

APPENDIX M:

**FAIR HOUSING
ACTION PLAN**

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FAIR HOUSING ACTION PLAN TO ADDRESS IMPEDIMENTS TO FAIR HOUSING CHOICE, 2010 TO 2015

SAN DIEGO REGIONAL – IMPEDIMENTS IDENTIFIED COUNTYWIDE						
IMPEDIMENTS TO BE ADDRESSED	GOALS	ACTIVITIES OR STRATGIES TO MEET THE GOALS	RESPONSIBLE ENTITIES ASSIGNED TO MEET GOALS	PROPOSED INVESTMENT	FY 2013 ACCOMPLISHMENTS	
1	Limited educational and outreach literature regarding fair housing issues, rights, and services on websites/public counters	Increase availability of media regarding fair housing issues, rights and services	Ensuring ease of access to information about fair housing on websites with links between jurisdiction and contracted service provider. Prominently display information on public counters and other points of public contact such as libraries and community centers. Increase knowledge of the process of reporting complaints and access/referral to government entities: DFEH/HUD/DOJ.	While this impediment applies to all jurisdictions, the cities of Chula Vista, Coronado, Del Mar, Imperial Beach, Lemon Grove, San Diego, Solana Beach, National City, La Mesa, and Escondido should provide additional links and detailed information about Fair Housing on their websites.	Included in the City of San Diego's current Fair Housing Services contracts. (\$523,869 in FY 2012-FY 2013)	Fair Housing website has been maintained on the City of San Diego webpage. In addition, during FY 2013, 6609 multilingual brochures were distributed to various audiences and a "Practice Fair Housing" citywide newsletter was initiated.
2	Lack of knowledge pertaining to current laws for new homeowners becoming landlords	Increase knowledge among small property owners about fair housing	Coordination of education efforts between the fair housing service providers and all entitlement and participating jurisdictions. Target education and outreach materials in the small property owner population.	Service providers and all entitlement and participating jurisdictions.	Included in the City of San Diego's current Fair Housing Services contracts. (\$523,869 in FY 2012-FY 2013)	During FY 2013, eight (8) Fair Housing workshops were conducted for property owners and landlords.
3	Fair Housing violations committed by predominately small "mom and pop: rental operations	Decrease fair housing violations committed by small rental operations	Coordination of education efforts between fair housing service providers and all entitlement and participation jurisdictions Target education and outreach materials to the small property owner market population	Service providers and all entitlement and participating jurisdictions.	Included in the City of San Diego's current Fair Housing Services contracts. (\$523,869 in FY 2012-FY 2013)	During FY 2013, the eight (8) Fair Housing workshops conducted for property owners and landlords included small "mom and pop" rental operations.

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4	Under-representation among Hispanics and Blacks in the homebuyer market and observed large disparities in loan approval rates	Increase representation among minorities in the homebuyer market and reduce observed disparities in loan approval rates	<p>Collaboration with the San Diego Reinvestment Task Force to implement the recommendations contained in the Three Year Plan.</p> <p>Homebuyer programs increasing outreach efforts and homeownership opportunity awareness to minority communities</p>	Service providers and all entitlement and participating jurisdictions.	<p>Included in the City of San Diego's current Fair Housing Services contracts. (\$523,869 in FY 2012-FY 2013)</p> <p>In addition, the City of San Diego is actively supporting the activities of the regional Fair Housing Resource Board with regard to collaborations with the San Diego City/County Reinvestment Task Force.</p>	The City of San Diego continued to support the activities of the San Diego Regional Alliance for Fair Housing (formerly, the Fair Housing Resource Board) with regard to collaboration with the San Diego City/County Reinvestment Task Force. The City of San Diego chairs the Alliance's Subcommittee for Strategic Planning.
5	Reoccurring rental /home market application denial due to credit history and financial management factors	Reduce rental/home market application denial due to credit history and financial management factors	<p>Provide findings of this AI and other related studies to the Community Reinvestment Initiatives (CRI) Task Force</p> <p>Homebuyer programs should continue providing education and outreach on credit history and financial management</p> <p>Collaboration with the CRI to implement the recommendations contained in the Three Year Plan.</p>	Service providers and all entitlement and participating jurisdictions	<p>Included in the City of San Diego's current Fair Housing Services contracts. (\$523,869 in FY 2012-FY 2013)</p> <p>In addition, the City of San Diego is actively supporting the activities of the regional Fair Housing Resource Board with regard to collaborations with the San Diego City/County Reinvestment Task Force.</p>	The City of San Diego continued to support the activities of the San Diego Regional Alliance for Fair Housing (formerly, the Fair Housing Resource Board) with regard to collaboration with the San Diego City/County Reinvestment Task Force. The City of San Diego chairs the Alliance's Subcommittee for Strategic Planning.

