

# The Sustainable Communities Initiative



## Fair Housing and Equity Assessment Guide series

Lifting Up What Works<sup>®</sup>



Kirwan Institute  
Many Differences **One Destiny**

### The Fair Housing and Equity Assessment

*Developing a Scope of Work to Maximize Equitable Outcomes*

#### ***The Opportunity***

The Fair Housing and Equity Assessment (FHEA) provides an opportunity for diverse stakeholders in a region to develop a shared picture of the housing and infrastructure dynamics that enhance or limit opportunity -- and to develop forward-looking strategies and partnerships that can address some of the region's greatest challenges.<sup>1</sup> Through this '21<sup>st</sup> century orientation to fair housing' -- a candid and broadly shared assessment of residential opportunity -- municipalities and regional entities can identify objectives and priorities for future investments to enhance equity and access to opportunity and address the needs of communities facing the greatest challenges.

What factors will regions have the opportunity to consider by conducting a FHEA? Regional partnerships can examine such things as how the big picture public investments in infrastructure have shaped the development patterns and the opportunities available to communities in their regions; which communities have faced underinvestment of key amenities; or how immigrant communities or people with disabilities can access opportunity. By reviewing how investments (or lack thereof) and land use decisions have contributed to opportunity (or to concentrations of poverty), regions can plan for greater sustainability and prosperity for all.

Unlike previous analyses of impediments to fair housing conducted locally or even regionally, the FHEA and the regional analysis of impediments (RAI)<sup>2</sup> are both regional and local in scope, require

<sup>1</sup> The Sustainable Communities Planning Grant program requires that grantees produce a FHEA as part of their program deliverables. Grantees may take extra steps to transform their FHEA products into RAIs, which offers considerable value as many fair housing issues are best addressed at the regional level.

<sup>2</sup> While many elements of this document may be applicable to grantees working towards a regional analysis of impediments (RAI), this tool focuses on the main components necessary to execute a successful FHEA. Those conducting an RAI should look to HUD for further guidance on specific issues not covered here.

engagement, and consider issues of fair housing in a broader framework. The resulting document can be used as a galvanizing force for communities to challenge existing impediments to fair housing at the local level; for developing partnerships across multiple sectors and issue areas to create a shared understanding of equity and opportunity; and to help local policymakers make informed and targeted decisions about policy and investment to advance fair housing opportunity throughout the region.

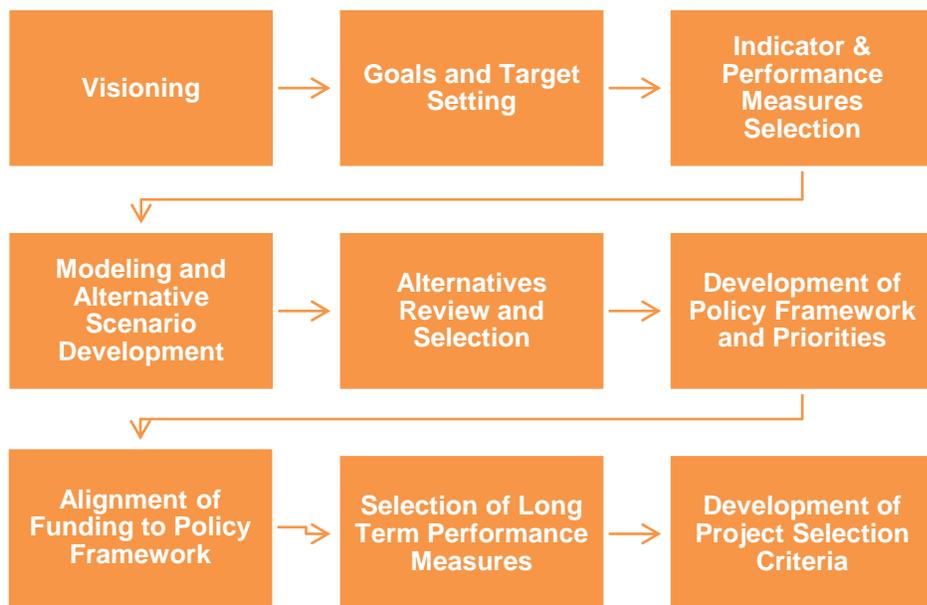
This guide outlines primary issues for consideration by HUD Sustainable Communities Regional Planning grantees as you develop your scope of work. These considerations will help activate a process that can inform future housing and infrastructure investment decisions. In the first part of the document, we outline three critical factors to create and implement a successful FHEA. We then explore in more detail key considerations for the data analysis, the deliberation of findings, and the decision-making necessary to complete the FHEA process<sup>3</sup>. We recommend that you use this guide as a framework and checklist to review with interested parties, and as a filter in drafting RFPs for consultants.

