



CITY OF SOMERVILLE, MASSACHUSETTS
MAYOR'S OFFICE OF STRATEGIC PLANNING & COMMUNITY
DEVELOPMENT
JOSEPH A. CURTATONE
MAYOR

Assessment of Fair Housing

October 2017

A comprehensive fair housing analysis for the City of Somerville in response to the Department of Housing and Urban Development's (HUD) Affirmatively Furthering Fair Housing (AFFH) rule.

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I. Cover Sheet

1. Submission date: October 6, 2017
2. Submitter name: City of Somerville
3. Type of submission (e.g., single program participant, joint submission): Single program participant
4. Type of program participant(s) (e.g., consolidated plan participant, PHA): Consolidated plan participant
5. For PHAs, Jurisdiction in which the program participant is located: N/A
6. Submitter members (if applicable):
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 - e. City: Somerville
 - f. State: MA
 - g. Zip code: 02143
8. Period covered by this assessment: 2018-2022
9. Initial, amended, or renewal AFH: Initial
10. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;
11. The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o), and 903.15(d), as applicable.

Joseph A. Curtatone
Print Name

City of Somerville, MA Mayor
Program Participant/Title

Signature

Date

 10/5/2017

II. Executive Summary

The City of Somerville, Massachusetts submits this Assessment of Fair Housing (AFH) in response to requirements under the federal Department of Housing and Urban Development's (HUD) Affirmatively Furthering Fair Housing (AFFH) rule released July 16, 2015. The intent of the rule is to ensure that agencies and municipalities receiving HUD funding to implement programs work to affirmatively further fair housing, as called for under the federal Fair Housing Act of 1968. In issuing its guidelines on AFH preparation, HUD noted that the assessment is designed to help participants identify the fair housing barriers that exist in their communities, what the contributing factors to these barriers are, and what participants can do to address them.

The AFH document encompasses analysis of six fair housing-related subject areas: *Segregation and Integration, Disparities in Access to Opportunity, Disproportionate Housing Needs, Publicly Supported Housing, Disability and Access Issues, and Fair Housing Enforcement, Outreach Capacity, and Resources*. (Enforcement, Outreach Capacity and Resources comprised a single category.) In its analysis, the City used data version AFFHT0003; images of maps and tables used in the report are included in the PDF version of the AFH for reference in the Supporting Documents of the HUD User Interface.

AFFH guidelines called for a community engagement process to develop specific AFH goals; the City of Somerville took this effort seriously and undertook a robust outreach effort. Primary components of our community outreach work are listed below and followed by a brief summary of the goals that they and associated analysis yielded in each of the areas identified above. Efforts included:

- An online survey to gather feedback from residents. Additionally, the Somerville Housing Division (SHD) maintains an Inclusionary Housing Listserv, with over 2,500 emails and 175 mailing addresses; all individuals on the Listserv were notified of the survey and public meetings.
- Those with only mailing addresses on the listserv, who reside in Somerville, were mailed a survey and notice of public meetings to be held in four (4) languages. One hundred twenty eight (128) survey responses were collected.
- Two public meetings on the AFH were hosted by staff of the Somerville Housing Division (SHD).
- SHD staff also attended 11 community meetings and events in an effort to engage the community and publicize public meetings.

The following goals within each focus area were identified through the community engagement process:

Segregation and Integration

- Build on current efforts to preserve naturally occurring affordable units and other multi-unit properties alongside increasing awareness/advocacy, education, programming, and training in an effort to foster a well-rounded approach to addressing the need for affordable housing in its entirety.
- Provide support to tenants in an effort to educate residents on fair housing law and protect against discrimination based on race, nationality, familial status, etc. and incentivize developers/property

owners to build/maintain more affordable housing in alignment with fair housing laws and tenant protections.

- Work toward new construction, including affordable housing, being distributed throughout Somerville in alignment with the Somervision plan and the City's zoning overhaul that is currently being drafted.
- Continue to provide direct access to housing resources to people who speak languages other than English.

Disparities in Access to Opportunity

- Complete the Massachusetts Bay Transportation Authority's Green Line Extension (GLX) in order to better accommodate residents across Somerville, including students who are interested in attending schools outside of their neighborhood.
- Further develop, support, and continue to increase training opportunities/programs along with translation services for low-skilled workers/workers who speak limited English in conjunction with promoting policy changes and increasing awareness and advocacy efforts, ensuring the protection of the large immigrant population in Somerville.
- Support ongoing efforts of Somerville Public Schools to develop new programs and policies that address equity within the school system.
- Continue to pursue projects that create physical changes to Somerville's landscape that reduce environmental health hazards.

Disproportionate Housing Needs

- Utilize current policies/programs and the proposed overhaul to the City's zoning ordinance to expand housing supply via new development and preservation of existing housing.
- Expand current efforts to get as many units out of private, speculative market through acquisition and preservation of permanently affordable housing.
- Leverage the Sustainable Neighborhoods Coordinator position and a restructured Housing Division position to conduct critical research, project management, and analysis that will allow the Housing Division to continue to implement the full range of new policies, programs, and resources recommended by the Sustainable Neighborhoods Working Group.
- Support the housing needs of our most vulnerable residents, including those who have experienced sexual and/or domestic violence and are in need of emergency housing services and support.
- Explore new ways to expand the housing stock in Somerville by better understanding how our zoning ordinance can be revised to allow for more creation of affordable units.
- Explore regional collaboration to better address housing affordability and housing choice issues in the Greater Boston Region.
- Expand efforts to conduct outreach to all communities in Somerville in order to disseminate needed information regarding housing policies, programs and opportunities and provide referrals to other organizations as needed in order to connect people with available services.

Publicly Supported Housing

- Work towards ending housing discrimination by increasing awareness/advocacy, education, and programing/training.
- Promote policy changes that will improve the experiences of those trying to access public housing.
- Continue to strengthen knowledge and enforcement of the City's condominium conversion ordinance and, potentially, update the ordinance itself.

Disability and Access Issues

- Implement the City of Somerville's adopted Americans with Disabilities Act (ADA) Title II multi year Transition Plan to improve accessibility to all city buildings, programs, services, roadways and sidewalks.
- Provide a resource list to residents with affordable units including descriptions on accessibility features like wheelchair accessible parking, ramps, elevator access, etc.
- Conduct research and studies to better understand the housing needs of people with disabilities.
- Improve accessibility of public spaces in Somerville by building on the improvements previously made to the East Broadway streetscape and continuing to invest in infrastructure improvements in the area.
- Provide increased information about reasonable accommodation requests to residents and staff.
- Increase housing opportunities for people with disabilities.

Fair Housing Enforcement, Outreach Capacity, and Resources

- Increase outreach to tenants, landlords, and residents in general, on fair housing issues through targeted campaigns.
- Look into potential funding sources to support Fair Housing Commission programs and activities.
- Explore other ways to structure the Fair Housing Commission so that it is consistently populated and staffed to meet the needs of local residents.
- Explore regional collaborations with the Metropolitan Boston Housing Partnership Fair Housing Project, the Suffolk University Law Housing Discrimination Testing Project, and the Greater Boston Fair Housing Center for assistance with advocacy, outreach, and training.

Despite repeated funding cuts sustained on the federal and state levels over the course of decades, Somerville remains committed to addressing the housing and related challenges confronting its residents. Somerville has dramatically increased funding resources available to preserve, create and support housing over the past several years, and is committed to continuing those efforts. The City is actively taking steps to maintain and expand existing programs in addition to developing new ways to address housing barriers in a holistic manner, recognizing the connection between housing and an array of other factors including health, access to transportation, employment, and/or access to quality education. Somerville will continue its work to achieve the goals identified in its Assessment of Fair Housing, and will continue to collaborate with other departments, agencies, organizations and residents, to engage the full community in that effort.

III. Community Participation Process

1. *Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board and other resident outreach.*

The Somerville Housing Division (SHD) undertook a number of activities to broaden and encourage meaningful community engagement throughout the AFH process. Community engagement efforts were targeted towards community groups serving protected populations in Somerville as well as individual residents with membership in protected classes. All resident comments, however, were welcomed and taken into consideration.

Federally, the Fair Housing Act (FHA) prohibits discrimination based on national origin, color, race, religion, disability, sex and familial status (e.g., families with children) when renting, buying or securing a home. In Massachusetts, fair housing laws go further, by prohibiting discrimination in housing-related activities and transactions because of one's age (for those over 40), receipt of government assistance, military status, gender identity/expression, sexual orientation, ancestry and genetic information. These are all referred to as protected classes under the FHA.

In an effort to encourage community participation and convey the intent of affirmatively furthering fair housing, SHD branded its effort Welcoming and Inclusive Neighborhoods Somerville (WINS). An introduction to WINS was first published on the City's website (www.somervillema.gov/wins) on May 19th, 2017.

Resident Outreach:

An online survey was constructed to gather feedback from residents and was fully translated into Portuguese and Spanish and partially into Haitian Creole, the three highest and most common limited English proficiency (LEP) languages in Somerville, respectively. It was made available on the City of Somerville's website at www.somervillema.gov/WINS from May 19, 2017 to July 17, 2017. A copy of the survey can be found in the Supporting Documents. Hard copies of the surveys were made available at community events, local organizations and tabling events in each language. They were also handed out during public meetings and focus groups. Additionally, the SHD maintains an Inclusionary Housing Listserv, with over 2,500 emails and 175 mailing addresses. Everyone on the listserv with an email was notified of the public meetings and the survey electronically. Those with only mailing addresses on the listserv, who reside in Somerville, were mailed a survey and notice of the public meetings in all four (4) languages. One hundred twenty eight (128) survey responses were gathered and data from these surveys can be found in later sections.

SHD staff organized and hosted two public meetings to provide residents with opportunities to learn more about AFFH and give feedback about their experiences in Somerville. Meetings involved a short presentation and breakout sessions facilitated by SHD staff and took place on June 8, 2017 at the Clarendon Hill Towers and June 13, 2017 at the East Somerville Community School from 6:00-7:30pm. The meetings were held in locations convenient to residents from the City's publicly supported housing, in an effort to encourage their attendance. Both were located in ADA accessible locations and Portuguese, Spanish and Haitian Creole interpreters were present at both meetings. Fifteen (15) residents attended the June 8th meeting and thirteen (13) attended the meeting held June 13, 2017. A detailed agenda of each meeting can be found in the Supporting Documents.

SHD staff, Fair Housing Commission (FHC) members and a volunteer tabled at community events to speak with the community about their housing experiences, publicize the public meetings and encourage residents to participate in the community survey. During these tabling events, staff briefly introduced the WINS project, handed out flyers with information about the meetings and a link to the survey (as well as paper versions of the survey), and engaged residents in activities and conversations pertaining to fair housing. Maps from the HUD AFFH Tool were also available for residents to view, ask questions and to engage in discussion while tabling.

Tabling also provided residents and SHD staff with an opportunity to speak about other issues residents are facing and to introduce other Housing and City programs available to them. Housing Division staff took photos and notes of each interaction and activity. Events SHD staff and volunteers attended included:

1. ResiStat* Ward 7 Meeting- May 22, 2017
2. ResiStat Ward 1 Meeting- May 23, 2017
3. ResiStat Ward 2 Meeting- May 30, 2017
4. ResiStat Ward 4 Meeting- June 1, 2017
5. Broadway Somerstreets/Carnaval- June 4, 2017
6. FitRow Health & Wellness Day- June 10, 2017
7. Save Our Homes Walk- June 11, 2017
8. How to Fix the Word Fest- June 18, 2017
9. Nepali Festival- July 9, 2017
10. English Language Learners Class- July 13, 2017
11. ArtBeat - July 15, 2017

* ResiStat meetings are held to provide residents with the chance to get updates on major projects in the City, find out what's going on in their neighborhood, and meet and chat with neighbors and elected officials (adapted from:

<http://www.somervillema.gov/events/2017/05/04/resistat-meeting-ward-3>)

SHD staff ultimately determined that public meetings like the ones listed above were not an entirely effective way to engage with members of protected classes. Housing Division staff therefore expanded

their approach and reached out to community organizations that serve protected classes to ask that they host focus groups. Four organizations agreed, and focus groups were organized and held at:

- Mystic (public housing development) Tenants Association
- Somerville Public Schools Parent Information Center
- One of Somerville Homeless Coalition's shelter locations
- Affordable Housing Organizing Committee of Somerville Community Corporation, a Somerville-based community development corporation

SHD staff employed multiple media outlets to publicize the community meetings, focus groups and the WINS Survey. On May 19th, 2017 a page on the City's website was published introducing the AFFH and WINS. The page was accessible under the Housing Division page and could easily be translated to numerous languages including the languages most spoken by Somerville's residents with limited English proficiency (LEP). The page included an introduction to fair housing, the AFFH, and WINS; a request to complete the survey; event flyers; and a link to sign up for the WINS listserv (Those on the listserv were notified of meetings and events and were emailed the draft when it was released).

Posts were made to the City of Somerville's Facebook Page and City of Somerville's Twitter account leading up to events. Mayor Joseph Curtatone, the Fair Housing Commission, Somerville Neighborhood Updates, and Shape Up Somerville all shared and/or placed posts on their Facebook pages as well. Their posts were also shared by community members and organizations prior to the public meetings and other community events. An advertisement was also published in *El Mundo*, a Spanish language newspaper in the greater Boston area. Flyers were published at local elementary schools, affordable housing developments, local businesses, three public libraries, City Hall, City Hall Annex, and other City buildings and community spaces. Meetings were also publicized by resident coordinators and tenant organizations at housing developments. The City has a weekly newsletter, *ResiStat*, on which the survey link and announcement of public meetings and the AFH draft release were provided.

As per the the City's most recent Five Year Comprehensive Plan, a draft of the AFH was released to the public for comment on August 18th, 2017. The Housing Division subsequently held a community hearing on August 24, 2017; the meeting was held at East Somerville Community School, as a location convenient to residents. Comments were accepted via various communication methods including online, via email, in person, over the phone or by mail.

Community Organization Outreach:

A list of relevant community organizations was developed in May 2017 and can be found in the Supporting Documents. The organizations identified serve or work with constituents who are members of HUD-protected classes. WINS commenced on May 4th, 2017 when SHD hosted an Equity and Inclusion Conversation with community organizations and City staff at the Central Public Library during lunch. This meeting was one of a series of Equity and Inclusion Conversations hosted by the City's Department of Health and Human Services. They began after the conclusion of the 2016 election season to provide residents a platform for discussion.

The meeting provided an introduction to the AFFH Rule and AFH, followed by a facilitated discussion to gather community organizations' experiences of fair housing issues in Somerville. A detailed agenda of the meeting can be found in the Supporting Documents. Attendees were also given surveys to distribute to their constituents and asked to provide any data or local knowledge that may be helpful in preparing the AFH. Interested stakeholders were encouraged to aid in the facilitation of focus groups with particular groups within the community in partnership with the Housing Division. At the end of the meeting a "Community Organization Survey" was distributed to attendees and sent electronically to those who were not able to attend. This survey can also be found in the Supporting Documents. After the meeting, organizations were sent an email with additional information on the AFFH and WINS program and asked to join a Community Group meeting. This second meeting was held on June 19, 2017 at 10am.

2. *Provide a list of organizations consulted during the community participation process.*

- Cambridge and Somerville Legal Services (CASL)
- Community Action Agency of Somerville (CAAS)
- Somerville Homeless Coalition (SHC)
- The Welcome Project
- Somerville Public Schools (SPS)
- Big Sister Association of Greater Boston
- Fair Housing Commission (FHC)
- Clarendon Hill Towers Tenants Association
- Mystic Tenant Association
- Somerville Parent Information Center
- Somerville Council on Aging
- Immigrant Services Provider Group
- Somerville Cambridge Elder Services (SCES)
- Somerville Community Corporation- Affordable Housing Organizing Committee(SCC)
- Walnut Street Center
- Vinfen
- Somerville Housing Authority (SHA)
- Metropolitan Boston Housing Partnership (MBHP)

3. *How successful were the efforts at eliciting meaningful community participation? If there was low participation, provide the reasons.*

Staff involved with the extensive efforts to elicit meaningful community participation would characterize the results as fairly successful. A relatively large number of residents were reached for feedback, but the survey proved to be of limited value. It was determined, toward the end of community engagement efforts, that some data collected from the surveys was unusable because of conversion problems between the online and paper versions of the survey. The survey itself was constructed very early on in our AFH process, before staff could fully realize what kind of information would be most helpful for the report. In retrospect, we realized the survey may have been excessively long (in an effort to capture potentially relevant information), with the survey's length serving to dissuade some potential respondents from participating. It appears that the populations of respondents skewed somewhat toward women who are

white and over 60. However, we do believe that by doing targeted outreach at housing developments and with help from local community organizations, we were able to gather diverse feedback from the community that went beyond the the survey.

4. *Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.*

The list of “Overarching Themes” below provides a summary of themes that were recorded with relative frequency from survey responses, tabling events, focus groups, and community organization outreach throughout the engagement process. The subsequent list of “Overarching Solutions” tracks solutions that residents provided during outreach. More detailed lists of comments based on the topic area are provided as well. Finally, a list of general comments that could not be sorted into a specific topic is provided at the end of this section. Any comments or views that did not pertain to fair housing issues were not included. Lists are not organized based on frequency of comment. Please note: The following six pages of overarching themes and solutions are a list of public comments for the purpose of information collection recorded by SHD, they are not the opinions of the City.

Overarching Themes and Solutions:

Overarching Themes

1. Affordability- came up in EVERY conversation
 - a. Economic displacement, displacement due to revitalization strategies
2. Section 8 doesn't cover costs of housing
3. Lack of information about rights and laws
4. Lack of education for landlords (vouchers, etc.)
5. Condo Conversions are driving up prices
6. Long waiting lists for affordable housing
7. Discrimination: race, recipients of public assistance, languages spoken, accent, households with kids (lead paint)
 - a. Those who do experience discrimination don't have the time or capacity to report it, they're more focused on trying to find a place to live
8. Not enough homes for families
9. Navigating information about affordable housing is confusing, particularly for non-english speakers
10. Jobs (that are well-paying), particularly for low-skilled workers and those who don't speak English, are hard to come by
11. Buses do not run north south
12. Need for more homeownership opportunities for more stability in terms of housing price
13. Lottery system is unfair and doesn't address needs of individuals
14. Luxury apartments are unaffordable to many who currently live in Somerville
15. Most residents do not know how to report a fair housing issue, nor do they know of local organizations that address fair housing

16. Low income tenants (particularly those living in public housing) are more likely to be living close to the freeway and pollution
17. Fear induced by current political situation- people feel as though race and ethnicity-based discrimination and even violence is more rampant and socially acceptable

Overarching Solutions

1. Rent control
2. Tax breaks/punishments for landlords who rent under/over market rate
3. Provide information in a centralized location and have it available in multiple languages (Office of Housing Stability)
 - a. Affordable housing options and how to navigate them
 - b. Section 8
4. Support for those who use Section 8
5. More unifying events/festivals to bring people across race/class lines
6. Stronger and more useful Fair Housing Commission- active in helping residents address fair housing issues
7. Inclusionary zoning units could prioritize those at risk of displacement
8. More protections for those at risk of eviction
9. Raise rental allowance (Section 8)
10. Get creative with potential ways to provide affordable housing: community land trusts, cooperatives, tiny houses, etc

Topic-Specific Comments:

People with Disabilities

A total of 13 themes were identified:

1. Housing affordability
2. Inaccessible housing for people with disabilities (e.g., units do not have accessibility features)
3. Language barriers
4. Recertifications of leases
5. Not enough services for people with mental illnesses
6. Finding work is very difficult for people with disabilities or who have mental illnesses - gaps in resumes
7. City Hall Annex is inaccessible because elevator often breaks down
8. Not enough affordable housing for people with disabilities
9. Tenant screening- postings and brokers seek "young professionals"
10. Trouble accessing roommate market and limited supply of single room occupancy housing
11. Current public transportation options make it hard to look at housing opportunities -limits search parameters
12. Those with "invisible disabilities" such as behavioral health conditions are often not informed or aware of right to reasonable accommodation to help maintain/obtain tenancy
13. Many of the affordable housing options are not handicapped accessible

Contributing Factors:

1. Lack of community-based supportive services
2. Lack of rail service to most parts of the City
3. Not enough affordable housing for people with disabilities (not covered by SSDI/SSI)- concentrated in specific areas
4. Lack of subsidies
5. SHA hasn't increased its payment standard - far below FMR
6. Private housing often not built accessible
7. Lack of education about reasonable accommodations laws

Solutions:

Proposed solutions included 5 suggestions:

1. Consult with disabled residents or groups that represent them and include them in decision-making processes
2. Design complete streets that include features to make travel easier for non-able-bodied residents.
3. Target areas in the City with more disabled residents for street improvement and traffic calming - widening curbs at busy intersections
4. More funding for accessible units
5. Food pantry for people who are mobility bound that delivers to homes

Families with Children

Twelve themes were identified as issues impacting families with children:

1. Housing affordability
2. Tenants subletting substandard spaces (attics/basements that are not meant to be for living/bad living conditions without AC/heat, kitchen, showers, etc.)
3. Little to no awareness of rights
4. Discrimination against families with young children to avoid need for Lead Paint abatement
5. General discrimination
6. Single parents find it hard to support families due to cost of living
7. Negligence (bed bugs, etc.)
8. Small units don't accommodate large families
9. Advertising for apartments is targeted for young professionals
10. Without school buses, parents often cannot send children to the school of their choice.
11. Overcrowding
12. Women paid less than men and often are heads of household

Contributing Factors:

1. High price of market (unfair market prices)
2. Rising rents (displacement)
3. Low vacancy rate
4. Units don't have enough rooms, particularly those that are affordable (need more 3 bedroom units for families)
5. Lack of work/low paying jobs

6. No enforcement of law
7. Apartments are in bad condition
8. Lack of empowerment to speak up and claim your rights
9. Economic displacement
10. No knowledge of laws/rights

Proposed solutions:

1. Require multi-bedroom apartments in new developments
2. CPA (Community Preservation Act) funds - consider long term rental assistance. More rental assistance (HUD/State MRVP/Project based)

People Receiving Federal Assistance

Nine themes were identified, in terms of issues particularly impacting people receiving federal assistance:

1. Housing affordability
2. Vouchers don't cover the cost of much of the housing in Somerville
3. Restricted choices- Section 8 holders can only choose from limited housing that is often less than ideal (high rent, remote neighborhood)
4. System is corrupt, housing given to those who don't need it the most
5. Long waiting lists
6. Not enough larger units (3 bedrooms) for families
7. Hard to compete with students
8. Subsidies don't cover broker fees, moving fees
9. Those who do face Section 8 discrimination don't have the time or capacity to report it.

Contributing Factors:

1. Lack of documentation stops people from applying
2. Displacement
3. Trump administration
4. Not knowing rights/laws
5. Not all landlords accept vouchers- some say it flat out, others don't say it directly, but charging such high rent that voucher won't cover rent. Forced to look outside the City for cheaper rent.
6. Discrimination
7. Condo Conversion
8. Lack of program flexibility
9. Credit requirements
10. Extra screening- brokers
11. EAEDC, TAFDC, SSDI, & SSI have not kept up with cost of living

Proposed solutions:

1. Financial incentives for landlords to rent to Section 8 tenants or keep Section 8-assisted tenants
2. Month holding fee during inspection of units
3. Tax abatement for Section 8 multiple year leases (or higher payment standard for multiple year leases)

4. Education of the masses, particularly landlords and property owners
5. Create database of property owners willing to rent to voucher holders (Boston's scatter site shelters)
6. Increase value of vouchers
7. Create better relationship with Housing Authority
8. City pays for brokers and educates brokers
9. Benevolent landlord tax abatement
10. Cover first, last, security deposit, and delay in leasing

Race/Ethnicity/Country of Origin

Fourteen themes were identified, in terms of issues particularly affecting non-white populations and/or immigrants.

1. Housing affordability
2. Landlord discrimination against people from certain countries, particularly at a time with so much political conflict
3. Small units don't accommodate large families
4. Many families experience homelessness
5. Discrimination related to there being lead paint in available units
6. Hard to access information for speakers of other languages (process to buy a house, renter's rights, etc.)
7. Not enough subsidized housing to accommodate families with children
8. Racial profiling
9. Most immigrants live in particular neighborhoods, particularly East Somerville, and streets including: Pearl Street, Radcliffe St., Walnut St., Cross St, Governor Winthrop Way
10. Harder for people who don't speak English to find well-paying jobs
11. People with high levels of education in their own countries can't apply it here
12. Property owners unwilling to take funds for undocumented/unaccompanied youth housing
13. Racially targeted evictions in public housing for certain lease violations
14. The city is unable to support immigrants after they gain citizenship and join the middle class

Contributing factors:

1. Lack of proper documentation (work permit, US residence, etc.)
2. Lack of respect from property owners because immigrants might not be aware of their rights
3. Expensive rental market
4. Defunding of Sanctuary Cities
5. Racial profiling
6. Discrimination against those who do not speak English as first language from landlords and management companies
7. Economic displacement
8. Segregation- POC/low-income residents living in particular areas
9. Residents don't have knowledge of laws and rights

Proposed solutions:

1. Provide more information and education in other languages

- a. Particularly about the process to access affordable housing. If you don't know what's out there, how will you know to apply?
2. Rent control
3. Increase space capacity (Zoning)
4. Opportunities for families who become homeless in Somerville to apply for subsidized housing/lottery as a priority when available
5. More unifying events spanning across communities getting businesses, local politicians, schools involved. Provide spaces for people to co-mingle/begin to understand one another
6. All resources and applications should be translated into all languages spoken by all community members; community agencies and City staff should be diverse and multi-lingual to better facilitate services/engagement with residents

Publicly Assisted Housing

1. Publicly assisted housing should be more evenly spaced throughout the City. Higher concentration in East Somerville is disappointing. People should have opportunity to live in affordable housing in all parts of the City
2. Lack of public housing in the Tufts area/middle of the city- heavy population of young students.
3. Lottery system feels unfair and doesn't address specific needs

Public Transportation

1. Buses don't run enough on weekends
2. Difficult to travel North to South on public transit
3. Much more reliable in West Somerville than East Somerville
4. Not enough public transportation options
5. There should be a cab voucher program for seniors and people with disabilities

General Comments and Solutions:

General Comments (Those that could not be organized into specific topic areas)

1. Affordability
2. Waitlists for affordable housing in the City are too long; need for more affordable units
3. Confusing to navigate how to obtain affordable housing: have to apply to each opportunity with multiple housing providers. People are often on many waitlists with the SHA, VNA, City, and SCC and its hard to keep them all straight
 - a. Things change year to year, people don't know where to go to get help
4. Inclusionary zoning laws are not comprehensive enough- few can afford even inclusionary units.
5. Fear of displacement by the Green Line Extension
6. Foss Park is not accessible- people feel unsafe walking to it, mostly unused until summer when swimming pool opens
7. Broker fees make renting even more unaffordable- not covered by subsidizing agencies and difficult to cover. Added as a screening level increasing barriers for low-income families to access housing
8. Condo conversions make city less affordable

9. FRIT decision to build off-site affordable housing is segregationist initiative. Segregates the building itself and has an impact as to who will be welcome in Assembly Square
10. Too many outside investors buying properties and then renting them
11. Median Family Income is not a good indicator- it's too high
12. Speculative market
13. Economic displacement
14. Promote housing as a human right, rather than a for-profit concept
15. City needs to hold itself accountable to the assessments it does. Public presentation of this info should be given to the Mayor
16. Tufts University makes housing market very difficult- students pass homes along to others that they know, can pay more, they do screenings themselves for roommates
17. Expense of the MBTA
18. Gentrification
19. Parking requirements make 3 bedroom units impossible
20. Limits on number of family members per room
21. Luxury condos are only thing being built
22. Water and sewer bills going up. Taxes increasing for homeowners. Gets passed down to renters
23. Apartments in ill repair, not being taken care of by landlords
24. People have a lot of negative things to say about management at SHA

General Proposed Solutions

1. Prioritize budget and policies for affordable housing
2. Increase effort to create more affordable housing evenly throughout the City
3. Find opportunities to rebuild old housing in poor conditions with increased density - same footprint of building, just more dense where are adding affordable units
4. Consider reuse of buildings for affordable housing. Powderhouse School was the example the group used; are there more City-owned buildings not in use that could be reused for housing?
5. Try to communicate with the larger community in newer ways such as by using more text alerts for affordable housing opportunities, flyers in places where people frequent such as supermarkets, libraries, churches, transit stations and bus stops, schools, housing complexes etc. and in multiple languages
6. Create landlord association
7. Create tax incentive for landlords to rent below market value
8. More focus on moderate income housing- rental and ownership
9. City should stick to precedents it sets
10. Support community benefits agreements
11. Create a community land trust for affordable homeownership
12. More festivals to bring people together across race/class lines, interact with each other
13. More artist housing
14. Rent control
15. Mandatory multiple-year leases
16. Stronger fair housing commission

17. Link weatherization with affordable housing- incentivize landlords to weatherize their homes to decrease utility costs for tenants
18. Possibility of commissioner taking on cases of discrimination so tenants do not have to
19. Create an office of housing stability
20. Increase housing supply
21. More public education re: financial literacy, housing programs, etc.
22. Get rid of lottery
23. More housing options for middle-income earners
24. Inclusionary Zoning units that prioritize those at risk of displacement

IV. Assessment of Past Goals and Actions

1. *Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:*

a. Discuss what progress has been made toward their achievement.

b. Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences).

Note: Questions 1 (a) and (b) are integrally related and are therefore answered together.

The 2009 Assessment of Impediments (AI) to Fair Housing report identified a total of seven (7) goals:

1. Target marketing efforts of available affordable units toward population groups who are either linguistically isolated or unable to access the traditional means of communication.
2. Send mailings on fair housing issues to private rental owners.
3. Allocate financial resources needed for future educational campaigns.
4. Shift educational campaigns from awareness creation to empowerment.
5. Provide workshop trainings to empower the impacted populations to identify fair housing impediments and seek redress.
6. Deepen collaboration between the Fair Housing Commission and Somerville service providers and advocacy agencies, especially those who provide English classes to new immigrants.
7. Assess the housing needs for protected classes under the ADA law.

AI Goals 1&2- The three most commonly spoken languages in Somerville, besides English, are Portuguese, Spanish and Haitian Creole. As such, the City established SomerViva, a team of interpreters and translators that have been instrumental in the City's marketing and outreach efforts to these communities. When marketing materials become available for affordable units, those materials are forwarded to the SomerViva team for translation into all three languages. Marketing materials first include a flyer with details of eligibility requirements, information session dates and the application deadline. The SomerViva team is also encouraged to promote the opportunities during their outreach events and in their office.

Given the ever-rising cost of housing in Somerville, vast interest in affordable housing opportunities is to be expected; therefore, at least two information sessions are held for each new development offering affordable housing; one is held in the morning while the other is held in the late afternoon. The SomerViva Interpreters attend both information sessions and help applicants fill out applications in their language, if necessary. Moreover, the City recently hired a social worker, who works closely with the Housing Division to provide interpretation and translation services in Portuguese and Spanish, in addition to assisting residents who are elderly, have disabilities, or generally need extra assistance with navigating affordable housing challenges and opportunities. Housing Division staff are also available during the 60-day marketing period to hold individual information sessions with walk-ins or over the phone for those with limited time or who cannot make it to the scheduled events. In 2016, the City hired a multi-lingual Inclusionary Housing Specialist to further ensure marketing efforts are targeted toward linguistically isolated communities.

Developers of housing subject to the City's Inclusionary Ordinance sign an Affordable Housing Implementation Plan (AHIP) which includes an affirmative marketing plan describing the requirement to advertise in at least one local newspaper and one minority newspaper. When flyers are sent out to the Inclusionary Housing Listserv, translations of those flyers into Portuguese, Spanish and Haitian Creole are also sent. Additionally, the flyers advertising affordable housing opportunities through the City's Inclusionary Program are made available in all languages on the City's website and social media platforms.

Moreover, the City advertises inclusionary housing opportunities on the following websites that residents searching for affordable and/or accessible units in the Greater Boston Region regularly visit:

MassAccess (<http://www.massaccesshousingregistry.org/>)

Mass Affordable Homes (www.massaffordablehomes.org)

Metrolist (<https://www.boston.gov/metrolist/lottery-and-resale>)

Metropolitan Boston Housing Partnership (<http://mbhp.org/?property=apartment-listings>)

AI Goal 1-2- Efforts related to goals 1 and 2 identified above also include large scale mailings to Somerville residents publicizing the City's Lead Abatement Program (<https://www.somervillema.gov/departments/programs/lead-abatement-program>). This has encompassed three different campaigns since the above goals were established. During the most recent campaign in July 2017, eight thousand (8,000) postcards were mailed to residents with information on the Lead Abatement Program.

The program itself provides an incentive in the form of a forgivable loan to eligible owners to delead their properties. This program plays an important role in providing households with more choice, as ninety (90) percent of the City's housing stock was built prior to 1978. Households with children have increased housing choice in Somerville when units are delead. Since 2012 fifty-seven (57) units have been delead with funding from the federal government. One barrier the Housing Division has encountered with this program has been the HUD income limits placed at 80% AMI. If the applicant is the owner and

an occupant of a 1-4 family home or condo with a child under 6 years of age, their income must not exceed 80% AMI, currently \$62,550 for a two person household. The City's most recent Housing Needs Assessment in 2015 found that 66% of owner occupied households are above 80% AMI, thereby limiting the number of households the City can incentivize through this program.

AI Goal 3 - 5- Funds have not been allocated to carry out educational campaigns shifting from awareness creation to empowerment, as called for under this goal. However, the FHC has undertaken campaigns that can serve to empower. One such example is the annual fair housing educational campaign at local elementary schools where students discuss fair housing laws within the City. A large number of third and fifth graders participate in learning about protected classes, fair housing choice, and recognizing discrimination. Students then participate in a poster contest about fair housing issues and the winning class is rewarded with a pizza party and meets with Somerville's Mayor. Another such example is the training SHD and the FHC hosted on LGBT Awareness and HUD Policy Training on April 25, 2013 for management companies, landlords and shelter providers.

AI Goal 6- In an effort to address goal 6 (while also serving goal 4 and 5), FHC and Somerville service providers and advocates, especially those who provide English classes to new immigrants, participate in first-time homebuyer workshops hosted by the Somerville Community Corporation (SCC) and present information about fair housing and the City's housing resources. Since 2009, members have also contributed to financial literacy programs at the Welcome Project and participated in community events throughout the year. These events include the Nepali Festival and Somerville's National Night Out, an event hosted by Somerville Cares About Prevention that includes information tables, Police and Fire Department demonstrations and youth activities. Additionally, the FHC maintains a Facebook page where members post fair housing questions and answers weekly. Members also post relevant news articles to remind readers of their fair housing rights and create awareness of fair housing issues. In one recent example, a member shared an article titled, "Protecting Yourself as a Home Renter" that outlined tenant rights, including examples of illegal housing practices and what tenants can do about them. Posts with information on income restricted units available through the City's Inclusionary Housing Program are also shared on this platform.

FHC capacity has been limited by its volunteer status and its lack of funding. These limitations have impeded its ability to take more action in addressing fair housing issues. The impact of these limitations is evidenced by an apparent drop in fair housing awareness: in the 2009 AI a decline in fair housing awareness was reported. The report stated that residents were aware of their fair housing rights and knew how to report fair housing issues (although it is not clear how housing awareness was measured). By contrast, the most recent WINS Survey found that fifty-nine (59) percent of households were not aware of fair housing organizations who work to enforce fair housing laws in Somerville, and sixty-six (66) percent of households who participated in the survey did not know how to report a fair housing problem. Furthermore, the City experienced a 3.7% population increase from 2000-2015 adding another barrier. Although these limitations are a significant barrier, the FHC has had an impact and will continue to work to increase that impact.

AI Goal 7- At this time no action has been taken to reach goal #7. The City's former ADA Coordinator left her position shortly before the drafting of this assessment. However, as the new ADA Coordinator becomes adjusted, the needs of those protected under the ADA will be further addressed.

c. Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced.

The Housing Division has found that many residents do not know how to report fair housing violations. Information on how to report violations and whom to report them to can be clearly stated on the City's website to ensure that the information is easily accessible. City staff may also move to work more closely with organizations that have been awarded funding to combat housing discrimination in the region. Organizations identified during AFH preparation that receive such funds include: the Fair Housing Center of Greater Boston, Suffolk University Law Education and Outreach Initiative, and Suffolk University Law Private Enforcement Initiative. The Housing Division, Health and Human Services Department, the City's Manager of Diversity, Equity and Inclusion Services, SomerViva and relevant City commissions can also work together to assess housing needs for protected classes. Stronger collaboration amongst City departments, commissions, residents, and organizations throughout the City and region is necessary in order to address fair housing issues.

To ensure that information is up to date and residents are aware of their rights, the City and Fair Housing Commission (FHC) can run an annual campaign. The majority of leases end on August 31st in Somerville and the Greater Boston Metro region; therefore, the campaign should run from April (National Fair Housing Month), until at least the end of August. This time frame would help ensure prospective tenants are aware of their rights while searching for a unit. The FHC, Somerville Housing Division (SHD), SomerViva and local community organizations can partner to ensure flyers are placed throughout the City in multiple languages. Information can also be placed on the City website and social media platforms. Creating an annual marketing campaign can help ensure that new residents are informed of their fair housing rights and that current residents are reminded of them. This would also be an opportune time to update reporting information to minimize barriers, and ensure complaints are being tracked and that residents are connected to the Fair Housing Center of Greater Boston (<http://www.bostonfairhousing.org/Contact-Us.html>).

d. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.

After submitting the 2009 Analysis of Impediments (AI) to Fair Housing to HUD, a working group was assembled for four months (late 2011-early 2012) to advise the Housing Division on the development and implementation plan for the report. The goals of the working group were numerous, and included the following: to analyze and revise the report, create action steps to achieve broader goals, identify which populations were the most vulnerable to each impediment, identify organizations to engage with in mitigating impediments and to establish a timeframe for the completion and documentation of the action steps. The working group consisted of representatives from eleven community entities including: Community Action Agency of Somerville (CAAS), the Fair Housing Center of Greater Boston, Office of Commissions, City's Inspectional Services Department, Health and Human Services Department, Council

on Aging, Somerville Homeless Coalition, the Haitian Coalition, Housing Division and the Cambridge Health Alliance. The outcome of six working group meetings over the four month period was an eighteen page document titled, “Implementation Plan for the 2009 Somerville Analysis of Impediments to Fair Housing, A Report on the Work of the AI Working Group”; the report outlined ninety six (96) action steps with assigned lead and supportive agencies under the themes of capacity and resources, awareness creation, education and training, programming, studies, incentives and support, advocacy and policy change.

In developing current goals, SHD staff analyzed fair housing issues, considered public comments from residents, community agencies and other City Departments on fair housing issues and possible solutions, and reviewed the action steps described in the aforementioned implementation plan. Generally, the same issues and solutions persist from the 2009 AI to the completion of the implementation plan in 2012 to present day. Consequently, it was decided to include a number of the action steps as goals and priorities in this AFH (after consulting with the FHC and other City Departments to ensure they are not just warranted, but also feasible). Action steps that were not included in the AFH were left out because they were unfeasible or because they were not within the purview of the City’s Housing Division, City, nor existing community organizations.

As an example, it was decided that the following action step should not be pursued: exploring the possibility of finding volunteers and interns, preferably with a legal background, to investigate fair housing cases and also to provide training to service providers in the City. Staff concluded this action step was not worth retaining, as fair housing entities whose responsibility it is to resolve cases already exist; it would not be a good use of the City or FHC’s limited time and resources. Instead, the SHD and FHC worked to address more immediate goals such as seeking additional funding resources for fair housing programs and exploring the revision of FHC membership requirements.

V. Fair Housing Analysis

A. Demographic Summary

1. Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).

Table 1 - Demographics						
	(Somerville, MA CDBG, HOME, ESG) Jurisdiction			(Boston-Cambridge-Newton, MA-NH CBSA) Region		
Race/Ethnicity		#	%		#	%
White, Non-Hispanic		52,359	69.12		3,408,584	74.87
Black, Non-Hispanic		4,869	6.43		301,533	6.62

Hispanic		8,017	10.58		410,516	9.02
Asian or Pacific Islander, Non-Hispanic		6,594	8.70		293,833	6.45
Native American, Non-Hispanic		90	0.12		6,347	0.14
Other, Non-Hispanic		1,689	2.23		46,960	1.03
National Origin	Country	#	%	Country	#	%
#1 country of origin	Brazil	2,945	3.89	Dominican Republic	62,800	1.38
#2 country of origin	India	1,560	2.06	China excl. Hong Kong & Taiwan	61,975	1.36
#3 country of origin	Portugal	1,547	2.04	Brazil	49,283	1.08
#4 country of origin	China excl. Hong Kong & Taiwan	1,331	1.76	India	42,875	0.94
#5 country of origin	El Salvador	1,273	1.68	Haiti	42,476	0.93
#6 country of origin	Haiti	964	1.27	El Salvador	28,388	0.62
#7 country of origin	Nepal	774	1.02	Vietnam	27,092	0.60
#8 country of origin	Italy	585	0.77	Guatemala	22,352	0.49
#9 country of origin	Guatemala	549	0.72	Canada	22,302	0.49
#10 country of origin	Canada	390	0.51	Cape Verde	18,651	0.41
Limited English Proficiency (LEP) Language	Language	#	%	Language	#	%
#1 LEP Language	Portuguese	2,852	3.92	Spanish	151,176	3.32
#2 LEP Language	Spanish	2,564	3.52	Chinese	51,325	1.13

#3 LEP Language	Chinese	817	1.12	Portuguese	48,622	1.07
#4 LEP Language	Other Indic Language	659	0.90	French Creole	26,271	0.58
#5 LEP Language	French Creole	438	0.60	Vietnamese	18,720	0.41
#6 LEP Language	Italian	298	0.41	Russian	12,695	0.28
#7 LEP Language	Other Asian Language	173	0.24	Arabic	9,967	0.22
#8 LEP Language	Vietnamese	167	0.23	Cambodian	9,558	0.21
#9 LEP Language	Arabic	154	0.21	French	8,788	0.19
#10 LEP Language	Greek	143	0.20	Italian	8,613	0.19
Disability Type		#	%		#	%
Hearing difficulty		1,736	2.39		131,238	3.06
Vision difficulty		1,213	1.67		77,542	1.81
Cognitive difficulty		2,295	3.16		183,469	4.27
Ambulatory difficulty		3,074	4.23		231,880	5.40
Self-care difficulty		1,331	1.83		88,850	2.07
Independent living difficulty		2,550	3.51		168,656	3.93
Sex		#	%		#	%
Male		37,158	49.05		2,202,868	48.39
Female		38,596	50.95		2,349,534	51.61
Age		#	%		#	%

Under 18		9,134	12.06		983,268	21.60
18-64		59,711	78.82		2,973,091	65.31
65+		6,909	9.12		596,043	13.09
Family Type		#	%		#	%
Families with children		5,069	37.82		501,830	45.55

Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families.

Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.

Note 3: Data Sources: Decennial Census; ACS

Table 2 - Demographic Trends												
	(Somerville, MA CDBG, HOME, ESG) Jurisdiction						(Boston-Cambridge-Newton, MA-NH CBSA) Region					
	1990		2000		2010		1990		2000		2010	
Race/Ethnicity	#	%	#	%	#	%	#	%	#	%	#	%
White, Non-Hispanic	64,287	84.33	56,349	72.68	52,359	69.12	3,589,171	86.83	3,544,912	80.72	3,408,584	74.87
Black, Non-Hispanic	3,977	5.22	5,846	7.54	4,869	6.43	215,401	5.21	279,328	6.36	301,533	6.62
Hispanic	4,768	6.25	6,774	8.74	8,017	10.58	189,345	4.58	281,256	6.40	410,516	9.02
Asian or	2,786	3.65	5,500	7.09	6,594	8.70	116,922	2.83	219,564	5.00	293,833	6.45

Pacific Islander, Non-Hispanic												
Native American, Non-Hispanic	96	0.13	295	0.38	90	0.12	5,815	0.14	14,547	0.33	6,347	0.14
National Origin												
Foreign-born	16,981	22.28	22,725	29.32	19,281	25.45	427,497	10.34	602,072	13.71	771,071	16.94
LEP												
Limited English Proficiency	8,925	11.71	12,439	16.05	9,254	12.22	233,541	5.65	327,367	7.45	402,577	8.84
Sex												
Male	36,295	47.62	37,669	48.59	37,158	49.05	1,987,545	48.09	2,119,857	48.27	2,202,868	48.39
Female	39,925	52.38	39,850	51.41	38,596	50.95	2,145,517	51.91	2,271,476	51.73	2,349,534	51.61
Age												
Under 18	11,635	15.26	11,663	15.05	9,134	12.06	909,015	21.99	1,055,372	24.03	983,268	21.60
18-64	55,261	72.50	57,791	74.55	59,711	78.82	2,703,316	65.41	2,782,481	63.36	2,973,091	65.31
65+	9,325	12.23	8,066	10.41	6,909	9.12	520,730	12.60	553,479	12.60	596,043	13.09
Family Type												
Families with children	6,065	37.68	3,508	37.91	5,069	37.82	457,120	44.32	288,783	48.32	501,830	45.55
Note 1: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.												

Note 2: Data Sources: Decennial Census; ACS

Table A.1: Somerville's Population (US Census Bureau)				
1990	2000	2010	2015	Percentage Change (1990-2015)
76,210	77,478	75,754	78,595	3.12% (Increase)

According to the US Census data listed in Table A.1 above, Somerville's population has stayed fairly stable over the past twenty-five years. The city experienced a slight decrease in population from 2000 to 2010, but increased to a level over the 1990 population from 2010 to 2015. The largest population increase in the past twenty five years has taken place from 2010-2015, with a percentage increase of over 3.7%.

