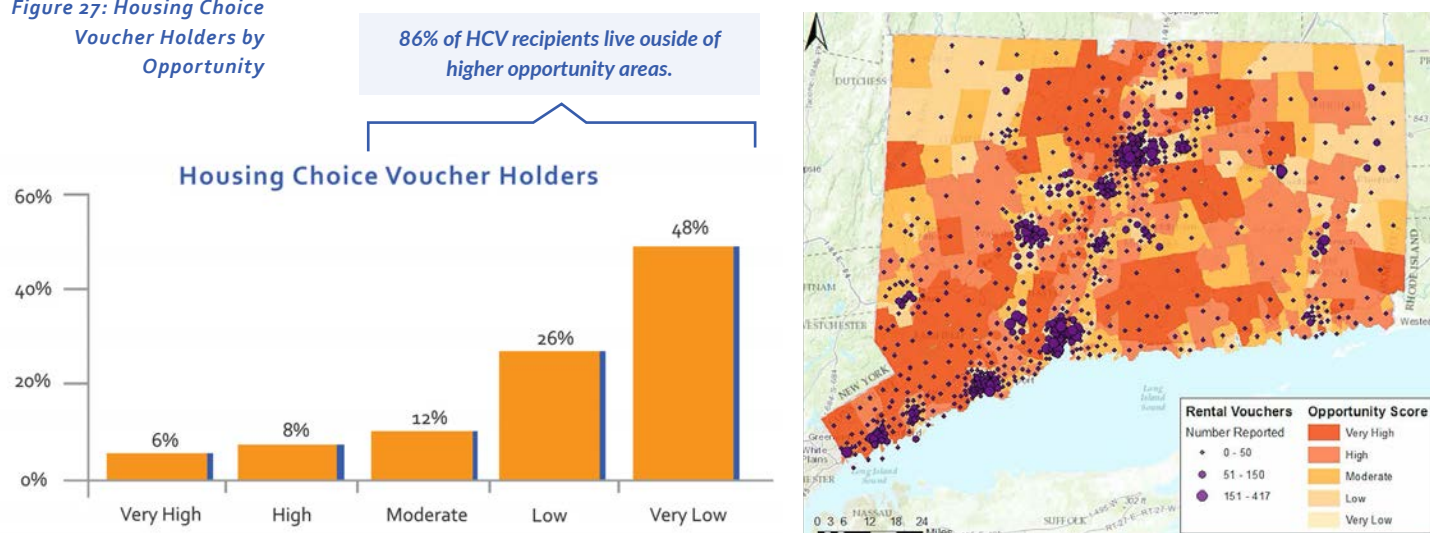
Both the Rental Assistance Program (RAP) and the Tenant-Based Housing Choice Voucher Program (tenant-based HCV) provide government vouchers for low-income families and individuals that cover the portion of the rent in private market units above 30-40% of the tenant's income. Both programs are exceptionally segregated by race. This is due to a range of factors including federal program incentives, program rent levels, state-defined housing authority jurisdictions, the location of affordable units, the location of housing on the lists distributed to voucher holders, and the lack of more comprehensive information and counseling on the full range of housing choices.

There are 30,933 tenant-based Housing Choice Vouchers³⁹ in use in Connecticut, and 6,044 Rental Assistance vouchers.⁴⁰ Voucher holders are overwhelmingly people of color and live disproportionately in high poverty areas.

Tenant-Based Housing Choice Voucher (HCV) Program

Eighty-six percent of tenant-based HCV holders live in very low to moderate opportunity areas; only 14% are in high or very high opportunity areas. 78% of HCV holders are people of color.⁴¹

Figure 27: Housing Choice Voucher Holders by Opportunity



39 Department of Housing & Urban Development Tenant Characteristics Report. (n.d.). Retrieved August, 2017, from <https://www.hudexchange.info/grantees/>.

40 DOH Annual Reports, <http://www.ct.gov/doh/cwp/view.asp?a=4513&q=530462>. The data analyzed here reflects only 3,182 RAP recipient addresses as of December 12, 2012.

41 Analysis of Impediments to Fair Housing Choice 2015, at 153.

State Rental Assistance Program (RAP)

The analysis of the Rental Assistance Program yields similar outcomes: RAP program participants are disproportionately people of color, with 75% of program participants being non-White. Ninety-four percent of voucher holders live in very low to moderate opportunity areas that are racially segregated and high poverty.

