

2018 ANALYSIS OF IMPEDIMENTS OF FAIR HOUSING CHOICE FOR THE COMMUNITY DEVELOPMENT COMMISSION AND HOUSING AUTHORITY OF THE LOS ANGELES COUNTY

EXECUTIVE SUMMARY



Prepared for:
Community Development Commission of the County of Los Angeles
700 W. Main Street
Alhambra, CA 91801

and

Housing Authority of the County of Los Angeles
700 W. Main Street
Alhambra, CA 91801

Prepared by:
Western Economic Services, LLC
212 SE 18th Avenue
Portland, OR 97214
Phone: (503) 239-9091
Toll Free: (866) 937-9437
Fax: (503) 239-0236

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SECTION I. EXECUTIVE SUMMARY

OVERVIEW

Title VIII of the 1968 Civil Rights Act, also known as the Federal Fair Housing Act, made it illegal to discriminate in the buying, selling, or renting of housing based on a person's race, color, religion, or national origin. Sex was added as a protected class in the 1970s. In 1988, the Fair Housing Amendments Act added familial status and disability to the list, making a total of seven federally protected characteristics. Federal fair housing statutes are largely covered by the following three pieces of U.S. legislation:

1. The Fair Housing Act,
2. The Housing Amendments Act, and
3. The Americans with Disabilities Act.

The purpose of fair housing law is to protect a person's right to own, sell, purchase, or rent housing of his or her choice without fear of unlawful discrimination. The goal of fair housing law is to allow everyone equal opportunity to access housing. In 1959, California passed its Fair Employment and Housing Law, covering the same protected classes as noted in Federal Law. California protected classes include race, color, ancestry/national origin, religion, disability, sex and gender, sexual orientation, gender identity, genetic information, marital status, familial status, and source of income.

ASSESSING FAIR HOUSING

Provisions to affirmatively further fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD) housing and community development programs. These provisions come from Section 808(e) (5) of the Federal Fair Housing Act, which requires that the Secretary of HUD administer federal housing and urban development programs in a manner that affirmatively furthers fair housing.

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG)¹, and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle.

As a part of the consolidated planning process, and entitlement communities that receive such funds as a formula allocation directly from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing (AFFH). The Community Development Commission of the County of Los Angeles (CDC) and the Housing Authority of the County of Los Angeles (HACoLA) have formed a joint effort to prepare, conduct, and submit to HUD their certification for AFFH, which is presented in this Analysis of Impediments.

¹ The Emergency Shelter Grants program was renamed the Emergency Solutions Grants program in 2011.

Analysis of IMPEDIMENTS

After completing and submitting the Assessment of Fair Housing (AFH) in October, 2017, HUD released a new rule on January 5, 2018. This rule notified program participants that HUD will discontinue the review of AFHs currently under review. Starting at this date, consolidated plan program participants must continue to comply with existing, ongoing obligations to affirmatively further fair housing. Until a program participant is required to submit an AFH, it will continue to provide the AFFH Consolidated plan certification in accordance with the requirements that existed prior to August 17, 2015. The new rule is included as an attachment to this document in Volume II.

As the CDC and HACoLA had already submitted the AFH for review, but had not yet been accepted by HUD, the CDC and HACoLA are meeting AFFH rule requirements through the development of an Analysis of Impediments of Fair Housing Choice, utilizing the framework of the Assessment of Fair Housing.

Due to the fact that this Analysis of Impediments (AI) was originally developed as an Assessment of Fair Housing (AFH), this document may be referred to both an AI or AFH throughout.

AGENCY DESCRIPTIONS

The following agencies and programs factor prominently in this AI and are thus summarized briefly below.

COMMUNITY DEVELOPMENT COMMISSION

In 1982, the Los Angeles County Board of Supervisors consolidated three entities – the Housing Authority, the Community Development Department, and the Redevelopment Agency – to form the Community Development Commission (CDC). Today, the CDC is comprised of two separate legal entities, the Housing Authority of the County of Los Angeles (Housing Authority) and the CDC, both of which are part of the County family, but are independent agencies and not County Departments.

The Board of Supervisors currently serves as the Commissioners of the CDC – which includes serving as the Commissioners of the Housing Authority of the County of Los Angeles (Housing Authority) – setting policy for the agency. The Board of Commissioners receives input from the agency's Housing Commission, which meets monthly at various locations throughout the County. Comprised of Board appointees and Housing Authority tenants, it is the Housing Commission's responsibility to review and make recommendations on matters that will be presented to the Board of Commissioners for approval, including Section 8 and public housing policies and procedures.

Although the State of California dissolved all redevelopment agencies in February 2012, the CDC continues to serve in the County of Los Angeles as an affordable housing, and community and economic development agency. The CDC's wide-ranging programs benefit residents and business owners in the unincorporated Los Angeles County areas and in various incorporated cities that participate in different CDC programs (these cities are called "participating cities").

Approximately one million of the County's more than ten million residents live in unincorporated areas.

Over 70% of the CDC's funding comes from the U.S. Department of Housing and Urban Development (HUD). The agency's four main activity areas are subsidized housing, housing development and preservation, community development, and economic development. In Fiscal Year 2017-2018, the agency has a budget of \$457 million and a total staff size of 580.

URBAN COUNTY PROGRAM DESCRIPTION

The CDC is the lead agency for the Consolidated Plan. It administers the County's CDBG, and HOME programs and the Los Angeles Homeless Services Authority (LAHSA) administers the ESG program for the CDC. The CDC comprises numerous divisions, each with its own area of responsibility. Those divisions most directly involved with implementation of the Urban County's housing and community development strategy include Community Development, Economic and Housing Development, Assisted Housing, and Housing Management.

As the largest city in the Los Angeles eligible metropolitan statistical area (EMSA), the City of Los Angeles manages the Housing Opportunities for Persons with AIDS (HOPWA) Program. The CDC aids with managing the program by taking part in the Los Angeles Countywide HOPWA Advisory Committee. This committee advises the City on identification of the needs and priorities of people with HIV/AIDS.

PUBLIC HOUSING PROGRAM AND SECTION 8

The Housing Authority of the County of Los Angeles (Housing Authority) serves in Los Angeles County, administering both the Section 8 Housing Choice Voucher and Public Housing programs. The Section 8 Housing Choice Voucher program currently assists approximately 23,000 families through a partnership with over 13,000 property owners. The Public Housing program manages 3,229 units of public and other affordable housing throughout Los Angeles County.

PUBLIC HOUSING PROGRAM

Public Housing refers to specific developments owned or operated by the Housing Authority which leases units directly to families.

SECTION 8 PROGRAM

The Section 8 program offers tenant-based assistance. Participants find their own housing to rent and pay a portion of their income towards rent.

SERVICE AREAS

The geographic area covered by this AI comprises that area served by the Community Development Commission of the County of Los Angeles (CDC) Community Development Block Grant Program (CDBG) as well as that area served by the Housing Authority of the County of Los Angeles (HACoLA). This is termed the "Service Area" in this AI. Further, these two entities are provided funds from the US Department of Housing and Urban Development. Even taken together, these entities do not serve the entire County and other development activities undertaken by the CDC but not funded through federal sources of funds, which may

be distributed county-wide, are part of the strategy taken in addressing fair housing goals identified in the AI.

To explain this definition of service area further, the CDC has an Urban County designation for its CDBG program. This designation represents 47 smaller cities in the County, as noted below in Table I.1

Table I.1
Participating Cities in the Los Angeles Urban County

Aqoura Hills	Commerce	La Cañada Flintridge	Monrovia	South El Monte
Arcadia	Covina	La Habra Heights	Rancho Palos Verdes	South Pasadena
Avalon	Cudahy	La Mirada	Rolling Hills Estates	Temple City
Azusa	Culver City	La Puente	San Dimas	Torrance
Bell	Diamond Bar	La Verne	San Fernando	Walnut
Bell Gardens	Duarte	Lawndale	San Gabriel	West Hollywood
Beverly Hills	El Segundo	Lomita	San Marino	Westlake Village
Calabasas	Hawaiian Gardens	Malibu	Santa Fe Springs	
Cerritos	Hermosa Beach	Manhattan Beach	Sierra Madre	
Claremont	Irwindale	Maywood	Signal Hill	

In addition, the Urban County also has a number of Census Designated Places (CDP), or unincorporated communities in the County, as noted in Table I.2, on the following page, along with other Non-CDP areas that are unincorporated. In total, this represents only about 20 percent of the County's population.

Map I.1, on page , shows the participating cities, unincorporated Census Designated Places, and other unincorporated areas in the Urban County service area. This map also includes the Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs) that are in the Urban County.

Table I.3 shows R/ECAPs for the Urban County and Table I.4 A, following directly after, presents the fair housing goals, issues, and proposed achievements for the Urban County.

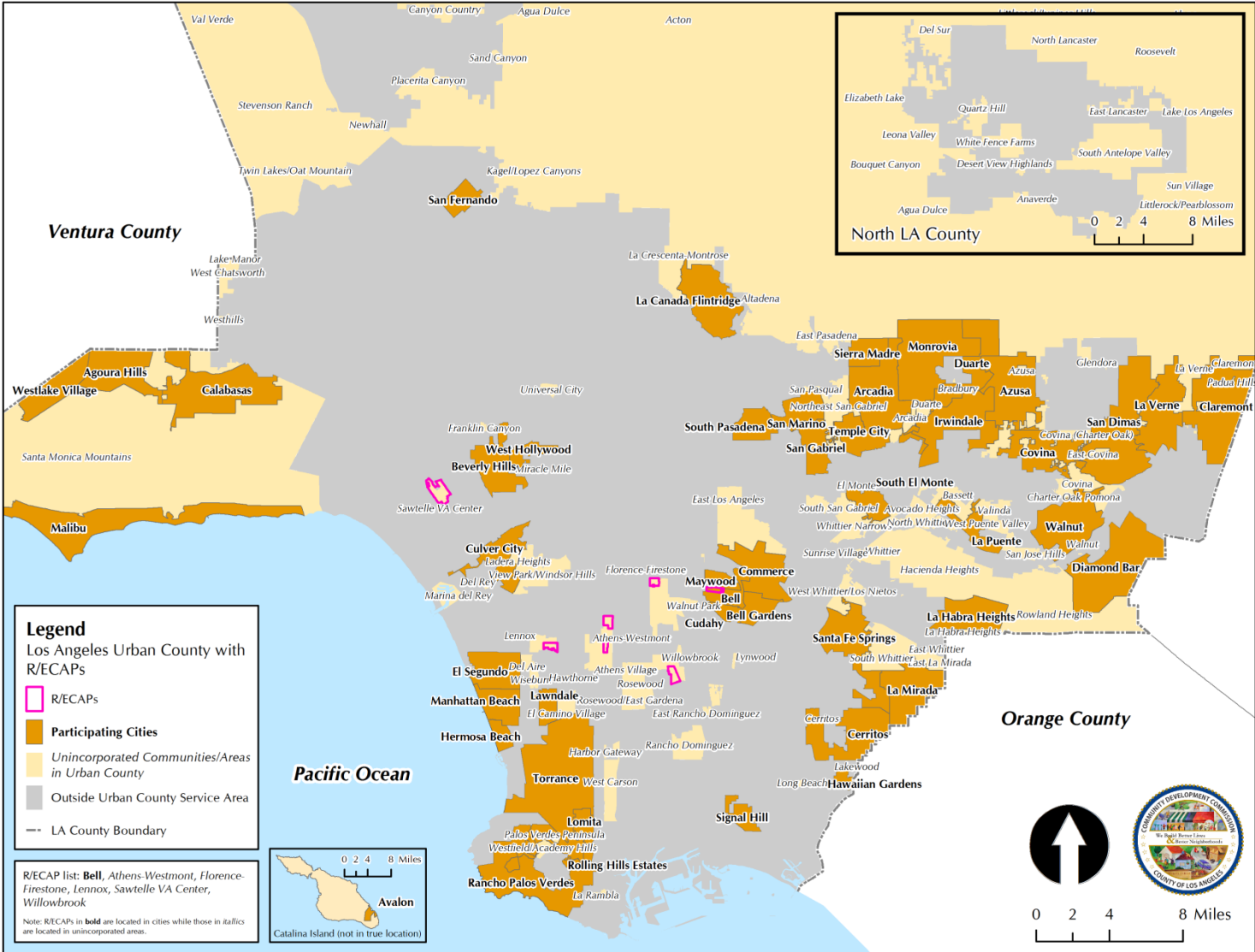
Table I.2
Urban County Census Tracts Designated as Racial or Ethnically Concentrated Areas of Poverty (R/ECAPs)

