



2024

Analysis of Impediments to Fair Housing Choice

Public Housing and Community Development  
and Regulatory and Economic Resources  
Departments; Planning Research and Economic  
Analysis Section

March 12, 2024

# Table of Contents

- I. INTRODUCTION..... 3
  - A. Analysis of Impediments Background ..... 3
  - B. Entity Conducting the Analysis of Impediments ..... 3
  - C. Methodology ..... 4
  - D. Funding..... 5
  - E. Fair Housing Planning History..... 5
  - F. Summary of Actions Taken Since Completion of 2015 AI ..... 5
- II. JURISDICTIONAL AND COMMUNITY PROFILE..... 10
  - A. History & Government Structure ..... 10
  - B. Population, Age, Race, Ethnicity, National Origin..... 14
  - C. Geographic Diversity and Segregation of Racial Groups ..... 16
  - D. Income ..... 22
  - E. Employment ..... 26
  - F. Transportation and Commuting ..... 27
- III. HOUSING PROFILE ..... 29
  - A. Housing by Tenure..... 29
  - B. Housing Affordability ..... 29
  - C. Housing Needs of Disabled Persons..... 31
  - D. Homelessness..... 33
  - E. Public Housing & Assisted Housing..... 36
  - F. Housing Programs ..... 39
  - G. Planning & Zoning/Building Codes (Accessibility) ..... 51
- IV. JURISDICTION’S FAIR HOUSING PROFILE..... 53
  - A. Fair Housing Laws, Agencies and Fair Housing Complaint Data..... 53
  - B. Fair Housing Litigation..... 58
    - A. Introduction..... 59
    - B. HMDA Data Analysis ..... 59
    - C. Foreclosure Data ..... 66
- V. PUBLIC OUTREACH..... 70
- VI. CONCLUSIONS & RECOMMENDATIONS..... 72
  - A. Identified Impediments to Fair Housing Choice..... 72
  - B. Recommended Fair Housing Action Plan ..... 72
- VII. WORKS CITED..... 76

## ***I. INTRODUCTION***

### **A. Analysis of Impediments Background**

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.

### **B. Entity Conducting the Analysis of Impediments**

Miami-Dade County Public Housing and Community Development (PHCD), in collaboration with Miami-Dade County Regulatory and Economic Resources is conducting the Analysis of Impediments to Fair Housing Choice (AI).

## C. Methodology

The methodology in undertaking this Analysis of Impediments to Fair Housing Choice (AI) 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 from the Consumer Finance Protection Bureau (CFPB).
- Review of the Florida Housing Data Clearinghouse database and granular foreclosure data Attom Data Solutions (formerly 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*

- 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.

## **D. Funding**

The project was funded through an administrative contract between the Miami-Dade County and the Research and Economic Analysis Section in the Planning Division of the Regulatory and Economic Resources Department. Community Development Block Grant planning and administration funds were utilized in funding this effort.

## **E. Fair Housing Planning History**

HOPE, Inc conducted the 1996, 2004 and 2010 Miami-Dade County *Analysis of Impediments to Fair Housing Choice*. The 2015 *Analysis* identified the following impediments to fair housing choice in Miami-Dade County:

### *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 and Outreach Efforts to Reach the County's Growing, Diverse Population
3. High levels of segregation
4. Shortage of/Barriers to Affordable Housing and 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

## **F. Summary of Actions Taken Since Completion of 2015 AI**

Miami-Dade County and Housing Opportunities Project for Excellence (HOPE), Inc., conducted and submitted the *Analysis of Impediments to Fair Housing Choice* for Miami- Dade County in 2015. Since 2016, Miami-Dade County Public Housing and Community Development and Regulatory and Economic Resources Departments have identified housing needs within Miami-Dade County.

Separately, HOPE, Inc. informs the 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 summarizes the activities undertaken in 2022 to assist in addressing impediments to fair housing choice identified in the 2015 AI:

**1<sup>st</sup> Quarter Fair Housing and Predatory Lending Presentations** (conducted in English, unless otherwise noted):

- Centro Campesino, Florida City: 1/15/22, 1/29/22, 2/12/22, 2/26/22, 3/12/22, 3/26/22
- Cuban American National Council (Spanish), Little Havana: 1/14/22, 1/28/22, 2/11/22, 2/25/22, 3/11/22, 3/25/22
- Cushman School, Morningside: 2/15/22
- Experts Resource Community Center/NID (English, Spanish, and Creole), Miami Gardens & North Miami: 1/8/22, 1/22/22, 2/12/22, 2/26/22, 3/12/22, 3/26/22
- Gang Alternative, Little Haiti: 1/27/22
- Haitian American CDC, Little Haiti: 1/28/22, 3/25/22
- Housing Foundation of America (English & Spanish), Miami Gardens & Palmetto Bay: 1/22/22, 1/29/22, 2/12/22, 2/19/22, 3/5/22, 3/19/22
- iPrep Academy, Edgewater: 2/4/22
- Neighborhood Housing Services (English, Spanish, and Creole), Little Havana: 1/6/22, 1/14/22, 2/3/22, 2/17/22, 2/25/22, 3/23/22, 3/24/22, 3/25/22
- Opa-locka CDC (English & Spanish), Opa-locka: 1/29/22, 2/19/22, 3/26/22
- Real Estate, Education and Community Housing (English & Spanish), Kendall: 1/15/22, 1/29/22, 2/5/22, 2/26/22, 3/5/22, 3/26/22
- Trinity Empowerment (English & Spanish), Goulds: 1/15/22, 2/19/22, 3/19/22
- University of Miami School of Law, Coral Gables: 2/7/22, 2/28/22
- YWCA of South Florida, Overtown: 1/11/22

**Provider Presentations:**

- Coordinated Victims Assistance Center, Coconut Grove: 1/26/22
- Florida International University, Job Fair, University Park: 3/17/22
- Miami Dade College Homestead, Job Fair, Homestead: 3/10/22
- Miami Dade College Kendall, Job Fair, Kendall: 3/29/22
- Miami Dade College Padron, Job Fair, Little Havana: 3/23/22
- University of Miami School of Law, Job Fair, Coral Gables: 3/9/22

**Community Fairs:**

- Barry University, Housing Panel, Miami Shores: 1/19/22
- South Shore Community Center, Food Distribution, South Beach: 1/20/22

**2<sup>nd</sup> Quarter Fair Housing and Predatory Lending Presentations** (conducted in English, unless otherwise noted):

- Centro Campesino (English & Spanish), Florida City: 4/9/22, 4/23/22, 5/14/22, 5/28/22, 6/25/22
- Coral Way K-8 Center, Shenandoah: 4/21/22
- Cuban American National Council (English & Spanish), Little Havana: 4/1/22, 4/8/22, 4/22/22, 5/6/22, 5/20/22
- Experts Resource Community Center/NID (English, Spanish, and Haitian Creole), Miami Gardens & North Miami: 4/9/22, 4/23/22, 5/14/22, 5/28/22, 6/25/22
- Helios Biblios Hour, BlogTalkRadio: 5/8/22
- Haitian American CDC, Little Haiti: 5/27/22
- Housing Foundation of America (English & Spanish), Miami Gardens & Palmetto Bay: 4/9/22, 4/23/22, 5/14/22, 5/21/22, 6/25/22
- (City of) Miami Beach Parents Meetings, North Beach & South Beach: 4/5/22, 4/7/22
- Neighborhood Housing Services (English, Spanish, and Haitian Creole), Little Havana: 4/14/22, 4/20/22, 5/19/22, 5/26/22, 6/24/22
- Opa-locka CDC (English & Spanish), Opa-locka: 4/30/22, 5/14/22, 6/18/22
- Real Estate, Education and Community Housing (English & Spanish), Kendall: 4/2/22, 4/23/22, 5/7/22, 5/21/22, 6/25/22
- South Dade Cares Coalition, Homestead: 4/7/22
- South Dade One Voice Community Coalition, Cutler Bay: 4/8/22
- Trinity Empowerment (English & Spanish), Goulds: 4/16/22, 5/21/22
- University of Miami School of Law, Coral Gables: 4/14/22

**Provider Presentations:**

- CNC Management, Little Havana: 4/21/22
- Neighborhood Housing Services, Little Havana: 4/11/22

**Community Fairs:**

- South Shore Community Center, South Beach: 6/7/22

**3<sup>rd</sup> Quarter Fair Housing and Predatory Lending Presentations** (conducted in English, unless otherwise noted):

- Centro Campesino, Florida City: 7/30/22, 8/13/22, 8/27/22, 9/10/22, 9/24/22
- Cuban American National Council (Spanish), Little Havana: 7/15/22, 7/27/22, 7/29/22, 8/12/22, 8/30/22, 9/9/22, 9/14/22, 9/30/22
- Experts Resource Community Center/NID (English, Spanish, and Creole), Miami Gardens & North Miami: 8/13/22, 8/27/22, 9/10/22, 9/24/22
- Haitian American CDC, Little Haiti: 7/29/22, 9/23/22, 9/30/22
- Housing Foundation of America (English & Spanish), Miami Gardens & Palmetto Bay: 7/30/22, 8/20/22, 9/10/22, 9/24/22
- Neighborhood Housing Services (English, Spanish, and Creole), Little Havana: 8/20/22, 9/13/22
- Opa-locka CDC (English & Spanish), Opa-locka: 7/30/22, 8/27/22, 9/24/22
- Real Estate, Education and Community Housing (English & Spanish), Kendall: 7/30/22, 8/6/22, 8/27/22, 9/24/22
- Temple Beth Am, Pinecrest: 9/11/22
- Trinity Empowerment (English & Spanish), Goulds: 8/20/22, 9/17/22
- University of Miami School of Law, Coral Gables: 9/8/22, 9/27/22, 9/29/22

**Provider Presentations:**

- Asden Properties, Little Havana: 7/26/22
- Town Park Village, Overtown: 8/8/22

**Community Fairs:**

- Hialeah Community Resource Center, Hialeah: 7/11/22

**4<sup>th</sup> Quarter Fair Housing and Predatory Lending Presentations** (conducted in English, unless otherwise noted):

- Centro Campesino (English & Spanish), Florida City: 10/8/22, 10/22/22, 11/5/22, 11/19/22, 12/3/22, 12/17/22
- Cuban American National Council (English & Spanish), Little Havana: 10/14/22, 10/19/22, 10/28/22, 11/4/22, 11/10/22, 11/18/22, 12/2/22, 12/16/22, 12/21/22

- Experts Resource Community Center/NID (English, Spanish, and Haitian Creole), Miami Gardens & North Miami: 10/8/22, 10/22/22, 11/12/22, 12/10/22, 12/17/22
- Healthy Little Havana, Little Havana: 11/1/22
- Haitian American CDC, Little Haiti: 10/21/22, 12/9/22
- Housing Foundation of America (English & Spanish), Miami Gardens & Palmetto Bay: 10/15/22, 10/22/22, 11/5/22, 12/3/22, 12/10/22, 12/17/22
- (City of) Miami Beach Parents Meetings, North Beach & South Beach: 12/6/22, 12/8/22
- Neighborhood Housing Services (English, Spanish, and Haitian Creole), Little Havana: 10/6/22, 10/13/22, 10/22/22, 11/10/22, 11/17/22, 12/8/22, 12/10/22, 12/15/22, 12/17/22
- Opa-locka CDC (English & Spanish), Opa-locka: 10/29/22, 11/19/22, 12/17/22
- Real Estate, Education and Community Housing (English & Spanish), Kendall: 10/15/22, 11/5/22
- Southridge High School, South Miami Heights: 10/18/22
- Trinity Empowerment (English & Spanish), Goulds: 10/15/22, 11/19/22, 12/17/22
- University of Miami School of Law, Coral Gables: 11/14/22

**Provider Presentations:**

- Miami-Dade Gay and Lesbian Chamber of Commerce, Doral: 10/6/22
- Neighborhood Assistance Corporation of America, North Miami: 11/18/22

**Community Fairs:**

- Jackson High School, Health Fair, Allapattah: 11/17/22
- Jan Mann School, Health Fair, Opa-locka: 10/25/22
- MacArthur South, Health Fair, Homestead: 10/10/22
- Miami Beach Police Athletic League, Thanksgiving Event, North Beach: 11/19/22
- Miami Beach Regional Library, Community Tabling, South Beach: 11/16/22, 12/13/22
- (The) Mortgage Firm, Homebuyer Event, Miami Gardens: 10/29/22
- Norland High School, Health Fair, Miami Gardens: 10/21/22
- Northwestern High School, Health Fair, Liberty City: 11/9/22
- Sisters In Spirit, Community Love Fest, Overtown: 12/3/22
- South Shore Community Center, Community Tabling, South Beach: 11/16/22, 12/19/22
- Southridge High

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 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.

On April 9, 2019, the Miami-Dade Board of County Commissioners held a special presentation in recognition of Fair Housing Month. Commissioner Daniella Levine Cava presented a proclamation declaring April as Fair Housing Month. Ms. Daniella Pierre, representing the NAACP, thanked the Board of County Commissioners for the recognition and the county’s effort in eliminating housing discrimination. Ms. Robinson, Mr. Rob Collins and a representative from Miami Homes for All thanked the Board of County Commissioners for the recognition.

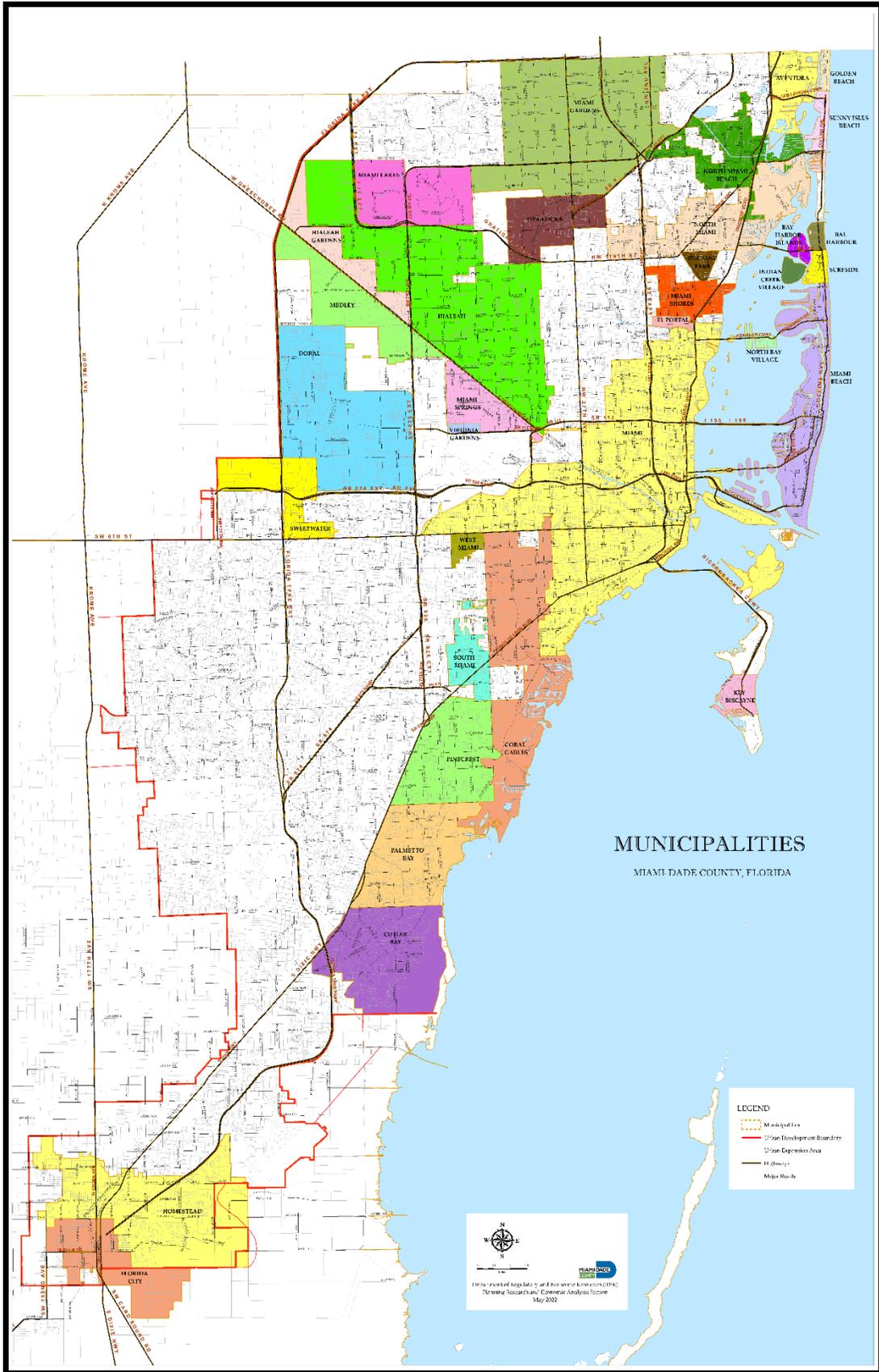
## ***II. JURISDICTIONAL AND COMMUNITY PROFILE***

### **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 2,662,777 in 2021, making it the most populous county in Florida and the seventh-most populous county in the United States. It is also Florida'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 Magic 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 establish the county as the North American gateway to Latin America and the Caribbean.