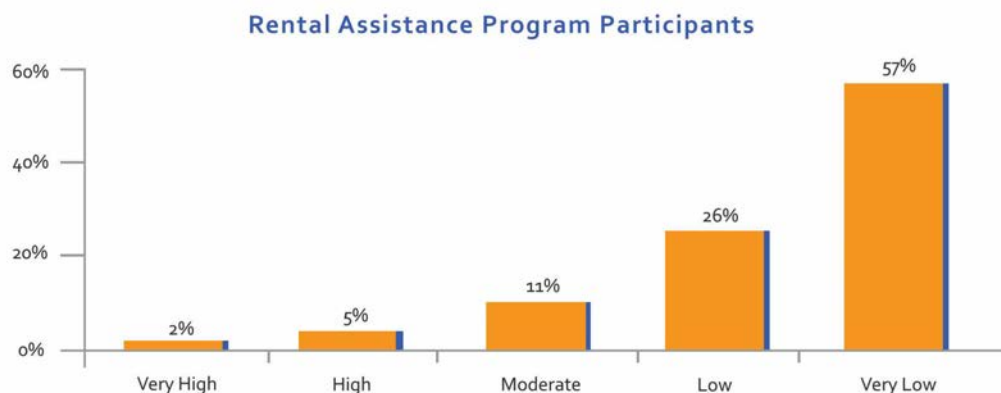


Figure 28: Rental Assistance Program Participants

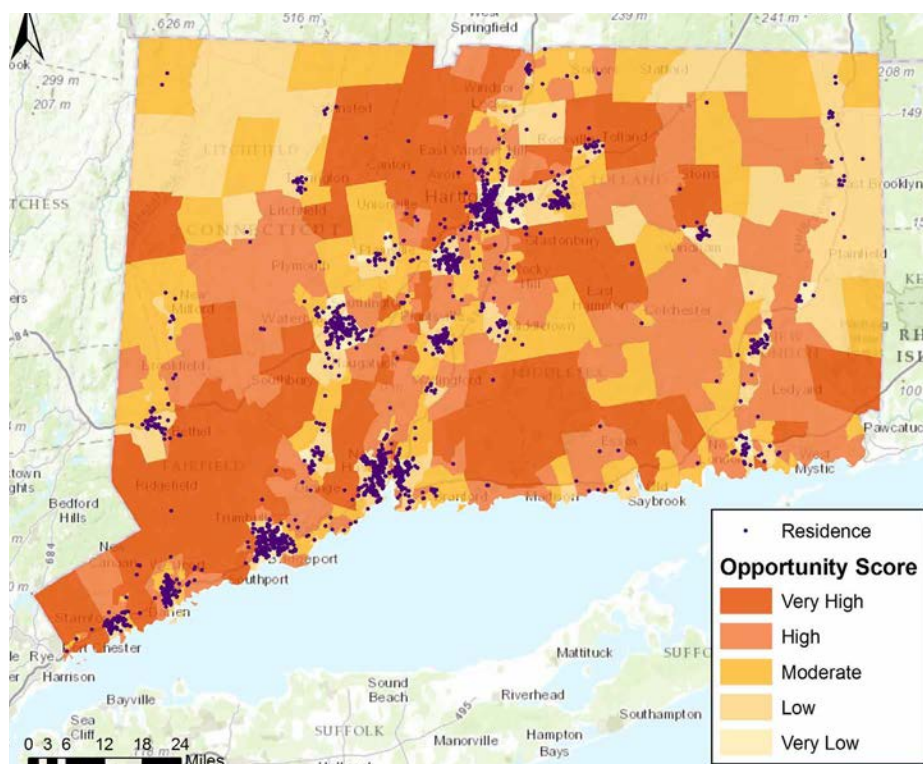
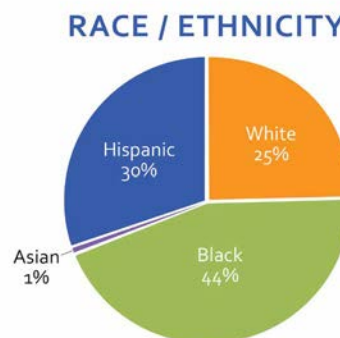


Figure 29: Rental Assistance Program and Opportunity



What Takes the "Choice" out of Housing Choice Programs?

A number of variables affect how voucher programs are run at the local level, all of which come together to reinforce segregation. These include:

1. **State policies that discourage families from living in lower-poverty communities, such as limits on where city housing authorities can authorize the use of HCV,**
2. **A lack of search assistance for families interested in making mobility moves,**
3. **Zoning policies that prevent the development of multifamily units in higher opportunity communities, and**
4. **For the HCV program, federal policies that discourage moves to higher opportunity neighborhoods.**

Some specific examples of current policies and restrictions that limit choice in tenant-based government subsidy programs include (a) rental assistance levels that are too low to allow participants to access thriving communities, (b) lack of wider access to mobility counseling and search assistance critical to making successful moves, (c) unavailability of security deposit and financial move assistance, (d) limited search periods that rush the search process for participants, and (e) for the HCV program, requirements by administrators that participants live within the administering jurisdiction for a specified period of time (a particular issue for lower opportunity housing authorities).⁴²

In addition to making structural changes to voucher programs, such as setting rents at sufficient levels to reach higher opportunity communities, mobility counseling is one of the most effective strategies for transforming voucher programs into pathways to opportunity. Mobility counseling is a counseling intervention that helps voucher recipients learn about the impact of neighborhood structures on life outcomes, connects interested recipients to actual available units in higher opportunity areas, and acts as a liaison between the recipients and their new community, if desired.

In 2016, Connecticut recommitted itself to this approach through a new contract with two mobility counseling providers. Currently, this program is funded at a level sufficient to provide services to less than 1% of households that receive vouchers through RAP and the portion of the tenant-based HCV program administered by the Department of Housing. The 23,202 of households who receive their vouchers through a municipal housing authority do not have access to such critical assistance.

⁴² For a deeper assessment of the factors that hinder the Housing Choice Programs, see Barbara Sard and Douglas Rice, *Realizing the Housing Voucher Program's Potential to Enable Families to Move to Better Neighborhoods*, Center on Budget and Policy Priorities, January 12, 2016, <http://www.cbpp.org/research/housing/realizing-the-housing-voucher-programs-potential-to-enable-families-to-move-to>.

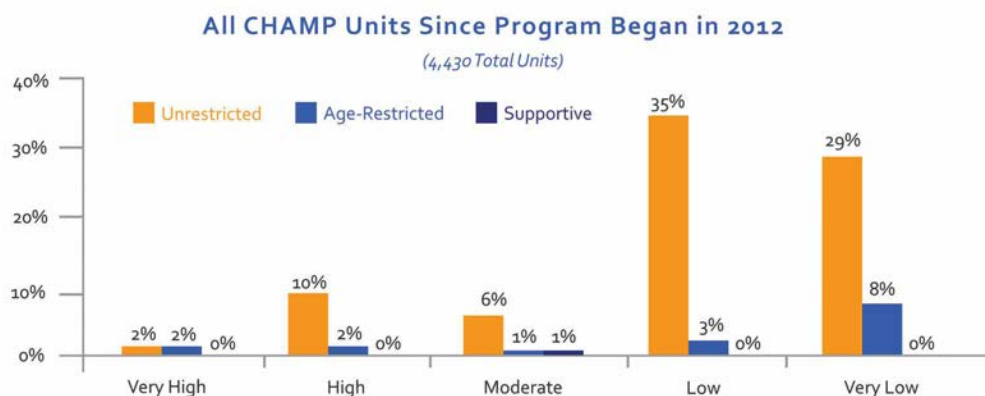
5. COMPETITIVE HOUSING ASSISTANCE FOR MULTIFAMILY PROPERTIES (CHAMP)

Through the Competitive Housing Assistance for Multifamily Properties (CHAMP) initiative, the Department of Housing provides gap funding to owners of existing developments and developers of proposed developments to increase the supply of affordable housing in Connecticut. Through this initiative, DOH seeks to leverage non-state funds to catalyze the creation and/or preservation of affordable multifamily housing to promote healthy lives, strong communities and a robust economy. DOH funds may be provided in the form of grants, loans or a combination thereof.

Since 2012, the program has provided at least \$185 million for affordable housing development or rehabilitation.⁴³ In addition, funds awarded under this initiative may be combined with financial assistance from the Connecticut Housing Finance Authority, including 4% low-income housing tax credits and taxable and/or tax-exempt bond financing.

Overall, CHAMP has served to further concentrate subsidized housing in low and very low opportunity areas. Sixty-four percent of the 4,430 units generated through the program is available on an unrestricted basis (so families and elderly are permitted) and located in lower opportunity areas, with another six percent in moderate opportunity tracts. Over the lifetime of the program, only 12% of units are unrestricted and placed in higher opportunity areas.

Figure 30: All CHAMP Units Since Program Began in 2012



Opportunity-access advocates were heartened to see a significant change in the mid-year (October 2016) allocations. Forty-six percent of the 172 units generated were available to families and in higher opportunity areas. Unfortunately, this trend did not continue in the next round (April 2017) where none of the 233 units supported through CHAMP were unrestricted and located in a higher opportunity area.

