



2015

Analysis of Impediments to Fair Housing Choice

Submitted by: Housing
Opportunities Project for Excellence, Inc.
(HOPE)
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**2015 Analysis of Impediments to Fair Housing Choice
Miami-Dade County, Florida
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I. INTRODUCTION

A. History and Purpose of the AI

The Federal Fair Housing Act, Title VIII of the Civil Rights Act of 1968, as amended, was passed in order to promote diverse and inclusive communities and to prohibit housing discrimination based on race, color, national origin, religion, sex, familial status, and disability. Section 808(e)(5) of the Act requires the Secretary of the U.S. Department of Housing and Urban Development (the Department) to administer the Department's housing and urban development programs in a manner to affirmatively further fair housing (AFFH). Accordingly, localities that are direct recipients of Community Development Block Grant (CDBG) funds are required by the Consolidated Plan regulations, at 24 CFR Part 91, to certify that they will affirmatively further fair housing. This certification further requires the grantee to undertake Fair Housing Planning which consists of conducting an Analysis of Impediments to Fair Housing Choice (AI) within its jurisdiction, taking actions to overcome the effects of any impediments identified through the analysis, and maintaining records reflecting the analysis and actions taken in this regard. Grantees continue to certify that they will affirmatively further fair housing as a condition of continuing to receive federal funds. Although a grantee's AFFH obligation arises in connection with the receipt of Federal funds, its AFFH obligation is not restricted to the design and operation of HUD-funded programs at the State or local level. The AFFH obligation extends to all housing and housing-related activities in the grantee's jurisdictional area whether publicly or privately funded.

Grantees, such as Miami-Dade County, meet their AFFH obligation by conducting an AI (which identifies those systemic or structural issues that limit the ability of people to take advantage of the full range of housing which should be available to them), developing an Action Plan (with milestones, timetables and measurable results) and implementing strategies that are designed to overcome the impediment to fair housing choice based on the grantees' history, circumstances, and experiences. HUD defines "impediments to fair housing choice" as any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices or any actions, omissions, or decisions which have the effect of restricting housing choices, or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

On July 8, 2015, the U.S. Department of Housing and Urban Development (HUD) released a final rule on Affirmatively Furthering Fair Housing clarifying and simplifying existing fair housing obligations for HUD grantees to analyze their fair housing landscape and set locally-determined fair housing priorities and goals through an Assessment of Fair Housing (AFH). Under the new rule, the AFH will replace the AI. The rule creates a streamlined AFH planning process, which will help communities analyze challenges to fair housing choice and establish their own goals and priorities to address the fair housing barriers in their community.

While the final rule will take effect 30 days after publication (July 8, 2015), it will not be fully implemented immediately. The initial AFH needs to be submitted at least 270 calendar days before the start of the program participants' new Consolidated Plan year. Miami-Dade County will not be required to complete its AFH until 270 days prior to its 2018-2022 Consolidated planning cycle and until such time, the County is required to comply with existing requirements and conduct this analysis of impediments. Component parts of the AFH are, however, included in this AI to the extent possible.

B. Entity Engaged to Conduct the 2015 AI

Housing Opportunities Project for Excellence, Inc. (HOPE) is a private fair housing, non-profit, Florida, corporation established in 1988, dedicated to eliminating housing discrimination and promoting fair housing. HOPE's mission is to fight housing discrimination in Miami-Dade and Broward Counties and to ensure equal housing opportunities throughout Florida. HOPE is the only private, full-service fair housing organization in Miami-Dade and Broward counties engaged in testing for fair housing law violations and pursuing the enforcement of meritorious claims. HOPE has completed AIs as consultants to twenty jurisdictions in Florida and has provided Fair Housing Planning services for two decades.

C. Methodology

The methodology in undertaking this Analysis of Impediments to Fair Housing Choice is outlined below:

Project Implementation

- Meeting with the jurisdiction project manager to define public input opportunities/strategies and identifying key departments and individuals for written feedback and interviews
- Review of impediments found in prior AI and actions taken to address identified impediments

Community Data Review

- Collection and review of data/maps available from the U.S. Census and American Community Surveys to compile all relevant demographic, economic, employment and housing market information
- Review of data from the jurisdiction's most recently completed Consolidated and Comprehensive Plans
- Collection and review of various data and maps from local transportation and employment studies

- Analysis of lending data from the Home Mortgage Disclosure Act obtained and processed utilizing LendingPatterns™ (a web-based data mining and exploration tool)
- Review of the Florida Housing Data Clearinghouse database in addition to foreclosure data from the jurisdiction's official website and Realty Trac

Regulatory Review

- Review of information regarding the jurisdiction's current development regulations, planning and zoning regulations, housing and land use policies, and programs that influence housing choice; designed and distributed revised Fair Housing Planning Guide questionnaires to relevant departments of the jurisdiction

Compliance Data Review

- Analysis of available data regarding compliance with local, state and federal Fair Housing Law, including the Home Mortgage Disclosure Act (HMDA), the Fair Housing Act; review of reported fair housing complaints and legal cases involving Fair Housing law

Direct Surveys

- Administration of face-to-face surveys with residents of the jurisdiction and industry stakeholders. The survey was designed to gauge perceptions of housing discrimination, housing issues effecting the jurisdiction, and knowledge of fair housing laws and resolution options.

The Miami-Dade AI includes input from county officials, citizens, and key persons involved in the housing and community development industry, and particularly, fair housing. Surveys were utilized to gather information from housing consumers and from various sectors of the housing industry about their experiences and perceptions of housing discrimination and their knowledge of fair housing laws and services.

D. Funding

The project was funded through an administrative contract between the Miami-Dade County and HOPE. Community Development Block Grant funds were utilized in funding this effort.

E. Fair Housing Planning History

HOPE conducted the 1996, 2004 and 2010 Miami-Dade County *Analysis of Impediments to Fair Housing Choice*. The 2010 *Analysis* identified the following impediments to fair housing choice in Miami-Dade County:

Identified Impediments to Fair Housing Choice 2010

1. Violations of Federal, State, and Local Fair Housing Laws

2. The Need for On-Going Fair Housing Education & Outreach Efforts to Reach the County's Growing, Diverse Population
3. Shortage of/Barriers to Affordable Housing & Homeownership
4. Issues Affecting Persons with Disabilities and the Homeless
5. Lack of Knowledge of Fair Housing Protections and Redress under Fair Housing Laws
6. Fair and Equal Lending Disparities

F. Summary of Actions Taken Since Completion of 2010 AI

HOPE conducted and submitted the *Analysis of Impediments to Fair Housing Choice* for Miami-Dade County in 2010. Miami-Dade County has contracted with HOPE utilizing CDBG funding for fiscal years 2011, 2012, and 2014 following the completion of the 2010 *Analysis* to conduct fair housing activities and implemented programs designed to address identified impediments and to affirmatively further fair housing.

Aside from innovative approaches to expand the housing choices of its residents through a variety of programs discussed herein, Miami-Dade County funded a Fair Housing Education & Outreach Initiative, conducted throughout the jurisdiction and implemented by HOPE, that is designed to inform the general public, including community groups, housing industry, lenders, and special needs populations (such as disability advocacy groups) about the rights conferred by federal, state, and local fair housing laws. Specialized fair housing workshops are designed to educate the participants about fair housing laws, how to recognize discriminatory housing practices, and the avenues of redress available to them. The Initiative benefits persons who are denied access to the housing of their choice because of their race, color, religion, national origin, sex, disability, familial status, ancestry, age, pregnancy, marital status, sexual orientation, gender identity, gender expression, source of income, or status as victim of domestic violence.

Specialized workshops for housing providers have been conducted to promote compliance with fair housing laws and affirmative marketing requirements. Through its contracts with HOPE, the County has also provided individualized technical assistance in affirmative marketing and the adoption of fair housing policies to all of its CDBG/HOME funded CDC'S/CHDOS. An on-going media awareness campaign using Public Service Announcements, feature articles/ad's, community affairs programs and advertising monitoring has also been sponsored by Miami-Dade County in addition to the dissemination of a quarterly fair housing newsletter which highlights national, state, and local fair housing news. Fair housing counseling is provided on the housing discrimination telephone "HELP LINE" which handles inquiries related to a myriad of housing discrimination-related issues. Consistent Miami-Dade funding of HOPE's Education and Outreach Initiative leverages support for HOPE's Private Enforcement Initiative which involves testing and investigation of alleged fair housing violations, pursuing the enforcement of meritorious claims, and the prevention and elimination of discriminatory housing practices throughout the county.

The following table summarizes the activities undertaken under the E/O Initiative in 2011 and then from April to December in both 2012 and 2014 to assist in addressing impediments to fair housing choice identified in the 2010 AI:

Entitlement jurisdiction	Community presentations	Housing provider trainings	Fairs	People reached	HOPE <i>Forum</i> newsletter
Miami-Dade County	200 events	26 events	36 events	5,453	10 editions at 2,500 copies each = 25,000 total pieces

For 2011 and then from April to December in both 2012 and 2014, 262 appearances (including community presentations, housing provider trainings, and fairs) for 5,453 participants in Miami-Dade County. In these appearance, HOPE covered fair housing laws/rights/responsibilities; how to recognize and report housing discrimination; predatory lending; disability rights/accommodations & modifications; affirmative marketing and related topics. Ten editions of the *HOPE Forum* newsletter were published and more than 5,000 fair housing brochures were distributed in English, Spanish, and Haitian Creole.

In addition to its above-mentioned support of fair housing education and outreach efforts, the County has furthered fair housing by enacting and amending ordinances that support fair housing. Section 11A-18.1 of the Miami-Dade County Code of Ordinances requires condominium associations, homeowners' associations, and cooperative associations to provide rental or purchase applicants "with written notice specifically identifying any and all items in the application that need to be completed or corrected" and also requires associations to provide written notice of application acceptance or rejection and explanations regarding rejections. These requirements prevent such associations from using unsubstantiated denials as pretexts when their true reason for refusing applicants is based upon illegal housing discrimination. Related sections of the Code amended after the 2010 AI that also enhance fair housing are found in Sections 11A-11(12) and 11A-12(1). These amendments clarify that income is a protected fair housing status and that "Section 8 Housing Choice Vouchers, Supplemental Security Income, Social Security, pensions and other retirement benefits" are included as sources of income. This extends the existing list of protected statuses to protect an even wider group of potential victims that is covered under the Fair Housing Act.

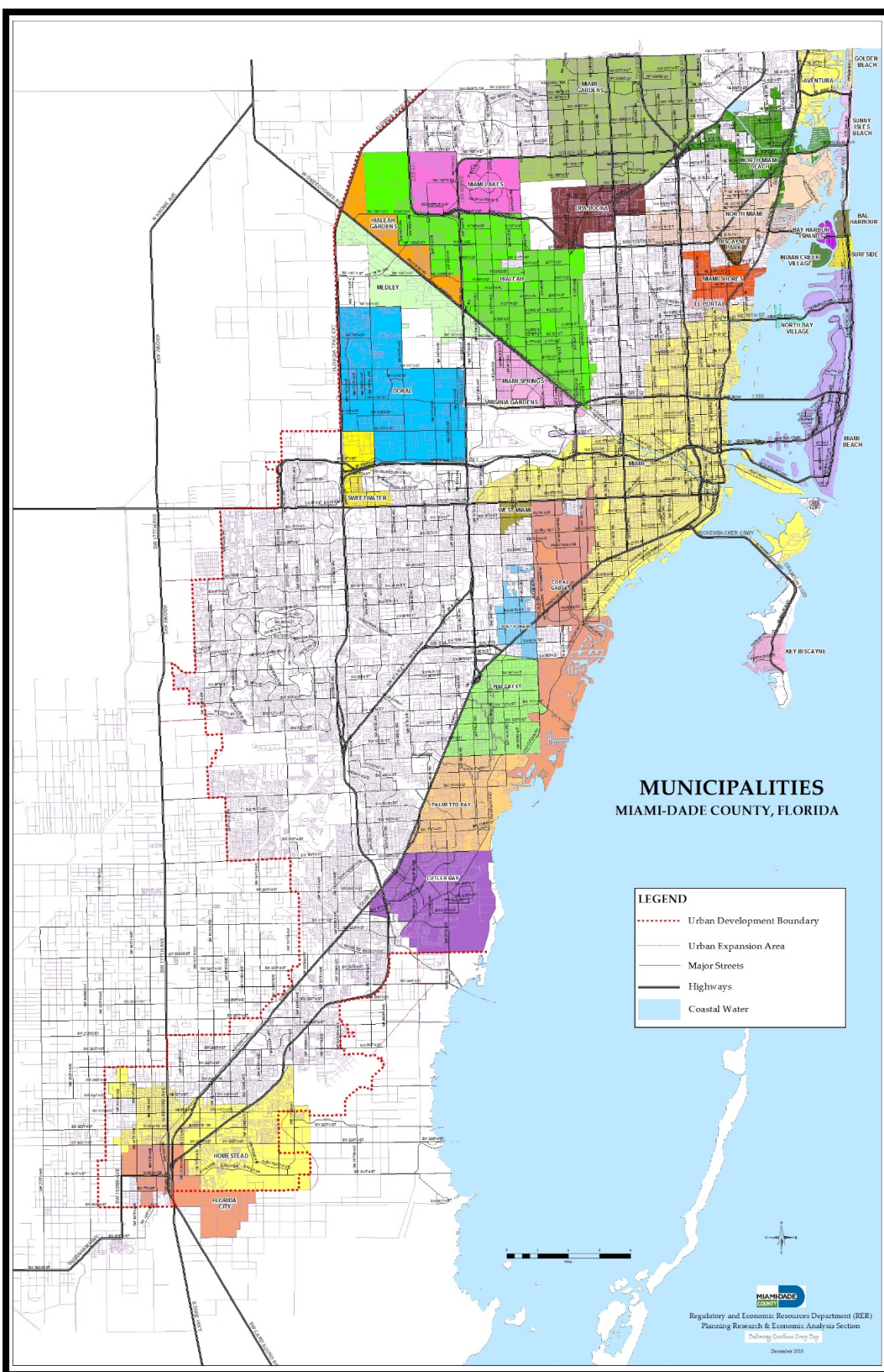
II. JURISDICTIONAL AND COMMUNITY PROFILE

A. History & Government Structure

Miami-Dade County is located in the southeastern part of the state of Florida. The United States Census Bureau estimates that the county population was 2,662,874 in 2014, making it the most populous county in Florida and the seventh-most populous county in the United States. It is also Florida's most populous county and the state's third largest county by land area. The county's population makes up approximately half of the South Florida metropolitan area population and holds several of the principal cities of South Florida. The county seat is the city of Miami, the largest city within the county.

According to the U.S. Census Bureau, the county has a total area of 2,431 square miles, of which 1,898 square miles is land and 485 square miles is water, most of which is Biscayne Bay, with another significant portion in the adjacent waters of the Atlantic Ocean. Miami-Dade County is close to sea level in elevation averaging about 6 feet above sea level. Miami is the only metropolitan area in the United States that borders two national parks. Biscayne National Park is located east of the mainland, in Biscayne Bay, and the western third of Miami-Dade County lies within Everglades National Park, while the northwest portion of the county contains a small part of the Big Cypress National Preserve.

The county is home to 35 incorporated municipalities (see following *Miami-Dade Municipalities* map). The northern, central and eastern portions of the county are heavily urbanized with many high rises along the coastline, as well as the location of South Florida's central business district, Downtown Miami. Southern Miami-Dade County includes the Redland and Homestead areas, which make up the agriculture economy of the metropolitan area. The Redland makes up approximately one third of the county's inhabited land area and is sparsely populated in stark contrast to the densely populated, urban northern Miami-Dade County. The western portion of the county extends into the Everglades National Park and is unpopulated.



Along with Miami-Dade County's official website, the works of two noted authors/historians (Arva Moore Parks', *Miami: The Majic City* published in 1991, and Helen Muir's *Miami, U.S.A.* published in 1953) provide valuable insight into the colorful history of the county as we know it today. The earliest evidence of Native American settlement in the Miami region came 12,000 years ago with its first inhabitants settling on the banks of the Miami River. The inhabitants at the time of the first European contact in the 1500's were the Tequesta people who controlled much of southeastern Florida.

Juan Ponce de Leon visited the area in 1513. Two years after founding St. Augustine, Admiral Pedro Menendez de Aviles established the first European mission on the Miami River in 1567. Hostile Native Americans and mosquitoes forced them to leave and the Spanish controlled Florida for the next 250 years, bringing with them weapons and diseases that eventually caused the Tequestas to vanish. In the early 1800's people came from the Bahamas to South Florida to hunt for treasure from the ships that ran aground on the Great Florida Reef. Some accepted land offers along the Miami River. At about the same time the Seminole Indians arrived, along with a group of runaway slaves. Spain sold Florida to the United States for five million dollars in 1821 and by 1830 the Bahamian lands along the river were purchased and became a slave plantation. A series of wars against the Seminoles kept the environment hostile to settlers for several years.

Dade County was created on January 18, 1836 under the Territorial Act of the United States. The county was named after Major Francis L. Dade, a soldier killed in 1835 in the Second Seminole War. At the time of its creation, Dade County included the land that now contains Palm Beach and Broward counties, together with the Florida Keys from Bahia Honda Key north and the land of present day Miami-Dade County. In 1844 the county seat was finally moved to Miami and six years later a census reported 96 residents living in the area. By the late 1890's there were fewer than 1,000 residents in all of Dade County. The modern era began with the arrival of Henry Flagler's railroad in 1896, as the City of Miami was incorporated that same year with 344 voters. The destruction of mangroves and draining swampland created new land for settlers. A real estate boom in the 1920's transformed the area as new subdivisions and tourist resorts were developed. That boom, however, was interrupted by a major hurricane, the stock market crash and the Great Depression. A population surge followed World War II as troops previously trained here returned with their families, and tourism increased as advancements in transportation helped the area become a year-round resort. Beginning in the 1960s, thousands of refugees from Cuba came to the area, as did Haitians and Nicaraguans beginning in the 1980's, seeking a better quality of life. Emigration accounted for the county's population surpassing one million by 1962. Today's Miami International Airport and Port of Miami help make the county the North American gateway to Latin America and the Caribbean.

The second-costliest natural disaster to occur in the United States was Hurricane Andrew, which hit Miami on August 24, 1992. Damages numbered over \$20 billion in the county alone, and successful recovery has taken years in areas where the destruction was greatest. On November 13, 1997, voters changed the name of the county from "Dade" to "Miami-Dade" to acknowledge

the international name recognition of Miami.

Miami-Dade County has operated under a unique metropolitan system of government, a "two-tier federation," since 1957, made possible when Florida voters approved a constitutional amendment in 1956 that allowed the people of Dade County (as it was known then) to enact a home rule charter. Prior to this year, home rule did not exist in Florida, and all counties were limited to the same set of powers by the Florida Constitution and state law. Unlike a consolidated city-county, where the city and county governments merge into a single entity, these two entities remain separate. Instead there are two levels of government: city and county. Cities are the "lower tier" of local government, providing police and fire protection, zoning and code enforcement, and other typical city services within their jurisdiction. These services are paid for by city taxes. The County is the "upper tier", and it provides services of a metropolitan nature, such as emergency management, airport and seaport operations, public housing and health care services, transportation, environmental services, solid waste disposal etc. These are funded by county taxes, which are assessed on all incorporated and unincorporated areas.

The Executive Mayor of Miami-Dade County is elected countywide to serve a four-year term. The Mayor is not a member of the County Commission. The Mayor appoints Deputy Mayors to oversee the operations of the County Departments. The Mayor has veto power over the Commission. The Board of County Commissioners is the legislative body, consisting of 13 members elected from single-member districts. Members are elected to serve four-year terms, and elections of members are staggered. The Board chooses a Chairperson, who presides over the Commission, as well as appoints the members of its legislative committees. The Board has a wide array of powers to enact legislation, create departments, and regulate businesses operating within the County. It also has the power to override the Mayor's veto with a two-thirds vote.

Florida's Constitution provides for four elected officials to oversee executive and administrative functions for each county (called "Constitutional Officers"): Sheriff, Property Appraiser, Supervisor of Elections, and Tax Collector. However, the current Constitution allows voters in home-rule counties (including Miami-Dade) to abolish the offices and reorganize them as subordinate County departments. Miami-Dade voters chose this option. The most visible distinction between Miami-Dade and other Florida counties is the title of its law enforcement agency. It is the only county in Florida that does not have an elected sheriff, or an agency titled "Sheriff's Office." Instead the equivalent agency is known as the Miami-Dade Police Department, and its leader is known as the Metropolitan Sheriff and Director of the Miami-Dade Police Department. The judicial offices of Clerk of the Circuit Court, State Attorney, and Public Defender are still branches of State government and are therefore independently elected and not part of County government.

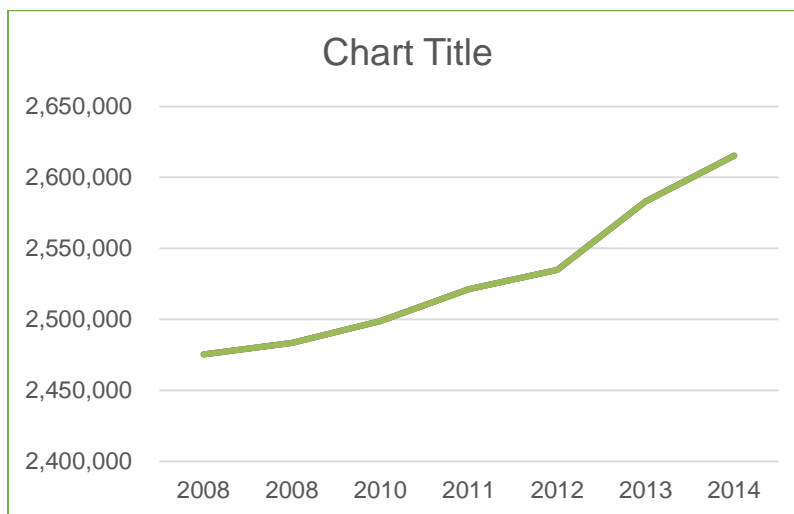
Fair Housing Implication(s): Fair Housing Implication(s):

Government officials should be sufficiently familiar with the fair housing laws and how those laws affect (or should affect) its programs/services and the impact on the jurisdiction. The receipt of federal financial assistance from U.S. HUD indicates the need for the governing body of the jurisdiction to receive training to ensure that the City's mandated obligation to affirmatively further fair housing extends to all housing and housing-related activities in its jurisdiction, whether publicly or privately funded. A formal cooperative structure by jurisdictions in Miami-Dade County would encourage area-wide solutions to fair housing problems. Municipalities should work together to ensure fair housing opportunities for all residents in Miami-Dade.

B. Population, Age, Race, Ethnicity

Population, age, race and ethnicity are important demand factors that influence choice and location within local housing markets. According to data derived from the Department of Health, Office of Health Statistics and Assessment, the County has grown steadily in the seven year period from 2008 to 2014. In 2008 the total population was 2,475,413 persons. In the seven-year period between 2008 and 2014, the population grew to 2,615,410 persons, an increase of 5.66 percent.