One of the top-ten-costliest natural disasters to occur in the United States was Hurricane Andrew, which hit Miami on August 24, 1992. Damages numbered over \$50 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, with terms limited at two-terms. 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, until January of 2025, 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. In January of 2025, the four will be reinstated in the county due to a constitutional amendment approved by Florida voters in 2018.

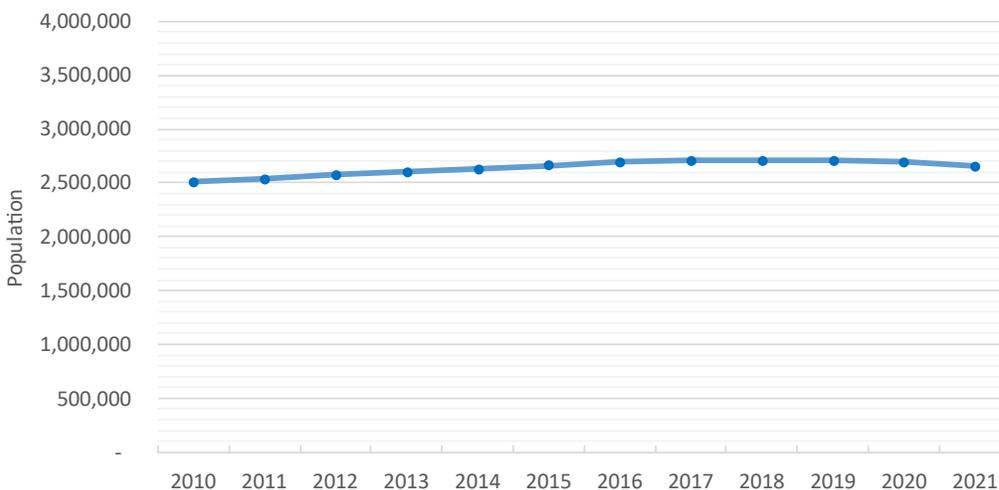
*Fair Housing Implication(s):*

*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, National Origin**

Population, age, race and ethnicity are important demand factors that influence choice and location within local housing markets. According to Census Bureau data, the population in Miami-Dade County has grown from 2,506,972 persons in July of 2010 to 2,662,777 persons in 2021, a total increase of 6.2 percent. This is shown in Figure 1, below. The county population peaked in 2019 according to the Census Bureau at 2,716,940 before dropping slightly the following two, possibly due to the impacts of the pandemic on migration and immigration patterns. However, county projections and state projections anticipate a return to the long-term growth trends pre-pandemic. The official county estimates project an annual population growth rate of 0.9% through 2040.

**Figure 1: Miami-Dade County Population, 2010 – 2021**



*Data source: U.S. Census Bureau Population Estimates Program*

Table 1, below, shows how the racial and ethnic breakdown of the county population changed between 2010 and 2021. Over that period, the county’s Hispanic population, which can be of any race, increased from 1,633,415 to 1,838,864 persons, The Hispanic share of the total population grew

from 65.2 percent to 69.1 percent. The non-Hispanic Black population decreased over this period from 431,649 persons to 382,195, as the share of the total decreased from 17.2 percent of the total to 14.4 percent. Likewise, the non-Hispanic White population also decreased and lost share, falling from 381,573 to 334,050 persons and from 15.2 percent to 12.5 percent of the total. The non-Hispanic Other races, which includes those persons reporting multiple races, nearly doubled in population, from 58,742 to 107,668 persons and the share grew from 2.3 percent to 4.0 percent.

**Table 2: Miami-Dade County Population by Race and Ethnicity, 2010 to 2021**

	2021	2020*	2019	2018	2017	2016	2015	2014	2013	2012	2011	2010
<b>All Races and Ethnicity</b>	2,662,777	-	2,716,940	2,761,581	2,751,796	2,712,945	2,693,117	2,662,874	2,617,176	2,591,035	2,554,766	2,505,379
<b>Hispanic</b>	1,838,864 69.1%	-	1,886,364 69.4%	1,907,130 69.1%	1,887,266 68.6%	1,835,413 67.7%	1,800,281 66.8%	1,762,598 66.2%	1,717,147 65.6%	1,666,528 64.3%	1,648,630 64.5%	1,633,415 65.2%
<b>Non-Hispanic White</b>	334,050 12.5%	-	347,010 12.8%	355,253 12.9%	360,449 13.1%	368,048 13.6%	381,160 14.2%	391,027 14.7%	392,990 15.0%	416,607 16.1%	407,706 16.0%	381,573 15.2%
<b>Non-Hispanic Black</b>	382,195 14.4%	-	416,126 15.3%	427,194 15.5%	434,406 15.8%	437,181 16.1%	448,936 16.7%	444,290 16.7%	440,764 16.8%	443,328 17.1%	437,737 17.1%	431,649 17.2%
<b>Non-Hispanic Other (Incl. Multiple)</b>	107,668 4.0%	-	67,440 2.5%	72,004 2.6%	69,675 2.5%	72,303 2.7%	62,740 2.3%	64,959 2.4%	66,275 2.5%	64,572 2.5%	60,693 2.4%	58,742 2.3%

\* Due to the Pandemic, the 2020 ACS 1-year Estimates were not released.

Data Source: American Community Survey, 1-year Estimates

According to the 2017-2021 American Community Survey 5-year estimates (2021 ACS), the county median age was 40.4 years. Almost a quarter, 22.8 percent of the population, was under 19 years old, 61.0 percent were 20 to 64 years old, and 16.2 percent were 65 years old and over. The county gender distribution was 51.1 percent females, and 48.9 percent males.

**Table 1: Miami-Dade County Nativity Status and Languages Spoken at Home**

	Total		Born in the U.S. or Native, Born outside the U.S.		Foreign-Born	
<b>Population 5-years and older:</b>	<b>2,537,130</b>		<b>1,092,270</b>		<b>1,444,860</b>	
<b>Speak only English</b>	631,013	24.9%	522,228	47.8%	108,785	7.5%
<b>Speak Spanish:</b>	1,687,005	66.5%	512,888	47.0%	1,174,117	81.3%
Speak English "very well"	897,495	53.2%	459,972	89.7%	437,523	37.3%
Speak English less than "very well"	789,510	46.8%	52,916	10.3%	736,594	62.7%
<b>Speak other languages:</b>	219,112	8.6%	57,154	5.2%	161,958	11.2%
Speak English "very well"	146,173	66.7%	53,562	93.7%	92,611	57.2%
Speak English less than "very well"	72,939	33.3%	3,592	6.3%	69,347	42.8%

Data Source: 2021 American Community Survey 5-year Estimates.

English proficiency can present a significant impediment to renters and homebuyers. The 2021 ACS reports that 57 percent of persons five-years of age and over living in the county were foreign born. See Table 2. Of these, over 81 percent speak Spanish at home and a majority (62.7 percent) speak English less than "very well." This represents 29 percent of the total county population over five-years of age. In addition, over 11 percent of the foreign-born population spoke some other language at home and 42.8 percent spoke English less than "very well." In total, there were 789,510 Spanish-speakers and 72,939 speakers of other languages in the county who speak

English less than “very well.” This represents more than one-third of the total county population 5-years and older.

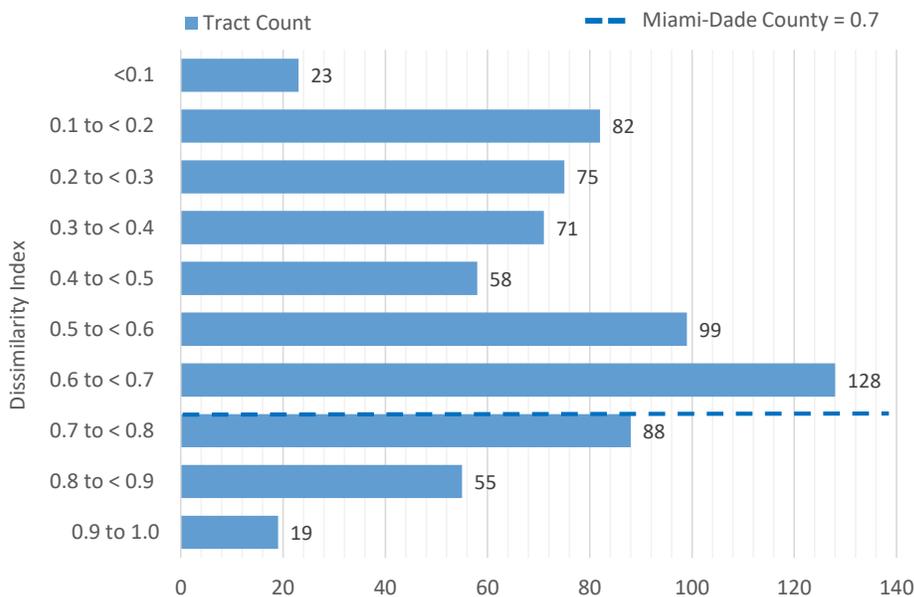
*Fair Housing Implications: These characteristics of the population indicate the need for on-going fair housing educational efforts. The presence of a significantly diverse population, with different languages and cultures and a large percent of people who were foreign born indicate the need for multi-lingual fair housing information and services.*

### C. Geographic Diversity and Segregation of Racial Groups

There are different approaches to measuring racial diversity or segregation across the county. One frequently used approach is the Dissimilarity Index. It measures segregation between racial groups, reflecting their relative distributions across neighborhoods within a metropolitan area or region. In this report, we use this index to simultaneously measure the diversity and segregation of multiple racial or ethnic groups within Miami-Dade County. Using the data derived from the 2021 ACS, three county groups by census tracts were measured, non-Hispanic White, non-Hispanic Black, and Hispanic populations.

The Index reveals whether a tract is very diverse - it contains all three groups roughly equally - or very segregated - individual groups live exclusively within a tract - or somewhere in between these two. The index assigns values ranging from 0 to 1.0. The higher an index score means the more diverse a tract is, and the lower an index score means the more segregated a tract is. A higher index score, e.g. 0.9 to 1.0 would have a more equal distribution, and an index score of less, 0.3 for example, would indicate a more segregated distribution.

*Figure 2: Miami-Dade County Dissimilarity Index by Census Tracts, 2021*

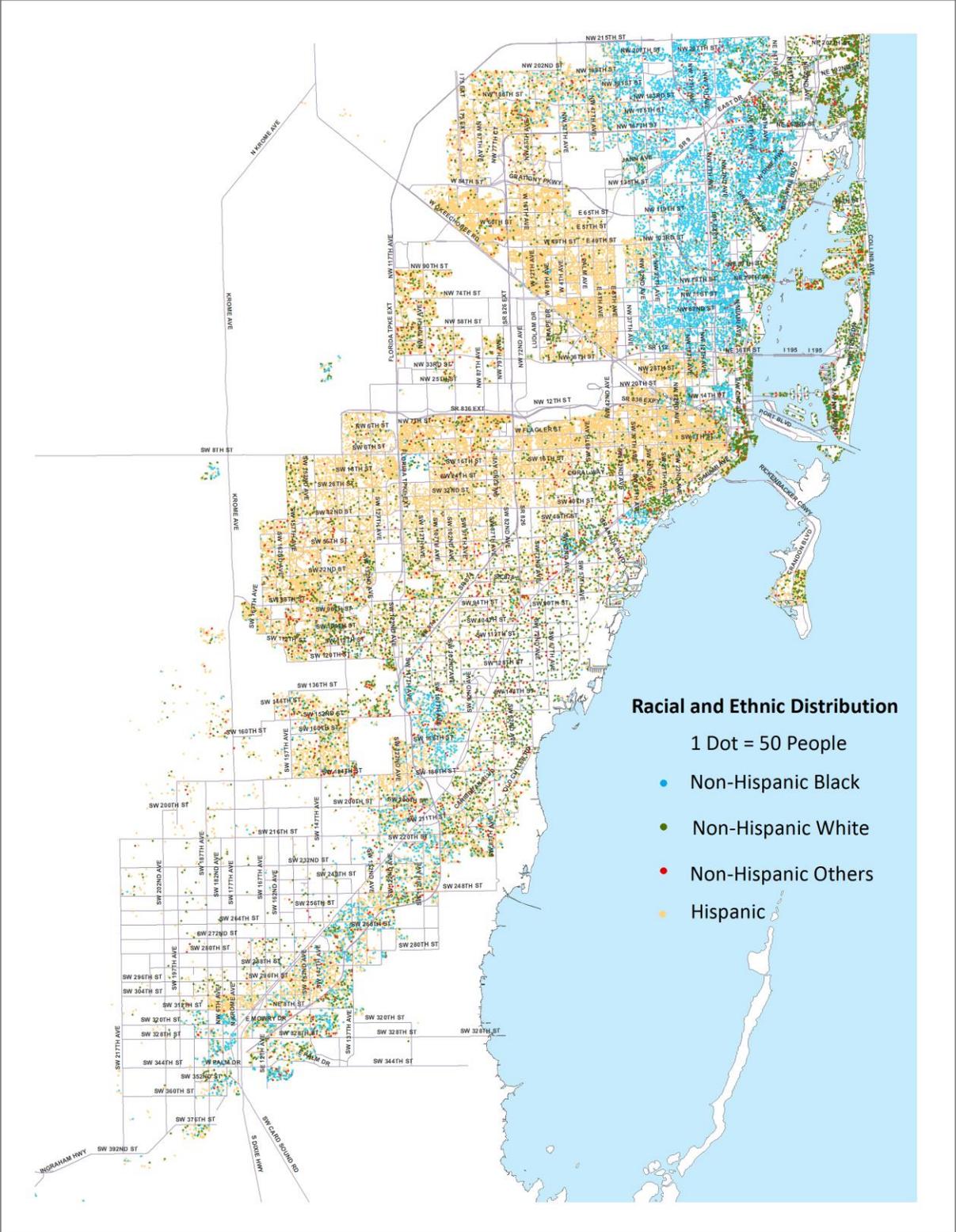


Data source: U.S. Census, American Community Survey, 2017-2021, 5-year Estimates

The countywide dissimilarity index score was 0.7 in 2021. However, there were 536 tracts (76.8 percent) with an index lower than the countywide index. Seventy-four census tracts (10.4 percent) scored higher than the countywide index. Therefore, while the total population of the county is fairly diverse, the typical census tracts fell right in the middle. However, more than one-quarter of the tracts had an index of less than 0.3, indicating a very high degree of segregation.

Another way of exploring segregation is by mapping the distribution of the population. Map 1 shows the distribution of the Hispanic (gold dots), non-Hispanic Whites (green dots) and non-Hispanic Blacks (blue dots) where each dot represents 50 residents. The areas that particularly stand out on the map are the north-central area of the county with a high concentration of non-Hispanic Blacks (blue), and the coastal communities that show a high concentration of non-Hispanic Whites (green). Much of the county is dominated by gold dots representing the Hispanic population which would be expected since they represent nearly 70 percent of the total county population.

Map 1: Miami-Dade County Racial and Ethnic Concentration by Census Tracts, 2021



Data source: U.S. Census, American Community Survey, 2017-2021, 5-year Estimates

## Household Characteristics

**Table 3: Miami-Dade County Households by Type**

	Households by Type				
	2021	2021 Percent	2016	2016 Percent	2016-21 % Changed
<b>Total Households</b>	<b>936,351</b>		<b>853,624</b>		<b>9.7%</b>
<b>Family Households:</b>	643,696	68.7%	581,051	68.1%	10.8%
Married-couple family	407,626	63.3%	369,169	63.5%	10.4%
Householder 15 to 64 years	318,338	78.1%	289,329	78.4%	10.0%
Householder 65 years and over	89,288	21.9%	79,840	21.6%	11.8%
Male or Female, no spouse present	236,070	36.7%	211,882	36.5%	11.4%
Householder 15 to 64 years	194,861	82.5%	178,699	84.3%	9.0%
Householder 65 years and over	41,209	17.5%	33,183	15.7%	24.2%
<b>Nonfamily Households:</b>	292,655	31.3%	272,573	31.9%	7.4%
Householder living alone	235,580	80.5%	225,303	82.7%	4.6%
Householder 15 to 64 years	142,771	60.6%	142,070	63.1%	0.5%
Householder 65 years and over	92,809	39.4%	83,233	36.9%	11.5%
Householder not living alone	57,075	19.5%	47,270	17.3%	20.7%
Householder 15 to 64 years	47,062	82.5%	40,115	84.9%	17.3%
Householder 65 years and over	10,013	17.5%	7,155	15.1%	39.9%
	Home-Owner Households				
	2021	2021 Percent	2016	2016 Percent	2016-21 % Changed
<b>Total Households</b>	<b>486,018</b>		<b>449,174</b>		<b>8.2%</b>
<b>Family Households:</b>	364,914	75.1%	333,094	74.2%	9.6%
Married-couple family	259,439	71.1%	241,520	72.5%	7.4%
Householder 15 to 64 years	189,168	72.9%	178,606	74.0%	5.9%
Householder 65 years and over	70,271	27.1%	62,914	26.0%	11.7%
Male or Female, no spouse present	105,475	28.9%	91,574	27.5%	15.2%
Householder 15 to 64 years	76,063	72.1%	68,428	74.7%	11.2%
Householder 65 years and over	29,412	27.9%	23,146	25.3%	27.1%
<b>Nonfamily Households:</b>	121,104	24.9%	116,080	25.8%	4.3%
Householder living alone	100,329	82.8%	97,275	83.8%	3.1%
Householder 15 to 64 years	48,841	48.7%	51,164	52.6%	-4.5%
Householder 65 years and over	51,488	51.3%	46,111	47.4%	11.7%
Householder not living alone	20,775	17.2%	18,805	16.2%	10.5%
Householder 15 to 64 years	14,024	67.5%	13,770	73.2%	1.8%
Householder 65 years and over	6,751	32.5%	5,035	26.8%	34.1%
	Rental Households				
	2021	2021 Percent	2016	2016 Percent	2016-21 % Changed
<b>Total Households</b>	<b>450,333</b>		<b>404,450</b>		<b>11.3%</b>
<b>Family Households:</b>	278,782	61.9%	247,957	61.3%	12.4%
Married-couple family	148,187	53.2%	127,649	51.5%	16.1%
Householder 15 to 64 years	129,170	87.2%	110,723	86.7%	16.7%
Householder 65 years and over	19,017	12.8%	16,926	13.3%	12.4%
Male or Female, no spouse present	130,595	46.8%	120,308	48.5%	8.6%
Householder 15 to 64 years	118,798	91.0%	110,271	91.7%	7.7%
Householder 65 years and over	11,797	9.0%	10,037	8.3%	17.5%
<b>Nonfamily Households:</b>	171,551	38.1%	156,493	38.7%	9.6%
Householder living alone	135,251	78.8%	128,028	81.8%	5.6%
Householder 15 to 64 years	93,930	69.4%	90,906	71.0%	3.3%
Householder 65 years and over	41,321	30.6%	37,122	29.0%	11.3%
Householder not living alone	36,300	21.2%	28,465	18.2%	27.5%
Householder 15 to 64 years	33,038	91.0%	26,345	92.6%	25.4%
Householder 65 years and over	3,262	9.0%	2,120	7.4%	53.9%

Data Source: 2016 and 2021 American Community Survey 5-year Estimates.

