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County Executive

**PRINCE GEORGE'S COUNTY
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT**

**REQUEST FOR PROPOSALS
NO. 2019-01**

Analysis of Impediments to Fair Housing Choice (AI)

ISSUANCE DATE: March 21, 2019

PROPOSAL CLOSING: April 19, 2019, 5:00 p.m. EST

**Contact: Ms. Adedamola George, Esq.
Senior Compliance Officer**

**Department of Housing and Community Development
301-883-5551**

WARNING: *Prospective applicants who have received this document from a source other than the Issuing Office should immediately contact the Issuing Office and provide their name and mailing address in order that amendments to the RFP or other communications can be sent to them. Any prospective applicant who fails to notify the Issuing Office of this information assumes complete responsibility in the event that they do not receive communications from the Issuing Office prior to the closing date.*

This document is available from the Prince George's County Department of Housing and Community Development's webpage at <http://www.princegeorgescountymd.gov/sites/dhcd>.



**REQUEST FOR PROPOSALS
PRINCE GEORGE'S COUNTY DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT**

RFP NO.: 2019-01

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TABLE OF CONTENTS

SECTION I: INTRODUCTION

- 1.1. Purpose
- 1.2. Background
- 1.3. Eligible Applicants
- 1.4. Application Closing Date
- 1.5. Withdrawals of Modifications of Proposals
- 1.6. Questions and Inquiries
- 1.7. Proposal Acceptance
- 1.8. Duration of Proposal Offer
- 1.9. Notice to Applicants
- 1.10. Indemnity

SECTION II: GENERAL TERMS AND CONDITIONS

- 2.1. Economy of Preparation/Incurred Expenses
- 2.2. Addenda to the Request for Applications
- 2.3. Oral Presentations
- 2.4. Confidentiality/Proprietary Information
- 2.5. Allowance of In-House Work
- 2.6. Formation of Agreement/Contract with Successful Contractor
- 2.7. Period of Contract
- 2.8. Termination for Convenience
- 2.9. Affidavits, Certifications and Affirmation

SECTION III: SCOPE OF PROGRAM FUNCTIONS AND WORK

- 3.1. Scope of Program Functions
- 3.2. Scope of Work

SECTION IV: SCHEDULE OF DELIVERABLES

SECTION V: PROPOSAL CONTENTS

- 5.1 Proposal Format Outline
- 5.2 Application Affidavit
- 5.3 Organizational Structure, Capacity, and Financial Strength
- 5.4 Processing Timeline
- 5.5 Response and Documentation of Qualifications
- 5.6 Fee for Services Cost Schedule
- 5.7 Certificate of Insurance Requirements
- 5.8 Exceptions or Restrictions
- 5.9 No Conflicts of Interest
- 5.10 No Pending Litigation
- 5.11 Certificate of Good Standing
- 5.12 Local and Minority Business Participation

SECTION VI: PROPOSAL EVALUATION AND SELECTION PROCESS

- 6.1 Selection Process
- 6.2 Evaluation and Selection Committee
- 6.3 Qualifying Proposals
- 6.4 Priority/Preferred Requirements
- 6.5 Evaluation Criteria
- 6.6 Final Ranking
- 6.7 Selection
- 6.8 Proposals Property of DHCD and the City of Bowie

EXHIBITS

Exhibit A: Assessment of Fair Housing Tool for Local Governments

Exhibit B: Analysis of Impediments to Fair Housing Choice for Prince George's County and the City of Bowie, dated April 2011 (revised June 2012), adopted by the Prince George's County Council on November 12, 2013

SECTION I: INTRODUCTION

1.1 PURPOSE

The Prince George's County Department of Housing and Community Development (DHCD) and the City of Bowie are seeking proposals from interested parties to conduct a comprehensive analysis and utilize "best practices" for the preparation of the Prince George's County and City of Bowie Analysis of Impediments to Fair Housing Choice (AI) plan. It is essential that Prince George's County and City of Bowie (hereinafter referred to collectively as "County"), recipients of Federal entitlement funds, certify that they will affirmatively further fair housing.

The County receives an annual allocation of entitlement funds from the United States Department of Housing and Urban Development (HUD). HUD requires each entitlement jurisdiction to be fully aware of the existence, nature, extent and causes of all fair housing matters. HUD requires that an analysis of these issues be executed in order to assess the status of fair housing in the entitlement jurisdiction. The purpose of the Analysis of Impediments to Fair Housing Choice (AI) plan is to specifically examine how state, local, and regional laws, private, public, and non-profit sector regulations, administrative policies, procedures, and practice impact the location, availability, and accessibility of housing for a local jurisdiction and the protected classes including race, color, national origin, religion, sex, familial status or disability. Additionally, the plan will assess the challenges in advancing fair housing as it extends into broader geographic areas or region, identify effective strategies that meaningfully address interconnected causes of disparities in access to opportunity, and provide means of building regional support to address those issues.

As a condition of receiving the Community Development Block Grant ("CDBG") funds and other HUD formula-based funding, the County must submit a Consolidated Plan that analyzes housing market conditions, assesses the housing needs of its lower income families and other groups within the eligible population, describes a strategy for addressing the identified needs, and articulates an action plan for investing federal affordable housing dollars. The Consolidated Plan's certification requirement to affirmatively further fair housing requires entitlement jurisdictions to undertake Fair Housing Planning (FHP). The Consolidated Plan also requires citizen participation in its analysis of housing conditions. Therefore, entitlement jurisdictions are asked to seek the input and cooperation of other state and local governmental agencies, and community and business organizations.

Consultant shall discuss with the agency contact any design concepts or anticipated problems or concerns that arise during your preliminary review of this Request for Quotation.

Additional information may be obtained from the following publication: Fair Housing Planning Guide, <http://www.hud.gov/offices/fheo/images/fhpg.pdf>

The County seeks a capable and qualified firm to:

- Complete a comprehensive analysis and review of the County’s laws, executive orders, regulations, administrative policies, pending legislation, procedures, activities and practices, and data which have a direct and indirect impact on fair housing choice.
- Assess how local policies affect the location, availability and accessibility of housing, and of conditions, both public and private, that affect fair housing choice.
- Analyze County data which depicts areas that contribute or foster discriminatory actions or have a disparate impact on protected groups under the law.
- Assess the level by which County residents face impediments to fair housing through discriminatory practices of the private sector, government or the non-profit sector.
- Make general and specific recommendations to DHCD and City of Bowie regarding steps to overcome impediments to fair housing and the necessary actions for the County to affirmatively further fair housing.
- Provide draft recommendations to DHCD and the City of Bowie on how the County (through legislation, ordinances, and actions) can overcome the identified impediments to fair housing choice.

1.2 **BACKGROUND**

The Analysis of Impediments to Fair Housing Choice (AI) Plan is a document required by the U.S. Department of Housing and Urban Development (HUD) as a requisite to receiving entitlement funding. An AI is a comprehensive review of a state’s or entitlement jurisdiction’s laws, regulations and administrative policies, procedures and practices. Further, the AI involves an assessment of how these laws, regulations, policies and procedures affect the location, availability, and accessibility of housing, and how conditions, both private and public, affect fair housing choice.

The Department of Housing and Community Development (DHCD) and the City of Bowie are required to affirmatively further fair housing, a mandate under Section 808(e)(5) of the Fair Housing Act. In their application for federal assistance and Consolidated Plans, DHCD and the City of Bowie each certify that the agencies, Prince George’s County and the City of Bowie, will ‘affirmatively further fair housing’ in all its programs. The Fair Housing Act and its regulations apply to all housing transactions regardless of public or private financing.

In order to complete a successful Analysis of Impediments to Fair Housing Choice plan, the County must conduct a county-wide analysis; take appropriate actions to overcome the effect of any impediment found and maintain records of the analysis and actions taken

to remedy the impediment.

All the information must be compiled into a single report, with appropriate explanations and analysis provided to interpret the information, as well as recommendations or measures to eliminate impediments where they are found.

1.3 ELIGIBLE APPLICANT(S)

The Applicant must not have caused a government authority to violate any affordability and/or regulatory agreements of any County agency, or other housing agencies, nor have a record of discriminatory practices.

The Applicant must have a successful track record in providing the types of services as defined within the Scope and Requirements section contained within this RFP solicitation. Qualified applicants must possess experience in providing the services as described in the RFP, and a working knowledge of the federal funding requirements governing DHCD and the City of Bowie's federal entitlement Programs.

1.4 APPLICATION CLOSING DATE

The Applicant must submit an original and 5 copies of the proposal in response to this RFP, including a statement of qualifications evidencing the minimum standards required herein and any proposed special conditions regarding this RFP, along with an electronic version on a compact disk (CD) in a sealed package and address to:

Adedamola George, Esq.
Senior Compliance Officer
Prince George's County DHCD
9200 Basil Court, Suite 306
Largo, Maryland 20774

Proposals in response to this RFP must be received and time stamped by DHCD no later than April 19, 2019 at 5:00 p.m. EST (closing date). Financial and technical responses must be submitted in individual clearly marked envelopes (example: XYZ Corp. Financials), but in one package. The package submittals must be sealed, and the outside of the package envelope must be clearly marked **“RFP No. 2019-01: Analysis of Impediments to Fair Housing Choice (AI) Plan.”**

Late proposals will not be considered. Applicants mailing proposals should allow sufficient mail delivery time to ensure timely receipt by DHCD. The Applicants shall prepay any shipping/delivery charges, as applicable, for all documents submitted. Proposals or amendments thereto must be received in the designated location not later

than the scheduled time and date for proposal opening or closing date and time for receipt of proposals. Proposals received (and time stamped) after the scheduled time will be considered late and returned to the sender unopened. Postal delays or misrouting shall not constitute a basis for acceptance of late proposals.

1.5 WITHDRAWALS OF MODIFICATIONS OF PROPOSALS

A written request for the withdrawal of a proposal, or modification of a proposal, may be granted if the request and the envelope containing the request is identified with the Proposal number, title, time and date of proposal opening, or closing date for receipt of proposals, and is received in the designated location prior to the closing date and time for receipt of proposals.

1.6 QUESTIONS AND INQUIRIES

Questions and inquiries must be submitted via email no later than fifteen business days prior to the Request for Proposal closing date to:

aogeorge@co.pg.md.us

All inquiries must refer to the page and applicable RFP section to which the question relates. Phone calls or faxed questions will not be accepted. All questions and answers will be posted to DHCD and the City of Bowie's websites no later than ten business days prior to the closing date. Both DHCD and the City of Bowie reserve the right to decline to answer specific questions. Responses to questions, in either written or oral form, will not be deemed to amend the RFP unless and until the response is included in a formal addendum to the RFP. All potential respondents are responsible for checking DHCD and the City of Bowie's websites for any addendums.

1.7 PROPOSAL ACCEPTANCE

DHCD and the City of Bowie reserve the right to reject any proposal from any person, firm or corporation that is in arrears or in default to Prince George's County or the City of Bowie upon any debt or contract, or that is a defaulter, as surety or otherwise, upon any obligation to said County, or had failed to perform faithfully any previous contract with the County. DHCD and the City of Bowie reserve the right to accept or reject any and all proposals in response to this RFP, in whole or in part, received as a result of this solicitation and to waive minor irregularities. Further, DHCD and the City of Bowie reserve the right to make a whole award, partial award, or no award at all.

1.8 DURATION OF PROPOSAL OFFER

Proposals in response to this RFP are to be held valid for six months following the closing date. This period may be extended by mutual written agreement between the Applicants and “DHCD and the City of Bowie” (collectively).

1.9 NOTICE TO APPLICANTS

Before submitting a proposal, Applicants are to completely familiarize themselves with the requirements of this RFP. Failure to do so will **not** relieve the Applicant of responsibility to fully perform in accordance therewith. No consideration will be granted for any alleged misunderstanding of the material to be furnished or work to be done, it being understood that the submission of a proposal is an agreement with all of the items and conditions referred to herein.

No proposal will be allowed to offer more than one price on each item even though they may feel that he or she has two or more methodologies that will meet specifications. Applicants must determine for themselves which to offer. If said applicant should submit more than one price on any item all prices for that item may be rejected at the discretion of the DHCD and the City of Bowie.

2.0 INDEMNITY

Contractor shall indemnify, keep and save harmless Prince George’s County, DHCD, the City of Bowie, its agents, officials and employees, against all injuries, death, loss damages, claims, patent claims, suits, liabilities, judgments, costs and expenses, which may in anyway accrue against the County in consequence of the granting of this contract of which may in anyway result therefrom, whether or not it shall be alleged or determined that the act was caused through negligence or omission of the contractor or his employees, of the subcontractor or his employees, if any, and the contractor shall, at his own expense, appear, defend and pay all charges of attorneys and all costs and other expenses arising therefrom or incurred in connection therewith, and if any judgment shall be rendered against the County in any such action, the contractor shall at his own expense, satisfy and discharge the same. The Contractor shall take proper safety and health precautions to protect their work, their employees, the public and the property or other from any danger or injury resulting solely from the performance of their work described herein. Contractor expressly understand and agrees that any performance bond or insurance protection required by this contract, or otherwise provided by contractor, shall in no way limit the responsibility to indemnify, keep and save harmless and defend the County as herein provided.

SECTION II: GENERAL TERMS AND CONDITIONS

2.1 ECONOMY OF PREPARATION/INCURRED EXPENSES

Proposals should be prepared simply and economically, providing a straightforward, concise delineation of the Applicant's capabilities and description of the proposal to meet the requirements of this RFP. DHCD and the City of Bowie will not be responsible for any costs incurred by any Applicant in preparing and submitting a response to this RFP.

2.2 ADDENDA TO THE REQUEST FOR APPLICATIONS

If it becomes necessary to revise any part of this RFP, addenda will be provided by email to all firms listed by DHCD and the City of Bowie as receiving a copy of the RFP. Written acknowledgement of receipt of all issued amendments, addenda or changes issued will be required from all Applicants responding to this RFP and in the form required by the solicitation documents.

2.3 ORAL PRESENTATIONS

DHCD and the City of Bowie reserve the right to conduct individual interviews with finalists and to request best and final offers from any or all finalists. Those Applicants may be required to provide oral presentations to discuss their proposal, answer questions from a Proposal Advisory Group (PAG), and/or clarify their technical submittal.

2.4 CONFIDENTIALITY/PROPRIETARY INFORMATION

Applicants must specifically identify those portions of their proposals, if any, which they deem to contain confidential, proprietary information or trade secrets and must provide justification why such material should not, upon request, be disclosed by DHCD and the City of Bowie, in accordance with the Maryland Freedom of Information Act, 10-601 *et. seq.*, State Government Article, Maryland Annotated Code. Applicants must clearly indicate each page that is deemed to be confidential/proprietary or a trade secret (it **IS NOT** sufficient to preface your proposal with a proprietary statement).

2.5 ALLOWANCE OF IN-HOUSE WORK

No section or portion of this RFP or the Contract shall be construed or interpreted to preclude DHCD and the City of Bowie from accomplishing any task or undertaking of any operation or project utilizing its own work force.

2.6 FORMATION OF AGREEMENT/CONTRACT WITH SUCCESSFUL CONTRACTOR

The Contract to be negotiated as a result of this RFP (the "Contract") shall be by and between the Applicant as Contractor and “DHCD and the City of Bowie” (collectively) and shall contain provisions included in this RFP. By submitting a proposal in response to the RFP, the Applicant accepts the terms and conditions set forth herein.

2.7 PERIOD OF CONTRACT

The term of the Contract(s) resulting from this RFP shall commence upon execution of an Operating Agreement and will continue for a one-year period, with a renewal option executable by the County subject to the availability of funds, at a rate and term agreed to and upon by both the Applicant and “DHCD and the City of Bowie” (collectively). DHCD and the City of Bowie anticipate the term of the Contract to commence no later than May 1, 2019 through October 30, 2019.

2.8 TERMINATION FOR CONVENIENCE

The performance of work under this contract may be terminated by DHCD and the City of Bowie without written notice or such time as mutually agreeable to the parties not to exceed 30 days, in accordance with this clause in whole, or from time to time in part, or whenever DHCD and the City of Bowie shall determine that such termination is in its best interest. The County will pay all reasonable costs associated with this contract that the applicant has incurred up to the date of termination and all reasonable costs associated with termination of the contract. However, the applicant may not be reimbursed for any anticipatory profits which have not been earned up to the date of termination.

2.9 AFFIDAVITS, CERTIFICATIONS AND AFFIRMATIONS

Applicants are required to submit with their proposal certain certifications, affirmations and affidavits.

SECTION III: SCOPE OF PROGRAM FUNCTIONS AND WORK

3.1 SCOPE OF PROGRAM OPERATIONS

The Analysis of Impediments to Fair Housing Choice (AI) plan is a review of impediments to fair housing choice in the public and private sectors throughout Prince George’s County, the City of Bowie, and the surrounding region. The Contractor shall evaluate policies and programs that affect fair housing in the unincorporated areas, local

policies that affect fair housing in the City of Bowie, as well as fair housing issues that extend into the broader geographic areas or region. Impediments to fair housing choice are defined as:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choices or the availability of housing choice.
- Any actions, omissions, or decisions that have this effect. Such actions, omissions, or decisions include those that have an intentional or unintentional discriminatory impact.

The AI involves:

- A comprehensive review of local laws, regulations, and administrative policies, procedures, and practices;
- An assessment of how prevailing laws, etc., affect the location, availability, and accessibility of housing; and
- An assessment of conditions, both public and private, affecting fair housing choice.
- An identification of regional fair housing issues and the contributing factors.

Components of the AI include:

- An examination of all parts of the County, City of Bowie and regional housing market and prevalent practices in related transactions as they directly or indirectly impact housing choice. Public and private transactions, as well as entities that need to be evaluated, include, but are not limited to the following areas: local laws, ordinances, regulations, policies and procedures; mortgage lending; insurance sales and underwriting; property appraisal; Realtors; mortgage brokerage firms; and property management.
- An explanation of how areas were evaluated, what was found, proposed methods of correction to address identified impediments, identification of potential financial and organizational resources to implement corrective actions, as required.
- A process for obtaining input from citizens in the community, especially those for whom fair housing is a concern, by holding fair housing forum(s), public meeting(s) and/or other means to get information and identify concerns.
- The AI should be completed in accordance with HUD's Fair Housing Planning Guide. The Guide can be found by following the "Fair Housing Planning Guide" link found at <http://www.hud.gov/offices/fheo/promotingfh.cfm>.

In 2015, HUD published a final rule (80 FR 42271) replacing the Analysis of Impediments to Fair Housing Choice (AI) with “Affirmatively Furthering Fair Housing (AFFH).” However, HUD has since suspended the AFFH/AFH requirement.

Nevertheless, entitlement jurisdictions are still required to complete an AI Fair Housing Plan with a regional perspective. In order to satisfy the HUD requirement, the Metropolitan Washington Council of Governments (MWCOCG) has agreed to assist all of its housing departments in a collaborative “Regional AI.”

Please note that Prince George’s County and the City of Bowie have opted not to participate with the neighboring jurisdictions on this regional effort; however, as the second largest county in the region, Prince George’s County (inclusive of the City of Bowie) must participate and produce regional data on fair housing in its AI plan by establishing a framework for cooperation, to the extent possible, including but not limited to sharing data and ideas. Ultimately, the consultant must be prepared to participate in this process and provide data, presentations, and other responsibilities, as required.

The suggested and recommended format and topics for inclusion in the AI are provided in the HUD Assessment of Fair Housing Tool for Local Governments (Exhibit A). Please note that this is the preferred resource/tool, in order to closely follow the MWCOCG Regional AI team process. Additionally, a review and analysis of the HUD AFFH Data and Mapping Tool must be conducted in order to show the disparities across the region.

Further, as an added resource, a copy of the Analysis of Impediments to Fair Housing Choice for Prince George’s County and the City of Bowie, dated April 2011 (revised June 2012), adopted by the Prince George’s County Council on November 12, 2013, is available for review Monday through Friday from 8:00AM to 5:00PM at the Prince George’s County Department of Housing and Community Development Division, 9200 Basil Court, Suite 306, Largo, Maryland 20774 or our website: <https://www.princegeorgescountymd.gov/908/Housing-Community-Development>.

The selected consultant shall regularly meet and work with various County departments and offices, including but not limited to, County’s Office of Housing and Community Development, Prince George’s County Department of Social Services, Prince George’s County Human Relations Commission, as well as representatives from other boards, committees, citizen groups, and/or government bodies who wish to participate in the process.

3.2 SCOPE OF WORK

The functions to be administered and implemented will be defined in an executed

Contract(s) between the selected applicant and the County, including but not limited to:

Provide Comprehensive Research and Recommendations

- A. Contractor must convene an equitable number of private/public sector participants from industry, advocacy and government sectors, and community-based organizations to discuss the County's state of fair housing and provide recommendations on solutions to impediments/obstacles to fair housing choice.
- B. Attend meetings/public hearings, in addition to preparing presentations and materials for such meetings, as directed.

Provide Qualitative Evidence

- A. Contractor will obtain qualitative anecdotal evidence using the following sources and methods:
 - I. Create an advisory group composed of advocacy, industry, government and consumer stakeholders to address the impediments and provide recommendations to resolve the listed impediments to fair housing choice.
 - II. Conduct interviews and analysis of all data from stakeholders in the housing industry (e.g., developers, lenders, Realtors, mortgage companies, real estate brokers, insurance companies, home inspectors, appraisers, management companies, etc.);
 - III. Conduct interviews and analysis of data from stakeholders in the government sector;
 - IV. Conduct interviews and analysis of data from stakeholders in the non-profit advocacy sector (e.g., Community-Based Organizations, Community Development Corporations, Housing Counseling groups, consumer protection agencies, etc.);
 - V. Conduct interviews and analysis of data from local, regional and national stakeholders in the legal and research sectors (Tenant Legal Aid Centers, Landlord and industry representatives; think tanks, immigrant legal and research centers, regulatory agencies); and
 - VI. Attend meetings with DHCD and City of Bowie's staff monthly to provide updates on tasks and time timeline deliverables.

Provide Analysis of Local, Regional and National Data

- A. Analyze local, regional and national data: directly and indirectly related to housing

issues but impacting fair housing choice. Contractor will conduct a quantitative analysis using the following data, sources and methods:

- I. Conduct a literature, legislative, and legal review of relevant policies, ordinances, public services, local and regional practices, planning and zoning laws, and regulations which directly or indirectly affect fair housing in the County and the surrounding region. Below is an example of data sources to examine. Please note that the list is not exhaustive, and vendor is expected to provide a complete and thorough list of sources contacted and examined;
- II. Analysis of Segregation and Integration of Protected Classes
 - i. Identify pertinent data including demographic, income, employment and housing data as well as studies that have been completed that relate to fair housing;
 - ii. Identify pattern/areas of segregation at the regional and census tract level; and
 - iii. Analyze factors that create or perpetuate segregation of protected classes and identify ways to address them (e.g. best practices).
- III. Analysis of Racially and Ethnically Concentrated Areas of Poverty (RCAP/ECAP)
 - i. Identify racially or ethnically concentrated areas of poverty by calculating the population in RCAP/ECAP as a percentage of the total population by race and for each ethnic group;
 - ii. Analyze factors that create or perpetuate these areas and factors that prevent de-concentration.
- IV. Review of Disparities in Access to Opportunity
 - i. Identify areas/neighborhoods with elements of opportunity (schools, employment, healthcare, transportation, retail, public services, low-crime, recreation, etc.);
 - ii. Identify areas/neighborhoods with missing elements of opportunity or elements requiring enhancements; and
 - iii. Analyze the factors that create or perpetuate the disparity.
- V. Analysis of Fair Housing Environment
 - i. Identify any findings of discrimination by HUD, an equivalent agency,

or a court and analyze plans to resolve the cause;

- ii. Identify local and regional fair housing agencies and provide a review of prior and current activities that promote fair housing, including an assessment of agencies currently providing fair housing programs in the area;
- iii. Identify opportunities for collaborative efforts to advance fair housing; and
- iv. Analyze the barriers to effective fair housing enforcement and education.

VI. Analysis of Private Market Activity

- i. Provide an examination of private market issues that relate to the sale or rental of housing, the provision of brokerage services, mortgage lending, insurance sales and underwriting, property appraisal and property management.

VII. Review demographic and housing data from federal agencies, and national organizations (U.S. Census; HUD, National Community Reinvestment Coalition, etc.);

VIII. Analyze current mortgage lending data provided through the Home Mortgage Disclosure Act (HMDA);

IX. Analyze and assess studies on discrimination impact on underserved and immigrant communities (Urban Institute, Center for Responsible Lending, NCRC, etc.);

X. Assess studies and cases affecting Limited English Proficient populations in the County and their access to housing products; and

XI. Evaluate updated home sales information from the Prince George's County Office of Finance and credible studies.

Provide an Examination of Federal and County Legislation and Rules

A. Examine the history of legislation and impact of rules, ordinances, and laws to prevent predatory lending in the County methods:

- I. Locations of assisted housing from HUD and the Prince George's County Housing Authority; and
- II. Examine data on neighborhood characteristics gathered through the Urban

Institute's. This will include information such as the location of financial services in the County.

Provide Project Work Plan

- A. Provide a Project Work Plan and Methodology of tasks and deliverables within 15 days of the contract award. The work plan will be returned to contractor within 7 days with comments, if any.

Provide Timeline for Submission of Reports

- A. Submit reports by on the First Tuesday of every month for the term of the contract which provides information on the status of tasks in accordance with the Contractor work plan and include any impediments to task completion during the reporting period. Reports may be submitted by email.

Provide Draft Report

- A. Submit a Draft report for DHCD input, make revisions and incorporate comments by DHCD and the City of Bowie one month prior to submitting final document.

Provide and Facilitate Public Presentation of Draft AI Plan

- A. Submit the preliminary draft AI for review and comments. The vendor will revise the AI according to any proposed changes and then re-submit draft for review.
- B. The vendor may be required to join staff at public hearings to present the draft AI to any other elected officials from any jurisdictions requesting review.

Provide Recommendation

- A. Identifying Impediments and Corrective Actions: The consultant will provide an initial list of impediments to fair housing listed in order of priority with proposed methods of corrective actions. For each impediment, the consultant(s) must:
 - Identify one or more contributing factors to the impediment;
 - Corrective actions or goal related to overcoming the identified contributing factor(s) and related impediment;
 - Identify the metrics and milestones for determining what fair housing results will be achieved, including the timeframes for achieving them; and
 - Identify the responsible party for each corrective action or goal.
- B. Provide a recommendations section to the Final Analysis of Impediments to Fair

Housing Choice deliverable of possible fair housing conditions which need additional analysis and monitoring by the DHCD and the City of Bowie.

Provide Draft Report for Public Comments & Public Hearings

- A. Submit the draft AI plan with supporting data in electronic format. After review and acceptance of the draft report, the plan and supporting data will be released to the public providing 30 calendar days to submit comments. The vendor will review, summarize and address comments, received in writing or orally, through the public comment period and prepare a revised AI for approval.
- B. The vendor will present the draft AI at a minimum of two public hearings to provide an overview of the AI process, a summary of the recommendations and actions planned to eliminate the effects of any impediments identified, and provide responses to questions.

Provide Final Comprehensive Document

- A. Submit a final comprehensive and thoroughly investigated document with a Summary of Findings section. The report shall be submitted to DHCD and the City of Bowie in a hard copy and in digital format along with digitized supporting research materials including statistical analysis, meeting notes and minutes, and interview transcripts.

SECTION IV: SCHEDULE OF DELIVERABLES

The Contractor will:

1. Provide a Project Work Plan and Methodology of tasks and deliverables within 15 days of the contract award. The work plan will be returned to contractor within 7 days with comments, if any;
2. If at any time during the analysis HUD implements the final AFFH rule, the consultant will be required to incorporate the new rule using data provided by HUD and AFH Assessment Tool.
3. Until program participants are required to submit an Assessment of Fair Housing (AFH) under this final rule, the program participant must continue to conduct the AI Fair Housing plan in accordance with existing HUD regulations.
4. Meet with appropriate DHCD and the City of Bowie supervisors to ensure time-line is achievable;
5. Submit reports by on the First Tuesday of every month for the term of the contract which provides information on the status of tasks in accordance with the

Contractor work plan and include any impediments to task completion during the reporting period. Reports may be submitted by email;

6. Submit a Draft report for DHCD and the City of Bowie's input, make revisions and incorporate comments from DHCD and the City of Bowie prior to submitting final document;
7. Provide a recommendations section of possible fair housing conditions which need additional analysis and monitoring by the Prince George's County and the City of Bowie; and
8. Submit a final comprehensive and thoroughly investigated document with a Summary of Findings section. The report shall be submitted to both DHCD and the City of Bowie in a hard copy and in digital format along with digitized supporting research materials including statistical analysis, meeting notes and minutes, and interview transcripts.

SECTION V: PROPOSAL CONTENTS

5.1 PROPOSAL FORMAT OUTLINE

Each proposal shall have the sections identified in the HUD Assessment of Fair Housing Tool for Local Governments, attached as Exhibit A, prominently displayed.

5.2 APPLICATION AFFIDAVIT

The first page of the proposal in response to this RFP shall be the Application Affidavit. This document must be drafted and signed by an authorized representative of the applicant who has legal authority to bind the entity into contract with the County.

5.3 ORGANIZATIONAL STRUCTURE, CAPACITY, AND FINANCIAL STRENGTH

The Proposal must include an organizational chart to delineate responsibilities and duties of key staff. Resumes for key staff must be included with the submission. The submission must also include the Applicant's audited and/or unaudited financial statements for the last three years.

5.4 PROCESSING TIMELINE

The Proposal must include a schedule of key activities and timelines for creating and implementing a comprehensive analysis on Analysis of Impediments to Fair Housing

Choice taking into account all funded projects and programs within the County's portfolio. This timeline should cover the period beginning with the initial date of engagement as identified within the Agreement, up to and including the sunset date as specified within the Agreement, which may be subject to change due to extension or mutual agreement as documented by any corollary or contractual addendum.

5.5 RESPONSE AND DOCUMENTATION OF QUALIFICATIONS

Please be as complete as possible otherwise your response may be considered as non-responsive, in which case, your application may be disqualified.

1. Provide a list of clients, public or private, for whom you have provided the services described in the Scope of Work and Program Services during the last five (5) years;
2. List the number of years your organization has provided fair housing related services for any federally funded program and describe your organization's experience, if any, under a similarly structured agreement. Include within your description the name of the participating jurisdiction, or agency;
3. Describe your organizational capacity to conduct fair housing analysis and implement an action plan;
4. Identify contract services previously conducted on behalf of other municipalities, jurisdictions or government entities utilizing the services included within this RFP. Include within your identification the name of the municipality, dates of service and scope of services performed;
5. List any professional designations or licenses associated with the work being requested. For verification purposes, please include documentation of professional designation and/or a copy of the licenses and contact information of the licensing authority, including a phone number;
6. Describe your experience working, in any capacity, with federal and local program funds; and
7. Specify whether your organization has been involved in any lawsuits or other legal actions within the past five (5) years. If so, please provide adequate detail in your response.

5.6 FEE FOR SERVICES COST SCHEDULE

The Proposal must include a not-to-exceed fee for services on a per-hour and/or per project basis associated with services being proposed. This fee schedule must include direct and indirect costs. All administrative costs must be detailed by account line item.

The schedule should detail the cost associated with the delivery of services.

5.7 CERTIFICATE OF INSURANCE REQUIREMENTS

The selected Applicant(s) will be required to obtain and keep in force for the term of the contract the following insurance, which must identify Prince George's County, Maryland and the City of Bowie as certificate holders and additional insured on the policy. Applicant(s) should submit original certificates of insurance or documentation from their insurance company verifying such insurances are available to the Applicant should an award be made under this RFP.

WORKER'S COMPENSATION INSURANCE covering the applicant's employees as required by Maryland Law and employer liability limits of not less than:

- \$500,000 per accident;
- \$500,000 per disease; and
- \$500,000 disease aggregate

COMMERCIAL GENERAL LIABILITY INSURANCE to include off premises activities where applicable. Limits of not less than:

- \$1,000,000/\$2,000,000 bodily injury and property damage per occurrence/aggregate;
- \$5,000 premises medical payments;
- \$1,000,000 fire legal liability;
- \$1,000,000 personal and advertising injury;
- \$2,000,000 general aggregate, per project (applicable to this RFP)

BUSINESS AUTOMOBILE LIABILITY INSURANCE covering bodily injury and property damage in the minimum combined single limit of:

- \$1,000,000 per accident

PHYSICAL AND SEXUAL ABUSE LIABILITY INSURANCE covering the Applicant's employees with liability limits of not less than:

- \$100,000 per individual/\$300,000 per occurrence

MISCELLANEOUS PROFESSIONAL (Errors and Omissions) LIABILITY INSURANCE covering payment of all costs the applicant shall become legally obligated to pay for damages due to any claim caused by any negligent act, error or omission of the Applicant or any other person for whose acts the Applicant is legally liable with liability limits of not less than:

- \$1,000,000 per claim and aggregate

During the performance of services called for under this RFP, the selected applicant shall ensure that all contractors and/or subcontractors that perform work related to this RFP shall maintain throughout the period of the respective contractor's performance (1) General Liability insurance in the amount of \$1,000,000 at a minimum, (2) Workers' Compensation insurance meeting the Statutory Limits for Maryland and Employers' Liability limits of \$500,000 and (3) business automobile liability insurance in the amount of \$1,000,000 if applicable. All contractors and subcontractors shall designate Prince George's County, Maryland and the City of Bowie as Additional Insured and Certificate Holder on each Certificate of Liability Insurance. The selected applicant shall maintain copies of the Certificates of Liability Insurance from each contractor.

DHCD and the City of Bowie reserve the right to request insurance coverage above what is listed based on final review by the County's Office of Risk Management

5.8 EXCEPTIONS OR RESTRICTIONS

Should the Applicant take exception to any provision or requirement of this RFP, it must be indicated in writing and included with the Proposal submission.

5.9 NO CONFLICTS OF INTEREST

As a prerequisite for the payment pursuant to the terms of this contract, there shall be furnished to DHCD and the City of Bowie, a statement, under oath that no member of the elected governing body of Prince George's County or the City of Bowie, or members of his or her immediate family, including spouse, parents, or children, or any person representing or purporting to represent any member or members of the elected governing body has received or has been promised, directly or indirectly, any financial benefit, by way of fee, commission, finder's fee, political contribution, or any other similar form of remuneration and/or on account of the acts of awarding and/or executing the contract and that upon request by DHCD and/or the City of Bowie, as a prerequisite to payment pursuant to the terms of this contract, there will be furnished to the requester, under oath, answers to any interrogatories related to a possible conflict of interest as herein embodied. Any contract made or entered into where it is discovered that the violation of the intent of this provision exists shall be declared null and void and all monies received by the contractor shall be returned to DHCD and the City of Bowie (collectively).

5.10 NO PENDING LITIGATION

The Applicant must affirm that they are not party to any pending litigation against DHCD, Prince George's County or the City of Bowie.

5.11 CERTIFICATE OF GOOD STANDING

The Applicant must provide a Certificate of Good Standing from the State of Maryland.

5.12 LOCAL AND MINORITY BUSINESS PARTICIPATION

DHCD and the City of Bowie seek local and minority business participation. Applicants should identify and provide supporting documentation if it is a certified Minority Business Enterprises and/or local business. A business enterprise which is at least fifty-one percent (51%) owned by one or more minority individuals, or in the case of a publicly-owned corporation, at least fifty-one percent (51%) of the stock is owned by one or more minority individuals, and whose general management and daily business affairs and production operations are controlled by one or more minority individuals and has been certified by the Prince George's County Supplier Development & Diversity Division (SDDD). Further, any plans for local and minority contracting, and hiring should be submitted.

SECTION VI: EVALUATION AND SELECTION PROCESS

6.1 SELECTION PROCESS

The response to this RFP that best meets DHCD and the City of Bowie’s requirements and the objectives will be selected.

6.2 EVALUATION AND SELECTION COMMITTEE

The Proposal Advisory Group (PAG) will evaluate all proposals received by the closing deadline. The PAG may request additional technical assistance from any resource at its discretion.

6.3 QUALIFYING PROPOSALS

The PAG shall first review each Proposal for compliance with the requirements of this RFP. Failure to comply with any requirements of this procurement may disqualify an Applicant’s Proposal. DHCD and the City of Bowie reserve the right to waive a requirement and/or minor irregularities when it is in their best interest to do so. Proposals will not be opened publicly. DHCD and the City of Bowie also reserve the right to request supplemental information from Applicants during the evaluation period.

6.4 PRIORITY/PREFERRED REQUIREMENTS

All proposals will be reviewed for the priority and preferred requirements detailed below. DHCD and the City of Bowie reserve the discretionary right to make exceptions to these requirements.

Priority Requirements

1. Have a minimum of five (5) years of experience working with government agencies;
2. Be familiar with HUD's guidelines for completing an AI and familiar with the County's findings in previous AI reports;
3. Must not have violated affordability/regulatory agreements of the DHCD, the City of Bowie or other housing agencies, nor have a record of discriminatory practices for at least the past five (5) years;
4. Experience in the last five (5) years in working with local governments in providing comprehensive fair housing related services and approving dispersals of Federal entitlement funds. This experience includes understanding government regulations in administering the various programs and their funding sources;
5. Have completed and published housing related research at local and or national level, preferably fair housing analyses;
6. Knowledgeable of the County and national fair housing issues impacting upon fair housing choice in the County;
7. Be able to convene industry and non-profit sector partners to provide solution recommendations on impediments found;
8. Have established relationships with pertinent local government agencies and national organizations in order to readily access housing data and statistics;
9. Objectively review, revise, analyze, investigate, disclose, and update information and data relevant to housing choice; and
10. Be able to access and interpret Census data as well as objectively interpret statistical and demographic data which present housing access disparities, i.e., Home Mortgage Disclosure Act (HMDA) reports, predatory lending statistics and patterns, insurance patterns, rental, sales, & accessibility discrimination studies, public housing data, case law, Zoning laws, local and national housing legislation with direct or indirect impact on fair housing, aggregate data on immigrant populations, etc.

Preferred Requirements

1. Ability to provide references of the above listed requirements as evidence of satisfactory experience and performance. The County prefers reference letters from government agencies, or government contractors demonstrating an existing

relationship, and other key stakeholders who can attest to the organization’s ability to complete the work outlined in the RFP.

6.5 EVALUATION CRITERIA

After determining compliance with the requirements listed above, the PAG shall conduct its evaluation of the technical and cost merit of the proposals. Each proposal received as a result of this RFP shall be subject to the same review and evaluation process. The following criteria will be used in the evaluation of submitted proposals:

<p>Demonstrated experience and qualifications providing fair housing related services.</p> <ul style="list-style-type: none"> • Organizational Capacity • Experience with Limited English Proficiency and other fair housing concerns within the County • Financial Strength • In-place Established Systems 	<p>30 Points</p>
<p>Demonstrated experience working with federally funded programs, especially the following:</p> <ul style="list-style-type: none"> • HOME • CDBG • ESG • HOPWA • Other HUD programs • Other locally-funded programs, including state or local Housing Trust Funds 	<p>25 Points</p>
<p>Demonstrated experience in conducting an AI for large Counties and municipalities</p>	<p>25 Points</p>
<p>Cost Competitiveness of Project Monitoring and Management Fees</p> <ul style="list-style-type: none"> • Direct Cost • Indirect Cost • Cost Allocation Plan 	<p>15 Points</p>
<p>Responsiveness to the RFP</p> <ul style="list-style-type: none"> • Level of Clarity • Demonstrates capacity to meet RFP objectives • Proposal Contents 	<p>15 Points</p>
<p>BONUS POINTS – Local and Minority Business Involvement</p> <ul style="list-style-type: none"> • The higher the level of local and minority business participation, the higher the score in this category. 	<p>10 Points</p>

BONUS POINTS – Demonstrated experience in conducting a regional AI for large Counties and municipalities.	5 Points
TOTAL POSSIBLE	125 Points

6.6 FINAL RANKING

The evaluation criteria contained herein shall be scored by the PAG based upon the stated weight factors for each evaluation criteria. The PAG will make recommendations to the Deputy Director and Director for award of the exclusive right to negotiate a Contract with the County and the City of Bowie based on the terms of the Applicant’s submission.

Based on the PAG’s initial review of proposals, DHCD and the City of Bowie reserve the right to invite, without cost to itself, ranking finalists to make a presentation of their proposal and their capabilities as a further consideration in the selection process. DHCD and the City of Bowie reserve the right to make an award with or without negotiations or to request best and final offers. Only those Applicants who are deemed to be reasonably susceptible of being selected for award shall be offered the opportunity to participate in this process. DHCD and the City of Bowie also reserve the right to request supplemental information.

6.7 SELECTION

Prior to the execution of a Contract, the selected Applicant(s) will be responsible for the following:

1. Review the Federal Code governing the requirements to Affirmative Further Fair Housing (80 FR 42357) and prepare concerns/questions for further discussion: <https://www.federalregister.gov/documents/2015/07/16/2015-17032/affirmatively-furthering-fair-housing>;
2. Review of the Fair Housing Planning Guide – HUD <https://www.hud.gov/sites/documents/FHPG.PDF>;
3. Review the Prince George’s County and City of Bowie’s 2012 Analysis of Impediments to Fair Housing, attached as Exhibit B to this RFP, and prepare concerns/questions for further discussion;
4. Review of the Prince George’s County Comprehensive Housing Strategy (CHS)¹;
5. Review of Plan 2035 Prince George’s - Approved General Plan; and

¹ The Prince George’s County Comprehensive Housing Strategy (CHS) is currently available in DRAFT form online.

6. Examining the correlation between "Fair Housing" and "Affordable Housing"

6.8 PROPOSALS PROPERTY OF DHCD AND THE CITY OF BOWIE

All proposals submitted in response to this Request for Applicants become the property of DHCD and the City of Bowie and may be appended to any formal documentation which would further define or expand the contractual relationship between DHCD, City of Bowie and the successful Applicant(s).

**EXHIBIT A – ASSESSMENT OF FAIR HOUSING
TOOL FOR LOCAL GOVERNMENTS**

EXHIBIT A

Assessment of Fair Housing Tool for Local Governments (LG2017)
30-Day Public Comment Version (August 23, 2016)

Assessment of Fair Housing Tool for Local Governments

Table of Contents

1	
2	
3	I. Cover Sheet
4	II. Executive Summary
5	III. Community Participation Process
6	IV. Assessment of Past Goals and Actions
7	V. Fair Housing Analysis
8	A. Demographic Summary
9	B. General Issues
10	i. Segregation/Integration
11	ii. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)
12	iii. Disparities in Access to Opportunity
13	iv. Disproportionate Housing Needs
14	C. Publicly Supported Housing Analysis
15	D. Disability and Access Analysis
16	E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis
17	F. Small Program Participant Insert A (Only completed when a QPHA is collaborating with a local
18	government)
19	G. Small Program Participant Insert B (Only completed when a smaller local government that meets
20	the specifications outlined in V(F) and VII(A) collaborates with another local government)
21	VI. Fair Housing Goals and Priorities
22	VII. Appendices and Instructions
23	A. Instructions
24	B. Appendix A – HUD-Provided Maps
25	C. Appendix B – HUD-Provided Tables
26	D. Appendix C – Descriptions of Potential Contributing Factors
27	

1 **I. Cover Sheet**

- 2 1. Submission date:
- 3 2. Submitter name:
- 4 3. Type of submission (*e.g.*, single program participant, joint submission):
- 5 4. Type of program participant(s) (*e.g.*, consolidated plan participant, PHA):
- 6 5. For PHAs, Jurisdiction in which the program participant is located:
- 7 6. Submitter members (if applicable):
- 8 7. Sole or lead submitter contact information:
- 9 a. Name:
- 10 b. Title:
- 11 c. Department:
- 12 d. Street address:
- 13 e. City:
- 14 f. State:
- 15 g. Zip code:
- 16 8. Period covered by this assessment:
- 17 9. Initial, amended, or renewal AFH:
- 18 10. To the best of its knowledge and belief, the statements and information contained herein are true,
19 accurate, and complete and the program participant has developed this AFH in compliance with
20 the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the
21 Department of Housing and Urban Development;
- 22
- 23 11. The program participant will take meaningful actions to further the goals identified in its AFH
24 conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§
25 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o), and 903.15(d), as
26 applicable.
- 27

28 (Signature) (date)

29 (Signature) (date)

30 (Signature) (date)

- 31
- 32
- 33 12. Departmental acceptance or non-acceptance:

34 (Signature) (date)

35

36 Comments

II. Executive Summary

1. Summarize the fair housing issues, significant contributing factors, and goals. Also include an overview of the process and analysis used to reach the goals.

III. Community Participation Process

1. Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board and other resident outreach.
2. Provide a list of organizations consulted during the community participation process,
3. How successful were the efforts at eliciting meaningful community participation? If there was low participation, provide the reasons.
4. Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.

IV. Assessment of Past Goals, Actions and Strategies

1. Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:
 - a. Discuss what progress has been made toward their achievement.
 - b. Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences).
 - c. Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced.
 - d. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.

V. Fair Housing Analysis

[Note to Public: Where HUD has not provided data for a specific question and program participants do not have local knowledge or local data that is relevant to answering the question and as otherwise outlined in 24 C.F.R. § 5.152, participants may note the lack of such available information. Program participants should not leave the response blank.]

A. Demographic Summary

1. Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).
2. Describe the location of homeowners and renters in the jurisdiction and region, and describe trends over time.

B. General Issues

i. Segregation/Integration

1. Analysis

- a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.
- b. Identify areas in the jurisdiction and region with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.
- c. Explain how these segregation levels and patterns in the jurisdiction and region have changed over time (since 1990).
- d. Consider and describe the location of owner and renter occupied housing in the jurisdiction and region in determining whether such housing is located in segregated or integrated areas.
- e. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future. Participants should focus on patterns that affect the jurisdiction and region rather than creating an inventory of local laws, policies, or practices.

2. Additional Information

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.
- b. The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and mobility options for protected class groups.

3. Contributing Factors of Segregation

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.

- Community opposition
- Displacement of residents due to economic pressures

- Lack of community revitalization strategies
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of regional cooperation
- Land use and zoning laws
- Lending Discrimination
- Location and type of affordable housing
- Occupancy codes and restrictions
- Private discrimination
- Other

ii. R/ECAPs

1. Analysis

- a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction and region.
- b. Which protected classes disproportionately reside in R/ECAPs compared to the jurisdiction and region?
- c. Describe how R/ECAPs have changed over time in the jurisdiction and region (since 1990).

2. Additional Information

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics.
- b. The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and mobility options for protected class groups.

3. Contributing Factors of R/ECAPs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.

- Community opposition
- Deteriorated and abandoned properties
- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of regional cooperation
- Land use and zoning laws
- Location and type of affordable housing
- Occupancy codes and restrictions

- Private discrimination
- Other

iii. Disparities in Access to Opportunity

1. Analysis

a. Education

- i. For the protected class group(s) HUD has provided data, describe any disparities in access to proficient schools in the jurisdiction and region.
- ii. For the protected class group(s) HUD has provided data, describe how the disparities in access to proficient schools relate to residential living patterns in the jurisdiction and region.
- iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss programs, policies, or funding mechanisms that affect disparities in access to proficient schools.

b. Employment

- i. For the protected class group(s) HUD has provided data, describe any disparities in access to jobs and labor markets by protected class groups in the jurisdiction and region.
- ii. For the protected class group(s) HUD has provided data, describe how disparities in access to employment relate to residential living patterns in the jurisdiction and region.
- iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to employment.

c. Transportation

- i. For the protected class group(s) HUD has provided data, describe any disparities in access to transportation related to costs and access to public transit in the jurisdiction and region.
- ii. For the protected class group(s) HUD has provided data, describe how disparities in access to transportation related to residential living patterns in the jurisdiction and region.
- iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to transportation.

d. Access to Low Poverty Neighborhoods

- i. For the protected class group(s) HUD has provided data, describe any disparities in access to low poverty neighborhoods in the jurisdiction and region.

- ii. For the protected class group(s) HUD has provided data, describe how disparities in access to low poverty neighborhoods relate to residential living patterns of those groups in the jurisdiction and region?
- iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to low poverty neighborhoods.

e. Access to Environmentally Healthy Neighborhoods

- i. For the protected class group(s) HUD has provided data, describe any disparities in access to environmentally healthy neighborhoods in the jurisdiction and region.
- ii. For the protected class group(s) HUD has provided data, describe how disparities in access to environmentally healthy neighborhoods relate to residential living patterns in the jurisdiction and region?
- iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to environmentally healthy neighborhoods.

f. Patterns in Disparities in Access to Opportunity

- i. For the protected class group(s) HUD has provided data, identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors.
- ii. Identify areas that experience an aggregate of low access to opportunity and high exposure to adverse factors. Include how these patterns compare to patterns of segregation and R/ECAPs. Describe these patterns for the jurisdiction and region.

2. Additional Information

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.
- b. The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).

3. Contributing Factors of Disparities in Access to Opportunity

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

- Access to financial services
- Lack of private investments in specific neighborhoods

- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of regional cooperation
- Land use and zoning laws
- Lending Discrimination
- Location and type of affordable housing
- Location of employers
- Location of environmental health hazards
- Location of proficient schools and school assignment policies
- Occupancy codes and restrictions
- Private discrimination
- The availability, type, frequency, and reliability of public transportation
- Other

iv. Disproportionate Housing Needs

1. Analysis

- a. Which protected class groups (by race/ethnicity and familial status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups for the jurisdiction and region? Which groups also experience higher rates of severe housing burdens when compared to other groups?
- b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?
- c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing for the jurisdiction and region.
- d. Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.

2. Additional Information

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.
- b. The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA's overriding housing needs analysis.

3. Contributing Factors of Disproportionate Housing Needs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs.

- Availability of affordable units in a range of sizes
- Displacement of residents due to economic pressures
- Lack of housing support for victims of sexual harassment, including victims of domestic violence
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Land use and zoning laws
- Lending Discrimination
- Other

C. Publicly Supported Housing Analysis

1. Analysis

a. Publicly Supported Housing Demographics

- i. Are certain racial/ethnic groups more likely to be residing in one category of publicly supported housing than other categories (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and Housing Choice Voucher (HCV)) in the jurisdiction? Compare the racial/ethnic demographics of each category of publicly supported housing for the jurisdiction to the demographics of the same category in the region.
- ii. Compare the demographics, in terms of protected class, of residents of each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant category of publicly supported housing in the jurisdiction and region. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

b. Publicly Supported Housing Location and Occupancy

- i. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs in the jurisdiction and region.
- ii. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs in the jurisdiction and region?
- iii. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs in the jurisdiction and region?
- iv. (A) Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category for the jurisdiction? Describe how these developments differ.

(B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing for the jurisdiction and region.

- v. Compare the demographics of occupants of developments, for each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. For the jurisdiction, describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

c. Disparities in Access to Opportunity

- i. Describe any disparities in access to opportunity for residents of publicly supported housing in the jurisdiction and region, including within different program categories (public housing, project-based Section 8, Other HUD Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.

2. Additional Information

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.
- b. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or mobility programs.

3. Contributing Factors-of Publicly Supported Housing Location and Occupancy

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

- Admissions and occupancy policies and procedures, including preferences in publicly supported housing
- Community opposition
- Impediments to mobility
- Lack of private investment in specific neighborhoods
- Lack of public investment in specific neighborhoods, including services and amenities
- Lack of regional cooperation
- Land use and zoning laws

- Occupancy codes and restrictions
- Quality of affordable housing information programs
- Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
- Source of income discrimination
- Other

D. Disability and Access Analysis

1. Population Profile

- a. How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?
- b. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges for the jurisdiction and region.

2. Housing Accessibility

- a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.
- b. Describe the areas where affordable accessible housing units are located. Do they align with R/ECAPs or other areas that are segregated for the jurisdiction and region?
- c. To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing for the jurisdiction and region?

3. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

- a. To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?
- b. Describe the range of options for persons with disabilities to access affordable housing and supportive services in the jurisdiction and region.

4. Disparities in Access to Opportunity

- a. To what extent are persons with disabilities able to access the following in the jurisdiction and region? Identify major barriers faced concerning:
 - i. Government services and facilities
 - ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

- iii. Transportation
 - iv. Proficient schools and educational programs
 - v. Jobs
- b. Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.
 - c. Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities in the jurisdiction and region.

5. Disproportionate Housing Needs

Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities in the jurisdiction and region.

6. Additional Information

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region including those affecting persons with disabilities with other protected characteristics.
- b. The program participant may also describe other information relevant to its assessment of disability and access issues.

7. Disability and Access Issues Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.

- Access to proficient schools that are accessible for persons with disabilities
- Access to publicly supported housing for persons with disabilities
- Access to transportation for persons with disabilities
- Inaccessible public or private infrastructure
- Lack of affordable in-home or community-based supportive services
- Lack of affordable, accessible housing in range of unit sizes
- Lack of affordable, integrated housing for individuals who need supportive services
- Lack of assistance for housing accessibility modifications
- Lack of assistance for transitioning from institutional settings to integrated housing
- Land use and zoning laws
- Lending Discrimination
- Location of accessible housing

- Occupancy codes and restrictions
- Regulatory barriers to providing housing and supportive services for persons with disabilities
- State or local laws, policies, or practices that discourage individuals with disabilities from being placed in or living in apartments, family homes, and other integrated settings
- Other

E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

1. List and summarize any of the following that have not been resolved: a charge or letter of finding from HUD concerning a violation of a civil rights-related law, a cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law, a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law, or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.
2. Describe any state or local fair housing laws. What characteristics are protected under each law?
3. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

4. Additional Information

- a. Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.
- b. The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.

5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing enforcement, outreach capacity, and resources and the fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

- Lack of local private fair housing outreach and enforcement
- Lack of local public fair housing enforcement
- Lack of resources for fair housing agencies and organizations
- Lack of state or local fair housing laws
- Unresolved violations of fair housing or civil rights law
- Other

F. Small Program Participant Insert A - Qualified PHA

[Note to Public: This section is only to be completed when a Qualified PHA partners with a Local Government. For QPHAs in the same CBSA as the Local Government, the analysis is intended to meet the requirements of a QPHA service area analysis while relying on the Local Government to complete the regional analysis. For QPHAs whose service area extends beyond, or is outside of, the Local Government’s CBSA, the analysis must cover the QPHA’s service area and region. QPHAs should refer to the Contributing Factors listed in each section above and will have to identify Contributing Factors. QPHAs must also identify any individual goals.]

1. Segregation/Integration

Describe any areas of segregation and integration in the QPHA’s service area (and region, if applicable). Identify the protected class groups living in any such area. Explain how any area of segregation has changed over time.

2. R/ECAPs

Describe the locations of R/ECAPs, if any, in the QPHA’s service area (and region, if applicable). Identify the protected class groups living in R/ECAPs and describe how R/ECAPs have changed over time.

3. Disparities in Access to Opportunity

Describe any disparities in access to the following opportunities for households in the service area (and region, if applicable), based on protected class:

- Educational opportunities
- Employment opportunities
- Transportation opportunities
- Low poverty exposure opportunities
- Environmentally healthy neighborhood opportunities

4. Disproportionate Housing Needs

Describe which protected class groups in the PHA’s service area (and region, if applicable) experience higher rates of housing problems (housing cost burden, severe housing cost burden, substandard housing conditions, and overcrowding).

5. Publicly Supported Housing Section

Questions on the location and occupancy of the QPHA’s publicly supported housing

a. Demographics

Provide demographic information, including protected class groups, on the residents of the QPHA and compare these with the demographics of the service area (and region, if applicable).

b. Segregation and R/ECAPs

- i. Describe the location of the QPHA's developments and Housing Choice Vouchers in relation to areas of segregation and R/ECAPs in the service area (and region, if applicable).
- ii. If there are R/ECAPs, describe any differences in the demographics, including by protected class group, of QPHA assisted households who live in R/ECAPs versus those who live outside of R/ECAPs in the service area (and region, if applicable).
- iii. Describe the demographics, by protected class group, of each of the QPHA's publicly supported developments.

c. Disparities in Access to Opportunity

Describe the extent to which assisted households of the QPHA have access to the opportunity assets discussed above. Identify any disparities in access to each opportunity by protected class group in the service area (and region, if applicable).

d. Disproportionate Housing Needs

- i. Compare the demographics, including by protected class group, of the QPHA's assisted households to households in the service area with disproportionate housing needs in the service area (and region, if applicable).
- ii. Compare the needs of families with children in the Qualified PHA's service area (and region, if applicable) for housing units with two, and three or more bedrooms, with the QPHA's available stock of assisted units.

e. Policies and Practices

Describe any policies and practices of the QPHA related to fair housing choice including:

- Affirmative marketing plan
- Admissions preferences or housing designations
- Voucher mobility and portability policies and practices

f. Questions on other categories of publicly supported housing

Describe other publicly supported housing programs, if any, in the QPHA service area. Identify the location by category of publicly supported housing in relation to areas of segregation and R/ECAPs, and the demographics of the households of each category of publicly supported housing, by protected class in the service area (and region, if applicable).

6. Disability and Access

- a. Describe how persons with disabilities are geographically dispersed or concentrated in the QPHA service area (and region, if applicable), including whether persons with disabilities reside in R/ECAPs and other segregated areas identified previously, and describe whether these geographic patterns vary for persons with each type of disability of persons with disabilities in different age ranges.

- b. Describe whether the QPHA's service area (and region, if applicable) has sufficient affordable, accessible housing in a range of unit sizes, describe the areas where affordable accessible housing units are located, and identify to what extent persons with different disabilities are able to access and live in the different categories of publicly supported housing.
- c. Describe to what extent persons with disabilities in the QPHA's service area (and region, if applicable) reside in segregated or integrated settings.

7. Fair Housing Enforcement

Describe whether the PHA is currently the subject of any of the following: a charge or letter of finding from HUD concerning a violation of a civil rights-related law, a cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law, a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law, or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.

8. Additional QPHA Information

The QPHA may also describe other information relevant to its assessment of fair housing

G. Small Program Participant Insert B – Local Government

[Note to Public: This section is only to be completed when either: (1) A local government that received a CDBG grant of \$500,000 or less in the most recent fiscal year prior to the due date for the joint or regional AFH collaborates with a local government that received a CDBG grant larger than \$500,000 in the most recent fiscal year prior to the due date for the joint or region AFH; or (2) A HOME consortia whose members collectively received less than \$500,000 in CDBG funds or received no CDBG funding partners with a with a local government that received a CDBG grant larger than \$500,000 in the most recent fiscal year prior to the due date for the joint or region AFH.]

For small program participants in the same CBSA as the lead Local Government, the analysis is intended to meet the requirements of jurisdictional analysis while relying on the lead Local Government to complete the regional analysis. For small program participants whose service area extends beyond, or is outside of, the lead Local Government's CBSA, the analysis must cover the small program participant's jurisdiction and region. Small program participants should refer to the Contributing Factors listed in each section above and will have to identify Contributing Factors. Small program participants must also identify any individual goals.]

1. Demographics

Describe demographic patterns in the jurisdiction (and region, if applicable). Explain how demographic trends have changed over time?

2. Segregation/Integration

Describe any areas of segregation and integration in the jurisdiction (and region, if applicable). Identify the protected class groups living in any such areas. Explain how areas of segregation have changed over time.

3. R/ECAPs

Describe the locations of R/ECAPs, if any, in the jurisdiction (and region, if applicable). Identify the protected class groups living in R/ECAPs and describe how R/ECAPs have changed over time.

4. Disparities in Access to Opportunity

Describe any disparities in access to the following opportunities for households in the jurisdiction (and region, if applicable), based on protected class:

- Educational opportunities
- Employment opportunities
- Transportation opportunities
- Low poverty exposure opportunities
- Environmentally healthy neighborhood opportunities

5. Disproportionate Housing Needs

Describe which protected class groups in the jurisdiction (and region, if applicable) experience higher rates of housing problems (housing cost burden, severe housing cost burden, substandard housing conditions, and overcrowding).

6. Publicly Supported Housing Section

a. Publicly Supported Housing Demographics

Compare the demographic population, including protected class groups, on residents living in publicly supported housing and compare these with the demographics to the population in general in the jurisdiction (and region, if applicable). Are certain protected class groups more likely to be residing in one category of publicly supported housing than other categories?

b. Segregation and R/ECAPs

- i. Describe the location of publicly supported housing in relation to areas of segregation and R/ECAPs in the jurisdiction (and region, if applicable).
- ii. If there are R/ECAPs, describe any differences in the demographics, including by protected class group, of assisted households who live in R/ECAPs versus those who live outside of R/ECAPs in the jurisdiction (and region, if applicable).
- iii. Describe the demographics, by protected class group, of each of the publicly supported housing developments in the jurisdiction (and region, if applicable).

c. *Disparities in Access to Opportunity*

Describe the extent to which assisted households in publicly supported housing in the jurisdiction (and region, if applicable) have access to the opportunity assets discussed above. Identify any disparities in access to each opportunity by protected class group.

d. Disproportionate Housing Needs

- i. Which protected class groups experience higher rates of housing cost burden, overcrowding, or substandard housing in the jurisdiction (and region, if applicable) when compared to other groups, and how do these groups align with segregated areas, integrated areas, and R/ECAPs.
- ii. Compare the needs of families with children in the jurisdiction (and region, if applicable) for housing units with two, and three or more bedrooms, with the available stock of assisted units.

e. Questions on other categories of publicly supported housing

Describe other publicly supported housing programs, if any, in the jurisdiction (and region, if applicable). Identify the location by category of publicly supported housing in relation to areas of segregation and R/ECAPs, and the demographics of the households of each category of publicly supported housing, by protected class.

7. Disability and Access

- a. Describe how persons with disabilities are geographically dispersed or concentrated in the jurisdiction (and region, if applicable), including whether persons with disabilities reside in R/ECAPs and other segregated areas identified previously, and describe whether these geographic patterns vary for persons with each type of disability of persons with disabilities in different age ranges.
- b. Describe whether the jurisdiction (and region, if applicable) has sufficient affordable, accessible housing in a range of unit sizes, describe the areas where affordable accessible housing units are located, and identify to what extent persons with different disabilities are able to access and live in the different categories of publicly supported housing.
- c. Describe to what extent persons with disabilities in the jurisdiction (and region, if applicable) reside in segregated or integrated settings.

8. Fair Housing Enforcement

Describe whether the program participant is currently the subject of any of the following: a charge or letter of finding from HUD concerning a violation of a civil rights-related law, a cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law, a letter of findings issued by or

lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law, or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.

9. Additional Program Participant Information

The program participant may also describe other information relevant to its assessment of fair housing.

VI. Fair Housing Goals and Priorities

1. For each fair housing issue, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.
2. For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.

<u>Goal</u>	<u>Contributing Factors</u>	<u>Fair Housing Issues</u>	<u>Metrics, Milestones, and Timeframe for Achievement</u>	<u>Responsible Program Participant(s)</u>
Discussion:				

Assessment of Fair Housing (AFH) Instructions

Introduction

Program participants conducting an assessment of fair housing as required under the affirmatively furthering fair housing rule, published at 80 FR 42272, are required to complete and submit an Assessment Tool. For regulatory requirements of the AFFH rule and the AFH, see 24 C.F.R. §§ 5.150-5.180.

This Assessment Tool, including these instructions, will be used by local governments that receive Community Development Block Grants (CDBG), HOME Investment Partnerships Program (HOME), Emergency Solutions Grants (ESG), or Housing for Persons with AIDS (HOPWA) formula funding from HUD when conducting and submitting their own Assessment of Fair Housing (AFH). The Assessment Tool will also be used for AFHs conducted by joint and regional collaborations between: (1) local governments; (2) one or more local governments with one or more public housing agency (PHA) partners; and (3) other collaborations in which a local government (described above) is designated as the lead entity for the collaboration. A joint or regional AFH does not relieve such collaborating program participant from its obligation to analyze and address local and regional fair housing issues and contributing factors that affect fair housing choice, and set priorities and goals for its geographic area. Program participants that conduct and submit either a joint or regional AFH must provide HUD with a copy of their written agreement prior to submitting the AFH. Please see the following chart identifying which program participants will use this Assessment Tool, and the program participants that will use a different Assessment Tool.

Who must use this Assessment Tool	Who will use a different Assessment Tool
<p>1. Local governments (that receive CDBG, HOME, ESG or HOPWA funds) submitting an AFH alone.</p> <p>2. Joint or Regional Collaborations between:</p> <p>a. Only local governments</p> <p>b. One or more local governments with one or more PHAs</p> <p>c. Other collaborations in which a local government is designated as the lead entity, including small program participants (i.e., local governments that received a CDBG grant of \$500,000 or less in the most recent fiscal year prior to the due date for the joint or regional AFH due date) electing to complete the applicable insert.</p>	<p>1. States and Insular Areas submitting alone</p> <p>2. Joint or regional collaborations (with local governments and/or PHAs) where the State is designated as the lead entity</p> <p>3. PHAs submitting alone</p> <p>4. Joint collaborations among only PHAs</p>

All program participants must use the HUD-provided data, which includes data for the jurisdiction and region, to complete the AFH. A joint or regional AFH must reference the HUD-provided data for each program participant's jurisdiction and region. The Assessment Tool and HUD-provided data will be used by various types of program participants (e.g. those in urban areas, rural areas, suburban areas, majority-minority communities), which may have unique characteristics, issues and challenges. The HUD-provided data will help program participants assess local and regional fair housing issues and contributing factors and set priorities and goals to overcome them. However, certain HUD-provided data may have limitations, including limitations in how they apply to geographic areas with different characteristics (e.g., rural versus urban, majority minority areas). For this reason, program participants must supplement the HUD-provided data with local data and local knowledge outlined in 24 C.F.R. § 5.152 and discussed below.

HUD is only able to provide data for those protected class groups for which nationally uniform data are available. For this reason, some questions focus on specific protected classes based on the availability of such data. For those questions, local data and local knowledge may provide information to supplement the analysis for protected classes not covered by the HUD-provided data. Local data and local knowledge can be particularly helpful when program participants have local data that are more up-to-date or more accurate than the HUD-provided data or when the HUD-provided data do not cover all of the protected classes that would be relevant to program participants' analyses.

Although HUD will provide nationally available data to program participants, the regulations recognize the value of local data and knowledge. Local data is defined in the Final Rule at 24 C.F.R. § 5.152, and refers to metrics, statistics, and other quantified information, subject to a determination of statistical validity by HUD, that are relevant to program participants' geographic areas of analyses, can be found through a reasonable amount of searching, are readily available at little or no cost, and are necessary for the completion of the AFH using the Assessment Tool. Examples of local data include relevant demographic data or program-related data maintained by program participants, another public agency, or another entity that are readily available and easily accessible to program participants at little or no cost.

Local knowledge is defined in the Final Rule at 24 C.F.R. § 5.152, and means information to be provided by program participants that relates to program participants' geographic areas of analyses and that is relevant to program participants' AFH, is known or becomes known to program participants, and is necessary for the completion of the AFH using the Assessment Tool. Examples of local knowledge include laws and policies, common neighborhood names and borders, and information about the housing market and housing stock. HUD does not expect program participants to review every possible source to search out local knowledge. However, local knowledge includes information obtained through the community participation process. Program participants are required to consider the information received during the community participation process as they conduct an AFH using the Assessment Tool.

Program participants are required to comply with the Privacy Act of 1974 (5 U.S.C. § 552a), and applicable State laws in the collection, maintenance, use and dissemination of personally identifiable information.

Program participants must use reasonable judgment in deciding what supplemental information from among the numerous sources available would be most relevant to their analysis. HUD does not expect program participants to hire statisticians or other consultants to locate and analyze all possible sources of local data. Program participants are not generally expected to conduct primary data gathering or analysis, or a quantitative impact evaluation requiring empirical research to

objectively determine causation. Note that, subject to the community participation, consultation and coordination process outlined in the Final Rule at 24 C.F.R. § 5.158, program participants are required to consider information relevant to the jurisdiction or region submitted during the community participation process, including recommendations of other data sources for program participants to assess. Program participants are required to consider the information received during the community participation process, but need not expend extensive resources in doing so. Note, however, that program participants must comply with the requirements for local data and local knowledge outlined in 24 C.F.R. § 5.152 and as discussed in these instructions.

In conducting the analysis, program participant must identify significant contributing factors reach section of the analysis. When identifying contributing factors, each section of the analysis contains a discrete list of suggested factors for consideration, which includes factors commonly associated with that section of the analysis. The list contains an “other” option, for program participants to use in identifying other significant contributing factors not included in the list. A more exhaustive list of possible contributing factors is contained in Appendix C, which also includes a description of each contributing factor. Program participants are permitted to include contributing factors that are not listed in Appendix C.

A contributing factor may be outside the ability of program participants to directly control or influence; however, such factors must be identified if they are significant. Identifying “external factors” and barriers to achieving goals is, among other things, a useful planning and performance management component. For program participants submitting jointly, each program participant is responsible for identifying contributing factors within its jurisdiction. These factors will be prioritized in Section VI and used as a basis for establishing goals.

The Assessment Tool also contains the required analysis of fair housing issues and contributing factors that program participants must undertake in order for an AFH to meet the requirements set forth in 24 C.F.R. §§ 5.150 through 5.180. The content required in the AFH can be found at 24 C.F.R. § 5.154 and is outlined in the applicable Assessment Tool for each program participant. However, please note that different program participants may work through the Assessment of Fair Housing in different ways. Depending on each program participants’ familiarity with fair housing planning and planning style, each program participant may choose to complete the required components of an Assessment of Fair Housing in a variety of ways. For example, while the AFFH rule requires that program participants identify significant contributing factors, prioritize such factors, and justify the prioritization of the contributing factors that will be addressed in the program participant’s fair housing goals, it does not specify a specific process for meeting these requirements. Program participants may choose to complete the AFH in any order they choose, so long as all requirements are met.

Part I: Cover Sheet with Certification

Complete the cover sheet with all requested information. The official authorized representative of each program participant must sign and date the certification.

All joint or regional participants are bound by the certifications, except that some of the analysis, goals, or priorities included in the AFH may only apply to an individual program participant as expressly stated in the AFH.

Part II: Executive Summary

To complete the Executive Summary, refer to fair housing contributing factors, issues and goals identified in parts IV and V of the Assessment Tool, as well as goals identified in the most recent previous Analyses of Impediments to Fair Housing Choice or Assessments of Fair Housing. There is no prescribed format for the Executive Summary—program participant(s) have discretion in this section as to how to summarize their findings in the AFH.

Part III: Community Participation Process

Complete all three questions based on the community participation, consultation and coordination process outlined in the Final Rule at 24 C.F.R. § 5.158. Program participants should employ communications means designed to reach the broadest possible audience. Such communications may be met as appropriate, by publishing a summary of each document in one or more newspapers of general circulation, and by making copies of each document available on the Internet, on program participants' official government Web sites, and as well at libraries, government offices, and public places.

Please note that for public housing agencies, community participation requirements are described in 24 C.F.R. §§ 903.13, 903.15, 903.17, and 903.19. For consolidated plan program participants, Citizen Participation requirements are described in 24 C.F.R. part 91. As required by applicable regulations, program participants must ensure meetings are held in physically accessible locations, provide appropriate auxiliary aids and services necessary to ensure effective communication with individuals with disabilities, and provide limited English proficient persons meaningful access to programs and services.

For question (1), provide a summary of the outreach activities undertaken. For PHAs, also include any meetings with the Resident Advisory Board, including residents of impacted developments proposed for demolition/disposition, required or voluntary conversion and conversion under RAD.

