

**State of Connecticut
Department of Housing
2014 Analysis of Impediments to Fair Housing Choice
Preliminary Summary of Recommendations
January 29, 2014**

Special Act No. 13-3, An Act Establishing a Task Force to Consider Impediments to Fair Housing Choice, authorized the establishment of a task force to consider legislative solutions to address impediments to fair housing choice.

Federal law requires that the State conduct an analysis of impediments to fair housing choice and take appropriate actions to overcome the effects of impediments identified through that analysis. In recognition of the importance of fair housing, the State engaged the Connecticut Fair Housing Center to assist the State in undertaking an extensive analysis of the impediments to fair housing in Connecticut and preparing the resulting report (the “Analysis of Impediments”). The Department of Housing expects to release the Analysis of Impediments imminently.

In support of the Task Force’s goals, the Department of Housing (“DOH”) is providing this advance preliminary summary of the major recommendations identified in the Analysis of Impediments for overcoming impediments to fair housing.

For the purpose of this review, these preliminary recommendations can be organized into two categories for implementation: near term and long term. This will give us the opportunity to set and achieve goals almost immediately as we work on a parallel path to achieve those goals that require more time, research and coordination with multiple stakeholders.

Near Term:

- In each DOH competitive funding round, and in the CHFA Qualified Allocation Plan, continue to assign a high point value for developments that achieve fair housing goals, in particular expanding affordable housing opportunities in high opportunity communities for groups that experience the most discrimination and highest degree of segregation (Blacks, Latinos, persons with disabilities, and people with a legal source of income other than employment), and continue to refine the effectiveness of the criteria used for awarding such points.
- Review State regulations to ensure they are in compliance with federal regulations, including in particular consulting with stakeholders to review Connecticut’s Fair Housing Regulations located at 8-37ee-1 et seq., and the impact of that regulation on tenant admission to properties funded jointly by the State and HUD (especially concerning two preferences permitted under current State regulation: the residency preference and the preference for individuals of those groups determined least likely to apply as determined by affirmative fair housing marketing plans).
- Continue extensive outreach to municipalities, developers, advocates for affordable housing, supportive housing and fair housing, federal agencies other

state agencies and quasi-governmental entities to increase affordable housing units in high opportunity communities and make targeted investments to revitalize predominantly low-income, highly segregated communities.

- Conduct specific outreach to municipalities to highlight legal requirements to affirmatively further fair housing and promote housing choice and economic diversity through conservation and development policy and zoning regulation.
- Conduct one or more funding rounds for projects and programs designed specifically to affirmatively further fair housing.
- Develop model zoning regulations that promote housing choice and diversity.
- Conduct additional funding rounds to award incentives to municipalities under the Incentive Housing Zone program to increase affordable housing units in high opportunity communities.
- Review for effectiveness all DOH mobility counseling, rent bank and security deposit guaranty programs and make appropriate changes to ensure they are promoting to the greatest extent fair housing choice.
- Within existing resources, support education and training for landlords regarding fair housing obligations.
- Within existing resources, support testing for the incidence of housing discrimination.
- Provide guidance for effective affirmative marketing plans for developers of affordable housing.
- Exercise appropriately the Commissioner of Housing's discretion to approve projects that promote fair housing choice and racial and economic integration even if they are inconsistent with the State Plan of Conservation and Development.
- Within existing resources, support the collection and public dissemination of data regarding impediments to fair housing choice and efforts to affirmatively further fair housing, including for example, housing needs data (including the need for accessible units), housing production and market values data, municipal zoning data, geocoded data for all State-assisted affordable housing investments and individual and family support program beneficiaries (subject to privacy rights).
- Increase funding flexibility to seize immediate development opportunities to increase affordable housing units in high opportunity communities.

It is worth noting that some of these recommendations are already underway and will continue. Several of these recommendations can also be found in the January 2014 Report of the Interagency Council on Affordable Housing.

Long-Term:

- Continue Near-Term activities as applicable.
- Review state laws and regulations and make recommendations for changes where there are conflicts with state or federal fair housing legal requirements (for example, CGS § 8-3f regarding co-location of multiple child-care residential facilities).

- Evaluate the effectiveness of DOH and CHFA funding rounds in facilitating the creation of new family affordable housing units to ensure the availability of affordable housing in diverse areas.
- Incorporate fair housing strategies and goals into the Consolidated Plan for Housing and Community Development 2016-2020.
- Within existing resources, support the enforcement of fair housing laws.
- Recommend legislation designed to overcome existing impediments for fair housing choice and affirmatively further fair housing.

In the course of preparing the Analysis of Impediments, including its recommendations, it became clear that to make real progress in affirmatively furthering fair housing choice a multi-faceted approach is necessary. There are steps DOH and municipalities can take together and separately to affirmatively further fair housing choice. Other recommendations require collaboration among DOH and other stakeholders, including other governmental entities and private parties. The Analysis of Impediments does not include any recommendations for specific legislative changes at this time but rather a process for convening stakeholders to review proposed legislative solutions to existing impediments to fair housing with the benefit of appropriate data. Through such a collaborative approach, DOH seeks to inform legislation that will affirmatively further fair housing in all communities in the State of Connecticut.