Data source: U.S. Census, American Community Survey, 2011-2016 and 2017-2021, 5-year Estimates

compared to 62 percent of renter households. The difference was similar in 2016, 74 percent versus 61 percent. And, among family owner-households, single parent households grew at twice the rate of married couple households, 15.2 percent compared to 7.4 percent. On the other hand, for renter

According to the 2011-2016 American Community Survey 5-Year Estimates (2016 ACS) and the 2021 ACS, there were an estimated 936,351 households in Miami-Dade County in 2021, averaging 2.83 people per household compared to 853,624 households in 2016, averaging 3.07 people per household. See Table 3. In 2021, 68.7 percent were *family* households up slightly from 68.1 percent in 2016. Married-couple families, accounted for 63.3 percent of family households, nearly unchanged from 2016. Single-parent households represented 36.7 percent of family households, nearly the same as seen in the 2016 data. However, among family households, single parent households grew faster between 2016 and 2021, 11.4 percent compared to 10.4 percent of married-couple households.

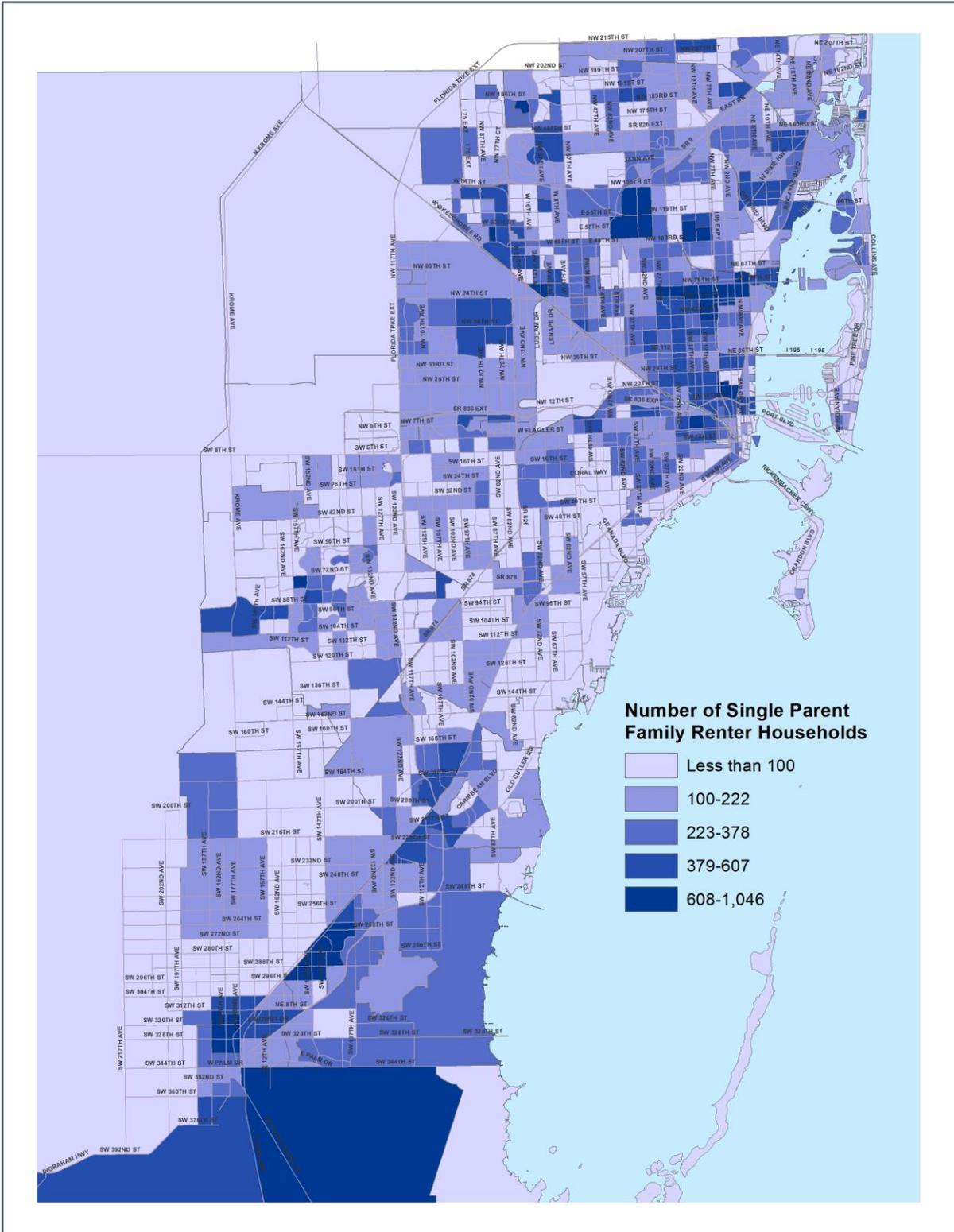
The data showed significant differences in the family types of owner and renter households. In 2021, 75 percent of owner households were family households

households, married couple families grew at nearly twice the rate of single-parent households, 16.1 percent versus 8.6 percent. Map 2, below, shows the geographic distribution of single-parent households.

Far more renter households compared to home-owner households were *nonfamily* households – 38.1 percent compared to 24.9 percent, respectively. The growth was much faster for non-family renters, up 9.6 percent from 2016 to 2021 compared to an increase of 4.3 percent for owners. In both cases, roughly 80 percent were occupants living alone. Elderly non-family households represented a much larger share of renter versus owner households in both 2016 and 2021, 59 percent compared to 37 percent.

*Fair Housing Implications: Lower-income individuals and aging-senior householders with detrimental health issues places these groups at a disadvantage. Rising housing costs have exacerbated the economic struggle for these vulnerable households. This indicates a need to address the availability for types of affordable housing units or financial assistance with an appropriate number of rooms for these individuals. The increasing rate of aging adults would mean higher demand for one-bedroom units or efficiencies, and the growing number of family households would lead to a higher demand for housing units with more bedrooms.*

Map 2: Miami-Dade County Number of Single-Parent Family Renter Households by Census Tract, 2021



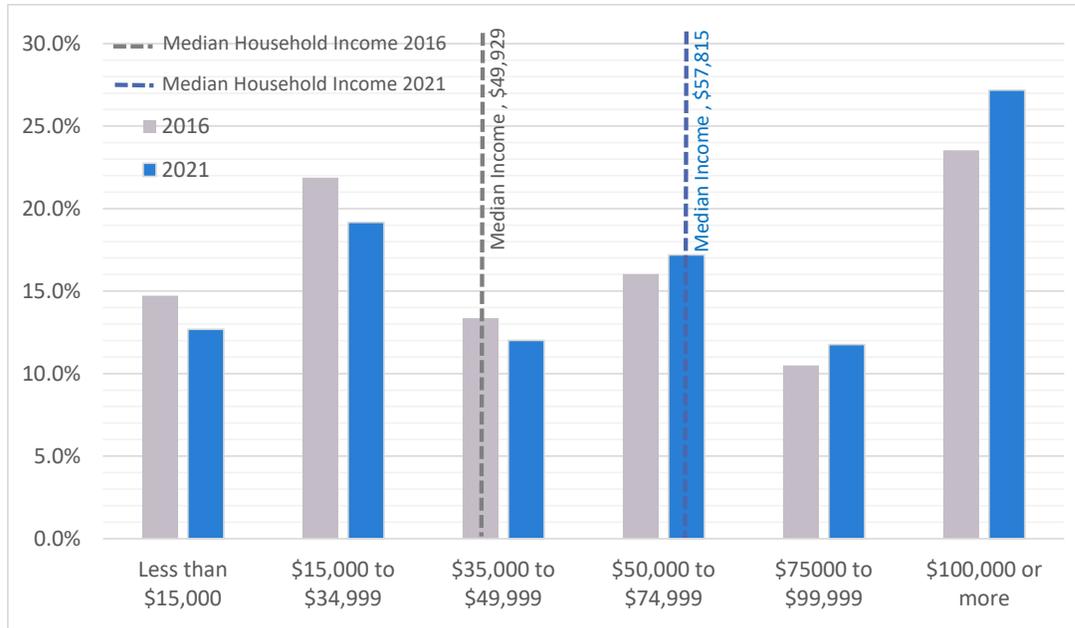
Data source: U.S. Census, American Community Survey, 2017-2021, 5-year Estimates

## D. Income

The financial stability and prosperity of Miami-Dade residents is an important factor that affects their ability to provide housing for their families. Miami-Dade County has had continuous and vigorous economic growth, but there are still great pockets of poverty and an increase in income disparity.

### Income Characteristics

**Figure 3: Miami-Dade County Households Income, Inflation-Adjusted, 2021\$**



Data source: U.S. Census, American Community Survey, 2011-2016 and 2017-2021, 5-year Estimates

According to the 2016 and 2021 ACS, the inflation-adjusted median household income, increased 15.8 percent from \$49,929 in 2016, to \$57,815 in 2021. The number of households with annual incomes less than \$15,000 decreased 5.4 percent as their share of all households fell from 14.7 percent of all households to 12.7 percent. At the other extreme, however, the number of households earning more than \$100,000 increased 26.7 percent from 2016 to 2021, increasing their share of all households from 23.5 percent to 27.2 percent.

The U.S. Department of Housing and Urban Development (HUD) publishes the area median income (AMI) annually. In 2021, the AMI for Miami-Dade County was \$61,000, representing a 26.8 percent increase from the AMI of \$48,100 in 2016. Based on this area median, HUD categorizes households by income ranges. Low-income is defined as those households earning less than 80 percent of the AMI. These households are further categorized as followed:

- Extremely Low-Income (ELI): At or below 30 percent AMI
- Very Low-Income (VLI): Less than 50 percent AMI
- Low-Income (LI): Between 50 percent and 80 percent AMI

Using 2021 ACS data and the HUD income limit summary for 2021, the number of households in Miami-Dade County were estimated for the following categories:

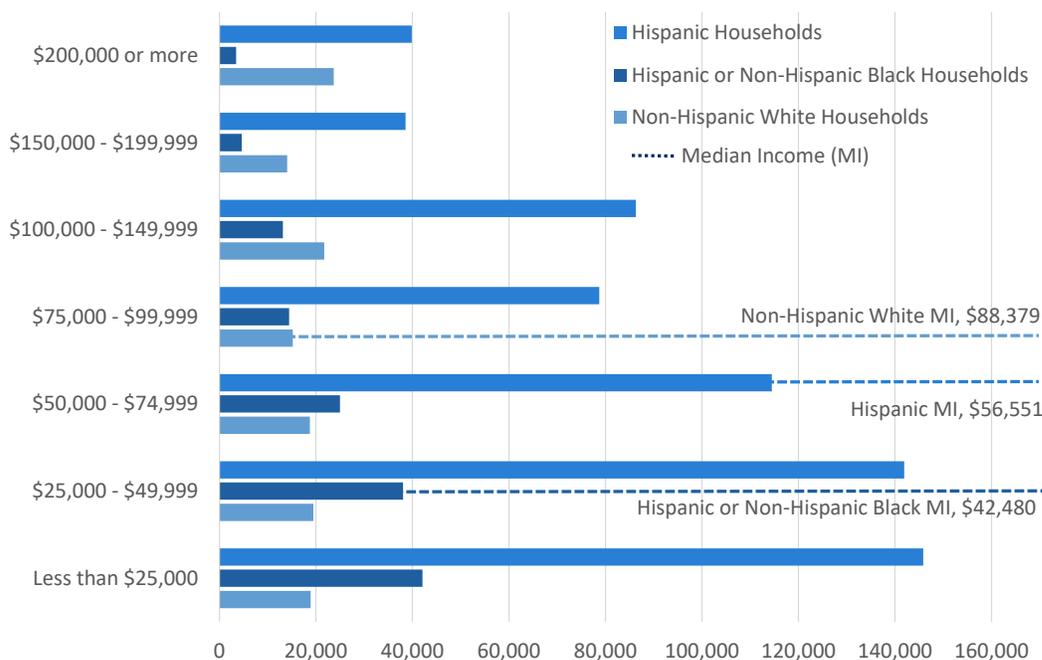
**Table 4: Miami-Dade County Households Area Median Income Limit, 2021**

	Area Median Income Limits	Households	% of Households
Very Low Income <50% AMI	\$30,500	259,890	27.8%
Low Income 50% to <80% AMI	\$48,800	141,851	15.1%
Moderate Income 80% to <120%	\$73,200	158,449	16.9%
Workforce Income 120% to <150%	\$91,500	84,270	9.0%
High Income 150% or More	\$91,500	291,891	31.2%

Data source: U.S. Census, American Community Survey, 2017-2021, 5-year Estimates, and HUD data 2021

A large percent of the county’s 936,351 households, 42.9 percent, earned LI or VLI. A total of 259,890 households (27.8 percent) earned VLI, and an additional 141,851 households (15.1 percent) earned LI. There were 158,449 moderate income households (16.9 percent), with 84,270 households (9 percent) earning workforce income, and 291,891 households (31.2 percent) earning high income.

**Figure 4: Miami-Dade County Households Income by Race and Ethnicity, 2021**



Data source: U.S. Census, American Community Survey, 2017-2021, 5-year Estimates

Figure 4, above, illustrates the income distribution of county households by race and ethnicity. The data that follows is defined differently than what has been presented above. The categories that follow, the only categories available for income, poverty employment, is for Hispanic of any race, non-Hispanic White, and Black which can be either Hispanic or non-Hispanic. In the county in

2021, 131,788 (14.1 percent) households were non-Hispanic White, 140,794 (15 percent) of households were Black, and 645,711 (69 percent) households were Hispanic. Non-Hispanic White households had the highest median income at \$88,379. Hispanic households had a median income of \$56,551, and Black households had the lowest median income at \$42,480. The remaining two percent of households were other races, not shown in the chart above.

Figure 4 shows the high concentration of Black households in the income categories below \$50,000 with a total of 80,122 Black households, 56.9 percent of their total, earning less than this amount. For Hispanic households, 287,779 earned less than \$50,000, representing 44.6 percent of their total. In comparison, 38,395 non-Hispanic White households, just 29.1 percent of their total, earned less than \$50,000. At the other end of the spectrum, 59,465 non-Hispanic White households (45.1 percent) earned more than \$100,000. The numbers and percentages earning more than \$100,000 for Black and Hispanic households were 21,255 (15.1 percent) and 164,733 (25.5 percent), respectively.

Poverty

According to the 2016 and 2021 ACS data presented in Table 5, the total number of persons living below the poverty level decreased to 416,413 people in 2021 from 522,143 people in 2016. The overall poverty rate dropped 4.2 percent from 19.9 percent to 15.7 percent. The largest drop in the poverty rate was in the Hispanic and non-Hispanic Black population, by 5.8 percent. However, the rate remains nearly 1.5 times higher than the overall rate. The rate for all Hispanics fell 4.5 percent, from 19.6 percent to 15.1 percent, as over 67,800 residents left the ranks of poverty. The rate for Non-Hispanic White fell 1.4 percent to 9.9 percent, the lowest for any group. While the poverty rate fell for the Hispanic and non-Hispanic Other race, from 18.1 percent to 14.8 percent, the actual number in poverty grew by nearly 80,000 residents. This results from the population for this entire group growing by 361 percent between 2016 and 2021. Census respondents reporting two-or-more races accounted for 80 percent of this growth.