For question (2), provide a list of any organizations consulted during the community participation process. For consolidated plan program participants, 24 C.F.R. § 5.158(a)(1), states that consolidated plan program participants must follow the policies and procedures described in 24 C.F.R. part 91 (see 24 C.F.R. §§ 91.100, 91.105, 91.110, 91.115, 91.235, and 91.401). For PHAs, 24 C.F.R. § 5.158(a)(2) states that PHAs must follow policies and procedures described in 24 C.F.R. part 903.

For question (3), describe how successful the community participation process was, and provide an explanation for any low participation rates.

In question (4), pursuant to 24 C.F.R. § 5.154(d)(6), program participants must include an explanation for why any comments or views submitted through the community participation process were not accepted – note that this includes information, such as supplemental data and reports.

Part IV: Assessment of Past Goals, Actions, and Strategies

For question (1)(a), provide an explanation of what past goals program participants selected and what progress has been made toward their achievement. Use the metrics and milestones identified in past Analyses of Impediments or past Assessments of Fair Housing in assessing progress. New program participants may still answer this question based on any other relevant planning documents and/or any past fair housing goals, actions, or strategies.

To answer question (1)(b), explain how the past goals selected influenced the selection of current goals.

For question (1)(c), program participants may provide any additional information about policies, actions, or steps that address fair housing issues in program participants' geographic areas of analyses.

Part V: Fair Housing Analysis

For all questions, program participants must use the HUD-provided data and supplement that information with local data and local knowledge when it meets the criteria under 24 C.F.R. § 5.152 (described above). HUD-provided maps are located in Appendix A and HUD-provided tables are located in Appendix B.

Where HUD has not provided data for a specific question in the Assessment Tool and program participants do not have local data or local knowledge that would assist in answering the question, program participants are expected to note this rather than leaving the question blank.

A. Demographic Summary

For question (1), refer to Tables 1 and 2, which present demographic summary data for the jurisdiction and region. The demographics analyzed must include an overview of: racial/ethnic populations; national origin populations, including any limited English proficient populations; individuals with disabilities by disability type; and families with children.

For question (2), local data and local knowledge may be particularly useful in answering this question. Include any geographic patterns in the location of owner-occupied properties compared to renter-occupied properties over time. Program participants may also describe trends in the availability of affordable housing in the jurisdiction and region for that time period.

B. Fair Housing Issue Analysis

Segregation/Integration

For questions (1)(a) and (1)(b), refer to Table 3. Table 3 presents the dissimilarity index for the jurisdiction and region for white/non-white, black/white, Hispanic/white, and Asian/white populations for multiple census years.

This dissimilarity index measures the degree to which two groups are evenly distributed across a geographic area and is commonly used for assessing residential segregation between two groups. Values range from 0 to 100, where higher numbers indicate a higher degree of segregation among the two groups measured.

Dissimilarity index values between 0 and 39 generally indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation. However, context is important in interpreting the dissimilarity index. The index does not indicate spatial patterns of segregation, just the relative degree of segregation; and, for populations that are small in absolute numbers, the dissimilarity index may be high even if the group's members are evenly distributed throughout the area. Generally, when a group's population is less than 1,000, program participants should exercise caution in interpreting associated dissimilarity indices. Also, because the index measures only two groups at a time, it is

less reliable as a measure of segregation in areas with multiple demographic groups. For question 1(a) indicate whether the measures shown generally indicate that segregation in the jurisdiction and region is low, moderate or high for each racial/ethnic group represented in Table 3, and note which groups experience the highest levels of segregation.

For question 1(b), refer to Table 3, which also provides dissimilarity index values for 1990, 2000, and 2010. Note whether the dissimilarity index values have increased or decreased over time. Increasing values may indicate increasing segregation, and decreasing values may indicate decreasing segregation.

For question (1)(c), refer to Maps 1, 3, and 4. Maps 1, 3, and 4 are dot density maps showing the residential distribution of racial/ethnic, national origin, and limited English proficient (LEP) populations in the jurisdiction and region. A dot density map (also known as dot distribution map) uses a color-coded dot symbols representing the presence of a specified number of individuals sharing a particular characteristic to show a spatial pattern. The presence of residential segregation may appear as clusters of a single color of dots representing one protected class, or as clusters of more than one color of dots representing a number of protected classes but still excluding one or more protected classes. More integrated areas will appear as a variety of colored dots.

While dot density maps are useful in demonstrating residential patterns, they also have limitations. Dot placement does not represent actual addresses – rather individual dots are randomly located within a particular census block to match aggregate population totals for that block group. Note also that the data provided for national origin is based on census data for the 5 most populous “foreign born” populations by country of origin, however, some jurisdictions may have other significant populations not included in the HUD-provided data but reflected in local data or local knowledge. In addition, the “foreign born” population does not track exactly with the definition of national origin under the Fair Housing Act, which includes place of birth as well as place of ancestor’s birth. LEP data shows residential segregation by language for speakers of the five most populous limited English proficient groups in the jurisdiction and region. Again, some jurisdictions may have other significant populations not included in the HUD-provided data but reflected in local data or local knowledge.

For question (1)(c), refer to Maps 1,3, and 4 to identify areas on the map that reveal clusters of race/ethnicity, national origin, or LEP groups, and areas where the map indicates are particularly integrated. In identifying those areas, and all areas throughout the tool, use commonly used neighborhood or area names.

For question (1)(d), local data and local knowledge may be particularly useful in answering this question.

For question (1)(e) refer to Maps 1 and 2, and Tables 1 and 2. Map 2 depicts racial/ethnic dot density distribution for previous years (1990 and 2000). A comparison of the patterns shown in Map 2 to the patterns shown in Map 1 may reveal changes in patterns of segregation by race/ethnicity over time. For instance, the comparison may show that an area previously occupied predominantly by one racial/ethnic group is now more integrated. Consider these changes in conjunction with Tables 1 and 2 showing changes in overall demographics over time, as well as local knowledge about local policies, practices, trends, and investments to answer question 1(e).

For question (1)(f), local data and local knowledge may be particularly useful in answering this question.

Understanding the limitations of the HUD-provided data discussed in the introduction to these instructions, using local data and knowledge, complete question (2)(a). The Fair Housing Act protects individuals on the basis of race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability. HUD has provided data for this section only on race/ethnicity and national origin. Include any relevant information about other protected characteristics - such as characteristics protected by State or local law (*e.g.*, source of income protection, LGBT protection, among others). Note, the analysis of disability is specifically considered in Section V(D). Program participants may include relevant information relating to persons with disabilities here, but still must address the questions in Section V(D).

For question (2)(b), program participants may include any additional relevant information related to their analysis of segregation in the jurisdiction and region, including the removal of barriers that prevent people from accessing housing in areas of opportunity, the development of affordable housing in such areas, housing mobility programs, housing preservation, and community revitalization efforts, where any such actions are designed to achieve fair housing outcomes such as increasing integration.

For question (3), identify all significant contributing factors. Consider the non-exhaustive list of factors provided and identify those factors that significantly create, contribute to, perpetuate, or increase the severity of segregation. For additional instructions on selecting contributing factors, refer to the introduction of these instructions.

R/ECAPs

For question (1)(a), refer to Maps 1, 3 and 4, which include outlined census tracts that meet the threshold criteria for racially or ethnically concentrated areas of poverty (R/ECAPs). The area within the outline meets the definition of an R/ECAP, as set forth in the rule at 24 C.F.R. § 5.152.

To answer question (1)(b), use Maps 1, 3, and 4 and Table 4. Maps 1, 3, and 4 are dot density maps showing the residential distribution of racial/ethnic, national origin, and limited English proficient (LEP) populations in the jurisdiction and region. These maps also include outlined overlays of R/ECAPs. The presence of residential segregation in R/ECAPs may appear as clusters of a single color of dots representing one protected class, or as clusters of more than one color of dots representing a number of protected classes but still excluding one or more protected classes. More integrated areas will appear as a variety of colored dots. Table 4 shows the percentage of persons living in R/ECAPS with certain protected characteristics (race/ethnicity, families with children, national origin) in the jurisdiction and the region. Note that the percentages reflect the proportion of the total population living in R/ECAPs that has a protected characteristic, not the proportion of individuals with a particular protected characteristic living in R/ECAPs. Table 4 can be compared to Table 1, which shows the total population in the jurisdiction and region for each of the groups shown in Table 4.

To answer question (1)(c), refer to Maps 1 and 2. Map 1 shows the outlines of current R/ECAPs. Map 2 shows the outlines of R/ECAPs in past years (1990 and 2000). Compare the current R/ECAP outlines with previous R/ECAP outlines and describe whether R/ECAPs have remained constant, whether new R/ECAPs have emerged, or whether certain R/ECAPs no longer exist. Maps 1, 2, and 3 also show dot density distributions by race/ethnicity, national origin and LEP, including R/ECAP outlines. Note whether the maps show any changes in areas that have moved in or out of R/ECAP status over time and the groups most affected by R/ECAPs.

Understanding the limitations of the HUD-provided data discussed in the instruction's introduction, using local data and knowledge, complete question (2)(a). The Fair Housing Act protects individuals on the basis of race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability. HUD has provided data for this section only on race/ethnicity and national origin. Include any relevant information about other protected characteristics, but note that the analysis of disability is specifically considered in Section V(D). Program participants may include relevant information relating to persons with disabilities here, but still must address the questions in Section V.(D).

For question (2)(b), program participants may include any additional relevant information related to their analysis of R/ECAPs in the jurisdiction and region, including the removal of barriers that prevent people from accessing housing in areas of opportunity, the development of affordable housing in such areas, housing mobility programs, housing preservation and community revitalization efforts, where any such actions are designed to achieve fair housing outcomes such as transforming R/ECAPs by addressing the combined effects of segregation and poverty. Relevant information may also include local assets and organizations.

For question (3), consider the non-exhaustive list of factors provided, which are those most commonly associated with R/ECAPs, and identify those factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs. For additional instructions on selecting contributing factors, refer to the introduction of these instructions

Disparities in Access to Opportunity

The Fair Housing Act prohibits discrimination on the basis of race, color, religion, sex, familial status, national origin, and disability. As noted, HUD provides to program participants certain nationally-uniform data in the form of maps and tables to answer specific questions. Where HUD does not provide maps and tables, program participants must supplement the HUD-provided data with local data and local knowledge outlined in 24 C.F.R. § 5.152. In this section of the Assessment Tool, HUD asks specific questions about disparities for protected classes for which HUD is providing data and notes in these instructions which HUD-provided maps and tables should be used to answer particular questions. Note, however, that Question 2(a) asks about these disparities in access to opportunity for all protected classes using local data and local knowledge beyond the HUD-provided data.

Using the Opportunity Indices

Questions in this section rely on the Opportunity Indices in the HUD-provided data. Table 12 provides index values for the following opportunity indicator indices: Low Poverty; School Proficiency; Labor Market Engagement; Jobs Proximity; Low Transportation Costs; Transit Trips Index; and Environmental Health. The Opportunity Indices are provided by race/ethnicity, including for income adjusted comparisons (i.e. households below the poverty line by race/ethnicity). A higher value on each of the indices would indicate: higher levels of school proficiency; higher levels of labor engagement; closer proximity to jobs; lower transportation costs; better access to public transportation; lower neighborhood poverty rates; and greater neighborhood environmental quality (i.e., lower exposure rates to harmful toxins). Using the indices provided, program participants will be able to compare access to key opportunity assets with relative ease by consulting a single table. These indices are based on nationally available data sources.

For the questions that rely on the Opportunity Indices (Table 12), the HUD-provided data includes information for protected class groups by race/ethnicity. For the questions that rely on the

Opportunity Maps (Maps 9-15), the HUD-provided data includes information on protected class groups by race/ethnicity, national origin and familial status. There is one map for each Opportunity Index. All of these maps also show R/ECAP boundaries and are provided for both the jurisdiction and region.

Education

For the questions in (1)(a)(i), use the School Proficiency Index in Table 12. The School Proficiency Index measures which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. The values for the School Proficiency Index are determined by the performance of 4th grade students on state exams.¹ The Index uses data for elementary schools because they are much more likely to have neighborhood-based enrollment policies. Note that local data or local knowledge may be useful in assessing access to higher-grade level schools.

For question (1)(a)(ii), refer to Map 9, which shows residential living patterns by race/ethnicity, national origin, and familial status. The map can be used to assess how residency patterns for each of these protected classes compares to the location of proficient schools. The map shows values for the School Proficiency Index with shading at the neighborhood (census tract) level. Darker shaded tracts indicate better access to higher proficiency schools. Lighter shading indicates lower index values, with these neighborhoods being near lower performing elementary schools (as measured by the Index).

Note that, to the extent the questions require consideration of middle and high schools, or local policies and practices such as school enrollment policies, then local knowledge (as defined at 24 C.F.R. § 5.152) will be relevant.

Question (1)(a)(iii), may be answered using local data or local knowledge. Program participants should consider whether local school policies provide for alternative means of access to schools, such as local enrollment policies, that are not reflected in the HUD-provided data.

Employment

For the questions (1)(b)(i), refer to the Jobs Proximity Index and Labor Market Engagement Index in Table 12. The Jobs Proximity Index measures the physical distances between place of residence and jobs by race/ethnicity. The Labor Market Engagement Index provides a measure of unemployment rate, labor-force participation rate, and percent of the population ages 25 and above with at least a bachelor's degree, by neighborhood.

To answer questions (1)(b)(ii), refer to Maps 10 and 11. Maps 10 and 11 both show residency patterns of racial/ethnic and national origin groups and families with children. Map 10 shows values for the Jobs Proximity Index with shading at the neighborhood (census tract) level. Map 11 shows values for the Labor Market Engagement Index with shading at the neighborhood (census tract) level. Darker shaded tracts indicate a higher (better) value for the Index being used. Thus, darker shaded tracts would indicate closer proximity to jobs or a higher level of "labor engagement" (employment rate, labor-force participation rate, and percent of the population age 25

¹ The School Proficiency Index uses two methods for linking schools to census tracts: either 1) using the attendance area (where this information is available) of individuals sharing a protected characteristic; or 2) using the proficiency of elementary schools within 1.5 miles of individuals with a protected characteristic where attendance boundary data are not available

and above with at least a bachelor's degree) for the households living there. Lighter shaded tracts would show lower (worse) index values for these index measures.

Transportation

For the questions in (1)(c)(i), refer to Table 12 (Low Transportation Cost Index and the Transit Trips Index). The Low Transportation Cost Index measures cost of transportation and proximity to public transportation by neighborhood. The Transit Trips Index measures how often low-income families in a neighborhood use public transportation.

To answer questions (1)(c)(ii), refer to Maps 12 and 13. These maps both show residency patterns of racial/ethnic and national origin groups and families with children. Map 12 shows values for the Low Transportation Cost Index with shading at the neighborhood (census tract) level. Map 13 shows values for the Transit Trips Index with shading at the neighborhood (census tract) level. For these maps, darker shading in a tract indicates a higher (better) value for the Index being used. Thus, darker shaded tracts would indicate lower transportation costs or better access to public transit for the households living there. Lighter shaded tracts would show higher transportation costs and less access to transit.

For question (1)(c)(iii), program participants should consider whether transportation-related local programs, policies, and practices affect a person's access to proficient school, jobs, and other areas with opportunities. In answering this question, local knowledge (as defined at 24 C.F.R. § 5.152) will be relevant. Program participants should consider whether transportation systems designed for use of personal vehicles impact the ability of protected class groups' access to transportation due to the lack of vehicle ownership.

Access to Low Poverty Neighborhoods

For question (1)(d)(i), refer to the Low Poverty Index in Table 12. The Low Poverty Index measures concentration of poverty by neighborhood. In effect, a higher value on this index indicates a higher likelihood that a family may live in a low poverty neighborhood. A lower value on the Index indicates that households in the protected group have a higher likelihood of living in a neighborhood with higher concentrations of poverty.

For question (1)(d)(ii) use Map 14, which shows residency patterns of racial/ethnic and national origin groups and families with children. The map also shows values for the Low Poverty Index with shading at the neighborhood (census tract) level. Darker shading (i.e. a higher value on the index) in a tract indicates a lower level of poverty. Lighter shading in a tract indicates a lower (worse) value on the Index and thus a higher concentration of poverty in that tract.

For question (1)(d)(iv), to the extent local policies and practices are discussed, local knowledge (as defined at 24 C.F.R. § 5.152) will be relevant.

Access to Environmentally Healthy Neighborhoods

For question (1)(e)(i), refer to the Environmental Health Index in Table 12. The Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory and neurological toxins by neighborhood.

For question (1)(e)(ii), use Map 15, which shows residency patterns of racial/ethnic and national origin groups and families with children. The map also shows values for the Environmental Health

Index with shading at the neighborhood (census tract) level indicating levels of exposure to environmental health hazards for the jurisdiction and the region. To answer the question, examine t Map 15, by race/ethnicity, national origin, and familial status, to identify differences in exposure to environmental health hazards by protected characteristic. In general, Map 15 may be more useful in showing broader overall patterns, rather than in differences between individual neighborhoods.

While the Environment Health Index is limited to issues related to air quality, for these questions on environmentally healthy neighborhoods program participants may also discuss other indicators of environmental health, based on local data and local knowledge. Environmental-related policies may include the siting of highways, industrial plants, or waste sites.

Patterns in Disparities in Access to Opportunity

For question (1)(f)(i), refer to the answers provided in question (1)(a)-(e).

Additional Information

Understanding the limitations of the HUD-provided data discussed in the introduction to the instructions, using local data and knowledge, complete question (2)(a). The Fair Housing Act protects individuals on the basis of race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability. HUD has provided data for this section only on race/ethnicity, national origin, and familial status. Include any relevant information about other protected characteristics, but note that the analysis of disability is specifically considered in Section V(D). Program participants may include relevant information relating to persons with disabilities here, but still must address the questions in Section V(D).

For question (2)(b), program participants may include any additional relevant information related to their analysis of disparities in access to opportunity in the jurisdiction and region, including the removal of barriers that prevent people from accessing housing in areas of opportunity, the development of affordable housing in such areas, housing mobility programs, housing preservation and community revitalization efforts, where any such actions are designed to achieve fair housing outcomes such as increasing access to opportunity.

Disparities in Access to Opportunity: Contributing Factors

For question (3), consider the non-exhaustive list of factors provided, which are those most commonly associated with disparities in access to opportunity, and identify those factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity. For additional instructions on selecting contributing factors, refer to the introduction of these instructions.

Disproportionate Housing Needs

For question (1)(a), refer to Tables 9 and 10. Table 9 shows the percentage of race/ethnicity groups and families with children experiencing two potential categories of housing need. The first category is households experiencing one of four housing problems: housing cost burden (defined as paying more than 30% of income for monthly housing costs including utilities), overcrowding, lacking a complete kitchen, or lacking plumbing. The second category is households experiencing “one of four severe housing problems” which are: severe housing cost burden (defined as paying more than half of one’s income for monthly housing costs including utilities), overcrowding, and

lacking a complete kitchen, or lacking plumbing. Table 10 shows the number of persons by race/ethnicity and family size experiencing severe housing cost burden.

For question (1)(b), refer to Maps 7 and 8. Map 7 shows the residential living patterns for persons by race/ethnicity, overlaid by shading indicating the percentage of households experiencing one or more housing problems. Darker shading indicates a higher prevalence of such problems. The map also includes R/ECAP outlines. Map 8 shows the same information overlaid on residential living patterns by national origin.

For question (1)(c), refer to Tables 9 and 11. Table 9 shows housing needs experienced by families with 5 or more persons (used to approximate the population of families with children). Table 11 shows the number of households occupying units of various sizes (0-1 bedrooms, 2 bedrooms, 3 or more bedrooms) in four publicly supported housing program categories (public housing, Project-based Section 8, Other HUD Multifamily, and HCV). Table 11 shows the number of households with children currently residing in each of those four program categories.

For question (1)(d), local data and local knowledge may be particularly useful in answering this question.

Understanding the limitations of the HUD-provided data discussed in the introduction to the instruction, using local data and knowledge, complete question (2). The Fair Housing Act protects individuals on the basis of race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability. HUD has provided data for this section only on race/ethnicity, national origin, and familial status. Include any relevant information about other protected characteristics, but note that the analysis of disability is specifically considered in Section V(D). Program participants may include any relevant information relating to persons with disabilities here, but still must address the questions in Section V(D).

For question (2)(b), program participants may include any additional relevant information related to their analysis of disproportionate housing needs in the jurisdiction and region, including the removal of barriers that prevent people from accessing housing in areas of opportunity, the development of affordable housing in such areas, housing mobility programs, housing preservation and community revitalization efforts, where any such actions are designed to achieve fair housing outcomes such as reducing disproportionate housing needs.

For question (3), consider the non-exhaustive list of factors provided, which are those most commonly associated with disproportionate housing needs, and identify those factors that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs. For additional instructions on selecting contributing factors, refer to the introduction of these instructions.

Local data and local knowledge may be particularly useful in answering the Disproportionate Housing Needs questions. For instance, the HUD-provided tables do not include data on homeless persons. Information on homeless individuals and families, including some information on their demographic characteristics (e.g. race/ethnicity, persons with disabilities) is available from a variety of sources. HUD guidance can provide additional information on this topic.

C. Publicly Supported Housing² Analysis

Data on publicly supported housing is grouped into five program categories: public housing; project-based Section 8; Section 8 tenant-based Housing Choice Vouchers (HCV); Other HUD Multifamily housing (including Section 202 Supportive Housing for the Elderly and Section 811 Supportive Housing for Persons with Disabilities); and Low-Income Housing Tax Credit (LIHTC) housing. Relevant information may also include housing converted through the Rental Assistance Demonstration (RAD), which may be analyzed as part of Housing Choice Vouchers. HUD has included RAD as a separate category for two specific questions in this section for policy reasons. Some tables and maps provided include information on some of the program categories but not others based on availability of the data. Where a housing development includes more than one category of publicly supported housing, this development is reported in data for each housing category (e.g., project-based Section 8 combined with LIHTC). Note that other publicly supported housing programs, for instance those funded through state and local programs or by other federal agencies, such as USDA's Rural Housing Service and the Veteran's Administration, or other HUD programs that are not covered in the HUD-provided data may be relevant to the analysis.

Data related to public housing may be affected by asset management project (AMP) groupings.³ For instance, where public housing agencies report data for developments located at different sites as one AMP, the map showing the locations of the categories of publicly supported housing will only display this data at one location. Similarly, the table showing the census tract and occupancy of public housing will only show AMP groupings once, rather than for each site. In certain circumstances AMP groupings may affect the fair housing analysis. For example, AMP groupings will impede siting and occupancy analyses where AMP groupings have combined buildings that are in demographically different neighborhoods. For this reason, local data and local knowledge relating to the siting and occupancy of publicly supported housing may be particularly useful in answering the questions in this section.

Publicly Supported Housing Demographics

For questions (1)(a)(i) and (ii), refer to Tables 6 and 7. Tables 6 and 7 present data by race/ethnicity for persons occupying four categories of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily, and HCV) in the jurisdiction. The tables also provide race/ethnicity data for the total population in the jurisdiction and for persons meeting the income eligibility requirements for a relevant category of publicly supported housing. Relevant information may also include housing converted through RAD, which may be analyzed as part of Housing Choice Vouchers.

² The term "publicly supported housing" refers to housing assisted, subsidized, or financed with funding through Federal, State, or local agencies or programs as well as housing that is financed or administered by or through any such agencies or programs. HUD is currently providing data on five specific categories of housing: Public Housing; Project-Based Section 8; "Other HUD Multifamily Housing" (including Section 202 – Supportive Housing for the Elderly and Section 811 – Supportive Housing for Persons with Disabilities); Low Income Housing Tax Credit (LIHTC) housing; and Housing Choice Vouchers (HCV). Other publicly supported housing relevant to the analysis includes housing funded through state and local programs, other federal agencies, such as USDA and VA, or other HUD-funded housing not captured in the five categories listed above.

³ The Operating Fund Program final rule, published on September 19, 2005, required PHAs to convert to asset management. In practice, this allowed PHAs to group buildings under asset management. All of the AMP groupings are reported as one unit and tied together through the assignment of the same project number.

Publicly Supported Housing Location and Occupancy

For questions (1)(b)(i) and (ii) refer to Maps 5 and 6, which are race/ethnicity dot density maps with a publicly supported housing overlay, including outlines of R/ECAPS. In Map 5, symbols representing four categories of publicly supported housing indicate the location of a development of that category of housing. Note that some developments may represent multiple buildings or projects that are not necessarily located at the same address the symbol represents. In Map 6, the density of use of Section 8 vouchers is layered over a race/ethnicity dot density map. Darker shading represents a heavier concentration of vouchers. Map 5 does not distinguish between developments that serve families, elderly, or persons with disabilities; however, projects serving these populations are often affected differently by laws, policies and practices, resulting in significantly different siting patterns. Local knowledge may be particularly useful in answering this portion of the question.

For question (1)(b)(iii), use Table 7, which shows the percentage of occupants in four publicly supported housing program categories (public housing, project-based Section 8, Other HUD Multifamily, and HCV) in units located either within R/ECAPS or outside of R/ECAPS. The table also breaks out this information by race/ethnicity, elderly and disability status. To answer the question, compare the percentage of occupants sharing a protected characteristic living in units located in R/ECAPS to the percentage of occupants sharing the same protected characteristic living in units outside of R/ECAPS. Relevant information may also include housing converted through RAD, which may be analyzed as part of Housing Choice Vouchers.

For question (1)(b)(iv)(A), refer to both the HUD-provided data and local data and local knowledge. Table 8 shows the racial/ethnic composition and percentage of households with children occupying public housing. Local data and local knowledge may be informative for both properties converted under RAD and for LIHTC developments.

Compare the demographic occupancy data of developments to other developments of the same category. In analyzing Table 8, be aware that the demographic occupancy information is affected by the size of the development – smaller developments may appear to have greater variance, but note that in small developments, a difference of a few units may alter the overall percentage of the occupancy demographic composition.

For question (1)(b)(iv)(B), Table 8 is provided for program participants' use, however local data and local knowledge, including information obtained through the community participation process, may be particularly useful in answering this portion of the question.

For question (1)(b)(v), refer to Table 8 and Map 5 and the Map 5 Query Tool. Table 8 includes development-level demographic characteristics of residents of three program categories (public housing, project-based Section 8, and Other HUD Multifamily). Map 5 shows the location of individual developments for four program categories (public housing, project-based Section 8, Other HUD Multifamily, and LIHTC). Note that census tract boundaries may not align with “neighborhoods” or “areas” as commonly understood at the local level, and local knowledge may be useful to assist in the comparison.

The Map 5 Query Tool allows sorting and exporting of census tract and occupancy demographic data from Map 5 to generate a table for the categories of publicly supported housing (i.e., public housing, project-based Section 8, Other HUD Multifamily Assisted developments (e.g., Sections 202 and 811), and LIHTC, provided that it excludes occupancy demographic data for LIHTC developments, which should be analyzed using local data and local knowledge).

Compare the demographic occupancy data of developments to the areas in which they are located.

Publicly Supported Housing: Disparities in Access to Opportunity

For question (1)(c)(i), refer to the opportunity indicators analyzed in Section B, and Maps 5 and 6, which are race/ethnicity dot density maps showing the locations of publicly supported housing developments (Map 5) and rates of Section 8 voucher utilization (Map 6) with R/ECAP outlines. Compare the locations of publicly supported housing to Maps 9 through 15, which depict the opportunity indicators. Note that while the location of housing may be relevant to analysis, it is not the only factor in analyzing disparities in access to opportunity. “Access” in this context encompasses consideration of infrastructure or policies related to where a person lives that impact an individual’s ability to benefit from an opportunity, such as available transportation to a job, school enrollment policies, program eligibility criteria, or local labor laws. As noted above, Map 5 does not distinguish between developments that serve families, elderly, or persons with disabilities; however, projects serving these populations often reveal distinct patterns. Local knowledge may be particularly useful in answering this portion of the question.

Publicly Supported housing: Additional Information

For question 2(a), understanding the limitations of the HUD-provided data discussed in the introduction to the instructions, using local data and knowledge, complete question (2). The Fair Housing Act protects individuals on the basis of race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability. HUD has provided data for this section only on race/ethnicity, national origin, familial status, and limited data on disability. Include any relevant information about other protected characteristics – but note that the analysis of disability is also specifically considered in Section V(D). Program participants may include an analysis of disability here, but still must include such analysis in Section V(D).

For question (2)(b), program participants may include any additional relevant information related to their analysis of publicly supported housing in the jurisdiction and region, including the removal of barriers that prevent people from accessing housing in areas of opportunity, the development of affordable housing in such areas, housing mobility programs, housing preservation and community revitalization efforts, where any such actions are designed to achieve fair housing outcomes such as reducing disproportionate housing needs, transforming R/ECAPs by addressing the combined effects of segregation coupled with poverty, increasing integration, and increasing access to opportunity, such as high-performing schools, transportation, and jobs.

For question (3), consider the non-exhaustive list of factors provided, which are those most commonly associated with publicly supported housing, and identify those factors that significantly create, contribute to, perpetuate, or increase the severity of the fair housing issues of segregation, R/ECAPs, access to opportunity and disproportionate housing needs in relation to publicly supported housing. For additional instructions on selecting contributing factors, refer to the introduction of these instructions.

D. Disability and Access Analysis

There are limited sources of nationally uniform data on the extent to which individuals with disabilities are able to access housing and other community assets. Local data and local knowledge may be particularly useful in completing this section, including, but not limited to, information provided by the public, outside organizations and other government agencies in the community participation process.

For question (1)(a), refer to Map 16 and Table 13. Map 16 depicts a dot density distribution by disability type (hearing, vision, cognition, ambulatory, self-care, independent living) for the jurisdiction and the region. The map also includes R/ECAP outlines. Table 13 provides data on the percentage of the population with types of disabilities in the jurisdiction and the region.

For question (1)(b), refer to Maps 16 and 17 and Table 15. Map 17 depicts a dot density distribution of persons with disabilities by age (5-17, 18-64, and 65+) for the jurisdiction and the region. Table 14 provides data on the percentage of the population with disabilities by age for the jurisdiction and the region.

For questions (2)(a) HUD is unable to provide data at this time, as there is limited nationally available disability-related data at this time, including data relating to accessible housing; however, to assist with answering these questions, program participants may refer to the maps provided by HUD to identify R/ECAPs or other segregated areas identified in previous sections.

For questions (2)(b) HUD is unable to provide data at this time. Single-family housing is generally not accessible to persons with disabilities unless state or local law requires it to be accessible or the housing is part of a HUD-funded program or other program providing for accessibility features. The Fair Housing Act requires that most multifamily properties built after 1991 meet federal accessibility standards. As a result, multifamily housing built after this date, if built in compliance with federal law would meet this minimum level of accessibility, while buildings built before this date generally would not be accessible. The age of housing stock can be a useful measure in answering this question. In addition, affordable housing subject to Section 504 of the Rehabilitation Act must include a percentage of units accessible for individuals with mobility impairments and units accessible for individuals with hearing or vision impairments. Map 5, which shows the location of four types of publicly supported housing, may also be useful in answering this question.

For question (2)(c), refer to Table 15. Table 15 provides data on the number and percentage of persons with disabilities residing in four categories of publicly supported housing in both the jurisdiction and the region. In answering the question, consider policies and practices that impact individuals' ability to access the housing, including such things as wait list procedures, admissions or occupancy policies (e.g., income targeting for new admissions), residency preferences, availability of different accessibility features, and website accessibility.

The Fair Housing Act, Section 504, and the ADA contain mandates related to integrated settings for persons with disabilities. Integrated settings are those that enable individuals with disabilities to live and interact with individuals without disabilities to the greatest extent possible and receive the healthcare and supportive services from the provider of their choice. To answer questions (3)(a) and (b), refer to HUD's "Statement of the Department of Housing and Urban Development on the Role of Housing in Accomplishing the Goals of *Olmstead*."⁴

Local data and local knowledge will likely be particularly useful in answering questions. Sources of location data and local knowledge may include, among others, data Centers for Medicare & Medicaid Services' data from the Money Follows the Person demonstration or on persons with disabilities living in nursing facilities and intermediate care facilities, HUD data on persons with disabilities experiencing homelessness, information provided by individuals with disabilities, federally-funded independent living centers, state protection and advocacy organizations, advocacy

⁴ HUD's *Olmstead* Statement can be found at:
<http://portal.hud.gov/hudportal/documents/huddoc?id=OlmsteadGuidnc060413.pdf>.

organizations representing the spectrum of disabilities, state developmental disability councils and agencies, and state mental health/behavioral health agencies. Topics for consideration may include the length of wait lists for accessible units in publicly supported housing, availability of accessible units in non-publicly supported housing available to HCV participants, whether public funding (e.g. CDBG funds) or tax credits are available for reasonable modifications in rental units and/or for homeowners, whether accessible units are occupied by households requiring accessibility features, and whether publicly supported housing is in compliance with accessibility requirements.

To ensure meaningful analysis of these questions, program participants may need to obtain information from state disability service authorities, which may include, for example, the developmental disabilities authority, mental health authority, social or human services department, and the state Medicaid agency, each of which is likely to have ready access to reliable information concerning the location and frequency of individuals with disabilities. A state's Olmstead Plan may contain useful information in answering these questions.

For questions (4)(a)-(c), HUD is unable to provide data, as there is limited nationally available disability-related data. Local data and local knowledge will likely be particularly useful in answering questions.

For question (5)(a), program participants may refer to Tables 9, 10, and 11 and Maps 7 and 8 for data relating to disproportionate housing needs. However, this data is not specific to individuals with disabilities, as such local data and local knowledge may be particularly useful in answering this question.

Understanding the limitations of the HUD-provided data discussed above, complete question (6)(a). The Fair Housing Act protects individuals on the basis of race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability. HUD has provided data for this section only on certain types of disabilities and for the ages of persons with disabilities. Include any relevant information about other protected characteristics.

For question (6)(b), program participants may include any additional relevant information related to their analysis of disability and access in the jurisdiction and region, including the removal of barriers that prevent people from accessing housing in areas of opportunity, the development of affordable housing in such areas, housing mobility programs, housing preservation, and community revitalization efforts, where any such actions are designed to achieve fair housing outcomes such as reducing disproportionate housing needs, transforming R/ECAPs by addressing the combined effects of segregation coupled with poverty, increasing integration, and increasing access to opportunity, such as high-performing schools, transportation, and jobs.

For question (7), consider the list of factors provided, which are those most commonly associated with disability and access, and identify those factors that significantly create, contribute to, perpetuate, or increase the severity of the fair housing issues of segregation, R/ECAPs, access to opportunity and disproportionate housing needs in relation to disability and access. For additional instructions on selecting contributing factors, refer to the introduction of these instructions.

E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

Complete question (1). A summary of cases would typically include the parties, claims, and current status.

Complete question (2). Note that in the context of state and local fair housing and civil rights laws and ordinances, program participants may also discuss additional protected classes covered under those laws and ordinances.

For question (3), list the agencies and organizations that provide fair housing information in the jurisdiction and region. Include a description of their capacity and resources available to them.

For questions (4)(a) and (b), program participants may include any additional relevant information related to their analysis of fair housing enforcement, outreach capacity, and resources in the jurisdiction and region, including the removal of barriers that prevent people from accessing housing in areas of opportunity, where any such actions are designed to achieve fair housing outcomes such as reducing disproportionate housing needs, transforming R/ECAPs by addressing the combined effects of segregation coupled with poverty, increasing integration, and increasing access to opportunity, such as high-performing schools, transportation, and jobs.

For question (5), consider the list of factors provided, which are those most commonly associated with fair housing enforcement, outreach capacity, and resources, and identify those factors that significantly create, contribute to, perpetuate, or increase the severity of the fair housing issues of segregation, R/ECAPs, access to opportunity and disproportionate housing needs in relation to fair housing enforcement, outreach capacity, and resources. For additional instructions on selecting contributing factors, refer to the introduction of these instructions.

F. Instructions for Small Program Participant Insert A

As the rule makes clear, when collaborating to submit a joint or regional AFH, program participants may divide work as they choose. However, this assessment tool provides a potential division of work local governments partnering with one or more QPHAs. Program participants that collaborate with a QPHA may use either the QPHA insert or the main portion of the assessment tool to analyze the QPHA's jurisdiction. The QPHA insert is intended to reduce burden for QPHAs by providing a streamlined set of questions for their service area. A QPHA insert needs to be completed for each collaborating QPHA. Additionally, the regional portion of the QPHA analysis is expected to be fulfilled by the local government's analysis of the entire CBSA, provided the QPHA's service area falls within the scope of analysis conducted in the main portion of this assessment tool. For purposes of this assessment tool, the QPHA region is defined as the CBSA if the QPHA service area is within the CBSA.

HUD is aware of some limitations of the HUD-provided data, especially for rural areas, and for small geographies such as those where many QPHAs are often located. As such, local data and local knowledge, including information gathered from community participation, including from the Resident Advisory Board, may be particularly useful in addressing the questions below.

The QPHA analysis is offered only for the purposes of submitting the service area/jurisdictional analysis of a QPHA collaborating with a local government. If the QPHA analysis does not meet the standards for an acceptable AFH, then HUD may decide not to accept the AFH with respect to the QPHA and accept the local government assessment. By collaborating with a QPHA, the local government is not making itself responsible for carrying out the QPHA portion of the assessment nor accountable for AFH goals that are specifically designated as QPHA goals, unless the local government and QPHA have joint goals.

If the local government and QPHA believe the QPHA insert provided in this assessment tool is not beneficial for the purposes of conducting the required analysis for the QPHA, they may exclude

this set of questions from their analysis, provided the main assessment tool questions are completed for the QPHA. All program participants are accountable for the analysis conducted at the jurisdictional and regional levels as well as any joint goals and priorities. Program participants are also accountable for their individual analysis, goals, and priorities. (See § 5.156(a)(3).) For example, in a joint collaboration involving a local government and two QPHAs, the local government may conduct certain parts of the joint analysis and the QPHAs may conduct other parts, provided all necessary parts are completed. HUD believes it is best left to the program participants in a joint or regional collaboration to decide how their individual expertise may best contribute to a joint or regional AFH, provided it is consistent with the AFFH rule.

Segregation/Integration

For question 1, refer to Maps 1, 2, 3 and 4. Local data and local knowledge, including information obtained through the community participation process, will be particularly useful in answering the question. Program participants may refer to the instructions for the Segregation section of the main assessment tool for additional information related to the maps and tables.

R/ECAPs

For question 2, refer to Maps 1 and 2, and Table 4. Local data and local knowledge, including information obtained through the community participation process, will be particularly useful in answering the question. Program participants may refer to the instructions for the R/ECAPs section of the main assessment tool for additional information related to the maps and tables.

Disparities in Access to Opportunity

For question 3, refer to Maps 9-15. Local data and local knowledge, including information obtained through the community participation process, will be particularly useful in answering the question. Program participants may refer to the instructions for the Disparities in Access to Opportunity section of the main assessment tool for additional information related to the maps and tables.

Disproportionate Housing Needs

For question 4, refer to Tables 9 and 10. Local data and local knowledge, including information obtained through the community participation process, will be particularly useful in answering the question. Program participants may refer to the instructions for the Disproportionate Housing Needs section of the main assessment tool for additional information related to the maps and tables.

Publicly Supported Housing

For question 5.a., refer to [HUD-provided table/map]. Local data and local knowledge, including information obtained through the community participation process, will be particularly useful in answering the question. Program participants may refer to the instructions for the Demographics subsection of the Publicly Supported Housing section of the main assessment tool for additional information related to the maps and tables.

For question 5.b.i., refer to Maps 5 and 6. Local data and local knowledge, including information obtained through the community participation process, will be particularly useful in answering the question. Program participants may refer to the instructions for the Segregation and R/ECAPs

subsection of the Publicly Supported Housing section of the main assessment tool for additional information related to the maps and tables.

For question 5.b.ii., refer to Table 7. Local data and local knowledge, including information obtained through the community participation process, will be particularly useful in answering the question. Program participants may refer to the instructions for the Segregation and R/ECAPs subsection of the Publicly Supported Housing section of the main assessment tool for additional information related to the maps and tables.

For question 5.b.iii., refer to Table 8 and the Map 5 Query Tool. Local data and local knowledge, including information obtained through the community participation process, will be particularly useful in answering the question. Program participants may refer to the instructions for the Segregation and R/ECAPs subsection of the Publicly Supported Housing section of the main assessment tool for additional information related to the maps and tables.

For question 5.c., refer to Maps 9-15. Local data and local knowledge, including information obtained through the community participation process, will be particularly useful in answering the question. Program participants may refer to the instructions for the Disparities in Access to Opportunity subsection of the Publicly Supported Housing section of the main assessment tool for additional information related to the maps and tables.

For question 5.d.i., refer to [HUD-provided table with PHA demographics] and Tables 9 and 10 with information on Disproportionate Housing Needs. For question 6.d.ii., refer to Table 11. Local data and local knowledge, including information obtained through the community participation process, will be particularly useful in answering the question. Program participants may refer to the instructions for the Disproportionate Housing Needs subsection of the Publicly Supported Housing section of the main assessment tool for additional information related to the maps and tables.

For question 5.e., local data and local knowledge, including information obtained through the community participation process, will be particularly useful.

For question 5.f., local data and local knowledge, including information obtained through the community participation process, will be particularly useful.

Disability and Access

For questions 6.a., refer to Maps 16-17. For questions 6.a-c., local data and local knowledge, including information obtained through the community participation process, will be particularly useful in answering the question. Program participants may refer to the instructions for the Disability and Access section of the main assessment tool for additional information related to the maps and tables.

Fair Housing Enforcement

For question 7, local data and local knowledge, including information obtained through the community participation process, will be particularly useful in answering the question. Program participants may refer to the instructions for the Fair Housing Enforcement section of the main assessment tool for additional information related to the maps and tables.

Additional QPHA Information

For question 8, local data and local knowledge, including information obtained through the community participation process, will be particularly useful in answering the question.

G. Instructions for Small Program Participant Insert B

As the rule makes clear, when collaborating to submit a joint or regional AFH, program participants may divide work as they choose. However, this assessment tool provides a potential division of work for either: (1) A local government that received a CDBG grant of \$500,000 or less in the most recent fiscal year prior to the due date for the joint or regional AFH collaborates with a local government that received a CDBG grant larger than \$500,000 in the most recent fiscal year prior to the due date for the joint or region AFH; or (2) A HOME consortia whose members collectively received less than \$500,000 in CDBG funds or received no CDBG funding partners with a with a local government that received a CDBG grant larger than \$500,000 in the most recent fiscal year prior to the due date for the joint or region AFH.

Program participants that collaborate with such local governments may use either this insert or the main portion of the assessment tool to analyze the local government's jurisdiction. This insert is also intended to reduce burden for small program participants by providing a streamlined set of questions for their jurisdiction. If the collaboration elects to this division of work, this insert needs to be completed for each collaborating small program participant. Additionally, the regional portion of the small program participant's analysis is expected to be fulfilled by the lead entity's analysis of the entire CBSA, provided the local government's region falls within the scope of analysis conducted in the main portion of this assessment tool. For purposes of this assessment tool, the small program participant's region is defined as the CBSA, if the local government is within the CBSA.

HUD is aware of the data limitations of the HUD-provided data, especially for rural areas, and for small geographies such as those where many small program participants are often located. As such, local data and local knowledge, including information gathered from community participation, will be particularly useful in answering questions.

This analysis is offered only for the purposes of submitting the jurisdictional analysis of a small program participant collaborating with a local government that receives more than \$500,000 in CDBG funding. If the small program participant's analysis does not meet the standards for an acceptable AFH, then HUD may decide not to accept the AFH with respect to the small program participant and accept as to the local government serving as the lead entity's assessment. By collaborating with a small program participant, the local government serving as the lead entity is not making itself responsible for carrying out the small program participant's portion of the assessment nor accountable for AFH goals that are specifically designated as small program participant goals, unless the local government serving as the lead entity and small program participant have joint goals.

If the local government serving as the lead entity and the small program participant believe the small program participant insert provided in this assessment tool is not beneficial for the purposes of conducting the required analysis, they may exclude this set of questions from their analysis and complete the questions in the main assessment tool instead for all program participant jurisdictions and regions. All program participants are accountable for the analysis conducted at the jurisdictional and regional level as well as any joint goals and priorities. Program participants are also accountable for their individual analysis, goals, and priorities. (See § 5.156(a)(3).) For example, in a regional collaboration involving two local governments and a small program participant, the local government may conduct certain parts of the joint analysis and the small

program participants may conduct other parts, provided all necessary parts are completed. HUD believes it is best left to the program participants in a joint or regional collaboration to decide how their individual expertise may best contribute to a joint or regional AFH, provided it is consistent with the AFFH rule.

Demographics

For question 1, refer to Tables 1 and 2. Local data and local knowledge, including information obtained through the community participation process, will be particularly useful in answering the question. Program participants may refer to the instructions for the Demographics section of the main assessment tool for additional information related to the maps and tables.

Segregation/Integration

For question 2, refer to Maps 1, 2, 3 and 4. Local data and local knowledge, including information obtained through the community participation process, will be particularly useful in answering the question. Program participants may refer to the instructions for the Segregation section of the main assessment tool for additional information related to the maps and tables.

R/ECAPs

For question 3, refer to Maps 1 and 2, and Table 4. Local data and local knowledge, including information obtained through the community participation process, will be particularly useful in answering the question. Program participants may refer to the instructions for the R/ECAPs section of the main assessment tool for additional information related to the maps and tables.

Disparities in Access to Opportunity

For question 4, refer to Table 12 and Maps 9-15. Local data and local knowledge, including information obtained through the community participation process, will be particularly useful in answering the question. Program participants may refer to the instructions for the Disparities in Access to Opportunity section of the main assessment tool for additional information related to the maps and tables.

Disproportionate Housing Needs

For question 5, refer to Tables 9 and 10. Local data and local knowledge, including information obtained through the community participation process, will be particularly useful in answering the question. Program participants may refer to the instructions for the Disproportionate Housing Needs section of the main assessment tool for additional information related to the maps and tables.

Publicly Supported Housing

For question 6.a., refer to Table 6. Local data and local knowledge, including information obtained through the community participation process, will be particularly useful in answering the question. Program participants may refer to the instructions for the Demographics subsection of the Publicly Supported Housing section of the main assessment tool for additional information related to the maps and tables.

For question 6.b.i., refer to Maps 5 and 6. Local data and local knowledge, including information obtained through the community participation process, will be particularly useful in answering the

question. Program participants may refer to the instructions for the Segregation and R/ECAPs subsection of the Publicly Supported Housing section of the main assessment tool for additional information related to the maps and tables.

For question 6.b.ii., refer to Table 7. Local data and local knowledge, including information obtained through the community participation process, will be particularly useful in answering the question. Program participants may refer to the instructions for the Segregation and R/ECAPs subsection of the Publicly Supported Housing section of the main assessment tool for additional information related to the maps and tables.

For question 6.b.iii., refer to Table 8 and the Map 5 Query Tool. Local data and local knowledge, including information obtained through the community participation process, will be particularly useful in answering the question. Program participants may refer to the instructions for the Segregation and R/ECAPs subsection of the Publicly Supported Housing section of the main assessment tool for additional information related to the maps and tables.

For question 6.c., refer to Maps 9-15. Local data and local knowledge, including information obtained through the community participation process, will be particularly useful in answering the question. Program participants may refer to the instructions for the Disparities in Access to Opportunity subsection of the Publicly Supported Housing section of the main assessment tool for additional information related to the maps and tables.

For question 6.d.i., refer to Tables 9 and 10. For question 6.d.ii., refer to Table 11. Local data and local knowledge, including information obtained through the community participation process, will be particularly useful in answering the question. Program participants may refer to the instructions for the Disproportionate Housing Needs subsection of the Publicly Supported Housing section of the main assessment tool for additional information related to the maps and tables.

For question 6.e., refer to Map 5 and Table 6. Local data and local knowledge, including information obtained through the community participation process, will be particularly useful.

Disability and Access

For questions 7.a., refer to Maps 15-17. For questions a-c., Local data and local knowledge, including information obtained through the community participation process, will be particularly useful in answering the question. Program participants may refer to the instructions for the Disability and Access section of the main assessment tool for additional information related to the maps and tables.

Fair Housing Enforcement

For question 8, local data and local knowledge, including information obtained through the community participation process, will be particularly useful in answering the question. Program participants may refer to the instructions for the Fair Housing Enforcement section of the main assessment tool for additional information related to the maps and tables.

Additional QPHA Information

For question 9, local data and local knowledge, including information obtained through the community participation process, will be particularly useful in answering the question.

Part VI: Fair Housing Goals and Priorities

To answer question (1), use the contributing factors selected in prior sections and prioritize them. In prioritizing contributing factors, program participants shall give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance. Provide a justification for the prioritization of the factors. Also describe the prioritization method used. For example, if using a 1 through 5 ranking system, identify whether 1 or 5 reflects the highest priority.

Note that contributing factors may be outside the ability of program participants to directly control or influence. In such cases, those factors must be included in the prioritization. There still may be policy options or goals that program participants should identify, while recognizing the limitations involved.

For question (2), set one or more goals to address each fair housing issue with significant contributing factors. For each goal, program participants must identify one or more contributing factors that the goal is designed to address, describe how the goal relates to overcoming the identified contributing factor(s) and related fair housing issue, and identify metrics and milestones for determining what fair housing results will be achieved. For instance, where segregation in a development or geographic area is determined to be a fair housing issue, with at least one significant contributing factor, HUD would expect the AFH to include one or more goals to reduce the segregation.

In answering question (2), use the table provided. Provide at least one goal addressing each fair housing issue. In the “Goals” column, state the goal that is being set. In the “Contributing Factors” column, identify the contributing factors the goal is designed to overcome. In the “Fair Housing Issues” column, identify the related fair housing issues the goal is designed to address. In the “Metrics and Milestones” column, identify the metrics and milestones program participants will use for determining what fair housing results will be achieved and a timeframe for achievement. Finally, in the “Discussion” row, provide an explanation of how the goal being set is going to address the contributing factors and related fair housing issues. For program participants submitting jointly, denote which program participant is responsible for each particular goal. If program participants are setting joint goals, explain the responsibilities of each program participant with respect to the joint goal. Please note that the number of goals is not limited by the table provided. Program participants are encouraged to set more goals than the table allows for currently.⁵

While the statutory duty to affirmatively further fair housing requires program participants to affirmatively further fair housing, the final rule does not mandate specific outcomes for the planning process. Instead, recognizing the importance of local decision-making, the analysis conducted in the AFH is meant to help guide public sector housing and community development planning and investment decisions in being better informed about fair housing concerns and consequently help program participants to be better positioned to fulfill their obligation to affirmatively further fair housing.

Program participants should note that the strategies and actions, and the specifics of funding decisions, subject to the consolidated plan, PHA plan, or other applicable planning process are not required to be in the AFH. However, the goals set by program participants will factor into these

⁵ HUD anticipates that the online user interface that is currently under development will allow for program participants to set as many goals as a program participant wishes.

planning processes. These goals will form the basis for strategies and actions in the subsequent planning documents. As stated in the regulatory text at 24 C.F.R. § 5.150, “a program participant’s strategies and actions must affirmatively further fair housing and may include various activities, such as developing affordable housing, and removing barriers to the development of such housing, in areas of high opportunity; strategically enhancing access to opportunity, including through targeted investment in neighborhood revitalization or stabilization; through preservation or rehabilitation of existing affordable housing; promoting greater housing choice within or outside areas of concentrated poverty and access to areas of high opportunity; and improving community assets such as quality schools, employment, and transportation.” Goals addressing fair housing choice may include, for example, enhanced mobility options that afford access to areas of high opportunity.

Certification and Submission

Please note, for a joint or regional AFH, each collaborating program participant must authorize a representative to sign the certification on the program participant's behalf. In a joint or regional AFH, when responding to each question, collaborating program participants may provide joint analyses and individual analyses. The authorized representative of each program participant certifies only to information the program participant provides individually or jointly in response to each question in the assessment. The authorized representative does not certify for information applicable only to other collaborating program participants' analyses, if any.

APPENDIX A – HUD-Provided Maps

Map 1 Race/Ethnicity – Current (2010) race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Map 2 Race/Ethnicity Trends – Past (1990 and 2000) race/ethnicity dot density maps for Jurisdiction and Region with R/ECAPs

Map 3 National Origin – Current 5 most populous national origin groups dot density map for Jurisdiction and Region with R/ECAPs

Map 4 LEP – LEP persons by 5 most populous languages dot density map for Jurisdiction and Region with R/ECAPs

Map 5 Publicly Supported Housing and Race/Ethnicity – Public Housing, Project-Based Section 8, Other Multifamily, and LIHTC locations mapped with race/ethnicity dot density map with R/ECAPs, distinguishing categories of publicly supported housing by color, for the Jurisdiction and Region

Map 6 Housing Choice Vouchers and Race/Ethnicity – Housing Choice Vouchers with race/ethnicity dot density map and R/ECAPs, for the Jurisdiction and Region

Map 7 Housing Burden and Race/Ethnicity – Households experiencing one or more housing burdens in Jurisdiction and Region with race/ethnicity dot density map and R/ECAPs

Map 8 Housing Burden and National Origin – Households experiencing one or more housing burdens in Jurisdiction and Region with national origin dot density map and R/ECAPs

Map 9 Demographics and School Proficiency – School proficiency thematic map for Jurisdiction and Region with race/ethnicity, national origin, and familial status maps and R/ECAPs

Map 10 Demographics and Job Proximity – Job proximity thematic map for Jurisdiction and Region with race/ethnicity, national origin, and familial status maps and R/ECAPs

Map 11 Demographics and Labor Market Engagement – Labor engagement thematic map for Jurisdiction and Region with race/ethnicity, national origin, and familial status maps and R/ECAPs

Map 12 Demographics and Transit Trips – Transit proximity thematic map for Jurisdiction and Region with race/ethnicity, national origin, and familial status maps and R/ECAPs

Map 13 Demographics and Low Transportation Costs – Low transportation cost thematic map for Jurisdiction and Region with race/ethnicity, national origin, and familial status maps and R/ECAPs

Map 14 Demographics and Poverty – Low poverty thematic map for Jurisdiction and Region with race/ethnicity, national origin, and familial status maps and R/ECAPs

Map 15 Demographics and Environmental Health – Environmental health thematic map for Jurisdiction and Region with race/ethnicity, national origin, and familial status maps with R/ECAPs

Map 16 Disability by Type – Population of persons with disabilities dot density map by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

Map 17 Disability by Age Group – All persons with disabilities by age range (5-17; 18-64; and 65+) dot density map with R/ECAPs for Jurisdiction and Region

APPENDIX B – HUD-Provided Tables

Table 1 Demographics – Tabular demographic data for Jurisdiction and Region (including total population, the number and percentage of persons by race/ethnicity, national origin (10 most populous), LEP (10 most populous), disability (by disability type), sex, age range (under 18, 18-64, 65+), and households with children)

Table 2 Demographic Trends – Tabular demographic trend data for Jurisdiction and Region (including the number and percentage of persons by race/ethnicity, total national origin (foreign born), total LEP, sex, age range (under 18, 18-64, 65+), and households with children)

Table 3 Racial/Ethnic Dissimilarity – Tabular race/ethnicity dissimilarity index for Jurisdiction and Region

Table 4 R/ECAP Demographics – Tabular data for the percentage of racial/ethnic groups, families with children, and national origin groups (10 most populous) for the Jurisdiction and Region who reside in R/ECAPs

Table 5 Publicly Supported Housing Units by Program Category – Tabular data for total units by 4 categories of publicly supported housing in the Jurisdiction (Public Housing, Project-Based Section 8, Other Multifamily, Housing Choice Voucher (HCV) Program) for the Jurisdiction

Table 6 Publicly Supported Housing Residents by Race/Ethnicity – Tabular race/ethnicity data for 4 categories of publicly supported housing (Public Housing, Project-Based Section 8, Other Multifamily, HCV) in the Jurisdiction compared to the population as a whole, and to persons earning 30% AMI, in the Jurisdiction

Table 7 R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category – Tabular data on publicly supported housing units and R/ECAPs for the Jurisdiction

Table 8 Demographics of Publicly Supported Housing Developments by Program Category – Development level demographics by Public Housing, Project-Based Section 8, and Other Multifamily⁶ for the Jurisdiction

Table 9 Demographics of Households with Disproportionate Housing Needs – Tabular data of total households in the Jurisdiction and Region and the total number and percentage of households experiencing one or more housing burdens by race/ethnicity and family size in the Jurisdiction and Region

⁶ Please note that, for the first year, census tract level demographic data in which publicly supported housing developments are located, also including LIHTC developments, are available through the AFFH Data and Mapping Tool which includes a data query function and ability to export tables.

Table 10 Demographics of Households with Severe Housing Cost Burden – Tabular data of the total number of households in the Jurisdiction and Region and the number and percentage of households experiencing severe housing burdens by race/ethnicity for the Jurisdiction and Region

Table 11 Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children – Tabular data on the number of bedrooms for units of 4 categories of publicly supported housing (Public Housing, Project-Based Section 8, Other Multifamily, HCV) for the Jurisdiction

Table 12 Opportunity Indicators by Race/Ethnicity – Tabular data of opportunity indices for school proficiency, jobs proximity, labor-market engagement, transit trips, low transportation costs, low poverty, and environmental health for the Jurisdiction and Region by race/ethnicity and among households below the Federal poverty line.

Table 13 Disability by Type – Tabular data of persons with vision, hearing, cognitive, ambulatory, self-care, and independent living disabilities for the Jurisdiction and Region

Table 14 Disability by Age Group – Tabular data of persons with disabilities by age range (5-17, 18-64, and 65+) for the Jurisdiction and Region

Table 15 Disability by Publicly Supported Housing Program Category – Tabular data on disability and publicly supported housing for the Jurisdiction and Region

APPENDIX C – Contributing Factors Descriptions

Access to financial services

The term “financial services” refers here to economic services provided by a range of quality organizations that manage money, including credit unions, banks, credit card companies, and insurance companies. These services would also include access to credit financing for mortgages, home equity, and home repair loans. Access to these services includes physical access - often dictated by the location of banks or other physical infrastructure - as well as the ability to obtain credit, insurance or other key financial services. Access may also include equitable treatment in receiving financial services, including equal provision of information and equal access to mortgage modifications. For purposes of this contributing factor, financial services do not include predatory lending including predatory foreclosure practices, storefront check cashing, payday loan services, and similar services. Gaps in banking services can make residents vulnerable to these types of predatory lending practices, and lack of access to quality banking and financial services may jeopardize an individual’s credit and the overall sustainability of homeownership and wealth accumulation.

Access to proficient schools that are accessible for persons with disabilities

Individuals with disabilities may face unique barriers to accessing proficient schools. In some jurisdictions, some school facilities may not be accessible or may only be partially accessible to individuals with different types of disabilities (often these are schools built before the enactment of the ADA or the Rehabilitation Act of 1973). In general, a fully accessible building is a building that complies with all of the ADA's requirements and has no barriers to entry for persons with mobility impairments. It enables students and parents with physical or sensory disabilities to access and use all areas of the building and facilities to the same extent as students and parents without disabilities, enabling students with disabilities to attend classes and interact with students without disabilities to the fullest extent. In contrast, a partially accessible building allows for persons with mobility impairments to enter and exit the building, access all relevant programs, and have use of at least one restroom, but the entire building is not accessible and students or parents with disabilities may not access areas of the facility to the same extent as students and parents without disabilities. In addition, in some instances school policies steer individuals with certain types of disabilities to certain facilities or certain programs or certain programs do not accommodate the disability-related needs of certain students.

Access to publicly supported housing for persons with disabilities

The lack of a sufficient number of accessible units or lack of access to key programs and services poses barriers to individuals with disabilities seeking to live in publicly supported housing. For purposes of this assessment, publicly supported housing refers to housing units that are subsidized by federal, state, or local entities. “Accessible housing” refers to housing that accords individuals with disabilities equal opportunity to use and enjoy a dwelling. The concept of “access” here includes physical access for individuals with different types of disabilities (for example, ramps and other accessibility features for individuals with mobility impairments, visual alarms and signals for individuals who are deaf or hard of hearing, and audio signals, accessible signage, and other accessibility features for individuals who are blind or have low vision), as well as the provision of auxiliary aids and services to provide effective communication for individuals who are deaf or hard of hearing, are blind or have low vision, or individuals who have speech impairments. The concept of “access” here also includes programmatic access, which implicates such policies as application procedures, waitlist procedures, transfer procedures and reasonable accommodation procedures.

Access to transportation for persons with disabilities

Individuals with disabilities may face unique barriers to accessing transportation, including both public and private transportation, such as buses, rail services, taxis, and para-transit. The term “access” in this context includes physical accessibility, policies, physical proximity, cost, safety, reliability, etc. It includes the lack of accessible bus stops, the failure to make audio announcements for persons who are blind or have low vision, and the denial of access to persons with service animals. The absence of or clustering of accessible transportation and other transportation barriers may limit the housing choice of individuals with disabilities.

Admissions and occupancy policies and procedures, including preferences in publicly supported housing

The term “admissions and occupancy policies and procedures” refers here to the policies and procedures used by publicly supported housing providers that affect who lives in the housing, including policies and procedures related to marketing, advertising vacancies, applications, tenant selection, assignment, and maintained or terminated occupancy. Procedures that may relate to fair housing include, but are not limited to:

- Admissions preferences (e.g. residency preference, preferences for local workforce, etc.)
- Application, admissions, and waitlist policies (e.g. in-person application requirements, rules regarding applicant acceptance or rejection of units, waitlist time limitations, first come first serve, waitlist maintenance, etc.).
- Income thresholds for new admissions or for continued eligibility.
- Designations of housing developments (or portions of developments) for the elderly and/or persons with disabilities.
- Occupancy limits.
- Housing providers’ policies for processing reasonable accommodations and modifications requests.
- Credit or criminal record policies.
- Eviction policies and procedures.

The availability of affordable units in a range of sizes

The provision of affordable housing is often important to individuals with certain protected characteristics because groups are disproportionately represented among those who would benefit from low-cost housing. What is “affordable” varies by circumstance, but an often used rule of thumb is that a low- or moderate-income family can afford to rent or buy a decent-quality dwelling without spending more than 30 percent of its income. This contributing factor refers to the availability of units that a low- or moderate-income family could rent or buy, including one-bedroom units and multi-bedroom units for larger families. When considering availability, consider transportation costs, school quality, and other important factors in housing choice. Whether affordable units are available with a greater number of bedrooms and in a range of different geographic locations may be a particular barrier facing families with children.

The availability, type, frequency, and reliability of public transportation

Public transportation is shared passenger transport service available for use by the general public, including buses, light rail, and rapid transit. Public transportation includes paratransit services for persons with disabilities. The availability, type, frequency, and reliability of public transportation affect which households are connected to community assets and economic opportunities. Transportation policies that are premised upon the use of a personal vehicle may impact public transportation. “Availability” as used here includes geographic proximity, cost, safety and accessibility, as well as whether the transportation connects individuals to places they need to go

such as jobs, schools, retail establishments, and healthcare. “Type” refers to method of transportation such as bus or rail. “Frequency” refers to the interval at which the transportation runs. “Reliability” includes such factors as an assessment of how often trips are late or delayed, the frequency of outages, and whether the transportation functions in inclement weather.

Community opposition

The opposition of community members to proposed or existing developments—including housing developments, affordable housing, publicly supported housing (including use of housing choice vouchers), multifamily housing, or housing for persons with disabilities—is often referred to as “Not in my Backyard,” or NIMBY-ism. This opposition is often expressed in protests, challenges to land-use requests or zoning waivers or variances, lobbying of decision-making bodies, or even harassment and intimidation. Community opposition can be based on factual concerns (concerns are concrete and not speculative, based on rational, demonstrable evidence, focused on measurable impact on a neighborhood) or can be based on biases (concerns are focused on stereotypes, prejudice, and anxiety about the new residents or the units in which they will live). Community opposition, when successful at blocking housing options, may limit or deny housing choice for individuals with certain protected characteristics.

Deteriorated and abandoned properties

The term “deteriorated and abandoned properties” refers here to residential and commercial properties unoccupied by an owner or a tenant, which are in disrepair, unsafe, or in arrears on real property taxes. Deteriorated and abandoned properties may be signs of a community’s distress and disinvestment and are often associated with crime, increased risk to health and welfare, plunging decreasing property values, and municipal costs. The presence of multiple unused or abandoned properties in a particular neighborhood may have resulted from mortgage or property tax foreclosures. The presence of such properties can raise serious health and safety concerns and may also affect the ability of homeowners with protected characteristics to access opportunity through the accumulation of home equity. Demolition without strategic revitalization and investment can result in further deterioration of already damaged neighborhoods.

Displacement of residents due to economic pressures

The term “displacement” refers here to a resident’s undesired departure from a place where an individual has been living. “Economic pressures” may include, but are not limited to, rising rents, rising property taxes related to home prices, rehabilitation of existing structures, demolition of subsidized housing, loss of affordability restrictions, and public and private investments in neighborhoods. Such pressures can lead to loss of existing affordable housing in areas experiencing rapid economic growth and a resulting loss of access to opportunity assets for lower income families that previously lived there. Where displacement disproportionately affects persons with certain protected characteristic, the displacement of residents due to economic pressures may exacerbate patterns of residential segregation.

Impediments to mobility

The term “impediments to mobility” refers here to barriers faced by individuals and families when attempting to move to a neighborhood or area of their choice, especially integrated areas and areas of opportunity. This refers to both Housing Choice Vouchers and other public and private housing options. Many factors may impede mobility, including, but not limited to:

- Lack of quality mobility counseling. Mobility counseling is designed to assist families in moving from high-poverty to low-poverty neighborhoods that have greater access to opportunity assets appropriate for each family (e.g. proficient schools for families with children or effective public transportation.). Mobility counseling can include a range of

options including, assistance for families for “second moves” after they have accessed stable housing, and ongoing post-move support for families.

- Lack of appropriate payment standards, including exception payment standards to the standard fair market rent (FMR). Because FMRs are generally set at the 40th percentile of the metropolitan-wide rent distribution, some of the most desirable neighborhoods do not have a significant number of units available in the FMR range. Exception payment standards are separate payment standard amounts within the basic range for a designated part of an FMR area. Small areas FMRs, which vary by zip code, may be used in the determination of potential exception payment standard levels to support a greater range of payment standards.
- Jurisdictional fragmentation among multiple providers of publicly supported housing that serve single metropolitan areas and lack of regional cooperation mechanisms, including PHA jurisdictional limitations.
- HCV portability issues that prevent a household from using a housing assistance voucher issued in one jurisdiction when moving to another jurisdiction where the program is administered by a different local PHA.
- Lack of a consolidated waitlist for all assisted housing available in the metropolitan area.
- Discrimination based on source of income, including SSDI, Housing Choice Vouchers, or other tenant-based rental assistance.

Inaccessible buildings, sidewalks, pedestrian crossings, or other infrastructure

Many public buildings, sidewalks, pedestrian crossings, or other infrastructure components are inaccessible to individuals with disabilities including persons with mobility impairments, individuals who are deaf or hard of hearing, and persons who are blind or have low vision. These accessibility issues can limit realistic housing choice for individuals with disabilities.

Inaccessibility is often manifest by the lack of curb cuts, lack of ramps, and the lack of audible pedestrian signals. While the Americans with Disabilities Act and related civil rights laws establish accessibility requirements for infrastructure, these laws do not apply everywhere and/or may be inadequately enforced.

Inaccessible government facilities or services

Inaccessible government facilities and services may pose a barrier to fair housing choice for individuals with disabilities by limiting access to important community assets such as public meetings, social services, libraries, and recreational facilities. Note that the concept of accessibility includes both physical access (including to websites and other forms of communication) as well as policies and procedures. While the Americans with Disabilities Act and related civil rights laws require that newly constructed and altered government facilities, as well as programs and services, be accessible to individuals with disabilities, these laws may not apply in all circumstances and/or may be inadequately enforced.

Lack of affordable, accessible housing in a range of unit sizes

What is “affordable” varies by circumstance, but an often used rule of thumb is that a low- or moderate-income family can afford to rent or buy a decent-quality dwelling without spending more than 30 percent of its income. For purposes of this assessment, “accessible housing” refers to housing that accords individuals with disabilities equal opportunity to use and enjoy a dwelling. Characteristics that affect accessibility may include physical accessibility of units and public and common use areas of housing, as well as application procedures, such as first come first serve waitlists, inaccessible websites or other technology, denial of access to individuals with assistance animals, or lack of information about affordable accessible housing. The clustering of affordable, accessible housing with a range of unit sizes may also limit fair housing choice for individuals with disabilities.

Lack of affordable in-home or community-based supportive services

The term “in-home or community-based supportive services” refers here to medical and other supportive services available for targeted populations, such as individuals with mental illnesses, cognitive or developmental disabilities, and/or physical disabilities in their own home or community (as opposed to in institutional settings). Such services include personal care, assistance with housekeeping, transportation, in-home meal service, integrated adult day services and other services (including, but not limited to, medical, social, education, transportation, housing, nutritional, therapeutic, behavioral, psychiatric, nursing, personal care, and respite). They also include assistance with activities of daily living such as bathing, dressing, eating, and using the toilet, shopping, managing money or medications, and various household management activities, such as doing laundry. Public entities must provide services to individuals with disabilities in community settings rather than institutions when: 1) such services are appropriate to the needs of the individual; 2) the affected persons do not oppose community-based treatment; and 3) community-based services can be reasonably accommodated, taking into account the resources available to the public entity and the needs of others who are receiving disability-related services from the entity. Assessing the cost and availability of these services is also an important consideration, including the role of state Medicaid agencies. The outreach of government entities around the availability of community supports to persons with disabilities in institutions may impact these individuals’ knowledge of such supports and their ability to transition to community-based settings.

Lack of affordable, integrated housing for individuals who need supportive services

What is “affordable” varies by the circumstances affecting the individual, and includes the cost of housing and services taken together. Integrated housing is housing where individuals with disabilities can live and interact with persons without disabilities to the fullest extent possible. In its 1991 rulemaking implementing Title II of the ADA, the U.S. Department of Justice defined “the most integrated setting appropriate to the needs of qualified individuals with disabilities” as “a setting that enables individuals with disabilities to interact with nondisabled persons to the fullest extent possible.” By contrast, segregated settings are occupied exclusively or primarily by individuals with disabilities. Segregated settings sometimes have qualities of an institutional nature, including, but not limited to, regimentation in daily activities, lack of privacy or autonomy, policies limiting visitors, limits on individuals’ ability to engage freely in community activities and manage their own activities of daily living, or daytime activities primarily with other individuals with disabilities. For purposes of this tool “supportive services” means medical and other voluntary supportive services available for targeted populations groups, such as individuals with mental illnesses, intellectual or developmental disabilities, and/or physical disabilities, in their own home or community (as opposed to institutional settings). Such services may include personal care, assistance with housekeeping, transportation, in-home meal service, integrated adult day services and other services. They also include assistance with activities of daily living such as bathing, dressing, and using the toilet, shopping, managing money or medications, and various household management activities, such as doing laundry.

Lack of assistance for housing accessibility modifications

The term “housing accessibility modification” refers here to structural changes made to existing premises, occupied or to be occupied by a person with a disability, in order to afford such person full enjoyment and use of the premises. Housing accessibility modifications can include structural changes to interiors and exteriors of dwellings and to common and public use areas. Under the Fair Housing Act, landlords are required by fair housing laws to permit certain reasonable modifications to a housing unit, but are not required to pay for the modification unless the housing provider is a recipient of Federal financial assistance and therefore subject to Section 504 of the Rehabilitation Act or is covered by the Americans with Disabilities Act (in such cases the recipient must pay for

the structural modification as a reasonable accommodation for an individual with disabilities). However, the cost of these modifications can be prohibitively expensive. Jurisdictions may consider establishing a modification fund to assist individuals with disabilities in paying for modifications or providing assistance to individuals applying for grants to pay for modifications.