⁴³ Funding information was not available for Round 1 of the program

Figure 31: October 2016
CHAMP Units

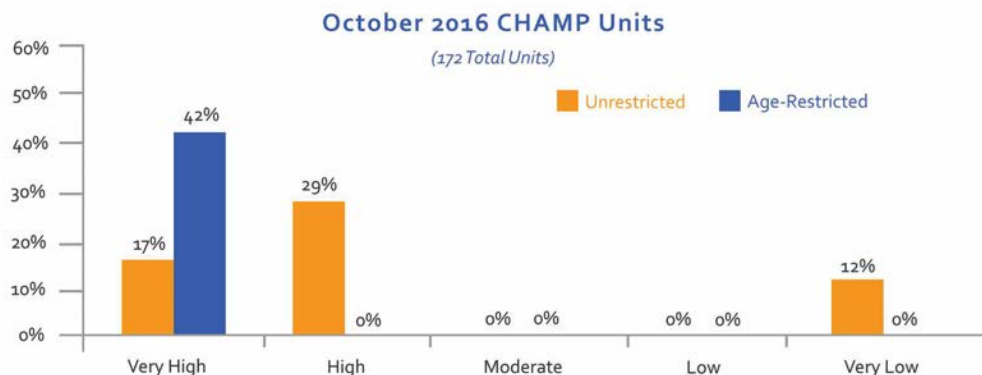
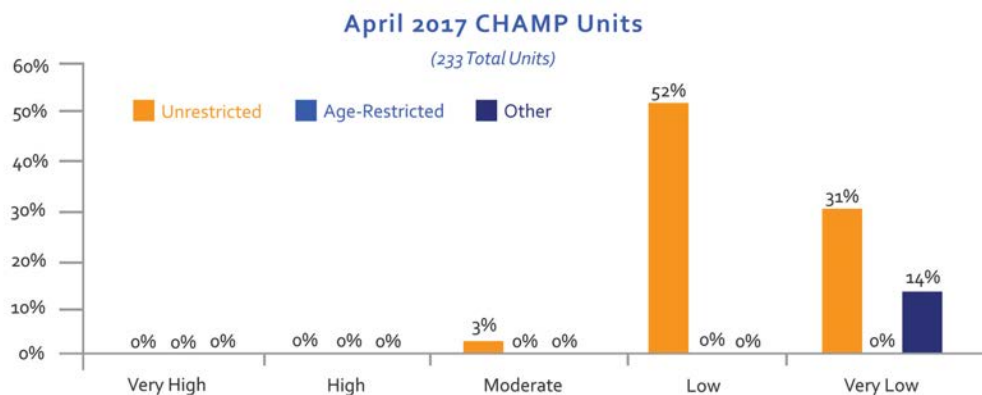


Figure 32: April 2017
CHAMP Units



The data on CHAMP are not produced by the state in a form that makes this kind of analysis easy. Full addresses are not provided and frequently difficult to discern through online research. It is not always clear whether units are restricted to elderly or veterans or designated as supportive housing. Generally, information on the number of bedrooms per unit is not provided, so it is entirely possible that units that appear to be unrestricted and available to families are, in fact, studios or one-bedrooms not feasible for most families who really need more bedrooms.



THE NEED FOR BETTER DATA

WHAT WE DON'T KNOW ABOUT AFFORDABLE HOUSING IN CONNECTICUT

- **Housing need:** We do not know the actual or projected need for affordable housing for people of different income levels, for families of different sizes, and for people of different ages and disability statuses. Homelessness-prevention advocates have worked for years to develop solid projections on the housing needed to address homelessness, and these critical estimates should augment further need projections so we can address homelessness over the long term. Without population-wide housing need numbers, we do not have the essential tools we need as a state to craft a comprehensive and thoughtful housing policy.
- **Geographic Targets:** We do not have targets to generate a stock of affordable housing that is diversely located and yet will not overwhelm our towns with unsustainable demands for services and resources. We need a plan for every town to welcome its fair share of affordable housing and to thrive.
- **Housing Data:** We lack a comprehensive list of our affordable investments, historical and contemporary. To be used effectively, these data must include all housing programs, be geocoded, and provide income-targeting details. Useful data must also include financing information that is currently not regularly made available to the public for many programs; this is true of much of the data analyzed in this report.

In addition to these data, there are other funding sources that we were not able to analyze for this report:

- **The State Housing Tax Credit Contribution Program:** This program provides funding to non-profit organizations for the development of affordable rental housing benefiting very low, low, and moderate-income households in Connecticut. Each year, the Connecticut Housing Finance Authority allocates up to \$10 million in state tax credits: up to \$500,000 per project. The program was initiated in 1987, and since that time has allocated \$185 million in state tax credits. Year-over-year data on this program in a form that can be geo coded is not publicly available.
- **State Bonding:** In 2016 the state invested about \$28 million in affordable housing via state bonding, but there is no publicly available system for tracking and analyzing

these investments. Most appear to be made in lower opportunity areas and amplify the spending that generates a geographic imbalance in housing, but it may be that some projects actually function to generate income diversity in lower opportunity neighborhoods. More detailed data would help evaluate that impact.

- **Project-Based Vouchers:** While relatively small with just 1,207 vouchers in use, Project Based Vouchers could be expanded and is a program with significant potential to improve housing choices for low-income families because it can be leveraged to place groupings of vouchers in particular areas. This could be used to affirmatively promote fair housing, and it is therefore important to track its performance.
- **Community Development Block Grant (CDBG):** The CDBG program, both the iteration that provides funding directly to cities (CDBG Entitlement) and the form that passes through the state to certain towns on a competitive basis (CDBG-Small Cities), comes with an explicit federal obligation to affirmatively promote fair housing. Better data on how these funds are used could help better shape it into a tool to advance housing choices.
- **Affordable Housing Appeals Act (AHAA or 8-30g):** It would be helpful to have more comprehensive data on AHAA, Connecticut's state law designed to foster more affordable housing development. Missing for this program are regularly published data on qualifying units separated by housing type (unrestricted v. age-restricted) and analyses of overlaps between subsidized, deed restricted, and government housing subsidies that might lead to double-counting.
- **HOME Investment Partnerships Program (HOME):** The federal HOME program can be used to generate affordable homeownership or rental homes and can be used to create such opportunities in a balanced way across geographies. An analysis by the Poverty and Race Research Action Council has already demonstrated that the HOME program is distributed in a manner that promotes poverty concentration in the Hartford region, but the entire state should be analyzed and additional data are needed to fully understand HOME investments.⁴⁴ These data holes include information on restricted versus unrestricted requirements for the units (i.e., age-restricted v. permitting families with children), rehabilitation versus new construction, and other subsidies layered with the project.

⁴⁴ Gayles, E. & Mathema, S. (2014, September). *Is the HOME Program Affirmatively Furthering Fair Housing?*, Washington, D.C.:Poverty and Race Research Action Council. Retrieved from <http://prrac.org/pdf/HOME-AFFH.pdf>.



POLICY RECOMMENDATIONS

At Open Communities Alliance, our vision is to link lower income people who have not had access to opportunity in Connecticut to areas that are rich in opportunity through housing and other resources, in a manner that is not detrimental to receiving communities. Such a strategy is a necessary complementary component to a strategy of bringing resources to lower opportunity areas to generate vibrant communities. Combined, these approaches allow for the *voluntary* de-concentration of poverty through housing choices in a variety of communities, while ensuring housing is affordable for people who want to stay in areas that are revitalizing. This empowers all communities to thrive. That is the essence of an “open communities” approach for Connecticut – a state where people have the genuine choice to live in areas that best meet the needs of their families and children.