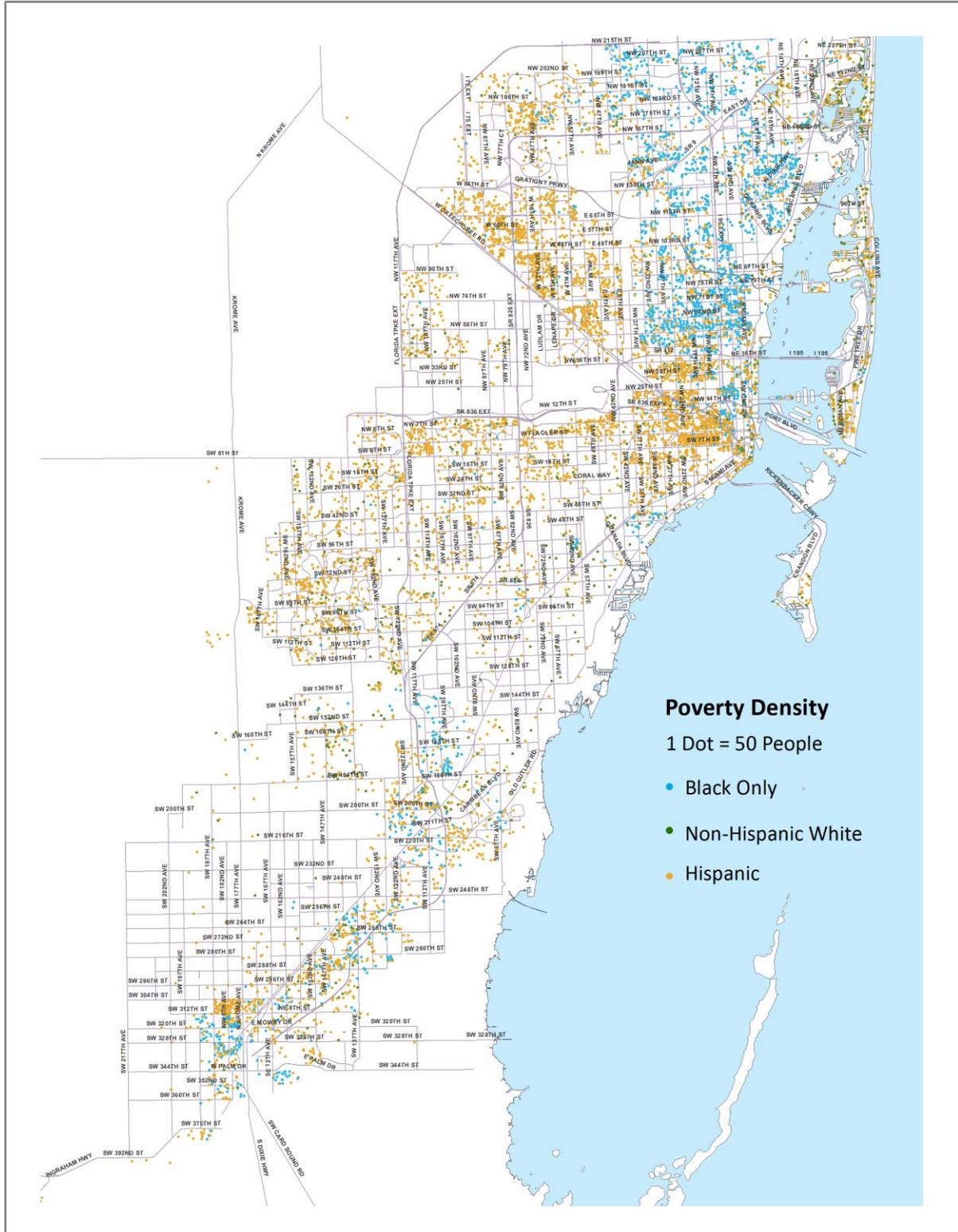
**Table 5: Miami-Dade County Below Poverty Level by Race and Ethnicity**

	Population Below Poverty Level				
	2021		2016		Change
Hispanic	276,698	15.1%	344,528	19.6%	-4.5%
Non-Hispanic White	34,449	9.9%	42,223	11.3%	-1.4%
Black (Hispanic or Non-Hispanic)	99,567	23.3%	138,157	29.1%	-5.8%
Other - Including Multiple (Hispanic or Non-Hispanic)	107,535	14.8%	27,815	18.1%	-3.3%
<b>Total*</b>	<b>416,413</b>	<b>15.7%</b>	<b>522,143</b>	<b>19.9%</b>	<b>-4.2%</b>

\* The total will not match the categories since Hispanic can be of any race and Black, and Other include Hispanic and non-Hispanic.

Data source: U.S. Census, American Community Survey, 2011-2016 and 2017-2021, 5-year Estimates

Map 3:: Miami-Dade County Poverty Density by Racial and Ethnic Groups, 2021



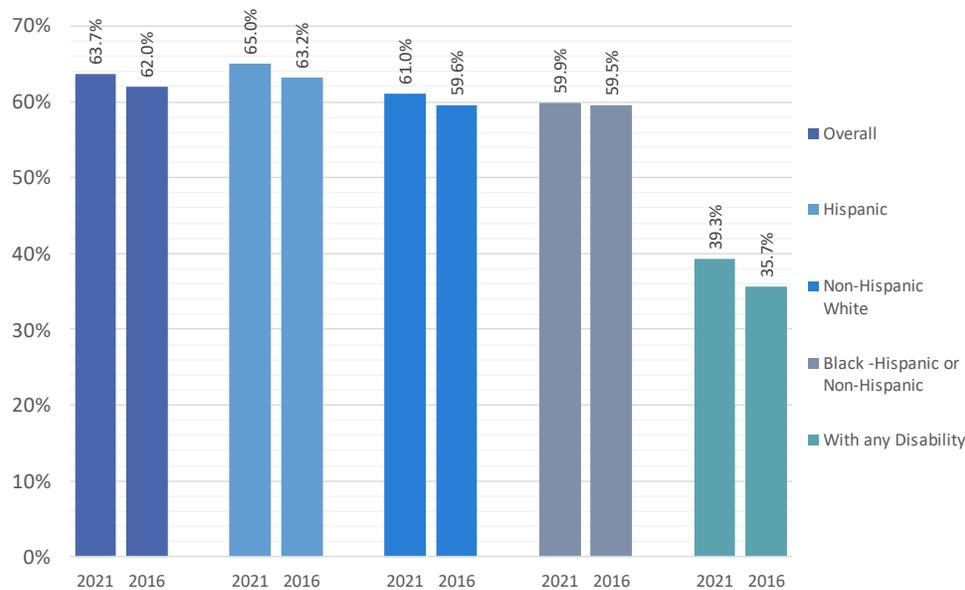
Data source: U.S. Census, American Community Survey, 2017-2021, 5-year Estimates

## E. Employment

The Miami-Dade County labor force participation rate increased from 62 percent in 2016 to 63.7 percent in 2021 as shown below in Figure 5. This number represents the share of the working-age population (16-years of age and over) that is actively participating in the workforce. The county working age population of 16 years and over increased 1.2 percent from 2016 to 2,204,401 people in 2021. The prime working age population between 20 years and 64 years decreased 0.3 percent to 1,641,472 people in 2021.

The labor-force participation rate increased for every group presented here. The largest increase was for persons with disabilities, up 3.6 percent. These can be persons of any race or ethnicity. The Hispanic population saw the next largest increase in the participation rate, up 1.8 percent, closely followed by the non-Hispanic White rate, increasing 1.4 percent. The participation rate for Blacks increased only by 0.4 percent between 2016 and 2021.

**Figure 5: Miami-Dade County Labor Force Participation by Race and Ethnicity, 2016 to 2021**



Data source: U.S. Census, American Community Survey, 2017 -2021, 5-year Estimates

*Fair Housing Implications: Poverty is a grave concern. Exclusion from the labor force has resulted in disproportionate loss of incomes for certain groups and people with disabilities. Policies that inhibit the participation in economic activity for these groups need to be addressed, as well as the provision of housing financing supports, and amendments to the zoning code to incentivize developers to build more housing in locations with convenient access to employment centers, and affordable and accessible for individuals with disabilities.*

## F. Transportation and Commuting

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 37 individual municipalities with an urbanized population of approximately 2.7 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 880 ADA compliant buses and nearly 100 routes travelling over 35 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.

All Metrobuses are wheelchair accessible, in compliance with the Americans with Disabilities Act of 1990, and all county buses except for private run routes are equipped with bicycle racks. Some privatized routes trucks are receiving bike racks but very limited. 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 24.4-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](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 2016 and 2021 ACS, there were 1,004,835 housing units in Miami-Dade County in 2016, and by 2021, the number had grown 6.0 percent to an estimated 1,064,991, reflecting the same growth rate in population. Meanwhile, total vacant units declined 22,571, from 151,211 to 128,640, representing a 14.9 percent reduction. As a result, the vacancy rate dropped from 15.0 percent to 12.1 percent over this period.

Of the 936,351 occupied units, owner-occupied units accounted for 45.6 percent (486,018) and renter-occupied accounted for 42.3 percent (450,333). The ratio of owner-occupied vs. renter-occupied decreased from 1.11 to 1.08. This reflects a decline in the rate of homeownership from 2016 to 2021.

*Table 6: Total Housing Units by Tenure and Vacancy, Miami-Dade County 2016 & 2021*

	Level		Growth	Share of Total Housing Units	
	2021 ACS	2016 ACS	2016-2021	2021 ACS	2016 ACS
<b>Total housing units</b>	1,064,991	1,004,835	6.0%	100.0%	100.0%
<b>Occupied housing units</b>	936,351	853,624	9.7%	87.9%	85.0%
<b>Owner-occupied</b>	486,018	449,174	8.2%	45.6%	44.7%
<b>Renter-occupied</b>	450,333	404,450	11.3%	42.3%	40.3%
<b>Vacant housing units</b>	128,640	151,211	-14.9%	12.1%	15.0%

Data source: U.S. Census Bureau, 2011-2016 and 2017-2021 American Community Survey 5-Year Estimates

#### B. Housing Affordability

According to HUD definitions, a “cost-burdened” household is one paying more than 30 percent of its income for rent or ownership costs. Homes are unaffordable if households are cost burdened. Severe cost-burden is defined as a household paying more than 50 percent of income for rent or ownership costs. The HUD 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data indicates that 405,115 of Miami-Dade households were cost burdened (Table 7). The percentage of cost burdened households in the county was 46 percent in 2019. In comparison, the statewide percentage was 33 percent.

Table 7, below, shows cost-burden by tenure. Of the 405,120 cost-burdened households 191,955 (22 percent) paid 30 to 50 percent of their income, and 213,165 (24 percent) paid more than half of their income on housing, classifying them as severely-cost burdened. Of all homeowners, (451,930), 34 percent (152,225) spent more than 30 percent of their income on housing and 16 percent spent more than 50 percent. Of all renters (431,440), 58 percent (252,895) spent more than 30 percent of their income on housing and 32 percent spent more than half. A greater percentage of renters (25 percent more), as a group, wrestle with housing cost burden

than homeowners, as a group.

**Table 7 : Households by Homeowner/Renter Status and Cost Burden, Miami-Dade County, 2019  
(Numerical and Percentage of Total Households)**

	0-30%	30-50%	More than 50%	Cost Burden not available	Total	Cost-Burdened
<b>Owner</b>	292,800	78,475	73,750	6,905	<b>451,930</b>	<b>152,225</b>
	65%	17%	16%	2%	<b>51%</b>	<b>34%</b>
<b>Renter</b>	163,950	113,480	139,415	14,595	<b>431,440</b>	<b>252,895</b>
	38%	26%	32%	3%	<b>49%</b>	<b>59%</b>
<b>Total</b>	456,750	191,955	213,165	21,500	<b>883,370</b>	<b>405,120</b>
	52%	22%	24%	2%	<b>100%</b>	<b>46%</b>

Data source: HUD’s Office of Policy Development and Research (PD&R), 2015-2019 CHAS (Comprehensive Housing Affordability Strategy) data

The annual HUD area median family income (HAMFI), also known as area median income (AMI), is \$68,300 for Miami-Dade County. As illustrated in Table 8 below, 75 percent (152,620) of all 203,770 ELI households, 77 percent (112,910) of all 147,120 VLI households, and 52 percent (88,240) of all 168,335 LI households are cost burdened. Conversely, only 14 percent (51,345) of all 364,145 households with incomes greater than 80 percent of AMI are cost burdened. This data shows that as AMI decreases, a greater percentage of households in each income category are cost burdened. What is most alarming are the extremely high rates of cost burden, and, in particular, severe cost burden for ELI, VLI, and LI households.

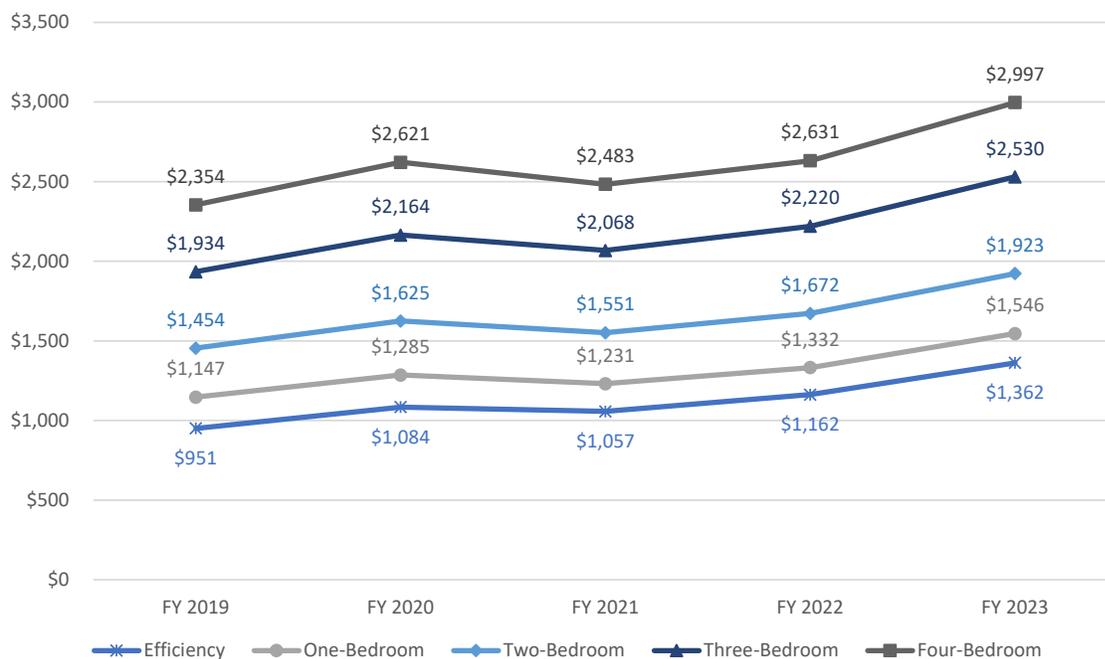
**Table 8: Amount of Income Paid for Housing by Household Income as a Percentage of AMI**

Household Income as a % of AMI	Household by the Amount of Income Paid for Housing				Cost-Burdened	% of Cost-Burdened Household
	0-30%	30-50%	50% or more	Grand Total		
<b>&lt;=30% AMI</b>	51,150	25,045	127,575	203,770	<b>152,620</b>	<b>75%</b>
<b>30.01-50% AMI</b>	34,210	54,350	58,560	147,120	<b>112,910</b>	<b>77%</b>
<b>50.01-80% AMI</b>	80,095	68,075	20,165	168,335	<b>88,240</b>	<b>52%</b>
<b>80.01-100% AMI</b>	60,230	21,210	3,300	84,740	<b>24,510</b>	<b>29%</b>
<b>&gt;100% AMI</b>	252,570	23,275	3,560	279,405	<b>26,835</b>	<b>10%</b>
<b>Grand Total</b>	<b>478,255</b>	<b>191,955</b>	<b>213,160</b>	<b>883,370</b>	<b>405,115</b>	<b>46%</b>

Data source: HUD’s Office of Policy Development and Research (PD&R), 2015-2019 CHAS (Comprehensive Housing Affordability Strategy) data

As shown in Figure 6 below, Miami-Dade fair market rent for an efficiency unit is \$1,362 in FY2023, and that of a one bedroom is \$1,546. However, VLI households with incomes of \$34,150 per year or less cannot afford rent greater than \$854 (30% of their monthly income). The Fair Market Rent of \$1,362 per month for an efficiency unit is beyond the reach of all VLI and ELI households in Miami-Dade County, let alone a one or two bedroom. Households with annual income at \$54,640 (80% of AMI) per year can only afford an efficiency apartment at the fair market rent. These households also struggle with meeting other expenses (food, utilities, health care etc.) in addition to staying current with their rent and are at risk of becoming homeless.

**Figure 6 Miami-Dade Fair Market Rents by Type and by Year (not-inflation-adjusted)**



Source: HUD’s Office of Policy Development and Research (PD&R), Fair Market Rents FY 2019-2023

### C. Housing Needs of Disabled Persons

The 2021 ACS indicated that there were 2,640,092 people in Miami-Dade County, of which 284,792 or 10.8 percent were persons with disabilities. The 2019 CHAS data estimated that of all 883,370 households, 21.1 percent (186,245) had a household member with one or more limitations (disabilities).