Community Name	Census Tract Number
Athens-Westmont	06037600100
	06037600303
Bell	06037533601
Florence/Firestone	06037532800
Lennox	06037601700
Sawtelle VA Center	06037701100
Willowbrook	06037541400

Table I.3
Unincorporated Communities in the Los Angeles Urban County

Acton	Del Aire	La Habra Heights	North Whittier	South Edwards
Agoura	Del Rey	La Rambla	Northeast San Gabriel	South El Monte
Agua Dulce	Del Sure	La Verne	Padua Hills	South San Gabriel
Altadena	Desert View Highlands	Ladera Heights	Palmdale	South Whittier
Anaverde	Duarte	Lake Hughes	Palos Verdes Peninsula	Stevenson Ranch (Santa Clarita)
Angeles National Forest	East Covina	Lake Los Angeles	Pearblossom/Llano	Sulpher Springs
Antelope Acres	East La Mirada	Lake Manor	Pellissier Village	Sun Village
Arcadia	East Lancaster	Lakewood	Pinetree	Sunrise Village
Athens Village	East Los Angeles	Lang	Placerita Canyon	Topanga
Athens-Westmont	East Pasadena	Lawndale	Pomona	Torrance
Avocado Heights	East Rancho Dominguez	Lennox	Quartz Hill	Twin Lakes/Oat Mountain
Azusa	East Whittier	Leona Valley	Rancho Dominguez	Universal City
Baldwin Hills	El Camino Village	Littlerock	Rolling Hills	Val Verde
Bandini Islands	El Monte	Littlerock/Juniper Hills	Roosevelt	Valencia (Santa Clarita)
Bassett	El Nido	Littlerock/Pearblossom	Rosewood	Valinda
Bouquet Canyon	El Porto	Llano	Rosewood/East Gardena	Valyermo
Bradbury	Elizabeth Lake	Long Beach	Rosewood/West Rancho Dominguez	Vasquez Rocks
Calabasas Highlands	Fernwood	Los Angeles	Rowland Heights	View Park/Windsor Hills
Calabasas Park	Florence-Firestone	Lynwood	San Clemente Island	Walnut
Canyon Country (Santa Clarita)	Forest Park	Malibu Bowl (Malibu)	San Francisquito Canyon/Bouquet Canyon	Walnut Park
Carson	Franklin Canyon	Malibu Lake	San Jose Hills	West Antelope Valley
Castaic	Glendora	Marina del Rey	San Pasqual	West Carson
Cerritos	Glenview	Mint Canyon	Sand Canyon	West Chatsworth
Charter Oak	Green Valley	Miracle Mile	Santa Catalina Island	West Puente Valley
City Terrace	Hacienda Heights	Miraleste	Santa Monica Mountains	West Rancho Dominguez
Claremont	Harbor Gateway	Monrovia	Saugus (Santa Clarita)	Willowbrook
Compton	Hawthorne	Monte Nido	Saugus/Canyon Country	Wilsona Gardens
Cornell	Hi Vista	Montrose	Sawtelle VA Center	Wiseburn
Covina	Kagel/Lopez Canyons	Newhall (Santa Clarita)	Soledad	
Covina (Charter Oak)	La Crescenta-Montrose	North Lancaster	South Antelope Valley	

**Map I.1
Urban County Service Area**



Data Sources: HUD AFFH, County of Los Angeles, USGS, Census Tigerline, Esri

Impediments to Fair Housing Choice/Contributing Factors and Goals

The Table below provides a list of impediments that have been identified as contributing to fair housing issues pertaining specifically to the Urban County and HACoLA's service areas. These items are prioritized according to the following criteria:

1. High: Impediments/Contributing factors that have a direct and substantial impact on fair housing choice, especially in R/ECAP areas, affecting housing, those impacting persons with disabilities, and are core functions of HACoLA or the CDC.
2. Moderate: Impediments/Contributing factors that have a direct and substantial impact on fair housing choice, especially in R/ECAP areas, affecting housing, those impacting persons with disabilities, and are core functions of HACoLA or the CDC, but the CDC or HACoLA may only have limited capacity to make a significant impact; or may not be within the core functions of HACoLA or the CDC.
3. Low: Impediments/Contributing factors that may have a direct and substantial impact on fair housing choice but are not within the core functions of HACoLA or the CDC or not within the capacity of these organizations to make significant impact, or not specific to R/ECAP neighborhoods, or have a slight or largely indirect impact on fair housing choice.

The impediments/contributing factors identified and included in the following table are in relation to the fair housing issues listed below. The prioritization of these contributing factors relates to the ability of the CDC and HACoLA to address the fair housing issues. A low priority does not diminish the importance of the factor in the Urban County or HACoLA service areas, but reflects the priority in addressing issues of fair housing.

- Segregation
- Racially or ethnically concentrated areas of poverty (R/ECAPs)
- Disparities in Access to Opportunity
- Disproportionate Housing Needs
- Discrimination or violations of civil rights laws or regulations related to housing

Impediments/Contributing Factor	Priority	Justification	Service Area
Barriers to mobility	High	<p>According to 2015 ACS data, an estimated 9.2 percent of persons in the Urban County had a disability. The ability for persons with disabilities to access infrastructure, public facilities, and housing units is limited by barriers to mobility, such as physical accommodations for access. Some 37.6 percent of survey respondents with a disability indicated that it was difficult or somewhat difficult getting about their neighborhood or housing complex. In addition, an estimated 10.5 percent of respondents in Los Angeles County indicated that there are problems with their home that create physical/accessibility issues for their households. Based on a survey of participating cities regarding their CDBG spending priorities, over 80% indicated that they will use CDBG funds if available during the next five (5) years to address accessibility improvements such as sidewalks, public facilities, or housing. Participating cities considered the needs identified through assessments and input from residents to set their CDBG spending priorities.</p> <p>Barriers to mobility limits access to opportunities, creating a disproportionate access and contributing to fair housing issues. As such, this factor has been rated as a high priority.</p> <p>While the CDC and HACoLA have made continued efforts in the past to increase access for persons with disabilities, the need remains. The CDC and HACoLA must establish goals to increase access in order to diminish any disproportionate access to opportunity that persons with disabilities in the Urban County experience.</p>	<p>Los Angeles Urban County</p> <p>HACoLA</p>
Lack of affordable housing in a range of sizes	High	<p>According to the 2017 HUD AFFH data, approximately 74 percent of family households with five or more members experience housing problems such as cost burdens or overcrowding. The high percentage of families that need appropriately sized housing makes this contributing factor a high priority.</p> <p>Almost a quarter of all households surveyed expressed severe cost burdens which impact racial and ethnic minorities at an even higher rate. The lack of affordable housing units available in a wide variety of household sizes is evident in the proportion of households with severe cost burdens.</p> <p>The 2017-18 Resident Survey found that countywide the need for housing for seniors and persons with disabilities, ranked out of a possible 4, were 3.36 and 3.28, respectively.</p> <p>Although the CDC has encouraged the development of affordable units for special needs and low income households, the need for additional housing options is striking compared to available units. As a high priority, the CDC will continue to direct efforts and resources to promoting affordable housing options that comply with federal and state fair housing requirements, including Section 504 of the Rehabilitation Act (Section 504), Title II of the Americans with Disabilities Act (ADA), and the Fair Housing Act.</p>	<p>Los Angeles Urban County</p>
Lack of sufficient accessible housing in a range of unit sizes	High	<p>While 2015 ACS data states that 9.2 percent of persons in the Urban County had a disability, according to the County's 2015 Health Survey, 22.6 percent had a disability countywide. Barriers to mobility are compounded with limited access to affordable housing to create a lack of accessible housing options. Service providers echo this sentiment, highlighting the need for additional accessible units for varying households. The 2017-2018 Resident Survey found that, countywide, the rated need for housing for persons with disabilities was 3.28 out of 4.</p> <p>Lack of sufficient accessible housing in a range of unit sizes is rated as a high priority due to its impact on persons with disability to access fair housing options. This factor is a core function of both the CDC and HACoLA to address fair housing issues in the County.</p> <p>HACoLA and the CDC have been increasing the number of accessible units in the County through various efforts over time. However, these efforts still do not meet the need of persons with disabilities to access housing. In establishing goals to meet this need, the CDC and HACoLA will help decrease the disparity in access to housing options and access to opportunity for persons with disabilities.</p>	<p>Los Angeles Urban County</p> <p>HACoLA</p>

Impediments/Contributing Factor	Priority	Justification	Service Area
Lack of sufficient publicly supported housing for persons with HIV/AIDS	High	<p>The HIV/AIDS population in Los Angeles County has seen 85,500 cumulative diagnosis of HIV/AIDS, according to the 2015 Annual HIV Surveillance Report, which also estimates that 60,000 persons are currently living in the County with HIV/AIDS. This report also suggests that the Hispanic population is disproportionately affected, as well as persons in San Fernando and San Gabriel Valley. The U.S. Department of Health and Human Services states that stable housing options for this population has been linked to better ability to access care and supportive services, as well as maintenance of treatment.² The continued need for housing options for persons with HIV/AIDS was emphasized during the AI process through service providers and public input.</p> <p>The lack of sufficient publicly supported housing for persons with HIV/AIDS limits access to housing options for this special needs population. This directly impacts access to opportunity and exasperates levels of segregation. Due to these impacts, this factor has been given a high priority.</p> <p>Housing efforts have been undertaken county-wide to increase housing option for person with HIV/AIDS. However, the need for additional housing options is still prominent for this special needs community. The CDC will Establish a goal to increase housing options to help diminish the dipartites in access for persons with HIV/AIDS.</p>	Los Angeles Urban County
Land use and planning decisions restrict fair housing choice for persons with disabilities and affordable housing in general	High	<p>The location of accessible and affordable housing units in the Urban County may indicate that land use and planning decisions are restricting the housing options for eligible households. Affordable housing options tend to be located in or adjacent to R/ECAP areas, as seen in the maps in Section F.</p> <p>Land use and planning decisions restricting fair housing choice for persons with disabilities and affordable housing in general plays an immediate impact on fair housing issues by limiting housing choices, diminishing access to opportunity, and further exacerbates segregations among minorities and for persons with disabilities. For these reasons, this factor has been places as a high priority.</p> <p>While the CDC and participating cities have reviewed and implemented Housing Elements and other plans, the need for additional review and revision exists in order to identify restrictions to accessible and affordable housing. Identifying and revising existing land use and planning decisions will expand housing options and increase access to fair housing options within the County.</p>	Los Angeles Urban County
Presence of lead poisoning exposure	High	<p>Lead poisoning exposure continues to be an issue for households, particularly for low income households. Between 2011 and 2015, over 15,000 children under the age of 6 test positive for lead.³ However, the number of those children that have elevated blood lead levels is unclear, and under-testing appears to be a continued problem⁴ According to the Response and Surveillance System for Childhood Lead Exposure (RASSCLE), the highest levels of lead poisoning exposure can be found in Central and South Los Angeles. Elevated blood levels are more prevalent among low income households.⁵ In addition, CDC studies have found that black populations have been found to be more likely to have elevated blood levels.⁶</p> <p>This heightened risk limits access to healthy neighborhoods and safe housing environments. It is selected as a high priority due to its impact of access to healthy housing options and increases disproportionate housing needs within R/ECAP areas.</p> <p>The CDC has funded lead abatement procedures, but the continued risk threatens the health and safety of households, especially those with children. The CDC will continue efforts to promote increased access to healthy and safe housing options through lead abatement efforts and review.</p>	Los Angeles Urban County

² <https://www.hiv.gov/hiv-basics/living-well-with-hiv/taking-care-of-yourself/housing-and-health>

³ "Lead's Hidden Toll", Joshua Schneyer, April 20, 2017. Reuters Investigates. <http://www.reuters.com/investigates/special-report/usa-lead-la/>.