INCREASE ACCESS TO OPPORTUNITY

1. **Set specific numerical goals for balancing housing investments across geographies, including in higher opportunity areas.** This report demonstrates how our affordable housing investments are out of balance, limiting choices for low-income families, hobbling community-led revitalization, and leading to the concentration of poverty and diminished life chances for our children. Improved policies for locating units of subsidized housing in a more balanced way, including in higher opportunity areas, is urgently needed to counter this long history of unbalanced placements. The state should set annual goals for the de-concentration of subsidized housing and implement strategies for evaluating proposals and distributing funds and incentives that will meet those goals.
2. **Increase housing choice through mobility counseling.** Recently passed legislation (Public Act No. 15-153) formalizes the existing mobility counseling program and applies stronger standards that have proven effective elsewhere in the country. To further improve this program, full funding should be allocated. In addition, the program should adopt performance standards used elsewhere in the country to prioritize families most interested in moving to higher opportunity communities.
3. **Improve data collection and analysis of affordable housing.** We need to collect the data that will allow us to know what our housing resources are. While a host of state and federal legal obligations require the collection and analysis of such data, the state does not have a publically available comprehensive list of its subsidized housing stock that

includes critical information like location, income targeting, population served, financing details, and resident demographics. A summary of existing legal obligations is included in Appendix C.

4. **Increase rents under the Housing Choice Voucher and Rental Assistance Programs.** The rents used in these tenant-based programs are generally too low for program participants to gain access to higher opportunity areas. HUD recognizes this and, under the Obama administration, issued alternative calculations called Small Area Fair Market Rents, which were to be implemented in certain regions, including the Hartford region, starting in January of 2018. These were rescinded by the Trump administration on August 11, 2017.⁴⁵ Nevertheless, Connecticut can seek to adopt this formula statewide to increase the ability of low-income recipients to use rental vouchers in higher opportunity areas.
5. **Explore broader housing authority jurisdiction.** Currently, the jurisdiction of housing authorities is limited to their own municipal boundaries. This acts as a disincentive to lower-opportunity housing authorities to offer housing choices to their residents in higher opportunity areas. Expanding housing authority jurisdiction to allow housing authorities in struggling communities to encompass nearby thriving communities would increase housing choices. This recommendation was considered by the Connecticut Legislature in the 2017 session.
6. **Ensure affirmative marketing across racial lines for government-supported housing.** Government subsidized housing is already subject to affirmative marketing requirements at the federal and state level, but the implementation of these requirements needs to be bolstered to include an assessment based on the percentage of income qualified persons of various races within the region compared to persons residing in the development, newly entering residency, and on the waiting lists (current assessments do not consider the population of qualified persons, just the overall regional racial demographics). Further, results need to be reviewed annually and the state needs to develop meaningful consequences for developments that are failing to attract representative populations.
7. **Fully fund fair housing testing and enforcement programs.** It is critical that the state support robust fair housing testing and enforcement to ensure that housing discrimination does not persist in the private market. Connecticut is fortunate that the state has for over a decade funded the Connecticut Fair Housing Center's work in these areas. This funding should be expanded.
8. **Address Exclusionary Zoning by Adopting Fair Share Housing.** Connecticut has some of the most exclusionary zoning in the nation.⁴⁶ While not the focus of this report, zoning restrictions severely limit where for-profit and non-profit developers build affordable and subsidized housing. Exclusionary zoning prevents developers from even considering

⁴⁵ HUD's August 11, 2017 letter is available here: http://www.prrac.org/pdf/Small_FMR_Letter_A_8-11-2017.pdf.

⁴⁶ Rothwell, J. (2012, April). *Housing Costs, Zoning, and Access to High-Scoring Schools*. Washington, D.C.: Brookings Institute. Retrieved from <http://www.brookings.edu/research/papers/2012/04/19-school-inequality-rothwell>.

higher opportunity locations. This, in turn, hinders the state from providing housing choice and affirmatively furthering fair housing, even though the authority to control zoning is a state power that is delegated to towns. The state can take a more robust role in overseeing zoning. This could include adopting “fair share” targets for towns that are tied to the receipt of state funding, reviewing town zoning ordinances to ensure compliance with state laws such as the Zoning Enabling Act, CGS Sec. 8-2, and developing model zoning ordinances.

REVITALIZE STRUGGLING COMMUNITIES

Local leaders and advocacy organizations continue to advance policies to revitalize and build thriving communities in struggling areas, and Open Communities Alliance will continue to be a partner and support policies that improve the life chances of all our families. Some of these recommendations may require support from neighboring thriving communities.

1. **Expand community revitalization investments beyond housing - for example, support of small business development and “place making” streets, parks and community centers.**
2. **As communities are revitalizing, implement policies that protect against involuntary displacement, ensure income diversity, and support neighborhood institutions.**
3. **Support policies that make neighborhoods safer with high levels of community involvement.**
4. **Vigorously support schools, mentoring programs, after school activities, community colleges, scholarship programs, and job training opportunities.**
5. **Invest in resources that strengthen family and community connections.**



APPENDIX A:

Opportunity Mapping Data Sources & Explanations

WHAT IS OPPORTUNITY?

For this analysis, opportunity is defined as environmental conditions or resources that are conducive to healthier, vibrant communities and are associated with success in life, defined in a variety of ways. Indicators could either be impediments to opportunity (which are analyzed as negative neighborhood factors, e.g., high neighborhood poverty) or conduits to opportunity (which are analyzed as positive factors, e.g., access to an abundance of jobs).

To map opportunity in the region, we use variables that are indicative of high and low opportunity. High opportunity indicators include the availability of sustainable employment, high-performing schools, a healthy environment, and safe neighborhoods. Low opportunity indicators include the lack of sustainable employment options, struggling schools, and higher crime rates. A central requirement of indicator selection is a clear connection between the indicator and opportunity.

DATA SOURCES

Spatial distribution of opportunity is based on indicators categorized under three sub-areas of opportunity: Educational; Economic; Neighborhood/Housing quality. The comprehensive opportunity map represents the combined score based on these three sub-areas.

This updated 2015 Opportunity Index for Connecticut is based on 12 variables from similar public data sources, as described below.

- **Educational indicators**
 - Educational attainment for the population (college and associates degrees)
 - 3rd grade reading test scores
 - 3rd grade math test scores
- **Economic indicators**
 - Unemployment rates (percent in labor force but unemployed)
 - Economic climate
 - Employment access
 - Job diversity
 - Population on public assistance

- **Neighborhood / housing quality indicators**
 - **Home ownership rate**
 - **Crime rate**
 - **Vacancy rate (percent vacant housing)**
 - **Poverty (percent below poverty line)**

CENSUS DATA FOR NEIGHBORHOOD VARIABLES

The index uses census tracts as a proxy for ‘neighborhoods,’ which are reported as 5-year estimates from the American Community Survey. The `acs.R` package⁴⁷ uses the Census API to download data by tract for the entire state for each of these seven variables. For this project, the 2008 - 2012 5-year estimates are reported, but the script could be updated for new years as data becomes available.

To ensure that each of the variables is oriented in the same ‘direction’ (more homeownership is ‘good,’ while more poverty is ‘bad’), the public assistance, poverty, unemployment and vacancy rates are converted to their inverse percentages (i.e. 1 minus rate).

