

Community Housing Improvement Strategy

Overview

Because new 2000 Census information is now available, OHCP has decided to require, starting in FY 2004, that all communities prepare a new CHIS. OHCP has revised the CHIS so that it has a more consistent format and requires more specific information on needs, which must be the basis for strategies. The new format is intended to serve much more as a basis for preparing the CHIP applications, and needs and strategies contained in the CHIS must clearly translate into activities proposed in the CHIP funding applications, or other housing initiatives that address identified needs. Once a community's CHIS is approved, it will enable the community to submit applications for the ensuing five year period. CHIP grant applications will be reviewed more on the basis of performance and capacity, rather than on a competitive basis, with consistency with the CHIS being one of the performance criteria.

The Community Housing Improvement Strategy or CHIS is intended to be a comprehensive analysis of housing needs and a statement of the various strategies that the community will follow in addressing those needs, including designing and implementing its Community Housing Improvement Program (CHIP). Although the Community Housing Improvement Strategy (CHIS) must be done to apply for funding through the Community Housing Improvement Program (CHIP), the CHIS is not intended to serve solely as the basis or rationale for CHIP activities, but as a basis for a comprehensive approach to housing issues. Because the CHIP is merely one of many resources that may be employed to address local housing needs, a comprehensive analysis of the community's housing needs and issues is first necessary in order to determine the most effective use of CHIP funds, in conjunction with other resources.

While it is certainly true that housing needs far exceed the available resources, this fact also means that it is even more important that the limited available resources be spent on activities that will have the greatest impact on a particular type of need.

To obtain a comprehensive understanding of housing needs, the entire housing market must be considered, but the main focus of the CHIS is on the issues where public intervention is warranted. Any gaps in the housing market or inventory, or factors affecting the housing market, especially those that affect lower-income persons, should be identified and addressed if possible. Obviously this would include direct factors such as age and condition of the existing housing stock, but would also include indirect factors such as those contributing to decline of a neighborhood, which may contribute to further neglect or abandonment of the housing stock.

Review and Application of the CHIS

The CHIS will be reviewed by OHCP based on the criteria below. If it is determined that the CHIS does not meet the basic criteria, it will be returned to the community for revision or correction.

- Providing required tables, with complete and correct information
- Performing a thorough analysis and identification of needs
- Proposing appropriate and reasonable strategies relative to identified needs

The CHIS may be revised if necessary, but not more than once annually. Wholesale and constant revisions are not encouraged and would suggest that the CHIS was not done properly, and may need to be redone. The CHIS will be used to determine whether activities proposed in a CHIP application are reasonable relative to the strategies proposed in the CHIS. Needs that are not covered or strategies that are not implemented may mean that OHCP will determine that the applicant is not addressing its stated needs, which may affect funding of an application, including whether particular activities are funded or funded at the requested amount.

For the purposes of this evaluation, the focus will be on the number of households assisted, not the amount of funds expended. Also, homebuyer assistance provided to a renter household (or non-homeowner) will be considered to benefit a renter household.

Submission

The deadline date for the CHIS submission is February 6, 2004, although communities are strongly encouraged to submit it as early as possible. Submit the original and two copies of the CHIS to:

Doug Harsany
Office of Housing and Community Partnerships
24th Floor, Riffe Office Tower
77 South High Street, P.O. Box 1001
Columbus, Ohio 43216-1001

Please tab each of the major sections, number pages and record page numbers in the table of contents. Any supplementary materials can be provided as exhibits in an Appendix. All the tables and forms are in Word format, and can be filled out on a computer. Blank Data Table forms are available in Word and Excel format, and all tables and forms will be posted to OHCP's website. However, OHCP will provide completed Data Tables (or Target Area Tables) to communities upon request, in hardcopy or electronic format, so, it should be unnecessary to fill them out manually. However, all tables are being provided hardcopy format as well.

Elements of the CHIS

The CHIS has been organized into 4 main sections. CDBG Entitlement communities do not need to do Sections 2 or 3, but instead must cite specific needs references in their Consolidated Plan Strategy in completing their Table S-1s in Section 4. The Consolidated Plan Strategy must be based on 2000 Census data and submitted to OHCP, with CHIS Sections 1 and 4. Communities that will be updating their Consolidated Plan Strategy in 2004, can submit a request to OHCP to use 1990 based needs data in their CHIS for the FY 2004 CHIP only. By FY 2005, all CHISs must be based on 2000 needs data, and CHISs based on 1990 data will need to be revised accordingly and resubmitted to OHCP.

Section 1. **Community Contact Information and CHIS Planning Process**

This section requires basic information about who prepared the CHIS and will describe the planning process.

Section 2. **Community Housing Market and Inventory**

This section is an analysis and discussion of the local housing stock, housing market and demographic issues that impact the housing market. Although the basis for the CHIS is to analyze the needs of low- and moderate-income households, the status and dynamics of the overall housing market must first be understood. A great deal of the required information will be provided or made available by OHCP, including data on assisted multifamily housing projects and GIS data compatible with Maptitude 4.5 or 4.6.

Section 3. **Housing and Related Needs**

Narratives and tables in this section will summarize the particular needs issues relative to the low- and moderate-income populations in the community, and will serve as the basis for developing strategies and activities. A statement of the local Homeless Continuum of Care Strategy is also required.

Section 4. **CHIS Strategies**

These tables will describe the specific strategies that the community will pursue based on the stated needs. These needs will be summarized in a table that will serve as the basis for annual activities and CHIP applications.

Analysis of Impediments to Fair Housing Choice and Strategies

Although historically this has been performed outside of the CHIS process, OHCP believes it would be more rational to undertake such an analysis while various housing issues are being discussed and analyzed during the preparation of the CHIS. Therefore the Analysis of Impediments (AI) is now required to be done as part of the CHIS. The basic requirements for an AI appear on pages 22-26 of these guidelines instructions and Table S-3 must be completed as part of the strategy section to summarize the any identified impediments, a strategy to address those impediments, and a time table for implementation. Complete guidelines for the AI will be posted to OHCP's website. You should look over these guidelines and instructions before starting the CHIS process because many of the issues which need to be examined can be integrated into the CHIS planning process. Note that there are undoubtedly many impediments to fair housing choice, so it is expected that all communities will identify at least one impediment to fair housing choice, although 3-5 impediments should not be an unreasonable goal.