### **Success Factor #1: Alignment of the FHEA/RAI with other local and regional planning processes**

#### *Why is this important?*

Alignment of the FHEA/RAI with planning processes is a critical component towards developing an active document that effectively bridges an analysis of impediments to opportunity to key investment decisions. Taking the time on the front end to identify how this assessment can shape, inform, and influence your regional plan will help you succeed in creating a document that results in actions to achieve positive outcomes for disadvantaged communities. (2010 grantees that have already begun may still find useful strategies in this guide for aligning your FHEA with your broader planning efforts.)

**Figure 1. Key stages of regional planning**



*Aligning the data, deliberation and decision making of the Fair Housing Equity Assessment to inform the key stages of your regional planning will strengthen your plan's equity outcomes.*

*What can I do to improve alignment?*

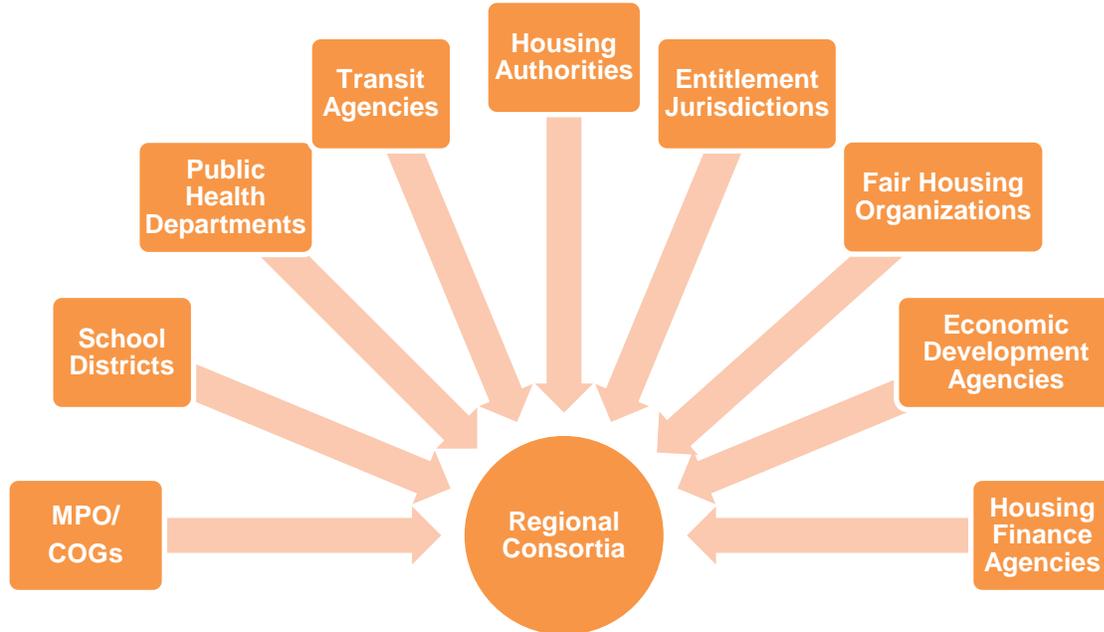
<b>Data</b>	<ul style="list-style-type: none"> <li>• <b>Identify key data driven processes</b> (such as scenario planning, investment criteria, or performance measures development) and use the FHEA to better understand how to reshape goals, indicators, and criteria to improve outcomes for low-income communities and communities of color.</li> <li>• <b>Supplement the HUD-provided data with additional data</b> as necessary to help bridge to other processes related to social, environmental, and economic components of opportunity (i.e. data on minority business contracting for an economic development plan; local inclusionary housing production data to supplement HUD provided federal housing subsidy data for a housing-transportation plan).</li> </ul>
<b>Deliberation</b>	<ul style="list-style-type: none"> <li>• <b>Hold information sessions with stakeholders</b> across multiple jurisdictions, sectors, and issue areas on the FHEA to develop a shared understanding of local conditions, of the opportunity for planning, and to identify connections to the FHEA.</li> <li>• <b>Cast a wide net of potential agency stakeholders</b> in the process, while focusing on those that have significant influence over public resources and investments. This could be several types of organizations, including (but not limited to): housing authorities, metropolitan planning organizations, councils of government, transit agencies, planning/community development departments, housing finance agencies, public health departments, economic development agencies, or budget departments.</li> <li>• <b>Identify key decision-points</b> in planning and investment allocation processes.</li> <li>• <b>Build in enough time for deliberation</b> of FHEA findings prior to these decisions.</li> <li>• <b>Get creative</b> in how the FHEA can start local and regional conversations about equity!</li> </ul>
<b>Decision Making</b>	<ul style="list-style-type: none"> <li>• <b>Identify boards, commissions, and councils</b> that will need to be brought up to speed on the FHEA – and what equity and access to opportunity mean in your region.</li> <li>• <b>Align strategies with multiple jurisdictions and agencies</b> to achieve more comprehensive impact in reducing impediments and fostering investments.</li> </ul>