⁴ <https://www.reuters.com/article/us-usa-lead-la/l-a-health-officials-misstated-some-cases-of-childhood-lead-exposure-idUSKBN18S66J>

⁵ <http://www.epi.umn.edu/let/nutri/disparities/causes.shtml>

⁶ <https://www.cdc.gov/mmwr/volumes/65/wr/mm6539a9.htm>

Impediments/Contributing Factor	Priority	Justification	Service Area
Significant disparities in the proportion of members of protected classes experiencing substandard housing when compared to the total population	High	<p>Housing problems impact a large proportion of households in LA County. Racial and ethnic minorities, people with disabilities, families with children, and other protected classes face housing problems at higher rates than the total population. For example, black and Hispanic households face housing problems at a rate of 58.7 and 66.5 percent, respectively, and families with 5 or more people face housing problems at a rate of 74.0 percent, according to HUD AFFH Data.</p> <p>The rate at which protected classes face housing problems compared to the general population exemplifies the disproportionate housing need in the County, particularly those in R/ECAPs. This is a high priority as it impacts the level of access to fair housing options for these households in the County.</p> <p>While the CDC has directed resources to address disparities in access to housing in at-need areas, continued efforts are needed in order to guarantee access to housing options. The CDC will continue to establish meaningful and impactful goals to increase access for protected classes to access housing and decrease disproportionate need.</p>	Los Angeles Urban County
Noise Pollution due to plane traffic from Los Angeles International Airport	High	<p>R/ECAPs in the Urban County are more likely to face environmental issues, such as noise pollution from LAX. There are an estimated 8,424 dwelling units impacted by noise from LAX.⁷ Noise pollution continues to be a hazard for low income households and for R/ECAPs.</p> <p>Noise pollution decreases quality of life and limits access to healthy neighborhoods. This factor has been selected as a high priority due to the enormous need and its effect on persons living in R/ECAPs as well as the ability of the CDC to work with Federal Aviation Administration and Los Angeles World Airports to address the need.</p> <p>The CDC has recognized the impact of noise pollution on household access to healthy neighborhood, and is creating goals to help diminish the impact of noise pollution on access to healthy neighborhoods.</p>	Los Angeles Urban County
Poor land use and zoning siting sources of pollution and environmental hazards near housing	High	<p>The disparity in access to healthy neighborhoods shows a marked disparity for racial and ethnic minorities in accessing healthy neighborhoods. The location of housing adjacent to environmental hazards may continue to allow for disparities to exist and limit household access to lower pollution levels. R/ECAP areas in the Urban County tend to have higher levels of toxic emissions and environmental hazards, as seen in Map IV.110.</p> <p>Poor land use and zoning policies diminish access to opportunity and healthy neighborhoods. Siting decisions increase the disproportionate level of access to unhealthy neighborhoods for racial and ethnic minorities and low-income households, particularly those in R/ECAPs. These limiting factors to fair housing options, places this factor as a high priority.</p> <p>While the CDC and participating cities have reviewed and implemented Housing Elements and other plans, the need for additional review and revision exists in order to identify restrictions to accessible and affordable housing. Identifying and revising existing land use and planning decisions will expand housing options and increase access to fair housing options within the County. In addition, the CDC will continue its policy in the Notice of Funding Availability for affordable housing that applicants that propose projects within 500 feet of a freeway will not qualify for funding such as HOME Partnerships Investment and other applicable funding. Participating cities will also be trained on the policy and encouraged to implement it within their jurisdictions</p>	Los Angeles Urban County

⁷ http://www.lawa.org/uploadedFiles/LAX/pdf/3q17_20171115_Quarterly_Report.pdf

Impediments/Contributing Factor	Priority	Justification	Service Area
Access to quality healthcare	Low	<p>Healthy Neighborhoods focus groups highlighted the poor access to quality healthcare in areas with higher concentrations of poverty. The 2015 LA County Health Survey found that 43.0 percent of persons below the Federal Poverty Line had difficulty accessing medical care. Racial and ethnic minorities also have more difficulty accessing medical care, with 31.2 percent of Hispanic and 26.8 percent of Asian adults having difficulty, compared to 12.7 percent of white adults.</p> <p>While this issue remains vital to the overall well-being of Urban County households and impacts the ability of households to access healthy neighborhoods, the CDC has limited capacity to make effective change with its available resources to provide access to quality healthcare. The Department of Public Health and other agencies throughout Los Angeles County are responsible for healthcare and the CDC partners with these agencies where possible.</p> <p>The CDC has funded community efforts to promote access to community health services. The CDC will continue these efforts by establishing goals to create more access to healthcare and healthy neighborhoods.</p>	Los Angeles Urban County
Food insecurity - Access to healthy and nutritious food options	Moderate	<p>Food insecurity continues to be an issue for many households in Los Angeles County. The 2015 County Health Survey found that 41.1 percent of households below the FPL had low or very low food security. In addition, Latino, black, and American Indian households had a markedly higher rate of low or very low food security.⁸ Many areas experience limited access to fresh food, particularly R/ECAPs in the County, as shown by USDA food atlas.⁹ This sentiment was echoed by the Healthy Neighborhoods Focus Groups.</p> <p>Limited access to food options and food insecurity are directly impactful to access to healthy neighborhoods. Since the County is seeing disproportionate access for R/ECAPs and low-income and minority populations in food security, the priority for this factor is moderate. It is rates as a moderate priority as the CDC will focus more resources on issues directly related to fair housing choice.</p> <p>Increasing access to food options will reduce the level of disparity that low-income and minority populations face in access to healthy neighborhoods. In light of this, although it's a moderate priority, HACoLA and the CDC can establish goals to help increase access to food options and social services with its limited resources.</p>	Los Angeles Urban County HACoLA
Location and access to local businesses, especially in economically depressed areas	Moderate	<p>Access to local businesses may limit job proximity and labor force engagement. As seen in the Opportunity Indices. Labor force engagement for some racial and ethnic minorities is markedly lower than for white Urban County residents. Labor market index scores for black and Hispanic households were 44.4 and 34.9, respectively, while those for white households were 69.4.</p> <p>Location and access to local businesses, especially in economically depressed areas such as R/ECAPs, limits access to opportunity. This is directly connected to fair housing issues and the CDC continues to invest in business assistance in R/ECAPs. However, it is rated as a moderate priority as the CDC will focus more resources on issues directly related to fair housing choice.</p> <p>Areas with high concentrations of racial and ethnic minorities and poverty, or R/ECAPs, are inundated with lower level of access to opportunity and access to local businesses. The CDC will implement activities to increase access to increased business activity in R/ECAPs in order to decrease disparities in access to opportunity.</p>	Los Angeles Urban County

⁸ <http://www.publichealth.lacounty.gov/ha/LACHSDDataTopics2015.htm>

⁹ <https://www.ers.usda.gov/data-products/food-access-research-atlas/go-to-the-atlas.aspx>

Impediments/Contributing Factor	Priority	Justification	Service Area
Lack of Information on Affordable Housing	High	<p>Public input brought to light the limitation of current outreach practices that do not provide sufficient reach for eligible households to access information regarding affordable housing opportunities in the Urban County.</p> <p>Limited access to information on affordable housing directly impacts access to housing options. Disparities in access to housing options relates directly to fair housing issues and is placed as a high priority.</p> <p>Efforts to increase access to information have been on-going throughout the County. Efforts by the CDC to increase knowledge about federal and state fair housing requirements will decrease disparities in access and increase the accessibility of fair housing options.</p>	Los Angeles Urban County
Increasing measures of segregation	High	<p>The Urban County has seen moderate to high levels of segregation since the 1990s. Most of these levels have remained high into 2015, with Black/White segregation and Hispanic/White segregation remaining virtually unchanged since 2000 at 67.21 and 62.72, respectively, in 2015, according to AFFH Table 3. These areas of segregation continue to limit access to high opportunity areas, as well as compounding housing problems in R/ECAPs.</p> <p>The rate of segregation is a direct limiting factor in access to fair housing opportunities. As the rate of segregation in the Urban County remain high, the priority of this contributing factor remains high as well.</p> <p>The CDC will increase access to housing in low minority and high opportunity areas through the introduction of pertinent goals, such as developing housing outside of areas of minority concentrations with low opportunities. Increasing access to low minority areas will impact the rate of segregation.</p>	Los Angeles Urban County
Discrimination in private rental and homes sales markets	High	<p>According to Fair Housing public input and HMDA data, racial and ethnic minorities, as well as other protected classes, face discrimination in private rental and homeowner markets. HMDA data shows that some racial and ethnic minorities are more likely to be denied a mortgage. In addition, HUD Fair Housing Complaint Data showed over 2,600 complaints between 2008 and 2016. The basis of these complaints was most likely to be disability, race, or familial status.</p> <p>Discrimination in the private rental and home sales market has been selected as a high priority affecting the fair housing issues of disparities in access to opportunity, discrimination, and segregation. It is selected as a high priority because it directly relates to fair housing choice and restricts a person's ability to secure housing based on protected class status or some other arbitrary reason. The CDC also has the ability to contract with a fair housing service provider to address this contributing factor.</p> <p>Although the CDC has contracted with a fair housing service provider to investigate alleged violations of fair housing law in the past, the complaints still remain each year so there needs to be enhanced, on-going enforcement as well as fair housing education. In addition, to adequately determine and address patterns of discrimination, more specific complaint data needs to be collected such as where the resident currently lives, where the alleged infraction occurred, protective class, and issue code (type of discrimination). As a high priority, the CDC will need to set goals to ensure meaningful actions are implemented so that discrimination in the private rental and homes sales market can be decreased or eliminated.</p>	Los Angeles Urban County
Access to Financial Services	Moderate	<p>The Fair Housing survey found that 9.3 percent of respondents indicated that their home loan application was denied in the past five years. According to HMDA data, between 2008 and 2015, black mortgage applicants are denied at a rate more than 7 percentage points higher than white applicants, and Hispanic applicants are denied at a rate more than 5 percentage points higher than non-Hispanic applicants.</p> <p>Access to financial services is related directly to housing options, and contributes to segregation, R/ECAPs, disparities in access to opportunities, and disproportionate housing needs. While this factor contributes to fair housing issues, it is rated as a moderate priority as the CDC is not able to address this issue on a large scale due to funding as well as the fact that state and regulatory agencies are in a better position to ensure compliance.</p> <p>Although this factor is rated as a moderate priority, the CDC will conduct outreach and education services through a fair housing service provider to help additional households access financial services in the Urban County.</p>	Los Angeles Urban County

Impediments/Contributing Factor	Priority	Justification	Service Area
<p>Lack of coordination with other Planning Processes and Programs to address contributing factors</p>	<p>Moderate</p>	<p>Throughout the planning and evaluation process, the CDC acknowledges gaps in coordination and planning processes that may limit the impact of programs and resources that are used to address fair housing. The size of the Urban County, and coordination among the numerous cities and unincorporated areas is limited by scale and resources to implement large scale planning efforts.</p> <p>Lack of coordination contributes to a number of fair housing issues including segregation, R/ECAPs, disparities in access to opportunity, and disproportionate housing needs. At the time of preparing the AI, there were initiatives that were in process that could address some of these fair housing issues such as a County tenant protection ordinance. However, the role of the CDC was not defined. The CDC will continue to participate in various meetings to define these roles and will take active steps to coordinate with the agencies taking the lead in applicable planning and programming efforts. While this factor is important to reducing these fair housing issues, the role of the CDC is undefined at this point. As such, it is rated as moderate.</p> <p>In spite of the fact that this factor is rated as moderate, the CDC will address this factor with steps to increase coordination across agencies through active participation in the planning and development of future programs and policies to address fair housing issues as well as implementation of these initiatives where appropriate..</p>	<p>Los Angeles Urban County</p>

Impediments/Contributing Factor	Priority	Justification	Service Area
Public safety concerns	High	<p>Crime data reported by LA County, as well as public sentiment, pointed to a high level of need for public safety measures. This is particularly striking in R/ECAPs. According to the 2017 Fair Housing Survey, an estimated 37 percent of residents in R/ECAPs felt unsafe in their neighborhood at night, compared to 20 percent for the Urban County overall.</p> <p>Safety is a primary concern for promoting access to healthy neighborhoods. The diminished access to safety also diminishes access to healthy neighborhoods, and therefore establishes this factor as a high priority.</p> <p>Efforts to increase public safety, particularly for those households in R/ECAPs will increase access to healthy neighborhoods and decrease public safety concerns. The CDC's and HACoLA's efforts will promote community involvement and crime prevention through annual goals.</p>	<p>Los Angeles Urban County</p> <p>HACoLA</p>
Violent and drug related crime in public housing	High	<p>Violence and crime in public housing is a real concern for residents because it impacts their quality of life, particularly those in R/ECAPs. Violent crimes continued to grow and had jumped for a third time by 2016.¹⁰ Increased incidents of crime and drug related offences have been linked to areas with higher concentrations of poverty. According to the Fair Housing Survey, only 46.7 percent of public housing residents felt safe or very safe in their public housing development at night, and 38.6 percent felt safe or very safe in their neighborhood at night.</p> <p>Violent and drug related crime in public housing directly impacts access to healthy neighborhoods. Residents in R/ECAPs are facing diminished access to healthy neighborhoods, and therefore this factor is rated as a high priority.</p> <p>HACoLA has engaged in crime and safety programs, including the Community Policing Team (CPT) Program, and Crime Prevention through Environmental Design. However, crime and safety are a continued issue for public housing residents. Continued efforts are necessary to reduce the number of violent and drug related crime incidents in public housing.</p>	<p>HACoLA</p>
Minority and low-income communities experience higher rates of crime and violence	High	<p>As demonstrated by higher levels of crime in R/ECAP areas, access to safe neighborhoods are limited for low-income household. The perception of neighborhood safety is markedly lower for low income and minority households. Only 68.9 percent of households below the Federal Poverty Line (FPL) felt their neighborhoods were safe, compared to almost 80 percent of households between 100 and 199 percent FPL.¹¹ In addition, Latino and African American households were more than 15 percentage points lower in perceived neighborhood safety than white households. The Portrait of Los Angeles County report found that areas in Los Angeles County, including Cudahy, Westmont, Lennox, East Rancho Dominguez, and Florence-Graham, have higher crime rates.¹²</p> <p>Disproportionate rates of violence and crime create disproportionate access to healthy neighborhoods. The factor is selected as high priority because of the impact on minority and low-income communities, and the disparities in access to safe neighborhoods and environments.</p> <p>The CDC and HACoLA's efforts to address crime and violence in minority and low-income communities will increase access to healthy neighborhoods. The CDC and HACoLA will establish goals to increase resources to combat the disproportionate rate of violence and crime for these communities.</p>	<p>Los Angeles Urban County</p> <p>HACoLA</p>