2008: 2,475,413
2009: 2,483,366
2010: 2,498,855
2011: 2,521,194
2012: 2,534,877
2013: 2,583,021
2014: 2,615,410



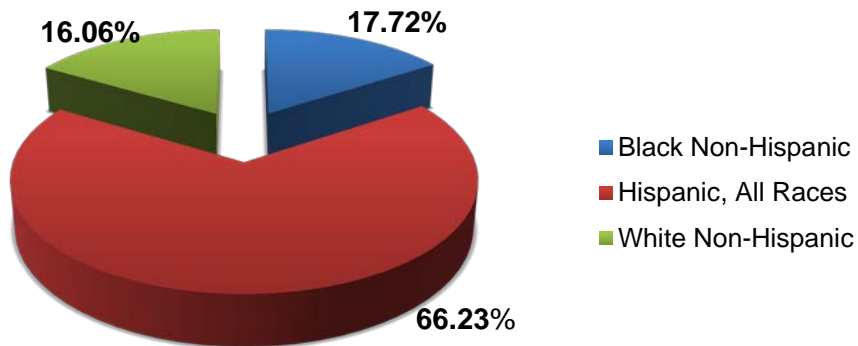
According to the Florida Department of Economic and Demographic Research, Miami-Dade's 2015 estimated population of 2,643,826 is expected to rise by an estimated 30,000 people over the next five years. According to the Shimberg Center for Housing Studies, which were based on 2000 and 2010 U.S. Census data and population projections by the Bureau of Economic and Business Research, University of Florida, the population of Florida will continue to grow, reaching an estimated 3,260,304 by 2040.

According to the Florida Department of Economic and Demographic Research, 2010 Census Counts and Projections of Florida Population, the County's population was 2,452,281 in 2010, and was projected to swell to 3,292,256 by 2040 with the Hispanic population increasing from 66.23% in 2010 to an estimated 77.41% by 2040. Likewise, the non-Hispanic Black population was estimated to increase from 15.39 to 17.72% and the White non-Hispanic population was estimated to decrease from 16.06 to 7.21% in this timeframe.

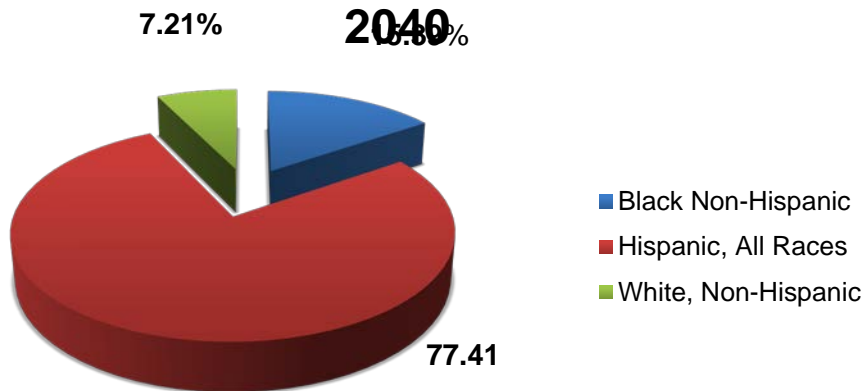
According to the ACS 2013 1-year data, the median county age was 39 years with 21 percent of the population under 18 years, 64% of the population from 18 to 64 years of age and 15 percent 65 years and older. County gender distribution was 51 percent female and 49 percent male. 2014 ACS 1-year Estimates showed a 6.5% increase in the total county population from 2009 to 2014. The percentage for those 19 years of age and younger decreased within total population for that 5-year period, but increased for all those 20 or older other than those in the 75 to 85 age bracket who showed a decrease of 0.8% during this period. The average age for the period went from 38.3 to 39.3.

April 1, 2010 Census Counts and Subsequent Year Projections, Miami-Dade County								
	2010	2013	2015	2020	2025	2030	2035	2040
All Races and Ethnicities	2,452,281	2,568,369	2,598,179	2,749,711	2,895,113	3,040,720	3,170,144	3,292,256
White, Not Hispanic or Latino	393,846	386,608	380,153	347,582	314,810	284,485	255,870	237,282
Black or African American, Not Hispanic or Latino	434,576	444,048	446,853	461,072	474,354	486,989	497,580	506,528
Hispanic or Latino of Any Race	1,623,859	1,737,713	1,771,173	1,941,057	2,105,949	2,269,246	2,416,694	2,548,446

Miami-Dade County Residents by Race and National Origin, 2010



Miami-Dade County Population by Race and National Origin, 2010



The US Census Bureau estimated the Miami-Dade 2010 population at 2,496,435 compared to the state of Florida at 18,801,310, representing a 6.67% increase in the county's population.

Miami-Dade County has one of the highest percentages of immigrants in the world. A total of 51.6% of the people living in the County in 2011 were foreign born. The ACS 2013 1-year reported that among people at least five years old, 71.6% spoke a language other than English at home, of whom 58% aged 5 to 17 and 64% aged 18 or older spoke Spanish. Of those aged 5 to 17, 34% spoke English compared to those aged 18 or older who spoke English, representing 27% of the population. The percentage of all ages who spoke Indo-European languages was 7% of the population. This often places a large percentage of the immigrant population at a disadvantage when seeking employment, contributing to the disparity in income between minorities and Non-

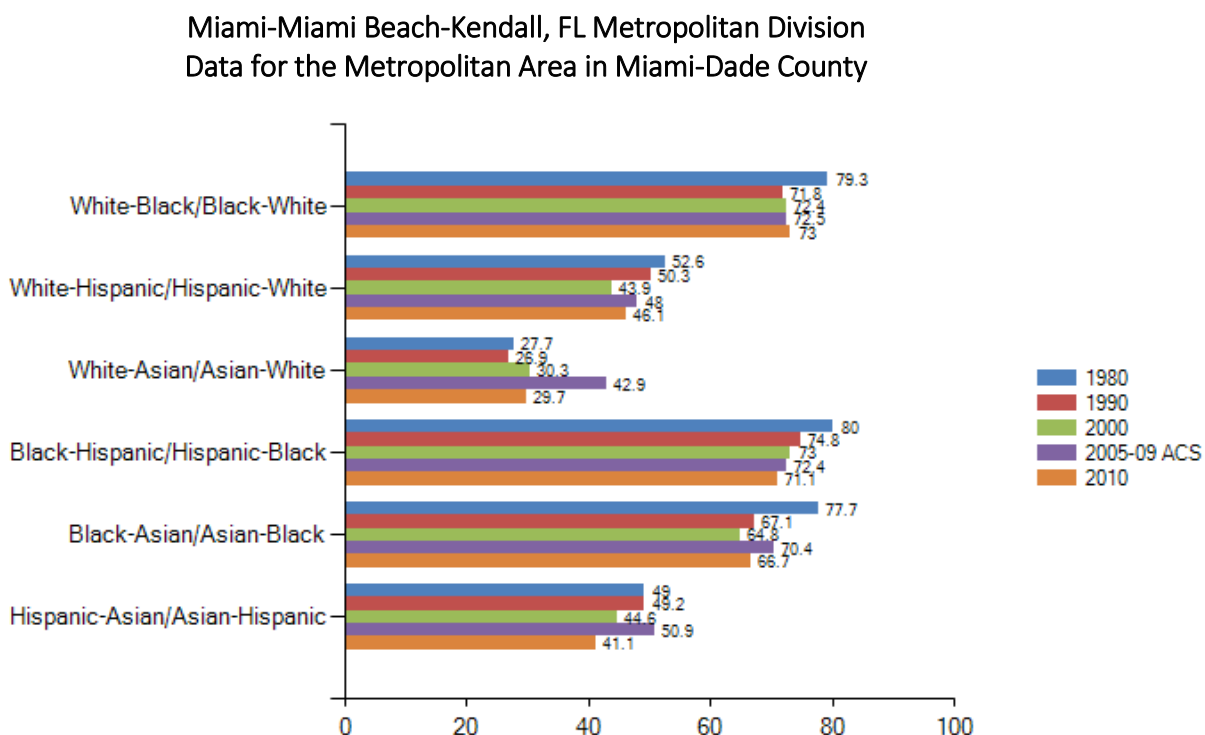
Hispanic Whites, which in turn affects their housing choices.

Fair Housing Implication(s):

The changes in population indicate the need for on-going fair housing educational efforts. The presence of a significantly diverse population and persons who are foreign born indicate the need for culturally competent, multi-lingual fair housing information and services.

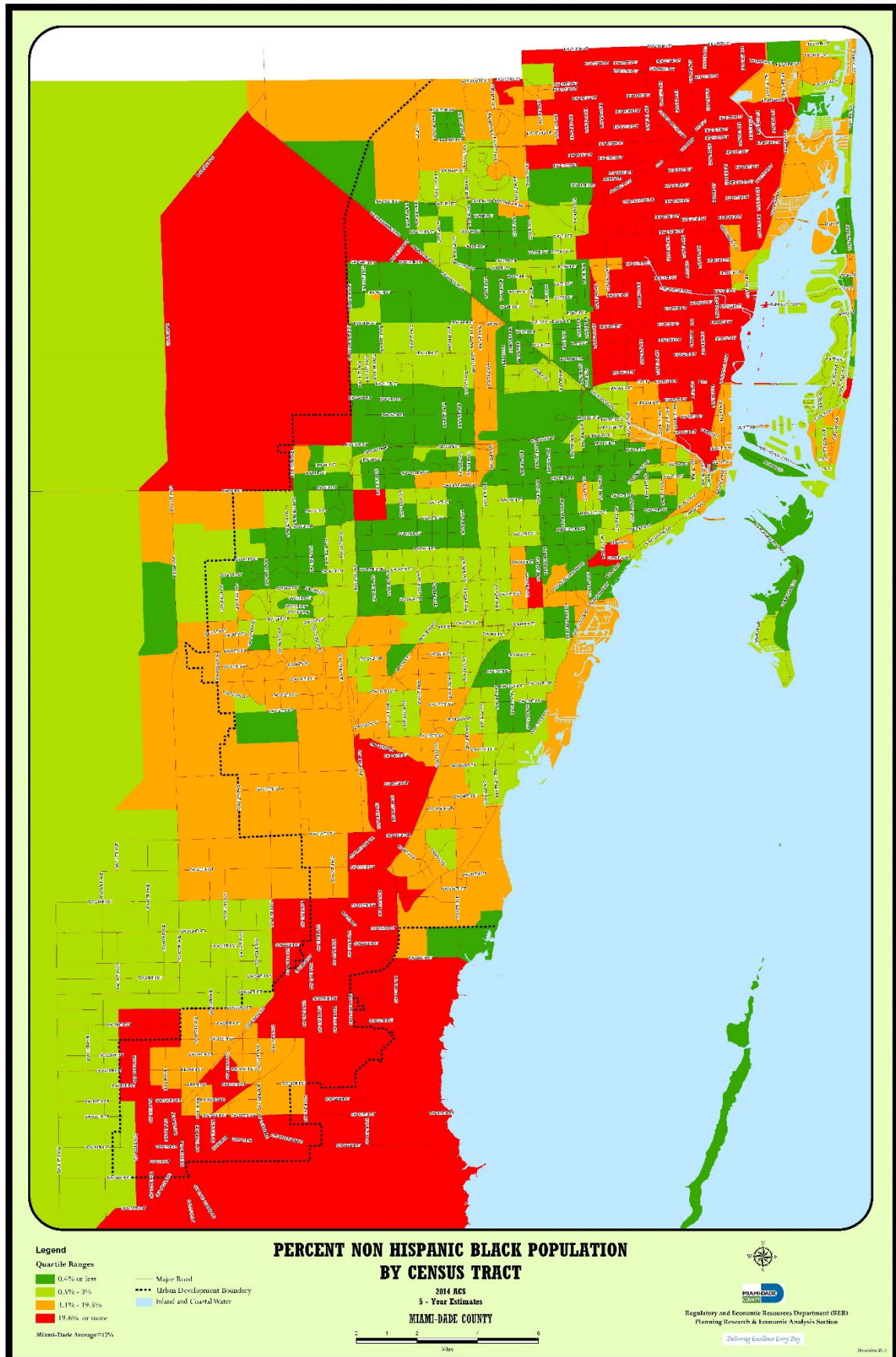
C. Geographic Segregation of Racial Groups

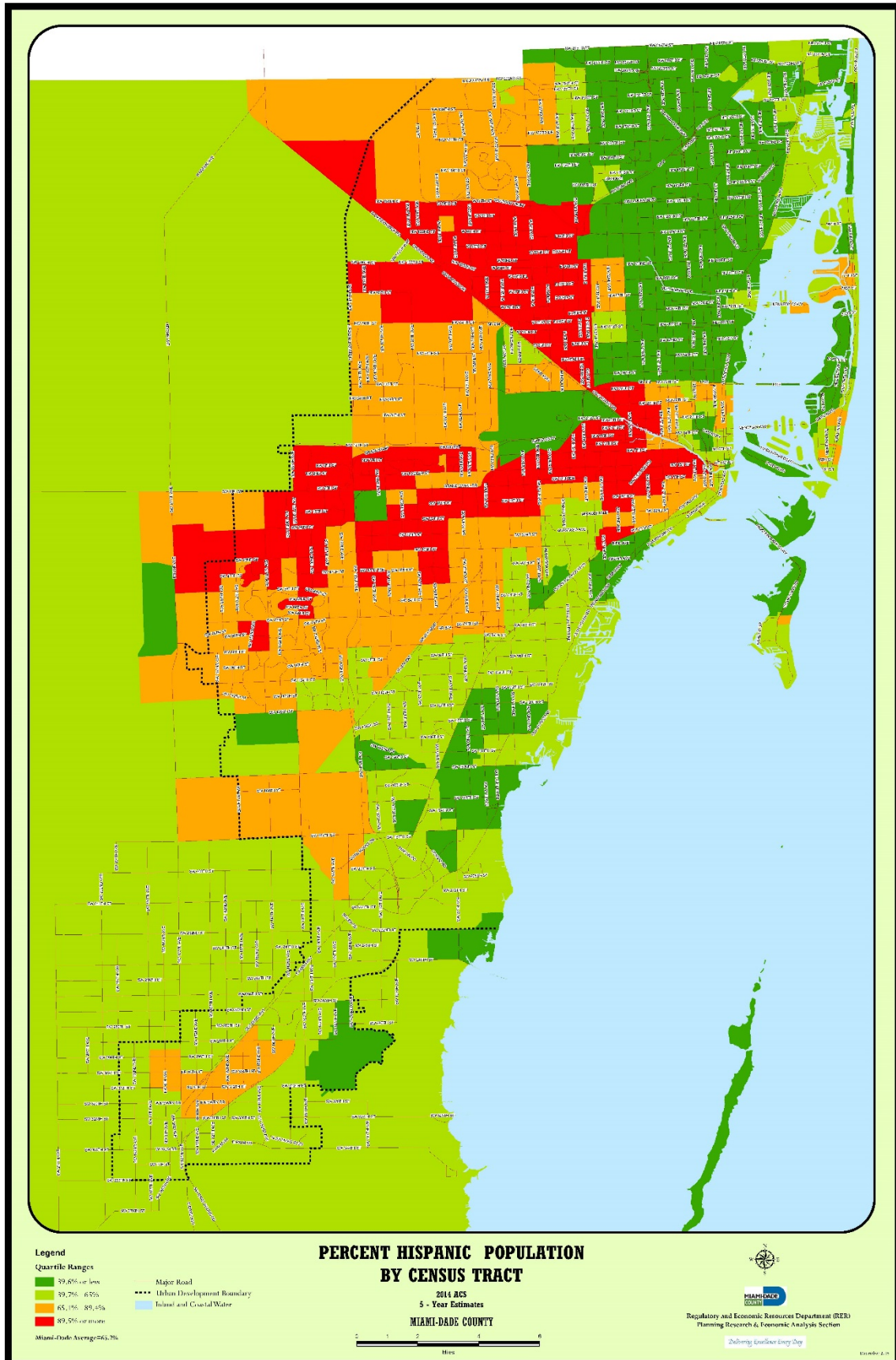
A tool utilized in measuring levels of segregation is the Dissimilarity Index, which indicates whether one particular group is distributed across census tracts in a metropolitan area in the same way as another group. The index assigns values that range from 0 to 100. A high value on an index of dissimilarity indicates that two groups tend to live in different census tracts. A value of 60 or higher is considered very high and that 60% or more of one group would have to move to a different census tract in order for the two groups to be equally distributed. Values of 50 to 40 are typically considered to be a moderate level of segregation. Values of 30 or below are considered to be fairly low levels of segregation. Levels of Black/White, Black/Hispanic, and Black/Asian segregation have remained very high from 1980 to 2010.

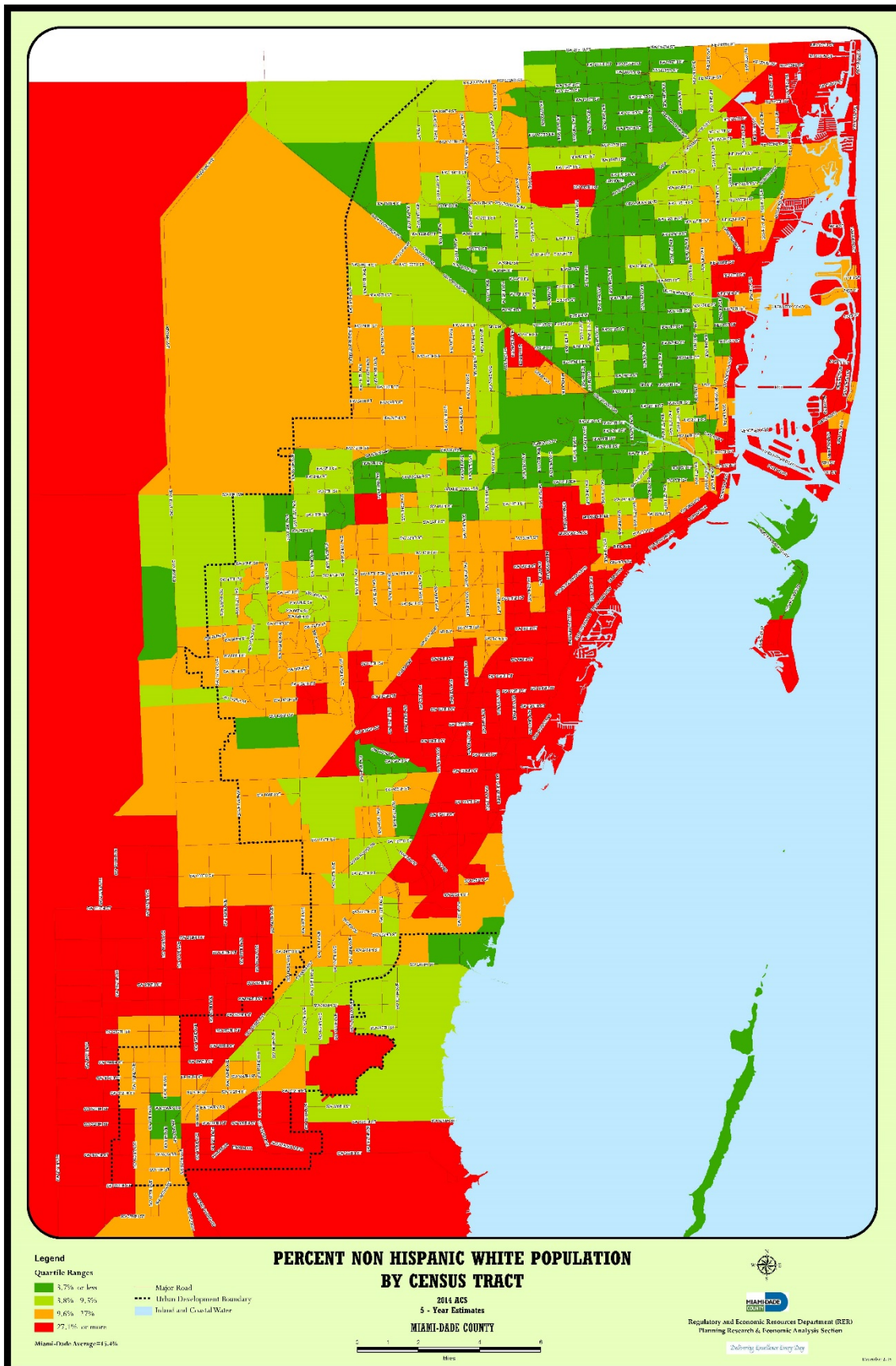


<http://www.s4.brown.edu/us2010/segregation2010/msa.aspx?metroid=33124>

According to the following maps from the Department of Planning & Zoning, many areas of the County have a diverse representation of races and ethnicities; however, Blacks appear to be clustered in the north- and southeastern portions of the county, with high concentrations in the areas of Liberty City, North Miami, Carol City, Overtown, Miami Gardens. Though well dispersed throughout the county, Hispanics primarily dominate the northwestern, central and southwestern portions with higher concentrations in Hialeah, Little Havana, Kendall.

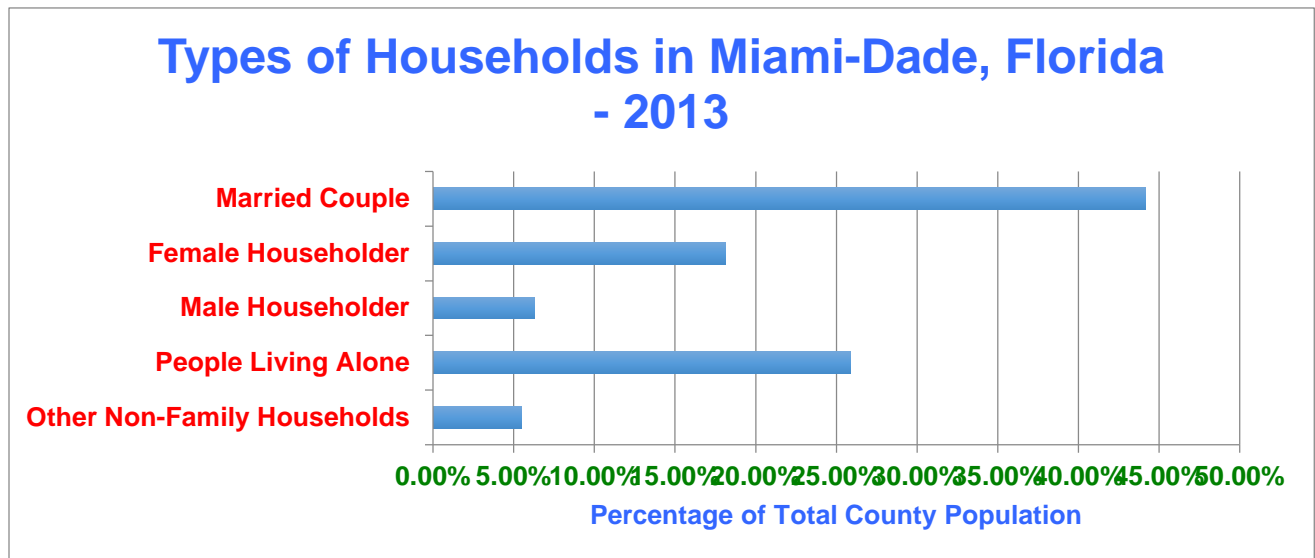






D. Household Characteristics

According to the 2009-2013 American Community Survey 5-Year Estimates, there were an estimated 828,031 households in Miami-Dade County in 2013 with an average household size of 3.02 people (compared to 827,556 households in 2010 averaging 2.88 people). Among the county's 828,031 households, family households represented 68.6 percent of all households, including: married-couple families (44.1 percent), male householder families with no wife present (6.3 percent), and female householder families with no husband present (18.1 percent). Nonfamily households made up 31.4 percent of all households, including people living alone (25.9 percent).



