



Support Basic Housing Data Transparency to Promote Housing Choice!

Summary

For decades the state of Connecticut has invested in subsidized housing in a manner that promotes segregation and spurs disinvestment in communities of color. Connecticut is publicly committed and legally obligated to affirmatively further fair housing—that is, to consciously work to reverse government-sponsored segregation. To fulfill this promise, the state needs accurate data in order to:

- Analyze current obstacles to housing choice,
- Develop a detailed plan to remove those barriers, and
- Regularly report on the state’s progress in meeting its goals.

Unfortunately, a more meaningful federal obligation to report these data was suspended in January 2018 by the Trump administration. Despite this, a collection a reporting obligation remains under state and federal law, but these can be strengthened to be made more meaningful.

Connecticut needs better data transparency to progress on its fair housing commitments.

- Under the federal Fair Housing Act of 1968 and related state law, Connecticut is required to affirmatively further fair housing. The state has committed to consciously work to reverse decades of government programs that intentionally segregated us by race and ethnicity. To fulfill this obligation, the state must analyze current barriers to housing choice, develop a plan to remove those obstacles, and regularly report on its progress toward reducing segregation and promoting inclusivity. This obligation was strengthened during the Obama administration to include more formalized and federally reviewed reporting. On January 2, 2018, the Trump administration suspended implementation of the improved system.
- Better information is crucial to each stage of this process. The state must be able to accurately assess current housing supply and demand, predict future trends, and evaluate the successes of various interventions.

Existing federal and state law and regulations that *already* require CT to collect most necessary data are not producing helpful analyses.

State obligations include:

- **CGS Sec. 8-37bb** requires an annual report on fair housing choice and racial and economic integration. In this report, the Connecticut Housing Finance Authority catalogs new affordable housing construction, outlines the demographics of tenants in state affordable housing programs, reports demand among potential tenants, and sets goals for future progress. However, the data produced does not allow meaningful analysis.
- **CGS Sec. 8-37s** requires the Department of Housing to “monitor the progress of the public and private sector toward meeting housing needs.”
- **CGS Sec. 8-37ff** requires that the Department of Housing “develop and maintain a comprehensive inventory of all assisted housing.” This report, known as the Affordable Housing Appeals List, annually collects town-reported lists of deed-restricted housing, data on government subsidy, information on CHFA and U.S. Department of Agriculture-supported mortgages, and locations of tenant-based vouchers.
- **CGS Sec. 8-37qqq(A)(4)(b)(viii)** requires the Department of Housing’s annual report include information on the racial composition of both occupants and those on the waiting list for each housing project supervised by the state.

Questions? See <http://www.ctoca.org> - 2019 Policy Priorities

Existing obligations do not effectively work together to generate usable data and meaningful goals.

Connecticut is *already* obligated to collect much of the raw data needed to meaningfully plan for fair housing. But these requirements have created overlaps and gaps, and are missing key data about demographics and the type of housing available. As a result, truly usable data are not available to the public. By reconceiving these existing commitments, Connecticut can develop a results-based approach to fair housing data collection without imposing significant new requirements for state agencies.

Current reporting practices do not produce data in the form most usable for truly assessing progress on fair housing goals. For example:

- **Information is only reported at the aggregate.** DOH's Affordable Housing Appeals List only publicly reports aggregate data on the amount of subsidized housing by town. Additional details about project location, income targeting, elderly restrictions, and more are crucial to a fair housing analysis.
- **Critical information about available supply is left out.** CHFA's 8-37bb report does not include information on bedroom counts—a particularly important metric to assess whether family-appropriate units are being built. It also does not set forth meaningful goals, conduct a comprehensive fair housing assessment of data, or report on progress made over time.
- **Need and supply are never connected.** DOH's Consolidated Plan identifies populations having a disproportionate need for affordable housing, but does not connect specific housing unit numbers to that need or provide specific geographic goals for development.
- **Only non-quantifiable goals are set.** The most recent 2015-2019 Consolidated Plan sets a number of broad objectives, but they are not accompanied by specific numerical targets that would allow the state to measure progress accurately. The 2015 Analysis of Impediments to Fair Housing Choice similarly does not set numerical goals—even as it named encouraging “the collection and analysis of data to determine if the State is meeting its goals to affirmatively further fair housing” as one of its broad recommendations.

Solution

Open Communities Alliance recommends that, in light of the federal abrogation of a meaningful fair housing data collection regime, Connecticut voluntarily adopt the original federal requirements for reporting state-level data to help identify barriers to fair housing, set meaningful, measurable goals for overcoming them, and measure results.

At a practical level, this means publicly producing data on the state's efforts to promote integration, including developing regional fair housing allocation goals, assessing the location of government-funded developments and tenant- and project-based subsidies; analyzing these locations in terms of racial demographics and access to opportunity; and setting measurable goals for expanding housing choice and measuring outcomes. A logical place to do this is in the HUD-mandated Consolidated Plan, which is due every five years, and the Action Plans the state submits to HUD on an annual basis.

Federal obligations include:

- **24 CFR Part 91** mandates that jurisdictions receiving HUD funding produce a number of reports on housing need and the demographics of program participants:
 - **Consolidated Plan**, which DOH produces every five years, gathers data on housing needs by category of family and available resources, and sets goals for production of new housing to meet increased need.
 - **Annual Action Plans** detail how the Department of Housing plans to execute the goals of each Consolidated Plan.
 - **Consolidated Annual Performance and Evaluation Reports (CAPERs)** are periodic reports to HUD outlining activities undertaken with HUD funding through the Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Emergency Solutions Grants (ESG), and Housing Opportunities for Persons with AIDS Program (HOPWA).
 - In its **Assessment of Fair Housing**, Connecticut must report to HUD on patterns of integration and segregation; racially or ethnically concentrated areas of poverty; disparities in access to opportunity; and disproportionate housing needs.