¹⁰ <http://www.latimes.com/local/lanow/la-me-crime-stats-20161227-story.html>

¹¹ <http://www.publichealth.lacounty.gov/ha/LACHSDataTopics2015.htm>

¹² <https://ssrc-static.s3.amazonaws.com/moa/PoLA%20Full%20Report.pdf>

Impediments/Contributing Factor	Priority	Justification	Service Area
Criminal activity in public housing facilities	High	<p>Crime data reported by Los Angeles County, as well as public sentiment, pointed to a high level of need for public safety measures. This is particularly striking in R/ECAPs. According to the 2017 Fair Housing Survey, an estimated 37 percent of residents in R/ECAPs felt unsafe in their neighborhood at night, compared to 20 percent for the Urban County overall. According to the Fair Housing Survey, only 46.7 percent of public housing residents felt safe or very safe in their public housing development at night, and 70.6 percent felt safe or very safe in their development during the day.</p> <p>Criminal activity in public housing facilities not only impacts the residents' quality of life but also access to healthy neighborhoods. This impact on fair housing issues places this factor as a high priority.</p> <p>HACoLA has engaged in a variety of efforts to decrease criminal activity. Continued efforts are necessary to increase access to safe and healthy neighborhoods and diminish disparities in access to opportunity.</p>	HACoLA
Juvenile crime activity	High	<p>The rate of juvenile crime, echoing the rate of the crime statistics, is prevalent in lower income communities. In 2015, the juvenile felony arrest rate was 513 per 100,000 county-wide.¹³ This rate has lowered over the past couple years for the County.</p> <p>Disproportionate rates of juvenile crime activity not only affects the residents' quality of life but also creates disproportionate access to healthy neighborhoods. The factor is selected as high priority because of the impact on minority and low-income communities, and the disparities in access to safe neighborhoods and environments.</p> <p>HACoLA has undertaken the Juvenile Justice Crime Prevention Act (JJCPA) Program to encourage lower rates of juvenile crime. The CDC also funds a gang and drug intervention program for youth in the RECAP areas. While rates are lowering county-wide, they still remain a crucial issue for neighborhood safety and access to healthy neighborhoods. Continued efforts to combat juvenile crime may help lower the disparities in access to safe and healthy neighborhoods.</p>	Los Angeles Urban County HACoLA
Increase independence for the elderly or families with disabilities	High	<p>The 2015 County Health survey found that 22.6 percent of the population had a disability and 41.9 percent of those over 65 had a disability. In addition, those under the FPL had a higher disability rate than average, at 28.6 percent. Independence is reliant on access to a variety of components, including accessibility and services. Barriers to mobility and access to accessible housing are two primary hurdles to increasing independence.</p> <p>Limited independence for the elderly or families with disabilities is a primary barrier for access to housing options and opportunity. This factor contributes directly to fair housing issues, such as disparity in access to opportunity, and is therefore rated as a high priority.</p> <p>Efforts to increase independence will help integrate households with disabilities and negate any disparities in access to opportunity. HACoLA's established goals to encourage independence will support overarching fair housing goals and provide more equitable access to housing.</p>	HACoLA
People with disabilities becoming homeless	High	<p>Homelessness continues to be a major issue in Los Angeles County, and increased by 23 percent between 2016 and 2017 to 57,794 county-wide.¹⁴ In 2016, more than 15 percent of the homeless population had a physical disability, and more than 3 percent had a developmental disability.¹⁵</p> <p>Homelessness is a critical issue throughout Los Angeles County, particularly for households with disabilities. This contributing factor limits access to housing options and is considered a high priority.</p> <p>Identifying people with disabilities at risk of becoming homeless will decrease the number of persons who enter homelessness each year. HACoLA will address the growing need for affordable and accessible housing by setting goals that target at-risk persons with disabilities.</p>	HACoLA

¹³ <http://casi.cjg.org/Juvenile/Los-Angeles>

¹⁴ <https://www.lahsa.org/documents?id=1385-2017-homeless-count-results-los-angelescounty-presentation.pdf>.

¹⁵ <https://www.lahsa.org/dashboards?id=18-2016-greater-los-angeles-homeless-count-demographic-summary>

Impediments/Contributing Factor	Priority	Justification	Service Area
Lack of mental health services for school age children of public housing	High	<p>Mental health concerns continue to be a crisis for public housing residents, impacting school age children. An estimated 7.4 percent of children in LA County attempted to access mental health care.¹⁶ The incidence of violence and poverty have a documented impact on mental health for children, coupled with limited access to mental health services has continued to keep child mental health as a high priority.¹⁷</p> <p>Access to mental health services is an essential part of a healthy household and community, and limited access is a part of limited access to healthy communities. This factor is set as a high priority because of its impact on households' ability to access healthy neighborhoods and vital services.</p> <p>Although HACoLA has promoted mental health activities in the past, there is a continued need within public housing to promote access to mental health, particular for school aged children. Efforts to increase access must be implemented in order to eliminate any disparities in access to these services.</p>	HACoLA
Access to affordable internet	Moderate	<p>Data and public input have revealed a digital divide for low income households that do not have equitable access to affordable internet options. Areas with higher concentrations of poverty in LA County are the least connected to internet options.¹⁸ About a third of low-income households do not have internet, more than double the general population.¹⁹</p> <p>This digital divide may have far reaching consequences, including limitations to service information, and limited access to educational and employment opportunities. This creates disparities in access to opportunity, but is rated as a moderate priority due to a lack of HACoLA resources to address the factor on a wide scale.</p> <p>Efforts to decrease the digital divide will help eliminate the disparities in access to educational and employment opportunities. HACoLA efforts must attempt to bridge this divide in order to establish more equitable access to opportunities in the County.</p>	HACoLA
Industries not in compliance with health regulations - Pollution in Neighborhoods	Moderate	<p>Access to healthy neighborhoods is markedly diminished in low income areas and R/ECAPs from industry practices. However, industry practices are not within the authority of HACoLA. The highest rates of pollution were found in areas of high poverty, and according to the Portrait of LA County report, were in Cudahy, Westmont, Lennox, East Rancho Dominguez, and Florence-Graham.²⁰ In addition, Latino, black, Native Hawaiian or other Pacific Islander (NHOPI) and Native American households were more likely to be in areas with high pollution levels.²¹</p> <p>Pollution directly impacts health and access to healthy neighborhoods. Disproportionate access to healthy neighborhoods for low-income and minority population creates a significant need. However, the ability of HACoLA to address industry policy is limited, and therefore this factor is weighed as moderate.</p> <p>Efforts by HACoLA to diminish disparities in access to healthy neighborhoods may be achieved through increased access and dissemination of information to residents. HACoLA goals to decrease exposure to pollution will help increase access to healthy neighborhoods.</p>	HACoLA

¹⁶ <http://publichealth.lacounty.gov/ha/LACHSDataTopics2015.htm#Child>

¹⁷ <https://www.urban.org/urban-wire/povertys-toll-mental-health>

¹⁸ <http://arnicusc.org/wp-content/uploads/2017/07/Policy-Brief-2.pdf>

¹⁹ <http://arnicusc.org/wp-content/uploads/2017/07/Policy-Brief-2.pdf>

²⁰ <https://ssrc-static.s3.amazonaws.com/moa/PoLA%20Full%20Report.pdf>

²¹ <https://ssrc-static.s3.amazonaws.com/moa/PoLA%20Full%20Report.pdf>

Impediments/Contributing Factor	Priority	Justification	Service Area
Illegal Dumping - Proximity to environmental hazards, especially in communities of color	High	<p>Environmental hazards are more likely to impact low-income households and R/ECAPs, as shown by the Environmental Health Index, the CalEnviroScreen, and the consultation process. Latino, black, NHOPU, and Native American households were more likely to be in areas with high pollution levels.²²</p> <p>These hazards limit access to healthy neighborhoods and increase health hazards in vulnerable communities. This diminished access to healthy neighborhoods is a contributing factor to fair housing issues and is rated as a high priority.</p> <p>Efforts by HACoLA to diminish disparities in access to healthy neighborhoods may be achieved through increased monitoring and information. HACoLA goals to decrease exposure to pollution will help increase access to healthy neighborhoods.</p>	HACOLA
Enhance adequacy of life skills (e.g. Housekeeping, healthy eating, financial management)	Moderate	<p>The 2015 LA County Health survey indicated that households below the FPL may have less access to support for enhancing life skills. Additionally, public involvement and consultation provided insight on inadequacy of life skills for many households throughout the County. These may include housekeeping, healthy eating, and financial management.</p> <p>The impact of life skills on quality of life and access to healthy neighborhoods is a contributing factor to fair housing issues and disproportionate access to opportunity. The capacity of HACoLA to impact these skills may be minimal on a large scale, and is therefore rated as a moderate priority.</p> <p>Efforts to increase the adequacy of life skills may impact the disparity in access to opportunity by increasing access to healthy neighborhoods. HACoLA will enhance current programs to increase life skills.</p>	HACOLA
Enhance air quality within housing development sites	Low	<p>Studies have found that public housing residents nationwide are twice as likely to have asthma as the general population, advocating for the elimination of smoking in public housing units.²³ In December, 2016, HUD published a final rule requiring public housing agencies to initiate a smoke-free policy by July, 2018.</p> <p>Diminished access to healthy air limits access to healthy neighborhoods. While enhancing air quality within housing development sites is of high importance, HACoLA has already made great strides in improving air quality and rates it as a priority of low.</p> <p>Between 2013 and 2014, HACoLA implemented a smoke-free policy for its housing developments to protect the residents, including families, youth, and the elderly and disabled. HACoLA continues to make strides to protect the air quality within housing development sites, and promote the health of all public housing residents.</p>	HACOLA
Instances of absentee/bad landlords	Low	<p>The cases of bad and absentee landlords, as established by public input, diminish the quality of housing options for many low-income households throughout the Urban County. Over 19 percent of respondents to the Fair Housing survey indicated that they were not able to communicate with their landlord; and 21 percent of public housing residents were not able to communicate with their landlord. For the public housing program, HACoLA will improve the perception of absentee landlords by effectively communicating and meeting with the residents.</p> <p>The impact of these landlords on sub-par conditions is important in establishing equal access to housing, however, may be difficult to monitor on a County-wide scale, especially in the private rental market. While this may impact access to housing options, this factor has been rated as a low priority.</p> <p>Efforts to increase the responsibility of landlords will help encourage access to housing options. Establishing goals may be limited by the capacity of HACoLA, but may be focused on public housing residents to increase access to opportunity.</p>	HACOLA