In 2010, the Hispanic/Latino population of any race was estimated to be 1,565,410 (64% of total) and grew to 1,653,390 (64.9%) in 2013. The Non-Hispanic, solely Black/African American population increased from 431,777 (17.7%) to 436,385 (17.1%) during the same period. The Non-Hispanic, solely White population grew from 389,318 (15.9%) to 396,762 (15.6%) from 2010 to 2013. These racial and ethnic groups have enormous impact upon the community because of their substantial numeric size and stable proportions within the general population.

Family households with children under the age of 18 diminished slightly from 2010 to 2013 ranging from 255,961 (30.9% of all households) to 246,976 (29.8%), respectively. Despite the slight numerical and proportional decrease within the general population, households with children continue to represent a significant segment of the county population.

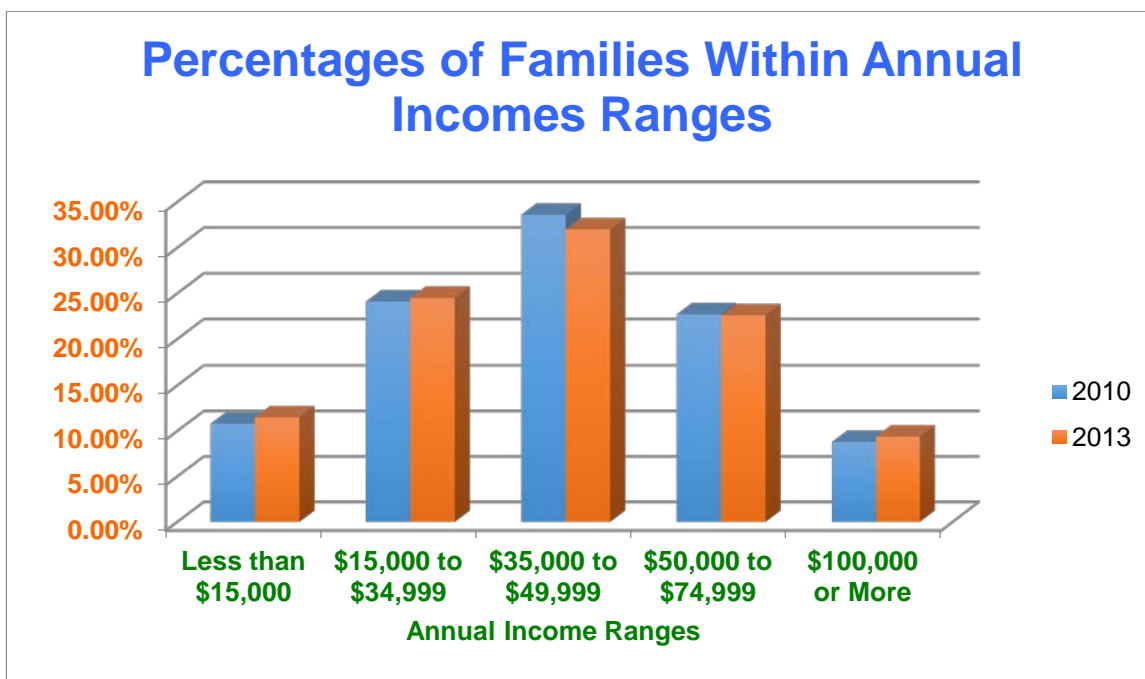
E. Income, Education, Employment

The financial stability and prosperity of Miami-Dade residents is an important factor that affects their ability to provide for their families and have a quality of life commensurate with their aspirations. Despite the fact that Miami-Dade County has had a continuous and vigorous economic

growth since 2000, there are still great pockets of poverty and an increase in income disparity making the cost of living unaffordable for low- and moderate-income earning households.

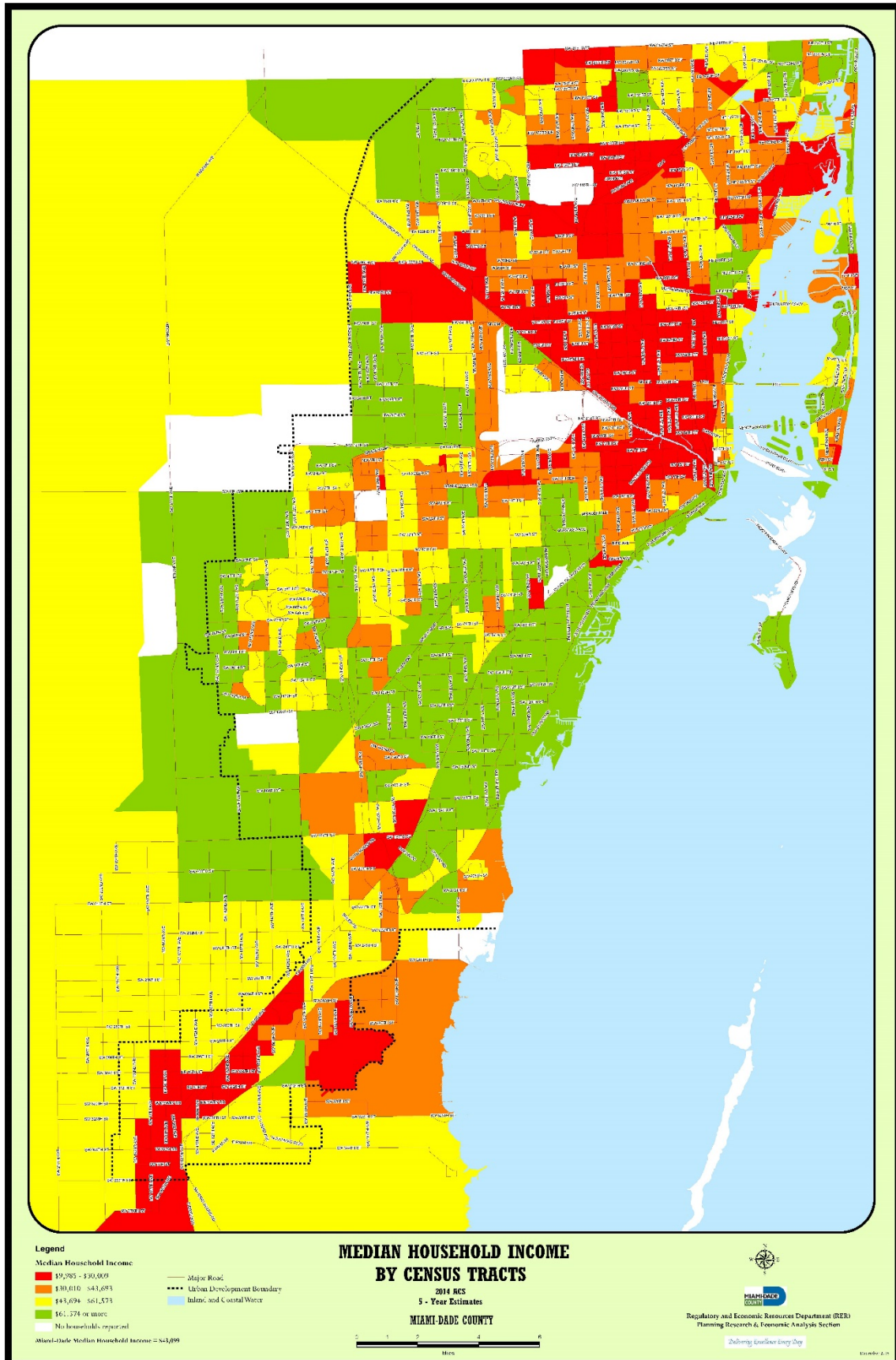
Income Characteristics

“Economic Characteristics” tables from the 2009-2013 American Community Survey 5-Year Estimates revealed that the percentage of families with annual incomes of less than \$34,999 increased from 2010 to 2013, percentages with incomes between \$35,000 and \$74,999 decreased, and the percentage of families earning more than \$75,000 increased during that period.



The Area Median Income figure (AMI) is released annually by HUD. It represents the estimated median income for a family of four. In 2015 the AMI for Miami-Dade County was \$49,900, representing a 10.4 percent increase over the 2007 median income of \$45,200. According to HUD guidelines, low-income households earn less than 80 percent of the area median income.

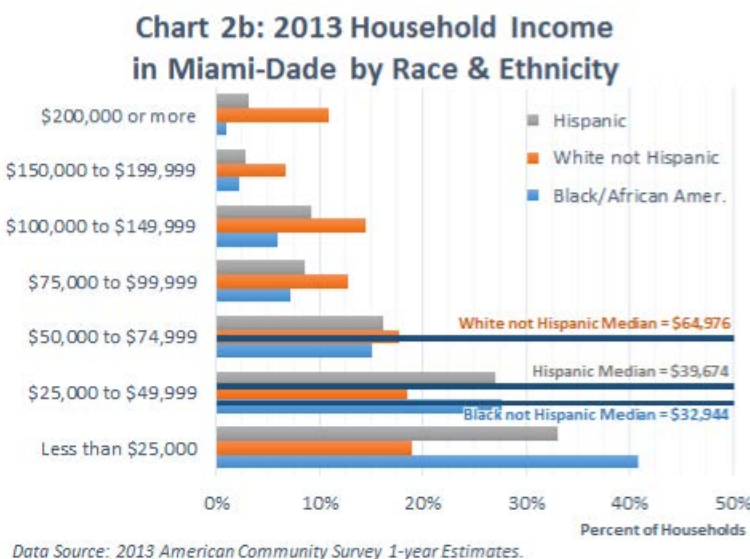
- Extremely Low-Income: At or below 30% AMI
- Very Low-Income: Between 31% and 50% AMI
- Low-Income: Between 51% and 80% AMI



The Florida Housing Data Clearinghouse reported the number of 2013 Miami-Dade households according to the following income categories: below 30%, 30.01-50%, 50.01-80%, and 80.01+% AMI.

Of 905,639 households, significantly 489,307 (54.03 percent) earned 80 percent or less of the AMI, placing the majority of county households in either low, very low or extremely low income category, while an additional 416,332 households (45.97 percent) earned more than 80 percent of the AMI.

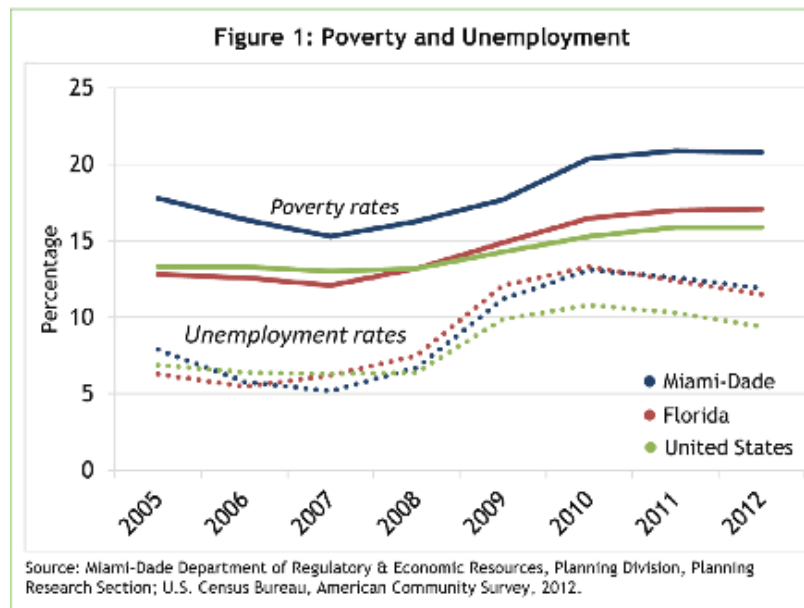
The Miami-Dade County Department of Regulatory and Economic Resources published a report entitled “Income & Poverty in Miami-Dade County: 2013”. As indicated in the following graph from that report, the percentages of Black and Hispanic households are much lower than the percentages of White, non-Hispanic households in the annual income ranges above \$50,000, with the gaps growing wider as incomes increase and with Black households lagging behind in all segments above \$50,000. At annual incomes below \$50,000, the percentages of White, non-Hispanic households are less than those of Black and Hispanic households with Blacks and Hispanics about equally represented in the population within the \$25,000 to \$49,999 range at about 27% of the population, but with Blacks lagging far behind Hispanic and White, non-Hispanic households at about 41% of the population as compared to 32.5% and 18% of the Hispanics and White, non-Hispanic households, respectively, earning less than \$25,000 annually.



The income and poverty report also indicated that the 2013 median income for Black, Hispanic and White, non-Hispanic households were \$32,944, \$39,674 and \$64,976, respectively.

In October 2013, the Miami-Dade County Department of Regulatory and Economic Resources, Planning Research Section, published an “At-A-Glance” report regarding poverty in the county. The report indicated that family and individual poverty rates increased 18.9 and 20.8%, respectively,

from 2010 to 2012. This was despite the fact that unemployment rates decreased during this period from 13.1 to 11.9%. The report illustrated this phenomenon with the following chart:



The chart also illustrated that county poverty rates have continued to be in excess of state and national rates and that unemployment rates have been on par with state-wide rates and in excess of national rates.

Educational Attainment

One of the most important determinants of financial success and quality of life is educational attainment as it affords residents the likelihood of holding better paying jobs and being able to provide for themselves and their families. Additionally, early education allows for the integration of children and youth into society and provides a pathway for their future development.

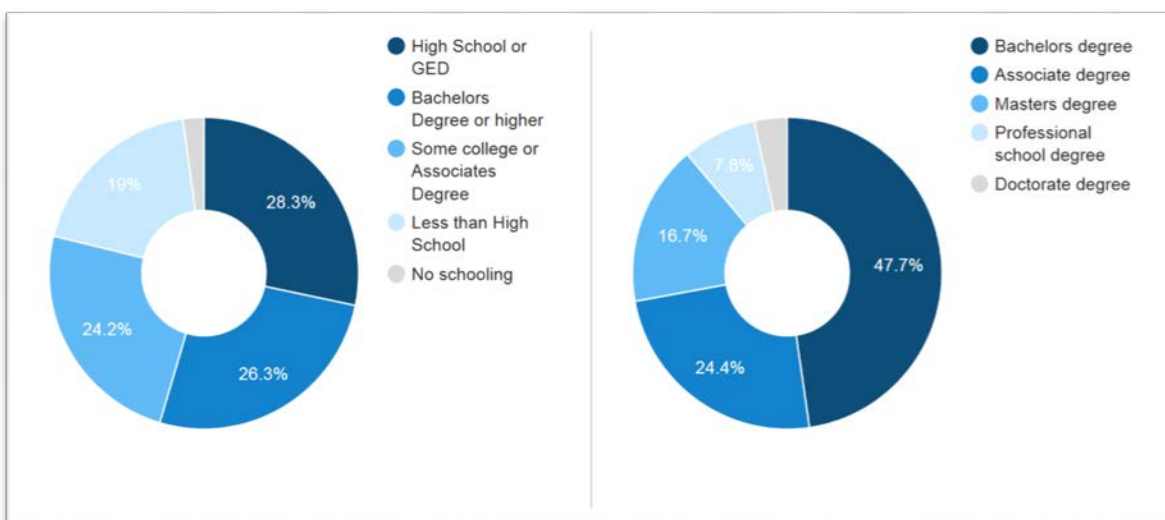
According to the TownCharts website (derived from the 2014 American Community Survey, 2013 Data), the total 2013 school enrollment in Miami-Dade was 646,306 with 5% in kindergarten, 20% in grades 1-4, 20% in grades 5-8, 21% in grades 9-12, 28% in undergraduate school and 6% in graduate or professional school.

According to U.S. Census Bureau, Statistical Abstract of the United States, 2012, the Miami-Dade County school district was the largest school district in Florida and the fourth largest in the nation, with an active student enrollment of 345,525 as of spring 2008, 22,384 active full-time teachers and 496 schools.

An interactive graphic website presented by the Miami Herald entitled “The changing demographics of Miami-Dade schools” reported that for the years 2013-2014, the enrollment in

Miami-Dade public schools was 7.6% White, 22.8% Black, 67.6% Hispanic and 2.0% Other. Comparatively, for the 2001-2002 years, with an enrollment of 374,000, the public school enrollment was 10.7%, 30.2%, 57.8% and 1.3% for White, Black, Hispanic and Other students, respectively, evidencing decreasing proportions of Black and White students and increasing proportions of Hispanic and Other students.

Based on the 2014 American Community Survey, 2013 data, Town Charts also reported that, of residents aged 25 or older, 2% had received no schooling, 19% had gotten less than a high school education, 28% earned a high school diploma or GED, 24% attended some college or attained an Associate's Degree, and 26% had achieved a Bachelor's Degree or Higher. Of those aged 25 or older having higher education, 24.4% had Associate's, 47.7% had Bachelor's, 16.7% had Master's, 7.8% had professional school, and 3.4% had Doctorate degrees.



Town Charts – Miami-Dade County, Florida Education Data

The demographic data reported by Town Charts indicated that 20.4% of the White, 24.5% of the Black, 29.9% of the American Indian, 13.7% of the Asian, 5.3% of the Native Hawaiian and 24.4% of the Hispanic population who were 25 years of age or older in Miami-Dade County had achieved less than a high school diploma. The website reported that 27.5% of the White, 34.0% of the Black, 24.1% of the American Indian, 15.1% of the Asian, 30.3% of the Native Hawaiian and 29.4% of the Hispanic population completed high school received a GED. The source reported that 23.6% of the White, 26.7% of the Black, 29.2% of the American Indian, 21.5% of the Asian, 62.5% of the Native Hawaiian and 23.0% of the Hispanic population completed some college or Associate's degree. Finally, 28.5% of the White, 14.8% of the Black, 16.8% of the American Indian, 49.3% of the Asian, 2.0% of the Native Hawaiian and 23.2% of the Hispanic population achieved a Bachelor's degree or higher.

Education	White	Black	American Indian	Asian	Native Hawaiian	Hispanic
Less than high school diploma	20.4%	24.5%	29.9%	13.7%	5.3%	24.4%
High school graduate or GED	27.5%	34.0%	24.1%	15.5%	30.3%	29.4%
Some college or associates degree	23.6%	26.7%	29.2%	21.5%	62.5%	23.0%
Bachelors degree or higher	28.5%	14.8%	16.8%	49.3%	2.0%	23.2%

Town Charts – Miami-Dade County, Florida Education Data

F. Transportation

Transportation moves people and creates the necessary connection that create economic opportunities. Transportation into, out of, and throughout Miami-Dade County is primarily achieved through a well-developed network of roadway transportation corridors. Major highways traversing the County include the Florida Turnpike and Interstate 95, 195, 395, along with approximately 20 Florida State Roads, several “expressways” and a grid system of arterial surface streets.

Miami-Dade Transit (MDT) is the 15th largest transit system in the United States, with a service area that covers approximately 306 square miles. It is composed of 34 individual municipalities with an urbanized population of approximately 2.6 million. A trend persists in some areas throughout the county to incorporate, which leaves a large portion of the county populated by disadvantaged individuals in unincorporated areas that are totally dependent upon county services.

The accessible, fully integrated system has 4 transportation modes: Metrobus, Metrorail, Metromover, and Paratransit. With 893 ADA compliant buses and over 100 routes travelling over 29 million miles per year, Metrobus connects with Metrorail and Metro Mover with seven routes operating 24 hours a day. The bus network provides service throughout Miami-Dade County 365 days a year, connecting to parts of southern Broward County to the north and Monroe County to the south as well.

Approximately 60% (5,580) of the 9,300 bus stops are wheelchair-accessible. Customers who use wheelchairs or mobility aids have the right to board and exit Metrobus first. The lift permits both inboard and outboard facing of customers who use wheelchairs and mobility aids.

Metrorail is a 22.6 mile elevated, heavy rail system with approximately 136 vehicles and 22 stations, providing easy access for bus riders, pedestrians and passengers. Metrorail runs from Kendall (south) to downtown and northwest through Brownsville, Liberty City, Hialeah and Medley, with connections to Broward and Palm Beach counties at the Tri-Rail/Metrorail transfer station. Ten (10) out of the 22 Metrorail stations are readily accessible to and usable by individuals with disabilities including customers who use wheelchairs or mobility aids: Dadeland South, Dadeland North, South Miami, Douglas Road, Brickell, Government Center, Civic Center, Dr. Martin Luther King Jr. Plaza, Tri-Rail, Okeechobee and Palmetto.

Metromover, a free downtown people mover system, is a 4.4 mile elevated system via an automated guideway with 21 stations.

Special Transportation Services (STS) is a shared-ride service of Miami Dade County (MDC) provided in compliance with the provision of the US Department of Transportation (DOT) Americans with Disabilities Act (ADA) Complementary Paratransit Service rules. STS can be used through most urbanized Miami-Dade County, Monroe County, and some parts of southern Broward County without restrictions or priorities based on trip purposes.

STS operates seven days a week, 24 hours a day. It provides door-to-door transportation for persons with disabilities or mobility impairments who are unable to use accessible Metrobus, Metrorail or Metromover.

The service has been offered to residents since 1976, preceding the ADA mandate. Residents with temporary disabilities may also be eligible for this service too. All fares are affordable or at no cost for qualified individuals. Reduced fares are available to Medicare recipients, people with disabilities and Miami-Dade students in grades 1-12.

