City of Philadelphia and the Philadelphia Housing Authority

Assessment of Fair Housing

December 23, 2016

Table of Contents

I. Cover Sheet

II. Executive Summary 1

III. Community Participation Process 5

IV. Assessment of Past Goals and Actions 29

V. Fair Housing Analysis 45

A. Demographic Summary 46

B. General Issues 86

i Segregation/Integration 87

ii. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) 112

iii. Disparities in Access to Opportunity 125

a. Educational Opportunities 141

b. Employment Opportunities 153

c. Transportation Opportunities 162

d. Low Poverty Exposure Opportunities 180

e. Environmentally Healthy Neighborhood Opportunities 186

f. Patterns in Disparities in Access to Opportunity 198

iv. Disproportionate Housing Needs 202

C. Publicly Supported Housing Analysis 228

D. Disability and Access Analysis 270

E. Fair Housing Enforcement, Outreach Capacity and Resources Analysis 302

VI. Fair Housing Goals and Priorities 316

Acknowledgements 331

VII. Appendices

Appendix A : HUD Provided Maps A-1

Appendix B: HUD Provided Tables B-1

Appendix C: Descriptions of Potential Contributing Factors C-1

Appendix D: Affirmative Action and EEO D-1

Appendix E: Outreach Materials E-1

Tables

Table 1: Focus Group Summary 12

Table 2: Stakeholder Meeting Summary 13

Table 3: Jobs Created, Jobs Retained FY13-FY16 31

Table 4: Demographic Distributions for Adaptive Modifications Program 32

Table 5: Housing Production FY13-FY16 34

Table 6: Demographic Distributions for Basic Systems Repair Program 37

Table 7: Projected Population Trends in Philadelphia and Region, 2015 - 2045 52

Table 8: Demographic Trends 1990 - 2010 54

able 9: Asian Populations in Philadelphia, 2010-2014 56

Table 10: Hispanic/Latino Populations in Philadelphia, 2010-2014 56

Table 11: Population by National Origin in Philadelphia and Region, 1990 - 2010 61

Table 12: Top 10 Countries of Origin for Foreign Born (FB) Population, Philadelphia, 1970 & 2010 62

Table 13: Limited English Proficiency Language in Philadelphia and Region 63

Table 14: Limited English Proficiency Households by Language, Philadelphia 2010-2014 63

Table 15: Educational Attainment of Population by Metropolitan County 2014 67

Table 16: Unemployment Rates 68

Table 17: Population Living in Poverty 70

Table 18: Age in Philadelphia and Region, 1990 - 2010 74

Table 19: Philadelphia Population by Age, 2000 and 2014 74

Table 20: Philadelphia Population with Disability by Type 78

Table 21: Population with Disability by Age and Sex, Philadelphia 2010-2014 79

Table 22: Veterans with Disability by Age in Philadelphia, 2010-2014 79

Table 23: Homeownership Rates in Philadelphia by Race/Ethnicity 85

Table 24: Dissimilarity Index 87

Table 25: Racial/Ethnic Dissimilarity Trends 87

Table 26: R/ECAP Population by Race/Ethnicity in Philadelphia and Region 115

Table 27: R/ECAP Population by National Origin in Philadelphia and Region 120

Table 28: R/ECAP Population by Family Type in Philadelphia and Region 122

Table 29: School Proficiency Index 142

Table 30: Labor Market Index 154

Table 31: Jobs Proximity Index 157

Table 32: Transit Index by Race/Ethnicity for Philadelphia and the Region 169

Table 33: Low Transportation Cost Index by Race/Ethnicity for Philadelphia and the Region 170

Table 34: Low Poverty Opportunity Indicator by Race/Ethnicity (Jurisdiction) 181

Table 35: Low Poverty Opportunity Indicator by Race/Ethnicity (Region) 182

Table 36: Environmental Health Index 187

Table 37: Total Number of Children Tested for Lead in Philadelphia with Elevated Blood Lead Levels, 2012 - 2014 191

Table 38: Asthma Hospitalization Age-adjusted Discharge Rates of Children Under 18, Medicaid Only, by Zip Code 192

Table 39: Households Experiencing Housing Problems by Race/Ethnicity 205

Table 40: Households Experiencing Severe Housing Problems by Race/Ethnicity 206

Table 41: Households Experiencing Severe Housing Cost Burden by Race/Ethnicity 207

Table 42: Households Experiencing Housing Problems by Household Type and Size 208

Table 43: Households with Severe Housing Cost Burden by Household Type and Size 209

Table 44: Publicly Supported Housing by Program Category: Units by Number of Bedrooms 216

Table 45: Owner and Renter Occupancy Rates by Race/Ethnicity in Philadelphia and the Region, 2014 217

Table 46: Homeowners and Renters with Housing Cost Burden by Age, 2014 218

Table 47: Households in Publicly Supported Housing by Race/Ethnicity1 230

Table 48: Race/Ethnicity Data 236

Table 49: Gender 237

Table 50: Disability Status 238

Table 51: Family Status 238

Table 52: Occupied Units in R/ECAP and non-R/ECAP Tracts 239

Table 53: Number of Units Citywide in Both R/ECAP and Non-R/ECAP Areas Relative to Vouchers in Use in 2011 and 2015 240

Table 54: Black Population - Rental and Voucher Units Citywide Relative to Vouchers in Use in 2011 and 2015 241

Table 55: Hispanic Population - Rental and Voucher Units Citywide Relative to Vouchers in Use in 2011 and 2015 241

Table 56: Local Real Estate Markets - Rental and Voucher Units Citywide Relative to Vouchers in Use in 2011 and 2015 242

Table 57: Portability of Vouchers to and From Philadelphia 2012 to Mid-Year 2016 242

Table 58: Families with Children in R/ECAP and Non-R/ECAP Tracts by Publicly Supported Housing Category 244

Table 59: Elderly Households in R/ECAP and Non-R/ECAP Tracts by Publicly Supported Housing Category 245

Table 60: Disabled Households in R/ECAP and Non-R/ECAP Tracts by Publicly Supported Housing Category 246

Table 61: Race/Ethnicity Demographics 248

Table 62: Other Protected Classes Demographics 250

Table 63: Public Housing Households by Race/Ethnicity 251

Table 64: Percent of Public Housing Households by Race/Ethnicity by Development 251

Table 65: Public Housing Residents Ages 65+ 252

Table 66: Gender of Public Housing Residents 252

Table 67: Percent of Public Housing Male Headed Households by Development 252

Table 68: Disability Status of Public Housing Households 253

Table 69: Public Housing Percent of Disability Status by Development 253

Table 70: Public Housing Families with Children 253

Table 71: Public Housing Percent of Families with Children by Development 254

Table 72: Public Housing Developments Proposed for RAD Conversion 256

Table 73: Race/Ethnicity of Public Housing Properties Proposed for RAD Conversion ...256

Table 74: Residents Ages 65+/Head of Household Disabled Status of Public Housing Properties Proposed for RAD Conversion 257

Table 75: Gender of Residents of Public Housing Properties Proposed for RAD Conversion 257

Table 76: Race of LIHTC Households Reporting Race/Ethnicity 258

Table 77: LIHTC Households by Race/Ethnicity 258

Table 78: Percent of Disabled LIHTC Households 259

Table 79: LIHTC Residents Ages 65+.....259

Table 80: Developments Ready for Construction 266

Table 81: Developments Expected to Close 2017 266

Table 82: Disability Type in Philadelphia and Region.....272

Table 83: Disability by Age Group 272

Table 84: Accessible Housing Units by Jurisdiction 276

Table 85: Point-in-Time Subpopulations Summary for PA-500 - Philadelphia CoC: Chronically Homeless Subpopulations.....290

Table 86: Point-in-Time Subpopulations Summary for PA-500 - Philadelphia CoC: Persons in Households With At Least One Adult and One Child 290

Table 87: Point-in-Time Subpopulations Summary for PA-500 - Philadelphia CoC: Persons in Households With Only Children 291

Table 88: Point-in-Time Subpopulations Summary for PA-500 - Philadelphia CoC: Persons in Households Without Children..... 292

Table 89: Point-in-Time Subpopulations Summary for PA-500 - Philadelphia CoC: Total Households and Persons 293

Table 90: Housing Complaints Filed By Basis 304

Table 91: Housing Complaints Closed By Resolution Type 305

Table 92: Community Relations Statistics 306

Table 93: Fair Housing Commission Statistics 306

Table 94: Pennsylvania Human Relations Commission - Docketed Cases By Type for Philadelphia County* 307

Table 95: Filed Cases by Basis - Philadelphia, Pennsylvania June 30, 2012 to June 30, 2016 308

Table 96: Philadelphia Cases Completed June 30, 2012 to June 30, 2016, by Resolution Type 309

Table 97: Fair Housing Complaints Received Between 2013-2015 in the City of Philadelphia by the Housing Equality Center of PA 313

Table 98: Fair Housing Rights Center in Southeastern Pennsylvania Testing Data Report for Philadelphia County 2011-2016 315