²² <https://ssrc-static.s3.amazonaws.com/moa/PoLA%20Full%20Report.pdf>

²³ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4716462/>

Impediments/Contributing Factor	Priority	Justification	Service Area
Lack of opportunities for residents to obtain housing in higher opportunity areas	High	<p>As seen in the Disparities in Access to Opportunity section of this document, R/ECAPs have a markedly lower level of access to education, employment, and healthy neighborhoods. A lack of affordable housing options in higher opportunity areas, with access to transportation, jobs, and education, limit access to these areas for low income and racial and ethnic minority households.</p> <p>Lack of opportunities for residents to obtain housing in higher opportunity areas directly contributes to fair housing issues of disparities in access to opportunity. This contributing factor has been rated as a priority due to the level of disparate impact on fair housing choice for minority and low income households.</p> <p>Efforts to increase access to high opportunity areas have not mitigated the disparity in access to opportunity faced by households in low opportunity areas. Increasing housing options in high opportunity areas, through measurable goals, will help establish higher levels of access to minority and low income households.</p>	HACOLA
Lack of knowledge of Fair Housing, Section 504 and ADA laws	High	<p>The Fair Housing survey indicated that 39 percent of respondents were not aware of their right to request accommodations. Fair housing outreach indicated a lack of knowledge of fair housing, Section 504 and ADA laws throughout the Urban County. In addition, some 30.9 percent of public housing resident respondents were not aware of their rights to request accommodations.</p> <p>Limited knowledge limits access to services for eligible households. This limited access is a contributing factor to fair housing in limiting access to opportunity. This factor is rated as a high priority.</p> <p>HACoLA efforts to increase knowledge of fair housing laws will continue and increase access to opportunities and decrease disparities for households with disabilities.</p>	HACOLA
Disconnect in matching people with disabilities with the right housing resources	High	<p>The Fair Housing survey indicated that 39 percent of respondents were not aware of their right to request accommodations, and 11 percent were in need of a housing accommodation. Additionally, consultation with agencies and public input indicated that eligible households were not effectively matched with appropriate resources, especially accessible housing options.</p> <p>Persons with disabilities that are not matched with appropriate services are contributing factors to fair housing issues and decreasing access for persons with disabilities to housing options. This factor is rated as a high priority due to its impact on fair housing.</p> <p>HACoLA has increased efforts to match persons with disabilities with services, but are not currently meeting the existing need. Establishing goals to remediate this factor through increased services will help close the gap in disparate access.</p>	HACOLA
Discrimination in the private accessible rental markets	High	<p>According to Fair Housing public input and HMDA households with disabilities face discrimination in private rental and homeowner markets. HUD Fair Housing Complaint Data showed over 2,600 complaints between 2008 and 2016 for Los Angeles County, with the most common basis of these complaints being a disability.</p> <p>Discrimination in accessible units has been selected as a high priority because it related directly to fair housing and access to opportunity.</p> <p>Although efforts had been made to investigate violations of fair housing law in the past, discrimination still remains an on-going continuing factor that limits access to fair housing. As a high priority, HACoLA will continue efforts to enhance access to housing options and resources to encourage fair housing practices in the marketplace.</p>	HACOLA

Impediments/Contributing Factor	Priority	Justification	Service Area
Disparities in job readiness and educational achievement	High	<p>The Education index as well as other data sources, indicated a marked disparity in school proficiency. While white households had a school proficiency index of 73.65, black and Hispanic household indices were 44.24 and 44.35, respectively. This disparity in job readiness has far reaching consequences, including future economic opportunities.</p> <p>Disparities in job readiness and educational achievement has been placed as a high priority due to its impact on fair housing issues and access to opportunity. This factor limits access to fair housing choice and economic security.</p> <p>Since disparities in access still exist in the County, particularly for racial and ethnic minorities, HACoLA will set goals to ensure meaningful actions are implemented to increase job readiness and educational achievement, so disparities in access can be reduced.</p>	HACOLA
Availability of scholarships	Moderate	<p>Limited availability of scholarships create a barrier for households to access proficient educational opportunities. As seen in the School Proficiency Index, some racial and ethnic minorities overall, and R/ECAPs experience lower levels of school proficiency compared to white households in the Urban County. Black and Hispanic households have a school proficiency index of 44.2 and 44.4, respectively, compared to 73.7 for white households.</p> <p>The limited availability of scholarships limits access to education opportunities. This factor is related to the fair housing issue of access to opportunity, but is not within the capacity of HACoLA to impact on a wide scale, and is therefore rated as a moderate priority.</p> <p>Efforts to increase access to educational opportunities will decrease the disparities in access to educational opportunities for low income households. R/ECAPs with particularly low school proficiency and educational achievement levels can be directly impacted by efforts to increase access to sustained educational opportunities.</p>	HACOLA
Enhance programs to help at-risk homeless population	High	<p>Homelessness continues to be a major issue in Los Angeles County, and increased by 23 percent between 2016 and 2017 to 57,794 county-wide.²⁴ More than 74 percent of the counted homeless population in 2017 were unsheltered.</p> <p>The growing rate of homelessness places this factor as a high priority in the County.</p> <p>While HACoLA have taken substantial efforts to combat homelessness, it continues to be a growing problem in the County. In an effort to help stabilize and even reduce homelessness, HACoLA will establish goals to provide services for at-risk households. Any effort to help reduce the growth of the homeless population will help decrease disparities in access to housing options.</p>	HACOLA
Access to transportation	Low	<p>A 2017 Metro study found that 84 percent of bus riders did not have a car, and that the median income for riders in 2016 was \$15,620.²⁵ Public input and consolation activities reiterated the fact that many households with children struggle to access transportation options, limiting access to opportunity.</p> <p>Limited access to transportation is a key component in access to fair housing and disparities in access to opportunities. Limited access to transportation for families, including parents and children is rated as a low priority for addressing fair housing issues in the County due to a lack of capacity for HACoLA to address this factor.</p> <p>However, HACoLA has undertaken programs to increase access to transportation services, but the gap in access persists. Increasing the availability of transportation options for parents and children will help close this gap in access to opportunity.</p>	HACOLA

²⁴ <https://www.lahsa.org/documents?id=1385-2017-homeless-count-results-los-angelescounty-presentation.pdf>.

²⁵ <https://www.metro.net/about/metro-disparity-study/>

Impediments/Contributing Factor	Priority	Justification	Service Area
Lack of resources and services for working families (e.g., helping find housing for minorities)	High	<p>Resources and services for working class families are essential to bridge the gap in access to housing and other services. 2015 Health Survey data suggest that low income households have lower knowledge about where to turn for support when compared to higher income households.</p> <p>A lack of these resources acts as a barrier in access, and remains a high contributing factor to access to fair housing. This factor has been rated as a high priority due to its impact on access to opportunity.</p> <p>Increasing access to resources and services will help decrease any disparities in access to opportunities for low income households. Efforts by HACoLA can be achieved in measurable goals to connect working families with applicable resources.</p>	HACOLA
Access to affordable childcare	Moderate	<p>Affordable childcare is a barrier for many households to enter or remain in the workforce, with an estimated 31.6 percent of LA County housing facing difficulties finding childcare.²⁶ The rate was even higher for those living below the FPL, at 41.9 percent. Public involvement and outside consultation reiterated the importance of affordable childcare that acts as a barrier to economic opportunities for low income households.</p> <p>Access to affordable childcare is directly linked with access to employment. Inequitable access to childcare create disproportionate access to opportunity and therefore is a contributing factor to fair housing issues. While it is vital for households to have access to childcare options, it is not within the ability of HACoLA to impact change on a wide scale. Therefore, this factor is rated as moderate.</p> <p>While there have been past efforts to increase access to childcare, it still remains a critical issue for many households. Any efforts by HACoLA to increase access to services will decrease disparities in access to opportunity for low-income households.</p>	HACOLA
Enhance place based investments	Moderate	<p>The availability of services and access to opportunities varies for protected classes in Los Angeles County. This is exemplified by the opportunity index, such as access to low poverty areas. While non-Hispanic white households have a low poverty index of 70.81, black households have an index of 48.72, and Hispanic households have an index of 41.00.</p> <p>Disparities in access to opportunity are directly linked to limiting access to fair housing. Enhancing place based investments will increase access to opportunity and is therefore rated as a moderate priority.</p> <p>HACoLA will increase place based investments through the use of additional funding for rental assistance, resident service programs, and addressing homelessness.</p>	HACOLA
Facilitate Access to proficient schools	Moderate	<p>Minority populations in the Urban County have significantly lower school proficiency indices than white non-Hispanic households. While white households have index ratings at 73.66 for school proficiency, black households have 44.24, and Hispanic households have 44.35.</p> <p>Disparities in access to opportunity, such as disparities in access to proficient schools are a significant issue for the Urban County. However, due to the lack of control over the education system, facilitating access to proficient schools has been rated as a moderate priority.</p> <p>HACoLA will continue to increase access to educational opportunities for public housing residents in an effort to increase access to proficient schools, and decrease disparities in access to opportunity.</p>	HACOLA

²⁶ <http://publichealth.lacounty.gov/ha/LACHSDataTopics2015.htm#Child>

General policy statements with respect to all goals and actions below.

Compliance with Federal Accessibility Standards

Because the County and HACoLA each receive federal assistance, all programs and activities, including those below in the goals, are covered by Section 504 of the Rehabilitation Act (Section 504) and HUD's implementing regulation at 24 CFR part 8. Accordingly, the County and HACoLA will comply with Section 504 obligations, including the requirement to comply with accessibility requirements, in all funded housing (not just affordable housing) and all programs. For purposes of Section 504 compliance, the design, construction, or alteration of housing and other facilities that are part of the County's and HACoLA's programs will conform to the Uniform Federal Accessibility Standards (UFAS), or the 2010 Americans with Disabilities Act (ADA) Standards for Accessible Design, except for certain specific identified provisions, as detailed in HUD's Deeming Notice, <http://www.gpo.gov/fdsys/pkg/FR-2014-05-23/pdf/2014-11844.pdf>. Section 504 requires at least 5% of dwelling units for individuals with mobility impairments and an additional 2% of dwelling units, as well as public and common areas, for individuals with sensory impairments to comply with the UFAS and/or HUD's Deeming Notice.

Further, the County and HACoLA, as public entities, will comply with Title II of the ADA and its implementing regulation at 28 CFR part 35. The 2010 ADA Standards for Accessible Design (2010 ADA Standards) will also be followed for new construction, alterations, and program access in existing facilities as of March 15, 2012. Both Section 504 and Title II of the ADA also have program requirements in which the County and HACoLA will follow. Finally, as applied by the Fair Housing Act, covered County and HACoLA multifamily dwellings, including all ground floor units in non-elevator buildings and all units in elevator buildings, as well as public and common use areas, will meet the design and constructions requirements under the Act. The County and HACoLA will also comply with all other applicable state and federal laws.

Balanced Approach to Developing Affordable Housing

The County and HACoLA will take a balanced approach in the development of all affordable housing constructed pursuant to the goals and metrics established below. Specifically, the County and HACoLA will provide a wide range of housing choices, including outside of areas of racial and ethnic concentration in the development of this housing.

Table I.4. A
County of Los Angeles: Analysis of Impediments to Fair Housing Choice/ Assessment of Fair Housing
Fair Housing Goals, Issues, and Proposed Achievements: CDC Urban County

Fair Housing Goal	Impediments to Fair Housing Choice (Impediments)/ Contributing Factors	Fair Housing Issue	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
<p>Enhance accessible facilities and infrastructure for persons with disabilities</p>	<p>Barriers to mobility</p>	<p>Disparities in Access to Opportunity</p>	<p>Perform 20 curb cut projects serving 50,000 people within five years. The annual goal is to perform five (5) curb cut projects per year serving 10,000 people. This will consist of upgrading, installing, or replacing sidewalks to improve accessibility for persons that are disabled.</p>	<p>CDC and Participating Cities</p>
			<p>Perform 10 public facility projects within five years. The annual goal is to perform two (2) public facility improvement projects per year to either City Halls or Parks to improve accessibility for persons that are disabled.</p>	<p>CDC and Participating Cities</p>
<p>Discussion: The provision of accessible sidewalks, parks and city halls for persons with disabilities has been a significant issue, as reported from the Disability and Access Focus Group, per HUD data, and per local data. This issue was also raised by members of the general public during the Community Meetings. In providing additional accessibility in key areas of the County, persons with disabilities will have greater access to service options.</p> <p>Enhancing access to facilities and infrastructure for persons with disabilities will address barriers to mobility for persons with disabilities. These actions, undertaken by the CDC and Participating Cities, are designed to reduce the disparities in access to opportunity for persons with disability.</p>				