Racial/Ethnic Populations

Somerville is a majority White jurisdiction. However, as information available in HUD Table 2 in Appendix B shows, the number and percentage of White residents declined considerably between 1990 and 2010 (nearly a 16% decrease of almost 10,000 residents). Black, Hispanic, and Asian/Pacific Islander populations increased 1.21%, 4.33%, and 5.05% respectively. The Native American population in Somerville in 2010 is similar to what it was in 1990, however in 2000 there was about a 200% increase.

National Origin Populations/ LEP

According to HUD Table 1 in Appendix B, the primary country of origin in Somerville among residents from countries other than the U.S. is Brazil, with 2,945 residents making up 3.89% of the population. The second highest number of residents from outside the U.S. are from India, with 1,560 residents making up just over 2% of the population, followed by Portugal with 1,547 residents comprising just over 2% of Somerville's population. The number of foreign born residents increased between 1990 and 2000 from 16,981 (22.28% of the population) to 22,275 (29.32% of the population), an increase of 7.04%. From 2000- 2010, the foreign-born population decreased from 22,725 to 19,281 residents, representing a 3.87% decline to 25.45% of total Somerville population.

The percentage of foreign born residents in Somerville is significantly higher than in the region, which averaged roughly 13% between 1990 and 2010, and was 16.9% in 2010. This difference between Somerville's percentage of foreign-born residents compared to the region-of-comparison has been

decreasing. The percentage of foreign-born residents in the region has been steadily increasing, while the comparative population decreased between 2000 and 2010.

Somerville remains one of the most racially diverse jurisdictions in the region; however, the countries of origin among the City's population differs somewhat from the broader region. The top three countries of origin in the region are the Dominican Republic at 1.38% of the population, China at 1.36%, and Brazil at 1.08%; India follows as the fourth country of origin. Portugal -- the third most popular country of origin in Somerville, does not make the top ten list in the region.

Limited-English Proficiency (LEP) residents made up 11.71% of the population of Somerville in 1990, 16.05% in 2000, and 12.22% in 2010. The population of LEP residents was 16,981 in 1990, 22,725 in 2000, and 19,281 in 2010. These statistics reflect increases in foreign born populations captured in the 2000 Census. The top three languages represented in these populations are Portuguese at 3.92%, Spanish at 3.52%, and Chinese at 1.12%. By comparison, as of 2010, the most-represented languages among the region's LEP population were Spanish at 3.32%, Chinese at 1.13%, and Portuguese at 1.07%.

Individuals with Disabilities

Ambulatory Difficulty was the the most common disability among Somerville residents as of 2010, at 4.23% of the population or 3,074 residents. Independent Living Difficulty was the next most common disability at 3.51% or 2,550 residents, followed by Cognitive Disability at 3.16% (2,295 residents). In the (Boston-Cambridge-Newton, MA-NH CBSA) region, the same three disabilities are the most frequently reported, with Ambulatory Difficulty at 5.4%, Cognitive Disability at 4.27%, and Independent Living Difficulty at 3.93%.

Families with Children

Families with children have comprised a somewhat smaller percentage of the population of Somerville than they have in the region-of-comparison, according to available census data. Five thousand and sixty nine (5,069) families in Somerville reported having children (37.82% of total families). Roughly 46% of total families in the region reported having children. The percentage of families with children in Somerville has remained essentially level since 1990.

B. General Issues

i. Segregation/Integration

1. Analysis

a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.

The following assessments were made in reference to HUD Table 3 in Appendix B which provides a “dissimilarity index” that assigns values between 0 to 39 to indicate low segregation, values between 40 to 54 to indicate moderate segregation, and values between 55 to 100 to indicate high segregation.

Table 3- Racial/Ethnic Dissimilarity Trends			
	(Somerville, MA CDBG, HOME, ESG) Jurisdiction		
Racial/Ethnic Dissimilarity Index	1990	2000	2010
Non-White/White	17.06	20.76	31.48
Black/White	21.25	25.49	37.79
Hispanic/White	22.49	34.09	44.29
Asian or Pacific Islander/White	14.64	14.40	21.03

	(Boston-Cambridge-Newton, MA-NH CBSA) Region		
Racial/Ethnic Dissimilarity Index	1990	2000	2010
Non-White/White	55.80	53.90	53.49
Black/White	68.56	66.00	66.41
Hispanic/White	59.38	62.55	61.40
Asian or Pacific Islander/White	45.55	46.10	47.78

HUD Table 3 in Appendix B indicates that Somerville residents experience low levels of segregation in comparison to the region. Of the three census periods studied, only one racial/ethnic population is shown to experience a moderate level of segregation. The Hispanic/White Dissimilarity Index showed 44.29 points in 2010, within the 40-54 range to indicate moderate segregation. Segregation in regards to this population has been increasing since 1990.

The second most segregated population is the Black population with a Dissimilarity Index of 37.79, within the low segregation scale. It is worth noting that, because the index only measures two groups at a time, it may be a less reliable measure of segregation in Somerville, a city with multiple demographic groups scattered throughout the city. Comparatively, the region experiences higher levels of segregation

than Somerville, with all populations except Asian or Pacific Islanders facing high levels of segregation and Asian or Pacific Islanders experiencing moderate levels through 2010.

b. Identify areas in the jurisdiction and region with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.

According to HUD Map 1 in Appendix A, Somerville is relatively integrated racially, with some minority population clusters. The areas that have comparatively more racial diversity include East Somerville, the northern part of Winter Hill close to the Mystic River public housing development, the neighborhood including Clarendon Hill Towers west of Teele Square, and Union Square. While higher populations of Black, Hispanic, Native American, and Asian/Pacific Islander populations live in these areas, substantial numbers of White residents live in these neighborhoods as well. There are also Non-White residents who live outside of these “clusters.”

Some patterns emerge when looking at HUD Map 3 in Appendix A, which documents the location of people of varying national origins. A population of individuals born in China is clustered in the Spring Hill neighborhood. Brazilian residents tend to live in Winter Hill, Prospect Hill, and East Somerville. The Portuguese community is represented in those same neighborhoods as well as the area surrounding Lincoln Park, south of Union Square. These same areas are populated by many residents originally from El Salvador. Residents originating from India tend to be scattered throughout the City.

According to HUD Map 4 in Appendix A, many of Somerville’s Spanish and Portuguese speakers live in Winter Hill, Prospect Hill, and East Somerville, consistent with patterns suggested in HUD Table 3. Chinese speakers are somewhat clustered in Spring Hill and East Somerville, and Haitian Creole speakers tend to live in Mystic and Clarendon Hill.

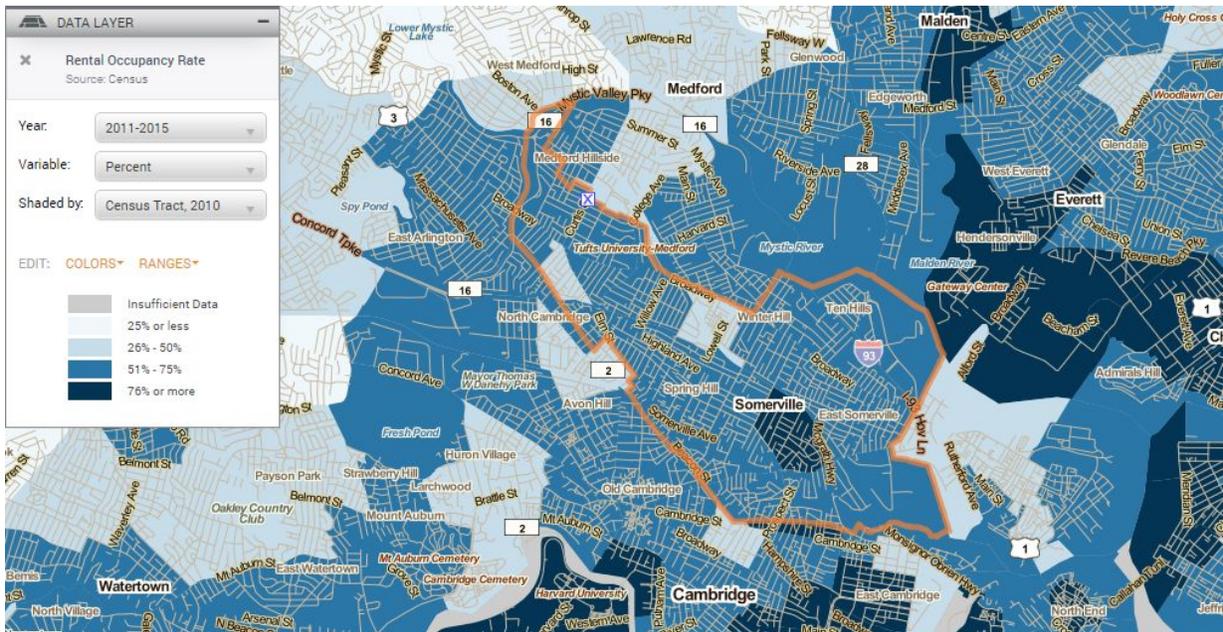
Compared to other jurisdictions in the region, including Boston, Somerville has relatively little segregation.

c. Explain how these segregation levels and patterns in the jurisdiction and region have changed over time (since 1990).

Regionally, levels of segregation between Black and White populations have decreased slightly since 1990, but increased among Hispanic and Asian or Pacific Islander populations. No shifts of greater than 3 percentage points have occurred between the 1990 and 2010 censuses. In Somerville, however, each population has experienced growing segregation since 1990. Overall segregation between White and Non-White populations increased by 14.42 points from 1990 to 2010. Segregation levels have almost doubled for Black and Hispanic populations, and increased by about 7 points for Asian or Pacific Islander populations between 1990 and 2010. The number of racial and ethnic minorities in Somerville has steadily increased since the 1990’s, and ethnic minorities tend to have experienced increased segregation as their populations have grown.

d. Consider and describe the location of owner and renter occupied housing in the jurisdiction and region in determining whether such housing is located in segregated or integrated areas, and describe trends over time.

As is clear in the *Rental Occupancy Rate in Somerville, 2015* map, Somerville has a very large percentage of renters. While Prospect Hill has a particularly high percentage of renters, there does not seem to be any segregation in terms of renter and owner occupied housing in the jurisdiction. Generally, those areas within the region that are closest to the Boston Metropolitan Area are more likely to have higher rates of rentership rather than homeownership.



Rental Occupancy Rate in Somerville, 2015. Source: Policy Map, U.S. Census.

e. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future. Participants should focus on patterns that affect the jurisdiction and region rather than creating an inventory of local laws, policies, or practices.

If the trend toward increased segregation in the region continues, this could lead to higher segregation in the jurisdiction in the future. This issue is most relevant for Hispanic populations that have seen the highest increase in segregation patterns in the City. It is important to note that part of this dynamic may be attributed to the fact that Somerville has a history of being welcoming to immigrants, which may result in immigrants coming to specific neighborhoods where other immigrants from their home country may already be living.

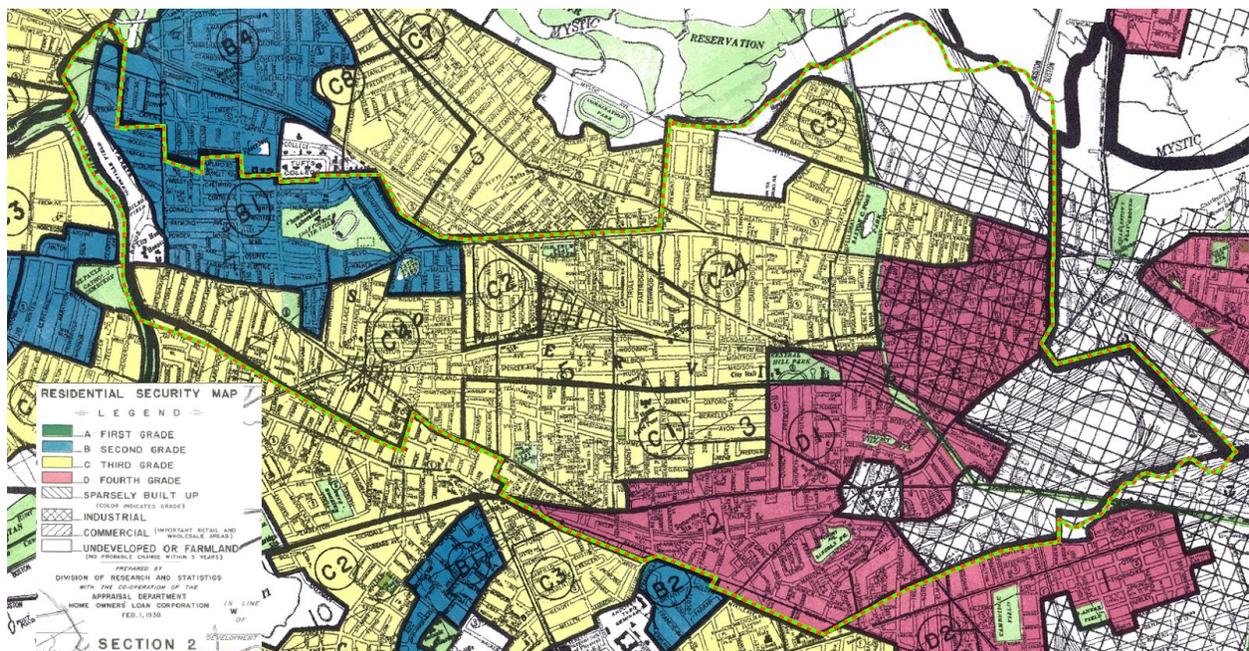
Some residents expressed fear that development associated with the extension of the MBTA Green Line rail system will lead to continued increases in housing prices and the displacement of current residents. Such price increases could lead to particular populations being unable to access housing, especially in areas close to public transportation that tend to be in notably high demand. City policy-makers share similar concerns, and are working to create and preserve housing as a means of mitigating this issue. The

City has already increased requirements for new affordable housing to be provided under the City’s Inclusionary Zoning Ordinance to stimulate creation of affordable units specifically. The ordinance was revised in 2016 to require up to 20% affordable units for projects permitted after May 9, 2016; an increase from the previous 12.5% requirement.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.

Due to decades of discriminatory practices and policies such as redlining, steering, and inequitable distribution of resources throughout the region, opportunity in Somerville is not a given for everyone. The history of segregation to which Somerville is not immune undoubtedly still plays a role in the City. Below is an Home Owners Loan Corporation (HOLC) Residential Security Map outlining “dangerous” investment areas in the City from 1938. The areas in red were considered “fourth grade”(the lowest of four levels), and banks were unlikely to give loans to residents of those neighborhoods, due to their racial composition. A map depicting the percentages of non-White individuals is provided for comparison to show that many of the patterns established in 1938 still exist today.



(HOLC Residential Security Map, 1937.)



Percent Non-White Population in Somerville, 2015. Source: Policy Map, Census

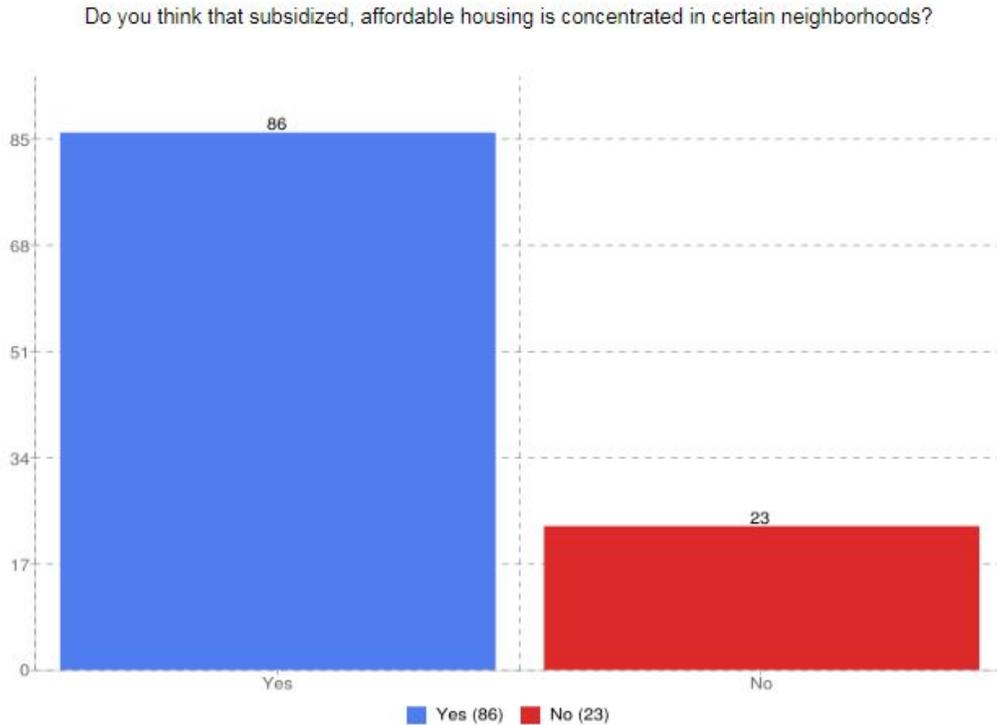
While the data provided by HUD does not suggest high levels of segregation in Somerville, residents responding to the WINS Survey reported that low-income residents and people of color tend to live in the East Somerville and Winter Hill areas, and that the neighborhoods surrounding Tufts University tend to be populated by mostly white residents. When answering an open ended question concerning factors contributing to segregation in Somerville, 31 of 45 respondents referenced economic segregation. Residents clearly reported that income is an important indicator when trying to understand racial segregation in the City.

Many residents also reported that economic segregation also seems to exist on a more regional scale. Those who cannot afford to live in Somerville move to surrounding communities that are somewhat less expensive.

It should be noted that economic displacement and segregation inherently impact certain races and ethnicities more than others. For example, because residents with LEP have fewer employment opportunities, those residents will be more directly impacted by rising rental costs than those who speak fluent English. Economic segregation is inherently tied to racial, ethnic, and other forms of segregation.

According to the data collected in the WINS Survey and detailed below, most residents also believe that subsidized affordable housing is concentrated in certain neighborhoods, as shown in the chart below.

(Graph 1)



b. The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and geographic mobility options for protected class groups.

3. Contributing Factors of Segregation

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.

- **Displacement of residents due to economic pressures/revitalization efforts:** Residents clearly reported that increasing rent prices were driving them to look for housing in other cities. They also noted that development, and the expectation of further investment in the Union Square area and around the Green Line Extension in Somerville has caused displacement.
- **Location and type of affordable housing:** As can be seen in the chart above, residents of Somerville believe that subsidized affordable housing is concentrated in certain neighborhoods.
- **Private discrimination:** Many residents and stakeholders reported that private discrimination, particularly in the rental market, takes place based on race, ethnicity, perceived accent, and familial status.
- **Language barriers:** Economic displacement and segregation disproportionately affect persons with limited English proficiency. During the community engagement process, residents explained

that immigrants or non-english speaking residents who move into Somerville tend to move close to their peers who speak the same language.

- **Immigration status:** During meetings with community service providers, many emphasized the difficulty of their residents to obtain housing vouchers through government-assisted programs they are not U.S. citizens.

i. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

1. Analysis

- a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction and region.*

According to the HUD provided maps, Somerville does not have any R/ECAP tracts within the City's boundaries.

- b. Describe and identify the predominant protected classes residing in R/ECAPs in the jurisdiction and region. How do these demographics of the R/ECAPs compare with the demographics of the jurisdiction and region?*

As noted above, Somerville does not have any R/ECAP tracts.

- c. Describe how R/ECAPs have changed over time in the jurisdiction and region (since 1990).*

As noted above, Somerville does not have any R/ECAP tracts.

2. Additional Information

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics.*

Several R/ECAPs do exist within the region, most of which are in the City of Boston.

- b. The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and geographic mobility options for protected class groups.*

3. Contributing Factors of R/ECAPs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.

The City of Somerville does not have any R/ECAPs.

iii. **Disparities in Access to Opportunity**

1. **Analysis**

Each section below is informed by HUD Table 12- Opportunity Indicators by Race/Ethnicity.

Table 12 - Opportunity Indicators, by Race/Ethnicity							
(Somerville, MA CDBG, HOME, ESG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Percent of Total Population							
White, Non-Hispanic	61.79	42.43	87.04	95.85	96.77	41.16	27.77
Black, Non-Hispanic	49.21	29.68	79.50	95.75	96.96	35.08	28.94
Hispanic	47.67	26.27	76.58	95.69	97.14	39.58	27.76
Asian or Pacific Islander, Non-Hispanic	58.27	36.20	83.87	95.79	96.88	39.06	27.84
Native American, Non-Hispanic	57.60	35.01	82.17	95.81	97.13	41.29	27.33
Population below federal poverty line							
White, Non-Hispanic	58.78	41.39	85.90	95.83	96.69	40.63	27.24
Black, Non-Hispanic	35.11	23.54	65.49	95.73	97.40	37.36	30.24
Hispanic	46.28	26.10	76.79	95.79	97.15	44.84	30.49
Asian or Pacific Islander, Non-Hispanic	52.26	38.56	83.94	95.78	96.48	40.24	28.25
Native American, Non-Hispanic	32.00	16.00	81.00	96.00	98.00	59.68	N/a

(Boston-Cambridge-Newton, MA-NH) Region							
Percent of Total Population							
White, Non-Hispanic	74.28	53.78	77.06	77.22	83.13	47.54	63.80
Black, Non-Hispanic	43.66	31.23	48.18	90.61	91.15	37.82	49.43
Hispanic	41.62	34.78	49.50	90.72	91.58	50.65	47.04
Asian or Pacific Islander, Non-Hispanic	62.87	49.64	72.29	87.05	89.18	41.22	53.01
Native American, Non-Hispanic	59.20	40.69	62.51	81.45	86.00	44.96	60.36
Population below federal poverty line							
White, Non-Hispanic	61.99	49.86	70.00	83.67	87.28	46.70	56.60
Black, Non-Hispanic	31.27	26.93	41.28	93.21	93.66	37.51	43.45
Hispanic	30.12	31.58	41.38	93.05	93.29	53.71	42.86
Asian or Pacific Islander, Non-Hispanic	45.66	41.77	61.75	92.26	93.57	44.32	42.30
Native American, Non-Hispanic	39.21	39.89	62.23	90.80	93.13	45.43	45.99
Note 1: Data Sources: Decennial Census (2009, 2010); ACS; Great Schools (2012); Common Core of Data (2012); SABINS (2012); LAI (2008-2012); LEHD (2013); NATA (2005).							

a. Education

i. For the protected class groups HUD has provided data, describe any disparities in access to proficient schools in the jurisdiction and region.

The School Proficiency Index (SPI) used in HUD Table 12 found in Appendix B employs school-level data on the performance of 4th grade students on state exams in to identify neighborhoods that have

high-performing elementary schools nearby, and which are near lower performing elementary schools, as measured solely using the 2012 SPI value identified in this chart. Values are percentile ranked and range from 0 to 100. The higher the score, the higher the school system quality. Somerville's primary schools are typically K-8.

The schools in Somerville rank lower on the SPI than those in the region. Those with the lowest access to schools with higher SPI values are the Hispanic population and the Black population at 19.14 and 21.91 respectively. However, Native American populations below the federal poverty line have a SPI rating of only 13.26.

Within the region, Black and Hispanic students have the lowest scores at 28.87 and 31.98, compared to White students who have a score of 55.77. Those populations below the federal poverty line have lower scores than the total population, with Black populations at 23.62 and Hispanic populations at 27.10.

ii. For the protected class groups HUD has provided data, describe how the disparities in access to proficient schools relate to residential living patterns in the jurisdiction and region.

As illustrated in HUD Map 7 in Appendix A, neighborhoods with more racial diversity tend to have less access to schools with higher proficiency ratings than those that have less racial diversity. For example, East Somerville generally has a lower SPI, and is home to a relatively large population of Black, Hispanic, and Asian residents. Similar patterns exist in the version of the map that provides information on residents from different countries of origin. The East Somerville, Winter Hill, and Union Square neighborhoods tend to have significantly higher populations of individuals from Brazil, India, China, Portugal, and El Salvador compared to other parts of the City. These neighborhoods also appear to have more children in them than the neighborhoods with higher performing schools.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss programs, policies, or funding mechanisms that affect disparities in access to proficient schools.

The Somerville Public School System uses a controlled choice student assignment plan to place students. Controlled choice means parents/guardians have the option of registering their student in any school in Somerville by choosing their top five potential placements when they register their child for school. Every effort is made to assign students to one of their chosen schools, taking into account factors like the current enrollment of the school, class sizes, their need for special education or English language learner services, and whether or not they have a sibling in the school.

The Somerville Public School system is not required to provide transportation to students because of the small size of the City, just 4.4 square miles, and therefore does not have a school bus system for students without any kind of special need. Most choose their neighborhood school as their first choice because of the convenience of not having to drive their child across town or having to use public transportation to get to school.

However, they may also choose the closest schools because they want their child to go to a school close to where they live or because the population of the school often reflects the population of their neighborhood, which can be more attractive to densely populated immigrant populations. However, the lack of a bus system may have an impact on how equitable the school system is, even with the school choice program in place. Buses are provided for those who attend specific schools due to special needs or those enrolled in a sheltered English immersion program. In an effort to increase equity the City is now working on programs that will provide after school transportation, allowing more equitable access to all Somerville afterschool programs. There is a pilot program, Language Builders Club, that will be providing after school bussing for 2nd grade ELL students and a shuttle bus program which will shuttle middle school students between schools, allowing any student to attend any after school program at any school.

a. Employment

i. For the protected class groups HUD has provided data, describe any disparities in access to jobs and labor markets by protected class groups in the jurisdiction and region.

The Labor Market Engagement Index measures unemployment rate, labor-force participation rate, and percentage of the population ages 25 and above with at least a bachelor's degree, by neighborhood. The higher the score, the higher the labor force participation and human capital in the neighborhood is. The Jobs Proximity Index measures the physical distance between a resident's place of residence and jobs, by race/ethnicity. The higher the value, the better the access to employment opportunities for residents in the neighborhood.

White residents in Somerville have the best access to the labor market with a Labor Market Index (LMI) score of 87.04 followed by Asian or Pacific Islanders (83.87), Native Americans (82.17), Black residents (79.5) and finally Hispanic residents (76.58).

Black residents in Somerville experience greater disparities in access to the labor market if they are living below the Federal Poverty Line; the score for residents in such a circumstance in the Labor Market Index is 69.49. Residents of other races who are living below the poverty line experience slight or no change in their LMI scores compared to the general population.

All of the LMI scores in Somerville are significantly higher than those in the region in general.

The Jobs Proximity Index measures the accessibility of a given residential neighborhood to employment opportunities. The higher the index value, the better the access to employment opportunities for residents in a neighborhood. The Jobs Proximity Index shows Hispanic residents in Somerville with the highest score (44.18) and Black residents with the lowest score (38.16). Regionally, White residents score highest in the Jobs Proximity Index (48.75) and Asian or Pacific Islander residents score the lowest (42.29). For those living below the federal poverty line in Somerville, Asian or Pacific Islander residents score the lowest (37.67) and Native American residents score the highest (59.46). Looking below the poverty line regionally, White residents score the highest (49.29) and Hispanic residents score the lowest (41.43).

ii. For the protected class groups HUD has provided data, describe how disparities in access to employment relate to residential living patterns in the jurisdiction and region.

According to the HUD mapping tool, neighborhoods that have less proximity to jobs tend to be in East Somerville and West Somerville. These areas represent the neighborhoods in which the two largest public housing developments are located: Clarendon Hill Towers and Mystic Housing. These areas also tend to be the most racially and ethnically diverse in Somerville. According to the Labor Market Index, the labor market is least strong in East Somerville. However, Somerville's small size and the relative ease of traveling from East to West via public transportation makes access to job opportunities fairly equitable.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to employment.

A recent study by the Federal Reserve Bank of Boston noted that over 80% of Somerville residents with jobs do not work in Somerville. Instead, nearly 30% commute to Boston, and just over 20% work in Cambridge¹. There simply are far fewer jobs than residents in Somerville. A July 2017 draft of the Community Action Agency of Somerville's 2018-2020 Community Assessment Report and Strategic Plan (CARSP), shows that underemployment is a major challenge for low-income Somerville residents and that many are unemployed or underemployed because they need education or training². Particularly, those who do not speak fluent English have had trouble finding jobs, as reported during community engagement efforts.

b. Transportation

i. For the protected class groups HUD has provided data, describe any disparities in access to transportation related to costs and access to public transit in the jurisdiction and region.

According to the HUD-provided data in HUD Table 12 in Appendix B, Somerville residents all have excellent access to transit options and a high number of low-income families in each neighborhood use public transportation. This is depicted by the high values for each index, which never go below 95 regardless of race and whether or not a population lives below the federal poverty guide. With the completion of the GLX, 85% of the City's residents will be within a walkable distance from mass transit. A walkable distance is considered to be ½ a mile. According to the MBTA, about 75,300 people live within ½ a mile of all proposed GLX stops and 26% of those residents do not have access to a car. Notwithstanding, Somerville consistently tops the lists of the "Most Walkable" and "Most Bikeable" cities in the U.S.

¹The Federal Reserve Bank of Boston, "Working Cities Challenge: Somerville," Accessed July 7, 2017. <https://www.bostonfed.org/workingcities/massachusetts/round1/cities/somerville>

² Community Action Agency Somerville, *2018-2020 Community Assessment Report and Strategic Plan DRAFT*. Accessed July 2017.

ii. For the protected class groups HUD has provided data, describe how disparities in access to transportation related to residential living patterns in the jurisdiction and region.

The HUD-provided maps showcase that every neighborhood in Somerville receives at least a 95 on the Transit Trips Index and Low Transportation Cost Index. No variation can be seen within the jurisdiction. While the region has some disparities in its access to transportation, Somerville has very similar transportation index scores as its surrounding communities in the Boston Metro Area.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to transportation.

As was discussed by many residents and community organizations and despite HUD provided data, Somerville's transportation system lacks transit lines that run from north to south. Those residents who need to get from the Winter Hill neighborhood to Cambridge, for example, must take a bus east to catch another bus south.

The extension of the MBTA Green Line, projected to be completed in 2021, will provide rail service to Union Square, Gilman Square, Magoun Square, and Ball Square. This extension will provide access to the regional subway system that was otherwise a bus ride away from these neighborhoods. However, the rail line will still largely run east to west, and there is additional concern that development surrounding these railway stations will cause further increases in housing prices and continue to keep low-income families far away from reliable transportation.

c. Access to Low Poverty Neighborhoods

i. For the protected class groups HUD has provided data, describe any disparities in access to low poverty neighborhoods in the jurisdiction and region.

HUD Table 12 illustrates that within the total population of the City of Somerville, the Hispanic population has the highest exposure to poverty, followed closely by the Black population. The White population has the least exposure to poverty with a score of 61.79 (the higher the score, the lower the exposure to poverty), followed by Asian or Pacific Islanders and Native Americans.

The racial/ethnic population below the federal poverty with the highest exposure to poverty is Native American with a score of 32.00, followed closely by the Black population at 35.11. As with the total population of Somerville residents, the White population living below the poverty level has the least exposure to poverty followed by Asian or Pacific Islanders and Hispanics.

The protected classes identified as having the highest exposure to poverty in Somerville are also the same protected classes that show up in regional data. The Black and Hispanic populations are the most exposed to poverty within the total population and below the federal poverty line, and White residents are the least exposed, followed by Asian or Pacific Islanders and Native Americans.

ii. For the protected class groups HUD has provided data, describe how disparities in access to low poverty neighborhoods relate to residential living patterns of those groups in the jurisdiction and region?

HUD Map 12 in Appendix A shows residency patterns of racial/ethnic and national origin groups and families with children. The map also shows values for the Low Poverty Index with shading at the census tract level. Darker shading in a tract indicates a lower level of poverty while lighter shading indicates a higher concentration of poverty in the area.

The map illustrates residency patterns specific to racial/ethnic groups and poverty level. Residents in Somerville with the highest exposure to poverty are primarily concentrated in the Winter Hill and East Somerville neighborhoods, where Hispanic and Black residents comprise a large portion of the population. Although adjacent neighborhoods like Union Square and Assembly Square have less exposure to poverty (between 10.1-50 on the Low Poverty Index), these areas are inaccessible from places in West Somerville where the Low Poverty Index is above 70.1, indicating relatively low exposure to poverty.

Similarly, residents living in the Teele Square/ Hillside area experience relatively high exposure to poverty despite neighboring areas like Davis Square and Tufts University, where residents experience little to no poverty. Unlike Winter Hill and East Somerville, where Hispanic and Black residents are more exposed to poverty compared to other race/ethnic groups in the area, the Teele Square/Hillside areas are predominantly populated by White residents.

The regional HUD Map 12 in Appendix A shows residency patterns specific to racial/ethnic groups and poverty level within the jurisdiction and region. Compared to Somerville, the region experiences the most exposure to poverty in areas where Black populations are the highest. These areas are further from neighborhoods where the poverty level index is higher indicating significantly low exposure to poverty.

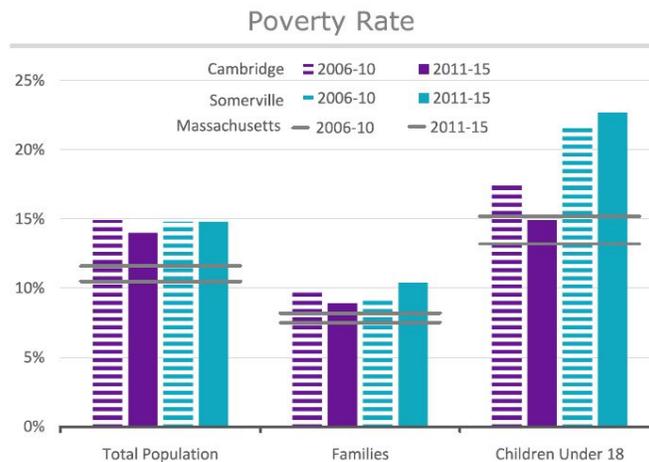
Another version of HUD Map 12 shows residency patterns specific to national origin and poverty level in Somerville. Areas where Brazilian, El Salvadorian and Indian residents live are those with the most exposure to poverty. These communities also are concentrated in areas where the low poverty index is generally below 30.1. Similarly, areas with the most ethnically diverse populations regionally also have the highest exposure to poverty.

According to HUD Map 7 in Appendix A, high percentages of households that are families with children live in neighborhoods like Winter Hill, East Somerville, Ten Hills and Hillside where the low poverty index ranges from 0-50 indicating a higher concentration of poverty.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to low poverty neighborhoods.

According to the 2017 Community Action Agency of Somerville, Inc.'s (CAAS) draft Community Assessment Report and Strategic Plan, poverty rates have increased in Somerville. Residents below the poverty level rose from 12.5% in 2000 to 14.71% between 2006 through 2015, placing Somerville's

current poverty rate over 3% higher than the statewide average. Of importance to note is also the slight increase in poverty rates among families with children in recent years as illustrated in the graph below.



Source: Community Action Agency of Somerville (CAAS) Community Assessment Report and Strategic Plan, 2017.

In the past year, two public housing developments have formed tenant organizations with CAAS’s support, to encourage public discussions related to the causes and conditions of poverty. CAAS has also partnered with the Somerville Center for Adult Learning Experiences (SCALE) and the Somerville Community Corporation’s First Source jobs program to launch a pilot program in fall 2017 that enhances SCALE’s adult continuing education, primarily for low-income and immigrants, with wraparound job support services. This new program will provide residents with access to better jobs, and potentially reduce their exposure to poverty in areas of Somerville.

d. Access to Environmentally Healthy Neighborhoods

i. For the protected class groups HUD has provided data, describe any disparities in access to environmentally healthy neighborhoods in the jurisdiction and region.

The Environmental Health Index (EHI) measures exposure based on EPA estimates of air quality carcinogenic, respiratory and neurological toxins by neighborhood. The higher the index value, the less exposure there is to toxins harmful to human health, indicating a higher level of environmental quality in that neighborhood. HUD Table 12 in Appendix B shows the environmental health index locally and regionally among different racial/ethnic groups.

Overall, Somerville has a relatively low environmental health index across all protected classes compared to regional scores, meaning that across all protected classes, exposure to carcinogenic, respiratory and neurological toxins are high in Somerville. There is little variation to the scores among each protected class inferring that the City of Somerville as a whole experiences high exposure to environmental toxins especially due to the City’s proximity to Route 93.

ii. For the protected class groups HUD has provided data, describe how disparities in access to environmentally healthy neighborhoods relate to residential living patterns in the jurisdiction and region?

HUD Map 13 in Appendix A shows residency patterns of racial/ethnic and national origin groups and families with children. The map also shows values for the Environmental Health Index (EHI) with shading at the neighborhood level indicating levels of exposure to environmental health hazards within Somerville. Lower scores on EHI are somewhat concentrated in areas where primarily Black residents live (East Somerville area) as shown in Map 13 in Appendix A, although, areas across Somerville exhibit overall high exposure to environmental health hazards.

Similar patterns in high exposure to environmental health hazards carry over to national origin and families with children in Somerville. The areas that are heavily exposed to environmental health hazards within race/ethnic groups are the same areas where diverse populations and families with children tend to reside.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to environmentally healthy neighborhoods.

Somerville has a strong industrial history with a range of operations including leadworks, glass factories and chemical storage facilities. Although the majority of these industries have declined over time, many Somerville residents currently live near or on former industrial sites. According to U.S. Environmental Protection Agency (EPA) standards, these areas qualify as brownfields. Between 1996 and 2015 Somerville received more than a dozen EPA brownfield assessment, cleanup, and revolving loan fund grants and these have had a significant impact on the number of contaminated properties.

Approximately 90% of Somerville homes were built before 1978, making it likely that homes contain lead paint, which can increase the potential of lead poisoning among young children. Since 2001, the City of Somerville's Lead Hazard Abatement Program has helped low-income homeowners and their tenants create lead safe homes.

Somerville also has advocacy groups promoting and educating residents in the importance of building and maintaining environmentally healthy communities. These groups include the Mystic View Task Force, Somerville Bike Committee, Shape-Up Somerville and Somerville Historical Commission.

e. Patterns in Disparities in Access to Opportunity

i. For the protected class groups HUD has provided data, identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors. Include how these patterns compare to patterns of segregation, integration, and R/ECAPs. Describe these patterns for the jurisdiction and region.

It is clear that all protected class groups within the jurisdiction and region face limited access to economically thriving neighborhoods and access to high performing school districts. Within Somerville, areas with the highest exposure to poverty and environmental health hazards and the least access to proficient schools and proximity to job opportunities are those that are racially/ethnically diverse.

Overall, Somerville is not an environmentally healthy city compared to the region. This could be related to Somerville's industrial history and the presence of lead-based paint in many Somerville homes. Areas where exposure to environmental health hazards are high are the same areas where predominately Black and Hispanic residents live.

In an effort to address this major concern, the City applied for and received a grant for a three phase study which was completed by the Community Assessment of Freeway Exposure and Health (CAFEH) in May of 2016 in conjunction with the Somerville Transit Equity Partnership (STEP) and SHD. The goal of this study was to influence municipal policy in order to implement policies that work to reduce exposure to pollution from the high traffic volume in Somerville. This study concluded that working with the Zoning and Health and Human Services Departments are the best ways the City can work to mitigate these pollutants, due to the lack of federal and state standards.

The City is actively working to ensure that steps are being taken to mitigate the negative health impacts of living in close proximity to major roadways. One example of such an effort is the McGrath Boulevard Project, which is a major flagship project for the City that aims to convert the McGrath Highway into a "Complete Street" which allows for comfortable use for all ages and abilities.³ This project is a major undertaking will have significant positive health and environmental impacts.

ii. Based on the opportunity indicators assessed above, identify areas that experience: (a) high access; and (b) low access across multiple indicators.

Residents in Somerville that experience access to low poverty neighborhoods, proficient schools, close proximity to job and environmentally healthy communities are more likely to be White. Residents that are exposed to adverse community factors including high poverty neighborhoods, low proficiency schools, limited access to employment opportunities and environmentally unhealthy neighborhoods are more likely to be Black and Hispanic.

2. Additional Information

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.*

Responses from Somerville residents in the Community Survey indicate that there is a lack of well-paying jobs for low-skilled workers, especially among those who are non-Native English speakers. This also includes residents with high levels of skill and education in their native countries, who have difficulty

³ McGrath Boulevard Project Development
<http://www.massdot.state.ma.us/highway/HighlightedProjects/McGrathBoulevardProject.aspx>

gaining employment that fully reflects the skill and education levels they had attained.

- b. *The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).*

Although the HUD provided data in Table 12 indicates that schools in Somerville rank lower on the School Proficiency Index than those in the region, initiatives like the Somerville School Quality Framework (SQF) are being taken to redefine the way schools traditionally measure student learning and school quality.

SQF was developed in 2014 to measure school quality more holistically. Scholars from the College of Holy Cross, Harvard University and Michigan State University worked with Somerville Public Schools and a wide range of community stakeholders to identify nearly three dozen school quality factors within five major categories. These five categories consisted of two, three and four subcategories and each subcategory included two metrics. Each metric was then operationalized for measurement, drawing on three general sources: administrative data, a teacher perception survey and a student perception survey. Twelve student survey scales were used to operationalize the metrics of the SQF and the focus was on whether these scales measured different dimensions of school quality reliably.

The research team distributed these surveys to 4th-8th grade students and teachers in the Somerville Public Schools during the 2014-2015 and 2015-2016 school years. Overall, the study found that the student perception scales appeared to be measuring different dimensions of school quality reliably.

Other school quality measures such as Student Growth, Whole School Quality and State Accountability Levels indicate that Somerville's school district has made and continues to make considerable progress in meeting the needs of all students. In fact, the majority of Somerville's public schools are Level 1 or Level 2 schools, with Level 1 being the highest on the state's 5-level accountability rating. Somerville's school district also ranks among the highest within urban districts in student growth percentile, with the district's growth percentile well above the state average. This research team has been working with Somerville's school district and other districts in developing a Whole School Quality index that looks at additional factors of importance in identifying school quality.

3. Contributing Factors of Disparities in Access to Opportunity

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

- **Location of environmental health hazards:** The East Somerville and Winter Hill neighborhoods are in close proximity to two major highways: Interstate 93 and McGrath Highway, increasing exposure to environmental health hazards and particulate emissions for those residents living in public housing developments.
- **Location of proficient schools and school assignment policies:** The absence of a public school bus system in Somerville limits the level of equitable access for some students under the School Choice program.
- **The availability, type, frequency, and reliability of public transportation:** As was noted by many residents during community engagement efforts, more transportation is needed between the North and South parts of the City, and directly into Cambridge. At this time, public transportation runs most frequently and reliably from East to West.
- **Lack of training opportunities for low-wage or unskilled workers:** Some residents have limited employment opportunities because of limited work skills and/or English language proficiency.

iv. **Disproportionate Housing Needs**

1. **Analysis**

- a. *Which protected class groups (by race/ethnicity and familial status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups for the jurisdiction and region? Which groups also experience higher rates of severe housing burdens when compared to other groups?*

HUD Table 9 - Demographics of Households with Disproportionate Housing Needs						
Disproportionate Housing Needs	(Somerville, MA CDBG, HOME, ESG) Jurisdiction			(Boston-Cambridge-Newton, MA-NH) Region		
	# with problems	# households	% with problems	# with problems	# households	% with problems
Households experiencing any of 4 housing problems						
Race/Ethnicity						
White, Non-Hispanic	8,895	24,640	36.10%	484,020	1,388,020	34.87%
Black, Non-Hispanic	859	1,588	54.09%	57,645	109,814	52.49%
Hispanic	1,230	2,205	55.78%	70,270	126,940	55.36%

Asian or Pacific Islander, Non-Hispanic	940	2,374	39.60%	39,834	99,401	40.07%
Native American, Non-Hispanic	19	43	44.19%	1,027	1,994	51.50%
Other, Non-Hispanic	319	664	48.04%	13,496	29,510	45.73%
Total	12,265	31,520	38.91%	666,290	1,755,660	37.95%
Household Type and Size						
Family households, <5 people	4,565	12,774	35.74%	309,885	964,390	32.13%
Family households, 5+ people	805	1,535	52.44%	60,005	147,135	40.78%
Non-family households	6,890	17,205	40.05%	296,425	644,190	46.02%
Disproportionate Housing Needs						
	(Somerville, MA CDBG, HOME, ESG) Jurisdiction			(Boston-Cambridge-Newton, MA-NH) Region		
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	4,175	24,640	16.94%	223,925	1,388,020	16.13%
Black, Non-Hispanic	409	1,588	25.76%	31,835	109,814	28.99%
Hispanic	700	2,205	31.75%	40,905	126,940	32.22%
Asian or Pacific Islander, Non-Hispanic	539	2,374	22.70%	22,474	99,401	22.61%
Native American, Non-Hispanic	19	43	44.19%	624	1,994	31.29%

Other, Non-Hispanic	149	664	22.44%	7,303	29,510	24.75%
Total	5,995	31,520	19.02%	327,085	1,755,660	18.63%

Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: Data Sources: Comprehensive Housing Affordability Strategy (CHAS), 2008-2012

Housing Problems. As indicated in HUD Table 9 also found in Appendix B, Black, Hispanic, Native American, and other non-Hispanic Somerville residents experience higher rates of the four housing problems--incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%--than White and Asian or Pacific Islander Somerville residents. Just under 40% of Somerville residents in all of the race/ethnicity categories experienced these issues.

In Somerville, households of 5 or more people experience the four housing problems at the highest rate (52.44%), followed by non-family households at 40.05%. Family households of less than 5 people experience these four housing problems the least, at 35.74%.