Persons with disabilities are particularly impacted by “worst case housing needs.” HUD’s “Worst Case Housing Needs, 2021 Report to Congress”<sup>1</sup> defines worst case housing needs as

<sup>1</sup> <https://www.huduser.gov/portal/publications/Worst-Case-Housing-Needs-2021.html>

“renters with very low incomes (VLI) – 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 2019, about 13 percent of renters with worst case needs were nonelderly persons with disabilities. Persons with disabilities are more subject to worst case housing needs because, “Disabilities can reduce employment options and create additional difficulties in finding suitable housing at reasonable cost; features such as elevators that are luxury amenities for some households may be necessities for people with disabilities. Additionally, Supplemental Security Income (SSI) benefits are inadequate to cover housing costs in many markets.”

The report also indicated that the national prevalence of worst-case-needs averages 36.1 percent among very low-income (VLI), nonelderly people with disabilities in 2019, which is moderately less than the 42.2-percent prevalence among VLI renter households overall.

According to the table below, of the 186,245 households with disabled household members in Miami-Dade County, 52.6 percent (97,955) had very low incomes. Among owner households, 39.2 percent (41,800) of them were very low incomes. Among renter households, 70.4 percent (56,155) of them were very low incomes. This is 28 percent higher than the national rate for renter households.

**Table 9: Household Income as Percentage of AMI by Tenure for Households with Member with Disabilities**

Household member with one or more limitations (Disabilities)	Share of		Share of		Share of	
	Owner Occupied	Total Owner Occupied	Renter Occupied	Total Renter Occupied	Total	Total
<=30% AMI	22,705	21.3%	40,470	50.7%	63,175	33.9%
30.01-50% AMI	19,095	17.9%	15,685	19.7%	34,780	18.7%
50.01-80% AMI	20,855	19.6%	12,565	15.7%	33,420	17.9%
80.01-100% AMI	43,805	41.1%	11,065	13.9%	54,870	29.5%
<b>Total</b>	<b>106,460</b>	<b>100.0%</b>	<b>79,785</b>	<b>100.0%</b>	<b>186,245</b>	<b>100.0%</b>

Data source: HUD’s Office of Policy Development and Research (PD&R), 2019 CHAS (Comprehensive Housing Affordability Strategy) data

The 2020-2024 Consolidated Plan and 2020 Action Plan for Miami-Dade County points out that:

[A]lthough Miami-Dade is considered one of the least affordable counties, persons with disabilities face an even harder struggle to afford housing. The current SSI disability income level is \$771 and the HUD Fair Market Rent Level for an efficiency is \$951 and one bedroom is \$1,147<sup>2</sup>. The Persons with disabilities who are not yet homeless do not qualify for U.S. HUD Continuum-of-Care funded permanent supportive housing assistance. Mainstream Voucher programs that are not limited to persons with disabilities have long

<sup>2</sup> The 2023 SSI disability income payment is \$914 and the 2023 HUD Fair Market Rent Level for an efficiency is \$1,362 and one bedroom is \$1,546.

waiting lists. The State funded housing programs usually do not target persons at such low-income levels, so this group is faced with little to no housing assistance options. The State and county jails are known to be the greatest housing provider for persons disabled due to a mental illness. Supportive services needs can include case management to assist in navigating community resources, and access to health care, including behavioral health care.<sup>3</sup>

#### **D. Homelessness<sup>4</sup>**

According to its website, The Miami-Dade Homeless Trust was created by Miami-Dade County Ordinance 94-66, and it was formed to: 1) to administer proceeds of a unique one-percent food and beverage tax dedicated to homeless and domestic violence services (85 percent of the funds toward homeless and 15 percent 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 results of the semi-annual “Point-in-Time” (PIT) homeless census, led by the Miami-Dade County Homeless Trust, conducted on January 27, 2022, identified a total of 3,440 sheltered and unsheltered homeless persons in the county compared with 3,224 counted in 2021 at the same time. The 2021 count was the lowest unsheltered counts since 2014 and the lowest homeless totals (unsheltered and sheltered) since the Continuum of Care (CoC) began counting in 1996. In 2022, the unsheltered count increased by 9 percent and the sheltered count is up by 6 percent. The reason for this is that shelters have started to increase occupancy and loosen social distancing as the testing and vaccine protocols were relaxed. 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 inclement weather in other parts of the U.S.

As part of the PIT Count, the CoC also looks at homeless subpopulations, including youth, veterans, households with and without children, adults with serious mental illness, substance-use disorders, HIV, survivors of domestic violence, and chronically homeless households. Adults with a serious mental illness accounted for half of the homeless population. An analysis over the past two years (2021 and 2022) demonstrates the following as it pertains to these subpopulations:

---

<sup>3</sup> <https://www.miamidade.gov/housing/library/ads/exhibit-1-2024-consolidated-plan-and-2020-action-plan.pdf>

<sup>4</sup> <https://www.homelesstrust.org/resources-homeless/library/providers/governance-and-plan/2021-mdc-homeless-plan.pdf>

<https://www.homelesstrust.org/resources-homeless/library/2022/2022-miami-dade-gaps-and-needs-report.pdf>

<https://www.homelesstrust.org/resources-homeless/library/system-performance-measurement-data-2021.pdf>

There was a 4% decrease in adults with a serious mental illness (n=50%)  
There was a 15% increase in adults with a substance abuse disorder (n=22%)  
There was a 2% increase in adults with HIV/AIDS (n=5%)  
There was a 4% increase in DV survivors (n=19%)  
There was an 1% increase in number of total veterans (n=6%)  
There was a 2% increase in total number of unaccompanied youth (n=6%)

In 2022-2023, the CoC partnered with Racial Equity Partners (REP) to conduct a series of trainings for providers and committee members and helped to develop and implement a racial equity action plan and further numerous strategies already underway. The last training will be held on February 7, 2023. Historic review of the data suggests that while less than 18% of Miami-Dade County's general population and 26% of all persons living in poverty in Miami-Dade are Black, they make up 57% of all persons experiencing homelessness, and 66% of all families experiencing homelessness in Miami-Dade County.

The Homeless Trust organizes and directs the Miami-Dade County Homeless Plan. In 2004, a "Ten-Year Plan to End Homelessness Additional Strategies to the Miami-Dade County Community Homeless Plan" was developed, consistent with U.S. HUD mandates at the time for communities throughout the country, and consistent with U.S. HUD's development of their own Ten-Year Plan. At that time, strategies surrounding Homeless Prevention and Rapid Re-Housing were being implemented, as well as the first of the "Housing First" models. Enhancements to efforts to assist chronically homeless households were also under development.

The latest update of the Priority Plan (2023) identified additional Strategies, resulting in nine (9) categories for focus and action, as follows:

- Emergency Housing/Transitional Housing/Permanent Housing/Rapid Re-Housing,
- Coordinated Outreach, Assessment & Placement,
- Homeless Prevention and Diversion,
- Supportive Services,
- Effective Use of Data,
- Income through Employment/Benefits,
- Reduce Length of Homelessness,
- System Changes to Prevent Homelessness,
- Homeless Plan.

Five of the areas for focus were already components of the Miami-Dade County Community Homeless Plan.

In 2022, the Miami-Dade County Homeless Trust was awarded more than \$41,000,000 by the U.S. Department of Housing and Urban Development (U.S. HUD) as part of its FY 2021 Continuum of Care (CoC) Competition. Included in the award is funding for three (3) new projects totaling more than \$3.8 million which will provide housing for an estimated 135 households, or 284 persons, including new units for survivors of domestic violence. The CoC grants provide funding to help individuals and families experiencing homelessness move into permanent housing

with access to supportive services, with the overarching goal of long-term stability. In 2022, with the help of U.S. HUD funding, the Homeless Trust placed 7,635 formerly homeless adults and children into permanent housing.<sup>5</sup>

*Fair Housing Implication(s): Extremely low income (ELI) and very low income (VLI) households are easily priced out by high rents and housing costs in Miami-Dade County. The lack of affordable housing, including Extremely Low Income (ELI) Housing, as well as Permanent Supportive Housing for persons with Special Needs must be addressed. In addition, since adults with mental health issues accounted for 50% of the homeless population, mental health care services are also needed to address chronic homeless issue.*

---

<sup>5</sup> <https://www.homelesstrust.org/resources-homeless/releases/2022-03-15-people-experiencing-homelessness.asp>

## E. Public Housing & Assisted Housing

Miami-Dade Public Housing and Community Development (PHCD) administers several programs 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 6,744 public housing units and 2159 Rental Assistance Demonstration Program (RAD) units and 100 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. PHCD now has less than 2,000 applicants remaining on the Public Housing Waitlist and is working towards fully exhausting the Public Housing waitlist.

### Section 8

#### Housing Choice Vouchers

The Section 8 program is comprised of approximately 19,000 Housing Choice Vouchers (including 271 Veterans Affairs Supportive Housing) and 1,551 Moderate Rehabilitation project-based units. Additionally, PHCD administers 204 units under the Single Room Occupancy (SRO) Section 8 Moderate Rehabilitation 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.

Section 8 program 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 to 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, the HUD-funded project-based rental assistance program provides rental assistance for 1,551 units for very low to 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.

- 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, Moderate Rehabilitation Single Room Occupancy (SRO) Program, Veterans Assisted Supportive Housing Program, and Assisted Living Facilities for the Elderly.

#### *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.

### Rental Assistance Demonstration Program

The Miami-Dade County Department of Public Housing and Community Development (PHCD) is embarking on a comprehensive redevelopment initiative to preserve our approximately 9,000 public housing units, which serve nearly 18,000 of the County's lowest-income residents. Miami-Dade County has an estimated need of approximately \$2 billion dollars to address deteriorating conditions to a housing stock which, on average, is over 40 years old.

Miami-Dade County will maintain ownership of the land. Private sector companies will have a 75-year lease and the properties will be co-managed by private sector property management firms and PHCD. Section 8 New Construction (S8NC) S8NC developments are privately managed.

### *Accessibility*

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.

### *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.

#### *Workforce Housing Program*

On October 6, 2015, the Miami-Dade County Board of Commissioners adopted Resolution No. 890-15 creating 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 with a moderate income, particularly those whose earnings range from 60 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. Workforce Housing projects qualify for an expedited site plan and zoning review process. PHCD and RER oversee the administration of this program.

#### *PHCD's Mixed Income Properties*

Miami-Dade County owns 1,388 units of affordable housing that are provided to households with incomes that do not exceed 140% of the area median income.

PHCD Community Development Division - Asset Management Property Portfolio					
Property Name	Address	Comm- ission District	Number Of Units	Management Company	Features
Affordable Properties					
Lakeside Towers	7555 SW 152 Avenue Miami 33193	11	384	Royal American Management 305-383-2042	Located in Kendall, the property has all the comforts of home. Beautiful one-, two-, and three-bedroom apartments with scenic views and close proximity to local shops, malls, schools and restaurants. Amenities:

					swimming pool, resident activities, 24-hour courtesy officer, 24-hour attended entrance, youth playground, gazebo & BBQ, community room w/computers. Floor Plans: 1 bed/1 bath (approx. 726 sf); 2 bed/2 bath (approx. 968–1266 sf); 3 bed/2 bath (approx. 1191–1280 sf).
Gateway Apartments	155 NW 14 Street, Florida City, FL 33034	9	57	Royal American Management 305-248-3500	Located in Florida City, this community consists of a two-story building on 1.38 acres and includes onsite management and laundry facilities. There are one-, two-, and four-bedroom units.
Ingram Terrace Apartments	3130 NW 131 Street, Opa-Locka, FL 33054	1	40	Royal American Management 305-627-0776	Property provides modern living with all the qualities and comforts of home; consists of two-bedroom apartments. Close proximity to schools, public parks. Floor plans: 2 bed/1 bath (approx. 850 sf). Amenities include onsite laundry, emergency maintenance service.
Park Lake Apartments	8201 SW 152 Avenue Circle, Miami FL 33193	11	82	Royal American Management 305-386-2506	This property consists of 9 buildings, 82 garden style units, located on 6 acres in Kendall. Park Lake provides modern living with all the comforts of home and has beautiful one- and two-bedroom apartments, scenic views and close proximity to local shops, malls, schools and restaurants. Floor plans: 1

					bed/1 bath (approx. 576 sf); 2 bed/1 bath (approx. 864 sf); 2 bed/2 bath (approx. 854 sf). Amenities include central A/C, modern appliances, emergency maintenance service.
Leisure Villas	28701 SW 153 Avenue, Miami FL 33033	9	30	Royal American Management	This property consists of 2 buildings with 15 units each located on 2 acres in South Dade near US1. Leisure Villas provides modern living with all the comforts of home. Spacious 3 bedroom/2 bath apartments, close proximity to local shops, schools, public parks and busway. Amenities include picnic area and BBQ grills, central A/C, modern appliances, washer & dryer in unit, microwave oven, dishwasher, central A/C, tile throughout unit. Floor plans: 3 bed/2 bath (approx. 1260 sf).
Gran Via Apartments	12700 SW 8 Street, Miami 33184	11	104	Magasi Management 305-692-0319	This affordable elderly property is a modern-high rise building with 104 units consisting of studios and one-bedroom apartments. The property has energy and environmental features that make it a great place to call home. Amenities include laundry facilities, storage areas, bicycle room, community room, covered parking, controlled access, 2 retail spaces (for rent), Floor plans: efficiency (approx. 395

					sf); / 1 Bath (approx. 680-717 sf)
Senator Villas Apartments	8915 SW 40 Street, Miami FL 33165	10	23	Magasi Management 305-692-0319	This affordable property was built in 2019; this two-story, 23-unit building has studios, one-bedroom and two-bedroom units with elevator complies with the Uniform Federal Accessibility Standards for accessible features that meets the needs of individuals with disabilities. There are two units for mobility impaired and one unity for vision and hearing impaired. Units have LED lights, porcelain stile, patio/balcony and have all-in-one washer/dryer. Only assistive dogs are permitted. Security cameras and parking for residents and guests.
<b>Section 8 New Construction</b>					
Coconut Grove	Scattered site: 3650-3676 Day Avenue; 3664-3692 Percival Avenue; 3671-3677 Oak Avenue, Miami FL 33133	7	24	Royal American Management 888-256-1489	Conveniently located in Coconut Gove, this community provides modern living with all the qualities and comforts of home. Property has three and four bedroom apartments and is in close proximity to local shops, schools, public parks and Metrorail station. Floor plans: 3 bed/2 bath (approx. 1422 sf); 2 bed /2 bath (approx. 1664 sf). Amenities include central A/C, modern appliances, and emergency maintenance service.

Gibson Plaza	3160 Mundy Street Miami, FL 33133	7	65	Royal American Management 305-446-2734	Conveniently located in Coconut Grove, Gibson Plaza is an elderly community that provides modern living with all the qualities and comforts of home. The property has efficiency and one-bedroom apartments and is close to local shops, schools, public parks and Metrorail station. Floor Plans: efficiency (approx. 410 sf); 1 bed/1 bath (approx. 560 sf). Amenities include central A/C, modern appliances, and emergency maintenance service.
Goulds	Scattered site (W. Old Cutler Road and SW 112th Avenue) Miami, FL 33170	9	48	Royal American Management 305-256-1611	This community was constructed in 1980 and consists of two-, three- and four-bedroom homes. Close proximity to Southland Mall and numerous retail outlets and business on US1. Floor Plans: 2 bed/1 bath (approx. 900 sf); 3 bed/2 bath (approx. 1520 sf); 4 bed/2 bath (approx. 1640 sf). Amenities include central A/C, modern appliances, emergency maintenance service.
Little Havana I	1759 SW 5 Street, Miami, FL 33135	5	75	Royal American Management 888-338-0432	Conveniently located in Little Havana, this four-story elderly property was constructed in 1982. Close proximity to local shops, public parks. Floor plans: efficiency (approx. 403 sf); 1 bed/ 1 bath (approx. 600 sf). Amenities include modern appliances, emergency

					maintenance service, onsite laundry facility, and community room.
Miami Gardens Apartments	2170 NW 183 Street, Miami, FL 33056	1	45	Royal American Management 305-627-0776	Conveniently located near Hard Rock Stadium, this three-story townhouse style community was built in 1980. Close proximity to schools, public parks. Floor Plans: 2 bed/1 bath (approx. 925-1075 sf). Amenities include central A/C, modern appliances, emergency maintenance service, onsite laundry facility.
Milton Manor III	145 SW 7 Street, Homestead FL 33030	9	60	Royal American Management 305-248-5448	This development is a three-story building, consisting of 60 units, located on 1.79 acres. Conveniently located near US1, this small property provides modern living with all the qualities and comforts of home. Milton Manor has both efficiency and 1 bedroom apartments. Close proximity to local shops, schools, public parks and busway. Floor plans: efficiency (approx. 494 sf); 1 bed/1 bath (approx. 589 sf). Amenities: central A/C, modern appliances, onsite laundry facility.
Perrine Rainbow	10000 -10037 SW 173 Terrace, Miami, FL 33157	9	64	Royal American Management 305-256-1611	This community has two-, three- and four-bedroom homes and is close to local shops, schools, and public parks. Floor plans: 2 bed/1 bath (approx. 1251 sf); 3 bed /2bath (approx. 1371 sf); 4

					bed/2 bath (approx. 1514 sf). Amenities: modern appliances, emergency maintenance service.
Riverside Apartments	950 SW 1st Street, Miami, FL 33130	5	75	Royal American Management 305-549-3088	Conveniently located in Little Havana, Riverside Apartments offers efficiency and one-bedroom apartments. Close proximity to local shops, public parks, and downtown Miami. Floor plans: efficiency (approx. 410 sf); 1 bed/1 bath (approx. 560 sf). Amenities: modern appliances, emergency maintenance service, onsite laundry facility, community room.
Singer Plaza	1310 NW 16th Street, Miami, FL 33125	3	100	Royal American Management 305-548-3440	Conveniently located near the Health District, Singer Plaza provides one- and two-bedroom apartments for individuals with disabilities. It is also close to Metrorail, downtown Miami. Floor plans 1 bed/1 bath (approx. 600 sf); 2 bed/1 bath (approx. 813 sf). Amenities: modern appliances, emergency maintenance service, onsite laundry facility, community room.
Wynwood	Scattered site (535 NW 33 St, 300 NW 34 St, 401 NW 33 St, 137 NW 30 St, 22 NW 31 St, 518 NW 33 St, 3210 NW 5 Ave,	3	40	Royal American Management 305-548-3440	Conveniently located near Miami's Fashion district, Wynwood consists of two-, three- and four-bedroom apartment homes. Close proximity to local shops, public parks. Floor plans: 2 bed/1 bath (approx. 1085 sf); 3 bed/2

	501 NW 32 St) Miami FL 33127				bath (approx. 1235 sf); 4 bed/2 bath (approx. 1556 sf). Amenities: emergency maintenance service, onsite laundry facility, community room.
<b>Homeownership Program</b>					
Southern Anchor	15360 SW 123 Avenue, Miami FL 33177	9	72	Royal American Management 305-259-3407	This development is near Zoo Miami and covers nearly 39 acres and consists of 12 duplex-style buildings with 72 units, specifically three- and four-bedroom townhouses, close proximity to local shops, malls, schools and restaurants. Amenities include: playground, basketball court, tennis court, racquetball court, central A/C, modern appliances, and emergency maintenance service. Floor plans: 3 bed/2 bath (approx. 1250 sf); 4 bed/2 bath (approx. 1450 sf).

