OAKLAND COUNTY MICHIGAN
COMMUNITY & HOME IMPROVEMENT

Analysis of Impediments to **Fair Housing Choice**

2020 *FINAL EXECUTIVE SUMMARY*

PREPARED BY:
Western Economic Services, LLC
212 SE 18th Ave. | Portland, OR
(503) 239-9091 | WesternES.com

WESTERN ECONOMIC SERVICES, LLC

EQUAL HOUSING OPPORTUNITY

MESSAGE FROM

DAVID COULTER

OAKLAND COUNTY EXECUTIVE

Dear Oakland County Resident,

I am committed to ensuring that our county government is doing everything it can to foster an environment of inclusion, diversity and equity and to ensure that Oakland County residents have access to housing of their choice. The current data is unacceptable; we can and must do better.

The information contained in the following Analysis of Impediments to Fair Housing Choice (AI) will be used to create Oakland County's Fair Housing Plan which will seek to ameliorate or eliminate both private and public sector impediments. I appreciate your participation in making this a reality.

Provisions to affirmatively further fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD's) housing and community development programs. HUD requires Oakland County to prepare an AI as part of our consolidated planning process every 5 years. The AI is an assessment of laws, ordinances, statutes, and administrative policies as well as local conditions that affect the location, availability, and access to housing.

As we take the long-term steps to update our consolidated five-year plan as required by the U.S Department of Housing and Urban Development (HUD), I also want to explore short- and medium-term enhancements to our current programs.

Housing is much more than just a roof over our heads; it is a platform for many aspects of living. If someone is denied housing choice, they are also denied access to the advantages and opportunities that housing stability provides.

I look forward to working with you to achieve our mutual goals of affordable housing and equal opportunity for all residents in all parts of our county.

OAKLAND COUNTY, MICHIGAN

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Prepared for:
Oakland County
Community & Home Improvement Division
Oakland Pointe, Suite 1900
250 Elizabeth Lake Road
Pontiac, MI 48341
https://www.oakgov.com/advantageoakland/communities/Pages/Publications.aspx
Phone: (248) 858-0493
Toll Free: (888) 350-0900 ext. 80493
Fax: (248) 858-5311

Prepared by:
Western Economic Services, LLC
212 SE 18th Avenue
Portland, OR 97214
http://www.westernes.com
Phone: (503) 239-9091
Toll Free: (866) 937-9437
Fax: (503) 239-0236

Effective Date July 1, 2021

Has Your Right to Fair Housing Been Violated?

If you feel you have experienced discrimination in the housing industry, please contact:

U.S. Department of Housing and Urban Development
Office of Fair Housing & Equal Opportunity (FHEO)
477 Michigan Avenue, Room 1710
Detroit, Michigan 48226-2592
Phone: (313) 234-7352
TDD/TTY (313) 226-7822
Fax: (313) 226-3887
FHEO Housing Discrimination Hotline: 800-669-9777

U.S. Department of Housing and Urban Development
Form 903 Online Complaint in English:
https://portalapps.hud.gov/FHEO903/Form903/Form903Start.action

HUD Formulario 903 quejas en línea:
https://portalapps.hud.gov/AdaptivePages/HUD_Spanish/Espanol/complaint/complaint-details.htm

Michigan Department of Civil Rights
Phone: 1-800-482-3604
TDD/TTY Users: 1-877-878-8464
www.michigan.gov/mdcr

Fair Housing Center of Metropolitan Detroit
220 Bagley St., Suite1020
Detroit, MI 48226
Phone: (313) 963-1274
https://fairhousingdetroit.org

Oakland County Community & Home Improvement Division
Housing Counseling
Oakland Pointe, Suite 1900
250 Elizabeth Lake Road
Pontiac, Michigan 48341-0414
Phone: (248) 858-1891

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Section I. Executive Summary

Overview

Title VIII of the 1968 Civil Rights Act, also known as the Fair Housing Act, protects people from discrimination based on race, color, national origin, religion, sex, familial status, and disability when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing related activities. The Fair Housing Act, and subsequent laws reaffirming its principles, seeks to overcome the legacy of segregation, unequal treatment, and historic lack of access to housing opportunity. There are several statutes, regulations, and executive orders that apply to fair housing, including the Fair Housing Act, the Housing Amendments Act, and the Americans with Disabilities Act.[1]

Affirmatively furthering fair housing is defined in the Fair Housing Act as taking "meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics".[2] Specifically, affirmatively furthering fair housing requires that recipients of federal housing and urban development funds take meaningful actions to address housing disparities, including replacing segregated living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.[3] Furthering fair housing can involve developing affordable housing, removing barriers to affordable housing development, investing in neighborhood revitalization, preserving and rehabilitating existing affordable housing units, improving housing access in areas of concentrated poverty, and improving community assets.