Lack of assistance for transitioning from institutional settings to integrated housing

The integration mandate of the ADA and *Olmstead v. L.C.*, 527 U.S. 581 (1999) (*Olmstead*) compels states to offer community-based health care services and long-term services and supports for individuals with disabilities who can live successfully in housing with access to those services and supports. In practical terms, this means that states must find housing that enables them to assist individuals with disabilities to transition out of institutions and other segregated settings and into the most integrated setting appropriate to the needs of each individual with a disability. A critical consideration in each state is the range of housing options available in the community for individuals with disabilities and whether those options are largely limited to living with other individuals with disabilities, or whether those options include substantial opportunities for individuals with disabilities to live and interact with individuals without disabilities. For further information on the obligation to provide integrated housing opportunities, please refer to HUD's Statement on the Role of Housing in Accomplishing the Goals of *Olmstead*, the U.S. Department of Justice's Statement on *Olmstead* Enforcement, as well as the U.S. Department of Health and Human Services' Centers for Medicare and Medicaid Services final rule and regulations regarding Home and Community-Based Setting requirements. Policies that perpetuate segregation may include: inadequate community-based services; reimbursement and other policies that make needed services unavailable to support individuals with disabilities in mainstream housing; conditioning access to housing on willingness to receive supportive services; incentivizing the development or rehabilitation of segregated settings. Policies or practices that promote community integration may include: the administration of long-term State or locally-funded tenant-based rental assistance programs; applying for funds under the Section 811 Project Rental Assistance Demonstration; implementing special population preferences in the HCV and other programs; incentivizing the development of integrated supportive housing through the LIHTC program; ordinances banning housing discrimination on the basis of source of income; coordination between housing and disability services agencies; increasing the availability of accessible public transportation.

Lack of community revitalization strategies

The term "community revitalization strategies" refers here to realistic planned activities to improve the quality of life in areas that lack public and private investment, services and amenities, have significant deteriorated and abandoned properties, or other indicators of community distress. Revitalization can include a range of activities such as improving housing, attracting private investment, creating jobs, and expanding educational opportunities or providing links to other community assets. Strategies may include such actions as rehabilitating housing; offering economic incentives for housing developers/sponsors, businesses (for commercial and employment opportunities), bankers, and other interested entities that assist in the revitalization effort; and securing financial resources (public, for-profit, and nonprofit) from sources inside and outside the jurisdiction to fund housing improvements, community facilities and services, and business opportunities in neighborhoods in need of revitalization. When a community is being revitalized, the preservation of affordable housing units can be a strategy to promote integration.

Lack of local private fair housing outreach and enforcement

The term "local private fair housing outreach and enforcement" refers to outreach and enforcement actions by private individuals and organizations, including such actions as fair housing education, conducting testing, bring lawsuits, arranging and implementing settlement agreements. A lack of private enforcement is often the result of a lack of resources or a lack of awareness about rights

under fair housing and civil rights laws, which can lead to under-reporting of discrimination, failure to take advantage of remedies under the law, and the continuation of discriminatory practices. Activities to raise awareness may include technical training for housing industry representatives and organizations, education and outreach activities geared to the general public, advocacy campaigns, fair housing testing and enforcement.

Lack of local public fair housing enforcement

The term “local public fair housing enforcement” refers here to enforcement actions by State and local agencies or non-profits charged with enforcing fair housing laws, including testing, lawsuits, settlements, and fair housing audits. A lack of enforcement is a failure to enforce existing requirements under state or local fair housing laws. This may be assessed by reference to the nature, extent, and disposition of housing discrimination complaints filed in the jurisdiction.

Lack of private investment in specific neighborhoods

The term “private investment” refers here to investment by non-governmental entities, such as corporations, financial institutions, individuals, philanthropies, and non-profits, in housing and community development infrastructure. Private investment can be used as a tool to advance fair housing, through innovative strategies such as mixed-use developments, targeted investment, and public-private partnerships. Private investments may include, but are not limited to: housing construction or rehabilitation; investment in businesses; the creation of community amenities, such as recreational facilities and providing social services; and economic development of the neighborhoods that creates jobs and increase access to amenities such as grocery stores, pharmacies, and banks. It should be noted that investment solely in housing construction or rehabilitation in areas that lack other types of investment may perpetuate fair housing issues. While “private investment” may include many types of investment, to achieve fair housing outcomes such investments should be strategic and part of a comprehensive community development strategy.

Lack of public investment in specific neighborhoods, including services or amenities

The term “public investment” refers here to the money government spends on housing and community development, including public facilities, infrastructure, and services. Services and amenities refer to services and amenities provided by local or state governments. These services often include sanitation, water, streets, schools, emergency services, social services, parks and transportation. Lack of or disparities in the provision of municipal and state services and amenities have an impact on housing choice and the quality of communities. Inequalities can include, but are not limited to disparity in physical infrastructure (such as whether or not roads are paved or sidewalks are provided and kept up); differences in access to water or sewer lines, trash pickup, or snow plowing. Amenities can include, but are not limited to recreational facilities, libraries, and parks. Variance in the comparative quality and array of municipal and state services across neighborhoods impacts fair housing choice.

Lack of regional cooperation

The term “regional cooperation” refers here to formal networks or coalitions of organizations, people, and entities working together to plan for regional development. Cooperation in regional planning can be a useful approach to coordinate responses to identified fair housing issues and contributing factors because fair housing issues and contributing factors not only cross multiple sectors—including housing, education, transportation, and commercial and economic development—but these issues are often not constrained by political-geographic boundaries. When there are regional patterns in segregation or R/ECAP, access to opportunity, disproportionate housing needs, or the concentration of affordable housing there may be a lack of regional cooperation and fair housing choice may be restricted.

Lack of resources for fair housing agencies and organizations

A lack of resources refers to insufficient resources for public or private organizations to conduct fair housing activities including testing, enforcement, coordination, advocacy, and awareness-raising. Fair housing testing has been particularly effective in advancing fair housing, but is rarely used today because of costs. Testing refers to the use of individuals who, without any bona fide intent to rent or purchase a home, apartment, or other dwelling, pose as prospective buyers or renters of real estate for the purpose of gathering information, which may indicate whether a housing provider is complying with fair housing laws. “Resources” as used in this factor can be either public or private funding or other resources. Consider also coordination mechanisms between different enforcement actors.

Lack of Source of income protection

This contributing factor refers to the lack of protection for renters from refusal by housing providers to accept tenants based on type of income. This type of discrimination often occurs against individuals receiving assistance payments such as Supplemental Security Income (SSI) or other disability income, social security or other retirement income, or tenant-based rental assistance, including Housing Choice Vouchers. Refusal to accept some sources of income discrimination may significantly limit fair housing choice for individuals with certain protected characteristics. Legislation to eliminate of source of income discrimination and the acceptance of payment for housing, regardless of source or type of income, may increase fair housing choice and access to opportunity.

Lack of state or local fair housing laws

State and local fair housing laws are important to fair housing outcomes. Consider laws that are comparable or “substantially equivalent” to the Fair Housing Act or other relevant federal laws affecting fair housing laws, as well as those that include additional protections. Examples of state and local laws affecting fair housing include legislation banning source of income discrimination, protections for individuals based on sexual orientation, age, survivors of domestic violence, or other characteristics, mandates to construct affordable housing, and site selection policies. Also consider changes to existing State or local fair housing laws, including the proposed repeal or dilution of such legislation.

Land use and zoning laws

The term “land use and zoning laws” generally refers to regulation by State or local government of the use of land and buildings, including regulation of the types of activities that may be conducted, the density at which those activities may be performed, and the size, shape and location of buildings and other structures or amenities. Zoning and land use laws affect housing choice by determining where housing is built, what type of housing is built, who can live in that housing, and the cost and accessibility of the housing. Examples of such laws and policies include, but are not limited to:

- Limits on multi-unit developments, which may include outright bans on multi-unit developments or indirect limits such as height limits and minimum parking requirements.
- Minimum lot sizes, which require residences to be located on a certain minimum sized area of land.
- Occupancy restrictions, which regulate how many persons may occupy a property and, sometimes, the relationship between those persons (refer also to occupancy codes and restrictions for further information).
- Lack of inclusionary zoning practices that mandate or incentivize the creation of affordable units.

- Requirements for special use permits for all multifamily properties or multifamily properties serving individuals with disabilities.
- Growth management ordinances.
- Restriction or allowance of provision of services to persons experiencing homelessness, such as limiting transitional shelters, day shelters, soup kitchens, the provision of other services, or limitations on homeless persons' access areas that are open to the public (e.g., anti-loitering or nuisance ordinances).

Lending Discrimination

The term “lending discrimination” refers here to unequal treatment based on protected class in the receipt of financial services and in residential real estate related transactions. These services and transactions encompass a broad range of transactions, including but not limited to: the making or purchasing of loans or other financial assistance for purchasing, constructing, improving, repairing, or maintaining a dwelling, as well as the selling, brokering, or appraising or residential real estate property. Discrimination in these transaction includes, but is not limited to: refusal to make a mortgage loan or refinance a mortgage loan; refusal to provide information regarding loans or providing unequal information; imposing different terms or conditions on a loan, such as different interest rates, points, or fees; discriminating in appraising property; refusal to purchase a loan or set different terms or conditions for purchasing a loan; discrimination in providing other financial assistance for purchasing, constructing, improving, repairing, or maintaining a dwelling or other financial assistance secured by residential real estate; and discrimination in foreclosures and the maintenance of real estate owned properties.

Location of accessible housing

The location of accessible housing can limit fair housing choice for individuals with disabilities. For purposes of this assessment, accessible housing refers to housing opportunities in which individuals with disabilities have equal opportunity to use and enjoy a dwelling. Characteristics that affect accessibility may include physical accessibility of units and public and common use areas of housing, as well as application procedures, such as first come first serve waitlists, inaccessible websites or other technology, denial of access to individuals with assistance animals, or lack of information about affordable accessible housing. Federal, state, and local laws apply different accessibility requirements to housing. Generally speaking, multifamily housing built in 1991 or later must have accessibility features in units and in public and common use areas for persons with disabilities in accordance with the requirements of the Fair Housing Act. Housing built by recipients of Federal financial assistance or by, on behalf of, or through programs of public entities must have accessibility features in units and in public and common use areas, but the level of accessibility required may differ depending on when the housing was constructed or altered. Single-family housing is generally not required to be accessible by Federal law, except accessibility requirements typically apply to housing constructed or operated by a recipient of Federal financial assistance or a public entity. State and local laws differ regarding accessibility requirements. An approximation that may be useful in this assessment is that buildings built before 1992 tend not to be accessible.

Location of employers

The geographic relationship of job centers and large employers to housing, and the linkages between the two (including, in particular, public transportation) are important components of fair housing choice. Include consideration of the type of jobs available, variety of jobs available, job training opportunities, benefits and other key aspects that affect job access.

Location of environmental health hazards

The geographic relationship of environmental health hazards to housing is an important component

of fair housing choice. When environmental health hazards are concentrated in particular areas, neighborhood health and safety may be compromised and patterns of segregation entrenched. Environmental issues affecting health can include access to safe and clean drinking water, soil contamination, excessive air pollution, and indoor health hazards (lead based paint, radon, mold, asbestos). Relevant factors to consider include the type and number of hazards, the degree of concentration or dispersion (including in older housing stock), and health effects such as asthma, cancer clusters, obesity, etc. Additionally, industrial siting policies and incentives for the location of housing may be relevant to this factor.

Location of proficient schools and school assignment policies

The geographic relationship of proficient schools to housing, and the policies that govern attendance, are important components of fair housing choice. The quality of schools is often a major factor in deciding where to live and school quality is also a key component of economic mobility. Relevant factors to consider include whether proficient schools are clustered in a portion of the jurisdiction or region, the range of housing opportunities close to proficient schools, and whether the jurisdiction has policies that enable students to attend a school of choice regardless of place of residence. Policies to consider include, but are not limited to: inter-district transfer programs, limits on how many students from other areas a particular school will accept, and enrollment lotteries that do not provide access for the majority of children.

Location and type of affordable housing

Affordable housing includes, but is not limited to publicly supported housing; however, each category of publicly supported housing often serves different income-eligible populations at different levels of affordability. What is “affordable” varies by circumstance, but an often used rule of thumb is that a low- or moderate-income family can afford to rent or buy a decent-quality dwelling without spending more than 30 percent of its income. The location of housing encompasses the current location as well as past siting decisions. The location of affordable housing can limit fair housing choice, especially if the housing is located in segregated areas, R/ECAPs, or areas that lack access to opportunity. The type of housing (whether the housing primarily serves families with children, elderly persons, or persons with disabilities) can also limit housing choice, especially if certain types of affordable housing are located in segregated areas, R/ECAPs, or areas that lack access to opportunity, while other types of affordable housing are not. The provision of affordable housing is often important to individuals with protected characteristics because they are disproportionately represented among those that would benefit from low-cost housing.

Occupancy codes and restrictions

The term “occupancy codes and restrictions” refers here to State and local laws, ordinances, and regulations that regulate who may occupy a property and, sometimes, the relationship between those persons. Standards for occupancy of dwellings and the implication of those standards for persons with certain protected characteristics may affect fair housing choice. Occupancy codes and restrictions include, but are not limited to:

- Occupancy codes with “persons per square foot” standards.
- Occupancy codes with “bedrooms per persons” standards.
- Restrictions on number of unrelated individuals in a definition of “family.”
- Restrictions on occupancy to one family in single family housing along with a restricted definition of “family.”
- Restrictions that directly or indirectly affect occupancy based on national origin, religion, or any other protected characteristic.
- Restrictions on where voucher holders can live.

- Restriction or allowance of provision of housing or services to persons experiencing homelessness, such as limiting transitional shelters, day shelters, soup kitchens, or other provision of services

Private Discrimination

The term “private discrimination” refers here to discrimination in the private housing market that is illegal under the Fair Housing Act or related civil rights statutes. This may include, but is not limited to, discrimination by landlords, property managers, home sellers, real estate agents, lenders, homeowners’ associations, and condominium boards. Some examples of private discrimination include:

- Refusal of housing providers to rent to individuals because of a protected characteristic.
- The provision of disparate terms, conditions, or information related to the sale or rental of a dwelling to individuals with protected characteristics.
- Steering of individuals with protected characteristics by a real estate agent to a particular neighborhood or area at the exclusion of other areas.
- Failure to grant a reasonable accommodation or modification to persons with disabilities.
- Prohibitions, restrictions, or limitations on the presence or activities of children within or around a dwelling.

Useful references for the extent of private discrimination may be number and nature of complaints filed against housing providers in the jurisdiction, testing evidence, and unresolved violations of fair housing and civil rights laws.

Quality of affordable housing information programs

The term “affordable housing information programs” refers here to the provision of information related to affordable housing to potential tenants and organizations that serve potential tenants, including the maintenance, updating, and distribution of the information. This information includes: but is not limited to, listings of affordable housing opportunities or local landlords who accept Housing Choice Vouchers; mobility counseling programs; and community outreach to potential beneficiaries. The quality of such information relates to, but is not limited to:

- How comprehensive the information is (e.g. that the information provided includes a variety of neighborhoods, including those with access to opportunity indicators)
- How up-to-date the information is (e.g. that the publicly supported housing entity is taking active steps to maintain, update and improve the information).
- Pro-active outreach to widen the pool of participating rental housing providers, including both owners of individual residences and larger rental management companies.

Regulatory barriers to providing housing and supportive services for persons with disabilities

Some local governments require special use permits for or place other restrictions on housing and supportive services for persons with disabilities, as opposed to allowing these uses as of right. These requirements sometimes apply to all groups of unrelated individuals living together or to some subset of unrelated individuals. Such restrictions may include, but are not limited to, dispersion requirements or limits on the number of individuals residing together. Because special use permits require specific approval by local bodies, they can enable community opposition to housing for persons with disabilities and lead to difficulty constructing this type of units in areas of opportunity or anywhere at all. Other restrictions that limit fair housing choice include requirements that life-safety features appropriate for large institutional settings be installed in housing where supportive services are provided to one or more individuals with disabilities. Note

that the Fair Housing Act makes it unlawful to utilize land use policies or actions that treat groups of persons with disabilities less favorably than groups of persons without disabilities, to take action against, or deny a permit, for a home because of the disability of individuals who live or would live there, or to refuse to make reasonable accommodations in land use and zoning policies and procedures where such accommodations may be necessary to afford persons or groups of persons with disabilities an equal opportunity to use and enjoy housing.

Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs

The term “siting selection” refers here to the placement of new publicly supported housing developments. Placement of new housing refers to new construction or acquisition with rehabilitation of previously unsubsidized housing. State and local policies, practices, and decisions can significantly affect the location of new publicly supported housing. Local policies, practices, and decisions that may influence where developments are sited include, but are not limited to, local funding approval processes, zoning and land use laws, local approval of LIHTC applications, and donations of land and other municipal contributions. For example, for LIHTC developments, the priorities and requirements set out in the governing Qualified Allocation Plan (QAP) influence where developments are located through significant provisions in QAPs such as local veto or support requirements and criteria and points awarded for project location.

Source of income discrimination

The term “source of income discrimination” refers here to the refusal by a housing provider to accept tenants based on type of income. This type of discrimination often occurs against individuals receiving assistance payments such as Supplemental Security Income (SSI) or other disability income, social security or other retirement income, or tenant-based rental assistance, including Housing Choice Vouchers. Source of income discrimination may significantly limit fair housing choice for individuals with certain protected characteristics. The elimination of source of income discrimination and the acceptance of payment for housing, regardless of source or type of income, increases fair housing choice and access to opportunity.

State or local laws, policies, or practices that discourage individuals with disabilities from being placed in or living in apartments, family homes, and other integrated settings

State and local laws, policies, or practices may discourage individuals with disabilities from moving to or being placed in integrated settings. Such laws, policies, or practices may include medical assistance or social service programs that require individuals to reside in institutional or other segregated settings in order to receive services, a lack of supportive services or affordable, accessible housing, or a lack of access to transportation, education, or jobs that would enable persons with disabilities to live in integrated, community-based settings.

Unresolved violations of fair housing or civil rights law

Unresolved violations of fair housing and civil rights laws include determinations or adjudications of a violation or relevant laws that have not been settled or remedied. This includes determinations of housing discrimination by an agency, court, or Administrative Law Judge; findings of noncompliance by HUD or state or local agencies; and noncompliance with fair housing settlement agreements.

**EXHIBIT B – ANALYSIS OF IMPEDIMENTS TO
FAIR HOUSING CHOICE FOR PRINCE GEORGE’S
COUNTY AND THE CITY OF BOWIE, DATED
APRIL 2011 (REVISED JUNE 2012),
ADOPTED BY THE PRINCE GEORGE’S COUNTY
COUNCIL ON NOVEMBER 12, 2013**

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE



PRINCE GEORGE'S COUNTY

RUSHERN L. BAKER, III, COUNTY EXECUTIVE

CITY OF BOWIE

G. FREDERICK ROBINSON, MAYOR

APRIL 2011, REVISED JUNE 2012



PRINCE GEORGE'S COUNTY HUMAN RELATIONS COMMISSION

NICOLE VAUGHAN, CHAIRPERSON

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DISTRICT 2 - WILL CAMPOS

DISTRICT 4 - INGRID M. TURNER

DISTRICT 6 - DERRICK LEON DAVIS

DISTRICT 7 - KAREN R. TOLES

DISTRICT 8 - OBIE PATTERSON

DISTRICT 9 - MEL FRANKLIN

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TODD TURNER, MAYOR PRO TEM

BOWIE CITY COUNCIL

DENNIS BRADY

JAMES MARCOS

DIANE POLANGIN

ISSAC TROUTH

GERALDINE VALENTINO-SMITH

CITY MANAGER: DAVID J. DEUTSCH

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

The Urban County of Prince George’s County and the City of Bowie, Maryland

1.	INTRODUCTION	1
A.	Introduction to the Analysis of Impediments.....	1
B.	Fair Housing Choice	1
C.	Obligation of Entitlement Communities to Affirmatively Further Fair Housing	2
D.	The Federal Fair Housing Act.....	4
i.	What housing is covered?.....	4
ii.	What does the Fair Housing Act prohibit?.....	4
iii.	Additional Protections for People with Disabilities.....	5
iv.	Housing Opportunities for Families with Children	5
E.	Maryland Human Relations Act	6
F.	Prince George’s County Human Relations Commission.....	6
G.	Comparison of Accessibility Standards	7
i.	Fair Housing Act	7
ii.	Americans with Disabilities Act (ADA).....	7
iii.	Uniform Federal Accessibility Standards (UFAS).....	7
iv.	Visitability Standards.....	7
v.	Universal Design.....	8
H.	Methodology	8
I.	Using Census Data.....	9
J.	Urban County Definition	9
K.	Development of the AI	9
i.	Lead Agency.....	9
ii.	Agency Consultation	9
L.	The Relationship between Fair Housing and Affordable Housing.....	10
2.	DEMOGRAPHIC INFORMATION	11
A.	Historical Residential Settlement Patterns	11
B.	Demographic Profile	12
i.	Population Trends.....	12
ii.	Areas of Racial and Ethnic Minority Concentration	16
iii.	Residential Segregation Patterns.....	17
iv.	Race/Ethnicity and Income	23
v.	Concentrations of LMI Persons.....	27
vi.	Disability and Income.....	27
vii.	Familial Status and Income.....	28
viii.	Ancestry, Persons with LEP and Poverty.....	31
ix.	Protected Class Status and Unemployment.....	32
C.	Housing Market.....	32
i.	Housing Inventory	32
ii.	Types of Housing Units.....	33
iii.	Protected Class Status and Home Ownership.....	34



iv.	Foreclosure Trends.....	34
v.	The Tendency of the Protected Classes to Live in Larger Households.....	39
vi.	Cost of Housing	40
vii.	Protected Class Status and Housing Problems	52
3.	EVALUATION OF FAIR HOUSING PROFILE	54
A.	Existence of Fair Housing Complaints.....	54
i.	HUD’s Office of Fair Housing and Equal Opportunity	54
B.	Patterns and Trends in Fair Housing Complaints.....	56
C.	Existence of Fair Housing Legal Proceedings.....	56
D.	Determination of Unlawful Segregation.....	57
4.	EVALUATION OF PUBLIC AND PRIVATE SECTOR POLICIES.....	58
A.	Public Sector Policies	58
i.	Prince George’s County Housing Authority.....	58
ii.	Policies Governing Investment of Entitlement Funds.....	67
iii.	Appointed Boards and Commissions	75
iv.	Accessibility of Residential Dwelling Units	78
v.	Persons with Limited English Proficiency (LEP).....	79
vi.	Comprehensive Planning.....	79
vii.	Zoning.....	81
viii.	Taxes	88
ix.	Public Transit	91
B.	Private Sector Policies.....	94
i.	Mortgage Lending Practices	94
ii.	High-Cost Lending Practices.....	102
C.	Real Estate Practices	106
i.	Prince George’s County Association of Realtors	106
D.	Rental Advertising.....	106
i.	<i>The Bowie Blade-News</i>	106
5.	CURRENT FAIR HOUSING PROFILE.....	108
i.	Progress since Previous AI and Current Fair Housing Activities.....	108
ii.	Other Fair Housing Organizations.....	109
6.	GENERAL FAIR HOUSING OBSERVATIONS	111
7.	IMPEDIMENTS TO FAIR HOUSING CHOICE.....	113
A.	Public Sector.....	113
i.	Urban County of Prince George’s County	113
ii.	City of Bowie.....	119
B.	Private Sector	120



8. FAIR HOUSING ACTION PLAN 121

9. SIGNATURE PAGE FOR THE URBAN COUNTY 124

10. SIGNATURE PAGE FOR THE CITY OF BOWIE 125

11. APPENDIX A – STAKEHOLDER CHART..... 126

12. APPENDIX B – DATA TABLES 128

13. APPENDIX C: GLOSSARY OF TERMS AND ACRONYMS..... 152



Index of Tables and Figures

Figure 1-1 Comparison of Statutory Protections from Housing Discrimination	7
Figure 2-1 Population Trends, 1960-2010	12
Figure 2-2 Population Trends, 1960-2010	13
Figure 2-3 Population by Race and Ethnicity, 1990-2010	14
Figure 2-4 Racial/Ethnic Minority Characteristics in the Urban County, 1990-2010.....	15
Figure 2-5 Racial/Ethnic Minority Characteristics in the City of Bowie, 1990-2010.....	15
Figure 2-6 Maryland Dissimilarity Index Rankings, 2000.....	19
Figure 2-7 Dissimilarity Indices for Prince George’s County, 2010	20
Figure 2-8 Dissimilarity Indices for Bowie, 2000	21
Figure 2-9 Maryland City Dissimilarity Index Rankings, 2000	22
Figure 2-10 Dissimilarity Indices for Bowie, 2010	22
Figure 2-11 Median Household Income and Poverty Rates by Race/Ethnicity, 2009.....	23
Figure 2-12 Median Household Income and Poverty Rates in Surrounding Counties, 2009	24
Figure 2-13 Household Income Distribution by Race, 2009	25
Figure 2-14 Household Income Distribution by Race in the Urban County, 2009	26
Figure 2-15 Household Income Distribution by Race in Bowie, 2009.....	26
Figure 2-16 Households by Type and Presence of Children, 1990-2009.....	29
Figure 2-17 Households by Type and Presence of Children in the Urban County, 1990-2009	30
Figure 2-18 Households by Type and Presence of Children in Bowie, 1990-2009	30
Figure 2-19 Language Spoken at Home in Prince George’s County, 2009	31
Figure 2-20 Civilian Labor Force, 2009.....	32
Figure 2-21 Trends in Housing Inventory in Surrounding Counties, 2000-2010	33
Figure 2-22 Estimated Residential Foreclosure Rates by County, January 2007 – June 2008	36
Figure 2-23 Estimated Residential Foreclosure Rates by Place, January 2007 – June 2008	38
Figure 2-24 Families with Three or More Persons, 2010.....	39
Figure 2-25 Housing Units by Number of Bedrooms, 2010	40
Figure 2-26 Trends in Median Housing Value, Rent, and Income, 1990-2009	41
Figure 2-27 Trends in Median Housing Value, Rent, and Income, 1990-2009	42
Figure 2-28 Loss of Affordable Rental Housing Units, 2000-2010	43
Figure 2-29 Prince George’s County Housing Market Trends, 2001-2010	45
Figure 2-30 Prince George’s County Housing Market Trends, 2000-2009	46
Figure 2-31 Units Sold by Price and Number of Bedrooms, 2006 and 2010.....	47
Figure 2-32 Maximum Affordable Purchase Price by Race/Ethnicity, 2010	48
Figure 2-33 Median Sales Price by County, 2001-2010	49
Figure 2-34 Bowie Sales Housing Market Trends, 2010-2011	50



Figure 2-35 Bowie Housing Market Trends: Sales, 2010 to 2011 50

Figure 2-36 Bowie Housing Market Trends: Average Sale Price, 2010 to 2011 51

Figure 2-37 Lower Income Households with Housing Problems in the Urban County, 2000..... 52

Figure 2-38 Lower Income Households with Housing Problems in Bowie, 2000 53

Figure 3-1 Alleged Bases of Discrimination Complaints filed through FHEO, 2005-2011..... 55

Figure 3-2 Reasons for Closing of Fair Housing Complaints Filed with FHEO, 2005-2011 56

Figure 4-1 Characteristics of Current Public Housing Residents, 2010..... 59

Figure 4-2 Characteristics of Public Housing Applicants, 2010 60

Figure 4-3 Characteristics of Current Section 8 Voucher Holders, 2010..... 63

Figure 4-4 Characteristics of Section 8 Voucher Applicants, 2010..... 64

Figure 4-5 Board and Commission Appointments in the Urban County, 2011 77

Figure 4-6 Residential Zoning Districts 83

Figure 4-7 Medium and High Density Zoning, 2010 84

Figure 4-8 Medium and High Density Zoning, 2010 85

Figure 4-9 Estimated Annual Real Estate Taxes for Select Municipalities, 2010..... 90

Figure 4-10 Percent of Transit-Dependent Households by Tenure, 2009 91

Figure 4-11 Percent of Transit-Dependent Households by Race and Ethnicity, 2000 92

Figure 4-12 Means of Transportation to Work for Workers 16 Years and Older, 2009..... 92

Figure 4-13 Summary Report Based on Action Taken Mortgage Data, 2007-2009..... 95

Figure 4-14 Summary Report Based on Action Taken Mortgage Data, 2009 96

Figure 4-15 Denials by Race and Ethnicity, 2007-2009 98

Figure 4-16 Denials by Race and Ethnicity, 2007-2009 98

Figure 4-17 Denials by Income, 2007-2009..... 99

Figure 4-18 Denials by Race for Lower Income Applicants, 2007-2009..... 100

Figure 4-19 Denials by Race for Upper Income Applicants, 2007-2009..... 100

Figure 4-20 Denial Rates by Race and Income, 2009..... 101

Figure 4-21 High-Cost Lending by Race/Ethnicity and Income, 2007-2009..... 105

Figure 8-1 Fair Housing Action Plan 121

Figure 12-1 Areas of Racial and Ethnic Concentration in the Urban County, 2009 129

Figure 12-2 Areas of Racial and Ethnic Concentration in the City of Bowie, 2009..... 133

Figure 12-3 Areas of LMI Concentration in the Urban County, FY2011 134

Figure 12-4 Areas of LMI Concentration in Bowie, FY2011 135

Figure 12-5 Trends in Housing Inventory in the Urban County, 2000-2009 136

Figure 12-6 Trends in Total Housing Inventory in Bowie, 2000-2009..... 141

Figure 12-7 Housing Units in Structures in the Urban County, 2009..... 142

Figure 12-8 Housing Units in Structures in Bowie, 2009 146

Figure 12-9 Housing Tenure by Race/Ethnicity in the Urban County, 2009..... 147

Figure 12-10 Housing Tenure by Race/Ethnicity in Bowie, 2009 151

1. Introduction

A. Introduction to the Analysis of Impediments

The Urban County of Prince George's County and the City of Bowie have prepared an Analysis of Impediments to Fair Housing Choice to satisfy requirements of the Housing and Community Development Act of 1974, as amended. This act requires that any community receiving Community Development Block Grant (CDBG) funds affirmatively further fair housing. As a result, the Urban County and City are charged with the responsibility of conducting their CDBG programs in compliance with the federal Fair Housing Act. The responsibility of compliance with the federal Fair Housing Act extends to nonprofit organizations and other entities, including units of local government, which receive federal funds through the Urban County and the City.

Entitlement communities receive CDBG to:

- Examine and attempt to alleviate housing discrimination within their jurisdiction
- Promote fair housing choice for all persons
- Provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, sex, disability, familial status, or national origin
- Promote housing that is accessible to and usable by persons with disabilities, and
- Comply with the non-discrimination requirements of the Fair Housing Act. These requirements can be achieved through the preparation of an Analysis of Impediments to Fair Housing Choice.

The Analysis of Impediments to Fair Housing Choice (AI) is a review of a jurisdiction's laws, regulations, and administrative policies, procedures, and practices affecting the location, availability, and accessibility of housing, as well as an assessment of conditions, both public and private, affecting fair housing choice.

B. Fair Housing Choice

Equal and free access to residential housing (housing choice) is a fundamental right that enables members of the protected classes to pursue personal, educational, employment or other goals. Because housing choice is so critical to personal development, fair housing is a goal that government, public officials and private citizens must embrace if equality of opportunity is to become a reality.

Under federal law, fair housing choice is defined as the ability of persons, regardless of race, color, religion, sex, disability, familial status, or national origin, of similar income levels to have available to them the same housing choices. Persons who are protected from discrimination by fair housing laws are referred to as members of the protected classes.

This Analysis encompasses the following five areas related to fair housing choice:

- The sale or rental of dwellings (public and private)
- The provision of financing assistance for dwellings
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside impacted areas, and



- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by the U.S. Department of Housing and Urban Development (HUD) regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570 (i.e., the CDBG program regulations) and/or 24 CFR Part 92 (i.e., the HOME program regulations).

As federal entitlement communities, the Urban County and City of Bowie have specific fair housing planning responsibilities. These include:

- Conducting an Analysis of Impediments to Fair Housing Choice
- Developing actions to overcome the effects of identified impediments to fair housing, and
- Maintaining records to support the jurisdictions' initiatives to affirmatively further fair housing.

HUD interprets these three certifying elements to include:

- Analyzing housing discrimination in a jurisdiction and working toward its elimination
- Promoting fair housing choice for all people
- Providing racially and ethnically inclusive patterns of housing occupancy
- Promoting housing that is physically accessible to, and usable by, all people, particularly individuals with disabilities, and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

This Analysis will:

- Evaluate population, household, income and housing characteristics by protected classes in each of the jurisdictions
- Evaluate public and private sector policies that impact fair housing choice
- Identify blatant or de facto impediments to fair housing choice, where any may exist, and
- Recommend specific strategies to overcome the effects of any identified impediments.

HUD defines an impediment to fair housing choice as any actions, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices, based on race, color, religion, sex, disability, familial status, or national origin.

This Analysis serves as the basis for fair housing planning, provides essential information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates, and assists in building public support for fair housing efforts. The elected governmental body is expected to review and approve the Analysis and use it for direction, leadership, and resources for future fair housing planning.

The Analysis will serve as a "point-in-time" baseline against which future progress in terms of implementing fair housing initiatives will be judged and recorded.

C. Obligation of Entitlement Communities to Affirmatively Further Fair Housing

In August 2009, Westchester County, NY settled a fair housing lawsuit brought against the County by the Anti-Discrimination Center of Metro New York, Inc. The outcome of this lawsuit is relevant to all HUD urban counties, including Prince George's County.

This \$180 million lawsuit filed in April 2006 charged that Westchester County failed to fulfill its obligation to affirmatively further fair housing and ensure non-discrimination in its programs. Westchester County is an Urban County entitlement under HUD's CDBG and HOME Programs. As a condition of federal



funding, all such HUD entitlements certify to HUD each year that they will conduct their entitlement programs in a non-discriminatory manner that affirmatively furthers fair housing in accordance with the Civil Rights Act of 1964 and the federal Fair Housing Act. In making this certification, Westchester County was required to identify impediments to fair housing choice, take action to overcome those impediments, and to maintain records of its analysis and actions.

In the lawsuit, the Center charged that:

- Westchester County is a racially segregated county
- Westchester County's Analysis of Impediments to Fair Housing Choice (AI) was flawed because it considered housing needs based solely on income and failed to fully consider racial segregation and housing needs based on race
- Westchester County failed to inform municipalities receiving CDBG funds of their own obligation to consider the housing needs of persons living outside the communities, not just the needs of residents living within their municipal limits
- Westchester County failed to require municipalities receiving CDBG funds to increase the availability of affordable housing or otherwise affirmatively further fair housing
- As a result of the above, Westchester County made a false claim when it certified to HUD that the County would affirmatively further fair housing.

At issue in this case was not whether Westchester County created affordable housing. In fact, since 1998, the County spent over \$50 million in federal and state funds to aid in the construction of 1,370 affordable rental units and another 334 affordable owner units. It was the *geographic location* of the affordable housing units that were created within the County that was the critical factor in the lawsuit.

The Center alleged that the County's AI did not analyze how its placement of affordable housing affected segregation and racial diversity. It concluded that the County assisted the development of affordable housing units in lower income communities and that as a result, it increased the pattern of racial segregation in Westchester County. Furthermore, the suit charged that the County violated its cooperation agreements with local units of government which prohibits expenditures of CDBG funds for activities in communities that do not affirmatively further fair housing within their jurisdiction or otherwise impede the County's action to comply with its fair housing certifications.

Faced with the threat of losing the \$180 million lawsuit and being cut off from another \$30 million in HUD funding, Westchester County agreed to a settlement with HUD and the Anti-Discrimination Center of Metro New York. Under the terms of the settlement, the County will pay \$21.6 million to HUD in non-federal funds. These funds will be deposited in the County's HUD account and used to build new affordable housing units in specified census tracts with populations of less than 3% Black and 7% Hispanic residents. An additional \$11 million will be paid to HUD, the Center and its counsel. The County will add \$30 million to its capital budget to build affordable housing in non-impacted (i.e., primarily White) areas. It is anticipated that the County will issue bonds to meet its financial obligations under the settlement.

The significance of this legal settlement for urban county entitlements throughout the U.S. is clear. First, *the requirement to affirmatively further fair housing applies to all aspects of county government, not just HUD programs.* Second, the lawsuit confirms that *an urban county has an obligation to ensure that each local unit of government within its boundary affirmatively furthers fair housing.* When an urban county makes this pledge to HUD, it is making the promise not just in its own right but also on behalf of each local unit of government in the county. This does not necessarily mean that each municipality must finance and develop affordable housing, but it does mean that no municipality may impede or obstruct the creation of such housing by other entities. An urban county should provide CDBG and HOME funds to municipalities that affirmatively further fair housing. Furthermore, an urban county should not provide



CDBG and HOME funds to municipalities that impede fair housing as such actions undermine the urban county's own obligation to affirmatively further fair housing. Finally, an urban county must take action to eliminate barriers to fair housing wherever they may exist in the county. While the City of Bowie is not an urban county, as an entitlement community it is required to affirmatively further fair housing choice within its jurisdiction.

D. The Federal Fair Housing Act

i. What housing is covered?

The federal Fair Housing Act covers most housing. In some circumstances, the Act exempts owner-occupied buildings with no more than four units, single family housing sold or rented without the use of a broker, and housing operated by organizations and private clubs that limit occupancy to members.

ii. What does the Fair Housing Act prohibit?

a. In the Sale and Rental of Housing

No one may take any of the following actions based on race, color, religion, sex, disability, familial status or national origin:

- Refuse to rent or sell housing
- Refuse to negotiate for housing
- Make housing unavailable
- Deny a dwelling
- Set different terms, conditions or privileges for the sale or rental of a dwelling
- Provide different housing services or facilities
- Falsely deny that housing is available for inspection, sale, or rental
- For profit, persuade owners to sell or rent (blockbusting), or
- Deny anyone access to or membership in a facility or service (such as a multiple listing service) related to the sale or rental of housing.

b. In Mortgage Lending

No one may take any of the following actions based on race, color, religion, sex, disability, familial status or national origin:

- Refuse to make a mortgage loan
- Refuse to provide information regarding loans
- Impose different terms or conditions on a loan, such as different interest rates, points, or fees
- Discriminate in appraising property
- Refuse to purchase a loan, or
- Set different terms or conditions for purchasing a loan.

c. Other Prohibitions

It is illegal for anyone to:

- Threaten, coerce, intimidate or interfere with anyone exercising a fair housing right or assisting others who exercise that right

- Advertise or make any statement that indicates a limitation or preference based on race, color, religion, sex, disability, familial status, or national origin. This prohibition against discriminatory advertising applies to single family and owner-occupied housing that is otherwise exempt from the Fair Housing Act.

iii. Additional Protections for People with Disabilities

If someone has a physical or mental disability (including hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex and mental retardation) that substantially limits one or more major life activities, or has a record of such a disability, or is regarded as having such a disability, a landlord may not:

- Refuse to let the disabled person make reasonable modifications to a dwelling or common use areas, at the disabled person's expense, if necessary for the disabled person to use the housing. Where reasonable, the landlord may permit changes only if the disabled person agrees to restore the property to its original condition when he or she moves.
- Refuse to make reasonable accommodations in rules, policies, practices or services if necessary for the disabled person to use the housing.

For example, a building with a "no pets" policy must make a reasonable accommodation and allow a visually impaired tenant to keep a guide dog.

iv. Housing Opportunities for Families with Children

Unless a building or community qualifies as housing for older persons, it may not discriminate based on familial status. That is, it may not discriminate against families in which one or more children under the age 18 live with:

- A parent or
- A person who has legal custody of the child or children or
- The designee of the parent or legal custodian, with the parent or custodian's written permission.

Familial status protection also applies to pregnant women and anyone securing legal custody of a child under age 18.

Housing for older persons is exempt from the prohibition against familial status discrimination if:

- The HUD Secretary has determined that it is specifically designed for and occupied by elderly persons under a federal, state or local government program, or
- It is occupied solely by persons who are 62 or older, or
- It houses at least one person who is 55 or older in at least 80% of the occupied units, and adheres to a policy that demonstrates the intent to house persons who are 55 or older, as previously described.

A transition period permits residents on or before September 13, 1988 to continue living in the housing, regardless of their age, without interfering with the exemption.



E. Maryland Human Relations Act

The Maryland Human Relations Act prohibits housing discrimination on the basis of race, color, religion, sex, familial status, national origin, marital status, disability, or sexual orientation. As a result, persons in Maryland have greater protection under the State's fair housing law than under the federal Fair Housing Act.

Specifically, the Maryland Human Relations Act prohibits the following practices:

- Refusing to negotiate, sell or rent a dwelling to any qualified buyer or renter;
- Using discriminatory terms and conditions in selling or renting;
- Communicating that a dwelling is not available for inspection, sale or rent, when in fact it is available;
- Attempting to steer persons into or away from neighborhoods or apartment complexes that are racially segregated;
- Setting terms and conditions of home loans in such a way as to discriminate;
- Restricting membership or participation in a multi-listing service or similar organization related to the business of selling and renting real estate;
- Using discriminatory notices or advertisements indicating any preference or discriminatory limitation;
- Treating a person differently from someone else because of their race, disability, familial status, religion, sex, marital status, national origin or sexual orientation;
- Committing acts of prejudice, violence, harassment, intimidation, or abuse directed against families or individuals or their residential property;
- Perpetuating segregated housing patterns.

The Human Relations Act establishes the Maryland Commission on Human Relations (MDCHR), which is the enforcement body of the law. MDCHR investigates fair housing complaints and determines if there is probable cause of discrimination. In cases where the matter cannot be conciliated, MDCHR delegates the case to an administrative judge to conduct a hearing in the county where the discriminatory housing practice is alleged to have occurred. The administrative judge may then award up to \$50,000 in damages (to be paid to the State's General Fund) as well as actual damages to the complainant.

Maryland's Human Relations Act is considered substantially equivalent to the federal Fair Housing Act, and MDCHR is a FHAP agency.

F. Prince George's County Human Relations Commission

The Prince George's County Code establishes the Human Relation Commission (HRC) in Section 2-185. Additionally, Section 2-185 extends protection from discrimination to include age, occupation, political opinion, and personal appearance. If a resident of Prince George's County believes they have been discriminated, they may file a complaint with the HRC, which will investigate and attempt to conciliate the complaint. Cases may then be forwarded to the Maryland Commission on Human Relations, which has enforcement authority.

The following chart depicts the protected classes of the various fair housing statutes for County residents.

Urban County of Prince George's County and the City of Bowie



**Figure 1-1
Comparison of Statutory Protections from Housing Discrimination**

Protected Class	Federal Fair Housing Act	Maryland Human Relations Act	Prince George's County Human Relations Commission
Race	•	•	•
Color	•	•	•
National Origin	•	•	•
Religion	•	•	•
Sex	•	•	•
Familial Status	•	•	•
Disability	•	•	•
Marital Status		•	•
Sexual Orientation		•	•
Age			•
Occupation			•
Political Opinion			•
Personal Appearance			•

G. Comparison of Accessibility Standards

There are several standards of accessibility that are referenced throughout the AI. These standards are listed below along with a summary of the features within each category or a direct link to the detailed standards.

i. Fair Housing Act

These standards are listed in section D.iii. above.

ii. Americans with Disabilities Act (ADA)

ADA standards are required for accessibility to places of public accommodation and commercial facilities by individuals with disabilities. These guidelines are to be applied during the design, construction, and alteration of such buildings and facilities to the extent required by regulations issued by federal agencies, including the Department of Justice, under the Americans with Disabilities Act of 1990. A complete description of the guidelines can be found at www.ada.gov/stdspdf.htm.

iii. Uniform Federal Accessibility Standards (UFAS)

UFAS accessibility standards are required for facility accessibility by physically handicapped persons for Federal and federally-funded facilities. These standards are to be applied during the design, construction, and alteration of buildings and facilities to the extent required by the Architectural Barriers Act of 1968, as amended. A complete description of the guidelines can be found at www.access-board.gov/ufas/ufas-html/ufas.htm.

iv. Visitability Standards

The term “visitability” refers to single-family housing designed in such a way that it can be lived in or visited by people with disabilities. A house is visitable when it meets three basic requirements:



- At least one no-step entrance
- Doors and hallways wide enough to navigate a wheelchair through, and
- A bathroom on the first floor big enough to get into in a wheelchair, and close the door.

v. Universal Design

Universal design is the design of products and environments to be usable by all people, to the greatest extent possible, without adaptation or specialized design. Seven principles guide Universal Design. These include:

- Equitable use (e.g., make the design appealing to all users)
- Flexibility in use (e.g., accommodate right- or left-handed use)
- Simple and intuitive use (e.g., eliminate unnecessary complexity)
- Perceptible information (e.g., provide compatibility with a variety of techniques or devices used by people with sensory limitations)
- Tolerance for error (e.g., provide fail-safe features)
- Low physical effort (e.g., minimize repetitive actions)
- Size and space for approach and use (e.g., accommodate variations in hand and grip size).

H. Methodology

The firm of Mullin & Lonergan Associates, Inc. (M&L) was retained as consultants to conduct the Analysis of Impediments to Fair housing Choice. M&L utilized a comprehensive approach involving the Urban County and the City of Bowie. The following sources were utilized:

- The most recently available demographic data regarding population, household, housing, income, and employment at the census tract and municipal level. Generally, data available as of February and March, 2011 was utilized in this report.
- Public policies affecting the siting and development of housing
- Administrative policies concerning housing and community development
- Financial lending institution data from the Home Mortgage Disclosure Act (HMDA) database
- Agencies that provide housing and housing related services to members of the protected classes
- Consolidated Plans, Annual Plans, and CAPERs from the Urban County and City of Bowie
- The 1996 Analysis of Impediments to Fair Housing Choice
- Fair housing complaints filed with HUD
- Real estate advertisements from *The Bowie Blade-News*
- 2000 CHAS data tables available from HUD
- 2000 residential segregation data available from CensusScope, and 2010 dissimilarity indexing for the County as calculated by Mullin & Lonergan Associates using the methodology of CensusScope
- Interviews and focus group sessions conducted with agencies and organizations that provide housing and housing related services to members of the protected classes.

I. Using Census Data

Because statistics in census data products are based on the collection, tabulation, editing, and handling of questionnaires, errors in the data are possible. In addition to errors occurring during data collection, much of the census data is based on Summary File 3 (SF3) sample data rather than Summary File 1 (SF1) data, which is 100-percent data. Each data set is subject to sampling error and non-sampling error, respectively. Non-sampling error includes confidentiality edits applied by the Census Bureau to assure that data does not disclose information about specific individuals, households, or housing units. Because of sampling and non-sampling errors, there may be discrepancies in the reporting of similar type of data. These discrepancies do not negate the usefulness of the census data.

Data from varying years are provided throughout the analysis. In most instances, the type of analysis presented dictated the date and source of data used. For example, for overall analyses of total county and city characteristics such as population, it was possible and practical to use decennial census data from 1960 through 2009. However, in most cases involving analysis at the census tract level, data from 2000 and 2009 were used; data from earlier decennial censuses would not have been comparable due to the changes in census tract boundaries over the decades. In all cases, the most current data available at the time this report was drafted (February through April, 2011) was utilized.

J. Urban County Definition

Throughout this report, emphasis is placed on the Urban County rather than on the entirety of Prince George's County. The Urban County of Prince George's County includes all of the geographic area within Prince George's County exclusive of the City of Bowie, which is a HUD CDBG entitlement community in its own right. Units of local government within Prince George's County may choose to participate in the Urban County entitlement program through an "opt-in" process whereby they enter into cooperation agreements with the Urban County.

The Urban County and the City of Bowie have coordinated services to prepare this joint Analysis of Impediments to Fair Housing Choice.

K. Development of the AI

i. Lead Agency

The Prince George's County Human Relations Commission (HRC) was responsible for the preparation and implementation of the AI. Staff from the Commission identified and invited numerous stakeholders to participate in the process for the purpose of developing a thorough analysis with a practical set of recommendations to eliminate impediments to fair housing choice, where identified.

ii. Agency Consultation

The County HRC engaged in an extensive consultation process with local public agencies, nonprofit organizations and other interested entities in an effort to develop a community planning process for the AI. A series of written questionnaires were mailed to many of the interviewees and detailed lists of issues were developed for the focus group sessions and interviews.

From September 2010 to March 2011, the consulting team conducted a series of focus group sessions and individual interviews to identify current fair housing issues impacting the various agencies and organizations. Comments received through these meetings and interviews are incorporated throughout the AI, where appropriate.

A list of the stakeholders identified and invited to the focus group sessions and interviews is included in Appendix A.

L. The Relationship between Fair Housing and Affordable Housing

As stated in the Introduction, fair housing choice is defined as the ability of persons, regardless of race, color, religion, sex, disability, familial status, or national origin, of similar income levels to have available to them the same housing choices. In Maryland, this protection also is extended to persons based on marital status and sexual orientation. Persons who are protected from discrimination by fair housing laws are referred to as members of the protected classes.

This AI analyzes a range of fair housing issues regardless of a person's income. To the extent that members of the protected classes tend to have lower incomes, then access to fair housing is related to affordable housing. In many areas across the U.S., a primary impediment to fair housing is a relative absence of affordable housing. Often, however, the public policies implemented in counties and cities create, or contribute to, the lack of affordable housing in these communities, thereby disproportionately affecting housing choice for members of the protected classes.

This document goes well beyond an analysis of the adequacy of affordable housing in the Urban County and City of Bowie. This AI defines the relative presence of members of the protected classes within the context of factors that influence the ability of the protected classes to achieve equal access to housing and related services.



2. Demographic Information

A. Historical Residential Settlement Patterns

The efforts of residents, community leaders and elected officials in Prince George's County to create diverse and prosperous neighborhoods reflect the context of decades of demographic and economic transition. In 1970, following unprecedented population expansion across the County after World War II, more than half of all Blacks living in Washington-area suburbs lived in Prince George's County.¹ While the County was considered to be less affected by racist attitudes than areas farther south, the U.S. Commission on Civil Rights noted in a 1986 report that racial segregation divided the County's residential space into White neighborhoods and Black neighborhoods, an arrangement advanced by discriminatory practices such as steering, redlining and blockbusting.²

Much of the desegregation history in the County is related to the protracted battle that was fought to integrate its public schools. Nearly 20 years passed between the Supreme Court's landmark 1954 *Brown v. Board of Education* ruling that barred state-sponsored segregation and the Prince George's County Board of Education's adoption of a desegregation plan in 1973 that finally met the standards of federal courts. Prior to *Brown*, the County's schools were entirely segregated, with Black students and teachers using facilities separate from White students and teachers. To respond to the mandate for integration, the school system adopted a "freedom of choice" model, wherein students were automatically assigned to schools they would have attended according to the old system, but they were permitted to request a transfer to a school of their choosing. In addition to putting the burden for change on the parents, "the board seemed to go out of its way to make transferring difficult," which impeded desegregation.³

The County's residential segregation patterns and its school policies were closely linked, as the neighborhood schools concept is not an integration tool if each neighborhood is homogenous. According to the Commission on Civil Rights report previously mentioned, White flight that had originally pushed White families into Prince George's County's central corridor in the 1940s was followed by White flight into outlying, more rural areas during the 1960s, rendering the neighborhood schools plan an ineffective way to integrate.

The U.S. Department of Health, Education and Welfare declared in 1971 that the school's policies and practices were noncompliant with federal guidelines on segregation. In the same year, a group of Black parents sued the school board for noncompliance with the 1964 Civil Rights Act. As a result of the latter, the school system was required to adopt a desegregation plan by which buses would be used to achieve racial balance. A 1973 rally protesting the desegregation drew 15,000 residents.⁴ In 2001, the federal case and the school busing order ended, as courts declared that the "remaining vestiges of segregation" had finally faded.

Today, Prince George's County is the country's most affluent county with a majority Black population. According to analysis by the *Washington Post*, none of the County's segregated neighborhoods – those where more than 85% of residents are a single race or ethnicity – are White, and more than one-third of

¹ Cozzens, Lisa. "Brown v. Board of Education." African American History. <http://fledge.watson.org/~lisa/blackhistory/early-civilrights/brown.html> (25 May 1998).

² U.S. Commission on Civil Rights, *A Long Day's Journey into Light: School Desegregation in Prince George's County* (Washington, DC: GPO, 1986) 193-194.

³ Cozzens

⁴ Cozzens



its Black residents live in neighborhoods that are more than 85% Black.⁵ Three-quarters of neighborhoods with median annual incomes exceeding \$100,000 are majority Black. As the demographic analysis in this report demonstrates, other non-White groups continue to make population inroads. At the same time, the housing market crisis of recent years has profoundly affected Prince George's County, leaving in its wake one of the nation's highest foreclosure rates and a large number of renters and owners in need of assistance in maintaining suitable affordable housing.

B. Demographic Profile

i. Population Trends

The population of Prince George's County has more than doubled since 1960. From a primarily rural community outside of Washington D.C. with 357,395 residents in 1960, the County grew to include 834,986 residents in 2009. The County has retained its rural characteristics, particularly in the southern section, although development and residential suburbs have steadily moved northeast and eastward from the D.C. metro area. Population growth over the past fifty years has been strong, with the rate of growth holding fairly steady in recent decades. Between 1970 and 2000, the annual rate of growth ranged from 85.2% to 0.5%. Since 2000, the County has grown 7.7%.

The Urban County (Prince George's County exclusive of the City of Bowie) has increased 127% since 1960. The rate of growth is slowing in the Urban County as well, and growth since 2000 was 7.6%, which is similar to the County overall.

The City of Bowie has increased in population by nearly 5,000% since 1960, increasing from only 1,072 residents in 1960 to 53,572 in 2009. By 1990, the growth rate was 11.6% when the population was 37,589; a 32.7% increase followed between 1990 and 2000. By 2010, the City had grown to 55,727, an increase of 9.7%.

**Figure 2-1
Population Trends, 1960-2010**

	1960	1970	1980	1990	2000	2010	% Change 1960-2010
Maryland	3,100,689	3,923,897	4,216,975	4,781,468	5,296,486	5,773,552	86.2%
Prince George's County	357,395	661,719	665,071	729,268	801,515	863,420	141.6%
Urban County*	356,323	626,691	631,376	691,679	751,649	808,693	127.0%
Bowie	1,072	35,028	33,695	37,589	49,866	54,727	5005.1%

* The Urban County is Prince George's County exclusive of the City of Bowie.

Source: CensusScope; U.S. Census Bureau; 1990 Census SF3 (P001); Census 2000 SF3 (P1); Census 2010

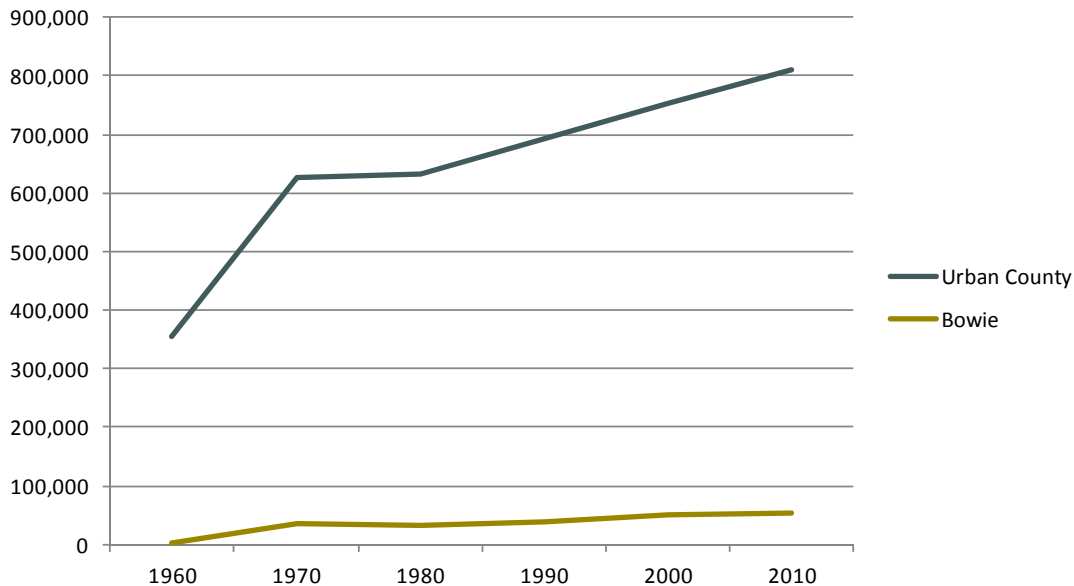
Both the Urban County and the City have experienced significant growth rates between 1960 and 2010.

While the Urban County's population has more than doubled, Bowie's has increased over 5000%.

⁵ Wiggins, Ovetta; Morella, Carol; and Keating, Dan. "Prince George's County: Growing, and growing more segregated, census shows." *Washington Post*, October 30, 2011.



**Figure 2-2
Population Trends, 1960-2010**



In addition to overall population growth, minority residents have increased in number while the White population has shrunk significantly. Between 1990 and 2010, non-White residents increased 61.7% in the Urban County and a dramatic 875.9% in the City of Bowie. During the same period, the White population decreased 48.8% and 33.9%, respectively. As a result, by 2010, Blacks comprised the majority in both the Urban County and Bowie. While this was not as significant of a demographic shift for the Urban County, which was already 50.7% Black in 1990, this marked a dramatic change for the City of Bowie. In 1990, over 90% of the population was White. By 2010, this proportion had shrunk to 41.4%.



**Figure 2-3
Population by Race and Ethnicity, 1990-2010**

	Total Population	White	Non-White Population			Total Minority	Hispanic
			Black	Asian/Pacific Islander	All Other*		
1990							
Prince George's County	729,268	43.1%	50.7%	3.8%	2.4%	56.9%	4.0%
Urban County**	691,679	40.5%	53.1%	3.9%	2.4%	59.5%	4.1%
City of Bowie	37,589	91.3%	5.7%	2.3%	0.7%	8.7%	2.1%
2000							
Prince George's County	801,515	27.0%	62.6%	3.8%	6.6%	73.0%	7.1%
Urban County**	751,649	24.6%	64.7%	3.9%	6.8%	75.4%	7.4%
City of Bowie	49,866	63.2%	30.5%	3.2%	3.2%	36.8%	2.7%
2010							
Prince George's County	863,420	19.2%	64.5%	4.1%	12.2%	80.8%	14.9%
Urban County**	808,693	17.7%	65.5%	4.1%	12.6%	82.3%	15.6%
City of Bowie	54,727	41.4%	48.7%	4.2%	5.7%	58.6%	5.6%
% Change from 1990-2010							
Prince George's County	18.4%	-47.2%	50.6%	27.9%	511.9%	68.2%	345.9%
Urban County**	16.9%	-48.8%	44.2%	23.5%	503.0%	61.7%	347.5%
City of Bowie	45.6%	-33.9%	1141.0%	163.9%	1069.8%	875.9%	288.2%

*Includes: American Indian/Alaska Native, Some other race, Two or more races

** The Urban County is Prince George's County exclusive of the City of Bowie.

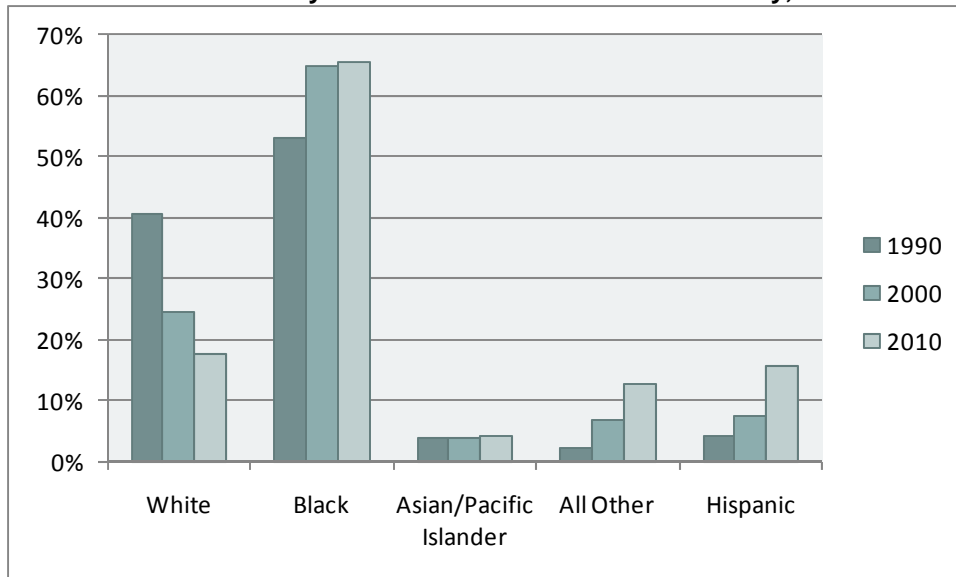
Source: 1990 Census SF3 (P001, P008, P010); Census 2000 SF3 (P1, P6, P7); Census 2010

Among minority residents, diversity is increasing in the Urban County. Whereas Black residents accounted for 89.3% of all minorities in the Urban County in 1990, this rate had fallen to 79.7% in 2010. The opposite trend was noted in Bowie, where Blacks represented 65.3% of the non-White population in 1990 but increased to 83% of all minorities by 2010. The number of Asian/Pacific Islander residents has increased significantly in actual numbers, but decreased as a segment of the minority population. In 1990, Asian/Pacific Islanders accounted for 6.6% of the minority population in the Urban County; this percentage dropped to 5% by 2010. Within Bowie, Asian/Pacific Islanders represented 26.5% of all minorities in 1990, but decreased to 7.2% by 2010.

Hispanic residents have increased in the Urban County, growing from 4.1% of the total population in 1990 to 15.6% in 2010. In numbers, this segment of the population has surged to 125,886 from 28,132. In the City of Bowie, Hispanic residents nearly quadrupled in number from 795 to 3,086, or from 2.1% to 5.6% of the population.

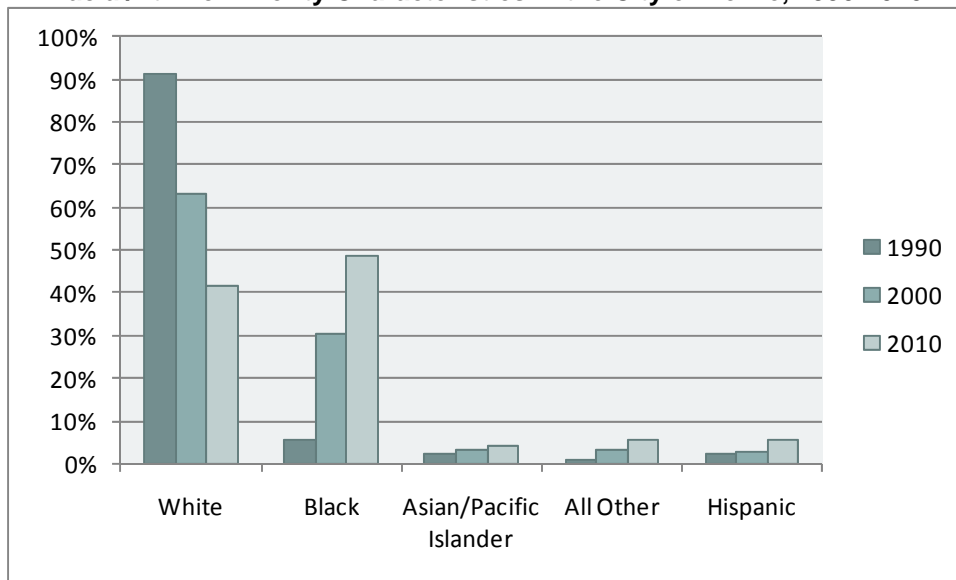


Figure 2-4
Racial/Ethnic Minority Characteristics in the Urban County, 1990-2010



Source: 1990 Census SF3 (P001, P008, P010); Census 2000 SF3 (P1, P6, P7); Census 2010

Figure 2-5
Racial/Ethnic Minority Characteristics in the City of Bowie, 1990-2010



Source: 1990 Census SF3 (P001, P008, P010); Census 2000 SF3 (P1, P6, P7); Census 2010



The City of Bowie and to a lesser extent the Urban County have experienced significant demographic shifts since 1990, from predominantly White to predominantly Black communities.

In 1990, Whites accounted for 40.5% and 91.3%, of the population in the Urban County and City of Bowie, respectively. By 2010, Blacks were the majority group in each jurisdiction, and the White population had decreased to 17.7% and 41.4%, respectively.

Diversity among minorities also increased during this period in the Urban County, as both Asian and Hispanic populations increased significantly.

ii. Areas of Racial and Ethnic Minority Concentration

In its FY2011-FY2015 Consolidated Plan, the Urban County defines an area of racial or ethnic minority concentration as census tracts with more than double the Washington, D.C. regional proportion of each minority group. For example, in 2000 Black residents comprised 26% of all residents in the region, so areas of concentration would include census tracts with more than 52% Black residents. All but 30 of the Urban County's 151 census tracts are areas of concentration of Black residents. (Data tables are included in Appendix B.)

Concentrations of Asian residents would include all census tracts where the percentage of Asians is more than 17.2%. Only three census tracts in the Urban County meet this criterion (8005.04, 8067.08 and 8073.01).

Concentrations of Hispanics would include census tracts where the percentage of Hispanics is above 26%. These areas included 14 census tracts in the Urban County.

There are areas of minority concentration in 150 of the 151 census tracts in the Urban County.

The vast majority of these are concentrations of Black residents (121 census tracts). There are also three tracts of Asian concentration and 14 tracts of Hispanic concentration. In several instances, there are more than one minority concentrations in the same census tract.

In its most recent annual plan (FY2011), the City of Bowie did not define areas of minority concentration. Therefore, for this AI, areas of concentration are defined as geographical areas where the percentage of a specific racial or ethnic group is 10 percentage points higher than the municipality overall. In the City of Bowie, Blacks accounted for 43.9% of the total population in 2009. Therefore, an area of racial concentration of Blacks would include any census tract where

Urban County of Prince George's County and the City of Bowie



the percentage of Black residents is 53.9% or higher. There are six census tracts that meet this criterion. These census tracts are highlighted in Figure 12-2 in Appendix B. There were no other areas of minority concentration in the City.

There are six areas of concentration of Black residents in the City of Bowie.

These include census tracts 8004.06, 8005.07, 8005.08, 8005.09, 8005.11, and 8005.12.

Areas of minority concentration in the Urban County and Bowie are illustrated geographically on Map 1 on the follow page. Concentrations of Black residents dominate all but the far northern and southern tips of the County, as indicated in green. In Bowie, areas of concentration of Black residents are located in the far northern section and southern third of the City. The areas of concentration of Hispanic (shown in gold) and Asian residents (shown in blue) are situated primarily in the northern communities surrounding Hyattsville and within inner Beltway communities bordering Washington, D.C. There are no areas of concentration of Hispanics or Asians in Bowie.

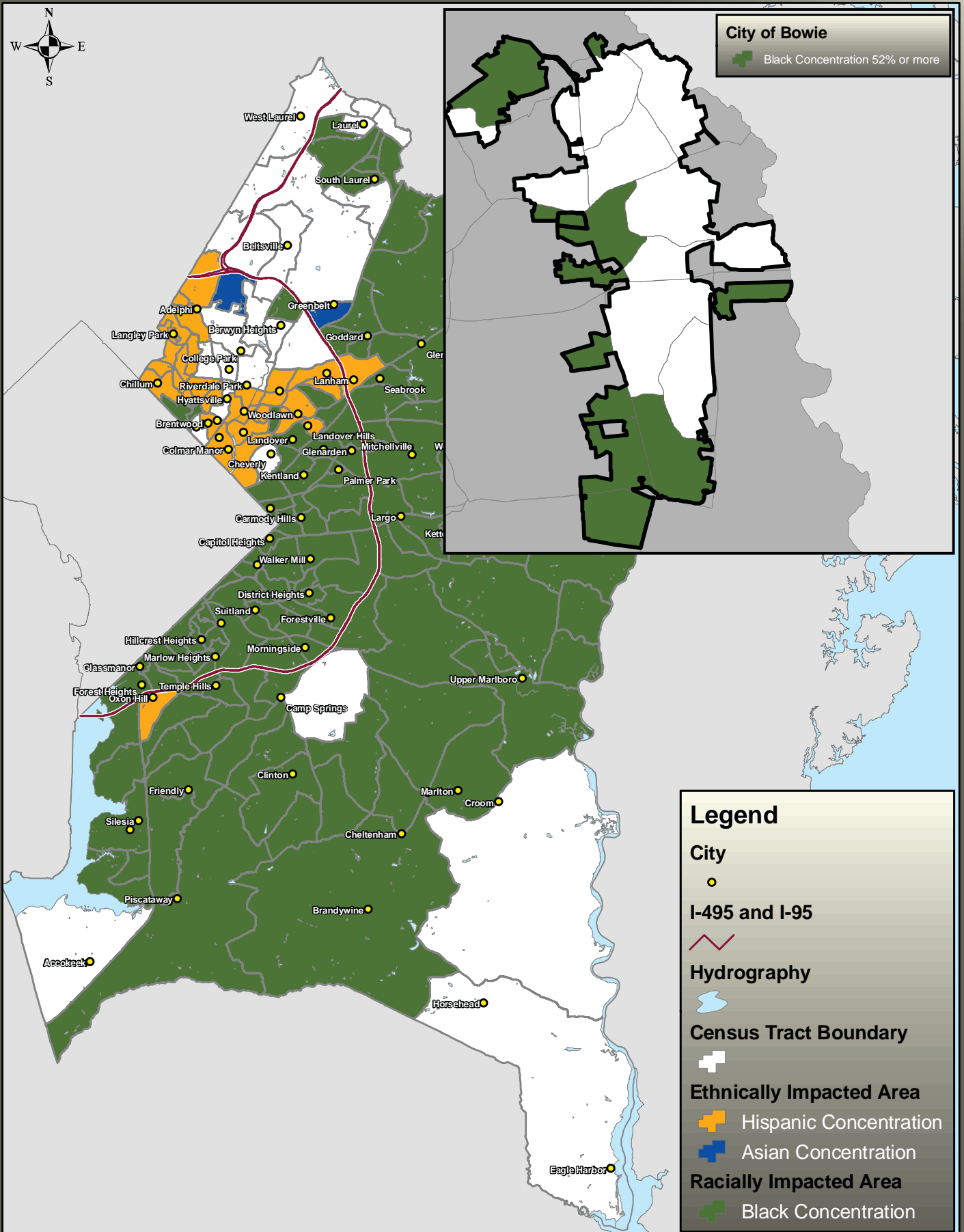
iii. Residential Segregation Patterns

Residential segregation is a measure of the degree of separation of racial or ethnic groups living in a neighborhood or community. Typically, the pattern of residential segregation involves the existence of predominantly homogenous, White suburban communities and lower income minority inner-city neighborhoods. A potential impediment to fair housing is created where either latent factors, such as attitudes, or overt factors, such as real estate practices, limit the range of housing opportunities for minorities. A lack of racial or ethnic integration in a community creates other problems, such as reinforcing prejudicial attitudes and behaviors, narrowing opportunities for interaction, and reducing the degree to which community life is considered harmonious. Areas of extreme minority isolation often experience poverty and social problems at rates that are disproportionately high. Racial segregation has been linked to diminished employment prospects, poor educational attainment, increased infant, and adult mortality rates and increased homicide rates.