TOWN DATA: TEST SCORES

The variables for math and reading test scores and job growth aren’t publicly available at the neighborhood level.

Math and reading scores for Connecticut are reported by the State Department of Education at the school and district level.⁴⁸ Since many children do not attend neighborhood schools, even if data were readily available by neighborhood, it might not accurately represent the academic performance for students residing in that neighborhood. As a proxy, the index uses the average scale scores for the local school district in each town. Average scale scores take into account the performance of all students, not just those crossing a particular threshold. The Connecticut index uses 3rd grade reading and math scores as a standard milestone indicator for education.⁴⁹

A few smaller districts do not have 2013 reports for math and reading test scores, so the most recent year available was used instead. Cornwall and Union did not have data for any of the past seven years and thus don’t report values for this variable. Scores for regional school districts were manually assigned to each town in that region.⁵⁰

TOWN DATA: ECONOMIC CLIMATE AND CRIME

“Economic climate” was defined for the original Opportunity Index as “the change in jobs within 5 miles from 2005 to 2008,” using data from ESRI Business Analyst. In order to not rely on proprietary data sources, like Business Analyst, this index relies on data from the Quarterly Census of Earnings and Wages series from

47 Available at <https://cran.r-project.org/web/packages/acs/index.html>.

48 See <http://www.ctreports.com>.

49 See <http://gradelevelreading.net>.

50 Available at www.csde.state.ct.us/public/psis/downloads/RegionalSchoolDistrictsMemberTowns.xls.

the Bureau of Labor Statistics.⁵¹ Data from this series is a direct census of employment from wage records reported by town. The index uses 2009 to 2012 as the timeframe, as the most recent available at the time of this update.

As in the prior Opportunity Index, the job change data has some outlier values, particularly for small towns (for example, Barkhamsted, where employment doubled from 616 to 1145 people over the three years). These are noticeable in the summary stats reported below, but the effect of this should be minimized when combined with the other index components that are largely uncorrelated with this measure of economic climate.

Crime rates are reported by local authorities to the Uniform Crime Reports database.⁵² Rates are calculated as the number of incidents in a town divided by the current population of the town. For this index, the 2010 crime rates are used as the most recent readily-available for the state.⁵³

EMPLOYMENT ACCESS AND DIVERSITY INDICES

The final two variables provide new measures for access to employment and the diversity of local job markets. Data for both of these indices are drawn from the Location Affordability Index (LAI).⁵⁴ LAI values are reported at the block group level for metro areas in Connecticut, but for the Opportunity Index the metro-level results are combined and aggregated at the census tract level in order to combine with the other variables.

The methodology for calculating access to employment and jobs diversity is described more fully in the LAI documentation.⁵⁵

The employment access index replaces the average commute time variable from the previous Opportunity Mapping effort in Connecticut.⁵⁶ The jobs access index measures potential access to jobs - indicating opportunity - rather than the actual commute times experienced by currently employed residents. The index is calculated as the number of jobs in a block group, divided by the squared distance to that block group - jobs that are closer to a given neighborhood are thus weighted more highly than jobs that are distant from that neighborhood.

The jobs diversity index looks at the correlation between 20 major job sectors - areas with higher concentration in a few sectors are reported as having lower diversity. For instance, in Connecticut, parts of Fairfield County with a high concentration of employment in finance and insurance are reported with relatively low levels of job diversity.

For more information, visit http://www.ctoca.org/opportunity_methodology

51 See <http://www1.ctdol.state.ct.us/lmi/>.


52 See <http://www.dpsdata.ct.gov/dps/ucr/ucr.aspx>.

53 See <http://data.ctdata.org/dataset/ucr-crime-index>.

54 See <http://www.locationaffordability.info>.

55 See <http://www.locationaffordability.info/LAPMethods.pdf>.

56 See <http://www.ctfairhousing.org/people-place-and-opportunity-report/>.



APPENDIX B:

Introduction to Publicly-Subsidized and Affordable Housing

AFFORDABLE HOUSING - TWO DEFINITIONS:

- **Rule of Thumb:** No more than 30% of a household's gross income should be spent on rent and utilities. Households paying over 30% of their income are considered "cost burdened." Households paying over 50% of their income are considered severely cost burdened.
- **"Affordable" as defined by the CT Affordable Housing Appeals Act (8-30g):** A development in which at least 30% of the units are restricted by deed to remain affordable for 40 years to households earning 60%-80% or less of Area Median Income.⁵⁷

SUBSIDIZED V. AFFORDABLE HOUSING:

Subsidized housing is housing intended for use by low and moderate-income individuals and families that is supported in some way by local, state or federal funding. While income requirements vary, most subsidized housing programs are targeted for people under 50% of Area Median Income. Some programs, especially those focused on homeownership, have higher income thresholds. Government dollars can support subsidized housing in a number of ways including assisting with construction or rehabilitation costs or ongoing expenses.

Affordable housing may be subsidized, but also may be naturally affordable such that a family earning median income or below can support rent and other housing-related costs with less than 30% of their income.

Subsidized housing can be further broken down into three types:

- **Hard or Physical Units:** Housing where subsidies assist with building or rehabilitating a physical structure. *Examples: Federal public housing and the State Supported Housing Portfolio.*
- **Operating Subsidies:** Government funding helps to cover housing costs to ensure the affordability of particular units of housing. *Example: Project-based Section 8.*

⁵⁷ Note: The Affordable Housing Appeals Act requires that "15% of the units will be conveyed by deeds containing covenants or restrictions which require that, for at least forty years, such dwelling units shall be sold or rented at, or below, prices which will preserve the units as housing for which persons and families pay thirty per cent or less of their annual income, where such income is less than or equal to 80% of the median income, and at least 15% to 60% of the median income." Certain government-financed homeownership loans also count towards the definition of affordable units. (Conn. Gen. Stat. § 8-30g).

HOME Entitlement Jurisdictions

Bridgeport
Hartford
New Britain
New Haven
Stamford
Waterbury

CDBG Small Cities Eligible Jurisdictions

Bridgeport
Bristol
Danbury
East Hartford
Fairfield
Greenwich
Hamden
Hartford
Manchester
Meriden
Middletown
Milford
New Britain
New Haven
New London
Norwalk
Norwich
Stamford
Stratford
Waterbury
West Hartford
West Haven

- **Tenant-Based Subsidies:** Housing subsidies that are given to individuals or families to cover a portion of their rent on the private market, usually with the goal of ensuring they do not have to pay more than 30% to 40% of their income towards rent up to a certain cap. *Examples: Housing Choice Voucher program (HCV) (federal) and Rental Assistance Program (RAP) (state-funded).*

Significantly, a person working full-time at minimum wage earns less than 50% of AMI and qualifies for many subsidized housing programs.

HOW DOES CONNECTICUT FUND HOUSING?