*Who is important to be involved in this process?*

Because aligning the FHEA across the region will require the coordination of a large number of stakeholders, this process should be managed and facilitated by a person or organization with broad standing in the region, trust amongst public agencies and the advocacy community, institutional knowledge of regional trends and actors, and demonstrated experience reaching and working with communities of color and the disability community. This could include universities (schools of city urban planning and policy, etc.), regional housing agencies, equitable development intermediaries, community development consulting firms, etc. The benefits of including a university include developing ongoing continuity for updating and monitoring of your progress on performance measures beyond the grant period.

While many of these organizations and institutions will be drawn from your consortium, new participants that have a stake in equity and regional opportunity outcomes can be drawn into this aspect of Sustainable Communities planning. This may include state agencies, civil rights organizations, municipalities not included in the original consortia, or other issue-focused organizations related to health, transportation, housing, education, or economic opportunity in the region.

**Figure 2. Key Leadership to Engage in Fair Housing Equity Assessments**



*Diverse stakeholders can bring their key resources to the Fair Housing Equity Assessment, and take responsibility for implementing the resulting priorities, policies, and projects.*

***FY10 Grantees and Alignment: Maintaining Relevance for the FHEA***

We recognize that many FY10 grantees have begun work on their FHEA or RAI and that many have approved scopes of work. In addition, FY10 grantees are well into their regional planning processes, and the potential for the FHEA to inform or influence the planning process may appear uncertain. Despite these challenges, there are a few suggestions we have to stay creative as you think of ways the FHEA can influence planning and investments and improve regional conversations around equity and opportunity:

- As you scan for decision points and processes that the FHEA can inform, be thinking about activities outside of the grant as well (e.g., school quality investment plans; economic development plans, etc).
- Use the FHEA to launch an informed regional conversation about equity and opportunity (e.g., ‘What success factors and investments would matter most to these communities?’).
- If particular equity issues surfaced in previous community engagement processes, use the FHEA to further develop an understanding of the issue and a plan for resolution (potential issues that may arise in planning processes that can be addressed by FHEA: gentrification, displacement of residents and businesses, lack of resources for implementation to address needs of low-income communities and communities of color, etc).
- Stay open to listening to new voices and expand the decision-making table to be as inclusive as possible.

**Success Factor #2: Robust Community Engagement to Better Address Local Equity Concerns**

*Why is this important?*

There are many reasons why a strong community engagement process will help develop a strong FHEA. In order to develop a more accurate and nuanced picture of equity and opportunity in your region, it is critical to engage those who live in the reality of disconnected neighborhoods as well as the organizations that represent these places -- most often low-income communities and communities of color -- and these constituencies, such as people with disabilities, seniors, single parent families, etc. These communities and constituencies can help provide leadership, capacity, and legitimacy to efforts to advance equitable policy and investments in the region. A community engagement strategy for the FHEA should take a multi-pronged approach. If you've already started your community engagement process, that's okay. Wherever engagement can overlap with previously planned activities for the planning process, incorporate a conversation about disparities and access to opportunity in that space. Have these conversations as early as possible, even before the scope of work for your FHEA is complete. Asking basic questions about what people in low-income communities and communities of color like and don't like about their neighborhood, their commute, or their economic opportunities; and what service and infrastructure deficits exist will be incredibly valuable information to guide the focus of the FHEA.