Assessing Fair Housing

Provisions to affirmatively further fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD's) housing and community development programs. These provisions come from Section 808(e)(5) of the Fair Housing Act, which requires that the Secretary of HUD administer federal housing and urban development programs in a manner that affirmatively furthers fair housing.[4]

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle. As part of the planning process, entitlement communities that receive such funds from HUD are required to submit HUD certification annually that they are affirmatively furthering fair housing. In addition, an Analysis of Impediments to Fair Housing Choice (AI) is required every 3-5 years.

In July of 2015, HUD released a new Affirmatively Furthering Fair Housing (AFFH) rule which provided a format, a review process, and content requirements for the newly named "Assessment of Fair

[1] https://www.hud.gov/program_offices/fair_housing_equal_opp/fair_housing_and_related_law
[2] § 5.152 Affirmatively Furthering Fair Housing
[3] § 5.152 Affirmatively Furthering Fair Housing
[4] 42 U.S.C.3601 et seq.

Housing", or AFH.[5] The assessment would now include an evaluation of equity, the distribution of community assets, and access to opportunity within the community, particularly as it relates to concentrations of poverty among minority racial and ethnic populations. Areas of opportunity are physical places within communities that provide things one needs to thrive, including quality employment, high performing schools, affordable housing, efficient public transportation, safe streets, essential services, adequate parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes.

The AFH includes measures of segregation and integration, while also providing some historical context about how such concentrations became part of the community's legacy. Together, these considerations were intended to better inform public investment decisions that would lead to amelioration or elimination of segregation, enhance access to opportunity, promote equity, and hence, housing choice. Equitable development requires thinking about equity impacts at the front end, prior to the investment occurring. That thinking involves analysis of economic, demographic, and market data to evaluate current issues for citizens who may have previously been marginalized from the community planning process. All this would be completed by using HUD's online Fair Housing Assessment Tool.

However, on January 5, 2018, HUD issued a notice that extended the deadline for submission of an AFH by local government consolidated plan program participants to their next AFH submission date that falls after October 31, 2020.[6] Then, on May 18, 2018, HUD released three notices regarding the AFFH; one eliminated the January 5, 2018, guidance; a second withdrew the on-line Assessment Tool for local government program participants; and, the third noted that the AFFH certification remains in place. HUD went on to say that the AFFH databases and the AFFH Assessment Tool guide would remain available for the AI; and encouraged jurisdictions to use them.

Hence, the AI process involves a thorough examination of a variety of sources related to housing, the fair housing delivery system, housing transactions, locations of public housing authorities, areas having racial and ethnic concentrations of poverty and access to opportunity. The development of an AI also includes public input, public meetings to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and impediments, along with actions to overcome the identified fair housing issues and impediments.

In accordance with the applicable statutes and regulations governing the Consolidated Plan, Oakland County certifies that they will affirmatively further fair housing, by taking appropriate actions to overcome the effects of any impediments identified in the Analysis of Impediments to Fair Housing Choice and maintain records that reflect the analysis and actions taken in this regard.

Limitations to the Affirmatively Furthering Fair Housing (AFFH) dataset

The AI was completed using the AFFH framework as suggested by HUD. However, the current AFFH dataset as released by HUD contains several data concepts that are dated or could be considered misleading to the general population. This document used the raw AFFH version AFFH0004a, which was released in February of 2018 and revised in March 2019. Although this data was released in 2018, it relies heavily on the 2009-2013 5-year American Community Survey (ACS) dataset as well as the 2009-

[5] 80 FR 42271. https://www.federalregister.gov/documents/2015/07/16/2015-17032/affirmatively-furthering-fair-housing
[6] 83 FR 683 (January 5, 2018)

2013 Comprehensive Housing Affordability Strategy (CHAS) data. This period was the height of the great recession and describes a starkly different economic and demographic landscape than the post-recession recovery in which we find ourselves today. Wherever possible this report used the 2013-2017 ACS data to describe AFFH data concepts, such as the Limited English Proficiency (LEP) or the Dissimilarity Index. Also included is the most recent 2012-2016 CHAS data to address housing affordability. As a result, this document attempts to update the AFFH data concepts to the most accurate data available.