A. Sources of Federal funds

1. **Low-Income Housing Tax Credit (LIHTC):** Supports the development or rehabilitation of physical units of multifamily housing with at least a percentage of units affordable to families with incomes of 50% of Area Median Income or below; \$7-10 million annually to Connecticut. A total of 24,580 units have been developed or rehabilitated in Connecticut with LIHTC support since the program began in 1987.⁵⁸ Tax credits flow from the U.S. Department of Treasury to the Connecticut Housing Finance Authority, which determines the criteria for a competitive application process to select developers who then typically sell the credits on the private market to partially fund their developments. Other subsidies, private financing, and bond funds generally also support LIHTC projects, so this program frequently drives where other subsidized housing dollars go.

LIHTC developments can be mixed income or 100% affordable. Although an analysis has never been done in Connecticut, housing experts in Massachusetts report that mixed income LIHTC developments in lower opportunity areas typically have high tenant-based subsidy occupancy rates – meaning they are more likely to be entirely low-income. Mixed income developments can be a valuable tool for addressing housing segregation, but developing them in higher opportunity areas is one of the best strategies to achieve this goal.

2. **Housing Choice Vouchers (Section 8):** Vouchers for housing units that attach either to the tenant or to the unit; participants must be below 50% of median income for the county or metropolitan area (75% of participants must be below 30% median income); participants must contribute 30-40% towards rent and the program covers the remaining portion, up to a cap.

- **Tenant-Based Housing Choice Vouchers (Tenant-Based Section 8):** Tenant based subsidy; 30,975 vouchers; 73,202 people assisted; \$330 million annually in Connecticut.⁵⁹

⁵⁸ Connecticut Housing Finance Authority. (2012). Preservation List. (With additions by OCA.)

⁵⁹ Department of Housing & Urban Development Tenant Characteristics Report. (n.d.). Retrieved August, 2017, from <https://www.hudexchange.info/grantees/>.

- **Project-Based Vouchers:** Subsidy attached to hard units; 1,400 vouchers; 2,896 people assisted; \$15 million annually (est.).⁶⁰

3. **HOME Funds:** \$7.6 million annually (state – dispersed to certain communities); \$4.3 million annually (6 entitlement jurisdictions).⁶¹ Supports activities that increase affordable homeownership and rental opportunities for low and very low-income households defined as people earning less than 60% of Area Median Income.⁶²

4. **Community Development Block Grant:** \$12 million annually (Small Cities – distributed to designated towns via a state competitive process); \$23.5 million annually (22 entitlement jurisdictions).⁶³ Funds available for a range of improvements, from public infrastructure, such as sidewalks, to housing rehabilitation.

B. State funds (grants, loans, bonds)

1. **Competitive Housing Assistance for Multifamily Properties (CHAMP):** \$50-75 million annually. 4,430 units created since the program began in 2012.⁶⁴ Designed to create and preserve affordable housing through grants, loan guarantees, and below-market interest rate loans. The funded units must be affordable to households earning less than 100% to 120% Area Median Income.

2. **Rental Assistance Program (tenant-based or project-based):** Tenant based subsidy; \$42- 54 million annually. 6,044 households served.⁶⁵ Qualifying households may not have incomes that exceed 50% Area Median Income.

3. **\$300 million State-Sponsored Housing Portfolio Revitalization Initiative:** \$30 million of state bonding funds annually to revitalize subsidized housing serving families at 100% Area Median Income or below.⁶⁶ 10,749 units are eligible for funding under this initiative, with the first funding round awarded in October 2016 to 685 units.

4. **Housing Tax Credit Contribution Program:** \$10 million annual maximum.⁶⁷ Provides funding of up to \$500,000 to non-profit organizations for the development of affordable rental housing that benefits households not earning more than 100% of Area Median Income.

5. **State Bonding:** Potential state bonding funding for mixed income or market rate housing. Amount varies annually.

60 Id. The program cost is estimated based on the per voucher cost of the Housing Choice Voucher program.

61 DOH Annual Action Plans, <http://www.ct.gov/doh/cwp/view.asp?a=4513&q=530462>; Department of Housing and Urban Development. (2017). *HOME Activities Report – Connecticut – July 31, 2017*. Retrieved from https://www.hudexchange.info/programs/home/home-activities-reports/?filter_DateYearEach=2017-07-31&filter_State=CT&program=HOME&group=Act.

62 For rental housing and rental assistance, at least 90 percent of benefiting families must have incomes that are no more than 60 percent of the HUD-adjusted median family income for the area. In rental projects with five or more assisted units, at least 20% of the units must be occupied by families with incomes that do not exceed 50% of the HUD-adjusted median.

63 Department of Housing and Urban Development. (2017). *CDBG Grantee Expenditure Reports*. Retrieved from <https://www.hudexchange.info/programs/cdbg/cdbg-expenditure-reports/>.

64 Connecticut Housing Finance Authority. (2012). *Preservation List*. (With additions by OCA.)

65 DOH Annual Reports, <http://www.ct.gov/doh/cwp/view.asp?a=4513&q=530462>.

66 Id.

67 Connecticut Housing Finance Authority. (n.d.). Tax Credit Programs – State Housing Tax Credit Contribution (HTCC) Program. Retrieved from <http://www.chfa.org/Rental%20Housing/for%20Developers%20and%20Sponsors/Funding%20Initiatives/Tax%20Credit%20Programs/HTCC%20Program.aspx>.

APPENDIX C:

Housing Data and Goal Needs and Legal Obligations

In order to foster results-based accountability on progress addressing housing segregation, it is critical to employ an analytical framework to assess progress. Current state and federal law and regulation provide considerable obligations to collect and analyze housing need and available housing resources, and to assess progress on affirmatively furthering fair housing. Unfortunately, these obligations are not working together to produce useable data and set meaningful, measurable goals to demonstrate progress.

The elements needed for an effective fair housing accountability framework include:

1. **Current Housing Need:** Assessment of the existing need for housing at various income levels, with particular focus on the needs of historically disenfranchised groups including:
 - Families with children (noting the need of families of varying sizes),
 - Single-parent households (noting the need based on the type of single-parent – mother, father, other family member, or other caregiver),
 - Households with a member with a disability (with attention to individuals with mobility challenges and disabilities that are likely to contribute to chronic homelessness),
 - Households needing supportive housing or addressing the needs of homeless individuals and families, and
 - Households of color.
2. **Projected Housing Need:** A projection of the future need for housing, including at various income levels and the need of the historically disenfranchised groups listed above.
3. **Existing Housing Resources:** A detailed assessment of existing housing resources. These include both existing physical units of subsidized housing and vouchers or other resources that are attached to tenant households. For each type of resource the following information is needed:
 - **Physical Units of Subsidized Housing**
 - Development name and contact information
 - Developer name and contact information
 - Developer for-profit v. non-profit status
 - Management company name and contact information
 - Management company for-profit v. non-profit status
 - Number of units by census tract
 - Targeting requirements (percentage of units dedicated to various income requirements)