*How can we incorporate our community engagement strategy into the FHEA process?*

<b>Data</b>	<ul style="list-style-type: none"> <li>• <b>Use broad community engagement</b> and public participation exercises (similar to what might happen in a visioning or listening session) <b>to help develop priority areas for FHEA exploration</b> (i.e. gentrification, transit access, foreclosures, etc.).</li> <li>• <b>Conduct focus groups with key constituencies and/or protected classes</b> for the FHEA to get a better understanding of equity concerns in the region—this will be critical to inform the development of goals, priorities, indicators, and performance measures for various stages of the planning process.</li> <li>• <b>Draw from recent studies</b> focused on the issues of disconnected neighborhoods or persistent and concentrated poverty.</li> </ul>
<b>Deliberation</b>	<ul style="list-style-type: none"> <li>• <b>Design listening and information sessions with the help of organizations</b> that work with low-income communities and communities of color to talk about what the FHEA is and to communicate the findings of the FHEA.</li> <li>• Work with your FHEA working group and SCI consortium to <b>develop a coherent narrative for the findings</b> and communications strategy.</li> <li>• <b>Select skilled facilitators</b> who are experienced in the subject area and have established relationships and trust with a diversity of stakeholders and community representatives.</li> </ul>
<b>Decision Making</b>	<ul style="list-style-type: none"> <li>• <b>Vest decision-making power with the FHEA working group</b> or its equivalent while creating clear and consistent feedback mechanisms between the working group <b>and key decision-making bodies in the SCI consortium structure.</b></li> <li>• Work closely with organizations representing marginalized communities and policymakers to develop solutions to identified barriers to opportunity.</li> <li>• <b>Be explicit with decision-makers about how the FHEA can inform their policy and investment decisions.</b></li> <li>• <b>Identify leaders who can champion the FHEA</b> in your region.</li> </ul>

**Success Factor #3: Build Local Capacity and Foster Partnerships to Address Barriers to Opportunity**

*Why is this important?*

Ultimately, the advancement of equitable outcomes requires a significant level of collaboration amongst local and regional actors. In this new ‘21<sup>st</sup> century framework for fair housing’, agencies and organizations across sectors and issue areas need to collectively understand and share responsibility to advance opportunity for marginalized communities. Reversing the legacy of segregation and disinvestment in regions across the country requires a coordinated and concerted effort. Crucial to these successful partnerships and collaboration is a process that encourages active and meaningful engagement and participation. While it will require substantial capacity to develop a broad understanding of fair housing, this effort will inform funding decisions, policy change, and implementation of future infrastructure projects. This orientation to fair housing will be new to both community organizations and regional bodies—and thus, capacity building should be inclusive of these groups while supporting the development of regional partnerships.

*How can our FHEA process build local capacity and foster partnerships?*

<b>Data</b>	<ul style="list-style-type: none"> <li>• <b>Work with local institutions to conduct data analysis</b> wherever possible: this could include universities, research and policy organizations, fair housing centers, civil rights organizations, etc.</li> <li>• Present data in accessible formats.</li> </ul>
<b>Deliberation</b>	<ul style="list-style-type: none"> <li>• <b>Engage diverse stakeholders early and often</b> (both inside and outside of consortium) to develop a shared understanding of factors contributing to concentrated and racialized poverty.</li> <li>• <b>Work with experienced local facilitators</b> that have a deep understanding of regional issues and established trust with stakeholders across sectors and issue areas.</li> </ul>
<b>Decision Making</b>	<ul style="list-style-type: none"> <li>• <b>Focus on key decision points</b> (e.g., scenario plan adoption, housing plan completion, transportation alignment adoption, complete streets plans, transportation route and schedule plan adoptions, priority development area selection, housing subsidy criteria adoption, etc.) while minding other processes outside of the grant that the FHEA can connect and inform (e.g., workforce development plans, school capital improvement plans, etc.).</li> <li>• <b>Provide opportunities for decision-makers to interact with each other</b> and provide workshops and trainings if necessary to increase their awareness around equity issues in their jurisdiction.</li> </ul>

## ***Additional Data Considerations***

### *What data and indicators should I include in the FHEA?*

The data that HUD provides is an excellent start and critical for completion of several chapters of the FHEA. However, as HUD has mentioned in their webinars and guidance, the data they provide will not depict a complete picture of the geography of opportunity for your region. Looking at trends over time is key; and selecting additional indicators that reflect: 1) concerns that surface in community engagement processes; and, 2) the activities that the FHEA will be informing. While the HUD-provided data is a great start, you may need more information regarding health, economic opportunity, or public investments.