One area which relied on the AFFH data provided in the 2018 February release, were seven opportunity indices. All data, except the dissimilarity index, came directly from the AFFH dataset. It was expressed several times throughout the public input process that these indices are confusing to the general public and misleading in the concepts they try to measure. For example, the environmental health index only measures outside air quality and does not address potential in home toxins, such as lead paint or lead water pipes, which is what the majority of the public assumed was being measured. The education index only evaluates 4th grade test scores, which does not capture any sort of complete educational quality. Many of the public thought it measured high school graduation rates, or broader measures of educational qualities, such as quality of teachers or school district ratings. The very idea of "Access to Opportunity" and what these indices were trying to measure was also discussed at length. The AFFH data documentation says these indices are attempting to measure quality of life factors, and disparities to accessing these factors based on race and ethnicity. While this is an important concept to measure, it was generally expressed that limitations on the measurements were too restrictive to accurately describe the concept of opportunity. However, as recommended by HUD the complete set of indices is provided in this document.

Affordability and Fair Housing

Housing affordability is an important and complicated issue. In a free market society, the market maximizes profits, which does not necessarily maximize housing production. As the demand for housing rises and if the supply does not keep pace, prices increase. Rising prices may cause households to spend more of their income on housing. Severely cost burdened households are in an especially precarious financial situation, perhaps being only a few missed paychecks away from experiencing homelessness. Homelessness and the various issues surrounding homelessness is directly related to housing affordability. While these issues are pressing and important and were discussed at public forums throughout the county, how housing affordability relates to fair housing is less straightforward. Source of Income is not a federally protected class, nor is it in the State of Michigan. The level of income households have is also not directly a fair housing issue; however, many protected classes may have differing levels of income when compared to non-protected classes. For example, a single parent household with two children may have lower income levels than two parent households. Single parent households may face housing discrimination based on Familial or Marital Status, which is a fair housing issue. However, is the root of discrimination due to bias against a single parent, children in the housing unit, or the worry that perceived lower earning levels may cause missed rental payments? This is a complicated issue and no dataset can fully evaluate the underlying causes of discrimination. The CHAS data is included in this document because it shows housing problems by some protected classes. If certain protected classes have higher instances of housing problems, it is not necessarily a fair housing issue. However, there may be some correlation between levels of income and protected class status, which may influence the prevalence of housing discrimination.

Housing Choice Voucher (HCV) payment standard and tenant based rental assistance program maximum rental rates are tied to the HUD Fair Market Rent (FMR) for the Detroit-Warren-Livonia

Metropolitan Statistical Area (MSA). The MSA includes Lapeer, Macomb, Oakland, St. Clair and Wayne Counties. The average rental rate is higher in Oakland County than in the other MSA counties. Housing Choice Voucher (HCV) holders and renters with tenant based rental assistance using the Fair Market Rent (FMR) may seek affordable housing in various locations throughout Oakland County. Many units meeting the fair market standards are in Pontiac which is home to Oakland County's only Racially Concentrated Areas of Poverty (RCAP)/Ethnically Concentrated Areas of Poverty (ECAP) areas. Areas with large numbers of lower cost rental housing units serve as a contributing factor in creating RCAP/ECAP areas. To address this issue Oakland County's Continuum of Care has requested an FMR exception rent from HUD. If granted, the exception would create a higher FMR rent threshold. This would create greater housing options in more communities across Oakland County.