All Miami-Dade senior citizens aged 65 years and older and with Social Security benefits ride free with a *Golden Passport* pass. Veterans residing in Miami-Dade and earning less than \$22,000 annually ride free with the *Patriot Passport* pass. The public transportation system favorably affects mobility throughout the County, especially for low-income persons, enhancing fair housing choice.

http://www.miamidade.gov/transit/library/10_year_plan/2015-transit-dev-plan-fy-2014-2023/ch-2-mdt-tdp-exsiting-services-overview.pdf

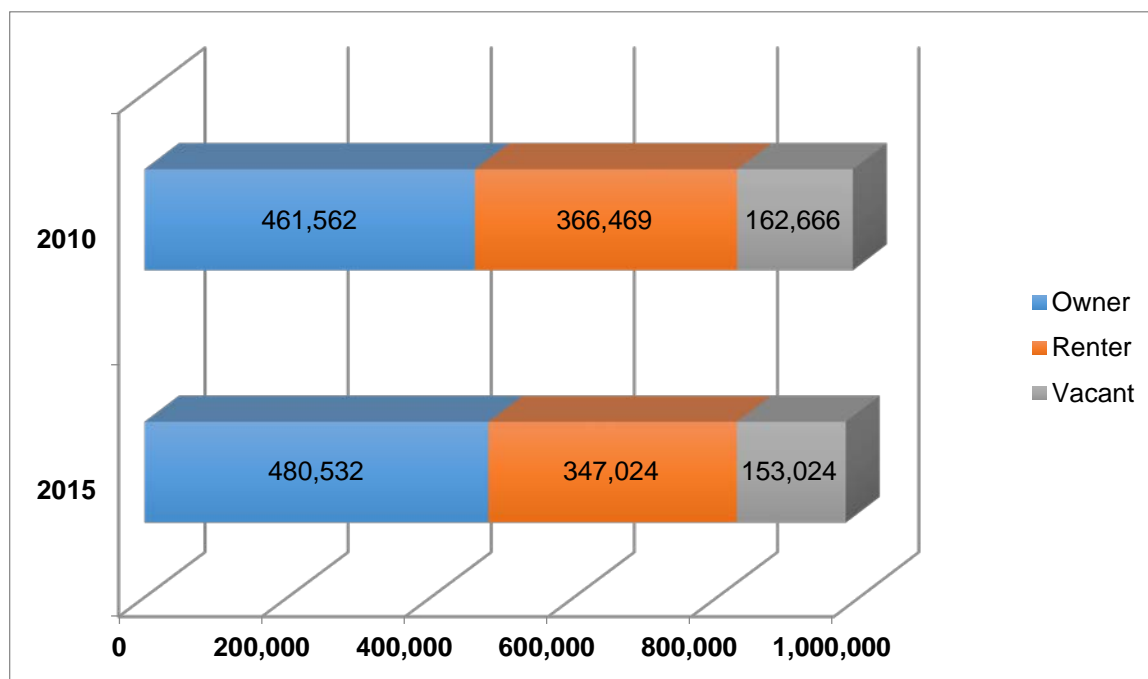
Source: Miami-Dade Transit Office of Civil Rights and Labor Relations

III. Housing Profile

A. Housing by Tenure

According to the 2009-2013 American Community Survey 5-Year Estimates, there were 980,580 housing units in Miami-Dade County in 2010. By 2013, the number had grown to an estimated 990,697, reflecting the growth in population. Yet, approximately 162,666 units were vacant by 2010, nearly 10,000 more vacancies than in 2010 when 153,024 units were vacant. Of the 980,580 occupied units in 2013, 461,562 were owner-occupied and 366,469 were renter-occupied. This reflects a decrease in the rate of homeownership and a corresponding increase in the rental tenure from 2010 to 2013.

**Total Housing Units by Tenure and Vacancy, Miami-Dade County
2010 & 2015**



Source:

U.S. Census Bureau, 2009-2013 American Community Survey 5-Year Estimates

B. Housing Affordability

According to the Florida Housing Data Clearinghouse website, a “cost-burdened” household is one paying more than 30% of its income for rent or mortgage costs. Homes are unaffordable if households are cost burdened. The clearinghouse website indicates that 495,052 Miami-Dade households were cost burdened in 2013. The percentage of cost burdened households in the county (55%) in 2013 was greater than the statewide percentage (43%). Of the 495,052 households paying more than 30% of their incomes on housing, 218,518 (24.13% of total households) paid 30 to 50% of their income and 276,534 (30.53%) paid more than 50% of their

income on housing. Of all households who were homeowners, 28.55% spent less than 30% of their income on housing, 12.56% spent 30 to 50% of their income on housing, and 14.72% spent more than 50%. Of households who were renters, 16.79% spent less than 30% of their income on housing, 24.13% spent 30 to 50 of their income and 15.81% spent more than 50% of their income on housing. Of all homeowners (505,599), 48.87% (247,084) spent more than 30% of their income on housing. Of all renters (400,040), 61.99% (247,968) spent more than 30% of their income on housing. A greater percentage of renters, as a group, wrestle with housing cost burden than homeowners, as a group.

Households by Homeowner/Renter Status and Cost Burden Miami-Dade County, 2013 (Numerical and Percentage of Total Population)				
	0-30%	30-50%	More than 50%	Total by Tenacy
Owner	258,515 (28.55%)	113,742 (12.56%)	133,342 (14.72%)	505,599 (55.83%)
Renter	152,072 (16.79%)	104,776 (11.57%)	143,192 (15.81%)	400,040 (44.17%)
Total	410,587 (45.34%)	218,518 (24.13%)	276,534 (30.53%)	905,639

Florida Housing Data Clearinghouse, 2015

The annual area median income (AMI) for a family of four, as estimated by US HUD, is \$49,990 in 2015. Households whose incomes are less than 30% of the AMI are considered to have extremely low, those with incomes more than 30% to 50% are very low, and those from above 50% to 80% of the AMI are low income households. As illustrated in the table below, 86.87% (157,262) of all 181,038 households with extremely low income, 83.01% (116,448) of all 140,278 very low, and 65.26% (109,663) of all 167,991 low income households are cost burdened. Conversely, 26.82% (111,679) of all 416,332 households with greater than 80% of AMI are cost burdened as defined by paying 30% or more of their income for housing costs. This data shows that as AMI decreases, a greater percentage of households in a given income category are cost burdened.

Households by Income and Cost Burden, Miami-Dade County, 2013					
Household Income as a Percentage of Area Median Income	Amount of Income Paid for Housing				
	0-30%	30-50%	50% or more	30% or more	Total
<=30% AMI	23,776	20,586	136,676	157,262	181,038
30.01-50% AMI	23,830	43,548	72,900	116,448	140,278
50.01-80% AMI	58,328	67,116	42,547	109,663	167,991
80.01+% AMI	304,653	87,268	24,411	111,679	416,332
Total	410,587	218,518	276,534	495,052	905,639

Florida Housing Data Clearinghouse, 2015

C. Housing Needs of Disabled Persons

The 2009-2013 American Community Survey 5-Year Estimates indicated that in 2013 there were 2,515,873 people in the Miami-Dade County non-institutionalized population, of which 257,696 or 10.24% were people with disabilities.

The Miami-Dade County Entitlement Area Consolidated Plan, Fiscal Years 2013 through 2017, highlighted the fact that people with disabilities are particularly impacted by “worst case housing needs.” HUD’s “Worst Case Housing Needs, 2015 Report to Congress” defines worst case housing needs as “renters with very low incomes – below 50 percent of the Area Median Income (AMI) – who do not receive government housing assistance and who pay more than one-half of their income for rent, live in severely inadequate conditions, or both”. The HUD report also indicated that nationwide in 2013, about 14% of renters with worst case needs were nonelderly people with disabilities. The report added that such people with disabilities with worst case needs represent 1.1 million US households. Also, although there were 17% fewer such households in 2013 as in 2011, the 2013 numbers were still 10% above 2009 estimates. The consolidated plan explained that people with disabilities are more subject to worst case housing needs because “(d)isabilities can reduce employment options and make it more difficult to find suitable housing at a reasonable cost.” The plan also indicated that the prevalence of worst case needs averages 38.2% among very low-income, nonelderly people with disabilities.

D. Homelessness

The results of the semi-annual “Point In Time” (PIT) homeless census, led by the Miami-Dade County Homeless Trust, conducted on January 22, 2015, identified a total of 4,152 sheltered and unsheltered homeless in the County compared with 4,156 counted in 2014 at the same time. Shifts can be seen in where the homeless population resides: there were 3,145 people in shelters in 2015 compared with 3,316 in 2014, but more were counted on the streets this year, 1007 in 2015 compared with 840 in 2014. Although officials have not been able to pinpoint one reason for the increase in the street homeless population, many variables can contribute to such increases such as weather in other parts of the U.S.

The Homeless Trust organizes and directs the Miami-Dade County Homeless Plan. Created by Miami-Dade County Ordinance 94-66, the Trust was formed to: 1) to administer proceeds of a unique one-percent food and beverage tax dedicated to homeless and domestic violence services (85% of the funds toward homeless and 15% toward domestic violence services); 2) to implement the local continuum of care plan, a three-phased plan, called the Miami-Dade County Community Homeless Plan (the “Plan”); and 3) to serve in an advisory capacity to the Board of County Commissioners on issues involving homelessness. The Trust is not a direct service provider. Instead, it is responsible for the implementation of policy initiatives developed by the 27-member Miami-Dade County Homeless Trust Board, and the monitoring of contract compliance by agencies contracted with the County, through the Trust, for the provision of housing and services for homeless persons.

The Trust created a plan that creates three phases of housing (emergency, transitional, and permanent). The plan for the development of 1,000-1,500 emergency housing beds at Homeless Assistance Centers, 750 transitional housing beds, and the placement of 4,600 homeless men, women, and children into permanent housing. As of January of 2011, the trust has 1,593 emergency beds, 1,878 transition beds, and 2,984 permanent housing units. According to the Homeless Trust, 44% of the homeless population in Miami-Dade County is African American and 30% are Hispanic. Based on the most recent Area Median Income figures for Miami-Dade County from the US Department of Housing & Urban Development, households living on yearly income of \$15,780 and below are considered extremely-low income (ELI), and those with annual income of \$26,300 are considered very-low income (VLI). The most recent U.S. Census Bureau data show that 157,000 of Miami-Dade County’s 810,000 households subsist on annual incomes of less than \$15,000 per year and another 107,000 households live on income between \$15,000 and \$25,000 per year. These Census numbers can thus be used as a rough estimate of the number of ELI and VLI households in Miami-Dade County.

As shown above, none of the ELI households in Miami-Dade County are able to afford the fair market rent of over \$800 per month for an efficiency apartment, let alone a one or two bedroom. Even VLI households are not able to afford an efficiency apartment, let alone a one bedroom, in Miami-Dade County at fair market rents. Households with income of \$26,300 per year can only

afford \$657 in monthly rent, while the fair market rent for an efficiency apartment is \$819, and that of a one bedroom is \$927. These households also struggle with meeting other expenses (food, utilities, health care etc.) in order to stay current with their rent, and are at risk of becoming homeless.

In Fiscal Year 2014-2015, the Homeless Trust had 1,858 emergency beds. The Trust has 1,836 transitional beds. The number of transitional beds has been decreasing due to strategic reallocation of non-treatment and ineffective transitional housing to permanent housing. The Trust also has 4,439 permanent units and 381 HPRP beds. In all housing levels (Emergency, Transitional and Permanent), the Trust has more housing units than originally planned.

The Miami-Dade County Homeless Trust obtained permission to utilize 52 acres of undeveloped property to serve as a unique project serving homeless families. More than 600 individuals moved into the project in June 2011. The project contains 145 units of permanent supported housing (housing with services) for homeless/formerly homeless families. It features a landscape/produce nursery and a fresh market retail complex, which serves as a micro-enterprise for the residents. Residents of the Verde Gardens complex will enjoy amenities that provide a sense of community, including open public plaza areas, a basketball court, a community center and children's play area, and a soccer field to the north of the central plaza area. Residents pay 30% of income toward rent with leases renewed on an annual basis.

Miami-Dade County Homeless Plan (Updated December 6, 2013)

<http://www.homelesstrust.org/library/2014-homeless-plan.pdf>

<http://www.homelesstrust.org/releases/2015-02-05-post-census.asp>

E. Public Housing & Assisted Housing

Miami-Dade Public Housing and Community Development (PHCD) administers several programs in order to make decent, affordable housing opportunities to County residents:

Public Housing Program

In Miami-Dade County, public housing is limited to low-income families and individuals, with 40 percent of the units targeting households earning less than 30 percent of the area median income. In all, there are approximately 9,300 family and elderly units.

PHCD administers a HUD-funded project-based rental program with over 9,200 public housing units in i100 family and elderly developments in Miami-Dade County. PHCD also manages several mixed-income housing developments charging rent to low-income families that can afford to bear some of the costs of housing. Overall, the agency oversees the administration of over 28,000 units of Public Housing and Private Rental Housing.

Public housing is intended for extremely low-income, elderly or disabled residents. Residents who need housing assistance must first apply for public housing. Applications for public housing are available only during the periods of open registration. Once eligibility is determined, applicants are then placed on a waiting list compiled using a lottery-like system and are assigned a rank for public housing, the Section 8 Housing Voucher program, assisted living facilities and moderate rehabilitation housing.

PHCD continues processing a community-wide waiting list established in 2008 with each applicant assigned two ranking numbers; one for Project-Based Programs and another for Tenant-Based Programs. PHCD received 28,362 pre-applications for the Public Housing Program during a twelve day registration period from September 8-19, 2014.

Section 8

- Housing Choice Vouchers

The Section 8 program is comprised of 15,253 allocated Housing Choice Vouchers (including 204 Veterans Affairs Supportive Housing) and 2,097 Moderate Rehabilitation project based units. Additionally, PHCD administers 987 units under the Single Room Occupancy (SRO) Section 8 Moderate Rehabilitation Program and Stewart B. McKinney Act Shelter Plus Care Program, targeting assistance to disabled homeless individuals with mental illness, substance abuse and/or HIV/AIDS. The Section 8 Housing Choice Voucher allows recipients (restricted to low income households) to choose their unit in the private housing market. Participants typically pay between 30% and 40% of income toward rent; the landlord receives the difference in the form of a housing assistance payment from PHCD.

Public Housing uses GoSection8 to assist with housing searches. GoSection8 provides a user friendly way to list rental properties online. Listings are available to potential Housing Choice Voucher participants who are seeking apartments, duplexes, single family homes or townhomes in the private market.

- Section 8 Moderate Rehabilitation Program

In the Section 8 Moderate Rehabilitation Program, very low-income households are provided affordable rental housing in privately-owned, multifamily buildings through a HUD-funded project-based rental assistance program. Assistance is limited to properties previously rehabilitated pursuant to a housing assistance payments contract between an owner and a public housing agency. Unlike the voucher program, assistance is tied to the unit, not the individual. Altogether, there are 2,508 units in 48 locations. HUD-funded project-based rental assistance program with 2,030 units for low income families. PHCD manages the wait list for this program. PHCD received 17,916 pre-applications for the Moderate Rehabilitation Program during an eight-day registration period from July 14-21, 2014.

- Section 8 New Construction & Substantial Rehabilitation Program

The Section 8 New Construction Program is a HUD-funded, project-based program with 536 offers units in newly constructed or rehabilitated buildings to very low income households. PHCD has authorized a private management firm to provide property management services and the site-based wait list is opened as needed.

- Homeownership Program for Housing Choice Voucher Recipients

PHCD's Section 8 Homeownership Program is a voluntary program designed to permit eligible Housing Choice Voucher recipients to purchase a home using the voucher subsidy, approved by the Miami-Dade Board of County Commissioners in December 2001. The goal of the program is to provide homeownership opportunities, along with counseling, self-sufficiency, training and support, thereby facilitating economic opportunity within communities while providing parameters to ensure the success of the homebuyer. Currently there are 163 families in the program.

Miami-Dade County's Section 32 Homeownership Program offers twenty-seven single family homes in the Naranja and Homestead for qualified families interested in owning their own homes. This homeownership program offers Public Housing residents, Section 8 residents and low-income residents to become first-time homebuyers.

Special Needs Programs

In conjunction with its nonprofit partners, PHCD administers numerous programs that target special needs groups, including the Shelter Plus Care Program, Moderate Rehabilitation Single Room Occupancy (SRO) Program, Veterans Assisted Supportive Housing Program, Assisted Living Facilities for the Elderly, and HOPWA-Supported Housing.

Family Self-Sufficiency Program

The Family Self-Sufficiency Program, administered by PHCD, provides job training, education, employment placement and other supportive services to Section 8 and public housing residents to help them reach and maintain economic independence.

Other Programs

- Scott/Carver HOPE VI Exclusively for former HOPE VI residents of Scott and Carver Homes who resided in Scott or Carver Homes as of September 16, 1999 and ranked through a computerized lottery system. The Scott/Carver returning residents list opened since November 2010.

PHCD received a HOPE VI revitalization grant in 1999 for Scott/Carver Homes, development (project) number: FL29P005004/FL29P005020. Phase 1 was completed by Habitat for Humanity in 2008 which provided 57 new homes. Phase 2 was completed in 2012 and provided a total of 354 rental units composed of 177 public housing (ACC) units, 107 low and moderate income (tax credit) units and 70 market rate units. Phase III and IV were also part of the revitalization plan, but

due to substantial soil contamination at the only large remaining site (the site), 7200 NW 22 Ave, PHCD will seek a revision to the Revitalization Plan to utilize the remaining HOPE VI grant funds to undertake environmental remediation of the site.

- Section 8 New Construction (S8NC) S8NC developments are privately managed.
- Homeless A pilot program for persons experiencing homelessness will consist of referrals from a homeless organization. This program will initially be limited to a maximum availability of 25 Public Housing units that may be expanded if the program is successful.

Accessibility

Miami-Dade Public Housing and Community Development (PHCD) is committed to comply with the requirements under Title II of the Americans with Disabilities ACT (ADA) and Section 504, by providing reasonable accommodation on its housing programs and services to persons with disabilities.

A reasonable accommodation is a change, modification, alteration or adaptation in policy, procedure, practice or program of a housing facility that provides a qualified individual with a disability the opportunity to participate, or benefit from, a housing or non-housing program or activity.

PHCD is actively engaged in developing accessible housing for persons with disabilities through the modification and development of housing facilities and other services.

In accordance with HUD's Equal Access Rule and PIH Notice 2014-20 and the policies of Miami-Dade County, PHCD has revised its definition of "family" to provide equal access regardless of actual or perceived sexual orientation, gender identity, gender expression or marital status. If a complaint is received, PHCD will determine if a program violation has occurred and implement appropriate corrective actions.

Applicants and residents receive documents at move-in and annual recertification that advise them about their disability-related rights. PHCD provided fair housing training to staff on March 23-24, 2011.

Fair Housing Implication(s):

Publicly funded or subsidized housing opportunities required that such opportunities be affirmatively marketed to ensure availability to residents of all communities in appropriate languages and formats for accessibility.

F. Housing Programs

Affordable Housing

Miami-Dade County has provided funding to developers to build and/or rehabilitate housing in our community. The owners of these properties maintain their own waiting list and application requirements. (online list)

Workforce Housing Program

On October 6, 2015, the Miami-Dade County Board of Commissioners adopted Resolution No. [R-890-15](#) creating the Implementing Order No. 3-60 for the administration of the workforce Housing Program. The Workforce Housing Development Program will assist in providing affordable housing to individuals and families of moderate income, particularly those whose earnings range from 65 percent to 140 percent of the County's median income. This is the income definition for the targeted workforce population under the Workforce Housing Ordinance. PHCD will oversee the administration of this program.

PHCD's Mixed Income Properties

Portfolio of mixed-income affordable communities which accept onsite applications. PHCD has six properties that have a total of 727 units. Only 3 units are 4 bedroom units and only 40 are 3 bedroom units. The majority (636) are 2 bedroom units. There are 48 studio/efficiency units.

Miami-Dade Housing Finance Authority

- Affordable Rental Housing

Listing of affordable rental housing through HFA's Multifamily Rental Program, Developers of multifamily housing receive low interest rate loans to produce new or rehabilitated housing and agree to provide rents at affordable rates for persons of low and moderate income. The list of 29 affordable rent properties includes 9,306 units. Units with 2 and 3 bedrooms make up 72.4% of the total number of units, however, there are some limitations for larger families with only 2.5% (232 units) of the total units being 4-bedroom units.

- Multifamily Mortgage Revenue Bond Program

Through our Multifamily Mortgage Revenue Bond (MMRB) Program we provide low interest rate loans to developers who produce new or rehabilitated housing units for low, moderate and middle income families who desire to rent in Miami-Dade County.

Neighborhood Stabilization Program

The County acquired 50 single family homes for the Neighborhood Stabilization Program and has sold 45 homes to date. Only a few homes are currently available on a first-come first-served basis

to any eligible buyer. Homeownership assistance is available for the purchase of County-owned NSP homes. The Action Plan was approved by US HUD on January 12, 2009.

No funds remain for NSP Spot Loans at this time. However, homeownership assistance is available for the purchase of County owned NSP homes.

Infill Housing Program

The Infill Housing Program's main goal is to increase the availability of affordable homes for low and moderate-income families, as well as maintain a stock of affordable housing; redevelop urban neighborhoods by eliminating the blight of vacant, dilapidated or abandoned properties; equitably distribute homeownership opportunities within the Infill Target Areas; and generate payment of property taxes. Eligible households must be first-time homebuyers.

General Obligation Bond Program

General Obligation Bond Program helps to finance government capital improvement projects such as those included in the Building Better Communities Bond Program which allows the County to issue long-term bonds to fund more than 300 neighborhood and regional capital projects (including new housing) to be completed over the next 15 years.

In compliance with Miami-Dade County Resolution No. R-34-15 , adopted by the Board of County Commissioners on January 21, 2015, the Public Housing and Community Development Department will provide information for the public regarding new affordable housing properties constructed through programs such as the Documentary Stamp Surtax, Home Investment Partnership Program, State Housing Initiative Partnership, Neighborhood Stabilization Program, and General Obligation Bond Program and any other affordable housing programs.

Home Buying

First-Time Homebuyer Program

People seeking assistance in obtaining financing as first-time homebuyers and who qualify under CDBG, HOME, SHIP or Surtax income guidelines may apply for the loan program provided by the Miami-Dade County Public Housing and Community Development and local home mortgage lenders. In 2014, \$5.5 million was provided to 87 households and in 2015, \$4 million was made available to 83 households under this program.

Miami-Dade Public Housing and Community Development offers information and references to homeownership counseling and approved lenders by Miami-Dade County.

Housing Development

Public Housing and Community Development manages a variety of affordable housing programs funded and regulated at the local, state and federal levels. The primary purpose of this funding is

to provide low and moderate income Miami-Dade County residents with affordable, sanitary, safe and decent housing.

HOME Program

During the annual Action Plan process, Miami-Dade County solicits applications for proposals to address high-priority unmet needs in affordable housing. For-profit as well as non-profit developers are eligible to participate.

The HOME Program is designed to:

- Expand the supply of decent and affordable housing, particularly rental housing, for low- and very-low income individuals.
- Strengthen the abilities of State and local governments to design and implement strategies for achieving adequate supplies of decent, affordable housing.
- Provide both financial and technical assistance to participating jurisdictions (entitlement areas) including the development of model programs of affordable housing for very-low and low-income families.
- Expand and strengthen partnerships among all levels of government and the private sector, including for-profit and not-for-profit organizations, in the production and operation of affordable housing.