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6	Persistent and increasing housing discrimination based on disability, national origin, and familial status	Reduce housing discrimination based on race, disability, national origin and familial status	Conduct comprehensive, countywide random testing regularly to identify issues, trends, and problem properties. Expand testing to cover other protected classes, especially those with emerging trends of suspected discriminatory practices. Support stronger and more persistent enforcement activity by fair housing service providers. Expand education and outreach efforts, especially to small rental property owners	Service providers and all entitlement and participating jurisdictions.	Included in the City of San Diego's current Fair Housing Services contracts. (\$523,869 in FY 2012-FY 2013)	During FY 2013, one-hundred thirty-three (133) random paired fair housing tests were conducted in the categories of disability, color, familial status and national origin in the arena of rental, sales, insurance, lending and accessibility
7	Racial segregation - significant patterns of racial and ethnic concentration	Reduction of racial segregation to create a more diverse and equal San Diego County	Diversify and expand the housing stock to accommodate the varied housing needs of different groups Promote equal access to information for all residents on the availability of decent and affordable housing by providing information in multiple languages and through venues and media that have proven success in outreaching to the community, particularly hard-to-reach groups Collaboration with local housing authorities and affordable housing providers to ensure affirmative fair marketing plans and deconcentration policies are implemented	All jurisdictions	Included in the City of San Diego's current Fair Housing Services contracts. (\$523,869 in FY 2012-FY 2013)	In FY 2013, the Legal Aid Society of San Diego, Inc., one of the Fair Housing providers under contract with the City of San Diego, worked with the San Diego Housing Commission in order to develop a strategy for deconcentration of Housing Choice Vouchers. In addition, 6609 multilingual brochures were distributed during FY 2013 to promote equal access to information. The languages included: English, Spanish, Vietnamese, Chinese, and Tagalog.

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8	Overconcentration of Section 8 Voucher use in specific geographic areas	Geographic dispersal of Section 8 voucher usage	<p>Expand the availability of affordable housing inventory and implement policies to discourage overconcentration of affordable housing units within individual jurisdictions</p> <p>Promote the Housing Choice Voucher program to rental property owners</p> <p>Increase education of Section 8 voucher recipients as to choice and availability. Collaboration with local housing authorities and affordable housing providers to ensure affordable fair marketing plans and deconcentration policies are implemented</p> <p>Implement the Choice Communities Initiative and Moving Forward Plan by the San Diego Housing Commission (SDHC) to expand locational choices for voucher use</p> <p>SDHC should explore mechanisms to deconcentrate voucher usage within individual jurisdictions</p>	<p>While this impediment applies to all jurisdictions, the cities of El Cajon, National City, and others more heavily impacted by high concentrations of voucher usage are of utmost concern.</p> <p>San Diego Housing Commission</p>	Available housing funds	In FY 2013, the Legal Aid Society of San Diego, Inc., one of the Fair Housing providers under contract with the City of San Diego, worked with the San Diego Housing Commission in order to develop a strategy for deconcentration of Housing Choice Vouchers.
9	Limited housing choice for persons with disabilities	Increase housing choices for persons with disabilities	<p>Expand the variety of available housing types and sizes</p> <p>Increase housing options for not only persons with disabilities, but also senior households, families with children, farmworkers, the homeless, etc.</p> <p>Create a database of housing types with emphasis on disabled access and senior housing within the San Diego region.</p>	All jurisdictions	The City of San Diego is actively participating in collaboration with the regional Fair Housing Resource Board to address this impediment.	The City of San Diego continued to support the activities of the San Diego Regional Alliance for Fair Housing (formerly, the Fair Housing Resource Board) with regard to collaboration with the San Diego City/County Reinvestment Task Force. The City of San Diego chairs the Alliance's Subcommittee for Strategic Planning.

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10	Non-adoption of a universal design ordinance	Adoption of a universal design ordinance.	Encourage/require universal design principles in new housing developments Jurisdictions with a residential rehabilitation program should specifically includes ADA-compliant upgrades in their programs; also consider program modifications to allow financial assistance for accessibility improvements for renters/homeowners	All jurisdictions	The City of San Diego is actively participating in collaboration with the regional Fair Housing Resource Board to address this impediment.	The City of San Diego continued to support the activities of the San Diego Regional Alliance for Fair Housing (formerly, the Fair Housing Resource Board) with regard to collaboration with the San Diego City/County Reinvestment Task Force. The City of San Diego chairs the Alliance's Subcommittee for Strategic Planning.
11	Minorities and families of children disproportionately affected by lead-based paint hazards.	Require lead-based paint testing in all homebuyer and residential rehabilitation programs.	Require and provide for lead-based paint testing in all homebuyer and residential rehabilitation programs. Increase education of lead-based paint hazards to tenants and first time homebuyers.	While this impediment applies to all jurisdictions , the cities of Coronado, Del Mar, Encinitas, Imperial Beach, Lemon Grove, Solana Beach, National City, and Santee should implement lead-based paint testing in their homebuyer and residential rehabilitation programs-if no homebuyer program is in effect, provide other provisions.	Available housing funds	The City of San Diego supports and encourages the ongoing program offered by the San Diego Housing Commission for lead-based paint hazards in low-income housing units.