In the Boston-Cambridge-Newton, MA-NH CBSA region, people experience housing problems at very similar rates to those in Somerville, with no more than a 3% difference except for regional Native American, non-Hispanic households which experience 7.31% more housing problems than in Somerville.

Within the region, households with 5 or more people and non-family households experience the four housing problems at a higher rate than family households of less than 5 people. Family households of any size within Somerville experience the four housing problems more than family households of any size within the region, and most significant, family households with 5 or more people experience problems 11.66% more often in Somerville than in the region. Non-family households in Somerville, however, experience the four housing problems less than non-family households in the region with Somerville approximately 6% less than the region.

Severe Housing Problems. In general, the rates of households of all race/ethnicities experiencing severe housing problems are fairly similar between Somerville and the region; however, there are some areas of note. Within Somerville, 44.19% of Native American, non-Hispanic households experienced the four *severe* housing problems --incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%--with the next highest incidence among Hispanic residents, at at 31.75%. Regionally, no race/ethnicity experienced the severe housing problems at a rate as high as 44%; the highest incidence was among Hispanic households at 32.22%. The greatest difference

between Somerville and the region was among Native American, non-Hispanic households, who experienced severe housing problems 12.9% more often in Somerville than in the region, although it should be noted that the population of Native American, non-Hispanic residents in Somerville is fairly small.

- b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?*

Within Somerville, East Somerville experiences the greatest housing burdens, according to HUD Map 6. Within the region, the metro Boston area experiences the greatest housing burdens. The areas that are most segregated in Somerville tend to be those that are mostly made up of White residents. East Somerville is more integrated than other parts of the City, mostly due to its higher levels of racial minorities and individuals who were born in countries other than the United States. Somerville does not have any R/ECAPs. The predominant national origin groups in Somerville are Brazilian, Portuguese and Indian. The predominant national origin groups regionally are Chinese, Dominican (from the Dominican Republic) and Brazilian.

- c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing for the jurisdiction and region.*

Among families with five or more people, 52.44% of Somerville families and 40.78% of families regionally have experienced at least one of the four housing problems, which includes overcrowding. According to Table 11 found in Appendix B, 21.51% of Somerville households in public housing include children. Most (66.95%) public housing units have one bedroom, (16.01%) have two bedrooms, and 16.70% have three bedrooms. Within project-based Section 8 housing, 12.7% of Somerville households include children. Only 20.82% of Section 8 units have two bedrooms, and only 2.89% have three bedrooms. Based on Table 11 below for other multi-family publicly-supported housing in Somerville, all households live in one-bedroom units. Among households with Housing Choice Vouchers, 24.47% include children, 47.47% of households are in one-bedroom units, 31.60% are in two bedroom units, and 18.40% are in three-bedroom units.

Among all of the publicly supported housing programs, it is clear that the majority of households are in units that are inadequate to their needs, and in many cases families with children are crowded into one-bedroom units. With housing costs in Somerville continuing to rise, this is the only way that many families can afford any housing at all.

Table 11 - Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children

	(Somerville, MA CDBG, HOME, ESG) Jurisdiction							
	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	389	66.95%	93	16.01%	97	16.70%	125	21.51%
Project-Based Section 8	776	72.46%	223	20.82%	31	2.89%	136	12.70%
Other Multifamily	29	50.00%	0	0.00%	0	0.00%	0	0.00%
HCV Program	356	47.47%	237	31.60%	138	18.40%	206	27.47%

Note 1: Data Sources: *A Picture of Subsidized Households (APSH)* HUD internal data system

d. Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.

Table 16 - Homeownership and Rental Rates by Race/Ethnicity

	(Somerville, MA CDBG, HOME, ESG) Jurisdiction				(Boston-Cambridge-Newton, MA-NH) Region			
	Homeowners		Renters		Homeowners		Renters	
Race/Ethnicity	#	%	#	%	#	%	#	%
White, Non-Hispanic	9,370	86.24%	15,275	73.95%	954,555	87.97%	433,470	64.64%

Black, Non-Hispanic	300	2.76%	1,290	6.25%	36,800	3.39%	72,990	10.88%
Hispanic	355	3.27%	1,865	9.03%	32,590	3.00%	94,345	14.07%
Asian or Pacific Islander, Non-Hispanic	705	6.49%	1,670	8.09%	48,455	4.47%	50,940	7.60%
Native American, Non-Hispanic	4	0.04%	30	0.15%	775	0.07%	1,224	0.18%
Other, Non-Hispanic	125	1.15%	525	2.54%	11,880	1.09%	17,635	2.63%
Total Household Units	10,865	-	20,655	-	1,085,050	-	670,610	-

Note 1: Data presented are numbers of households, not individuals.

Note 2: Data Sources: CHAS

In Somerville there are about half as many homeowner households as there are renter households. This is a considerable departure from the Boston-Cambridge-Newton, MA-NH region where there are one and a half as many homeowner households as there are renter households.

According to HUD Table 16 in Appendix B, most of Somerville's and the region's homeowners are White. There are 10,865 homeowner households and 20,655 renter households in Somerville: 86.24% of homeowners are White, and 73.95% of renters are White. Of 1,085,050 homeowner households and 670,610 renter households in the region: 87.97% of the homeowners are White and 64.64% of the renters are White. Somerville has 9.31% more White renters than the region. The percentage of White homeowners is practically the same in Somerville and the region.

Asian or Pacific Islander and non-Hispanic households are the next highest percentage of homeowners in both Somerville and the region, at 6.49% and 4.47% respectively. The combined number of Black, non-Hispanic, Hispanic, Native American, non-Hispanic, and Other non-Hispanic homeowner households make up less than 8% of all homeowner households in Somerville (7.2%), and in the the region (7.6%).

Somerville Assessing Department records show that there are approximately 33,000 housing units in Somerville, and there are 9,000 residential exemptions (a tax exemption for homeowners who live in their homes) for households occupying the property as their primary principal residence. It is therefore estimated that there are approximately 24,000 rental units within the City.

2. Additional Information

- a. *Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.*

Inclusionary Zoning

Somerville's current inclusionary zoning ordinance requires that for new developments of 18 or more units, 20% of those units must be affordable (one of the highest rates of required affordability in the country). Developments of 8-17 units are required to make 17.5% of the units affordable, and developments of 6-7 units will have the option of building an affordable unit or making a cash payment to the Somerville Affordable Housing Trust Fund (SAHTF). These units fall between 50%-110% of the Area Median Income (AMI) for rentals, and 80%-140% AMI for ownership units.

The affordable rent is based on all costs associated with the unit including parking, utilities, and other amenities and 50% AMI rental units are tied to HUD's Low HOME rent, 80% AMI rental units are tied to HUD's High HOME rent and the new 110% rental tier is based off the actual income of the household occupying the unit who is somewhere between 81-110% AMI. The tables below show the current number of rental and homeownership units at different rates of affordability. These tables do not include units currently in the pipeline which have not received a Certificate of Occupancy from the City's Inspectional Services Department (ISD). There are at least 62 affordable rental units currently under construction which are anticipated to be complete between now and the end of 2018. As of the preparation of this AFH, there are 120 inclusionary rental units and 74 total inclusionary homeownership units in Somerville.

The current inclusionary housing ordinance became effective May 9, 2016. The units currently available and in the pipeline were permitted under the previous ordinance, which required up to 12.5% of units to be affordable. Income eligibility for rental units under the prior ordinance was set at 50% and 80% AMI and income eligibility for homeownership units was set at 80% and 110% AMI. Although some projects subject to the new ordinance have gone through the permitting process, they may not be near completion at this time; there are no homeownership units currently listed below that are available to households with incomes below 140% AMI.

The units are available through an application and lottery process for each opportunity. For projects permitted before May 9, 2016 which are rental, the highest preference goes to households who are currently on the Somerville Housing Authority (SHA) waitlist for either Section 8 or Public Housing and the second preference goes to households who currently live or work full-time in Somerville. In the case of homeownership, highest preference goes to households who currently live or work full-time. In all cases, in order for a household to receive preference, they must submit current verification documentation with their application. The Housing Division is currently reviewing Inclusionary preferences, and is also considering moving to a universal waitlist for its affordable rental opportunities.

The older ordinance had included a preference for larger family size units. The updated ordinance also provides that bedroom distribution in the affordable units should be consistent with the purposes of the Ordinance and should include two and three bedroom units.

Although the units available through the inclusionary housing ordinance are not set aside for households with incomes at the lower income levels, it provides a preference to current residents of Somerville who are in receipt of a Section 8, MRVP or other rental voucher with potential housing at affordable rent rates capable of passing an inspection. Both inclusionary rental and homeownership units are in buildings safe from lead and normally have access to an elevator.

Housing Program Income Limits				
2017 PMSA Boston, MA Area Median Income (AMI) \$103,400				
No. or persons in household	50% AMI	80% AMI	110% AMI	140% AMI
1	\$36,200	\$54,750	\$75,537	\$96,138
2	\$41,400	\$62,550	\$86,328	\$109,872
3	\$46,550	\$70,350	\$97,119	\$123,606
4	\$51,700	\$78,150	\$107,910	\$137,340
5	\$55,850	\$84,450	\$116,543	\$148,327
6	\$60,000	\$90,700	\$125,176	\$159,314

Source: Department of Housing and Urban Development

No. of Inclusionary Units by AMI			
AMI	Rental	Homeownership	Total
50%	64	1	65
80%	56	48	104
110%	-----	25	25

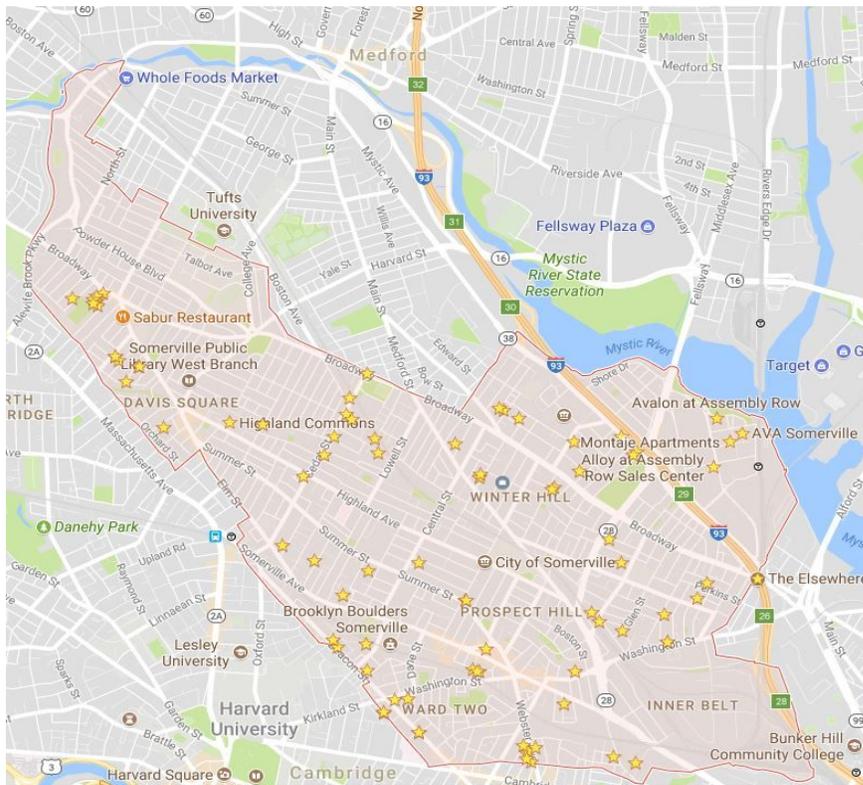
Source: City of Somerville Housing Division

No. of Inclusionary Units By Type			
Unit Type	Rental	Homeownership	Total
SRO	2	-----	2

Studio	9	6	15
1 BR	52	19	71
2 BR	53	30	83
3 BR	4	16	20
4 BR	-----	3	3
Total	120	74	194

Source: City of Somerville Housing Division

The inclusionary units are scattered throughout the city, as can be seen in the map below. Stars indicate the location of either inclusionary rental or homeownership units, but not the number of units at each location.



Location of Inclusionary Units, Source: Google Maps

Condominium Conversions

Of the 5,119 condominium units in Somerville, roughly 78% are the result of conversion from a rental unit and approximately 21% are the product of new construction. Somerville is comprised predominantly

of renter households, and the steady number of conversions to condominiums, presents households with the challenge of finding affordable housing in a market with rising housing costs and a low vacancy rate of 2%, as of ACS 2015. As the trend to convert older single family or multifamily homes to smaller condos continues, Somerville will likely see a rise in not only smaller units but also homeownership opportunities.

Total number of units converted in FY17 and FY16

Fiscal Year	Total Units Converted	% Vacant Units
FY17	182 units	85% vacant
FY16	194 units	80% vacant

Source: FY17 Condominium Review Board Summary Information Report

Support for Sexual and Domestic Violence Survivors

Somerville is fortunate to have the non profit organization Respond, Inc. operating within our borders. Respond was New England's first domestic violence prevention agency and second in the nation. For over 40 years, Respond has provided shelter, a crisis hotline, support services, training and education to more than 100,000 members of the community. Services are free, confidential, and available to all survivors of domestic abuse—women, men, teens and children.

On January 25, 2017, the date of the most recent annual Point-in-Time Count of people who are homeless in Somerville, there were 20 victims of domestic violence in emergency shelters (MA-517 Somerville CoC 2017 PIT Count). A shortage of adequate resources for housing support generally makes it especially difficult for domestic violence victims to find safe, affordable housing. Both the state and the federal government funded more housing support and supportive service programs than they do currently. All supportive service programs within the City’s Continuum of Care have lost funding, with the exception of one Coordinated Entry Program. Low to moderate income residents experiencing housing instability or homelessness are drawing upon limited resources such as the U.S. Department of Housing and Urban Development’s Emergency Solutions Grants (ESG), Somerville Community Preservation Act Funds and the Somerville Affordable Housing Trust Fund to assist with rental assistance, case management, and housing search assistance.

Disability and Housing in Somerville

Somerville Housing Division staff conducted a survey as part of its Welcoming and Inclusive Neighborhoods Somerville (WINS) AFH outreach effort. Respondents noted both the limited affordable housing options for disabled households, and that most multi-family homes are not ADA compliant, further limiting available housing options for people with physical disabilities as reflected in the table below.

Parcel Count by Property Type

Description	FY17 Parcel Count
Single Family	2,347
Condominium	5,119
Two Family	5,140
Three Family	2,305
2 or More Residential Buildings/1 Lot	72
Apartments 4+	663
Vacant Residential Land	175
Commercial	592
Industrial	104
Mixed Use Residential	258
Mixed Use Commercial	-

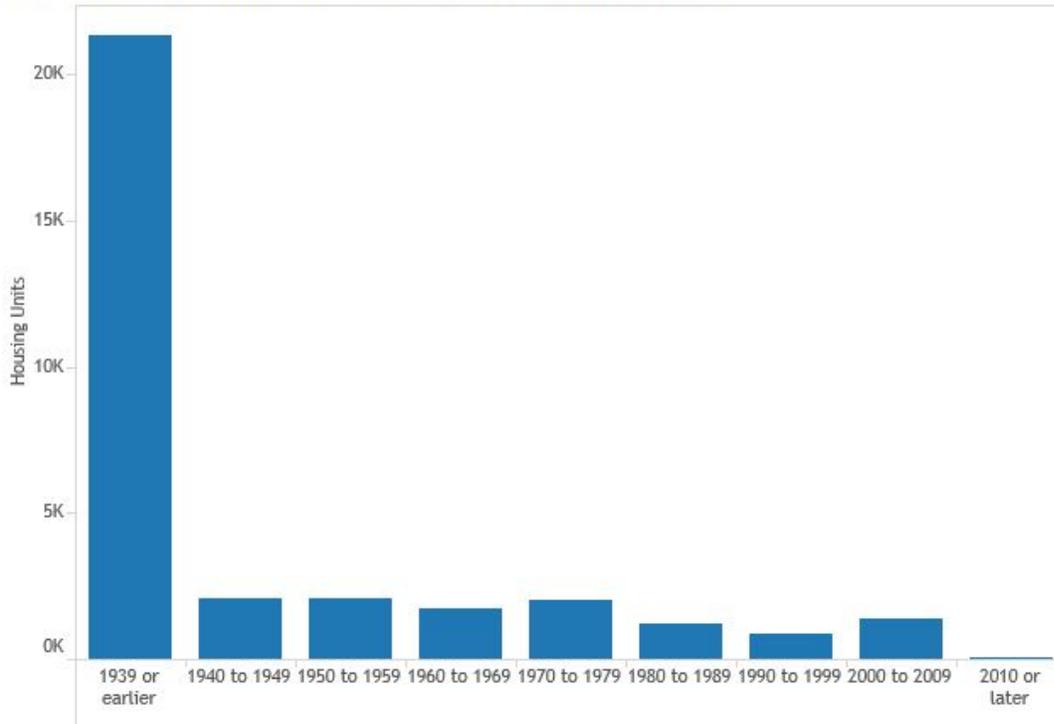
Source: City of Somerville, Assessing Department

As shown in the bar chart below, more than two-thirds of housing units are at least 75 years old. Older multi-family housing stock presents a challenge for Somerville residents with disabilities as discussed further below.

The following two tables present data on disability from Somerville’s 2015 Housing Needs Assessment report. The table immediately below shows that 9.7% of the population or 7,374 people have a disability (ACS 2012). Of those who are disabled adults, 61.4% are not in the workforce, as compared to 19.8% of the non-disabled population that is not in the workforce.

The ensuing table shows that 40.6% of seniors age 65 and over have a disability, with 26.5% of them having an Ambulatory Disability. In comparison, 7.4% of the working age population (18-64 years of age) and 5.5% of school age children (5-17 years old) have a disability.

Somerville, Massachusetts: Year Built for All Housing Units



Source: U.S. Census Bureau, 2010-2012 American Community Survey

Income and Employment by Disability Status, 2012					
	Total Population	With a Disability		No Disability	
		#	%	#	%
Total civilian noninstitutionalized population	75,772	7,374	9.7%	68,398	90.3%
Population Age 16 and Over	66,743	7,117	10.7%	59,626	89.3%
Employed	70.1%	2,263	31.8%	44,541	74.7%
Not in Labor Force	24.5%	4,562	64.1%	11,806	19.8%
Median Earnings	\$35,442	\$31,071	-	\$35,774	-
Below 100 percent of the poverty level	14.5%	1,807	24.5%	10,078	13.3%

Disability Type by Age, 2012			
	Total Population	With a disability	
		#	%
Total civilian noninstitutionalized population	75,772	7,374	9.7%
Population under 5 years	4,010	50	1.2%
Population 5 to 17 years	6,101	334	5.5%
Population 18 to 64 years	59,172	4,354	7.4%
With a hearing difficulty	-	804	1.4%
With a vision difficulty	-	1,834	3.1%
With a cognitive difficulty	-	1,772	3.0%
With an ambulatory difficulty	-	1,308	2.2%
With a self-care difficulty	-	699	1.2%
With an independent living difficulty	-	1,200	2.0%
Population 65 years and over	6,489	2,636	40.6%
With a hearing difficulty	-	1,127	17.4%
With a vision difficulty	-	441	6.8%
With a cognitive difficulty	-	662	10.2%
With an ambulatory difficulty	-	1,722	26.5%
With a self-care difficulty	-	661	10.2%
With an independent living difficulty	-	1,161	17.9%

Regional data shows a similar pattern to trends in Somerville: that the 65-and-over population experiences the greatest incidence of disability. (Note that the incidence is 9.5% higher in Somerville than in the region). Among working-age residents ages 18-24, the incidence of disability is 1.2% higher in Somerville than in the region, and among the school-age population it is 0.4% higher.

Middlesex County Disability Data

Subject	Total Number	Number with Disability	Percent with Disability
Total Civilian Noninstitutionalized Population	1,522,473	137,255	9%
Population under 5 years old	86,496	786	.9%
Population 5 to 17 years old	233,362	11,979	5.1%
Population 18-64	1,001,153	61,785	6.2%
Population 65 and over	201,462	62,705	31.1%

<i>Percent with an ambulatory difficulty</i>		<i>38,570</i>	<i>19.1%</i>
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Source: ACS, 2012

Ensuring access to quality, accessible and affordable housing options within the City for this protected class is an ongoing challenge.

Zoning Overhaul

The Mayor’s Office of Strategic Planning and Development (OSPCD) has been working towards a zoning overhaul. OSPCD’s Planning and Zoning Division transmitted a proposed zoning ordinance to the Board of Aldermen (BOA) in 2015. Intensive public outreach yielding almost 900 comments, questions and selected concerns from the community engagement process. The BOA subsequently requested a series of technical studies, which have since been completed. All comments were reviewed and incorporated, or addressed in the revised draft the City plans to present again this fall.

One of the goals is to provide a range of housing types, unit sizes, and price points to accommodate the diverse household sizes and life stages of Somerville residents at all income levels, with particular attention to encourage housing that is affordable to individuals and families with low and moderate incomes. The proposed zoning would open several areas of the City, such as Inner Belt, Brickbottom, and Boynton Yards, to allow for major commercial and residential development. A related goal is to separate the cost of off-street parking from the cost of housing, so that development, including new housing, is more affordable.

Homelessness

The City recognizes that homelessness is a crucial component in addressing the context of affordable housing and economic pressures confronting residents. The City serves as lead to the Somerville Continuum of Care (CoC), which also incorporates the Town of Arlington into its geographic area.

As of the fall of 2017, the Somerville CoC has nine permanent supportive housing programs, two transitional housing programs, and one Coordinated Entry supportive service program. As you can see from the table below, the transitional (TH) and emergency (ES) sheltered numbers for the most part have remained fairly consistent. This past year, we reclassified a transitional program to permanent housing and the Just a Start House emergency shelter closed in May of 2016, which account for the decrease in those sheltered in emergency and transitional housing. Our street homeless numbers however increased. Within Somerville, it jumped from 6 to 15, and within Arlington, it jumped from 0 to 7 for the total of 22 street homeless. While the weather was fairly mild on January 25, 2017 during the overnight hours of the count, based on new reported known locations of street homeless, the CoC also had more volunteers and was able to canvass a larger area.

Date of Count	Sheltered ES Total Persons	Sheltered TH Total Persons	Sheltered SH Total Persons	Unsheltered Total Persons	Total Persons
<u>01/25/2017</u>	75	45	0	22	142
<u>01/27/2016</u>	94	65	0	6	165
<u>02/25/2015</u>	94	58	0	6	158
<u>01/29/2014</u>	94	56	0	4	154
<u>01/30/2013</u>	99	61	0	9	169
<u>01/25/2012</u>	102	34	0	9	145
<u>01/27/2011</u>	98	34	0	5	137
<u>01/27/2010</u>	108	30	0	4	142
<u>01/29/2009</u>	98	30	0	4	132

Source: MA-517 CoC data, as reported in Homelessness Data Exchange

The Housing Division works with Somerville Housing Coalition (SHC) to fund the PASS program to provide rental assistance, case management, and stabilization services to prevent homelessness and help homeless and near-homeless families and individuals transition into housing. The funds allocated to this program are from HUD’s HOME Investment Partnerships Program, with supplemental funds from the Somerville Affordable Housing Trust Fund and the Community Preservation Act and funding to households is up to two years. This program is vital as the waitlist for section 8 vouchers from the Somerville Housing Authority is at least two years or more. The City’s Affordable Housing Trust Fund also provides SHC with funding that is used to assist households with security deposits, first/last month’s rent, moving costs and realtor fees, with up to \$3,000 per household for this one-time assistance.

Somerville Affordable Housing Trust Fund

In addition to HUD CoC and ESG funding to support the homeless and those imminently at risk of homelessness, the Somerville Affordable Housing Trust Fund provides funding to agencies to provide housing services to low to moderate income households, such as landlord tenant mediation, housing counseling, foreclosure prevention, and tenancy stabilization. Additionally, the Trust has provided closing

cost assistance for households between 81-110% AMI. The source of Trust funding is primarily through Inclusionary fractional payments as well as linkage payments.

The Trust also administers community housing funds of the Community Preservation Act (CPA). The Somerville Community Preservation Committee has voted since its inception to allocate 45% of the annual CPA funds to the Trust for community housing. Trust administered CPA funds have provided funding for rental assistance programs, as well as the creation of new affordable housing in the City. 100 Homes is the newest and largest program initiative the Trust has supported to create new affordable housing, and the goal of the program is to secure housing stock from market forces for affordable housing where none previously existed. The additional affordable housing will assist in mitigating the effects of economic pressures and gentrification that will occur along the Green Line Extension once that project is completed. The City's Community Housing Development Organization, Somerville Community Corporation (SCC), has been purchasing multi-family properties throughout the City to maintain ownership as rentals and rehabilitating the units before renting them out to households primarily at 80% and 100% AMI, although the Program also permits some market rate units as well. CPA community housing funds from the Trust have been used to purchase the affordability and the program has also leveraged revolving loan funds from the Massachusetts Housing Investment Corporation as well. While the majority of affordable units created through the Program will be affordable for moderate to middle income households, SCC has also created 5 units restricted to households at or below 50% AMI. To date, the Program has yielded a total of 20 units of housing, of which 18 will be rentals, and 2 will be affordable homeownership units.

Purpose Built Affordable Housing

Purpose built or all affordable housing is another important component of housing in Somerville. Purpose built affordable housing has created 33 homeownership units and 784 rental units. City funding sources for purpose built affordable housing include Community Development Block Grant, HOME Partnership Investments Program, Challenge Grant, Somerville Affordable Housing Trust, and Community Preservation Act funds. The high cost of housing and land, coupled with high construction costs and the fact that Somerville is relatively built out at this point make purpose built affordable housing challenging. These projects often take years to piece the financing together through competitive state funding rounds private permanent financing and tax credits, in addition to local City funding.

Transformative areas of the City have been earmarked for 85% of potential future new development, and include areas of Union Square, Brickbottom, Inner Belt and Boynton Yards. With the anticipated zoning overhaul to unlock the potential in these transformative areas, this will certainly be an area to explore for future purpose built housing, along with redevelopment in existing areas such as the 35 units of affordable rental housing at 181 Washington Street, the site of a former Boys and Girls Club.

- b. The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA's overriding housing needs analysis.*

Other information relevant to our assessment of disproportionate housing needs is discussed in other sections.

3. Contributing Factors of Disproportionate Housing Needs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs.

- **Availability of affordable units in a range of sizes:** There are not enough publicly supported units with more than one bedroom to meet the supply of families who need public housing. Waitlists for publicly supported housing are increasingly long, and residents are often forced to look outside of Somerville when they move.
- **Displacement of residents due to economic pressures:** A significant number of residents are cost burdened and face severe housing problems. Middle income residents who do not qualify for housing assistance but cannot afford exuberant rent prices are perhaps most at risk of displacement.
- **Lack of housing support for victims of sexual harassment, including victims of domestic violence:** A lack of affordable housing disproportionately impacts those who experience sexual and domestic violence. These individuals often need emergency support to leave unsafe living conditions and without an adequate housing supply they are restricted in their ability to leave abusive situations.
- **Land use and zoning laws-condominium conversions:** Somerville's zoning ordinance is three decades old and inordinately restricts development in several areas of the City where residential development is not allowed. The City is currently in the process of a zoning overhaul that addresses these issues.
- **Inadequate access to information about housing opportunities and housing support programs:** In order to provide equal opportunities for all residents of Somerville to access housing opportunities, information must be made available in a variety of formats.
- **Lending discrimination:** Since the meltdown of the subprime mortgage lending industry, there has been an increase in the market share of government-backed loans (GBLs), which is considered to be an indication of the reduced availability of prime mortgage loans. GBLs are typically more costly than prime loans and measuring the number of GBLs within the community can provide a measure of access to lending products. Of the 521 home purchase loans made for Somerville-based purchases in 2014, only 11 were government backed (2.1%), as compared to Greater Boston, where GBLs accounted for 10% of all home-purchase lending (Changing Patterns XXII, Mortgage Lending to Traditionally Underserved Borrowers & Neighborhoods in Boston, Greater Boston and Massachusetts, 2014 by Jim Campen). Of 300 refinance loans in Somerville in 2014, only 10 (3.3%) were government backed (*ibid*). For first lien home purchase loans for owner occupied homes in Somerville in 2014, there were 3 Black borrowers, none of whom received a GBL, 9 Latino borrowers, none of whom received a GBL; and 395 White borrowers, of which ten or 2.5% received a GBL (*ibid*). Of the 11 GBLs for home purchase loans in Somerville in 2014, one loan was to a

moderate income household (50-80% of Median Family Income (MFI) for the area), two loans were to middle income households (80-120% of MFI), seven loans to high income households (120-200 of MFI) and one loan was to the highest income (over 200% of MFI) (*ibid*).

As indicated above, the majority of homeowners in Somerville as well as the region are White. If prime loans are more difficult to get than GBLs, the 2014 data reviewed above also suggests that obtaining a GBL with a low- to middle- income is very difficult, with the majority of GBLs going to households with higher incomes.

The City offers closing cost assistance of up to \$5,000 based on documented need and down payment assistance of up to 15% of the purchase price based on documented need for households at or below 80% AMI through funds from the HOME Investment Partnerships Program. Households cannot obtain both closing cost and down payment assistance, and must elect one. If a household is purchasing an affordable Inclusionary condominium, the household can only obtain closing cost assistance. Additionally, the City offers closing cost assistance of up to \$3,500 based on documented need to households between 81-110% AMI from the Somerville Affordable Housing Trust Fund.

C. Publicly Supported Housing Analysis

1. Analysis

a. Publicly Supported Housing Demographics

i. Are certain racial/ethnic groups more likely to be residing in one category of publicly supported housing than other categories (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and Housing Choice Voucher (HCV)) in the jurisdiction?

HUD Table 6 - Publicly Supported Households by Race/Ethnicity								
(Somerville, MA CDBG, HOME, ESG) Jurisdiction	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	325	56.62%	133	23.17%	86	14.98%	30	5.23%
Project-Based Section 8	615	60.24%	211	20.67%	116	11.36%	76	7.44%

Other Multifamily	22	84.62%	4	15.38%	0	0.00%	0	0.00%
HCV Program	462	63.20%	147	20.11%	113	15.46%	5	0.68%
Total Households	24,640	78.17%	1,588	5.04%	2,205	7.00%	2,374	7.53%
0-30% of AMI	3,505	67.79%	579	11.20%	580	11.22%	370	7.16%
0-50% of AMI	5,310	60.55%	829	9.45%	950	10.83%	624	7.12%
0-80% of AMI	8,465	66.00%	1,034	8.06%	1,155	9.01%	984	7.67%
(Boston-Cambridge-Newton, MA-NH) Region	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	8,192	36.45%	5,754	25.61%	6,339	28.21%	2,145	9.55%
Project-Based Section 8	13,925	40.88%	7,008	20.57%	9,421	27.66%	3,605	10.58%
Other Multifamily	1,626	63.02%	431	16.71%	329	12.75%	187	7.25%
HCV Program	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Total Households	1,388,020	79.06%	109,814	6.25%	126,940	7.23%	99,401	5.66%
0-30% of AMI	175,030	63.64%	31,205	11.35%	42,425	15.43%	19,725	7.17%
0-50% of AMI	262,205	55.87%	48,930	10.43%	65,075	13.87%	29,019	6.18%
0-80% of AMI	415,335	61.81%	65,779	9.79%	83,380	12.41%	39,024	5.81%

Note 1: Data Sources: Decennial Census; APSH; CHAS

Note 2: Figures presented are numbers of households, not individuals.

Based on information in HUD Table 6 in Appendix B, which presents data by race/ethnicity for persons occupying four categories of publicly supported housing, including public housing, project-based Section 8, Other Multifamily (including Section 202-supportive housing for the elderly and Section 811-supportive housing for persons with disabilities) and Housing Choice Vouchers (HCV), several observations are possible.

- White residents comprise over half (56.6%) of all residents of public housing, compared to 23.2% comprised by the Black population and nearly 15% by the Hispanic population. The Asian population represents the smallest proportion of public housing residents at 5.2%.
- White residents amount to the majority (60.2%) of participants in project-based Section 8 assisted units, followed by Black residents at 21% and Hispanic residents at 11.4%. Similar to public housing, Asian or Pacific Islander residents represent the smallest rate of participation at 7.4%.
- Eighty-five percent (85%) of residents in Other Multifamily housing are White, compared to 15.4% of Black residents. There is no presence of Hispanic and Asian or Pacific Islander residents in Other Multifamily housing.
- White residents make up the majority of participants in the HCV Program at 63.2% , followed by Black residents at 20%. Hispanic residents comprise 15.5% of all residents in the HCV program while Asian or Pacific Islanders represent a comparatively small rate at 0.7%.

ii. Compare the racial/ethnic demographics of each category of publicly supported housing for the jurisdiction to the demographics of the same category in the region.

To summarize, Somerville’s White population has the highest percentage of residents living in each of the four categories of publicly supported housing. More of Somerville’s Black residents live in project-based Section 8 housing than in other types of publicly supported housing, while more Hispanic residents participate in the HCV Program. Regionally, as in Somerville, White residents comprise the majority of residents living in the four categories of publicly-supported housing; regionally however, Hispanics are the next most populous group in both public housing and Section 8 housing. Asian or Pacific Islander residents overall comprise the lowest rate of all residents in all four categories of publicly supported housing, both locally and regionally.

As previously referenced, Somerville has a rich history of immigration dating back to the 19th century, when large numbers of European immigrants settled in the area and stayed over multiple generations. The remnants of this pattern can still be seen in an elderly population that is predominately White, reflecting the countries their ancestors emigrated from such as Ireland and Italy. About 40% of the publicly supported housing in Somerville is designated for seniors and the disabled according to the 2015 HNA,

which helps to explain why White residents are so heavily represented in the preceding statistics. As Somerville continues to grow and evolve, so will the needs of the population.

ii. Compare the demographics, in terms of protected class, of residents of each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant category of publicly supported housing in the jurisdiction and region. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

In addition to presenting the relationship between race/ethnic populations and housing type, HUD Table 6 in Appendix B also includes the total number of households for each of the four race/ethnic populations and percentages of the area median income (AMI) used to determine income eligibility for affordable housing programs locally and regionally.

In in the context of publicly supported housing, HUD Table 6 in Appendix B shows there is a higher percentage of White households with incomes under 80% of the area median income (AMI) compared to any other racial/ethnic group both in Somerville and regionally. The second largest percentage of households with incomes under 80% AMI both locally and regionally is Hispanic, followed by Black and Asian or Pacific Islander households. The second largest race/ethnic group in Somerville is Asian or Pacific Islander while regionally, they are the smallest race/ethnic group. In Somerville, Hispanic households are the third largest population and are the second largest regionally. In Somerville, the majority of the Hispanic population earns less than 30% of the AMI, similar to the region.

Somerville has the smallest number of Black households compared to other racial/ethnic populations listed in the table above. However, they are the third largest population present regionally. Similar to Hispanic residents, the highest percentage of Black households earn less than 30% of the AMI both locally and regionally.

White, Black and Hispanic populations have the highest percentage of households earning less than 30% of the AMI compared to other affordability thresholds within their respective protected class in Somerville and regionally. A higher percentage of Asian or Pacific Islanders in Somerville earn less than 80% of the AMI as compared to other affordability thresholds within their protected class; regionally however, more Asian or Pacific Islanders earn less than 30% of the AMI, compared to other affordability thresholds within their protected class.

b. Publicly Supported Housing Location and Occupancy

i. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs in the jurisdiction and region

HUD Map 5 in Appendix A shows a concentration of Black and Hispanic residents living in public housing developments located in East Somerville, and a large percentage of White Non-Hispanic residents living in public housing developments closer to Somerville's border with East Cambridge.

Geographically, most Somerville mobile voucher holders live in the East Somerville, Winter Hill and Prospect Hill neighborhoods and less so in Davis Square. Map 5 also shows the percentage of vouchers greatly diminishes as one moves away from the East Somerville, Winter Hill and Prospect Hill neighborhoods and into Davis Square.

ii. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs in the jurisdiction and region?

HUD Map 5 in Appendix A does not distinguish between developments that serve families with children, elderly, or persons with disabilities locally. However, a TRACS (Tenant Statistical Summary Report) from Somerville Housing Authority (SHA) outlines the percentage of families with children, elderly persons and persons with disabilities in their twelve public housing developments. Six of these developments are federal housing developments that serve either families or senior/disabled individuals. The other six are either state family housing or state senior/disabled housing developments.

SHA public housing developments that primarily serve families with children are predominantly located in East Somerville and the Winter Hill neighborhood; one is located in West Somerville. Between 34%-45% of residents in housing developments located in Winter Hill have no children, while 27% have one child present.

SHA's public housing developments serving senior/disabled residents are located in East Somerville, Union Square, Winter Hill, Teele Square, Prospect Hill, Spring Hill and West Somerville. The majority of residents living in these developments are 71 years old and over. Thirty units within federal housing developments are currently occupied by residents with accessibility needs. Within state-assisted public housing developments, ten are occupied by residents with accessibility needs. In single room occupancy (SRO) designated units, thirty-two residents have accessibility needs.

Although there is no HUD data set provided to compare R/ECAPS in Somerville with R/ECAPS in Boston, one can compare local and regional Non-R/ECAP demographics by publicly supported housing programs. There tend to be more families with children regionally than in Somerville, for all four categories of publicly supported housing. The HCV Program has the highest percentage of families with children, both locally and regionally, compared to other categories of publicly supported housing.

The elderly comprise the majority of project-based Section 8 and Other Multifamily programs in Somerville and in the region. Regionally, the elderly population is more evenly dispersed between R/ECAP and Non-R/ECAP areas.

The percentage of residents with disabilities in publicly supported housing programs is higher in Non-R/ECAP areas in Somerville than Non-R/ECAP areas regionally, with the exception of the Other Multifamily program and HCV program.

iii. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs in the jurisdiction and region?

A comparison of the demographic composition of occupants of publicly supported housing in R/ECAPS to the demographic composition of occupants of publicly supported housing outside of R/ECAPS cannot be made, as R/ECAPS are not applicable in the City of Somerville. Somerville is not identified as a community with racially/ethnically concentrated areas of poverty.

iv. (A) Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category for the jurisdiction? Describe how these developments differ.

The Somerville Housing Authority (SHA) has not pursued development conversions under RAD and the LIHTC program, therefore demographic comparisons cannot be made.

(B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing for the jurisdiction and region.

Somerville's most recent Housing Needs Assessment conducted in 2015 identified a total of 3,341 affordable units in Somerville. The majority of these units are subsidized rental units, including group homes, Somerville Housing Authority (SHA) public housing, housing for formerly homeless and/or veterans and other privately owned subsidized housing. According to the assessment, the maximum income for residents eligible for subsidized housing can be no more than 80% of the area median income (AMI). However, most public housing tenants have much lower incomes, at or below 30% AMI, with average wait times for family or elderly/disabled housing between one and three years.

SHA also administers project-based and mobile Section 8 vouchers that are used to rent housing that is privately owned. Similarly, waiting lists for these vouchers can be upwards of two years or more and have a relatively low payment standard compared to market rents in Somerville. Table 31 outlines the payment standards for Section 8 vouchers in the 2014-2017 calendar years.

Table 31: Somerville Housing Authority Payment Standards 2014-2017

<i>Somerville Housing Authority 2014-2015 Payment Standards</i>			<i>Somerville Housing Authority 2016-2017 Payment Standards</i>		
<i># of Bedrooms</i>	<i>Payment Standard</i>	<i>% of 2015 FMR</i>	<i># of Bedrooms</i>	<i>Payment Standard</i>	<i>% of 2015 FMR</i>
0	\$1,138	106%	0	\$1,138	95%
1	\$1,234	103%	1	\$1,261	92%
2	\$1,448	97%	2	\$1,567	93%
3	\$1,798	97%	3	\$1,945	92%
4	\$2,023	100%	4	\$2,148	92%
5	\$2,236	100%	5	\$2,471	92%

Source: Somerville Housing Needs Assessment, Dec. 2015, prepared by LDS Associates & Somerville Housing Authority website.

With a low voucher-to-market rental cost ratio, residents have great difficulty finding affordable housing with their vouchers and are limited in their choice of neighborhoods. Similar to the HUD data set, the Housing Needs Assessment conducted for the City found a significant amount of public and subsidized rental housing concentrated in Winter Hill, Union Square and Teele Square.

- v. *Compare the demographics of occupants of developments, for each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. For the jurisdiction, describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.*

Table 8 - Demographics of Publicly Supported Housing Developments, by Program Category

Public Housing

(Somerville, MA CDBG) Jurisdiction

Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
Brady Towers	MA031	Somerville Housing Authority	368	76%	15%	5%	3%	N/a
Mystic View Apt	MA031	Somerville Housing Authority	215	22%	37%	32%	9%	59%

Project-Based Section 8

(Somerville, MA CDBG) Jurisdiction

Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
Mt Pleasant Apts-Somerville	N/A	N/A	65	62%	21%	11%	5%	3%
Somerville Ma06h052013	N/A	N/A	134	64%	17%	12%	5%	N/A
Somerville Ma06h052038	N/A	N/A	24	67%	14%	14%	5%	14%
Clarendon Hill Towers	N/A	N/A	347	48%	40%	8%	4%	38%
Mt. Vernon Iii	N/A	N/A	7	N/A	N/A	N/A	N/A	N/A
Mt. Vernon I	N/A	N/A	8	N/A	N/A	N/A	N/A	N/A
B F Faulkner Tower	N/A	N/A	130	73%	12%	9%	6%	N/A
Cobble Hill Apts	N/A	N/A	223	59%	3%	21%	18%	0%
Center House	N/A	N/A	9	N/A	N/A	N/A	N/A	N/A
Mt. Vernon Ii	N/A	N/A	8	N/A	N/A	N/A	N/A	N/A

Pearl Street 219-221	N/A	N/A	6	N/A	N/A	N/A	N/A	N/A
Walnut Street 110	N/A	N/A	12	33%	33%	33%	N/a	34%
Walnut Street Center	N/A	N/A	30	89%	11%	0%	N/A	N/A
Pearl Street Park	N/A	N/A	85	73%	15%	6%	6%	N/A

Other HUD Multifamily Assisted Housing

(Somerville, MA CDBG) Jurisdiction

Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
Broadway	N/A	N/A	8	N/A	N/A	N/A	N/A	N/A
Pearl	N/A	N/A	9	N/A	N/A	N/A	N/A	N/A
Somerville Place	N/A	N/A	8	N/A	N/A	N/A	N/A	N/A
VNA Senior Living Community	N/A	N/A	31	79%	14%	3%	3%	N/A
Jackson Road	N/A	N/A	5	N/A	N/A	N/A	N/A	N/A

Note 1: For LIHTC properties, this information will be supplied by local knowledge.

Note 2: Percentages may not add to 100 due to rounding error.

HUD Table 8 above also found in Appendix B illustrates development-level demographic characteristic of residents in three program categories: public housing, project-based Section 8 and Other Multifamily.

HUD Table 8 found in Appendix B identified two public housing developments in Somerville: Mystic View Apartments and Brady Towers. Although, much of the data collected shows an overall higher number of White households living in publicly supported housing than any of the other three race/ethnicity groups (Black, Hispanic and Asian or Pacific Islander), Mystic View Apartments has a

higher percentage of Black (37%) and Hispanic (32%) households than White and Asian or Pacific Islander groups; the corresponding composition of Black residents in the census tract is only 14%. This contributes to the comparatively large number of Black and Hispanic residents in East Somerville overall, as is evident in HUD Map 5 in Appendix A. In contrast, Brady Towers has a very high percentage of White residents (76%) and is located in a census tract with a White population of 70% or greater.

White households primarily occupy developments with both project-based Section 8 and Other Multifamily programs compared to all other races. These developments are located in areas of Somerville that are also occupied largely by White residents as is evident on HUD Map 5 in Appendix A.

The HUD data set reports occupancy rates for only one development among Other Multifamily housing developments. The occupancy rate for White households is over 70%. Occupancy rates for both Hispanic and Asian populations in Other Multifamily housing are relatively low, however each corresponding census tract exceeds the occupancy rate by 3%-4%.

There is insufficient data to permit an analysis regarding LIHTC properties.

The housing developments with the lowest percentage of children are developments which have the highest occupancy rates of White residents and are predominantly elderly/disabled designated residences.

c. Disparities in Access to Opportunity

i. Describe any disparities in access to opportunity for residents of publicly supported housing in the jurisdiction and region, including within different program categories (public housing, project-based Section 8, Other HUD Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.

Important opportunity indicators both locally and within the region include education, employment, transportation and environmental health.

The HUD School Proficiency Index (SPI) measures the performance of fourth-grade students on state exams as a proxy for school system quality in a neighborhood. The higher the score, the higher the school system quality as measured by this index. School proficiency in Somerville, especially in areas of East Somerville, including Winter Hill, Prospect Hill and Spring Hill where the bulk of publicly supported housing exists, is low, within the 0-30 range on HUD's School Proficiency Index (SPI). Many of the family housing developments with high percentages of children present in the household score much lower on the SPI than children residing in areas close to West Somerville where school proficiency is at minimum 40 on the index.

HUD Table 12 found in Appendix B on Opportunity Indicators, by Race/Ethnicity, illustrates overall lower scores in school proficiency for the total population in Somerville compared to regional scores. White students have the highest school proficiency scores both locally and regionally compared to Black,

Hispanic, Asian or Pacific Islander and Native American students. Race/ethnic groups in Somerville below the federal poverty line score lower than their regional counterparts.