Documentary Surtax Program

For more than 27 years, Miami-Dade County's Affordable Housing Surtax Program has provided affordable housing assistance to thousands of low- and moderate-income Miami-Dade residents. Under Section 201.02 and 201.031 of the Florida Statutes, certain counties are authorized to levy a surtax on documents that transfer interest in Florida real property. Transfers of interest in single-family residences are exempt from this documentary surtax.

In 1984, Miami-Dade County exercised this authority and established a Housing Assistance Loan Trust Fund and implemented the Documentary Surtax Program ("Surtax Program"). This program benefits very low- to moderate-income families. Very low-income families have incomes of 50% or less than the median area income. Low-income families are those households with incomes of 80% or less of median area income. Moderate-income families have incomes greater than 80%, but less than 140% of median area income.

To date, the Surtax Program has provided:

- 7,128 low-to-medium income families with low-interest second mortgages, allowing them to become first-time homeowners.
- Homebuyer counseling, which has kept the mortgage default rate to less than 1.1% among Surtax Program participants.

- Low-cost construction financing that has allowed the County to partner with not-for-profit and for-profit affordable housing developers to produce over 15,000 affordable multi-family rental units.
- At least 50% of Surtax funds have benefitted low-income families.
- Statutory authority to levy this surtax is subject to sunset in 2011, eliminating the County's primary source of funds to address the affordable housing needs of its residents. In light of dwindling resources for production of affordable housing, the need to renew counties' authority to levy a local documentary surtax for affordable housing cannot be overstated.

State Housing Initiatives Partnership

The State Housing Initiatives Partnership program (SHIP) provides funds to local governments as an incentive to create partnerships that produce and preserve affordable homeownership and multifamily housing.

Miami-Dade County's SHIP Local Housing Assistance Plan addresses the housing needs of the very low, low and moderate income households, to expand production of and preserve affordable housing, to further the housing element of the local government comprehensive plan specific to affordable housing.

Homebuyer Education and Counseling services are provided through grants to the following:

- Opa-locka Community Development Corporation, Inc.
- Neighborhood Housing Services of South Florida, Inc.
- Trinity Empowerment Consortium, Inc.
- Miami Beach Community Development Corporation
- Centro Campesino Farmworkers Center, Inc.
- Experts Resource Community Center, Inc.

Infill Housing Developer Requirements

The Infill Housing Program provides incentives to encourage developers to build affordable housing.

The Infill Housing Program's main goal is to increase the availability of affordable homes for low and moderate-income families. Other goals include:

- Maintain a stock of affordable housing;
- Redeveloping urban neighborhoods by eliminating the blight of vacant, dilapidated or abandoned properties;
- Equitable distributing homeownership opportunities within the Infill Target Areas;
- Generating payment of ad valorem taxes.

The Infill Housing Program provides incentives to encourage developers to build affordable housing, including:

- Release of County liens and Citations for Not-For-Profit developers, and participating developers prior to March 17, 2014.
- Deferral of County liens and citations for participating For-Profit developers as of March 17, 2014.
- Refund of impact fees for homes sold to low income buyers (80% or below average median income).
- Building Permit Expedite Process.
- Funding assistance in the form of second mortgages for qualified buyers (subject to availability).

Tax Incentives

Housing developers undertaking condominium and townhome projects within the Enterprise Zone of Miami-Dade County may be eligible for a refund of sales tax paid on building materials and business equipment.

Both for-profit and not-for-profit developers (but not tax-exempt organizations that do not pay sales tax) are eligible to apply within six months of having a certificate of occupancy (for construction projects) or the purchase of the equipment.

Fair Housing Implication:

Publicly funded or subsidized housing opportunities must be affirmatively marketed to ensure availability to residents of all communities.

G. Lead Based Paint in Housing

The Department of Housing and Urban Development estimates that 38 million housing units have lead-based paint. The likelihood, extent, and concentration of lead-based paint increase with the age of the building. Because the greatest risk of paint deterioration is in dwellings built before 1950, older housing generally commands a higher priority for lead hazard controls. Lead was a major ingredient in most interior and exterior oil house paints before 1950, with some paints containing as much as 50 percent lead by dry weight. In the early 1950s, other ingredients became more popular, but some lead pigments, corrosion inhibitors, and drying agents were still used. Lead was first regulated in residential paint in 1972 at 0.5 percent and “banned” in 1978, meaning that paint could contain no more than 0.06 percent (600 parts per million) lead by dry weight. The Consumer Product Safety Improvement Act of 2008 reduced the threshold to 0.009 percent (90 parts per million) lead by dry weight.

The foremost cause of childhood lead poisoning in the United States today is lead-based paint and the accompanying contaminated dust and soil and occurs primarily through ingestion of lead-containing dust by normal hand-to-mouth and toy-to-mouth activity. Although lead poisoning affects children across of all socioeconomic backgrounds across the country, poor children in inner cities are disproportionately affected because lead-based paint hazards are more prevalent in older, dilapidated housing. Over half of younger children in these neighborhoods children have lead poisoning.

According to findings in 2002, Miami-Dade County has approximately 12% of older housing built before 1950, where an overwhelming majority of African American and Hispanic families reside in old and deteriorating housing. According to the report, over 230,000 children under 6 years living in such housing were reportedly at risk for lead poisoning. These areas have high proportions of at-risk children and most of the housing stock is in deteriorating and dilapidated condition. The inner-city urban area is composed mainly of one-story wood-framed houses in poor repair. While African Americans comprised only 21% of the population of Miami-Dade County, 53% of the reported cases of childhood lead poisoning from 1995 to 1998 were among African American children.

From 2000 to 2011, the Miami-Dade County Health Department received approximately 250 reports of elevated blood lead levels annually. The Miami-Dade County Healthy Homes and Lead Poisoning Prevention Program CLPPP works to raise awareness of environmental health risks in homes such as lead-based paint, mold, carbon monoxide, pesticides, and hazardous household products through one-on-one family education, realtor and landlord education. To reduce or eliminate environmental hazards in the home, the program refers families to local health and housing programs to fix their hazards.

Risk factors for lead poisoning in Miami-Dade County:

- Living in a home built before 1950
- Living in a recently remodeled home built before 1978
- Living in central urban area or close to major highways
- Having a sibling or playmate with lead poisoning
- Having been exposed to lead poisoning in another country

Miami-Dade County is responsible for meeting a number of Federal and Local requirements and conducting reviews regarding Environmental issues, Lead Based Paint Program Regulations, and following County Standards in dealing with Sub-Recipients. As such, the County requires sub-recipients are to identify, at the earliest possible time, activities and sites where projects will be carried out in order for the County to complete an Environmental Review. Disclosures by recipients of funding for construction and rehabilitation projects are required. Similar disclosure is required in the housing choice voucher program during the lease up process. Before renting

pre-1978 housing, landlords must disclose the presence of known lead based paint and lead based paint hazards in the dwellings and lessees must receive a federally approved pamphlet on lead poisoning prevention.

<http://portal.hud.gov/hudportal/documents/huddoc?id=lbph-03.pdf>

<http://miamidade.floridahealth.gov/programs-and-services/infectious-disease-services/disease-control/lead-poisoning-prevention.html>

<http://www.miamidade.gov/housing/library/guidelines/sub-recipient-06.pdf>

<http://www.miamidade.gov/search/home.asp#gsc.tab=0&gsc.q=lead%20based%20paint>

H. Planning & Zoning/Building Codes (Accessibility)

From the Miami-Dade Entitlement Area Consolidated Plan Fiscal Years 2013-2017:

For metropolitan jurisdictions, serious consideration should be given to ways they can participate in cooperative, inter-jurisdictional planning for construction of assisted housing. Local government policies that, for example, limit or exclude housing facilities for persons with disabilities or other housing for homeless people from certain residential areas may violate the provisions of the Fair Housing Act by indirectly discriminating against persons with disabilities and minorities, many of whom are homeless. Building codes which require certain amenities or setbacks also affect the feasibility of providing low- and moderate-income housing development. Even when zoning other governmental policies are permissive, neighborhood residents often resist placement of certain types of housing in their area.

Miami-Dade County ordinances address affordable housing; fair housing; group homes; community residential homes; inclusionary zoning practices; and bonus densities for affordable housing. However, only a very few of the non-entitlement communities in Miami-Dade County address the same issues. There are twenty-eight (28) non-entitlement communities in Miami-Dade County that receive funding through the county as sub-recipients. Each of these communities has their own set of comprehensive plan, zoning and land development regulations. The code of ordinances for each community was reviewed to determine if these communities address issues such as fair housing, affordable housing, group homes, and reference to Miami-Dade County regulations. Miami-Dade County's Code of Ordinances and Land Development report makes several recommendations aimed at addressing these potential barriers as follows:

- The zoning regulations include a wide range of districts which enable development and construction of a variety of housing styles, types and affordability. However, changing from one district to the other requires making application, paying fees and navigating a public process. *It is recommended that the County consider the practicality of combining some districts which may only have subtle differences thereby enabling more flexibility.*

- Some zoning districts permit all uses allowable in a Single-Family Residential District, but do not always specify Group Homes or Affordable Housing as allowable uses. However, the Workforce Housing Ordinance specifically lists all the districts which permit workforce housing unit. *It is recommended that the County consider evaluating the zoning language to ensure consistency.*
- Several of the zoning ordinances specify particular site plan review standards and processes. *It is recommended that the County consider evaluating these various standards and formulate a consistent set of site plan standards across all district regulations.*
- The lot and building requirements currently in place address properties which were subdivided, platted and/or developed since prior to 1938, and these requirements appear to have been modified over time in order to address unique circumstances that have existed. Consequently some references and requirements are not necessarily clear, and will require research to determine the status of property and what regulations apply. *It is recommended that these lot and building regulations be evaluated in relationship to properties that were legally subdivided over time to determine if a clearer and simpler approach could be enacted.*
- The lot size, building coverage, and setback requirements in zoning districts that allow smaller lots address new and “old” subdivisions and in some cases the building coverage and setback requirements could make development on legally subdivided/platted lots extremely difficult or impractical to build on. For these, although a variance process might apply, this process could be unpredictable, time consuming and costly, and could negatively affect the development of fair housing. *It is recommended that these circumstances be evaluated and modified if needed, to ensure that development of fair housing is not impeded.*
- The Development Impact Committee provides the administrative forum for the review and recommendation on all development, including that which proceeds to public hearings for review and approval. The Code of Ordinances specifies the duties and responsibilities of this committee, which include approval authority over all “development”, development of county impact, and development of regional impact. The Code of Ordinances does not provide guidelines or timelines for this committee’s review and action on applications, nor does it provide any oversight of this committee. Lack of such guidelines, timelines and oversight could pose impediments to the development of fair housing. *It is recommended that the County consider instituting mandated schedules for the review of new applications, and a method of oversight for this committee to establish a mechanism of checks and balances.*
- The Community Councils provide a forum for land use decisions which is local to the geographic areas of Miami-Dade County and include a membership comprised primarily of individuals local to that area. The Council members are trained in applicable regulations related to public hearing process, government in the sunshine and the like. However, there does not appear to be a mandate for member training in the State and Local laws governing land use and zoning. Further because members are local to the area, votes cast and decisions made by the Councils could have a local bias. It is recommended that the County consider implementing measures which would

ensure the professional training of all Council members in State and Local laws governing land use and zoning, and (if they do not already exist) formulate clear and unbiased standards for making decisions concerning these actions.

- Government processing costs for permitting, licensing and impact fees on new development can be barriers to developing affordable and special needs housing. *It is recommended that the County consider reducing or eliminating all permitting, licensing and impact fees for such development.*

It is recommended that Miami-Dade County consider mandating that non-entitlement communities which receive federal funds through the County adopt model ordinances to ensure consistency.

Accessible Residential Buildings

Most new residential buildings are required to be accessible. General guidelines as to what must be accessible are as follows:

- Single-family and duplex or 2-family dwellings are generally not required to be accessible except when they are part of a condominium or planned use development.
- Existing privately funded multi-family buildings can undergo remodeling or alterations with no access work required except for public/common use or employee areas.
- New dwelling units having all the living space on one floor and forming part of multi-family buildings comprised of four or more units, whether apartments, condominium or townhouses, must be accessible and must meet the following minimum requirements in accordance with the regulations of the Fair Housing Act which is part of the Florida Building Code, Chapter 11:
 - At least one accessible building entrance on an accessible route.
 - Accessible and usable public and common use areas.
 - All doors designed to allow passage by wheelchair users.
 - Accessible route into and through the dwelling unit.
 - Light switches, electrical outlets, thermostats, and other environmental controls must be accessible.
 - Bathroom walls must contain reinforcements in the walls to allow later installation of grab bars around toilets, tubs, shower stalls and seats.
 - Kitchens and bathrooms must be accessible and contain adequate maneuvering space

IV. JURISDICTION'S FAIR HOUSING PROFILE

A. Fair Housing Laws, Agencies and Fair Housing Complaint Data

Federal Fair Housing Act/U.S. HUD, Office of Fair Housing & Equal Opportunity

The Federal Fair Housing Act¹ prohibits discrimination on the basis of race, color, national origin, religion, sex, familial status, and disability. The U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity, is charged with enforcing the Federal Fair Housing Act. The Act contains administrative enforcement mechanisms, with HUD attorneys bringing actions before administrative law judges on behalf of victims of housing discrimination, and gives the Justice Department jurisdiction to bring suit on behalf of victims in Federal district courts. In connection with prohibitions on discrimination against individuals with disabilities, the Act contains design and construction accessibility provisions for certain new multifamily dwellings developed for first occupancy on or after March 13, 1991.

HUD has had a lead role in administering the Fair Housing Act since its adoption in 1968. The 1988 amendments, however, have greatly increased the Department's enforcement role. First, the newly protected classes have proven significant sources of new complaints. Second, HUD's expanded enforcement role took the Department beyond investigation and conciliation into the mandatory enforcement area. Complaints filed with HUD are investigated by the Office of Fair Housing and Equal Opportunity (FHEO). If the complaint is not successfully conciliated, then FHEO determines whether reasonable cause exists to believe that a discriminatory housing practice has occurred. Where reasonable cause is found, the parties to the complaint are notified by HUD's issuance of a Determination, as well as a Charge of Discrimination, and a hearing is scheduled before a HUD administrative law judge. Either party -- complainant or respondent -- may cause the HUD-scheduled administrative proceeding to be terminated by electing instead to have the matter litigated in Federal court. Whenever a party has so elected, the Department of Justice takes over HUD's role as counsel seeking resolution of the charge on behalf of aggrieved persons, and the matter proceeds as a civil action. Either form of action -- the ALJ proceeding or the civil action in Federal district court -- is subject to review in the U. S. Court of Appeals.²

U.S. HUD received a total of 57 complaints, representing 110 basis of discrimination alleged (more than one basis can be alleged in a complaint of discrimination). Familial status complaints were included in 42% of the complaints. Discrimination on the basis of disability was included in 33% of the claims. National origin and race discrimination were included in the complaints filed at a rate of 28% and 23% respectively. Claims of retaliation are included in 53% of the complaints.

¹ Title VIII of the Civil Rights Act of 1968, 42 USC 3601.

² <http://www.hud.gov/fairhousing>.

**Housing Discrimination Complaints received by U.S. HUD
(February 2011- October 2014)**

Violation City	HUD Case Number	HUD Filing Date	Bases List	Issues List
Aventura	04-11-0473-8	02/01/11	Disability,	380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.), 510 - Failure to make reasonable accommodation,
Aventura	04-14-0609-8	04/22/14	Disability,	311 - Discriminatory refusal to negotiate for rental, 320 - Discriminatory advertising, statements and notices, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.), 510 - Failure to make reasonable accommodation,
Aventura	04-14-0822-8	06/25/14	Disability, Retaliation	380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.), 510 - Failure to make reasonable accommodation,
Aventura	04-14-0983-8	08/18/14	Race, Disability, Retaliation	380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.), 510 - Failure to make reasonable accommodation,
Doral	04-13-0169-8	11/29/12	Race,	350 - Discriminatory financing (includes real estate transactions),
Hialeah	04-13-0520-8	03/14/13	National Origin,	380 - Discriminatory terms, conditions, privileges, or services and facilities,
Miami	04-11-0724-8	03/17/11	Disability,	510 - Failure to make reasonable accommodation,
Miami	04-11-1329-8	05/28/11	Race, Familial Status, Sex,	310 - Discriminatory refusal to rent, 332 - False denial or representation of availability - rental, 382 - Discrimination in terms/conditions/privileges relating to rental, 410 - Steering,
Miami	04-12-0558-8	04/04/12	Disability,	320 - Discriminatory advertising, statements and notices, 350 - Discriminatory financing (includes real estate transactions), 380 - Discriminatory terms, conditions, privileges, or services and facilities,
Miami	04-12-0858-8	07/03/12	Disability, National Origin,	332 - False denial or representation of availability - rental, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.), 510 - Failure to make reasonable accommodation,
Miami	04-12-1027-8	09/10/12	Disability, National Origin, Retaliation	380 - Discriminatory terms, conditions, privileges, or services and facilities, 430 - Otherwise deny or make housing unavailable, 450 - Discriminatory acts under Section 818 (coercion, Etc.), 510 - Failure to make reasonable accommodation,

Miami	04-13-0037-8	10/15/12	Disability, National Origin,	382 - Discrimination in terms/conditions/privileges relating to rental, 510 - Failure to make reasonable accommodation,
Miami	04-13-0204-8	12/10/12	Disability, National Origin, Retaliation	380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.), 510 - Failure to make reasonable accommodation,
Miami	04-13-0321-8	01/28/13	National Origin,	350 - Discriminatory financing (includes real estate transactions), 380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.),
Miami	04-13-0385-8	02/08/13	National Origin,	350 - Discriminatory financing (includes real estate transactions), 380 - Discriminatory terms, conditions, privileges, or services and facilities,
Miami	04-13-1056-8	08/30/13	National Origin,	350 - Discriminatory financing (includes real estate transactions), 380 - Discriminatory terms, conditions, privileges, or services and facilities, 430 - Otherwise deny or make housing unavailable,
Miami	04-14-0721-8	05/22/14	Race, Sex,	302 - Discriminatory refusal to sell and negotiate for sale, 312 - Discriminatory refusal to rent and negotiate for rental, 354 - Discrimination in the selling of residential real property, 381 - Discrimination in terms/conditions/privileges relating to sale, 382 - Discrimination in terms/conditions/privileges relating to rental,
Miami	04-14-0744-8	05/29/14	National Origin, Color,	351 - Discrimination in the making of loans, 380 - Discriminatory terms, conditions, privileges, or services and facilities,
Miami	04-15-0282-8	01/29/15	Race, Sex, Color,	353 - Discrimination in the terms/conditions for making loans, 380 - Discriminatory terms, conditions, privileges, or services and facilities,
Miami	04-15-0453-8	03/25/15	Disability,	380 - Discriminatory terms, conditions, privileges, or services and facilities, 500 - Failure to permit reasonable modification, 510 - Failure to make reasonable accommodation,
Miami Gardens	04-13-1067-8	09/05/13	Disability, Familial Status, National Origin, Sex, Retaliation	320 - Discriminatory advertising, statements and notices, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 430 - Otherwise deny or make housing unavailable, 450 - Discriminatory acts under Section 818 (coercion, Etc.), 510 - Failure to make reasonable accommodation,
Miami Gardens	04-13-1086-8	09/16/13	Disability, Retaliation	380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.), 500 - Failure to permit reasonable modification,

Miami Gardens	04-13-1087-8	09/16/13	Disability, Familial Status, Retaliation	320 - Discriminatory advertising, statements and notices, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.), 500 - Failure to permit reasonable modification,
Miami Gardens	04-13-1090-8	09/17/13	Familial Status, Retaliation	320 - Discriminatory advertising, statements and notices, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.),
Miami Gardens	04-13-1091-8	09/17/13	Familial Status, Retaliation	320 - Discriminatory advertising, statements and notices, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.),
Miami Gardens	04-13-1093-8	09/17/13	Familial Status, Retaliation	320 - Discriminatory advertising, statements and notices, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.),
Miami Gardens	04-13-1094-8	09/17/13	Familial Status, Retaliation	320 - Discriminatory advertising, statements and notices, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.),
Miami Gardens	04-13-1095-8	09/17/13	Familial Status, Retaliation	320 - Discriminatory advertising, statements and notices, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.),
Miami Gardens	04-13-1097-8	09/17/13	Familial Status, Retaliation	320 - Discriminatory advertising, statements and notices, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.),
Miami Gardens	04-13-1098-8	09/17/13	Disability, Familial Status, Retaliation	320 - Discriminatory advertising, statements and notices, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 430 - Otherwise deny or make housing unavailable, 450 - Discriminatory acts under Section 818 (coercion, Etc.), 510 - Failure to make reasonable accommodation,
Miami Gardens	04-13-1099-8	09/17/13	Familial Status, Retaliation	320 - Discriminatory advertising, statements and notices, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.),
Miami Gardens	04-13-1102-8	09/17/13	Familial Status, Retaliation	320 - Discriminatory advertising, statements and notices, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.),
Miami Gardens	04-13-1103-8	09/17/13	Familial Status, Retaliation	320 - Discriminatory advertising, statements and notices, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.),

Miami Gardens	04-13-1104-8	09/17/13	Retaliation	450 - Discriminatory acts under Section 818 (coercion, Etc.),
Miami Gardens	04-13-1108-8	09/18/13	Race, Familial Status, Retaliation	320 - Discriminatory advertising, statements and notices, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.),
Miami Gardens	04-13-1109-8	09/18/13	Familial Status, Retaliation	320 - Discriminatory advertising, statements and notices, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.),
Miami Gardens	04-13-1110-8	09/18/13	Disability, Retaliation	380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.), 510 - Failure to make reasonable accommodation,
Miami Gardens	04-13-1112-8	09/18/13	Familial Status, Retaliation	320 - Discriminatory advertising, statements and notices, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.),
Miami Gardens	04-13-1113-8	09/18/13	Retaliation	450 - Discriminatory acts under Section 818 (coercion, Etc.),
Miami Gardens	04-14-0022-8	10/21/13	Familial Status, Retaliation	320 - Discriminatory advertising, statements and notices, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.),
Miami Gardens	04-14-0026-8	10/21/13	Familial Status, Retaliation	320 - Discriminatory advertising, statements and notices, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.),
Miami Gardens	04-14-0114-8	11/18/13	Familial Status, Retaliation	320 - Discriminatory advertising, statements and notices, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.),
Miami Gardens	04-14-0115-8	11/18/13	Retaliation	450 - Discriminatory acts under Section 818 (coercion, Etc.),
Miami Gardens	04-14-0156-8	12/09/13	National Origin, Retaliation	380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.),
Miami Gardens	04-14-0288-8	02/06/14	Race, Familial Status, Retaliation	320 - Discriminatory advertising, statements and notices, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.),
Miami Gardens	04-14-0295-8	02/07/14	Race, Familial Status, Retaliation	320 - Discriminatory advertising, statements and notices, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.),

Miami Gardens	04-15-0043-8	10/14/14	Familial Status,	320 - Discriminatory advertising, statements and notices, 380 - Discriminatory terms, conditions, privileges, or services and facilities,
Miami Gardens	04-15-0044-8	10/14/14	Familial Status,	320 - Discriminatory advertising, statements and notices, 380 - Discriminatory terms, conditions, privileges, or services and facilities,
North Miami Beach	04-13-0909-8	07/12/13	Race, National Origin, Sex,	310 - Discriminatory refusal to rent, 320 - Discriminatory advertising, statements and notices, 382 - Discrimination in terms/conditions/privileges relating to rental, 450 - Discriminatory acts under Section 818 (coercion, Etc.),
North Miami Beach	04-13-0910-8	07/12/13	Race, National Origin,	320 - Discriminatory advertising, statements and notices, 382 - Discrimination in terms/conditions/privileges relating to rental, 400 - Refusing to provide insurance, 430 - Otherwise deny or make housing unavailable,
Opa Locka	04-14-0244-8	01/21/14	Disability,	320 - Discriminatory advertising, statements and notices, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 430 - Otherwise deny or make housing unavailable, 510 - Failure to make reasonable accommodation,
Opa Locka	04-14-0296-8	02/07/14	Race, Familial Status,	320 - Discriminatory advertising, statements and notices, 380 - Discriminatory terms, conditions, privileges, or services and facilities, 450 - Discriminatory acts under Section 818 (coercion, Etc.),
Opa Locka	04-14-0338-8	02/14/14	Disability,	380 - Discriminatory terms, conditions, privileges, or services and facilities, 500 - Failure to permit reasonable modification, 510 - Failure to make reasonable accommodation,
South Miami	04-13-0456-8	02/26/13	Race, Disability, National Origin, Color,	380 - Discriminatory terms, conditions, privileges, or services and facilities, 430 - Otherwise deny or make housing unavailable, 460 - Using ordinances to discriminate in zoning and land use, 510 - Failure to make reasonable accommodation,
Surfside	04-12-1049-8	09/14/12	National Origin,	382 - Discrimination in terms/conditions/privileges relating to rental, 430 - Otherwise deny or make housing unavailable, 450 - Discriminatory acts under Section 818 (coercion, Etc.),
Surfside	04-12-1050-8	09/14/12	National Origin,	382 - Discrimination in terms/conditions/privileges relating to rental, 430 - Otherwise deny or make housing unavailable, 450 - Discriminatory acts under Section 818 (coercion, Etc.),
Surfside	04-12-1051-8	09/14/12	Race, National Origin, Color,	382 - Discrimination in terms/conditions/privileges relating to rental, 430 - Otherwise deny or make housing unavailable,

Florida Fair Housing Act/Florida Commission on Human Relations

The Florida Fair Housing Act³ was passed by the Florida Legislature in 1983, and amended in 1989. The Florida Fair Housing Act parallels the Federal Fair Housing Act. The Florida Commission on Human Relations (FCHR) is a Fair Housing Assistance Program (FHAP) agency and enforces Florida's state fair housing law. The Florida Fair Housing Act has been certified as substantially equivalent to the federal law. Substantial equivalency certification takes place when a State or local agency applies for certification and the U.S. Department of Housing and Urban Development (HUD) determines that the agency enforces a law that provides substantive rights, procedures, remedies and judicial review provisions that are substantially equivalent to the federal Fair Housing Act.