The distribution of racial or ethnic groups across a geographic area can be analyzed using an index of dissimilarity. This method allows for comparisons between subpopulations, indicating how much one group is spatially separated from another within a community. The index of dissimilarity is rated on a scale from 0 to 100, in which a score of 0 corresponds to perfect integration and a score of 100 represents total segregation.⁶ The index is typically interpreted as the percentage of a specific racial or ethnic population that would have to move in order for a community or neighborhood to achieve full integration. A dissimilarity index of less than 30 indicates a low degree of segregation, while values between 30 and 60 indicate moderate segregation, and values above 60 indicate high segregation.

⁶ The index of dissimilarity is a commonly used demographic tool for measuring inequality. For a given geographic area, the index is equal to $1/2 \sum \text{ABS} [(b/B)-(a/A)]$, where **b** is the subgroup population of a census tract, **B** is the total subgroup population in a city, **a** is the majority population of a census tract, and **A** is the total majority population in the city. **ABS** refers to the absolute value of the calculation that follows.





The dissimilarity index for Whites/Blacks in Prince George's County was 52.2 in 2000, as illustrated in Figure 2-6. This is indicative of a moderately segregated jurisdiction between Blacks and Whites. The data indicate that in order to achieve full integration, 52.2% of White residents would have to move to a different location within Prince George's County.

Dissimilarity indices in the following chart show that, in addition to a Black/White index of 52.2, Prince George's County had a Hispanic/White index of 57.1 in 2000. In cases where subgroup population is small, the dissimilarity index may be high even if the group's members are evenly dispersed.

On a comparative basis, Prince George's County ranked as one of the more segregated counties in Maryland with a moderate dissimilarity index of 52.2. This is evident in Map 1 where one can observe the predominantly non-Black census tracts are clustered in the far northern end and the southern tip of the County, with only a couple of additional areas (Camp Springs and Accokeek) identified as areas of concentration of non-Black residents.

To place the dissimilarity indices for the County in context, Figure 2-6 also lists the dissimilarity indices for counties and larger cities in Maryland in 2000, the most recent year for which data was available at the county level. Compared to other counties in Maryland, Prince George's County is one of the more segregated counties.



**Figure 2-6
Maryland Dissimilarity Index Rankings, 2000**

Rank	Area	Minority Population	White Population	Total Population	Dissimilarity Index*
<i>Black Population</i>					
1	Caroline County	4,368	24,029	29,772	17.2
2	Kent County	3,317	15,050	19,197	17.5
3	Charles County	31,203	81,111	120,546	20.4
4	Calvert County	9,728	61,894	74,563	20.9
5	Garrett County	127	29,378	29,846	24.7
6	Queen Anne's County	3,537	35,863	40,563	30.9
7	Talbot County	5,161	27,456	33,812	30.9
8	Carroll County	3,400	143,455	150,897	31.8
9	St. Mary's County	11,908	69,336	86,211	33.2
10	Howard County	35,353	180,010	247,842	35.8
11	Cecil County	3,321	79,546	85,951	38.5
12	Somerset County	10,108	13,814	24,747	39.9
13	Wicomico County	19,583	60,552	84,644	40.0
14	Montgomery County	129,371	519,318	873,341	43.8
15	Frederick County	12,253	171,966	195,277	44.2
16	Dorchester County	8,658	21,117	30,674	46.0
17	Anne Arundel County	65,755	390,519	489,656	47.9
18	Harford County	20,007	187,548	218,590	49.1
19	Allegany County	3,962	69,340	74,930	51.6
20	Prince George's County	498,301	194,836	801,515	52.2
21	Worcester County	7,699	37,435	46,543	53.6
22	Washington, DC MSA	926,584	2,603,063	4,351,094	57.5
23	Washington, DC	10,150	117,518	131,923	61.8
24	Baltimore County	150,456	553,890	754,292	65.0
25	Baltimore City	417,009	201,566	651,154	71.5
<i>Hispanic Population</i>					
1	Garrett County	131	29,378	29,846	10.5
2	Calvert County	1,135	61,894	74,563	15.4
3	Queen Anne's County	444	35,863	40,563	17.4
4	Carroll County	1,489	143,455	150,897	18.8
5	Dorchester County	385	21,117	30,674	19.0
6	Worcester County	596	37,435	46,543	22.9
7	Washington, DC	1,570	117,518	131,923	23.5
8	Charles County	604	81,111	120,546	24.2
9	Cecil County	1,306	79,546	85,951	25.4
10	Somerset County	334	13,814	24,747	26.2
11	Howard County	7,490	180,010	247,842	28.6
12	St. Mary's County	1,720	69,336	86,211	29.5
13	Kent County	546	15,050	19,197	31.2
14	Wicomico County	1,842	60,552	84,644	32.4
15	Harford County	4,169	187,548	218,590	32.6
16	Baltimore County	13,774	553,890	754,292	32.9
17	Frederick County	4,664	171,966	195,277	32.9
18	Allegany County	571	69,340	74,930	33.7
19	Anne Arundel County	12,902	390,519	489,656	34.6
20	Baltimore City	11,061	201,566	651,154	37.2
21	Talbot County	615	27,456	33,812	41.3
22	Montgomery County	100,604	519,318	873,341	42.0
23	Washington, DC MSA	387,050	2,603,063	4,351,094	47.1
24	Caroline County	789	24,029	29,772	48.5
25	Prince George's County	57,057	194,836	801,515	57.1

* Represents dissimilarity index with White population

Source: University of Michigan Racial Residential Segregation Measurement Project



For the purpose of this report, the dissimilarity index for 2010 was calculated. In the County, the Black/White index fell slightly to 51.0. More than likely, this trend occurred as a result of a decrease in the White population (-28,777) and an increase in the Black population (58,319).

**Figure 2-7
Dissimilarity Indices for Prince George’s County, 2010**

	DI with Black Population*	Population	% of Total Population
Black	-	556,620	64.5%
White	51.0	166,059	19.2%
American Indian/Alaska Native	39.9	4,258	0.5%
Asian	49.4	35,172	4.1%
Pacific Islander**	55.1	541	0.1%
Other	57.2	73,441	8.5%
Two or more races	29.5	27,329	3.2%
Hispanic***	53.6	128,972	14.9%
Total	-	863,420	100%

* Each dissimilarity index indicates the percentage of either group that would have to move to different census tracts to create an even distribution across the County.

** In this case, sample size is too small to reliably interpret the DI. Caution should be exercised in interpreting results for subpopulations of fewer than 1,000.

*** For the purposes of the dissimilarity calculations, Hispanic ethnicity is counted as a racial group.

Source: Census 2010 (SF-1 QT-P3), Calculations by Mullin & Lonergan Associates

The dissimilarity index for Whites/Blacks in the City of Bowie was 49.2 in 2000, as illustrated in Figure 2-8. This is also indicative of a moderately segregated municipality, although slightly lower than Prince George’s County overall. The data indicate that in order to achieve full integration, 49.2% of White residents would have to move to a different location within Bowie.

Dissimilarity indices in the following chart show that, in addition to a Black/White index of 49.2, Bowie has an Asian/White index of 35.0, and a Hispanic/White index of 20.3. These numbers indicate that Asians are slightly less segregated than Blacks, while Hispanics are the most integrated. Indices for the other groups cannot be as reliably interpreted since their populations are less than 1,000.



**Figure 2-8
Dissimilarity Indices for Bowie, 2000**

	DI with White Population*	Population	% of Total Population
White	-	30,709	61.1%
Black	49.2	15,339	30.5%
American Indian/Native Alaskan**	36.0	143	0.3%
Asian	35.0	1,466	2.9%
Native Hawaiian**	84.1	15	0.0%
Other**	27.4	116	0.2%
Two or more races	23.9	1,013	2.0%
Hispanic***	20.3	1,468	2.9%
Total	-	50,269	100%

* Each dissimilarity index indicates the percentage of that cohort group which would have to move to different geographic locations (i.e., block groups) to create an even distribution in the City.

** In these cases, sample size is too small to reliably interpret the DI. Caution should be exercised in interpreting results for subpopulations of fewer than 1,000.

*** For the purposes of the dissimilarity calculations, Hispanic ethnicity is counted as a racial group.

Source: *CensusScope Dissimilarity Indices*

Figure 2-9 lists the dissimilarity indices for cities in Maryland with populations above 20,000. Bowie's Black/White index is higher, comparatively, but it has the lowest Hispanic/White index in the State.

By 2010, the dissimilarity index in Bowie for Blacks/Whites had fallen to 41.6 as a result of a loss of White residents (-8,050) and an increase among Black residents (11,293), as indicated in Figure 2-10.



Figure 2-9
Maryland City Dissimilarity Index Rankings, 2000

Rank	Municipality	Minority Population	White Population	Total Population	Dissimilarity Index*
Black Population					
1	Frederick	7,641	39,568	42,767	32.3
2	Hagerstown	3,661	31,244	36,687	34.9
3	Gaithersburg	7,457	25,818	52,613	39.6
4	Rockville	4,200	29,342	47,388	43.6
5	Bowie	15,339	30,709	50,269	49.2
6	Annapolis	11,205	21,137	35,838	56.2
7	Baltimore	417,009	201,566	651,154	75.2
Hispanic Population					
1	Bowie	1,468	30,709	50,269	20.3
2	Hagerstown	649	31,244	36,687	33.6
3	Rockville	5,529	29,342	47,388	36.6
4	Frederick	2,533	39,568	42,767	36.8
5	Baltimore	11,061	201,566	651,154	43.9
6	Gaithersburg	10,398	25,818	52,613	49.9
7	Annapolis	2,301	21,137	35,838	56.3

* Represents dissimilarity index with White population

Source: CensusScope Dissimilarity Indices

Figure 2-10
Dissimilarity Indices for Bowie, 2010

	DI with Black Population*	Population	% of Total Population
Black	-	26,632	48.7%
White	41.6	22,659	41.4%
American Indian/Native Alaskan**	29.6	144	0.3%
Asian	21.9	2,265	4.1%
Pacific Islander**	57.7	36	0.1%
Other**	31.8	1,045	1.9%
Two or more races	24.7	1,946	3.6%
Hispanic***	28.0	3,086	5.6%
Total	-	54,727	100%

* Each dissimilarity index indicates the percentage of either group that would have to move to different census tracts to create an even distribution across the County.

** In these cases, sample size is too small to reliably interpret the DI. Caution should be exercised in interpreting results for subpopulations of fewer than 1,000.

*** For the purposes of the dissimilarity calculations, Hispanic ethnicity is counted as a racial group.

Source: Census 2010 (SF-1 QT-P3), Calculations by Mullin & Lonergan Associates



Prince George’s County and the City of Bowie are moderately segregated, with respective dissimilarity indices of 51.0 and 41.6 for Blacks/Whites.

This represents a decrease in both areas from the 2000 dissimilarity index, resulting from an increase in Black residents and a decline in the number of White residents.

iv. Race/Ethnicity and Income

Household income is one of several factors used to determine a household’s eligibility for a home mortgage loan. In Prince George’s County, the median household income for Whites and Asians was slightly higher than for Blacks and Hispanics. The median household income for Black households was \$70,294, equivalent to 93% of the median income for White households and 92% of that for Asian households. Hispanic households fared worse than Black households with a median income of only \$58,455. This was equivalent to 78% of the median income for White households and 77% that of Asian households.

As shown in Figure 2-11, the poverty rate among Blacks was less than the rate for Whites in Prince George’s County, despite having a lower median income. Poverty was highest among Hispanics and lowest among Asians.

Income levels in the City of Bowie were higher overall, although income trends had some noticeable differences from those in the County. Asians had the highest median income at \$113,224, followed by Blacks at \$104,089. Blacks and Hispanics residing in the City were significantly wealthier than their counterparts in the rest of the County. Poverty rates were lower in the City, with Blacks and Hispanics less likely to be living in poverty than those living elsewhere in Prince George’s County.

**Figure 2-11
Median Household Income and Poverty Rates by Race/Ethnicity, 2009**

	Median Household Income	Poverty Rate
Prince George's County	\$70,753	7.4%
Whites	\$75,356	7.3%
Blacks	\$70,294	7.1%
Asians	\$76,146	5.9%
Hispanics	\$58,455	10.5%
City of Bowie	\$99,883	2.9%
Whites	\$95,490	2.5%
Blacks	\$104,089	3.2%
Asians	\$113,224	0.5%
Hispanics	\$93,882	1.5%

Source: 2005-2009 American Community Survey (B19013, B19013A, B19013B, B19013D, B19013I & B17001, B17001A, B17001B, B17001D, B17001I)



Compared to the rest of the country, Prince George’s County is a relatively affluent area with a high median household income. However, in comparison to neighboring counties, Prince George’s County has the lowest median household income and the highest poverty rate. Median household incomes elsewhere in the region range from \$81,824 in Anne Arundel County to \$101,003 in Howard County.

**Figure 2-12
Median Household Income and Poverty Rates in Surrounding Counties, 2009**

	Median Household Income	Poverty Rate
Prince George's County	\$70,753	7.4%
Anne Arundel County	\$81,824	5.2%
Calvert County	\$90,621	4.8%
Charles County	\$86,141	5.4%
Howard County	\$101,003	4.0%
Montgomery County	\$92,213	5.3%

Source: 2005-2009 American Community Survey (B19013, B17001)

Despite being a relatively affluent community, median household incomes in Prince George’s County remained significantly lower than those in the surrounding five counties.

Prince George’s County also had the highest poverty rate among the surrounding counties.

A review of household income distribution among White, Black, and Hispanic households also shows similar trends. In the Urban County, 13.1% of White households earned less than \$25,000 compared to 12.0% of Black households and 12.4% of Hispanic households. At the opposite end of the spectrum, just under half of all White households (47.3%) earned more than \$75,000 compared to 45.5% of Black households. Among Hispanic households, 33.8% were in the highest income bracket.

In Bowie, Black households were generally less likely to fall into the lower income brackets (less than \$50,000 household income) than Whites, Asians, and Hispanics, as illustrated in Figure 2-13. Only 4.4% of Black households earned less than \$25,000 compared to 5.7% of Asians, 6.2% of Whites and 8.1% of Hispanics. At the upper end of the spectrum, 71.3% of Black and 74.3% of Asian households earned \$75,000 or more, compared to 68.5% of White households and 61.2% of Hispanic households.



Figure 2-13
Household Income Distribution by Race, 2009

	Total	\$0 to \$24,999		\$25,000 to \$49,999		\$50,000 to \$74,999		\$75,000 and higher	
		#	%	#	%	#	%	#	%
Prince George's County									
All Households	297,937	34,948	11.7%	61,264	20.6%	61,970	20.8%	139,755	46.9%
White Households	72,862	8,822	12.1%	13,742	18.9%	13,692	18.8%	36,606	50.2%
Black Households	197,029	22,949	11.6%	40,503	20.6%	41,895	21.3%	91,682	46.5%
Asian Households	9,978	897	9.0%	1,923	19.3%	2,059	20.6%	5,099	51.1%
Hispanic Households	23,348	2,864	12.3%	6,428	27.5%	5,973	25.6%	8,083	34.6%
Urban County*									
All Households	278,515	33,916	12.2%	59,279	21.3%	59,145	21.2%	126,175	45.3%
White Households	62,698	8,191	13.1%	12,557	20.0%	12,306	19.6%	29,644	47.3%
Black Households	188,951	22,597	12.0%	39,818	21.1%	40,611	21.5%	85,925	45.5%
Asian Households	9,437	866	9.2%	1,859	19.7%	2,015	21.4%	4,697	49.8%
Hispanic Households	22,619	2,805	12.4%	6,301	27.9%	5,876	26.0%	7,637	33.8%
City of Bowie									
All Households	19,422	1,032	5.3%	1,985	10.2%	2,825	14.5%	13,580	69.9%
White Households	10,164	631	6.2%	1,185	11.7%	1,386	13.6%	6,962	68.5%
Black Households	8,078	352	4.4%	685	8.5%	1,284	15.9%	5,757	71.3%
Asian Households	541	31	5.7%	64	11.8%	44	8.1%	402	74.3%
Hispanic Households	729	59	8.1%	127	17.4%	97	13.3%	446	61.2%

* The Urban County is Prince George's County exclusive of the City of Bowie.

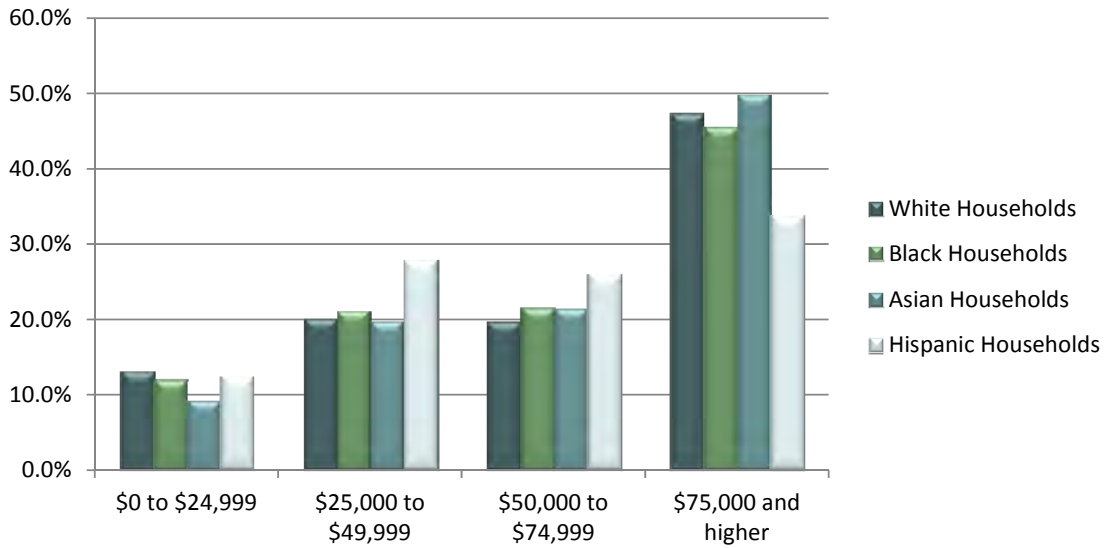
Source: 2005-2009 American Community Survey (C19001, C19001A, C19001B, C19001D, C19001I)

Black households and Hispanic households were less likely to have lower incomes (less than \$25,000) in the City of Bowie than elsewhere in Prince George's County.

This reflects median household income trends, which show that median incomes for minorities in Bowie are higher than those in the County.

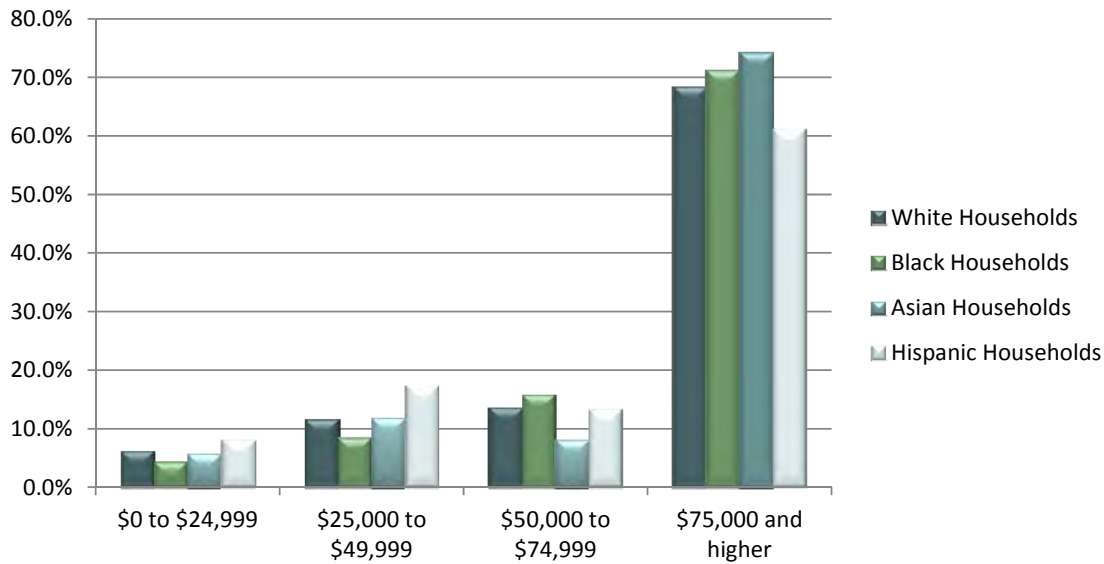


Figure 2-14
Household Income Distribution by Race in the Urban County, 2009



Source: 2005-2009 American Community Survey (C19001, C19001A, C19001B, C19001D, C19001I)

Figure 2-15
Household Income Distribution by Race in Bowie, 2009



Source: 2005-2009 American Community Survey (C19001, C19001A, C19001B, C19001D, C19001I)



v. Concentrations of LMI Persons

The CDBG Program includes a statutory requirement that at least 70% of the funds invested benefit low and moderate income (LMI) persons. As a result, HUD provides the percentage of LMI persons in each census block group for entitlements such as the Urban County and the City of Bowie.

HUD data reveals that there are 60 census tracts in the Urban County where at least 51.0% of residents (for whom this rate is determined) meet the criterion for LMI status, as listed in Figure 12-3 in Appendix B. Map 2 on the following page illustrates all areas of LMI concentration (shown as cross-hatched areas) in the Urban County and the City of Bowie. Of these 60 LMI census tracts, all but 6 are also areas of concentration of minorities.

In the City of Bowie, there are six census tracts where at least 20.61% of residents (for whom this rate is determined) meet the criterion for LMI status.⁷ These are highlighted in Figure 12-4 in Appendix B. Two of these LMI census tracts are located within the previously identified areas of concentration of Black residents located in the far northern area of the City.

In the Urban County, the LMI census tracts are primarily found closest to the boundary with Washington, DC. In both the Urban County and in Bowie, areas identified as concentrations of both minorities and LMI persons are referred to as impacted areas. These are illustrated on Map 3.

There are 54 impacted areas in the Urban County and two in the City of Bowie, all of which include concentrations of both LMI persons and minorities.

In the Urban County, 54 of the 60 census tracts identified as concentrations of LMI persons were also areas of minority concentration. Consequently, in the Urban County, areas of minority concentration are significantly more likely also to be areas of concentration of LMI persons. In the City of Bowie, only two areas of minority concentration were also areas of LMI persons.

With only two exceptions, all of the impacted areas in Prince George's County are located within the Capital Beltway. The exceptions are the two census tracts in Bowie and two census tracts near Laurel in the northern area of the County. It is within these impacted areas that the housing, income and other characteristics will be analyzed in the AI.

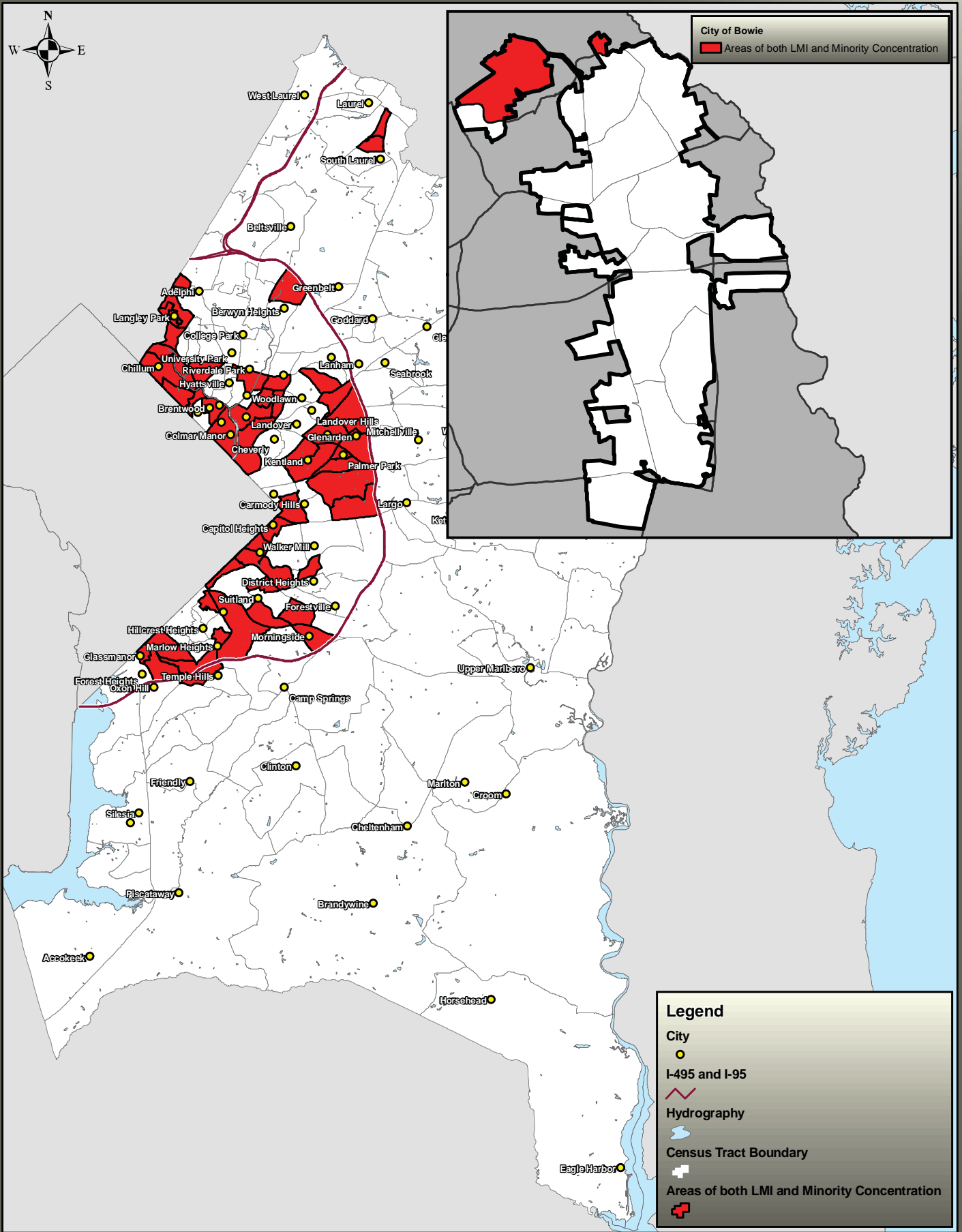
vi. Disability and Income

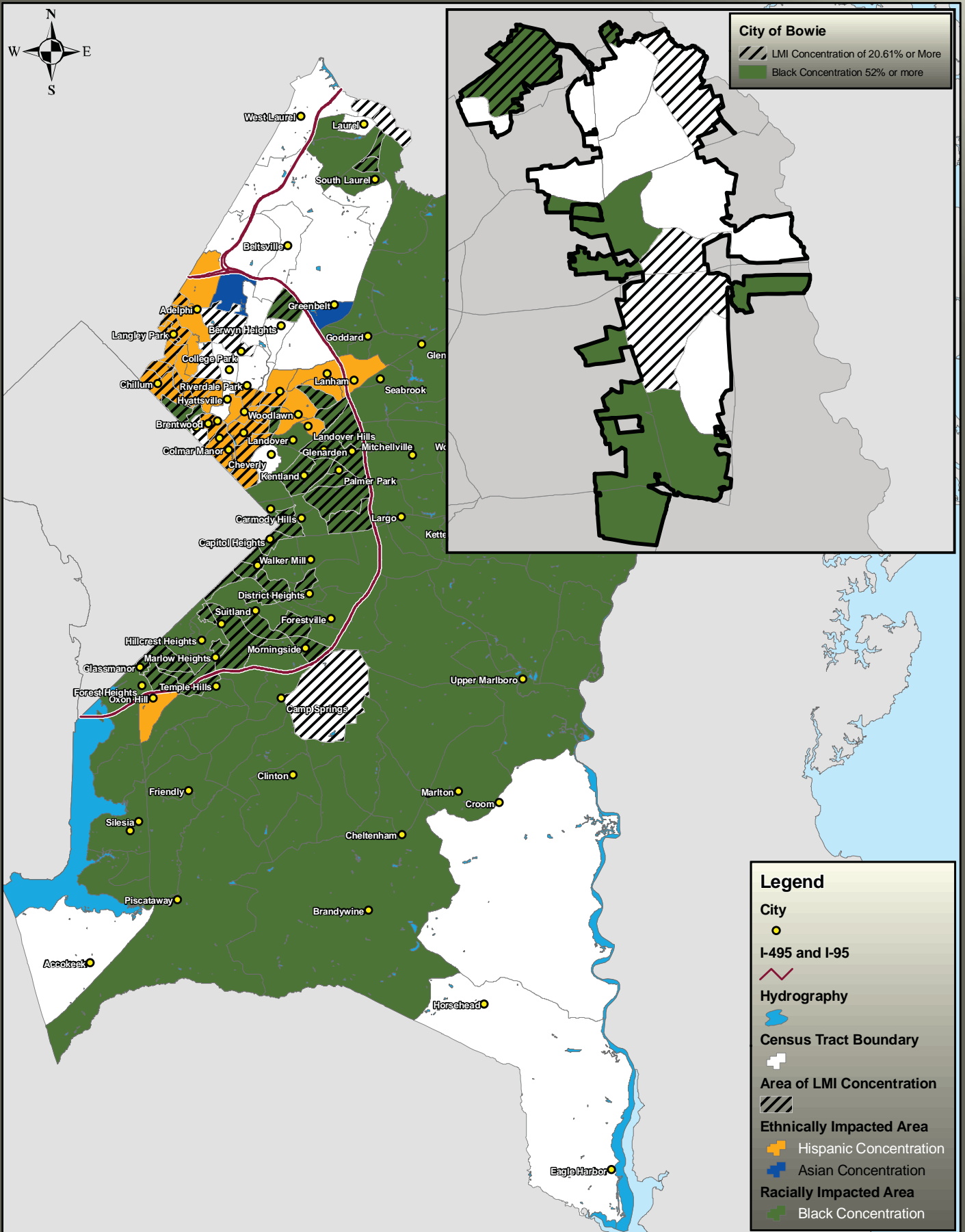
The Census Bureau reports disability status for non-institutionalized disabled persons age 5 and over. As defined by the Census Bureau, a disability is a long-lasting physical, mental, or emotional condition that can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business.

⁷ The 20.61% threshold is determined by HUD and represents the upper quartile of census block groups having the highest concentration of low and moderate income persons in the City.



**Prince George's County and the City of Bowie, MD
Analysis of Impediments to Fair Housing Choice**





The Fair Housing Act prohibits discrimination based on physical, mental, or emotional handicap, provided “reasonable accommodation” can be made. Reasonable accommodation may include changes to address the needs of disabled persons, including adaptive structural (e.g., constructing an entrance ramp) or administrative changes (e.g., permitting the use of a service animal). In Prince George’s County, 7.9% of the population 5 years and older reported at least one disability in 2009. In 2000 (the latest year for which data was available for smaller municipalities) the rate in Bowie was higher, with 13.5% of residents reporting at least one disability.⁸

According to the National Organization on Disabilities, a significant income gap exists for persons with disabilities, given their lower rate of employment. In Prince George’s County, among all persons with a disability in 2009, 12.8% were living below the poverty. Among persons without a disability, only 7.1% were living below the level of poverty. In the City of Bowie, among all persons with a disability, 3.2% were living in poverty compared to 1.5% of persons without a disability who were living in poverty.⁹

Persons with disabilities were more likely to live in poverty than persons without disabilities.

In Prince George’s County, 12.8% of persons with a disability were living in poverty compared to 7.1% of persons without a disability. In Bowie, 3.2% of persons with a disability were living in poverty compared to 1.5% of persons without a disability.

vii. Familial Status and Income

The Census Bureau divides households into family and non-family households. Family households are married couple families with or without children, single-parent families, and other families made up of related persons. Non-family households are either single persons living alone, or two or more non-related persons living together.

Title VIII of the Civil Rights Act of 1968 protects against gender discrimination in housing. Protection for families with children was added in the 1988 amendments to Title VIII. Except in limited circumstances involving elderly housing and owner-occupied buildings of one to four units, it is unlawful to refuse to rent or sell to families with children.

In the Urban County, the proportion of female-headed households increased from 16.7% in 1990 to 19.5% in 2009, and female-headed households with children increased from 8.9% to 10.7%. By comparison, married-couple family households with children declined from 24.4% to 18.4% of all households. There was a slight increase in the rate of male-headed households with children from 1.9% to 2.7%.

In the City of Bowie, the trends were very similar with female-headed households increasing from 8.1% to 11.9% between 1990 and 2009. Female-headed households with children also increased, rising from 3.8% to 6.9% over the same period. The decline in married-couple family

⁸ U.S. Census Bureau, Census 2000, SF3 (P42)

⁹ U.S. Census Bureau, Census 2000, SF3 (PCT34)



households with children was more pronounced than in the Urban County, declining from 32.8% to 25.1%. The percentage of male-headed households with children also rose slightly from 1.0% in 1990 to 1.9% in 2009.

Female-headed households with children often experience difficulty in obtaining housing, primarily as a result of lower. In the Urban County in 2000, female-headed households with children accounted for 52.3% of families living below the level of poverty compared to only 18.6% of families who were living above the level of poverty. In Bowie, female-headed households with children accounted for 57.4% of families living below the level of poverty compared to only 8.7% of families who were living above the level of poverty, although the sample size of families below poverty level is fairly small.

Figure 2-16
Households by Type and Presence of Children, 1990-2009

	Total Households	% of Total	Family Households									Non-Family and 1-Person Households
			Married-Couple families			Female-Headed Households			Male-Headed Households			
			% of Total	With Children	Without Children	% of Total	With Children	Without Children	% of Total	With Children	Without Children	
1990												
Prince George's County	257,689	71.3%	50.5%	24.8%	25.7%	16.3%	8.6%	7.6%	4.6%	1.9%	2.7%	28.7%
Urban County*	244,733	70.8%	49.4%	24.4%	25.0%	16.7%	8.9%	7.8%	4.7%	1.9%	2.8%	29.2%
City of Bowie	12,956	82.1%	71.3%	32.8%	38.5%	8.1%	3.8%	4.3%	2.7%	1.0%	1.8%	17.9%
2000												
Prince George's County	286,650	69.6%	44.9%	22.1%	22.8%	19.2%	11.4%	7.9%	5.5%	2.6%	2.9%	30.4%
Urban County*	268,495	69.3%	43.8%	21.5%	22.2%	19.8%	11.8%	8.1%	5.7%	2.7%	3.0%	30.7%
City of Bowie	18,155	74.4%	61.4%	30.5%	30.9%	10.5%	5.5%	5.0%	2.6%	1.7%	0.9%	25.6%
2009												
Prince George's County	297,937	66.0%	40.8%	18.8%	22.0%	19.0%	10.4%	8.6%	6.1%	2.7%	3.4%	34.0%
Urban County*	278,515	65.7%	39.9%	18.4%	21.5%	19.5%	10.7%	8.9%	6.3%	2.7%	3.6%	34.3%
City of Bowie	19,422	69.7%	54.0%	25.1%	28.9%	11.9%	6.9%	5.1%	3.7%	1.9%	1.9%	30.3%

* The Urban County is Prince George's County exclusive of the City of Bowie.

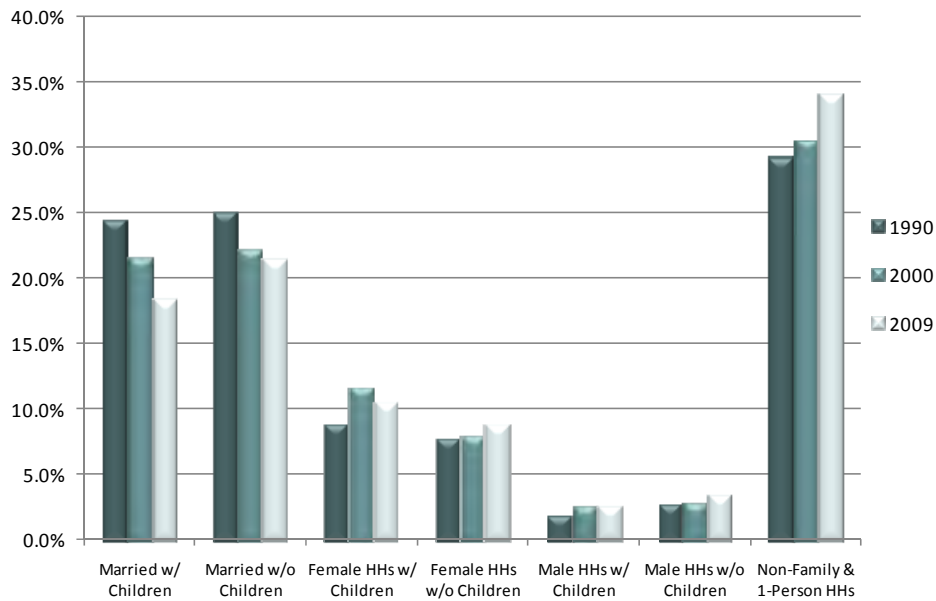
Sources: U.S. Census Bureau, 1990 Census SF3 (P019); Census 2000 SF3 (P10); 2009 American Community Survey (B11001, B11003)

Female-headed households with children accounted for more than half of all families living below the level of poverty in the Urban County and the City of Bowie.

In the Urban County in 2000, female-headed households with children accounted for 52.3% of families living below the level of poverty and in Bowie, female-headed households with children accounted for 57.4% of families living in poverty.

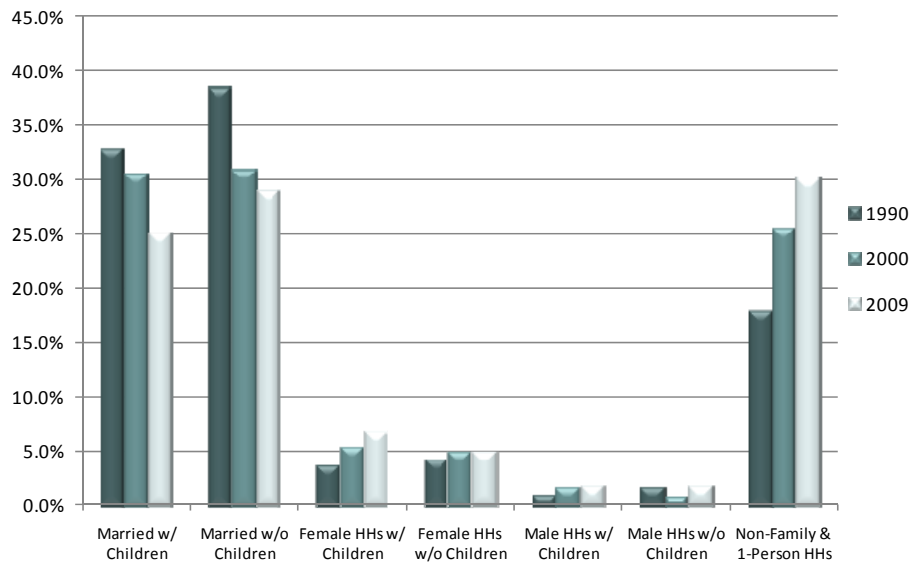


Figure 2-17
Households by Type and Presence of Children in the Urban County, 1990-2009



Sources: U.S. Census Bureau, 1990 Census SF3 (P019); Census 2000 SF3 (P10); 2009 American Community Survey (B11001, B11003)

Figure 2-18
Households by Type and Presence of Children in Bowie, 1990-2009



Sources: U.S. Census Bureau, 1990 Census SF3 (P019); Census 2000 SF3 (P10); 2009 American Community Survey (B11001, B11003)



viii. Ancestry, Persons with LEP and Poverty

It is illegal to refuse the right to housing based on place of birth or ancestry. Census data on native and foreign-born populations revealed 20.1% of the Urban County's residents and 14.5% of City residents in 2009 were foreign-born or born outside of the U.S. in Puerto Rico or on U.S. island areas.¹⁰

Among families with children with foreign-born parents residing in the Urban County, 33.2% were living under 200% of the poverty level compared to 66.8% who were living above 200% of the poverty level. In the City of Bowie, 23.7% were living under 200% of the poverty level compared to 76.3% who were living above 200% of the poverty level.¹¹

Persons with limited English proficiency (LEP) are defined as persons who have a limited ability to read, write, speak or understand English. HUD uses the prevalence of persons with LEP to identify the potential for impediments to fair housing choice due to their inability to comprehend English. Persons with LEP may encounter obstacles to fair housing by virtue of language and cultural barriers within their new environment. To assist these individuals, it is important that a community recognizes their presence and the potential for discrimination, whether intentional or inadvertent, and establishes policies to eliminate barriers. It is also incumbent upon HUD entitlement communities to determine the need for language assistance and comply with Title VI of the Civil Rights Act of 1964.

American Community Survey (ACS) data reports on the non-English language spoken at home for the population five years and older. In Prince George's County, there were 61,308 persons who spoke English less than "very well" in 2009. Of these, 67% were native Spanish speakers.

Figure 2-19
Language Spoken at Home in Prince George's County, 2009

Language Group	Number of LEP Persons	% of Total Population
Spanish	41,080	5.32%
African languages	3,937	0.51%
French	2,356	0.31%
Chinese	2,228	0.29%
Vietnamese	1,820	0.24%
Tagalog	1,559	0.21%
Korean	1,310	0.17%

Source: 2007-2009 American Community Survey Three-Year Estimates (B16001)

To determine whether translation of vital documents is required, a HUD entitlement community must first identify the number of LEP persons in a single language group who are likely to qualify for and be served by the Urban County's programs. In Prince George's County, Census data revealed there are potentially six individual languages with significant numbers (i.e., more than 1,000) of native speakers who also speak English less than "very well." The individual languages include Spanish, French, Chinese, Vietnamese, Tagalog, and Korean. Given the large number of

¹⁰ U.S. Census Bureau, 2005-2009 American Community Survey (B05002)

¹¹ U.S. Census Bureau, 2005-2009 American Community Survey (C05010)



persons with LEP, the Urban County has adopted a Language Access Plan (LAP) to ensure access to vital services.

In the City of Bowie, there were 1,491 persons with LEP in 2009. No language group exceeded 1,000 native speakers with LEP.

ix. Protected Class Status and Unemployment

Unemployment in Prince George's County in 2009 was 7.5%, which was higher than Maryland's rate of 6.0%. Unemployment rates tended to be significantly lower in the City than in the Urban County, particularly among females, where it was 3.1% in Bowie compared to 7.1% in the Urban County, and Hispanics, where it was 4.5% in Bowie compared to 8.9% in the Urban County. In the whole of Prince George's County, unemployment was higher among Blacks (8.1%) and Hispanics (8.8%), but lower among Asians (5.3%).

Higher unemployment, whether temporary or permanent, will mean less disposable income for housing expenses.

**Figure 2-20
Civilian Labor Force, 2009**

	Maryland		Prince George's County		Urban County*		City of Bowie	
	Total	%	Total	%	Total	%	Total	%
Total CLF	3,049,380		474,100		444,307		29,793	
Employed	2,866,430	94.0%	438,762	92.5%	410,273	92.3%	28,489	95.6%
Unemployed	182,950	6.0%	35,338	7.5%	34,034	7.7%	1,304	4.4%
Male CLF	1,555,807		233,987		219,165		14,822	
Employed	1,458,699	93.8%	215,186	92.0%	201,206	91.8%	13,980	94.3%
Unemployed	97,108	6.2%	18,801	8.0%	17,959	8.2%	842	5.7%
Female CLF	1,493,573		240,113		225,142		14,971	
Employed	1,407,731	94.3%	223,576	93.1%	209,067	92.9%	14,509	96.9%
Unemployed	85,842	5.7%	16,537	6.9%	16,075	7.1%	462	3.1%
White CLF	1,882,039		105,747		91,587		14,160	
Employed	1,800,140	95.6%	99,978	94.5%	86,328	94.3%	13,650	96.4%
Unemployed	81,899	4.4%	5,769	5.5%	5,259	5.7%	510	3.6%
Black CLF	867,257		310,656		297,204		13,452	
Employed	784,585	90.5%	285,360	91.9%	272,657	91.7%	12,703	94.4%
Unemployed	82,672	9.5%	25,296	8.1%	24,547	8.3%	749	5.6%
Asian CLF	154,389		18,419		17,257		1,162	
Employed	147,592	95.6%	17,450	94.7%	16,307	94.5%	1,143	98.4%
Unemployed	6,797	4.4%	969	5.3%	950	5.5%	19	1.6%
Hispanic CLF	197,906		55,970		54,525		1,445	
Employed	183,779	92.9%	51,026	91.2%	49,646	91.1%	1,380	95.5%
Unemployed	14,127	7.1%	4,944	8.8%	4,879	8.9%	65	4.5%

* The Urban County is Prince George's County exclusive of the City of Bowie.

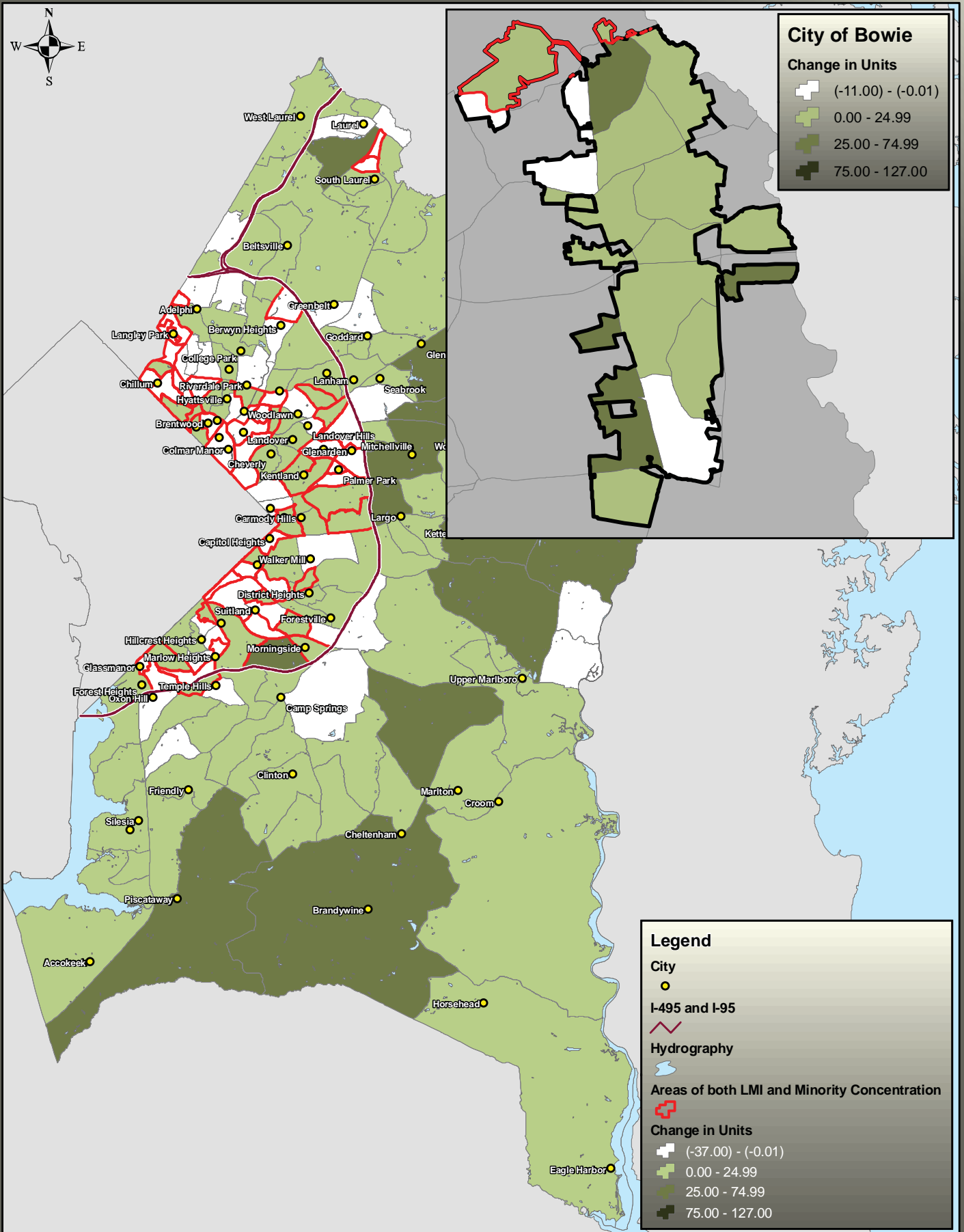
Source: U.S. Census Bureau, 2005-2009 American Community Survey (B23001, C23002A, C23002B, C23002D, C23002I)

C. Housing Market

i. Housing Inventory

The Urban County housing stock increased more than 16% in 2009 to 298,868 units from 257,024 in 1990. Figures 12-5 and 12-6 in Appendix B list the change in housing inventory by census tract in the Urban County and the City. Map 4 illustrates the net change in housing





inventory in the two jurisdictions. As illustrated in Map 4, the impacted areas in the County were most likely to experience a loss of units during this period.

Compared to the surrounding counties, Prince George’s County had the second highest increase in the number of owner housing units, but was the only county to experience a net decrease in rental units. The largest housing inventory growth occurred in Montgomery County, which increased its housing stock by more than 80,000 units.

**Figure 2-21
Trends in Housing Inventory in Surrounding Counties, 2000-2010**

	2000			2010			Change from 2000-2010		
	Renter	Owner	Vacant	Renter	Owner	Vacant	Renter	Owner	Vacant
Prince George’s County	109,433	177,177	15,768	107,859	194,047	23,259	(1,574)	16,870	7,491
Anne Arundel County	43,749	134,921	8,267	47,573	148,426	13,627	3,824	13,505	5,360
Calvert County	3,768	21,679	2,129	4,559	25,754	2,907	791	4,075	778
Charles County	9,097	32,571	2,235	9,444	40,454	3,688	347	7,883	1,453
Howard County	23,564	66,479	2,775	25,828	76,443	4,656	2,264	9,964	1,881
Montgomery County	101,548	223,017	10,067	108,362	244,815	18,584	6,814	21,798	8,517

Source: U.S. Census Bureau

In the City of Bowie, the total housing stock increased 8.3% from 18,622 to 20,171 units. Significant residential growth occurred in eight census tracts where the net increase in each of these areas exceeded 100 units during this period. Notably, the two impacted areas of concentration of minorities and LMI persons each gained a net of 150 units or more.

ii. Types of Housing Units

In 2009, the American Community Survey reported there were 278,515 occupied housing units in the Urban County. Of these, 91,524, or 32.9%, were multi-family units and 185,642, or 66.7%, were single-family units. Figure 12-7 in Appendix B details the proportion of multi-family units (i.e., two or more units attached) in each of the census tracts in the Urban County, and Map 5 on the following page illustrates the percentage of multi-family housing units in Prince George’s County and the City of Bowie.

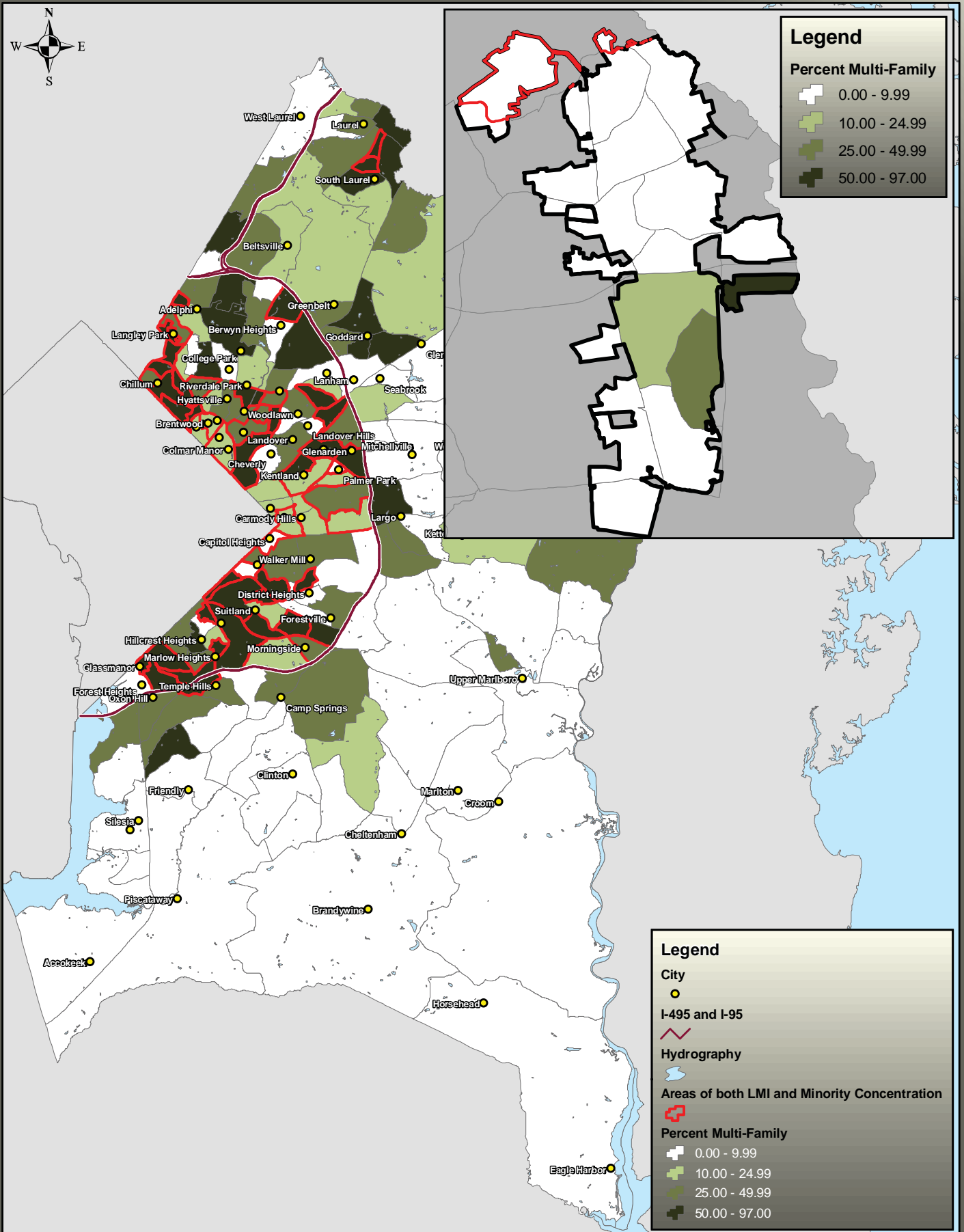
As illustrated in Map 5, impacted areas in the County have the highest proportion of multi-family units. Among the total housing stock in the Urban County’s impacted areas, 56.1% of units are multi-family.

In the City of Bowie, there were 19,422 occupied housing units in 2009. Of these, 16,923 were owner-occupied and 2,499 were renter-occupied as depicted in Figure 12-8. Only 2.3% of the owner-occupied housing stock included multi-family units compared to 52.7% of the rental housing inventory. The City’s total rental inventory was located in five of the City’s 14 census tracts, one of which is an impacted area. In four of the City’s 14 census tracts, renter-occupied multi-family units represented more than 10% of the occupied housing inventory in 2009. In eight census tracts there were only single family rental units; no multi-family rental units were counted in the housing inventory.



Map 5: Percentage Multi-Family Units, 2009

Prince George's County and the City of Bowie, MD Analysis of Impediments to Fair Housing Choice



iii. Protected Class Status and Home Ownership

The value in home ownership lies in the accumulation of wealth as the owner's share of equity increases with the property's value. Paying a monthly mortgage instead of rent is an investment in an asset that is likely to appreciate. According to one study, "a family that puts 5 percent down to buy a house will earn a 100 percent return on the investment every time the house appreciates 5 percent."¹²

Historically, minorities tend to have lower homeownership rates than Whites. In 2009 in the Urban County, Whites had a homeownership rate of 73.3%, while Blacks and Hispanics had significantly lower rates. Hispanics had the lowest rate of homeownership at 54.5% while the rate for Blacks was 61.0%. Asians had a higher rate of 64.1%, but this was still significantly less than the rate among Whites.

Across the Urban County, minority homeownership varied widely, as illustrated in Figure 12-9 in Appendix B and on Maps 6, 7, and 8 on the following pages. Homeownership rates among minorities were highest in the southern portion of the County and outside of impacted areas. Homeownership rates among Blacks, in particular, were lowest in impacted areas inside the Beltway.

A discussion of mortgage denial rates by race and ethnicity, as well as the prevalence of high-cost loans among minority homebuyers, is included in Section 4.B., Private Sector Policies.

Minority households in the Urban County were less likely to be homeowners.

Over three-quarters of White households in the Urban County were homeowners, compared to 62% of Blacks, 65.9% of Asians, and 55.4% of Hispanics, which reflects trends in median household incomes.

In the City of Bowie, the rates of minority homeownership were more comparable to the rate among Whites. Among Whites, the homeownership rate was 89.6%, which was significantly more than the Urban County (73.3%). More than four-fifths of all Black households (84.3%) owned their homes, and almost the same percentage of Hispanic households (82.0%) was homeowners. Asian households had the highest rate at 94.8%. Notably, homeownership among Black households was 75% or higher within the impacted area.

iv. Foreclosure Trends

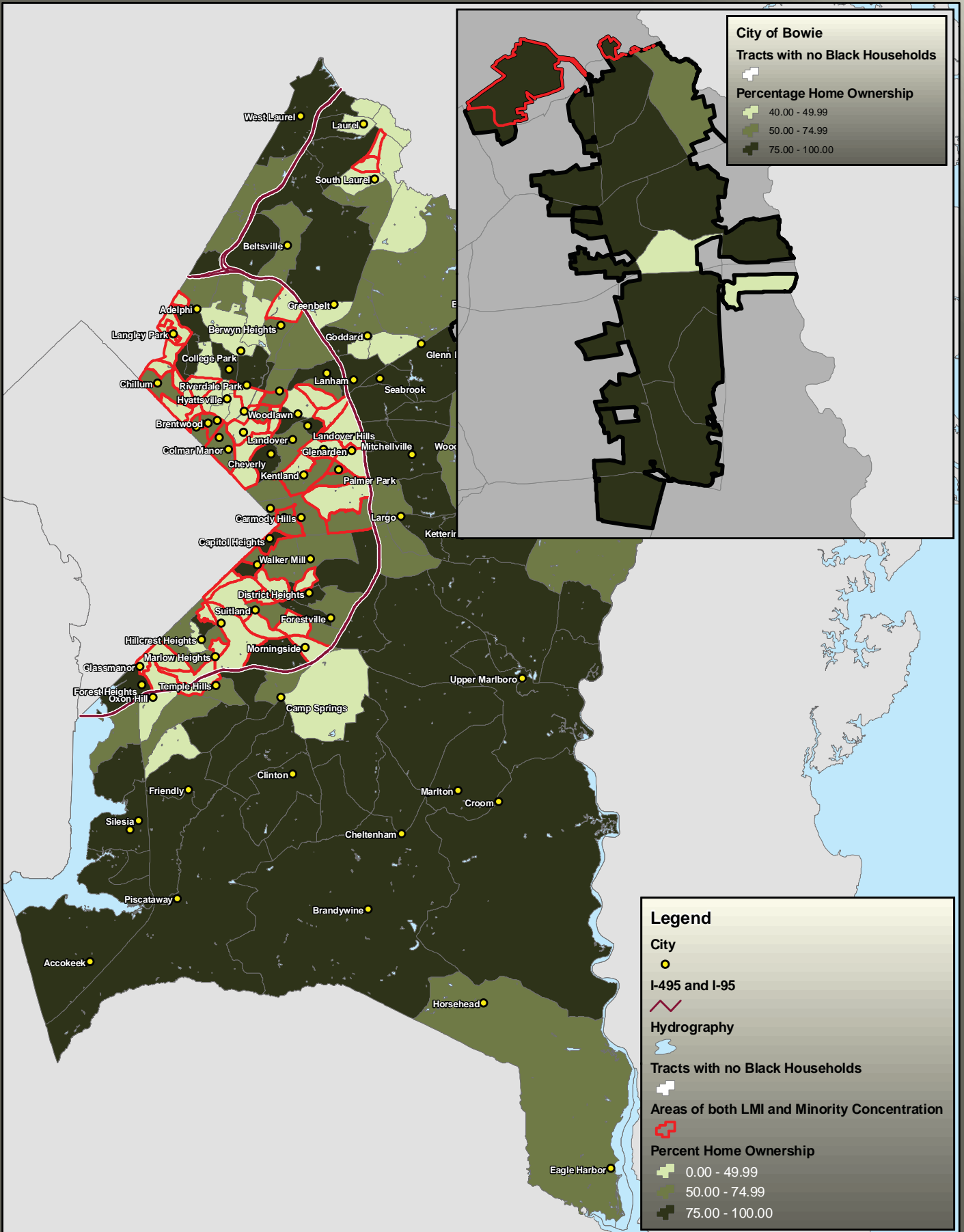
According to the 2010 midyear report from RealtyTrac, an aggregator of nationwide residential foreclosure, loan and property sales data, the state of Maryland had the 10th highest foreclosure rate among all states in June 2010 with 6,304 foreclosure filings, one for every 370 housing units. Filings include default notices, auction sale notices and bank repossessions. This represents a 7.7% increase from May 2010 and a 103% increase from June 2009. RealtyTrac detected two trends in the national data: Fewer properties entered foreclosure proceedings as lenders exercised more aggressive short sale and loan modification actions, and more properties

¹² Kathleen C. Engel and Patricia A. McCoy, "From Credit Denial to Predatory Lending: The Challenge of Sustaining Minority Homeownership," in *Segregation: The Rising Costs for America*, edited by James H. Carr and Nandinee K. Kutty (New York: Routledge 2008) p. 82.



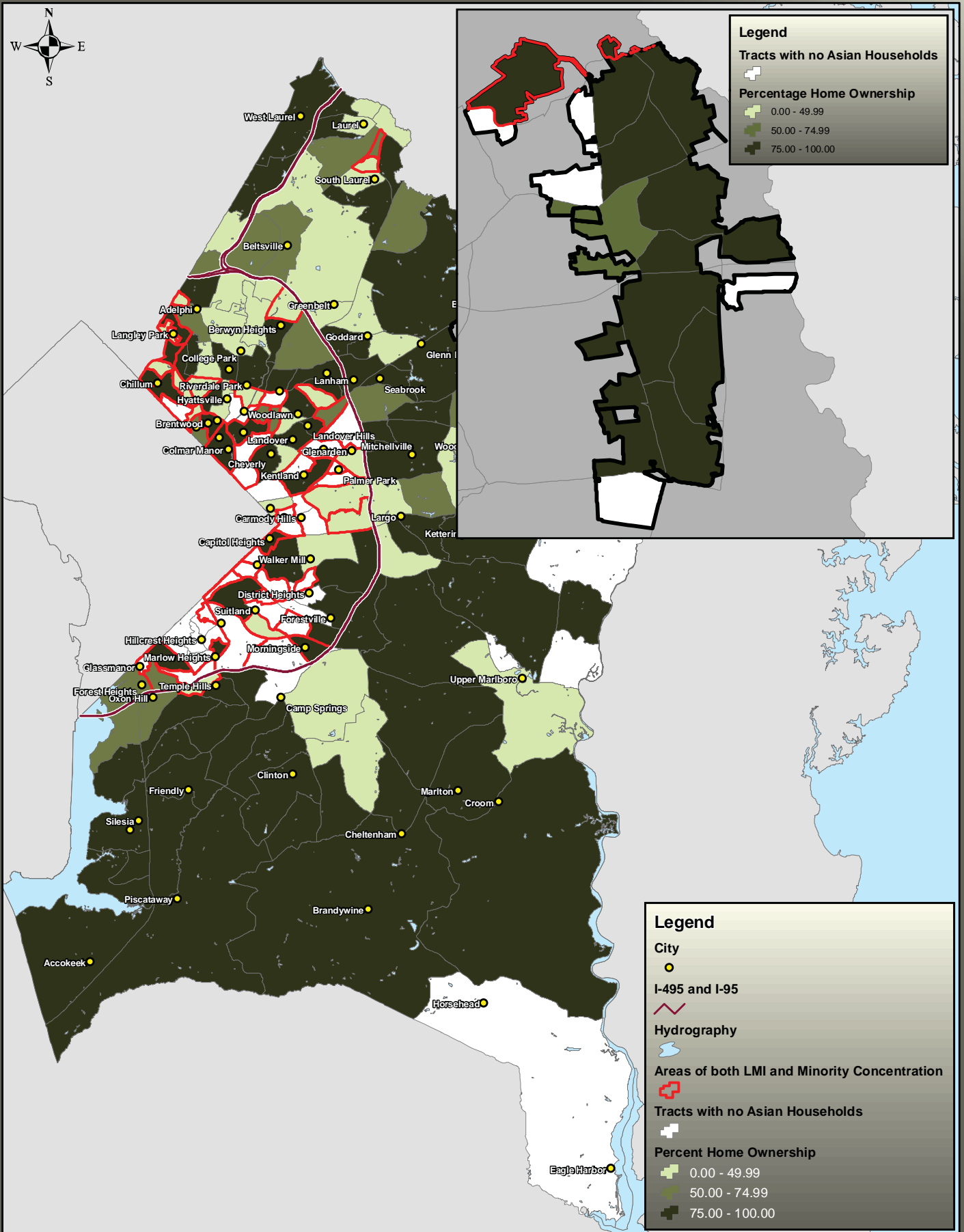
Map 6: Home Ownership Among Black Households, 2009

Prince George's County and the City of Bowie, MD Analysis of Impediments to Fair Housing Choice



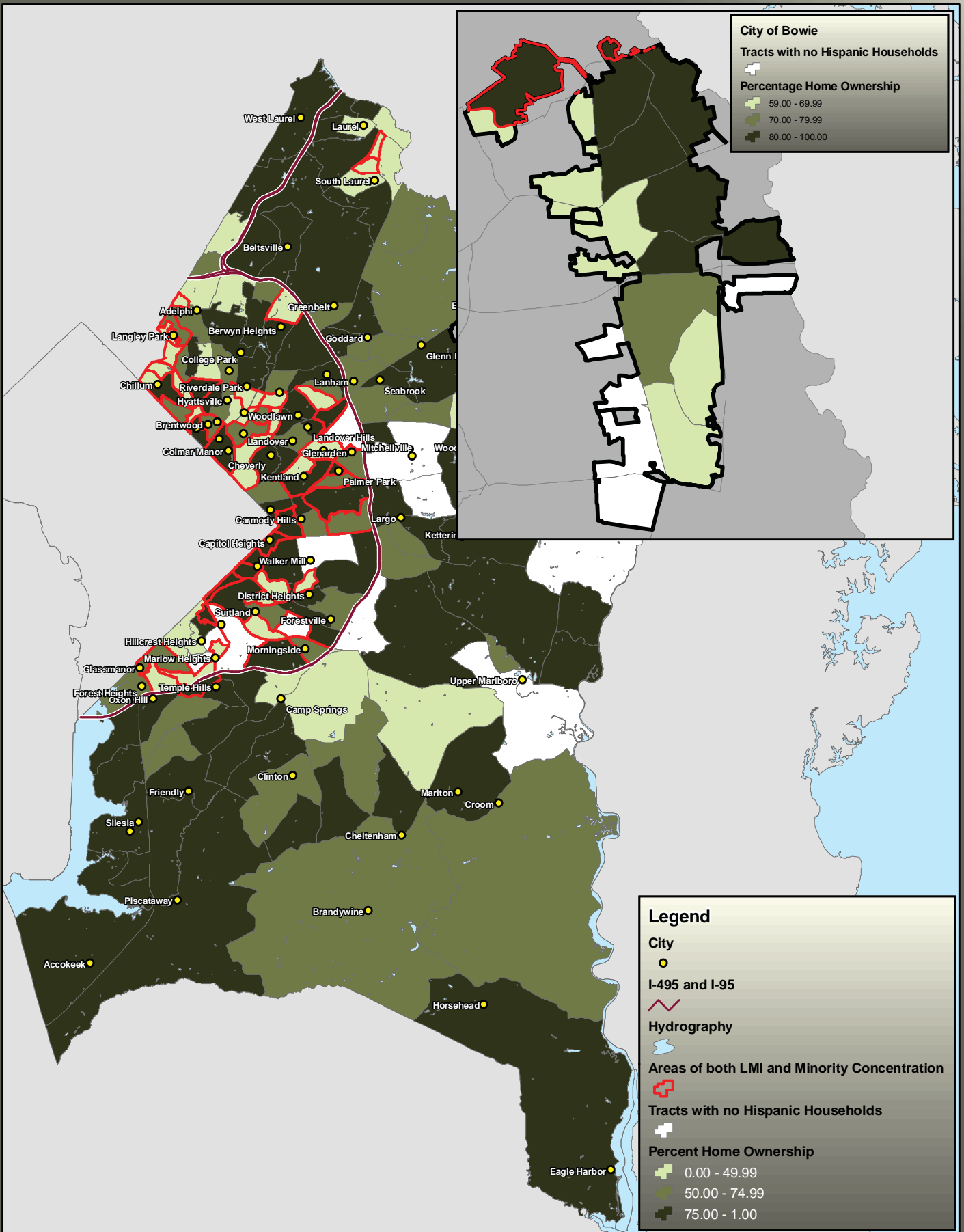
Map 7: Home Ownership Among Asian Households, 2009

Prince George's County and the City of Bowie, MD
Analysis of Impediments to Fair Housing Choice



Map 8: Home Ownership Among Hispanic Households, 2009

Prince George's County and the City of Bowie, MD Analysis of Impediments to Fair Housing Choice



completed the foreclosure process as lenders worked to clear a backlog of delinquent properties.¹³

Maryland's recently rising rates are contrary to national patterns, as filings across the U.S. fell 3% between May 2010 and June 2010 and nearly 7% from June 2009.¹⁴ However, rates in Maryland remain comparatively low due to the survival of a competitive housing market in which those who default on mortgages can still sell properties before foreclosure. The recent surge in Maryland foreclosures follows a lull from 2008 to mid-2009 that can be attributed largely to state law changes intended to delay or prevent foreclosures. The increase, which was projected to continue into 2011, reflects a rising number of owners becoming unable to meet housing costs due to such factors as unemployment or interest increases on adjustable-rate mortgages.

HUD NSP Estimates provides foreclosure data at the local level.¹⁵ Between January 2007 and June 2008, the State of Maryland had an estimated foreclosure rate of 3.3%. Prince George's County, on the other hand, had a higher estimated foreclosure rate of 5.4%, the second highest in the State. In Bowie, HUD NSP Estimates reported 848 foreclosures during this period, however, local officials dispute this number as significantly higher than more reliable local data. According to the City's estimates, there were only 255 foreclosed/vacant homes. The discrepancy may be explained by the fact that HUD NSP Estimates are not exact counts but estimates calculated on a national distributive basis using a model that includes home value decline, unemployment and high-cost mortgages.

¹³ "1.65 Million Properties Receive Foreclosure Filings in First Half of 2010," RealtyTrac press release, July 15, 2010

¹⁴ Ibid.

¹⁵ HUD NSP Estimates data, covering the period between January 2007 and June 2008, is not an exact count, but distributes the results of a national survey across geographic areas according to a model considering rates of metropolitan area home value decline, unemployment and high-cost mortgages. These estimates are the most comprehensive aggregate dataset publicly available at the local level. The primary purpose of the NSP dataset is to illustrate relative foreclosure risk based on factors that make census tracts more or less likely to be vulnerable to foreclosure, such as rising unemployment, high-cost loans, etc.