CHIS Guidelines and Required Content

Community Contact Information

Complete the CHIS cover sheet (Table G-1). Table G-1 requires that communities indicate their 2000 LMI population. Note that for counties which contain communities that are not participating in the CHIS, their populations should be excluded from this figure, and the communities must be identified on the Cover Page along with their population figures.

Table of Contents (Self-explanatory)

Section 1. Housing Advisory Committee - CHIS Planning Process
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Housing Advisory Committee and Planning Process

Required: Narrative
Table G-2

Because the CHIS is intended to be a comprehensive analysis of housing needs and issues, it is important to follow a planning process that includes all of the various sectors involved directly in housing or sectors that would provide indirect support. A Housing Advisory Committee (HAC) must be established for this purpose. The HAC should include representatives of the following sectors:

- Local Government Staff
- Public Housing Authority
- Community Action Agency
- Realtors
- Private Lender
- Fair Housing

Other members or consultative members may include:

- Community Development Staff
- Area Office on Aging
- Special Populations /Homeless Agency
- Local Human Services Agency
- Private and/or non-profit Developer
- Continuum of Care / Homeless Shelter Agency
- Other Resource Agencies

The exact composition of the Housing Advisory Committee is left to the discretion of the local program, as the situation varies greatly from community to community, and some agencies may be involved with more than one population or function. In addition, it may be difficult and even non-productive to try to assemble too large a group. Instead, you may wish to assemble a core HAC committee and meet with other service agencies separately or invite them to certain meetings. To avoid excessive meetings, information could be obtained through questionnaires or surveys and some communication with committee members might be updated via e-mail,. The important point is that the process allows for

input by all relevant agencies and organizations to create a balanced assessment of needs and an effective distribution of resources. If it is determined that this did not occur, the CHIS may have to be revised or redone.

In any case, each of the members of the HAC must be identified, and listed in **Table G-2**. In addition, provide a narrative describing the planning process, including the time and dates of each meeting, and the attendees (sign-in sheets can be included as an attachment for this requirement). The HAC must meet at least 3 times during the planning process, although generally the process likely will require more meetings than this. Possible organization of these meetings is outlined as follows:

1. Discussion of process
Presentation of the Analysis of Housing Stock, Market and Demographic Data
Present and discuss needs data and priority target populations
Identify additional housing needs and issues
2. Complete determination of needs and issues
Identify impediments to fair housing choice
Discuss strategies to address needs
3. Develop final strategy statements and 5-year Plan of Activities

The HAC is not expected to arrive at a complete consensus on every point, or even to be the final determinant of CHIS strategies and priorities. Instead it is to be used as a guide and point of reference, in order to arrive at a reasonable course of action in light of the needs and available resources. Any major objection that is raised to the CHIS should be answered with a reasoned written response.

When the CHIS is finally completed, it will need to be submitted to OHCP for approval and adopted by legislative action (resolution by city council, county commissioners). It is recommended that it first be submitted to OHCP for review, so that if any changes are needed to the CHIS, this can be accomplished before it is adopted locally. However, a local resolution adopting the CHIS will need to be passed prior to the application of CHIP funds.

Reporting/tracking

An annual report will be required to document the performance communities are making in implementing their CHIS. It is strongly suggested that a CHIS community establish an organized (and computerized) method of tracking its beneficiaries. Such a system need not be elaborate. This information can then be used to report back annually to OHCP and also to report to the local HAC, city council or make the information available to the public. An HAC meeting must be held annually to review progress on implementing the CHIS and to determine if any revisions are needed.

Section 2: Community Housing Market and Inventory

The purpose of this section is to take a comprehensive look at the local housing stock and housing market. This is an important first step and will establish the context in which the needs of lower income persons and households will be determined.

Before proceeding with the analysis of the community housing market and inventory, there are a number of specific information elements that must be provided, and which should be referenced during the analysis and subsequent discussions of needs. Each of the informational elements requiring a narrative should be labeled as they are below, followed by the narrative.

Areas of LMI and Minority Concentration

Required: Table G-3
Map

All Census Blocks or areas covered by an approved income survey that are over 51% LMI or areas of minority concentration (at a minimum areas that are over 30% minority, which is twice the minority percentage of the state as a whole) within the CHIS jurisdiction must be shown on **Table G-3** (Areas of LMI and Minority Concentration) and identified on a map included in the CHIS. These would also include any LMI areas that are currently identified as Investment Areas in a local Community Assessment and Strategy (CAS), which is required to be completed by all OHCP Formula Allocation Program grant recipients.

Often such areas are in need of revitalization, and rehabilitation of the local housing stock can be one of the important needs that must be addressed as part of revitalization strategy. Besides housing needs, other factors can contribute to neighborhood decline, such as the lack of adequate infrastructure. Some of this may have direct effects on housing, such as inadequate storm water drainage, or inadequate water or sanitary sewer lines. Other infrastructure problems may indirectly affect housing by contributing to the overall decline of the neighborhood. Such factors may include such things as poor sidewalks, streets, recreation facilities and dilapidated vacant housing units. Typically areas that have concentrations of lower income populations have both housing and infrastructure needs. With these factors in mind, discuss whether or not any of these areas would be appropriate to target for housing activities. It is suggested, but not required, that a Target Area Data sheet (**Tables T1-T29**) be prepared for any such areas that are also located in urbanized neighborhoods, to help analyze and evaluate the type and extent of housing needs. Regardless of whether or not an area has LMI or minority concentrations, if any areas that are determined to be appropriate for targeting housing assistance, a Target Area Needs Table (N-4) must be completed and a Target Area Data sheet must be prepared as part of the needs analysis. Other local survey data will also be acceptable if it adequately describes the conditions in the area and if no Census areas, such as block groups, adequately correspond to the area boundaries.

Lead-Based Paint Hazards

Required: Narrative
Table G-4
Maps as needed (Optional)

Provide an estimate of the number of units with lead based paint in your community by completing **Table G-4**. This must be completed for the entire community. It is also recommended for any areas that will be designated as target areas, as the number of units with lead hazards will be the basis for determining the number of units needing rehabilitation. Enter the data on Owners and Renters by year that structures were built, as indicated. Then multiply by the factors listed in the table, and tabulate the Owner and Renters and households. Also, examine the incidence of EBL children with respect to their location (see OHCP map data). Note that the map data shows both EBL children under 6 years of age and also those that have blood lead levels down to 10 ug/Dl, which is not considered elevated but does suggest lead hazards are present. It should also be noted that a recent study in 2003 concluded that even these low levels of lead can cause learning disabilities in children. One caution about this data is that it only shows cases of children that have been tested for lead and reported to the Ohio Department of Health, which unfortunately is not done consistently in all areas of the state, so some areas may be undercounted. Note that studies have shown that areas that have a high degree of older housing (especially pre-1950) and LMI population concentrations are also usually areas with a much higher level of EBL children. You may also want to include any data from previous housing programs or local health data on the incidence of children with lead poisoning. After gathering and reporting the data, discuss the estimated and actual blood lead data, noting areas in the community with EBL children or children at risk.