*Miami-Dade Housing Finance Authority*

- Affordable Rental Housing

A 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. In total, Miami-Dade Housing Finance Authority has funded 81 affordable rent properties located throughout Miami-Dade County. Each development financed by Miami-Dade County HFA is privately-owned and managed. Rental applications are available and processed at each development. The process requires each renter to submit standard qualification information such as proof of income and employment, rental history, and other credit and personal information.

*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; and generate payment of property taxes.

#### *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 Partnerships Program (HOME), State Housing Initiative Partnerships (SHIP), 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 FY2019-2020, \$1,420,000 of loan support for Affordable Housing Purchase Assistance was provided to 22 Miami-Dade County homeowners.

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.

##### *The 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 30 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.

#### *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.

- Real Estate Education and Community Housing, Inc
- Centro Campesino Farmworkers Center, Inc.
- NID-HCA Experts Resource Community Center, Inc.
- Cuban National Council, Inc
- Housing Foundation of America, 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
- 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
  - Deferral of County liens and citations for participating For-Profit developers
  - Refund of impact fees for homes sold to low-income buyers (80% or below area median income).
  - Building Permit Expedite Process.
  - Funding assistance in the form of second mortgages for qualified buyers (subject to availability).

Fair Housing Implication:

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

### *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 increases 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 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 several 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 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. Remediation of lead-based paint, asbestos and other environmental issues is required to ensure that residents have

safe and secure living conditions. 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.

### G. Planning & Zoning/Building Codes (Accessibility)

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 and 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 units. *It is recommended that the County consider evaluating the zoning language to ensure consistency.*
- Several of the zoning ordinances specify site plan review standards and processes. To encourage and promote the construction of workforce housing units and affordable housing projects, Miami-Dade County established an expedited plan review program to ensure the timely processing of permit applications and review of plans. *It is recommended*

*that the County continue to expedite affordable and workforce housing plan reviews.*

- 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 are 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 Act<sup>1</sup> 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. <sup>2</sup>

<sup>1</sup> Title VIII of the Civil Rights Act of 1968, 42 USC 3601.

<sup>2</sup> <http://www.hud.gov/fairhousing>.

### *Florida Fair Housing Act/Florida Commission on Human Relations*

The Florida Fair Housing Act<sup>3</sup> 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.

### *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.<sup>4</sup> 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.

---

<sup>4</sup> 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, 2019, through December 31, 2022, the Miami-Dade County Commission on Human Rights received a total of 243 housing complaints. Discrimination on the basis of source of income, race, and disability represents the greater portion of all complaints received.

Miami-Dade County Commission on Human Rights Housing Discrimination Complaints  
January 1, 2019 - December 31, 2022

Year	Federally Protected Classes								Additional Protected Classes Under Miami-Dade County Ordinance							Total
	Race	Color	National Origin	Religion	Gender	Familial Status	Disability	Retaliation	Age	Marital Status	Gender Expression	Gender Identity	Sexual Orientation	Domestic Violence	Source of Income	
2019	10	7	5	3	3	4	14	12	7	3	0	0	2	1	18	89
2020	14	9	9	1	0	2	8	4	2	1	2	1	4	0	8	65
2021	18	13	9	1	6	6	15	14	11	2	3	1	1	1	11	112
2022	27	17	10	2	7	6	15	17	11	2	0	1	5	2	49	171
Total	69	46	33	7	16	18	52	47	31	8	5	3	12	4	86	437

*Note: Some complaints alleged two or more protected classes in their complaints. Therefore, the number of protected classes does not equal the total in some instances.*

### 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 Private Enforcement to accomplish its mission and operates *Fair Housing and Special Housing Programs*.

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.

#### *Violence Against Women Act and Fair Housing*

The Violence Against Women Act (VAWA) is a 1994 federal law that protects individuals who are survivors of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, sexual orientation, or gender identity. It includes protection for survivors who are applying for or residing in covered housing programs. VAWA was reauthorized and strengthened in 2022 to support an individual’s, including survivor’s right to seek law enforcement or emergency assistance. VAWA housing protections prohibit covered housing programs from denying housing or evicting a victim. As a covered housing provider, Miami-Dade County continues to provide VAWA housing protections to residents. As a Community Development Block Grant (CDBG) recipient, Miami-Dade County has additional requirements to report non-compliant local laws and ordinances.

## B. Fair Housing Litigation

“Pursuant to its mission of ensuring equal access to housing for all, Florida Fair Housing Alliance (FFHA) began investigating the 800 Capri apartment community, located at 800 Capri Street, Coral Gables, Florida 33134, for discriminatory housing practices. On September 24, 2020, at approximately 10:49 a.m., a field tester called the 800 Capri was connected to an agent of the apartment complex. The field tester asked if rental property was available. The agent responded that rental property was available, namely, a one-bedroom apartment. The field tester then asked if the complex accepted Section 8 payment vouchers and Defendant responded that it did not. As confirmed by the call, the complex refuses to accept Section 8 payment vouchers, i.e., Section 8 Housing Choice Vouchers. Refusing to accept Section 8 Housing Choice Vouchers is unlawful discrimination based on source of income. FFHA filed a suit on January 15, 2021, claiming that the defendant, 800 Capri, violates Section 11A-12(1) of the Miami-Dade County Code of Ordinances, which prohibits discrimination based on source of income.

Source:

<https://www.prweb.com/releases/the-law-offices-of-jibrael-s-hindi-wins-victory-for-low-income-tenants/prweb18255900.htm>

“The United States Department of Justice (DoJ) has settled with multiple defendants accused of operating a scam across Florida that preyed on hundreds of Spanish-speaking homeowners. On June 10, 2022, the DoJ announced the settlement with Advocate Law Groups of Florida, Jon Lindeman Jr., Ephigenia Lindeman, Summit Development Solutions, and Haralampos “Bob” Kourouklis. Between them, the defendants had offices in the Florida cities of Miami Lakes, Fort Lauderdale, Naples, Palm Beach, Orlando, Tampa, Bonita Springs, and Jacksonville. The scam involved fraudulent offers to help people with mortgage loan modifications and foreclosures.

Three families stepped forward to complain, and the case was argued in court by lawyers for the DoJ Civil Rights Division and the U.S. Attorney’s Office for the Middle District of Florida. The defendants now face a consent judgment against them to pay \$4,595,000 to compensate their victims.”

Source: HOPE Forum, Summer 2022, 90<sup>th</sup> Edition, Page 4.

“On June 21, 2022, the United States Department of Justice (DoJ) announced a historic fair housing settlement. On the other side of the table sits Meta, the giant social media parent company of Facebook, Instagram, WhatsApp, and other platforms. According to a complaint brought by the DoJ, Facebook’s ad targeting and delivery system aids in discrimination by only showing housing ads to certain people based on illegal criteria such as race.

Because of this more recent settlement, Facebook’s advertising systems will be subject to court oversight for the first time. The DoJ has noted that, if changes are not adequately made to deal with the discrimination, the complaint will be brought to court. U.S. Attorney Damian Williams for the Southern District of New York noted, “Because of this ground-breaking lawsuit, Meta will — for the first time — change its ad delivery system to address algorithmic discrimination. But if Meta fails to demonstrate that it has sufficiently changed its delivery system to guard against algorithmic bias, this office will proceed with the litigation.”

Source: HOPE Forum, Summer 2022, 90<sup>th</sup> Edition, Page 4.

## LENDING DATA ANALYSIS

### A. Introduction

The following pages illustrate the Home Mortgage Disclosure Act (HMDA) data relating to lending practices in Miami-Dade County. The HMDA was enacted by congress in 1975 to identify where racial or ethnic discrimination may be perpetuated by lending institutions. These acts are identified by higher rejection and failure rates for loan applications.

### B. HMDA Data Analysis

Lending data for a 10-year period (2011, 2016, and 2021) for Miami-Dade County was obtained in order to identify patterns and disparities in home mortgage lending. 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

The US Consumer Finance Protection Bureau collects the data from financial institutions and 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.

*Figure 7 Yearly Loan Activity Comparison Chart*

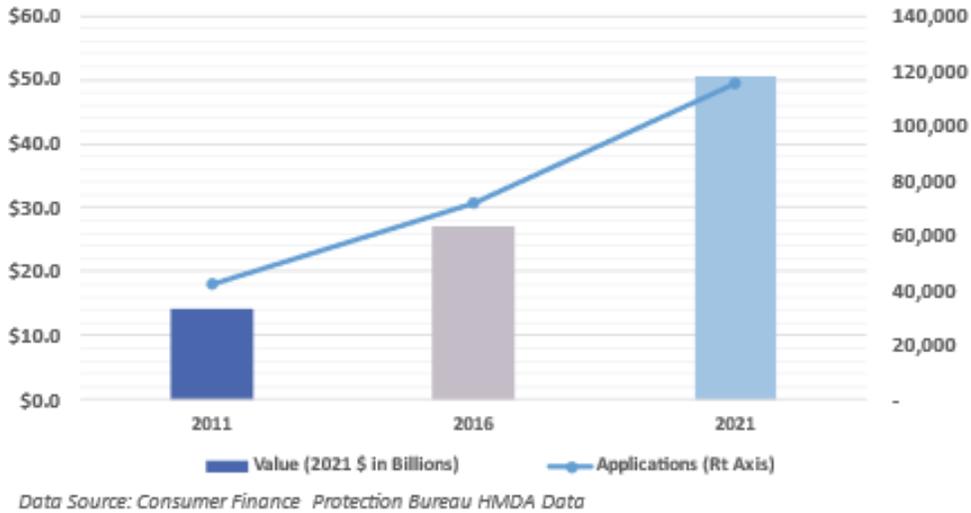
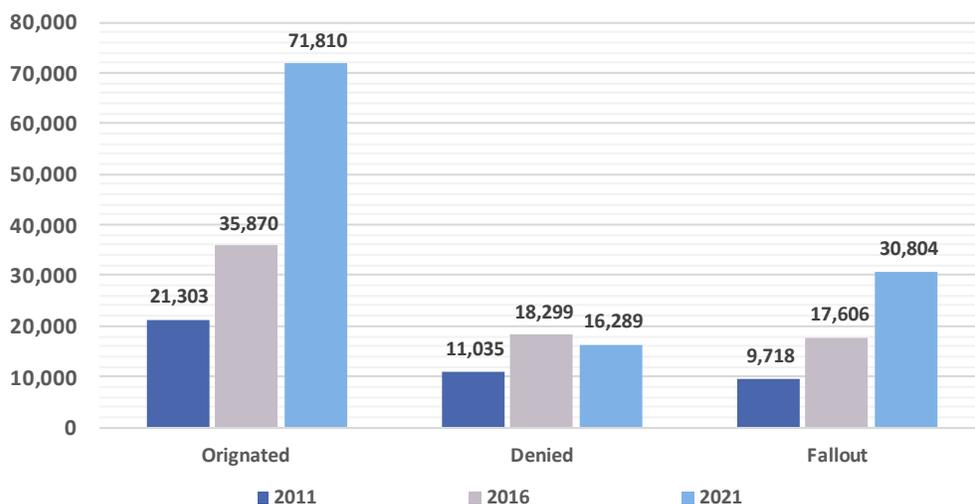


Figure 7 provides a view of the dollar value and number of Miami-Dade County home-loan applications annually for the three years spanning the last decade. This graph illustrates how both the number of applications and the value of the originated loans increased significantly between 2011 and 2021. Application volume increased from 42,056 in 2011 to 115,181 applications in 2021. Loan volume increased from a 2011 value of \$14.2 billion to \$50.5 billion in 2021.

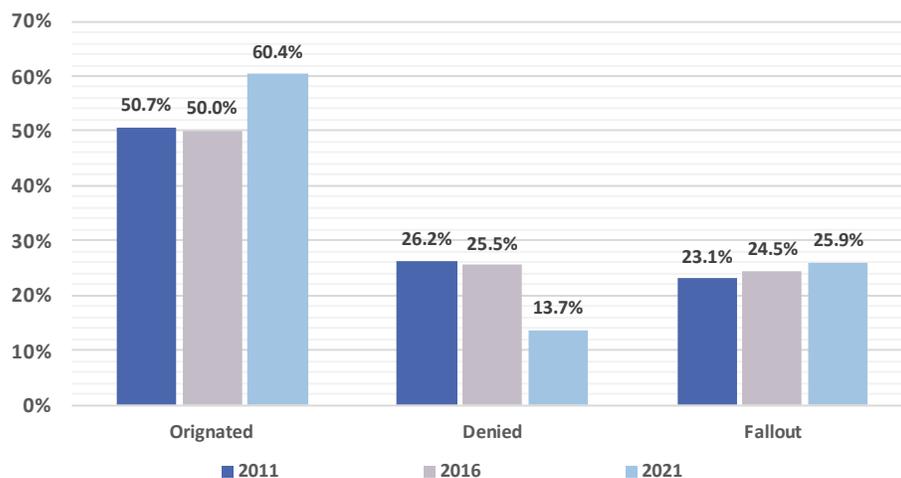
The Origination, Denial and Fallout Distribution graphs (Figures 8 and 9) show how lenders and borrowers in Miami-Dade County have responded to the application process with originations, denials, and fallout for the three time periods. Countywide, the number of loans originated increased more than three-fold between 2011 and 2021 and two-fold from 2016 to 71,810 loans in 2021, representing 60.4 percent of all applications that year. The number and share of applications denied declined between 2016 and 2021 to 13.7 percent of applications. The number of applications that fell out before reaching a decision increased throughout the ten-year period from 9,718 in 2011 to 17,606 in 2016 and 30,804 in 2021.

**Figure 8 Number of Applications by Action**



Data Source: Consumer Finance Protection Bureau HMDA Data

**Figure 9 Percentage of Applications by Action**



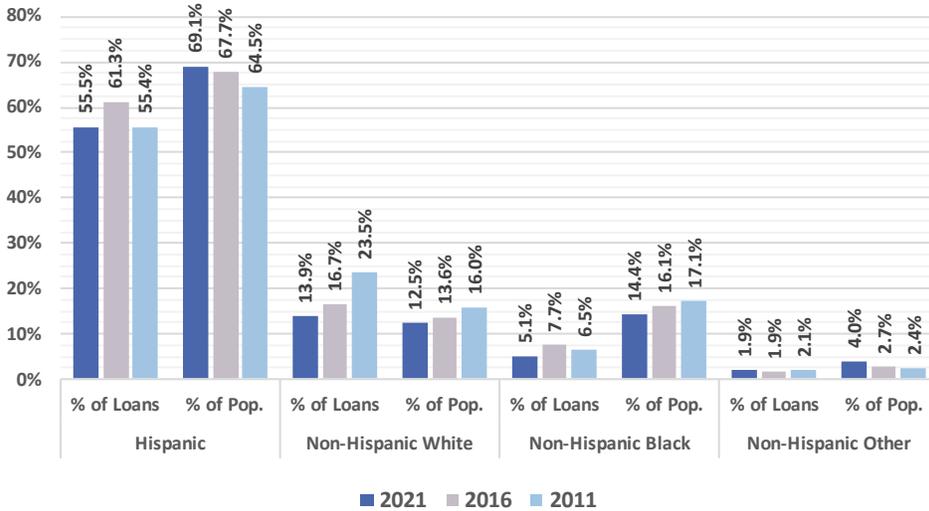
Data Source: Consumer Finance Protection Bureau HMDA Data

The origination, denial, and fallout trends reflect how loan origination mirror the rise of housing prices, employment and other economic indicators as the economy recovered from the Great Recession. The graph also shows how denials moved in an opposite direction to origination, falling as 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 can result from a highly competitive market, but also is suspected to sometimes indicate the reluctance of a borrower to continue working with a lender because of

ill treatment.