Figure 2-22
Estimated Residential Foreclosure Rates by County, January 2007 – June 2008

	Foreclosure Filings	Total Mortgages	Foreclosure Rate
State of Maryland	42,381	1,288,710	3.3%
Somerset County	126	2,310	5.5%
Prince George's County	14,493	269,431	5.4%
Baltimore city	4,376	81,414	5.4%
Dorchester County	182	4,333	4.2%
Charles County	2,011	49,190	4.1%
Wicomico County	510	14,041	3.6%
Allegany County	224	6,273	3.6%
Caroline County	205	5,970	3.4%
Washington County	918	26,834	3.4%
Baltimore County	5,133	158,374	3.2%
Calvert County	698	23,962	2.9%
Cecil County	525	19,363	2.7%
Kent County	68	2,514	2.7%
Garrett County	74	2,787	2.7%
Frederick County	1,557	62,624	2.5%
Harford County	1,385	57,211	2.4%
Anne Arundel County	2,903	133,889	2.2%
Montgomery County	4,607	216,232	2.1%
Worcester County	180	8,811	2.0%
St. Mary's County	426	22,089	1.9%
Queen Anne's County	229	11,969	1.9%
Carroll County	589	38,107	1.5%
Howard County	874	64,302	1.4%
Talbot County	88	6,680	1.3%

Source: HUD NSP Foreclosure Estimates, 2008

By 2010, Prince George's County had the highest foreclosure rate in the State.¹⁶ In the first quarter in 2010, foreclosures accounted for over one-third all home sales in the County, which contributed to the loss in median sales price during that time. During the third quarter in 2010, 1 in every 78 housing units in Prince George's County received a foreclosure filing, more than twice the rate of the State (1 in 166 housing units). Of the 14,087 foreclosure filings in Maryland during the third quarter, 4,112 (29.2%) were in Prince George's County.¹⁷

¹⁶ Washington Post, July 15, 2010. "Foreclosures in Prince George's County again lead Maryland." Accessed online on May 10, 2011 < <http://www.washingtonpost.com/wp-dyn/content/article/2010/07/14/AR2010071403313.html>>

¹⁷ "Maryland Foreclosure Activity Decreased in Third Quarter," RealtyTrac press release, November 30, 2010



Prince George's County has been widely recognized as "ground zero" for foreclosures in Maryland. In an April 2012 resolution to create a countywide Foreclosure Recovery Fund, the County Council reported that Prince George's County had the highest foreclosure rate in the State, accounting for 27% of Maryland's foreclosure filings during the last three months of 2011. Between 2007 and 2010, more than 56,000 homes were caught up in foreclosure.

Prince George's County was the only entitlement community in Maryland to receive NSP-3 funds. The allocation of \$1,802,242 reflected a need based on continued high foreclosure risk. HUD estimated that there were 6,248 foreclosure starts or REO completions in the County's greatest-need neighborhoods over the past three years. Additionally, the Federal Housing Finance Agency reported that by 2010, home prices in the metro area had declined 21.4% since hitting their peak. U.S. Postal System data identified 1,767 homes more than 90 days vacant in Prince Georges County's highest-need neighborhoods.

Prince George's County had the highest foreclosure rate in the State from 2010 through 2012.

One in every 78 housing units in the County received a foreclosure filing in the third quarter of 2010, compared to 1 in every 166 housing units throughout the State. Nearly one-third (29.1%) of all foreclosure filings in Maryland were located in Prince George's County. By April 2012, HUD estimated there were more than 6,248 foreclosure starts or REO completions in the County.

Between January 2007 and June 2008, the City of Bowie had an estimated 848 foreclosure filings, representing a foreclosure rate of 3.8%, which was lower than the County rate. Bowie had the third lowest foreclosure rate among places in the County, with only Eagle Harbor and University Park having lower rates. Capitol Heights, situated on the border with Washington D.C., had the highest foreclosure rate of 7.7%.



**Figure 2-23
Estimated Residential Foreclosure Rates by Place, January 2007 – June 2008**

	Foreclosure Filings	Total Mortgages	Foreclosure Rate		Foreclosure Filings	Total Mortgages	Foreclosure Rate
Prince George's County Total	14,493	269,431	5.4%	Greater Landover CDP	443	6,296	7.0%
Urban County*	13,645	247,330	5.5%	Greater Upper Marlboro CDP	609	12,327	4.9%
Bowie city	848	22,101	3.8%	Greenbelt city	232	5,296	4.4%
Accokeek CDP	215	4,423	4.9%	Hillandale CDP	31	604	5.1%
Adelphi CDP	213	3,747	5.7%	Hillcrest Heights CDP	279	4,273	6.5%
Andrews AFB CDP	1	25	4.0%	Hyattsville city	179	3,761	4.8%
Beltsville CDP	225	4,521	5.0%	Kettering CDP	335	6,524	5.1%
Berwyn Heights town	33	817	4.0%	Lake Arbor CDP	280	5,629	5.0%
Bladensburg town	79	1,284	6.2%	Landover Hills town	48	712	6.7%
Brandywine CDP	48	967	5.0%	Langley Park CDP	91	1,588	5.7%
Brentwood town	50	826	6.1%	Lanham-Seabrook CDP	392	6,728	5.8%
Calverton CDP	66	1,533	4.3%	Largo CDP	272	4,783	5.7%
Camp Springs CDP	433	7,226	6.0%	Laurel city	430	8,698	4.9%
Capitol Heights town	132	1,713	7.7%	Marlow Heights CDP	88	1,300	6.8%
Carmody Hills-Pepper Mill Village CDP	132	1,877	7.0%	Marlton CDP	239	4,525	5.3%
Cheverly town	74	1,734	4.3%	Mitchellville CDP	259	5,402	4.8%
Chillum CDP	327	6,153	5.3%	Morningside town	23	350	6.6%
Clinton CDP	675	12,180	5.5%	Mount Rainier city	52	1,049	5.0%
College Park city	162	3,650	4.4%	New Carrollton city	208	3,529	5.9%
Colmar Manor town	26	433	6.0%	North Brentwood town	11	190	5.8%
Coral Hills CDP	275	3,635	7.6%	Oxon Hill-Glassmanor CDP	586	9,602	6.1%
Cottage City town	31	520	6.0%	Riverdale Park town	59	1,194	4.9%
District Heights city	162	2,356	6.9%	Rosaryville CDP	335	6,748	5.0%
Eagle Harbor town	0	11	0.0%	Seat Pleasant city	114	1,521	7.5%
East Riverdale CDP	255	4,075	6.3%	South Laurel CDP	198	4,235	4.7%
Edmonston town	14	258	5.4%	Springdale CDP	60	1,121	5.4%
Fairmount Heights town	35	517	6.8%	Suitland-Silver Hill CDP	460	7,037	6.5%
Forest Heights town	62	1,012	6.1%	Temple Hills CDP	109	1,765	6.2%
Forestville CDP	352	5,196	6.8%	University Park town	11	473	2.3%
Fort Washington CDP	502	10,095	5.0%	Upper Marlboro town	25	507	4.9%
Friendly CDP	303	5,493	5.5%	Walker Mill CDP	182	2,594	7.0%
Glenarden city	86	1,528	5.6%	West Laurel CDP	41	1,149	3.6%
Glenn Dale CDP	279	6,324	4.4%	Woodlawn CDP	153	2,539	6.0%
Goddard CDP	72	1,254	5.7%	Woodmore CDP	144	3,339	4.3%

*The Urban County is Prince George's County exclusive of the City of Bowie

Source: HUD NSP Foreclosure Estimates, 2008

Foreclosure activity is related to fair housing to the extent that it is disproportionately dispersed, both geographically and among members of the protected classes. Concentrated foreclosures and residential vacancy threaten the viability of neighborhoods as well as the ability of families to maintain housing and build wealth. Households carrying heavy cost burdens are prime candidates for mortgage delinquency and foreclosure.



v. The Tendency of the Protected Classes to Live in Larger Households

Larger families may be at risk for housing discrimination on the basis of race and the presence of children (familial status). A larger household, whether or not children are present, can raise fair housing concerns. If there are policies or programs that restrict the number of persons that can live together in a single housing unit, and members of the protected classes need more bedrooms to accommodate their larger household, there is a fair housing concern because the restriction on the size of the unit will have a negative impact on members of the protected classes.

In the Urban County and the City of Bowie, minorities were much more likely than Whites to live in families with three or more persons. Among individual minority groups, Hispanics had the highest rates of larger family households in the County, but their rate in Bowie was comparable to Asians in the City of Bowie.

**Figure 2-24
Families with Three or More Persons, 2010**

Race/Ethnicity	Families with Three or More Persons					
	Prince George's County		Urban County		Bowie	
	#	%	#	%	#	%
All Family Households	133,353	65.5%	124,333	65.7%	9,020	63.2%
White	20,845	54.6%	17,419	54.9%	3,426	53.3%
Black	90,816	65.6%	86,058	65.3%	4,758	70.6%
Asian	5,261	70.2%	4,856	69.7%	405	77.3%
Some Other Race**	12,666	89.2%	12,454	89.3%	212	85.1%
Two or More Races	3,765	73.6%	3,546	73.9%	219	68.7%
Hispanic	20,646	87.9%	20,155	88.2%	491	77.0%

* The Urban County is Prince George's County exclusive of the City of Bowie.

** Includes American Indians/Alaska Natives and Native Hawaiians, as well as those identifying as "Some Other Race".

Source: 2006-2010 ACS (P28A - P28H)

To adequately house larger families, a sufficient supply of larger dwelling units consisting of three or more bedrooms is necessary. Across the County, less than 10% of the rental housing inventory included units with three or more bedrooms, which is considerably less than the approximately 55% of the owner inventory of three or more bedrooms. In the City of Bowie, more than 80% of all owner housing units had three or more bedrooms compared to only 6.5% of all rental units. Although it appears there is an excess supply of three-bedroom units (177,514) in the Urban County compared to the number of families with three or more persons (124,333), there is no data to describe the tenure by both family size and race/ethnicity.



**Figure 2-25
Housing Units by Number of Bedrooms, 2010**

	Renter-Occupied Housing Stock		Owner-Occupied Housing Stock	
	# of Units	% of Total Units	# of Units	% of Total Units
Prince George's County				
0-1 bedroom	36,910	12.2%	3,794	1.3%
2 bedrooms	44,568	14.8%	21,925	7.3%
3 or more bedrooms	26,381	8.7%	168,328	55.8%
Total	107,859	35.7%	194,047	64.3%
Urban County*				
0-1 bedroom	36,272	12.9%	3,645	1.3%
2 bedrooms	43,906	15.6%	20,876	7.4%
3 or more bedrooms	25,092	8.9%	152,422	54.0%
Total	105,270	37.3%	176,943	62.7%
City of Bowie				
0-1 bedroom	638	3.2%	149	0.8%
2 bedrooms	662	3.4%	1,049	5.3%
3 or more bedrooms	1,289	6.5%	15,906	80.8%
Total	2,589	13.1%	17,104	86.9%

* The Urban County is Prince George's County exclusive of the City of Bowie.
 Source: U.S. Census Bureau, 2006-2010 American Community Survey (B25042)

vi. Cost of Housing

Increasing housing costs are not a direct form of housing discrimination. However, a lack of affordable housing does constrain housing choice. Residents may be limited to a smaller selection of neighborhoods or communities because of a lack of affordable housing in those areas.

Real household income in Prince George's County decreased 5.2% between 1990 and 2009. Compounding this problem, median housing values surged 55.8%. By comparison, median gross rent fell only 0.2%. In the City of Bowie, real household income decreased at a lower rate (3.2%) while median housing value grew 44.8%. Similar to the County trend, median gross rent fell 1.7% in the City.



**Figure 2-26
Trends in Median Housing Value, Rent, and Income, 1990-2009**

	Median Housing Value (adjusted to 2009 dollars)	Median Gross Rent (adjusted to 2009 dollars)	Median Household Income (adjusted to 2009 dollars)
1990			
Prince George's County	\$209,693	\$1,111	\$74,616
Bowie	\$247,237	\$1,661	\$103,154
2000			
Prince George's County	\$187,495	\$949	\$71,155
Bowie	\$203,591	\$1,409	\$98,870
2009			
Prince George's County	\$326,700	\$1,109	\$70,753
Bowie	\$358,100	\$1,632	\$99,883
% Change from 1990-2009			
Prince George's County	55.8%	-0.2%	-5.2%
Bowie	44.8%	-1.7%	-3.2%

Sources: U.S. Census Bureau, 1990 Census STF3 (H061A, H043A, P080A); Census 2000 SF3 (H76, H63, P53); 2005-2009 American Community Survey (B25077, B25064, B19013); Bureau of Labor Statistics Inflation Calculator

Median housing value increased 55.8% in Prince George’s County while real household income declined 5.2%.

In Bowie, median housing value also outpaced real household income at slightly lower rates of 44.8% versus 3.2%. These trends indicate a greater likelihood that homebuyers will have difficulty purchasing housing units.

Among the five counties surrounding Prince George’s County, four experienced an increase in real household income, compared to the 5.2% decrease in Prince George’s. Median housing values in three counties outpaced that of Prince George’s, suggesting that housing costs in those counties are relatively less affordable. In Calvert and Montgomery Counties, the median housing value has increased at a slower pace than in Prince George’s County. All five counties experienced an increase in median gross rent, suggesting that the rental stock in Prince George’s County is relatively affordable compared to the region.



**Figure 2-27
Trends in Median Housing Value, Rent, and Income, 1990-2009**

	Median Housing Value (adjusted to 2009 dollars)	Median Gross Rent (adjusted to 2009 dollars)	Median Household Income (adjusted to 2009 dollars)
1990			
Prince George's County	\$209,700	\$1,111	\$74,616
Anne Arundel County	\$220,592	\$1,066	\$78,111
Calvert County	\$234,100	\$1,149	\$82,368
Charles County	\$211,100	\$1,194	\$80,304
Howard County	\$286,200	\$1,176	\$94,029
Montgomery County	\$344,300	\$1,280	\$93,581
2009			
Prince George's County	\$326,700	\$1,109	\$70,753
Anne Arundel County	\$369,200	\$1,248	\$81,824
Calvert County	\$319,400	\$1,202	\$90,621
Charles County	\$352,000	\$1,215	\$86,141
Howard County	\$454,800	\$1,302	\$101,003
Montgomery County	\$487,500	\$1,372	\$92,213
% Change from 1990-2009			
Prince George's County	55.8%	-0.2%	-5.2%
Anne Arundel County	67.4%	17.1%	4.8%
Calvert County	36.4%	4.6%	10.0%
Charles County	66.7%	1.8%	7.3%
Howard County	58.9%	10.7%	7.4%
Montgomery County	41.6%	7.2%	-1.5%

Sources: U.S. Census Bureau, 1990 Census STF3 (H061A, H043A, P080A); 2005-2009 American Community Survey (B25077, B25064, B19013); Bureau of Labor Statistics Inflation Calculator

a. Rental Housing

Both the Urban County and the City of Bowie have lost substantial numbers of affordable rental units since 2000 primarily through price increases, but some may also have been “lost” through demolition and conversions. Between 2000 and 2010, the number of affordable units renting for less than \$500/month decreased 52.4% in the Urban County and by 2010, there were no units renting for less than \$500 in the City of Bowie. In Bowie there were only 35 rental units leasing for less than \$750/month, compared to more than 250 units in 2000. By comparison, the number of higher-rent units (\$1,000/month or more) increased 428% in the Urban County and 33.5% in the City during the same period.

Urban County of Prince George’s County and the City of Bowie



Figure 2-28
Loss of Affordable Rental Housing Units, 2000-2010

Units Renting For:	2000	2010	Change 2000-2010	
			#	%
Urban County *				
Less than \$100	901	160	-741	-82.2%
\$100 to \$149	1,150	274	-876	-76.2%
\$150 to \$199	953	709	-244	-25.6%
\$200 to \$249	749	481	-268	-35.8%
\$250 to \$299	617	607	-10	-1.6%
\$300 to \$349	615	299	-316	-51.4%
\$350 to \$399	587	408	-179	-30.5%
\$400 to \$449	865	445	-420	-48.6%
\$450 to \$499	1,564	426	-1,138	-72.8%
\$500 to \$549	3,812	626	-3,186	-83.6%
\$550 to \$599	7,258	526	-6,732	-92.8%
\$600 to \$649	10,533	828	-9,705	-92.1%
\$650 to \$699	13,009	944	-12,065	-92.7%
\$700 to \$749	13,174	1,624	-11,550	-87.7%
\$750 to \$799	10,648	1,990	-8,658	-81.3%
\$800 to \$899	15,495	8,411	-7,084	-45.7%
\$900 to \$999	7,321	14,398	7,077	96.7%
\$1,000 to \$1,249	8,429	34,173	25,744	305.4%
\$1,250 to \$1,499	2,869	17,479	14,610	509.2%
\$1,500 to \$1,999	1,381	11,535	10,154	735.3%
\$2,000 or more	554	6,647	6,093	1099.8%
No cash rent	3,923	2,280	-1,643	-41.9%
City of Bowie				
Less than \$100	0	0	0	-
\$100 to \$149	27	0	-27	-100.0%
\$150 to \$199	0	0	0	-
\$200 to \$249	0	0	0	-
\$250 to \$299	0	0	0	-
\$300 to \$349	0	0	0	-
\$350 to \$399	14	0	-14	-100.0%
\$400 to \$449	0	0	0	-
\$450 to \$499	19	0	-19	-100.0%
\$500 to \$549	33	19	-14	-42.4%
\$550 to \$599	8	0	-8	-100.0%
\$600 to \$649	45	16	-29	-64.4%
\$650 to \$699	22	0	-22	-100.0%
\$700 to \$749	86	0	-86	-100.0%
\$750 to \$799	109	13	-96	-88.1%
\$800 to \$899	171	46	-125	-73.1%
\$900 to \$999	431	108	-323	-74.9%
\$1,000 to \$1,249	941	269	-672	-71.4%
\$1,250 to \$1,499	495	368	-127	-25.7%
\$1,500 to \$1,999	212	837	625	294.8%
\$2,000 or more	25	759	734	2936.0%
No cash rent	38	154	116	305.3%

* The Urban County is Prince George's County exclusive of the City of Bowie.

Sources: Census 2000 SF3 (H62); 2006-2010 American Community Survey (B25063)



The loss of affordable rental units over the past decade has been significant in both the Urban County and Bowie.

In the Urban County, over 47,000 units renting for less than \$750 a month were lost through price increases, demolitions, conversions, etc. In Bowie, a total of 219 units were lost.

The National Low Income Housing Coalition provides annual information on the Fair Market Rent (FMR) and affordability of rental housing in each county in the U.S. for 2010. In Prince George's County, the Fair Market Rent (FMR) for a two-bedroom apartment is \$1,494; however, HAPGC's payment standard for a two-bedroom unit is \$1,388, equivalent to 93% of the two-bedroom FMR. In order to afford the \$1,388 level of rent and utilities, without paying more than 30% of income on housing, a household must earn \$4,626 monthly or \$55,520 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a Housing Wage of \$26.69.

In Prince George's County and across Maryland, a minimum wage worker earns an hourly wage of \$7.25. In order to afford the FMR for a two-bedroom apartment, a minimum wage earner must work 147 hours per week, 52 weeks per year. Or, a household must include 3.68 minimum wage earners working 40 hours per week year-round in order to make the two-bedroom FMR affordable.

In Prince George's County, the estimated average wage for a renter is \$14.42 an hour. In order to afford the FMR for a two-bedroom apartment at this wage, a renter must work 74 hours per week, 52 weeks per year. Or, working 40 hours per week year-round, a household must include 1.85 workers earning the average renter wage in order to make the two-bedroom FMR affordable.

Minimum wage earners and single-wage earning households cannot afford a housing unit renting for the HUD fair market rent in Prince George's County.

This situation forces these individuals and households to double-up with others, or lease inexpensive, substandard units. Minorities and female-headed households may be disproportionately impacted because of their lower incomes.

Monthly Supplemental Security Income (SSI) payments for an individual are \$674 in Prince George's County and throughout Maryland. If SSI represents an individual's sole source of income, \$202 in monthly rent is affordable, while the FMR for a zero-bedroom is \$1,156.

Urban County of Prince George's County and the City of Bowie



Individuals whose sole source of income is a \$674 monthly SSI check cannot afford to rent a zero-bedroom unit in Prince George’s County at the HUD fair market rent of \$1,156.

This situation disproportionately impacts persons with disabilities whose only source of income may be their SSI checks.

b. Sales Housing

1) Prince George’s County

The sales market in Prince George’s County¹⁸ has followed recent national trends, with a growth in the number of sales between 2001 and 2004 and a steep decline during the latter half of the decade. At the peak of the market in 2004, a total of 15,080 single family units and condos were sold. Between 2005 and 2008, when the market bottomed out, the number of closings fell 67.4% to 4,921.

Median sales prices remained strong even after the number of closings began to fall, and the median sales price peaked at \$333,000 in 2006. By 2010, the median sales price had dropped by almost half, to \$185,000. The median sales price in the County continued to drop even after the number of closings began to rebound in 2009, most likely as a result of the glut of foreclosed properties in the market. During the same period, the average number of days on the market increased, from 44 days in 2006 to a peak of 133 days in 2009.

**Figure 2-29
Prince George’s County Housing Market Trends, 2001-2010**

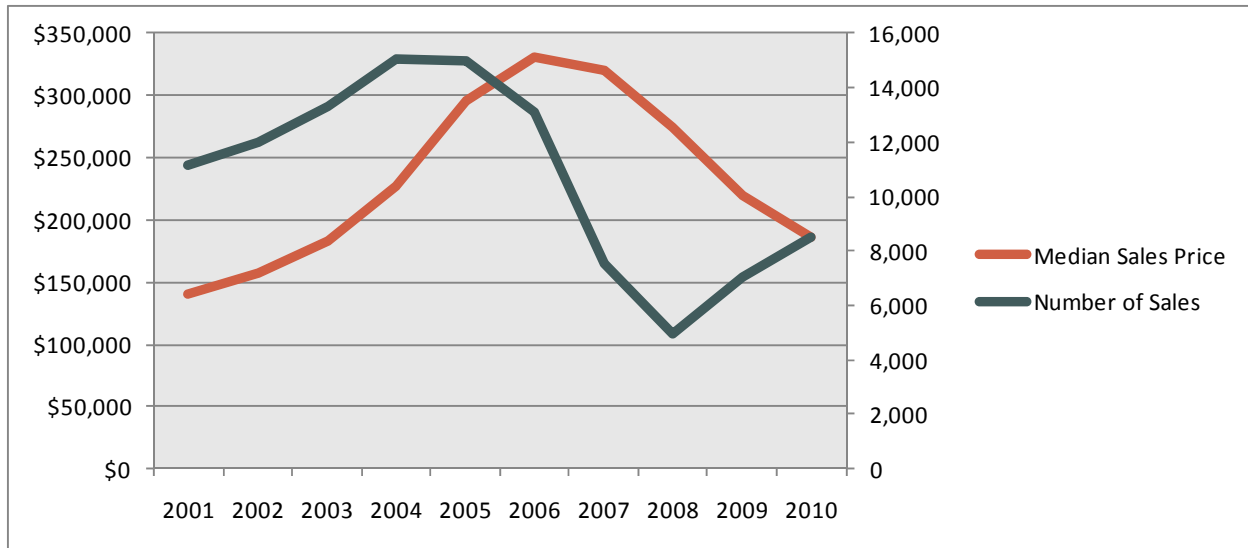
Year	Single-Family Units		
	Number of Sales	Median Sales Price	Average Days on Market
2001	11,150	\$140,000	82
2002	11,989	\$157,777	58
2003	13,299	\$183,000	38
2004	15,080	\$227,000	25
2005	14,976	\$296,000	21
2006	13,090	\$330,000	44
2007	7,557	\$320,000	82
2008	4,921	\$275,000	130
2009	7,013	\$220,000	133
2010	8,485	\$185,300	91

Source: RealEstate Business Intelligence

¹⁸ Data was not available for the Urban County, exclusive of the City of Bowie.



Figure 2-30
Prince George's County Housing Market Trends, 2000-2009



One method used to determine the inherent affordability of a housing market is to calculate the percentage of homes that could be purchased by households at the median income level.¹⁹ A relatively affordable housing market is one in which at least 40% of the homes could be purchased by households at the median household income. In 2006, the maximum affordable sales price for a household earning the median household income of \$65,851 was \$202,700. During that year, 409 units were sold for less than \$200,000, equivalent only 3.7% of all units sold. In 2010, the maximum affordable sales price for a household earning the median household income of \$70,753 was \$225,500. During that year, a total of 4,055 units were sold selling for less than \$200,000, representing 52.1% of all units sold. This large increase in affordable units is likely the result of the glut of foreclosed properties in the County. Consequently, for household earning the median household income in Prince George's County, the housing stock is an affordable one.

¹⁹ Joe Light, "Last of the Red-Hot Markets," *Money Magazine* December 2007: 53-56.



**Figure 2-31
Units Sold by Price and Number of Bedrooms, 2006 and 2010**

	0 to 2 Bedrooms	3 Bedrooms	4 or more Bedrooms	Total
<i>2006</i>				
Less than \$100,000	12	3	2	17
\$100,000 to \$199,999	204	168	20	392
\$200,000 to \$299,999	505	1,776	483	2,764
\$300,000 to \$399,999	141	2,321	2,443	4,905
\$400,000 to \$499,999	4	340	1,311	1,655
\$500,000 or more	3	58	1,294	1,355
Total	869	4,666	5,553	11,088
Maximum Affordable Sales Price*: \$202,700				
<i>2010</i>				
Less than \$100,000	236	659	301	1,196
\$100,000 to \$199,999	202	1,432	1,225	2,859
\$200,000 to \$299,999	69	906	1,350	2,325
\$300,000 to \$399,999	8	123	770	901
\$400,000 to \$499,999	-	23	323	346
\$500,000 or more	-	5	147	152
Total	515	3,148	4,116	7,779
Maximum Affordable Sales Price*: \$225,500				

*Determined using median household income for the given year

Source: RealEstate Business Intelligence

The sales housing market in Prince George’s County is an inherently affordable one for households earning the median household income.

In 2010, 52% of the units sold were affordable to households earning \$70,753. By comparison, only 3.7% of units sold in 2006 (at the height of the housing market) were affordable to households earning median household income.

It is possible also to determine the affordability of the housing market for each racial or ethnic group in the County. To determine affordability (i.e., how much mortgage a household could afford), the following assumptions were made:

- The mortgage was a 30-year fixed rate loan at a 5.0% interest rate,
- The buyer made a 10% down payment on the sales price,
- Property taxes were based on the median millage rate in the County, which was 1.342 for every \$100 assessed value,

Urban County of Prince George’s County and the City of Bowie



- There were additional consumer debt payments of \$1,000 a month (credit cards, student loans, etc), and
- The buyer's total debt payments (including principal, interest, taxes and insurance [PITI] and other consumer debt) equaled no more than 40% of gross monthly income,

Figure 2-33 details the estimated *maximum* affordable sales prices and monthly PITI payments for Whites, Blacks, Asians and Hispanics in Prince George's County. Whites and Blacks have relatively comparable median household incomes, and as such, all have similar maximum affordable purchase prices of around \$211,000. Asian households, with a significantly higher median income of almost \$81,000, can afford a home selling for up to \$273,000. Only Hispanic households earning the median income of \$58,432 were not able to afford the median sales price in 2010, which was \$185,300.

**Figure 2-32
Maximum Affordable Purchase Price by Race/Ethnicity, 2010**

	2010 Median Household Income	Monthly Debt Payment					Maximum Affordable Purchase Price
		Mortgage Principal & Interest	Real Estate Taxes	Homeowner's Insurance & PMI	Additional Debt Service	Total Payment	
Prince George's County Total	\$70,019	\$1,019	\$236	\$80	\$1,000	\$2,335	\$211,000
White Households	\$70,055	\$1,019	\$236	\$80	\$1,000	\$2,335	\$211,000
Black Households	\$70,288	\$1,029	\$238	\$80	\$1,000	\$2,347	\$213,000
Asian Households	\$80,969	\$1,319	\$305	\$80	\$1,000	\$2,704	\$273,000
Hispanic Households	\$58,432	\$705	\$163	\$80	\$1,000	\$1,949	\$146,000
2010 Median Sales Price: \$185,300							

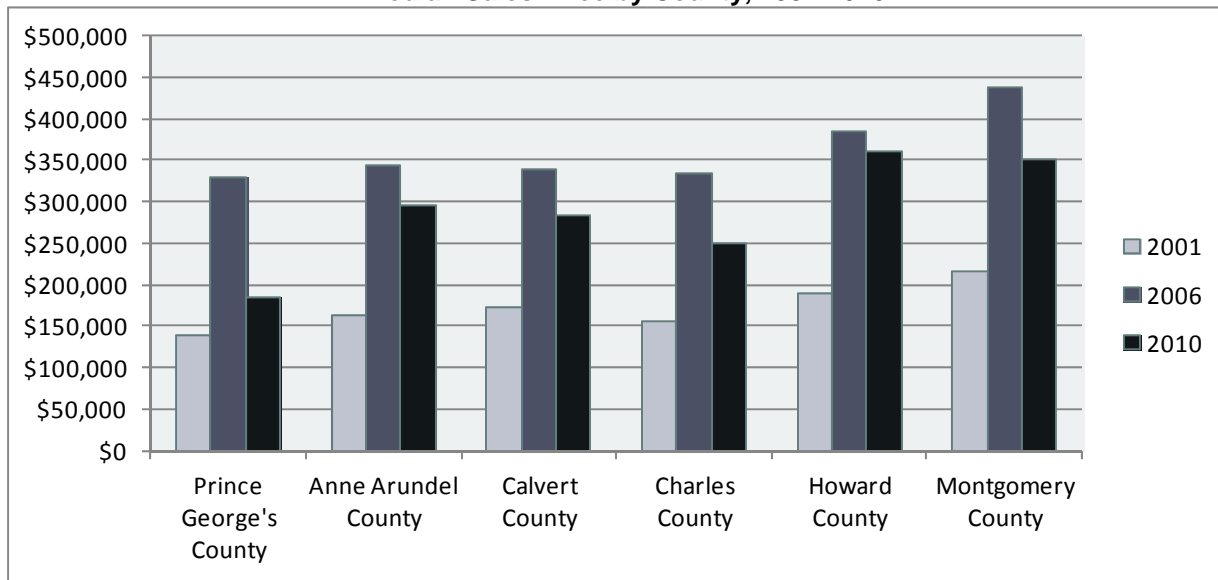
Sources: 2010 American Community Survey (B19013, B19013A, B19013B, B19013D, B19013I); RealEstate Business Intelligence; Calculations by Mullin & Lonergan Associates, Inc.

Among the surrounding counties, Prince George's consistently has had the lowest median sales price over the past decade, and by 2010 the disparity among housing values had grown. In 2001, the median sales price across the six counties ranged from \$140,000 in Prince George's to \$215,000 in Montgomery County, which also shares a border with Washington D.C. Between 2001 and 2006, during the height of the national sales market, the median sales price in Prince George's increased 136%, while sales prices in the other five counties increased 97% to 115%, thereby making the sales stock in Prince George's County comparable to those in Anne Arundel, Calvert, and Charles Counties.

Between 2007 and 2010, all six counties experienced a drop in the median sales price. However, the decrease was most dramatic in Prince George's County, where the median sales price fell 43.8%. Charles County experience the second largest drop in values of 25.4%, while the median sales price in Howard County decreased only 6.2%. By 2010, the median sales price in Prince George's County was nearly \$90,000 less than in any other county in the region, as highlighted in Figure 2-33.



**Figure 2-33
Median Sales Price by County, 2001-2010**



The median sales price in Prince George's County decreased more significantly than in neighboring counties.

Over the past decade the median sales price in Prince George's County has been the lowest among the five counties which it borders. However, by 2010 the disparity among the counties had grown, and the median sales price in Prince George's County was more than \$90,000 less than in any of the surrounding counties.

2) City of Bowie

Housing market trends in Bowie also have been indicative of the national market, with a sharp uptick in the number of sales around April through June of 2010, as the federal first-time homebuyer tax credit was expiring. (Although the tax credit expired at the end of April, homebuyers had until the end of June to finalize purchase and mortgage loan agreements.) These three months accounted for a third of the 1,103 housing sales made in 2010. Figure 2-34 outlines this peak and subsequent decline in monthly sales in Bowie over the last year. It should be noted that the average days that homes remained on the market was inversely related to housing sales, with the longest time on market corresponding to the lowest sales volumes.



Figure 2-34
Bowie Sales Housing Market Trends, 2010-2011

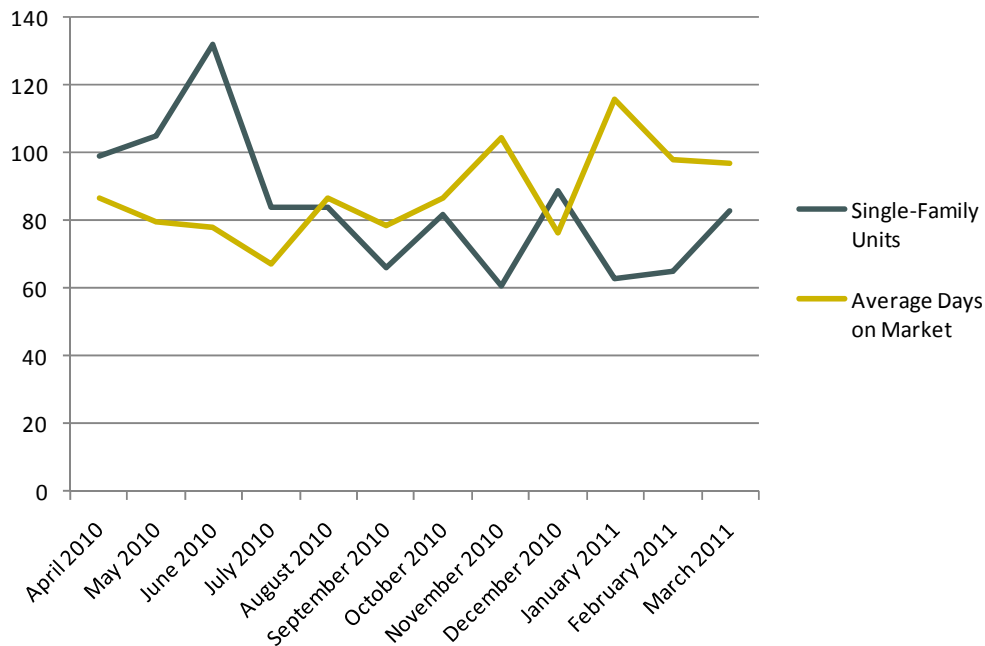
Month*	Number of Sales	Average Sales Price**	Average Days on Market
April 2010	99	\$288,771	87
May 2010	105	\$318,184	79
June 2010	132	\$286,721	78
July 2010	84	\$304,435	67
August 2010	84	\$300,198	86
September 2010	66	\$305,348	79
October 2010	82	\$313,251	87
November 2010	61	\$283,837	104
December 2010	89	\$294,392	76
January 2011	63	\$283,406	116
February 2011	65	\$297,914	98
March 2011	83	\$265,739	97

* Data for Bowie was compiled from Zip Codes 20715, 20716, 20720, and 20721

** Average sales price for the City is a weighted average of all four zip codes

Source: RealEstate Business Intelligence

Figure 2-35
Bowie Housing Market Trends: Sales, 2010 to 2011



Source: RealEstate Business Intelligence

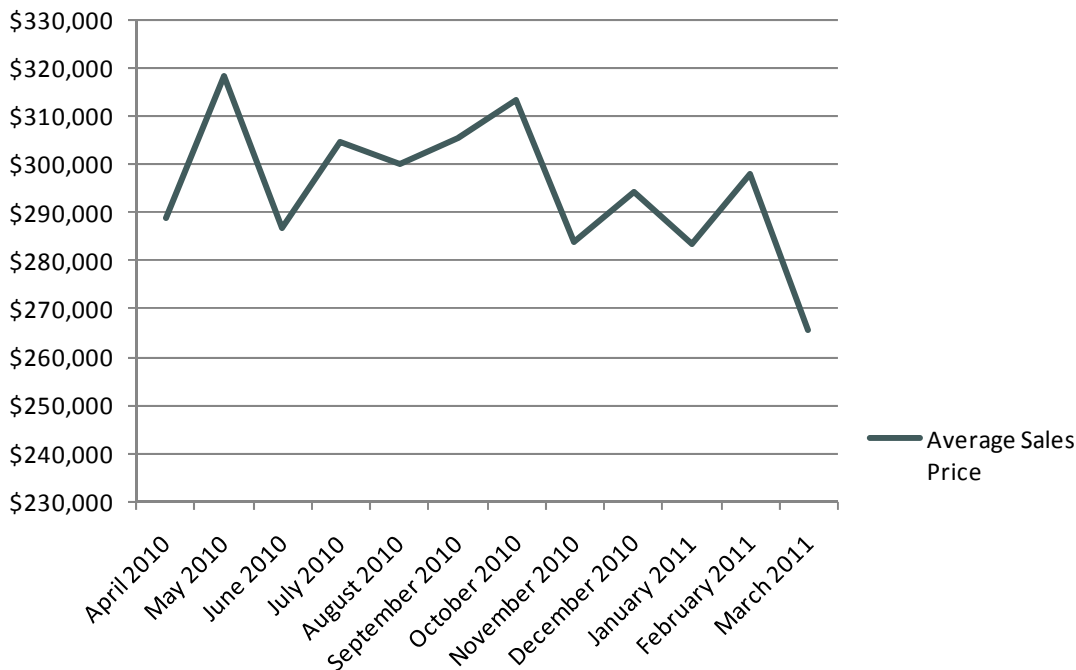


During the period of growth in the early part of the last year, average sales prices increased from \$288,771 in April 2010 to \$318,184 in May, the highest figure over the last 12 months. From that point forward, average sales prices steadily declined, except for a brief spike during September and October 2010, in conjunction with falling housing sales. January, the month with the fewest sales (63) also had the lowest average sales price at \$283,406. These numbers represent decreases of 52.3% and 10.9% from the highs of 132 units sold and \$318,184 average sale price, respectively.

The average sales price in Bowie decreased from \$288,771 in April 2010 to \$265,739 in March 2011.

During this period, the average days on the market also increased from 87 to 97 days.

**Figure 2-36
Bowie Housing Market Trends: Average Sale Price, 2010 to 2011**



Source: RealEstate Business Intelligence



vii. Protected Class Status and Housing Problems

Lower income minority households tend to experience housing problems at a higher rate than lower income White households.²⁰ In the Urban County among all lower income renters, 77.4% of Hispanic households reported housing problems compared to 57.2% of Whites and 59.3% of Blacks. The highest degree of housing problems was reported among small and large households. While the total number of Hispanic renter households was less than other minority household types, Hispanics were much more likely to experience housing problems than other subpopulations. Notably, Hispanic renters residing in Bowie fared slightly better than their Urban County counterparts. In the City, the rates of housing problems were lower than Black and White households, but it is difficult to interpret the data because the sample size is very small.

Among Black renters, elderly and “All Other” household types experienced housing problems at comparable rates to Whites and Hispanics. Rates were lowest for elderly and small households.

**Figure 2-37
Lower Income Households with Housing Problems in the Urban County, 2000**

Urban County	All Households 0-80% of MFI		Elderly Households 0-80% of MFI			Small & Large Households 0-80% of MFI			All Other Households 0-80% of MFI		
	Total	% with a Housing Problem	Total	With a Problem	%	Total	With a Problem	%	Total	With a Problem	%
Renters											
White Non-Hispanic	10,529	57.2%	2,111	1,205	57.1%	3,506	1,651	47.1%	4,912	3,160	64.3%
Black Non-Hispanic	44,375	59.3%	4,055	2,469	60.9%	25,495	16,019	62.8%	14,825	7,854	53.0%
Hispanic	5,456	77.4%	104	60	57.7%	4,316	3,490	80.9%	1,035	670	64.7%
Total	60,360	60.6%	6,270	3,734	59.6%	33,317	21,160	63.5%	20,772	11,684	56.2%
Owners											
White Non-Hispanic	11,972	48.8%	6,685	2,586	38.7%	3,151	1,894	60.1%	2,136	1,365	63.9%
Black Non-Hispanic	20,792	77.8%	4,216	2,834	67.2%	12,160	9,837	80.9%	4,416	3,515	79.6%
Hispanic	1,969	81.5%	160	85	53.1%	1,669	1,385	83.0%	160	135	84.4%
Total	34,733	68.0%	11,061	5,505	49.8%	16,980	13,116	77.2%	6,712	5,015	74.7%

Source: 2000 HUD Comprehensive Housing Affordability Strategy data

Among owner households, Blacks had higher rates of housing problems overall in the City than in the Urban County. Notably, Black households experienced the highest rates of housing problems in the City but some of the lowest rates in the Urban County. This could indicate a need for rehabilitation and/or rental assistance for minority households in Bowie.

²⁰ HUD defines housing problems as (1) cost burden of 30% or more (i.e. paying more than 30% of gross income on monthly housing expenses), and/or (2) lacking complete kitchen or plumbing facilities, and/or (3) overcrowding of more than 1.01 persons per room.



**Figure 2-38
Lower Income Households with Housing Problems in Bowie, 2000**

City of Bowie	All Households 0-80% of MFI		Elderly Households 0-80% of MFI			Small & Large Households 0- 80% of MFI			All Other Households 0-80% of MFI		
	Total	% with a Housing Problem	Total	With a Problem	%	Total	With a Problem	%	Total	With a Problem	%
Renters											
White Non-Hispanic	491	82.3%	159	145	91.2%	219	154	70.3%	113	105	92.9%
Black Non-Hispanic	270	85.2%	105	75	71.4%	105	105	100.0%	60	50	83.3%
Hispanic	14	71.4%	---	---	---	4	0	0.0%	10	10	100.0%
Total	775	83.1%	264	220	83.3%	328	259	79.0%	183	165	90.2%
Owners											
White Non-Hispanic	1,613	59.8%	685	220	32.1%	709	575	81.1%	219	170	77.6%
Black Non-Hispanic	453	85.0%	39	25	64.1%	270	240	88.9%	144	120	83.3%
Hispanic	40	50.0%	10	0	0.0%	20	20	100.0%	10	0	0.0%
Total	2,106	65.0%	734	245	33.4%	999	835	83.6%	373	290	77.7%

* A marking of "—" indicates that there are no households in the group.
Source: 2000 HUD Comprehensive Housing Affordability Strategy data

Minority households were more likely than Whites to have housing problems in the Urban County and Bowie.

In the Urban County, Hispanics were most likely to have a housing problem, with 77.4% of Hispanic renter households and 81.5% of Hispanic homeowners having at least one housing problem. In Bowie, 85.2% of Black renters and 85% of Black homeowners had a housing problem.



3. Evaluation of Fair Housing Profile

This section provides a review of the existence of fair housing complaints or compliance reviews where a charge of a finding of discrimination has been made. Additionally, this section will review the existence of any fair housing discrimination suits filed by the United States Department of Justice or private plaintiffs in addition to the identification of other fair housing concerns or problems.

A. Existence of Fair Housing Complaints

A lack of filed complaints does not necessarily indicate a lack of housing discrimination. Some persons may not file complaints because they are not aware of how to go about filing a complaint or where to go to file a complaint. In a tight rental market, tenants may avoid confrontations with prospective landlords. Discriminatory practices can be subtle and may not be detected by someone who does not have the benefit of comparing his treatment with that of another home seeker. Other times, persons may be aware that they are being discriminated against, but they may not be aware that the discrimination is against the law and that there are legal remedies to address the discrimination. Finally, households may be more interested in achieving their first priority of finding decent housing and may prefer to avoid going through the process of filing a complaint and following through with it. Therefore, education, information, and referral regarding fair housing issues remain critical to equip persons with the ability to reduce impediments.

i. HUD's Office of Fair Housing and Equal Opportunity

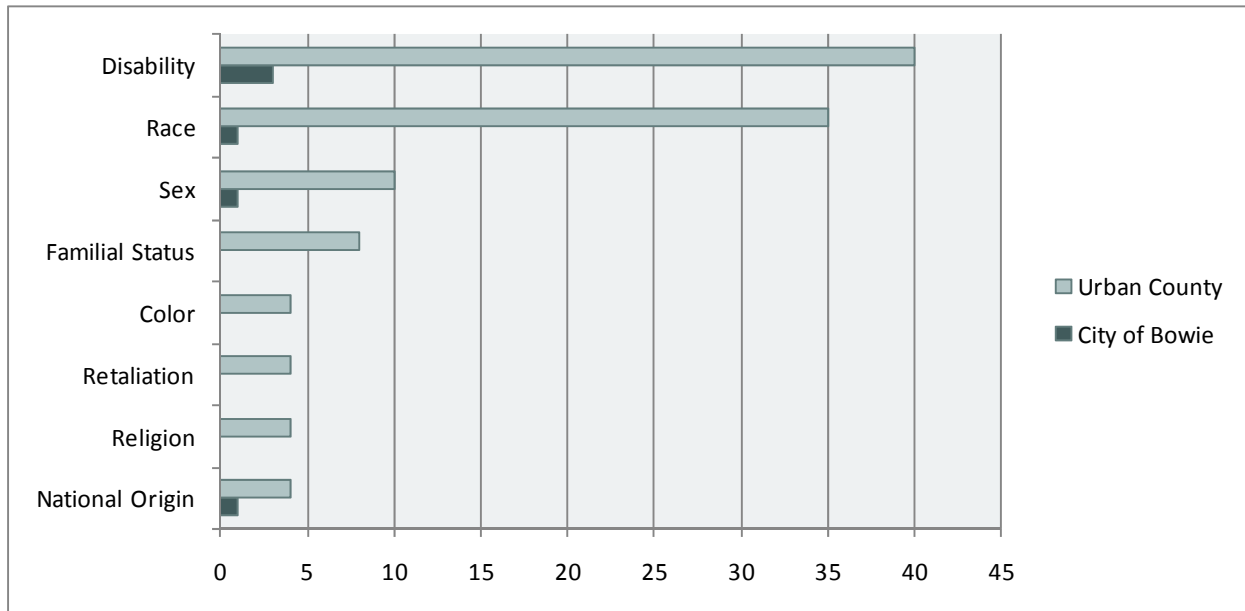
The Office of Fair Housing and Equal Opportunity (FHEO) at HUD processes complaints from persons regarding alleged violations of the Fair Housing Act. Between January 2005 and January 2011, 91 complaints from the Urban County and four from the City of Bowie were filed with FHEO.

Of the 91 complaints in the Urban County, 40 (44%) alleged discrimination on the basis of disability and 35 (38.5%) on the basis of race. Ten complaints alleged discrimination on the basis of sex and 8 on familial status. Four complaints were alleged on each of the following bases: color, retaliation, religion, and national origin. Several complaints alleged discrimination on multiple bases.

In the City of Bowie, three of the four complaints alleged discrimination on the basis of disability. One complaint for each basis was also filed for race, sex, and national origin.



**Figure 3-1
Alleged Bases of Discrimination Complaints filed through FHEO, 2005-2011**



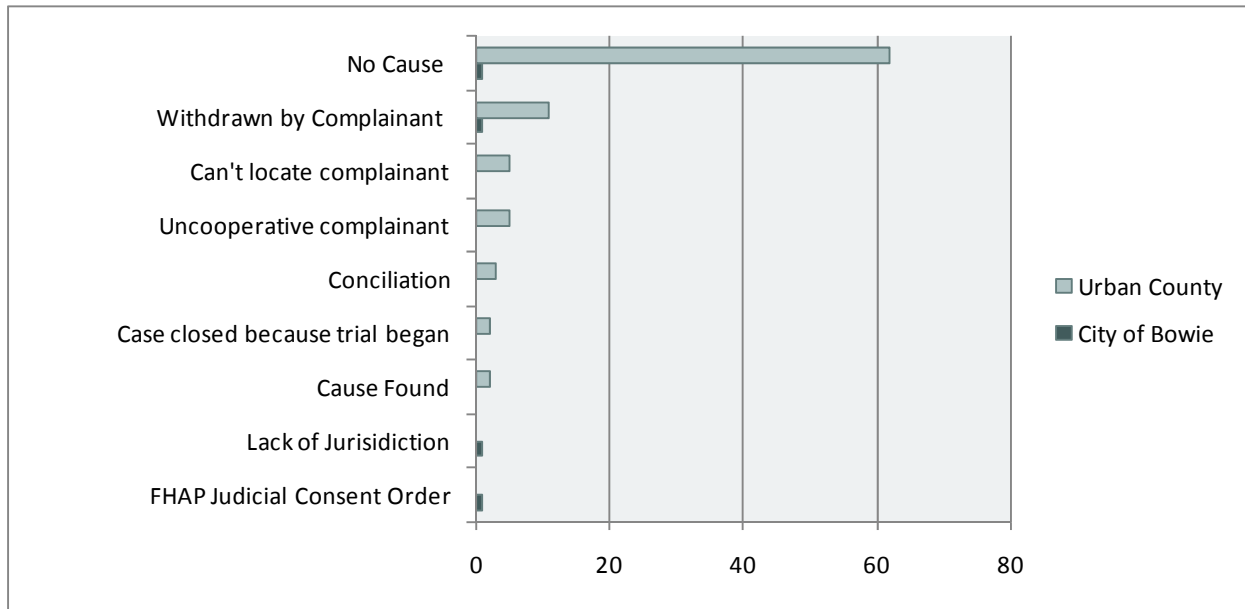
The vast majority of cases were closed due to “no cause” findings. In the Urban County, 62 cases were determined to have no cause, and one case in Bowie was determined to have no cause. “Without cause” is a determination made when there is insufficient evidence found during the investigation to substantiate the complainant’s allegations of housing discrimination.

Complainants withdrew their complaints in 11 cases in the Urban County and one in Bowie. In the Urban County, 13 cases were closed due to an uncooperative complainant, the inability to locate a complainant, or because the case was successfully conciliated. In Bowie, one case was closed due to lack of jurisdiction. Caution should be used when interpreting complaints that are withdrawn, closed due to an uncooperative complainant, etc. This resolution does not always mean that housing discrimination has not occurred. In the case of a complainant withdrawing a complaint, an uncooperative complainant, or a complainant who cannot be located, it is possible that the complainant changed his or her mind, decided against the trouble of following through with a complaint, chose to seek other housing without delay or some other reason.

Cause was found in two cases originating from the Urban County, both of which alleged discrimination on the basis of disability. Additionally, two cases from the Urban County were closed when the cases went to trial, both of with alleged racial discrimination. As of February 2011, one case in the Urban County was still open. In Bowie, one complaint alleged discrimination on the basis of disability and was closed with an FHAP Judicial Consent Order, which usually results in a final, binding order memorializing a voluntary agreement between parties.



Figure 3-2
Reasons for Closing of Fair Housing Complaints Filed with FHEO, 2005-2011



B. Patterns and Trends in Fair Housing Complaints

Disability was the most common alleged basis of discrimination in the Urban County and Bowie, with 43 of the 95 cases filed in the two jurisdictions alleging such discrimination. Race was the second most frequent alleged basis of discrimination. Such a high number of housing complaints based on disability and racial discrimination indicate a need for testing, particularly among rental units.

Nationally, race is the primary basis for housing discrimination complaints. HUD, however, is finding that more complaints are being filed on the basis of disability. Such is the case in both the Urban County and Bowie.

Disability and race were the primary bases for alleging discrimination in the Urban County and Bowie.

These trends indicate a need for testing, fair housing education and outreach, and enforcement of fair housing laws.

C. Existence of Fair Housing Legal Proceedings

There are no fair housing suits or court orders that have been filed and/or are pending in the Urban County or the City of Bowie.



D. Determination of Unlawful Segregation

There are no unlawful segregation suits or court orders that have been filed and/or are pending in the Urban County of the City of Bowie.



4. Evaluation of Public and Private Sector Policies

A. Public Sector Policies

The analysis of impediments is a review of impediments to fair housing choice in the public and private sector. Impediments to fair housing choice are any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices, or any actions, omissions or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status or national origin. Policies, practices or procedures that appear neutral on their face but which operate to deny or adversely affect the provision of housing to persons of a particular race, color, religion, sex, disability, familial status or national origin may constitute such impediments.

An important element of the AI includes an examination of public policy in terms of its impact on housing choice. This section evaluates the public policies in the Urban County and the City of Bowie to determine opportunities for furthering the expansion of fair housing choice.

i. Prince George's County Housing Authority

In Prince George's County, the Housing Authority is one of three agencies comprising the Department of Housing and Community Development. An interview was conducted with the Housing Authority of Prince George's County (HAPGC) staff. HAPGC also completed a written AI questionnaire upon request. The following information was developed from responses to the interview and the AI questionnaire completed by HAPGC, as well as several policy documents provided by HAPGC and interviews with other stakeholders.

a. Public Housing

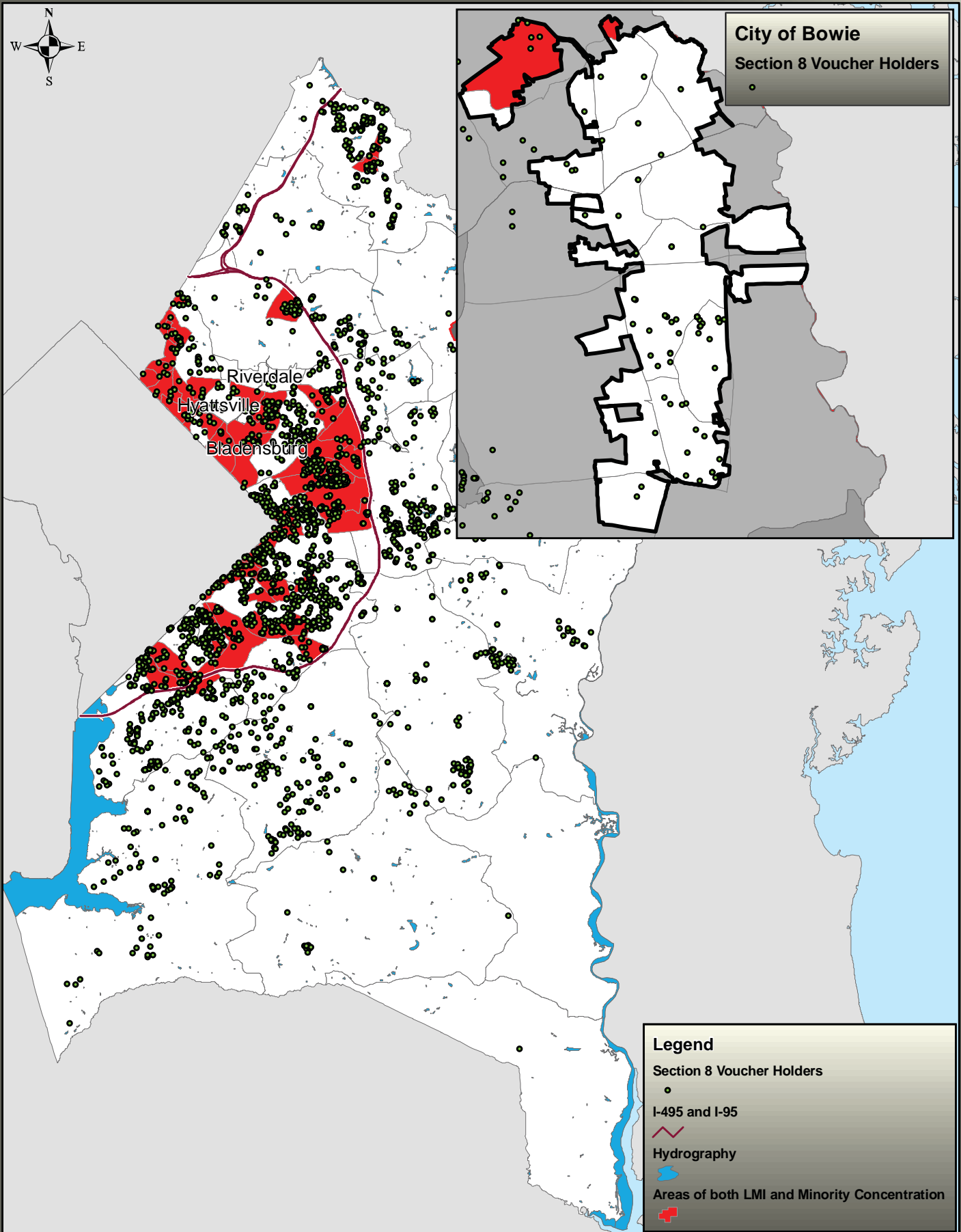
1) Inventory and Demographics

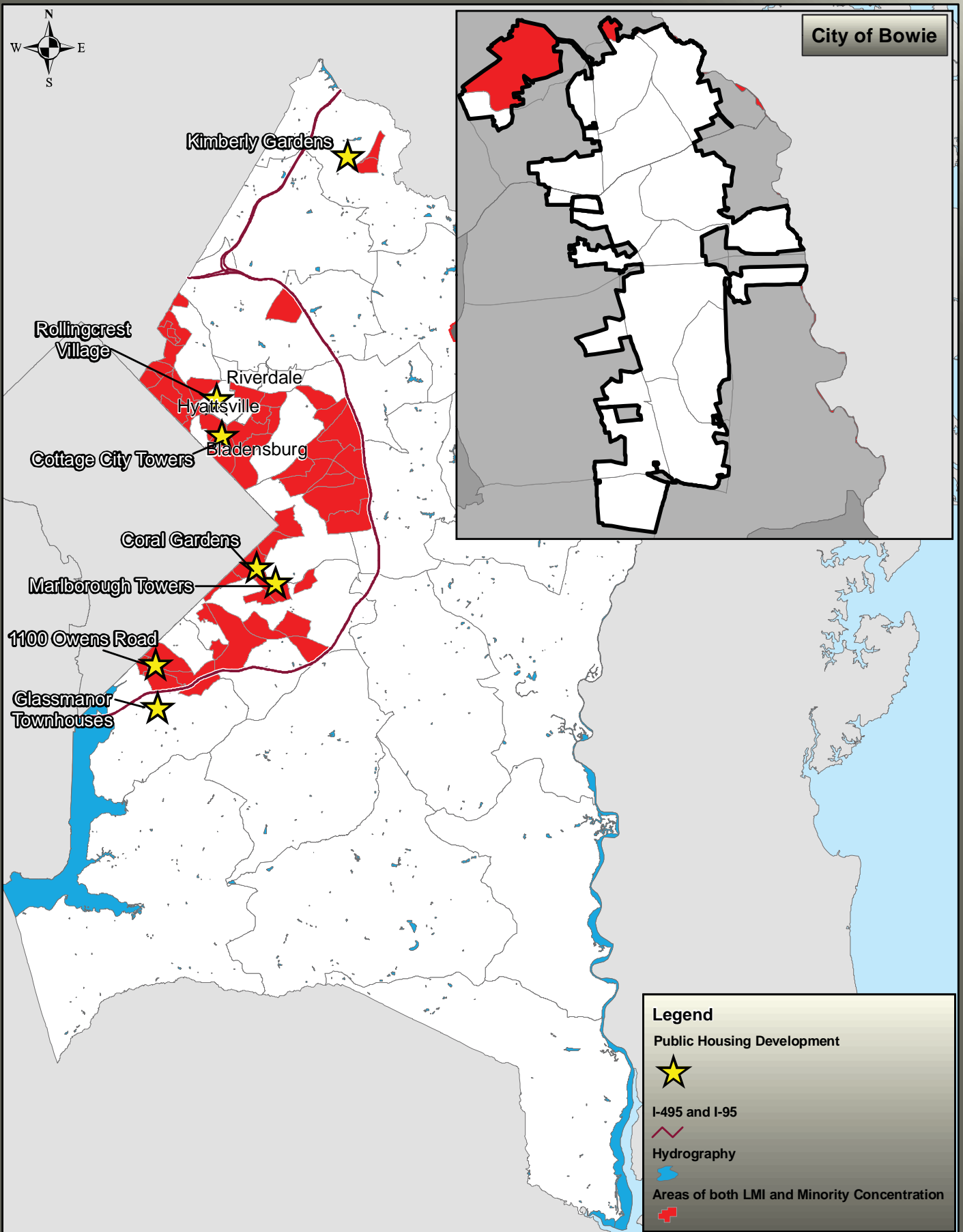
HAPGC owns and manages 376 units across six developments in the County. Additionally, HAPGC owns and operates Coral Gardens, a 16-unit affordable housing development in Capitol Heights. As of March 2011, there were 349 tenant households in HAPGC's public housing developments, representing an occupancy rate of 92.8%.

Map 9 on the following page illustrates the location of the HAPGC communities. Three of the communities (Kimberly Gardens in Laurel, Rollingcrest Village in Hyattsville, and Glassmanor Townhouses in Oxon Hill) are located outside of impacted areas of concentration of minorities and LMI persons.

Elderly households and persons with disabilities comprised 37.2% and 56.4% of public housing households, respectively. Families with children accounted for less than 15% tenant households. Almost 95% of tenants were Black, compared to 63.8% of the County on the whole in 2009. Almost 80% of residents, primarily elderly tenants and disabled tenants, lived in studio or one-bedroom units.







**Figure 4-1
Characteristics of Current Public Housing Residents, 2010**

	Public Housing Residents	
	# of Households	%
Total Households	349	100.0%
Extremely Low Income (<30% MFI)	331	94.8%
Very Low Income (>30% but <50% MFI)	15	4.3%
Low Income(>50% but <80 % MFI)	2	0.6%
Families with Children	52	14.9%
Elderly Households (1 or 2 persons)	130	37.2%
Individuals/Families with Disabilities	197	56.4%
Black Households	329	94.3%
White Households	18	5.2%
Asian Households	2	0.6%
Other Race of Households	0	0.0%
Characteristics by Bedroom Size		
0 Bedroom	113	32.4%
1 Bedroom	165	47.3%
2 Bedroom	33	9.5%
3 Bedroom	28	8.0%
4+ Bedroom	10	2.9%

Note: Percentage may not equal 100% due to rounding and overlap among household types

Source: Prince George's County Housing Authority

2) Waiting List

HAPGC utilizes a single, community-wide waiting list for its applicants. Per HAPGC policy, the waiting list closes once the approximate wait exceeds 12 months.

Applicants must accept the first unit offered to them or provide a “good cause” reason why the unit is inappropriate. Good causes for unit refusal include:

- Reasons relating to health and
- Proximity to work, school, and childcare.

In March 2011, there were 2,902 applicants on HAPGC’s public housing waiting list, over seven times as great as the total number of units available. Among public housing applicants, over half (56%) were households with a disabled member and 17% were elderly households.



Over half of the public housing waiting list applicants include family members with disabilities.

Demographics of waiting list applicants are similar to those of current public housing residents. Black households comprised 94.6% of applicants while White households accounted for only 4.2% of applicants.

**Figure 4-2
Characteristics of Public Housing Applicants, 2010**

	Public Housing Waiting List	
	# of Households	%
Total Households	2,902	100.0%
Extremely Low Income (<30% MFI)	2,764	95.2%
Very Low Income (>30% but <50% MFI)	132	4.5%
Low Income(>50% but <80 % MFI)	4	0.1%
Families with Children	N/A	N/A
Elderly Households (1 or 2 persons)	494	17.0%
Individuals/Families with Disabilities	1,625	56.0%
Black Households	2,746	94.6%
White Households	123	4.2%
Asian Households	19	0.7%
Other Race of Households	14	0.5%
Characteristics by Bedroom Size		
0 Bedroom	1,790	61.7%
1 Bedroom	205	7.1%
2 Bedroom	551	19.0%
3 Bedroom	327	11.3%
4+ Bedroom	29	1.0%

Note: Percentage may not equal 100% due to rounding and overlap among household types

Source: Prince George's County Housing Authority

3) Redevelopment Plans

As of March 2011, HAPGC did not have any plans for the demolition of any units or any expansions.

4) Section 504 Needs Assessment

Section 504 of the Rehabilitation Act of 1973 and 24 CFR Part 8 require that 5% of all public housing units be accessible to persons with mobility impairments. Another 2% of public housing units must be accessible to persons with sensory impairments. In addition, a PHA's administrative offices, application offices and other non-residential facilities must be accessible to persons with disabilities. The Uniform Federal



Accessibility Standards (UFAS) is the standard against which residential and non-residential spaces are judged to be accessible.

The regulations at 24 CFR 8.26 and HUD PIH Notice 2002-1 describe the obligation of PHAs to provide UFAS-accessible units at each project site and in a sufficient range of bedroom sizes. The intent of requiring the distribution of UFAS-accessible units in a variety of bedroom sizes is to expand housing choice for people with disabilities in the same way that persons without disabilities have housing choice.

The last Section 504 Needs Assessment was conducted by HAPGC in May 1993. HAPGC has demolished three of the six developments assessed in 1993, and no new units have been constructed or added to the inventory. Additionally, federal regulations have been amended to require 2% of units to be accessible to persons with sensory impairments in addition to the 5% of units to be accessible to persons with mobility impairments. Given these changes in both the HAPGC public housing stock and federal requirements, HAPGC should update its Section 504 Needs Assessment to determine if it is in compliance with the minimum 5% and 2% regulations. These minimum requirements should apply to each individual public housing development. Additionally, the Needs Assessment should evaluate the availability of accessible units by bedroom size to ensure that there is a variety of units for various family types who may need accessible units.

To provide accessible housing for tenants with disabilities whose public housing units cannot be physically modified, HAPGC utilizes Section 8 housing choice vouchers.

HAPGC's most recent Section 504 Assessment occurred in 1993 and should be updated to reflect the changes in the Authority's housing stock as well as federal standards.

HAPGC should update its Section 504 Needs Assessment to determine if it is in compliance with regulations requiring that a minimum of 5% of units are accessible to persons with mobility impairments and an additional minimum of 2% of units are accessible to persons with sensory impairments. These minimum requirements should apply to each individual public housing development. Additionally, the Needs Assessment should evaluate the availability of accessible units by bedroom size to ensure that there is a variety of units for various family types who may need accessible units.

5) Admission and Continuing Occupancy Plan (ACOP)

Section 1.0 of the ACOP includes a non-discrimination policy in which HAPGC states its anti-discrimination policy. The list of protected classes includes race, sex, color, age, religion, familial status, disability, and national or ethnic origin. This section also includes a reasonable accommodation/modification policy for persons with disabilities. Such persons will be provided with reasonable accommodations/modifications as long as such accommodations/modifications do not result in an undue financial and/or administrative burden on the Authority. HAPGC offers alternative forms of



communication for persons requiring auxiliary assistance which include sign and foreign language interpretation, oral explanation of materials, large type materials, information on tape, and having someone accompany the applicant to explain materials.

Section 3.0 of the ACOP is a statement on HAPGC's policy on services for non-English speaking applicants and residents, which states that the Authority "will endeavor to have bilingual staff or access to people who speak languages other than English in order to assist non-English speaking families." HAPGC has staff members who are bilingual in Spanish and other foreign languages. In addition, an applicant may identify a family member or other individual who will aid them with all processes involving HAPGC, or the Authority will identify a referral service for the individual to use. Referral services are also provided using Maryland Relay for persons with hearing impairments, and the HAPGC application includes the TDD number.

In Prince George's County, there are over 61,000 persons who speak English less than "very well," two-thirds of whom are native Spanish speakers.

It is recommended that HAPGC determine the need for a Language Access Plan (LAP) in order to comply with Title VI of the Civil Rights Act of 1964.

Sections 7.0 and 8.0 define the Authority's admission procedures. All applicants must qualify as a family. The term "family" is defined as a single person or group of persons with or without children living together and related by blood, marriage, adoption, or affinity. The term "family" includes disabled families (one or more persons disabled), displaced families, unborn children, children in the process of being adopted, children absent from home due to placement in foster care, and live-in aides.

Section 9.0 of the ACOP establishes waiting list preferences. HAPGC's waiting list preferences are (in order):

1. Head of household or co-head has paid employment for at least 30 hours/week.
2. Head of household or co-head is 62 years of age or older.
3. Head of household or co-head qualifies as handicapped/disabled.
4. Head of household or co-head has worked at least 20 hours/week for the past six months, is less than 62 years of age, and is willing to participate in the "Family Resource Academy" Program designed to end reliance on public assistance.
5. Head of household or co-head is in a verified full-time training or educational program with the intent of securing employment within the next twelve (12) months as a result of completing the training or educational program.

In buildings designed for elderly and disabled families, such families will be given preference over other families. Accessible units will be offered first to applicants in need of accessible features.

In Section 21.0 of the ACOP, HAPGC establishes a procedure for residents to present complaints and grievances. Applicants who wish to dispute any management action



must promptly present their grievance, in writing or verbally, to the project office or the HAPGC office. Residents may file a grievance when they feel that a HAPGC action or inaction has adversely affected their rights, duties, welfare or status. For persons with disabilities, reasonable accommodations will be made, including providing interpreters, reading, accessible locations, attendants, and providing notices in an accessible format. The decision of the hearing officer is binding.

b. Section 8 Housing Choice Voucher Program

1) Inventory and Demographics

In March 2011, there were 4,815 Section 8 Housing Choice Vouchers (HCV) administered by HAPGC. Among voucher holders, about two-thirds were families with children and 24% were families with members who had disabilities. An additional 10.2% were elderly households. The racial composition of voucher holders was similar to that of public housing residents, with 96.3% of voucher holders who were Black and 3.5% of voucher holders who were White. Among Section 8 voucher holders, over half (55%) lived in units with three or more bedrooms.

**Figure 4-3
Characteristics of Current Section 8 Voucher Holders, 2010**

	Current Section 8 Voucher Holders	
	# of Households	%
Total Households	4,815	100.0%
Extremely Low Income (<30% MFI)	3,965	82.3%
Very Low Income (>30% but <50% MFI)	729	15.1%
Low Income (>50% but <80 % MFI)	117	2.4%
Families with Children	3,089	64.2%
Elderly Households (1 or 2 persons)	522	10.8%
Individuals/Families with Disabilities	1,158	24.0%
Black Households	4,639	96.3%
White Households	167	3.5%
Asian Households	5	0.1%
Other Race of Households	4	0.1%
Characteristics by Bedroom Size		
0 Bedroom	9	0.2%
1 Bedroom	633	13.1%
2 Bedroom	1,526	31.7%
3 Bedroom	1,871	38.9%
4+ Bedroom	776	16.1%

Note: Percentage may not equal 100% due to rounding and overlap among household types

Source: Prince George's County Housing Authority



2) Waiting List

There were 2,864 applicants for Section 8 vouchers in March 2011. Of these, 8.6% were families with members who had disabilities and 4% were elderly households. Data was not available for families with children.

The greatest demand among applicants was for two-bedroom units, which comprised 42.2% of all applications. One-quarter of applicants were waiting for a one-bedroom units and 32.4% were waiting for units with three or more bedrooms.

Nearly one-third of Section 8 applicants (equivalent to 930 households) were waiting for units with three or more bedrooms.

This suggests a need for affordable rental units that are appropriately sized for larger families. This relative lack of affordable larger rental units disproportionately impacts minority households, who have a tendency to live in larger families.

**Figure 4-4
Characteristics of Section 8 Voucher Applicants, 2010**

	Section 8 Waiting List	
	# of Households	%
Total Households	2,864	100.0%
Extremely Low Income (<30% MFI)	2,477	86.5%
Very Low Income (>30% but <50% MFI)	376	13.1%
Low Income (>50% but <80 % MFI)	9	0.3%
Families with Children	N/A	N/A
Elderly Households (1 or 2 persons)	114	4.0%
Individuals/Families with Disabilities	247	8.6%
Black Households	2,833	98.9%
White Households	22	0.8%
Asian Households	4	0.1%
Other Race of Households	5	0.2%
Characteristics by Bedroom Size		
0 Bedroom	7	0.2%
1 Bedroom	717	25.0%
2 Bedroom	1,210	42.2%
3 Bedroom	757	26.4%
4+ Bedroom	173	6.0%

Note: Percentage may not equal 100% due to rounding and overlap among household types

Source: Prince George's County Housing Authority



3) Section 8 Voucher Portability

Voucher holders have the option of securing housing within Prince George's County or to "port out" to anywhere in the U.S. where the HCV program is administered. As of March 2011, 139 voucher holders had ported out of HAPGC's jurisdiction. Additionally, 246 families have ported into HAPGC's jurisdiction from elsewhere in the country.