Oakland County Celebrates Diversity

The Oakland County Executive proudly supports diversity and inclusiveness. In response to Executive Order 13888 which asks local communities to identify their preference and ability to accept refugees, Oakland County strongly supports the integration of refugees into the American society and the labor force. The County Executive emphasized the direct economic and social impact refugees create in a community. Oakland County has accepted the highest percentage of refugees in southeast Michigan from 2007 through 2016. Oakland County has a proven track record of integrating refugees into the workforce through Oakland County Michigan Works!. This program helps refugees acquire skills and training to enter the workforce and become productive members of society. In addition, the Refugee and Immigrant Navigator (RAIN) program serves about 300 newly arrived, work-authorized individuals a year, assists them in finding English language classes, and receiving training for current or new skill sets.

Oakland County also approved local resolution #19250, which specifically declares as an official position that Oakland County depends on diversity and the talents of all who live and work in Oakland County. The success and diversity of the County's residents and business is vital to the County's growth and quality of life. The County is committed to providing equal opportunity to all including historically underrepresented individuals.

Michigan: Home Rule State

The State of Michigan is a home rule state, which gives Cities, Townships, and Villages authority to adopt and amend their own charters for the purpose of exercising municipal powers and managing their own affairs to adopt laws and ordinances related to their particular municipality's needs. As a result of Home Rule, Oakland County is precluded from creating ordinances or laws governing local jurisdictions. This makes establishing standardized countywide ordinances difficult, since each individual jurisdiction has "home rule" over itself. It is therefore even more important that Oakland County has adopted a resolution to be a model of equal opportunity. Oakland County's effort to lead by example is the most effective way to encourage individual jurisdictions to promote diversity and inclusiveness in a home rule State.

Overview of Findings

As a result of detailed demographic, economic, and housing analysis, along with a range of activities designed to foster public involvement and feedback, Oakland County has identified a series of fair housing issues/impediments, and other factors that may contribute to the creation or persistence of those issues.

Definitions

Fair Housing Choice – HUD's definition of "fair housing choice" means the ability of persons, regardless of race, color, religion, sex, handicap, familial status, or national origin, of similar income levels to have available to them the same housing choices.

Fair Housing Issue – HUD defines a fair housing issue as a condition in a program participant's geographic area of analysis that restricts fair housing choice or access to opportunity, and includes such conditions as ongoing local or regional segregation or lack of integration, racially ethnically concentrated areas of poverty, significant disparities in access to opportunity, disproportionate housing needs, and evidence of discrimination or violations of civil rights law or regulations related to housing.[7]

Contributing Factors – Is a factor that creates, contributes to, perpetuates, or increases the severity of one or more fair housing issues.

Segregation – For the purposes of this study segregation is defined using the Dissimilarity Index in Section IV.B. This dissimilarity index calculates how evenly two demographic groups are distributed throughout an area.

Racially or Ethnically Concentrated Areas of Poverty – Racially or ethnically concentrated areas of poverty (R/ECAPs) are Census tracts with relatively high concentrations of non-white residents living in poverty. This is calculated at a rate of at least 50 percent non-white population and at least 40 percent poverty rate. This is discussed in more detail in Section IV.C.

Opportunity Indices – Opportunity Index ratings are defined by calculations shown in Section IV.D. Areas of opportunity are physical places, areas within communities that provide things one needs to thrive, including quality employment, well performing schools, affordable housing, efficient public transportation, safe streets, essential services, adequate parks, and full-service grocery stores. Disparities in access to opportunity inspects whether a select group, or certain groups, have lower or higher levels of access to these community assets. These indices include low poverty, school proficiency, job proximity, labor market engagement, transportation trips, low transportation cost, and environmental health.

> *Low Poverty Index* – A measure of family poverty by household (based on the federal poverty line) to measure exposure to poverty by neighborhood.
>
> *School Proficiency Index* – School-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing schools.
>
> *Labor Market Engagement Index* – Provides a measure of unemployment rate, labor-force participation rate, and percent of the population ages 25 and above with at least a bachelor's degree

Housing Problems – Housing problems are defined by HUD to mean overcrowding, incomplete kitchen facilities, incomplete plumbing facilities, or cost burdens (paying more than 30 percent of household income on housing costs, severe cost burden is defined as gross housing costs that exceed 50.0 percent of gross household income).