Table 99: Fair Housing Rights Center In Southeastern Pennsylvania 2011-2016 Complaint Resolution Report 316

Charts

Chart 1: Population Trends in Philadelphia, 1970 - 2014 50

Chart 2: Population Trends in Philadelphia and Region, 1990 - 2014 51

Chart 3: Philadelphia Population by Race, 1970 - 2014 55

Chart 4: Unemployment by Race/Ethnicity 68

Chart 5: Working Age Population Not in Labor Force by Race and Sex 69

Chart 6: Poverty Rates by Race and Ethnicity 70

Chart 7: Poverty Rate by Living Arrangement 71

Chart 8: Poverty Rate by Disability Status 71

Chart 9: Population At, Above and Below Poverty Level 72

Chart 10: Families with Children in Philadelphia and Region, 1990 - 2010 73

Chart 11: Philadelphia Population by Age, 2014 75

Chart 12: Homeownership and Rental Rate Comparison, Philadelphia 1990 - 2014 85

Chart 13: Racial and Ethnic Composition of Northeast Philadelphia 1990-2010 101

Chart 14: Unemployment Rate by Race and Ethnicity 160

Chart 15: Household Vehicles Available by Area 176

Chart 16: Inventory of HUD Elderly and Special Need Units by Project Expiration.....204

Chart 17: LIHTC Units by Compliance Period.....204

Chart 18: Publicly Supported Housing Race/Ethnicity 231

Chart 19: Publicly Supported Housing - All Black Households 233

Chart 20: Publicly Supported Housing - All White Households.....233

Chart 21: Publicly Supported Housing - All Hispanic Households.....234

Chart 22: Publicly Supported Housing - All Asian or Pacific Islander Households 234

Chart 23: Families with Children in Publicly Supported Housing -

\ Percent in R/ECAP and non-R/ECAP Tracts.....243

Chart 24: All Elderly Households in Publicly Supported Housing
by R/ECAP and Non-R/ECAP Tracts 244

Chart 25: Disabled Households in R/ECAP and Non-R/ECAP Tracts 245

Chart 26: Race/Ethnicity R/ECAP Tracts - All Publicly Supported Housing 247

Chart 27: Race/Ethnicity Non-R/ECAP Tracts - All Publicly Supported Housing.....248

Chart 28: Complaints Filed June 30 2012-June 30 2016 308

Maps

Neighborhood Advisory Committees with R/ECAP Overlay 11

Place-Based Strategies..... 39

Reinvestment Fund's 2008 Market Value Analysis (MVA) of Philadelphia 48

Reinvestment Fund's 2015 Market Value Analysis (MVA) of Philadelphia 49

Projected Population Trends in Philadelphia and Region, 2015 - 2045 53

Estimated perccent of All People Who Were White Between 2010-2014..... 57

Concentrations of African-Americans in Philadelphia, 2014 58

Concentrations of Asian Populations in Philadelphia, 2014 59

Concentrations of Hispanic Populations in Philadelphia, 2014 60

Limited English Proficiency in City of Philadelphia 64

Limited English Proficiency Philadelphia Region 65

Limited English Proficiency 66

Philadelphia Change in Population Aged 18 to 34 between 2000 and 2014 76

Homeownership Rate, Philadelphia 2014 81

Homeownership Rate Percentage Change, Philadelphia 2000 - 2014 82

Rental Rate, Philadelphia 2014 83

Rental Rate Change, Philadelphia 2000 - 2014 84

Race/ Ethnicity 88

Probability That Two Individuals Chosen At Random Would be Different Races or Ethnicities Between 2010-2014 90

Racial Segregation According to the Theil Index, 2010 91

Estimated Percent of All People Who Were Black Between 2010-2014 92

Estimated Percent of All People Who Were Hispanic Between 2010-2014 93

Estimated Percent of All People Who Were Asian Between 2010-2014 94

National Origin 95

Region - LEP 96

Estimated Percent of All Households That Rent a Home Between 2010-2014 with R/ECAP Overlay 98

Estimated Percent of All Households That Own a Home Between 2010-2014 with R/ECAP Overlay 99

Estimated Percent Change in the Number of White People 2000 and the period 2010-2014 102

Estimated Percent Change in the Number of Black People 2000 and the period 2010-2014 103

Estimated Percent Change in the Number of Hispanic People 2000 and the period 2010-

2014 104

Philadelphia Gentrified Residential Tracts 2000-2104 (Pew 2016) 106

Estimated Number of HECM Originations Between 2014 and 2015.....109

Estimated Percent of All People Who Were White Between 2010-2014
With R/ECAP overlay.....116

Estimated Percent of All People Who Were Black Between 2010-2014
With R/ECAP overlay.....117

Estimated Percent of All People Who Were Hispanic Between 2010-2014
With R/ECAP overlay.....118

Estimated Percent of All People Who Were Asian Between 2010-2014
With R/ECAP overlay.....119

Estimated Percent of All People Who Were Foreign Born as of 2010-2014
With R/ECAP Overlay 121

1990 Demographics with R/ECAP 122

2010 Demographics with R/ECAP.....123

Percent of All Households That Are Single Female-Headed with Children in 2010
with R/ECAP Overlay 125

Racially and Ethnically Concentrated Areas of Poverty, 1990 with Promise Zone
and Choice Neighborhoods.....126

Racially and Ethnically Concentrated Areas of Poverty, 2000 With Promise Zone
and Choice Neighborhoods.....127

Racially and Ethnically Concentrated Areas of Poverty, 2010 with Promise Zone
and Choice Neighborhoods.....128

1990 2000 129

2010 129

Low and Declining DRR Value Between 2010-11 and 2014-15 (Annual Average) 132

Displacement Risk Ratio (2014-2015).....133

Displacement Risk Ratio 2015-2016.....134

DRR Value and Minority Population Lower North, West and South Philadelphia 135

DRR Value and Minority Population River Wards 136

Estimated Typical (Median) Year a Housing Unit Was Built As of 2010-2014
With R/ECAP Overlay 138

Number of New Construction and Improvement Permits in 2015
With R/ECAP Overlay 139

School Proficiency Index 141

Distribution of State and Local Revenue by District and Low-Income Students
by School in Pennsylvania 143

Race/Ethnicity 144

National Origin 144

Family Status 145

Community Schools and Racially- and Ethnically-Concentrated Areas of Poverty 146

Extent to Which the Difference Between Certified Supply and Demand Matches
the Expected Shortage, As of 2014 148

Extent to Which the Difference Between High Quality Supply and Demand Matches
the Expected Shortage, As of 2014 149

Labor Market Index Map - R/ECAP 153

Race/Ethnicity Labor Market 154

National Origin Labor Market 155

Job Proximity R/ECAP 156

Philadelphia Employment by Area 158

Philadelphia Residents Commuting to Jobs in Greater Center City 159

Transit Trips Index 162

SEPTA Regional Rail and Rail Transit 164

SEPTA Bus Routes 165

Low Transportation Cost Index 166

Estimated Travel Time to Work in Minutes 2010-2014 167

Transit Trips Index and Race/Ethnicity 168

Low Transportation Cost and Race/Ethnicity 170

Transit Trips Index and National Origin 171

Low Transportation Cost and National Origin 172

Access to Public Transportation in the Delaware Valley: Degrees of Disadvantage by Census Tract 174

Philadelphia Poverty and Transit Access to Downtown: 178

Low Poverty Index 180

Race/Ethnicity Index 181

National Origin Index (Jurisdiction) 182

National Origin Index (Region) 183

School Proficiency Index 184

Labor Market Index 184

Environmental Health Index 186

Race/Ethnicities National Origin 188

Estimated Typical (Median) Year Housing Unit Built, as of 2010-2014 with R/ECAP Overlay 189

Percent of Children Under Three Years in Philadelphia with a Lead Test with an Elevated Blood Lead Level 190

Asthma Hospitalization Age-Adjusted Discharge Rates by Zip Code Children Under 18, Medicaid Only, 2010-2014 193

Estimated Percent of Aduults Reporting to Have Asthma in 2013 194

Percent of All Address That Were Vacant in the Second Quarter of 2016 195

Philadelphia Life Expectancy by Zip Code 197

Bank and Credit Union Branches with R/ECAP Boundaries 201

Low-Income Housing Tax Credits (LIHTC) and Other Federal Housing Program Subsidized Units with Program Compliance Expiration Year 203

Rent Burden in Philadelphia by Census Tract 210

Severe Rent Burden in Philadelphia by Census Tract 211

Availability of Subsidized Housing Compared to Number of Rent-Burdened Households Paying More Than 30% of Income in Rent 212

Availability of Subsidized Housing Compared to Number of Severely Rent-Burdened Households Paying More Than 50% of Income in Rent 213

Housing Burden and Race/Ethnicity 214

Housing Burden and National Origin 215

Percent of All Households That Are Single Female-Headed with Children in 2010 with R/ECAP Overlay 219