The Low Poverty Index (LPI) captures poverty in a given neighborhood, with high scores meaning *less* exposure to poverty in a given area. As seen in HUD Table 12 in Appendix B, generally, the total population of racial/ethnic groups in Somerville scored between 47.7-61.8 on the LPI. Regionally, White residents had less exposure to poverty than the White population below the federal poverty line in Somerville. Among Black, Hispanic, Asian or Pacific Islander populations in Somerville, residents were less exposed to poverty than their regional counterparts. Native Americans of the total population and of those below the federal poverty line were more exposed to poverty than their regional counterpart. HUD Map 11 shows relatively low scores on the LPI especially in areas where Somerville's public housing developments and high concentrations of Black and Hispanic populations reside.

Labor Market Index (LMI) scores in Somerville are high across all racial/ethnic groups, indicating strong labor force participation and a high level of employment; this is in the region. However, the Jobs Proximity Index (JPI) scores, both locally and regionally, are much lower, potentially indicating that although human capital is high in the area, access to neighborhood-level employment opportunities for residents is limited.

The Transit Index and the Low Transportation Cost Index indicate that the availability, access and affordability of public transportation are not barriers to opportunity for residents of publicly supported housing developments; this reflects the fact that three major train stations and bus service are available in or near East and West Somerville.

Somerville residents experience more exposure to toxins harmful to human health across all racial/ethnic groups compared to the region. HUD Map 13 in Appendix A shows a marked contrast between East Somerville, where the majority of public housing, project-based Section 8 and Other Multifamily housing developments are located, and West Somerville. Of particular interest is the neighborhood close to the Mystic River in which large populations of Black and Hispanic residents reside. HUD Map 13 shows an especially low score on the Environmental Health Index (EHI) in this neighborhood, suggesting that the presence of a major highway is detrimental to the environmental quality of the surrounding neighborhood.

2. Additional Information

- a. Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.*

As noted previously, creating the Welcoming and Inclusive Neighborhoods Somerville (WINS) Survey to collect local resident feedback on fair housing and equity issues in Somerville was among the first actions taken by the SHD. Responses from the WINS Survey reiterated the need for more subsidized housing opportunities for families. In addition, respondents noted that publicly-supported housing, including Clarendon Hills, Mystic Housing, and the St. Polycarp I, II, & III developments, was concentrated near

Route 16 and Mystic Parkway. Some residents felt that these developments should be equally distributed across neighborhoods within close proximity to public transit.

- b. *The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or mobility programs.*

The Somerville Housing Authority (SHA) offers two self-sufficiency programs for residents who participate in federal and state housing programs. The Family Self-Sufficiency program is a voluntary work-based program designed to assist families (residents in federal public housing in Somerville or who have a Section 8 voucher administered by SHA) in becoming economically independent and self-sufficient. The program partners with local agencies to provide a variety of services relating to case management, education and job training. Participants have the opportunity to enter into a Contract of Participation and to contribute to an escrow account. As the household's income increases, their rent share also increases while the Housing Assistance Payment (HAP) decreases. Each rent increase due to an income increase then triggers an increase in funds deposited into the escrow account. The funds escrowed may be use towards education, financial counseling, homeownership, childcare assistance, etc. at the completion and fulfillment of the Contracts of Participation. As seen in the table below, 47% of FSS participants succeed in increasing their income and 38% cease receiving cash assistance altogether as a result of increasing their income.

Somerville Housing Authority	
Program: All FSS programs	FSS Management Report
	Covering Dates: 9/21/16-9/21/17
Question	Answer
How many households were under Contracts of Participation?	97
How many households successfully completed their Contract of Participation/Graduated?	5
How many households involved in this program increased their income?	46
What was the average dollar increase in annual household income?	\$10,767.72
How many households experienced a reduction in cash welfare assistance?	13
How many households ceased receiving cash welfare assistance as a result of increased households income?	37
How many head of households receiving services under the age of 18?	0
How many head of households receiving services are ages 18-30?	24
How many head of households receiving services are ages 31--50?	52
How many head of households receiving services are ages 51-61?	19

How many head of households receiving services are ages 62 and over?	2
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Source: Somerville Housing Authority (SHA)

Similarly, the Massachusetts Learning, Employment and Asset Program (Mass LEAP) is a voluntary self-sufficiency program that provides resources to support financial literacy, education and career development. Families work with coaches in the three areas to establish personal goals that relate to the three focus areas of the program. When a participant’s income increases they are helped to establish an escrow account and make monthly payments that can accrue over time. The accrued savings can be accessed upon successful completion of the participant’s goals for the program.

3. Contributing Factors of Publicly Supported Housing Location and Occupancy

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

- **Admissions and occupancy policies and procedures, including preferences in publicly supported housing:** The findings of the 2015 Somerville Housing Needs Assessment suggest that, although publicly supported housing programs exist in the City of Somerville, essentially all units are fully occupied and have long wait lists. Furthermore, the SHA has found that many tenants with HCVP/Section 8 mobile vouchers cannot find housing in Somerville because market conditions enable landlords to charge extremely high rents. During public meeting discussions, one young woman shared her experience as a voucher holder who had experienced the lack of affordable units due to climbing rents and the unwillingness of landlords to accept voucher payments that are significantly below market rates. There also were reports that many landlords discriminate against residents that utilize housing assistance in general, despite the additional protections that Massachusetts law provides to such tenants.
- **Land use and zoning laws:** Some focus group attendees noted that condominium conversions in Somerville further limit the number of affordable housing units and cause area rents to increase dramatically.
- **Source of income discrimination:** As mentioned above, some focus group participants spoke of being discriminated against due to the source of their income. Focus group participants identified possible reasons for such discrimination, including an expectation that voucher holders are untrustworthy and will be unable to pay rent on time.

D. Disability and Access Analysis

1. Population Profile

- a. *How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?*

As can be seen in HUD Map 14 in Appendix A, people with disabilities are not for the most part concentrated in any particular area throughout Somerville’s neighborhoods. There are small concentrations of people with disabilities living in the East Somerville, Winter Hill, and Union Square neighborhoods. The most common type of disability is independent living in Somerville and ambulatory in the region at 4.23% and 5.40% respectively. Somerville does not have any R/ECAPS; therefore people with disabilities by definition are not concentrated in such areas. Regionally, people with disabilities tend to live closer to urban areas; however most people in general live closer to urban areas. Therefore there are no notable trends regarding where people with disabilities live in the region.

Table 13- Disability by Type				
	(Somerville, MA CDBG, HOME, ESG) Jurisdiction		(Boston-Cambridge-Newton, MA-NH) Region	
Disability Type	#	%	#	%
Hearing difficulty	1,707	2.35%	130,157	3.03%
Vision difficulty	1,168	1.61%	76,520	1.78%
Cognitive difficulty	2,295	3.16%	183,469	4.27%
Ambulatory difficulty	3,074	4.23%	231,880	5.40%
Self-care difficulty	1,331	1.83%	88,850	2.07%
Independent living difficulty	2,550	3.51%	168,656	3.93%

- b. *Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges for the jurisdiction and region.*

Information from HUD Map 15 does not suggest that geographic patterns significantly based on the type of disability a person has or the age of that person. There are smaller percentages of people with disabilities living in Somerville than in the region.

Table 14 - Disability by Age Group				
	(Somerville, MA CDBG, HOME, ESG) Jurisdiction		(Boston-Cambridge-Newton, MA-NH CBSA) Region	
Age of People with Disabilities	#	%	#	%
age 5-17 with Disabilities	217	0.30	37,062	0.86
age 18-64 with Disabilities	3,188	4.39	231,345	5.39
age 65+ with Disabilities	2,693	3.71	197,644	4.60

2. Housing Accessibility

- a. *Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.*

According to the Massachusetts Department of Developmental Services, in Massachusetts there is a severe lack of affordable, accessible housing stock to meet the needs of people with developmental disabilities. In 2014, a Massachusetts resident with a disability receiving SSI would have to pay 121% of their monthly income on average to rent a one-bedroom unit. Independent Living Centers in Massachusetts receive more requests from consumers seeking housing than for any other issue.

The 2015 Somerville Housing Needs Assessment reported that only 5.8% of housing in Somerville was built after 1990. The Fair Housing Act requires that multifamily housing of more than 4 units built after March 13, 1991 abide by design and construction requirements. Due to the age of Somerville’s housing stock, few units meet this criteria. *This puts added pressure on units in Somerville that were specially built to be accessible.*

According to Somerville Housing Authority (SHA) data, there are 30 federally funded units for households with accessibility needs (AN) and all are currently occupied by families with those needs. There are 12 state-assisted units; 10 of which are units occupied by families with AN and two units are occupied by families that have signed an agreement that requires them to move if the unit is needed by a new family chosen off of the wait list (a list of names of people waiting for public housing). There are 38 Section 8 MOD units in Somerville, 32 of which are occupied by families that have AN and six of which are occupied by families that have signed relocation agreements. Capen Court, another publicly subsidized accessible building, has 20 units, all of which are filled by those who have AN.

Each public housing development managed by SHA has a waitlist with specific priorities. When an accessible unit becomes available, SHA staff select a family from the waitlist whose needs are appropriate to the unit.

SHA itself does not provide direct services, but can refer incoming tenants to area providers who can support the tenants' daily independent living. SHA Resident Services staff follow up and make home visits to assure the well-being of tenants.

People with disabilities may also be referred to nonprofits that provide housing services through the Massachusetts Department of Developmental Services (DDS) or the Department of Mental Health (DMH). These programs tend to provide wraparound services for clients based on need and often own or lease group homes or provide sponsor-based subsidies with landlords.

Agencies that provide services for people with disabilities noted that the two greatest barriers to accessing housing were the prohibitive cost and the availability of housing.

b. Describe the areas where affordable accessible housing units are located. Do they align with R/ECAPs or other areas that are segregated for the jurisdiction and region?

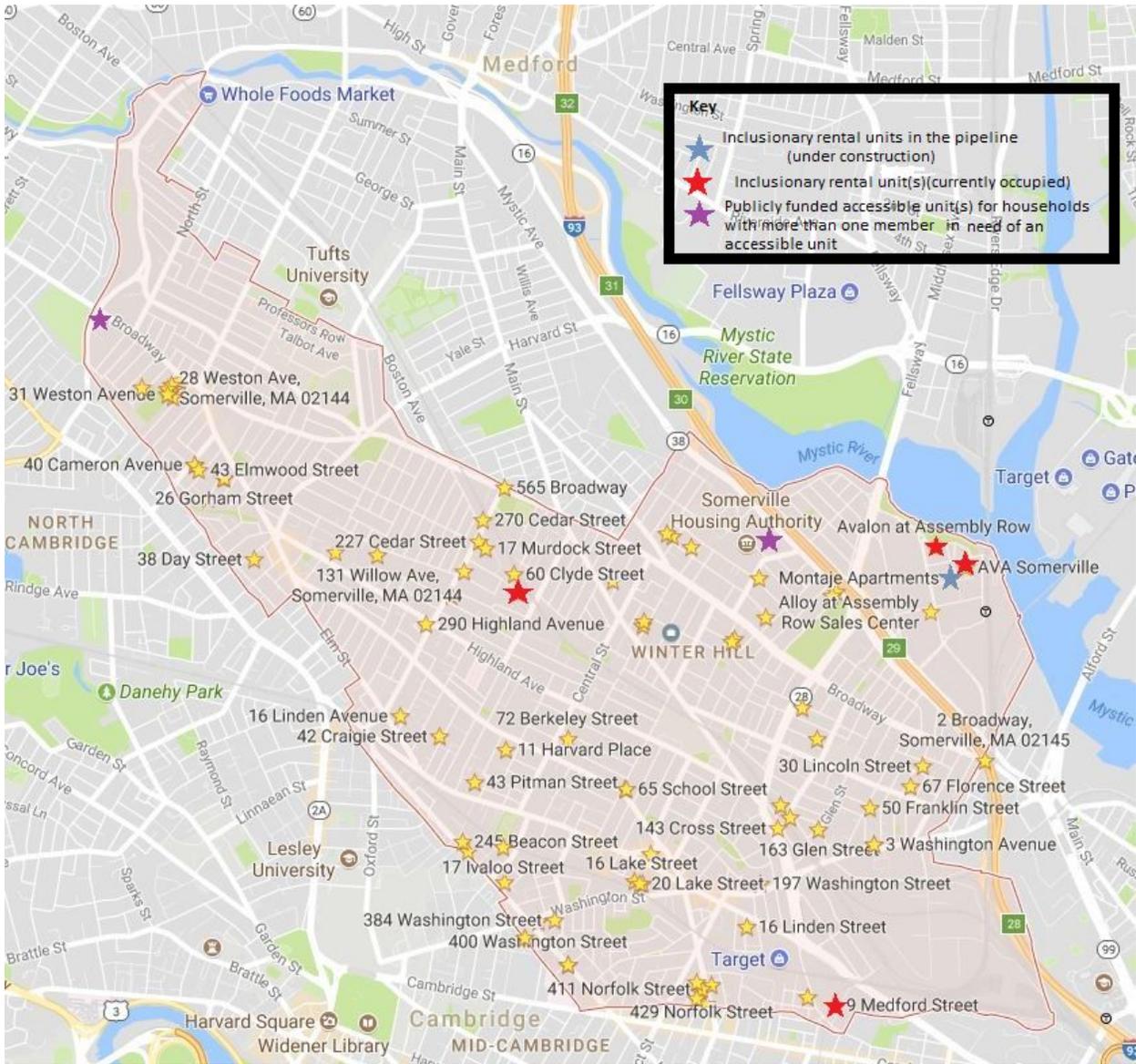
Affordable accessible housing units for single tenants are scattered throughout the City, but units for families with one or more members in need of accessibility options are found in only two housing developments: in East Somerville (Mystic) and at Clarendon Hill Towers, as seen in the map below. However, with access to vouchers and to state funded nonprofits, individuals and families can live in other parts of the City.

The Inclusionary Zoning Ordinance has generated the development of affordable and accessible rental units in the City. To date, 13 inclusionary rental units have been constructed out of a total of 120 inclusionary rental units. Those provided consist of a mix of studios, 1 BR, 2 BR and 3 BR units at both 50% and 80% AMI, as seen in the table below 46% of all units provided are 2 BR units. Additionally, there are 4 accessible units currently under construction at Montaje in Assembly, three disabled accessible and one hearing impaired, three are 1 BR and one 1 BR units. They are not included in the table below because they are under construction; however, a gray star depicts their location on the map below.

Inclusionary Accessible Units	
Unit Type	No. Of Units
Studio	1
1 BR	5
2 BR	6
3 BR	1

Total	13
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Source: City of Somerville's Housing Division, Current as of 10/3/2017



Location of Accessible Units, Source: Google Maps

c. To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing for the jurisdiction and region?

Roughly thirty two percent (31.87%) of persons with disabilities who live in publicly supported housing use HUD's Housing Choice Voucher Program, 30.81% live in public housing, and 22.22% live in Project-Based Section 8 housing. There is no HUD data provided on "Other Multifamily" units in Somerville. In the region, 35% of people with disabilities who live in publicly supported housing live in

public housing, 17.69% live in Project-Based Section 8, and 10.97% live in Other Multifamily. There is no data for the Housing Choice Voucher program for people with disabilities in the greater region.

Table 15 - Disability by Publicly Supported Housing Program Category		
(Somerville, MA CDBG, HOME, ESG) Jurisdiction	People with a Disability	
	#	%
Public Housing	179	30.81%
Project-Based Section 8	238	22.22%
Other Multifamily	0	0.00%
HCV Program	239	31.87%
(Boston-Cambridge-Newton, MA-NH) Region		
Public Housing	8,137	35.78%
Project-Based Section 8	6,193	17.69%
Other Multifamily	330	10.97%
HCV Program	N/a	N/a

3. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

- a. *To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?*

According to the HUD Mapping Tool, people with disabilities tend to be scattered around the jurisdiction. People with disabilities have the choice of living in housing specifically for people with disabilities or in integrated units with outside supports if necessary⁴.

- b. Describe the range of options for persons with disabilities to access affordable housing and supportive services in the jurisdiction and region.*

In Somerville and regionally, individuals with disabilities have similar options to other populations when looking for housing. There is also an additional set of subsidy options; the Alternative Housing Voucher Program (AHVP) provides housing vouchers for renters who are low-income and have disabilities. Subsidized housing is also available specifically for elders or people with disabilities who are low-income. Subsidized supportive housing is also available for clients of the MA Department of Mental Retardation (DMR), clients of the Department of Mental Health (DMH), elders, and for those with HIV or AIDS. It is to be noted however, that while those with disabilities qualify for these subsidies, the housing stock in Somerville is such that these options and subsidies do not unlock the same number of units for those with disabilities as they would for an individual/family without disabilities.

Public subsidized housing units are operated by the Somerville Housing Authority and privately subsidized housing units are operated by private management companies funded through MassHousing, HUD, and the Massachusetts Department of Housing and Community Development (DHCD). AHVP vouchers are obtained through DHCD. As of March 2016, there were 439 AHVP subsidies under lease in Massachusetts. DMR also provides some residential programs for individuals with cognitive disabilities. Units for disabilities tend to be integrated into mainstream housing and residents often arrange supports on their own or with help from an advocate. Some non-profit agencies manage housing for people with disabilities with on-site services and some public housing authorities in Massachusetts offer congregate living situations for people with disabilities⁵.

The Housing Options Program provides rental assistance and supportive services in greater Boston for approximately 250 disabled adults including individuals with intellectual or developmental disabilities, brain injuries, and mental illness who are homeless or at risk of homelessness. DHCD, the Executive Office of Health and Human Services, Massachusetts Rehabilitation Commission, Department of Mental Health and Department of Public Health are all collaborating agencies on this initiative.

Autism Housing Pathways, a non-profit providing services in the Greater Boston Area, provides information, support and resources for families looking for supportive housing options for their adult children with disabilities. A Housing Connector database is also available to match family members seeking housing situations for their adult children on the Massachusetts Families Organizing for Change website.

The Massachusetts Accessible Housing Registry (known as Mass Access) is an online database of affordable and/or accessible housing units for rent or sale in Massachusetts that is administered by

⁴ Housing Search Guide for People with Disabilities in Massachusetts. CHAPA. https://www.chapa.org/sites/default/files/sdfasdfsaf_2.pdf

⁵ Ibid.

Citizens' Housing and Planning Association (CHAPA). It currently lists 3,000 accessible apartments, 6,243 affordable apartments, 1,296 tax credit apartments, 2,045 accessible and affordable units, and 417 accessible moderately affordable units. However, many units do have waitlists. HUD also provides an affordable apartment search database of subsidized rental housing with provider agencies and housing management companies.

Finally, the Massachusetts Department of Developmental Services (DDS) provides residential services including group homes and shared living arrangements to its clients.

<http://www.mass.gov/anf/docs/mddc/2017-state-plan.pdf>

4. *Disparities in Access to Opportunity*

- a. *To what extent are persons with disabilities able to access the following in the jurisdiction and region? Identify major barriers faced concerning:*

i. Government services and facilities

The City of Somerville has developed, adopted, and begun implementing an Accessibility Transition Plan, which calls for making reasonable accommodations to ensure that City buildings are more accessible for those with physical disabilities. High on the list for adaptation are City Hall Annex, where the Housing Division offices are located, and the Somerville Traffic and Parking Office. The elevator at the Annex has frequent breakdowns, while the lift at the Somerville Traffic and Parking Office is also of limited usefulness as it cannot be operated by the person being lifted. All materials are available in multiple formats upon request.

ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

As with many older built environments, Somerville's public infrastructure, in many cases, provides only limited accessibility to people with disabilities.

An *Accessible Pedestrian Signal Supplemental Study* conducted in Somerville in 2014 encompassed a total of 309 Accessible Pedestrian Signals (APS) that were inventoried throughout the City. If the APS had either a tactile arrow or audible tone, but failed to meet other guidelines, it was considered partially compliant. If none of the guidelines were met (no tactile arrow or audible tone), it was considered non-compliant. The majority of the APS' in Somerville were found to be non-compliant (85%); 7% were partially compliant, and 8% fully compliant.

A *2013 Pedestrian Accessibility Study*, found that approximately 77% of Somerville sidewalks do not comply with Massachusetts Architectural Access Board (MAAB) requirements and that 60% of sidewalk area requires full replacement. It was also determined that 2,428, or 80% of the total ramps in Somerville, were likely not compliant with MAAB standards.

iii. Transportation

Most of the public transportation infrastructure in the region is concentrated in and around metropolitan Boston. The Massachusetts Bay Transit Association (MBTA) is the provider for public transportation in the Greater Boston Area. All MBTA buses are accessible, as are each of the MBTA Red Line and Orange Line stations in Somerville. However, some T stations on other lines and in other parts of the Metro Boston Area are not accessible. This may inhibit some residents from easily reaching certain locations. Accessibility is particularly limited on older sections of the Green Line in certain parts of Boston, Brookline and Newton. Many older Green Line trains in the MBTA fleet have stairs at every trolley car entrance, and require passengers with wheeled mobility devices to board using a mobile lift or a bridgeplate. Newer Green Line trolley cars have low floors and built-in bridgeplates, and are designated with Symbol of Accessibility (ISA) buttons. The MBTA offers reduced fares and monthly passes for passengers with disabilities, and free passage to blind passengers.

The MBTA's RIDE paratransit service provides door-to-door transportation for eligible residents, however, it has been noted by residents that eligibility is restrictive and complicated. Eligibility is limited to those who cannot use fixed-route transit all or some of the time because of a physical, cognitive, or mental disability. Passengers pay a \$3 fare for advance reservations and \$5 for same day service. Personal Care Attendants ride free of charge, and guests are charged the \$3 or \$5 cost. Over the last several years however, complaints regarding the RIDE have significantly increased, including concerns about reliability and service area changes. Door2Door is a non-profit that provides transportation services for the elderly population and people with disabilities. These services must be scheduled 24 hours in advance and include wait times on both ends of a journey, and are thus not a preferable mode of transportation for many residents.

iv. Proficient schools and educational programs

Students with disabilities have the choice of receiving services all over the district and can receive resources at any school. However, those with higher levels of need are assigned to certain schools where specific programs and the appropriate resources are available. Buses are provided for those who attend other schools due to special needs such as a disability. Children with IEP's (individual education plans) often have door to door transportation provided, depending on need, while other children walk to the school closest to their home and are then bused to their school.

v. Jobs

The MA Rehabilitation Commission (MRC) and the MA Commission for the Blind (MCB) provide vocational rehabilitation (VR) services for the Commonwealth of Massachusetts. People with disabilities may also be able to access services through referral to agencies that provide employment services. DDS adopted an Employment First Policy in 2010, establishing integrated employment as a preferred service option for working aged adults with disabilities. In 2014 DDS began its Employment Blueprint Initiative in conjunction with the Association of Developmental Disabilities Providers and the Arc of Massachusetts. This program seeks to increase employment opportunities for people with disabilities that

are integrated into the community. The integrated employment rate in MA for 2014 for state ID/DD agencies was 36%. In Somerville, 64.1% of disabled adults are not in the labor force, compared to 19.8% of the nondisabled⁶. The 2015 Somerville Housing Needs Assessment noted that the poverty rate for disabled adults (24.5%) is nearly twice that of nondisabled adults (13.3%).

- b. Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.*

Both the City of Somerville and regional housing providers are required to accept, review, and grant (when appropriate) requests for reasonable accommodations. Requests may be submitted to a landlord or property manager and if issues arise the tenant can then pursue a claim with the Fair Housing Commission or the Massachusetts Commission Against Discrimination of the Department of Housing and Urban Development. Individuals who need auxiliary aids for effective communication or any other reasonable accommodation are invited to make their needs known to the City’s Manager of Diversity, Equity, and Inclusion. Complaints and requests may be made online on the City’s website or by contacting the Manager of Diversity, Equity, and Inclusion directly.

The Somerville Housing Authority will also provide reasonable accommodations to those who utilize their services. SHA’s Reasonable Accommodation Policy states that: “The accommodation must be requested unless the need for such accommodation is readily apparent or otherwise known to the SHA. Any request may be made orally or in writing, may be made at any time, and may be made by an applicant, tenant or household member and/or anyone acting on their behalf. The SHA shall make available to the requester a reasonable accommodation form but the request does not have to be in any particular form nor do the words “reasonable accommodation” need to be used. Upon request, the SHA shall provide assistance to the person in completing the form.”⁷

- c. Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities in the jurisdiction and region.*

There is no data available in Somerville or regionally on the difficulties experienced by people with disabilities when trying to achieve homeownership. Housing costs in Somerville and the region, as noted throughout this document are already high and continuing to rise. Most people with disabilities live on limited incomes, and are not actively employed. Homeownership prospects for those with limited incomes are extremely limited.

5. Disproportionate Housing Needs

- a. Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities in the jurisdiction and region.*

⁶ Somerville Housing Needs Assessment, December 2015.

⁷ Somerville Housing Authority Reasonable Accommodation/Modification Policy and Procedures. <http://sha-web.org/documents/policies/reasonableAccommodation-ModificationPolicyAndProcedure.pdf>.

People with disabilities have a disproportionate housing need because they often need special accommodations and there are limited units that are accessible. Somerville is a built environment with an aged housing stock which can limit the housing options available.

6. Additional Information

- a. *Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region including those affecting persons with disabilities with other protected characteristics.*

The percentage of people with disabilities living below the poverty line in Massachusetts is 27.5%, whereas for those without disabilities the percentage living below the poverty line is 9.1%⁸.

- b. *The program participant may also describe other information relevant to its assessment of disability and access issues.*

The Americans with Disabilities Act (ADA) is a civil rights law that prohibits discrimination against individuals with disabilities in all areas of public life. Somerville recently hired a new Manager of Diversity, Equity, and Inclusion who acts as the staff representative for the Somerville Commission for Persons with Disabilities. As outlined in their website, the SCPD is “committed to promoting equality, to ensuring that the ADA’s vital protections for individuals with disabilities are preserved, and to advancing the basic freedoms that all Somerville residents deserve.” The SCPD’s purpose is to ensure that there is no discrimination or harassment based on disability in the City, and that businesses and residents follow the ADA as well as other state and federal disability laws.

The City also maintains a Transition Plan in an effort to ensure that all ADA laws and Section 504 of the Rehabilitation Act are being followed. It details the City’s policies and procedures in regards to compliance with ADA and other relevant disability laws. The Plan provides a roadmap for continued improvements and is updated and published on a yearly basis and made available to the public.

Participants in the WINS focus groups noted that many Somerville businesses have steps leading up to their storefronts or have very limited space inside, making them inaccessible to people in wheelchairs. When building accessible units, the surrounding neighborhood should also be taken into account.

7. Disability and Access Issues Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.

⁸ Ibid.

- **Access to publicly supported housing for persons with disabilities:** Somerville does not currently have an allocation of AHVP vouchers.
- **Inaccessible public or private infrastructure:** As noted in the section above, public infrastructure is often inaccessible for people with limited mobility due to Somerville’s historic built environment and steep terrain.
- **Lack of affordable, accessible housing in range of unit sizes:** The need for housing is much higher than the availability. The cost of housing in Somerville is oftentimes prohibitive for people with disabilities. There is a particular lack of units with 2 or more bedrooms for people who need in-home help.
- **Lack of affordable, integrated housing for individuals who need supportive services:** Nonprofit organizations that provide housing services for people with disabilities can face “NIMBYism” when looking for new properties to rent for group homes.
- **Location of accessible housing:** Accessible housing for families is restricted to Mystic and Clarendon Hill Towers. However, there are also accessible income-restricted units in a range of types located in Ava, Avalon, Maxwell’s Green and Millbrook Lofts available to households with incomes at or below 50% and 80% AMI.
- **Standards for approving reasonable accommodation requests:** A local community social worker shared her client’s experience on the WINS Survey in which the client was discouraged from applying for a reasonable accommodation as she was told that she “didn’t look disabled.” The social worker expressed the need for increased awareness/education of disabilities that are not immediately apparent and impedes the client’s ability to access suitable housing.

E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

1. *List and summarize any of the following that have not been resolved: a charge or letter of finding from HUD concerning a violation of a civil rights-related law, a cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law, a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law, or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.*

There have been no issues of civil rights violations noted or reported.

2. *Describe any state or local fair housing laws. What characteristics are protected under each in addition to the federal Fair Housing Act,*

Massachusetts has enacted additional protections against housing discrimination. The Massachusetts Antidiscrimination Law, [M.G.L. c. 151B](#), prohibits discrimination in advertising, public housing, and actions taken by realtors, landlords, mortgage lenders and brokers.

[M.G.L. c. 111, s. 199A](#) prohibits landlords from discriminating against families with children under the age of six because a unit does or may contain lead paint. Landlords have an obligation to abate lead. The

cases of elevated blood lead levels among children in Somerville have declined from 5.17% in 2001 to 1.01% in 2013 (three-year average estimates) (MA DPH, Registry of Vital Records and Statistics). In Somerville, 57 units of Somerville housing have been de-lead since 2012, through city grant funding from the federal government. Somerville was awarded continued funding to support lead abatement in July, 2017.

Under these state laws, it is also illegal to discriminate against someone in the sale or rental of housing because of a person's membership in one of the following protected classes: race, color, religious creed, national origin, ancestry, sex, marital status, veteran status, age, handicap/disability, gender identity, sexual orientation, public assistance, children/lead paint, public assistance recipient (e.g. Section 8 voucher holder or MRVP voucher holder).

- 3. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.*

Somerville Housing Division staff and the Somerville Fair Housing Commission (FHC) receives and refers complaints about possible fair housing violations and works to prevent them. The Somerville FHC is composed of five City residents appointed by the mayor for three-year terms as volunteers. Members must include a City or Housing Authority employee, a representative of a nonprofit community-based organization, a local realtor or lender, a low or moderate income tenant, and a person with substantial civil rights experience. The Commission was established by City ordinance in 1985. Its powers and duties include receiving complaints about possible fair housing violations and providing information and assistance, including fair housing referrals to the Massachusetts Commission Against Discrimination (MCAD), Fair Housing Center of Greater Boston and Cambridge and Somerville Legal Services (CASL). Additionally the FHC undertakes activities to increase the understanding of tenants, homeowners, landlords, realtors and lenders regarding their rights and responsibilities under state and federal fair housing laws. These activities include developing educational materials and conducting trainings and community outreach.

One annual long standing activity that promotes goodwill and may mitigate housing discrimination somewhat is an annual “April is Fair Housing Month” poster contest in Somerville elementary schools.

Regionally, the City of Somerville frequently accesses advice and support from CASL and the Fair Housing Center of Greater Boston. Cambridge and Somerville Legal Services (<https://www.gbbs.org/our-work/cambridge-somerville-legal-services>) has provided free legal assistance to low income families and individuals residing in Cambridge, Somerville, Arlington, Belmont, Woburn, and Winchester for over 40 years and receives funding support from the City’s Affordable Housing Trust Fund as well as ESG funds for homelessness prevention. The Fair Housing Center of Greater Boston (<http://www.bostonfairhousing.org/>) challenges illegal discrimination through training, community outreach, testing, case advocacy, public policy advocacy, housing counseling, and research. Metropolitan Boston Housing Partnership (MBHP), recently changed their name to Metro Boston Housing (<http://mbhp.org/?content=fair-housing&a=1756&cl=c1d1e6>). Metro Boston Housing serves households in 32 communities throughout the region in providing rental housing voucher assistance. Moreover, their

Senior Advisor on Civil Rights and Fair Housing and Fair Housing Advocate provide fair housing trainings and take referrals from Program Representatives administering vouchers as well as other community organizations working with tenants who encounter fair housing violations while searching for a home. The Housing Discrimination Testing Program housed at Suffolk University works with Boston's Fair Housing Commission on testing, enforcement and education (<http://www.suffolk.edu/law/academics/59759.php>).

4. Additional Information

- a. *Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.*

As was observed in regard to the WINS public engagement process, most residents of Somerville do not know how to report a fair housing violation, nor are they aware of organizations in the City that provide services around fair housing issues. Residents also expressed concern that; as an organization comprised of volunteers, the Fair Housing Commission lacks the capacity needed to respond to pressing issues in an effective manner.

- b. *The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.*

There is no additional information to provide.

5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing enforcement, outreach capacity, and resources and the fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

- **Lack of local private fair housing outreach and enforcement:** As noted previously, there is limited capacity for the Fair Housing Commission's volunteer members to engage in outreach and enforcement, given their volunteer status. The majority of Somerville residents responding to the WINS Survey reported not knowing how to report a fair housing issue.
- **Lack of education of fair housing laws and tenant/landlord rights:** Participants in the City of Somerville's community engagement events expressed a lack of knowledge about identifying housing discrimination and how to report it. Tenants reported being afraid that their landlords will retaliate.
- **Lack of resources for fair housing agencies and organizations:** The Fair Housing Commission is unpaid and therefore inherently limited in the resources it has.

VI. Fair Housing Goals and Priorities

1. For each fair housing issue analyzed in the Fair Housing Analysis section, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.

2. For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Using the table below, explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.

Priorities

Priority 1: High Priority - Significant factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance and that are within the control or direct influence of the City of Somerville.

Priority 2: Moderate Priority - Other significant factors that are within the control or direct influence of the City of Somerville

Priority 3: Lower Priority - Significant factors beyond the direct control of the City of Somerville.

Segregation and Integration

Contributing Factor	Priority	Justification
Displacement of residents due to economic pressures	1	This is an area that the City of Somerville and community partners can influence.
Private discrimination	3	Significant factors beyond the direct control of the City and its partners.
Type and location of affordable housing units	1.5	This is an area that the City of Somerville and community partners can influence- however there are some restrictions as to the power of that influence.
Language Barriers	1	This is an area that the City of Somerville and community partners can influence.

Goal #1	Build on current efforts to preserve naturally occurring affordable units and other multi-unit properties alongside increasing awareness/advocacy, education, programming, and training in an effort to foster a well-rounded approach to addressing the need for affordable housing in its entirety.
Contributing Factor(s) Addressed	Displacement of residents due to economic pressures
Discussion	<p>The majority of Somerville residents identified displacement from increased housing prices as the number one contributing factor to fair housing issues, according to data collected from community engagement efforts. Those who cannot afford to live in Somerville tend to move into surrounding communities. Conversations with community organization staff members indicated the prevalence of tenant displacement as a result of landlords increasing rent prices. Plans of the Green Line extension will likely further exacerbate displacement of residents. There is little incentive for landlords to maintain rents at low, affordable levels in such a hot real estate market.</p>
Metrics, Milestones and Timeframe for Achievement	<ul style="list-style-type: none"> ● Milestone: Create affordable housing opportunities across neighborhoods by funding tenant rental assistance programs and landlord leasing differential programs. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Meet goals for the number of households securing new housing that is affordable based on their income and the number of households who are stabilized and retain their existing housing, including goals to secure tenancies in all neighborhoods. ■ Continue to fund work of the Somerville Homeless Coalition programs that provide financial stabilization assistance and a housing subsidy for up to two years to low income households and case management services. ○ Timeframe: Annual awards through RFP process for the Tenancy Stabilization Program through the Somerville Affordable Housing Trust Fund are based on past program performance. ● Milestone: Establish a ‘right to purchase’ program that would allow tenants/3rd party nonprofit developers the right to purchase a property before it goes on the market in an effort to preserve the properties affordability. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Tracking state legislation that would enable City to enact a local option tenant’s right to purchase. ○ Timeframe: Bill referred to committee on housing January 2017, ongoing through legislative process.

Goal #2	Provide support to tenants in an effort to educate regarding fair housing law and protect against discrimination based on race, nationality, familial status, etc. and incentivize developers/property owners to build/maintain more affordable housing in alignment with fair housing laws and tenant protections.
Contributing Factor(s) Addressed	Private Discrimination
Discussion	Nearly half of respondents in the WINS Survey indicated private discrimination as a contributing factor to fair housing issues in Somerville. Respondents also reported that segregation in Somerville exists based largely on race, receiving some form of public assistance, languages spoken/accents, and familial status.
Metrics, Milestones and Timeframe for Achievement	<ul style="list-style-type: none"> ● Milestone: Increase awareness and education to landlords and tenants in order to impart awareness of fair housing law and, prevent discrimination. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Public awareness/education campaign; ■ Increased visibility of Fair Housing Commission’s efforts through publications on the City’s website as an initial step. ○ Timeframe: Fall 2017; Winter 2018.
Goal #3	Work toward new construction, including affordable housing, being distributed throughout Somerville in alignment with the Somervision plan and the City’s zoning overhaul that is currently being drafted.
Contributing Factor(s) Addressed	Location and type of affordable housing Displacement of residents due to economic pressures
Discussion	According to the WINS Survey, most residents believe that subsidized, affordable housing is concentrated in certain neighborhoods, including East Somerville and Winter Hill, and is located less frequently in West Somerville. Somerville’s greatest potential for residential (and other) growth is in what are known (under the draft zoning overhaul proposal) as “transformative zones”, where housing previously has not been a permitted use. Much of that growth is projected for Union Square, toward the City’s southern border.
Metrics, Milestones and Timeframe for Achievement	<ul style="list-style-type: none"> ● Milestone: Housing production will be tracked in an ongoing manner through the City’s “SomerVision Tracker” database. Affordable housing units are tracked by census tract and zip code. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ A projected housing production of 6,000 new housing units including 1,200 permanently affordable units (20%).

	<ul style="list-style-type: none"> ■ These units will mostly be built in “transformative” zones as designated in SomerVision. A mix of both affordable and market rate units will be built in these areas. ○ Timeframe: SomerVision Tracker is updated every 6 months. By 2030 as established by the City’s SomerVision comprehensive plan.
Goal #4	Continue to provide direct access to housing resources to people who speak languages other than English.
Contributing Factor(s) Addressed	Language barriers Immigration status
Discussion	Economic displacement and segregation disproportionately affect persons with limited English proficiency. During the community engagement process, residents explained that immigrants or non-english speaking residents who move into Somerville tend to move close to their peers who speak the same language. By increasing the information available in multiple languages, other parts of the City will be made more accessible to immigrants and those who do not speak English.
Metrics, Milestones and Timeframe for Achievement	<ul style="list-style-type: none"> ● Milestone: Currently, the City offers bilingual 311 Services and has a team of three SomerViva Community Liaisons who take the lead in community engagement efforts with immigrant and Limited English Proficiency (LEP) communities. They also serve as interpreters and translators in Portuguese, Spanish and Haitian Creole. The City is working to formalize this practice by creating a Language Assistance Plan (LAP) to continue facilitating City communication with residents of limited English proficiency. <ul style="list-style-type: none"> ○ Metric: <ul style="list-style-type: none"> ■ Research best practices in language assistance plans. ■ Consult and convene City staff to draft the document. ■ Establish a staff person as the official Language Assistance Plan Officer. ■ Publish and publicize the LAP on City’s website and ensure it’s available in LEP languages. ■ Implement Language Assistance Plan. ■ Train remaining forward-facing City Departments on its use. ■ Track data and revise as necessary. ○ Timeframe: Report findings by the end of 2018 with a list of possible working group members, first draft available mid-2019, finalize and release by the end of 2019, implement plan in early 2020, ongoing tracking and revising. ● Milestone: The Housing Division, Office of Communication & Community Engagement, the Department of Health & Human Services will continue to work

together to ensure information regarding affordable housing programs is disseminated throughout the City especially in LEP areas and in multiple languages.

- Metric:
 - SomerViva, the Housing Division and the City's social worker will continue to offer one-to-one language support in navigating City services, programs and counseling on affordable housing in general.
 - The City's 311 Office will continue to have bilingual staff to answer questions and connect Somerville residents to services in their language.
 - The Mayor's Office of Communications will continue to schedule ResiStat meetings in top LEP languages and locations.
 - Communications, Housing, and Health & Human Services departments will work together to create videos in LEP languages describing City programs and affordable housing opportunities.
 - To ensure equal opportunity to affordable housing units and information, the Housing Division and SomerViva will work together to release ads in all languages at the same time.
 - SomerViva will continue to share in-language City information via radio, TV, note boards, social media, SMS, churches, newspapers, etc.
 - Create a map/list of organization/places where ads should be placed to reach LEP community.
- Timeframe: A ResiStat meeting in Spanish will take place in November, 2017. Ongoing inter-departmental meetings can take place quarterly to facilitate the cross-departmental work in reaching Somerville's LEP communities.
- Milestone: The City will continue to fund and support the work of local non-profit agencies that provide access to housing search, financial counseling and assistance maximizing access to available benefits in languages other than English, such as the Massachusetts Alliance of Portuguese Speakers (MAPS).
 - Metric:
 - Identification of flexible and sustainable funding source for Somerville's Housing Support Programs in addition to public service grants through Community Development Block Grant funding, subject to availability of grant funding.
 - Timeframe: By the end of FY18, an RFP will be issued to continue past levels of support and will repeat annually.

Disparities in Access to Opportunity

Contributing Factor	Priority	Justification
Availability, frequency, reliability of public transportation	2.5	While there are some factors within the influence of the City and its partners, significant aspects of this contributing factor are beyond control.
Lack of training opportunities for low-wage workers, unskilled workers, and immigrant workers	2	Other significant factors that are within the control or direct influence of the City of Somerville.
Location of proficient schools and school assignment policies	2.5	While there are some factors within the influence of the City and its partners, significant aspects of this contributing factor are beyond control.
Location of environmental health hazards	2	Other significant factors that are within the control or direct influence of the City of Somerville.

Goal #1	Complete the Massachusetts Bay Transportation Authority's Green Line Extension (GLX) in order to better accommodate residents across Somerville, including students who are interested in attending schools outside of their neighborhood.
Contributing Factor(s) Addressed	Availability, frequency, reliability of public transportation Location of proficient schools and school assignment policies
Discussion	Many residents noted during community engagement efforts that more transportation is needed between North and South parts of the City and directly into Cambridge. Currently, public transportation runs most frequently and reliably from East to West. The extension of the Green Line will provide increased service area of the Massachusetts Bay Transportation Authority subway system.
Metrics, Milestones and Timeframe for Achievement	<ul style="list-style-type: none"> ● Milestone: Extension of Green Line projected to begin in 2017 will make 85% of Somerville land area within ½ mile distance of transit (OSRP 2016-2021) <ul style="list-style-type: none"> ○ Metric: <ul style="list-style-type: none"> ■ Station construction and completion. ○ Timeframe: Estimated completion date is in 2021.

Goal #2	Further develop, support, and continue to increase training opportunities/programs along with translation services for low-skilled workers/workers who speak limited English in conjunction with promoting policy changes and increasing awareness and advocacy efforts, ensuring the protection of the large immigrant population in Somerville.
Contributing Factor(s) Addressed	Lack of training opportunities for low-wage workers, unskilled workers, and immigrant workers
Discussion	A common theme that came out of community outreach efforts was the lack of well-paying jobs in Somerville to low-skilled workers, especially those that have limited English skills. Given the high population of immigrants in Somerville, it is essential to protect this vulnerable population and provide resources that will prevent immigration status from being a barrier to success in the community.
Metrics, Milestones and Timeframe for Achievement	<ul style="list-style-type: none"> ● Milestone: Continue to work towards the implementation of the Jobs Linkage fee, which would set up a trust fund for job creation, training and retention specifically for Somerville residents. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ A Nexus Linkage Report was completed during the Summer of 2017 which recommended raising the current Housing Linkage Fee and the creation of a Jobs Linkage Fee. ■ A Jobs Linkage Trust fund is targeted to be implemented by January 2018 and will manage revenue collected from the Jobs Linkage fee the City is currently working to establish. This revenue will be designated for job training, adult basic education, and English language education courses. ■ Timeframe: Early 2018. ● Milestone: Continue working towards establishing a Workforce Development Strategic plan which will guide the City in determining how to best utilize funds from the pending Jobs Linkage Fee, what industries/occupations/demographics to target for investment, and what role the City should play in regional workforce development. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Establishment of Steering Committee charged with guiding development of the strategic plan. ■ Workforce Development Strategic Plan established and implemented. ○ Timeframe: Workforce Development Strategic Plan implemented by first quarter of 2018.

	<ul style="list-style-type: none"> ● Milestone: Support industry specific training programs such as the Advanced Manufacturing Training Program and FabVille, Somerville's public fabrication laboratory, both housed in Somerville High School. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Connect residents to training programs. ■ Coordinate outreach efforts with Economic Development and training providers. ○ Timeline: Ongoing programs that will continue to provide services. ● Milestone: Continue to provide adult learning opportunities for English Language Learners (ELL), as well as GED prep and job training. Somerville Center for Adult Learning Experiences (SCALE) provides Adult Basic Education as well as ELL classes that are free of charge. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Number of students enrolled in programs ○ Timeframe: Ongoing programs and services. ● Milestone: Initiation of ‘One Somerville’ campaign and reaffirmation of Somerville as a Sanctuary City after 30 years as such. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Ongoing action regarding the protection of Somerville’s immigrant population. ■ Somerville School Committee passed resolution to “Affirm Somerville Public Schools as Safe and Welcoming for All Students” in March 2017. ■ Somerville Public Schools released ‘One Somerville’ resources for families that are translated into 14 languages. ● Timeframe: Ongoing efforts to ensure that the community remains united in efforts to maintain inclusivity.
Goal #3	Support ongoing efforts of Somerville Public Schools to develop new programs and policies that address equity within the school system.
Contributing Factor(s) Addressed	Location of proficient schools and school assignment policies
Discussion	The absence of a district-wide public school bus system in Somerville-one that has not been needed due to its compact size- creates a situation where the School Choice program is not adequate to provide equitable access to all students. However, SPS does not believe that a bus system will solve this issue, as self-segregation has been seen in neighboring communities as a result, and the high cost of transportation would force the SPS to cut spending in other areas. About 85% of new families get their first or second choice of school. Because of this, SPS is

	exploring multiple options in an effort to increase equity in our school system including transportation support to increase access to school-based programs.
Metrics, Milestones and Timeframe for Achievement	<ul style="list-style-type: none"> ● Milestone: Implementation of programs that provide after school transportation and increase equitable access to education and enrichment. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Language Builders Club pilot program launches 9/25/17 and will provide after school bussing at 5:00pm to 2nd graders in order to allow them to participate in afterschool programs. An after school shuttle bus to all middle schools is set to begin by the end of September 2017 will stop at all K-8 schools in order to allow middle school students to attend any available after school program regardless of what school hosts it. ○ Timeframe: Programs will be implemented by end of September 2017. Potential for further expansion ongoing as programs progress. ● Milestone: Begin process of researching enrollment patterns in order to elicit programmatic changes that allow for increased equity in school access. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Development of policy changes that work to provide equitable access to all SPS schools. ■ The Somerville Public School Department Cabinet annually convenes on this issue in an effort to further examine enrollment patterns to better address specific challenges being faced by the community. ○ Timeframe: Meetings will continue to take place in an effort to engage the community as well as SPS to address this issue. This is a community process that must continue in order to reach a viable solution.
Goal #4	Continue to pursue projects that create physical changes to Somerville’s landscape that reduce environmental health hazards.
Contributing Factor(s) Addressed	Location of environmental health hazards
Discussion	Supported evidence suggests that with two major highways including Route 93 and McGrath Highway running through East Somerville, exposure to environmental health hazards is especially high where residents in public housing live.
Metrics, Milestones and Timeframe for Achievement	<ul style="list-style-type: none"> ● Milestone: Continuation of McGrath Boulevard Project Development which aims to increase connectivity in a safe and comfortable manner for pedestrians, bikers, cars, and buses. This project will also have significant positive health and environmental impacts. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Preliminary design concept achieved and finalized. ○ Timeframe: Federal funding in the amount of \$90 Million will be available for this project in 2026, when construction will begin.

