

Housing Data Collection to Promote Fair Housing: A Proposed Framework

Prepared by Open Communities Alliance for the Data and Planning Subcommittees of the Fair Housing Working Group

Framework. Under both state and federal law Connecticut housing agencies are obligated to “affirmatively promote fair housing choice and racial and economic integration in all programs” or “affirmatively further fair housing” in the programs they administer or supervise.¹ Without a solid understanding of the location and characteristics of the existing subsidized housing stock, Connecticut state agencies cannot comply with these mandates. The notion of affirmatively furthering fair housing with regard to government-subsidized housing units is premised on:

- (1) Understanding the extent to which historic and contemporary government decisions placed disproportionately subsidized housing in high poverty neighborhoods of color and
- (2) Counteracting segregating subsidized housing placement patterns moving forward.

Much Data is Already Collected. To a large extent, the state has already collected the data needed to assess the locations of its current and past subsidized housing investments. The questions now become:

- (1) What additional information needs to be collected?
- (2) How can we organize the information we have in a useful form?
- (3) How do we measure progress on affirmatively furthering fair housing?

Essential Elements of Fair Housing Data Collection

The elements needed for a competent fair housing accountability framework include:

- Tracking current and future housing need;
- Assessing existing housing resources;
- Setting measurable goals, and
- Identifying a process for assessing and reporting on progress towards goals.

(1) Current and Future Housing Need: Assessment of the existing and projected need for housing at various income levels, with particular focus on understanding the needs of historically disenfranchised groups including:

¹ CGS Sec. 8-37cc requires the Department of Housing and the Connecticut Housing Finance Authority to affirmatively further fair housing. 42 USC 3608(e)(5), requires recipients of certain HUD funds, including the Community Development Grant program and HOME program funds, to affirmatively further fair housing. This applies to all state agencies and must guide the state’s oversight of zoning.

- a. Families with children (noting the need of families of varying sizes);
- b. Single-parent households (noting need based on the type of single-parent – mother, father, other family member, or other caregiver);
- c. Households with a member with a mobility challenges;
- d. Households needing supportive housing, and
- e. Households of color.

(2) Existing Housing Resources: The state needs a detailed assessment of existing housing resources. This assessment should include an inventory of both existing physical units of subsidized housing and tenant-based vouchers or other resources that are attached to tenant households. For each type of resource, the following information is needed:

- a. Physical Units of Subsidized Housing
 - i. Development name and contact information;
 - ii. Developer name and contact information;
 - iii. Developer for profit v. non-profit status;
 - iv. Management company name and contact information;
 - v. Management company for profit v. non-profit status;
 - vi. Number of units by census tract;
 - vii. Targeting requirements (percentage of units dedicated to various income requirements);
 - viii. Unit population restrictions (elderly, supportive, veterans, people with disabilities, unrestricted);;
 - ix. Number of bedrooms in each unit
 - x. Financing characteristics (sources of financing and amounts, including specifics on government funding programs);
 - xi. Date of first occupancy;
 - xii. Date of subsidy expiration;
 - xiii. Administering government entity (municipality, housing authority, state, federal agency);
 - xiv. Owning entity (private non-profit, private for profit, municipality, housing authority, state, federal agency);
 - xv. Type of subsidy investment – new construction v. rehabilitation;
 - xvi. Displacement plan – percentage of tenants by income level in original development v. percentage in new development;
 - xvii. Tenant characteristics by race and ethnicity;
 - xviii. Tenant characteristics by single-parent households (noting the need based on the type of single-parent – mother, father, other family member, or other caregiver);
 - xix. Link to most recently produced affirmative marketing plan;
 - xx. Type of occupancy (homeownership v. rental v. co-op);
 - xxi. Occupancy by holders of government housing subsidies in targeted and market rate units, designated by tenant-based v. project-based subsidy, and

xxii. PILOT and tax abatement status.

b. Tenant-Based Government Housing Subsidies

- i. Family composition (number of parents or guardians, number of children);
- ii. Household ages for parents and children;
- iii. Tenant characteristics by single-parent households (noting the need based on the type of single-parent – mother, father, other family member, or other caregiver);
- iv. Presence of a person in the household with a disability, specifically noting if any household members experience mobility challenges;
- v. Race and ethnicity;
- vi. Income;
- vii. Location by census tract;
- viii. Rent and tenant portion;
- ix. Utilities;
- x. Units in development, and
- xi. Number of bedrooms of each unit

(3) Goals: Every five years, as part of the state’s Consolidated Plan required pursuant to CGS Sec. 8-37t, the state should identify set of numerical goals demonstrating conformance with the obligation to affirmatively further fair housing. These include:

- a. Numerical goals, using “opportunity mapping” designations as defined by CGS Sec. 8-348(e)(5), for locating government subsidized housing in a manner that permits fair housing choice and brings statewide geographic balance to the location of subsidized units.
- b. Estimates by region of the number of affordable housing units at varying income levels and household compositions needed to meet the state’s affordable housing needs.

(4) Assessment and Reporting: The state should report on progress made towards these goals in the annual action plan outlined as part of the Consolidated Plan process. The annual plan shall be adjusted to embrace new strategies and policies designed to respond to progress, or lack thereof, on fair housing goals.