

## **Fair Housing Monitoring Response Statements**

### **Impediment #1 – Protected classes may experience disparities in home mortgage lending and high cost loans.**

No local action is required at this time.

### **Impediment #2 – There is inadequate information available to the real estate community, governments and the public about fair housing requirements and enforcement procedures.**

No local action is required at this time.

### **Impediment #3 – The public is not sufficiently aware of their Fair Housing rights and how to obtain the assistance necessary to protect those rights.**

- The City of Orange has passed a Fair Housing Resolution
- Posters and brochures placed in schools.
- The City of Orange financially sponsors and participates in the Southeast Texas Fair Housing Conference held each April.
- Fair Housing brochures were placed at City Hall and social service facilities for distribution.
- Proclamations are issued each April declaring April as Fair Housing Month. The Proclamations are posted at the Fair Housing Conference.
- Partnered with Delta Sigma Theta Sorority, who adopted Fair Housing as their outreach project for the month of April, speaking to Churches, Civic Organizations and distributing brochures and other informational items on Fair Housing.

### **Impediment #4 – “Not in my Backyard” (NIMBY) may be an impediment to fair housing in Texas communities.**

- The City of Orange developed an “Anti-NIMBYism plan.

### **Impediment #5 – Certain governmental policies and practices may not meet current HUD policy concerning affirmatively furthering fair housing. Jurisdictions should act to ensure that their policies and procedures affirmatively further fair housing.**

**address mal-distribution of resources, and that they do not unnecessarily impact housing choice.**

- The City of Orange reviewed its long-term infrastructure plan and determined it does not promote racial concentrations or otherwise inadvertently result in disparate treatment of members of protected classes as it related to the availability of housing.
- The City of Orange has strategy areas with high concentrations of minority and low-income populations. CDBG funds have been used in these areas to rehabilitate housing, rehabilitate public facilities, provide social services, and repair/replace infrastructure. All policies and procedures are applied equally city-wide.
- An official policy has not been developed for training among new senior staff members and/or elected official; however, training opportunities have been provided through the South East Regional Planning Commission of which Orange takes advantage of.
- The City of Orange partnered with the Office of Fair Housing & Equal Opportunity, U. S. Department of Housing & Urban Development, Houston Field Office, Region VI, South East Regional Planning Commission and the City of Beaumont to provide a full day of Section 3 training targeting not only Grantees, but Contractors, Grant Administrators, Elected Officials, Section 3 Coordinators, and Developers.
- The City of Orange partnered with the Office of Fair Housing & Equal Opportunity, U. S. Department of Housing & Urban Development, Houston Field Office, Region VI, South East Regional Planning Commission and the City of Beaumont to provide a full day of Fair Housing training targeting not only Grantees, but Grant Administrators, Nonprofit Organizations, Homeless providers, Realtors, Banking and Lending Institutions and School Administrators. This training was an in depth training in Fair Housing which also covered Single Gender Housing, Equal Access, and the Lesbian, Gay and Transgender Rule.
- The City of Orange will work with state agencies to determine a demographic and economic profile of victims of natural disaster and establish goals for assisting these populations in no less than the proportions they were impacted by the disaster. There has been no disaster since Hurricane Ike.

**Impediment #6 – Governmental entities at all levels do not appear to have been proactive in the enforcement of both the Fair Housing Act and the obligation to affirmatively further fair housing. The State and subrecipients should implement a robust and effective structure for identifying and pursuing suspected violations.**

- The City of Orange does not currently have a testing program for Fair Housing violations. Staff will continue to develop this policy.
- The City of Orange has not received State language for documents concerning housing and community development programs that are provided to the public.
- The City of Orange has developed a Fair Housing complaint process although clear procedures have not been received from the State.
- The City of Orange has placed on the City Website information on Fair Housing and contact information for complaints and/or questions, including the City of Orange Fair Housing Officer.
- A log sheet will be kept for fair housing complaints. No complaints have been received.
- The City of Orange has not developed a remedial plan for developers, landlords, home sellers, and others whose actions may be inconsistent with Fair Housing laws and regulations. Staff will continue to investigate and develop a plan which will be beneficial to everyone.