Upon their initial interview, voucher holders are provided with an information booklet that outlines their ability to port out of Prince George's County as well as contact information for neighboring housing authorities. The Authority reports that, due to financial constraints, it does not actively promote portability but it provides support to all families requesting to port in or out of the jurisdiction in accordance with HUD regulations.

4) Section 8 Voucher Mobility

Map 9 on the following page shows the location of Section 8 voucher holders and HAPGC public and assisted housing communities. The majority of voucher holders in the Urban County reside within the Capital Beltway. However, a significant proportion of voucher holders also live in non-impacted areas beyond the Beltway, including the central-southern portions of the County such as the Kent, Oxon Hill, Surratts, and Marlboro and the northern communities surrounding Laurel. According to Section 8 program staff, the high number of foreclosed properties east of the Capital Beltway provides voucher holders with greater housing choice.

Within Bowie, the majority of voucher holders are scattered throughout the City. Only a handful of voucher holders reside in impacted areas.

5) Section 8 Landlords

It is the policy of HAPGC to encourage the participation of landlords representing units outside of areas of minority and LMI concentration (i.e. impacted areas). HAPGC is also willing to contact landlords to confirm the availability of units outside of impacted areas, if it is requested by prospective tenants.

6) Persons with Disabilities

Households with members who have disabilities comprise nearly one-quarter of Section 8 voucher holders, as discussed earlier. HAPGC maintains a list of known accessible units and Rental Specialists will inform families if a unit with modifications becomes available. The Authority states that when a voucher holder indicates that they are disabled and in need of a reasonable accommodation, HAPGC will provide services such as sign-language interpreters, Braille or TTY services.

7) Section 8 Housing Choice Voucher Administrative Plan

Chapter 2, Part I of the Section 8 Administrative Plan includes a fair housing policy in which HAPGC states its anti-discrimination policy. The list of protected classes includes race, color, religion, sex, national origin, age, familial status, and disability.

HAPGC's policy relative to reasonable accommodations is set forth in Chapter 2, Part II of the Plan. Participants with a disability must request a special accommodation in order to be treated differently than other non-disabled voucher holders or applicants. HAPGC has a request form for this purpose, though a formal written request is not necessary. In order to be considered as a person with a disability, the person must be



verified by HAPGC and reliable, knowledgeable, and professional representatives as meeting the federal definition of disability as per 24 CFR Parts 8.3 and 100.201.

HAPGC's policy relative to persons with limited English proficiency (LEP) is stated in Chapter 2, Part III. HAPGC will consider providing accessibility to persons with LEP on the basis of a cost-benefit analysis. In cases where fewer than 50 persons speak a particular foreign language, HAPGC will provide written notice in the primary language of the LEP language group of the right to receive free, competent, oral interpretation of written materials.

In Chapter 3, Part III.G. of the Plan, HAPGC states that it will not deny Section 8 vouchers on the basis that the applicant is or has been a victim of domestic violence, dating violence, or stalking. In this section, HAPGC states its policy to keep confidential any information provided by victims of domestic violence, dating violence, or stalking. HAPGC will release such information only in limited circumstances, such as when the victim authorizes the release, used as part of an eviction proceeding, or otherwise required by law to be released.

In order to be eligible to receive a Section 8 Housing Choice Voucher, the applicant must qualify as a "family." In Chapter 3, Part I of the Administrative Plan, HAPGC defines "family" as a single person or a group of persons consisting of a family with one or more children, two or more elderly or disabled persons living together, one or more elderly or disabled persons living with one or more live-in aides. A single elderly, displaced, disabled, or any other single person qualifies as a family. A family also includes two or more individuals who are not related by blood, marriage, adoption, or other operation of law but can demonstrate that they have lived together previously.

In Chapter 4, Part III, HAPGC establishes a waiting list preference for applicants who live, work, or have been hired to work in Prince George's County. The order of preferences is as follows:

- Displaced by government action;
- Head of household or co-head (Spouse or Significant Other) has paid employment of 30 hours or more per week, is 62 years of age or older, or qualifies as disabled;
- Any member of the household qualifies as disabled;
- Head of household or co-head is in a full time training or educational program with the intent of securing related employment within a year of program completion; and
- Household has successfully completed a transitional housing program under the County's Continuum of Care Program.

Any applicant or participant who feels that he or she has been impacted negatively by a HAPGC decision may request an informal review (applicants) or informal hearing by HAPGC staff. HAPGC must always provide the opportunity for an informal review before denying or terminating Section 8 assistance. A notice of the findings of the informal review is provided to the applicant or participant in writing.

In Chapter 13, Part I of the Section 8 Administrative Plan, HAPGC states its commitment to encouraging the participation of landlords in all areas of the County. HAPGC has established an official policy of actively recruiting property owners with rental units located outside areas of poverty and minority concentration. This outreach involves distribution of printed material to owners and managers, contacting owners and



managers by phone or in person, holding owner recruitment/information meetings at least annually, participating in community-based organizations comprised of owners and managers, and developing working relationships with owners and real estate broker associations.

Chapter 10, Part II of the Administrative Plan states that HAPGC permits program participants to “port out” to other jurisdictions. This provision contributes to the goal of deconcentration of poverty when voucher holders are able to secure housing outside of impacted areas of minorities and LMI persons.

Chapter 16, Part II states that HAPGC will consider a payment standard higher than its typical payment standard when a reasonable accommodation is required for a family that includes a person with a disability.

ii. Policies Governing Investment of Entitlement Funds

From a budgetary standpoint, housing choice can be affected by the allocation of staff and financial resources to housing related programs and initiatives. The decline in federal funding opportunities for affordable housing for lower income households has shifted much of the challenge of affordable housing production to state, county and local government decision makers.

The recent Westchester County, NY, fair housing settlement also reinforces the importance of expanding housing choice in non-impacted areas (i.e., areas outside of concentrations of minority and LMI persons). Westchester County violated its cooperation agreements with local units of government which prohibit the expenditure of CDBG funds for activities in communities that do not affirmatively further fair housing within their jurisdiction or otherwise impede the Urban County’s action to comply with its fair housing certifications. As entitlement communities, both the Urban County and the City of Bowie have obligations to affirmatively further fair housing by expanding housing choice outside of impacted areas.

Annually, Prince George’s County is required to submit signed Non-State Grantee Certifications along with its Annual Action Plan to HUD. “Affirmatively Further Fair Housing” is a part of the applicable statutes and the regulations governing the consolidated plan regulations. The jurisdiction certifies that it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through the analysis, and maintain records reflecting that analysis and actions in this regard.

The County identifies the proposed actions it will undertake to address the impediments in its Annual Action Plan, and then reports on the progress of its actions in its end-of-the-year Consolidated Annual Performance and Evaluation Report (CAPER). In addition, as part of the CDBG Operating Agreements, each sub-recipient agrees to permit the County to monitor its performance for compliance with all federal laws and regulations. As part of the DHCD monitoring visits, sub-recipients are affected by fair housing requirements found at 24 CFR Part 1, 3 and 8, the fair housing and non-discrimination provisions.

HUD entitlement funds may be used for a variety of activities to serve a variety of goals, as follows:

- Community Development Block Grant (CDBG): The primary objective of this program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of LMI levels. Funds can be used for a wide array of activities, including: housing rehabilitation, homeownership assistance, lead-based paint detection and removal, construction or rehabilitation of public facilities and infrastructure, removal of



architectural barriers, public services, rehabilitation of commercial or industrial buildings, and loans or grants to businesses.

- HOME Investment Partnership Program (HOME): The HOME program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for low and moderate income households. HOME funds can be used for activities that promote affordable rental housing and homeownership by low and moderate income households, including reconstruction, moderate or substantial rehabilitation, homebuyer assistance, and tenant-based rental assistance.
- Emergency Shelter Grant (ESG): A federal grant program designed to help improve the quality of existing emergency shelters for the homeless, to make available additional shelters, to meet the costs of operating shelters, to provide essential social services to homeless individuals, and to help prevent homelessness.
- Housing Opportunities for Persons with AIDS (HOPWA): A federal grant program that provides housing assistance and related supportive services for programs targeted towards persons living with AIDS. HOPWA funds may be used for a wide range of housing, social services, program planning, and development costs. These include, but are not limited to, the acquisition, rehabilitation, or new construction of housing units; costs for facility operations; rental assistance; and short-term payments to prevent homelessness. HOPWA funds also may be used for health care and mental health services, chemical dependency treatment, nutritional services, case management, assistance with daily living, and other supportive services.

The Urban County is a recipient of CDBG, HOME, ESG, and HOPWA funds, while the City of Bowie receives CDBG funds.

a. Allocation of funds

1) Urban County

In developing its Consolidated Plan (Con Plan), the Urban County established a work group composed of key program staff from various County and State agencies. To identify and prioritize community needs, the Work Group hosted several focus groups, including ones devoted to senior citizen housing, homelessness, community development, and general housing. The Con Plan outlines five strategies to address the needs of the County between FY2011 and FY2015, including:

- Targeted homeownership opportunities to first time homebuyers. This will support the ongoing efforts being made with HUD's Neighborhood Stabilization Program funds (NSP). Tied to this priority is the County effort to market and meet "ENERGY STAR" requirements and green development standards.
- Provide environmentally sound quality affordable rental housing opportunities to low and moderate income households through the acquisition and rehabilitation of existing properties or the construction of new rental units. Rehabilitate units will meet "ENERGY STAR" standards.
- Provide assisted rental housing assistance and opportunities (rental subsidies) to low income elderly; families; homeless persons and others with special needs.

Urban County of Prince George's County and the City of Bowie



- Promote supportive services and facilities for the frail elderly, disable persons, low income families whom may be renters, and other special needs persons or groups.
- Promote and participate in the local Continuum of Care for the County in order to effectively transition persons whom are homeless to appropriate permanent housing.
- Provide multifamily and single family rehabilitation assistance or weatherization assistance to low and moderate income persons whether they are owner or renter. The focus will be principally on the 16 targeted areas to undertake as much as possible comprehensive revitalization.

These strategies are the foundation on which the County develops its annual goals and funding strategies. In survey responses, County staff indicated that protected classes including seniors, minorities, persons with disabilities, and families are all considered targeted groups for funding.

The County's Community Planning and Development (CPD) Division notifies the general public when CDBG funds are available and solicits applications from qualified applicants. To qualify, an applicant must demonstrate that it is:

- A local government agency or municipality;
- A non-profit organization with 501(c)(3) status;
- Currently providing services to LMI residents in the County;
- A valid entity created and in "good standing" with the State of Maryland;
- Currently covered by insurance in accordance with the County's policies; and
- Has clearly demonstrated its capacity to implement its proposed program and the ability to disburse CDBG funds within the designated time period.

Applications are reviewed by CPD staff to assure that the propose projects are in compliance with HUD requirements, that each applicant can carry out its proposed project, and that projects will have a greater impact in benefitting LMI persons.

Staff should also be reviewing funding requests from units of local government with a keen eye toward fair housing policy. When the Urban County awards entitlement funds to a unit of local government, the obligation to affirmatively further fair housing goes with the funds to the municipality. For this reason, the Urban County has an obligation to verify that a subrecipient municipality is not impeding fair housing choice. For example, if a rezoning request is denied by a municipality because neighboring property owners object to rental family housing, the Urban County should refrain from awarding any HUD entitlement funds to the municipality until the impediment to fair housing choice is eliminated. Otherwise, the Urban County could be held responsible for not affirmatively furthering fair housing.



The Urban County should amend its application review process for units of local government to include a degree of due diligence relative to fair housing.

The Urban County should, for example, review the zoning ordinance of any municipality for which CDBG or HOME funding is requested. If discriminatory provisions are identified in the ordinance, the Urban County should not approve entitlement funding until the impediment to fair housing choice is eliminated.

HOME funds are generally utilized to enhance the financial feasibility of the construction of multi-family units, and applications are accepted on a rolling basis. Applications are reviewed by County staff based on the following criteria:

- Consistency with Con Plan and AP goals,
- Leveraging of other private and public funds,
- The number of affordable units to be produced,
- Readiness of the proposed project,
- Capacity of the proposed project's development team,
- Councilmember and community support, and
- Project's impact on the surrounding community.

Throughout the interview process for the AI, it became apparent that funding decisions for new housing projects were made at the executive level in the Urban County. Applications for CDBG and HOME funding requests are processed and reviewed by DHCD staff, but their recommendations on which projects to fund are generally not considered. DHCD staff, particularly those who have long-term institutional knowledge of federal and state regulations, statutes, and policies are an invaluable asset to the County. Their recommendations should be seriously considered, and approved by the County Council except in extraordinary circumstances. This policy, if implemented consistently, would remove politics from the decision-making process, ensure funds were spent in a timely manner and by competent entities, and expand fair housing choice for members of the protected classes.



The Urban County should make affirmatively furthering fair housing the over-arching goal of all HOME-assisted activities.

Priority should be given to new multi-family rental housing projects proposed in non-impacted areas. The County should increase the per-unit subsidy to provide more incentives to developers to seek project sites outside of impacted areas.

The Urban County should reconsider requiring the support of elected officials and the community for new affordable housing projects.

If such support is not required or sought for market-rate multi-family housing developments, then it should not be required for affordable housing developments. The only difference between the two is the source of financing, and public financing is typically used to develop housing for members of the protected classes (i.e., families, persons with disabilities, etc.) This policy is discriminatory. The local land use approval process should be the sole factor in determining the need for public notification or support.

2) City of Bowie

The City of Bowie has prioritized senior housing rehabilitation for fiscal years 2010 to 2012, given its aging population. Applications are distributed to the City's residents and evaluated based on need.

b. Geographic Distribution of Activities

1) Urban County

Federal funds are focused in the Urban County's areas of minority concentration and concentrations of LMI persons. Most of these areas are located within the Capital Beltway near the border with Washington D.C.

The Urban County targets the revitalization and redevelopment of LMI and minority neighborhoods.

Although these impacted areas need investment to improve the quality of life for residents, the Urban County must strive to seek a balance with investing in non-impacted areas. Affirmatively furthering fair housing involves expanding housing choice for members of the protected classes to non-impacted areas of Prince George's County.

Urban County of Prince George's County and the City of Bowie



2) City of Bowie

Given its aging population, in its FY2009 to FY2013 Consolidated Plan the City determined that housing rehabilitation for senior citizens is the highest priority for its CDBG program. Project activities are dispersed throughout the City.

c. Annual Plans and CAPERS

Entitlement communities are required to prepare Five-Year Consolidated Plans (Con Plans) and an Annual Plan (AAP) in which each entity describes the activities to be undertaken with CDBG, HOME, and ESG funds. At the end of each fiscal year, a Consolidated Annual Performance and Evaluation Report (CAPER) is then developed to report on the progress achieved by each entitlement in its efforts to invest CDBG, HOME, ESG and/or HOPWA funds and affirmatively further fair housing. The following narrative includes an analysis of how the Urban County and the City of Bowie have affirmatively furthered fair housing through its investment of federal funds.

1) Urban County

The CAPER for FY2010 and AAP for FY2011 were reviewed for this AI. In FY2010, the County received \$6.3 million in CDBG funds, \$3.4 million in HOME funds, \$269,322 in ESG funds, and \$3.3 million in HOPWA funds. Funds were used to support a large variety of programs that contributed to the County's five year goals. Housing-related goals included:

- Stabilize and increase homeownership opportunities
- Support development of new and existing affordable rental properties
- Provide housing subsidies
- Support the County's Continuum of Care goal of ending chronic and non-chronic homelessness by 2012
- Assist in the provision of housing options for persons with special needs, and
- Improve the quality of life by providing needed public services.

In its Five Year Plan for FY2006-2010, the County established a goal of assisting over 12,000 households with unmet housing needs. By FY2010, the County had succeeded in assisting 11,948 households, or 99% of its goal. Assistance programs included rehabilitation programs; down payment assistance; trainings on fair housing, financial literacy, predatory lending, and foreclosure prevention; and rental assistance. The CAPER does not include a map of where these activities occurred.

In its FY2011 AAP, the County outlined three priorities for its federally-assisted programs, including:

- To stabilize and increase housing opportunities for 1,279 LMI households, homeless individuals and families, persons at risk of becoming homeless, and non-homeless persons with special needs,
- To improve the safety and livability of neighborhoods for principally 51,303 LMI persons, and

Urban County of Prince George's County and the City of Bowie



- To support employment opportunities for LMI persons, small businesses, and community revitalization activities by creating and/or retaining 46 jobs and assisting 305 small businesses.

Similar to its FY2010 CAPER, the County did not include a map of where its federally-assisted housing activities would occur, although the plan does state the resources will be directed to areas of minority concentration and concentrations of LMI persons. As stated previously, the County should strive to strike a balance between revitalization of impacted areas and the creation of new affordable housing opportunities in non-impacted areas.

The County partners with the Prince George's County Human Relations Commission (HRC) to operate a Fair Housing and Equal Opportunity (FHEO) Program. HRC investigates and conciliates discrimination complaints and maintains data regarding complaints filed. HRC also conducts Fair Housing education and outreach activities. In FY2011, the County allocated \$100,000 in CDBG funds for its FHEO program and another \$100,000 to fund the preparation of an Analysis of Impediments to Fair Housing Choice. The County also states that it will continue to address impediments to fair housing choice that were identified in its previous AI, as well as to amend its most current Five Year Plan to reflect the findings of this AI. Furthermore, the DHCD will continue to assess future funding for fair housing activities and make recommendations for funding allocations for education, outreach, enforcement and testing.

2) City of Bowie

The Annual Plans for FY2010 to FY2012 were analyzed for this AI, as well as the CAPERs for FY2009 and FY2010.

In FY2009, the primary activity in the City was infrastructure improvement, including completing the engineering design for 5th Street improvements, including paving, curb and gutter installations, sidewalk construction, and stormwater management system; allocating funding for the implementation of the Master Plan for the Redevelopment of Old Town Bowie; and installing street amenities in Old Town Bowie in order to enhance safety and encourage pedestrian traffic.

In fiscal years 2010 to 2012, the City's AAPs stated it will focus federal funds on its Senior Citizen "Green" Housing Rehabilitation program.

In terms of fair housing, the City does not allocate CDBG funds specifically for fair housing activities. In its FY2011 CAPER, the City notes that it includes information on housing policies and fair housing law on its website, but a review of the City's site showed that the link was not functioning as of May 2011. When residents inquire about housing issues, City staff refers them to local services providers.

In FY2010, the City's CDBG entitlement was \$174,744; however, none of this grant was allocated for fair housing activities.

Although Bowie's CDBG entitlement is small, the City has an obligation to affirmatively further fair housing. Allocating 1% of its annual fair housing activities, equivalent to approximately \$1,700, would enable the City to implement worthwhile activities such as fair housing education and outreach.

d. Affirmative Marketing Policy

As a recipient of CDBG and HOME funds, both the Urban County and the City are required to adopt affirmative marketing procedures and requirements for all CDBG- and HOME-assisted housing with five or more units. Such a plan must include:

- Methods of informing the public, owners and potential tenants about fair housing laws and the Urban County's and the City's policies,
- A description of what the owners and/or the Urban County and the City will do to affirmatively market housing assisted with CDBG or HOME funds,
- A description of what the owners and/or the Urban County and the City will do to inform persons not likely to apply for housing without special outreach,
- Maintenance of records to document actions taken to affirmatively market CDBG- and HOME-assisted units and to assess marketing effectiveness, and
- A description of how efforts will be assessed and what corrective actions will be taken where requirements are not met.

Recipients of CDBG and HOME funds are required to comply with the affirmative marketing requirements found at 24 CFR Part 108. Any CDBG- or HOME-assisted project consisting of five or more dwelling units is subject to these regulations. Affirmative marketing is a marketing strategy designed to attract renters and buyers who are least likely to apply for the assisted housing in order to make them aware of available affordable housing opportunities.

Many HUD entitlements require project applicants and owners to complete HUD Form 935.2 in which their proposed marketing initiatives can be described. However, simply requiring the completion of this standardized form does not fulfill all of the entitlement's affirmative marketing obligations. A written policy is needed in which the following issues can be addressed:

- A pre-occupancy conference with the project owner,
- The ways in which the affirmative marketing activities will be monitored for compliance,
- Actions to be taken for non-compliance,
- How compliance with the affirmative marketing plan will be determined,
- How complaints alleging violations of the federal regulations or affirmative marketing plan will be handled, and
- What sanctions, if any, will be enforced by the jurisdictions for non-compliance.

Urban County of Prince George's County and the City of Bowie



1) Urban County

Survey responses from County staff indicate that the County follows HUD's required affirmative marketing policies and procedures for HOME-assisted projects. The County requires property owners, developers, and non-profits to include fair housing symbols in their advertisements and publications; post fair housing signs; provide verbal and written instructions to employees; and information applicants on DHCD's waiting list of available properties and vacancies. Additionally, the County includes special outreach methods for persons who may be less likely to apply for units. Outreach methods include contacting religious groups, employment centers, housing counseling and referral agencies, social service organizations, and organizations serving persons with disabilities. County staff did not describe outreach strategies used to reach persons with LEP.

No information was provided.

If the Urban County does not have an Affirmative Marketing Policy, it must prepare one for its HOME Program.

Such a policy requires developers to advertise the availability of rental units assisted with HOME funds to persons who are least likely to apply for them.

2) City of Bowie

The City of Bowie uses its small CDBG annual entitlement of \$174,744 to carry out rehab activities for elderly homeowners. This activity would not trigger the affirmative marketing requirements.

e. **Site and Neighborhood Standards Policy**

Recipients of HOME funds are required to administer their program in compliance with the regulations found at 24 CFR 983.6(b), known as the Site and Neighborhood Standards. These standards address the site location requirements for both rehabilitated and newly constructed rental units financed with HOME funds.

Site selection for HOME-assisted rehabilitated units must comply with several standards, including among other things, promoting greater choice of housing opportunities and avoiding undue concentration of assisted persons in areas containing a high concentration of LMI persons. For new construction, an additional standard is added. With few exceptions, site selection for new construction must include a location that is not in an area of minority concentration.

The County has drafted a Site and Neighborhood Standard policy for inclusion in its Policy and Procedures Manual.

iii. **Appointed Boards and Commissions**

A community's sensitivity to fair housing issues is often determined by people in positions of public leadership. The perception of housing needs and the intensity of a community's commitment to housing related goals and objectives are often measured by board members,

Urban County of Prince George's County and the City of Bowie



directorships and the extent to which these individuals relate within an organized framework of agencies, groups, and individuals involved in housing matters. The expansion of fair housing choice requires a team effort and public leadership and commitment is a prerequisite to strategic action.

a. **Prince George's County Human Relations Commission**

The Human Relations Commission (HRC) is a 13-member body appointed by the County Executive and approved by the Council. The Commission is the agency empowered to enforce all violations of the County's civil rights laws, and in certain instances, federal civil rights laws as well. Members of the HRC should be representative of the County and attempts have been made within the last year to diversify the Commission. Presently, the Commission has members representing a broad cross section of the County including new citizens, Blacks, Hispanics, Whites, persons with disabilities, labor, business, females, males and seniors.

The Commission currently has seven members with a full complement expected by the end of 2012. The mission of the HRC is to provide residents, businesses and visitors with an efficient and cost effective administrative alternative for investigating, mediating and adjudicating complaints of unlawful discrimination in the areas of housing, employment, public accommodation, education, law enforcement abuse, real estate and financial lending. The stated vision of the HRC is that it is committed to the development of Prince George's County as a great place to live, work and play; where all are free to pursue their talents and dreams unhindered by bias, misunderstanding and conflict based on race, religion, color, gender national origin, age, occupation, marital status, political opinion, personal appearance, sexual orientation, disability, or familial status.

An appointed Executive Director manages the HRC staff, which supports the Commission by conducting independent investigations and mediations of complaints, and assisting the Commission in conducting fair public hearings to adjudicate complaints. The Commission has full authority to award money damages up to \$100,000, issue cease and desist orders, subpoenas and award other equitable relief in order to stop unlawful discrimination. Although the HRC does not have FHAP status with the Department of Housing and Urban Development, the HRC does investigate and enforce county laws against unlawful discrimination in housing and financial lending. HRC is seeking to partner with the Maryland Commission for Civil Rights, the only FHAP agency in Maryland, to investigate and resolve violations of federal housing laws for citizens of Prince George's County.

Demographic data on the members was not available.

b. **Prince George's People's Zoning Counsel**

No information was provided.

c. **Prince George's County Housing Authority Board of Directors**

HAPGC's Board of Directors is a seven-member body responsible for the oversight of the activities and operations of the Housing Authority.

Of the Boards seven members, all are Black. There are five females and two males. One has a disability.

d. Prince George’s County Planning Commission

The Planning Commission is a five-member body that directs the work of the Maryland-National Capital Park and Planning Commission (M-NCPPC) through the Prince George’s County Planning Department and the Prince George’s County Department of Parks and Recreation. M-NCPPC’s activities in the County are determined by the Prince George’s County Council, which annually approves the operating budget and work program, with input and comments from the County Executive.

Of the Commission’s five members, four are male and one is female. Three members are Black and two are White.

e. Prince George’s County Fair Housing Community Outreach Committee

No information was provided.

f. Bowie Advisory Planning Board

The Advisory Planning Board advises the City Council on matters relating to land use annexation, zoning changes, site plan review, and other matters affecting development in and around the City of Bowie. The Board also hears petitions for variances and departures from the Zoning Ordinance.

The Bowie Advisory Planning Board is comprised of nine members. Five members are male and four are female. Four members are White and five are Black.

**Figure 4-5
Board and Commission Appointments in the Urban County, 2011**



Although demographic information for several County boards and commissions dealing with housing and housing-related issues was not provided, it is apparent from Figure 4-5 that there are lower rates of females, Hispanics and persons with disabilities than are present in the general



population. For instance, Hispanics comprise 16% of the Urban County population but do not appear to sit on any appointed boards or commissions.

The Urban County should maintain records of the demographic characteristics of residents appointed to boards and commissions dealing with housing and housing-related issues.

Such a practice would ensure that members of the protected classes are represented proportionally to their share of the general population.

iv. Accessibility of Residential Dwelling Units

From a regulatory standpoint, local government measures define the range and density of housing resources that can be introduced in a community. Housing quality standards are enforced through the local building code and inspections procedures.

a. Private Housing Stock

The Maryland Accessibility Code requires accessibility for persons with disabilities in certain new and rehabilitated residential and commercial property.²¹ In 2004, the Department of Justice certified that Maryland's state code met or exceeded federal standards for accessible design. Prince George's County has adopted the state Accessibility Code as well as the 2006 International Building Code. In its enforcement activity, the Department of Environmental Resources ensures that ADA requirements described on approved building plans are constructed properly.

As a HOME entitlement, the County complies with 24 CFR Part 8 which implements Section 504 of the Rehabilitation Act of 1973. Multi-family development must comply with 24 CFR 100.204, which implements the Fair Housing Act construction requirements. To address the needs of persons with mobility impairments, a minimum of 5% of all units (or at least one unit, whichever is greater) must comply with the Uniform Federal Accessibility Standards (UFAS) required under Section 504. An additional 2% of units (or at least one unit) are required to be accessible for individuals with hearing or vision impairments.

b. Public Housing Stock

As stated earlier, HAPGC's last Section 504 Needs Assessment was conducted in May 1993. HAPGC should update its Section 504 Needs Assessment to determine if it is in compliance with the minimum 5% and 2% requirements for accessible units. This regulation should apply to each individual public housing development and by bedroom size to ensure that there is a variety of units for various family types who may need accessible units.

²¹ Department of Housing and Community Development: Building and Material Codes, Chapter 2. Article §2-111 and 3-103; Public Safety Article, §12-202; Annotated Code of Maryland



The DHCD has a working relationship with the County's ADA Coordinator and conducts monthly seminars for landlords and owners who participate in the Housing Authority of Prince George's County Housing Choice Voucher Program. Training is provided by certified Housing Quality Standards (HQS) staff and includes standards on HUD HQS, housing accessibility and compliance. All units are required to pass the HQS inspection and be licensed before leasing. HAPGC may reject any landlord or owner with a history of violating HQS or applicable housing standards. In addition, landlords and owners will not be approved if HAPGC has been informed of sanctions and equal opportunity proceedings.

v. Persons with Limited English Proficiency (LEP)

The Urban County has adopted a Language Access Plan (LAP) to enhance services offered to persons with LEP.

No information was provided.

If the Urban County does not have a Language Access Plan, it must conduct the four-factor analysis to determine the need for such a plan.

A Language Access Plan will ensure that persons with limited English proficiency have access to County programs and services.

vi. Comprehensive Planning

A community's comprehensive plan is a statement of policies relative to future development and the preservation of existing assets. In Prince George's County, the Maryland-National Capital Park and Planning Commission (MNCPPC) has planning authority. Of the 27 incorporated municipalities in the County, only the City of Laura has its own planning and zoning authority.

Two plans were reviewed for this AI: Prince George's County General Plan and the Bowie and Vicinity Approved Master Plan.

a. Prince George's County General Plan

The County's General Plan was adopted in 2002. The Plan delineates three Tiers within the County:

1. **Developed Tier:** Comprises an 86 square mile area located between the County's boundary with Washington DC and the Capital Beltway. The Developed Tier contains more than half of the County's households and just less than half of its jobs. The area is marked by its medium- and high-density developments (including three-quarters of the County's multi-family developments) and greater access to non-motorized and mass transit opportunities.
2. **Developing Tier:** Comprising 237 square miles, this Tier represents the largest area within the County where the most recent development has been occurring. The Developing Tier contains about half of the County's households and half its jobs. Given its recent suburbanization, the Developing Tier is characterized by

Urban County of Prince George's County and the City of Bowie



low-density residential subdivisions, farmland, employment parks, and automobile-oriented commercial centers. Mass transit opportunities are more limited and automobile dependence has resulted in increased congestions on the Tier's roadways.

3. **Rural Tier:** The Rural Tier comprises 150 square miles in the eastern and southern reaches of the County. Development activities are limited to mining and widely-dispersed, large-lot homes. Mass transit is not available, and the development goals in this Tier revolve around preservation of sensitive environmental resources and the maintenance of the areas rural and agricultural character.

Additionally, the Plan highlights 26 Centers of current or anticipated concentrated developments that take advantage of high-capacity mass transit hubs, and seven Corridors where more intensive development should be encouraged.

Housing, development, and transportation goals for the three Tiers vary, but on the whole, the County has established four housing objectives:

- Increase average home value in the County
- Increase opportunities for higher-density multi-family dwellings in Centers and Corridors.
- Reduce high concentrations of distressed, low-income rental units by 30% by 2025.
- Increase the percentage of mixed-use development so that one in ten new dwellings is located in mixed-use developments by 2005, two in ten new dwellings by 2015, and three in ten by 2025.

Promoting high-value homes in the County is rationalized as a means to increase the County's tax base as well as to provide "move-up" opportunities for the County's residents. One of the policy recommendations of the Plan is to "ensure quality housing for all price ranges while encouraging development of a variety of high-value housing." However, the Plan focuses on the development of retirement and senior housing, and it does not place an emphasis on the maintenance or promotion of family households for low- to moderate-income households. Similarly, while the goal of reducing distressed, low-income rental housing can be a means to improve the housing stock of affordable units if the units are replaced with new or rehabilitated, low-income units, it may also contribute to the loss of affordable units. The Plan does not specifically state a goal to maintain or increase the number of affordable rental units. Furthermore, the County does not explicitly state a fair housing objective in its housing strategy.

Notably, there is no Housing Element in the County's General Plan. Rather, housing goals are included with land use goals. However, to convey the significance of its policy to affirmatively further fair housing, the General Plan should incorporate a Housing Element. Within this section of the Plan, the County should strive to define the location of jobs held by lower wage employees and analyze the location of affordable housing within the context of public transit routes. The stated goal should be to expand the supply of affordable housing that is within proximity to entry-level and/or lower-skill jobs.

The County's General Plan has specific goals to increase average housing value as well as to reduce the number of distressed, low-income rental units.

However, the Plan lacks a detailed Housing Element. By increasing its tax base and decreasing the number of distressed and dilapidated rental units, the County has the potential to increase the quality of its housing stock. However, without an explicit goal to maintain and preserve the affordable rental housing stock for families, these policies may result in increasingly unaffordable rental and owner housing stocks for lower-income households. Furthermore, there is no policy indicating how the County will deconcentrate areas of low-income rental units. Ideally, these issues should be adequately addressed in a Housing Element of the General Plan in the context of the critical linkages between affordable housing, public transit routes/stops, and entry-level employment opportunities.

b. City of Bowie Development Review Guidelines and Policies

Major land use, zoning, subdivision, and site plan decisions in the City of Bowie are overseen by Prince George's County, per Maryland's Regional District Act. Since 1989, the City has also maintained a Development Policies document, which details the City's goals in guiding growth and development. The most recent Development Review Guidelines and Policies document was adopted in 2005.

A significant portion of the City's Development Review document is devoted to site design guidelines. Included in the City's residential design guidelines for new developments is a statement to encourage buildings in new residential developments to provide units that are single story or include a first floor master bedroom, to serve the needs of the City's elderly population and persons with disabilities.

The Development Review document also includes specific housing goals, including:

1. Preserving and enhancing the quality of the residential character of the City by maintaining a majority of single-family, detached dwellings and balancing it with a choice of housing types, sizes and styles, including live-work dwelling units and housing for residents of all ages and incomes and for populations with special needs;
2. Expanding housing opportunities for senior citizens and persons with disabilities to include mixed retirement communities, assisted living facilities, nursing homes and congregate care facilities; and
3. Encouraging housing opportunities for moderately low, low, and very low-income families, as defined by the City's Consolidated Housing Plan.

vii. Zoning

The analysis of zoning regulations was based on the following five topics raised in HUD's Fair Housing Planning Guide, which include:

- The opportunity to develop various housing types (including apartments and housing at various densities)

Urban County of Prince George's County and the City of Bowie



- The opportunity to develop alternative designs (such as cluster developments, planned residential developments, inclusionary zoning and transit-oriented developments)
- Minimum lot size requirements
- Dispersal requirements and regulatory provisions for housing facilities for persons with disabilities (i.e. group homes) in single family zoning districts
- Restrictions on the number of unrelated persons in dwelling units.

The Prince George's County Planning Commission (PGCPD) has zoning authority for the entire County except for the City of Laurel. Therefore, the County's zoning ordinance also applies in the City of Bowie.

a. Date of Ordinance

Generally speaking, the older a zoning ordinance, the less effective it will be. Older zoning ordinances have not evolved to address changing land uses, lifestyles, and demographics. However, the age of the zoning ordinance does not necessarily mean that the regulations impede housing choice by members of the protected classes.

In 2009, PGCPD initiated a series of public meetings to update the Zoning Ordinance and Subdivision Regulations. However, this process has been delayed due to budgetary constraints.

b. Residential Zoning Districts, Permitted Dwelling Types & Minimum Lot Sizes

The number of residential zoning districts is not as significant as the characteristics of each district, including permitted land uses, minimum lot sizes, and the range of permitted housing types. However, the number of residential zoning districts is indicative of the municipality's desire to promote and provide a diverse housing stock for different types of households at a wide range of income levels.

Because members of the protected classes are often also in low-income households, a lack of affordable housing may impede housing choice by members of the protected classes. Excessively large lot sizes may deter development of affordable housing. A balance should be struck between areas with larger lots and those for smaller lots that will more easily support creation of affordable housing. Finally, the cost of land is an important factor in assessing affordable housing opportunities. Although small lot sizes of 10,000 square feet or less may be permitted, if the cost to acquire such a lot is prohibitively expensive, then new affordable housing opportunities may be severely limited, if not non-existent.

The County has 17 residential zoning districts, with lot sizes varying from 1,500 square feet for two-family dwellings in multi-family districts to 20 acres in the County's rural R-O-S district. In single-family, non-rural districts, including R-80, R-55, R-35, and R-20, required lot sizes range from 2,000 to 9,500 square feet. These minimum requirements are small enough to allow for a variety of housing types.

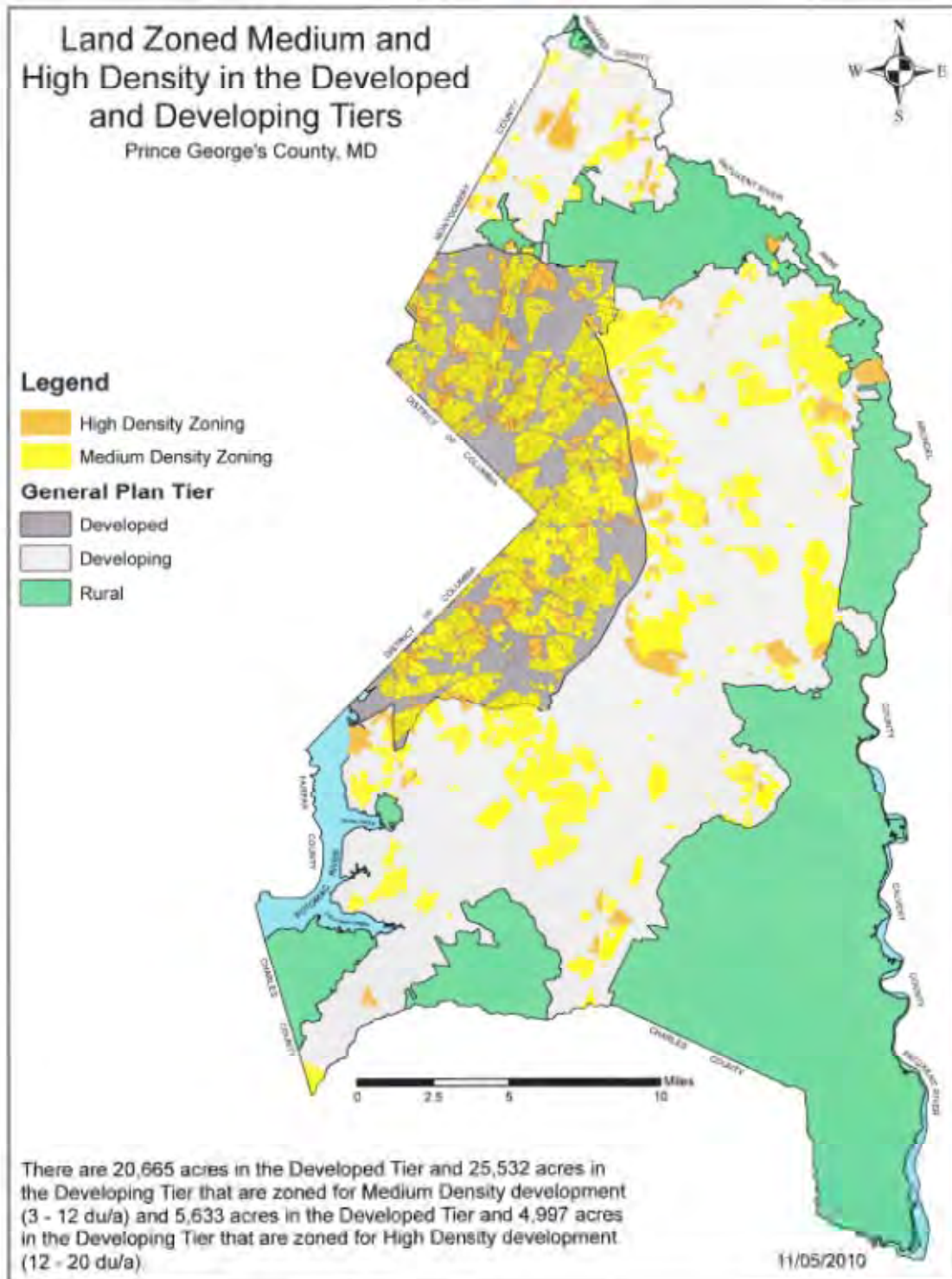
**Figure 4-6
Residential Zoning Districts**

Residential Zoning Districts	Principal residential uses	Minimum Lot Size	Maximum Density (dwellings per net acre)
R-O-S	Reserved Open Space	20 acres	0.05
O-S	Open Space	5 acres	0.2
R-A	Residential - Agriculture	2 acres	0.5
R-E	Residential - Estate	40,000 sq. ft.	1.08
R-R	Rural Residential	20,000 sq. ft. (15,000 if prior to	2.17
R-80	Single-Family Detached	9,500 sq. ft.	4.5
R-55	Single-Family Detached	6,500 sq. ft.	6.7
R-35	Single-Family Semidetached, Two-Family Detached	3,500 sq. ft. for single-family 7,000 sq. ft. for two-family	12.44
R-20	Single-Family Triple-Attached	3,200 sq. ft. for end lots 2,000 sq. ft. for townhouses	16.33
R-T	Townhouse	1,800 sq. ft.	9 three-family 8 two family 6 other dwellings
R-30	Multi-Family Low Density	14,000 sq. ft. for garden apartments 1,500 sq. ft. for two-family 1,800 sq. ft. for other	10 garden apartments 9 three-family 8 two family 6 other dwellings
R-30C	Multi-Family Low Density Condominium	14,000 sq. ft. for garden apartments 1,500 sq. ft. for two-family 1,800 sq. ft. for other	12 garden apartments 9 three-family 8 two family 6 other dwellings
R-18	Multi-Family Medium Density	16,000 sq. ft. for apartments 1,500 sq. ft. for two-family 1,800 sq. ft. for other	12 garden apartments 20 mid-rise apartments 9 three-family 8 two family 6 other dwellings
R-18C	Multi-Family Medium Density Condominium	1 acre for apartments 1,500 sq. ft. for two-family 1,800 sq. ft. for other	14 garden apartments 20 mid-rise apartments 9 three-family 8 two family 6 other dwellings
R-10A	Multi-Family High Density Efficiency	2 acres	48 plus 1 for each 1,000 sq. ft. of indoor social, recreational space
R-10	Multi-Family High Density	20,000 sq. ft.	48
R-H	Multi-Family High-Rise	5 acres	48.4

Similar to excessively large lots, restrictive forms of land use that exclude any particular form of housing, particularly multi-family housing, discourage the development of affordable housing. Allowing varied residential types reduces potential impediments to housing choice by members of the protected classes. Multi-family units, in general, are allowed by-right in six of the County's 17 districts. In the County, there are 46,197 acres zoned for medium density development and 10,630 acres zoned for high density development. Medium and high density zoning districts are scattered throughout the Developed and Developing Tiers in the County, as shown in Figure 4-6.

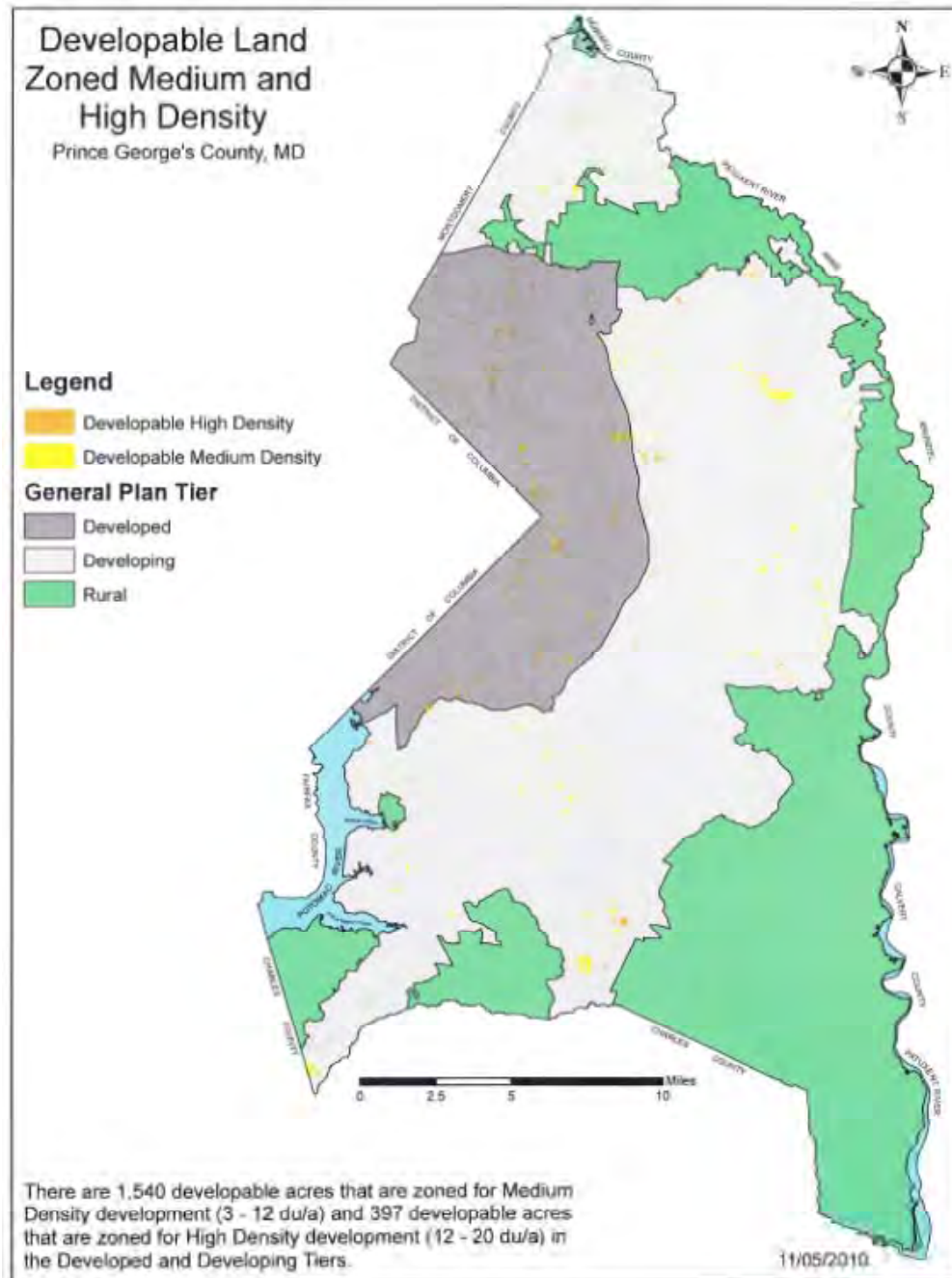


Figure 4-7
Medium and High Density Zoning, 2010



Of the County's total acreage, as of November 2010 there were 1,937 acres available for medium and high density residential development. The majority of developable land was scattered throughout the County's Developing Tier, as shown in Figure 4-7.

Figure 4-8
Medium and High Density Zoning, 2010



Of the 49,197 acres zoned for medium density development in the County, only 1,540 acres (3.3%) are developable. At a maximum permitted density of 12 dwelling units per acre, this translates to a maximum potential of 18,480 dwelling units.

Of the 10,630 acres zoned for high density development, only 397 acres (3.7%) are developable. At a maximum permitted density of 20 dwelling units per acre, this translates to a maximum potential of 7,940 dwelling units. The County should commit to ensuring that at least 20% (equivalent to 5,284 units) of these units are developed for households below 80% of median household income.

c. Alternative Design

Allowing alternative designs provides opportunities for affordable housing by reducing the cost of infrastructure spread out over a larger parcel of land. Alternative designs may also increase the economies of scale in site development, further supporting the development of lower cost housing. Alternative designs can promote other community development objectives, including agricultural preservation or protection of environmentally sensitive lands, while off-setting large lot zoning and supporting the development of varied residential types. However, in many communities, alternative design developments often include higher-priced homes. Consideration should be given to alternative design developments that seek to produce and preserve affordable housing options for working and lower income households.

Prince George's County's ordinance provides for several alternative designs, including:

- **Mixed-Use Planned Community:** A contiguous land assemblage of 250 or more acres in the E-I-A or M-X-T Zone at the intersection of two State highways classified as expressways or freeways, which is developed or to be developed as follows: mixing residential, employment, commercial retail, commercial office, hotel or lodging, civic buildings, parks, or recreational uses; creating a self-sustaining neighborhood with a balanced mix of residential, commercial, public, institutional, and recreational uses; providing uses which are physically and functionally coordinated, with a network of streets and sidewalks forming an integrated circulation system; giving priority in use placement and site design to public spaces, civic uses, recreational uses, and institutional buildings; and exhibiting throughout a high quality of architecture, site design and landscaping, and placement of different uses.
- **Metro Planned Community:** A contiguous land assemblage, no less than 150 acres, abutting an existing mass transit rail station site operated by the Washington Metropolitan Area Transit Authority and including land placed in preservation by the State of Maryland, and planned to be developed with an array of commercial, lodging, recreational, residential, entertainment, retail, social, cultural, or similar uses which are interrelated by one or more themes.
- **Planned Environmental Preservation Community:** A high-quality residential community where dwelling units are built in clustered, attached, or multifamily

development, to enhance and preserve significant environmental features on and adjacent to the community property. The property must include at least 50 acres of contiguous parcels and must lie adjacent to planned and zoned employment and office uses and one or more significant environmental features, such as designated scenic rivers or streams.

Additionally, the County's Code allows for four Urban Center Districts, which are mixed-use districts with both residential and commercial areas as well as Urban Neighborhoods adjacent to the Urban Centers.

The County's Zoning Ordinance includes creative, alternative design options for mixed-use developments strategically located in close proximity to mass transit.

These design concepts are excellent opportunities to require a minimum set-aside of new multi-family housing units for households below 80% of median household income.

d. Definition of Family

Local zoning and land use laws that treat groups of unrelated persons with disabilities less favorably than similar groups of unrelated persons without disabilities violate the Fair Housing Act. Restrictive definitions of family may impede unrelated individuals from sharing a dwelling unit. Defining family broadly advances non-traditional families and supports the blending of families who may be living together for economic purposes. Restrictions in the definition of family typically cap the number of unrelated individuals that can live together. These restrictions can impede the development of group homes, effectively restricting housing choice for persons with disabilities.

The Zoning Ordinance defines family as follows:

1. An individual maintaining a household in a "Dwelling Unit"; or
2. Two or more individuals related by blood, adoption, or marriage (including a "Foster Home" relationship other than a "Group Residential Facility") who maintain a common household in a "Dwelling Unit"; or
3. Not more than five individuals (excluding servants), all or a part of whom are unrelated to one another by blood, adoption, or marriage, and who maintain a common household in a "Dwelling Unit."

Generally, a jurisdiction may restrict the ability of groups of unrelated persons to live together as long as the restrictions are imposed on all such groups. A broader definition of a family could allow for more housing choice for larger households which function as a cohesive unit and the use of the residence is compatible with other dwellings in similar single family zoning districts, thus increasing housing choice. For example, defining family as "any group of individuals living together as the functional equivalent of a family where the residents may share living expenses, chores, eat meals together and are a close group with social, economic and psychological commitments to each other; a family includes, for example, the residents of residential



care facilities and group homes for person with disabilities; a family does not include larger institutional group living situations such as dormitories, fraternities, or sororities” would be sufficiently broad to include large families, non-traditional families, and persons with disabilities residing in a group home. While this broader definition may increase housing choice among County residents, the current definition is sufficient to comply with the Fair Housing Act, since it allows for a relatively large group of unrelated persons to live together.

e. Regulations for Group Homes for Persons with Disabilities

Group homes are residential uses that do not adversely impact a community. Efforts should be made to ensure group homes can be easily accommodated throughout the community under the same standards as any other single-family residential use. Of particular concern are those that serve members of the protected classes such as the disabled. Because a group home for the disabled serves to provide a non-institutional experience for its occupants, imposing conditions are contrary to the purpose of a group home. More importantly, the restrictions, unless executed against all residential uses in the zoning district, are an impediment to the siting of group homes and are in violation of the Fair Housing Act.

Prince George’s County’s Ordinance defines “group residential facilities” as:

A ‘Dwelling Unit’ or ‘Foster Home,’ operated by a responsible individual or organization, which has a program designed to provide a supportive living arrangement for five or more individuals (unrelated to the operator by blood, adoption, or marriage) who are members of a service population that, because of age or emotional, mental, physical, familial, or social conditions, needs supervision.

Group homes of up to eight residents are treated as single-family units and are permitted by-right wherever single-family dwellings are allowed. Group homes of more than eight persons are permitted by special exception in ten of the 17 residential districts.

Two primary purposes of a group home residence are normalization and community integration. By allowing group residences throughout the community in agreement with the same standards as applied to all other residential uses occupied by a family, the purposes of the use are not hindered and housing choice for the disabled is not impeded. The County’s current allowance of up to eight people living together in a group home is sufficient to comply with the Fair Housing Act and to allow for varied housing choice for persons with disabilities.

viii. Taxes

Taxes impact housing affordability. While not an impediment to fair housing choice, real estate taxes can impact the choice that households make with regard to where to live. Tax increases can be burdensome to low-income homeowners, and increases are usually passed on to renters through rent increases. Tax rates for specific districts and the assessed value of all properties are the two major calculations used to determine revenues collected by a jurisdiction. Determining a jurisdiction’s relative housing affordability, in part, can be accomplished using tax rates.

However, straight comparison of tax rates to determine whether a property is affordable or unaffordable gives an incomplete and unrealistic picture of property taxes. Local governments with higher property tax rates, for example, may have higher rates because the assessed values

of properties in the community are low, resulting in a fairly low tax bill for any given property. In all of the communities surrounding a jurisdiction, comparable rates for various classes of property (residential, commercial, industrial, etc.) are assigned to balance each community's unique set of resources and needs. These factors and others that are out of the municipality's control must be considered when performing tax rate comparisons.

Real estate taxes are levied on land and buildings and provide primary revenue streams for counties, municipalities, and school districts throughout Maryland. Properties are reassessed every three years and taxes are levied on 100% of the assessed value. For assessment purposes, Prince George's County is divided into thirds. One-third of the County is reassessed each year, with the most current reassessment occurring between 2010 and 2012. This policy of frequent policy reassessment helps to ensure that properties are properly taxed for their value. In states where reassessments are sporadic, undervalued properties face a smaller tax burden while overvalued properties have an inflated tax liability.

Prince George's County has 27 taxing districts. Each district has a County and municipal millage rate, which is levied on every \$100 of assessed value. (Assessed value is equivalent to 100% of fair market value.) Additionally, all properties are subject to a Statewide property tax, and municipalities may levy additional taxes for schools, sanitation services, etc. Bowie has one of the lowest tax liabilities in the County at \$1,219 per \$100,000 assessed valued. Figure 4-8 details the County and municipal rates for each of the taxing districts in the County, as well as a sample of millage rates from the neighboring counties in the Washington, D.C. area.

Tax liabilities in the County range from \$1,058 in Upper Marlboro to \$1,900 in Colmar Manor. Of the ten taxing districts with the greatest tax liability, eight were located within the Capital Beltway, where the County's numerous impacted areas are clustered. Essentially, this means that the highest tax rates are assessed on the lowest-income households in the County. In addition, of the districts with lower tax liabilities, several (including College Park and Capital Heights) were also located within the Beltway. In comparison with other municipalities in the greater D.C. area, tax rates in Prince George's County were about on par with those in neighboring counties.



**Figure 4-9
Estimated Annual Real Estate Taxes for Select Municipalities, 2010**

Taxing District	County Rate	Municipal Rate	Total County and Municipal millage, per \$100	County and Municipal Taxes, per \$100,000 assessed value
Colmar Manor	0.862	1.038	1.9	\$1,900
Morningside	0.823	0.78	1.603	\$1,603
Mt. Rainier	0.788	0.79	1.578	\$1,578
Greenbelt	0.783	0.79	1.573	\$1,573
Bladensburg	0.794	0.74	1.534	\$1,534
District Heights	0.799	0.73	1.529	\$1,529
Laurel	0.754	0.71	1.464	\$1,464
Riverdale Park	0.784	0.677	1.461	\$1,461
Forest Heights	0.854	0.5671	1.4211	\$1,421
Hyattsville	0.786	0.63	1.416	\$1,416
Edmonston	0.814	0.6	1.414	\$1,414
University Park	0.797	0.5838	1.3808	\$1,381
Seat Pleasant	0.798	0.58	1.378	\$1,378
New Carrollton	0.842	0.5	1.342	\$1,342
Cottage City	0.814	0.52	1.334	\$1,334
Brentwood	0.931	0.382	1.313	\$1,313
North Brentwood	0.951	0.347	1.298	\$1,298
Fairmont Heights	0.867	0.42	1.287	\$1,287
Berwyn Heights	0.795	0.486	1.281	\$1,281
Cheverly	0.801	0.48	1.281	\$1,281
Landover Hills	0.795	0.48	1.275	\$1,275
College Park	0.946	0.322	1.268	\$1,268
Eagle Harbor	0.96	0.292	1.252	\$1,252
Bowie	0.819	0.4	1.219	\$1,219
Capitol Heights	0.809	0.392	1.201	\$1,201
Glenarden	0.824	0.336	1.16	\$1,160
Upper Marlboro	0.818	0.24	1.058	\$1,058
Sample of Property Taxes from Neighboring Counties				
City of Rockville - Class 1 (Montgomery Co.)	0.699	2.058	2.757	\$2,757
Havre de Grace (Harford Co.)	0.896	0.6	1.496	\$1,496
Indian Head (Charles Co.)	0.998	0.3	1.298	\$1,298
Annapolis (Anne Arundel Co.)	0.525	0.53	1.055	\$1,055
Gaithersburg (Montgomery Co.)	0.699	0.262	0.961	\$961
Chesapeake Beach (Calvert Co.)	0.556	0.37	0.926	\$926



There are several Statewide programs to assist program owners in lowering their tax liability. These include the Homeowners' Property Tax Credit Program (Circuit Breaker), which is determined according to the relationship between a homeowner's income and property tax liability. The State also manages the Homestead Tax Credit, which can reduce a homeowner's tax liability if their property has increased in value by more than 10% over the previous year. Lastly, the State has a property tax deferral program for persons ages 65 and older.

ix. Public Transit

Households without a vehicle, which in many cases are primarily low- to moderate-income households, are at a disadvantage in accessing jobs and services, particularly if public transit is inadequate or absent. Access to public transit is critical to these households. Without convenient access, employment is potentially at risk and the ability to remain housed is threatened. The linkage between residential areas of concentration of minority and LMI persons (i.e., impacted areas) and employment opportunities are key to expanding fair housing choice for members of the protected classes.

In 2009, 9.4% of households in the Urban County were transit-dependent. Among renter households, one in five did not have access to a vehicle, compared to only 3.2% of owner households. In Bowie, transit-dependence was lower overall, with only 2.5% of all households without a vehicle. Among renters, 11.2% were transit-dependent compared to 1.4% of owners.

**Figure 4-10
Percent of Transit-Dependent Households by Tenure, 2009**

	All Households	Renter-Occupied	Owner-Occupied
Prince George's County	8.9%	19.9%	3.1%
Urban County*	9.4%	20.1%	3.2%
City of Bowie	2.5%	11.2%	1.4%

**The Urban County is Prince George's County exclusive of the City of Bowie*

Source: U.S Census Bureau, 2005-2009 American Community Survey (B25044)

Minority households in the County, in particular Blacks and Hispanics, were more likely to be transit-dependent. In 2000 (the most recent year for which data is available), 12.4% of Black households and 15.6% of Hispanic households in the Urban County did not have a vehicle, compared to 7.1% of Whites and 8.2% of Asians. In Bowie, however, Blacks and Hispanics were less likely to be transit dependent. No Hispanic households and only 3% of Black households did not have a vehicle, compared to 4% of White households and 6.2% of Asian households.



Figure 4-11
Percent of Transit-Dependent Households by Race and Ethnicity, 2000

	White	Black	Asian	Hispanic
Prince George's County	6.6%	12.1%	8.1%	15.2%
Urban County*	7.1%	12.4%	8.2%	15.6%
City of Bowie	4.0%	3.0%	6.2%	0.0%

*The Urban County is Prince George's County exclusive of the City of Bowie

Source: U.S. Census Bureau, 2000 Census SF-3 (HCT33A, HCT 33B, HCT33D, HCT33H)

The majority of Urban County residents (76.3%) drove to work, with 63.3% driving alone. Public transportation was utilized by 17.9% of residents. Subways and busses were the most popular modes of public transit. In Bowie, residents were more likely to drive to work, and one in ten workers utilized public transit as their primary means of transit to work.

Figure 4-12
Means of Transportation to Work for Workers 16 Years and Older, 2009

	Urban County*		City of Bowie	
	#	%	#	%
Total sample	401,288	100.0%	28,309	100.0%
Car, truck, or van:	306,169	76.3%	23,780	84.0%
Drove alone	254,183	63.3%	21,037	74.3%
Carpooled	51,986	13.0%	2,743	9.7%
Public transportation:	71,695	17.9%	2,867	10.1%
Bus or trolley bus	24,363	6.1%	426	1.5%
Streetcar	629	0.2%	0	0.0%
Subway or elevated	44,481	11.1%	2,085	7.4%
Railroad	2,208	0.6%	356	1.3%
Motorcycle	237	0.1%	37	0.1%
Bicycle	1,201	0.3%	63	0.2%
Walked	8,844	2.2%	194	0.7%
Other means	3,434	0.9%	176	0.6%
Worked at home	10,338	2.6%	1,192	4.2%

*The Urban County is Prince George's County exclusive of the City of Bowie

Source: U.S. Census Bureau, 2005-2009 American Community Survey (B08301)

Four transit authorities serve Prince Georges County, including:

- Washington Metro Area Transit Authority (WMATA),
- Maryland Area Regional Community (MARC) train service, managed by the Maryland Transit Authority,

Urban County of Prince George's County and the City of Bowie



- The Bus, managed by Prince George's County Transit, and
- Central Maryland Regional Transit (CMRT).

WMATA is the largest service provider for communities closest to Washington D.C., while The Bus serves areas throughout the County. Additionally, CMRT serves areas within and surrounding the City of Laurel.

a. **Destinations and Routes**

Fixed route services vary by provider:

1) **WMATA**

WMATA offers 70 fixed route bus routes and 15 Metrorail stations in the County, which primarily connect communities to Washington D.C. Metrorail offers services from 5 am to midnight, with limited later night services on weekends, and tickets range from \$1.95 to \$5.00, depending on how far the trip is. Metrobus fares are \$1.70 with cash and \$1.50 when using SmartCards.

2) **MARC**

The County is served by two MARC train lines, for a total of 8 stations. Service is limited to the northern parts of the County between Washington, D. C. and Baltimore, and trains run Monday through Friday from 5 am to 11 pm.

3) **The Bus**

The Bus offers 25 fixed route services primarily outside of the Capital Beltway. Routes connect residents to Metrorail and MARC stations, as well as major education, employment, and commercial centers. Service is available Monday to Friday and fares are \$1.00 for adults.

4) **CMRT**

CMRT runs seven fixed routes in the Laurel area. Routes in general run from 6 am to 8 pm, Monday through Friday, with several routes offering Saturday services from 9 am to 6 pm. CMRT routes connect to major employment and commercial centers, as well as to transit hubs in Anne Arundel and Howard Counties. The base fare for adults is \$2.00.

Transit services are centered in the developed areas closest to Washington D.C. and in the developing areas in the northern portion of the County, along the Washington D.C.-Baltimore corridor. Eastern and southern portions of the County, on the other hand, have more limited public transit options. Additionally, there are few late night transit services, which may disproportionately impact third shift workers in these areas farthest away from the Beltway.



Public transit options are greatest in the northern and central areas of the County.

New residential developments in these areas would be ideally suited for affordable housing incentives. By requiring an affordable housing set-aside and providing financial incentives, the County could expand fair housing choice in locations advantageous to transit-dependent households of members of the protected classes.

b. Accessibility

All fixed-route services are equipped with wheelchair lifts. Prince George's County Transit Authority and CMRT also offer para-transit services throughout the County.

B. Private Sector Policies

In addition to the public sector policies that influence fair housing choice, there are private sector policies that can influence the development, financing, and advertising of real estate. While Prince George's County and the City of Bowie cannot be held responsible for impediments to fair housing choice identified in private sector policies, they do have an obligation to identify such impediments and bring them to the attention of the appropriate entity. In some cases, it is appropriate and even expected that the County and City will attempt to communicate the existence of such impediments to the appropriate entity. For example, if real estate advertisements in a local newspaper are noted to contain questionable language that may be discriminatory, the County and the City should advise the newspaper of its legal obligations under the Fair Housing Act.

In this section of the AI, mortgage lending practices, high-cost lending and real estate advertising are analyzed.

i. Mortgage Lending Practices

Under the terms of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.), any commercial lending institution that makes five or more home mortgage loans must report all residential loan activity to the Federal Reserve Bank under the terms of the Home Mortgage Disclosure Act (HMDA). The HMDA regulations require most institutions involved in lending to comply and report information on loans denied, withdrawn, or incomplete by race, sex, and income of the applicant. The information from the HMDA statements assists in determining whether financial institutions are serving the housing needs of their communities. The data also helps to identify possible discriminatory lending practices and patterns.

The most recent HMDA data available for Prince George's County is from 2007 to 2009. Reviewing this data helps to determine the need to encourage area lenders, other business lenders, and the community at large to actively promote existing programs and develop new programs to assist residents in securing home mortgage loans for home purchases. The data focus on the number of homeowner mortgage applications received by lenders for home purchase of one- to four-family dwellings and manufactured housing units in the County. The information provided is for the primary applicant only. Co-applicants were not included in the



analysis. In addition, where no information is provided or categorized as not applicable, no analysis has been conducted due to lack of information. Figure 4-12 summarizes three years of HMDA data by race, ethnicity, and action taken on the applications, followed by detailed analysis.

**Figure 4-13
Summary Report Based on Action Taken Mortgage Data, 2007-2009**

	2007		2008		2009	
	#	%	#	%	#	%
Applied For	30,765	100.0%	15,638	100.0%	17,796	100.0%
White	5,587	18.2%	2,418	15.5%	3,083	17.3%
Black	16,742	54.4%	9,034	57.8%	8,694	48.9%
Asian	687	2.2%	451	2.9%	618	3.5%
Other Race*	329	1.1%	195	1.2%	246	1.4%
Not Applicable/Not Provided	7,420	24.1%	3,540	22.6%	5,155	29.0%
Hispanic**	3,631	11.8%	1,087	7.0%	1,169	6.6%
Originated	12,642	41.1%	6,287	40.2%	6,769	38.0%
White	2,916	52.2%	1,191	49.3%	1,508	48.9%
Black	7,577	45.3%	3,908	43.3%	3,919	45.1%
Asian	353	51.4%	220	48.8%	310	50.2%
Other Race*	173	52.6%	85	43.6%	104	42.3%
Not Applicable/Not Provided	1,623	21.9%	883	24.9%	928	18.0%
Hispanic**	1,880	51.8%	446	41.0%	461	39.4%
Denied	5,572	18.1%	2,285	14.6%	1,594	9.0%
White	1,003	18.0%	322	13.3%	289	9.4%
Black	3,650	21.8%	1,496	16.6%	962	11.1%
Asian	103	15.0%	59	13.1%	79	12.8%
Other Race*	70	21.3%	43	22.1%	28	11.4%
Not Applicable/Not Provided	746	10.1%	365	10.3%	236	4.6%
Hispanic**	738	20.3%	208	19.1%	162	13.9%

* Other Race includes American Indian/Alaska Native and Hawaiian groups

** Hispanic ethnicity is counted independently of race.

Source: 2007-2009 Federal Financial Institutes Examination Council, Home Mortgage Disclosure Act database

The most obvious trend in 2007-2009 HMDA data for Prince George's County is the steep drop in the number of loan applications. This can be attributed primarily to stagnating home sales rates in the County that coincide with the national housing crisis. The number of loan applications dropped by approximately half between 2007 and 2008, from 30,765 to 15,638, before rising to 17,796 in 2009.

Over the course of the three years, the percentage of applications that resulted in loan originations decreased slightly, a trend likely related to the decreasing number of total applications and a more restricted lending environment. The percentage of successful



applications for all racial and ethnic groups declined: White applicants dropped from 52.2% to 48.9%; Black applicants dropped from 45.3% to 45.1%; Asian applicants fell from 51.4% to 50.2%; and Hispanic applicants dropped from 51.8% to 39.4%.

Between 2007 and 2009, the proportion of applications resulting in denials decreased significantly from 18.1% to 9.0%. Black applicants experienced the most dramatic decrease in denials during this period. Whereas 21.8% of Black applicants were denied loans in 2007, by 2009 Blacks had a denial rate of 11.1%, or one in nine applicants. In 2007, denial rates for Black households were the highest rates among specified racial minorities; however, by 2009 Hispanic households had the highest denial rate.

Hispanics also had significantly higher denial rates than the overall rates. In 2007, 20.3% of mortgage loans submitted by Hispanic applicants were denied. This rate dropped slightly to 19.1% before decreasing to its lowest level of 13.9% in 2009.

Asian households had the lowest rates of denials in 2006 and 2007, but the 2009 rate (12.8%) was the second highest rate among racial and ethnic groups.

The following section contains detailed analysis for applications filed in 2009, the latest year for which information is available.

**Figure 4-14
Summary Report Based on Action Taken Mortgage Data, 2009**

	Total Applicants*		Originated		Approved, Not Accepted		Denied		Withdrawn/Incomplete	
	#	%	#	%	#	%	#	%	#	%
Loan Type										
Conventional	4,333	24.3%	1,232	28.4%	157	3.6%	385	8.9%	2,465	56.9%
FHA	11,128	62.5%	4,519	40.6%	329	3.0%	1,021	9.2%	5,064	45.5%
VA	2,262	12.7%	983	43.5%	59	2.6%	183	8.1%	1,028	45.4%
FSA	73	0.4%	35	1.5%	1	0.0%	5	0.2%	30	1.3%
Loan Purchase: Home Purchase										
One- to Four-Family Unit	17,719	99.6%	6,758	38.1%	536	3.0%	1,553	8.8%	8,573	48.4%
Manufactured Housing Unit	77	0.4%	11	14.3%	10	13.0%	41	53.2%	14	18.2%
Applicant Race										
White	3,083	17.3%	1,508	48.9%	112	3.6%	289	9.4%	1,106	35.9%
Black	8,694	48.9%	3,919	45.1%	306	3.5%	962	11.1%	3,353	38.6%
Asian	618	3.5%	310	50.2%	27	4.4%	79	12.8%	193	31.2%
American Indian/Alaska Native	148	0.8%	55	37.2%	4	2.7%	18	12.2%	66	44.6%
Hawaiian/Pacific Islander	98	0.6%	49	50.0%	4	4.1%	10	10.2%	33	33.7%
Hispanic**	1,169	6.6%	461	39.4%	41	3.5%	162	13.9%	459	39.3%
No Information	5,155	29.0%	928	18.0%	93	1.8%	236	4.6%	3,836	74.4%
Applicant Sex										
Male	7,179	40.3%	3,352	46.7%	252	3.5%	789	11.0%	2,647	36.9%
Female	6,522	36.6%	3,000	46.0%	247	3.8%	686	10.5%	2,464	37.8%
No Information	4,095	23.0%	417	10.2%	47	1.1%	119	2.9%	3,476	84.9%
Total	17,796	100.0%	6,769	38.0%	546	3.1%	1,594	9.0%	8,587	48.3%

* Total Applications do not include loans purchase by another institution.

