

Minimum standards for a Fair Housing Action Plan for CDBG Municipal Sub-recipients

Proposed by the Chicago Area Fair Housing Alliance

As a requirement to receive CDBG and other federal housing and community development funds recipients must demonstrate their efforts to affirmatively further fair housing. We recommend the following minimum standards for addressing the affirmative furthering obligation. In each case, the municipality would benefit from contracting a private non-profit fair housing center, civil rights organization, and/or legal assistance agency. In the case of complaint intake, the municipality should contract a Qualified Fair Housing Organization.

Required Elements:

A. The Municipality must adopt or have adopted a fair housing ordinance that is inclusive of the protected classes within the Fair Housing Act, state equivalent law, and any local ordinances.

Documentation Required in Application:

1. A notarized copy of the municipal ordinance
2. A resolution declaring it as current and effective signed by the Municipality's Chief Officer and Clerk.

B. The Municipality must have a procedure for receiving fair housing complaints. If the municipality does not have an active and working investigative and adjudicative body and procedure, the municipality must provide a procedure for referring fair housing complaints to a working agency for intake and adjudication. The municipality should consult with Qualified Fair Housing Organizations to investigate complaints through testing.

Documentation Required in Application:

1. A copy of the fair housing complaint procedural manual that includes a complaint intake log,
2. Complete contact information for the person responsible for this procedure including name, position, department, phone number, fax number, e-mail address, and mailing address.
3. A list of referral organizations that have been contacted by the Municipality to provide investigations, training, and referrals.

Quarterly Deliverables:

1. Complaint Intake Log
2. A list of referrals made to outside agencies

C. The Municipality must market the community to all under-represented minority groups based on the 2000 Census or a more recently available racial demographic

survey (if available). Under-representation is based on the 2000 Census for the metropolitan region.

Documentation Required in Application:

1. Demographic Analysis
2. Outline for Marketing Strategy

Quarterly Deliverables:

1. Completed Marketing Strategy Document (1st Quarter)
2. Status of Marketing Strategy
3. Copies of all marketing materials

D. The Municipality must provide information about fair housing rights available for all residents and prospective residents including:

1. The equal housing opportunity logo and the statement “[Municipality] is an open and welcoming community to all.” on the municipality’s home page.
2. A link to the municipality’s fair housing ordinance on any web pages related to housing and community relations.
3. Information on all protected classes and how to file a fair housing complaint on a) any web pages related to housing and community relations; b) in conspicuous places in all public libraries, public schools, public clinics, administrative municipal buildings, and civic or community centers; c) through the provision of materials to congregations and community-based organization; and d) on public access channels.
4. Train municipal receptionists to know to whom they should refer fair housing complaints
5. Provide fair housing/human relations educational programs for employees, community and civic groups, and the general public

Documentation Required in Application:

1. url addresses for all web pages
2. Copies of all written education materials
3. Distribution plan and addresses of all required posting locations
4. Training materials for receptionists regarding fair housing referrals
5. Agendas or promotional materials for educational programs

Quarterly Deliverables:

1. Dated Screen Shots of all web pages
2. Distribution log including locations, addresses, quantity of materials, material types (posters, brochures, forms, etc)

E. The Municipality must conduct an analysis of the affordability of both rental and owner-occupied housing and address the need for any further development of affordable housing in the community as it relates to improved integration.

Documentation Required in Application:

1. Plan for Analysis including schedule

Quarterly Deliverables:

2. Methodology of analysis (1st Qtr)
3. Report of Analysis Findings (2nd Qtr)
4. Proposed Actions (3rd Qtr)
5. Status of Actions (4th Qtr)

F. The Municipality must review all zoning ordinances, building codes, and occupancy codes for compliance with the Fair Housing Act, equivalent state law, and the Americans with Disabilities Act.

Documentation Required in Application:

1. Zoning Ordinances
2. Building Codes
3. Occupancy Codes
4. Plan for Review

Quarterly Deliverables:

1. Review Methodology and Documents (1st Qtr)
2. Status of Compliance (2nd and 3rd Qtrs)
3. Revised Ordinances and Codes (4th Qtr)

G. The Municipality must require real estate professionals and multi-family property owners to attend and complete an annual fair housing training session that covers the requirements and protections of the Fair Housing Act, state equivalent law, and any local ordinances.

Documentation Required in Application:

Proposed Training Date

Quarterly Deliverables:

1. Training Agenda and Supporting Documents (1st Qtr)
2. Status Updates (2nd, 3rd, and 4th Qtrs)
3. Sign-In Sheets including name, occupation, company, company address, company phone number, company e-mail, and company web site (by 4th Qtr)
4. Trainer Contact information including name, occupation, company, company address, company phone number, company e-mail, and company web site (by 4th Qtr)

H. Solicit local lenders for affirmative lending plans and require local residential builders during the permit process to provide affirmative marketing plans.

Documentation Required in Application:

1. Notarized copy of residential building permit requirements
2. List of local lenders with affirmative lending plans