[7] https://files.hudexchange.info/resources/documents/AFFH-Rule-Guidebook.pdf

Table I.1 provides a list of the factors that have been identified as contributing to fair housing issues/impediments and prioritizes them according to the following criteria:

1. High: Factors that have a direct and substantial impact on fair housing choice
2. Medium: Factors that have a less direct impact on fair housing choice, or that Oakland County has limited authority to mandate change.
3. Low: Factors that have a slight or largely indirect impact on fair housing choice, or that Oakland County has limited capacity to address.

Table I.1
Contributing Factors
Oakland County

Contributing Factors	Priority	Justification
Patterns in lending	High	As demonstrated by 2008-2017 Housing Mortgage Disclosure Act (HMDA) data Black/African American and Hispanic households have a higher mortgage denial rate than white households. The average denial rate over the entire period was 12.7 percent for white households; however, the average denial rate was 29.3 percent for Black/African American households as seen in Table IV.64.
Access to low poverty areas	Low	Low poverty index is markedly lower for Black/African American and Hispanic populations than white index levels, indicating inequitable access to low poverty areas, as seen in Diagram IV.11.
Access to school proficiency	Low	School proficiency index ratings are lower for Black/African American and Hispanic households in the County, as seen in Diagram IV.11. However, the County has little control over this on a large scale.
Access to labor market engagement	Low	Black/African American and Hispanic households have less access to labor market engagement as indicated by the Access to Opportunity Index in Diagram IV.11. However, the County has little control over impacting labor market engagement on a large scale.
Moderate to high levels of segregation	High	Black/African American, Asian, and "other" race households have moderate to high levels of segregation, as shown in Diagram IV.10. In addition, other racial groups have high levels of segregation, but represent a much smaller proportion of the population. These include Native Hawaiian and American Indian households, which account for less than one percent of the population. This is shown in the Dissimilarity Index in Section IV.B.
Insufficient affordable housing in a range of unit sizes	High	Some 26.7 percent of households have cost burdens. This is more significant for renter households, of which 41.4 percent of renter households have cost burdens, according to American Community Survey (ACS) data in Table IV.48. This signifies a lack of housing options that are affordable to a large proportion of the population.
Racial minority households have disproportionate rates of housing problems	High	An estimated 95,345 white households, 28,960 Black/African American households, 6,090 Asian households, 350 American Indian, 30 Pacific Islander, and 2,915 "other" race households face housing problems in Oakland County, as shown in Tables IV.45 - IV.47. Black/African American households face housing problems at a rate of 41.3 percent, compared to the jurisdiction average of 27.8 percent, and white households at 25.4 percent, according to Comprehensive Housing Affordability Strategy (CHAS) data, as shown in Table IV.50.
Insufficient accessible affordable housing	High	The number of accessible affordable units may not meet the need of the growing elderly and disabled population, particularly as the population continues to age. Some 48.5 percent of persons aged 75 and older have at least one form of disability, as shown in Table IV.73.
Discrimination on the basis of disability	High	The most common housing complaint with cause was on the basis of a disability, accounting for 69 complaints between 2008 and 2019, according to HUD Fair Housing complaint data, shown on Table IV.82.
Location of public housing units tend to have lower levels of access to opportunity	Med	The location of publicly supported housing units tends to be in areas with lower levels of access to low poverty areas and labor market engagement, as discussed on page 69.
Concentration of publicly supported housing units	Low	Publicly supported housing units are concentrated in certain areas, according to HUD AFFH database on page 106 in Map IV.24. This is also true of Housing Choice Vouchers and is shown in the maps on pages 105 to 108. However, the County has no control over the location and use of Housing Choice Vouchers and location of public housing units.
Barriers in housing code and zoning	High	The Land Use Planner Survey found that many jurisdictions in the County define the word family as related by blood, marriage, or adoption" or "related" in any other traditional sense, which may limit access to housing choice. In addition, few jurisdictions actively encourage affordable housing development or inclusionary policies. Planner survey results are found in Section VI. E Land Use Planner Survey on page 296.
Need for fair housing education	High	The fair housing survey and public input indicated a lack of knowledge about fair housing and a need for education. Survey results are found in Section IV.I. Fair Housing Results.
Need for understanding of credit	High	The fair housing survey and public input indicated an insufficient understanding of credit needed to access mortgages. Survey results are found in Section IV.I.