- Unit population restrictions (elderly, supportive, veterans, people with disabilities, unrestricted)
- Number of bedrooms in each unit
- Financing characteristics (sources of financing and amounts, including specifics on government funding programs)
- Date of first occupancy
- Date of subsidy expiration
- Administering government entity (municipality, housing authority, state, federal agency)
- Owning entity (private non-profit, private for-profit, municipality, housing authority, state, federal agency)
- Type of subsidy investment – new construction v. rehabilitation
- Displacement data, if rehabilitation – percentage of tenants by income level in original development v. percentage in new development
- Tenant characteristics by race and ethnicity
- Tenant characteristics by single-parent households (noting the need based on the type of single-parent – mother, father, other family member, or other caregiver)
- Link to most recently produced affirmative marketing plan
- Type of occupancy (homeownership v. rental v. co-op)
- Occupancy by government housing subsidy holders in targeted and market rate units and designated by tenant-based v. project-based subsidy.
- PILOT and tax abatement status.
- **Tenant-Based Government Housing Subsidies**
 - Family composition (number of parents or guardians, number of children)
 - Household ages for parents and children
 - Tenant characteristics by single-parent households (noting the need based on the type of single-parent – mother, father, other family member, or other caregiver)
 - Presence of a person in the household with a disability and, specifically noting if a household member experiences mobility challenges
 - Race and ethnicity
 - Income
 - Location by census tract
 - Rent and tenant portion
 - Utilities
 - Units in development
 - Number of bedrooms of unit

4. Goals and Reporting: Set goals and periodic reporting on results for meeting the state's housing needs in a manner that permits wider geographic choices for historically disenfranchised populations in a manner that promotes fair housing as articulated by the state and federal fair housing acts.

HOUSING DATA COLLECTION LEGAL REQUIREMENTS

The state is subject to a plethora of statutory and federal regulatory obligations to collect the type of data that is needed for basic fair housing analysis. These fall into four general categories:

- **Requirements to collect data on housing need;**
- **Obligations to gather data on physical units of subsidized and affordable housing;**
- **Mandates to accumulate data on households residing in subsidized housing and using tenant-based subsidies, and**
- **Responsibilities to affirmatively further fair housing in the administration of housing programs, including through setting specific goals that actively work to counter the history of segregation**

Despite these extensive reporting and goal-setting obligations, the state is missing the key components needed for a meaningful results-based accountability assessment. Missing are:

- **Comprehensive data on current and projected housing need.**
- **Publicly available, personally non-identifiable data across all relevant agencies on tenant characteristics and locations, including for participants in tenant-based voucher programs.**
- **A publicly available geocoded unified list of subsidized housing unit locations and characteristics (e.g. elderly-only, supportive, etc.).**
- **Affirmative marketing results data across agencies.**
- **Specific numerical goals for government-subsidized units to be located in areas with strong networks of opportunity structures like employment options and high performing schools.**
- **Ongoing meaningful analyses of progress on affirmatively furthering fair housing within funded programs.**

Creating an appropriate evaluation system should be supported through both state and federal resources. As state resources to create additional subsidized housing have increased considerably over the last several years, policy and planning resources, at least within the Department of Housing, have diminished. It is critical to support effective affirmatively furthering program evaluation.

The state and federal laws and regulations supporting these obligations will be reviewed in turn. OCA anticipates producing an assessment of performance under these obligations.

DATA COLLECTION ON HOUSING NEED

The following sources mandate collection of data indicating housing need:

1. **CGS Sec. 8-37s:** DOH must, “monitor the progress of the public and private sector toward meeting housing needs ...”
2. **CGS Sec. 8-37t:** DOH and CHFA are to produce a Consolidated Plan in conformance with HUD requirements pursuant to 24 CFR Part 91, which mandates submission of detailed housing needs assessment under Section 91.305 in exchange for the receipt of certain federal housing funding.
3. **Consolidated Plan, 24 CFR Part 91, section 91.305:** This federal regulation requires, as a condition of HUD funding, the submission of a Consolidated Plan to HUD every five years. This plan must include an estimate of the number and type of families in need of housing assistance and requires reporting on a range of characteristics including race and income.
4. **Consolidated Plan, 24 CFR Part 91, section 570.490 Recordkeeping requirements.** This federal regulation requires that recipients of funding through the Community Development Block Grant program collect “data on the racial, ethnic, and gender characteristics of persons who are applicants for, participants in, or beneficiaries of the program. The records shall also permit audit of the states in accordance with 24 CFR part 85.”

DATA ON PHYSICAL UNITS OF SUBSIDIZED HOUSING

Several statutory and regulatory requirements provide for the collection of data on physical units of subsidized housing. These include:

1. **CGS Sec. 8-37s:** This statute requires, that DOH, “. . . collect and annually publish data on housing production in the state.”
2. **CGS Sec. 8-37bb(c):** This statute creates an obligation to complete extensive reporting on the state’s subsidized housing stock. It originally applied to CHFA and the Department of Economic and Community Development, which previously ran many of the state’s housing programs. In 2011 DECD successfully advocated for its removal from the statute, arguing that it was duplicative of the data required by HUD’s Consolidated Plan. This exemption has been carried through to the Department of Housing, which was re-established by the Legislature in 2012.

While the statute puts considerable emphasis on data reporting on households served, it also mandates reporting by development including requiring,

- “The analysis shall provide information by housing development, if applicable, and by program.”
 - “That such data be provided by census tract.”
3. **CGS Sec. 8-37cc:** This statute requires that DOH and CHFA, “...affirmatively promote fair housing choice and racial and economic integration in all programs administered or supervised by such housing agency.” Without a solid understanding of the location of the existing subsidized housing stock, it is

not possible to comply with this mandate. The entire notion of affirmatively furthering fair housing is premised on understanding the segregating housing placements of the past and remedying them going forward.

4. **(4) CGS Sec. 8-37ff:** This state statute requires that DOH, “develop and maintain a comprehensive inventory of all assisted housing, as defined by section 8-30g, in the state. Assisted housing, as defined by section 8-30g, includes “housing which is receiving, or will receive, financial assistance under any governmental program for the construction or substantial rehabilitation of low and moderate income housing, and any housing occupied by persons receiving rental assistance.”
5. **CGS Sec. 8-37t:** This statute, discussed above, requires DOH and CHFA to produce a needs assessment in accordance with 24 CFR Part 91. Section 91.310 requires a Housing Market Analysis.
6. **Consolidated Plan, 24 CFR Part 91, section 91.310:** This provision requires that the state produce,
 - **A description of the significant characteristics of the state’s housing market, including supply, demand, and cost.**
 - **“A brief inventory of facilities and services that meet the needs of homeless persons within the state, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth.”**
 - **An inventory of services for homeless persons and mainstream services that may help homeless persons.**
 - **A description of the facilities and services available to those who are not homeless but who required supportive housing.**
7. **Duty to Affirmatively Further Fair Housing, 42 U.S.C. §§ 3601-3619:** The regulatory details for this obligation are provided in HUD’s 2015 Affirmatively Furthering Fair Housing Rule, 24 CFR Parts 5.91, 92, et al. Under subsection 5.154, Assessment of Fair Housing (AFH), the state as a recipient of certain HUD housing support, is required to assess the disproportionate housing needs based on race, color, religion, sex, familial status, national origin and disability. A prerequisite for doing this is an inventory of the government-supported subsidized housing stock.