Eviction as a Share of Rental Units, as of 2015 221

Estimated Count of Foreclosure Filings Between 2014 and 2016 Q2....223

Estimated Count of HEMAP Applications Between 2014 and 2016 Q@....225

Low-Income Housing Tax Credits and Subsidized Units 232

Concentrations in Persons with Disabilities in Philadelphia....273

Concentrations of Persons with Disabilities in the Region....274

Affordable, Accessible Housing North and West Philadelphia throughout Philadelphia....277

R/ECAPs, Persons with Disabilities and Multifamily Housing Development Since 1990 .278

Affordable, Accessible Housing in Camden, NJ 279

Affordable, Accessible Housing in Wilmington, DE 279

Affordable, Accessible Housing in Newark, DE 280

Distribution of Residents with Developmental and Psychiatric Disabilities, 2009 288

Housing Instability (FY14): Homelessness....295

Housing Instability (FY14): Behavioral Health....296

Housing Instability (FY14): Incarceration 297

Housing Instability (FY14): Aged Out Youth....298

Housing Instability (FY14): City-Funded Services 299

Section I.
Cover Sheet

I. **Cover Sheet**

1. Submission date: **December 21, 2016**
2. Submitter name: **City of Philadelphia & Philadelphia Housing Authority**
3. Type of submission (e.g., single program participant, joint submission): **Joint Submission**
4. Type of program participant(s) (e.g., consolidated plan participant, PHA): **Consolidated Plan participant and PHA participant**
5. For PHAs, Jurisdiction in which the program participant is located: **Philadelphia**
6. Submitter members (if applicable): N/A
7. Sole or lead submitter contact information:
   a. Name: **Melissa Long**
   b. Title: **Deputy Director for Policy & Planning**
   c. Department: **City of Philadelphia – Division of Housing & Community Development**
   d. Street address: **1234 Market St – 17th Floor**
   e. City: **Philadelphia**
   f. State: **Pennsylvania**
   g. Zip code: **19107**
8. Period covered by this assessment: **2017-2021**
9. Initial, amended, or renewal AFH: **Initial**
10. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;
11. The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 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 applicable.

    All Joint and Regional Participants are bound by the certification, 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.

    James F. Kenney (Signature) 12/20/16 (Date)
    Mayor, City of Philadelphia

    Kelvin A. Jeremiah (Signature) 12/20/16 (Date)
    President & CEO, Philadelphia Housing Authority

12. Departmental acceptance or non-acceptance:

    _____ (Signature) _____ (Date)

Section II.
Executive Summary

Executive Summary

The federal Fair Housing Act prohibits housing-related discrimination because of race, color, religion, sex, familial status, national origin or disability. The U. S. Department of Housing and Urban Development (HUD) and the agencies that receive HUD funding to implement its programs - such as the City of Philadelphia and the Philadelphia Housing Authority (PHA) - must not discriminate, and must also use those programs to affirmatively further fair housing.

To implement that charge, HUD adopted an Affirmatively Furthering Fair Housing (AFFH) rule on July 16, 2015 and issued a Rule Guidebook on December 31, 2015. The AFFH rule requires fair housing planning, the first step of which is completing an Assessment of Fair Housing (AFH).

Both the City and PHA are required to prepare the AFH, although on different schedules. However, to comprehensively assess fair housing conditions and needs in Philadelphia, the City and PHA agreed to prepare a joint AFH.

While PHA and the City have worked together on projects in the past, the AFH represents the first collaboration around fair housing planning. It is also an important step toward coordination of housing and community development programs and projects.

The City and PHA are pleased to submit their Assessment of Fair Housing to HUD for review.

The draft AFH was the result of significant research and data analysis, as well as a robust community engagement process that included:

- Upfront planning efforts to shape the community engagement strategy that, in addition to the City and PHA, included the regional HUD Office and a HUD-supported technical assistance team
- A survey, available online and on paper in both English and Spanish, that was completed by more than 5,000 residents, including more than 1,000 PHA residents
- Five community focus groups around the city, including one in Spanish and one geared toward people with disabilities
- Three "Resident Roundtables" for PHA residents that provided information on fair housing requirements and opportunities for resident input
- Three stakeholder meetings at which professionals working in fields that affect fair housing, affordable housing and equal opportunity offered information and recommendations

The final version is informed by additional public input, including:

- Three public hearings
- A second Spanish-language focus group
- Seven meetings with stakeholders to review and refine the AFH's goals and strategies
- More than 120 unduplicated comments received through the public comment process

That public input has informed each of the 11 goals outlined in the final AFH.

The foundation of the AFH is a wealth of data on housing, employment, transportation, education and other issues. HUD provided data in maps and tables, local experts provided additional data and mapping, and City and PHA staff identified relevant external research

Armed with resident input and detailed data analysis, the City and PHA examined

- Segregation and Integration
- Racially and Ethnically Concentrated Areas of Poverty
- Disparities in Access to Opportunities, such as
  - Education
  - Employment
  - Transportation
  - Poverty
  - Environment and Health
- Disproportionate Housing Needs
- Publicly Supported Housing
- Disability and Access
- Fair Housing Enforcement

As they examined these issues, the City and PHA considered contributing factors such as community opposition, displacement, public and private investment, discrimination, zoning and others.

Based on the feedback received through the public comment process, in particular from extensive meetings with stakeholders, the City and PHA identified 11 broad goals - along with 52 specific strategies - in this final AFH. The goals and strategies provide a framework for action to address fair housing issues in the coming years including efforts to be undertaken by the City, PHA and a wide range of community stakeholders. The AFH goals are:

Based on the feedback received through the public comment process, in particular from meeting with stakeholders, the City and PHA adjusted the goals and made significant revisions to the strategies. The final AFH includes 11 goals supported by 52 strategies. The goals are:

Enhance and expand resident mobility for voucher holders. This goal focuses on supporting PHA Housing Choice Voucher-holders who wish to find housing and other opportunities outside their current neighborhoods, particularly in high-opportunity areas.

Preserve existing affordable rental housing. This goal focuses on expanding programs and investments to prevent the loss of affordable rental units, especially in appreciating markets.

Develop new affordable rental housing opportunities. This goal focuses on expanding efforts to use public funds and policies and to leverage private investment to create new affordable rental housing opportunities.

Preserve existing affordable homeownership. This goal focuses on expanding efforts to invest in rehabilitation loans, foreclosure prevention and other efforts to prevent the loss of affordable homeownership.

Develop new affordable homeownership opportunities. This goal focuses on expanding efforts to create new affordable homeownership units.

Expand accessible and affordable housing for persons with disabilities. This goal focuses on expanding efforts to use public funds and leverage private investment to expand the supply of accessible, affordable housing and to remove barriers to accessibility in existing housing.

Expand permanent housing for homeless and special needs populations. This goal focuses on enhancing a broad array of efforts to provide permanent housing, including permanent supportive housing, for formerly homeless and special needs populations.

Ensure open access to all housing resources and programs. This goal focuses on expanding efforts to address the needs of people with Limited English Proficiency and people experiencing difficulty accessing affordable housing.

Expand fair housing outreach, education and enforcement. This goal focuses on engaging with fair housing advocates to better educate public agency staff, nonprofit partners and private landlords; providing support for tenants and homeowners facing fair housing issues; improving housing quality; and increasing capacity to enforce fair housing policies.

Use a coordinated approach to invest in struggling communities. This goal focuses on expanding place-based efforts to improve education, reduce vacancies, expand public amenities and address other challenges in neighborhoods currently not sharing in the City's growth.

Address the education, economic and income needs of people and neighborhoods. This goal focuses on investing in and supporting anti-poverty, economic development and educational programs that develop resident self-sufficiency and increase economic opportunity.

Achieving these goals will be a challenge in light of severe funding constraints. Both the City and PHA have experienced drastic reductions in federal funding over the past decade, and the new AFH requirements are not accompanied by any additional funding.

At the same time, however, there is a commitment to creatively use the limited funding that is available - including housing and other funds - to create opportunities in communities of choice. Both the City and PHA will also leverage private funds to create new opportunities.

The goals defined in the AFH represent a critical step toward increased fair housing opportunities. The AFH will inform the City's Consolidated Plan and PHA's Moving to Work plan. The goals will form the basis for the City's Annual Action Plan.

Throughout this process, the City and PHA remain committed to community participation. The AFFH rule envisions an ongoing dialogue between the public and recipients of HUD funds. The City and PHA look forward to continuing the AFFH conversation with Philadelphians over the next five years.

Section III. Community Participation Process

Community Participation Process

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 hearing 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 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.