### *What should be the geography of focus for the analysis?*

Generally speaking, this will likely differ depending on the indicator and its purpose. Some of the indicators that HUD provides will be at the regional or county level, and some will be at the city or even census tract level. As much as possible, data should be analyzed for the entire grant geography. When it makes sense to focus on a smaller geography due to the nature of the project (i.e. transit corridors; labor markets; specific neighborhoods or jurisdictions) then utilize data that best meets that specific geographical need.

### *Who should conduct the data analysis?*

This will in part depend on the scope of data to be analyzed, the purpose of the data, and local capacity. As we've mentioned before, the FHEA is a great opportunity to build on local capacity to understand and analyze regional and local factors related to equity. Universities tend to have high capacity research staff, a supply of interns and research assistants, and good standing and respect in the community by multiple partners. If you work with a planning or policy school, they may have capacity for both quantitative and qualitative data analysis. Some equitable development or regional affordable housing associations or legal services also have significant data and convening capacity.

Not all of the data needs to be analyzed by one organization, consultant, or partner. For analysis of previous plans, policies, and investments, some advocacy organizations, legal firms, or research institutions may be able to support this work as well. Fair housing centers will play a critical role in supporting the analysis of the fair housing infrastructure chapter. It is important to conduct a scan of organizational capacity early in the process to identify potential partners in this effort. Consulting firms may be able to fill in gaps as necessary. Any entity you choose to work with should have demonstrated experience in working with data that analyzes racial, economic, and nativity disparities, and in working through consultative processes with diverse stakeholders.

## ***Additional Deliberation Considerations***

### *What are some important next steps for a FHEA exploratory committee?*

Once you have a good advisory committee or working group in place, we have a few suggested next steps to make your deliberation process a smooth one:

- Develop a timeline with key grant activities and engagement processes in mind;
- Inventory key stakeholders, neighborhoods, and jurisdictions to contact;
- Identify key focus areas for assessment in FHEA;

- Brainstorm key agencies that might provide leadership for convening, data analysis, facilitation, and engagement;
- Craft an RFP that can procure the capacities of these agencies;
- Develop a budget that is supportive of the breadth of tasks ahead; and
- Develop a communications plan – both internal and external – that establishes roles for sharing information, coordinating stakeholders, and shaping spaces for open, inclusive, and robust discussion of FHEA findings.

*What kinds of “deliberation” tasks can be started right away?*

Since the deliberation phase focuses largely on deliberate conversations amongst consortia and non-consortia stakeholders regarding the FHEA findings, it’s wise to start thinking about how these groups can be prepared to have effective dialogue about these topics. In the Boston region, the fair housing and affordable housing caucuses developed trainings on fair housing and equity to share with other working groups and consortia partners. In the Twin Cities, various governmental and advocacy organizations have held events to start a regional conversation about equity and the future of the region, using demographic change data as a starting point. It’s important to develop common definitions of equity and a shared understanding of fair housing and civil rights history locally to inform the FHEA. The FHEA will ultimately be a critical process and document that can identify specific obstacles to regional prosperity and success for all -- and guide your regions in charting a more inclusive and prosperous future.

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**Forthcoming Resources, Fall 2012**

The PolicyLink and Kirwan Institute Capacity Building team will release additional guides in the fall of 2012 that include:

- The Roles of Institutional Players in Advancing Regional Fair Housing*
- Key Indicators to Inform a Robust Fair Housing Equity Assessment*

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**For capacity support in developing your FHEA, contact:**

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*Veronica can refer you to appropriate resources at PolicyLink, the Kirwan Institute, or the Minnesota Housing Partnership (working with rural and tribal grantees).*