Housing in Need of Rehabilitation

Required: Narrative

In this section, provide a narrative which includes an estimate of the number of housing units by tenure that are in need of rehabilitation, along with an estimate of the number of units that are in need of rehabilitation for LMI owners and renters. Provide a source for this estimate. The CHIS requires that you discuss housing units that have various needs, including those that are in need of rehabilitation and those that are not affordable or otherwise available to lower-income households. There is quite a bit of Census information that speaks to the issue of affordability, such as persons in lower-income ranges paying more than 30 percent of their income for housing. Unfortunately there is not a designation by the Census of “substandard housing”, or “housing in need of rehabilitation”. The closest Census indicator is the figure represented by the units reported with “Selected Physical and Financial Conditions”. The figure of Selected Physical and Financial Conditions is provided in the Census data OHCP will provide to local communities and is also available by Census Tract and is part of the 2000 Census Tract Layer data in Maptitude (unfortunately this data is not available at Block Group level). This figure is defined for owner- and renter-occupied housing units as having at least one of the following conditions: (1) lacking complete plumbing facilities, (2) lacking complete kitchen facilities, (3) with 1.01 or more occupants per room, (4) selected monthly owner costs as a percentage of household income in 1999 greater than 30 percent, and (5) gross rent as a percentage of household income in 1999 greater than 30 percent. While units without complete plumbing or kitchen facilities would certainly be substandard, this amount to only a few units and is not at all indicative of typical rehabilitation needs, such as units needing roof replacements, electrical upgrading or plumbing repairs. Thus, while units with Selected Physical or Financial Conditions may reflect housing need in general, it does not adequately reflect rehabilitation needs.

However, HUD has devised a method for estimating the units affected by Lead-Based Paint, which is based upon research data, that also estimates LMI-occupied units affected by lead-based paint. Units affected by lead-based paint hazards are often older units with deteriorated paint, which is often caused by deterioration of the underlying substrate. HUD regards such elements as dangerous and in need of

abatement or mitigation, so all such units can be presumed to be in need of rehabilitation on this basis alone. However, it can also reasonably be presumed that most of these units would have other rehabilitation needs as well. Thus, the figures in the CHIS Table G-4 "Units Affected by Lead-Based Paint Hazards" is the figure that OHCP recommends communities use as the base number of units in need of rehabilitation for the purposes of the CHIS. If a community has or wishes to establish another definition, it must include this definition in the CHIS and provide a methodology, which must be statistically reasonable and based on sound assumptions. Any definition must also provide the number of LMI owner and renter units in need of rehabilitation.

While using the number of units with lead hazards or other methods will provide a figure of units needing rehabilitation for LMI households, it does not indicate which units are occupied by very-low, low- or moderate- income households. However, HUD has indicated that it expects to issue housing needs data sometime during July 2003, broken down by income categories for LMI households. While the HUD data will probably not have a much better data on rehabilitation needs, it will provide a basis for estimating how this need is distributed among the HUD income categories. When HUD issues this data, OHCP will immediately forward it to local communities.

Assisted Housing Resource Inventory

Required: Table G-5
Narrative
Maps Optional

Table G-5, Assisted Housing Inventory must be completed and included in the CHIS. This is an inventory of existing housing resources in the community, including public housing projects units, HUD-assisted housing projects, Ohio Housing Tax Credit projects, Rural Development Projects and other assisted projects. The table is basically self-explanatory. In project type, list the funding program, such as Section 8, or HUD 202, etc. OHCP can provide data on federally assisted housing projects, though this data should be checked against local sources, and revised, if needed. Communities can list projects that are not located specifically in the community if they serve the jurisdiction's population. Discuss the assisted housing resources available to the community's low-income residents and also the adequacy of the availability of these units (i.e., the location and unit size, as well as affordability issues). In addition, discuss whether there are local Section 8 rental assistance Certificates or Vouchers available and the extent to which existing (and Decent, Safe and Sanitary) rental units are available to be used with this resource.

Other Resources

Table G-6

Complete the Other Resources **Table G-6**. List any and all housing resources (i.e., agencies, programs, organizations, etc.) that can reasonably be expected to be available in the community, whether this is direct housing or supportive housing. Agencies or programs that might provide public infrastructure resources should be listed also if this kind of needs is linked with housing needs. The latter would be particularly important if public improvements are needed, such as in the case of a target area, where housing was a part of the overall resources that will be used to revitalize an area. In other cases, infrastructure may be indirectly involved in housing, such as the installation of a waterline or sanitary sewer line. Place an "X" in the Owner, Renter, or Special Needs columns, if the resource can be used for that purpose. Similarly place an "X" in the columns Supportive Services (e.g., homebuyer counseling), or Infrastructure if the resource could be used for that purpose. Should the resource be

available for some other purpose not listed, indicate this in the "Other" column and identify the possible use of these funds. This table will be referenced later in the Strategy section.

1. Community Housing Market and Inventory

A. Demographic and Socio-Economic Analysis

Required : Narrative
Community Population Data Tables 26-36
Maps as needed

Please provide a narrative that analyzes the demographic and socio-economic factors below, and other factors as warranted, noting any changes or trends during 1990-2000. The analysis must consider the entire geographic area covered by the CHIS. Much of the data that you will need for this section will be provided by OHCP upon request. Other information can be included, such as additional Census data or local information. You should cite tables and maps as needed, and may either integrate them in the text or cite them by table number and page number. In some instances, contrasting and comparing local and statewide information and trends may be useful.

How has the population changed since 1990? Is it increasing or decreasing? Even if the population has remained basically static, are there identifiable geographic shifts in the population (i.e., central city to suburb or rural areas)?

What is the composition of the population with respect to age? Are there a large percentage of elderly or young persons and how has this changed since 1990? Are the elderly or other age groups more concentrated in one area than another?

What is the composition of family and household types in the community (i.e., large number of female-headed households with children). What is the average family and households size? How and why has this changed since 1990?