The City of Philadelphia (through the Division of Housing and Community Development) and the Philadelphia Housing Authority (PHA) implemented a wide-ranging strategy to inform residents of the Affirmatively Furthering Fair Housing process and to gather input from residents on housing and opportunity issues. Over the course of 10 weeks prior to the release of the draft Assessment of Fair Housing, DHCD and PHA

- Created and updated informational web pages about AFFH
- Conducted a survey that received more than 5,000 responses
- Contacted 45 community groups to seek assistance distributing paper versions of the survey to residents
- With the assistance of the Neighborhood Advisory Committee program, held five community focus groups to get more individualized responses from residents, including Spanish-speaking residents and persons with disabilities
- Met with stakeholders to discuss the challenges and opportunities of organizations supporting housing and community development, providing services, and promoting and enforcing fair housing
- Conducted three meetings with PHA resident leadership to review and discuss AFH issues and priorities
- Used social and traditional media to promote the public engagement process

DHCD began engaging the public by creating two Affirmatively Furthering Fair Housing pages on its website, one in English (July 19, 2016) and one in Spanish (August 1, 2016), the language spoken by the most Limited English Proficient residents of Philadelphia. An AFFH graphic and links to the AFFH pages were added to the DHCD home page. Screen shots of the pages are in Appendix E. DHCD sought to promote the page via Twitter, tweeting in both English and Spanish. (Because there was virtually no engagement with the Spanish tweet DHCD did not use this strategy in later AFFH efforts.)

PHA created an AFH page on its website, which included links to HUD guidelines, to the DHCD website and the AFFH pages and maps described below, and to the English and Spanish versions of the online AFH survey, also described below.

On August 10, 2016, DHCD added to its website a link to an AFFH survey along with accompanying copy, again in both English and Spanish. (See below for specific survey information.) DHCD prominently displayed the surveys on its home page in the What's New section and by placing survey graphics in the first two slides of its home page slide show. Screen shots of the home page slider are in Appendix E.

On August 16, 2016, DHCD added AFFH maps to its website so that visitors could examine housing and other conditions in Philadelphia and measure the impact of those conditions on protected classes. The maps were prepared using HUD-provided data and with assistance from the HUD-provided technical assistance organizations.

The maps, with legends in both English and Spanish, measured eight conditions - subsidized rental units; housing cost or quality problem; homeownership rate; school quality; labor market contribution; transit usage; poverty and air quality. Next to those maps for easy comparison were maps depicting concentrations of protected classes - African-American Population; Asian American Population; Hispanic/Latino Population; Foreign-Born Population; Families with Children and Disabled Population. As with the other AFFH updates to the website DHCD placed information about the maps prominently on its home page in the What's New section and in the slide show and tweeted that it was available. Screen shots of the maps pages are in Appendix E. The maps in English are in Appendix E and the maps in Spanish are in Appendix E.

DHCD and the technical assistance team prepared the maps to make the HUD-provided data more accessible to a general audience. However, during the community participation process two organizations requested that more data and raw data be made available. DHCD responded by placing links to the HUD data on its website and referring to those links on the home page, on the AFFH page and on the maps page in both English and Spanish. Those pages went live on October 3 in English and on October 6 in Spanish. A screen shot of the home page is in Appendix E.

DHCD and PHA implemented a three-tiered strategy to encourage and broaden meaningful community participation and input in the AFH process.

The broadest public participation was sought through a survey that was made available on line, through community-based organizations and at PHA locations. DHCD led promotion of the online survey and outreach through the community groups with which it regularly interacts, while PHA focused on obtaining survey responses from its residents.

The survey was developed by Success Measures at NeighborWorks America, supported by funding from LISC. HUD TA provider the Lawyers Committee for Civil Rights Under Law reviewed a draft of the survey. Success Measures and city staff field tested the survey at a community organization and edited the questions based on feedback from the residents who completed the test survey.

Links to the survey, which was available in both English and Spanish versions, were posted on the DHCD and PHA websites on August 10, 2016, with a completion date of August 31, 2016. Use of a deadline is common in conducting on line surveys so as to encourage immediate completion of the survey by those who visit the survey page. The survey in English and Spanish is in Appendix E.

To promote the online survey, DHCD tweeted multiple times and encouraged organizations that follow DHCD to retweet or to tweet on their own. Over the course of the 21 days DHCD actively promoted the survey, 61 organizations tweeted or retweeted survey information to a combined audience of 334,000 followers. (Note that some followers are likely to be following more than one organization.) Among those retweeting were a reporter from the region's all-news station, the editor of Philadelphia Magazine, and two members of City Council, including the Council President. See Appendix E for a list of the agencies and people who tweeted and retweeted and samples of the tweets and retweets.

In addition, DHCD joined Nextdoor, an online community geared toward individual Philadelphia neighborhoods. By posting notice of the survey DHCD reached approximately 34,000 people. See Appendix E for DHCD's Nextdoor post.

Other electronic outreach included a DHCD email via Constant Contact to 1,155 individuals and organizations, an email to all 30,000 City employees, and electronic promotion from stakeholders such as the Philadelphia Association of CDCs, Philadelphia Corporation for Aging and the Philadelphia Redevelopment Authority. See Appendix E for examples.

DHCD sought to use traditional media to generate interest in and traffic to the on line survey. DHCD successfully scheduled an editorial board with the Philadelphia Tribune, a non-daily paper that focuses on issues of importance to the African-American community. The Tribune published a news story based on that editorial board meeting on August 16 (see Appendix E for copy).

DHCD sought to engage residents at the neighborhood level by distributing a press release to the city's neighborhood weekly newspapers on August 4 (see Appendix E for release). DHCD does not know how many weekly papers published a story related to the survey.

DHCD also sought coverage from Al Dia, a Spanish-language weekly newspaper. A meeting between Frederick S. Purnell, Sr., the City's Deputy Director for Housing and Community Development, and an Al Dia reporter was scheduled for August 11, but the reporter did not show. Attempts to reschedule the meeting were unsuccessful.

DHCD also reached out to WURD, a radio station with a large African-American audience, to attempt to schedule an appearance on WURD's morning program. Those efforts were unsuccessful.

DHCD recognized that not every Philadelphian has a computer at home and that some access computers at libraries and at neighborhood-based computer labs. To reach that population DHCD developed fliers to be posted over public computer terminals in those locations. DHCD provided those fliers to the Free Library of Philadelphia for posting in its 54 branches and to the Mayor's Commission on Literacy, which manages 79 KEYSPOT community computer labs.

As of August 31, when DHCD stopped promoting the survey, more than 3,400 surveys had been completed on line.

DHCD and PHA understand that many Philadelphians cannot access an online survey either at home or through a computer lab. Accordingly, paper surveys - in both English and Spanish - were made available.

To distribute the paper surveys into neighborhoods, DHCD reached out to 45 community organizations for assistance (see Appendix E for outreach letter and organizations contacted.) Each organization was mailed 25 paper surveys and an addressed, stamped envelope in which to return them to DHCD. Organizations serving the Hispanic community were provided with both English and Spanish versions of the survey.

In addition to providing English and Spanish surveys, DHCD reached out to organizations serving the Chinese, Vietnamese, Russian and Cambodian communities for assistance obtaining input from LEP residents speaking those languages. DHCD received surveys from the Philadelphia Chinatown Development Corp. It does not know the extent to which the other organizations engaged the communities they serve. Community organizations returned more than 500 completed paper surveys to DHCD.

PHA led the effort to encourage PHA residents to complete electronic and paper surveys. The citywide PHA Resident Advisory Board, supported by PHA's Community Operations and Resident Development Department, organized efforts around the city - including door-to-door canvassing - to encourage residents to complete the survey.

Fifty-three on line survey respondents said 'yes' to the question of whether they rented from PHA, and 29 on line respondents said 'yes' to the question of whether their rent had been paid by a Housing Choice Voucher in the past five years. PHA residents completed more than 1,100 paper surveys, which PHA delivered to DHCD for entry into a separate survey collector.

Between the online survey, the paper surveys distributed and collected by community groups and the paper surveys distributed and collected by PHA, 5,245 surveys were completed. Of those, 49 were completed in Spanish. (See below for discussion of this low Spanish-language participation rate.) See Appendix E for a summary of survey results.

Residents in every ZIP code in the city completed surveys, including those containing R/ECAP areas. More than 900 surveys came from residents in ZIP codes with significant R/ECAP areas.*

The survey also provided a means to keep residents engaged as the AFH process moves forward. Respondents could provide their emails so that they could be apprised as to when the report based on their responses was made public, and more than 2,350 respondents provided emails.

In an online or paper survey the respondent can only answer the questions asked by choosing from the answers offered. To get a deeper sense of the individual experiences of Philadelphia residents, DHCD and PHA conducted five focus groups.

Led by professional facilitators, the focus groups sought input from residents throughout the city, including Spanish-speaking residents and residents with disabilities. To recruit participants for these focus groups, DHCD used leaders from its Neighborhood Advisory Committees to identify and initially reach out to potential attendees. DHCD worked with the Planning Commission's Citizen Planning Institute to offer graduates of that program the opportunity to participate. PHA recruited residents of public housing to participate. For the Spanish-language focus group DHCD reached out, through the facilitator, to organizations serving the Hispanic community, and DHCD engaged Liberty Resources, a Center for Independent Living (CIL) in Philadelphia, to both host and recruit for the focus group for people with disabilities.

DHCD, PHA and advocates within the Latino community were disappointed with the focus group conducted in Spanish. The number of participants, the structure of the focus group and other factors produced more of a question and answer session than a true focus group.