Disproportionate Housing Needs

Contributing Factor	Priority	Justification
Number and availability of affordable units in a range of sizes	1	This is an area that the City of Somerville and community partners can influence.
Displacement of residents due to economic pressures.	1	This is an area that the City of Somerville and community partners can influence.
Lack of housing support for victims of sexual harassment, including victims of domestic violence.	1.5	This is an area that the City of Somerville and community partners can influence- however there are some restrictions as to the power of that influence.
Land use and zoning laws	1	This is an area that the City of Somerville and community partners can influence.
Lending discrimination	2.5	While there are some factors within the influence of the City and its partners, significant aspects of this contributing factor are beyond control.
Inadequate access to information about housing opportunities and housing support programs	1	This is an area that the City of Somerville and community partners can influence.

Goal #1	Utilize current policies/programs and the zoning overhaul to expand housing supply via new development and preservation of existing housing.
Contributing Factor(s) Addressed	Number and availability of affordable units in a range of sizes Displacement of residents due to economic pressures
Discussion	There are not enough publicly supported units with more than one bedroom to meet the supply of families who need public housing. Waitlists for publicly supported housing are increasingly long, and residents are often forced to look outside of Somerville when they move.

<p>Metrics, Milestones and Timeframe for Achievement</p>	<ul style="list-style-type: none"> ● Milestone: Development of 25 new rental housing units for seniors funded by the City and being developed by Somerville Housing Authority. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Production of 25 rental housing units for seniors. ○ Timeframe: 2017-2018. ● Milestone: Approval of proposed zoning ordinance to allow development of more affordable units in the city. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Somerville’s Comprehensive Plan, SomerVision recommends that 85% of new development over the next 20 years should occur in areas of Somerville including the Inner Belt, Brickbottom and Boynton Yards. ○ Timeframe: Presentation of zoning overhaul draft to the Board of Aldermen in the Fall of 2017. Approval pending Board of Alderman vote. Redevelopment of these areas would extend to Year 2030.
<p>Goal #2</p>	<p>Expand current efforts to get as many units out of private, speculative market through acquisition and preservation of permanently affordable housing.</p>
<p>Contributing Factor(s) Addressed</p>	<p>Displacement of residents due to economic pressure Number and availability of affordable units in a range of sizes</p>
<p>Discussion</p>	<p>Affordability was the most present issue during our community engagement process. Residents are finding it harder and harder to live in Somerville due to rising rent costs. Middle income residents who do not qualify for housing assistance but cannot afford exuberant rent prices are perhaps most at risk of displacement.</p>
<p>Metrics, Milestones and Timeframe for Achievement</p>	<ul style="list-style-type: none"> ● Milestone: Continue to support the 100 Homes Program, which allows properties due to be sold to be acquired by the Somerville Communication Corporation in partnership with the City and turned into permanently affordable units before they are put on the market. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Goal to acquire 100 units, 7 properties creating 20 permanently affordable units acquired thus far. ○ Timeframe: Ongoing effort of SCC and City over next 3 years. ● Milestone: Provide transitional housing to at-risk and formerly homeless young adults <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Number of youth assisted by program on annual basis. ■ 9 young adults provided transitional housing for up to two years with ongoing case management in 2016.

	<ul style="list-style-type: none"> ○ Timeframe: Annual awards through RFP process are based on past program performance.
Goal #3	Leverage role of Sustainable Neighborhoods Coordinator and restructured Housing Division position in order to conduct critical research, project management, and analysis that will allow the Housing Division to continue to implement the full range of new policies, programs, and resources recommended by the Sustainable Neighborhoods Working Group.
Contributing Factor(s) Addressed	Number and availability of affordable units in a range of sizes
Discussion	The Sustainable Neighborhoods Initiative was launched in 2014 in an effort to address current housing challenges in Somerville, and yielded 18 recommendations developed by the Sustainable Neighborhoods Working Group. These recommendations are now in various stages of implementation or further study.
Metrics, Milestones and Timeframe for Achievement	<ul style="list-style-type: none"> ● Milestone: Work to implement policy recommendations developed by the Sustainable Neighborhoods Working Group in an effort to increase affordability of Somerville <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Implementation of 20% inclusionary housing requirement, completion of Real Estate Transfer Charge (RETC) Impact Analysis and Linkage Fee Nexus report; drafting of RETC Home Rule Petition for upcoming legislative session; redrafting of Condo Conversion Ordinance in progress. ○ Timeframe: Efforts ongoing, timing varies depending on recommendation.
Goal #4	Support the housing needs of our most vulnerable residents, including those who have experienced sexual and/or domestic violence and are in need of emergency housing services and support.
Contributing Factor(s) Addressed	Lack of housing support for victims of sexual harassment, including victims of domestic violence.
Discussion	A lack of affordable housing disproportionately impacts those who experience sexual and domestic violence. These individuals often need emergency support to leave unsafe living conditions and without an adequate housing supply they are restricted in their ability to leave abusive situations.

<p>Metrics, Milestones and Timeframe for Achievement</p>	<ul style="list-style-type: none"> ● Milestone: Continue to use rapid re-housing resources to help fund Respond- a nonprofit organization aimed at ending domestic violence and providing support to all survivors of domestic violence find safe, affordable housing. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Number of people transitioned to permanent housing following receipt of a housing subsidy. ■ Match or exceed the 60% of those receiving services that moved on to permanent housing in 2016. ○ Timeframe: Ongoing efforts to maintain relationship and funding.
<p>Goal #5</p>	<p>Explore new ways to expand the housing stock in Somerville by better understanding how our zoning ordinance can be revised to allow for more creation of affordable units.</p>
<p>Contributing Factor(s) Addressed</p>	<p>Land use and zoning laws</p>
<p>Discussion</p>	<p>Somerville’s zoning ordinance is three decades old and inordinately restricts development in several areas of the City where residential development is not allowed. The City is currently in the process of a zoning overhaul that addresses these issues.</p>
<p>Metrics, Milestones and Timeframe for Achievement</p>	<ul style="list-style-type: none"> ● Milestone: The proposed zoning code would “unlock” transformative areas such as the Inner Belt, Brickbottom and Boynton Yards to allow for significant development, including residential development. In addition, the proposed zoning ordinance would separate the cost of off-street parking from the cost of housing, helping to address parking as a major factor in housing costs. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Somerville’s Comprehensive Plan, SomerVision, recommends that 85% of new development over the next 20 years should occur in these areas. ■ A the revised draft of the new zoning ordinance is planned to be presented to the Board of Alderman in the Fall 2017. ○ Timeframe: Presentation of zoning overhaul draft to the Board of Aldermen in the Fall of 2017, approval pending Board of Alderman vote.
<p>Goal #6</p>	<p>Explore regional collaboration to better address the housing affordability and housing choice issues in the Greater Boston Region.</p>
<p>Contributing Factor(s) Addressed</p>	<p>Number and availability of affordable units in a range of sizes Displacement of residents due to economic pressures</p>

Discussion	Many of the housing affordability issues impacting Somerville are shared by many of our neighboring jurisdictions and the region in general. In order to best address these issues the Housing Division must connect with regional organizations to collaborate on solutions and ensure that we are working towards the same goals.
Metrics, Milestones and Timeframe for Achievement	<ul style="list-style-type: none"> ● Milestone: Connect with MBHP to support their housing workshops. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Create a joint outreach plan to promote trainings. ○ Timeframe: Fall 2017. ● Milestone: Continue regional collaboration with Metro Area Planning Council in an effort to gain a better understanding of housing demand <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Completion of Middle-Income Study currently to be conducted, which will allow the City to gain a better understanding of the demand and what type of housing is most needed for our population. ■ Completion of Rental Database study currently being conducted, which will create a tool that the City can use to track rental prices in real time. This data will allow us to see how and why rental prices shift, allowing the City to have a better understanding of the rental market and develop potential solutions to address the needs of the population. ○ Timeframe: Phase 1 completed, Phase 2 of Middle-Income study to be completed by October 2018. Rental Database study is expected to be completed October 2017.
Goal #7	Expand efforts to conduct outreach to all communities in Somerville in order to disseminate needed information regarding housing policies, programs and opportunities and provide referrals to other organizations as needed in order to connect people with available services.
Contributing Factor(s) Addressed	Inadequate access to information about housing opportunities and housing support programs
Discussion	In order to provide equal opportunities for all residents of Somerville to access housing opportunities, information must be made available in a variety of formats.
Metrics, Milestones and Timeframe for Achievement	<ul style="list-style-type: none"> ● Milestone: Enforce and monitor compliance with requirements for private developers to advertise affordable units (rental and homeownership) across all neighborhoods and in multiple languages for an extended period of time through city-approved affirmative marketing process including as lottery process for applicants. <ul style="list-style-type: none"> ○ Metrics:

	<ul style="list-style-type: none"> <ul style="list-style-type: none"> <ul style="list-style-type: none"> ■ Continue to include an affirmative marketing plan within the Affordable Housing Implementation Plan (AHIP) required to be executed by developers providing inclusionary units, prior to pulling a building permit. The affirmative marketing plan requires developers to place ads in both local and minority newspapers. The City’s SomerViva team translates the ad/flyer for city-wide distribution. Continue to retain copies of ads/flyers placed and translated. ■ Ensure affordable housing information is up to date and available on the City’s website in multiple languages. ○ Timeframe: Ongoing requirement, monitoring and compliance of affirmative marketing plan. By early 2018; complete revisions and updates to website with affordable housing information. ● Milestone: Direct the coordination of referrals to affordable housing opportunities and homelessness prevention or assistance programs through the Somerville Continuum of Care Coordinated Entry Program <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Direct funding to the Coordinated Entry program. ■ Meet goals of individuals and households who enter or make use of housing programs housing assistance, track demographics. ○ Timeframe: Program first to be funded in FY17, will be ongoing ● Milestone: Housing Division currently in process of recasting new position in order to increase outreach efforts and facilitate increased dialogue and communication with the Somerville community. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Increased outreach by new staff person. ■ New job description created and currently being reviewed by Personnel. ○ Timeframe: Staff hired in revised position by year end of 2017.
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Publicly Supported Housing

Contributing Factor	Priority	Justification
Source of income discrimination (Section 8)	1	This is an area that the City of Somerville and community partners can influence.
Admissions and occupancy policies and procedures, including preferences in publicly supported housing	2.5	While there are some factors within the influence of the City and its partners, significant aspects of this contributing factor are beyond control.

Land use- condo conversions remove needed rental units from the market.	1.5	This is an area that the City of Somerville and community partners can influence- however there are some restrictions as to the power of that influence.
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Goal #1	Work towards ending housing discrimination by increasing awareness/advocacy, education, programing and training.
Contributing Factor(s) Addressed	Source of income discrimination (Section 8) Private Discrimination Lending discrimination
Discussion	A common theme that was voiced in community engagement forums and surveys was the prevalence of discrimination based on public assistance. Landlords reportedly are often not willing to rent to voucher holders.
Metrics, Milestones and Timeframe for Achievement	<ul style="list-style-type: none"> ● Milestone: Explore collaboration with other departments and organizations, such as Somerville Housing Authority which works to provide similar services, in an effort to develop bi-annual housing workshops that provide information regarding tenant rights, strategies for housing search, resources for assistance, eviction, and other topics that arise through various community engagement efforts. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Organize meeting with partners to develop strategy to implement workshop series. ■ Begin community engagement process to develop workshop topics ■ Assess workshops series and adjust accordingly. ○ Timeframe: Begin planning process Winter 2018, with first workshop to be held in Summer 2018. ● Milestone: Create a list of resources and programs specific to property owners and post on City's website including City and regional resources <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Research resources for property owners. ■ Work with other City Departments as Divisions including Economic Development and the Communications Dept. to publicize resources. ■ Create a listserv for property owners. ■ Explore providing workshops similar to tenants or connect them to existing workshops/events in the community. ○ Timeframe: Develop additional resources for the website by Spring 2018.
Goal #2	Promote policy changes that will improve the experiences of those trying to access public housing.

Contributing Factor(s) Addressed	Admissions and occupancy policies and procedures, including preferences in publicly supported housing
Discussion	Many Somerville residents are struggling with long wait-lists for public housing. Findings from the Somerville Housing Needs Assessment and feedback from residents suggests that although publicly supported housing programs exist, typically all units are occupied with long waitlists, only limiting access to affordable housing.
Metrics, Milestones and Timeframe for Achievement	<ul style="list-style-type: none"> ● Milestone: Continued review of waitlist data and priorities by Somerville Housing Authority (as stated in 5 Year Plan created in 2014) to ensure that outdated applicants are removed from the list and allow focus on remaining applicants. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Review and purge of the waitlist annually. ○ Timeframe: 2014-2019.
Goal #3	Continue to strengthen knowledge and enforcement of condominium conversion ordinance, and, potentially, update ordinance itself.
Contributing Factor(s) Addressed	Land use- condo conversions remove needed rental units from the market.
Discussion	Some focus group attendees felt that condo conversions were driving up prices and taking affordable rental units off the market, thereby decreasing the likelihood that voucher holders are able to rent affordable units.
Metrics, Milestones and Timeframe for Achievement	<ul style="list-style-type: none"> ● Milestone: Continue to fund work of Cambridge and Somerville Legal Services (CASLS) through Cambridge Affordable Housing Trust to represent at-risk tenants. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ CASLS funded through annual application process; ■ Drafting of revised condominium conversion ordinance. ○ Timeframe: CASLS funded on annual basis. ● Milestone: Explore feasibility to changes in condo conversion ordinance. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Currently pending litigation based on discussion of revisions to Condominium Conversion Ordinance among Board of Aldermen occurred in March 2017. ○ Timeframe: Condominium conversion ordinance revisions consideration mid-2018.

Disability and Access Issues

Contributing Factor	Priority	Justification
Access to publicly supported housing for persons with disabilities	2	Other significant factors that are within the control or direct influence of the City of Somerville.
Location of accessible housing in range of unit sizes	2	Other significant factors that are within the control or direct influence of the City of Somerville.
Inaccessible public infrastructure (sidewalks)	2	Other significant factors that are within the control or direct influence of the City of Somerville.
Standards for approving reasonable accommodation requests	2	Other significant factors that are within the control or direct influence of the City of Somerville.
Lack of supportive services paired with specific affordable housing opportunities	2	Other significant factors that are within the control or direct influence of the City of Somerville.

Goal #1	Implement the City of Somerville’s adopted Americans with Disabilities Act (ADA) Title II multi year Transition Plan to improve accessibility to all city buildings, programs, services, roadways and sidewalks.
Contributing Factor(s) Addressed	Inaccessible public infrastructure (sidewalks)
Discussion	The City of Somerville is obligated by both federal and Massachusetts laws and regulations to uphold and protect the rights of individuals with disabilities. The City of Somerville hired the Institute for Human Centered Design (IHCD) to assess the current level of ADA compliance in all of its programs, services activities and city-owned facilities. In order to ensure that the city complies with all disability laws and to promote an environment free of discrimination and harassment for individuals with disabilities, the City is putting forth a multiyear ADA Transition Plan.

<p>Metrics, Milestones and Timeframe for Achievement</p>	<ul style="list-style-type: none"> ● Milestone: Complete barrier removal projects in seven of the City’s municipal buildings, the Public Safety Building, five fire stations, three libraries, nine schools, twenty-one parks, seventeen playgrounds, thirteen parking lots, the Somerville Public Schools Central Administration Office, several unoccupied buildings. Additionally, barrier removal projects will be completed at sites leased by the City for office space and recreation including the Tufts Administration Building, the Ralph and Jenny/Lyons Club building and at least four facilities owned by the Massachusetts Department of Conservation and Recreation (DCR) and operated by the City for athletic and recreational programming. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Removal of barriers to access for persons with disabilities as identified in IHCD’s city assessment. ○ Timeframe: 2015-2036.
<p>Goal #2</p>	<p>Provide a resource list to residents with affordable units including descriptions on accessibility features like wheelchair accessible parking, ramps, elevator access, etc.</p>
<p>Contributing Factor(s) Addressed</p>	<p>Access to publicly supported housing for persons with disabilities</p>
<p>Discussion</p>	<p>Accessible publicly funded housing for families is restricted to Mystic and Clarendon Hill Towers, limiting the options of where families who have a member with a disability can live.</p>
<p>Metrics, Milestones and Timeframe for Achievement</p>	<ul style="list-style-type: none"> ● Milestone: Provide access to list of affordable and accessible homes and other relevant resources on the Somerville website. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Provide Mass Access link on City website. ■ Connections made to Communications and Health and Human Services Departments and other offices to ensure that individuals are referred appropriately to Mass Access when looking for accessible housing opportunities. ■ Provide link and details to the City’s Housing Rehabilitation Program. ■ Provide link to Somerville Housing Authority, MBHP, SCC and other organizations who provide accessible housing or home modification loan programs. ■ Review quarterly to ensure information is relevant and up date. ○ Timeframe: Fall 2017 with ongoing review. ● Milestone: Provide a list of accessible units available through the City’s Inclusionary Housing Program on the City’s website.

	<ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Compile a list of accessible units, AMI limit the unit is set at, unit type, features and location. ■ Publish information on website. ■ Link to inclusionary housing listserv signup page and list of resources described above. ■ Review and update as available. ○ Timeframe: Publish by Spring 2018; ongoing bi-annual review.
Goal #3	Conduct research and analysis to better understand the housing needs of people with disabilities.
Contributing Factor(s) Addressed	Location of accessible housing in range of unit sizes
Discussion	The need for housing is much higher than the availability of units. The cost of housing in Somerville is oftentimes prohibitive for people with disabilities. There is also a lack of units with 2 or more bedrooms. Without affordable units, persons with disabilities may continue to have disproportionate housing needs.
Metrics, Milestones and Timeframe for Achievement	<ul style="list-style-type: none"> ● Milestone: Explore the possibility of conducting further analysis on the housing needs of people with disabilities. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Identify and consult with potentially interested parties and/or partners to create a prospective budget and timeline for potential research. ○ Timeframe: Winter 2018.
Goal #4	Improve accessibility of public spaces in Somerville by building on the improvements previously made to the East Broadway streetscape and continuing to invest in infrastructure improvements in the area.
Contributing Factor(s) Addressed	Inaccessible public infrastructure (sidewalks)
Discussion	Evidence indicates a lack of compliant Accessible Pedestrian Signals at 85% as of 2014, creating barriers to accessibility throughout the City. The City of Somerville Transition Plan seeks to address accessibility issues through a yearly assessment. The Director of Diversity, Equity, and Inclusion Services is taking the lead in tracking these areas.

Metrics, Milestones and Timeframe for Achievement	<ul style="list-style-type: none"> ● Milestone: Streetscape improvement including wider, ADA compliant sidewalks, sidewalk and crosswalk treatments, trees and grates and ornamental LED lighting. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Complete planned construction of accessible sidewalks and curb ramps at various locations Citywide, including major 2017-2018 street and sidewalk reconstruction projects like Lowell Street and Cedar Street. ○ Timeframe: The City’s 2017-2018 Annual Action Plan has a target date of 6/29/2018.
Goal #5	Provide increased information about reasonable accommodation requests to residents and staff.
Contributing Factor(s) Addressed	Standards for approving reasonable accommodation requests
Discussion	A community social worker shared her client’s experience on the WINS Survey in which the client was discouraged from applying for a reasonable accommodation as she was told that she “didn’t look disabled.” The social worker expressed the need for increased awareness/education of disabilities that are not immediately apparent and impedes the client’s ability to access suitable housing.
Metrics, Milestones and Timeframe for Achievement	<ul style="list-style-type: none"> ● Milestone: The Health and Human Services Department will explore providing training and increased awareness to City staff, housing advocates and residents when requesting reasonable accommodation or accommodating/ processing reasonable requests. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Explore training options for City and Housing Advocates. ■ Create training curriculum for new City staff and annual refreshers for existing staff. ■ Develop list of interested housing organizations to offer this training. ○ Timeframe: Spring 2018. ● Milestone: Make the Reasonable Accommodations Policies and Procedures easily accessible on the City’s website. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Publish information on who can request a reasonable accommodation and how to as it relates to City activities. ■ On web page include links to requesting reasonable accommodations with other organizations. ■ Review and update periodically. ○ Timeframe: Winter 2017-Spring 2018.
Goal #6	Increase housing opportunities for people with disabilities.

Contributing Factor(s) Addressed	Lack of affordable, integrated housing for individuals who need supportive services
Discussion	Nonprofit organizations that provide housing services for people with disabilities reported that they tend to face NIMBYism when looking for new properties to rent for group homes.
Metrics, Milestones and Timeframe for Achievement	<ul style="list-style-type: none"> ● Milestone: The City will continue to fund the work of local nonprofit agencies that provide affordable housing paired with supportive services to aid low-income, disabled and formerly homeless families and individuals living in Somerville. Such non-profit agencies include the Somerville Homeless Coalition and Wayside Youth & Family Support Network, pending available funding. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Continue to serve as Continuum of Care (CoC) Lead and continue to submit the annual Collaborative application for HUD CoC funding. ○ Timeframe: Program funding is annual through an RFP process based on past program performance.

Fair Housing Enforcement, Outreach Capacity, and Resources

Contributing Factor	Priority	Justification
Lack of education of fair housing laws and tenant/landlord rights	1	This is an area that the City of Somerville and community partners can influence.
Lack of resources for fair housing agencies and organizations	1.5	This is an area that the City of Somerville and community partners can influence- however there are some restrictions as to the power of that influence.
Lack of local fair housing outreach and enforcement	1.5	This is an area that the City of Somerville and community partners can influence- however there are some restrictions as to the power of that influence.

Goal #1	Increase outreach to tenants, landlords, and residents in general, on fair housing issues through targeted campaigns.
Contributing Factor(s) Addressed	Lack of education of fair housing laws and tenant/landlord rights

<p>Discussion</p>	<p>Sixty six percent (66%) of respondents from the Community Survey did not know how to report a fair housing problem, despite having general awareness of fair housing organizations who work on fair housing issues in Somerville. Residents and community organizations note that materials are not always translated into multiple languages and are not accessible for those who do not speak English.</p>
<p>Metrics, Milestones and Timeframe for Achievement</p>	<ul style="list-style-type: none"> ● Milestones: Expand training opportunities to other local organizations on fair housing issues in addition to continuing training efforts at Somerville Community Corporation’s First-Time Homebuyers Seminar. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Initial fair housing training provided by the Fair Housing Commission at First Time Homebuyer Basics Seminar hosted by Naveo Credit Union. ○ Timeframe: To be established in Fall 2017/Winter 2018. ● Milestone: Develop resources both electronic and print in a variety of languages to improve access to information and resources on fair housing. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Revision of the 7th edition “The Tenant’s Helper: A Handbook for Renters” by the Fair Housing Commission. ■ Create fact sheets and have them translated into Spanish, Haitian Creole, and Portuguese and posted on the City’s website and social media and posted throughout the City. ■ Work with SomerViva to create videos with pertinent information described in the Tenant Helper in other languages. ■ Review, update and distribute annually. ○ Timeframe: Develop revised handbook by April 2018, translated fact sheets by July 2018, have electronic versions available on the City’s website and paper copies at the public libraries, Municipal buildings, delivered to public schools and community housing organizations by July 2018. ● Milestone: Develop an updated list of fair housing resources for residents to be available on the City’s website and as a paper document. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Published list of fair housing links/resources on the City’s Fair Housing Commission webpage and paper copies available in City Hall. ○ Timeframe: April 2018. ● Milestone: Somerville Fair Housing Commission and Housing Division staff will host a Fair and Affordable Housing Workshop/Fair to inform residents of their rights and connect them to resources. <ul style="list-style-type: none"> ○ Metrics:

	<ul style="list-style-type: none"> ■ Investigate other city and community organization fairs/ workshops and their approaches to disseminating information. ■ Develop a list of City Departments, Commissions, community and regional organizations willing to work together to organize and or attend fair. ■ Create marketing campaign involving community including; faith based, affordable housing organizations, LEP, immigrant communities, schools, organizations working with the elderly and disabled. ■ Host fair semi-annually to ensure residents are continuously connected to the most up to date information and resources they need. <ul style="list-style-type: none"> ○ Timeframe: Research and bring parties together through 2018, host first fair not later than Spring 2019.
Goal #2	Research potential funding options for the Fair Housing Commission’s programs and activities.
Contributing Factor(s) Addressed	Lack of resources for fair housing agencies and organizations Lack of local fair housing outreach and enforcement
Discussion	The Fair Housing Commission is unpaid and therefore restricted in the amount of capacity it can bring as an entity. A strengthened staff liaison position is needed in order to provide necessary support to the FHC and help to distribute information to the public. Furthermore, the Massachusetts Commission Against Discrimination (MCAD) is facing a backlog of cases and thus utilizing the Fair Housing Commission to explore fair housing issues in Somerville is ineffective. Somerville does not currently have a private organization working on fair housing issues within its boundaries; the City will explore other funding that is available, and will work with the FHC in order to pursue funding options.
Metrics, Milestones and Timeframe for Achievement	<ul style="list-style-type: none"> ● Milestone: Initiate the revised Program Specialist position to the Fair Housing Commission <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Fill current vacancy to provide Program Specialist as staff to the Fair Housing Commission as liaison to the City’s communications department to request print materials of “The Tenant’s Helper: A Handbook for Renters” guide. ■ Staff person to update the City’s Fair Housing Commission webpage with a list of fair housing links/resources and any other fair housing materials to be distributed via print and/or the City’s website. ■ Staff person to research potential funding mechanisms for the Fair Housing Commission. ○ Timeframe: Fall 2017-Winter 2018.

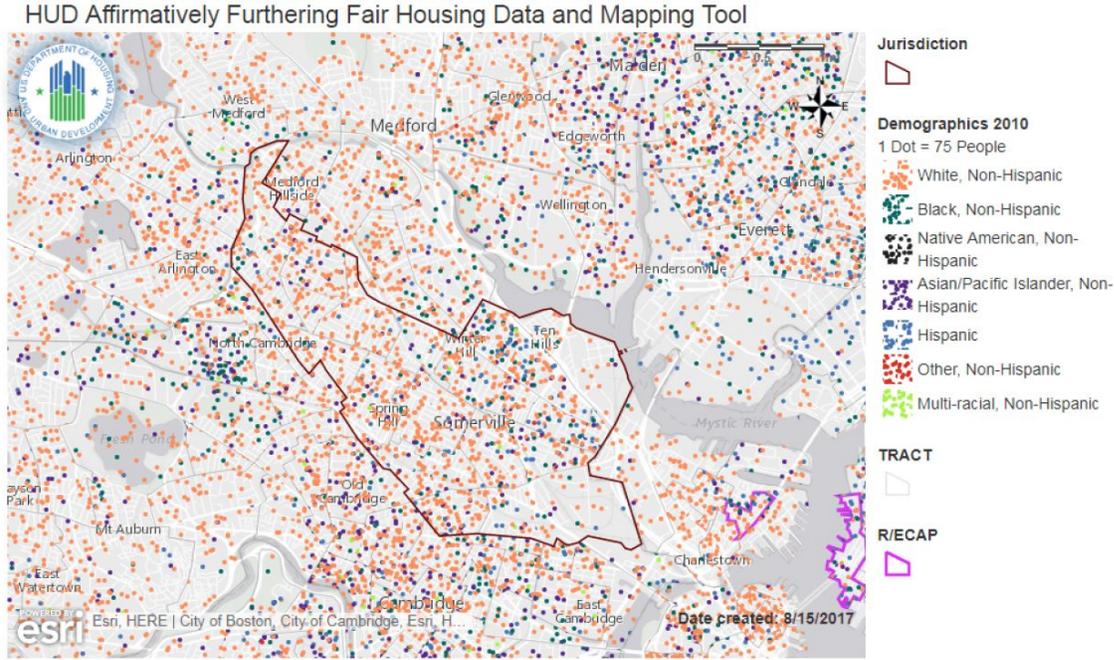
	<ul style="list-style-type: none"> ● Milestone: Become a Fair Housing Assistance Program in order to obtain funding for Somerville’s FHC, allowing them to more effectively advocate and inform protected classes of their rights. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Work with FHC to obtain necessary initial certification from HUD. ■ Once certification is complete, continue to work with FHC to submit full application for FHAP funding. ○ Timeframe: Submit necessary documents to HUD for certification by Winter 2017 in order to obtain interim FHAP status. After three years in interim status, the City will then be eligible to apply for full FHAP status and unlock additional funding.
Goal #3	Explore other ways to structure the Fair Housing Commission so that it is consistently and adequately staffed to meet the needs of local residents.
Contributing Factor(s) Addressed	Lack of local fair housing outreach and enforcement Lack of resources for fair housing agencies and organizations
Discussion	Conversations with the Fair Housing Commission suggest that the ordinances highly specific requirements for seats on the Commission have made it difficult to fill vacancies. Due to the capacity constraints of the FHC, fair housing issues are usually referred to a single agency for the jurisdiction and greater Boston area making it difficult to address fair housing issues directly and mediate each situation.
Metrics, Milestones and Timeframe for Achievement	<ul style="list-style-type: none"> ● Milestone: Fill existing vacancy for Program Specialist as staff to the Fair Housing Commission with someone who has an understanding and experience in fair housing issues and advocacy. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Review of Program Specialist and staff to the Fair Housing Commission job description to match needs of Housing Division and Fair Housing Commission and hire staff person accordingly. ○ Timeframe: Fall 2017. ● Milestone: Explore feasibility of changing the Fair Housing Commission’s ordinance related to specific requirements (as mentioned in Sec. 7-46.-Fair housing commission.) that have left the Commission facing somewhat extended vacancies. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ FHC and Housing Division will explore feasibility. ■ If there’s a possibility, revise fair housing ordinance specific requirements (as mentioned in Sec. 7-46.-Fair housing commission). ■ Understand feasibility of amendment of the fair housing ordinance by the

	<p>Board of Aldermen.</p> <ul style="list-style-type: none"> ○ Timeframe: Determine feasibility by Spring 2018.
Goal #4	Explore regional collaboration with the Metropolitan Boston Housing Partnership Fair Housing Project, the Suffolk University Law Housing Discrimination Testing Project, Cambridge Somerville Legal Services and the Greater Boston Fair Housing Center for assistance with advocacy, outreach, and training.
Contributing Factor(s) Addressed	<p>Lack of local fair housing outreach and enforcement</p> <p>Lack of resources for fair housing agencies and organizations</p>
Discussion	Each of the organizations listed above have websites that provide valuable fair housing information that could benefit the people of Somerville who are experiencing fair housing issues. This information should be made easily accessible to those who need it on the City website.
Metrics, Milestones and Timeframe for Achievement	<ul style="list-style-type: none"> ● Milestone: The City of Somerville website to be updated with links to the MBHP Fair Housing Project, the Suffolk University Law Housing Discrimination Testing Project, Cambridge Somerville Legal Services (CASLS) and the Greater Boston Fair Housing Center. <ul style="list-style-type: none"> ○ Metrics: <ul style="list-style-type: none"> ■ Links added to website with descriptions. ■ Regularly check page to ensure links and information are relevant and up to date. ■ Build and maintain a working relationship with organizations listed above. ■ Cross promote events related to fair housing. ■ Work with community and regional organizations to make sure they have the most up to date FHC and Housing Division information. ○ Timeframe: Winter 2018 and ongoing communication and webpage maintenance.

VII. Appendices

APPENDIX A-HUD-Provided Maps

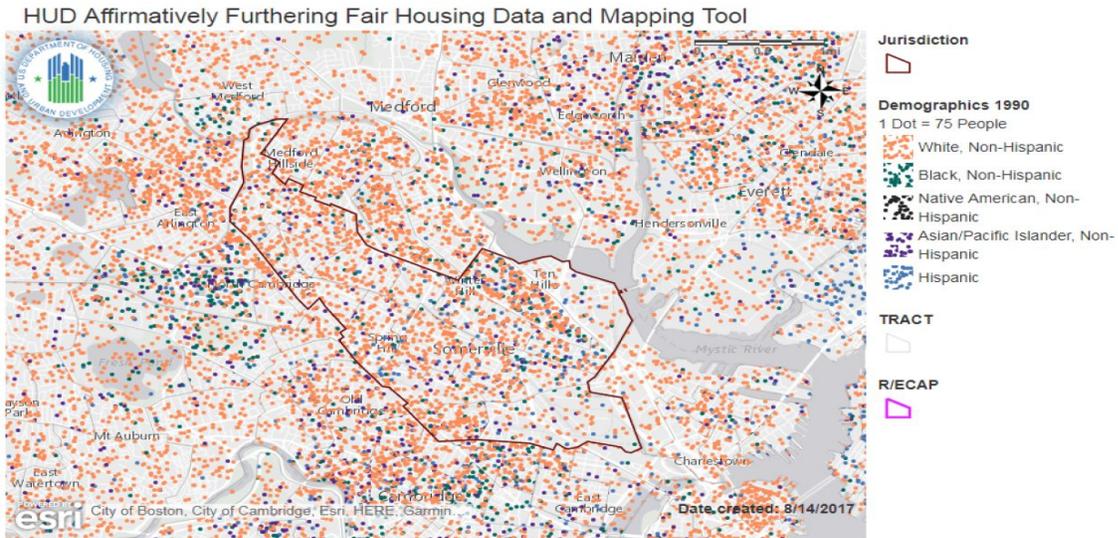
Map 1 Race/Ethnicity – Current (2010) race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs



Name: Map 1 - Race/Ethnicity
Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs
Jurisdiction: Somerville (CDBG, HOME, ESG)
Region: Boston-Cambridge-Newton, MA-NH

Map 2 Race/Ethnicity Trends – Past (1990, 2000 and 2010) race/ethnicity dot density maps for Jurisdiction and Region with R/ECAPs

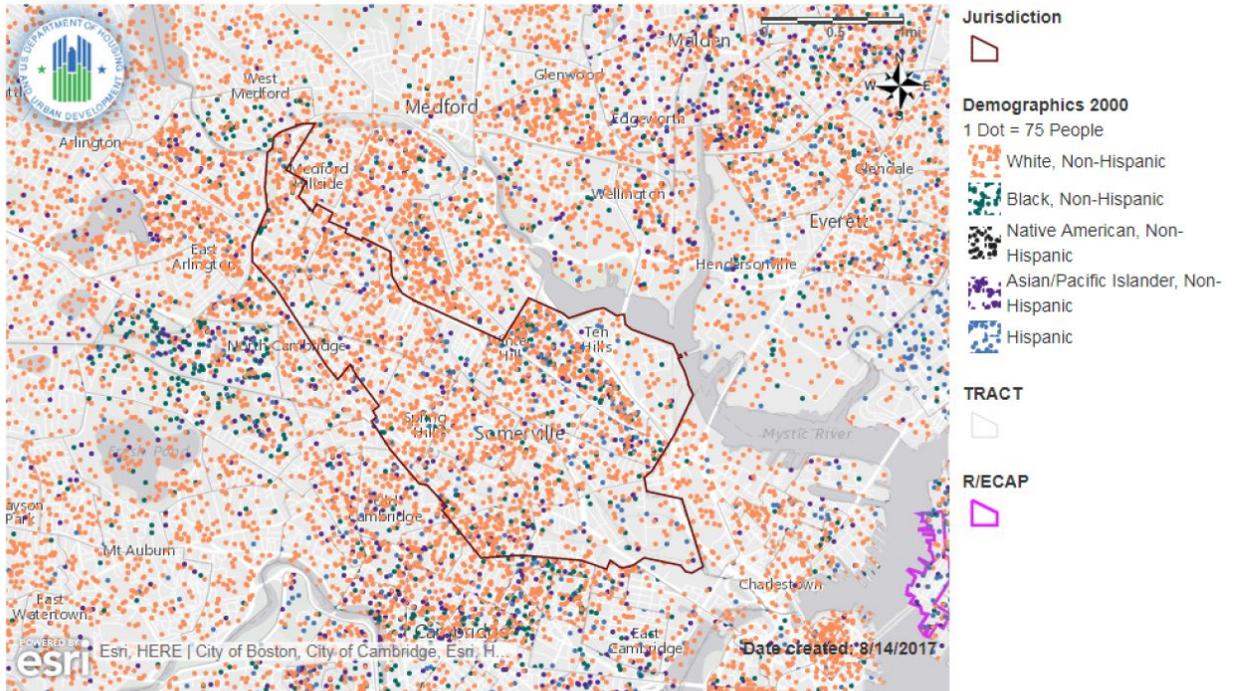
Map 2-A: 1990



Name: Map 2 - Race/Ethnicity Trends
Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs
Jurisdiction: Somerville (CDBG, HOME, ESG)
Region: Boston-Cambridge-Newton, MA-NH

Map 2-B: 2000

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Name: Map 2 - Race/Ethnicity Trends

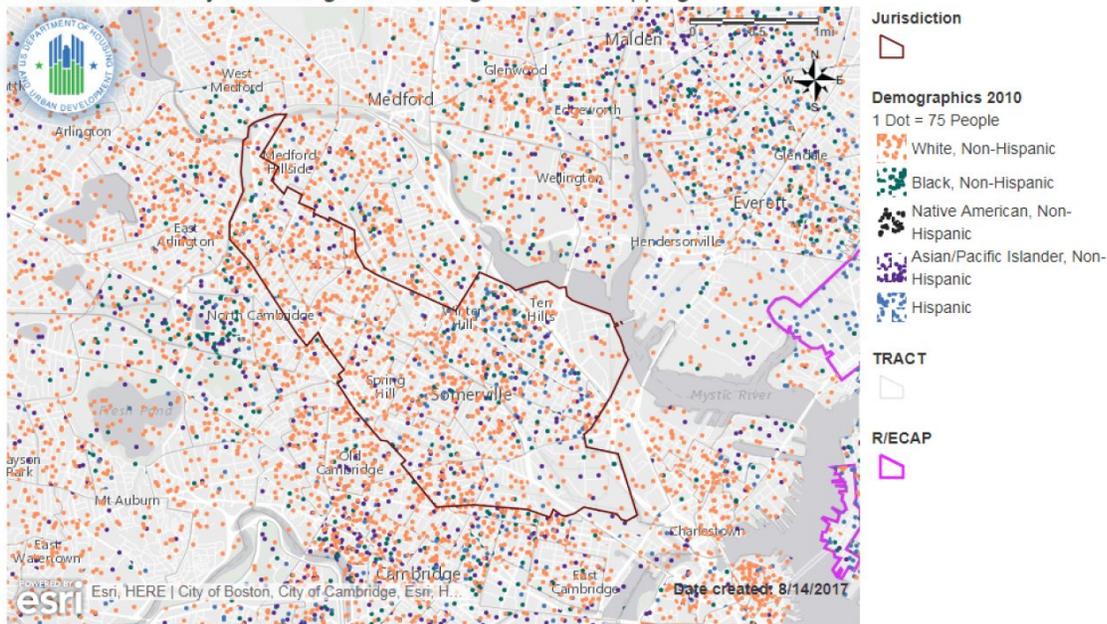
Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Somerville (CDBG, HOME, ESG)

Region: Boston-Cambridge-Newton, MA-NH

Map 2-C: 2010

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 2 - Race/Ethnicity Trends

Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

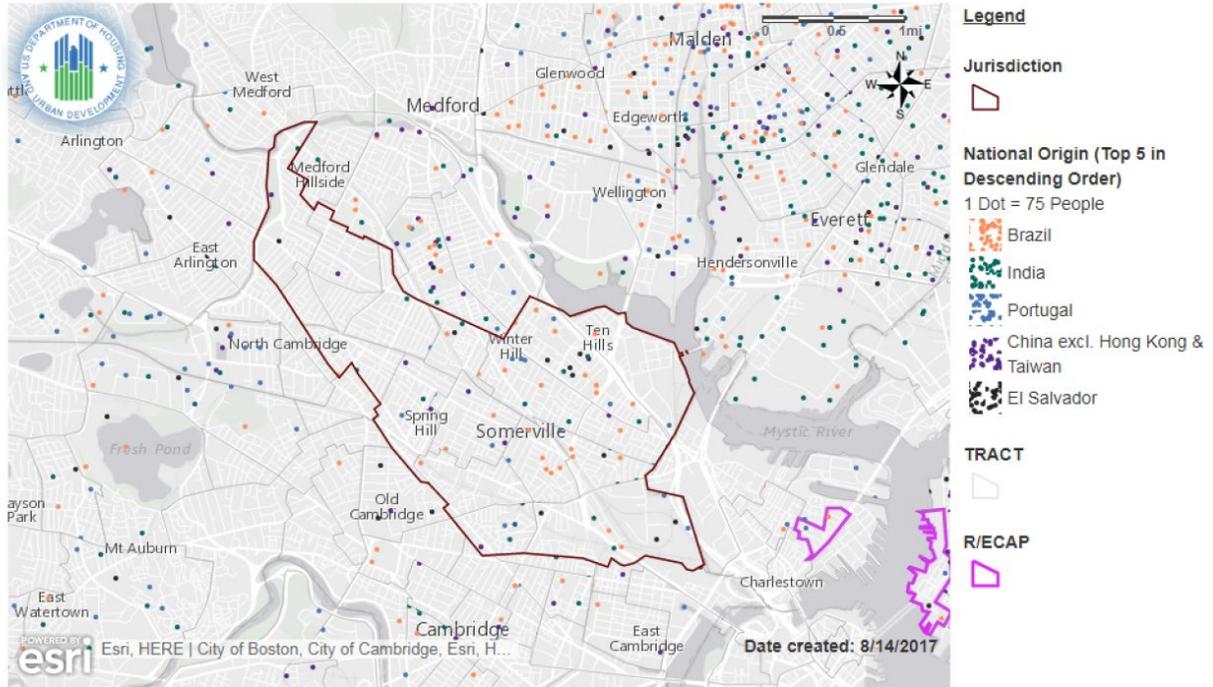
Jurisdiction: Somerville (CDBG, HOME, ESG)

Region: Boston-Cambridge-Newton, MA-NH

Map 3 National Origin – Current (2010) 5 most populous national origin groups dot density map for

Jurisdiction and Region with R/ECAPs

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Name: Map 3 - National Origin

Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs

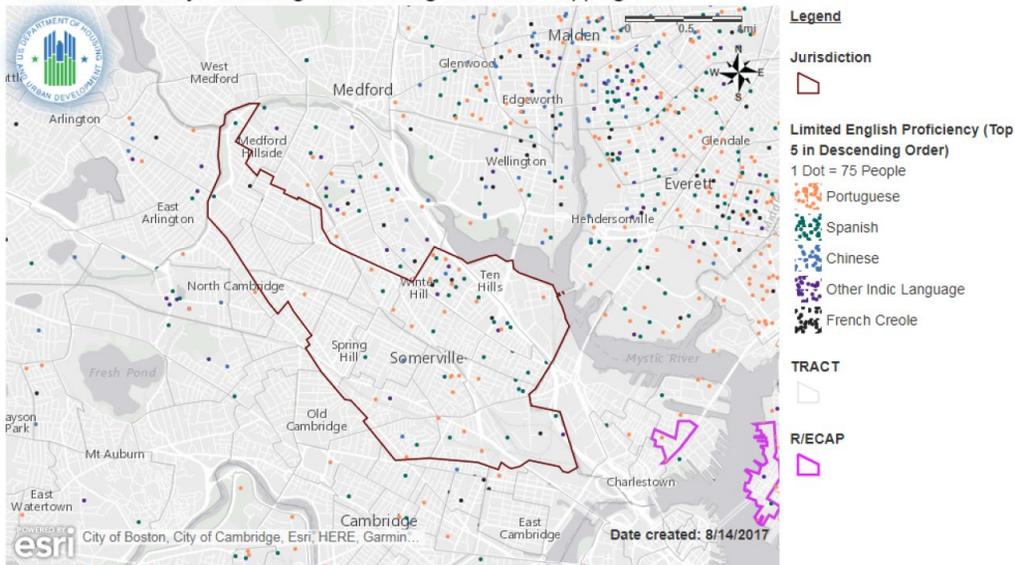
Jurisdiction: Somerville (CDBG, HOME, ESG)