What is the extent of the population with disabilities? Is this population increasing or decreasing? Generally, what are the nature of the disabilities? What proportion of these persons are elderly? How has this population changed since 1990.

What is the median household income and per capita income? What is the number of LMI persons and families/households and households below poverty level? How has this changed since 1990? Are there areas of concentration of lower income populations or minority populations within the community (refer to table G-3). You may want to integrate the discussion of income issues with the analysis and discussion of the some of the factors above.

Discuss the areas of LMI and Minority Concentration and the feasibility of designating one or more of these areas as Target Areas for the investment of housing resources as part of a neighborhood revitalization strategy.

1. Community Housing Market and Inventory

B. Housing Stock and Market Analysis

Required: Narrative
Community Housing Data Tables 1-25
Maps as needed

The community must prepare a narrative about the nature of the housing stock and market, including but not limited to the points outlined below.

Describe the basic nature of the housing inventory, including the total number of units and the percent of owner and rental units. What is the homeownership rate? Has the rate of homeownership been increasing or decreasing?

What is the age of the housing stock overall and by tenure type. Is there a concentration of older housing anywhere in the community? What is the condition of the housing stock? How many units are estimated to be in need of rehabilitation?

Discuss the changes to the local housing stock during 1990-2000. How many units have been added and lost to the housing stock, and how has this affected the type of housing inventory. Have units been added or lost in particular areas, and what is the significance of this trend?

What is the vacancy rate with respect to housing overall and owner and renter units in particular, and is this low or high? Is there evidence of any shift in the housing, such as single-family units being converted to homeowner units? If so, discuss the reasons for this.

What is the distribution of units with respect to bedroom size for owners and renters? Compare this to family size data and data on overcrowded units and discuss whether the stock is appropriate for the population, including the lower income population.

Discuss the cost of housing and particularly the percent of household income that is spent on housing. (Persons spending 30% or more of their income are considered rent burdened and 50% or more severely rent burdened by HUD) How affordable is the housing stock? Has this increased or decreased since 1990, and are there areas where housing is less affordable?

How is the private market responding to demand, especially with respect to affordable housing? What is the role of private lenders? Are there gaps in the financing of housing, especially for lower-income households? What resources (see table G-6) exist that might be applied to fill any gaps?

What are the vacancy rates in the assisted housing stock and is there a need for more affordable units? Are there rental assistance subsidies available and what is the demand for these? Where are assisted housing projects located or resources being utilized, including the distribution of rental assistance, and is there a need for affordable housing opportunities in other areas.

Section 3: Housing and Related Needs

There are three housing needs tables that are required; one for Owners, one for Renters and one for Special Needs Populations. The tables must provide a discussion that assesses and analyzes the overall needs of each of these household types within the community as a whole, although any concentration of needs should be identified. A fourth table, Target Area Needs, is provided in the event that there are specific geographic areas of housing need that need to be specially targeted for housing assistance. At this time, there is no data available that directly identifies the housing needs of low- and moderate income populations, or even the number of persons in each category, however HUD has indicated such data is in preparation and is expected to be released in July of 2003. Until such time, you will need to

rely on the Census data, local information and knowledge to prepare these tables. Note that these tables are available in Word so they can be filled out electronically. If you complete them manually, fill out the table and then provide a narrative on a separate page and reference the page numbers next to each section. The tables are relatively simple, so you can recreate them fairly easily if you wish, as long as they contain the required information in a similar format.

Owner, Renter and Special Population Needs Tables

Required: Narrative on Continuum of Care
 Tables N-1, N-2 and N-3 (Tables require narratives)

The format for all of these tables is similar, so the instructions will apply to all of them. The first thing to note is that the tables are designed to be as free form as possible, which will permit you to provide a narrative of any length, allowing for inserting of tables, maps or even photographs. The first task is to enter the name of the community and enter the LMI household information, including number and percent LMI households. Until HUD releases its tabulation of LMI housing needs, expected in July of 2003, this data is not presently available by income category by tenure, but total LMI data is available. Also, the table for Special Needs Populations, such as persons who require supportive housing (such as persons with mental, physical, and developmental disabilities) does not need to have persons categorized by income. Data for this table may be obtained from Tables 35 and 36. Below is an example of the data for LMI renters in a community called “Central City”.

Community	No. LMI Households	Pct. LMI Households	Income Category
Central City	4,000	40%	0-30% Median Income
	3,500	35%	30-50% Median Income
	2,500	25%	50-80% Median Income
	10,000	100%	Total

The next items that need to be completed, are sections 1 through 4. Each of these sections has a heading, of either Housing Preservation, Lead-Based Paint Mitigation, Affordability/Availability, and Supportive Services. You need to provide a narrative for each of these topics that describes the needs of LMI households. It is important that you enter a designation of the degree of need next to the population median income categories or the Special Needs category. These consist of four choices: S = Substantial Need, M = Moderate Need, N = Negligible or No need or NA for Not Applicable. Of course the narrative and the data must support these designations. Also, **every designation of Substantial or Moderate must eventually be addressed by a strategy and possibly an activity to address the need.** These designations can all be the same for each category or different, depending on what is concluded from the analysis of available data and other informational resources, including HAC members.

1. Housing Preservation	
S	0-30% Median Income
M	30-50% Median Income
N	50-80% Median Income
NA	Special Needs

Note that **the needs of all income groups must be discussed and analyzed in narrative form**, even if it is determined that there is little or no need. In this case, a rationale must be provided for this determination. Income groups that have similar needs can be discussed as a single group and all groups can be given the same designation, if appropriate.

The CHIS asks that the needs of special populations be analyzed as a group and discussed in Table N-3. This analysis is intended to focus on those persons who are in need of some form of assisted living facilities, and would not be covered by an analysis of owner or renter households. However, the needs analysis tables for the owner and renter households also include persons with special needs, as there are also owner and renter households that are special needs persons. These households may have particular needs that may not be adequately covered in an analysis of owner or renters as a group.