DHCD and PHA therefore worked with representatives of the Latino community to gather further resident input through a second Spanish-language focus group. On Nov. 1 representatives of DHCD

** ZIP codes and R/ECAP areas do not align exactly. This figure was derived by totaling surveys from ZIP codes with significant R/ECAP areas. Surveys from ZIP codes with very small portions of R/ECAP areas were not included.*

and PHA met with representatives of the Latino community to begin to plan the focus group. DHCD and PHA drafted a Request for Proposals for a focus group facilitator who could conduct the focus group in Spanish, and incorporated feedback from the Latino representatives. After a facilitator was selected, DHCD, PHA and the Latino representatives first met amongst themselves to identify the core issues the focus group should cover and then met with the facilitator to review the project and to prepare for the focus group. The focus group took place on Dec. 1.

Focus Group Recruitment

DHCD employed grassroots strategies to identify and recruit participants in its community focus groups. It engaged its Neighborhood Advisory Committees, or NACs. NACs are community-based nonprofits that lead and engage neighborhood residents around housing and community development issues. A map listing the NACs, their neighborhood coverage areas and their relation to R/ECAP areas is on the next page.

DHCD worked with the Citizens Planning Institute (CPI) to invite its program graduates to attend. CPI is the education and outreach arm of the Philadelphia City Planning Commission. CPI's seven-week course empowers residents to take a more active and effective role in shaping the future of their neighborhoods. The email sent to CPI graduates about the community focus groups is in Appendix E.

To recruit for the Spanish language focus group Rosales Communications, the convener/facilitator retained by DHCD, reached out to respected organizations in the Latino community. Rosales sought recruitment assistance from Asociación Puertorriqueños en Marcha, Aspira, Ceiba, Congreso, Juntos, New Kensington CDC, Norris Square Community Alliance, and South Kensington Community Partners. The flier used to help recruit participants is in Appendix E.

Ceiba, a coalition of Latino organizations, recruited the participants for the second Spanish-language focus group.

To recruit people with disabilities for the final focus group, DHCD engaged Liberty Resources to both host the focus group and recruit participants. Liberty Resources is the Center for Independent Living for the Philadelphia area, and it advocates for and works with persons with disabilities to ensure their civil rights and equal access to all aspects of life. Liberty's office and the three main transit stops that serve it - 8th Street on the Market-Frankford Line, 8th Street on the Broad Ridge Spur and the Jefferson Station Regional Rail Station - are all accessible.

The scheduling of the focus groups was designed to include opportunities for meaningful public participation. Each focus group was held in the evening. (At the suggestion of disability advocates, the disability focus group was held from 4:30-6:30 to allow for greater public transit opportunities.) Each focus group was held in a well-known community-based location. Each of those locations was accessible via public transportation.

In addition, PHA engaged residents in three presentation/planning sessions to review the AFFH requirements, discuss the survey process and identify issues of importance to PHA residents. Resident Roundtable sessions that focused on AFH were conducted on July 13, August 18 and October 12, 2016. The sessions included the Resident Advisory Board (RAB) members and other resident leaders. For the July session, 70 persons were in attendance. For the August session, there were 57 attendees. For the October session, there were 39 attendees. Sign-in sheets are on file at PHA (they are not included in this report as they include personally identifying information such as phone numbers). PHA also met with PHA resident leadership on November 14 following issuance of the draft AFH to review and discuss the document and the proposed goals and strategies. The meeting, attended by residents from developments across the City, provided an opportunity for residents to discuss key findings and to respond to proposed priorities.

Neighborhood Advisory Committees with R/ECAP Overlay

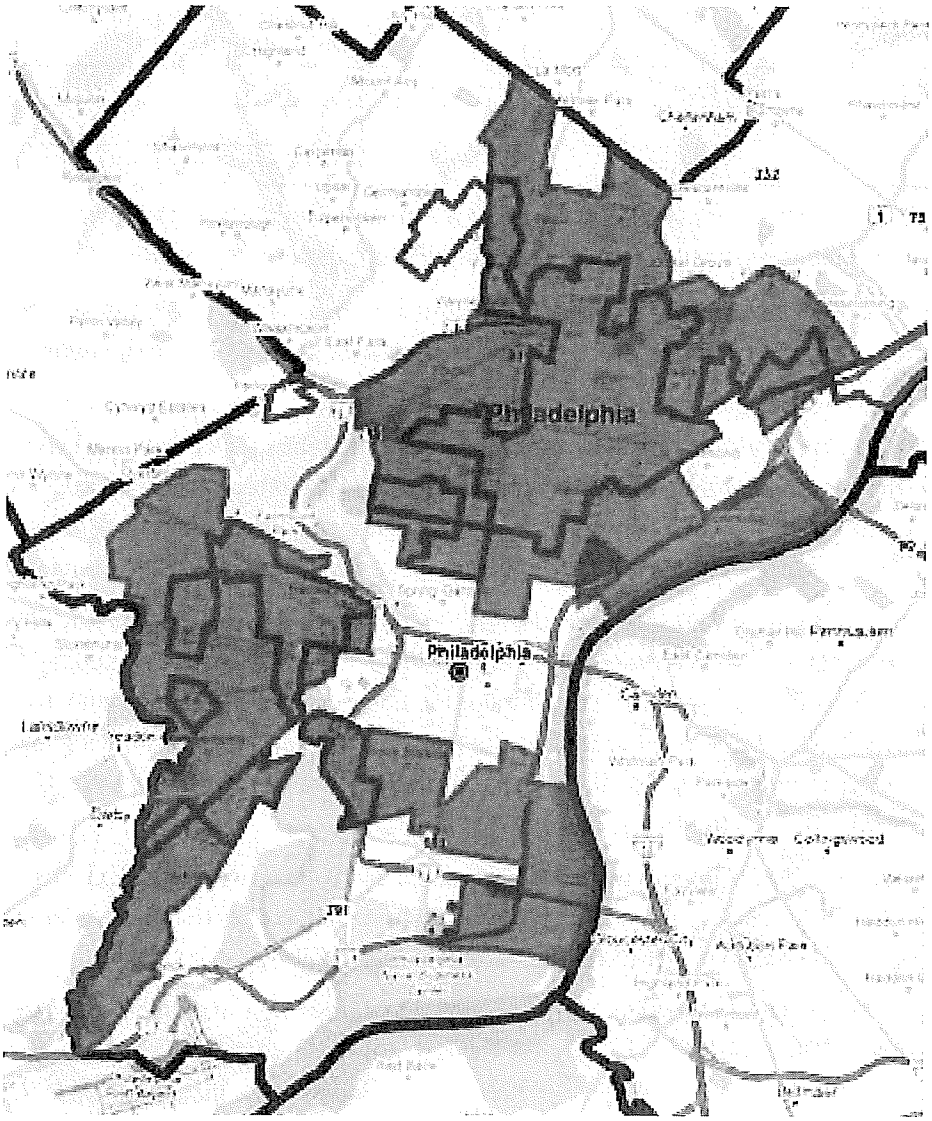

Table 1: Focus Group Summary

Date	Neighborhood	Host	Attendees	Comments
July 13	Citywide	PHA	70	
August 18	Citywide	PHA	57	
August 31	West Philadelphia	Enterprise Center	11	
September 6	South Philadelphia	Diversified	14	
September 13	North Philadelphia (east of Broad Street)	HACE	27	Focus group held in Spanish
September 15	North Philadelphia (west of Broad Street)	Nicetown CDC	18	
September 20	Citywide	Liberty Resources	12	Attendees were people with disabilities
October 12	Citywide	PHA	39	
November 14	Citywide	PHA		
December 1	Citywide	Finanta	13	Focus group held in Spanish

A light dinner was provided for attendees and each received a Rite Aid gift card as a thank you for participating. (Note that compensation for participants is a standard focus group procedure.)

Summary reports of the focus groups held in English and Spanish are in Appendix E. Sign in sheets are on file at DHCD. They are not included in this report as participants were promised anonymity to encourage full participation.

DHCD and PHA recognize that there are LEP communities in Philadelphia that speak languages other than Spanish. However, the compressed time frame for completing the AFH limited the LEP outreach. DHCD has contacted the office of Councilwoman Helen Gym for assistance with conducting a future focus group in Chinese, the most prevalent non-English language spoken in Philadelphia after Spanish.

In addition, to begin a more detailed dialogue with the Chinese-speaking community, on Nov. 21 representatives of DHCD and PHA met with representatives of the Philadelphia Chinatown Development Corporation (PCDC). The meeting focused on Asian immigrant communities in general and the Chinatown community specifically. PCDC participated in the process to strengthen the Plan's goals and strategies, and recruited a number of residents with ties to the Chinatown community to testify at the public hearings held by DHCD and PHA.

In addition to engaging residents through a survey and focus groups, DHCD and PHA sought input from individuals and organizations that have a role in promoting fair housing and access to opportunity in Philadelphia and the region. To do so, DHCD hosted three stakeholder meetings at its offices.

The first, on September 12, included nonprofit and for-profit developers and affordable housing advocates. The second, on September 19, was geared toward service providers. The third, on September 26, encompassed others who have a role in housing and opportunity, including funders, analysts, universities, transportation organizations and others. Each stakeholder meeting had a

discussion outline specifically developed for the focus area of that group. The discussion outlines are in Appendix E.