Over the ten years from 2011 to 2021, Hispanic applicants consistently submitted the highest numbers of applications by more than two-to-one, followed by Non-Hispanic White applicants, and then Non-Hispanic Black applicants. In general, this pattern mirrors the distribution of the population (See Figure 10).

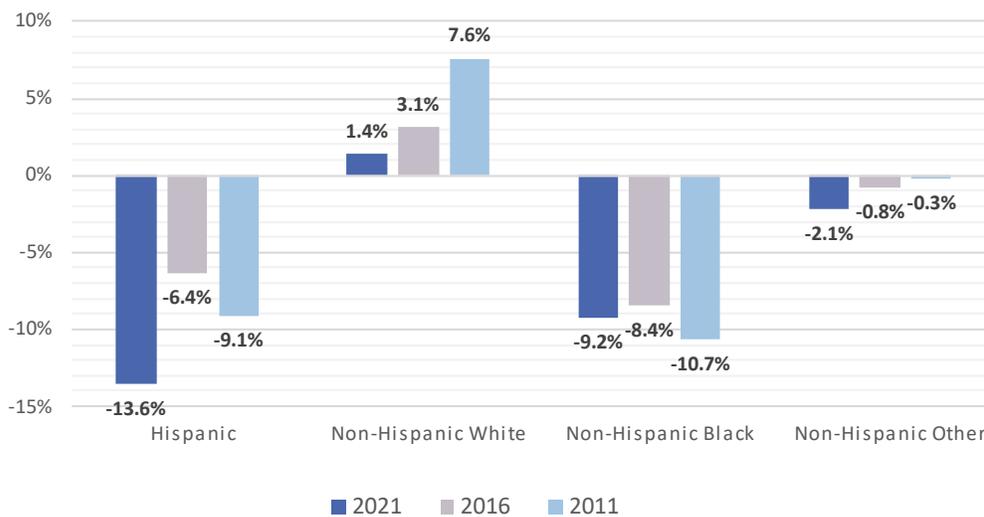
**Figure 10: Share by Ethnicity and Race of Applicants and/or Co-applicants and Population**



Data Source: Consumer Finance Protection Bureau HMDA Data; ACS 1 -year estimates.

Once adjusted for shares of population, Figure 11, Hispanic applicants submitted a far smaller share of application compared to their corresponding share of the population. In 2021, 55.5 percent of applications were for loans with a Hispanic applicant or co-applicant compared

**Figure 11 Share of Applications compared to Population by Ethnicity and Race**

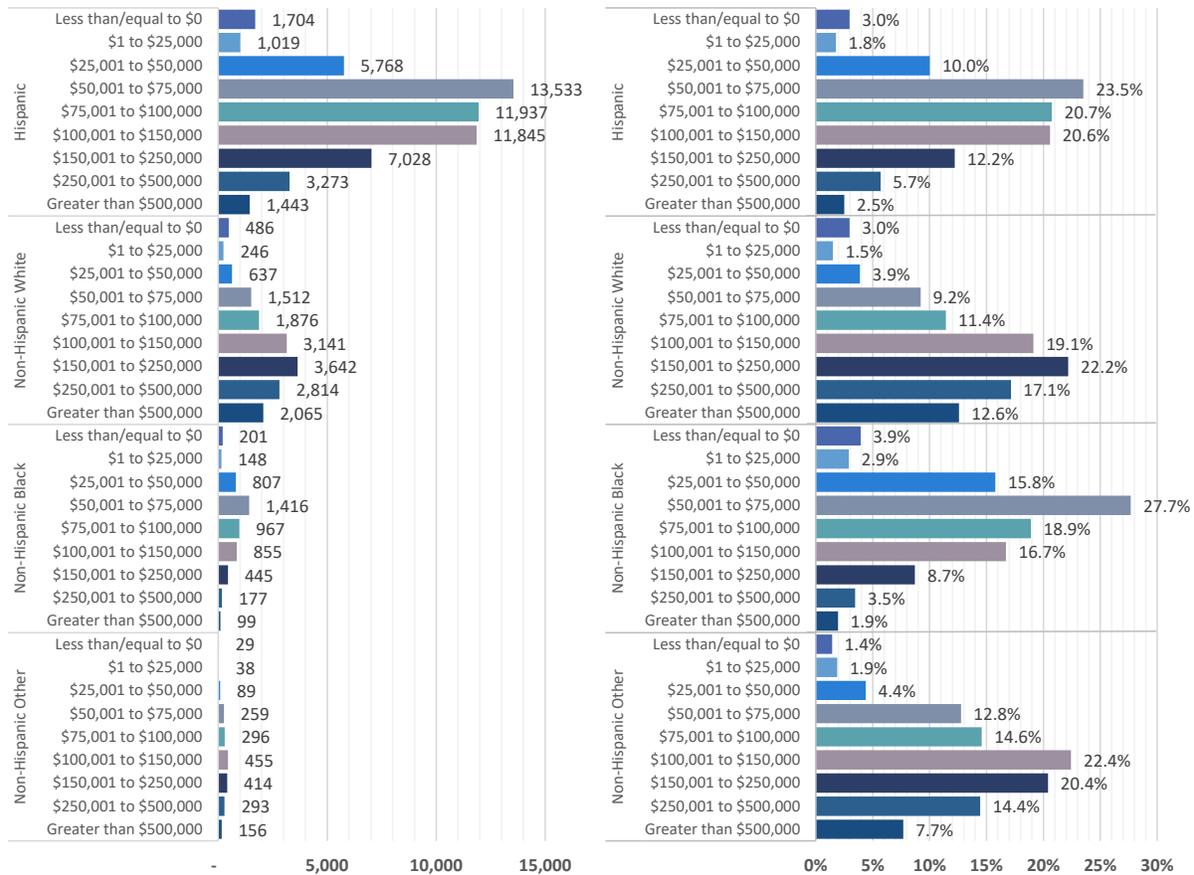


Data Source: Consumer Finance Protection Bureau HMDA Data; ACS 1 -year estimates.

Hispanics representing 69.1 percent of the population. Hispanic applications were under-represented by 13.6 percent. Likewise, Non-Hispanic Blacks account for 14.4 percent of the population, but only 5.1 percent of loan applications in 2021. On the other hand, for each year in the analysis the Non-Hispanic White share of applications exceeded their share of population, by 13.9 percent to 12.5 percent, a difference of 1.4 percent in 2021.

Figure 12 below illustrates the income distribution of applicants by race and ethnicity. In 2021, 59 percent of Hispanic applicants, and 69 percent of Non-Hispanic Black applicants had incomes less than or equal to \$100,000. In comparison, only 71 percent of Non-Hispanic White applicants had incomes that were greater than \$100,000. This is a very important distinction to bear in mind in the following discussion of spread loans and disparity.

**Figure 12: 2021 Loan Applications and Shares by Ethnicity and Race and Income**



Data source: Consumer Finance Protection Bureau HMDA data

HMDA reportable spread loans are loans with interest rates that are higher than the interest rate at which the average homebuyer borrows. The lender must report these high interest rate loans to the federal government. An analysis of HMDA data yielded the following conclusions:

**Table 10: Spread Loans by Race and Ethnicity, 2011, 2016 and 2021**

	2021				2016				2011			
	Loans	Loans with Spread	Percent	Average Spread	Loans	Loans with Spread	Percent	Average Spread	Loans	Loans with Spread	Percent	Average Spread
Hispanic	62,583	34,960	55.9%	0.54	42,904	2,921	6.8%	1.95	22,458	580	2.6%	2.33
Non-Hispanic White	17,352	9,345	53.9%	0.26	13,003	257	2.0%	2.24	10,657	153	1.4%	2.35
Non-Hispanic Black	5,958	2,787	46.8%	0.60	5,553	357	6.4%	1.90	2,717	94	3.5%	2.35
Non-Hispanic Other	2,133	1,065	49.9%	0.27	1,320	29	2.2%	2.13	856	5	0.6%	1.75
Race is N/A; Not Provided; or, Unknown Not Hispanic	1,055	484	45.9%	0.35	691	8	1.2%	2.01	344	5	1.5%	2.16
Ethnicity and/or Race is N/A; Not Provided; or, Unknown	26,100	6,930	26.6%	0.31	8,304	125	1.5%	2.95	5,024	31	0.6%	2.56
<b>Total</b>	<b>115,181</b>	<b>55,571</b>	<b>48.2%</b>	<b>0.46</b>	<b>71,775</b>	<b>3,697</b>	<b>5.2%</b>	<b>2.00</b>	<b>42,056</b>	<b>868</b>	<b>2.1%</b>	<b>2.34</b>

Source: Consumer Finance Protection Bureau online at: <https://www.consumerfinance.gov/data-research/hmda/>

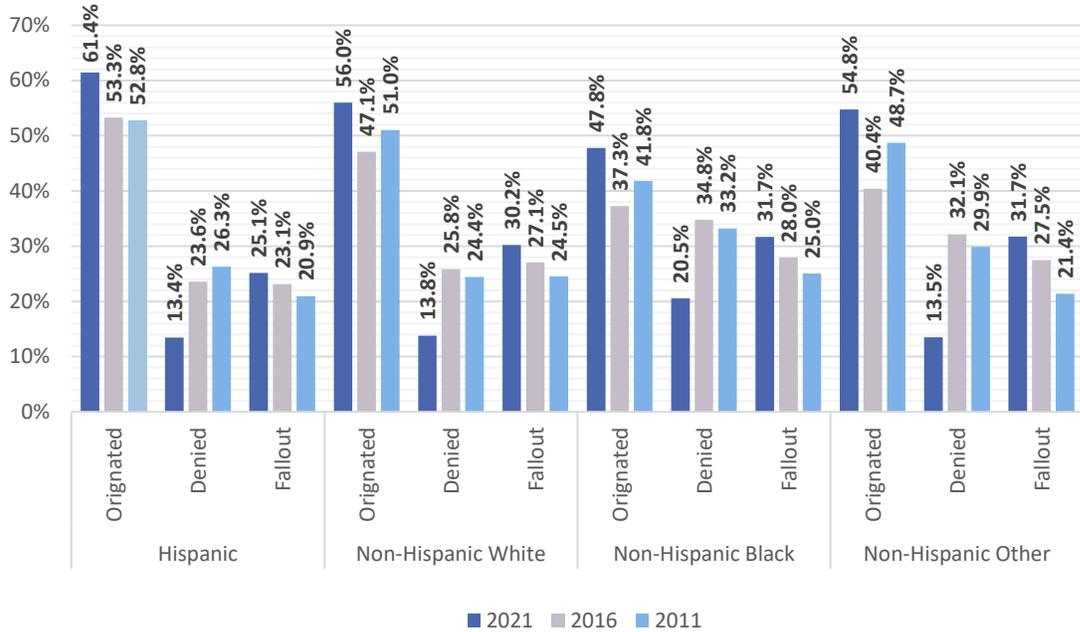
The HMDA rules for reporting spread-loans changed in 2018 and resulted in significant changes in the raw numbers reported. However, an interesting pattern emerged following the rule change. Prior to 2018, only loans with an interest-rate spread greater than 1.5 percent were required to be reported. Therefore, very few loans were reported under the law as can be seen in Table 13 above. These applicants may already have had financial difficulties with lower downpayments and higher loan-to value ratios. Beginning in 2018, virtually all loans were required to be reported. Therefore, the data present a more complete picture of mortgage activity and interest rate differences.

In 2021, the average spread for loans in Miami-Dade County was 0.46 percent. The highest spread was for Non-Hispanic Black applicants at 0.6 percent, that is, more than one-half a percent higher than the typical borrower with a similar loan would pay. The next highest spread was for Hispanic applicants at 0.54 percent. The spread for Non-Hispanic White applicants was 0.26 percent, the lowest of any group. To put this in context, an additional one-half of one percent on a loan of \$425,000 for 30 years with a minimum downpayment of 3.5 percent, would be \$115 dollars every month and more than \$50,000 over the life of the loan. 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.

Based on the foregoing data, some general analysis can be presented on the disparity of outcomes from applications by race and ethnicity. Figure 14 shows the outcomes of loan application by race and ethnicity. Table 13 compares application outcomes (originations, denials, and fallouts) of applicants for whom race and ethnicity is available with the outcomes of Non-Hispanic White applicants. The resulting ratio is called the disparity index. The numbers

in red indicate an outcome that is worse than the comparable outcome for a Non-Hispanic White applicant.

**Figure 13: Loan Action Taken based on Race and Ethnicity of the Applicant and Co-applicant**



Source: Consumer Finance Protection Bureau online at: <https://www.consumerfinance.gov/data-research/hmda/>

**Table 11: Disparity Index in Outcomes of Applications by Race and Ethnicity**

		Share of Applications			Disparity Index		
		2021	2016	2011	2021	2016	2011
<b>Hispanic</b>	Originated	61.4%	53.3%	52.8%	1.10	1.13	1.03
	Denied	13.4%	23.6%	26.3%	0.97	0.91	1.07
	Fallout	25.1%	23.1%	20.9%	0.83	0.85	0.85
<b>Non-Hispanic White</b>	Originated	56.0%	47.1%	51.0%			
	Denied	13.8%	25.8%	24.4%			
	Fallout	30.2%	27.1%	24.5%			
<b>Non-Hispanic Black</b>	Originated	47.8%	37.3%	41.8%	0.85	0.79	0.82
	Denied	20.5%	34.8%	33.2%	1.49	1.35	1.36
	Fallout	31.7%	28.0%	25.0%	1.05	1.03	1.02
<b>Non-Hispanic Other</b>	Originated	54.8%	40.4%	48.7%	0.98	0.86	0.95
	Denied	13.5%	32.1%	29.9%	0.98	1.24	1.22
	Fallout	31.7%	27.5%	21.4%	1.05	1.02	0.87

Data Source: Consumer Finance Protection Bureau, HMDA Data

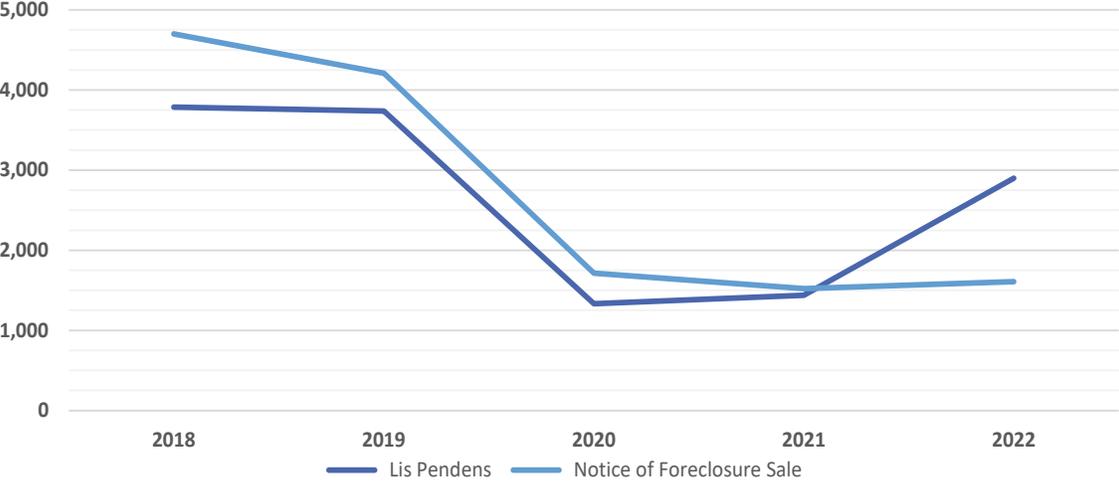
The data reveals that lenders originate significantly fewer loans per application for Non-Hispanic Black applicants than Non-Hispanic White applicants. Significantly more Non-Hispanic Black than Non-Hispanic White loan applicants have their loans denied, and more Non-Hispanic Black than Non-Hispanic White applicants chose not to follow through with approved loans with locked rates.

Although this data is not unequivocally indicative of discrimination, it clearly shows differential treatment of Non-Hispanic Black applicants. The HMDA helps to understand the

mortgage climate; however, it has significant limitations. The data is summary data that does not take into consideration how the loan decisions were made in individual cases. For instance, originations and denials by race and ethnicity are not controlled for the incomes of the applicants. Therefore, higher denial rates may be the result of other systemic economic factors that are out of the control of lenders. These and other issues must be taken into consideration when drawing conclusions from the data. The data does highlight undesirable and disparate trends in the county’s mortgage lending. The 2011, 2016 and 2021 HMDA data clearly shows a trend with respect to the high levels of denials of loans particularly to Non-Hispanic Black applicants. Additionally, Non-Hispanic Black and Hispanic applicants had proportionately lower rates of loan applications compared to their respective shares in the population. Also, they faced higher loan costs as indicated by the loan spread.