The following types of issues need to be evaluated and discussed for the respective Needs topics:

Issues to be covered in the LMI Owner (N-1) and Renter (N-2) Housing Needs Tables

1. Housing Preservation

- A. What is the need for housing preservation in the community? Discuss the number of units that are estimated to need rehabilitation. Note that OHCP considers the LMI units with lead-based paint hazards as in need of rehabilitation. Also, the Census information provides the number of units that have been identified with a Physical or Financial Condition (Community Data Table 13), which reflects housing need also, though it is based on a variety of factors, including affordability. Another indicator, are the number of units built prior to 1950, making them over 50 years old. Units without complete kitchen or plumbing can be used as an indicator but are probably far less than the total number of units needing rehabilitation.
- B. If possible, describe the occupants of housing needing rehabilitation, such as age, family type, and income. Data from previous housing rehabilitation programs can be cited, if appropriate.
- C. Based on geographic data, are there particular areas that need housing preservation activities more than others (do some areas have multiple indicators of needs such as many units built prior to 1950, many units with much lower median value, in areas with large number of LMI households)?
- D. Discuss the type of housing stock that generally will be rehabilitated, such as age, size and types of components likely to be deficient (roof, furnace, plumbing, electric, doors, windows, weatherization, etc.). Make a projection of the average cost of rehabilitation, based on these factors. Discuss the need for providing financial assistance to owners to help pay for the cost of housing preservation. To what extent can owners finance all or a portion of the housing rehabilitation work. Do area lenders offer housing rehabilitation loans, and what are the terms of such loans?
- E. Are there preservation needs other than complete housing rehabilitation, such as wells or septic systems or repair needs, and what is the extent of such needs. How significant are such needs compared to comprehensive rehabilitation needs? If one or two items are addressed in a project, how will the remaining preservation needs be addressed?

2. Lead-Based Paint Hazard Reduction

- A. Based on Table G-4, how many LMI units and percent of units are estimated to have a lead-based paint hazard?
- B. To what extent are there areas where there is a correlation of indicators, such as areas that have a large number of pre-1950 housing, LMI households, and children with Elevated Blood Lead levels (or near EBL).
- C. What are the implications of the lead-based paint hazard reduction needs with respect to the impact on housing preservation and rehabilitation activities?
- D. Discuss the extent to which the need for hazard reduction can be addressed through housing rehabilitation involving interim controls vs. abatement that addresses the specific hazardous elements in units with EBL children, which must be done by abatement contractors. What related needs exist, such as the need for trained personnel and community education and awareness.

3. Affordability/Availability

- A. Identify any affordability issues for LMI households. How many LMI households are paying more than 30 % and also more than 50% of their income for housing?
- B. Discuss the cost of housing (mortgage or gross rents and other expenses) and what is the extent to which this is affordable to low or moderate-income households?
- C. How suitable is the existing owner/rental housing stock for LMI households? Are existing units appropriate as to bedroom size in light of family size and are appropriate and affordable units available to LMI households. If LMI renter households are seeking to purchase a home, what is the availability of existing housing and financing?
- D. What is the average cost (rent) of newly constructed market-rate units and to what extent are such units affordable to low- or moderate-income households? Is there a need for additional affordable units to fill this gap?

4. Supportive Services

- A. To what extent do supportive service needs exist for homeowners (such as homebuyer counseling, or services aimed at assisting elderly owners remain in place?)
- B. Identify fair housing needs and impediments to housing choice (see IA instructions)

Issues to be covered in the Special Populations Needs (N-3) Table

The Special Populations Needs Table requires the same sections as the Owner and Renter Tables, but should be answered with respect to the housing specifically intended for special needs clients, such as assisted living housing, group homes, etc. For the purpose of the CHIS, this population will be those special needs persons that are not homeless. This would include elderly with disabilities, and persons with mental or physical disabilities. The Census information provided by OHCP contains information

on the number of persons in the community that have disabilities of various types. You can also contact local mental health or area aging offices to obtain data on special populations and their housing needs. For the most part lead-based paint will not be an issue, as it is a hazard mainly for children under 6 years of age.

Issues to be covered in the Target Area Needs Table

- Required: Target Area Needs Table N-4
- Target Area Data Table
- Target Area Map

If it has been determined that there are areas in the community that appear to need targeted housing assistance, then Table N-4 must be completed, and the Target Area shown on a map. This table must identify the type and extent of housing needs in the neighborhood. Note that this table is a bit different than the other needs tables, as it requires that the needs of owners, renters and special needs persons in the target area all be evaluated. However, the same issues need to be covered in this table as for the owner, renter and special needs tables, except that only the LMI population of the target area is considered. Generally affordability or availability of housing should focus on issues such as the vacancy of existing units in the neighborhood.

In addition, discuss any public infrastructure needs in the Target Area, if the housing needs are part of a broader need for neighborhood revitalization. Also, discuss the need for demolition and need for in-fill housing under the respective sections. Note that if you cannot complete the Target Area Needs Data table because the area is much different in size than the 2000 Census area, please note this and but at least complete the Target Area Data Tables T1, T2, T3 and T20. In lieu of Census information, other needs data should be provided insofar as possible to substantiate the need in the area.

Issues to be covered in the Homeless / Continuum of Care Narrative

- Required: Narrative

Note that there are a variety of programs and resources that address the needs of the homeless, and many agencies and organizations are involved with developing strategies and plans for providing shelter for these families and persons, and to ultimately transition them into permanent housing. It is not intended that communities who prepare a CHIS should duplicate these efforts. However, every community should have a Continuum of Care strategy in place that is a system of responding to homeless families and persons. Local housing programs should be part of this system, particularly in assisting persons or families who are in a position to transition into permanent housing. Therefore the CHIS requires a narrative statement be prepared that describes the local continuum of care system, and especially a description of how the CHIP programs will coordinate with local homeless and emergency shelter agencies to provide the appropriate assistance. Communities must continue to track homeless persons assisted with permanent housing through the CHIP to meet HUD reporting requirements.

Section 4: CHIS Strategies

As stated previously, each identified need that is “Substantial” or “Moderate”, must be followed with a Strategy Statement that addresses that need. This does not mean that the need must be addressed in full, but it should be addressed to the extent that resources permit and in a magnitude similar to the proportion of the overall need in the community. Also, the focus will be placed on the number of households benefiting, not dollar resources committed or projected. In addition, all needs do not have

to be addressed (and likely cannot be addressed) through the Community Housing Improvement Program alone. For instance, if one of the identified needs is that many rental units are not affordable to households with incomes below 50% of median income, this need might already be addressed by the housing authority, within the limits of available resources, by operating a Section 8 certificate or voucher program. Even this resource may not be sufficient considering the magnitude of need, so perhaps additional strategies may be devised, such as support for projects that increase the supply of affordable rental housing, whether or not they directly involve CHIP activities.