Substantially equivalent agencies are eligible to participate in the Fair Housing Assistance Program (FHAP). FHAP permits HUD to use the services of substantially equivalent State and local agencies in the enforcement of fair housing laws, and to reimburse these agencies for services that assist in carrying out the spirit and letter of the federal Fair Housing Act. While certification results in a shift in fair housing enforcement power from the federal government to the State or locality, the substantive and procedural strength of the federal Fair Housing Act is not compromised. Prior to certification, an agency must demonstrate to HUD that it enforces a law that is substantially equivalent to the federal Fair Housing Act.

When HUD receives a complaint and the complaint alleges violations of a State or local fair housing law administered by an interim certified or certified agency, HUD will generally refer the complaint to the agency for investigation, conciliation and enforcement activities. Fair housing professionals being based in the locality where the alleged discrimination occurred benefits all parties to a housing discrimination complaint. These individuals often have a greater familiarity with local housing stock and are in closer proximity to the site of the alleged discrimination, offering greater efficiency in case processing.

FCHR received a total of 422 complaints of housing discrimination between October 1, 2009 and June 30, 2015. The majority of the complaints alleged some form of discrimination based on disability at 39%. Race, color, and national origin collectively represent 34% of the complaints received. Sex and familial status represent 9% and 8% of the total complaints respectively.

³ State of Florida, Civil Rights Statutes, Title XLIX, Chapter 760.2.

Florida Commission on Human Relations
Housing Discrimination Complaints
January 1, 2011 - December 30, 2014

	Race	Color	National Origin	Religion	Sex	Familial Status	Disability	HIV Status	Retaliation	Total
FY 2009-2010	16	0	15	4	7	11	39	0	6	98
FY 2010-2011	20	1	8	4	10	3	24	0	1	71
FY 2011-2012	9	3	11	2	6	7	33	0	4	75
FY 2012-2013	12	3	18	3	7	5	20	0	8	76
FY 2013-2014	7	1	4	2	0	4	26	0	5	49
FY 2014-2015*	11	1	6	1	6	4	22	0	2	53
TOTAL	75	9	62	16	36	34	164	0	26	422

*Partial year

Miami-Dade County/Miami-Dade County Commission on Human Rights

Miami-Dade County's civil and human rights ordinance is codified as Chapter 11A of the Miami-Dade County Code, as amended.⁴ The ordinance prohibits discrimination against any person in Miami-Dade County in the area of employment, public accommodations, credit and financing practices, and housing accommodations on the basis of race, color, religion, ancestry, national origin, sex, pregnancy, age, disability, marital status, familial status, sexual orientation, veteran status or source of income.

Unlike the state fair housing law, the Miami-Dade County ordinance currently does not have substantial equivalency certification from U.S. HUD. The ordinance was designated as substantially equivalent in 1983, but has since lost the certification. Substantial equivalency certification results in housing discrimination cases having the benefit of State or local complaint processing. At the same time, the process assures that the substantive and procedural strength of the federal Fair Housing Act will not be compromised.

⁴ Miami Dade County Ordinance No.90-32, Chapter 11A, Article II.

The Miami-Dade County Commission on Human Rights is a quasi-judicial, as well as an advisory board, charged with the enforcement of Miami-Dade County's civil and human rights ordinance, codified as Chapter 11A of the Miami-Dade County Code, as amended. As part of the Office of Human Rights and Fair Employment Practices department, The Miami-Dade County Commission on Human Rights promotes fairness and equal opportunity in employment, housing, public accommodations, credit and financing practices, family leave and domestic violence leave.

The Commission on Human Rights receives, initiates, investigates, and conciliates complaints of discrimination under federal, state and local laws. The services provided by the Commission on Human Rights are available to all Miami-Dade County citizens.

From January 1, 2011 to December 30, 2014, the Miami-Dade County Commission on Human Rights received a total of 68 complaints. Discrimination on the basis of race (32%), disability (30%), and national origin (22%) represent the greater portion of all complaints received.

**Miami-Dade County Commission on Human Rights
Housing Discrimination Complaints
January 1, 2011 - December 30, 2014**

Federally Protected Classes								Additional Protected Classes under Miami-Dade County Ordinance				
	Race	Color	National Origin	Religion	Sex	Familial Status	Disability	Age	Marital Status	Sexual Orientation	Source of Income	Total
2011	5		4			2	2		2		1	16
2012	6		7				6	3	2	4		19
2013	5		1		1	1	7	1	1		1	19
2014	6		3	1	3	2	4			1	1	14
Total	22		15	1	4	5	19	4	5	5	3	68
<i>Note: Some complaints alleged two or more protected classes in their complaints. Retaliation was not included in this table and therefore, the number of protected classes does not equal the total in some instances.</i>												

Private

While there are several housing counselling and other agencies in the jurisdiction that provide fair housing assistance, HOPE fills a unique void in this community as it is the only private, non-profit, full service, fair housing organization in Miami-Dade and Broward counties currently engaged in comprehensive education/outreach and enforcement activities.

The overall mission of HOPE is *to fight housing discrimination in Miami-Dade and Broward counties and to promote equal housing opportunities throughout Florida*. HOPE employs a three-tiered strategy of Education & Outreach, Intake & Counseling and Enforcement to accomplish its mission and operates *Fair Housing and Special Housing Programs* under three Initiatives:

- The *Education and Outreach Initiative* is designed to ensure that the general public and protected classes become knowledgeable concerning fair housing laws and the means available to seek redress for fair housing rights violations, and includes private housing industry provider education programs structured to furnish developers, real estate brokers, property managers, financial institutions, and the media/advertising industry with the most current information necessary to fully comply with federal, state and local fair housing laws.
- The *Private Enforcement Initiative* involves testing and investigation of alleged fair housing violations in the South Florida area, the prevention and elimination of discriminatory housing practices, and pursuing the enforcement of meritorious claims.
- The *Special Housing Initiative* is responsible for public and private relocation contracts, operates a comprehensive mobility counseling component and complies with court-ordered *consent decree* settlement responsibilities.

HOPE investigates complaints through testing, contact, and evaluation of evidence. Trained testers visit local rental and sales offices (identified in either systemic or complaint based evaluations) to obtain information regarding availability of housing, costs, and amenities. The results of these tests are evaluated by trained staff to determine if persons of protected classes are receiving equal housing opportunities.

Fair housing “testing” is a controlled method to determine differential treatment in the quality, content and quantity of information and services given to home seekers by real estate agents, leasing agents, property managers and owners. A “test” is an authentic simulation of a housing transaction used to compare the treatment of one home seeker to another to determine if there are violations of fair housing laws. The technique of “testing” involves the pairing of individuals, similar in relevant respects except for the variable being tested (e.g., race, familial status, disability). After conclusion of the contact or visit, the experiences of the two or more “testers” are compared to determine whether the alleged discrimination against the complainant exists.

Enforcement activities focus on residential housing access by targeting specific policies and practices of selected housing providers and lending institutions. The Initiative has provided an avenue to address and seek resolution of complaints regarding fair housing violations and assisted South Florida residents in achieving equal access to the housing of their choice. Complaint-based testing provides a three-fold result. First, evidence of discrimination may be collected in support of further legal action. Second, housing providers who do not comply with the fair housing laws are identified, penalized, and educated about their rights and responsibilities. Third, the

enforcement activities help local jurisdictions to administer housing and community development programs in a manner that affirmatively furthers the purpose of the Fair Housing Act and, monitor their progress toward responsibly assisting all residents to overcome identified impediments to fair housing choice.

HOPE operates a Housing Discrimination HELP LINE that provides complaint intake, information and referral services, counseling services, and assistance to South Florida residents seeking housing opportunities in the private housing market. Below is a summary of the calls responded to in 2012, 2013, and 2014.

**HOPE, Inc. Housing Discrimination Help Line
Miami-Dade County
JANUARY 1, 2012 - DECEMBER 31, 2012**

PROTECTED CLASS	TRANSACTION						
	Rental	Sales	Lending	Insurance	Harassment	Other	TOTAL
Race	7			1		1	9
Disability	20				1	4	25
Familial Status	2						2
Sex	1						1
National Origin	2		2		1		5
Color	1						1
Religion	1						1
Age	2		1				3
Sexual Orientation	2				1		3
Gender Identity/ Expression					1		1
Marital Status	1						1
Source of income			1				1
Other	2		4		1	197 *	204
TOTAL	41	0	8	1	5	202	257

***OTHER:**

Landlord/Tenant =	47
Low Income Housing =	45
Section 8/Public Housing =	22
Homeowner Association =	5
1 st Time Homeowner =	5
Financial Assistance =	8
Homelessness=	18
Foreclosure =	6
Miscellaneous =	41
TOTAL =	197

HOPE, Inc. Housing Discrimination Help Line

Miami-Dade County
JANUARY 1, 2013 - DECEMBER 31, 2013

PROTECTED CLASS	TRANSACTION						
	Rental	Sales	Lending	Insurance	Harassment	Other: _____	TOTAL
Race	77		6		2	1	87
Disability	34						34
Familial Status	12						12
Sex	1						1
National Origin	16		1				17
Color							
Religion	1						1
Age	1				1		2
Sexual Orientation	1						1
Gender Identity/ Expression							
Marital Status							
Source of income	1		1				2
Other		1		1	2	198 *	198
TOTAL	25	1	0	1	5	199	355

***OTHER:**

Landlord/Tenant=	50
Low Income Housing =	49
Section 8/Public Housing =	18
Homeowner Association =	11
1 st Time Homeowner =	8
Financial Assistance =	6
Foreclosure =	9
Homelessness =	26
Miscellaneous =	21
TOTAL =	198

HOPE, Inc. Housing Discrimination Help Line
Miami-Dade County
JANUARY 1, 2014 - DECEMBER 31, 2014

PROTECTED CLASS	TRANSACTION						
	Rental	Sales	Lending	Insurance	Harassment	Other:_____	TOTAL
Race	23	1	2		4	1	31
Disability	43	3			2		48
Familial Status	8	1		2	1		12
Sex	2						2
National Origin	5	1		2			8
Color	1						1
Religion	1						1
Age							0
Sexual Orientation	5				1		6
Gender Identity/ Expression					1		1
Marital Status							0
Source of income	27	1					28
*Other		3	5	2	5	255 *	270
TOTAL	115	10	7	6	14	256	408

***OTHER:**

Landlord/Tenant=	75
Low Income Housing =	49
Section 8/Public Housing=	26
Homeowner Association=	8
1 st Time Homeowner =	5
Financial Assistance =	9
Foreclosure =	11
Homeless ness=	39
Miscellaneous =	33
TOTAL =	255

HOPE, Inc. Housing Discrimination Help Line
Miami-Dade County
JANUARY 1, 2015 - AUGUST 31, 2015

PROTECTED CLASS	TRANSACTION						
	Rental	Sales	Lending	Insurance	Harassment	Other:_____	TOTAL
Race	15	1			6		22
Disability	10	1				1	12
Disability-Emotional Support Animal	3						3
Familial Status	5						5
Sex	1						1
National Origin	5						5
Color							
Religion	1						1
Age							
Sexual Orientation	3						3
Gender Identity/Expression							
Marital Status	1	1					2
Source of income	8						8
Other	10	1	1		2	168	182
TOTAL		4	1		8	169	244

OTHER:

Landlord/Tenant=	74
Low Income Housing =	39
Section 8/Public Housing=	16
Homeowner Association=	10
1 st Time Homeowner =	10
Financial Assistance =	4
Foreclosure =	5
Homelessness =	12
Miscellaneous =	12
TOTAL =	182

B. Fair Housing Litigation

HOPE v. Vacation Rental Organization

Vacation Rental Organization operated a website that allowed homeowners to advertise their properties for rent. Homeowners were allowed to indicate a preference against renting their homes to families with children and persons with disabilities. This case settled for \$9 thousand in damages and fees. In injunctive relief, the website was revised to allow homeowners to indicate accessibility features and information regarding features that may not be “child friendly”. For example, the website may indicate that a property has an unenclosed pool, or tables with sharp corners, or stairs, or many small/dangerous objects, etc. However, VRO may not allow users to indicate, in any way, that these features may make a property unsuitable for children.

HOPE v. Express Florida Realty, Inc.

HOPE settled the familial status complaint, detailed in the Filings section of this report, against Decoraon Realities, owner of J Apartments in Miami Beach, and its management company, Express Florida Realty, in January of 2014. The complaint was based upon testing conducted by HOPE in response to allegations from a complainant that employees of J Apartments had forced her to leave the complex because she was pregnant. The terms of the settlement included an agreement by Decoraon to pay thousands of dollars in damages and also agree not to discriminate on the basis of familial status in the future and to conduct its advertisements in accordance with the applicable provisions of the Fair Housing Act. The owners of J Apartments also agreed to post a sign displaying the fair housing logo and the words “Equal Hosing Opportunity”. Additionally, Decoraon promised that their applicable staff would undergo fair housing training.

HOPE v. Miami Property Group, Ltd. (Miami-Dade) 1:14-cv-22142-KMM

To address the fair housing violations, HOPE was joined by over thirty residents in filing a federal administrative complaint with U.S. HUD against Miami Property Group and Charter Realty, outlining issues related to race, color, national origin, limited English proficiency, disability, harassment, and retaliation. On June 10, 2014, HOPE, along with five individual residents sued the owners and operators of the 183rd and 187th Street Apartments and the 22nd Avenue Apartments under the Fair Housing Act and the Rehabilitation Act alleging discrimination based on disability, familial status, and gender. The Defendant, Miami Property Group, LTD owns and Charter Realty Group manages three developments with 507 units in Miami Gardens and Opa Locka. Paulette Gopaul is the district manager for these developments. This lawsuit followed the filing of over 30 federal administrative complaints with U.S. HUD outlining housing discrimination issues related to race, color, national origin, limited English proficiency, disability, harassment, and retaliation. While the HUD complaints were under investigation, fair housing violations continued, including the denial of reasonable accommodations/modifications that resulted in injury or potential injury. Residents were required to provide a medical release from their doctors in connection with a request for a reasonable accommodation or housing benefit and no changes to discriminatory House Rules or policies were issued to the residents. Playground equipment that had previously been left in disrepair was simply removed, leaving nothing for elementary school aged children to play on.

A motion for preliminary injunction was also filed in conjunction with the lawsuit in order to obtain unfulfilled requests for wheelchair ramps, grab bars for bathroom features, and other issues of immediacy. During pendency and delay of a hearing on these issues, ramps were built, grab bars were installed, and other accommodations and modifications were made. The case settled in April 2015 for \$625,000 and included comprehensive injunctive relief in the form of changes to rules and policies, physical changes to the property for accessibility and child-friendly play areas, and training for property staff.

HOPE v. SPV Realty

In 2012, systemic testing of Design Place Rental Apartments in Miami uncovered evidence of unequal treatment of persons based on race. All African American testers were quoted higher prices, given limited availability information while White testers were shown models and offered more affordable rental costs. Four claims were brought against SPV under the Fair Housing Act: making unavailable or denying a dwelling to a person because of race, discriminatory terms and conditions of sale or rental of a dwelling, providing inaccurate or untruthful information about the availability of dwellings for rental because race, and publishing brochures with photographs containing only White models, conveying the message that dwellings are not available to a group of persons because of race. The case settled for an undisclosed amount and conditions.

On December 23, 2014, after investigating Design Place (SPV Realty), HOPE filed a second lawsuit regarding repeated discrimination against African-Americans and the violation of the settlement agreement. African-American testers were sent in and each time they were provided with false representations of what was available and the cost for rent. As White-Hispanic testers went in to inquire, the contrast in the quantity of information and quality of treatment was as apparent as it was in 2012.

HOPE v. Elite River View Apartments & Roberto “Doe”

On May 22, 2014, the Florida Justice Institute filed the lawsuit against Elite River View Apartments in Miami, on behalf of HOPE Inc. and its testers, for refusing to make housing available for African-Americans. Upon filing and the story being covered in the media, two bona fide complainants emerged and were able to get justice as a result of this investigation. Systemic testing of Elite River View Apartments uncovered discrimination against African-Americans. On several occasions, African-American testers were sent to the complex seeking housing and each time the manager refused to meet with them. On one occasion, the manager told an African-American tester that he did not “invite her in”. The manager provided false information about price and availability to African-Americans. In contrast, White-Hispanics were provided tours of the units and told that units were available to them. The case was settled in November 2014.

Bhogaita v. Altamonte Heights Condo Association

Nos. 13–12625, 13–13914.

United States Court of Appeals, Eleventh Circuit

Aug. 27, 2014. Plaintiff filed suit against the Association under the Federal and Florida Fair Housing Acts. Plaintiff alleged that the Association violated these statutes when it enforced its pet weight policy and demanded that plaintiff remove his emotional support dog from his condominium. The jury awarded plaintiff damages and the district court awarded plaintiff attorneys' fees. The Association appealed. The court concluded that plaintiff was entitled to partial summary judgment on the refusal-to-accommodate element; plaintiff offered sufficient evidence to show he has a disability within the meaning of the FHA; plaintiff produced evidence supporting the conclusion that the requested accommodation was necessary; the jury instructions do not warrant reversal; in allowing the dog to remain in the courtroom, the district court did not abuse its discretion; and the district court did not err in awarding attorneys' fees. Because there was no merit to any of the arguments the Association made on appeal, the court affirmed the jury's verdict and the district court's order.

City of Miami v. Bank of America

No. 14-14543

United States Court of Appeals, Eleventh Circuit

September 1, 2015

D.C. Docket No. 1:13-cv-24506-WPD

Court held that the City has constitutional standing to bring its FHA claims, and that the district court erred in dismissing those claims with prejudice on the basis of a zone of interests analysis, a proximate cause analysis, or the inapplicability of the continuing violation doctrine.

On December 19, 2013, City of Miami issued a press release announcing that it filed federal lawsuits against Bank of America, CitiGroup, and Wells Fargo. In the lawsuits, the City alleges that the banks targeted minority residents for predatory practices that left those residents tied to undesirable mortgage loans, which in turn led to skyrocketing numbers of foreclosures in Miami's communities of color. Such targeting would be in violation of the Federal Fair Housing Act, and the lawsuits allege that these methods have been employed by the banks since 2004, if not earlier. The banks are being accused of generating loans with particularly unfavorable terms and conditions specifically for minority loan applicants. The City of Miami's position is that the banks profited incredibly through this practice of predatory lending in communities of color, while the City itself suffered great financial harm. This financial harm, for which the City says it has not yet been compensated, includes a loss of property tax revenue and increased municipal costs associated with dealing with the issues that come with a high volume of home foreclosures.

Fair Housing Implications: Documented incidents of housing discrimination evidenced by testing/litigation results indicate the need for housing providers geared toward compliance and support of public and private enforcement efforts.

V. Lending Data & Analysis

Introduction

Barriers to full access to home mortgage lending have historically been encountered by different ethnic and racial groups. These barriers have typically been identified by higher rejection and failure rates for loan applications. In 1975, Congress enacted the Home Mortgage Disclosure Act (HMDA) in response to the widespread practice of mortgage "redlining," the systematic exclusion of minority neighborhoods in the marketing or originating of home loans. HMDA requires that certain financial institutions (banks, savings associations, credit unions, and other mortgage lending institutions) make public a wide range of loan application data on loan approval decisions, borrower demographics, and property characteristics. Home mortgage disclosure information is used in AI's to examine fair lending practices within a jurisdiction. Such information helps to further illustrate the types of fair housing impediments that may exist.