Region: Boston-Cambridge-Newton, MA-NH

Map 4 LEP – Current (2010) LEP persons by 5 most populous languages dot density map for

Jurisdiction and Region with R/ECAPs

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Name: Map 4 - LEP

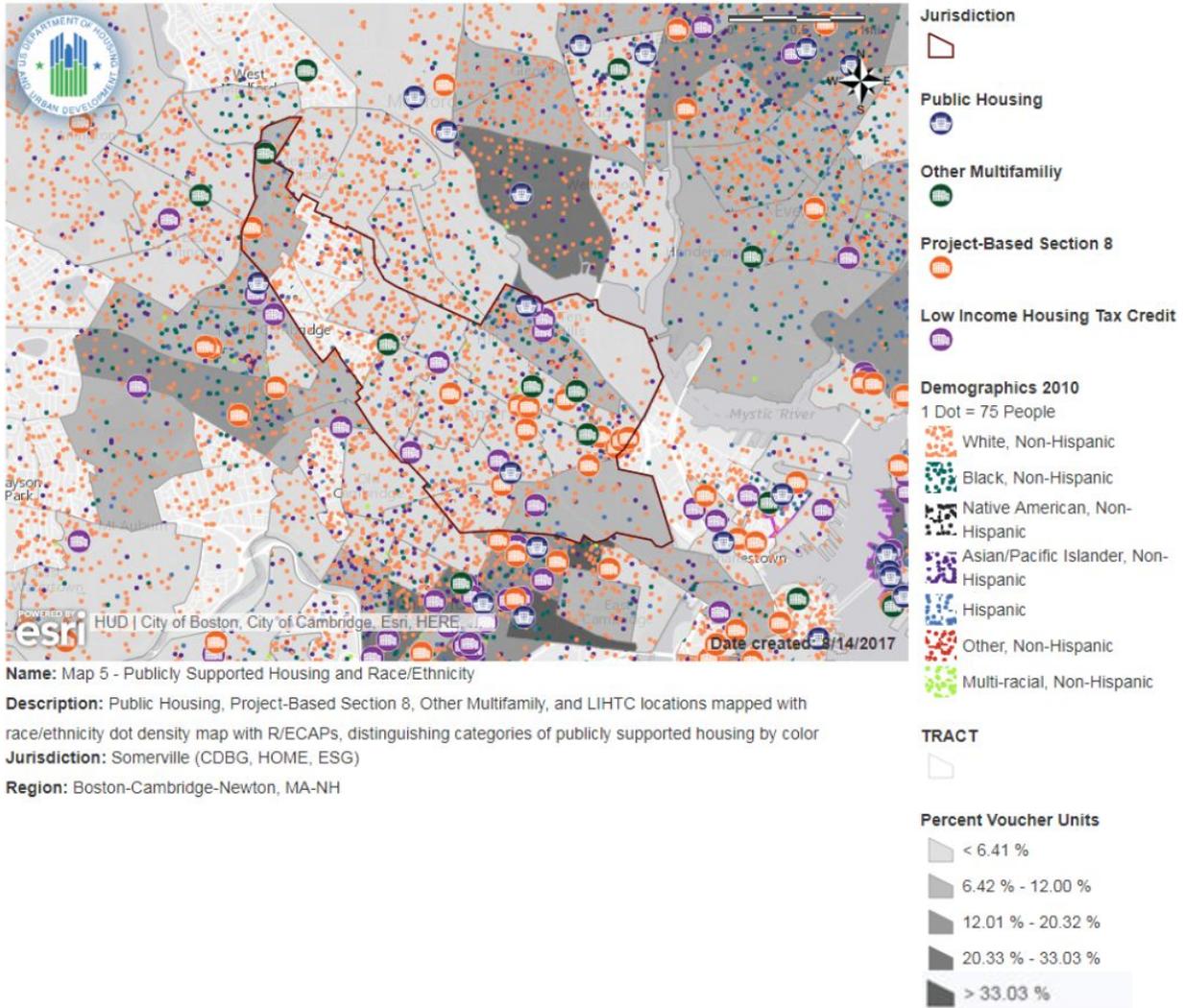
Description: LEP persons (5 most commonly used languages) for Jurisdiction and Region with R/ECAPs

Jurisdiction: Somerville (CDBG, HOME, ESG)

Region: Boston-Cambridge-Newton, MA-NH

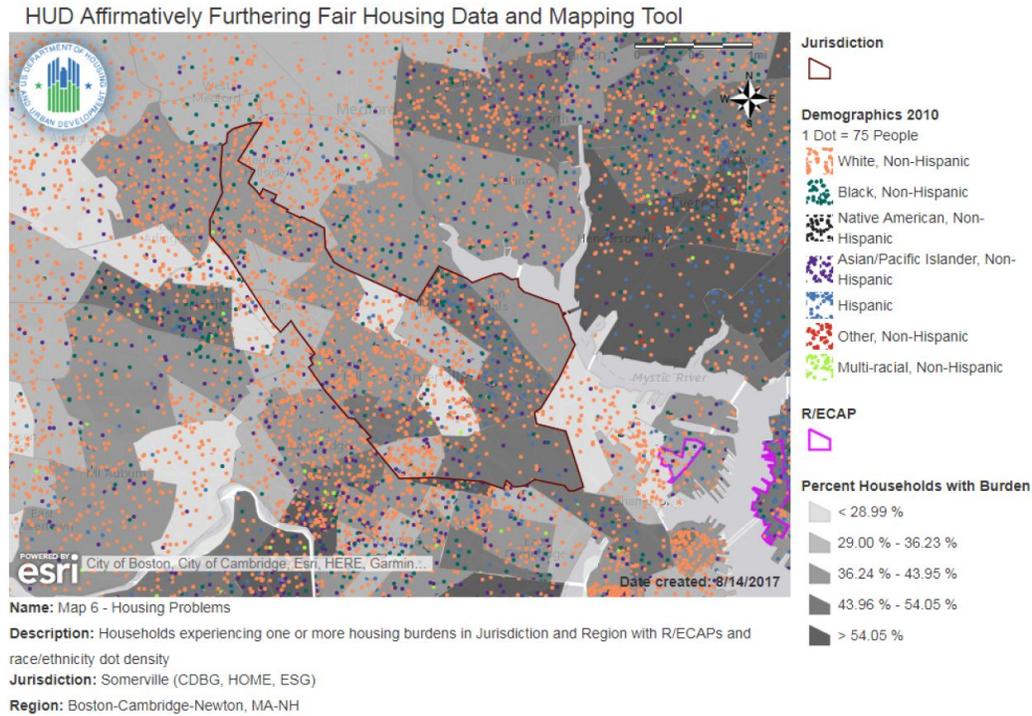
Map 5 Publicly Supported Housing and Race/Ethnicity – Housing Choice Voucher thematic map overlaid with Public Housing, Project-Based Section 8, Other Multifamily, and LIHTC locations with race/ethnicity dot density and R/ECAPs, distinguishing categories of publicly supported housing by color, for the Jurisdiction and Region

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

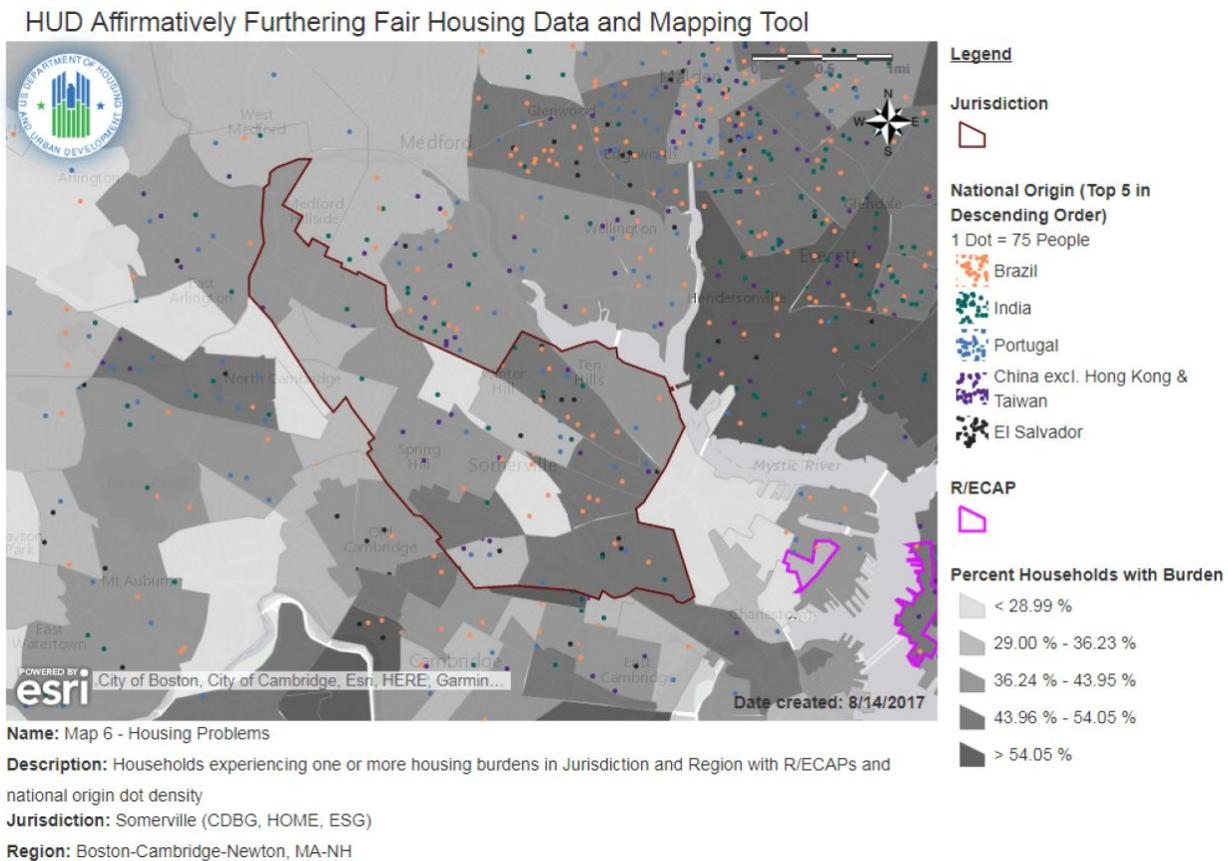


Map 6 Housing Burdens – Households experiencing one or more housing burdens in Jurisdiction and Region with race/ethnicity and national origin dot density maps and R/ECAPs

Map 6-A: Race/Ethnicity

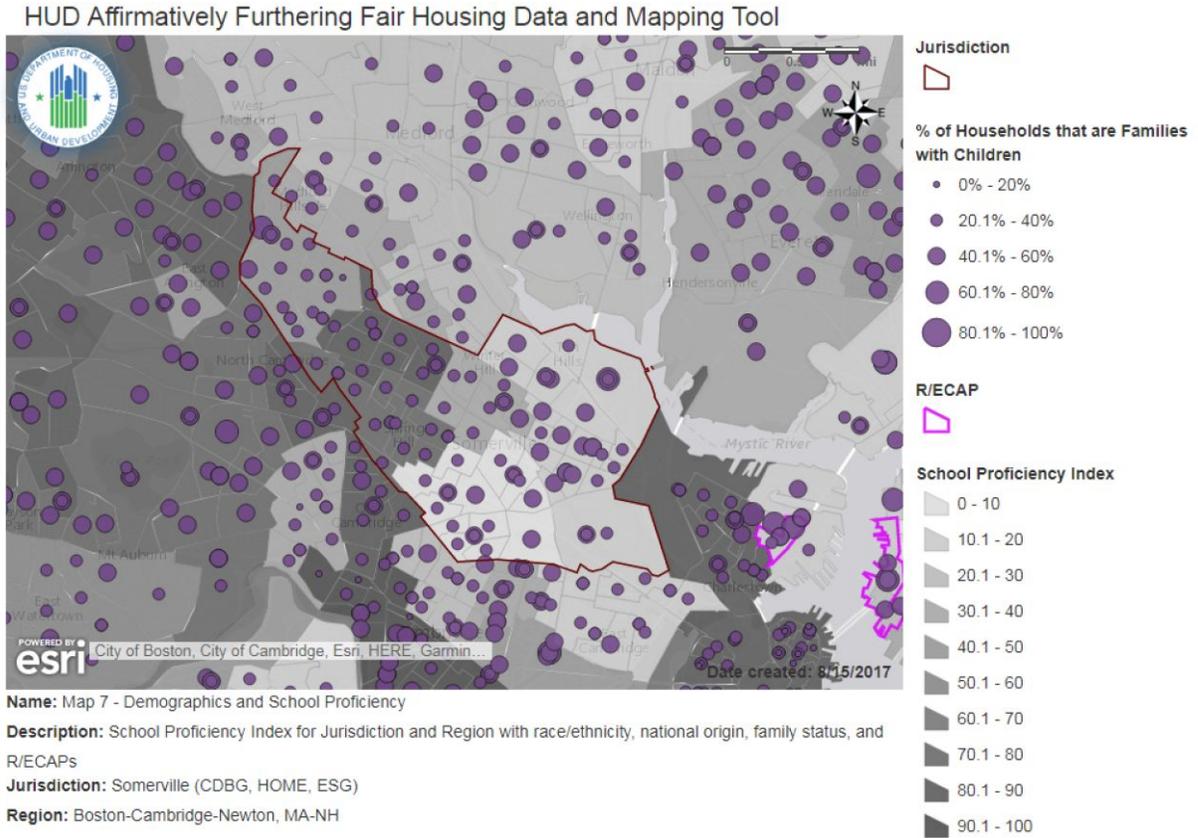


Map 6-B: National Origin

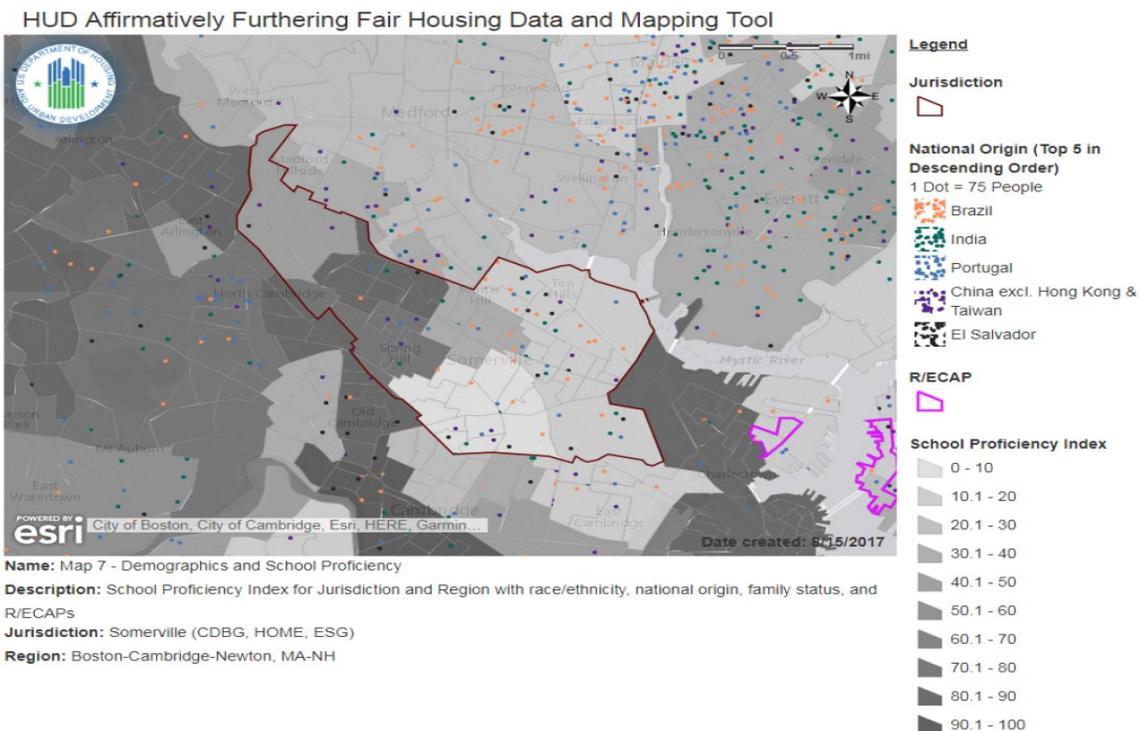


Map 7 Demographics and School Proficiency – School proficiency thematic map for Jurisdiction and Region with race/ethnicity, national origin, and familial status maps and R/ECAPs

Map 7-A: Familial Status

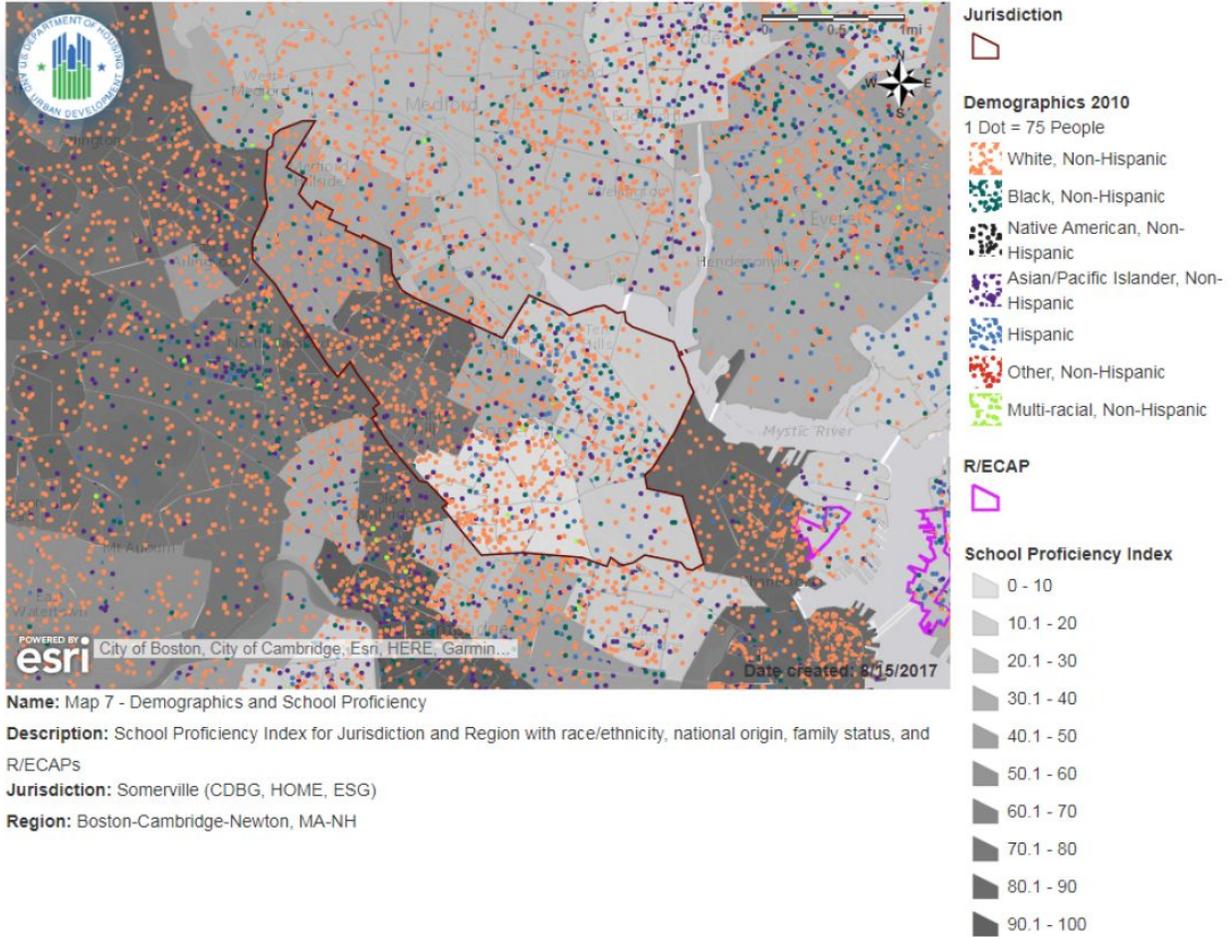


Map 7-B: National Origin



Map 7-C: Race/Ethnicity

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Map 8 Demographics and Job Proximity – Job proximity thematic map for Jurisdiction and Region with race/ethnicity, national origin, and familial status maps and R/ECAPs

Map 8-A: Familial Status



Map 8-B: National Origin

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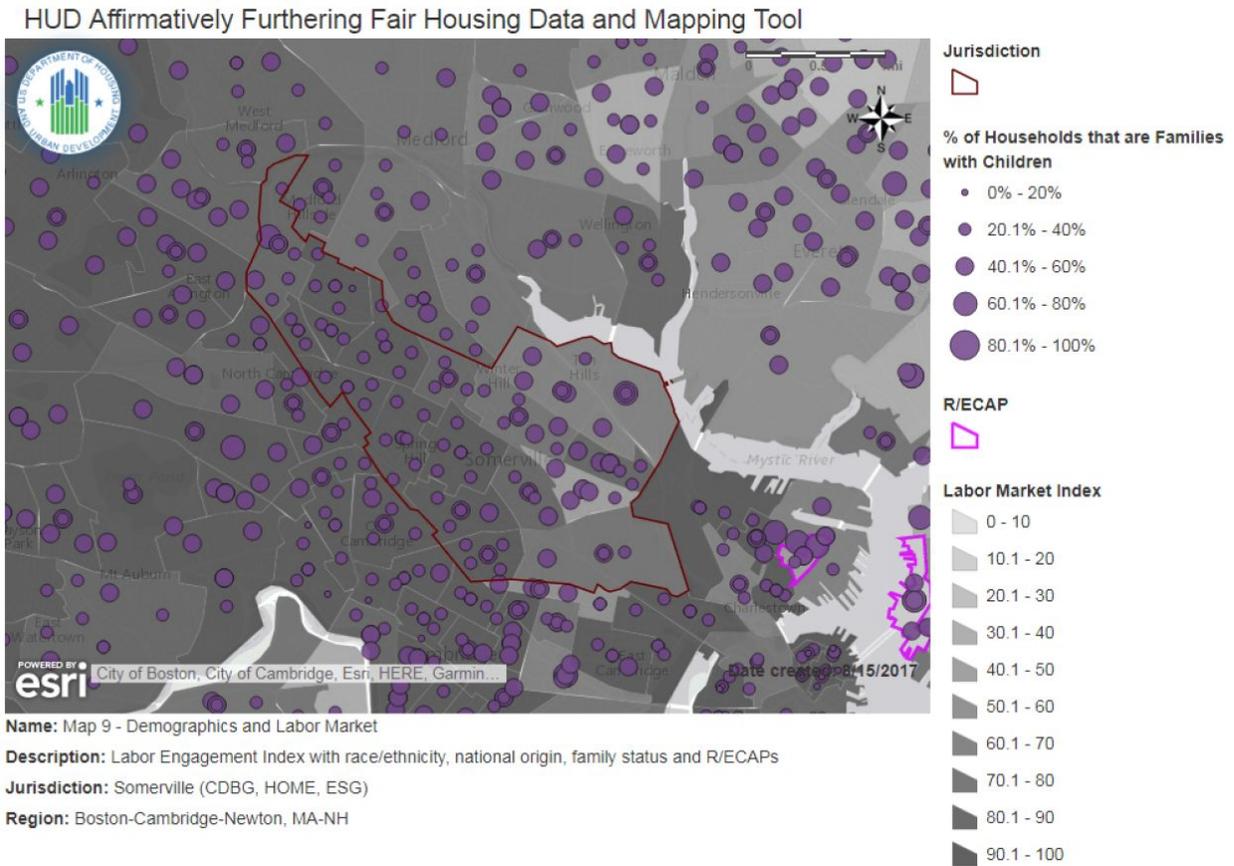
Map 8-C: Race/Ethnicity

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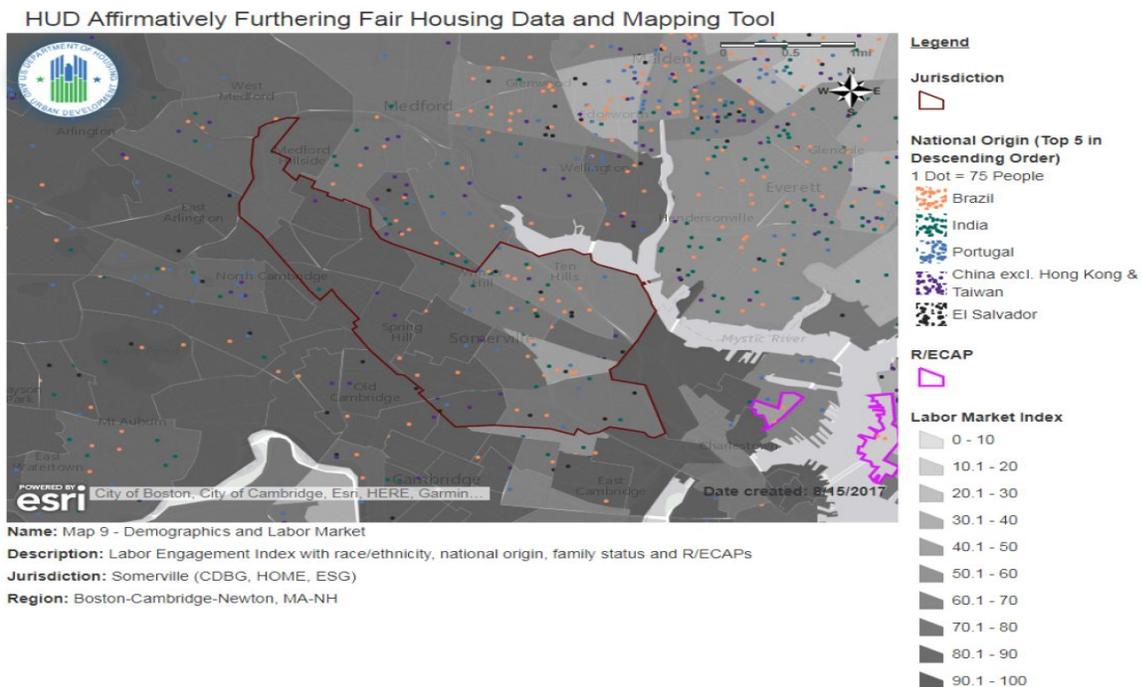


Map 9 Demographics and Labor Market – Labor engagement thematic map for Jurisdiction and Region with race/ethnicity, national origin, and familial status maps and R/ECAPs

Map 9-A: Familial Status



Map 9-B: National Origin



Map 9-C: Race/Ethnicity

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Map 10 Demographics and Transit Trips – Transit proximity thematic map for Jurisdiction and Region with race/ethnicity, national origin, and familial status maps and R/ECAPs

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

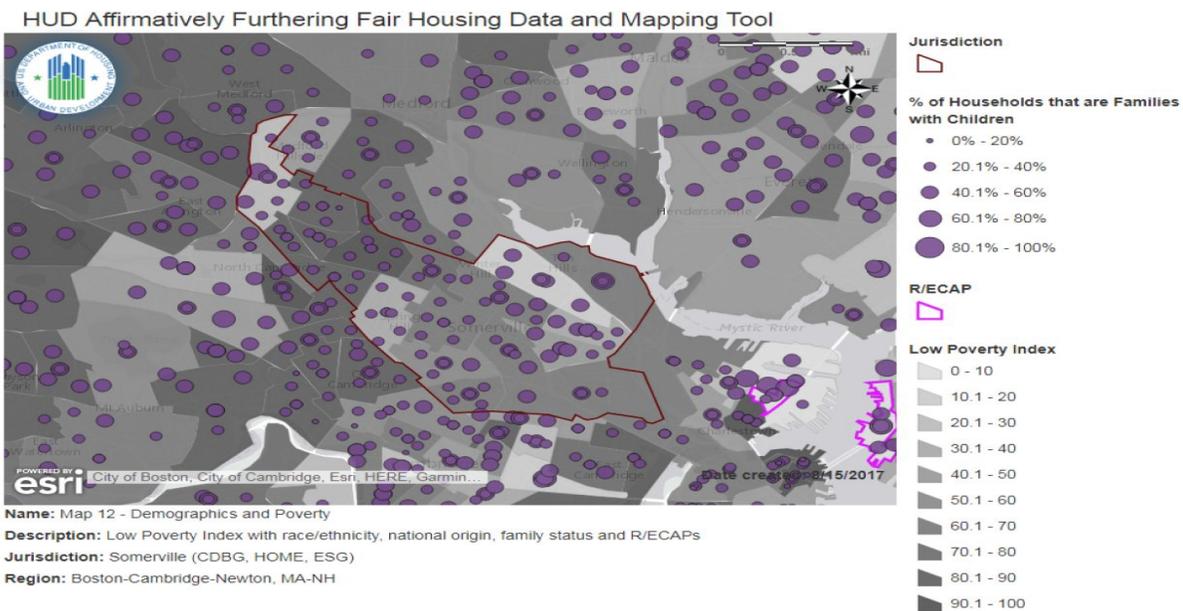


Map 11 Demographics and Low Transportation Costs – Low transportation cost thematic map for Jurisdiction and Region with race/ethnicity, national origin, and familial status maps and R/ECAPs
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



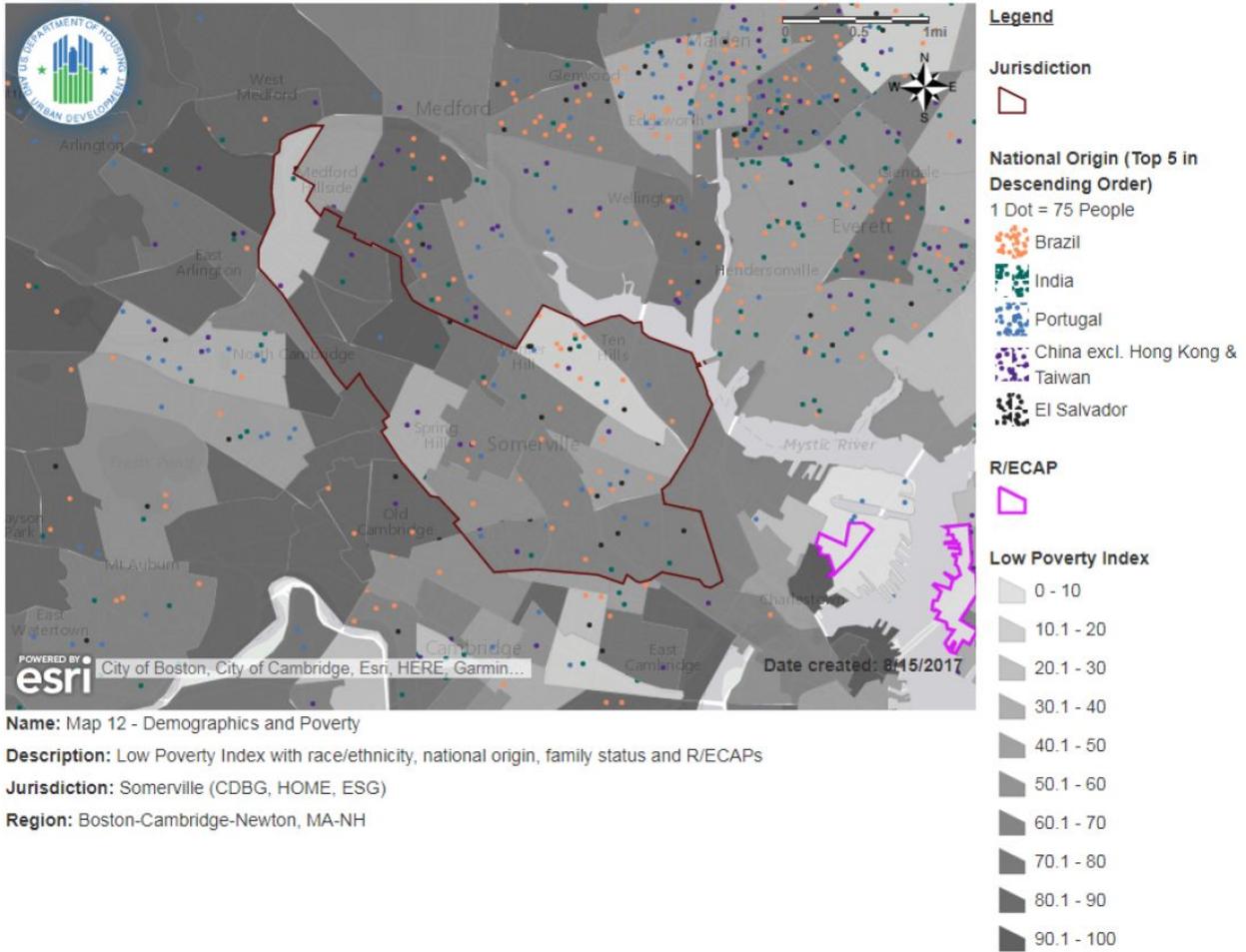
Map 12 Demographics and Poverty – Low poverty thematic map for Jurisdiction and Region with race/ethnicity, national origin, and familial status maps and R/ECAPs

Map 12-A: Familial Status



Map 12-B: National Origin

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



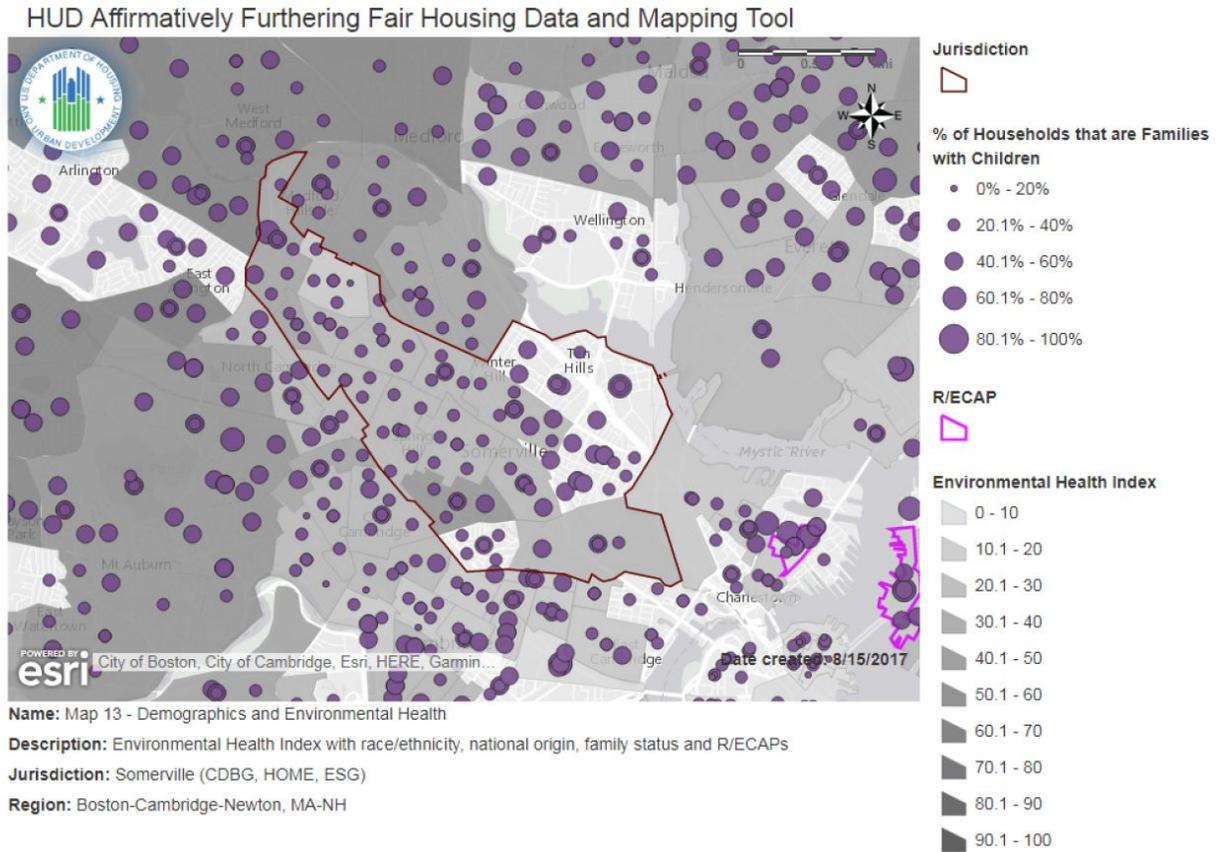
Map 12-C: Race/Ethnicity

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

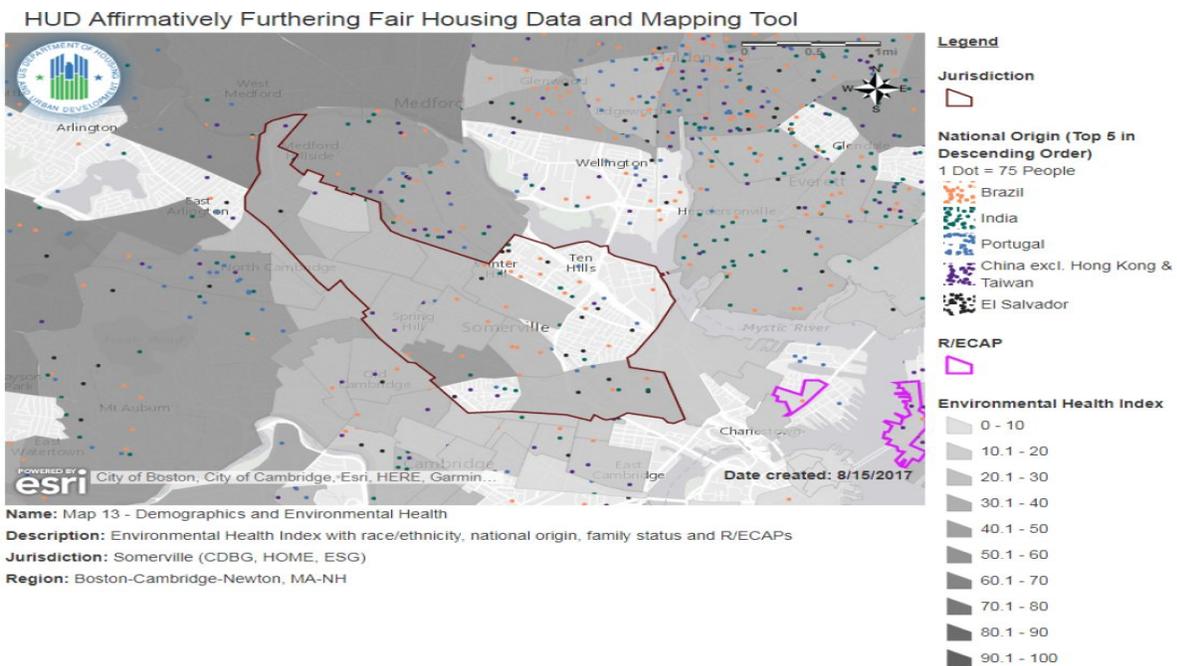


Map 13 Demographics and Environmental Health – Environmental health thematic map for Jurisdiction and Region with race/ethnicity, national origin, and familial status maps with R/ECAPs

Map 13-A: Familial Status

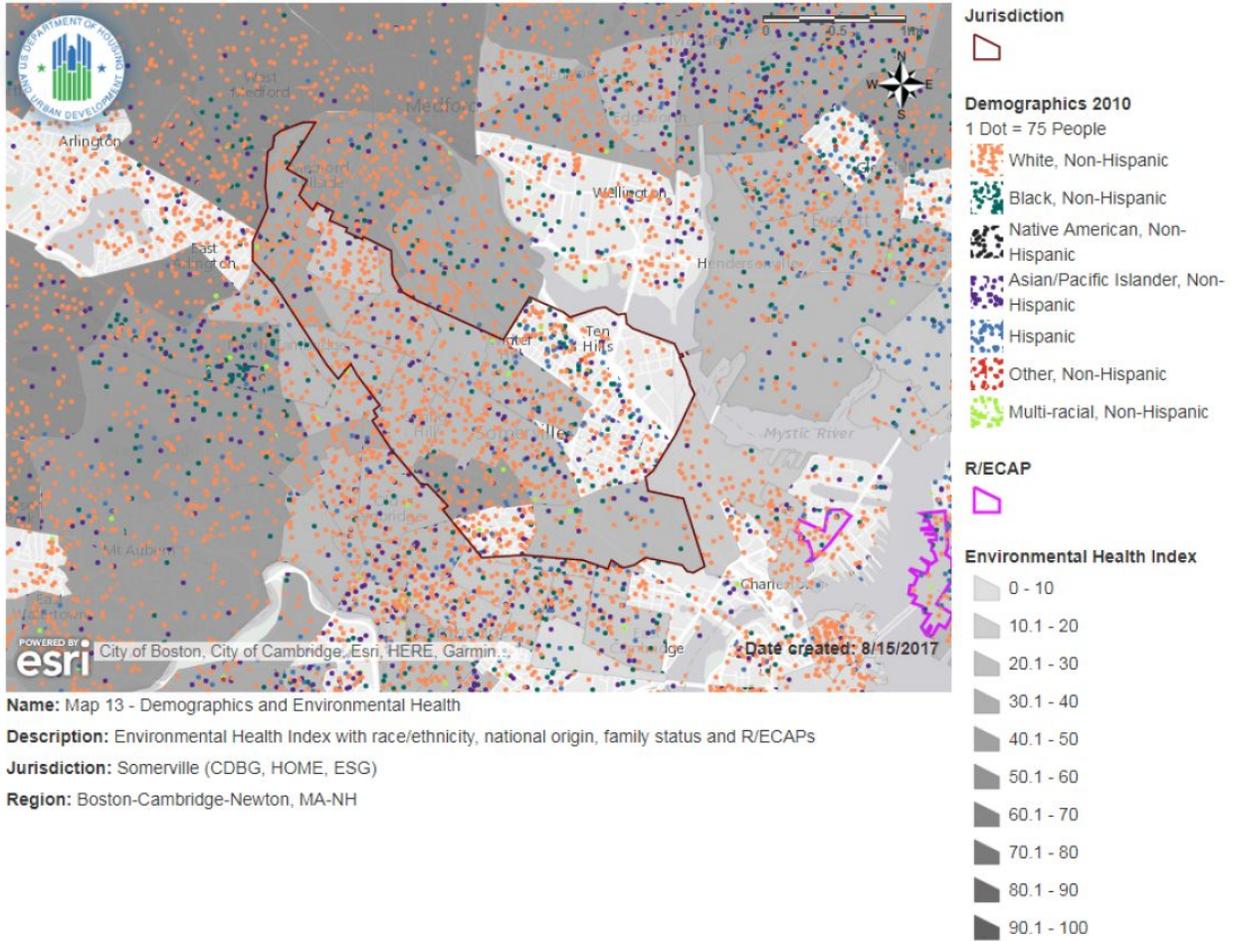


Map 13-B: National Origin



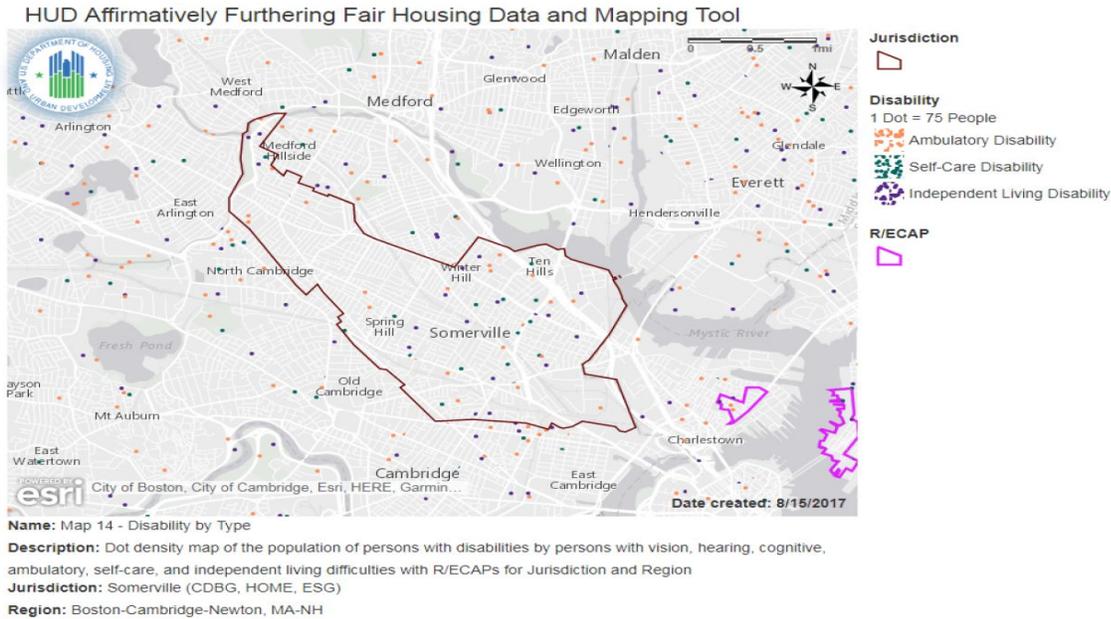
Map 13-C: Race/Ethnicity

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

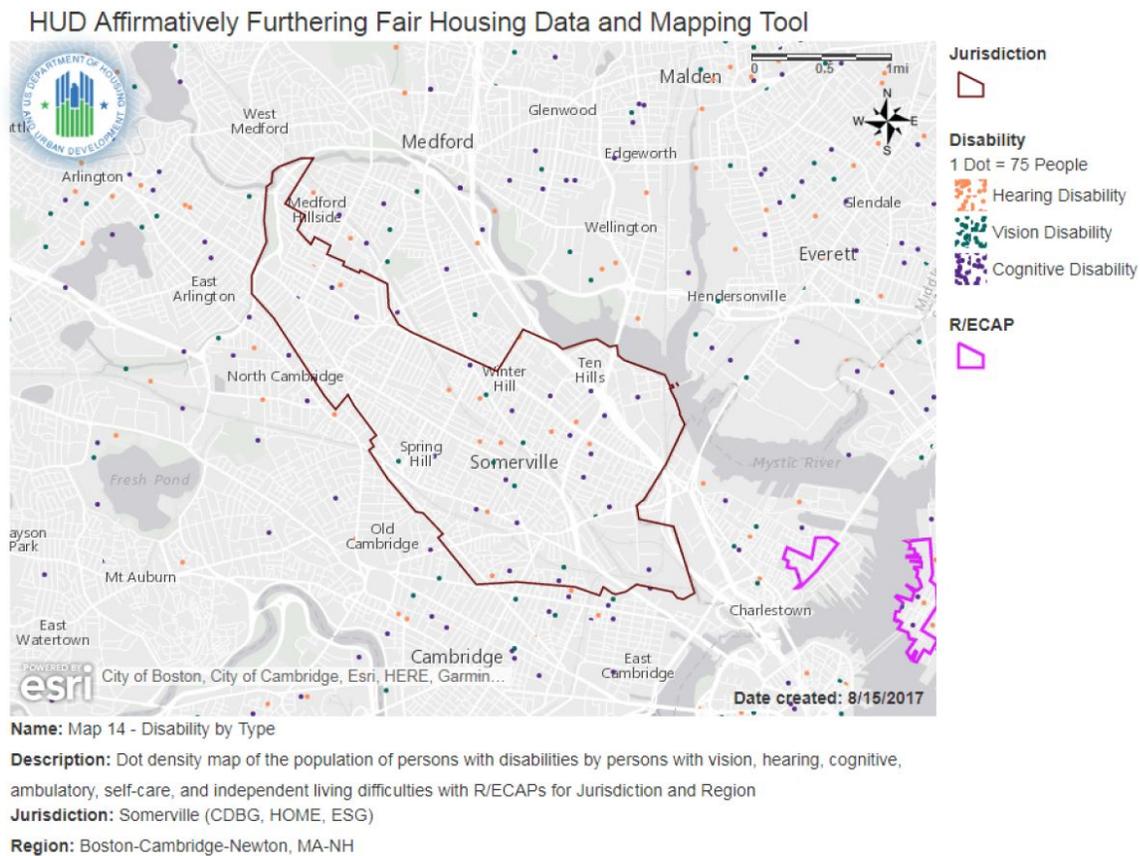


Map 14 Disability by Type – Population of persons with disabilities dot density map by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