Fair housing advocates and monitors were invited to and attended each session to ensure that the fair housing perspective was included in each meeting. Although each meeting had its own focus, participants were not limited to that focus. DHCD developed the discussion outline, but each session was facilitated by leaders of outside organizations.

Table 2: Stakeholder Meeting Summary

Date	Focus Area	Facilitators	Attendees	Groups Represented
September 12	Development of Affordable Housing	Philadelphia Association of Community Development Corps Project HOME	19	Fair housing advocates, nonprofit developers, for-profit developers.
September 19	Service Provision	Philadelphia Association of Community Development Corps Liberty Resources	18	Fair housing advocates; service providers related to people with disabilities, education, children, the homeless.
September 26	Other aspects of fair housing and access to opportunity	LISC Federal Reserve Bank of Philadelphia	15	Fair housing advocates, foundations, lenders, higher education, transportation.

A summary and transcript of the September 19 and September 26 sessions are in Appendix E. A summary of the September 12 meeting (for which DHCD was unable to obtain a court reporter) is in Appendix E.

Subsequent to the publication of the draft Assessment of Fair Housing DHCD and PHA continued to engage stakeholders around fair housing issues in general and the AFH goals and strategies in particular.

Working with technical assistance providers supported by HUD, DHCD and PHA implemented a stakeholder engagement process around the goals and strategies in the draft Assessment of Fair Housing. The goals and strategies were divided into three subject areas:

- Preservation of Existing Housing and Development of New Housing
- Fair Housing - Outreach, Training, Enforcement and Legal Strategies
- Place-Based Strategies and Quality of Life/Access to Opportunities

A wide range of stakeholders was invited to participate in whichever subject area they felt was relevant to their work, including in all three if desired. The TA-provider created a cloud-based mechanism in which stakeholders could add comments and edit text related to the goals and strategies. For each subject area an initial meeting/conference call was held in which participants brainstormed

about means to improve the goals and strategies. Subsequently participants uploaded comments and edits to the cloud. DHCD and PHA staff adapted the comments made on the calls and in writing into updated goals and strategies, which were then reviewed in a subsequent conference call for each subject area. In all, a total of six meetings/calls were held to strengthen the goals and strategies section of the plan. This process concluded with a four-hour meeting at which participants worked collaboratively with the City and PHA to identify priorities among the goals and strategies.

This process did not lead to additional goals. Indeed, one goal was folded into another. However, the strategies to reach the goals were significantly expanded, from 32 to 52. The goals and strategies begin on page 316.

Provide a list of organizations consulted during the community participation process.

- DHCD and PHA engaged more than 80 organizations during the community participation process.
- As noted earlier, DHCD contacted 45 organizations directly (as opposed to a blast email) for assistance in promoting, distributing and collecting its resident survey. Those organizations are listed in Appendix E.
- DHCD or its representatives contacted 15 community organizations to recruit participants for the neighborhood focus groups. Those organizations are listed in Appendix E.
- DHCD invited nearly 60 organizations to participate in the stakeholder meetings and more than 50 people attended one of the three meetings.
- Three organizations contacted DHCD during the course of the community participation process to express concerns about that process. DHCD sought to address the issues raised with interim responses via phone and email, and in a final written response. The letters and the DHCD final responses are in Appendix E.

How successful were the efforts at eliciting meaningful community participation? If there was low participation, provide the reasons.

DHCD and PHA are pleased with the level of meaningful community participation in the AFH process. More than 5,200 people, representing every neighborhood in the city, completed the survey. In addition, more than 2,350 people who completed the survey provided an email address that will enabled DHCD and PHA to alert them as to when the AFH is available for review and public comment.

The focus groups represented a broad cross-section of Philadelphia. The 95 participants represented 40 neighborhoods. Fifty own their own homes, 43 rent and two were homeless or displaced. Seventeen were residents of public housing and seven hold housing choice vouchers. Forty spoke Spanish and 14 are disabled (both over-representations of the general population because specific focus groups were held for those constituencies).

The stakeholder meetings brought together diverse organizations with different roles in creating fair housing and access to opportunities. The PHA resident sessions provided opportunities for residents

from PHA communities around the City to learn about AFH and express their views on neighborhood priorities.

Neither DHCD nor PHA led the focus groups or the stakeholder meetings. This strategic decision was made to give the participants the confidence that they could criticize the agencies. Indeed, this strategy worked as participants in each set of meetings criticized, in some cases strongly, DHCD, PHA and the City in general.

Where the process was less successful was in engaging LEP persons to complete the survey.

Spanish LEP persons comprise 3.91 percent of the city's population, yet completed less than one percent of the surveys. This may be because DHCD was unsuccessful in gaining coverage in the city's Spanish-language newspaper.

Other than in Chinatown - and it is unknown how many of the returned surveys from Chinatown were from LEP Chinese-speakers - DHCD appears to have been unsuccessful in obtaining survey responses from LEP persons who speak Vietnamese, Russian or Cambodian. This is likely because the timeframe in which to complete the AFH Plan did not allow for continued, ongoing outreach to those communities.

During the primary engagement time period and in the subsequent public comment period, residents and organizations raised concerns about the public engagement process. The primary concerns related to the time available for outreach, the outreach to LEP communities, the means of outreach, and whether specific neighborhoods, in particular Northeast Philadelphia, were excluded from outreach.

DHCD and PHA acknowledge that the compressed timeframe for community engagement limited the outreach that could be conducted, both in general and to the numerous LEP communities in Philadelphia. Similarly, while DHCD reached out to 45 community organizations to assist with community outreach and weekly papers across the city to publicize the survey, with more time more could have been done.

During the community outreach DHCD and PHA made no efforts to either include or exclude specific neighborhoods from the process. Indeed, in addition to general outreach more than 37,000 surveys were sent via Next Door directly to residents of Northeast Philadelphia and more than 500 surveys were received from residents of the Northeast. Six residents of Northeast Philadelphia participated in the focus groups.

Throughout this process DHCD and PHA have made clear that the AFH is intended to be the start of an ongoing conversation. Toward that end DHCD will conduct a Chinese-language focus group in 2017. DHCD and PHA will continue to engage Philadelphia's residents and the organizations that represent and serve them.

Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.

The community participation process conducted by DHCD and PHA provided both quantitative and qualitative input. For the purpose of this section some of the quantitative input is presented as comments.

More than 5,000 residents completed the survey that DHCD and PHA made available on line and on paper. Among the results:

- Affordability of housing (46 percent) and to be near public transportation (43 percent) were the top reasons respondents decided to live in their neighborhood
- Nearly 69 percent of respondents would continue to live in their neighborhood and more than 65 percent would recommend their neighborhood as a good place to live
- Of the 2,300 respondents who had looked for housing in the past five years, 60 percent had trouble finding safe, quality housing they could afford in a neighborhood they would like to live in
- Of the 1,400 who listed the conditions that limited their housing options
  - More than 80 percent cited what they could afford to pay
  - Other financial issues included amount of money available for a deposit (48 percent) and credit history/score (27 percent)
  - Housing large enough for the household was an issue for 27 percent

The community focus groups and the stakeholder meetings provided qualitative input. That input is grouped below into Housing and Access to Opportunities categories. The comments below do not necessarily reflect a consensus on specific points; however, they do reflect the opinions of one or more participants.

Housing

General

Investment Choices

- Non-choice/low-income neighborhoods need increased investment of affordable housing and other amenities
- More affordable homeownership opportunities are needed
  - Promote in low-income areas
  - Restrictions on HOME funding and FHLB designations restrict types of developments
  - Balance affordable housing in appreciating communities with investments in poor communities
- Promote more mixed income housing
- Focus on housing next to transit
- Turn abandoned HUD houses and vacant lots into new housing

Funding and Development

- Union labor rates are too high for affordable developments
  - Negotiate affordable housing project labor agreements
  - Redirect project savings into community assets
- Low Income Housing Tax Credit (LIHTC) developments should be eligible for City property tax exemptions
- Expand the Housing Trust Fund
- Project development timelines and funding deadlines should be linked and coordinated
- Promote for-profit/CDC partnering
- Partnering with faith-based organizations
- Banks not sure how to address deed restrictions

Planning

- Developments should be presumed acceptable if they comply with a community plan

Resident Issues

- Extend affordability beyond the compliance period
- Keep people in their neighborhoods whether displacement is due to gentrification or disinvestment
- Redlining and predatory lending still exist
- More rental assistance
- Need rent control/protection for long-term renters
- Reconsider income guidelines for housing programs
- Reduce evictions and forced move outs
- Provide legal representation to homeowners and tenants in foreclosure and eviction proceedings
- Update rent-to-own laws
- Downpayment, credit score and insurance requirements are regulatory bars to homeownership

Disability

- Increase affordable, accessible housing
- Need more housing with first floor access and living space
- Fund accessibility improvements for adopters of children with disabilities
- City should have a visitability ordinance
- 13 percent of new units should be accessible
- Expand Adaptive Modifications eligibility