HMDA Data Analysis

HOPE utilizes LendingPatterns™ software⁵ in order to obtain HMDA data for specific geographical areas. LendingPatterns™ is a web-based data mining and exploration tool that analyzes millions of records for thousands of lenders to produce reports on numerous aspects of mortgage lending in America. Lending data for a period of eleven years (2004-2014) for Miami-Dade County was obtained in order to identify patterns and disparities in home mortgage lending since completion of the 2010 AI. This analysis is based on the following parameters:

- All lenders
- Lien Status: Secured by First Lien
- Loan Amount: Conforming and Jumbo
- Loan purpose: Home Purchase and Refinancing loans
- Loan Type: Conventional, FHA and VA loans
- Occupancy Status: Owner Occupied and Non-Owner Occupied
- Property Type: 1-4 Unit Family
- Spread: Reported and Not Reported

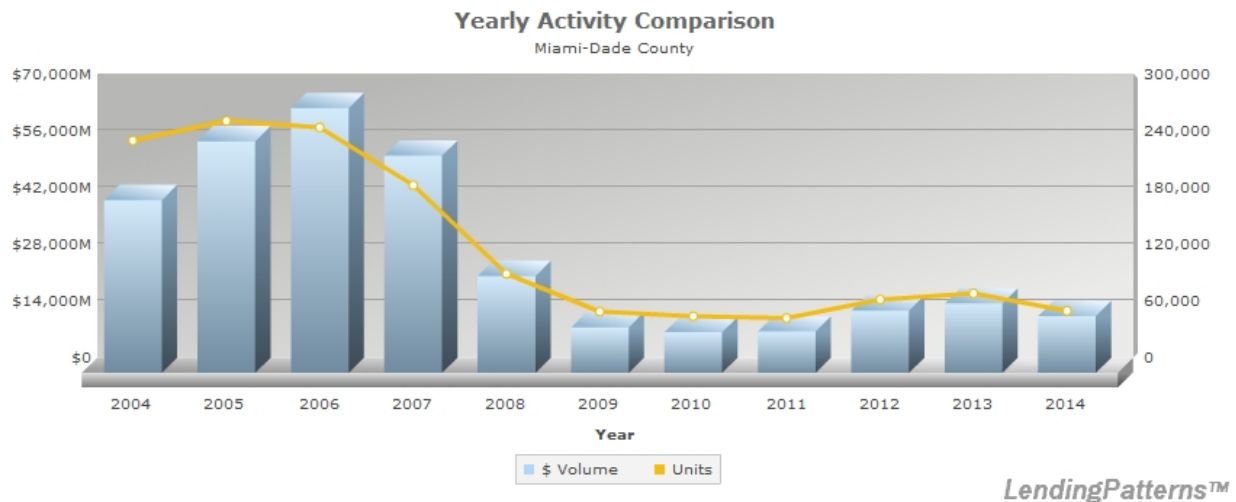
LendingPatterns™ allows the user to analyze loan data according to seven different geographical groupings: national, state, MSA, county, census tract, CRA assessment area, congressional district and user defined custom geographies. The census tract locations for the HMDA data include all loans in the census tracts within the boundaries of Miami-Dade County.

The Yearly Activity Comparison graph is a LendingPattern report that provides a view of the dollar value and number of Miami-Dade County home loans, annually, from 2004 to 2014. This graph

⁵ More information about LendingPatterns™ software is available at www.lendingpatterns.com.

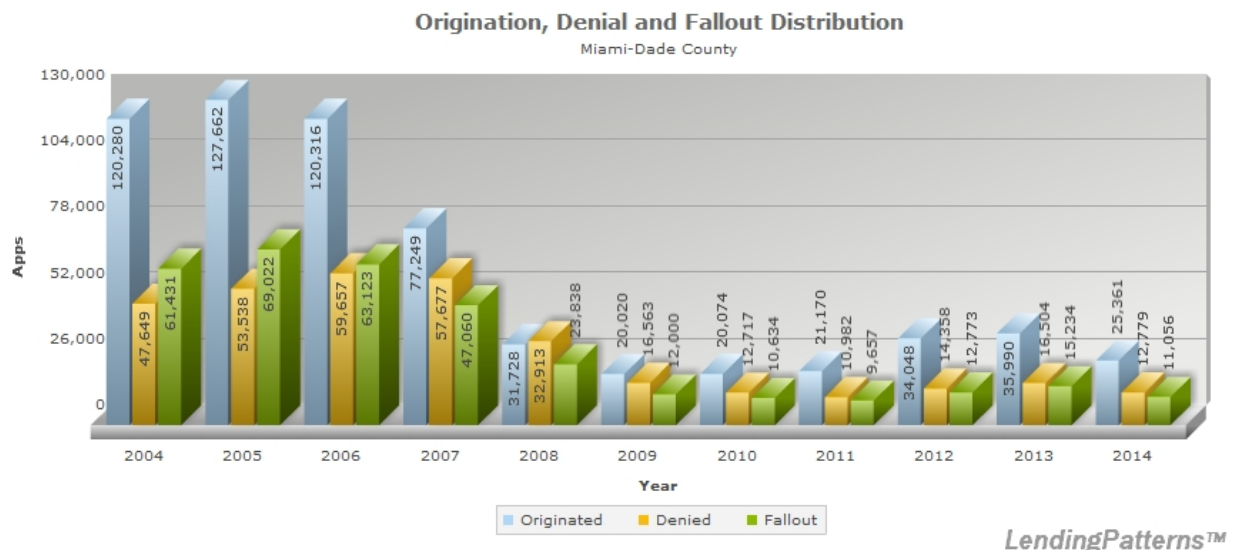
illustrates how both the number and the value of these loans increased steadily from the beginning of the period, peaking numerically (250,222 loans) in 2005 and by dollar value (\$65,273,6M) in 2006 , the year before the Great Recession, and bottoming out in terms of dollar loan value in 2010, the year after the Great Recession concluded. Although the dollar loan value reached its lowest in 2010 (\$10,017.2M), the number of loans reached its lowest (41,809) a year later in 2011. The graph shows gradual but steady growth in loan volume and number thereafter until a slight drop off in numeric and dollar volume in 2014 (49,196 and \$14,003M, respectively).

Chart 1



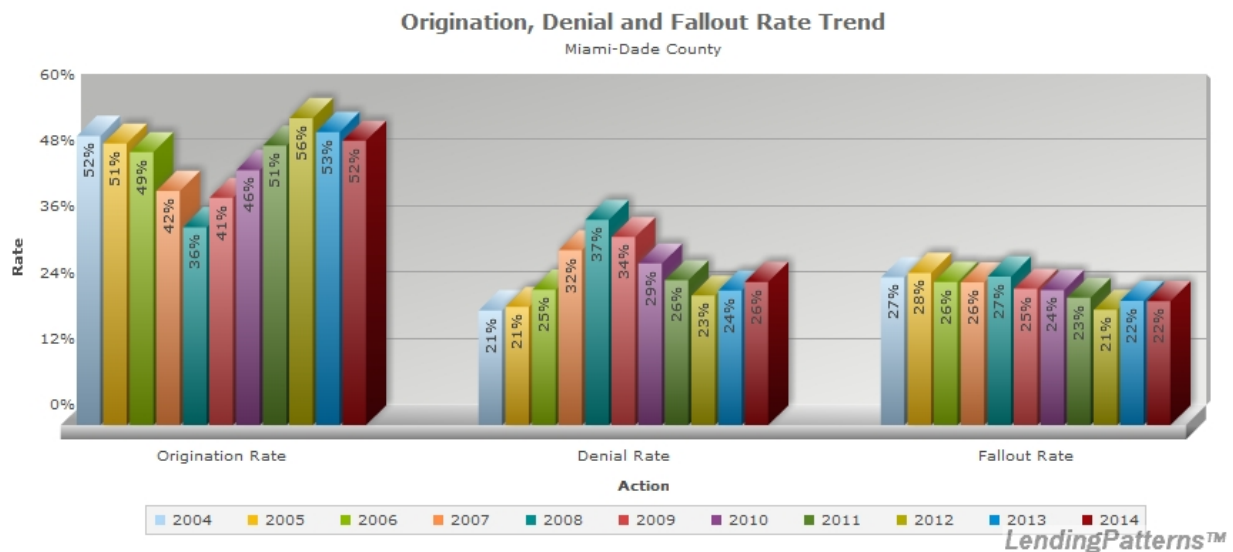
The Origination, Denial and Fallout Distribution graph shows how lenders and borrowers in Miami-Dade County have responded to the application process with originations, denials and fallout for the 11-year period starting in 2004.

Chart 2



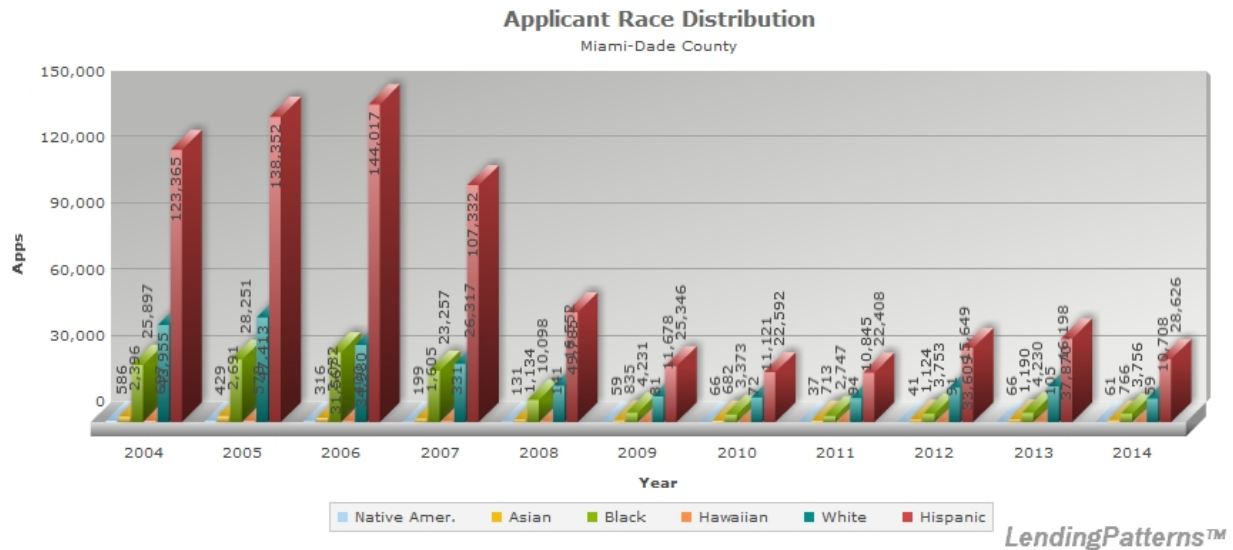
The Origination, Denial and Fallout Trend graph provides a perspective of how loan origination closely mirrored the fall and rise of housing prices, employment and other economic indicators with the impact of the 2007 to 2009 Great Recession, rebounding along with the subsequent recovery. The graph also shows how denials moved in an opposite direction to origination, peaking when originations fell and falling when originations peaked. Another important indicator on this graph is the prevalence of fallout. Fallout is essentially when a borrower decides not to follow through with an application that has progressed all the way to the point where the interest rate has been locked in. Fallout is suspected to sometimes indicate the reluctance of a borrower to continuing working with a lender because of ill treatment.

Chart 3



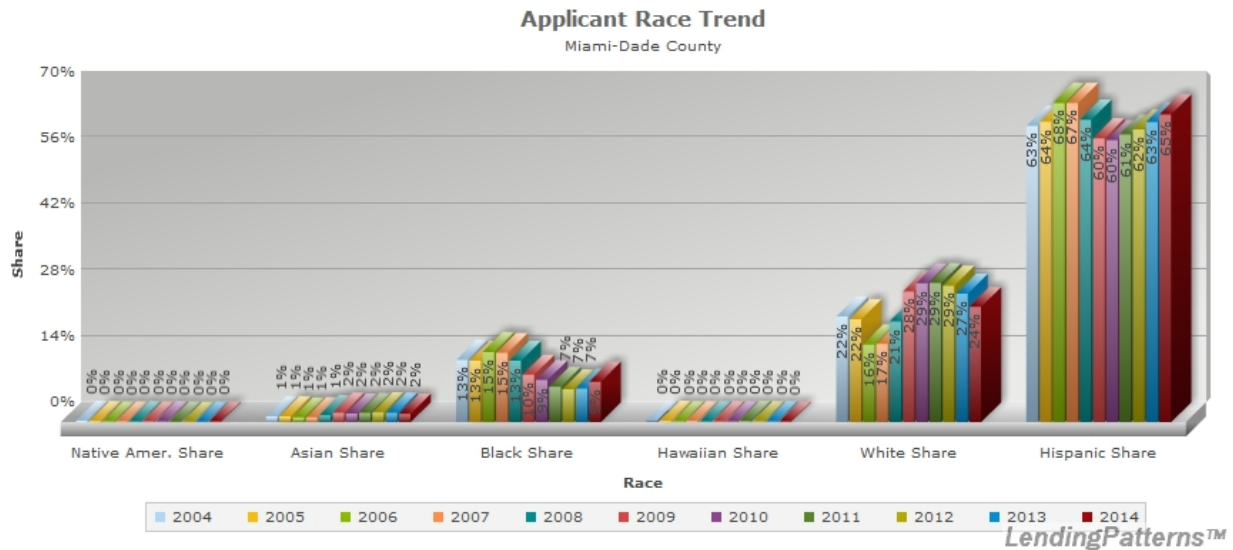
Over the eleven years from 2004 to 2014, Hispanic applicants consistently submitted the highest numbers of applications, followed by White applicants, then Black applicants.

Chart 4



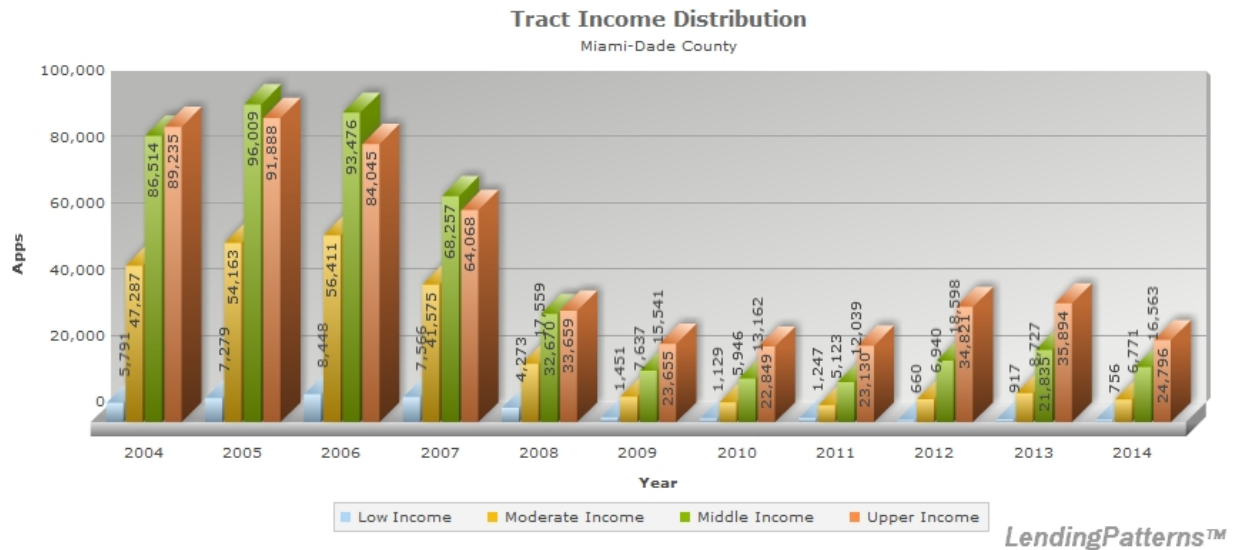
Subsequently, over the eleven years from 2004 to 2014, Hispanic applicants consistently submitted the largest share of the applications, followed by White applicants, then Black applicants.

Chart 5



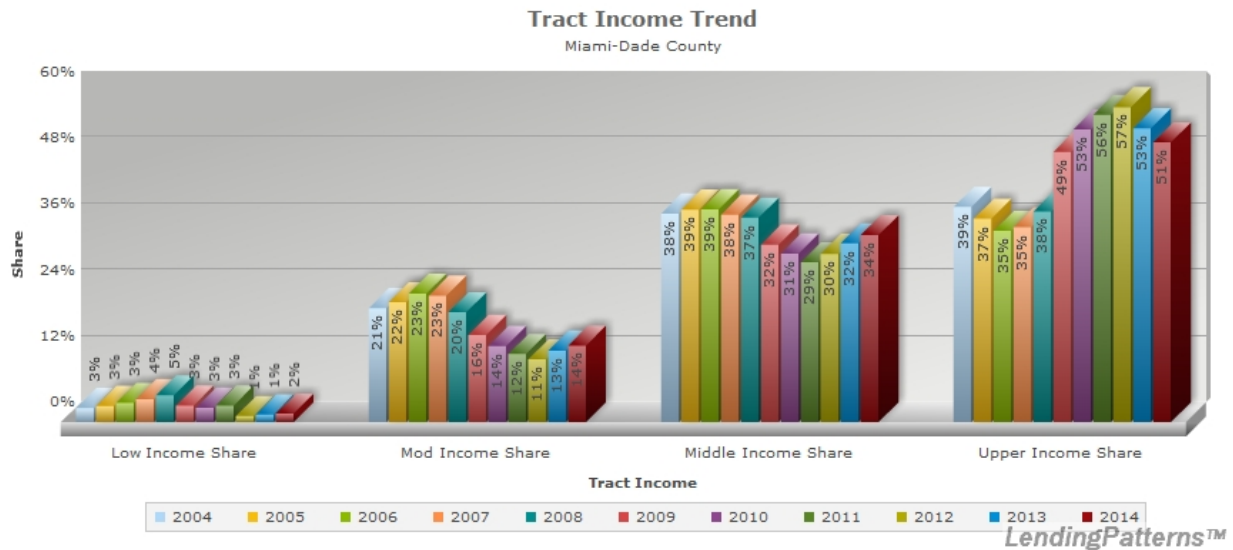
In the eleven-year period spanning 2004 to 2013, upper and middle income tracts had the highest number of applications. During the same period, moderate and low income tracts had the lowest numbers of applications.

Chart 6



Following this trend, in 2004, 2008, and 2009 through 2014, upper income tracts represented the largest share of applications. From 2005 to 2007, middle income tracts represented the largest share of applications, followed by moderate income tracts, then low income tracts.

Chart 7



HMDA reportable spread loans are loans with interest rates that are so much higher than the interest rate at which the typical homebuyer borrows, that the lender must report these high interest rate loans to the federal government. An analysis of LendingPatterns Spread Profile reports yielded the following conclusions:

2010 percentage of loans made to applicants by race and ethnicity that were HMDA reportable spread loans:

White: 2.71% (146 of 5,387 loans originated for White applicants)

Black: 8.32 % (115 of 1,383 loans originated for Black applicants)

Hispanic: 7.43% (811 of 10,922 loans originated for Hispanic applicants)

2010 Spread Profile Report:

	Loans	Loans w/Spread	%	Avg. Spread
White	5,387	146	2.71	2.25
Black	1,383	115	8.32	2.38
Hispanic	10,922	811	7.43	2.31
Asian	298	8	2.68	3.00
Native American	18	0	0.00	0.00
Hawaiian	27	2	7.41	2.22
MultiRace	30	1	3.33	1.52
Unk	1,797	29	1.61	2.26
NA	212	4	1.89	3.32
Invalid	0	0	0.00	0.00
Total	20,074	1,116	5.56	2.32

2011: percentage of loans made to applicants by race and ethnicity that were HMDA reportable spread loans:

White: 2.65% (149 of 5,623 loans originated for White applicants)

Black: 8.28 % (97 of 1,172 loans originated for Black applicants)

Hispanic: 4.90% (575 of 11,738 loans originated for Hispanic applicants)

2011 Spread Profile Report:

	Loans	Loans w/Spread	%	Avg. Spread
White	5,623	149	2.65	2.25
Black	1,172	97	8.28	2.41
Hispanic	11,738	575	4.90	2.27
Asian	333	6	1.80	2.59
Native American	18	0	0.00	0.00
Hawaiian	43	1	2.33	1.62
MultiRace	28	0	0.00	0.00
Unk	1,747	23	1.32	2.11
NA	468	3	0.64	2.47

Invalid	0	0	0.00	0.00
Total	21,170	854	4.03	2.28

2012: percentage of loans made to applicants by race and ethnicity that were HMDA reportable spread loans:

White: 2.66% (235 of 8,830 loans originated for White applicants)

Black: 7.68 % (146 of 1,901 loans originated for Black applicants)

Hispanic: 4.20% (812 of 19,318 loans originated for Hispanic applicants)

2012 Spread Profile Report:

	Loans	Loans w/Spread	%	Avg. Spread
White	8,830	235	2.66	2.13
Black	1,901	146	7.68	2.16
Hispanic	19,318	812	4.20	2.11
Asian	627	10	1.59	1.78
Native American	22	0	0.00	0.00
Hawaiian	30	0	0.00	0.00
MultiRace	64	0	0.00	0.00
Unk	2,637	50	1.90	1.92
NA	619	13	2.10	1.95
Invalid	0	0	0.00	0.00
Total	34,048	1,266	3.72	2.11

2013: percentage of loans made to applicants by race and ethnicity that were HMDA reportable spread loans:

White: 3.27% (290 of 8,864 loans originated for White applicants)

Black: 10.76 % (212 of 1,971 loans originated for Black applicants)

Hispanic: 7.37% (1,532 of 20,783 loans originated for Hispanic applicants)

2013 Spread Profile Report:

	Loans	Loans w/Spread	%	Avg. Spread
White	8,864	290	3.27	2.02
Black	1,971	212	10.76	2.05
Hispanic	20,783	1,532	7.37	1.95
Asian	648	24	3.70	1.99
Native American	32	2	6.25	2.41
Hawaiian	47	2	4.26	1.85
MultiRace	64	1	1.56	2.06
Unk	2,807	75	2.67	1.94
NA	774	31	4.01	1.93

Invalid	0	0	0.00	0.00
Total	35,990	2,169	6.03	1.97

2014: percentage of loans made to applicants by race and ethnicity that were HMDA reportable spread loans:

White: 6.17% (339 of 5,491 loans originated for White applicants)

Black: 22.07 % (343 of 1,554 loans originated for Black applicants)

Hispanic: 16.23% (2,510 of 15,467 loans originated for Hispanic applicants)

2014 Spread Profile Report:

	Loans	Loans w/Spread	%	Avg. Spread
White	5,491	339	6.17	2.14
Black	1,554	343	22.07	2.04
Hispanic	15,467	2,510	16.23	1.98
Asian	373	28	7.51	2.21
Native American	26	2	7.69	2.25
Hawaiian	23	0	0.00	0.00
MultiRace	48	3	6.25	1.79
Unk	1,643	91	5.54	2.44
NA	736	78	10.60	3.12
Invalid	0	0	0.00	0.00
Total	25,361	3,394	13.38	2.05

The Spread Profile Reports above showed that, on average for the 2010-2014 period, 11.42% of loans to Black applicants, 8.03% of those to Hispanics and only 3.49% of those to Whites had these very high interest rates.