FAIR HOUSING ISSUES, CONTRIBUTING FACTORS, AND PROPOSED ACHIEVEMENTS

Table I.2 summarizes the fair housing issues/impediments and contributing factors, including metrics (to track progress), milestones (to set deadlines, tasks, and budgets), and a timeframe for achievements.

Table I.2
Fair Housing Issues/Impediments, Contributing Factors, and Recommended Actions
Oakland County

Fair Housing Issues/ Impediments	Contributing Factors	Recommended Actions
Segregation	Moderate to high levels of segregation Barriers in housing code and zoning Patterns in lending	• Educate local jurisdictions over the next five years on zoning, land use policies and regulations that can reduce barriers to fair housing • Reduce the incidence of predatory lending and discrimination by educating potential homebuyers through Oakland County Housing Counseling
Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs)	Racial minority households have disproportionate rates of housing problems Moderate to high levels of segregation	• Decrease housing problems in the City of Pontiac R/ECAP areas by promoting Oakland County Home Improvement Program (HIP) and housing counseling services • Expand housing choice outside of R/ECAP areas by evaluating the location of future federal investment in affordable housing developments

Disparities in Access to Opportunity	Access to low poverty areas
	Access to labor market engagement
	Access to proficient schools
		• Invest CDBG, HOME and ESG funds for up to 1,500 units over five (5) years to:
		  • Increase the supply of affordable rental housing
		  • Rehabilitate affordable rental and owner housing
		  • Provide financial assistance to promote affordable homeownership
		• Promote homeownership opportunities in high labor market engagement areas with financial assistance to homebuyers using CDBG and HOME funds
		• Explore opportunities annually for redevelopment or rehabilitation of residential properties
		• Educate CDBG participating communities on options to fund transportation services to link housing to jobs and services

Disproportionate Housing Need	Insufficient affordable housing in a range of unit sizes Barriers in housing code and zoning Racial minority households have disproportionate rates of housing problems	• Use Oakland County general funds to add one full time Housing Specialist to assist in the development of affordable housing • Ensure a minimum standard of housing quality by educating local jurisdictions on rental housing policy best practices (rental registration, inspection, and certification ordinance/regulation) • Reduce barriers to fair housing choice by educating local jurisdictions on zoning, land use policies, regulations and the need for range of unit sizes in affordable housing • Maximize knowledge of available affordable housing options for low income residents through housing counseling education and referrals • Promote affordable housing development in a range of unit sizes through collaboration with local jurisdictions and developers

Table I.2 continued
Fair Housing Issues/Impediments, Contributing Factors, and Recommended Actions
Oakland County

Fair Housing Issues/ Impediments	Contributing Factors	Recommended Actions
Publicly Supported Housing	Location of public housing units tend to have lower levels of access to opportunity	• Provide letters of support to publicly supported housing developers to encourage development in non-R/ECAP areas to disburse concentrations of poverty
Disability and Access	Insufficient accessible affordable housing Discrimination on the basis of disability	• Work with jurisdictions in the County to review development standards for accessible housing and inclusionary policies for accessible housing units; continue recommending appropriate amendments each year, over the next five (5) years • Promote HIP to seniors and adults with disabilities to assist homeowners to improve access and age in place • Educate landlords and developers on reasonable access/modification
Outreach and Education	Need for fair housing education Need for understanding of credit Patterns in lending Discrimination on the basis of disability	• Reduce the incidence of predatory lending and discrimination by educating potential homebuyers through Oakland County Housing Counseling • Offer bi-annual fair housing workshops for local real estate and community agencies • Provide local jurisdictions with fair housing information to improve and make more uniform fair housing information on their websites • Continue to provide fair housing outreach and education materials on the County's website. Promote distribution of materials at local service providers. Review locations on an annual basis • Educate landlords on fair housing and reasonable access/modification • Contribute funds to the Fair Housing Center of Metropolitan Detroit to assure equal access to housing without discrimination • Engage the Chief Diversity, Equity and Inclusion Officer (CDEIO) to host an annual fair housing summit. The purpose of this event is to raise awareness of fair housing issues • Develop and deliver community best practice workshops around the concept of affordable housing and its cultural and economic value • Provide fair housing resource materials in non-English languages, including Spanish

Oakland County may undertake actions over the course of the next five (5) years as shown in Table I.2. The actions taken should be tracked by the County's Five-Year Consolidated Plan and monitored in the Consolidated Annual Performance and Evaluation Report (CAPER). These actions are further outlined below in Table I.3.