Strategy Statement Table(s) S-1

The Strategy Statement table is provided in Word format, so it can be filled out in electronic format. The first step is to assign a number in the block on the form for each Strategy Statement, beginning with “1” and then number each additional statement consecutively. On the Strategy Statement table is a box 2, labeled “Need Reference”. This refers to the Needs Table and Section that identified this need.

Need Reference >	Table No.	Section No.
	N-2	3

In the above case, the Strategy Statement is referring to Table 2, which is the Renter Housing Need table, and also to Section 3, which is “Affordability/Availability” section. Therefore this statement will propose a strategy on providing new housing opportunities for renters. **It is critical that a clear link is established between an identified need and a proposed strategy.**

Part 3 of the Strategy Statement you need to identify which tenure type of beneficiary is being addressed, which in this case is renters. (Note that the concept of beneficiaries means a household who is assisted by the activity, whether this is a person or a family or a non-family.) Next you need to indicate which income categories the strategy will address by assigning a “Priority”. (If you do not assign a priority, it will mean that the strategy does not apply to that income group). To assign a priority, enter the letters “P” for primary or “S” for secondary. The reason for assigning a priority is that the activity you are proposing may be primarily intended to address a certain income group, but persons in another income group might be eligible too, but are not the primary target population for the strategy.

Check "X"	Tenure Type
	Owners
X	Renters
	Special Needs

Priority	Income Category
P	Households 50-80% Median Income
S	Households 30-50% Median Income
	Households 0-30% Median Income
	Special Needs Households/Persons

For example, you may propose a homebuyer assistance strategy, which will have as its intended target population households in the 50-80% of median income category, because lower income groups typically do not have sufficient incomes to support a monthly housing payment, but the program may consider a household as low as 40% of median income. Thus, the 30-50% income group is considered a “secondary” priority.

In part 4 of the Strategy table, list the specific Proposed Activity or Activities to implement this strategy. Assuming that this strategy proposes to address a need that was identified in relation to housing Affordability/Availability. The strategy proposes a Homebuyer Downpayment Assistance activity that

will assist 10 households per year over a 5-year period, for a total of 50 households, which will be augmented with local housing program income to assist 20 more households. In addition, the area Public Housing Authority has received a HUD HOPE grant that will be also be used for Homebuyer assistance that will serve 40 public housing tenants, but will not involve the CHIP.

Primary

Activit(ies)	Projected Households Benefiting				Strategy Table Activity Number
	Total	CHIP	Other	Other Source	
Homebuyer Assistance	70	50	20	Local Program Income	2
Homebuyer Assistance	40		40	PHA HOPE Grant	

Note that the last column is Titled Strategy Table Activity Number. This number is the number of the activity listed in the Strategy Summary Table, which will be discussed later.

Next make a estimate of the phasing of households benefiting over the five-year CHIS period. You do not have to do an activity in all three years but the rational for phasing must be explained.

5. Proposed Strategy Implementation Schedule:

1	2	3	4	5
10	15	15	15	15

Besides the Homebuyer Assistance activity, assume that this community also identified a need for Housing Preservation of Owner-Occupied Housing in the community. Part of the need for housing preservation needs in the community occurs in a neighborhood that has a high proportion of LMI households. There are also other needs in the neighborhood, especially for Storm Drainage, a new waterline and sidewalks. This area is also an Investment Area identified in the CAS.

As a result of these two needs determinations, the community proposes two separate strategies. The first strategy proposed is for owner-occupied housing, and prioritizes households below 50% of median income, with households in the 50-80% of median income being a secondary priority. The strategy proposes to undertake an activity to rehabilitate 125 owner-occupied housing units. Weatherization assistance, from non-CHIP sources, is projected to be provided for 50 of the households. The second strategy proposed by the community is a neighborhood revitalization program in a target area, which has both housing and infrastructure needs.

Tables for both of these strategies, which are numbered Strategy 1 and 2, appear on the following pages. Note that a narrative would be required for both strategies, which would explain how each of these activities would address the identified housing preservation need and how assistance will reach the intended beneficiaries, in as much detail as possible.

For all strategies, discuss the rationale for the timing and phasing of the various activities proposed during the five-year period. For instance, in the Target Area example, the waterline installation may need to be scheduled early in the process, if households subsequently will be tapped into the line, which may entail plumbing issues. Although communities will be given significant latitude in phasing the implementation of their activities, it must be based on a sound rationale. For instance, in the example of the proposed homebuyer activity, it would make little sense to try to accomplish that entire activity in a

Strategy Statement

1. Number > 2

2. Need Reference >

Table No. Section No.

N-1	1

3. Target Population Tables:

Enter "X"	Tenure Type
X	Owners
	Renters
	Special Needs

Priority	Income Category
S	Households 50-80% Median Income
P	Households 30-50% Median Income
P	Households 0-30% Median Income
P	Special Needs Households/Persons

4. Proposed Activities

Primary

Activit(ies)	Projected Households Benefiting				Strategy Summary Activity No.
	Total	CHIP	Other	Other Source	
Owner Housing. Rehab	125	125	50	Weatherization Program	1

Secondary/Supportive

Activit(ies)	Projected Households Benefiting				Strategy Summary Activity No.
	Total	CHIP	Other	Other Source	

5. Proposed Strategy Implementation Schedule:

1	2	3	4	5

6. Strategy Narrative:

Strategy Statement

1. Number > **3**

2. Need Reference >

Table No. Section No.

N-4	1,2,6

3. Target Population Tables:

Enter "X"	Tenure Type
X	Owners
	Renters
	Special Needs

Priority	Income Category
S	Households 50-80% Median Income
P	Households 30-50% Median Income
P	Households 0-30% Median Income
P	Special Needs Households/Persons

4. Proposed Activities

Primary

Activit(ies)	Projected Households Benefiting				Strategy Summary Activity No.
	Total	CHIP	Other	Other Source	
Owner Housing Rehab.	25	25	10	Weatherization Program	1

Secondary/Supportive

Activit(ies)	Projected Households Benefiting				Strategy Summary Activity No.
	Total	CHIP	Other	Other Source	
Waterline Replacement	100		100	Formula Allocation Program	13
Storm water Drainage	100		100	Formula Allocation Program	14
Sidewalks	100		100	Local Community Funds	15

5. Proposed Strategy Implementation Schedule:

1	2	3	4	5

6. Strategy Narrative:

single year. On the other hand the proposed Target Area activity could reasonably be accomplished in a two-year timeframe.