Fair Housing Goal	Impediments/ Contributing Factors	Fair Housing Issue	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
<p>Promote more affordable housing for special needs populations</p>	<p>Lack of affordable housing in a range of sizes</p>	<p>Segregation Disparities in Access to Opportunity Disproportionate Housing Needs</p>	<p>Issue funding through affordable housing Notice of Funding Availability (NOFA) that targets the production of affordable housing for Special Needs populations, including Homeless, Chronically Homeless, Homeless Veterans, Mentally Ill, HIV/AIDS, Developmentally Disabled, and Frequent Users of the County’s Health and Mental Health systems. Include requirements in NOFA funding agreements that projects must incorporate affirmative marketing, tenant selection, and reasonable accommodation practices that fully comply with federal Fair Housing Act (FHA) and the California Fair Employment and Housing Act (FEHA). Allow for a range of unit sizes in funded projects and allow for new construction and rehabilitation projects. Construct 900 units of housing within five years. Work with the Department of Regional Planning to evaluate density bonus requests and record affordability covenants on density bonus units. Also, use Land Use Initiatives that will increase affordable units such as the Marina del Rey Affordable Housing Policy, which applies to the Urban County.</p>	<p>CDC</p>
<p>Discussion: The demand for more affordable housing comes from many sectors throughout the LA County Service Area including but not limited to persons with disabilities, the elderly, persons who are transgender, gender non-binary, and gender non-conforming, or racial and ethnic communities as evidenced by focus groups, survey responses, HUD data, and local data. The investment decision making process should consider the location of new or rehabilitated housing units. New construction and rehabilitation projects should be directed toward higher opportunity areas.</p> <p>Promoting more affordable housing for special needs populations is a concerted county-wide effort to decrease the disproportionate housing needs and disparities in access to opportunity for special needs populations. These efforts to produce additional housing units and encourage housing options are aimed at creating additional opportunities for in need households.</p>				

Fair Housing Goal	Impediments/ Contributing Factors	Fair Housing Issue	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Enhance accessible housing and supportive services to persons with disabilities	Lack of sufficient accessible housing in a range of unit sizes	Disparities in Access to Opportunity	<p>Require construction and renovation of accessible units (mobility and sensory) to fully comply with the 2010 ADA Standards of Accessible Design and federal Fair Housing Act. Require all projects with federal funding to fully comply with Section 504 obligations, which may be satisfied by compliance with ADA standards with certain exceptions stated in HUD's Deeming Notice that require compliance with Uniform Federal Accessibility Standards (UFAS). Projects that receive capital funds issued through the CDC's Notice of Funding Availability (NOFA) will be required to provide a minimum of accessible units that is twice the minimum requirement of ADA Title II and California Building Code Chapter 11B. Projects will be required to provide 10% mobility units and 4% sensory units. All accessible units will be certified by California Access Specialists (CASp) consultants, but also fully inspected and certified for ADA and UFAs requirements. All accessible units must be listed on the Los Angeles County Housing Resource Center website. Require that senior units be constructed to meet Universal Design requirements, which includes accessibility features. 125 housing units will be developed over the five year period. The annual goal is 25 housing units.</p> <p>Include requirements in NOFA funding agreements that projects must incorporate affirmative marketing, tenant selection, and reasonable accommodation practices that fully comply with federal Fair Housing Act (FHA) and the California Fair Employment and Housing Act (FEHA).</p>	CDC
Enhance accessible housing and supportive services to persons with disabilities (continued)	Barriers to mobility	Segregation Disparities in Access to Opportunity	<p>Include requirements in NOFA funding agreements that projects must incorporate affirmative marketing, tenant selection, and reasonable accommodation practices that fully comply with federal Fair Housing Act (FHA) and the California Fair Employment and Housing Act (FEHA). Fund the Los Angeles County Housing Resource Center in order to provide an accessible website and call center that can assist persons with disabilities in locating units with accessibility features.</p> <p>Provide annual funding with HPI funds. Renew contract in December 2020.</p>	CDC

	Lack of sufficient publicly supported housing for persons with HIV/AIDS	Disparities in Access to Opportunity	Include HIV/AIDS as a unit type that is eligible for funding under the affordable housing Notice of Funding Availability. Construct 50 housing units over the five year period.	CDC
	Land use and planning decisions restrict fair housing choice for persons with disabilities and affordable housing in general	Segregation Disparities in Access to Opportunity Disproportionate Housing Needs	Continue to review Housing Element and other plans as well as planning decisions for inconsistencies with land use and State law regarding affordable housing and fair housing requirements for persons with special needs in Year 1. In Years 2-5, work with Agencies by holding meetings/trainings/discussions to make any necessary improvements to the plans and policies. Identify any policy changes and work with Regional Planning and Cities to address.	CDC Participating Cities Regional Planning
<p>Discussion: The provision of housing and housing related services to persons with disabilities has been a significant issue, as reported from the Disability and Access Focus Group and the general public during Community Meetings, and Resident Advisory Board Meetings, as well as HUD data and local data. There is not a sufficient number of affordable and accessible housing units available, as demonstrated by public input and available data. This is further complicated by land use and planning decisions that hinders affordable housing and fair housing choice for persons with disabilities. See Section IV of this report for further detail of housing element compliance and whether any cities contribute to fair housing issues.</p> <p>The CDC and Participating Cities will engage in enhancing accessible housing and supportive services to persons with disabilities in order to address the fair housing issues that restrict choice. These efforts will address the lack of sufficient housing options, barriers to mobility, and planning restrictions that contribute to segregation, disparities in access to opportunity and disproportionate housing needs.</p>				

Fair Housing Goal	Impediments/ Contributing Factors	Fair Housing Issue	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
<p>Promote healthy communities</p>	<p>Presence of lead poisoning exposure</p>	<p>R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Need</p>	<p>The CDC will continue to implement HUD Lead Based Paint Regulations (Title X), which requires federally funded rehabilitation projects to address lead hazards by procuring with Certified Lead Consultants to conduct testing on all CDC existing loan and grant commercial and housing rehabilitation programs. The Lead Consultants will review 164 homes and commercial buildings for the presence of Lead-Based Paint each year (Years 1-5) Additionally, a Lead Abatement Program is offered to address hazardous materials including lead based paint, asbestos, mold, and other environmental hazards. This Program is also offered to first time homebuyers to assist in addressing lead based paint hazards at the close of escrow. First-time homebuyers participating under the HOME-funded Home Ownership Program (HOP) will have lead-based paint inspections and clearance reports for all homes built before 1978. Review 820 homes and businesses for the presence of lead-based paint. Ensure all homes are lead safe when performing rehab activities. This includes areas in participating cities, R/ECAPS, and unincorporated areas.</p>	<p>CDC Participating Cities</p>
	<p>There are significant disparities in the proportion of members of protected classes experiencing substandard housing when compared to the total population.</p>	<p>R/ECAPS Disproportionate Housing Needs</p>	<p>Loans, grants, and handyworker assistance will be provided to residents to repair their homes so that they are brought up to standard condition and meet health and safety standards. Repairs can include, but are not limited to, roofing, electrical, plumbing, and lead based paint hazard measures. Handyworker programs will consist of minor repairs. 150 housing units will be assisted per year with a total 5-year goal of 750 housing units. Areas targeted included R/ECAP areas and adjacent unincorporated areas.</p>	<p>CDC</p>
	<p>Noise Pollution due to plane traffic from Los Angeles International Airport (LAX)</p>	<p>R/ECAPs and other areas near LAX Disproportionate Housing Need</p>	<p>Provide for the preservation of affordable single- and multi-family housing within the Athens and Lennox Area Airport Noise Compatibility Program. Complete 114 single- (570 over the five years) and 75 multi-family (375 over the five years) grants with CDBG annually. Use CDBG funds for code violation correction and leverage \$7.5 million from Los Angeles World Airports (LAWA) to</p>	<p>CDC</p>

Promote healthy communities (continued)			sound mitigate properties in conjunction with Lennox Health and Safety, RSIP 5-Year plan. FAA/LAWA & CDBG funding requirement to sound insulate 2,000 dwelling units is estimated to cost \$98 million. CDBG funds represent 5% or \$4.9 million of the above figure. R/ECAP areas to be targeted: Athens-Westmont and Lennox.	
	Poor land use and zoning situating sources of pollution and environmental hazards near housing	R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs	Continue policy in the Notice of Funding Availability that applicants that propose projects within 500 feet of a freeway will not qualify for funding such as HOME Partnerships Investment and other applicable funding. Train participating cities in Year 1 to consider implementing the policy within their jurisdictions.	CDC Participating Cities
		R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs	Review Housing Element and other plans for inconsistencies with land use and environmental hazards in Year 1. In Years 2-5, work with Agencies by holding meetings/trainings/discussions to make any necessary improvements to the plans.	CDC Participating Cities
	Access to quality healthcare	R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs	A Community Clinic will serve 60 (300 over five years) low- and moderate-income persons in unincorporated and R/ECAP areas each year. The clinic will offer services such as wellness visits and school physicals, women's health services, STD testing, health maintenance guidance, primary care visits, prenatal exams, pediatric care, and mental health services. R/ECAP area targeted include Athens-Westmont, Florence/Firestone, and Willowbrook.	CDC
	Food insecurity Access to healthy and nutritious food options	R/ECAPs Disparities in Access to Opportunity	Food Distribution & CalFresh Applicants Outreach Project. Assist 1,200 people each year for a total five year goal of 6,000. This program will provide fresh and non-perishable foods to low- and moderate-income individuals and families to increase their health outcomes. In addition, participants will be assisted in accessing resources for food assistance. R/ECAP areas include Athens-Westmont, Florence/Firestone, and Willowbrook.	CDC

Discussion: The R/ECAP areas throughout the Los Angeles County Service Area tend to have substantive public health issues, such as noise pollution, toxic emissions or other environmental hazards, as evidenced by HUD data and local data. It remains important to educate our clientele about the risks of such exposures. These health issues were made apparent in community input and health-related research in LA County. Planning and zoning regulations may have contributed to this problem, so it is important that we review the local planning and zoning issues for those areas that are in or near the R/ECAPs. We also need to assist in making access to healthy food choices easier, take the initiative to conduct outreach to the community, and resolve our food deserts by increasing access to healthy foods. To address noise pollution in R/ECAPs, we will need to assist homeowners and owners of multi-family units with sound insulation improvements.

The CDC will undertake promoting healthy communities through these actions, designed to address contributing factors to fair housing issues, such as food insecurity, presence of lead poisoning, noise pollution, disparities in substandard housing, and access to quality healthcare. These individual, and measurable metrics will help the CDC and participating cities address disparities in access to opportunity and disproportionate housing needs.

Fair Housing Goal	Impediments/ Contributing Factors	Fair Housing Issue	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
<p>Enhance and create viable communities</p>	<p>Location and access to local businesses, especially in economically depressed areas</p>	<p>R/ECAPs Disparities in Access to Opportunity</p>	<p>Technical Assistance Program. Serve 90 businesses per year with a total five year goal of 450 with technical assistance to improve their operations. R/ECAP targeted is Florence/Firestone.</p>	<p>CDC</p>
			<p>Second Districtwide Community Business Revitalization Program. Façade improvements to businesses. The program targets businesses in low- and moderate-income unincorporated and R/ECAP areas. Assist two (2) businesses per year with a total five year goal of 10. R/ECAPS and other primarily minority, low- and moderate income areas.</p>	<p>CDC</p>
	<p>Lack of Information on Affordable Housing</p>	<p>R/ECAPS Segregation</p>	<p>Attend affordable housing events to distribute information to the public and developer communities, host stakeholder meetings for County affordable housing initiatives and available sources of funds for development of affordable housing, and support the efforts of the Southern California Association of Nonprofit Housing. Engage in Countywide efforts to market the on-line Los Angeles County Housing Resource Center (housing.lacounty.gov) through on-line links, and wide distribution of flyers at community events, landlord tradeshows, and any specialized citizen information fair or event. Expand marketing to include partner websites in Los Angeles and Pasadena. Provide toll-free bilingual call center with TTY number, and Section 508 Accessible website. Require all CDC funded projects to register on website. Maintain and execute two 1 year contract renewals with Emphasys Software to manage websites in LA County, City of LA, and Pasadena to keep contract through Dec. 2020. Seek funding authority to execute new sole source contract in 2020.</p>	<p>CDC</p>

<p>Enhance and create viable communities (<i>continued</i>)</p>	<p>Increasing measures of segregation</p>	<p>Segregation</p>	<p>Develop target program for the production of affordable rental housing in areas with low instances of minorities. 10 units per year with a total five year goal of 50. Include requirements in NOFA funding agreements that projects must incorporate affirmative marketing, tenant selection, and reasonable accommodation practices that fully comply with federal Fair Housing Act (FHA) and the California Fair Employment and Housing Act (FEHA).</p>	<p>CDC</p>
			<p>The CDC will oversee leasing of affordable rental units in areas such as West Hollywood (HOME-funded and bond financed units) and Marina del Rey (land use restrictions under the Marina del Rey Affordable Housing Policy. The County has also funded projects in Santa Monica. Oversee lease up of 128 affordable units in unincorporated areas with low instances of minorities within 5 years.</p>	<p>CDC</p>
<p>Discussion: Enhancing and creating viable communities throughout the LA County Service Area is strongly desired by many throughout the service area. Community input, HUD data, and local data were clear on this point. Implementation barriers include lack of investment or business assistance and segregation in some parts of the service area in the R/ECAP areas as well as information on affordable housing and the segregation of some areas of the service area.as well as the availability of information on affordable housing.</p> <p>The CDC’s effort to enhance and create viable communities is an effort designed to increasing measures of segregation, lack of information regarding affordable housing, and the location and access to viable businesses. Addressing these contributing factors will help address disparities in access to opportunity and segregations, as well as R/ECAPs.</p>				