As part of the Assessment of Fair Housing process, HUD provides extensive data on HUD- supported housing developments such as public housing and Low Income Housing Tax Credit developments. Still, these inventory lists are often missing critical information such as the cost- per-unit and special populations served.

Local data must also be used and are defined as, “... metrics, statistics, and other quantified information, subject to a determination of statistical validity by HUD, relevant to the program participant’s geographic areas of analysis, that can be found through a reasonable amount of search, are readily available at little or no cost, and are necessary for the completion of the AFH using the Assessment Tool.”⁶⁸

68 Affirmatively Furthering Fair Housing Regulation, 24 C.F.R. 5.152.

DATA ON TENANT DEMOGRAPHICS

1. **CGS Sec. 8-37bb:** Connecticut Housing Finance Authority must submit annual reports on its programs including,

- An analysis of “the households served under each program by race....Each analysis shall include data for all households (1) entering an agency program during the year...and (2) in occupancy or receiving the benefits of an agency rental program....The report ...shall also identify, by census tract, the number of households served in each program and the total amount of financial assistance provided to such households.
- “[D]ata on the racial composition of the occupants and persons on the waiting list of each housing project which is assisted under any housing program established by the general statutes or special act or which is supervised by the agency...”

2. **CGS Sec. 8-37ee:** Connecticut requires affirmative marketing of entities participating in programs administered by CHFA and DOH. Entities involved in DOH programs are required to submit affirmative marketing plans and report on outcomes per Connecticut Regulation Sec. 8-37ee-1 et seq. It is not clear whether CHFA is subject to these regulations.

In addition, under CGS Sec. 8-37ee, CHFA and DOH are required to, “...periodically review each plan to assure that to the extent practicable such an applicant pool is created and may require that a plan be revised by the entity submitting it.” Presumably to do such a review tenant demographic information must be aggregated, analyzed, and, ideally, made available to the public.

3. **Duty to Affirmatively Further Fair Housing, 42 U.S.C. §§ 3601-3619:** Numerous HUD programs require affirmative marketing and assessments of marketing results. This, by necessity, calls for a review of tenant demographics. The programs that require affirmative marketing plans and review include:⁶⁹

- **Section 8 Housing Assistance Payments Program**⁷⁰
- **HUD Insured Programs**⁷¹
- **Property Disposition Programs**⁷²

4. **CGS Sec. 8-37qq(A)(4)(b)(viii):** This statute requires that the DOH annual report include:

...[D]ata on the racial composition of the occupants and persons on the waiting list of each housing project that is assisted under any housing program established by the general statutes or a special act or that is supervised by the department...

69 For a summary see Department of Housing and Urban Development. (n.d.). Handbook References in Housing Programs. <https://portal.hud.gov/hudportal/documents/huddoc?id=80251x4FHEH.pdf>.

70 See New Construction Processing Handbook, 7420.1 REV.; Substantial Rehabilitation Processing Handbook - 7420.2 REV. 1; Section 8 Additional AssistSee HUD guidance - New Construction Processing Handbook, 7420.1 REV.; Substantial Rehabilitation Processing Handbook - 7420.2 REV. 1; Section 8 Additional Assistance Program for Projects with HUD-Insured or HUD-Held Mortgages (HUD Handbook 4352.1); Section 202 Direct Loan Program for Housing for the Elderly and Handicapped, Handbook 4571.1 REV.; Section 811 Supportive Housing for Persons Disabilities, Handbook 4571.2; Handbook 4571.3 - Section 202 Supportive Housing for the Elderly.

71 See HUD guidance - Single Family Subdivision Processing Handbook (4135.1); Occupancy Requirements of Subsidized Multifamily Housing Programs, dated 11/4/81 Handbook 4350.3; Single-Family Direct Endorsement Program, dated September 1988, Handbook 4000.4 REV-1.

72 See HUD guidance - Property Disposition Handbook - One to Four Family Properties - Handbook 4310.5; Multifamily Property Disposition Handbook - Management Handbook 4315.1 REV-1, Paragraphs 6-2 and 6-3; Handbook 2210.16, Property Disposition Contracting (Reserved).

GOALS AND REPORTING

Several documents are intended to set housing or development-related goals for the state. These include three HUD-required reports and the state Plan of Conservation and Development. These four documents should reflect the same goals designed to affirmatively further fair housing.

- 1. Analysis of Impediments to Fair Housing Choice 2015:** The Analysis of Impediments to Fair Housing Choice (AI) has, up until 2015, been the major reporting mechanism HUD has used to promote compliance with the federal duty to affirmatively further fair housing. Unfortunately, it has lacked meaningful enforcement and guidance at the federal level. Starting in 2015, the AI was replaced with the new requirement for an Assessment of Fair Housing, which is supported by a more robust reporting and review process.
- 2. 2015-2019 Consolidated Plan:** The Consolidated Plan is a planning document required by HUD as a condition of federal housing funding. It is intended to “...help states and local jurisdictions... assess their affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions.” The AI and Consolidated Plan are companion reports. In fact, as part of the Consolidated Plan, HUD grant recipients must certify that they will affirmatively further fair housing, through conducting an AI, taking appropriate actions to overcome the effects of any impediments identified through that analysis, and maintaining records of these actions.
- 3. 2015-2016 Action Plan:** The DOH 2015-2016 Action Plan is intended to provide further detail on executing the Consolidated Plan and recommendations of the AI. Perplexingly, the goals stated in the Consolidated Plan are not explicitly reflected in the Action Plan.
- 4. Plan of Conservation and Development:** As required by CGS Sec. 16a-26, the Plan of Conservation and Development (POCD) is the primary state document guiding land and water conservation and development. It is founded on a “bottom up” process administered by the Office of Policy and Management (OPM), called cross-acceptance, required by Public Act 10-138. The cross-acceptance process involves soliciting and potentially incorporating the priorities and perspectives of municipalities, regional planning organizations, state agencies, advocacy groups and the public into the plan. In the public outreach by OPM in advance of issuing the final 2013-2018 POCD, a heavy emphasis was placed on input from municipalities.

This process is informed by the development of plans of conservation and development at the municipal and regional levels, pursuant CGS Sec. 8-23 and 8-35a, which require municipalities and regional planning organizations to update plans of conservation and development every ten years in order to be eligible for discretionary state funding in excess of \$200,000.

The POCD does not contain any specific fair housing goals or objectives.

- 5. CGS Sec. 8-37bb:** This statute requires CHFA to annually,

...document the efforts of the agency in promoting fair housing choice and racial and economic integration and shall include data on the racial composition of the occupants and persons on the

waiting list of each housing project which is assisted under any housing program established by the general statutes or special act or which is supervised by the agency.

Each report must also, “analyze the efforts, and the results of such efforts, of each agency in promoting fair housing choice and racial and economic integration.”

6. C GS Sec. 8-37qqq(A)(4)(b)(viii): This statute requires as part of DOH annual report,

[A] summary of the department’s efforts in promoting fair housing choice and racial and economic integration, including data on the racial composition of the occupants and persons on the waiting list of each housing project that is assisted under any housing program established by the general statutes or a special act or that is supervised by the department...



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