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12	Minimal regional collaboration among fair housing service providers.	Increase regional collaboration among fair housing service providers	<p>Increase collaboration between fair housing service providers, affirmatively furthering fair housing in the region.</p> <p>Utilization of a single reporting system by service providers to compile consistent fair housing data; facilitating analysis of trends and patterns.</p> <p>Annual review of scope of work by entitlement jurisdictions to identify service gaps.</p>	<p>Service providers and all entitlement and participating jurisdictions</p> <p>Fair Housing Resources Board</p>	The City of San Diego is actively participating in collaboration with the regional Fair Housing Resource Board to address this impediment.	The City of San Diego continued to support the activities of the San Diego Regional Alliance for Fair Housing (formerly, the Fair Housing Resource Board) with regard to collaboration with the San Diego City/County Reinvestment Task Force. The City of San Diego chairs the Alliance's Subcommittee for Strategic Planning. The Strategic Planning Subcommittee meets 8 times per year, while the Alliance meets quarterly. Included in these meetings is the review of a single reporting system to compile regional fair housing activities and testing information, to facilitate the analysis of trends and patterns.

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13	Inconsistent discrepant data in fair housing service provider statistical reporting	Consistent, concurring fair housing service provider statistical reporting	Develop a uniform reporting method and consistent reporting categories to report fair housing data.	Service providers and all entitlement and participating jurisdictions Fair Housing Resources Board	Included in the City of San Diego's current Fair Housing Services contracts. (\$523,869 in FY 2012-FY 2013) The City of San Diego is actively participating in collaboration with the regional Fair Housing Resource Board to address this impediment.	The City of San Diego continued to support the activities of the San Diego Regional Alliance for Fair Housing (formerly, the Fair Housing Resource Board) with regard to collaboration with the San Diego City/County Reinvestment Task Force. The City of San Diego chairs the Alliance's Subcommittee for Strategic Planning. The Strategic Planning Subcommittee meets 8 times per year, while the Alliance meets quarterly. Included in these meetings is the review of a single reporting system to compile regional fair housing activities and testing information, to facilitate the analysis of trends and patterns.

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14	<p>Difficulty in gauging the success/progress of education and outreach efforts to sub-recipient contracts, Action Plan, CAPER reports and annual accomplishment reports.</p>	<p>Comprehensive reporting of fair housing success/progress in education and outreach efforts.</p>	<p>Increase report of quantifiable goals, objectives, and accomplishments through outcome-based performance measures.</p> <p>Publicize the outcomes of fair housing complaints to encourage reporting.</p>	<p>While this impediment applies to all jurisdictions, the City of Oceanside should establish outcome-based performance measures.</p> <p>All jurisdictions should continue to identify specific quantifiable objectives and measurable goals related to furthering fair housing</p>	<p>Included in the City of San Diego's current Fair Housing Services contracts. (\$523,869 in FY 2012-FY 2013)</p> <p>The City of San Diego is actively participating in collaboration with the regional Fair Housing Resource Board to address this impediment.</p>	<p>The City of San Diego has identified quantifiable objectives and measurable goals related to furthering fair housing. (see Objective 12.2 of Appendix E of the FY 2013 CAPER). The City of San Diego continued to support the activities of the San Diego Regional Alliance for Fair Housing (formerly, the Fair Housing Resource Board) with regard to collaboration with the San Diego City/County Reinvestment Task Force. The City of San Diego chairs the Alliance's Subcommittee for Strategic Planning. The Strategic Planning Subcommittee meets 8 times per year, while the Alliance meets quarterly. Included in these meetings is the review of a single reporting system to compile regional fair housing activities and testing information, to facilitate the analysis of trends and patterns.</p>