Fair Housing Goal	Impediments/ Contributing Factors	Fair Housing Issue	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
<p>Promote understanding and knowledge of fair housing and ADA laws</p>	<p>Discrimination in private rental and homes sales markets</p>	<p>Disparities in Access to Opportunity Discrimination Segregation</p>	<p>Serve 230 households per year (1,150 over the five year period) with investigation of alleged violations of fair housing law. Counseling and/or cases will be opened or referred to other agencies.</p> <p>Annually report where they currently live, where the alleged infraction occurred, protective class, and issue code (type of discrimination, etc.). This data will be collected to determine patterns of discrimination affecting mobility. This will allow us to target resources as necessary either during the five (5) year period or for the next AI.</p> <p>Include requirements in NOFA funding agreements that projects must incorporate affirmative marketing, tenant selection, and reasonable accommodation practices that fully comply with federal Fair Housing Act (FHA) and the California Fair Employment and Housing Act (FEHA).</p>	<p>CDC</p>
			<p>The following training activities will be held to bring awareness to fair housing issues affecting persons accessing the private rental and home sales markets: Distribute 16,000 pieces of literature per year (80,000 over the five year period). Conduct 16 outreach and educational presentations and workshops per year to inform special populations of their rights (80 over the five year period). Staff 20 fair housing information booths at community festivals and annual events (100 over the five year period). Conduct eight (8) fair housing special media efforts per year (40 over the five year period). Host three (3) fair housing special events per year (15 over the five year period).</p>	<p>CDC</p>
<p>Promote understanding and knowledge of fair housing and ADA laws (continued)</p>	<p>Lack of on-line fair housing material to distribute information</p>	<p>Disparities in Access to Opportunity</p>	<p>Annually review content of on-line referral services and verify that content is adequate. This includes websites for all participating jurisdictions. Ensure all websites that fall under the Los Angeles Urban County provide adequate information on federal and state fair housing requirements.</p>	<p>CDC Participating Cities</p>
	<p>Access to financial services</p>	<p>Segregation R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs</p>	<p>Conduct outreach and education on fair lending and what constitutes discriminatory lending, annually. Conduct one (1) outreach and educational presentation per year to private lenders (5 over the five year period). Also, use media, mailings, and other methods to enhance outreach and education.</p>	<p>CDC</p>

Discussion: Consistent with previous Analysis of Impediments to Fair Housing Choice, the Los Angeles County Service Area continues to have challenges in its fair housing arena, per community input, HUD data, and local data. One of the most troubling are the persistence if discriminatory actions taken in the marketplace, primarily by private landlords and lenders. Further complicating this are the lack of knowledge and understanding of fair housing and ADA laws by both consumers and providers of housing.

Promoting understand and knowledge of fair housing and ADA laws are measureable metric designed to impact contributing factors that impact disparities in access to opportunity, segregation, and disproportionate housing needs. These action, including outreach and review, are designed to address disparities in access to financial services, lack of information, and discrimination in the private marketplace.

Fair Housing Goal	Impediments/ Contributing Factors	Fair Housing Issue	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
<p>Coordinate the AI with other agencies' plans and programs to address contributing factors</p>	<p>Lack of coordination with other Planning Processes and Programs to address contributing factors</p>	<p>Segregation R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs</p>	<p>Coordinate the AI with other Agencies to address Contributing Factors that are in their area of influence In Year 1, identify the agencies and their plans and funding, if any, that could address the contributing factors that are low priorities for the CDC due to them not being core functions of the agency. Provide those agencies with the contributing factors and determine if there is a need not being addressed or planned to be addressed with their plans or programs. In Year 2, explore if an unmet need can be addressed as an eligible activity under either the CDBG or HOME program. Also, determine if AI actions can be coordinated with other agency plans and programs to address the unmet needs. Throughout the five year period, progress will be tracked in the Annual Action Plans.</p>	<p>CDC</p>

Discussion: There were several concerns through the community participation and consultation process that there is a lack of coordination in providing services in general. The CDC has determined that some contributing factors are low priorities due to them being core functions of other agencies such as the Metropolitan Transportation Authority or METRO for short or the Department of Public Health. The CDC is committed to inform these agencies of the identified contributing factors and determine if they are either addressing them, plan to address them, or if there are any unmet needs that may be filled with limited Federal funding available to the CDC. Also, determine of AI actions can be coordinated with other agency plans and programs. A matrix will be developed and progress will be tracked and made available in the Consolidated Plan and Annual Action Plans.

Coordination with outside agency plans and programs is an effort to address the lack of coordination with other planning process. These efforts will help combine forces to close the gap in disparities in access to opportunities, R/ECAPs. Segregation, and disproportionate housing needs.

Fair Housing Goal	Impediments/ Contributing Factors	Fair Housing Issue	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Promote lower rates of crime in R/ECAP areas	Public safety concerns	R/ECAPs	Homeowners Fraud Prevention. This program will serve 20 low-income homeowners per year from being victims of fraud in the purchase of a home, equity transactions including identity theft; and in the purchase of household goods and services. Serve 100 total homeowners over the five year period. R/ECAPS targeted include Athens/Westmont, Florence/Firestone, Lennox, and Willowbrook.	CDC
			Drug Prevention and Gang Intervention Program. Assist 220 youth per year with diversion activities such as recreational and educational activities. Serve 1,100 youth over the five year period. R/ECAPs targeted include Florence/Firestone and Lennox.	CDC
			Graffiti Removal Program in the City of Bell. Assist 33,690 people per year. Assist 168,450 people over the five year period.	CDC City of Bell
<p>Discussion: Public safety and anti-crime activities are in significant demand, as noted in several of the Community Meetings, particularly those held in R/ECAP areas, as well as crime statistics reported by the LA County Sheriff and HUD data. There were additional concerns related to hate crime research, particularly towards Muslims and gay communities. CDC efforts to promote lower crime rates are imperative to addressing public safety concerns that are factors in disparities in access to opportunities.</p>				

Fair Housing Goal	Impediments/ Contributing Factors	Fair Housing Issue	Metrics, Milestones, and Timeframe for Achievement	<u>Investment Type</u>
Enhance Limited English Proficiency services in R/ECAP areas	Lack of LEP services	R/ECAPs Disparities in Access to Opportunity	<p>Enhance LEP outreach to non-English speaking persons annually. In Year 1-2, agencies will be assessed for any need they may have to serve persons with limited English skills.</p> <p>In Year 3-5, the agencies will be supported on an as needed basis with either services or funding to provide needed translation or interpretation services. R/ECAPs targeted include Athens/Westmont, Florence/Firestone, Lennox, Willowbrook, and the City of Bell.</p>	CDC City of Bell
<p>Discussion: During the Focus Groups and identified in the surveys, HUD data, and local data, it was expressed that there is a lack of services in low-income areas to assist persons with limited English proficiency which severely narrowed access to available services.</p> <p>In enhancing Limited English Proficiency services in R/ECAP areas, the CDC and City of Bell, is engaging the lack of LEP services to address disparities in access to opportunities and racial/ethnic concentrated areas of poverty (R/ECAPs).</p>				

The Housing Authority of the County of Los Angeles (HACoLA) has a significantly different set of cities comprising the Housing Authority service area noted in Table I.5 below. It also retains many of the unincorporated communities seen Table I.2 on page 1.

Table I.4
Cities Served by the Housing Authority of the County of Los Angeles

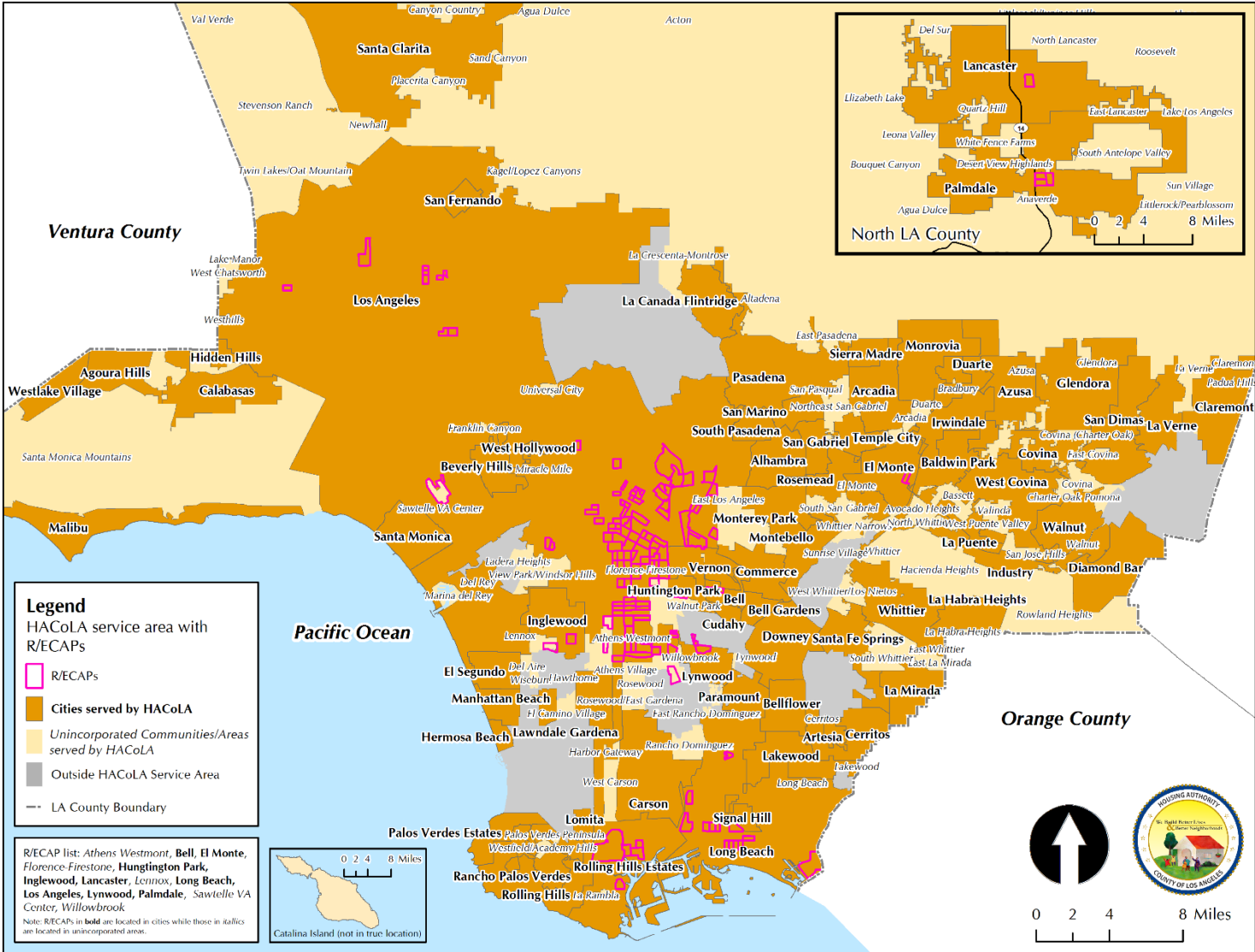
Agoura Hills	Commerce	La Canada Flintridge	Montebello	Santa Monica
Alhambra	Covina	La Habra Heights	Monterey Park	Sierra Madre
Arcadia	Cudahy	La Mirada	Palmdale	Signal Hill
Artesia	Diamond Bar	La Puente	Palos Verdes Estates	South El Monte
Avalon (Catalina Island)	Downey	La Verne	Paramount	South Pasadena
Azusa	Duarte	Lakewood	Pasadena	Temple City
Baldwin Park	El Monte	Lancaster	Rancho Palos Verdes	Vernon
Bell	El Segundo	Lawndale	Rolling Hills	Walnut
Bell Gardens	Gardena	Lomita	Rolling Hills Estates	West Covina
Bellflower	Glendora	Long Beach	Rosemead	West Hollywood
Beverly Hills	Hermosa Beach	Los Angeles	San Dimas	Westlake Village
Bradbury	Hidden Hills	Lynwood	San Fernando	Whittier
Calabasas	Huntington Park	Malibu	San Gabriel	
Carson	Industry	Manhattan Beach	San Marino	
Cerritos	Inglewood	Maywood	Santa Clarita	
Claremont	Irwindale	Monrovia	Santa Fe Springs	

Map I.2, presented on the following page, shows the service area for cities and unincorporated communities served by Housing Authority's 68 properties, public housing program locations, and locations of the Section 8 Vouchers. The R/ECAPs are presented in this map as well, indicating that a substantive set of R/ECAP areas exist in the HACoLA service area.