The strategy statement narrative should not be limited to just describing the housing activity or the secondary activities, but should also discuss the entire context of the activity relative to the neighborhood revitalization goals. For example, a neighborhood meeting and/or direct mailing to target area residents may be important to obtain support and participation for the project. These kinds of issues should also be discussed.

Note: Any infrastructure needs in a target area will be expected to be coordinated with the Formula Program resources and the CAS planning process to the maximum extent possible, and discuss such coordination in the strategy narrative.

Finally, it is acceptable to address an identified need through proposing a strategy which cites only resources other than the CHIP. For instance, it may be determined that there is a need for more affordable rental housing units. A viable strategy may be that the community will support the development of an affordable housing project in the community to address this need. Such support does not necessarily mean only financial support. If this approach is used, there must be a realistic strategy for this to be achieved and the discussion of timing needs to include a schedule for implementing such a project with milestones that will provide a basis for measuring progress towards implementing the proposed activity.

If you are completing the Strategy forms electronically, you can type the information into the tables and into the narrative section and just continue on to additional pages. If you are filling out the table manually, you can attach additional pages as needed to accommodate the narrative.

The Strategy Summary (Table S-2)

After completing all of the Strategies, the final step is to post them to the Strategy Summary Table. It is only necessary to list activities in the Strategy Summary Table that are proposed to be funded all or in part from CHIP funds. (Note that the Activity Number in the Strategy Summary must correspond to the number in the last column of the Strategy Statement, Section 4, "Strategy Summary Activity Number.") For such activities list the total number of households that are expected to benefit from the activity, including any other resources. An example of a completed Strategy Summary Table is shown on page 21. Notice that the Owner Rehab activity is actually the combined result of two strategies, one involving owner rehab throughout the community, and one that involves owner rehab in a target area. Only a single type of activity should ever appear on the Strategy Summary Table, even if it is the combined result of ten Strategy Statements.

Do not include activities on the Strategy Summary that are expected to be funded only by other resources, and are not envisioned to work in conjunction with CHIP activities. Why list such activities at all? It may be that another agency, perhaps a non-profit, is proposing to work on a rental housing project that will address a need cited in the CHIS. This will mean that, to some extent, this need will be addressed and the local community will not have to devote many (or any) additional resources to that need. For Target Area activities, include all activities associated with the area, including secondary activities if CHIP housing resources are proposed to be committed to the area. Finally, make a projection of the number of households that will be assisted by an activity, each year of the five-year duration of the CHIS.

Be advised that it is not necessary to post every activity proposed as part of a Strategy Statement to the Strategy Summary. Assume a community is planning on submitting a Community Distress Program application to revitalize an area that has almost all owner-occupied housing. The need exists, so it should be identified, and the strategy would be very sensible, so it should be included in the CHIS. However, do not put anything in the project phasing part of table S-1 and then explain in the narrative that the strategy is contingent upon the funding of the Distress Program application. Meanwhile, the community can continue to address other owner housing preservation needs, but can easily activate the target area strategy when, and if, the Distress Program application is funded.

Analysis of Impediments (Table S-3)

Next, complete the Analysis of Impediments, Table S-3. Completing this table is very straightforward, particularly if the AI was integrated into the overall CHIS planning process. It is highly unlikely that a thorough analysis of owner and renter housing would not identify at least a few impediments or systems that could be improved. The next step is to devise strategies and list them in the second column in the table. Then identify a basic timetable for implementing these strategies, and record it in the third column.

Table S-2
Strategy Summary

Community : **Example**

No.	Activity Name	Projected Number Households Benefiting													
		No. Owner Hshlds	No. Renter Hshlds	No. Special Needs	No. Homeless	Total	Target Area	Target Area	Target Area	Target Area	Target Area				
							#1	#	#	#	#				
1	Hombuyer Assistance		50			50					5	10	15	10	10
2	Owner Housing Rehabilitation	125				125	25				25	25	25	25	25
3															
4															
5															
6															
7															
8															
9															
10															
11															
12															
	Subtotals	125	50			175	25				30	35	40	35	35
	Secondary Activities														
13	Waterline						100								
14	Storm Drainage						100								
15	Sidewalks						100								
16															
17															
18															
19															
20															
	Totals =	125	50			175	300				30	35	40	35	35
	Percent =	71%	29%			100%									

Office of Housing and Community Partnerships (OHCP)

Identifying Impediments to Fair Housing Choice and Conducting an Analysis

REQUIREMENT:

Formula Allocation Program and Community Housing Improvement Program grantees are required to develop an analysis of impediments (AI) which identifies existing conditions or barriers that limit housing choice within the community.

The Analysis of Impediments should:

Present a clear analysis of the information collected;

Identify any changes needed to correct or overcome impediments identified in governmental policies, real estate and lending institutions, zoning restrictions, etc.;

Include a specific plan of action; and

Include a timetable or schedule for the resolution of the identified problems or impediments.

Grantees are encouraged to have an on-going process for identifying all fair housing concerns and problems and for analyzing their efforts in mitigating or remedying problems.

The local analysis of impediments should be updated annually. A copy of the updated analysis should be included in the grantee program files.

GENERAL:

Title VIII of the Civil Rights Act of 1968 made it unlawful to discriminate in any aspect relating to the sale, rental, or financing of dwellings or in the provision of brokerage services or facilities in connection with the sale or rental of a dwelling because of (five {5} basis) 1) race, 2) color, 3) religion, 4) national origin and 5) sex. The Fair Housing Act Amendments of 1988 (Title VII of the Civil Rights Act of 1968, as amended) revised Title VIII (the Fair Housing Act) to extend protection to 1) families with children and 2) persons with handicaps. Application of the Fair Housing Act is not limited to situations when Federal funds are used. It provides for fair housing throughout the United States (private and public).

The Housing and Community Development Act, as amended and the State Community Development Block Grant Program (CDBG) final regulations establish performance standards for affirmatively furthering fair housing which apply to the state and its grantees.

Both Community Development Block Grant and Home Investment Partnership (HOME) program grantees are required to affirmatively further fair housing. The state of Ohio requires grantees to each conduct a fair housing program with standard features. The fair housing program standards are listed in Attachment I of the Ohio Community Development Block Grant Small Cities Administrative Plan (State Plan).

As part of its standard program, the state requires each grantee to conduct an analysis of the impediments to fair housing choice. Small Cities grantees were required to conduct their first analysis during the FY'85 program year. All grantees should have updated their analysis in 1990, as required.