Other

- Collect more data on ethnicity/LEP
- Educate landlords around LEP
- Provide information about discrimination against renters

Fair Housing

- Developers need to highlight that homes are not preleased and that there will be a fair marketing process to select residents
- There needs to be education around eligibility criteria for units
- Community residents can't afford workforce housing
- Need widespread education about fair housing
  - City Council, City Departments, private developers and City-supported groups
  - So that CDBG spending meets program requirements
  - Better understanding of protected classes and discrimination
  - People don't know they can't discriminate against families with children
- Better identify fair housing issues
- Begin fair housing education at a young age
- Difficult to find housing for large families
  - Bedroom requirements (minimums for family size, boys and girls can't share bedrooms) a problem
- Need to incentivize private landlords to make units accessible
- People with mental health issues (a disability) don't know about services
- Forms highlighting disability promotes discrimination
- Need more capacity for investigation and enforcement
- Need more tools to fight discrimination
- Need more outreach by the City to Advocates who support protected classes
- Housing agencies need Language Access Plans and to provide data on them
- Private law firms don't see housing issues as fair housing issues
- Review legislation and policies through a fair housing lens
- Create Disability Advocate

Community Engagement

- There needs to be more community engagement - residents should be engaged from the start
- Political support is necessary for affordable and market rate housing to overcome community opposition
- Affordable housing developers need to educate the public about the quality of the proposed housing and the income levels it will serve
- HUD should make clear to developers when (in the development process) they need to go to the community
- Fund community planning
- Engage youth and young people around planning and development

New Housing

- Must retain ability to develop affordable housing in impacted neighborhoods
- It is too easy for people to appeal zoning; one person can hold up a development
- Stormwater and other green elements are increasing costs
  - Consider making practices like Passive House optional
- LIHTC criteria includes points for developments in high opportunity areas that will be difficult to find locations for (i.e. high performing schools)
- Zoning for LIHTC developments should be by-right
- Incentivize affordable housing in "cost-less" ways such as zoning and density bonuses
- Density bonuses for affordable housing in market-rate developments is good
  - Provision of units is preferable to payment into the Housing Trust Fund
  - Developers must be held accountable for living up to the agreement
- Density bonuses should be expanded to include lot coverage that will enable increased development on the lot
- Make benefits of new housing available to all community residents
- HUD should consider making income averaging eligible to be used to create inclusion and enable more development in middle markets
- Developers need parking requirement relief
- Maintain 10-year tax abatement

Housing Preservation

- Housing preservation and neighborhood preservation is a high priority among stakeholders
- Preserve housing through home improvements, housing counseling and foreclosure preventions
- Housing counseling is a priority
  - Increase support and accountability
- Maintain and weatherize existing homes
- Prioritize tax credits for preservation
- Financial education is needed to help keep people in their homes
- Tangled title support is important to keep people in their homes
- Position preservation of existing homes as a development opportunity (more robust than BSRP)
- Educate homeowners that increased equity is an asset (and to beware of scams to sell at below market value)
- Make lending available for home improvements to residents around new developments
- Restore programs like HRP and THPP
- Address lead paint contamination
- Provide education, tax relief and home modification services to enable people to age in place
- Seniors need assistance with bill paying
- Mom and pop landlords lack resources to do repairs
- L&I needs to enforce rental repair needs
- More code enforcement
- Tax foreclosure prevention programs aren't sufficient
- Preserve and protect intergenerational homes
- Protect existing housing without money by using good cause protections
- Create self-help groups for home repair/rehab

Public Housing

- Capital funding is needed to preserve PHA's aging developments
- Some PHA residents concerned about gentrification in their neighborhoods
- PHA has increased vouchers by more than 3,800 over past three years
- PHA residents need to more closely reflect the ethnicity of the city
- PHA has implemented LEP Policy and Language Access Plan
- 13 percent of new PHA units should be accessible
- Expand subsidies and vouchers and the acceptability of vouchers

- City and private sector needs to continue investing in distressed areas in and around existing PHA developments in order to improve opportunities and remove barriers for residents
- Provide more information about Housing Choice Voucher rules
- Faster and easier processing of subsidies and financial support
  - Too long before HCV opened to new applicants

Emergency Housing

- Shelter system not set up for seniors
- Homeless Services has a program to provide security deposits for survivors of domestic violence seeking to move that must be publicized more
- Need educational programs for women and children in shelters

Access to Opportunities

Neighborhood Issues

- Rec centers, schools, bridges, and sidewalks are needed in low-income communities (and will help reduce crime)
- Safety improvements such as lighting are needed to create safe blocks and crack down on drug corners
- Community residents should get employment opportunities when developments require union labor
- Provide support for people who already live here (especially seniors)
- Transportation costs are too high
- Need more transit accessibility for women and children
- Transit oriented development is of limited value if transit accessibility isn't also addressed
- Education about the availability of public transit, especially regional rail
- Require developers to hire local people when developer gets an abatement
- Need investment to create employment in low opportunity areas
- Invest in child care
- Build mixed income communities
- Use New Market Tax Credits
- Focus resources to create job experience for youth 14+
- Prepare youth for college early
- Require developers to do education around tax programs
- Support vulnerable populations - domestic violence survivors, returning citizens, 18-24 year olds, seniors, disabled

- City engage other cultures
- Create more environmental amenities (especially water)
  - Use vacant lots for green space
- Stop auctioning properties to developers
- Community banking should be encouraged

City Issues

- Time and coordinate neighborhood investments (i.e. housing, PGW) so as to not tear up streets after projects completed
- Coordinate public services such as rec centers and transportation
- Better coordination between City agencies around data
- Educate staff to be more knowledgeable regarding City programs
- Need video phones in City offices to enable better access for deaf people
- Schools are not accessible to people with disabilities
- Public transit riders with disabilities do not always get the assistance they need into their final destination
- Government agencies are non-compliant with ADA
- Accessibility requirements need to be enforced
- Tax assessments are unfair
  - Relief for low-income residents
- Tax abatements and TIFs are making things worse
  - Give tax breaks to long-term residents instead of developers
- The Land Bank needs a strategic plan
- City agencies need Language Access Plans
- Increase minimum wage
- Need civilian oversight of city agencies providing support

Thirty-one people and organizations offered more than 120 unduplicated comments in writing or via testimony at one of three public hearings. Those comments were:

1. AFH does not deeply consider the specialized needs of survivors of domestic violence as a vulnerable population
2. PHA should provide tenant DV survivor w/a Housing Choice Voucher w/in one week of DV transfer
3. Tenant should not be considered to have abandoned a PHA unit if they continue to pay rent while out of unit due to DV
4. PHA waive 30-day notice of lease termination in cases of DV
5. PHA should issue a specific project-based RFP w/a DV preference

6. City consider adopting an admissions preference for DV victims
7. AFH should include a goal of incentivizing mixed-use developments with child care centers in R/ECAP areas that fulfill multiple identified community needs at once
8. AFH should include a goal of incentivizing affordable housing development in R/ECAP areas that is part of a neighborhood revitalization plan or responsive to a specific identified need for additional affordable housing
9. Incentivize affordable housing development and preservation (longer term commitments of subsidy funding, tenant's rights of first refusal, longer affordability periods) in areas w/high DRRs
10. Goals around preservation of expiring properties should include private and nonprofit developers as partners
11. AFH should include goals around pro-active preservation measures
12. Include more specific detail about mixed use developments, including how they will coordinate w/neighborhood planning to ensure market-based financial feasibility and stability of projects
13. Analyze how to leverage childcare subsidy to support mixed-use development in R/ECAP areas
14. Specifically identify Mixed Used Development Tax Credit as a tool
15. Research how zoning and land use can be a tool of community opposition in high opportunity areas, include analysis of inclusionary zoning best practices
16. Identify clear path to land acquisition/disposition in high opportunity areas including all City landholding agencies
17. AFH should identify importance of healthcare providers and the role they can play in improving housing quality
18. Include innovative approaches to code enforcement w/incentives and sanctions for landlords
19. Detail existing efforts to address housing quality
20. Include goal toward improving housing quality for renters w/Licenses and Inspections and health care industry as partners
21. Include information from police about illegal evictions
22. Explore possibility of increased sanctions for landlords who practice illegal evictions
23. Legal representation should be a goal to address illegal evictions and housing instability
24. AFH should include a goal directly addressing housing instability w/metrics such as evictions, involuntary displacement and/or foreclosure
25. Include Police Department, legal services and Sheriff's office as partners in involuntary displacement
26. Assess issues and create goals around minimizing barriers to housing for returning citizens
    a. Detailed information on PHA admissions policies and barriers
    b. Barriers in the private market
    c. Departments of Prisons (Phila) and Corrections (PA) listed as partners