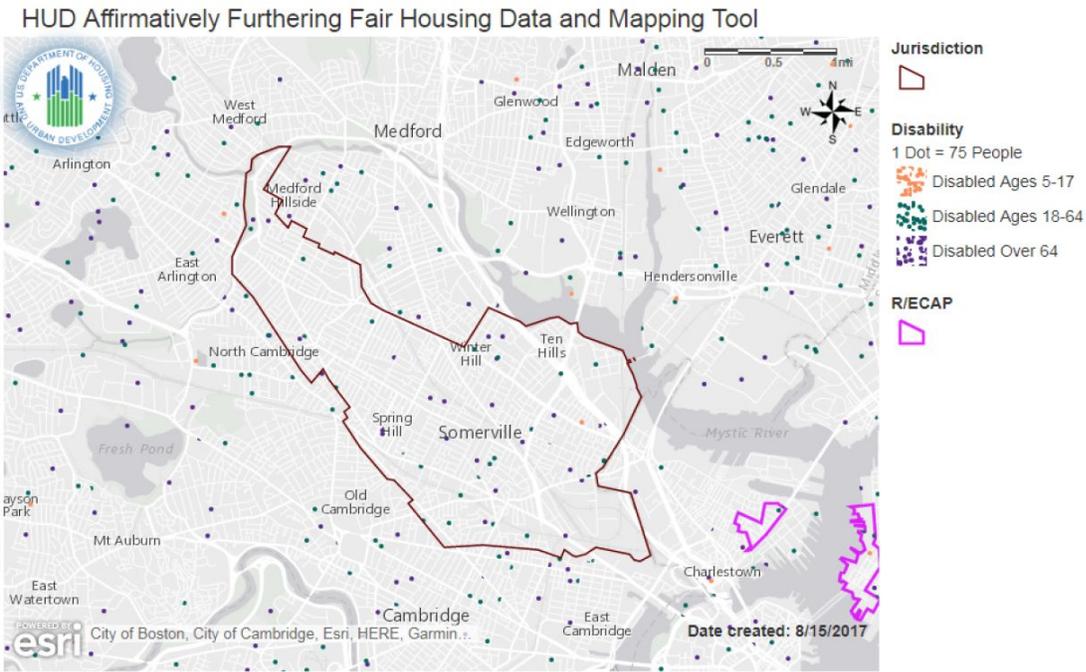
Map 14-A: Ambulatory, Self-care & Independent Living Disability



Map 14-B: Vision, Hearing & Cognitive Disability

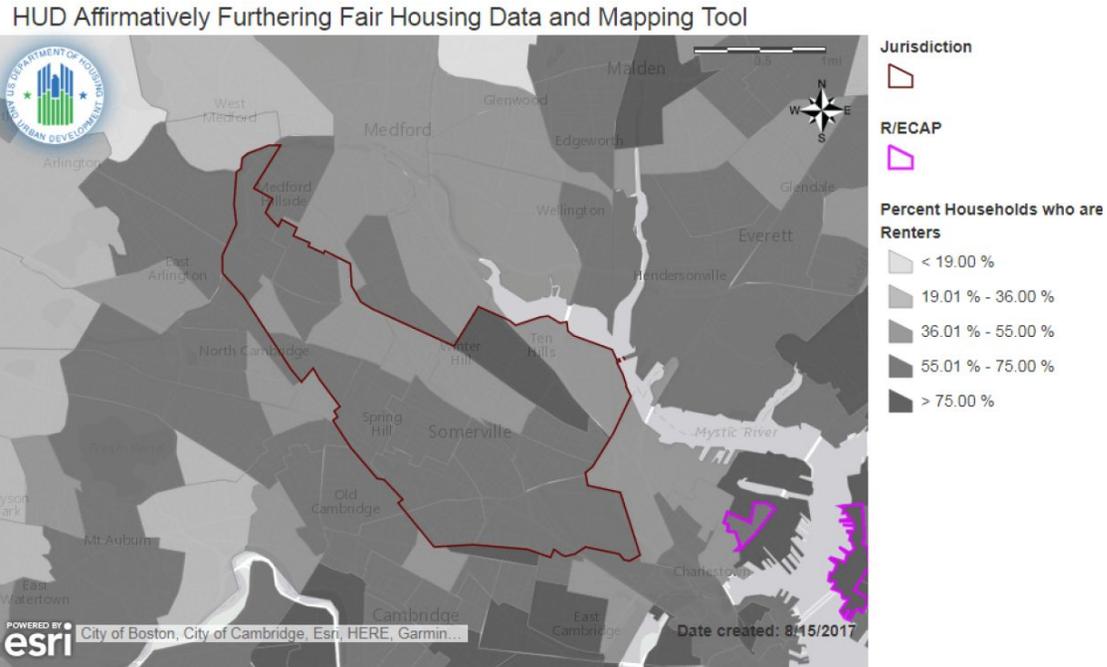


Map 15 Disability by Age Group – All persons with disabilities by age range (5-17; 18-64; and 65+) dot density map with R/ECAPs for Jurisdiction and Region



Name: Map 15 - Disability by Age Group
Description: All persons with disabilities by age range (5-17)(18-64)(65+) with R/ECAPs
Jurisdiction: Somerville (CDBG, HOME, ESG)
Region: Boston-Cambridge-Newton, MA-NH

Map 16 – Housing Tenure – Thematic map of percent of units occupied by homeowners and thematic map of percent of units occupied by renters and R/ECAPs



Name: Map 16 - Housing Tenure
Description: Housing Tenure by Renters with R/ECAPs
Jurisdiction: Somerville (CDBG, HOME, ESG)
Region: Boston-Cambridge-Newton, MA-NH

APPENDIX B – HUD-Provided Tables

Table 1 Demographics – Demographic data for Jurisdiction and Region (including total population, the number and percentage of persons by race/ethnicity, national origin (10 most populous), LEP (10 most populous), disability (by disability type), sex, age range (under 18, 18-64, 65+), and households with children)

	[Somerville, MA CDBG, HOME, ESG] Jurisdiction		[Boston-Cambridge-Newton, MA-NH] Region			
Race/Ethnicity	#	%	#	%		
White, Non-Hispanic	52,359	69.12%	3,408,584	74.87%		
Black, Non-Hispanic	4,869	6.43%	301,533	6.62%		
Hispanic	8,017	10.58%	410,516	9.02%		
Asian or Pacific Islander, Non-Hispanic	6,594	8.70%	293,833	6.45%		
Native American, Non-Hispanic	90	0.12%	6,347	0.14%		
Two or More Races, Non-Hispanic	2,136	2.82%	84,628	1.86%		
Other, Non-Hispanic	1,689	2.23%	46,960	1.03%		
National Origin						
#1 country of origin	Brazil	2,945	4.04%	Dominican Republic	62,800	1.44%
#2 country of origin	India	1,560	2.14%	China excl. Hong Kong & Taiwan	61,975	1.43%
#3 country of origin	Portugal	1,547	2.12%	Brazil	49,283	1.13%
#4 country of origin	China excl. Hong Kong & Taiwan	1,331	1.83%	India	42,875	0.99%
#5 country of origin	El Salvador	1,273	1.75%	Haiti	42,476	0.98%
#6 country of origin	Haiti	964	1.32%	El Salvador	28,388	0.65%
#7 country of origin	Nepal	774	1.06%	Vietnam	27,092	0.62%
#8 country of origin	Italy	585	0.80%	Guatemala	22,352	0.51%
#9 country of origin	Guatemala	549	0.75%	Canada	22,302	0.51%
#10 country of origin	Canada	390	0.54%	Cape Verde	18,651	0.43%
Limited English Proficiency (LEP) Language						
#1 LEP Language	Portuguese	2,852	3.92%	Spanish	151,176	3.48%
#2 LEP Language	Spanish	2,564	3.52%	Chinese	51,325	1.18%
#3 LEP Language	Chinese	817	1.12%	Portuguese	48,622	1.12%
#4 LEP Language	Other Indic Language	659	0.90%	French Creole	26,271	0.60%
#5 LEP Language	French Creole	438	0.60%	Vietnamese	18,720	0.43%
#6 LEP Language	Italian	298	0.41%	Russian	12,695	0.29%
#7 LEP Language	Other Asian Language	173	0.24%	Arabic	9,967	0.23%
#8 LEP Language	Vietnamese	167	0.23%	Cambodian	9,558	0.22%
#9 LEP Language	Arabic	154	0.21%	French	8,788	0.20%
#10 LEP Language	Greek	143	0.20%	Italian	8,613	0.20%
Disability Type						
Hearing difficulty		1,707	2.35%		130,157	3.03%
Vision difficulty		1,168	1.61%		76,520	1.78%
Cognitive difficulty		2,295	3.16%		183,469	4.27%
Ambulatory difficulty		3,074	4.23%		231,880	5.40%
Self-care difficulty		1,331	1.83%		88,850	2.07%
Independent living difficulty		2,550	3.51%		168,656	3.93%
Sex						
Male		37,158	49.05%		2,202,868	48.39%
Female		38,596	50.95%		2,349,534	51.61%
Age						
Under 18		9,134	12.06%		983,268	21.60%
18-64		59,711	78.82%		2,973,091	65.31%
65+		6,909	9.12%		596,043	13.09%
Family Type						
Families with children		5,069	37.82%		501,830	45.55%
Note 1: All % represent a share of the total population within the Jurisdiction or region, except family type, which is out of total families.						
Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.						
Note 3: Data Sources: Decennial Census; ACS						
Note 4: Refer to the Data Documentation for details (www.hudexchange.info).						

Table 2 Demographic Trends –Demographic trend data for Jurisdiction and Region (including the number and percentage of persons by race/ethnicity, total national origin (foreign born), total LEP, sex, age range (under 18, 18-64, 65+), and households with children)

Table 2 - Demographic Trends

Race/Ethnicity	(Somerville, MA CDBG, HOME, ESG) Jurisdiction								(Boston-Cambridge-Newton, MA-NH) Region							
	1990 Trend		2000 Trend		2010 Trend		Current		1990 Trend		2000 Trend		2010 Trend		Current	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
White, Non-Hispanic	64,287	84.33%	56,349	72.68%	52,359	69.12%	52,359	69.12%	3,589,171	86.83%	3,544,912	80.72%	3,408,585	74.87%	3,408,584	74.87%
Black, Non-Hispanic	3,977	5.22%	5,846	7.54%	5,587	7.38%	4,869	6.43%	215,401	5.21%	279,328	6.36%	337,751	7.42%	301,533	6.62%
Hispanic	4,768	6.25%	6,774	8.74%	8,017	10.58%	8,017	10.58%	189,345	4.58%	281,256	6.40%	410,516	9.02%	410,516	9.02%
Asian or Pacific Islander, Non-Hispanic	2,786	3.65%	5,500	7.09%	7,403	9.77%	6,594	8.70%	116,922	2.83%	219,564	5.00%	323,622	7.11%	293,833	6.45%
Native American, Non-Hispanic	96	0.13%	295	0.38%	305	0.40%	90	0.12%	5,815	0.14%	14,547	0.33%	16,406	0.36%	6,347	0.14%
National Origin																
Foreign-born	16,981	22.28%	22,725	29.32%	20,140	26.59%	19,281	25.45%	427,497	10.34%	602,072	13.71%	731,051	16.06%	771,071	16.94%
LEP																
Limited English Proficiency	8,925	11.71%	12,439	16.05%	7,768	10.25%	9,254	12.22%	233,541	5.65%	327,367	7.45%	381,259	8.37%	402,577	8.84%
Sex																
Male	36,295	47.62%	37,669	48.59%	37,158	49.05%	37,158	49.05%	1,987,545	48.09%	2,119,857	48.27%	2,202,868	48.39%	2,202,868	48.39%
Female	39,925	52.38%	39,850	51.41%	38,596	50.95%	38,596	50.95%	2,145,517	51.91%	2,271,476	51.73%	2,349,534	51.61%	2,349,534	51.61%
Age																
Under 18	11,635	15.26%	11,663	15.05%	9,134	12.06%	9,134	12.06%	909,015	21.99%	1,055,372	24.03%	983,268	21.60%	983,268	21.60%
18-64	55,261	72.50%	57,791	74.55%	59,711	78.82%	59,711	78.82%	2,703,316	65.41%	2,782,481	63.36%	2,973,091	65.31%	2,973,091	65.31%
65+	9,325	12.23%	8,066	10.41%	6,909	9.12%	6,909	9.12%	520,730	12.60%	553,479	12.60%	596,043	13.09%	596,043	13.09%
Family Type																
Families with children	6,276	38.99%	3,508	37.91%	5,069	37.82%	5,069	37.82%	470,587	45.62%	288,783	48.32%	501,830	45.55%	501,830	45.55%

Note 1: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Note 2: Data Sources: Decennial Census; ACS

Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

Table 3 Racial/Ethnic Dissimilarity –Race/ethnicity dissimilarity index for Jurisdiction and Region

Table 3 - Racial/Ethnic Dissimilarity Trends

Racial/Ethnic Dissimilarity Index	(Somerville, MA CDBG, HOME, ESG) Jurisdiction				(Boston-Cambridge-Newton, MA-NH) Region			
	1990 Trend	2000 Trend	2010 Trend	Current	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	17.06	20.76	24.93	31.48	55.80	53.90	49.76	53.49
Black/White	21.25	25.49	29.99	37.79	68.56	66.00	61.50	66.41
Hispanic/White	22.49	34.09	39.15	44.29	59.38	62.55	59.58	61.40
Asian or Pacific Islander/White	14.64	14.40	14.48	21.03	45.55	46.10	43.43	47.78

Note 1: Data Sources: Decennial Census

Note 2: Refer to the Data Documentation for details (www.hudexchange.info).

Table 4 R/ECAP Demographics –Data for the percentage of racial/ethnic groups, families with children, and national origin groups (10 most populous) for the Jurisdiction and Region who reside in R/ECAPs

Table 4 - R/ECAP Demographics

	(Somerville, MA CDBG, HOME, ESG) Jurisdiction		(Boston-Cambridge-Newton, MA-NH) Region	
R/ECAP Race/Ethnicity	#	%	#	%
Total Population in R/ECAPs	0	-	116,156	-
White, Non-Hispanic	0	N/a	23,780	20.47%
Black, Non-Hispanic	0	N/a	29,547	25.44%
Hispanic	0	N/a	47,375	40.79%
Asian or Pacific Islander, Non-Hispanic	0	N/a	10,290	8.86%
Native American, Non-Hispanic	0	N/a	313	0.27%
Other, Non-Hispanic	0	N/a	2,229	1.92%
R/ECAP Family Type				
Total Families in R/ECAPs	0	-	23,968	-
Families with children	0	N/a	13,280	55.41%
R/ECAP National Origin				
Total Population in R/ECAPs	0	-	116,156	-
#1 country of origin	Null	0 0.00%	Dominican Republic	14,741 12.69%
#2 country of origin	Null	0 0.00%	China excl. Hong Kong & Taiwan	4,366 3.76%
#3 country of origin	Null	0 0.00%	Haiti	2,586 2.23%
#4 country of origin	Null	0 0.00%	Cape Verde	1,338 1.15%
#5 country of origin	Null	0 0.00%	El Salvador	1,193 1.03%
#6 country of origin	Null	0 0.00%	Guatemala	1,177 1.01%
#7 country of origin	Null	0 0.00%	Jamaica	798 0.69%
#8 country of origin	Null	0 0.00%	Vietnam	773 0.67%
#9 country of origin	Null	0 0.00%	India	747 0.64%
#10 country of origin	Null	0 0.00%	Cambodia	734 0.63%

Note 1: 10 most populous groups at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.

Note 2: Data Sources: Decennial Census; ACS

Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

Table 5 Publicly Supported Housing Units by Program Category – Data for total units by 4 categories of publicly supported housing in the Jurisdiction (Public Housing, Project-Based Section 8, Other Multifamily, Housing Choice Voucher (HCV) Program) for the Jurisdiction

Table 5 - Publicly Supported Housing Units by Program Category

	(Somerville, MA CDBG, HOME, ESG) Jurisdiction	
Housing Units	#	%
Total housing units	33,720	-
Public Housing	583	1.73%
Project-based Section 8	1,088	3.23%
Other Multifamily	61	0.18%
HCV Program	781	2.32%

Note 1: Data Sources: Decennial Census; APSH

Note 2: Refer to the Data Documentation for details (www.hudexchange.info).

Table 6 Publicly Supported Households by Race/Ethnicity – Race/ethnicity data for 4 categories of publicly supported housing (Public Housing, Project-Based Section 8, Other Multifamily, HCV) in the Jurisdiction compared to the population as a whole, and to persons earning 30% AMI, in the Jurisdiction

Table 6 - Publicly Supported Households by Race/Ethnicity

(Somerville, MA CDBG, HOME, ESG) Jurisdiction	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Housing Type								
Public Housing	325	56.62%	133	23.17%	86	14.98%	30	5.23%
Project-Based Section 8	615	60.24%	211	20.67%	116	11.36%	76	7.44%
Other Multifamily	22	84.62%	4	15.38%	0	0.00%	0	0.00%
HCV Program	462	63.20%	147	20.11%	113	15.46%	5	0.68%
Total Households	24,640	78.17%	1,588	5.04%	2,205	7.00%	2,374	7.53%
0-30% of AMI	3,505	67.79%	579	11.20%	580	11.22%	370	7.16%
0-50% of AMI	5,310	60.55%	829	9.45%	950	10.83%	624	7.12%
0-80% of AMI	8,465	66.00%	1,034	8.06%	1,155	9.01%	984	7.67%
(Boston-Cambridge-Newton, MA-NH) Region	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	8,192	36.45%	5,754	25.61%	6,339	28.21%	2,145	9.55%
Project-Based Section 8	13,925	40.88%	7,008	20.57%	9,421	27.66%	3,605	10.58%
Other Multifamily	1,626	63.02%	431	16.71%	329	12.75%	187	7.25%
HCV Program	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Total Households	1,388,020	79.06%	109,814	6.25%	126,940	7.23%	99,401	5.66%
0-30% of AMI	175,030	63.64%	31,205	11.35%	42,425	15.43%	19,725	7.17%
0-50% of AMI	262,205	55.87%	48,930	10.43%	65,075	13.87%	29,019	6.18%
0-80% of AMI	415,335	61.81%	65,779	9.79%	83,380	12.41%	39,024	5.81%

Note 1: Data Sources: Decennial Census; APSH; CHAS
 Note 2: #s presented are numbers of households not individuals.
 Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

Table 7 R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category – Data on publicly supported housing units and R/ECAPs for the Jurisdiction

Table 7 - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category

(Somerville, MA CDBG, HOME, ESG) Jurisdiction	Total # units (occupied)	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children	% Elderly	% with a disability
Public Housing								
R/ECAP tracts	N/a	N/a	0.00%	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	580	56.62%	23.17%	14.98%	5.23%	21.51%	50.09%	30.81%
Project-based Section 8								
R/ECAP tracts	N/a	N/a	0.00%	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	1,022	60.24%	20.67%	11.36%	7.44%	12.70%	62.65%	22.22%
Other HUD Multifamily								
R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	30	84.62%	15.38%	0.00%	0.00%	0.00%	50.00%	0.00%
HCV Program								
R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	737	63.20%	20.11%	15.46%	0.68%	27.47%	31.47%	31.87%

Note 1: Disability information is only reported for heads of household or spouse or head only. Note: the data reflect information on all members of the household.
 Note 2: Data Sources: APSH
 Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

Table 8 Demographics of Publicly Supported Housing Developments by Program Category –
 Development level demographics by Public Housing, Project-Based Section 8, and Other Multifamily[1]
 for the Jurisdiction

Table 8 - Demographics of Publicly Supported Housing Developments, by Program Category

Public Housing (Somerville, MA CDBG) Jurisdiction								
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
Brady Towers	MA031	Somerville Housin	368	76%	15%	5%	3%	N/a
Mystic View Apt	MA031	Somerville Housin	215	22%	37%	32%	9%	59%

Project-Based Section 8 (Somerville, MA CDBG) Jurisdiction								
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
Mt Pleasant Apts-Somervl	N/a	N/a	65	62%	21%	11%	5%	3%
Somerville Ma06h052013	N/a	N/a	134	64%	17%	12%	5%	N/a
Somerville Ma06h052038	N/a	N/a	24	67%	14%	14%	5%	14%
Clarendon Hill Towers	N/a	N/a	347	48%	40%	8%	4%	38%
Mt. Vernon Iii	N/a	N/a	7	N/a	N/a	N/a	N/a	N/a
Mt. Vernon I	N/a	N/a	8	N/a	N/a	N/a	N/a	N/a
B F Faulkner Tower	N/a	N/a	130	73%	12%	9%	6%	N/a
Cobble Hill Apts	N/a	N/a	223	59%	3%	21%	18%	0%
Center House	N/a	N/a	9	N/a	N/a	N/a	N/a	N/a
Mt. Vernon Ii	N/a	N/a	8	N/a	N/a	N/a	N/a	N/a
Pearl Street 219-221	N/a	N/a	6	N/a	N/a	N/a	N/a	N/a
Walnut Street 110	N/a	N/a	12	33%	33%	33%	N/a	34%
Walnut Street Center	N/a	N/a	30	89%	11%	0%	N/a	N/a
Pearl Street Park	N/a	N/a	85	73%	15%	6%	6%	N/a

Other HUD Multifamily Assisted Housing (Somerville, MA CDBG) Jurisdiction								
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
Broadway	N/a	N/a	8	N/a	N/a	N/a	N/a	N/a
Pearl	N/a	N/a	9	N/a	N/a	N/a	N/a	N/a
Somerville Place	N/a	N/a	8	N/a	N/a	N/a	N/a	N/a
Vna Senior Living Community	N/a	N/a	31	79%	14%	3%	3%	N/a
Jackson Road	N/a	N/a	5	N/a	N/a	N/a	N/a	N/a

Note 1: For LIHTC properties, this information will be supplied by local knowledge.

Note 2: Percentages may not add to 100 due to rounding error.

Note 3: Data Sources: APSH

[Note 4: Refer to the Data Documentation for details \(www.hudexchange.info\).](http://www.hudexchange.info)

Table 9 Demographics of Households with Disproportionate Housing Needs – Tabular data of total households in the Jurisdiction and Region and the total number and percentage of households experiencing one or more housing burdens by race/ethnicity and family size in the Jurisdiction and Region

Table 9 - Demographics of Households with Disproportionate Housing Needs

Disproportionate Housing Needs	(Somerville, MA CDBG, HOME, ESG) Jurisdiction			(Boston-Cambridge-Newton, MA-NH) Region		
	# with problems	# households	% with problems	# with problems	# households	% with problems
Households experiencing any of 4 housing problems						
Race/Ethnicity						
White, Non-Hispanic	8,895	24,640	36.10%	484,020	1,388,020	34.87%
Black, Non-Hispanic	859	1,588	54.09%	57,645	109,814	52.49%
Hispanic	1,230	2,205	55.78%	70,270	126,940	55.36%
Asian or Pacific Islander, Non-Hispanic	940	2,374	39.60%	39,834	99,401	40.07%
Native American, Non-Hispanic	19	43	44.19%	1,027	1,994	51.50%
Other, Non-Hispanic	319	664	48.04%	13,496	29,510	45.73%
Total	12,265	31,520	38.91%	666,290	1,755,660	37.95%
Household Type and Size						
Family households, <5 people	4,565	12,774	35.74%	309,885	964,390	32.13%
Family households, 5+ people	805	1,535	52.44%	60,005	147,135	40.78%
Non-family households	6,890	17,205	40.05%	296,425	644,190	46.02%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	4,175	24,640	16.94%	223,925	1,388,020	16.13%
Black, Non-Hispanic	409	1,588	25.76%	31,835	109,814	28.99%
Hispanic	700	2,205	31.75%	40,905	126,940	32.22%
Asian or Pacific Islander, Non-Hispanic	539	2,374	22.70%	22,474	99,401	22.61%
Native American, Non-Hispanic	19	43	44.19%	624	1,994	31.29%
Other, Non-Hispanic	149	664	22.44%	7,303	29,510	24.75%
Total	5,995	31,520	19.02%	327,085	1,755,660	18.63%
Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.						
Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.						
Note 3: Data Sources: CHAS						
Note 4: Refer to the Data Documentation for details (www.hudexchange.info).						

Table 10 Demographics of Households with Severe Housing Cost Burden – Data of the total number of households in the Jurisdiction and Region and the number and percentage of households experiencing severe housing burdens by race/ethnicity for the Jurisdiction and Region

Table 10 - Demographics of Households with Severe Housing Cost Burden

Households with Severe Housing Cost Burden	(Somerville, MA CDBG, HOME, ESG) Jurisdiction			(Boston-Cambridge-Newton, MA-NH) Region		
	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
Race/Ethnicity						
White, Non-Hispanic	3,905	24,640	15.85%	208,025	1,388,020	14.99%
Black, Non-Hispanic	320	1,588	20.15%	27,370	109,814	24.92%
Hispanic	445	2,205	20.18%	33,105	126,940	26.08%
Asian or Pacific Islander, Non-Hispanic	480	2,374	20.22%	17,315	99,401	17.42%
Native American, Non-Hispanic	19	43	44.19%	470	1,994	23.57%
Other, Non-Hispanic	130	664	19.58%	6,235	29,510	21.13%
Total	5,299	31,520	16.81%	292,520	1,755,660	16.66%
Household Type and Size						
Family households, <5 people	1,600	12,774	12.53%	125,838	964,390	13.05%
Family households, 5+ people	295	1,535	19.22%	16,848	147,135	11.45%
Non-family households	3,400	17,205	19.76%	149,879	644,190	23.27%
Note 1: Severe housing cost burden is defined as greater than 50% of income.						
Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.						
Note 3: The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.						
Note 4: Data Sources: CHAS						
Note 5: Refer to the Data Documentation for details (www.hudexchange.info).						

Table 11 Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children – Data on the number of bedrooms for units of 4 categories of publicly supported housing (Public Housing, Project-Based Section 8, Other Multifamily, HCV) for the Jurisdiction

Table 11 - Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children

(Somerville, MA CDBG, HOME, ESG) Jurisdiction								
Housing Type	Households in 0-1 Bedroom		Households in 2 Bedroom		Households in 3+ Bedroom		Households with Children	
	Units		Units		Units			
	#	%	#	%	#	%	#	%
Public Housing	389	66.95%	93	16.01%	97	16.70%	125	21.51%
Project-Based Section 8	776	72.46%	223	20.82%	31	2.89%	136	12.70%
Other Multifamily	29	50.00%	0	0.00%	0	0.00%	0	0.00%
HCV Program	356	47.47%	237	31.60%	138	18.40%	206	27.47%

Note 1: Data Sources: APSH
 Note 2: Refer to the Data Documentation for details (www.hudexchange.info).

Table 12 Opportunity Indicators by Race/Ethnicity – Data of opportunity indices for school proficiency, jobs proximity, labor-market engagement, transit trips, low transportation costs, low poverty, and environmental health for the Jurisdiction and Region by race/ethnicity and among households below the Federal poverty line.

Table 12 - Opportunity Indicators, by Race/Ethnicity

(Somerville, MA CDBG, HOME, ESG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	61.79	42.43	87.04	95.85	96.77	41.16	27.77
Black, Non-Hispanic	49.21	29.68	79.50	95.75	96.96	35.08	28.94
Hispanic	47.67	26.27	76.58	95.69	97.14	39.58	27.76
Asian or Pacific Islander, Non-Hispanic	58.27	36.20	83.87	95.79	96.88	39.06	27.84
Native American, Non-Hispanic	57.60	35.01	82.17	95.81	97.13	41.29	27.33
Population below federal poverty line							
White, Non-Hispanic	58.78	41.39	85.90	95.83	96.69	40.63	27.24
Black, Non-Hispanic	35.11	23.54	65.49	95.73	97.40	37.36	30.24
Hispanic	46.28	26.10	76.79	95.79	97.15	44.84	30.49
Asian or Pacific Islander, Non-Hispanic	52.26	38.56	83.94	95.78	96.48	40.24	28.25
Native American, Non-Hispanic	32.00	16.00	81.00	96.00	98.00	59.68	N/a
(Boston-Cambridge-Newton, MA-NH) Region							
Total Population							
White, Non-Hispanic	74.28	53.78	77.06	77.22	83.13	47.54	63.80
Black, Non-Hispanic	43.66	31.23	48.18	90.61	91.15	37.82	49.43
Hispanic	41.62	34.78	49.50	90.72	91.58	50.65	47.04
Asian or Pacific Islander, Non-Hispanic	62.87	49.64	72.29	87.05	89.18	41.22	53.01
Native American, Non-Hispanic	59.20	40.69	62.51	81.45	86.00	44.96	60.36
Population below federal poverty line							
White, Non-Hispanic	61.99	49.86	70.00	83.67	87.28	46.70	56.60
Black, Non-Hispanic	31.27	26.93	41.28	93.21	93.66	37.51	43.45
Hispanic	30.12	31.58	41.38	93.05	93.29	53.71	42.86
Asian or Pacific Islander, Non-Hispanic	45.66	41.77	61.75	92.26	93.57	44.32	42.30
Native American, Non-Hispanic	39.21	39.89	62.23	90.80	93.13	45.43	45.99

Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA
 Note 2: Refer to the Data Documentation for details (www.hudexchange.info).

Table 13 Disability by Type – Data of persons with vision, hearing, cognitive, ambulatory, self-care, and independent living disabilities for the Jurisdiction and Region

Table 13 - Disability by Type

Disability Type	(Somerville, MA CDBG, HOME, ESG) Jurisdiction		(Boston-Cambridge-Newton, MA-NH) Region	
	#	%	#	%
Hearing difficulty	1,707	2.35%	130,157	3.03%
Vision difficulty	1,168	1.61%	76,520	1.78%
Cognitive difficulty	2,295	3.16%	183,469	4.27%
Ambulatory difficulty	3,074	4.23%	231,880	5.40%
Self-care difficulty	1,331	1.83%	88,850	2.07%
Independent living difficulty	2,550	3.51%	168,656	3.93%

Note 1: All % represent a share of the total population within the jurisdiction or region.
 Note 2: Data Sources: ACS
 Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

Table 14 Disability by Age Group – Data of persons with disabilities by age range (5-17, 18-64, and 65+) for the Jurisdiction and Region

Table 14 - Disability by Age Group

Age of People with Disabilities	(Somerville, MA CDBG, HOME, ESG) Jurisdiction		(Boston-Cambridge-Newton, MA-NH) Region	
	#	%	#	%
age 5-17 with Disabilities	217	0.30%	37,062	0.86%
age 18-64 with Disabilities	3,188	4.39%	231,345	5.39%
age 65+ with Disabilities	2,693	3.71%	197,644	4.60%

Note 1: All % represent a share of the total population within the jurisdiction or region.
 Note 2: Data Sources: ACS
 Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

Table 15 Disability by Publicly Supported Housing Program Category – Data on disability and publicly supported housing for the Jurisdiction and Region

Table 15 - Disability by Publicly Supported Housing Program Category

(Somerville, MA CDBG, HOME, ESG)		
Jurisdiction	People with a Disability	
	#	%
Public Housing	179	30.81%
Project-Based Section 8	238	22.22%
Other Multifamily	0	0.00%
HCV Program	239	31.87%
(Boston-Cambridge-Newton, MA-NH)		
Region		
Public Housing	8,137	35.78%
Project-Based Section 8	6,193	17.69%
Other Multifamily	330	10.97%
HCV Program	N/a	N/a
<p>Note 1: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.</p> <p>Note 2: Data Sources: ACS</p> <p><u>Note 3: Refer to the Data Documentation for details (www.hudexchange.info).</u></p>		

Table 16 – Homeownership and Rental Rates by Race/Ethnicity – Data of homeownership and rental rates by race/ethnicity for the Jurisdiction and Region

Table 16 - Homeownership and Rental Rates by Race/Ethnicity

Race/Ethnicity	(Somerville, MA CDBG, HOME, ESG)				(Boston-Cambridge-Newton, MA-NH)			
	Jurisdiction		Region		Homeowners		Renters	
	#	%	#	%	#	%	#	%
White, Non-Hispanic	9,370	86.24%	15,275	73.95%	954,555	87.97%	433,470	64.64%
Black, Non-Hispanic	300	2.76%	1,290	6.25%	36,800	3.39%	72,990	10.88%
Hispanic	355	3.27%	1,865	9.03%	32,590	3.00%	94,345	14.07%
Asian or Pacific Islander, Non-Hispanic	705	6.49%	1,670	8.09%	48,455	4.47%	50,940	7.60%
Native American, Non-Hispanic	4	0.04%	30	0.15%	775	0.07%	1,224	0.18%
Other, Non-Hispanic	125	1.15%	525	2.54%	11,880	1.09%	17,635	2.63%
Total Household Units	10,865	-	20,655	-	1,085,050	-	670,610	-
<p>Note 1: Data presented are numbers of households, not individuals.</p> <p>Note 2: Data Sources: CHAS</p> <p><u>Note 3: Refer to the Data Documentation for details (www.hudexchange.info).</u></p>								

APPENDIX C – Contributing Factors Descriptions

Access to financial services *(Disparities in Access to Opportunity)*

The term “financial services” refers here to economic services provided by a range of quality organizations that manage money, including credit unions, banks, credit card companies, and insurance companies. These services would also include access to credit financing for mortgages, home equity, and home repair loans. Access to these services includes physical access - often dictated by the location of banks or other physical infrastructure - as well as the ability to obtain credit, insurance or other key financial services. Access may also include equitable treatment in receiving financial services, including equal provision of information and equal access to mortgage modifications. For purposes of this contributing factor, financial services do not include predatory lending including predatory foreclosure practices, storefront check cashing, payday loan services, and similar services. Gaps in banking services can make residents vulnerable to these types of predatory lending practices, and lack of access to quality banking and financial services may jeopardize an individual’s credit and the overall sustainability of homeownership and wealth accumulation.

Access for persons with disabilities to proficient schools *(Disability and Access)*

Individuals with disabilities may face unique barriers to accessing proficient schools. In some jurisdictions, some school facilities may not be accessible or may only be partially accessible to individuals with different types of disabilities (often these are schools built before the enactment of the ADA or the Rehabilitation Act of 1973). In general, a fully accessible building is a building that complies with all of the ADA’s requirements and has no barriers to entry for persons with physical mobility impairments. It enables students and parents with physical or sensory disabilities to access and use all areas of the building and facilities to the same extent as students and parents without disabilities, enabling students with disabilities to attend classes and interact with students without disabilities to the fullest extent. In contrast, a partially accessible building allows for persons with physical mobility impairments to enter and exit the building, access all relevant programs, and have use of at least one restroom, but the entire building is not accessible and students or parents with disabilities may not access areas of the facility to the same extent as students and parents without disabilities. In addition, in some instances school policies steer individuals with certain types of disabilities to certain facilities or certain programs or certain programs do not accommodate the disability-related needs of certain students.

Access to publicly supported housing for persons with disabilities *(Disability and Access)*

The lack of a sufficient number of accessible units or lack of access to key programs and services poses barriers to individuals with disabilities seeking to live in publicly supported housing. For purposes of this assessment, publicly supported housing refers to housing units that are subsidized by federal, state, or local entities. “Accessible housing” refers to housing that accords individuals with disabilities equal opportunity to use and enjoy a dwelling. The concept of “access” here includes physical access for individuals with different types of disabilities (for example, ramps and other accessibility features for individuals with physical mobility impairments, visual alarms and signals for individuals who are deaf or hard of hearing, and audio signals, accessible signage, and other accessibility features for individuals who are blind or have low vision), as well as the provision of auxiliary aids and services to provide effective communication for individuals who are deaf or hard of hearing, are blind or have low vision, or individuals who have speech impairments. The concept of “access” here also includes programmatic

access, which implicates such policies as application procedures, waitlist procedures, transfer procedures and reasonable accommodation procedures.

Access to transportation for persons with disabilities (*Disability and Access*)

Individuals with disabilities may face unique barriers to accessing transportation, including both public and private transportation, such as buses, rail services, taxis, and para-transit. The term “access” in this context includes physical accessibility, policies, physical proximity, cost, safety, reliability, etc. It includes the lack of accessible bus stops, the failure to make audio announcements for persons who are blind or have low vision, and the denial of access to persons with service animals. The absence of or clustering of accessible transportation and other transportation barriers may limit the housing choice of individuals with disabilities.

Admissions and occupancy policies and procedures, including preferences in publicly supported housing (*Publicly Supported Housing*)

The term “admissions and occupancy policies and procedures” refers here to the policies and procedures used by publicly supported housing providers that affect who lives in the housing, including policies and procedures related to marketing, advertising vacancies, applications, tenant selection, assignment, and maintained or terminated occupancy. Procedures that may relate to fair housing include, but are not limited to:

- Admissions preferences (e.g. residency preference, preferences for local workforce, etc.)
- Application, admissions, and waitlist policies (e.g. in-person application requirements, rules regarding applicant acceptance or rejection of units, waitlist time limitations, first come first serve, waitlist maintenance, etc.).
- Income thresholds for new admissions or for continued eligibility.
- Designations of housing developments (or portions of developments) for the elderly and/or persons with disabilities.
- Occupancy limits.
- Housing providers’ policies for processing reasonable accommodations and modifications requests.
- Credit policies.
- Policies related to criminal records including arrests and convictions
- Eviction policies and procedures.

Availability of affordable units in a range of sizes (*Disproportionate Housing Needs*)

The provision of affordable housing is often important to individuals with certain protected characteristics because groups are disproportionately represented among those who would benefit from low-cost housing. What is “affordable” varies by circumstance, but an often used rule of thumb is that a low- or moderate-income family can afford to rent or buy a decent-quality dwelling without spending more than

30 percent of its income. This contributing factor refers to the availability of units that a low- or moderate-income family could rent or buy, including one-bedroom units and multi-bedroom units for larger families. When considering availability, consider transportation costs, school quality, and other important factors in housing choice. Whether affordable units are available with a greater number of bedrooms and in a range of different geographic locations may be a particular barrier facing families with children.

Availability, type, frequency, and reliability of public transportation (*Disparities in Access to Opportunity*)

Public transportation is shared passenger transport service available for use by the general public, including buses, light rail, and rapid transit. Public transportation includes paratransit services for persons with disabilities. The availability, type, frequency, and reliability of public transportation affect which households are connected to community assets and economic opportunities. Transportation policies that are premised upon the use of a personal vehicle may impact public transportation. “Availability” as used here includes geographic proximity, cost, safety and accessibility, as well as whether the transportation connects individuals to places they need to go such as jobs, schools, retail establishments, and healthcare. “Type” refers to method of transportation such as bus or rail. “Frequency” refers to the interval at which the transportation runs. “Reliability” includes such factors as an assessment of how often trips are late or delayed, the frequency of outages, and whether the transportation functions in inclement weather.

Community opposition (*Segregation/Integration, R/ECAPs, Publicly Supported Housing*)

The opposition of community members to proposed or existing developments—including housing developments, affordable housing, publicly supported housing (including use of housing choice vouchers), multifamily housing, or housing for persons with disabilities—is often referred to as “Not in my Backyard,” or NIMBY-ism. This opposition is often expressed in protests, challenges to land-use requests or zoning waivers or variances, lobbying of decision-making bodies, or even harassment and intimidation. Community opposition can be based on factual concerns (concerns are concrete and not speculative, based on rational, demonstrable evidence, focused on measurable impact on a neighborhood) or can be based on biases (concerns are focused on stereotypes, prejudice, and anxiety about the new residents or the units in which they will live). Community opposition, when successful at blocking housing options, may limit or deny housing choice for individuals with certain protected characteristics.

Deteriorated and abandoned properties (*R/ECAPS*)

The term “deteriorated and abandoned properties” refers here to residential and commercial properties unoccupied by an owner or a tenant, which are in disrepair, unsafe, or in arrears on real property taxes. Deteriorated and abandoned properties may be signs of a community’s distress and disinvestment and are often associated with crime, increased risk to health and welfare, plunging decreasing property values, and municipal costs. The presence of multiple unused or abandoned properties in a particular neighborhood may have resulted from mortgage or property tax foreclosures. The presence of such properties can raise serious health and safety concerns and may also affect the ability of homeowners with protected characteristics to access opportunity through the accumulation of home equity. Demolition without strategic revitalization and investment can result in further deterioration of already damaged neighborhoods.

Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking (*Disproportionate Housing Needs, Publicly Supported Housing*)

Federal laws, such as the Violence Against Women Act (VAWA) and the Fair Housing Act (FHA), offer protections from housing discrimination to survivors of domestic violence, dating violence, sexual assault, and stalking because of the abuse committed against them. Despite these safeguards, many victims continue to experience adverse housing decisions made by housing providers due to their status as victims. Though some states and local jurisdictions may have housing laws that are designed to protect victims, many do not, which impedes victims' ability to access and maintain their current housing as well as quickly find safe alternative housing. Local nuisance and crime-free ordinances that punish victims of crime or who otherwise need emergency assistance can violate federal and state civil rights laws.

Displacement of residents due to economic pressures (*Segregation/Integration, R/ECAPs, Disproportionate Housing Needs, Publicly Supported Housing*)

The term "displacement" refers here to a resident's undesired departure from a place where an individual has been living. "Economic pressures" may include, but are not limited to, rising rents, rising property taxes related to home prices, rehabilitation of existing structures, demolition of subsidized housing, loss of affordability restrictions, and public and private investments in neighborhoods. Such pressures can lead to loss of existing affordable housing in areas experiencing rapid economic growth and a resulting loss of access to opportunity assets for lower income families that previously lived there. Where displacement disproportionately affects persons with certain protected characteristic, the displacement of residents due to economic pressures may exacerbate patterns of residential segregation.

Impediments to mobility (*Disparities in Access to Opportunity, Publicly Supported Housing*)

The term "impediments to mobility" refers here to barriers faced by individuals and families when attempting to move to a neighborhood or area of their choice, especially integrated areas and areas of opportunity. This refers to both Housing Choice Vouchers and other public and private housing options. Many factors may impede mobility, including, but not limited to:

- Lack of quality mobility counseling. Mobility counseling is designed to assist families in moving from high-poverty to low-poverty neighborhoods that have greater access to opportunity assets appropriate for each family (e.g. proficient schools for families with children or effective public transportation). Mobility counseling can include a range of options including, assistance for families for "second moves" after they have accessed stable housing, and ongoing post-move support for families.
- Lack of appropriate payment standards, including exception payment standards to the standard fair market rent (FMR). Because FMRs are generally set at the 40th percentile of the metropolitan-wide rent distribution, some of the most desirable neighborhoods do not have a significant number of units available in the FMR range. Exception payment standards are separate payment standard amounts within the basic range for a designated part of an FMR area. Small areas FMRs, which vary by zip code, may be used in the determination of potential exception payment standard levels to support a greater range of payment standards.
- Jurisdictional fragmentation among multiple providers of publicly supported housing that serve single metropolitan areas and lack of regional cooperation mechanisms, including PHA jurisdictional limitations.

- HCV portability issues that prevent a household from using a housing assistance voucher issued in one jurisdiction when moving to another jurisdiction where the program is administered by a different local PHA.
- Lack of a consolidated waitlist for all assisted housing available in the metropolitan area.
- Discrimination based on source of income, including SSDI, Housing Choice Vouchers, or other tenant-based rental assistance.
- Lack of source of income protection or discrimination based on source of income, including SSDI, Housing Choice Vouchers, or other tenant-based rental assistance.