Table I.3
Action, Measurable Outcome, and Timeline
Oakland County

Action	Measurable Outcome	Timeline
• Educate local jurisdictions over the next five years on zoning, land use policies and regulations that can reduce barriers to fair housing	Number of outreach and education activities	Annually
• Expand housing choice outside of R/ECAP areas by evaluating the location of future federal investment in affordable housing developments • Use Oakland County general funds to add one full time Housing Specialist to assist in the development of affordable housing	Identify new investments in non-R/ECAP areas	Review locations after five (5) years
• Decrease housing problems in the City of Pontiac R/ECAP areas by promoting Oakland County Home Improvement Program (HIP) and housing counseling services	Number of outreach and education activities	Annually
• Provide letters of support to publicly supported housing developers to encourage development in non-R/ECAP areas to disburse concentrations of poverty	Documentation of funding applications	Annually
• Promote homeownership opportunities in high labor market engagement areas with financial assistance to homebuyers using CDBG and HOME funds	Number of households assisted with CDBG and HOME funds	Annually

• Invest CDBG, HOME and ESG funds up to 1,500 units over five (5) years to provide the following:
  • Increase the supply of affordable rental housing
  • Rehabilitate affordable rental and owner housing
  • Provide financial assistance to promote affordable homeownership
• Explore opportunities annually for redevelopment or rehabilitation of residential properties
• Educate CDBG participating communities on options to fund transportation services to link housing to jobs and services
	Number of housing units rehabilitated with CDBG or HOME funds	Annually

Table I.3 continued Action, Measurable Outcome, and Timeline Oakland County		
• Reduce the incidence of predatory lending and discrimination by educating potential homebuyers through Oakland County Housing Counseling • Offer bi-annual fair housing workshops for local real estate and community agencies • Provide local jurisdictions with fair housing information to improve and make more uniform fair housing information on their websites • Continue to provide fair housing outreach and education materials on the County's website. Promote distribution of materials at local service providers. Review locations on an annual basis • Educate landlords on fair housing and reasonable access/modification • Fund the Fair Housing Center of Metropolitan Detroit to assure equal access to housing without discrimination • Engage the Chief Diversity, Equity and Inclusion Officer (CDEIO) to host an annual fair housing summit. The purpose of this event is to raise awareness of fair housing issues • Develop and deliver community best practice workshops around the concept of affordable housing and its cultural and economic value • Provide fair housing resource materials in non-English languages, including Spanish	Number of outreach and education activities	Annually
• Provide letters of support to publicly supported housing developers to encourage development in non-R/ECAP areas to disburse concentrations of poverty	Documentation of letters of support	Annually
• Work with jurisdictions in the County to review development standards for accessible housing and inclusionary policies for accessible housing units; continue recommending appropriate amendments each year, over the next five (5) years	Number of outreach and education activities	Annually
• Promote HIP to seniors and adults with disabilities to assist homeowners to improve access and age in place	Number of outreach and education activities	Annually
• Offer homebuyer education through Oakland County Housing Counseling • Offer bi-annual fair housing workshops for local real estate and community agencies • Provide local jurisdictions with fair housing information to improve and make more uniform fair housing information on their websites • Continue to provide fair housing outreach and education materials on the County's website Promote distribution of materials at local service providers. Review locations on an annual basis. • Educate landlords on fair housing and reasonable access/modification • Fund the Fair Housing Center of Metropolitan Detroit to assure equal access to housing without discrimination • Engage the Chief Diversity, Equity and Inclusion Officer (CDEIO) to host an annual fair housing summit. The purpose of this event is to raise awareness of fair housing issues • Develop and deliver community best practice workshops around the concept of affordable housing and its cultural and economic value • Provide fair housing resource materials in non-English languages, including Spanish	Number of education workshops, fair housing education materials, and agency outreach efforts	Annually

OAKLAND COUNTY COMMUNITY & HOME IMPROVEMENT DIVISION

FOR MORE THAN 40 YEARS

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