27. Analyze how current resources can be utilized most efficiently to address homelessness
28. Include goals around best practices such as housing first and permanent supportive housing
    a. Include roles of PHA, Phila Police Dept and agencies within Phila Health & Human Services
29. Create goal around use of PHA resources with HHS departments, including HCV program
30. Provide detailed assessment of current PHA practices and national best practices regarding partnerships w/HHS departments
31. Add specific goal around using 4% LIHTC to Phila's low-income communities
32. Include State and Federal Housing Trust Funds
33. Use RAD funds in private affordable housing developments, not just PHA preservation
34. Identify strategies around Mixed Use Development Tax Credit
35. Allocate resources toward long-term solutions paired with mental health and addition services can help address chronic street homelessness
36. Employ early interventions to stabilize, education, employ and empower young adults leaving foster care
37. Expand access to addiction treatment
38. Analyze the extent to which financial institutions are equitable maintaining or marketing bank-owned properties
39. Avoid labeling or targeting certain communities are more befitting of a bulk sales or investor purchase strategy
40. Promote sale of bank-owned REO properties to owner-occupants over investors
41. Establish robust vacant property registration and maintenance requirements to provide transparency regarding ownership and servicing of REO properties
42. Carefully review all strategies to address blight for impact on city's residents of color
43. AFH should identify a strategy to hold lenders to obligations under the Fair Housing, Equal Credit Opportunity and/or Community Reinvestment acts.
44. The public engagement process did not provide residents of Northeast Philadelphia with adequate opportunity to participate in the development of the AFH
45. Concerns of community residents are dismissed as "community opposition" or "NIMBY-ism"
46. Opposes recommendation to make publicly subsidized housing developments by-right under the zoning ordinance
47. The AFH drafting process should be reopened to allow additional participation
48. Opposed to additional section 8 and HUD housing in Somerton
49. Strongly opposes implementation of "fair housing" model
50. AFH is unconstitutional and should be rewritten
51. Strongly opposes this forceably imposed new regulation

52. Allow for more fair housing in Chinatown
53. Public engagement process did not engage LEP persons
54. Survey was not statistically significant
55. Surveys not completed in Chinese
56. Goals and priorities do not offer specifics with numerical objectives
57. PHA has failed to fully implement LEP language policy
58. Identify places like Chinatown as hubs to receive special consideration and protection
59. More needs to be done to provide housing assistance to Asian immigrants by both City and PHA
60. Disagree with data that says that Asians are closer than other minorities to jobs, healthcare, transportation and schools (proximity does not equal access)
61. Asian census data should be disaggregated
62. Address engagement and needs of the LEP community
63. AFH notes but does not address environmental risks
64. No goal addresses need of Chinatown or Asian community
65. Agree with twelve items City has identified, with emphasis on Goals I-V
66. PHA should continue to build and develop affordable housing
67. Help the homeless and veterans
68. 40,000 vacant homes should be rehabilitated and provided to the homeless and needy (35/12)
69. Provide more good quality, affordable housing in Chinatown
70. Identify areas of high opportunity for particular groups (such as Chinatown)
71. Provide more housing assistance and other resources to Asian immigrants
72. Health care services need to be provided in the community in native languages
73. Preserve network of bilingual institutions in Chinatown to enable residents to obtain health care
74. AFH fails to identify host of factors impacting tenants
    a. High rates of eviction in rapidly appreciating neighborhoods
    b. Voucher/income discrimination in high opportunities areas
75. R/ECAP section omits discrimination against women with children, domestic violence survivors, racial and ethnic minorities, LEP communities
76. AFH should acknowledge its limitations in obtaining data on illegal or non-court ordered evictions
77. Gender and familial status discrimination and status as victim of domestic violence as contributing factors to segregation of housing access disparities not discussed

78. Publicly Supported Housing Analysis section should include deeper, more specific analysis
    a. By R/ECAPs
    b. By additional disparity factors such as persistent/generational poverty, domestic violence and sexual assault, gun violence, limited English proficiency, and disability
79. Reference changes in Blueprint to End Homelessness program
80. Issues with Rental Assistance Demonstration conversions
    a. Exclusion of RAD Component 2 data
    b. HUD makes little information available about properties converting to RAD under component 2
    c. Data vary from HUD data and previously released PHA data
81. Missing information in Publicly Supported Housing Analysis section
    a. Environmental hazards and habitability complaints
    b. Public housing and private housing admissions and occupancy policies
    c. Waitlists exceeding availability of units
    d. Voucher/income discrimination
    e. Lack of landlord knowledge/investment in HCV program
    f. Evictions and program terminations based on economic factors or substandard housing conditions
82. Future versions of AFH and forthcoming Consolidated Plans should be more direct about goals and strategies to address racial and ethnic disparities in housing and to create more concrete metrics and milestones
83. Creating housing in high opportunity areas must be in addition to and not a replacement of investments in struggling neighborhoods
84. Concrete goals for number of units to be produced and households to be served by strategies should be included
85. Kenney Administration should withdraw from plans to securitize tax liens, which will create a barrier to the Land Bank's ability to acquire properties for assemblage and redevelopment
86. Dedicated funding for Philadelphia Housing Trust Fund should be doubled
87. PHA and DHCD waiting lists should remain open
88. Provide more supportive, multi-lingual services for newcomers to Philadelphia who are LEP
89. Create and support multi-lingual health education efforts
90. Work with hospitals and health care providers to create multi-lingual signs, educational literature and health system navigation programs
91. Work with local health systems to collect more disaggregated data on diverse ethnic communities
92. Prioritize screening for hepatitis B

93. AFH is missing deep discussion of housing quality, especially in communities of color
    a. Data are available from L+I, Health
94. Goals are disconnected from problems
    a. Rental housing, housing instability, evictions
    b. Healthy Rowhomes
    c. Vacant land
    d. Communities at risk from displacement
95. PHA should consider how expensive redevelopment plans interact with mission to house as many people as possible
96. More diversity is needed among people who live in PHA housing
97. Analyze contributing factors to reduce impact
    a. Housing cost burdens, housing quality, housing instability, involuntary displacement
    b. Communities of color disproportionately affected
    c. Use L+I and community-level data
98. Analyze contributing factors to low participation rates
99. Community engagement was insufficient
100. Goals are non-specific and unprioritized and continue existing strategies
101. More HUD-based vouchers need to go to veterans, especially veterans with medical conditions
102. There need to be more and better strategies to use REOs to prevent homelessness, including property donation process
103. Increase the amount of accessible PHA housing to 20 percent
104. Provide more accessible, affordable integrated housing so people with disabilities can leave nursing homes
105. Provide accessible shelters
106. Goals for survey completion should have been included
107. Survey should have been less reliant on electronic distribution and gone to locations that are more accessible to lower-income Philadelphians
108. Statements from focus groups and stakeholder meetings are organized in an unclear manner
109. A map of white, non-Hispanic concentration should be included
110. Unemployment data should be broken down by race and gender
111. Unemployment rate is an inadequate measure of unemployment; other measures should be included
112. Poverty data should be broken down by race and gender
113. Poverty rate is an inadequate measure of poverty because it is outdated. Another measure should be considered

114. Include a graph that shows the range of people living in deep poverty all the way up to sustainable wealth
115. Data is flawed because many people live with their partners without getting married
116. Age information should be presented in equal intervals
117. There should be charts and graphs that document mental and physical health disabilities juxtaposed with age, race and poverty
118. A map of eviction and foreclosure rates around 1990, between 2008-2013 and now should be included
119. Philadelphia should be identified as a "majority non-white" city, not "majority-minority"
120. Gentrification maps and analysis come from report with a high bar for gentrification; displacement risk ratio includes areas that report misses
121. No explanation of why Promise Zone and Choice Neighborhoods have not alleviated concentration of poverty and race
122. Impediments to mobility for voucher holders must address that many landlords refuse to rent to Section 8 tenants
123. PHA and DHCD must continue to identify, articulate and prioritize goals and strategies that will work to truly expand access to equal and fair housing opportunities to communities affected by persistent segregation and lack of access to housing opportunities due to their race, sex, ethnicity, familial status, national origin, limited English proficiency or disability

Most of the comments made are reflected in this final Assessment of Fair Housing. Those that were not accepted fell into the following categories.

Requests for more analysis. There was insufficient time available to conduct additional analysis of Philadelphia's housing issues. These requests will be considered as Philadelphia begins developing its five-year *Consolidated Plan* in early 2017.

Resource requests or suggestions. The Assessment of Fair Housing is a framework outlining the broad strategies and goals of DHCD and PHA. Resource issues are best addressed in a legislative setting (in the case of requests for more resources) or through the Annual Action Plan (in the case of requests related to resource allocation).

Project-specific or neighborhood-specific requests. Comments regarding the makeup of developments or their locations are best addressed in the Consolidated Plan and in the Annual Action Plans.

Provide specific number of units to be produced. The Assessment of Fair Housing is a framework outlining the broad strategies and goals of DHCD and PHA. Specific number of units to be produced are best addressed in the *Consolidated Plan* and in the Annual Action Plans.

Provision of health care. While access to health care is one of the elements of Affirmatively Furthering Fair Housing, specifics regarding the provision of health care cannot be addressed in the Assessment of Fair Housing.

Opposition to the Affirmatively Furthering Fair Housing rule and the Assessment of Fair Housing. DHCD and PHA are required by statute and regulation to affirmatively further fair housing and to produce the Assessment of Fair Housing.