**Impediment #7 – Many local jurisdictions have zoning codes, land use controls, and administrative practices that may impede fair housing choice and fail to affirmatively further housing.**

- The City of Orange has not received suggested guidelines from the State for conducting a Fair Housing Review.
- Incentives for fair housing are on a case-by-case basis. In the past, building permit fees and tap fees were waived for affordable housing projects. CDBG funds were used to provide infrastructure (drainage, street construction, etc.) for affordable housing.

**Impediment #8 – Inadequate planning for re-housing after an emergency situation creates a situation where persons who are uninsured or under-insured, low income, or special needs can be displaced for long periods of time.**

- The City of Orange has reviewed the zoning requirements and other land use provisions and has provided waivers or other accommodations for post-disaster housing.

**Impediment #9 – There are impediments in public and private actions and private attitudes to housing choice for persons with disabilities.**

- The City of Orange reviewed codes and ordinances and found no impediments relating to special needs persons.
- The City of Orange refers housing after a disaster to the South East Texas Regional Planning Commission which handles most all housing in the region.

**Impediment #10 –**

No location action is required at this time.

**Impediment #11 – Loss of housing stock in Hurricanes Dolly and Ike compounded the shortage of affordable housing in disaster recovery areas. This shortage is particularly acute in safe, low-poverty neighborhoods with access to standard public services, job opportunities and good schools.**

- No local action is required at this time.

**Impediment #12 – Lack of financial resources for both individuals and housing providers limits Fair Housing choice. Using an effective program under Section 3 of the Housing and Urban Development Act of 1968 may help members of protected classes gain economic opportunities necessary to allow them to exercise fair housing choice.**

- The City of Orange developed a Section 3 Plan.
- Section 3 Training was provided at the South East Texas Regional Planning Commission for developers, contractors, and city staff in June of 2013.

**Impediment #13 – Location and lack of housing accessibility and visitability standards within political jurisdictions limits fair housing choice for persons with disabilities.**

- A resolution passed adopting a city policy requiring all city infrastructure projects to meet ADA requirements.
- The City of Orange has an apartment complex (funded through Section 811 funds) which caters to individuals with disabilities.
- All apartment complexes and public housing must adhere to ADA requirements.
- Several medical facilities are available throughout the city limits.
- Several LIHTC complexes have been built in Orange. All developers were able to justify adequate facilities to serve housing developments.

**Impediment #14 – Many colonias residents live in developments that have insufficient infrastructure and protections against flooding and are impacted by flooding beyond events like Hurricanes Dolly and Ike.**

- Not applicable to City of Orange.

**Impediment #15 – Minority neighborhoods in disaster areas are primarily served non-regulated insurance companies that do not adhere to underwriting guidelines and may be discriminated against in the provision of insurance. Texas has passed aggressive statutes to prevent insurance “redlining.” National research indicates that protected classes face unwarranted disparities in the cost of insurance, the amount of coverage, and cancellation of policies without notice to the homeowner.**

No local action is required at this time.

**Impediment #16 – Many jurisdictions do not have adequate Analysis of Impediments to Fair Housing or Fair Housing Plans, and do not keep sufficient records to their activities.**

- The City of Orange has received a copy of the Analysis of Impediments for the State of Texas and a copy of the Conciliation Agreement. City staff keeps a file on all activities regarding Fair Housing.
- The City conducted and developed an Analysis of Impediments in 2009. This AI was reviewed and passed desk monitoring by the GPO, Washington DC and HUD Houston Field Office with no mention of further needs or shortcomings.
- The City of Orange uses the FFAST form process to analyze impediments to fair housing.