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15	Fair Housing service disparities across the region	High-quality fair housing service across the region	<p>Collaboration with fair housing service providers to ensure an adequate level of service is available to all residents.</p> <p>Evaluate service gaps and establish appropriate levels of funding for the provision of these services</p> <p>Regularly update the service area map and provide the public with clear information on service providers and types available</p> <p>Establish a collaborative relationship with the 2-1-1 San Diego Hotline.</p> <p>Educate and train phone operators to identify and direct fair housing issues to the appropriate service providers.</p> <p>Listing of fair housing service providers as a part of available community service</p>	<p>Service providers and all entitlement and participating jurisdictions</p> <p>Fair Housing Resources Board</p>	<p>Included in the City of San Diego's current Fair Housing Services contracts. (\$523,869 in FY 2012-FY 2013)</p> <p>The City of San Diego is actively participating in collaboration with the regional Fair Housing Resource Board to address this impediment.</p>	<p>The City of San Diego meets monthly with its two Fair Housing Service providers (Legal Aid Society of San Diego, Inc. and Housing Opportunities Collaborative) in order to evaluate service gaps and to ensure an adequate level of service is available to all residents. In addition, the City of San Diego has established a Fair Housing Hotline to ensure its Fair Housing services are available to the community.</p>
16	Exclusion of random testing/testing audits from fair housing service provider contracts	Proactive testing audits for discrimination in the housing market--decreased reliance on inaccurate, complaint driven testing	<p>Incorporate random testing/testing audits in fair housing service provider's contracts.</p> <p>Conduct audits in 2011 and every two years thereafter</p> <p>Conduct regional audits.</p> <p>Collaboration between entitlement jurisdictions and fair housing service providers to pursue FHIP funds for audits and testing as funding is available.</p>	<p>Service providers and all entitlement and participating jurisdictions</p>	<p>Included in the City of San Diego's current Fair Housing Services contracts. (\$523,869 in FY 2012-FY 2013)</p>	<p>During FY 2013, one-hundred thirty-three (133) random paired fair housing tests were conducted in the categories of disability, color, familial status and national origin in the arena of rental, sales, insurance, lending and accessibility</p>

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17	Disconnect between tenant/landlord disputes and fair housing discrimination prevention	Fair Housing encouragement towards tenant/landlord dispute resolution	Ensure tenant/landlord dispute resolution services are provided to compliment fair housing services. Addition of tenant/landlord mediation services currently offered by NCL to housing services provided by other fair housing service providers	Service providers and all entitlement and participating jurisdictions	Included in the City of San Diego's current Fair Housing Services contracts. (\$523,869 in FY 2012-FY 2013)	The Fair Housing Hotline operators with the Housing Opportunities Collaborative provide education and referrals for tenant/landlord dispute resolution.
18	Substandard housing conditions tend to impact minority households disproportionately.	Identify and when feasible, implement programs that improve substandard housing conditions.	Make lead-based paint testing part of housing rehabilitation programs. Consider modifying housing rehabilitation program to make financial assistance for accessibility improvements available for renters as well as homeowners	Entitlement and participating jurisdictions	Available housing funds	The City of San Diego supports and encourages the ongoing program offered by the San Diego Housing Commission for lead-based paint hazards in low-income housing units.
19	Fair Housing service providers should actively pursue Fair Housing Initiative Program (FHIP) funds	Obtain additional funds for service providers to conduct fair housing testing services.	Encourage the selection of organizations that meet criteria to receive FHIP funds. Encourage fair housing providers to seek FHIP funds for fair housing testing services.	Entitlement and participating jurisdictions. Service providers and entitlement/participating jurisdictions.	No actual expenditure of funds is needed to accomplish this goal.	In FY 2013, the Legal Aid Society of San Diego, Inc. submitted a FHIP application with the support of the City of San Diego.

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SAN DIEGO JURISDICTIONAL - IMPEDIMENTS IDENTIFIED WITHIN THE CITY OF SAN DIEGO						
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1	The City of San Diego conditional permits emergency shelters but does not meet the State Law requirement to permit emergency shelters by right in at least one zoning district where adequate capacity is available to accommodate at least one year-round shelter.	Amend Zoning Ordinance, as necessary	Amend the Zoning Ordinance to permit emergency shelters by right in at least one zone to comply with State Law.	City staff	CDBG	In FY 2013, the City of San Diego Housing Element was updated and approved by the California Statement Department of Housing and Community Development.
2	The City's Zoning Ordinance does not provide a definition of supportive housing.	Amend Zoning Ordinance, as necessary	Amend the Zoning Ordinance to include a definition of supportive housing.	City staff	CDBG	To be addressed during FY 2014-2015
3	Eight ZIP Codes in the City have high concentrations of Section 8 Housing Choice Vouchers. Reflecting the high correlations between minority concentrations and low/moderate income areas, several ZIP codes of high proportions of minority households receiving Housing Choice Vouchers.	Deconcentrate voucher use.	Continue to implement the Choice Communities initiative, Moving Forward Plan, and Housing Choice Voucher Homeownership Program, among other programs and activities to deconcentrate voucher use.	City staff	Available housing funds	In FY 2013, the Legal Aid Society of San Diego, Inc., one of the Fair Housing providers under contract with the City of San Diego, worked with the San Diego Housing Commission in order to develop a strategy for deconcentration of Housing Choice Vouchers.

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