According to the Consumer Financial Protection Bureau, interest rates are supposed to be based solely on such factors as:

1. Credit score
2. Home location (i.e., the state in which a home is located and if rural or urban)
3. Home price and loan amount
4. Down payment
5. Loan term
6. Interest rate type (fixed or adjustable)
7. Loan type (conventional, VA and FHA)

The Spread Profile Report data suggests that, on average, Black and Hispanic borrowers experience disparate treatment compared to Whites when it comes to getting a HMDA reportable

spread loan. **Stephen L. Ross wrote an article** in **August** 2014 about a study of home loans during the height of foreclosure crisis in which he said,

Minority homebuyers, especially black homebuyers, tend to face a higher cost of mortgage credit and had substantially worse credit market outcomes during the recent downturn than white homebuyers with equivalent mortgage risk factors.

LendingPatterns Lender Disparity Profile Reports provide HMDA data wherein White applicants' data is used as a baseline against which to measure the treatment of several races and ethnicities, including Black, Hispanic and "Unknown/Not Applicable" applicants. This analysis looks at Origination Disparity Index (ODI), Denial Disparity Index (DDI) and Fallout Disparity Index (FDI) as regards the above-listed four race/ethnicity categories.

ODI is a measure of the rate at which applicants of various races and ethnicities (in this case, Black, Hispanic and Unknown/NA) have their loans originated as compared to White applicants.

DDI is a measure of the rate at which applicants of the three groups mentioned above have their loans denied as compared to White applicants.

FDI is a measure of the rate at which applicants of the three groups, as compared to White applicants, who have proceeded up to an advanced stage of application, having gotten a locked-in interest rate, do not continue with the loan process all the way to closing, as compared to White applicants. The authors of the LendingPatterns User Guide wrote, "A significant variation in FDI by prohibited basis could suggest screening, differential processing, HMDA Action mis-classification and potential of discouragement of minority applications."

2010

Percentage of applications originated by race and ethnicity:

White: 48.44%
Black: 41.00% (1.18 DDI)
Hispanic: 48.34%
Unknown/NA: 37.02% (1.31 ODI)

Percentage of applications denied by race and ethnicity:

White: 27.06%
Black: 34.66% (1.28 DDI)
Hispanic: 28.98%
Unknown/NA: 31.29% (1.16 DDI)

Percentage of applications that fall out of the lender's pipeline by race and ethnicity:

White: 24.50%
Black: 24.34%

Hispanic: 22.67%
Unknown/NA: 31.69% (1.29 FDI)

2011:

Percentage of applications originated by race and ethnicity:

White: 51.85%
Black: 42.56% (1.22 DDI)
Hispanic: 52.38%
Unknown/NA: 45.18% (1.15 ODI)

Percentage of applications denied by race and ethnicity:

White: 24.46%
Black: 32.22% (1.32 DDI)
Hispanic: 26.26%
Unknown/NA: 26.23% (1.07 DDI)

Percentage of applications that fall out of the lender's pipeline by race and ethnicity:

White: 23.69%
Black: 25.12%
Hispanic: 21.36%
Unknown/NA: 28.59% (1.21 FDI)

2012:

Percentage of applications originated by race and ethnicity:

White: 56.43%
Black: 50.65%
Hispanic: 57.48%
Unknown/NA: 48.00% (1.18 ODI)

Percentage of applications denied by race and ethnicity:

White: 22.32%
Black: 27.92% (1.25 DDI)
Hispanic: 23.98%
Unknown/NA: 24.78% (1.11 DDI)

Percentage of applications that fall out of the lender's pipeline by race and ethnicity:

White: 21.25%
Black: 21.42%
Hispanic: 19.33%
Unknown/NA: 27.22% (1.28 FDI)

2013:

Percentage of applications originated by race and ethnicity

White: 54.72%

Black: 46.60% (1.17 ODI)

Hispanic: 54.88%

Unknown/NA: 45.14% (1.21 ODI)

Percentage of applications denied by race and ethnicity:

White: 22.63%

Black: 30.12% (1.33 DDI)

Hispanic: 23.98%

Unknown/NA: 26.69% (1.18 DDI)

Percentage of applications that fall out of the lender's pipeline by race and ethnicity:

White: 22.65%

Black: 23.29%

Hispanic: 21.14%

Unknown/NA: 28.17% (1.24 FDI)

2014:

Percentage of applications originated by race and ethnicity

White: 51.28%

Black: 41.37% (1.24 ODI)

Hispanic: 54.03%

Unknown/NA: 46.49%

Percentage of applications denied by race and ethnicity:

White: 24.92%

Black: 34.27% (1.38 DDI)

Hispanic: 24.90%

Unknown/NA: 27.30%

Percentage of applications that fall out of the lender's pipeline by race and ethnicity:

White: 23.80%

Black: 24.36%

Hispanic: 21.07%

Unknown/NA: 26.21%

Average: 2010 - 2014

Percentage of applications originated by race and ethnicity:

White: 52.54%

Black: 44.43% (1.16 DDI)

Hispanic: 52.54%
Unknown/NA: 44.09%

Percentage of applications denied by race and ethnicity:

White: 24.27%
Black: 31.83% (1.29 DDI)
Hispanic: 25.62%
Unknown/NA: 27.26%

Percentage of applications that fall out of the lender's pipeline by race and ethnicity:

White: 23.18%
Black: 23.70%
Hispanic: 21.11%
Unknown/NA: 28.38%

The above cited data from Lender Disparity Profile reports reveal that lenders originate significantly fewer loans for Black and "unknown race" applicants than Whites, deny significantly more Black than White loan applicants, and report people of "unknown" race as having chosen not to follow through with approved loans with locked rates more often than White applicants. Although this data does is not unequivocally indicative of discrimination, it clearly shows differential, inferior treatment of Black and "unknown" race applicants.

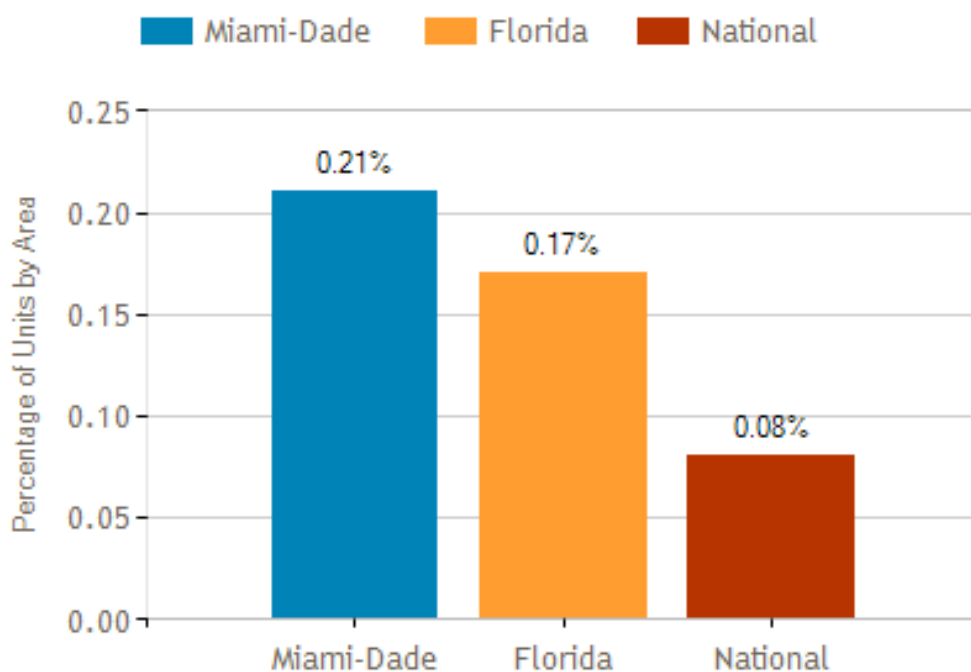
While HMDA is essential for understanding the mortgage climate, it should be noted that HMDA data does have its limitations. In particular, it does not take into consideration how the loan decisions were made. These and other issues must be taken into consideration when drawing conclusions about the findings. The data does, however, provide information about possible trends in the County's mortgage lending. The 2004-2014 HMDA data clearly shows a trend with respect to the high levels of denials of loans to Black and Hispanic applicants. Further, while Black and Hispanic applicants had lower rates of loan origination, they consistently had the highest percentage of high cost loans and the most expensive of high cost loans.

Foreclosure Data

A March 26, 2015 Miami Herald article indicated that home foreclosures were down in Miami-Dade at the start of 2015. The article indicated that county foreclosures dropped to almost half of the levels to which they had climbed twelve months earlier. The percentage of county homes in foreclosure in January 2015 was 4.38% compared to 8.22% in January 2014. The January 2014 rate of 4.38% was also down from the December 2014 rate of 4.63%. RealtyTrac reported that the rate of Miami-Dade foreclosures in August 2015 was 1 for every 473 homes. The Miami-Dade County Clerk of Courts website reported that the total number of foreclosure filings during the first 8 months of 2015 totaled 7,179 for an average of 598 foreclosure filings per month in the county. This is a sharp decrease in the average monthly foreclosure filings for the county of 777 per month for 2014 and 1,392 per month for 2013. The Miami-Dade County Real Estate Market Report, 2015:

Q1 indicated that the 1,643 foreclosures filed with the county Clerk of the Courts in the first quarter of 2015 was less than the number a month earlier by 18.5% and less than the figures from the prior year. The report proposed that these were signs that the foreclosure crisis was diminishing.

Despite these decreases in county foreclosures, RealtyTrac reported in August 2015 that Miami-Dade's foreclosures, as a percentage of units by area, were far greater than the national average (see chart below).

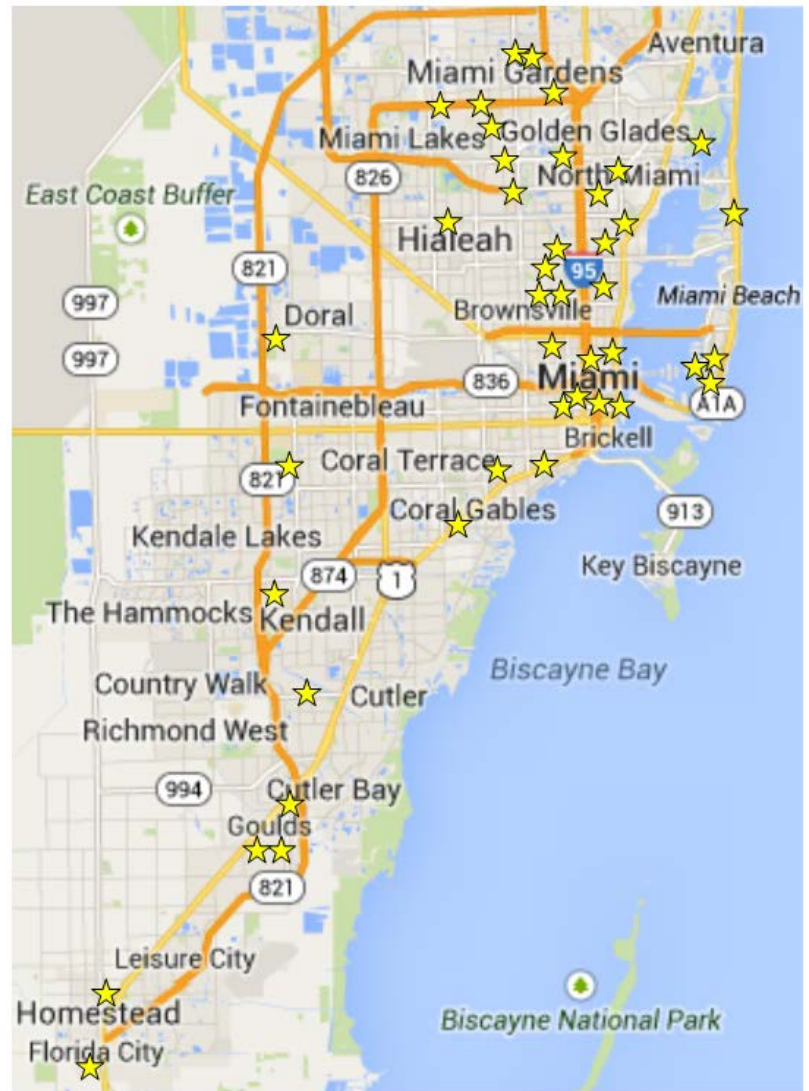


Fair Housing Implications: Significant disparities in lending practices indicate a need for industry training in Fair Housing and Fair Lending laws and consumer protection education regarding lending processes and avoiding abusive practices.

VI. Public Outreach- Resident Surveys

From August to November of 2015, HOPE surveyed 560 people regarding their fair housing knowledge to evaluate outreach and education needs. Participants were from across Miami-Dade County, across a range of ethnicities and races, and included persons with children, students, persons with disabilities, housing seekers, and housing providers. The survey was conducted in the following places:

Barry University, Miami Shores
Betty Ferguson Center, Miami Gardens
Behavioral Science Research, Coral Gables
Concerned African Women, Miami Gardens
Centro Campesino, Florida City
[Gwen] Cherry Park, Miami
CBT College, Miami Gardens
COPE Center, Coral Reef
Coordinated Victims Assistance Center, Miami
Dade Legal Aid, Miami
Exposition and Fairgrounds, Miami
FIU Biscayne Bay Campus, North Miami
Florida Technical College, Cutler Bay
Florida New Majority, Miami
Gang Alternative, Miami
Goulds Park, Goulds
Haitian American CDC, Miami
Hadley Park, Miami
Hialeah High School, Hialeah
Jackson High School, Miami
Legal Services of Greater Miami, Miami
Miami Beach City Hall, Miami Beach
Miami Beach Community Church, Miami Beach
Miami Dade College – Homestead, Homestead
Miami Dade College – InterAmerican, Miami
Miami Dade College – Kendall, Miami
Miami Dade College – North, Miami
Miami Dade College – West, Doral
Miami Dade College – Wolfson, Miami
Miami Workers Center, Miami
NANAY, North Miami
New Birth Baptist Church, Miami
New Jerusalem Church, Miami
Neighborhood Housing Services, Miami
Norland High School, Miami Gardens
North Shore Open Space Park, Miami Beach
Sherbondy Park, Opa-locka
South Beach Service Center, Miami Beach
South Miami Dade Government Center, Cutler Bay
St. Thomas University, Miami Gardens
University of Miami, Coral Gables
Vision to Victory, Miami
Wynwood Service Center, Miami



Questions, correct answers (where applicable), and rates of responses:

1. Regardless of the law, do you think landlords should be able to say that they prefer Christian tenants?
Yes/no/no opinion
Responses: Yes 6%, no 83%, no opinion 11%, no response given 0%
2. Regardless of the law, should a landlord be able to charge an extra deposit because someone wants to move in with a service animal? Yes/no/no opinion
Responses: Yes 0%, no 100%, no opinion 0%, no response given 0%
3. Regardless of the law, should a homeowners association be able to deny couples because they're gay?
Yes/no/no opinion
Responses: Yes 1%, no 98%, no opinion 1%, no response given 0%
4. Regardless of the law, should a bank reasonably use past experiences with Hispanic borrowers to predict the actions of future Hispanic borrowers? Yes/no/no opinion
Responses: Yes 2%, no 88%, no opinion 10%, no response given 0%
5. Is it legal to deny somebody housing simply because he uses a Section 8 voucher? Yes/no/not sure
Not legal, under Miami-Dade law. Responses: Yes 37%, no 49%, not sure 14%, no response given 0%
6. Is it legal to deny somebody housing simply because of her criminal background? Yes/no/not sure
Yes, this is legal. Responses: Yes 54%, no 32%, not sure 10%, no response given 4%
7. Is it legal to deny somebody housing simply because she has HIV? Yes/no/not sure
Not legal, under Florida law. Responses: Yes 25%, no 54%, not sure 20%, no response given 1%
8. Is it legal for a realtor to help by trying to show people houses near other people of their same race?
Yes/no/not sure
Not legal, under Federal law. Responses: Yes 33%, no 48%, not sure 19%, no response given 0%
9. Is it legal for a landlord to keep families with young children out of units with balconies, for safety?
Yes/no/not sure
Not legal, under Federal law. Responses: Yes 34%, no 40%, not sure 26%, no response given 0%
10. Have you faced any discrimination when looking for housing (renting or buying)? Yes/no/not sure
If yes, what do you think was the reason; and what did you do (and if nothing, why nothing)?
Responses: Yes 17%, no 78%, not sure 5%, no response given 0%
Reasons given included having children, race, criminal background, and credit score
11. What language(s) do you speak at home, other than English?
"N/A" or "none" or "only English" 6%
All other responses 23%
No response given 71%
Responses included Spanish, Creole, French, Arabic, German, Mandarin, Portuguese, and Italian

The surveys reveal the need for education and outreach. By the responses to question number 1, almost a fifth of the people surveyed (17%) are either in agreement with or indifferent to advertising for housing that clearly favors a religion. This is in direct violation of the Fair Housing Act's prohibition of taking religion into account in such advertisement, but a large number of people don't mind, or even support it. It is significant, then, to do outreach so that home-seekers understand their rights, in the possible event that a local housing provider unlawfully uses religion as a qualifying test for housing that is otherwise open to the public. Additionally, the responses to questions 5 through 9 showed that, in these instances, only about half or fewer of those surveyed (49%, 54%, 54%, 48%, and 40%, respectively) were correct about what is legal and what is not. Outreach is important with these results in mind for BOTH home-seekers (to increase awareness of their rights) and housing providers (to increase awareness of their responsibilities).

VII. CONCLUSIONS & RECOMMENDATIONS

A. Identified Impediments to Fair Housing Choice 2015

1. Violations of Federal, State, and Local Fair Housing Laws
2. The Need for On-Going Fair Housing Education & Outreach Efforts to Reach the County's Growing, Diverse Population
3. High levels of segregation
4. Shortage of/Barriers to Affordable Housing & Homeownership
5. Issues Affecting Persons with Disabilities and the Homeless
6. Lack of Knowledge of Fair Housing Protections and Redress under Fair Housing Laws
7. Fair and Equal Lending Disparities

B. Recommended Fair Housing Action Plan

Violations of Federal, State, and Local Fair Housing Laws

- | | |
|-------------|---|
| Strategy 1: | Develop referral process for Fair Housing Complaints that includes contact information to all private and public enforcement agencies. |
| Strategy 2: | Provide fair housing education and training to housing providers (including condominium associations) to foster compliance with federal, state, and local laws. |
| Strategy 3: | Continue to review the County's ordinance for the consideration of enhanced protections under the local law; Take steps to make the local law "substantially equivalent" to the Federal Fair Housing Act. |

- Strategy 4: Acknowledge the need for county-wide cooperation to eliminate barriers to fair housing choice; Provide the leadership for development of specific inter-jurisdictional cooperative mechanisms to make fair and equal access to housing a reality.
- Strategy 5: Continue providing fair housing training to all County employees; Develop mandatory fair housing training modules and schedules to ensure the education of new employees and re-training/up-dating of existing employees.

Continued Need for On-Going Fair Housing Education & Outreach Efforts to Reach the City's Growing, Diverse Population

- Strategy 1: Provide fair housing training at all housing-related workshops, including those for persons with limited English proficiency.
- Strategy 2: Support intensive efforts to educate advocates and consumers about their rights and responsibilities under fair housing laws.
- Strategy 3: Provide training to the County's governing body to ensure that they are aware of the County's mandated obligation to affirmatively further fair housing and its application to all housing and housing-related activities in its jurisdiction, whether publicly or privately funded.
- Strategy 4: Provide fair housing training to all employees and develop mandatory fair housing training modules and schedules to ensure the education of new employees and re-training/up-dating of existing employees.
- Strategy5: Provide fair housing training at all housing-related workshops in English, Spanish and Creole.
- Strategy 6: Support intensive efforts to educate advocates and consumers about their rights and responsibilities under fair housing laws in English, Spanish and Creole.

High levels of segregation

- Strategy 1: Support/fund fair housing testing of real estate agents, rental housing providers, lending institutions, and mortgage brokers doing business in the jurisdiction in order to detect discrimination that may be prevalent in particular neighborhoods, rental communities, or condominium/homeowner associations.
- Strategy 2: Support intensive efforts to educate the public about the existence and assets of racially diverse neighborhoods in order to overcome stereotypes among both minority and white home-seekers.
- Strategy 3: Expand affordable housing options in exclusive neighborhoods by exploring inclusionary zoning strategies and strategies that help low-income families with Housing Choice vouchers to move into opportunity-rich neighborhoods.
- Strategy 4: Continue to evolve affirmative marketing efforts to reach additional residents in various languages and monitor affirmative marketing efforts of sub-recipients, where appropriate.

Shortage of/Barriers to Affordable Housing & Homeownership

- Strategy 1: Continue to require and monitor affirmative marketing plans for all affordable housing developments.
- Strategy 2: Support and fund pre- and post-purchase counseling and down payment and closing cost assistance mechanisms for residents.
- Strategy 3: Continue to work in cooperation with other jurisdictions for the provision of economic opportunity.

Issues Affecting Persons with Disabilities and the Homeless

- Strategy 1: Support and monitor the Miami-Dade PHCD's on-going effort to comply with Section 504 requirements to significantly increase the quality and quantity of accessible housing units throughout the jurisdiction.
- Strategy 2: Endorse, fund and participate in the implementation of plans to eliminate homelessness and increase affordable housing alternatives fostered by the Homeless Trust and other advocacy groups.

Lack of Knowledge of Fair Housing Protections and Redress under Fair Housing Laws

- Strategy 1: Conduct a public relations campaign promoting knowledge of fair housing laws and assistance programs, including but not limited to print ads, public service announcements, and community forums on Cable TV.
- Strategy 2: Dedicate a portion of the County's website to Fair Housing, with links to websites and information about filing fair housing complaints and compliance (federal, state and local entities); Develop online survey to determine the public's knowledge of fair housing laws, means of redress, and levels of perceived discriminatory practices by providers.

Fair and Equal Lending Disparities

- Strategy 1: Continue to educate residents through first-time homebuyer workshops on the identification of predatory lending practices and where to receive assistance if victimized by predatory lending practices.
- Strategy 2: Provide financial support for anti-predatory lending initiatives.
- Strategy 3: Require and monitor annual reports from lenders participating in County's housing programs that compare all home loan decisions (originations, approvals, denials) sorted by race/ethnicity.
- Strategy 4: Continue to evolve Affirmative Marketing efforts to reach additional residents in various languages in all program areas.
- Strategy 5: Initiate and support mass media campaigns promoting fair lending, including but not limited to, print ads, public service announcements, and community forums on cable TV and the County's website.

VIII. Signature Page

Reviewed and accepted this _____ day of _____, 2015.

By:

Miami-Dade County
Chief Elected Official