What is FAIR HOUSING CHOICE?

The ability of persons regardless of race color, religion, sex handicap, familial status, national origin, of similar income levels to have available to them the same housing choices.

What IMPEDES HOUSING CHOICE?

Housing choice is impeded when actions, omissions, or decisions are taken 1) to restrict a person's choice of housing because of the person's race, color, religion, sex, handicap, national origin, or familial status, 2) or certain residential dwellings are not made available to persons because of race, color, religion, sex, handicap, familial status, or national origin.

What is UNLAWFUL?

The kinds of housing discrimination prohibited because of race, color, religion, sex, or national origin are: (References - the Fair Housing Act, as amended; Effective March 12, 1989).

1. Refusal to sell or rent; {Section 804 (a)}
2. Discrimination in terms, conditions, or privileges of sale or rental, or in the provision of services or facilities in connection therewith; {Section 804 (b)}
3. Preference, limitation, or discrimination in advertising with respect to sale or rental of a dwelling unit; {Section 804 (c)}
4. False representation regarding availability of a dwelling units for inspection, sale, or rental when such dwelling is in fact available; {Section 804 (d)}
5. Blockbusting. For profit, to induce or attempt to induce any person to sell or rent any dwelling by representations regarding the entry or prospective entry into the neighborhood of a person or persons of a particular race, color, religion, sex, handicap, familial status, or national origin; {Section 804 (e)}
6. To discriminate in the sale or rental, or to otherwise make unavailable or deny, a dwelling to any buyer or renter because of a handicap of that buyer or renter, person residing in or intending to reside in that dwelling after it is sold, rented, or made available to, or any person associated with that buyer or renter; {Section 804 (f) (1)}
7. To discriminate against any person in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provision of services or facilities in connection with such dwelling, because of handicap. This includes: 1) refusal to permit reasonable

modifications, 2) refusal to make reasonable accommodation in rules, practices, or services when necessary to afford the person equal opportunity to use and enjoy the dwelling, 3) in connection with the design and construction of covered multi-family dwellings, a failure to design and construct those dwellings in such a manner that the public and common use portions of such dwellings are readily accessible and usable by handicapped persons, all doors are designed to allow passage into and within all premises within such dwellings are sufficiently wide to allow passage by handicapped person in wheelchairs, and all premises within such dwellings contain the following features of adaptive design a) an accessible route into and through the dwelling, b) light switches, electrical outlets, thermostats, and other environmental controls in accessible locations, c) reinforcements in bathroom walls to allow later installation of grab bars; and d) usable kitchens and bathrooms such that an individual in a wheelchair can maneuver about the space. {Section 804 (f) (2)}

8. Discrimination in making or purchasing loans for residential real property purchases, construction, improvement, repair, or maintenance of a dwelling; {Section 805 (b) (1)}
9. Discrimination in appraising of residential real property by taking into consideration the factors of race, religion, national origin, sex, handicap, or familial status; {Section 805 (b) (2)}
10. Discrimination in provision of brokerage services by denying any person access to, membership, or participation in any multiple-listing service, real estate broker's organization or service, organization, or facility; {Section 806}

What should be ANALYZED?

Eight (8) AREAS SHOULD BE ANALYZED for UNLAWFUL PRACTICES, ACTIONS, DECISIONS, OR OMISSIONS that result in restricting or limiting housing choice for persons of similar income levels, regardless of race, color, sex, national origin, religion, familial status, or handicap:

1. Provision of financing assistance for residential real property purchases, construction, improvements, repair, or maintenance of a dwelling;
2. Terms, conditions, or privileges of sale or rental of a dwelling;
3. Advertising with respect to sale or rental of housing;
4. Realtors practices;
5. Appraisal practices;
6. Access to any multiple-listing service, real estate brokers' organization, or facility relating to the business of selling or renting dwellings;
7. Administrative policies concerning community development and housing activities, site section policies, local code requirements, local zoning requirements, and other local housing construction requirements;
8. Results of actions undertaken by the recipient to remedy problems identified by the analysis of the above seven (7) areas or identified in a court suit or finding of noncompliance by HUD, OCRC, or OHCP;

How do I BEGIN? (This should be an on-going process and is the basis for analysis of all areas.)

1. Obtain demographic data and income characteristics on your community from the 1990 Census, the local Comprehensive Homeless Assistance Plan (if applicable), and the local Comprehensive Housing Improvement Strategy (CHIS) (if applicable).
2. Obtain statistics on the number of housing units by type of housing (multifamily, single family, owner-occupied, rental, shelters, etc.), cost of construction, cost of rehabilitation, cost of acquisition of standard and substandard housing, number of assisted housing, condition of housing, and vacancy rates by type of housing, etc.
3. On maps, locate types of housing (groups homes, independent, apartment complexes, etc.), racial housing patterns, housing costs, areas of high vacancy, industrial and commercial areas, major employers, financial institutions (main and branch offices), etc.

RECOMMENDED CONTENTS OF ANALYSIS OF IMPEDIMENTS

1. Identification of Fair Housing concerns and problems
2. Demographic data and income characteristics
3. Employment and transportation profile
4. Housing profile
5. Maps
6. Identification of impediments to fair housing choice
7. Identification and description of existing programs, services, and activities that assist in the provision of fair housing
8. Identification of data sources

1. IDENTIFICATION OF FAIR HOUSING CONCERNS AND PROBLEMS

A. Research and relevant zoning and building code policies and practices for any impact on the achievement of fair housing choice. Document your findings.

B. Research the local financial institutions'

- i. Application procedures
- ii. Approval procedures for loans
- iii. Factors used in home appraisals
- iv. Advertisements
- v. Locations of mortgage loan approvals
- vi. Community Reinvestment Act audits

Document your research.

C. Research local realtors'

- i. Advertisements
- ii. Application for rental units
- iii. Listings in the multiple listing services

2. DEMOGRAPHIC DATA AND INCOME CHARACTERISTICS

3. EMPLOYMENT AND TRANSPORTATION PROFILE

4. HOUSING PROFILE

5. MAPS

6. IDENTIFICATION OF IMPEDIMENTS TO FAIR HOUSING CHOICE

7. IDENTIFICATION AND DESCRIPTION OF EXISTING PROGRAMS, SERVICES, AND ACTIVITIES THAT ASSIST IN THE PROVISION OF FAIR HOUSING

8. IDENTIFICATION OF DATA SOURCES