** Hispanic ethnicity is counted independently of race.

Source: 2007-2009 Federal Financial Institutes Examination Council, Home Mortgage Disclosure Act database



a. Conventional Loans vs. Government-Backed Loans

Loan types in 2009 included conventional mortgage loans and government-backed loans, including FHA, VA, and FSA. Comparing these loan types helps to determine if the less stringent underwriting standards and lower down payment requirements of government-backed loans expand homeownership opportunities. In Prince George's County, 75.7% (13,463) of the households that applied for a mortgage loan applied for a government-backed loan. Of these, 11,140 (82.7%) were minority households.

The denial rates for government-backed loans were lower overall than the denial rate for conventional loans, although denial rates for FHA loans were slightly higher than those for conventional loans:

- The denial rate for FSA loans was 0.2%
- The denial rate for VA-guaranteed loans was 8.1%.
- The denial rate for FHA loans was 9.2%.
- The denial rate for conventional loans was 8.9%.

b. Denial of Applications

In 2009, the mortgage applications of 1,594 households in Prince George's County were denied (9.0%). Denial reasons were given for 1,359 of these households and included the following:

- Debt-to-Income: 31.4%
- Credit history: 23.0%
- Collateral: 13.5%
- Other: 11.1%
- Credit application incomplete: 7.1%
- Unverifiable information: 6.6%
- Insufficient Cash: 4.0%
- Employment history: 2.7%
- Mortgage insurance denied: 0.4%.

An unsatisfactory debt-to-income ratio, poor credit history, and lack of sufficient collateral were the major reasons for denial of home mortgage applications.

Between 2007 and 2009, the denial rates for Whites decreased from 18.0% to 9.4%. The denial rates for Blacks decreased at an even greater rate. In 2007, the denial rate for Blacks was 21.8%; by 2009, the rate had decreased to 11.1%. For Hispanic households, the denial rate in 2007 was 20.3%. After decreasing to 19.1% in 2008, the denial rate for Hispanics dropped significantly to 13.9% in 2009.



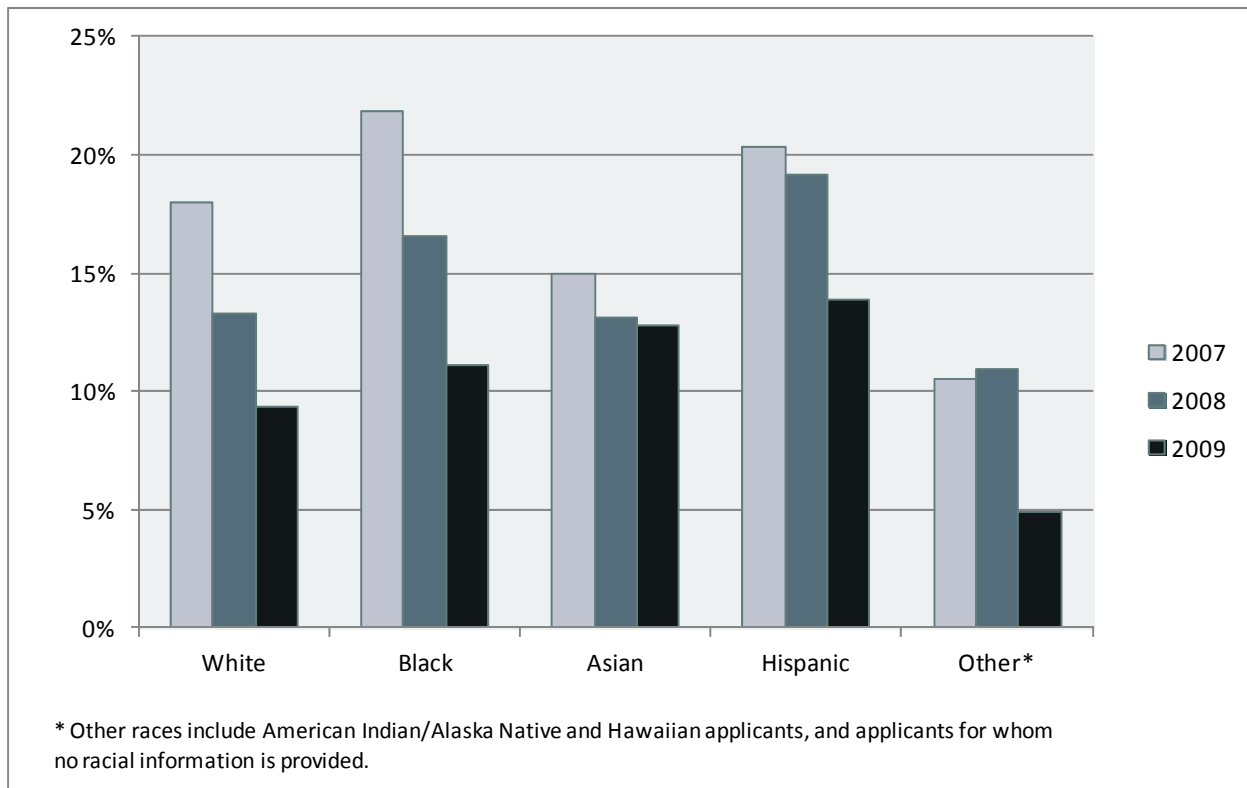
Figure 4-15
Denials by Race and Ethnicity, 2007-2009

	2007			2008			2009		
	Total Applications	Denials	Denial Rate	Total Applications	Denials	Denial Rate	Total Applications	Denials	Denial Rate
White	5,587	1,003	18.0%	2,418	322	13.3%	3,083	289	9.4%
Black	16,742	3,650	21.8%	9,034	1,496	16.6%	8,694	962	11.1%
Asian	687	103	15.0%	451	59	13.1%	618	79	12.8%
American Indian/Alaska Native	196	42	21.4%	104	15	14.4%	148	18	12.2%
Hawaiian	133	28	21.1%	91	28	30.8%	98	10	10.2%
No information provided	7,420	746	10.1%	3,540	365	10.3%	5,155	236	4.6%
Hispanic*	3,631	738	20.3%	1,087	208	19.1%	1,169	162	13.9%
Total	30,765	5,572	18.1%	15,638	2,285	14.6%	17,796	1,594	9.0%

* Hispanic ethnicity is counted independent of race.

Source: 2007-2009 Federal Financial Institutes Examination Council, Home Mortgage Disclosure Act database

Figure 4-16
Denials by Race and Ethnicity, 2007-2009



The mortgage denial rates for Blacks and Hispanics maintained the highest levels in 2007 and 2008.

In 2009, denial rates for Blacks and Hispanics both continued their precipitous declines, in contrast to the slower rate declines for Asians. In 2009, the loan denial rate for Black households was 11.1% and for Hispanic households, 13.9%. For Asian households, the denial rate was 12.8%. For White households, the denial rate was significantly lower at 9.4%.

For this analysis, lower income households include those with incomes between 0% - 80% of the median family income (MFI), while upper income households include households with incomes above 80% of MFI.

Applications made by lower income households accounted for 33.1% of all denials in 2007 and 46.6% of all denials in 2008; they accounted for 36.3% of total applications for those two years. In 2009, lower income households comprised 64.5% of all denials but only 56.5% of all applications. Notably, in 2007, upper income households had a higher denial rate than lower income households.

**Figure 4-17
Denials by Income, 2007-2009**

	2007			2008			2009		
	Total Applications	Denials	Denial Rate	Total Applications	Denials	Denial Rate	Total Applications	Denials	Denial Rate
Below 80% MFI	8,907	1,747	19.6%	5,920	1,049	17.7%	8,997	1,014	11.3%
Above 80% MFI	17,598	3,533	20.1%	8,413	1,204	14.3%	6,923	557	8.0%
Total	26,505	5,280	19.9%	14,333	2,253	15.7%	15,920	1,571	9.9%

Source: 2007-2009 Federal Financial Institutes Examination Council, Home Mortgage Disclosure Act database

Among lower income households, denial rates were generally slightly higher among minorities. In 2009, the denial rate for Black households (12.4%) was higher than for White households (11.8%). While the denial rate for Whites remained relatively stable between 2007 and 2008, the rates for Black households decreased from 21.1% to 17.8%, while Hispanic household denial rates increased from 18.9% to 21.6%.



Figure 4-18
Denials by Race for Lower Income Applicants, 2007-2009

	2007			2008			2009		
	Total Applications	Denials	Denial Rate	Total Applications	Denials	Denial Rate	Total Applications	Denials	Denial Rate
White	1,812	332	18.3%	1,065	194	18.2%	1,809	214	11.8%
Black	5,392	1,140	21.1%	3,609	641	17.8%	4,705	585	12.4%
Asian	161	26	16.1%	177	32	18.1%	340	54	15.9%
Amer. Indian/Alaska Native	82	14	17.1%	59	9	15.3%	118	16	13.6%
Hawaiian	50	12	24.0%	30	10	33.3%	67	8	11.9%
No Information Provided	1,410	223	15.8%	980	163	16.6%	1,958	137	7.0%
Hispanic*	1,283	242	18.9%	661	143	21.6%	943	140	14.8%
Total	8,907	1,747	19.6%	5,920	1,049	17.7%	8,997	1,014	11.3%

* Hispanic ethnicity is counted independently of race.

Source: 2007-2009 Federal Financial Institutes Examination Council, Home Mortgage Disclosure Act database

Overall, denial rates were lower for upper income households than lower income households. Among upper income households, however, minorities continued to experience significantly higher denial rates compared to White households. Among upper income Black households in 2009, the denial rate was 9.4%, which was significantly higher than the rate for Whites at 5.6%. Similarly, upper income Hispanic households had a denial rate of 9.7%.

Figure 4-19
Denials by Race for Upper Income Applicants, 2007-2009

	2007			2008			2009		
	Total Applications	Denials	Denial Rate	Total Applications	Denials	Denial Rate	Total Applications	Denials	Denial Rate
White	3,295	590	17.9%	1,283	122	9.5%	1,245	70	5.6%
Black	10,535	2,357	22.4%	5,253	840	16.0%	3,909	368	9.4%
Asian	483	71	14.7%	263	26	9.9%	273	25	9.2%
Amer. Indian/Alaska Native	100	25	25.0%	44	6	13.6%	30	2	6.7%
Hawaiian	76	14	18.4%	60	17	28.3%	31	2	6.5%
No Information Provided	3,109	476	15.3%	1,510	193	12.8%	1,435	90	6.3%
Hispanic*	1,941	432	22.3%	379	63	16.6%	217	21	9.7%
Total	17,598	3,533	20.1%	8,413	1,204	14.3%	6,923	557	8.0%

* Hispanic ethnicity is counted independently of race.

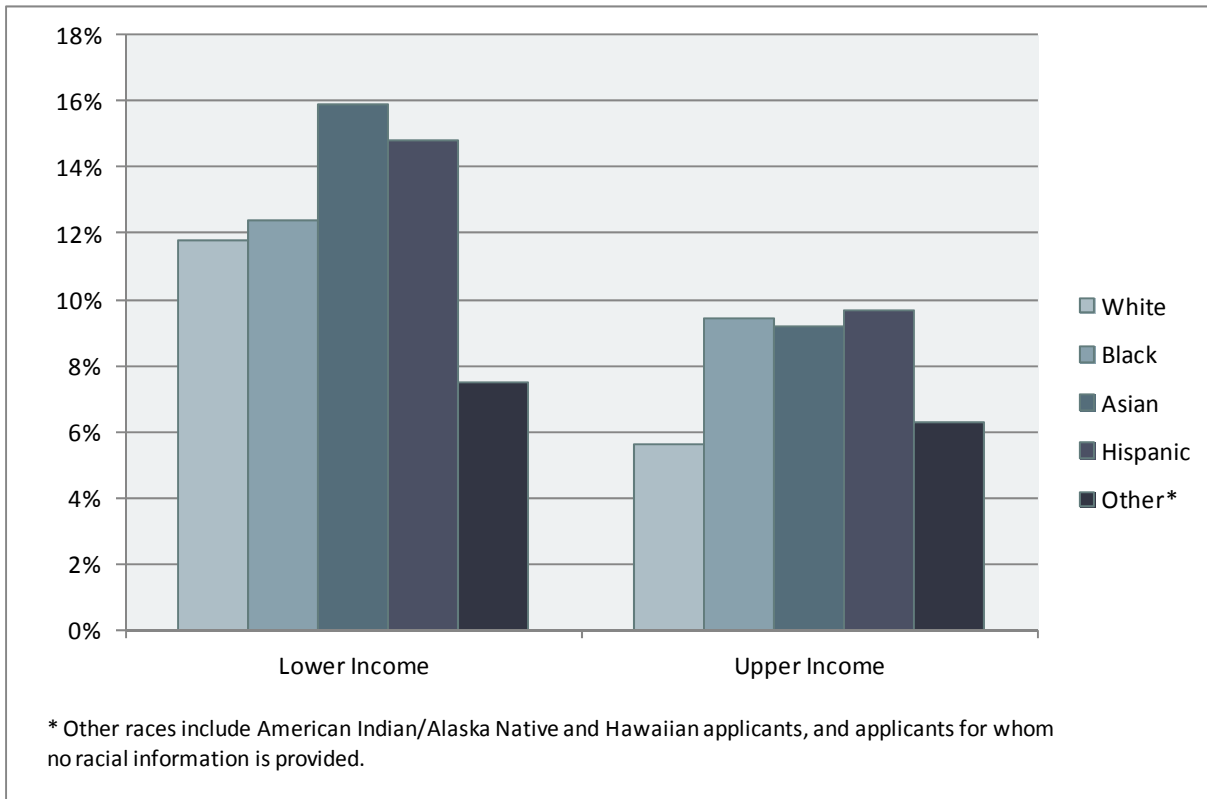
Source: 2007-2009 Federal Financial Institutes Examination Council, Home Mortgage Disclosure Act database

Upper income minority households experienced denial rates significantly higher than those of White upper income households.

Among upper income Black and Hispanic households in 2009, mortgage denial rates were 9.4% and 9.7%, respectively, compared to a denial rate of 5.6% among Whites. While this fact alone does not imply an impediment to fair housing, the pattern is consistent with discrimination.



**Figure 4-20
Denial Rates by Race and Income, 2009**



The 2009 HMDA data for Prince George’s County was analyzed to determine if a pattern of loan denials exists by census tract. Of the 62 tracts with denial rates greater than or equal to 10%, 24 are impacted areas. Map 10 on the following page illustrates the rate of mortgage loan denials.

Of the 62 tracts with denial rates greater than or equal to 10% in 2009, 24 were in areas of minority concentration.

According to DHCD, housing counseling agencies and social service agencies are experiencing increasing levels of demand for their services while at the same time facing significant funding cuts in entitlement and competitive grant funding. DHCD will engage HUD-certified housing counselors to target credit repair education through existing advocacy organizations that work extensively with minorities. Prince George’s County is currently evaluating a proposal from the Coalition for Homeownership Preservation in Prince George’s County to preserve homeownership, stabilize neighborhoods and maintain property values by reducing the rate of foreclosure and vacant blighted properties. The Coalition will provide financial education services, increase public awareness of foreclosure alternatives and help homeowners to retain their homes through loan modification programs such as the Emergency Mortgage Assistance



program and facilitating the transition of new homeowners into these properties when retention of the home is not feasible.

In the future, DHCD will encourage funded housing counseling agencies to provide financial education information to homebuyers and homeowners that include how to select an affordable property, affordable mortgage loan products, budget and credit management, and how to estimate and save for down payment and closing costs.

It is the County's intent to conduct a more in depth analysis of HMDA data to determine if discrimination is occurring against minority applicant households. The Reinvestment Fund (TRF) has studied the effects of foreclosure for a number of communities in the Mid-Atlantic region, most notably for the State of Maryland and the City of Baltimore. TRF is a national innovator in capitalizing distressed communities and stimulating economic growth for low and moderate-income families. Using the U.S. Joint Economic Committee Report, TRF conservatively estimated Prince George's County homeowners would lose \$310 million in property value. TRF also estimated that Maryland homeowners lost \$2.73 billion in cumulative property values with a property tax loss of \$19.1 billion. TRF was unable to estimate the property tax loss in Prince George's County since it was not the subject of the study. TRF reviewed the following data sources:

- Mortgage Originations - HOME Mortgage Act Disclosure data 2004-2006
- Mortgage Delinquencies – McDash Analytics, LLC 2004-2007
- Mortgage Bankers Association of America National Delinquency Survey
- Mortgage Foreclosures – Prince George's County - RealtyTrac, Inc 2007
- Property Sale and Transaction History – First American CoreLogic, Inc.

In October 2007, DHCD first contacted TRF to create a Market Value Analysis (MVA) for Prince George's County similar to the ones created for the State of MD and Baltimore City. The proposed MVA would further analyze foreclosure and delinquencies in the County. The scope of services would include the effect of loan discrimination against minority households as well as housing market characteristics and other demographic data. TRF would map and analyze the most recent HOME Mortgage Disclosure Act data for the last few years to help the County better understand where high cost loans, piggyback loans and adjusted rate mortgages (ARMs) are concentrated.

To create a foreclosure intervention strategy, TRF would need specific, reliable data on foreclosures in Prince George's County. TRF would gather, analyze and map loan-servicing data depicting the location and characteristics of communities by zip code identifying where the mortgage delinquencies are most severe. This would enable the County to target resources to areas where loan discrimination, mortgage delinquencies and foreclosures are severely affecting Prince George's County communities.

ii. High-Cost Lending Practices

The widespread housing finance market crisis of recent years has brought a new level of public attention to lending practices that victimize vulnerable populations. Subprime lending, designed for borrowers who are considered a credit risk, has increased the availability of credit to low-income persons. At the same time, subprime lending has often exploited borrowers, piling on excessive fees, penalties, and interest rates that make financial stability difficult to achieve.



Higher monthly mortgage payments make housing less affordable, increasing the risk of mortgage delinquency and foreclosure and the likelihood that properties will fall into disrepair.

Some subprime borrowers have credit scores, income levels, and down payments high enough to qualify for conventional, prime loans, but are nonetheless steered toward more expensive subprime mortgages. This is especially true of minority groups, which tend to fall disproportionately into the category of subprime borrowers. The practice of targeting minorities for subprime lending qualifies as mortgage discrimination.

Since 2005, Housing Mortgage Disclosure Act data has included price information for loans priced above reporting thresholds set by the Federal Reserve Board. This data is provided by lenders via Loan Application Registers and can be aggregated to complete an analysis of loans by lender or for a specified geographic area. HMDA does not require lenders to report credit scores for applicants, so the data does not indicate which loans are subprime. It does, however, provide price information for loans considered “high-cost.”

A loan is considered high-cost if it meets one of the following criteria:

- A first-lien loan with an interest rate at least three percentage points higher than the prevailing U.S. Treasury standard at the time the loan application was filed. The standard is equal to the current price of comparable-maturity Treasury securities.
- A second-lien loan with an interest rate at least five percentage points higher than the standard.

Not all loans carrying high APRs are subprime, and not all subprime loans carry high APRs. However, high-cost lending is a strong predictor of subprime lending, and it can also indicate a loan that applies a heavy cost burden on the borrower, increasing the risk of mortgage delinquency.

In 2009, there were 6,769 home purchase loans made for single-family or manufactured units in Prince George’s County. Of this total, 6,743 disclosed the borrower’s household income and 273 reported high-cost mortgages. Overall, lower income households were more likely to have high-cost mortgages than upper income households.

An analysis of loans in Prince George’s County by race and ethnicity reveals that minorities are generally overrepresented in high-cost lending. Among lower income minority households, 4.7% of Black applicants and 5.1% of Hispanic applicants had high-cost mortgages in 2009, compared to 3.9% of lower income White households.

Among upper income households, minorities were also overrepresented in high-cost lending; Blacks were four times more likely than Whites to have high-cost mortgages, with rates of 4.9% and 1.2%, respectively. Hispanics (2.3%) were almost twice as likely as Whites to have high-cost mortgages.

According to the Urban Institute reports in 2004-2006, minority homebuyers accounted for approximately half of all owner-occupant home borrowers in the Washington, DC region, but held 80% of all high-cost loans. Further, one-third of higher-income Black and Hispanic borrowers received high-cost loans compared to only 5% among high-income White borrowers.

Prince George’s County, one of the wealthiest majority Black counties in the nation, has nearly one-third of all foreclosures in the Washington, DC region. Predominantly Black neighborhoods have substantially higher concentrations of high-cost loans (71 loans per 1,000) compared to predominantly White neighborhoods (32 loans per 1,000). Further, predominantly Black census tracts comprise one-fifth of all census tracts in the region but two-fifths of the census tracts in the top percentage of high-cost loan density.



This disturbing news for Prince George's County is that high cost loans are de-stabilizing relatively stable, predominantly Black neighborhoods with low poverty rates. In effect, a large concentration of high cost loans in a neighborhood leads to foreclosure and vacant properties. Vacant properties lead to depressed home values and diminish the quality of life for neighbors who are not delinquent and in no danger of foreclosure. Vacant foreclosed homes and poorly maintained properties attract loitering and crime, further increasing the devaluation of the neighborhood.

Homeowners who lose their homes in foreclosure may diligently work to rebuild their credit but their reduced wealth will make them vulnerable to future financial problems. As a result, many neighborhoods will transition from stable owner occupants to more transient renters than before. The severe impact of foreclosure on minority households, neighborhoods and the County overall raise serious fair housing implications that lending discrimination places minority households at a greater risk of eviction, foreclosure and bankruptcy.



**Figure 4-21
High-Cost Lending by Race/Ethnicity and Income, 2007-2009**

		Lower Income*			Upper Income*		
		Total Origination	Hi-Cost Loans	% Hi-Cost	Total Origination	Hi-Cost Loans	% Hi-Cost
2007	White	951	166	17.5%	1,744	427	24.5%
	Black	2,669	522	19.6%	4,594	1,356	29.5%
	Asian	78	10	12.8%	255	33	12.9%
	Am. Indian/Alaska Native	51	13	25.5%	53	18	34.0%
	Hawaiian	24	2	8.3%	35	11	31.4%
	No information/NA	490	70	14.3%	1,064	238	22.4%
	Hispanic**	686	158	23.0%	997	375	37.6%
	Total	4,263	783	18.4%	7,745	2,083	26.9%
2008	White	505	48	9.5%	682	37	5.4%
	Black	1,634	154	9.4%	2,256	282	12.5%
	Asian	87	5	5.7%	131	12	9.2%
	Am. Indian/Alaska Native	30	3	10.0%	20	0	0.0%
	Hawaiian	9	1	11.1%	26	2	7.7%
	No information/NA	318	18	5.7%	562	34	6.0%
	Hispanic**	291	34	11.7%	154	11	7.1%
	Total	2,583	229	8.9%	3,677	367	10.0%
2009	White	848	33	3.9%	656	8	1.2%
	Black	2,113	100	4.7%	1,793	88	4.9%
	Asian	175	0	0.0%	134	2	1.5%
	Am. Indian/Alaska Native	42	2	4.8%	13	0	0.0%
	Hawaiian	31	1	3.2%	18	1	5.6%
	No information/NA	471	24	5.1%	449	14	3.1%
	Hispanic**	373	19	5.1%	87	2	2.3%
	Total	3,680	160	4.3%	3,063	113	3.7%
Three-Year Totals		10,526	1,172	11.1%	14,485	2,563	17.7%

* Does not include loans for which no income data was reported.

** Hispanic ethnicity is counted independently of race.

Source: 2007-2009 Federal Financial Institutes Examination Council, Home Mortgage Disclosure Act database

Notably, the percentage of high-cost mortgages declined significantly between 2007 and 2009, along with the total number of applications and originations. This could be due to policy changes that have limited subprime lending and/or to the necessity for lenders to make rates more competitive as the total number of applications dropped.

Analyzing high-cost lending by census tract in 2009 can identify areas where there are disproportionately larger numbers of high-interest loans. Of the 26 tracts with a high-cost loan percentage of 10% or more, 15 are impacted areas. Map 11 on the following page illustrates the percentages of high-cost mortgages extended to Urban County and Bowie residents.

Urban County of Prince George's County and the City of Bowie



Minority households are disproportionately represented among recipients of high-cost mortgage loans, particularly among upper income households.

Among upper income households, Blacks were four times as likely as Whites to have a high cost loan and Hispanics were twice as likely. Among lower income minority households, 4.7% of Black applicants and 5.1% of Hispanic applicants had high-cost mortgages in 2009, compared to 3.9% of lower income White households. This trend places the homes of minority households at greater risk for eviction, foreclosure, and bankruptcy.

C. Real Estate Practices

i. Prince George's County Association of Realtors

Prince George's County is served by the Prince George's County Association of Realtors. New members receive instruction in fair housing as part of the licensing requirements of the Maryland Division of Occupational and Professional Licensing. Prior to taking the real estate exams, each applicant is required to accumulate 60 hours of classroom instruction. Additionally, each agent must renew his or her license every two years. Between six and 15 hours of specified continuing education courses are required for license renewal. Fair housing training is required as part of the continuing education coursework for both the State of Maryland and Washington D.C. The Association provides regular fair housing trainings to meet the requirements of both jurisdictions. Fair housing classes are taught by education providers licensed through the Maryland Real Estate Commission.

D. Rental Advertising

Under federal law the making, printing, and publishing of advertisements that state a preference, limitation, or discrimination on the basis of race, color, religion, sex, handicap, familial status or national origin is prohibited. The prohibition applies to publishers, such as newspapers and directories. The prohibition also applies to persons and entities placing real estate advertisements.

Publishers and advertisers are responsible under federal law for making, printing, or publishing an advertisement that violates the Fair Housing Act in its face. Thus, they should not publish or cause to be published an advertisement that on its face expresses a preference, limitation or discrimination on the basis of race, color, religion, sex, handicap, familial status, or national origin. The law, as found in the Fair Housing Amendments Act of 1988, describes the use of words, photographs, symbols or other approaches that are considered discriminatory.

i. *The Bowie Blade-News*

For this AI, the real estate classifieds of *The Bowie Blade-News* for May 5, 2011 (available online), were reviewed. Additionally, *The Bowie Blade-News* has a searchable database for rental units in the Bowie and Annapolis areas, which was reviewed on May 10, 2011. In both the print edition and online database, the publisher's commitment to only print advertisements that



are in compliance with the Fair Housing Act are featured prominently. In the print edition, the publisher's statement is embedded in the text, while the policy is on the bottom of every webpage in the online searchable database.



5. Current Fair Housing Profile

i. Progress since Previous AI and Current Fair Housing Activities

Prince George's County's last AI was completed in 1996 as part of a regional AI developed by the Metropolitan Washington Council of Governments (COG). In the 1996 AI, nine impediments to fair housing were identified:

- Older units are located in inner beltway communities, which are generally LMI minority households. The County's current code enforcement only allows the County to close non-complying properties but does not provide for alternative housing.
- Hispanics are not adequately represented in the County's assisted housing programs.
- Lack of family public housing, which is listed as a barrier to affordable housing in the Consolidated Plan, is also a fair housing issue because families with children are a protected class under fair housing laws.
- The complaint volumes of the Fair Housing Council, HUD, and State and local human rights offices in Prince George's County show that race, disability, and familial status are the primary bases for allegations of housing discrimination in the County.
- A disproportionately high percentage of FHA/VA loans compared to the rest of the region, as well as lending-based complaints from County residents.
- The County should consider providing protection from housing discrimination based on source of income.
- There are insufficient fair housing educational and training programs in the County. There is not sufficient interagency coordination with the Departments of Family Services, Social Services, the Office of Child Support, and the Human Relations Commission regarding fair housing issues.
- Some advertisements for retirement and related communities are in violation of the Fair Housing Act's requirements with regard to the use of diverse models.
- Inadequate public support for AFFH.

To address these impediments, the AI established five priorities:

1. Provide a secure environment for promoting neighborhood diversity;
2. Provide Fair Housing education, training, and testing;
3. Provide technical assistance/capacity building;
4. Provide an environment conducive to celebrating neighborhood diversity; and
5. Provide job creation/job retention opportunities in the real estate, insurance, lending and appraisal industries.

Since the 1996 AI, the County has undertaken in a number of activities to address the impediments listed above. To address the issue of an aging housing stock, the County continues to use federal funds for housing rehabilitation programs to assist LMI households and accessibility modifications for persons with disabilities. In FY2010, the County assisted 931 households through its rehabilitation, down payment assistance, and rental assistance programs. Additionally, 96 households were received financial assistances for accessibility alterations. In 2005, the County contracted with the Metropolitan Washington COG and the Washington Area Housing Partnership to conduct a rental housing study to assess the housing needs in the area, in particular for LMI households.



The County has established a variety of partnerships to address fair housing complaints, lending discrimination, and fair housing education and outreach. The County partners with HRC, BNI, and the Maryland Commission on Human Relations to work and resolve complaints, although the County itself does not have enforcement authority. County staff also works with local lenders and Realtors to encourage participation in the County's Single Family Bond Program.

The County's support of the HRC has been a prominent tool to increase fair housing education and outreach. Each year the County provides funding to HRC (in FY2010, \$100,000 was allocated). Examples of HRC activities include:

- Participation in "Preventing Foreclosure Maryland State" workshop, where homeowners were able to:
 - Learn about Maryland's foreclosure preventive laws
 - Talk to housing counselors, banks, and pro bono attorneys
- Attending the "Fair Housing Matters" workshop sponsored by the Maryland Department of Housing and Community Development in partnership with Montgomery County Office of Human Rights and Department of Housing and Community Affairs. The free workshop was open to the public;
- Conducting fair housing trainings for County staff;
- The development of Prince George's County Fair Housing Community Outreach Committee;
- Attending national conferences, including the National Community Reinvestment Coalition (NCRC) conference and the IAOWRA (International Association of Human Rights Workers) annual conference; and
- Monitoring local newspapers to ensure compliance with the Fair Housing Act.

To encourage broader support of fair housing, the County has entered into partnership with industry representatives to promote the diverse communities that provide opportunities for everyone. Additionally, since the previous AI, the County has increased CDBG and other funds and in-kind support for fair housing activities, and an affordable rent policy that was put into effect to determine how the affordability of rents will be maintained with CDBG funds. The County also conducts monthly fair housing workshops for landlords and tenants and monitors sub-recipients of federal funds for compliance with fair housing laws.

ii. Other Fair Housing Organizations

1) Prince George's County Human Relations Commission

The Human Relations Commission (HRC) was established in 1974 under Division 12 of the County Code and serves the entire County. The primary function of HRC is to process, investigate, mediate, and conciliate discrimination complaints in Prince George's County. Unresolved complaints are then referred to the Maryland Commission on Human Relations, which has enforcement authority. As noted earlier, HRC is also responsible for a variety of fair housing activities throughout the County, including hosting workshops and conferences.



Prince George's County has in place the County HRC to process, investigate and conciliate housing discrimination complaints. However, the HRC has no enforcement authority.

The County's Human Relations Ordinance should be amended to grant the power of enforcement to the HRC. In this way, County residents can have access to a local entity when seeking enforcement and damages for housing discrimination.

2) Baltimore Neighborhoods, Inc (BNI)

Baltimore Neighborhoods, Inc (BNI) was founded in 1959 with a mission to promote "justice in housing for all people in the State of Maryland through fair housing and tenant-landlord programs and public information activities." BNI conducts landlord-tenant trainings and other outreach. Additionally, BNI monitors the enforcement of anti-discrimination laws, investigates complaints of housing discrimination, and conducts random paired testing to determine the existence of housing discrimination.

3) CASA de Maryland

CASA was founded in 1985 to improve the quality of life and legal justice for Latinos and low-income families through legal education, legal services, and advocacy projects. CASA offers a variety of educational and training programs for clients, as well as job services and advocacy programs. CASA employs a housing attorney who focuses on tenant associations, housing complaints, and landlord-issues. The organization does not accept complaints, and instead refers housing discrimination complaints to the Prince George's County HRC or Maryland Legal Aid.

6. General Fair Housing Observations

The following observations were noted throughout the previous sections of the AI. These issues are based on the primary research collected and analyzed and the numerous interviews and focus group sessions conducted for this report. They help to establish context for the impediments included in the following section. While none of these observations individually rose to the level of an impediment to fair housing choice in the Urban County and the City of Bowie, the issues remain noteworthy in that they establish context for subsequent sections of the AI.

- 1. The City of Bowie and to a lesser extent the Urban County have experienced significant demographic shifts since 1990, from predominantly White to predominantly Black communities.**

In 1990, Whites accounted for 40.5% and 91.3%, of the population in the Urban County and City of Bowie, respectively. By 2010, Blacks were the majority group in each jurisdiction, and the White population had decreased to 17.7% and 41.4%, respectively. Diversity among minorities also increased during this period in the Urban County, as both Asian and Hispanic populations increased significantly.

- 2. There are areas of minority concentration in 150 of the 151 census tracts in the Urban County and six areas of concentration in the City of Bowie.**

The large majority of these are concentrations of Black residents (121 census tracts in the Urban County and all six in Bowie). There are also three tracts of Asian concentration and 14 tracts of Hispanic concentration in the Urban County.

- 3. Prince George's County and the City of Bowie are moderately segregated, with respective dissimilarity indices of 51.0 and 41.6 for Blacks/Whites.**

This represents a decrease in both areas from the 2000 dissimilarity indices, reflective of an increase in Black residents and a decline in the number of White residents.

- 4. Despite being a relatively affluent community, median household incomes in Prince George's County remained significantly lower than those in the surrounding five counties.**

Prince George's County also had the highest poverty rate among the surrounding counties.

- 5. Members of the protected classes were more likely to live in poverty.**

There are 54 impacted areas in the Urban County and two in the City of Bowie, which include concentrations of both LMI persons and minorities. In the Urban County, 54 of 60 census tracts identified as concentrations of LMI persons were also areas of minority concentration. Consequently, in the Urban County, areas of minority concentration are significantly more likely also to be areas of concentration of LMI persons. In the City of Bowie, only two areas of minority concentration were also concentrations of LMI persons.

Black households and Hispanic households were less likely to have lower incomes (less than \$25,000) in the City of Bowie than elsewhere in Prince George's County. This reflects median household income trends, which show that median incomes for minorities in Bowie are higher than those in the County.



Persons with disabilities were more like to live in poverty than persons without disabilities. In Prince George's County, 12.8% of persons with a disability were living in poverty compared to 7.1% of persons without a disability. In Bowie, 3.2% of persons with a disability were living in poverty compared to 1.5% of persons without a disability.

Female-headed households with children accounted for more than half of all families living below the level of poverty in the Urban County and the City of Bowie. In the Urban County in 2000, female-headed households with children accounted for 52.3% of families living below the level of poverty and in Bowie, female-headed households with children accounted for 57.4% of families living in poverty. Consequently, securing affordable housing will be especially difficult for this segment of the population.

6. The sales housing market in Prince George's County is an inherently affordable one for households earning the median household income.

In 2010, 52% of the units sold were affordable to households earning \$70,753. By comparison, only 3.7% of units sold in 2006 (at the height of the housing market) were affordable to households earning median household income.

The median sales price in Prince George's County decreased more significantly than in neighboring counties. Over the past decade the median sales price in Prince George's County has been the lowest among the five counties which it borders. However, by 2010 the disparity among the counties had grown, and the median sales price in Prince George's County was more than \$90,000 less than in any of the surrounding counties.

The average sales price in Bowie decreased from \$288,771 in April 2010 to \$265,739 in March 2011. During this period, the average days on the market also increased from 87 to 97 days.



7. Impediments to Fair Housing Choice

The following observations collected during the development of the AI constitute the impediments or barriers to fair housing choice listed in this section. These impediments are linked to remedial strategies in the Fair Housing Action Plan.

The remaining observations collected during the development of the AI constitute the impediments or barriers to fair housing choice listed in this section. These impediments are linked to remedial strategies in the Fair Housing Action Plan, which is included in Section 8.

A. Public Sector

i. Urban County of Prince George's County

a. Black and Hispanic households have greater difficulty becoming home owners because of lower incomes.

Over three-quarters of White households in the Urban County were homeowners, compared to 62% of Blacks, 65.9% of Asians, and 55.4% of Hispanics, which reflects trends in median household incomes.

Prince George's County had the highest foreclosure rate in the state from 2010 to 2012. One in every 78 housing units in the County received a foreclosure filing in the third quarter of 2010, compared to 1 in every 166 housing units throughout the State. Nearly one-third (29.1%) of all foreclosure filings in Maryland were located in Prince George's County. By April 2012, HUD estimated that there were more than 6,248 foreclosure starts or REO completions in the County.

Median housing value increased 55.8% in the Urban County while real household income declined 5.2%. In Bowie, median housing value also outpaced real household income at slightly lower rates of 44.8% versus 3.2%. These trends indicate a greater likelihood that homebuyers will have difficulty purchasing housing units.

Proposed Action 1: Continue to offer financial incentives toward the creation of new home ownership opportunities through the County's My HOME Program and Neighborhood Stabilization Program (NSP). Ensure that the mortgage product is appropriate for the household applicant in terms of amount, cost, terms, etc.

Proposed Action 2: Continue to fund homeownership counseling and financial management education for lower income households, particularly minority households.

Proposed Action 3: Continue to enforce a Section 3 policy to ensure that employment and other economic and business opportunities generated by HUD assistance, to the greatest extent feasible, are directed to public housing residents and other LMI residents, particularly persons receiving government housing assistance, and business concerns that provide economic opportunities to low and very low income residents.

b. The Urban County's supply of decent, affordable housing remains inadequate.

The loss of affordable rental units over the past decade has been significant in both the Urban County and Bowie. In the Urban County, more than 47,000 units renting for less than \$750 a month were lost through price increases, demolition, conversion, etc. In Bowie, a total of 219 units in this price range were lost.

Nearly one-third of Section 8 applicants (equivalent to 930 households) were waiting for units with three or more bedrooms. This suggests a need for affordable rental units that

Urban County of Prince George's County and the City of Bowie



are appropriately sized for larger families. This relative lack of affordable larger rental units disproportionately impacts minority households, who have a tendency to live in larger families.

Minority households were more likely than Whites to have housing problems in the Urban County and Bowie. In the Urban County, Hispanics were most likely to have a housing problem, with 77.4% of Hispanic renter households and 81.5% of Hispanic homeowners having at least one housing problem. In Bowie, 85.2% of Black renters and 85% of Black homeowners had a housing problem.

Minimum-wage earners and single-wage-earning households cannot afford a housing unit renting for the HUD fair market rent in Prince George's County. Minorities and female-headed households are disproportionately impacted due to their lower incomes.

Individuals whose sole source of income is a \$674 monthly SSI check cannot afford to rent a zero-bedroom unit in Prince George's County at the HUD fair market rent of \$1,156. This situation disproportionately impacts persons with disabilities whose only source of income may be their SSI checks.

Of the 49,197 acres zoned for medium density development in the County, only 1,540 acres (3.3%) are developable. At a maximum permitted density of 12 dwelling units per acre, this translates to a maximum potential of 18,480 dwelling units. Of the 10,630 acres zoned for high density development, only 397 acres (3.7%) are developable. At a maximum permitted density of 20 dwelling units per acre, this translates to a maximum potential of 7,940 dwelling units. The County should commit to ensuring that at least 20% (equivalent to 5,284 units) of these units are developed for households below 80% of median household income.

The County's Zoning Ordinance includes creative, alternative design options for mixed-use developments strategically located in close proximity to mass transit. These design concepts are excellent opportunities to require a minimum set-aside of new multi-family housing units for households below 80% of median household income.

Public transit options are greatest in the northern and central areas of the County. New residential developments in these areas would be ideally suited for affordable housing incentives. By requiring an affordable housing set-aside and providing financial incentives, the County could expand fair housing choice in locations advantageous to transit-dependent households of members of the protected classes.

Proposed Action 1: Continue CDBG-funded rehabilitation activities to improve the quality of the existing affordable housing stock, where feasible.

Proposed Action 2: Continue the City's systematic code enforcement policy to improve and preserve the existing multi-unit affordable housing stock.

Proposed Action 3: Award a higher preference for new affordable housing projects that include three or more bedrooms. Increase the HOME per-unit subsidy if necessary.

Proposed Action 4: Develop and adopt a Moderately Priced Housing Ordinance. There is the potential for the development of over 24,000 multi-family dwelling units to be constructed in the County based on the available and developable land zoned for medium and high density housing. Most of this land is located in non-impacted areas of the Urban County. If 20% of these units (equivalent to 5,284 units) were constructed and set-aside for households below 80% of median household income, fair housing choice would be dramatically expanded for members of the protected classes.



Proposed Action 5: Establish and capitalize a County Housing Trust Fund with a dedicated source of revenue. For example, setting aside a certain amount per \$100 of assessed value of real estate property revenue could provide significant funding for such an initiative. A few counties and cities surrounding Prince George's County have enacted housing trust funds, which have provided financing for thousands of affordable housing units over the past two decades.

c. **The County's supply of affordable housing that is accessible to persons with disabilities is inadequate.**

More than half of the public housing waiting list applicants include family members with disabilities. However, it is unknown how many of these households require an accessible unit.

Proposed Action 1: The DHCD should continue its working relationship with the ADA Coordinator in the Department of Family Services and collaborate on accessibility training and compliance issues. Specifically, fair housing training on housing accessibility should be continued for landlords, property managers, architects, builders (including nonprofit organizations), engineers, and code enforcement officials.

Proposed Action 2: The Urban County should, at the very least, require that all new and substantially rehabilitated CDBG- and HOME-assisted units comply with visitability standards. To ensure compliance with this requirement, collaborate with the County's ADA Coordinator to conduct site visits prior to the issuance of occupancy permits.

d. **Although the Urban County targets redevelopment and revitalization activities to impacted areas, it must also seek a balance with investing in affordable housing in non-impacted areas.**

The Urban County targets the revitalization and redevelopment of LMI and minority neighborhoods. Although these impacted areas need investment to improve the quality of life for residents, the Urban County must strive to seek a balance with investing in non-impacted areas. Affirmatively furthering fair housing involves expanding housing choice for members of the protected classes to non-impacted areas of Prince George's County.

Proposed Action 1: In developing policy priorities for the use of CDBG and HOME funds, the Urban County should give first priority to the use of HOME and CDBG funds for new family rental and sales developments on sites in non-impacted areas.

Proposed Action 2: As part of the Consolidated Planning process, map the location of all new CDBG/HOME-assisted housing projects. Analyze this information to determine the relative breakdown of projects in impacted areas versus projects in non-impacted areas. Establish internal goals for achieving balance relative to projects in impacted areas versus projects in non-impacted areas. Consider the results of the analysis before finalizing funding decisions. Include this analysis in the CAPER.

e. **The Urban County should revise its entitlement funding application and review processes to ensure fair housing**

The Urban County should amend its application review process for units of local government to include a degree of due diligence relative to fair housing. The Urban County should, for example, review the zoning ordinance of any municipality for which CDBG or HOME funding is requested. If discriminatory provisions are identified in the



ordinance, the Urban County should not approve entitlement funding until the impediment to fair housing choice is eliminated.

The Urban County should make affirmatively furthering fair housing the over-arching goal of all HOME-assisted activities.

The Urban County should reconsider requiring the support of elected officials and the community for new affordable housing projects. If such support is not required or sought for market-rate multi-family housing developments, then it should not be required for affordable housing developments. The only difference between the two is the source of financing, and public financing is typically used to development housing for members of the protected classes (i.e., families, persons with disabilities, etc.) This policy is discriminatory. The local land use approval process should be the sole factor in determining the need for public notification or support.

If the Urban County does not have an affirmative marketing policy that applies to all CDBG- and HOME-assisted housing projects with five or more units, it must prepare and adopt one. Such a policy requires developers to advertise the availability of rental units assisted with these funds to persons who are least likely to apply for them.

Proposed Action 1: The Urban County should continue to review applications for CDBG and HOME funds to ensure compliance with all appropriate statutes, regulations and policies. Recommendations for funding should be made to the County Council.

Proposed Action 2: Fair housing training should be provided to department heads and the executive leadership of the County to ensure the decision-making process affirmatively furthers fair housing.

Proposed Action 3: The DHCD should require fair housing training as a mandatory component of the local government application process. If making this element mandatory is not possible, then DHCD staff should strongly encourage local government applicants to receive fair housing training as part of the application process. By requiring that the elected municipal officials attend the training, the Urban County is further ensuring compliance with its fair housing policy and certifications relative to the CDBG and HOME programs.

Proposed Action 4: Priority should be given to new multi-family rental housing projects proposed in non-impacted areas. The County should increase the per-unit subsidy to provide more incentives to developers to seek project sites outside of impacted areas.

Proposed Action 5: The Urban County should revise its policy and eliminate the requirements that support from the community and elected officials are needed if public financing is used in a housing project.

Proposed Action 6: If the Urban County does not have an affirmative marketing policy that applies to all CDBG- and HOME-funded housing projects with five or more units, it must prepare and adopt one.

f. **The County's Human Relations Commission (HRC) does not have enforcement authority with regards to fair housing complaints.**

The Urban County should amend its application review process for units of local government to include a degree of due diligence relative to fair housing. The Urban County should, for example, review the zoning ordinance of any municipality for which



CDBG or HOME funding is requested. If discriminatory provisions are identified in the ordinance, the Urban County should not approve entitlement funding until the impediment to fair housing choice is eliminated.

Prince George's County has in place the County HRC to process, investigate and conciliate housing discrimination complaints. However, the HRC has no enforcement authority.

Proposed Action: The County's Human Relations Ordinance should be amended to grant the power of enforcement to the HRC. In this way, County residents can have access to a local entity when seeking enforcement and damages for housing discrimination.

g. **The County's General Plan fails to achieve its potential as a mechanism to affirmatively further fair housing and expand the supply of affordable housing.**

The County's General Plan has specific goals to increase average housing value as well as to reduce the number of distressed, low-income rental units. However, the Plan lacks a detailed Housing Element. By increasing its tax base and decreasing the number of distressed and dilapidated rental units, the County has the potential to increase the quality of its housing stock. However, without an explicit goal to maintain and preserve the affordable rental housing stock for families, these policies may result in increasingly unaffordable rental and owner housing stocks for lower-income households. Furthermore, there is no policy indicating how the County will deconcentrate areas of low-income rental units. Ideally, these issues should be adequately addressed in a Housing Element of the General Plan in the context of the critical linkages between affordable housing, public transit routes/stops, and entry-level employment opportunities.

The County's General Plan should include a stronger statement of the City's over-arching policies aimed at affirmatively furthering fair housing choice. The stated policies should extend to all aspects of County government, not just its HUD programs.

Proposed Action 1: Include a Housing Element in the General Plan when it is updated in 2012. A Housing Element should include an over-arching statement of fair housing policy, support for affordable housing for both renter and owners and respect for racial, ethnic and economic diversity.

Proposed Action 2: Take steps to ensure that the County's fair housing policy extends to all aspects and departments of County government, not just its HUD Programs. Take steps to ensure that all department heads and elected officials understand the County's responsibility to affirmatively further fair housing. Department heads and elected officials should, in turn, take steps to impart an understanding of this policy to staff and the public-at-large.

h. **The majority of fair housing complaints filed through HUD in Prince George's County involved race and disability as the bases for discrimination.**

Disability and race were the primary bases for alleging discrimination in the Urban County and Bowie. These trends indicate a need for testing, fair housing education and outreach, and enforcement of fair housing laws.

Prince George's County has HRC to process, investigate and conciliate housing discrimination complaints. However, the HRC has no enforcement authority.

In FY2010, the City's CDBG entitlement grant was \$6,525,969; of this amount, \$100,000 (equivalent to 1.5% of the entitlement amount) was dedicated to fair housing activities.

The County does not have an abundance of fair housing advocacy organizations or a formal system for intake/referral of fair housing complaints. It is unlikely that a member of a protected class in the County that feels victimized by housing discrimination would take the time and effort to seek out support from BNI in Baltimore. A highly publicized local process for responding to fair housing complaints would be a valuable commodity in Prince George's County that would demonstrate the County's commitment to affirmatively further fair housing.

Proposed Action 1: Continue to budget between 1.5% and 2.0% of the Urban County's annual CDBG entitlement grant for activities such as education and outreach, enforcement, and testing.

Proposed Action 2: Contract with an experienced FHIP agency to perform paired testing of rental housing.

Proposed Action 3: Amend the County's Human Relations Ordinance to give enforcement authority to the Human Relations Commission.

- i.* The accessibility features of the County's public housing stock were last analyzed in 1993. Though units have not been added to the inventory since, the County should update its Section 504 Needs Assessment to ensure that its inventory meets current standards of accessibility and that the needs determined in the 1993 assessment have been met.

Public housing is an important resource for persons with mobility and sensory impairments. Section 504 of the Rehabilitation Act of 1973 establishes accessibility standards for public agencies, including housing authorities. HUD's regulations at 24 CFR Part 8 implement Section 504 of the Rehabilitation Act of 1973. HUD's PIH Notice 2010-26 encourages PHAs to conduct Section 504 needs assessments and self-evaluations on a regular basis.

Section 504 requires at least 5% of the PHA's public housing stock to be accessible to persons with mobility impairments and another 2% of the public housing stock to be accessible to persons with sensory impairments. In addition, Section 504 requires Authority administrative offices and other non-housing facilities to be accessible. Section 504 establishes the Uniform Federal Accessibility Standards (UFAS) as the controlling standard for accessibility.

HAPGC has made alterations to properties based on the 1993 Section 504 Needs Assessment, modifying high-rise buildings for the elderly to meet the required percentages of accessible units. No new units have been added to the inventory since the last assessment. The Authority has determined that it would be infeasible to retrofit townhouse units for families with bedrooms above the first floor to meet wheelchair-bound mobility standards. To assist applicants or tenants who need mobility-accessible units and cannot be accommodated in the public housing inventory, HAPGC provides housing choice vouchers and assistance locating accessible units.

Proposed Action: HAPGC should update its Section 504 Needs Assessment to ensure that its inventory meets current standards for accessibility and that the goals set in the 1993 Assessment have been met. Efforts to spread accessibility features across more sites, to the extent that they are feasible, would further expand fair housing choice



for persons with disabilities to the degree that they would not be restricted to only those communities with UFAS-accessible units. The plan should be carried out in accordance with Section I(A) of HUD PIH Notice 2010-26. HAPGC should also take steps to include persons/residents with disabilities and local disability advocates in the accessibility planning process.

j. Further actions on the part of the Urban County and the Housing Authority would enhance the extent to which members of the protected classes have access to participation in planning, policy and program offerings.

In Prince George's County, there are more than 61,000 persons who speak English less than "very well," two-thirds of whom are native Spanish speakers. Given the population expansion of Hispanic residents in recent years, public agencies will need to ensure that their policies and programs are adequately accessible to persons with limited English proficiency.

Limited data is available on the demographic composition of appointed public volunteer boards and commissions dealing with housing-related issues in the County. A representative complement of diversity in these decision-making and recommendation-generating bodies ensures that their unique needs and experiences are reflected in the County's approach to housing.

Proposed Action: The Urban County and HAPGC should conduct the four-factor analysis to determine the extent to which their programs are adequately accessible to potential beneficiaries with limited English proficiency. The four-factor analysis is detailed in the *Federal Register* dated January 22, 2007.

Proposed Action: The Urban County should maintain records of the demographic characteristics of residents appointed to boards and commissions dealing with housing-related issues. Such a practice would help to ensure that members of the protected classes are represented proportionally to their share of the general population.

ii. **City of Bowie**

a. The City does not allocate any of its CDBG entitlement funds to fair housing activities.

In FY2010, the City's CDBG entitlement was \$174,744; however, none of this grant was allocated for fair housing activities. Although Bowie's CDBG entitlement is small, the City has an obligation to affirmatively further fair housing. Allocating 1% of its annual fair housing activities, equivalent to approximately \$1,700, would enable the City to implement worthwhile activities such as fair housing education and outreach.

Proposed Action: The City should allocate 1% of its annual CDBG entitlement grant to carry out fair housing activities.



B. Private Sector

a. Mortgage loan denials and high-cost lending disproportionately affect minority applicants in Prince George's County, similar to national trends.

The mortgage denial rates for Blacks and Hispanics maintained the highest levels in 2007 and 2008. In 2009, denial rates for Blacks and Hispanics both continued their precipitous declines, in contrast to the slower rate declines for Asians. In 2009, the loan denial rate for Black households was 11.1% and for Hispanic households, 13.9%. For Asian households, the denial rate was 12.8%. For White households, the denial rate was significantly lower at 9.4%.

Upper income minority households experienced denial rates significantly higher than those of White upper income households. Among upper income Black and Hispanic households in 2009, mortgage denial rates were 9.4% and 9.7%, respectively, compared to a denial rate of 5.6% among Whites. While this fact alone does not imply an impediment to fair housing, the pattern is consistent with discrimination.

Of the 62 tracts with denial rates greater than or equal to 10% in 2009, 24 were in impacted areas.

Minority households are disproportionately represented among recipients of high-cost mortgage loans, particularly among lower income households. Among upper income households, Blacks were four times as likely as Whites to have a high cost loan and Hispanics were twice as likely. Among lower income minority households, 4.7% of Black applicants and 5.1% of Hispanic applicants had high-cost mortgages in 2009, compared to 3.9% of lower income White households. This trend places the homes of minority households at greater risk for eviction, foreclosure, and bankruptcy. This trend places the homes of minority households at greater risk for eviction, foreclosure, and bankruptcy.

The County has begun work with TRF to gather and analyzed housing market data in the County, with the goal of creating a foreclosure intervention strategy. This would enable the County to target resources to areas where loan discrimination, mortgage delinquencies and foreclosures are severely affecting communities.

Proposed Action 1: The Urban County should engage HUD-certified housing counselors to target credit repair education through existing advocacy organizations that work extensively with minorities.

Proposed Action 2: The Urban County should conduct a more in-depth analysis of HMDA data to determine if discrimination is occurring against minority applicant households. Consider contracting with an experienced fair housing advocacy organization to conduct mortgage loan testing.



8. Fair Housing Action Plan

Based on the identified impediments to fair housing choice and the proposed actions included in Section 7, the following Fair Housing Action Plan has been developed. The format of this chart should more easily facilitate the completion of the Urban County's and City's Annual Action Plan and CAPER documents. Each year during the Annual Plan process, the Urban County and City of Bowie will identify the strategies it will undertake to affirmatively further fair housing. At the end of each program year, progress made toward achievement of the strategies will be reported in the Urban County's and City's CAPERs.

**Figure 8-1
Fair Housing Action Plan**

	Planned Action Year					Responsible Entity
	2013	2014	2015	2016	2017	
Goal: Broaden home ownership opportunities for members of the protected classes						
Task: Continue to offer financial incentives toward the creation of new home ownership opportunities through the County's My HOME program and NSP. Ensure that mortgage products are appropriate for the applicant in terms of amount, cost, terms, etc.	•	•	•	•	•	DHCD
Task: Continue to fund home ownership counseling and financial management education for lower-income households, particularly minorities	•	•	•	•	•	County DHCD, City of Bowie
Task: Continue to enforce a Section 3 policy to ensure that employment and other economic and business opportunities generated by HUD assistance are directed to public housing residents and other LMI residents	•	•	•	•	•	County DHCD, City of Bowie
Goal: Expand the supply of decent, affordable housing available in the Urban County						
Task: Continue CDBG-funded rehabilitation activities to improve the quality of the existing affordable housing stock where feasible	•	•	•	•	•	County DHCD, City of Bowie
Task: Continue the City's systematic code enforcement policy to improve and preserve the existing multi-unit affordable housing stock.	•	•	•	•	•	City of Bowie
Task: Award a higher preference in entitlement allocations for new affordable housing projects for families. Increase the HOME per-unit subsidy if necessary.		•	•	•	•	DHCD/ County Council
Task: Develop and adopt a Moderately Priced Housing Ordinance that includes an affordable housing set-aside for new residential development.			•			County Council
Task: Establish and capitalize a County Housing Trust Fund with a dedicated source of revenue to provide financing for affordable housing units.					•	County Council

cont'd ...



	Planned Action Year					Responsible Entity
	2013	2014	2015	2016	2017	
Goal: Expand the supply of affordable housing accessible to persons with disabilities						
Task: Continue working with the ADA Coordinator in the DFS to collaborate on accessibility training and compliance issues, specifically, training on housing accessibility	•					DHCD
Task: Require that all new and substantially rehabilitated CDBG- and HOME-assisted units comply with visitability standards. Conduct site visits prior to the issuance of occupancy permits.		•				County DHCD, City of Bowie
Goal: Balance investment in revitalizing impacted areas with investment in expanding affordable housing options in opportunity-rich neighborhoods						
Task: In developing policy priorities for CDBG and HOME funds, give first priority to the use of funds for new family rental and sales developments in non-impacted areas.		•	•	•	•	County Council
Task: As part of the Consolidated Planning Process, map the location of all new CDBG/HOME-assisted projects; analyze this information to determine the relative breakdown of projects in impacted/ non-impacted areas. Establish internal goals for achieving balance, include this analysis in each year's CAPER.	•	•	•	•	•	County DHCD, City of Bowie
Goal: Ensure that the entitlement funding application and review processes affirmatively further fair housing						
Task: Continue to review applications for CDBG and HOME funds to ensure compliance with all appropriate statutes, regulations and policies. Recommendations for funding should be made to County Council.	•	•	•	•	•	County DHCD, City of Bowie
Task: Provide fair housing training to department heads and executive leadership to ensure that decision-making affirmatively furthers fair housing	•	•	•	•	•	County DHCD, City of Bowie
Task: Require fair housing training as a mandatory component of the local government application process, or at least strongly encourage local government applicants to receive fair housing training as part of the process.	•	•	•	•	•	DHCD
Task: Eliminate requirements that support from the community and elected officials is needed if public financing is used for a housing project.	•					DHCD/County Council
Task: If the County does not have an affirmative marketing policy that applies to all CDBG- or HOME-assisted housing projects with five or more units, it must prepare and adopt one.	•					DHCD
Goal: Increase the capacity of the Human Relations Commission						
Task: Amend the Human Relations Ordinance to grant the power of enforcement to the HRC. In this way, County residents can have access to a local entity when seeking enforcement and damages for housing discrimination.			•			County Council

cont'd ...

Analysis of Impediments to Fair Housing Choice



	Planned Action Year					Responsible Entity
	2013	2014	2015	2016	2017	
Goal: Incorporate fair housing principles across government						
Task: Include a Housing Element in the County General Plan when it is updated, including an over-arching statement of fair housing policy, support for affordable housing for both renters and owners and respect for racial, ethnic and economic diversity.	•					
Task: Take steps to ensure that the fair housing policy extends to all aspects and departments of local government. Ensure that all department heads understand the County's/City's responsibility to affirmatively further fair housing. Department heads and elected officials should, in turn, take steps to impart an understanding of this policy to staff and the public.	•	•	•	•	•	
Goal: Broaden general awareness of rights and responsibilities related to fair housing						
Task: The City of Bowie should allocate 1% of its annual CDBG entitlement grant to carry out fair housing activities.	•	•	•	•	•	City of Bowie
Task: The Urban County should continue to allocate 1.5% to 2% of its annual CDBG grant for such activities as education and outreach, enforcement and testing.	•	•	•	•	•	DHCD
Task: Contract with an experienced FHIP agency to perform paired testing of rental housing.		•		•		City of Bowie
Goal: Ensure that public housing meets the accessibility needs of residents and applicants						
Task: Update the Section 504 Needs Assessment to ensure that the inventory meets current standards for accessibility and that the goals set in the 1993 assessment have been met.	•					HAPGC
Task: To the extent practical, take advantage of opportunities to spread accessibility features across more communities, so that UFAS-accessible units are available in various locations.	•	•	•	•	•	HAPGC
Goal: Enhance the extent to which members of the protected classes have access to participation in County planning, policy and program offerings.						
Task: Conduct the four-factor analysis (detailed in the Federal Register dated 1/22/2007) to determine the extent to which programs are adequately accessible to potential beneficiaries with limited English proficiency.		•				DHCD, HAPGC, City of Bowie
Task: Maintain records of the demographic characteristics of residents appointed to boards and commissions dealing with housing-related issues, work toward representation of members of the protected classes proportional to their presence in the general population.		•		•		
Goal: Address the disproportionate impact of mortgage loan denials and high-cost lending on minority applicants						
Task: Engage HUD-certified housing counselors to target credit repair education through existing advocacy organizations that work extensively with minorities.		•	•	•	•	DHCD
Task: Conduct a more in-depth analysis of HMDA data to determine if discrimination is occurring against minority applicants.	•					DHCD



9. Signature Page for the Urban County

By my signature I certify that the Analysis of Impediments to Fair Housing Choice for the Urban County is in compliance with the intent and directives of the regulations of the Community Development Block Grant Program.

Rushern L. Baker, III, County Executive

Date



10. Signature Page for the City of Bowie

By my signature I certify that the Analysis of Impediments to Fair Housing Choice for the City of Bowie is in compliance with the intent and directives of the regulations of the Community Development Block Grant Program.

G. Frederick Robinson, Mayor

Date



11. Appendix A – Stakeholder Chart

Type of Organization	Contact Name	Name of Organization
Human Relations Commission	James Grier	PGC HRC
	Debora Bush/Stella Adams	PGC HRC
	Nicole Young (interviewed 11/8/10)	
	Amani Yates (interviewed 11/8/10)	PGC HRC
Community Development, HOME, NSP staff	Shirley Grant (interviewed 11/9/10)	DHCD/CDP
	Dianne R. Thomas (interviewed 11/9/10)	DHCD/CDP
	Nicole Garrett (interviewed 11/9/10)	DHCD
	Roz Clemens (interviewed 11/9/10)	DHCD
	Mary Wheeler (interviewed 11/9/10)	DHCD
	Adrienne Bennett (interviewed 11/9/10)	DHCD
Building Code Dept.	Behdad A. Kashanian	Inspections Group (LIG)
	Edmund Kalie (interviewed 11/8/10)	Inspections Group (LIG)
Section 8 HCV Staff	Carla Carter (interviewed 11/9/10)	Housing Authority
Public Housing Staff	Carla Carter (interviewed 11/9/10)	Housing Authority
Advocacy organizations for persons with mobility impairments and other disabilities	Patricia Sanders (interviewed 11/10/10)	PGC Department of Family Services
	Patricia Morris (interviewed)	PGC Department of Family Services
	John Baker	Equal Rights Center
	Nathan Hill	Equal Rights Center
	Bea Rogers	Independence NOW
Local human rights organization/s that deal directly with fair housing complaints, including FHAP and FHIP	Stephanie Cornish (interviewed 11/10/10)	Baltimore Neighborhoods, Inc. (BNI)
Realtors Association or friendly residential real estate salesperson	PGC Assoc of REALTORS	PGC Assoc of REALTORS
	Laura Pitt	Land Acquisition and Real Property Division
Planning and zoning department	Ivy Lewis (interviewed 11/8/10)	Maryland-National Capital Park and Planning Commission
	Deirdra Farmer-Lee	Office of Central Services
	Denise Hutchins-Cole	Facilities Operation & Management Division



Type of Organization	Contact Name	Name of Organization
Public transit agency	James E. Raszewski	Office of Transportation
	Haitham A. Hijazi, Director	Department of Public Works and Transportation
Other Entities	Sherry White Talbert	Citizen Services
	Sylvia Taylor	Office of Community Relations (OCR)
Housing providers, developers and managers of affordable housing, CHDOs, group home operators, etc.	Graciela Aponte (interviewed 3/10/11)	National Council of La Raza
	James A. Brown, Jr.	Victory Housing Inc.
	representative (interviewed 3/10/11)	KAIROS Development
	Donna Hurley (interviewed 3/10/11)	Housing Options and Planning Enterprises (HOPE)
	Kim Propeake (interviewed 3/10/11)	Casa de Maryland



12. Appendix B – Data Tables



Figure 12-1
Areas of Racial and Ethnic Concentration in the Urban County, 2009

	Total Population	Race/Ethnicity			
		White	Black	Asian	Hispanic
Urban County	781,414	21.6%	65.2%	4.0%	12.8%
Census Tract 8001.06	2,641	28.7%	56.4%	5.0%	17.0%
Census Tract 8002.02	5,836	35.7%	54.1%	6.9%	6.8%
Census Tract 8002.06	4,142	25.8%	65.0%	3.4%	3.5%
Census Tract 8002.07	4,748	25.8%	61.4%	1.9%	16.2%
Census Tract 8002.09	3,858	20.4%	69.3%	3.8%	13.7%
Census Tract 8002.10	2,876	23.8%	58.0%	5.6%	24.6%
Census Tract 8002.11	2,800	27.4%	59.2%	9.4%	1.8%
Census Tract 8004.06	10,612	30.1%	59.5%	5.8%	8.0%
Census Tract 8004.07	7,327	14.1%	69.5%	10.2%	9.1%
Census Tract 8004.08	6,379	26.7%	62.0%	5.5%	5.2%
Census Tract 8005.03*	3,923	13.9%	75.6%	5.1%	3.6%
Census Tract 8005.04*	431	54.1%	0.0%	45.9%	0.0%
Census Tract 8005.07	3,073	38.8%	56.8%	0.0%	1.4%
Census Tract 8005.08	4,373	12.1%	85.5%	1.5%	1.3%
Census Tract 8005.09	5,208	1.2%	95.1%	0.9%	1.1%
Census Tract 8005.11	5,005	39.1%	55.2%	2.1%	4.8%
Census Tract 8005.12	6,254	26.8%	63.8%	4.4%	3.3%
Census Tract 8006.01	1,763	9.3%	86.2%	0.7%	5.2%
Census Tract 8006.03	8,449	11.1%	84.6%	0.8%	1.1%
Census Tract 8006.04	1,711	7.0%	91.9%	1.1%	2.2%
Census Tract 8006.05	5,706	12.3%	82.5%	1.6%	4.5%
Census Tract 8006.06	4,398	11.9%	82.6%	0.0%	2.3%
Census Tract 8007.01	5,309	10.8%	87.0%	2.2%	3.1%
Census Tract 8007.02	5,910	14.1%	78.1%	3.2%	1.4%
Census Tract 8007.03	9,186	20.9%	76.2%	0.9%	1.1%
Census Tract 8010.01	6,731	34.8%	61.8%	0.7%	2.8%
Census Tract 8010.02	8,255	12.5%	80.3%	1.1%	6.3%
Census Tract 8012.02	7,085	16.6%	77.8%	1.0%	4.9%
Census Tract 8012.03	7,488	14.0%	77.2%	3.8%	1.4%
Census Tract 8012.04	7,230	14.1%	75.9%	4.4%	3.7%
Census Tract 8012.05	6,448	28.6%	67.5%	0.7%	3.6%
Census Tract 8012.06	7,763	16.7%	79.7%	0.7%	4.0%
Census Tract 8012.07	4,354	20.2%	74.5%	2.6%	3.0%
Census Tract 8013.01	11,592	15.6%	75.6%	3.3%	4.7%
Census Tract 8013.05	5,659	5.5%	77.7%	11.3%	4.5%
Census Tract 8013.06	6,639	15.7%	69.1%	9.8%	7.2%
Census Tract 8013.07	3,713	18.3%	71.9%	5.2%	7.9%
Census Tract 8013.08	3,918	4.7%	73.6%	6.9%	8.1%
Census Tract 8013.09	3,242	33.1%	53.6%	3.2%	3.0%
Census Tract 8014.02	5,552	10.6%	76.2%	3.7%	9.2%

* This data reflects only the portion of the tract within the Urban County.

Source: 2005-2009 American Community Survey (B01003, B02001, B03001)



	Total Population	Race/Ethnicity			
		White	Black	Asian	Hispanic
Census Tract 8014.03	7,457	19.4%	61.8%	15.1%	10.3%
Census Tract 8014.04	4,602	15.2%	64.5%	11.7%	4.6%
Census Tract 8014.05	4,334	20.8%	50.2%	9.2%	30.9%
Census Tract 8014.06	2,932	4.7%	89.4%	2.4%	2.7%
Census Tract 8014.07	6,179	4.8%	91.3%	0.7%	1.7%
Census Tract 8015.00	2,653	13.9%	70.0%	7.3%	8.1%
Census Tract 8016.00	2,829	2.3%	91.4%	0.0%	5.8%
Census Tract 8017.01	3,907	7.8%	88.6%	0.4%	5.0%
Census Tract 8017.02	3,963	7.7%	89.7%	1.2%	1.8%
Census Tract 8017.04	5,462	1.1%	90.4%	2.5%	5.8%
Census Tract 8017.06	1,441	3.9%	95.4%	0.0%	0.0%
Census Tract 8017.07	5,588	2.6%	94.2%	2.5%	0.9%
Census Tract 8017.08	3,424	12.6%	87.1%	0.0%	7.5%
Census Tract 8018.01	2,124	7.9%	91.3%	0.4%	3.3%
Census Tract 8018.02	3,961	2.1%	97.5%	0.0%	0.0%
Census Tract 8018.04	1,998	13.4%	86.1%	0.0%	5.4%
Census Tract 8018.05	2,236	8.3%	91.7%	0.0%	6.4%
Census Tract 8018.07	4,994	7.3%	88.4%	0.0%	3.6%
Census Tract 8018.08	3,576	5.7%	89.7%	0.0%	5.9%
Census Tract 8019.01	4,699	16.9%	76.4%	2.8%	2.2%
Census Tract 8019.02	7,059	4.0%	93.7%	0.0%	0.7%
Census Tract 8019.04	3,351	26.5%	66.5%	0.0%	19.8%
Census Tract 8019.05	4,803	15.3%	78.0%	0.0%	5.4%
Census Tract 8019.06	2,373	18.0%	75.2%	1.1%	4.3%
Census Tract 8020.01	5,845	10.5%	86.4%	0.3%	9.8%
Census Tract 8020.02	3,695	2.3%	94.2%	0.0%	1.9%
Census Tract 8021.03	2,788	8.8%	85.0%	0.0%	2.2%
Census Tract 8021.04	2,040	9.5%	85.0%	2.5%	7.3%
Census Tract 8021.05	8,312	0.7%	97.8%	0.0%	0.7%
Census Tract 8022.01	1,962	16.9%	76.0%	3.8%	0.0%
Census Tract 8022.03	5,078	6.5%	85.8%	0.5%	6.6%
Census Tract 8022.04	5,958	6.4%	89.6%	0.8%	2.4%
Census Tract 8023.01	3,785	12.3%	83.8%	0.0%	4.6%
Census Tract 8024.03	5,798	7.0%	90.8%	0.5%	1.8%
Census Tract 8024.04	4,652	6.4%	92.4%	0.0%	1.3%
Census Tract 8024.05	3,512	3.0%	90.1%	1.0%	2.6%
Census Tract 8024.06	2,253	9.7%	87.4%	0.5%	6.7%
Census Tract 8025.01	3,366	5.3%	89.6%	0.0%	5.9%
Census Tract 8025.02	2,413	8.6%	88.7%	0.0%	9.2%
Census Tract 8026.00	3,342	0.0%	93.4%	0.0%	6.5%
Census Tract 8027.00	2,334	12.0%	87.1%	0.4%	4.2%
Census Tract 8028.03	4,760	3.4%	92.5%	2.0%	1.7%
Census Tract 8028.04	5,549	2.0%	97.1%	0.9%	0.0%
Census Tract 8028.05	4,721	3.1%	95.8%	0.9%	1.5%
Census Tract 8029.01	4,339	4.4%	89.3%	0.0%	6.3%
Census Tract 8030.01	3,056	6.0%	85.8%	1.4%	10.4%
Census Tract 8030.02	2,879	1.0%	98.3%	0.0%	1.3%
Census Tract 8031.00	2,517	7.8%	89.3%	0.0%	9.9%

* This data reflects only the portion of the tract within the Urban County.