Inaccessible public or private infrastructure (*Disability and Access*)

Many public buildings, sidewalks, pedestrian crossings, or other infrastructure components are inaccessible to individuals with disabilities including persons with physical mobility impairments, individuals who are deaf or hard of hearing, and persons who are blind or have low vision. These accessibility issues can limit realistic housing choice for individuals with disabilities. Inaccessibility is often manifest by the lack of curb cuts, lack of ramps, and the lack of audible pedestrian signals. While the Americans with Disabilities Act and related civil rights laws establish accessibility requirements for infrastructure, these laws do not apply everywhere and/or may be inadequately enforced.

Inaccessible government facilities or services (*Disability and Access*)

Inaccessible government facilities and services may pose a barrier to fair housing choice for individuals with disabilities by limiting access to important community assets such as public meetings, social services, libraries, and recreational facilities. Note that the concept of accessibility includes both physical access (including to websites and other forms of communication) as well as policies and procedures. While the Americans with Disabilities Act and related civil rights laws require that newly constructed and altered government facilities, as well as programs and services, be accessible to individuals with disabilities, these laws may not apply in all circumstances and/or may be inadequately enforced.

Lack of access to opportunity due to high housing costs (*Disparities in Access to Opportunity, Disproportionate Housing Needs, Publicly Supported Housing, Disability and Access*)

Housing that affords access to opportunities, such as proficient schools, public transportation, employment centers, low poverty, and environmentally healthy neighborhoods may be cost prohibitive for low income persons, including those receiving assistance through the Housing Choice Voucher program. High costs can have a greater effect on families with children who need multiple bedrooms and individuals with disabilities who need accessible housing or housing located close to accessible transportation. Lack of strategies to overcome barriers imposed by housing costs can deny access to opportunity. Such strategies may include Small Area fair market rents (FMRs), exception payment standards, siting of Project-Based Vouchers, buying down affordability of existing rental housing using HOME or LIHTC, inclusionary zoning (including when combined with ongoing affordability at voucher payment standards or acceptance of vouchers), and use of LIHTC for new construction of affordable housing opportunities.

Lack of affordable, accessible housing in a range of unit sizes *(Disability and Access)*

What is “affordable” varies by circumstance, but an often used rule of thumb is that a low- or moderate-income family can afford to rent or buy a decent-quality dwelling without spending more than 30 percent of its income. For purposes of this assessment, “accessible housing” refers to housing that accords individuals with disabilities equal opportunity to use and enjoy a dwelling. Characteristics that affect accessibility may include physical accessibility of units and public and common use areas of housing, as well as application procedures, such as first come first serve waitlists, inaccessible websites or other technology, denial of access to individuals with assistance animals, or lack of information about affordable accessible housing. The clustering of affordable, accessible housing with a range of unit sizes may also limit fair housing choice for individuals with disabilities.

Lack of affordable in-home or community-based supportive services *(Disability and Access)*

The term “in-home or community-based supportive services” refers here to medical and other supportive services available for targeted populations, such as individuals with mental illnesses, cognitive or developmental disabilities, and/or physical disabilities in their own home or community (as opposed to in institutional settings). Such services include personal care, assistance with housekeeping, transportation, in-home meal service, integrated adult day services and other services (including, but not limited to, medical, social, education, transportation, housing, nutritional, therapeutic, behavioral, psychiatric, nursing, personal care, and respite). They also include assistance with activities of daily living such as bathing, dressing, eating, and using the toilet, shopping, managing money or medications, and various household management activities, such as doing laundry. Public entities must provide services to individuals with disabilities in community settings rather than institutions when: 1) such services are appropriate to the needs of the individual; 2) the affected persons do not oppose community-based treatment; and 3) community-based services can be reasonably accommodated, taking into account the resources available to the public entity and the needs of others who are receiving disability-related services from the entity. Assessing the cost and availability of these services is also an important consideration, including the role of state Medicaid agencies. The outreach of government entities around the availability of community supports to persons with disabilities in institutions may impact these individuals’ knowledge of such supports and their ability to transition to community-based settings.

Lack of affordable, integrated housing for individuals who need supportive services *(Disability and Access)*

What is “affordable” varies by the circumstances affecting the individual, and includes the cost of housing and services taken together. Integrated housing is housing where individuals with disabilities can live and interact with persons without disabilities to the fullest extent possible. In its 1991 rulemaking implementing Title II of the ADA, the U.S. Department of Justice defined “the most integrated setting appropriate to the needs of qualified individuals with disabilities” as “a setting that enables individuals with disabilities to interact with non-disabled persons to the fullest extent possible.” By contrast, segregated settings are occupied exclusively or primarily by individuals with disabilities. Segregated settings sometimes have qualities of an institutional nature, including, but not limited to, regimentation in daily activities, lack of privacy or autonomy, policies limiting visitors, limits on individuals’ ability to engage freely in community activities and manage their own activities of daily living, or daytime activities primarily with other individuals with disabilities. For purposes of this tool “supportive

services” means medical and other voluntary supportive services available for targeted populations groups, such as individuals with mental illnesses, intellectual or developmental disabilities, and/or physical disabilities, in their own home or community (as opposed to institutional settings). Such services may include personal care, assistance with housekeeping, transportation, in-home meal service, integrated adult day services and other services. They also include assistance with activities of daily living such as bathing, dressing, and using the toilet, shopping, managing money or medications, and various household management activities, such as doing laundry.

Lack of assistance for housing accessibility modifications (*Disability and Access*)

The term “housing accessibility modification” refers here to structural changes made to existing premises, occupied or to be occupied by a person with a disability, in order to afford such person full enjoyment and use of the premises. Housing accessibility modifications can include structural changes to interiors and exteriors of dwellings and to common and public use areas. Under the Fair Housing Act, landlords are required by fair housing laws to permit certain reasonable modifications to a housing unit, but are not required to pay for the modification unless the housing provider is a recipient of Federal financial assistance and therefore subject to Section 504 of the Rehabilitation Act or is covered by the Americans with Disabilities Act (in such cases the recipient must pay for the structural modification as a reasonable accommodation for an individual with disabilities). However, the cost of these modifications can be prohibitively expensive. Jurisdictions may consider establishing a modification fund to assist individuals with disabilities in paying for modifications or providing assistance to individuals applying for grants to pay for modifications.

Lack of assistance for transitioning from institutional settings to integrated housing (*Disability and Access*)

The integration mandate of the ADA and *Olmstead v. L.C.*, 527 U.S. 581 (1999) (*Olmstead*) compels states to offer community-based health care services and long-term services and supports for individuals with disabilities who can live successfully in housing with access to those services and supports. In practical terms, this means that states must find housing that enables them to assist individuals with disabilities to transition out of institutions and other segregated settings and into the most integrated setting appropriate to the needs of each individual with a disability. A critical consideration in each state is the range of housing options available in the community for individuals with disabilities and whether those options are largely limited to living with other individuals with disabilities, or whether those options include substantial opportunities for individuals with disabilities to live and interact with individuals without disabilities. For further information on the obligation to provide integrated housing opportunities, please refer to HUD’s Statement on the Role of Housing in Accomplishing the Goals of *Olmstead*, the U.S. Department of Justice’s Statement on *Olmstead* Enforcement, as well as the U.S. Department of Health and Human Services’ Centers for Medicare and Medicaid Services final rule and regulations regarding Home and Community-Based Setting requirements. Policies that perpetuate segregation may include: inadequate community-based services; reimbursement and other policies that make needed services unavailable to support individuals with disabilities in mainstream housing; conditioning access to housing on willingness to receive supportive services; incentivizing the development or rehabilitation of segregated settings. Policies or practices that promote community integration may include: the administration of long-term State or locally-funded tenant-based rental assistance programs; applying for funds under the Section 811 Project Rental Assistance Demonstration; implementing special population

preferences in the HCV and other programs; incentivizing the development of integrated supportive housing through the LIHTC program; ordinances banning housing discrimination on the basis of source of income; coordination between housing and disability services agencies; increasing the availability of accessible public transportation.

Lack of community revitalization strategies (*Segregation/Integration, R/ECAPs*)

The term “community revitalization strategies” refers here to realistic planned activities to improve the quality of life in areas that lack public and private investment, services and amenities, have significant deteriorated and abandoned properties, or other indicators of community distress. Revitalization can include a range of activities such as improving housing, attracting private investment, creating jobs, and expanding educational opportunities or providing links to other community assets. Strategies may include such actions as rehabilitating housing; offering economic incentives for housing developers/sponsors, businesses (for commercial and employment opportunities), bankers, and other interested entities that assist in the revitalization effort; and securing financial resources (public, for-profit, and nonprofit) from sources inside and outside the jurisdiction to fund housing improvements, community facilities and services, and business opportunities in neighborhoods in need of revitalization. When a community is being revitalized, the preservation of affordable housing units can be a strategy to promote integration.

Lack of local private fair housing outreach and enforcement (*Fair Housing Enforcement, Outreach Capacity, and Resources Analysis*)

The term “local private fair housing outreach and enforcement” refers to outreach and enforcement actions by private individuals and organizations, including such actions as fair housing education, conducting testing, bring lawsuits, arranging and implementing settlement agreements. A lack of private enforcement is often the result of a lack of resources or a lack of awareness about rights under fair housing and civil rights laws, which can lead to under-reporting of discrimination, failure to take advantage of remedies under the law, and the continuation of discriminatory practices. Activities to raise awareness may include technical training for housing industry representatives and organizations, education and outreach activities geared to the general public, advocacy campaigns, fair housing testing and enforcement. Examples of activities, among others, these civil rights organizations undertake may include: outreach, education, and training on fair housing issues such as the appropriate application of arrest and criminal conviction records, credit policies, and prior evictions in leasing and lease termination decision making; and fair housing issues affecting LGBT individuals, the application of any state or local law providing specific protection for such individuals, as well as compliance with HUD regulations and guidance relating to such individuals.

Lack of local public fair housing enforcement (*Fair Housing Enforcement, Outreach Capacity, and Resources Analysis*)

The term “local public fair housing enforcement” refers here to enforcement actions by State and local agencies or non-profits charged with enforcing fair housing laws, including testing, lawsuits, settlements, and fair housing audits. A lack of enforcement is a failure to enforce existing requirements under state or local fair housing laws. This may be assessed by reference to the nature, extent, and disposition of housing discrimination complaints filed in the jurisdiction.

Lack of local or regional cooperation (*Segregation, R/ECAPs, Disparities in Opportunity, Publicly Supported Housing, Disability and Access*)

The term “local or regional cooperation” refers here to formal networks or coalitions of organizations, people, and entities working together to plan for local or regional development. Cooperation in local or regional planning can be a useful approach to coordinate responses to identified fair housing issues and contributing factors because fair housing issues and contributing factors not only cross multiple sectors—including housing, education, transportation, and commercial and economic development—but these issues are often not constrained by political-geographic boundaries. When there are local or regional patterns in segregation or R/ECAP, access to opportunity, disproportionate housing needs, or the concentration of affordable housing there may be a lack of local or regional cooperation and fair housing choice may be restricted.

Lack of meaningful language access for individuals with limited English proficiency (*Publicly Supported Housing*)

A limited English proficient (LEP) person is anyone, who due to national origin, does not speak English as his/her primary language and who has a limited ability to read, write, speak, or understand English, or who speaks English “less than very well.” Public housing agencies (PHAs) and other federally-assisted housing providers have obligations under Title VI of the Civil Rights of 1964 as well as other federal and related state legal authorities not to discriminate against housing applicants and tenants who are LEP. Both HUD and USDA Rural Development have issued LEP guidance outlining a series of steps that certain recipients of HUD and RD funding should take to further Title VI compliance. These steps include conducting a four-factor analysis to assess the need for language assistance; creating a language assistance plan based on the findings of the four-factor analysis; translating documents (i.e., those documents necessary to ensure meaningful access); and offering oral interpretation, if needed. HUD has further recognized the relationship between national origin discrimination and limited English proficiency under the Fair Housing Act through administrative enforcement. Therefore, private housing providers who discriminate against prospective or existing tenants who are LEP on the basis of national origin may violate the Fair Housing Act.

Lack of private investment in specific neighborhoods (*Segregation, R/ECAPs, Disparities in Opportunity, Disproportionate Housing Needs, Publicly Supported Housing*)

The term “private investment” refers here to investment by non-governmental entities, such as corporations, financial institutions, individuals, philanthropies, and non-profits, in housing and community development infrastructure. Private investment can be used as a tool to advance fair housing, through innovative strategies such as mixed-use developments, targeted investment, and public-private partnerships. Private investments may include, but are not limited to: housing construction or rehabilitation; investment in businesses; the creation of community amenities, such as recreational facilities and providing social services; and economic development of the neighborhoods that creates jobs and increase access to amenities such as grocery stores, pharmacies, and banks. It should be noted that investment solely in housing construction or rehabilitation in areas that lack other types of investment may perpetuate fair housing issues. While “private investment” may include many types of investment, to achieve fair housing outcomes such investments should be strategic and part of a comprehensive community development strategy.

Lack of public investment in specific neighborhoods, including services or amenities (*Segregation, R/ECAPs, Disparities in Opportunity, Disproportionate Housing Needs, Publicly Supported Housing*)

The term “public investment” refers here to the money government spends on housing and community development, including public facilities, infrastructure, and services. Services and amenities refer to services and amenities provided by local or state governments. These services often include sanitation, water, streets, schools, emergency services, social services, parks and transportation. Lack of or disparities in the provision of municipal and state services and amenities have an impact on housing choice and the quality of communities. Inequalities can include, but are not limited to disparity in physical infrastructure (such as whether or not roads are paved or sidewalks are provided and kept up); differences in access to water or sewer lines, trash pickup, or snow plowing. Amenities can include, but are not limited to recreational facilities, libraries, and parks. Variance in the comparative quality and array of municipal and state services across neighborhoods impacts fair housing choice.

Lack of resources for fair housing agencies and organizations (*Fair Housing Enforcement, Outreach Capacity, and Resources Analysis*)

A lack of resources refers to insufficient resources for public or private organizations to conduct fair housing activities including testing, enforcement, coordination, advocacy, and awareness-raising. Fair housing testing has been particularly effective in advancing fair housing, but is rarely used today because of costs. Testing refers to the use of individuals who, without any bona fide intent to rent or purchase a home, apartment, or other dwelling, pose as prospective buyers or renters of real estate for the purpose of gathering information, which may indicate whether a housing provider is complying with fair housing laws. “Resources” as used in this factor can be either public or private funding or other resources. Consider also coordination mechanisms between different enforcement actors.

Lack of state or local fair housing laws (*Fair Housing Enforcement, Outreach Capacity, and Resources Analysis*)

State and local fair housing laws are important to fair housing outcomes. Consider laws that are comparable or “substantially equivalent” to the Fair Housing Act or other relevant federal laws affecting fair housing laws, as well as those that include additional protections. Examples of state and local laws affecting fair housing include legislation banning source of income discrimination, protections for individuals based on sexual orientation, age, survivors of domestic violence, or other characteristics, mandates to construct affordable housing, and site selection policies. Though some states and local jurisdiction may have housing laws that are designed to protect survivors of domestic violence, many do not, which impedes their ability to access and maintain their current housing as well as quickly find safe alternative housing. Also consider changes to existing State or local fair housing laws, including the proposed repeal or dilution of such legislation.

Land use and zoning laws (*Segregation, R/ECAPs, Disparities in Opportunity, Disproportionate Housing Needs, Publicly Supported Housing, Disability and Access*)

The term “land use and zoning laws” generally refers to regulation by State or local government of the use of land and buildings, including regulation of the types of activities that may be conducted, the density at which those activities may be performed, and the size, shape and location of buildings and other structures or amenities. Zoning and land use laws affect housing choice by determining where housing is built, what type of housing is built, who can live in that housing, and the cost and accessibility of the

housing. Participants should consider the following examples of such laws and policies, and any other public policies that limit or promote the production of affordable housing:

- Limits on multi-unit developments, which may include outright bans on multi-unit developments or indirect limits such as height limits, limits on project scale and density, and minimum parking requirements.
- Local nuisance ordinances designed to address the number of emergency services calls resulting from, for example, assault, harassment, stalking, disorderly conduct, and many other kinds of behavior, situations, or conditions that result in the need for emergency services, that result in loss of housing or limit fair housing choice for victims of crime or persons with disabilities.
- Minimum lot sizes, which require residences to be located on a certain minimum sized area of land.
- Occupancy restrictions, which regulate how many persons may occupy a property and, sometimes, the relationship between those persons (refer also to occupancy codes and restrictions for further information).
- Lack of inclusionary zoning practices that mandate or incentivize the creation of affordable units.
- Lack of support for development and preservation of affordable housing (may include efforts for neighborhood stabilization, green building, transit oriented development, and smart growth development)
- Requirements for special use permits for all multifamily properties or multifamily properties serving individuals with disabilities, including group and nursing homes.
- Growth management ordinances.
- Provision of local financial resources, assistance with site selection, fee reductions or waivers for affordable housing, reduction of administrative delays.
- Restrictions on manufactured housing.
- Restriction or allowance of provision of services to persons experiencing homelessness, such as limiting transitional shelters, day shelters, soup kitchens, the provision of other services, or limitations on homeless persons' access areas that are open to the public (e.g., anti-loitering or nuisance ordinances).
- Restrictions on halfway houses, transitional housing, or other housing or programs for people leaving jails and prisons and reentering society.
- Restrictions on group homes and foster care homes.

Lending Discrimination (*Segregation, R/ECAPs, Disparities in Opportunity, Disproportionate Housing Needs, Disability and Access*)

The term “lending discrimination” refers here to unequal treatment based on protected class in the receipt of financial services and in residential real estate related transactions. These services and transactions encompass a broad range of transactions, including but not limited to: the making or purchasing of loans or other financial assistance for purchasing, constructing, improving, repairing, or maintaining a dwelling, as well as the selling, brokering, or appraising or residential real estate property. Discrimination in these transaction includes, but is not limited to: refusal to make a mortgage loan or refinance a mortgage loan; refusal to provide information regarding loans or providing unequal information; imposing different terms or conditions on a loan, such as different interest rates, points, or fees; discriminating in appraising property; refusal to purchase a loan or set different terms or conditions for purchasing a loan; discrimination in providing other financial assistance for purchasing, constructing, improving, repairing, or maintaining a dwelling or other financial assistance secured by residential real estate; and discrimination in foreclosures and the maintenance of real estate owned properties.

Location of accessible housing (*Disability and Access*)

The location of accessible housing can limit fair housing choice for individuals with disabilities. An important consideration of the location of accessible housing includes the distribution of accessible units throughout the jurisdiction and whether the accessible units are concentrated in a particular area within the jurisdiction. For purposes of this assessment, accessible housing refers to housing opportunities in which individuals with disabilities have equal opportunity to use and enjoy a dwelling. Characteristics that affect accessibility may include physical accessibility of units and public and common use areas of housing, as well as application procedures, such as first come first serve waitlists, inaccessible websites or other technology, denial of access to individuals with assistance animals, lack of familiarity of the building and safety and permitting departments with accessibility standards, or lack of information about affordable accessible housing. Federal, state, and local laws apply different accessibility requirements to housing. Generally speaking, multifamily housing built in 1991 or later must have accessibility features in units and in public and common use areas for persons with disabilities in accordance with the requirements of the Fair Housing Act. Housing built by recipients of Federal financial assistance or by, on behalf of, or through programs of public entities must have accessibility features in units and in public and common use areas, but the level of accessibility required may differ depending on when the housing was constructed or altered. Single-family housing is generally not required to be accessible by Federal law, except accessibility requirements typically apply to housing constructed or operated by a recipient of Federal financial assistance or a public entity. State and local laws differ regarding accessibility requirements. An approximation that may be useful in this assessment is that buildings built before 1992 tend not to be accessible.

Location of employers (*Disparities in Opportunity*)

The geographic relationship of job centers and large employers to housing, and the linkages between the two (including, in particular, public transportation) are important components of fair housing choice. Include consideration of the type of jobs available, variety of jobs available, job training opportunities, benefits and other key aspects that affect job access.

Location of environmental health hazards (*Disparities in Opportunity*)

The geographic relationship of environmental health hazards to housing is an important component of fair housing choice. When environmental health hazards are concentrated in particular areas, neighborhood health and safety may be compromised and patterns of segregation entrenched. Environmental issues affecting health can include access to safe and clean drinking water, soil contamination, excessive air pollution, and indoor health hazards (lead based paint, radon, mold, asbestos). Relevant factors to consider include the type and number of hazards, the degree of concentration or dispersion (including in older housing stock), and health effects such as asthma, cancer clusters, obesity, etc. Additionally, industrial siting policies and incentives for the location of housing may be relevant to this factor.

Location of proficient schools and school assignment policies (*Disparities in Opportunity*)

The geographic relationship of proficient schools to housing, and the policies that govern attendance, are important components of fair housing choice. The quality of schools is often a major factor in deciding where to live and school quality is also a key component of economic mobility. Relevant factors to consider include whether proficient schools are clustered in a portion of the jurisdiction or region, the range of housing opportunities close to proficient schools, and whether the jurisdiction has policies that enable students to attend a school of choice regardless of place of residence. Policies to consider include, but are not limited to: inter-district transfer programs, limits on how many students from other areas a particular school will accept, and enrollment lotteries that do not provide access for the majority of children.

Location and type of affordable housing (*Segregation/Integration, R/ECAPS, Disparities in Opportunity*)

Affordable housing includes, but is not limited to publicly supported housing; however, each category of publicly supported housing often serves different income-eligible populations at different levels of affordability. What is “affordable” varies by circumstance, but an often used rule of thumb is that a low- or moderate-income family can afford to rent or buy a decent-quality dwelling without spending more than 30 percent of its income. The location of housing encompasses the current location as well as past siting decisions. The location of affordable housing can limit fair housing choice, especially if the housing is located in segregated areas, R/ECAPs, or areas that lack access to opportunity. The type of housing (whether the housing primarily serves families with children, elderly persons, or persons with disabilities) can also limit housing choice, especially if certain types of affordable housing are located in segregated areas, R/ECAPs, or areas that lack access to opportunity, while other types of affordable housing are not. The provision of affordable housing is often important to individuals with protected characteristics because they are disproportionately represented among those that would benefit from low-cost housing.

Loss of Affordable Housing (*Segregation/Integration, R/ECAPS, Disparities in Access to Opportunity, Disproportionate Housing Needs, Publicly Supported Housing Location and Occupancy, Disability and Access*)

The loss of existing affordable housing can limit the housing choices and exacerbate fair housing issues affecting protected class groups. Affordable housing may be lost from the long-term stock due to deterioration, abandonment, or conversion to more expensive housing types, especially in sub-markets experiencing economic improvement. Buildings can leave the affordable inventory through owner opt outs from project-based Section 8 contracts, maturing long-term mortgages and expiration of use

agreements (e.g. LIHTC at 15 or 30 years). Loss of this housing can affect multiple fair housing issues. For example, loss of affordable housing can lead to reduced access to areas with access to opportunity; displacement of protected class residents which may result in increased levels of segregation; a decrease in availability of affordable units resulting in disproportionate housing needs; or to disinvestment in segregated neighborhoods or R/ECAP communities. Potential efforts to prevent loss of existing affordable housing can include funding and indirect subsidies for rehabilitation and recapitalization to maintain physical structures, refinancing, renewal and extension of affordable use agreements, conversion to alternative subsidy types (e.g. Rental Assistance Demonstration), transfer of assistance to newer buildings or in alternative locations (e.g. PBRA Transfer Authority), and incentives for owners to maintain affordability (e.g. property tax abatement). Similarly, such efforts can also include addressing backlogs of repairs and maintaining the infrastructure of existing affordable housing, including publicly supported housing, such as through modernization or other improvements, when such efforts are part of concerted housing preservation and community revitalization efforts designed to affirmatively further fair housing. Efforts to prevent the loss of affordable housing can be part of a balanced approach to affirmatively further fair housing consistent with the Rule and HUD Guidance.

Occupancy codes and restrictions (*Segregation, R/ECAPs, Disparities in Opportunity, Publicly Supported Housing, Disability and Access*)

The term “occupancy codes and restrictions” refers here to State and local laws, ordinances, and regulations that regulate who may occupy a property and, sometimes, the relationship between those persons. Standards for occupancy of dwellings and the implication of those standards for persons with certain protected characteristics may affect fair housing choice. Occupancy codes and restrictions include, but are not limited to:

- Occupancy codes with “persons per square foot” standards.
- Occupancy codes with “bedrooms per persons” standards.
- Restrictions on number of unrelated individuals in a definition of “family.”
- Restrictions on occupancy to one family in single family housing along with a restricted definition of “family.”
- Restrictions that directly or indirectly affect occupancy based on national origin, religion, or any other protected characteristic.
- Restrictions on where voucher holders can live.
- Restriction or allowance of provision of housing or services to persons experiencing homelessness, such as limiting transitional shelters, day shelters, soup kitchens, or other provision of services

Private Discrimination (*Segregation, R/ECAPs, Disparities in Opportunity*)

The term “private discrimination” refers here to discrimination in the private housing market that is illegal under the Fair Housing Act or related civil rights statutes. This may include, but is not limited to, discrimination by landlords, property managers, home sellers, real estate agents, lenders, homeowners’

associations, and condominium boards. Some examples of private discrimination may include: Refusal of housing providers to rent to individuals because of a protected characteristic.

- Refusal of housing providers to rent to individuals because of a protected characteristic.
- The provision of disparate terms, conditions, or information related to the sale or rental of a dwelling to individuals with protected characteristics.
- Steering of individuals with protected characteristics by a real estate agent to a particular neighborhood or area at the exclusion of other areas.
- Failure to grant a reasonable accommodation or modification to persons with disabilities.
- Prohibitions, restrictions, or limitations on the presence or activities of children within or around a dwelling.
- Refusal to rent or termination of leases based on the application of a policy relating to criminal records (including arrest and conviction) or credit policies that limit access to housing or fair housing choice for members of protected class groups in a manner inconsistent with fair housing or civil rights laws.
- Harassment in the form of quid pro quo harassment or hostile environment by a landlord, an owner, a property manager, other tenants, among others resulting in the loss of housing, limited access to housing or fair housing choice for members of protected class groups.

Useful references for the extent of private discrimination may be number and nature of complaints filed against housing providers in the jurisdiction, testing evidence, and unresolved violations of fair housing and civil rights laws.

Quality of affordable housing information programs (*Publicly Supported Housing*)

The term “affordable housing information programs” refers here to the provision of information related to affordable housing to potential tenants and organizations that serve potential tenants, including the maintenance, updating, and distribution of the information. This information includes: but is not limited to, listings of affordable housing opportunities or local landlords who accept Housing Choice Vouchers; mobility counseling programs; and community outreach to potential beneficiaries. The quality of such information relates to, but is not limited to:

- How comprehensive the information is (e.g. that the information provided includes a variety of neighborhoods, including those with access to opportunity indicators)
- How up-to-date the information is (e.g. that the publicly supported housing entity is taking active steps to maintain, update and improve the information).
- Pro-active outreach to widen the pool of participating rental housing providers, including both owners of individual residences and larger rental management companies.

Regulatory barriers to providing housing and supportive services for persons with disabilities
(Disability and Access)

Some local governments require special use permits for or place other restrictions on housing and supportive services for persons with disabilities, as opposed to allowing these uses as of right. These requirements sometimes apply to all groups of unrelated individuals living together or to some subset of unrelated individuals. Such restrictions may include, but are not limited to, dispersion requirements or limits on the number of individuals residing together. Because special use permits require specific approval by local bodies, they can enable community opposition to housing for persons with disabilities and lead to difficulty constructing this type of units in areas of opportunity or anywhere at all. Other restrictions that limit fair housing choice include requirements that life-safety features appropriate for large institutional settings be installed in housing where supportive services are provided to one or more individuals with disabilities. Note that the Fair Housing Act makes it unlawful to utilize land use policies or actions that treat groups of persons with disabilities less favorably than groups of persons without disabilities, to take action against, or deny a permit, for a home because of the disability of individuals who live or would live there, or to refuse to make reasonable accommodations in land use and zoning policies and procedures where such accommodations may be necessary to afford persons or groups of persons with disabilities an equal opportunity to use and enjoy housing.

Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs *(Publicly Supported Housing)*

The term “siting selection” refers here to the placement of new publicly supported housing developments. Placement of new housing refers to new construction or acquisition with rehabilitation of previously unsubsidized housing. State and local policies, practices, and decisions can significantly affect the location of new publicly supported housing. Local policies, practices, and decisions that may influence where developments are sited include, but are not limited to, local funding approval processes, zoning and land use laws, local approval of LIHTC applications, and donations of land and other municipal contributions. For example, for LIHTC developments, the priorities and requirements set out in the governing Qualified Allocation Plan (QAP) influence where developments are located through significant provisions in QAPs such as local veto or support requirements and criteria and points awarded for project location.

Source of income discrimination *(Segregation/Integration, R/ECAPs, Disparities in Opportunity, Disproportionate Housing Needs, Publicly Supported Housing, Disability and Access)*

The term “source of income discrimination” refers here to the refusal by a housing provider to accept tenants based on type of income. This type of discrimination often occurs against individuals receiving assistance payments such as Supplemental Security Income (SSI) or other disability income (such as SSDI), social security or other retirement income, or tenant-based rental assistance, including Housing Choice Vouchers. Source of income discrimination may significantly limit fair housing choice for individuals with certain protected characteristics. The elimination of source of income discrimination and the acceptance of payment for housing, regardless of source or type of income, or housing subsidy, increases fair housing choice and access to opportunity. Additionally, some jurisdictions have laws that protect against source of income discrimination and the acceptance of payment for housing regardless of the source or type of income. Having such legislation and enforcement of such legislation may increase fair housing choice and access to opportunity. Other efforts to increase fair housing choice could include

outreach and actions to increase participation in the Housing Choice Voucher program. Examples of these outreach and actions may include, demonstrating effective business or administrative processes, such as expediting inspections or the use of innovative practices such as repair funds or security deposit assistance.

Some service areas require additional inspections, licenses, permits, paperwork, etc. for landlords hoping to rent to voucher holders. Some service areas also maintain stricter regulations on Section 8 landlords than market rate landlords or place restrictions on the number of vouchers that can be used in a given area.

State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing and other integrated settings (*Disability and Access*)

State and local laws, policies, or practices may discourage or prohibit individuals with disabilities from living in apartments, family homes, supportive housing and other integrated settings. Such laws, policies, or practices may include medical assistance or social service programs that require individuals to reside in institutional or other segregated settings in order to receive services, a lack of supportive services or affordable, accessible housing, or a lack of access to transportation, education, or jobs that would enable persons with disabilities to live in integrated, community-based settings.

Unresolved violations of fair housing or civil rights law (*Fair Housing Enforcement, Outreach Capacity, and Resources Analysis*)

Unresolved violations of fair housing and civil rights laws include determinations or adjudications of a violation or relevant laws that have not been settled or remedied. This includes determinations of housing discrimination by an agency, court, or Administrative Law Judge; findings of noncompliance by HUD or state or local agencies; and noncompliance with fair housing settlement agreements.

APPENDIX D – Glossary of Affirmatively Furthering Fair Housing (AFFH) Terms

Affirmatively Furthering Fair Housing means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a program participant’s activities and programs relating to housing and urban development. (24 C.F.R. § 5.152)

Assessment of Fair Housing (assessment or AFH) means the analysis undertaken pursuant to § 5.154 that includes an analysis of fair housing data, an assessment of fair housing issues and contributing factors, and an identification of fair housing priorities and goals, and is conducted and submitted to HUD using the Assessment Tool. The AFH may be conducted and submitted by an individual program participant (individual AFH), or may be a single AFH conducted and submitted by two or more program participants (joint AFH) or two or more program participants, where at least two of which are consolidated plan program participants (regional AFH). (24 C.F.R. § 5.152)

Assessment Tool refers collectively to any forms or templates and the accompanying instructions provided by HUD that program participants must use to conduct and submit an AFH pursuant to § 5.154. HUD may provide different Assessment Tools for different types of program participants. In accordance with the Paperwork Reduction Act (44 U.S.C. Chapter 35) (PRA), the Assessment Tool will be subject to periodic notice and opportunity to comment in order to maintain the approval of the Assessment Tool as granted by the Office of Management and Budget (OMB) under the PRA. (24 C.F.R. § 5.152)

Community Participation as required in § 5.158, means a solicitation of views and recommendations from members of the community and other interested parties, a consideration of the views and recommendations received, and a process for incorporating such views and recommendations into decisions and outcomes. For HUD regulations implementing the Housing and Community Development Act of 1974, the statutory term for “community participation” is “citizen participation,” and, therefore, the regulations in 24 CFR parts 91, 92, 570, 574, and 576 use this term. (24 C.F.R. § 5.152)

Consolidated Plan The document that is submitted to HUD that serves as the comprehensive housing affordability strategy, community development plan, and submissions for funding under any of the Community Planning and Development formula grant programs (e.g., CDBG, ESG, HOME, and HOPWA), that is prepared in accordance with the process described in this part. (24 C.F.R. § 91.5)

Consolidated Plan Program Participant means any entity specified in § 5.154(b)(1). (24 C.F.R. § 5.152). Those entities are Jurisdictions and Insular Areas that are required to submit consolidated plans for the following programs:

- The Community Development Block Grant (CDBG) program (see 24 C.F.R. part 570, parts D and I);
- The Emergency Solutions Grants (ESG) program (see 24 C.F.R. part 576);
- The HOME Investment Partnerships (HOME) program (see 24 C.F.R. part 92);
- The Housing Opportunities for Persons with AIDS (HOPWA) program (see 24 C.F.R. part 574).

Consortium An organization of geographically contiguous units of general local government that are acting as a single unit of general local government for purposes of the HOME program (see 24 CFR part 92). (24 C.F.R. § 91.5)

Contributing Factor or Fair Housing Contributing Factor means a factor that creates, contributes to, perpetuates, or increases the severity of one or more fair housing issues. Goals in an AFH are designed to overcome one or more contributing factors and related fair housing issues, as provided in § 5.154. (24 C.F.R. § 5.152)

Data refers collectively to the sources of data provided in paragraphs (1) and (2) of this definition. When identification of the specific source of data in paragraph (1) or (2) is necessary, the specific source (HUD-provided data or local data) will be stated.

- 1. HUD-Provided Data.** As more fully addressed in the Assessment Tool, the term “HUD-provided data” refers to HUD-provided metrics, statistics, and other quantified information required to be used with the Assessment Tool. HUD-provided data will not only be provided to program participants but will be posted on HUD’s Website for availability to all of the public;
- 2. Local Data.** As more fully addressed in the Assessment Tool, the term “local data” refers to metrics, statistics, and other quantified information, subject to a determination of statistical validity by HUD, relevant to the program participant’s geographic areas of

analysis, that can be found through a reasonable amount of search, are readily available at little or no cost, and are necessary for the completion of the AFH using the Assessment Tool. (24 C.F.R. § 5.152)

Disability (1) The term “disability” means, with respect to an individual:

1. A physical or mental impairment that substantially limits one or more major life activities of such individual;
2. A record of such an impairment; or
3. Being regarded as having such an impairment.

(2) The term “disability” as used herein shall be interpreted consistent with the definition of such term under section 504 of the Rehabilitation Act of 1973, as amended by the ADA Amendments Act of 2008. This definition does not change the definition of “disability” or “disabled person” adopted pursuant to a HUD program statute for purposes of determining an individual’s eligibility to participate in a housing program that serves a specified population. (24 C.F.R. § 5.152)

Disproportionate Housing Needs refers to a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing need when compared to the proportion of members of any other relevant groups or the total population experiencing that category of housing need in the applicable geographic area. For purposes of this definition, categories of housing need are based on such factors as cost burden, severe cost burden, overcrowding, and substandard housing conditions, as those terms are applied in the Assessment Tool. (24 C.F.R. § 5.152)

Fair Housing Choice means that individuals and families have the information, opportunity, and options to live where they choose without unlawful discrimination and other barriers related to race, color, religion, sex, familial status, national origin, or disability. Fair housing choice encompasses:

1. Actual choice, which means the existence of realistic housing options;
2. Protected choice, which means housing that can be accessed without discrimination; and
3. Enabled choice, which means realistic access to sufficient information regarding options so that any choice is informed. For persons with disabilities, fair housing choice and access to opportunity include access to accessible housing and housing in the most integrated setting appropriate to an individual’s needs as required under Federal civil rights law, including disability-related services that an individual needs to live in such housing.

(24 C.F.R. § 5.152)

Fair Housing Contributing Factor (see Contributing Factor)

Fair Housing Issue means a condition in a program participant’s geographic area of analysis that restricts fair housing choice or access to opportunity, and includes such conditions as ongoing local or regional segregation or lack of integration, racially or ethnically concentrated areas of poverty, significant disparities in access to opportunity, disproportionate housing needs, and evidence of discrimination or violations of civil rights law or regulations related to housing. Participation in “housing programs serving specified populations,” as defined in this section, does not present a fair housing issue of segregation, provided that such programs are administered by program participants so that the programs comply with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d–2000d–4) (Nondiscrimination in Federally Assisted Programs); the Fair Housing Act (42 U.S.C. 3601–19), including the duty to affirmatively further fair housing; section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794); the Americans with Disabilities Act (42 U.S.C. 12101, et seq.); and other Federal civil rights statutes and regulations. (24 C.F.R. § 5.152)

Fair Housing Enforcement and Fair Housing Outreach Capacity means the ability of a jurisdiction, and organizations located in the jurisdiction, to accept complaints of violations of fair housing laws, investigate such complaints, obtain remedies, engage in fair housing testing, and educate community members about fair housing laws and rights. This definition covers any State or local agency that enforces a law substantially equivalent to the Fair Housing Act (see 24 CFR part 115) and any organization participating in the Fair Housing Initiative Programs (see 24 CFR part 125). (24 C.F.R. § 5.152)

Familial Status means one or more individuals (who have not attained the age of 18 years) being domiciled with--

- (1) a parent or another person having legal custody of such individual or individuals; or
- (2) the designee of such parent or other person having such custody, with the written permission of such parent or other person.

The protections afforded against discrimination on the basis of familial status shall apply to any person who is pregnant or is in the process of securing legal custody of any individual who has not attained the age of 18 years. (42 U.S.C. 3602(k))

Geographic Area means a jurisdiction, region, State, Core-Based Statistical Area (CBSA), or another applicable area (e.g., census tract, neighborhood, Zip code, block group, housing

development, or portion thereof) relevant to the analysis required to complete the assessment of fair housing, as specified in the Assessment Tool. (24 C.F.R. § 5.152)

HUD-provided data refer to the definition of “data”.

Housing Programs Serving Specified Populations Housing programs serving specified populations are HUD and Federal housing programs, including designations in the programs, as applicable, such as HUD’s Supportive Housing for the Elderly, Supportive Housing for Persons with Disabilities, homeless assistance programs under the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11301 et seq.), and housing designated under section 7 of the United States Housing Act of 1937 (42 U.S.C. 1437e), that:

1. Serve specific identified populations; and
2. Comply with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d– 2000d–4) (Nondiscrimination in Federally Assisted Programs); the Fair Housing Act (42 U.S.C. 3601–19), including the duty to affirmatively further fair housing; section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794); the Americans with Disabilities Act (42 U.S.C. 12101, et seq.); and other Federal civil rights statutes and regulations. (24 C.F.R. § 5.152)

Housing Type is a term clarified in the Assessment Tool’s publicly supported housing section. HUD requires analysis for the following housing program types:

1. Housing that primarily serves families with children;
2. Housing for the elderly; and
3. Housing for persons with disabilities.

Insular Area has the same meaning as provided in § 570.405. (24 C.F.R. § 5.152) Eligible applicants are Guam, the Virgin Islands, American Samoa, the Trust Territory of the Pacific Islands, and the Commonwealth of the Northern Mariana Islands. (24 C.F.R. § 570.405)

Integration means a condition, within the program participant’s geographic area of analysis, as guided by the Assessment Tool, in which there is not a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability when compared to a broader geographic area. For individuals with disabilities, integration also means that such individuals are able to access housing and services in the most integrated setting appropriate to the individual’s needs. The most integrated setting is one that enables individuals with disabilities to interact with persons without disabilities to the fullest extent possible, consistent with the requirements of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.) and section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794). See 28 CFR part 35, appendix B (addressing 28 CFR 35.130 and providing guidance on the

American with Disabilities Act regulation on nondiscrimination on the basis of disability in State and local government services). (24 C.F.R. § 5.152)

Joint Participants refers to two or more program participants conducting and submitting a single AFH (a joint AFH), in accordance with § 5.156 and 24 CFR 903.15(a)(1) and (2), as applicable. (24 C.F.R. § 5.152)

Jurisdiction A State or unit of general local government. (24 C.F.R. § 91.5)

Local Data refer to the definition of “data”.

Local Knowledge as more fully addressed in the Assessment Tool, local knowledge means information to be provided by the program participant that relates to the participant’s geographic areas of analysis and that is relevant to the program participant’s AFH, is known or becomes known to the program participant, and is necessary for the completion of the AFH using the Assessment Tool. (24 C.F.R. § 5.152)

Meaningful Actions means significant actions that are designed and can be reasonably expected to achieve a material positive change that affirmatively furthers fair housing by, for example, increasing fair housing choice or decreasing disparities in access to opportunity. (24 C.F.R. § 5.15.2)

Program Category is a term clarified in the Assessment Tool’s publicly supported housing section. HUD is providing data and requires analysis for the following five housing program categories. The program categories are:

1. Public Housing
2. Project-Based Section 8
3. Other HUD multifamily housing (includes both Section 202—Supportive Housing for the Elderly and Section 811—Supportive Housing for Persons with Disabilities)
4. Low Income Housing Tax Credit (LIHTC) housing
5. Housing Choice Vouchers (HCV)
6. Other publicly supported housing program categories may be relevant to the analysis, but are not included in the program categories for which HUD-provides data and requires analysis.

Program Participants means any entities specified in § 5.154(b). (24 C.F.R. § 5.152).

Jurisdictions and Insular Areas that are required to submit consolidated plans for the following programs:

- The Community Development Block Grant (CDBG) program (see 24 C.F.R. part 570, parts D and I);
- The Emergency Solutions Grants (ESG) program (see 24 C.F.R. part 576);
- The HOME Investment Partnerships (HOME) program (see 24 C.F.R. part 92);
- The Housing Opportunities for Persons with AIDS (HOPWA) program (see 24 C.F.R. part 574).
- Public housing agencies (PHAs) receiving assistance under sections 8 or 9 of the United States Housing Act of 1937 (42 U.S.C. 1437f or 42 U.S.C. 1437g). (24 C.F.R. § 5.154(b))

Protected Characteristics are race, color, religion, sex, familial status, national origin, having a disability, and having a type of disability. (24 C.F.R. § 5.152)

Protected Class means a group of persons who have the same protected characteristic; e.g., a group of persons who are of the same race are a protected class. Similarly, a person who has a mobility disability is a member of the protected class of persons with disabilities and a member of the protected class of persons with mobility disabilities. (24 C.F.R. § 5.152)

Qualified Public Housing Agency (Qualified PHA) Refers to a PHA:

(1) For which the sum of:

The number of public housing dwelling units administered by the PHA; and

The number of vouchers under section 8(o) of the United States Housing Act of 1937 (42 U.S.C. 1437f(o)) administered by the PHA is 550 or fewer; and

(2) That is not designated under section 6(j)(2) of the United States Housing Act of 1937 as a troubled PHA, and does not have a failing score under the Section 8 Management Assessment Program (SEMAP) during the prior 12 months. (24 C.F.R. § 5.152)

Racially or Ethnically Concentrated Area of Poverty means a geographic area with significant concentrations of poverty and minority populations. (24 C.F.R. § 5.152)

Regionally Collaborating Program Participants refers to joint participants, at least two of which are consolidated plan program participants. A PHA may participate in a regional assessment in accordance with PHA Plan participation requirements under 24 CFR 903.15(a)(1). Regionally collaborating participants conduct and submit a single AFH (regional AFH) in accordance with § 5.156. (24 C.F.R. § 5.152)

Segregation means a condition, within the program participant’s geographic area of analysis, as guided by the Assessment Tool, in which there is a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a type of disability in a particular geographic area when compared to a broader geographic area. For persons with disabilities, segregation includes a condition in which the housing or services are not in the most integrated setting appropriate to an individual’s needs in accordance with the requirements of the Americans with Disabilities Act (42 U.S.C. 12101, et seq.), and section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794). (See 28 CFR part 35, appendix B, addressing 25 CFR 35.130.) Participation in “housing programs serving specified populations” as defined in this section does not present a fair housing issue of segregation, provided that such programs are administered to comply with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d 2000d–4) (Nondiscrimination in Federally Assisted Programs): The Fair Housing Act (42 U.S.C. 3601–19), including the duty to affirmatively further fair housing: section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794); the Americans with Disabilities Act (42 U.S.C. 12101, et seq.); and other Federal civil rights statutes and regulations. (24 C.F.R. § 5.152)

Significant Disparities in Access to Opportunity means substantial and measurable differences in access to educational, transportation, economic, and other important opportunities in a community, based on protected class related to housing. (24 C.F.R. § 5.152)

State Any State of the United States and the Commonwealth of Puerto Rico. (24 C.F.R. § 91.5)

Unit of General Local Government A city, town, township, county, parish, village, or other general purpose political subdivision of a State; an urban county; and a consortium of such political subdivisions recognized by HUD in accordance with the HOME program (24 CFR part 92) or the CDBG program (24 CFR part 570). (24 C.F.R. § 91.5)