**C. Foreclosure Data**

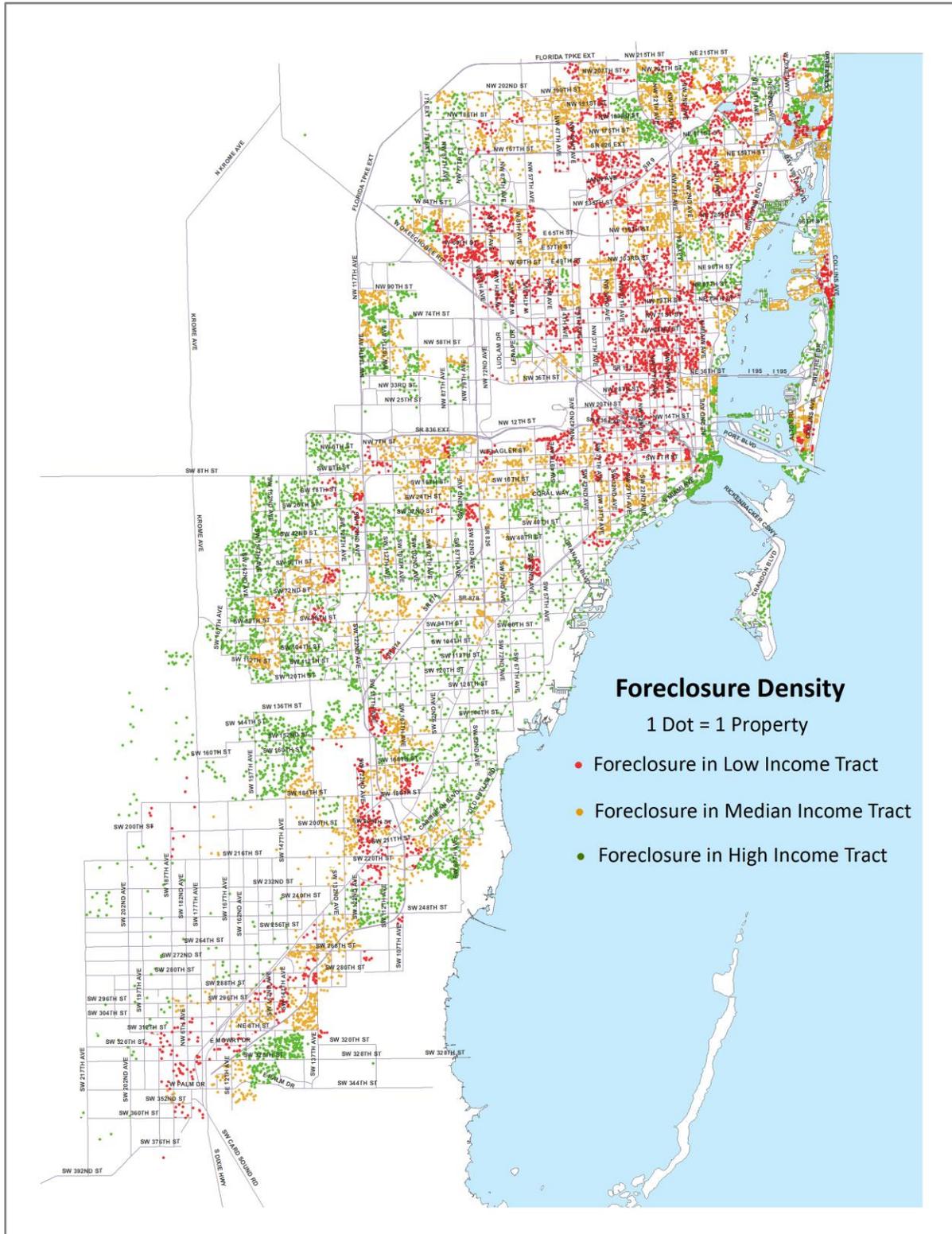
*Figure 14: Lis Pendens and Notices of Foreclosure Sales by Year*



Data Source: Attom Data Solutions.

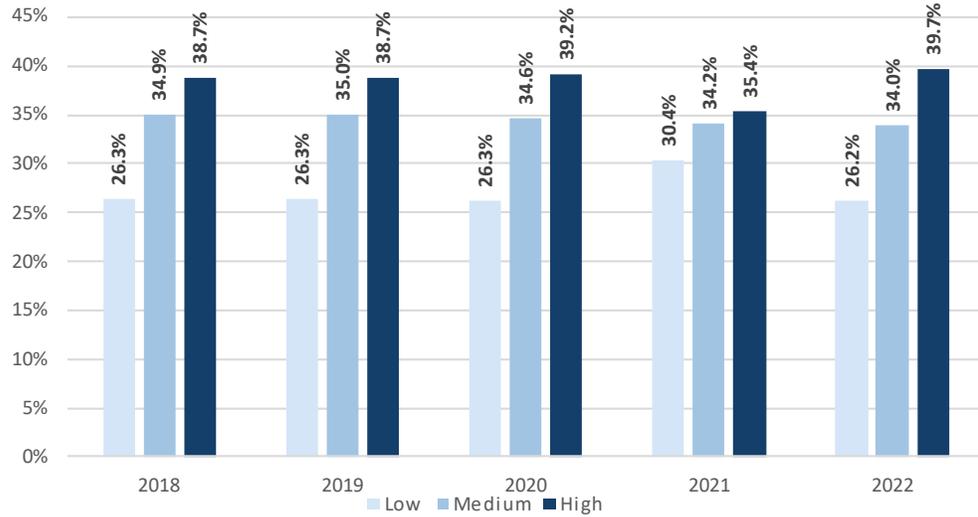
The post-great recession reality of foreclosures is one of very little activity. The figure above shows the incidence of lis pendens (the initial filing of intent to foreclose on a property) and Notices of Sales (the last step in the foreclosure process). Lis pendens have fallen over the five-year period from 3,800 to 2,900 filings. However, between 2021 and 2022, the number of lis pendens doubled from 1,400 in 2021. Notices of sale lag well behind the initial filing of lis pendens, sometimes by as much as two to three years. They fell from 4,700 in 2018 to 1,600 in 2022 and have yet to show an increase to match the increase of lis pendens. It must be stressed, that this current foreclosure environment is far different than the year following the great recession when the housing bubble burst. For example, in 2009 there were 64,000 foreclosure filings representing roughly 13 percent of all owner-properties. The numbers over the last five years have ranged between one-half and one percent of owner properties (See Figure 15).

Map 4:: Number of Foreclosure by Tract by Income Level, 2018-2021



Data source: Consumer Finance Protection Bureau HMDA data, U.S. Census, American Community Survey, 2017-2021, 5-year Estimates

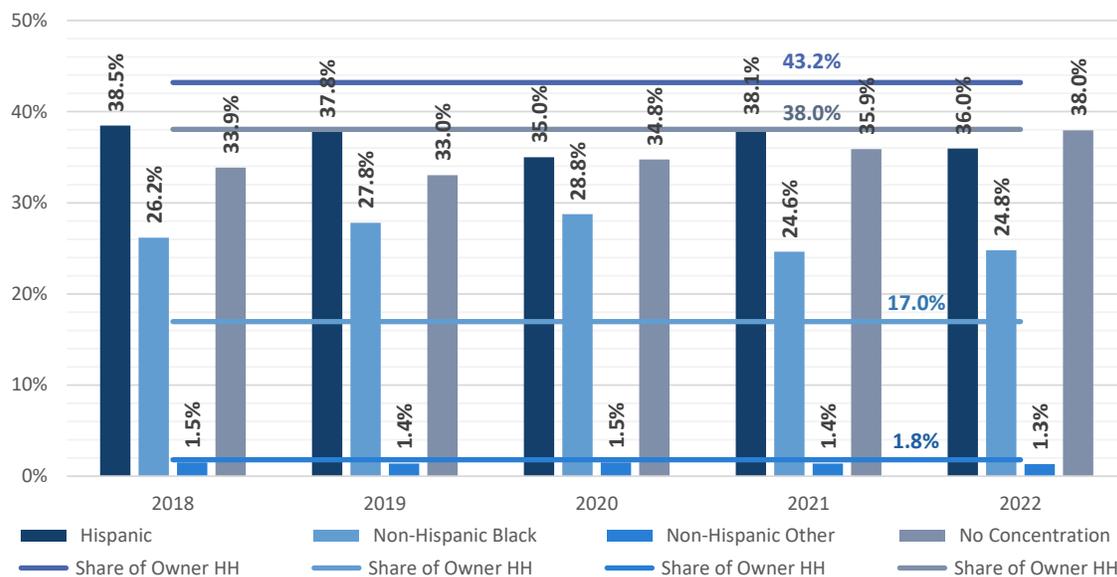
**Figure 15: Lis Pendens in Census Tracts by Median Household Income Levels**



Data Source: Attom Data Solutions.

Figure 16 illustrates foreclosure activity measured by lis pendens and the median household incomes for the census tracts in which they occurred. Consistently, the largest share, 39 to 40 percent, have been filed in high income tracts (the highest third of tracts sorted by median household income.) On average, between 34 and 35 percent of lis pendens were filed in middle income tracts (middle-third of tracts by median household income), and 26 percent occurred in low-income tracts (bottom third). The one notable exception was in 2021 when the share in low-income tracts surged to over 30 percent as the share in high-income tracts fell to

**Figure 16: Lis Pendens in Census Tracts of Minority Concentration**



Data Source: Attom Data Solutions.

35 percent. This was the result of an increasing number of filings in low-income tracts which accounted for virtually all the increase experienced between 2020 and 2021.

The figure above illustrates the incidence of lis pendens in tracts of minority concentration. Minority concentration is defined as the subject minority group having a 10 percent higher concentration in the census tract than in the county as a whole. For example, the Non-Hispanic Black population represents 13 percent of the total county population. Therefore, a census tract with a concentration of 23 percent or higher would identify a tract of Non-Hispanic Black concentration. This may not seem very significant, but in the case of the Non-Hispanic Black population, this rule captures 80 percent of the group's population.

The data shows that, compared to their share of owner-households, the Non-Hispanic Black share of lis pendens was far higher. According to the 2021 ACS, Non-Hispanic Black owner households represent 17 percent of all owner households. However, they averaged 26.4 percent of all lis pendens filed over that period. In comparison, Hispanic owner households accounted for over 43 percent of all owner households and accounted for just 37.1 percent of all lis pendens filed.

*Fair Housing Implications: Significant disparities in lending practices foreclosure activity indicate a need for training in Fair Housing and Fair Lending laws on the industry side, and consumer protection education regarding lending processes and recognizing and avoiding abusive lending practices on the homebuyer side.*

## V. PUBLIC OUTREACH

Miami-Dade County advertised the following public meetings on November 1 and November 2, 2023, to evaluate the need for affirmatively furthering fair housing in the community. Advertisements were placed in the Miami Herald, Miami Times, Le Floridien and Diario las Americas publications.

### South Dade Regional Library

November 1, 2023

10750 SW 211<sup>th</sup> Street, Cutler Bay, Florida 33189

1:00 PM to 2:00 PM

### North Dade Regional Library

November 2, 2023

2455 NW 183<sup>rd</sup> Street, Miami, Florida 33056.

1:00 PM to 2:00 PM

The AI is a comprehensive review and assessment of the jurisdiction's laws, regulations, policies, procedures and practices, and how these affect the location, availability, and accessibility of housing. In addition, it analyses how conditions, both private and public, may affect fair housing choice.

A draft copy of the Analysis of Impediments to Fair Housing Choice (AI) was made available for public review and comment for a period of no less than 30 days at the office of Public Housing and Community Development (PHCD), 701 NW 1<sup>st</sup> Court, 16<sup>th</sup> Floor, Miami, Florida 33136. The AI review and comment period commenced on Friday, October 27, 2023, and ended on Monday, November 27, 2023.

**All interested parties were invited to submit written comments from October 27, 2023 to November 27, 2023** to the attention of Ms. Tangie White, Division Director at Public Housing and Community Development (PHCD), 701 NW 1<sup>st</sup> Court, 14<sup>th</sup> Floor, Miami, Florida 33136 or via e-mail [communitydevelopmentservices@miamidade.gov](mailto:communitydevelopmentservices@miamidade.gov).

The following verbal comments were expressed by attendees at the meeting held on November 1<sup>st</sup> at the South Dade Regional Library:

- Applications are not always accessible to those who are not computer literate, especially seniors.
- Coconut Grove residents are pursuing a complaint against the City of Miami for housing practices. Their contention is that the housing practices are not in compliance with HUD rules.
- Look into accessory dwelling units as an option - revisit zoning to make sure it addresses

fair housing concerns.

- Possibility of having night or later meetings via Zoom or Teams.

The following verbal comments were expressed by attendees at the meeting held on November 2<sup>nd</sup> at the North Dade Regional Library

- Tracking of new housing units, both public and private
- PHCD should analyze the growth in the private housing market versus the public housing market
- Should we have additional protected classes above the ones that are federally protected?

## VI. CONCLUSIONS & RECOMMENDATIONS

### A. Identified Impediments to Fair Housing Choice

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 County'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.

Strategy 5: 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: Incentivize the development of mixed-income affordable housing properties through the annual request for applications funding cycle.

Strategy 2: Support/fund fair housing testing of real estate agents, rental housing providers, lending institutions, and mortgage brokers doing business in the jurisdiction to detect discrimination that may be prevalent in particular neighborhoods, rental communities, or condominium/homeowner associations.

Strategy 3: Support intensive efforts to educate the public about the existence and assets of racially diverse neighborhoods to overcome stereotypes among both minority and white home-seekers.

Strategy 4: 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 5: 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.

## VII. WORKS CITED

HOPE Forum, Spring 2022, 89<sup>th</sup> Edition. Miami-Dade Area Outreach. Page 7.

HOPE Forum, Summer 2022, 90<sup>th</sup> Edition, "Major Fair Housing Settlement Reached Department of Justice and Meta". Page 4.

HOPE Forum, Summer 2022, 90<sup>th</sup> Edition, "\$4.5 Million Settlement: Florida-Based Mortgage and Foreclosure Scam Targeted Hispanics". Page 4.

HOPE Forum, Summer 2022, 90<sup>th</sup> Edition. Miami-Dade Area Outreach. Page 7.

HOPE Forum, Fall 2022, 91<sup>st</sup> Edition. Miami-Dade Area Outreach. Page 7.

HOPE Forum, Winter 2022, 92<sup>nd</sup> Edition. Miami-Dade Area Outreach. Page 7

<http://portal.hud.gov/hudportal/documents/huddoc?id=lbph-03.pdf> Accessed May 18, 2023.

Guidelines issued pursuant to Section 1017 of the Residential Lead-Based Paint Hazard Reduction Act of 1992, Title X of the Housing and Community Development Act of 1992 (Public Law 102-550)

[https://www.hud.gov/sites/dfiles/Main/documents/VAWA\\_2022\\_Letter\\_MFH\\_CHPs.pdf](https://www.hud.gov/sites/dfiles/Main/documents/VAWA_2022_Letter_MFH_CHPs.pdf) Accessed on October 30, 2023. Housing Provisions of the Violence Against Women Act Reauthorization Act of 2022

[https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/VAWA](https://www.hud.gov/program_offices/fair_housing_equal_opp/VAWA) Accessed on October 30, 2023. Your Rights Under the Violence Against Women Act (VAWA): How to File a Complaint, Coverage and Protections

[https://nlihc.org/sites/default/files/2022-03/2022AG\\_6-02\\_Housing-Needs-Victims-Domestic-Violence.pdf](https://nlihc.org/sites/default/files/2022-03/2022AG_6-02_Housing-Needs-Victims-Domestic-Violence.pdf) Accessed on October 30, 2023. Housing Needs of Survivors of Domestic Violence, Sexual Assault, Dating Violence, and Stalking. National Low Income Housing Coalition

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

Florida Department of Health, Miami-Dade County, Lead Poisoning Prevention. Accessed on May 18, 2023.

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

HUD Sub-Recipient Guide to Conducting Environmental Reviews, Chapter 6, Lead-Based Paint and Other Federal Requirements, Accessed on May 18, 2023.

[https://www.hfamiami.com/files/ugd/54352e\\_4c659a075835489895635ebcc1566aa7.pdf](https://www.hfamiami.com/files/ugd/54352e_4c659a075835489895635ebcc1566aa7.pdf) Miami-Dade Housing Finance Authority, Listing of Affordable Rental Properties, Accessed on May 18, 2023.

[https://www.prweb.com/releases/the\\_law\\_offices\\_of\\_jibrael\\_s\\_hindi\\_wins\\_victory\\_for\\_low\\_income\\_tenants/prweb18255900.htm](https://www.prweb.com/releases/the_law_offices_of_jibrael_s_hindi_wins_victory_for_low_income_tenants/prweb18255900.htm) Fort Lauderdale, Florida. PRWeb. Accessed on May 4, 2023.