Source: 2005-2009 American Community Survey (B01003, B02001, B03001)

Urban County of Prince George's County and the City of Bowie



	Total Population	Race/Ethnicity			
		White	Black	Asian	Hispanic
Census Tract 8032.00	3,139	1.1%	95.6%	0.0%	4.1%
Census Tract 8033.00	4,196	5.2%	92.1%	1.9%	3.4%
Census Tract 8034.01	1,376	3.9%	87.4%	0.0%	6.9%
Census Tract 8034.02	4,777	4.0%	92.3%	0.0%	4.3%
Census Tract 8035.05	6,678	3.8%	91.7%	1.9%	2.2%
Census Tract 8035.08	4,650	11.9%	83.9%	0.4%	14.4%
Census Tract 8035.09	2,283	1.1%	94.5%	0.0%	4.5%
Census Tract 8035.12	5,447	2.3%	94.0%	2.0%	1.1%
Census Tract 8035.13	4,684	4.6%	91.8%	1.0%	3.3%
Census Tract 8035.14	3,974	1.8%	95.0%	0.8%	1.3%
Census Tract 8035.15	7,334	1.8%	89.1%	5.5%	0.3%
Census Tract 8035.16	4,327	11.1%	80.6%	5.7%	3.4%
Census Tract 8035.17	8,392	8.1%	84.5%	4.6%	1.0%
Census Tract 8035.18	6,356	2.6%	83.3%	8.7%	2.5%
Census Tract 8035.19	3,168	7.1%	86.2%	1.0%	7.4%
Census Tract 8036.01	3,456	8.1%	89.6%	2.3%	5.1%
Census Tract 8036.02	1,774	0.0%	99.5%	0.0%	0.0%
Census Tract 8036.05	6,650	36.9%	52.6%	2.0%	27.9%
Census Tract 8036.06	5,616	32.3%	37.3%	7.5%	31.8%
Census Tract 8036.07	3,362	26.1%	58.2%	2.9%	13.4%
Census Tract 8036.08	4,908	18.0%	67.6%	7.6%	14.5%
Census Tract 8036.10	3,677	45.4%	46.5%	3.6%	36.0%
Census Tract 8036.12	3,158	9.3%	82.3%	4.4%	2.9%
Census Tract 8036.13	4,614	20.3%	64.4%	3.3%	20.9%
Census Tract 8037.00	2,396	40.4%	41.2%	0.8%	41.8%
Census Tract 8038.01	1,900	33.2%	53.9%	2.9%	34.8%
Census Tract 8038.03	5,538	19.3%	62.0%	1.6%	28.3%
Census Tract 8039.00	4,083	28.7%	33.2%	1.6%	59.4%
Census Tract 8040.01	4,087	6.5%	88.9%	0.7%	7.4%
Census Tract 8040.02	3,387	41.3%	31.8%	8.2%	45.1%
Census Tract 8041.01	3,206	23.5%	66.3%	0.7%	9.3%
Census Tract 8041.02	6,099	29.7%	64.8%	3.1%	17.4%
Census Tract 8043.00	3,474	19.0%	65.9%	0.0%	33.6%
Census Tract 8044.00	2,680	36.8%	33.0%	6.0%	36.0%
Census Tract 8046.00	2,966	31.4%	39.6%	0.7%	45.1%
Census Tract 8048.00	5,081	4.6%	76.1%	2.3%	19.1%
Census Tract 8049.00	4,687	11.2%	81.1%	0.0%	8.2%
Census Tract 8050.00	4,943	12.5%	53.9%	0.6%	29.8%
Census Tract 8051.01	3,553	25.6%	41.7%	2.4%	46.5%

* This data reflects only the portion of the tract within the Urban County.

Source: 2005-2009 American Community Survey (B01003, B02001, B03001)



	Total Population	Race/Ethnicity			
		White	Black	Asian	Hispanic
Census Tract 8052.01	3,873	17.4%	51.4%	0.9%	39.3%
Census Tract 8052.02	3,930	13.8%	65.9%	0.6%	27.1%
Census Tract 8055.00	4,128	15.7%	42.5%	0.5%	51.8%
Census Tract 8056.01	5,338	20.3%	7.3%	2.3%	88.4%
Census Tract 8056.02	4,271	27.6%	11.0%	0.0%	82.7%
Census Tract 8057.00	5,078	18.0%	32.6%	4.3%	53.8%
Census Tract 8058.01	4,181	13.1%	38.1%	3.4%	56.2%
Census Tract 8058.02	3,364	18.7%	38.4%	1.8%	57.8%
Census Tract 8059.04	2,857	37.3%	35.2%	11.4%	28.6%
Census Tract 8059.05	5,934	26.2%	45.0%	4.5%	41.5%
Census Tract 8060.00	4,163	17.3%	32.1%	8.4%	49.9%
Census Tract 8061.00	4,687	47.6%	29.0%	2.0%	32.0%
Census Tract 8063.00	2,031	49.1%	25.8%	0.5%	45.7%
Census Tract 8065.01	4,523	45.7%	34.6%	1.1%	47.5%
Census Tract 8066.01	4,471	38.1%	36.9%	0.0%	50.3%
Census Tract 8066.02	4,804	29.1%	46.5%	8.0%	35.7%
Census Tract 8067.03	6,570	25.7%	61.9%	4.8%	25.8%
Census Tract 8067.08	4,111	56.6%	20.1%	20.1%	4.2%
Census Tract 8067.10	4,945	26.3%	55.4%	15.3%	3.5%
Census Tract 8067.11	3,746	22.4%	67.4%	4.9%	7.6%
Census Tract 8067.12	2,850	30.5%	53.2%	7.5%	3.1%
Census Tract 8073.01	3,151	42.2%	25.3%	26.9%	4.5%
Census Tract 8073.04	2,119	29.9%	19.1%	4.4%	42.2%
Census Tract 8073.05	3,668	30.0%	39.1%	10.2%	35.1%

* This data reflects only the portion of the tract within the Urban County.

Source: 2005-2009 American Community Survey (B01003, B02001, B03001)



**Figure 12-2
Areas of Racial and Ethnic Concentration in the City of Bowie, 2009**

	Total Population	White	Minority Residents		
			Black	Asian/Pacific Islander	Hispanic
City of Bowie	53,572	48.3%	43.9%	3.4%	5.5%
Census Tract 8004.01	2,633	69.8%	19.6%	2.8%	8.2%
Census Tract 8004.02	4,658	72.7%	16.1%	5.0%	6.4%
Census Tract 8004.03	3,874	55.7%	34.3%	5.2%	9.1%
Census Tract 8004.06*	3,416	41.3%	54.1%	4.1%	10.7%
Census Tract 8004.09*	2,251	46.1%	46.6%	1.4%	8.4%
Census Tract 8005.03*	4,842	58.1%	31.7%	6.7%	5.5%
Census Tract 8005.04*	4,456	74.6%	16.2%	2.3%	4.8%
Census Tract 8005.05	2,789	73.0%	14.7%	3.6%	5.1%
Census Tract 8005.07*	1,060	14.9%	82.0%	0.0%	3.1%
Census Tract 8005.08*	2,937	8.3%	87.8%	3.5%	0.0%
Census Tract 8005.09*	2,020	6.6%	89.1%	0.0%	0.6%
Census Tract 8005.10	7,445	50.8%	45.5%	2.0%	5.5%
Census Tract 8005.11*	4,937	38.5%	55.8%	2.1%	4.9%
Census Tract 8005.12	6,254	26.8%	63.8%	4.4%	3.3%

* The Census Tract is only partially contained within the City of Bowie.

Source: 2005-2009 American Community Survey (B01003, B02001, B03001)



Figure 12-3
Areas of LMI Concentration in the Urban County, FY2011

Census Tract	Low/Moderate Income Persons		
	Universe	#	%
Census Tract 8001.02	2,577	1,380	53.6%
Census Tract 8001.03	1,984	1,154	58.2%
Census Tract 8002.09	4,347	2,647	60.9%
Census Tract 8002.10	2,948	1,845	62.6%
Census Tract 8005.11*	34	34	100.0%
Census Tract 8011.04	6,551	4,107	62.7%
Census Tract 8016	2961	1794	60.6%
Census Tract 8017.02	3471	1812	52.2%
Census Tract 8017.04	4948	3133	63.3%
Census Tract 8017.07	6325	3646	57.6%
Census Tract 8017.08	3746	2044	54.6%
Census Tract 8018.01	2158	1205	55.8%
Census Tract 8018.05	2302	1287	55.9%
Census Tract 8019.02	7385	3970	53.8%
Census Tract 8019.06	1203	654	54.4%
Census Tract 8020.01	5595	3623	64.8%
Census Tract 8021.05	8731	5562	63.7%
Census Tract 8024.03	5876	3559	60.6%
Census Tract 8024.04	4524	3054	67.5%
Census Tract 8024.06	2411	1359	56.4%
Census Tract 8025.01	3634	1947	53.6%
Census Tract 8025.02	2922	1678	57.4%
Census Tract 8026	3245	1862	57.4%
Census Tract 8027	2738	1493	54.5%
Census Tract 8029.01	4226	2449	58.0%
Census Tract 8032	2959	2085	70.5%
Census Tract 8033	4704	2753	58.5%
Census Tract 8034.01	1398	972	69.5%
Census Tract 8034.02	4744	2873	60.6%
Census Tract 8035.08	5050	3349	66.3%
Census Tract 8035.09	3053	2327	76.2%
Census Tract 8035.18	7465	4662	62.5%

Census Tract	Low/Moderate Income Persons		
	Universe	#	%
Census Tract 8035.19	4842	2544	52.5%
Census Tract 8036.02	1937	1108	57.2%
Census Tract 8036.12	3223	2170	67.3%
Census Tract 8036.13	5131	2789	54.4%
Census Tract 8039	3922	2288	58.3%
Census Tract 8040.01	3949	2659	67.3%
Census Tract 8040.02	3808	2102	55.2%
Census Tract 8043	3322	2346	70.6%
Census Tract 8044	2393	1355	56.6%
Census Tract 8046	2862	1599	55.9%
Census Tract 8047	3816	2093	54.8%
Census Tract 8048	5031	3811	75.8%
Census Tract 8049	3558	1998	56.2%
Census Tract 8050	5237	2797	53.4%
Census Tract 8051.01	3389	2241	66.1%
Census Tract 8052.01	3890	2290	58.9%
Census Tract 8052.02	3543	2292	64.7%
Census Tract 8055	4201	2566	61.1%
Census Tract 8056.01	5669	4324	76.3%
Census Tract 8056.02	5055	3921	77.6%
Census Tract 8057	5403	3237	59.9%
Census Tract 8059.01	6160	3894	63.2%
Census Tract 8059.05	6512	4073	62.5%
Census Tract 8060	4083	2176	53.3%
Census Tract 8065.01	4607	2867	62.2%
Census Tract 8066.01	4282	2502	58.4%
Census Tract 8067.03	6443	4271	66.3%
Census Tract 8072	2938	1933	65.8%

* This data reflects only the portion of the tract within the Urban County.

Note: Shaded rows indicate areas of minority concentration.

Source: U.S. Department of HUD, FY2011 LMI Estimates



**Figure 12-4
Areas of LMI Concentration in Bowie, FY2011**

Census Tract	Low/Moderate Income Persons		
	Universe	#	%
Census Tract 8004.01	2089	442	21.16%
Census Tract 8004.06*	2677	614	22.94%
Census Tract 8005.04*	4452	896	20.13%
Census Tract 8005.05	2728	617	22.62%
Census Tract 8005.07*	585	119	20.34%
Census Tract 8005.10	7155	1755	24.53%

* This data reflects only the portion of the tract within the City.

Note: Shaded rows indicate areas of minority concentration.

Source: U.S. Department of HUD, FY2011 LMI Estimates



**Figure 12-5
Trends in Housing Inventory in the Urban County, 2000-2009**

	2000		2009		Change 2000-2009	
	#	% of County Inventory	#	% of County Inventory	#	%
Prince George's County	302,378	---	319,039	---	16,661	5.5%
Urban County**	289,659	95.8%	304,895	95.6%	15,236	5.3%
Census Tract 8001.02	1,416	0.5%	1,428	0.4%	12	0.8%
Census Tract 8001.03	950	0.3%	889	0.3%	-61	-6.4%
Census Tract 8001.05	1,296	0.4%	1,323	0.4%	27	2.1%
Census Tract 8001.06	993	0.3%	988	0.3%	-5	-0.5%
Census Tract 8001.07	3,005	1.0%	2,982	0.9%	-23	-0.8%
Census Tract 8002.02	2,222	0.7%	2,848	0.9%	626	28.2%
Census Tract 8002.03	1,461	0.5%	1,574	0.5%	113	7.7%
Census Tract 8002.06	1,590	0.5%	1,611	0.5%	21	1.3%
Census Tract 8002.07	2,269	0.8%	2,309	0.7%	40	1.8%
Census Tract 8002.08	2,342	0.8%	2,733	0.9%	391	16.7%
Census Tract 8002.09	1,823	0.6%	1,767	0.6%	-56	-3.1%
Census Tract 8002.10	1,340	0.4%	1,271	0.4%	-69	-5.1%
Census Tract 8002.11	1,432	0.5%	1,445	0.5%	13	0.9%
Census Tract 8004.06*	1,905	0.6%	1,944	0.6%	39	2.0%
Census Tract 8004.07	2,947	1.0%	2,958	0.9%	11	0.4%
Census Tract 8004.08	1,348	0.4%	2,116	0.7%	768	57.0%
Census Tract 8004.09*	1,059	0.4%	1,174	0.4%	115	10.9%
Census Tract 8005.03*	560	0.2%	1,270	0.4%	710	126.8%
Census Tract 8005.04*	136	0.0%	120	0.0%	-16	-11.8%
Census Tract 8005.07*	579	0.2%	799	0.3%	220	38.0%
Census Tract 8005.08*	1,481	0.5%	1,571	0.5%	90	6.1%
Census Tract 8005.09*	1,527	0.5%	2,230	0.7%	703	46.0%
Census Tract 8005.11*	26	0.0%	21	0.0%	-5	-19.2%
Census Tract 8006.01	733	0.2%	693	0.2%	-40	-5.5%
Census Tract 8006.03	1,905	0.6%	2,928	0.9%	1,023	53.7%
Census Tract 8006.04	568	0.2%	564	0.2%	-4	-0.7%
Census Tract 8006.05	1,287	0.4%	1,517	0.5%	230	17.9%
Census Tract 8006.06	2,115	0.7%	2,509	0.8%	394	18.6%
Census Tract 8007.01	1,620	0.5%	1,881	0.6%	261	16.1%
Census Tract 8007.02	1,344	0.4%	2,181	0.7%	837	62.3%
Census Tract 8007.03	2,952	1.0%	3,383	1.1%	431	14.6%
Census Tract 8008	1,186	0.4%	1,385	0.4%	199	16.8%
Census Tract 8009	657	0.2%	704	0.2%	47	7.2%
Census Tract 8010.01	1,837	0.6%	2,598	0.8%	761	41.4%
Census Tract 8010.02	2,229	0.7%	2,692	0.8%	463	20.8%
Census Tract 8011.04	2,133	0.7%	1,350	0.4%	-783	-36.7%

* This data reflects only the portion of the tract within the Urban County.

** The Urban County is Prince George's County exclusive of the City of Bowie.

Note: Shaded rows indicate impacted areas of concentration of minorities and LMI persons.

Source: Census 2000 SF3 (H1); 2005-2009 American Community Survey (B25001)



	2000		2009		Change 2000-2009	
	#	% of Total Housing Units	#	% of Total Housing Units	#	%
Census Tract 8012.02	2,285	0.8%	2,369	0.7%	84	3.7%
Census Tract 8012.03	2,330	0.8%	2,620	0.8%	290	12.4%
Census Tract 8012.04	2,409	0.8%	2,485	0.8%	76	3.2%
Census Tract 8012.05	2,243	0.7%	2,360	0.7%	117	5.2%
Census Tract 8012.06	2,502	0.8%	2,761	0.9%	259	10.4%
Census Tract 8012.07	1,467	0.5%	1,531	0.5%	64	4.4%
Census Tract 8013.01	2,822	0.9%	3,886	1.2%	1,064	37.7%
Census Tract 8013.02	934	0.3%	1,060	0.3%	126	13.5%
Census Tract 8013.05	1,636	0.5%	1,848	0.6%	212	13.0%
Census Tract 8013.06	2,149	0.7%	2,343	0.7%	194	9.0%
Census Tract 8013.07	1,220	0.4%	1,405	0.4%	185	15.2%
Census Tract 8013.08	1,163	0.4%	1,227	0.4%	64	5.5%
Census Tract 8013.09	1,249	0.4%	1,279	0.4%	30	2.4%
Census Tract 8014.02	2,676	0.9%	2,710	0.8%	34	1.3%
Census Tract 8014.03	2,153	0.7%	2,392	0.7%	239	11.1%
Census Tract 8014.04	1,916	0.6%	1,946	0.6%	30	1.6%
Census Tract 8014.05	1,595	0.5%	1,582	0.5%	-13	-0.8%
Census Tract 8014.06	1,527	0.5%	1,477	0.5%	-50	-3.3%
Census Tract 8014.07	2,227	0.7%	2,230	0.7%	3	0.1%
Census Tract 8015	961	0.3%	1,135	0.4%	174	18.1%
Census Tract 8016	1,341	0.4%	1,182	0.4%	-159	-11.9%
Census Tract 8017.01	1,766	0.6%	1,735	0.5%	-31	-1.8%
Census Tract 8017.02	1,692	0.6%	1,770	0.6%	78	4.6%
Census Tract 8017.04	2,234	0.7%	2,415	0.8%	181	8.1%
Census Tract 8017.06	696	0.2%	683	0.2%	-13	-1.9%
Census Tract 8017.07	2,365	0.8%	2,360	0.7%	-5	-0.2%
Census Tract 8017.08	1,481	0.5%	1,465	0.5%	-16	-1.1%
Census Tract 8018.01	901	0.3%	890	0.3%	-11	-1.2%
Census Tract 8018.02	1,777	0.6%	1,766	0.6%	-11	-0.6%
Census Tract 8018.04	825	0.3%	786	0.2%	-39	-4.7%
Census Tract 8018.05	1,169	0.4%	1,199	0.4%	30	2.6%
Census Tract 8018.07	2,111	0.7%	2,161	0.7%	50	2.4%
Census Tract 8018.08	1,587	0.5%	1,640	0.5%	53	3.3%
Census Tract 8019.01	1,723	0.6%	1,755	0.6%	32	1.9%
Census Tract 8019.02	3,295	1.1%	3,423	1.1%	128	3.9%
Census Tract 8019.04	1,316	0.4%	1,337	0.4%	21	1.6%
Census Tract 8019.05	1,209	0.4%	1,629	0.5%	420	34.7%
Census Tract 8019.06	950	0.3%	952	0.3%	2	0.2%
Census Tract 8020.01	2,561	0.8%	2,509	0.8%	-52	-2.0%
Census Tract 8020.02	1,760	0.6%	1,674	0.5%	-86	-4.9%
Census Tract 8021.03	1,131	0.4%	1,182	0.4%	51	4.5%
Census Tract 8021.04	1,026	0.3%	957	0.3%	-69	-6.7%
Census Tract 8021.05	3,390	1.1%	3,519	1.1%	129	3.8%
Census Tract 8022.01	967	0.3%	948	0.3%	-19	-2.0%
Census Tract 8022.03	1,761	0.6%	1,780	0.6%	19	1.1%
Census Tract 8022.04	1,930	0.6%	2,234	0.7%	304	15.8%
Census Tract 8023.01	1,303	0.4%	1,331	0.4%	28	2.1%
Census Tract 8024.03	3,125	1.0%	3,100	1.0%	-25	-0.8%
Census Tract 8024.04	1,901	0.6%	1,912	0.6%	11	0.6%
Census Tract 8024.05	1,786	0.6%	1,752	0.5%	-34	-1.9%

* This data reflects only the portion of the tract within the Urban County.

** The Urban County is Prince George's County exclusive of the City of Bowie.

Note: Shaded rows indicate impacted areas of concentration of minorities and LMI persons.

Source: Census 2000 SF3 (H1); 2005-2009 American Community Survey (B25001)



	2000		2009		Change 2000-2009	
	#	% of Total Housing Units	#	% of Total Housing Units	#	%
Census Tract 8024.06	957	0.3%	968	0.3%	11	1.1%
Census Tract 8025.01	1,609	0.5%	1,549	0.5%	-60	-3.7%
Census Tract 8025.02	1,107	0.4%	986	0.3%	-121	-10.9%
Census Tract 8026	1,192	0.4%	1,250	0.4%	58	4.9%
Census Tract 8027	1,082	0.4%	952	0.3%	-130	-12.0%
Census Tract 8028.03	1,886	0.6%	2,059	0.6%	173	9.2%
Census Tract 8028.04	2,256	0.7%	2,202	0.7%	-54	-2.4%
Census Tract 8028.05	1,686	0.6%	1,744	0.5%	58	3.4%
Census Tract 8029.01	1,524	0.5%	1,781	0.6%	257	16.9%
Census Tract 8030.01	1,091	0.4%	1,045	0.3%	-46	-4.2%
Census Tract 8030.02	1,087	0.4%	1,200	0.4%	113	10.4%
Census Tract 8031	1,140	0.4%	1,077	0.3%	-63	-5.5%
Census Tract 8032	1,157	0.4%	1,173	0.4%	16	1.4%
Census Tract 8033	1,630	0.5%	1,646	0.5%	16	1.0%
Census Tract 8034.01	520	0.2%	500	0.2%	-20	-3.8%
Census Tract 8034.02	1,771	0.6%	1,769	0.6%	-2	-0.1%
Census Tract 8035.05	2,445	0.8%	2,482	0.8%	37	1.5%
Census Tract 8035.08	1,729	0.6%	1,668	0.5%	-61	-3.5%
Census Tract 8035.09	1,370	0.5%	967	0.3%	-403	-29.4%
Census Tract 8035.12	1,713	0.6%	2,014	0.6%	301	17.6%
Census Tract 8035.13	2,045	0.7%	2,131	0.7%	86	4.2%
Census Tract 8035.14	1,350	0.4%	1,964	0.6%	614	45.5%
Census Tract 8035.15	2,661	0.9%	2,713	0.9%	52	2.0%
Census Tract 8035.16	1,189	0.4%	1,737	0.5%	548	46.1%
Census Tract 8035.17	2,077	0.7%	2,950	0.9%	873	42.0%
Census Tract 8035.18	2,701	0.9%	2,984	0.9%	283	10.5%
Census Tract 8035.19	1,570	0.5%	1,607	0.5%	37	2.4%
Census Tract 8036.01	1,059	0.4%	1,170	0.4%	111	10.5%
Census Tract 8036.02	790	0.3%	635	0.2%	-155	-19.6%
Census Tract 8036.05	2,095	0.7%	2,221	0.7%	126	6.0%
Census Tract 8036.06	1,609	0.5%	1,611	0.5%	2	0.1%
Census Tract 8036.07	1,020	0.3%	1,055	0.3%	35	3.4%
Census Tract 8036.08	1,893	0.6%	1,829	0.6%	-64	-3.4%
Census Tract 8036.10	1,098	0.4%	1,129	0.4%	31	2.8%
Census Tract 8036.12	1,368	0.5%	1,469	0.5%	101	7.4%
Census Tract 8036.13	2,106	0.7%	2,216	0.7%	110	5.2%
Census Tract 8037	782	0.3%	760	0.2%	-22	-2.8%
Census Tract 8038.01	695	0.2%	736	0.2%	41	5.9%
Census Tract 8038.03	1,908	0.6%	1,892	0.6%	-16	-0.8%
Census Tract 8039	1,135	0.4%	1,053	0.3%	-82	-7.2%
Census Tract 8040.01	2,065	0.7%	2,170	0.7%	105	5.1%

* This data reflects only the portion of the tract within the Urban County.

** The Urban County is Prince George's County exclusive of the City of Bowie.

Note: Shaded rows indicate impacted areas of concentration of minorities and LMI persons.

Source: Census 2000 SF3 (H1); 2005-2009 American Community Survey (B25001)



	2000		2009		Change 2000-2009	
	#	% of Total Housing Units	#	% of Total Housing Units	#	%
Census Tract 8040.02	1,347	0.4%	1,323	0.4%	-24	-1.8%
Census Tract 8041.01	1,190	0.4%	1,314	0.4%	124	10.4%
Census Tract 8041.02	1,925	0.6%	2,205	0.7%	280	14.5%
Census Tract 8042	1,162	0.4%	1,292	0.4%	130	11.2%
Census Tract 8043	1,294	0.4%	1,266	0.4%	-28	-2.2%
Census Tract 8044	914	0.3%	903	0.3%	-11	-1.2%
Census Tract 8046	983	0.3%	921	0.3%	-62	-6.3%
Census Tract 8047	1,392	0.5%	1,588	0.5%	196	14.1%
Census Tract 8048	2,506	0.8%	2,795	0.9%	289	11.5%
Census Tract 8049	1,520	0.5%	1,520	0.5%	0	0.0%
Census Tract 8050	2,315	0.8%	2,155	0.7%	-160	-6.9%
Census Tract 8051.01	1,295	0.4%	1,252	0.4%	-43	-3.3%
Census Tract 8052.01	1,352	0.4%	1,289	0.4%	-63	-4.7%
Census Tract 8052.02	1,278	0.4%	1,288	0.4%	10	0.8%
Census Tract 8055	1,608	0.5%	1,567	0.5%	-41	-2.5%
Census Tract 8056.01	1,598	0.5%	1,399	0.4%	-199	-12.5%
Census Tract 8056.02	1,375	0.5%	1,241	0.4%	-134	-9.7%
Census Tract 8057	1,743	0.6%	1,673	0.5%	-70	-4.0%
Census Tract 8058.01	1,102	0.4%	1,075	0.3%	-27	-2.5%
Census Tract 8058.02	977	0.3%	917	0.3%	-60	-6.1%
Census Tract 8059.01	2,520	0.8%	2,456	0.8%	-64	-2.5%
Census Tract 8059.04	992	0.3%	1,003	0.3%	11	1.1%
Census Tract 8059.05	2,766	0.9%	2,672	0.8%	-94	-3.4%
Census Tract 8060	1,542	0.5%	1,536	0.5%	-6	-0.4%
Census Tract 8061	1,617	0.5%	1,693	0.5%	76	4.7%
Census Tract 8062	1,674	0.6%	1,715	0.5%	41	2.4%
Census Tract 8063	718	0.2%	695	0.2%	-23	-3.2%
Census Tract 8064	1,227	0.4%	1,309	0.4%	82	6.7%
Census Tract 8065.01	1,589	0.5%	1,598	0.5%	9	0.6%
Census Tract 8066.01	1,341	0.4%	1,305	0.4%	-36	-2.7%
Census Tract 8066.02	1,436	0.5%	1,470	0.5%	34	2.4%
Census Tract 8067.03	2,878	1.0%	2,752	0.9%	-126	-4.4%
Census Tract 8067.06	1,573	0.5%	1,618	0.5%	45	2.9%
Census Tract 8067.08	2,240	0.7%	2,239	0.7%	-1	0.0%
Census Tract 8067.10	2,046	0.7%	2,088	0.7%	42	2.1%
Census Tract 8067.11	1,759	0.6%	1,766	0.6%	7	0.4%
Census Tract 8067.12	1,408	0.5%	1,369	0.4%	-39	-2.8%
Census Tract 8068	1,358	0.4%	1,269	0.4%	-89	-6.6%
Census Tract 8069	1,393	0.5%	1,540	0.5%	147	10.6%

* This data reflects only the portion of the tract within the Urban County.

** The Urban County is Prince George's County exclusive of the City of Bowie.

Note: Shaded rows indicate impacted areas of concentration of minorities and LMI persons.

Source: Census 2000 SF3 (H1); 2005-2009 American Community Survey (B25001)



	2000		2009		Change 2000-2009	
	#	% of Total Housing Units	#	% of Total Housing Units	#	%
Census Tract 8070	1,912	0.6%	1,966	0.6%	54	2.8%
Census Tract 8071.02	954	0.3%	901	0.3%	-53	-5.6%
Census Tract 8072	1,069	0.4%	1,258	0.4%	189	17.7%
Census Tract 8073.01	1,495	0.5%	1,418	0.4%	-77	-5.2%
Census Tract 8073.04	596	0.2%	620	0.2%	24	4.0%
Census Tract 8073.05	1,079	0.4%	993	0.3%	-86	-8.0%
Census Tract 8074.04	1,710	0.6%	1,807	0.6%	97	5.7%
Census Tract 8074.05	1,838	0.6%	1,957	0.6%	119	6.5%
Census Tract 8074.06	2,786	0.9%	2,725	0.9%	-61	-2.2%
Census Tract 8074.07	1,909	0.6%	2,196	0.7%	287	15.0%
Census Tract 8074.08	2,374	0.8%	2,439	0.8%	65	2.7%

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Source: Census 2000 SF3 (H1); 2005-2009 American Community Survey (B25001)



Figure 12-6
Trends in Total Housing Inventory in Bowie, 2000-2009

	2000		2009		Change 2000-2009	
	#	% of Total Housing Units	#	% of Total Housing Units	#	%
City of Bowie	18,622	---	20,171	---	1,549	8.3%
Census Tract 8004.01	788	4.2%	901	4.5%	113	14.3%
Census Tract 8004.02	1,926	10.3%	1,939	9.6%	13	0.7%
Census Tract 8004.03	1,021	5.5%	1,296	6.4%	275	26.9%
Census Tract 8004.06*	955	5.1%	1,108	5.5%	153	16.0%
Census Tract 8004.09*	1,012	5.4%	904	4.5%	-108	-10.7%
Census Tract 8005.03*	1,456	7.8%	1,711	8.5%	255	17.5%
Census Tract 8005.04*	1,628	8.7%	1,671	8.3%	43	2.6%
Census Tract 8005.05	954	5.1%	1,017	5.0%	63	6.6%
Census Tract 8005.07*	424	2.3%	574	2.8%	150	35.4%
Census Tract 8005.08*	792	4.3%	996	4.9%	204	25.8%
Census Tract 8005.09*	494	2.7%	565	2.8%	71	14.4%
Census Tract 8005.10	2,988	16.0%	3137	15.6%	149	5.0%
Census Tract 8005.11*	1,979	10.6%	1,940	9.6%	-39	-2.0%
Census Tract 8005.12	2,205	11.8%	2412	12.0%	207	9.4%

* This data reflects only the portion of the tract within the City.

Note: Shaded rows indicate impacted areas of concentration of minorities and LMI persons.

Source: Census 2000 SF3 (H1); 2005-2009 American Community Survey (B25001)



**Figure 12-7
Housing Units in Structures in the Urban County, 2009**

	Total	Single-Family		Multi-Family	
		#	% of total units	#	% of total units
Prince George's County	297,937	203,323	68.2%	93,234	31.3%
Urban County**	278,170	185,642	66.7%	91,524	32.9%
Census Tract 8001.02	1,364	689	50.5%	675	49.5%
Census Tract 8001.03	854	201	23.5%	653	76.5%
Census Tract 8001.05	1,296	1,007	77.7%	289	22.3%
Census Tract 8001.06	975	915	93.8%	60	6.2%
Census Tract 8001.07	2,714	1,411	52.0%	1,303	48.0%
Census Tract 8002.02	2,466	1,578	64.0%	888	36.0%
Census Tract 8002.03	1,530	1,520	99.3%	0	0.0%
Census Tract 8002.06	1,506	882	58.6%	624	41.4%
Census Tract 8002.07	1,976	733	37.1%	1,243	62.9%
Census Tract 8002.08	2,505	1,892	75.5%	585	23.4%
Census Tract 8002.09	1,613	538	33.4%	1,075	66.6%
Census Tract 8002.10	1,107	211	19.1%	896	80.9%
Census Tract 8002.11	1,329	268	20.2%	1,061	79.8%
Census Tract 8004.06*	1,761	1,492	84.7%	395	22.4%
Census Tract 8004.07	2,740	1,364	49.8%	1,376	50.2%
Census Tract 8004.08	2,016	1,993	98.9%	5	0.2%
Census Tract 8004.09*	1,113	1,080	97.0%	94	8.4%
Census Tract 8005.03*	1,150	1,177	102.3%	0	0.0%
Census Tract 8005.04*	106	120	113.2%	0	0.0%
Census Tract 8005.07*	682	600	88.0%	189	27.7%
Census Tract 8005.08*	1,571	1,571	100.0%	0	0.0%
Census Tract 8005.09*	2,133	1,732	81.2%	385	18.0%
Census Tract 8005.11*	21	21	100.0%	0	0.0%
Census Tract 8006.01	656	656	100.0%	0	0.0%
Census Tract 8006.03	2,879	2,769	96.2%	110	3.8%
Census Tract 8006.04	564	533	94.5%	31	5.5%
Census Tract 8006.05	1,461	1,456	99.7%	5	0.3%
Census Tract 8006.06	2,482	1,754	70.7%	728	29.3%
Census Tract 8007.01	1,743	1,734	99.5%	9	0.5%
Census Tract 8007.02	2,133	1,891	88.7%	203	9.5%
Census Tract 8007.03	3,293	3,081	93.6%	212	6.4%
Census Tract 8008	1,344	1,323	98.4%	0	0.0%
Census Tract 8009	622	600	96.5%	5	0.8%
Census Tract 8010.01	2,438	2,215	90.9%	0	0.0%
Census Tract 8010.02	2,616	2,616	100.0%	0	0.0%
Census Tract 8011.04	902	645	71.5%	257	28.5%
Census Tract 8012.02	2,271	2,271	100.0%	0	0.0%
Census Tract 8012.03	2,596	2,500	96.3%	23	0.9%
Census Tract 8012.04	2,357	2,357	100.0%	0	0.0%

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Note: Shaded rows indicate impacted areas of concentration of minorities and LMI persons.

Source: 2005-2009 American Community Survey (B25001)



	Total	Single-Family		Multi-Family	
		#	% of total units	#	% of total units
Census Tract 8012.05	2,347	1,793	76.4%	248	10.6%
Census Tract 8012.06	2,651	2,623	98.9%	28	1.1%
Census Tract 8012.07	1,420	1,412	99.4%	8	0.6%
Census Tract 8013.01	3,675	3,675	100.0%	0	0.0%
Census Tract 8013.02	1,036	1,025	98.9%	0	0.0%
Census Tract 8013.05	1,723	1,723	100.0%	0	0.0%
Census Tract 8013.06	2,147	2,119	98.7%	28	1.3%
Census Tract 8013.07	1,405	1,391	99.0%	14	1.0%
Census Tract 8013.08	1,213	1,213	100.0%	0	0.0%
Census Tract 8013.09	1,230	1,230	100.0%	0	0.0%
Census Tract 8014.02	2,556	1,320	51.6%	1,211	47.4%
Census Tract 8014.03	2,323	2,323	100.0%	0	0.0%
Census Tract 8014.04	1,826	1,142	62.5%	684	37.5%
Census Tract 8014.05	1,555	952	61.2%	603	38.8%
Census Tract 8014.06	1,276	620	48.6%	656	51.4%
Census Tract 8014.07	2,073	1,919	92.6%	154	7.4%
Census Tract 8015	1,033	1,016	98.4%	17	1.6%
Census Tract 8016	1,039	516	49.7%	523	50.3%
Census Tract 8017.01	1,563	800	51.2%	763	48.8%
Census Tract 8017.02	1,604	291	18.1%	1,313	81.9%
Census Tract 8017.04	2,353	854	36.3%	1,499	63.7%
Census Tract 8017.06	621	388	62.5%	223	35.9%
Census Tract 8017.07	1,983	848	42.8%	1,135	57.2%
Census Tract 8017.08	1,389	670	48.2%	719	51.8%
Census Tract 8018.01	886	275	31.0%	611	69.0%
Census Tract 8018.02	1,663	1,386	83.3%	277	16.7%
Census Tract 8018.04	743	743	100.0%	0	0.0%
Census Tract 8018.05	1,121	526	46.9%	595	53.1%
Census Tract 8018.07	2,019	1,049	52.0%	970	48.0%
Census Tract 8018.08	1,495	585	39.1%	910	60.9%
Census Tract 8019.01	1,623	1,599	98.5%	24	1.5%
Census Tract 8019.02	3,275	1,135	34.7%	2,140	65.3%
Census Tract 8019.04	1,197	784	65.5%	413	34.5%
Census Tract 8019.05	1,563	1,381	88.4%	165	10.6%
Census Tract 8019.06	781	482	61.7%	299	38.3%
Census Tract 8020.01	2,250	648	28.8%	1,602	71.2%
Census Tract 8020.02	1,383	1,125	81.3%	238	17.2%
Census Tract 8021.03	1,161	1,062	91.5%	99	8.5%
Census Tract 8021.04	858	274	31.9%	584	68.1%
Census Tract 8021.05	3,291	956	29.0%	2,335	71.0%
Census Tract 8022.01	919	538	58.5%	38	4.1%
Census Tract 8022.03	1,722	1,246	72.4%	476	27.6%
Census Tract 8022.04	2,191	2,168	99.0%	23	1.0%
Census Tract 8023.01	1,244	1,235	99.3%	0	0.0%
Census Tract 8024.03	2,941	825	28.1%	2,116	71.9%
Census Tract 8024.04	1,762	832	47.2%	930	52.8%
Census Tract 8024.05	1,462	663	45.3%	799	54.7%

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Note: Shaded rows indicate impacted areas of concentration of minorities and LMI persons.

Source: 2005-2009 American Community Survey (B25001)

Urban County of Prince George's County and the City of Bowie



	Total	Single-Family		Multi-Family	
		#	% of total units	#	% of total units
Census Tract 8024.06	883	377	42.7%	506	57.3%
Census Tract 8025.01	1,488	508	34.1%	980	65.9%
Census Tract 8025.02	833	833	100.0%	0	0.0%
Census Tract 8026	1,162	850	73.1%	312	26.9%
Census Tract 8027	815	759	93.1%	56	6.9%
Census Tract 8028.03	1,974	1,343	68.0%	631	32.0%
Census Tract 8028.04	2,045	1,394	68.2%	651	31.8%
Census Tract 8028.05	1,665	1,414	84.9%	240	14.4%
Census Tract 8029.01	1,644	1,262	76.8%	382	23.2%
Census Tract 8030.01	986	846	85.8%	140	14.2%
Census Tract 8030.02	1,133	890	78.6%	243	21.4%
Census Tract 8031	904	690	76.3%	208	23.0%
Census Tract 8032	1,111	412	37.1%	699	62.9%
Census Tract 8033	1,516	1,235	81.5%	281	18.5%
Census Tract 8034.01	456	444	97.4%	12	2.6%
Census Tract 8034.02	1,699	1,330	78.3%	369	21.7%
Census Tract 8035.05	2,405	2,336	97.1%	69	2.9%
Census Tract 8035.08	1,556	727	46.7%	829	53.3%
Census Tract 8035.09	894	114	12.8%	780	87.2%
Census Tract 8035.12	1,954	1,120	57.3%	834	42.7%
Census Tract 8035.13	2,068	1,216	58.8%	852	41.2%
Census Tract 8035.14	1,864	913	49.0%	951	51.0%
Census Tract 8035.15	2,593	2,401	92.6%	192	7.4%
Census Tract 8035.16	1,694	1,610	95.0%	84	5.0%
Census Tract 8035.17	2,776	2,503	90.2%	273	9.8%
Census Tract 8035.18	2,404	1,406	58.5%	998	41.5%
Census Tract 8035.19	1,048	893	85.2%	155	14.8%
Census Tract 8036.01	1,137	1,137	100.0%	0	0.0%
Census Tract 8036.02	612	343	56.0%	269	44.0%
Census Tract 8036.05	2,176	2,009	92.3%	167	7.7%
Census Tract 8036.06	1,540	1,540	100.0%	0	0.0%
Census Tract 8036.07	1,023	1,023	100.0%	0	0.0%
Census Tract 8036.08	1,755	1,513	86.2%	242	13.8%
Census Tract 8036.10	1,086	838	77.2%	248	22.8%
Census Tract 8036.12	1,259	307	24.4%	952	75.6%
Census Tract 8036.13	2,150	545	25.3%	1,605	74.7%
Census Tract 8037	750	742	98.9%	8	1.1%
Census Tract 8038.01	637	637	100.0%	0	0.0%
Census Tract 8038.03	1,829	1,185	64.8%	644	35.2%
Census Tract 8039	968	681	70.4%	287	29.6%
Census Tract 8040.01	1,947	147	7.6%	1,800	92.4%
Census Tract 8040.02	1,179	750	63.6%	429	36.4%
Census Tract 8041.01	1,179	765	64.9%	414	35.1%
Census Tract 8041.02	1,926	1,346	69.9%	580	30.1%
Census Tract 8042	1,241	1,241	100.0%	0	0.0%

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Source: 2005-2009 American Community Survey (B25001)

Urban County of Prince George's County and the City of Bowie



	Total	Single-Family		Multi-Family	
		#	% of total units	#	% of total units
Census Tract 8043	1,176	262	22.3%	914	77.7%
Census Tract 8044	807	662	82.0%	145	18.0%
Census Tract 8046	821	700	85.3%	121	14.7%
Census Tract 8047	1,454	1,219	83.8%	235	16.2%
Census Tract 8048	2,675	97	3.6%	2,578	96.4%
Census Tract 8049	1,465	533	36.4%	932	63.6%
Census Tract 8050	1,892	812	42.9%	1,035	54.7%
Census Tract 8051.01	1,200	473	39.4%	727	60.6%
Census Tract 8052.01	1,192	650	54.5%	542	45.5%
Census Tract 8052.02	1,265	385	30.4%	880	69.6%
Census Tract 8055	1,340	549	41.0%	791	59.0%
Census Tract 8056.01	1,321	48	3.6%	1,273	96.4%
Census Tract 8056.02	1,068	123	11.5%	945	88.5%
Census Tract 8057	1,551	783	50.5%	768	49.5%
Census Tract 8058.01	1,011	967	95.6%	19	1.9%
Census Tract 8058.02	845	715	84.6%	130	15.4%
Census Tract 8059.01	2,344	274	11.7%	2,070	88.3%
Census Tract 8059.04	927	794	85.7%	133	14.3%
Census Tract 8059.05	2,295	134	5.8%	2,161	94.2%
Census Tract 8060	1,434	983	68.5%	451	31.5%
Census Tract 8061	1,511	1,182	78.2%	329	21.8%
Census Tract 8062	1,559	808	51.8%	751	48.2%
Census Tract 8063	647	402	62.1%	245	37.9%
Census Tract 8064	1,269	1,133	89.3%	117	9.2%
Census Tract 8065.01	1,469	425	28.9%	1,044	71.1%
Census Tract 8066.01	1,172	721	61.5%	451	38.5%
Census Tract 8066.02	1,336	823	61.6%	513	38.4%
Census Tract 8067.03	2,473	84	3.4%	2,389	96.6%
Census Tract 8067.06	1,509	729	48.3%	780	51.7%
Census Tract 8067.08	2,141	1,128	52.7%	1,013	47.3%
Census Tract 8067.10	1,935	1,155	59.7%	780	40.3%
Census Tract 8067.11	1,563	704	45.0%	859	55.0%
Census Tract 8067.12	1,241	205	16.5%	1,036	83.5%
Census Tract 8068	1,237	1,222	98.8%	15	1.2%
Census Tract 8069	1,410	1,378	97.7%	32	2.3%
Census Tract 8070	1,842	1,347	73.1%	495	26.9%
Census Tract 8071.02	867	770	88.8%	97	11.2%
Census Tract 8072	1,040	332	31.9%	689	66.3%
Census Tract 8073.01	1,340	571	42.6%	769	57.4%
Census Tract 8073.04	620	620	100.0%	0	0.0%
Census Tract 8073.05	959	683	71.2%	276	28.8%
Census Tract 8074.04	1,670	1,306	78.2%	349	20.9%
Census Tract 8074.05	1,862	1,390	74.7%	472	25.3%
Census Tract 8074.06	2,589	676	26.1%	1,913	73.9%
Census Tract 8074.07	2,094	1,424	68.0%	670	32.0%
Census Tract 8074.08	2,292	1,910	83.3%	369	16.1%

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Source: 2005-2009 American Community Survey (B25001)

Urban County of Prince George's County and the City of Bowie



**Figure 12-8
Housing Units in Structures in Bowie, 2009**

	Owner-Occupied				Renter-Occupied				% Renter-Occupied Multi-Family Units**
	Total	Single-Family	Multi-Family	% Multi-Family	Total	Single-Family	Multi-Family	% Multi-Family	
City of Bowie	16,923	16,529	394	2.3%	2,499	1,183	1,316	52.7%	6.8%
Census Tract 8004.01	836	836	0	0.0%	65	65	0	0.0%	0.0%
Census Tract 8004.02	1,749	1,749	0	0.0%	98	98	0	0.0%	0.0%
Census Tract 8004.03	1,277	1,269	8	0.6%	19	19	0	0.0%	0.0%
Census Tract 8004.06*	888	878	10	1.1%	94	94	0	0.0%	0.0%
Census Tract 8004.09*	822	822	0	0.0%	21	21	0	0.0%	0.0%
Census Tract 8005.03*	1,515	1,515	0	0.0%	169	169	0	0.0%	0.0%
Census Tract 8005.04*	1,485	1,470	15	1.0%	172	172	0	0.0%	0.0%
Census Tract 8005.05	947	947	0	0.0%	57	57	0	0.0%	0.0%
Census Tract 8005.07*	167	167	0	0.0%	290	0	290	100.0%	63.5%
Census Tract 8005.08*	940	940	0	0.0%	56	45	11	19.6%	1.1%
Census Tract 8005.09*	565	565	0	0.0%	0	0	0	---	0.0%
Census Tract 8005.10	2,289	2,039	250	10.9%	646	227	419	64.9%	14.3%
Census Tract 8005.11*	1,761	1,745	16	0.9%	179	173	6	3.4%	0.3%
Census Tract 8005.12	1,682	1,587	95	5.6%	633	43	590	93.2%	25.5%

* This data reflects only the portion of the tract within the City.

** As a percent of all occupied units.

Note: Shaded rows indicate impacted areas of concentration of minorities and LMI persons.

Source: 2005-2009 American Community Survey (B25032)



**Figure 12-9
Housing Tenure by Race/Ethnicity in the Urban County, 2009**

	White Owners		Black Owners		Asian Owners		Hispanic Owners	
	# of Owner-Occupied Units	% Owner-Occupied Units	# of Owner-Occupied Units	% Owner-Occupied Units	# of Owner-Occupied Units	% Owner-Occupied Units	# of Owner-Occupied Units	% Owner-Occupied Units
Prince George's County	55,119	75.6%	122,080	62.0%	6,562	65.8%	12,932	55.4%
Urban County**	46,009	73.3%	115,268	61.0%	6,049	64.1%	12,334	54.5%
Census Tract 8001.02	370	47.0%	124	29.7%	19	0	80	79.2%
Census Tract 8001.03	90	21.3%	17	4.9%	11	13.6%	0	0.0%
Census Tract 8001.05	521	95.2%	486	83.9%	63	86.3%	94	90.4%
Census Tract 8001.06	253	82.4%	432	77.7%	37	100.0%	80	87.9%
Census Tract 8001.07	608	53.6%	523	43.3%	17	25.0%	68	26.0%
Census Tract 8002.02	645	70.2%	1,044	80.0%	106	59.9%	79	76.7%
Census Tract 8002.03	1,218	98.2%	106	78.5%	98	100.0%	109	100.0%
Census Tract 8002.06	331	86.2%	430	43.8%	52	67.5%	24	53.3%
Census Tract 8002.07	232	43.4%	340	27.0%	3	3.4%	41	21.1%
Census Tract 8002.08	879	76.0%	835	72.9%	54	75.0%	114	75.5%
Census Tract 8002.09	150	39.9%	116	10.9%	30	69.8%	0	0.0%
Census Tract 8002.10	80	37.7%	62	8.4%	0	0.0%	21	17.6%
Census Tract 8002.11*	116	26.0%	83	10.3%	49	100.0%	0	0.0%
Census Tract 8004.06*	593	58.8%	617	59.4%	136	76.4%	81	58.7%
Census Tract 8004.07	343	92.5%	860	44.7%	44	15.1%	98	74.8%
Census Tract 8004.08	598	100.0%	1,205	97.0%	120	100.0%	68	100.0%
Census Tract 8004.09*	591	63.3%	447	49.6%	42	100.0%	11	36.7%
Census Tract 8005.03*	215	19.5%	851	62.9%	74	50.0%	0	0.0%
Census Tract 8005.04*	107	8.2%	0	0.0%	13	14.9%	0	0.0%
Census Tract 8005.07*	285	100.0%	225	57.4%	0	---	---	---
Census Tract 8005.08*	201	68.8%	1,278	61.3%	15	32.6%	37	100.0%
Census Tract 8005.09*	30	36.6%	1,924	79.5%	27	100.0%	42	100.0%
Census Tract 8005.11*	10	1.3%	11	1.2%	0	0.0%	0	0.0%
Census Tract 8006.01	61	87.1%	542	98.0%	0	---	10	100.0%
Census Tract 8006.03	274	66.3%	2,228	93.0%	21	100.0%	47	100.0%
Census Tract 8006.04	44	100.0%	392	78.2%	19	100.0%	21	100.0%
Census Tract 8006.05	201	88.2%	1,009	84.9%	9	28.1%	0	0.0%
Census Tract 8006.06	234	66.7%	1,574	76.0%	0	---	32	53.3%
Census Tract 8007.01	181	95.3%	1,458	95.2%	21	100.0%	28	75.7%
Census Tract 8007.02	370	87.7%	1,385	87.1%	24	100.0%	15	46.9%
Census Tract 8007.03	705	88.7%	2,145	90.7%	80	100.0%	44	95.7%
Census Tract 8008	932	95.6%	299	100.0%	10	100.0%	27	69.2%
Census Tract 8009	231	68.1%	166	64.8%	0	---	19	100.0%
Census Tract 8010.01	879	92.9%	1,413	98.3%	24	100.0%	40	69.0%
Census Tract 8010.02	368	97.4%	2,074	97.3%	23	100.0%	71	84.5%
Census Tract 8011.04	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Census Tract 8012.02	385	84.6%	1,600	93.0%	19	100.0%	45	58.4%
Census Tract 8012.03	489	100.0%	1,720	88.7%	84	100.0%	32	100.0%
Census Tract 8012.04	438	92.6%	1,542	93.1%	92	100.0%	82	100.0%

* This data reflects only the portion of the tract within the Urban County.

** The Urban County is Prince George's County exclusive of the City of Bowie.

Note: Census tracts in which no member of a racial or ethnic group live (denoted by "-") are differentiated from tracts in which only renters live (denoted by 0.0%).

Note: Shaded rows indicate impacted areas of concentration of minorities and LMI persons.

Source: 2005-2009 American Community Survey (B25003A, B25003B, B25003D, B25003I)



	White Owners		Black Owners		Asian Owners		Hispanic Owners	
	# of Owner-Occupied Units	% Owner-Occupied Units	# of Owner-Occupied Units	% Owner-Occupied Units	# of Owner-Occupied Units	% Owner-Occupied Units	# of Owner-Occupied Units	% Owner-Occupied Units
Census Tract 8012.05	662	90.3%	1,288	85.3%	0	0.0%	72	69.2%
Census Tract 8012.06	362	83.0%	1,991	93.4%	40	100.0%	35	100.0%
Census Tract 8012.07	284	100.0%	936	89.7%	32	100.0%	37	82.2%
Census Tract 8013.01	710	98.2%	2,594	95.2%	142	100.0%	153	95.0%
Census Tract 8013.02	658	91.1%	221	96.5%	19	100.0%	51	100.0%
Census Tract 8013.05	143	86.7%	1,108	85.3%	176	100.0%	81	100.0%
Census Tract 8013.06	240	72.5%	1,381	90.9%	178	75.1%	67	77.9%
Census Tract 8013.07	193	96.0%	948	86.8%	73	98.6%	31	100.0%
Census Tract 8013.08	112	92.6%	854	91.3%	89	100.0%	45	83.3%
Census Tract 8013.09	516	97.4%	590	94.1%	13	100.0%	29	100.0%
Census Tract 8014.02	294	79.0%	1,113	56.3%	56	83.6%	75	55.1%
Census Tract 8014.03	515	97.0%	1,243	89.1%	301	100.0%	202	100.0%
Census Tract 8014.04	364	86.1%	816	67.8%	74	50.0%	57	100.0%
Census Tract 8014.05	223	71.7%	402	43.6%	86	64.2%	220	76.9%
Census Tract 8014.06	37	43.0%	514	45.2%	44	97.8%	17	65.4%
Census Tract 8014.07	143	90.5%	1,504	81.7%	11	100.0%	21	100.0%
Census Tract 8015	165	88.2%	693	94.4%	36	70.6%	43	67.2%
Census Tract 8016	21	100.0%	313	32.2%	0	---	33	71.7%
Census Tract 8017.01	126	85.1%	731	53.4%	15	100.0%	38	77.6%
Census Tract 8017.02	123	71.9%	163	11.9%	0	0.0%	29	100.0%
Census Tract 8017.04	40	78.4%	640	28.9%	33	100.0%	40	51.3%
Census Tract 8017.06	18	51.4%	326	56.6%	0	---	0	0.0%
Census Tract 8017.07	62	100.0%	625	33.8%	41	65.1%	10	40.0%
Census Tract 8017.08	108	64.7%	451	37.3%	0	---	17	28.3%
Census Tract 8018.01	40	51.9%	137	17.1%	9	100.0%	0	0.0%
Census Tract 8018.02	21	37.5%	962	59.9%	0	---	0	0.0%
Census Tract 8018.04	42	59.2%	612	92.4%	0	---	8	100.0%
Census Tract 8018.05	27	27.0%	482	47.2%	0	---	34	100.0%
Census Tract 8018.07	33	22.8%	891	50.3%	0	---	0	0.0%
Census Tract 8018.08	27	25.5%	524	39.1%	0	---	0	0.0%
Census Tract 8019.01	279	100.0%	1,153	92.1%	42	100.0%	18	100.0%
Census Tract 8019.02	111	58.4%	945	31.7%	0	---	0	0.0%
Census Tract 8019.04	181	73.9%	482	56.0%	0	---	42	42.0%
Census Tract 8019.05	204	68.7%	956	79.9%	0	---	40	100.0%
Census Tract 8019.06	200	98.0%	208	37.7%	4	100.0%	24	70.6%
Census Tract 8020.01	134	56.5%	390	20.2%	0	0.0%	28	23.7%
Census Tract 8020.02	24	77.4%	932	69.7%	0	---	9	56.3%
Census Tract 8021.03	127	90.1%	873	88.2%	0	---	26	100.0%
Census Tract 8021.04	57	100.0%	401	52.0%	10	100.0%	23	100.0%
Census Tract 8021.05	16	39.0%	936	29.0%	0	---	0	0.0%
Census Tract 8022.01	188	100.0%	648	96.3%	29	100.0%	0	0.0%
Census Tract 8022.03	102	73.9%	960	65.0%	12	100.0%	39	62.9%
Census Tract 8022.04	218	100.0%	1,821	96.6%	47	100.0%	31	100.0%
Census Tract 8023.01	114	90.5%	925	85.8%	0	---	12	100.0%
Census Tract 8024.03	55	23.4%	723	27.1%	0	---	0	0.0%

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Note: Census tracts in which no member of a racial or ethnic group live (denoted by "--") are differentiated from tracts in which only renters live (denoted by 0.0%).

Note: Shaded rows indicate impacted areas of concentration of minorities and LMI persons.

Source: 2005-2009 American Community Survey (B25003A, B25003B, B25003D, B25003I)

Urban County of Prince George's County and the City of Bowie



	White Owners		Black Owners		Asian Owners		Hispanic Owners	
	# of Owner-Occupied Units	% Owner-Occupied Units	# of Owner-Occupied Units	% Owner-Occupied Units	# of Owner-Occupied Units	% Owner-Occupied Units	# of Owner-Occupied Units	% Owner-Occupied Units
Census Tract 8024.04	6	13.3%	591	35.0%	0	---	6	37.5%
Census Tract 8024.05	19	38.8%	517	39.2%	10	100.0%	32	100.0%
Census Tract 8024.06	66	64.7%	249	32.9%	0	---	7	22.6%
Census Tract 8025.01	79	79.8%	438	32.2%	0	---	38	100.0%
Census Tract 8025.02	64	100.0%	662	88.3%	0	---	52	100.0%
Census Tract 8026	0	---	739	66.5%	0	---	31	100.0%
Census Tract 8027	84	65.6%	547	80.8%	10	100.0%	22	100.0%
Census Tract 8028.03	56	100.0%	1,032	57.1%	37	100.0%	32	100.0%
Census Tract 8028.04	40	67.8%	1,219	62.2%	0	0.0%	0	0.0%
Census Tract 8028.05	26	41.3%	1,166	73.3%	0	---	15	55.6%
Census Tract 8029.01	29	100.0%	858	57.5%	0	---	50	100.0%
Census Tract 8030.01	59	100.0%	613	71.4%	7	43.8%	68	100.0%
Census Tract 8030.02	0	0.0%	818	72.6%	0	---	10	100.0%
Census Tract 8031	81	100.0%	470	59.1%	0	---	63	64.3%
Census Tract 8032	10	43.5%	268	25.4%	0	---	8	16.3%
Census Tract 8033	56	100.0%	984	68.4%	21	100.0%	32	100.0%
Census Tract 8034.01	16	100.0%	268	68.0%	0	---	38	100.0%
Census Tract 8034.02	11	27.5%	1,031	64.8%	0	---	25	56.8%
Census Tract 8035.05	126	100.0%	1,907	87.6%	33	100.0%	23	100.0%
Census Tract 8035.08	54	62.8%	579	40.8%	0	0.0%	54	54.0%
Census Tract 8035.09	0	0.0%	104	12.5%	0	---	0	0.0%
Census Tract 8035.12	18	23.4%	1,088	60.3%	9	19.1%	15	57.7%
Census Tract 8035.13	103	88.8%	1,369	72.7%	12	100.0%	45	57.7%
Census Tract 8035.14	0	0.0%	1,096	63.6%	0	0.0%	9	100.0%
Census Tract 8035.15	38	73.1%	2,141	89.4%	62	66.7%	0	0.0%
Census Tract 8035.16	190	93.1%	1,228	89.6%	61	100.0%	36	72.0%
Census Tract 8035.17	123	28.9%	2,112	96.7%	124	100.0%	0	0.0%
Census Tract 8035.18	0	0.0%	1,003	46.4%	33	30.0%	53	100.0%
Census Tract 8035.19	14	22.2%	582	61.3%	0	0.0%	18	54.5%
Census Tract 8036.01	74	100.0%	978	95.0%	34	100.0%	23	100.0%
Census Tract 8036.02	0	---	295	48.2%	0	---	0	0.0%
Census Tract 8036.05	843	92.1%	816	75.8%	77	100.0%	364	100.0%
Census Tract 8036.06	460	81.1%	554	88.1%	157	94.6%	196	70.3%
Census Tract 8036.07	249	96.1%	614	94.2%	19	100.0%	90	100.0%
Census Tract 8036.08	214	60.5%	1,061	88.4%	51	58.6%	92	50.5%
Census Tract 8036.10	346	83.8%	402	67.0%	43	100.0%	125	60.4%
Census Tract 8036.12	110	93.2%	208	20.0%	30	58.8%	34	100.0%
Census Tract 8036.13	176	54.5%	526	32.8%	11	15.5%	92	37.2%
Census Tract 8037	252	91.0%	317	83.2%	4	100.0%	190	92.7%
Census Tract 8038.01	189	87.5%	301	88.8%	0	0.0%	136	78.6%
Census Tract 8038.03	236	73.8%	590	46.0%	20	83.3%	259	76.2%
Census Tract 8039	210	81.1%	251	59.3%	12	54.5%	272	64.6%
Census Tract 8040.01	26	22.4%	114	6.6%	17	56.7%	32	27.1%
Census Tract 8040.02	310	68.1%	96	20.0%	72	100.0%	218	59.2%
Census Tract 8041.01	239	83.9%	403	51.6%	0	0.0%	104	100.0%
Census Tract 8041.02	382	75.3%	740	56.0%	46	100.0%	108	54.3%
Census Tract 8042	736	97.5%	357	92.0%	19	100.0%	41	100.0%
Census Tract 8043	10	6.1%	229	26.2%	0	---	65	22.9%
Census Tract 8044	244	89.4%	210	55.0%	33	94.3%	157	83.1%

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Note: Census tracts in which no member of a racial or ethnic group live (denoted by "--") are differentiated from tracts in which only renters live (denoted by 0.0%).

Note: Shaded rows indicate impacted areas of concentration of minorities and LMI persons.

Source: 2005-2009 American Community Survey (B25003A, B25003B, B25003D, B25003I)

Urban County of Prince George's County and the City of Bowie



	White Owners		Black Owners		Asian Owners		Hispanic Owners	
	# of Owner-Occupied Units	% Owner-Occupied Units	# of Owner-Occupied Units	% Owner-Occupied Units	# of Owner-Occupied Units	% Owner-Occupied Units	# of Owner-Occupied Units	% Owner-Occupied Units
Census Tract 8046	191	72.1%	283	71.1%	9	100.0%	184	74.2%
Census Tract 8047	498	80.3%	405	70.9%	34	58.6%	181	82.6%
Census Tract 8048	0	0.0%	97	4.6%	0	0.0%	0	0.0%
Census Tract 8049	61	43.6%	343	27.7%	0	---	58	67.4%
Census Tract 8050	131	69.3%	655	51.1%	8	100.0%	173	89.2%
Census Tract 8051.01	125	49.6%	121	21.1%	16	41.0%	140	29.8%
Census Tract 8052.01	83	72.8%	431	51.2%	10	100.0%	115	46.0%
Census Tract 8052.02	83	55.7%	159	17.0%	0	0.0%	64	35.2%
Census Tract 8055	200	80.0%	214	28.9%	11	100.0%	108	26.9%
Census Tract 8056.01	13	4.9%	7	3.7%	7	29.2%	16	1.5%
Census Tract 8056.02	10	3.3%	54	34.2%	0	---	87	10.4%
Census Tract 8057	183	59.0%	293	44.9%	46	79.3%	413	68.2%
Census Tract 8058.01	128	91.4%	405	89.2%	28	100.0%	382	86.2%
Census Tract 8058.02	147	71.4%	306	87.9%	12	100.0%	250	61.4%
Census Tract 8059.01	188	35.5%	74	6.0%	45	18.7%	16	3.2%
Census Tract 8059.04	294	73.9%	236	77.6%	75	58.1%	135	66.8%
Census Tract 8059.05	220	48.8%	491	37.5%	21	19.8%	132	21.2%
Census Tract 8060	314	82.8%	252	41.8%	39	48.1%	370	78.2%
Census Tract 8061	682	83.4%	220	47.4%	37	100.0%	277	97.2%
Census Tract 8062	488	58.5%	300	47.9%	0	0.0%	110	52.6%
Census Tract 8063	192	60.0%	89	43.8%	0	---	53	26.4%
Census Tract 8064	922	86.8%	94	100.0%	87	100.0%	61	66.3%
Census Tract 8065.01	350	52.1%	19	3.1%	0	0.0%	90	18.8%
Census Tract 8066.01	260	54.6%	326	64.2%	0	---	160	36.3%
Census Tract 8066.02	271	67.4%	357	52.0%	85	100.0%	231	68.8%
Census Tract 8067.03	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Census Tract 8067.06	539	70.2%	445	74.4%	45	56.3%	68	100.0%
Census Tract 8067.08	904	66.5%	103	21.4%	67	23.0%	39	72.2%
Census Tract 8067.10	554	98.1%	802	76.7%	259	97.4%	41	78.8%
Census Tract 8067.11	305	78.0%	506	48.8%	69	86.3%	59	67.0%
Census Tract 8067.12	332	79.4%	350	50.8%	9	14.1%	25	100.0%
Census Tract 8068	813	87.5%	87	65.4%	86	92.5%	121	93.1%
Census Tract 8069	894	90.8%	84	54.5%	64	46.0%	162	69.5%
Census Tract 8070	756	61.4%	139	43.2%	50	32.5%	163	86.2%
Census Tract 8071.02	538	81.8%	119	84.4%	36	100.0%	72	91.1%
Census Tract 8072	189	24.1%	4	2.7%	28	40.0%	23	100.0%
Census Tract 8073.01	235	33.6%	199	71.6%	46	14.6%	0	0.0%
Census Tract 8073.04	272	100.0%	141	100.0%	15	50.0%	63	50.4%
Census Tract 8073.05	212	68.4%	221	61.7%	99	90.0%	111	41.3%
Census Tract 8074.04	606	67.9%	275	54.7%	78	60.5%	151	100.0%
Census Tract 8074.05	1,080	85.2%	257	78.8%	97	65.1%	244	91.7%
Census Tract 8074.06	402	59.6%	698	50.8%	56	24.9%	177	38.9%
Census Tract 8074.07	559	76.1%	509	53.3%	209	83.3%	224	85.2%
Census Tract 8074.08	1,534	90.8%	388	97.2%	54	31.6%	108	87.8%

* Census tracts are partially contained within the Urban County

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Note: Census tracts in which no member of a racial or ethnic group live (denoted by "--") are differentiated from tracts in which only renters live (denoted by 0.0%).

Note: Shaded rows indicate impacted areas of concentration of minorities and LMI persons.

Source: 2005-2009 American Community Survey (B25003A, B25003B, B25003D, B25003I)

Urban County of Prince George's County and the City of Bowie



**Figure 12-10
Housing Tenure by Race/Ethnicity in Bowie, 2009**

	White Owners		Black Owners		Asian Owners		Hispanic Owners	
	# of Owner-Occupied Units	% Owner-Occupied Units	# of Owner-Occupied Units	% Owner-Occupied Units	# of Owner-Occupied Units	% Owner-Occupied Units	# of Owner-Occupied Units	% Owner-Occupied Units
City of Bowie	9,110	89.6%	6,812	84.3%	513	94.8%	598	82.0%
Census Tract 8004.01	665	96.8%	111	72.1%	29	100.0%	43	100.0%
Census Tract 8004.02	1,377	96.8%	248	85.8%	50	100.0%	44	80.0%
Census Tract 8004.03	797	97.7%	354	100.0%	63	100.0%	119	100.0%
Census Tract 8004.06*	415	93.0%	421	87.0%	42	100.0%	57	100.0%
Census Tract 8004.09*	343	96.6%	454	100.0%	---	---	19	67.9%
Census Tract 8005.03*	889	87.2%	503	98.1%	74	72.5%	52	64.2%
Census Tract 8005.04*	1,196	90.0%	185	82.6%	74	100.0%	45	100.0%
Census Tract 8005.05	846	99.2%	46	47.9%	14	100.0%	29	100.0%
Census Tract 8005.07*	0	0.0%	167	43.4%	---	---	---	---
Census Tract 8005.08*	91	89.2%	808	94.7%	31	100.0%	---	---
Census Tract 8005.09*	52	100.0%	496	100.0%	---	---	---	---
Census Tract 8005.10	1,203	80.7%	1,027	76.2%	43	100.0%	100	78.7%
Census Tract 8005.11*	780	88.7%	911	91.9%	34	100.0%	52	59.1%
Census Tract 8005.12	456	71.3%	1,081	75.2%	59	100.0%	38	66.7%

* This data reflects only the portion of the tract within the City.

** The Urban County is Prince George's County exclusive of the City of Bowie.

Note: Census tracts in which no member of a racial or ethnic group live (denoted by "--") are differentiated from tracts in which only renters live (denoted by 0.0%).

Note: Shaded rows indicate impacted areas of concentration of minorities and LMI persons.

Source: 2005-2009 American Community Survey (B25003A, B25003B, B25003D, B25003I)



13. Appendix C: Glossary of Terms and Acronyms

AAP:	Annual Action Plan
ACOP:	The Admissions and Continued Occupancy Plan of a public housing authority
ACS:	American Community Survey
ADA:	The Americans with Disabilities Act
Affordable Housing:	Generally defined as housing in which the occupant is paying no more than 30% of gross income for gross housing costs, including utility costs
AI:	Analysis of Impediments to Fair Housing Choice
Area of Racial/ Ethnic Concentration:	In Prince George’s County, a census tract or block group where the percentage of a specific minority group (racial or ethnic) is double the regional percentage for that group. In Bowie, tracts where the percentage of a specific racial or ethnic group is 10 percentage points higher than the City overall.
CAPER:	Consolidated Annual Performance and Evaluation Report
CDBG:	Community Development Block Grant Program administered by the U.S. Department of Housing and Urban Development.
Concentration of Low and Moderate Income (LMI) Populations:	A census tract or block group where 51% or more of the residents have an income at or below 80% of the area median family income
Cost Burden:	The extent to which gross housing costs, including utility costs, exceed 30% of gross income, based on data published by the U.S. Census Bureau
Con Plan:	The Five-Year Consolidated Plan
DHCD:	Department of Housing and Community Development
Dissimilarity Index:	The distribution of racial or ethnic groups across a geographic area, which allows for comparisons between subpopulations indicating how much one group is spatially separated from another group within a community
FMR:	Fair market rent, as determined by HUD
HAPGC:	Housing Authority of Prince George’s County



HCV:	The Section 8 Housing Choice Voucher Program administered by the U.S. Department of Housing and Urban Development
HMDA:	The Home Mortgage Disclosure Act
HOME:	The HOME Investment Partnership Program authorized by Title II of the National Affordable Housing Act
HRC:	Human Relations Commission
Household:	One or more persons occupying a housing unit (U.S. Census definition)
Housing Problems:	HUD defines housing problems as (1) cost of 30% or more (i.e., paying more than 30% of gross income on gross monthly housing expenses), (2) lacking complete kitchen or plumbing facilities, and/or (3) overcrowding of more than 1.01 persons per room
Housing Unit:	An occupied or vacant house, apartment, or single room that is intended as separate living quarters (U.S. Census definition)
Impacted Area:	A census tract or block group in which there is a concentration of both minority persons and lower income persons, both of which are defined by the local jurisdiction
LAP:	Language Access Plan
LEP:	Limited English proficiency
LIHTC:	Low-Income Housing Tax Credit Program
Low-income:	Households whose incomes do not exceed 80% of the area median family income as determined by HUD with adjustments for smaller and larger families
Moderate-income:	Households whose incomes are between 50% and 80% of the area median family income as determined by HUD with adjustments for smaller and larger families
NSP:	Neighborhood Stabilization Program administered by the U.S. Department of Housing and Urban Development
Overcrowded:	A housing unit containing more than one person per habitable room (HUD definition)
Owner:	A household that owns the housing unit it occupies (U.S. Census definition)
PHA:	Public housing authority
Physical Defects:	A housing unit lacking complete kitchen or bathroom facilities (U.S. Census definition)
Poverty Level:	Households with incomes below the poverty line as defined by the Office of Management and Budget and revised annually



Renter:	A household that rents the housing unit it occupies, including both units rented for cash and units occupied without cash payment for rent (U.S. Census definition).
Renter-Occupied Unit:	Any occupied housing unit that is not owner-occupied, including units rented for cash and units occupied without cash payment for rent.
Tenant-Based Rental Assistance:	A form of rental assistance in which the assisted tenant may move from a dwelling unit with a right to continued assistance. The assistance is provided for the tenant, not for the unit or project.
Total Vacant Housing Units:	Unoccupied year-round housing units (U.S. Census definition).
UFAS:	Uniform Federal Accessibility Standards.
Vacant Housing Unit:	Unoccupied year-round housing units that are available or intended for occupancy at any time during the year (U.S. Census definition).
Very Low Income:	Households whose incomes do not exceed 50% of the area median family income as determined by HUD with adjustments for smaller and larger families.