Following this map, Table I.6 shows R/ECAPs for the Housing Authority and Table I.4 B, following directly after, presents the fair housing goals, issues, and proposed achievements as they pertain to the HACoLA service area.

Finally, Map I.3 on page 45 shows the combined service area for the Urban County and HACoLA, with cities in dark orange and unincorporated areas in light tan.

**Map I.2
Housing Authority of the County of Los Angeles Service Area**



Data Sources: HUD AFFH, County of Los Angeles, USGS, Census Tigerline, Esri

**Table I.5
Housing Authority Census Tracts Designated as
Racial or Ethnically Concentrated Areas of Poverty (R/ECAPs)**

Community Name	Census Tract Number
Athens-Westmont	06037600100
	06037600303
Bell	06037533601
El Monte	06037433305
Florence-Firestone	06037532800
Huntington Park	06037533103
	06037533104
Inglewood	06037600602
Lancaster	06037900806
Lennox	06037601700
Long Beach	06037572800
	06037571600
	06037576401
	06037573300
	06037980007
	06037576402
	06037575102
	06037572500
	06037573002
	06037573003
	06037573004
	06037576302
	06037576403
Los Angeles	06037980015
	06037232120
	06037203100
	06037117408
	06037117407
	06037221900
	06037229200
	06037228800
	06037231710
	06037238320
	06037228210
	06037228100
	06037228420
	06037221810
	06037207102
	06037231800
	06037206050
	06037242100
	06037236204
	06037128210
	06037209104
	06037240200
	06037240500
	06037227020
	06037208720
	06037224420
	06037128303
	06037209820
	06037239602
	06037241110
	06037238310
	06037236202
06037243100	
06037241120	
06037226700	
06037199700	
06037208904	
06037209300	

Los Angeles (continued)	06037205120
	06037204910
	06037294900
	06037296210
	06037206010
	06037207400
	06037206300
	06037294820
	06037226420
	06037221302
	06037224010
	06037222700
	06037224410
	06037212202
	06037199120
	06037221303
	06037204420
	06037980010
	06037241300
	06037205110
	06037206200
	06037134305
	06037228710
	06037229300
	06037224320
	06037120103
	06037221710
	06037221820
	06037222600
	06037294830
	06037117405
	06037231900
	06037232110
	06037190801
	06037228600
	06037228900
	06037229410
	06037231100
	06037231220
	06037239502
	06037239701
	06037239801
	06037240010
	06037237102
	06037237720
06037239201	
06037207101	
06037204410	
06037240800	
06037241001	
06037242600	
06037115103	
06037226410	
06037209403	
06037209810	
06037120107	
06037224600	
06037227010	
06037228220	
06037192700	
06037221500	
06037265303	
06037208902	
06037209102	
06037209103	
06037239601	

Lynwood	06037540202
	06037540201
Palmdale	06037910402
	06037910403
	06037910501
Sawtelle VA Center	06037701100
Willowbrook	06037541400

Table I.4.B
County of Los Angeles: Analysis of Impediments to Fair Housing Choice/ Assessment of Fair Housing
Fair Housing Goals, Issues, and Proposed Achievements: HACoLA Service Area

Fair Housing Goal	Impediments/ Contributing Factors	Fair Housing Issue	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Promote lower rates of crime	Public safety concerns	R/ECAPs Disproportionate Housing Needs	<ol style="list-style-type: none"> 1. Annually engage and enhance the community policing team (CPT) program at HACoLA sites. 2. The CPTs meet quarterly and ascertains the crime prevention needs of the housing sites. 15 meetings will be held in the next 5 years. 3. CPTs hold monthly Task Force by 2 service areas with the respective Area Manager to monitor progress in crime prevention and addressing public safety concerns. Approximately 120 meetings will be held in the next 5 years. 	HACoLA Los Angeles County Sheriff's Department The Long Beach Police Department
	Violent and drug related crime in public housing	R/ECAPs	<ol style="list-style-type: none"> 1. Enhance crime reduction programs and the Crime Prevention Unit annually. 2. Convene quarterly meetings and report statistics on progress in keeping sites safe. Approximately 15 meetings will be held in the next 5 years. 	HACoLA
	Minority and low-income communities experience higher rates of crime and violence	Segregation Disparities in Access to Opportunity	<ol style="list-style-type: none"> 1. Annually provide training and/or technical assistance to law enforcement agencies, County and/or City departments, and other housing authorities annually. 	HACoLA
	Criminal activity in public housing facilities	R/ECAPS Disparities in Access to Opportunity	<ol style="list-style-type: none"> 1. Annually improve Crime Prevention Through Environmental Design (CPTED) measures currently in place at HACoLA including additional installation of CCTV systems. 2. Convene quarterly meetings with the CPT and CPTED staff to monitor progress and report on accomplishments quarterly. Approximately 15 meetings will be held in the next 5 years. 3. Annually enhance security measures as needed at public housing facilities including installation of additional CCTV systems and CPT. 4. Review security contracts annually. 	HACoLA
	Juvenile crime activity	R/ECAPs Segregation	<ol style="list-style-type: none"> 1. Enhance and continue Juvenile Justice Crime Prevention Act (JJCPA) activities annually. 2. Convene meetings to monitor progress and report on accomplishments quarterly. Approximately 15 meetings will be held in the next 5 years. 	HACoLA

Discussion: Fair Housing Survey data indicated that there is a marked discrepancy in the rate that R/ECAP residents feel safe in their neighborhoods compared to the Urban County at-large. Public safety and anti-crime activities are in significant demand, as noted in several of the Community Meetings, particularly those held in R/ECAP areas, as well as crime statistics reported by the LA County Sheriff and HUD data. Additional research points to the troubling presence of hate crimes in LA County. Many people wanted to know where the sheriff was during the Community Meetings, wishing that their voices were heard by the sheriff. Transcripts of those hearings have been prepared and submitted to the Sheriff. People also addressed the notion that there was little done to respond to their concerns in the past.

The Goal to promote lower rates of crime is established to address the disparities in access to opportunity in R/ECAPs. Through the actions presented with this goal, HACoLA will seek to reduce the disparities in access to opportunity through increased community involvement, continues crime prevention programs, technical assistance and monitoring. These efforts are a part of HACoLA’s efforts to increase access to healthy neighborhoods.

Fair Housing Goal	Impediments/ Contributing Factors	Fair Housing Issue	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
<p>Enhance accessible housing and supportive services to persons with disabilities</p>	<p>Increase independence for the elderly or families with disabilities</p>	<p>Disparities in Access to Opportunity Disproportionate Housing Needs</p>	<ol style="list-style-type: none"> 1. Apply for additional Resident Opportunity and Self Sufficiency (ROSS) grants annually. 2. Implement the assisted living waiver program (ALWP) as state funding permits at additional senior sites. Currently the ALWP has been implemented at South Bay Gardens, Orchard Arms, and Lancaster Homes housing developments. Monitor progress and report annually. 3. Provide reasonable accommodations/reasonable modifications through HACoLA’s Reasonable Accommodation/Reasonable Modifications request procedures. Monitor progress and report annually. 4. Ensure that funded projects fully comply with federal and state fair housing requirements. 5. Conduct mobility workshops with various partnering agencies for residents (ex: fall prevention, alert systems) annually. Keep record of workshops. 6. Improve the implementation of current review and approval of reasonable accommodations practices and track all ADA requests annually. 	<p>HACoLA</p>
	<p>Lack of sufficient accessible housing in a range of unit sizes</p>	<p>Disparities in Access to Opportunity</p>	<ol style="list-style-type: none"> 1. Promote conversion activities to benefit a minimum of 1,300 units annually to include additional accessibility features of existing accessible units in a range of sizes for persons with disabilities annually as funding permits. Conversion/rehabilitation activities to benefit a minimum of 6,500 units in the next 5 years. Monitor progress and report annually. Accessible units comply with Section 504 and ADA requirements for accessible design as well as the federal Fair Housing Act requirements, if applicable. 	<p>HACoLA</p>

<p>Enhance accessible housing and supportive services to persons with disabilities (Continued)</p>	<p>People with disabilities becoming homeless</p>	<p>Disparities in Access to Opportunity Disproportionate Housing Needs</p>	<p>1. Partner with other County agencies to identify housing prior to a resident or applicant becoming homeless and make referrals annually.</p>	<p>HACoLA</p>
	<p>Barriers to mobility</p>	<p>Segregation Disparities in Access to Opportunity</p>	<p>1. Utilize the Green Physical Needs Assessment (GPNA) annually to address barriers to mobility annually as funding permits.</p>	<p>HACoLA</p>
	<p>Lack of mental health services for school age children of public housing</p>	<p>Disparities in Access to Opportunity</p>	<p>1. Connect residents with resources including Department of Mental Health case management services and on-site HACoLA case managers. Provide services to 100 residents annually.</p>	<p>HACoLA Department of Mental Health of Los Angeles County</p>
	<p>Access to transportation</p>	<p>Segregation Disparities in Access to Opportunity Disproportionate Housing Needs</p>	<p>1. Provide transportation to Resident Advisory Board (RAB) meetings, field trips and other events as funding permits. 2. HACoLA will inform residents of resources and options for transportation on the HACoLA website and the resident LINK newsletter. Information will be updated annually as needed.</p>	<p>HACoLA</p>
<p>Discussion: Data from the Fair Housing survey, input from the Disability Rights Center, as well as local input has indicated a lack of housing and supportive service options for persons with disabilities. The provision of housing and housing related services to persons with disabilities has been a significant issue, as reported from the Disability and Access Focus Group, as well as during Community Meetings, and Resident Advisory Board Meetings. There is not a sufficient number of affordable accessible housing units available, per community input and HUD and local data. Both the CDC and the HACoLA will devote additional resources to this need.</p> <p>The metrics and milestones presented to enhance accessible housing and supportive services seek to reduce the disparities in access to opportunity and housing discrimination for persons with disabilities. Through creating additional housing options and connection to new and existing services, HACoLA is encouraging access to opportunity and decreasing the disparate access to services.</p>				

Fair Housing Goal	Impediments/ Contributing Factors	Fair H Issue	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Create viable communities	Access to affordable internet	Disparities in Access to Opportunity	<ol style="list-style-type: none"> 1. Annually expand cable/internet access to housing development sites, as funding permits. The Housing Authority currently has cable/internet access at three (3) housing developments: Carmelitos, Whittier Manor, and Herbert. 2. Annually enhance and continue to provide computer/internet access at HACoLA's largest sites in the Family Learning Centers at Nueva Maravilla, Harbor Hills and Carmelitos. 3. When providing Project-Based Voucher funding to developers that Construct or Rehabilitate Affordable Housing Developments, continue to require annually, as mandated by the Federal Communications Commission and the U.S. Department of Housing and Urban Development, Broadband Infrastructures that permits residents to acquire low cost internet services. 	HACoLA
<p>Discussion: Access to internet is disproportionate for low-income households, resulting in disparate access to educational and employment opportunities. The desire to enhance as well as create viable communities throughout the LA County Service Area is a strong desire by many throughout the service area. Part of this is due to the lack of Community Reinvestment Act investments in lower income areas (per CRA data analysis), lack of mortgage lending in lower income areas and with racial and ethnic minorities (per HMDA data analysis). As well, public investments for such things as public parks, recreation centers and other public facilities is felt to be less in R/ECAP areas, as evidenced by the community input process of the AI.</p>				

Fair Housing Goal	Impediments/ Contributing Factors	Fair Housing Issue	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Promote healthy communities	Industries not in compliance with health regulations Pollution in Neighborhoods Illegal Dumping Proximity to environmental hazards, especially in communities of color	R/ECAPs Disparities in Access to Opportunity	<ol style="list-style-type: none"> 1. Facilitate environmental review process and adhere to state requirements and procedures. 2. Refer residents to responsible agencies as needed and include information on HACoLA website as appropriate. 	HACoLA
	Food insecurity Access to healthy and nutritious food options	R/ECAPs Disparities in Access to Opportunity	<ol style="list-style-type: none"> 1. Promote access to food assistance programs like CalFresh and Women, Infants, and Children (WIC) through the HACoLA LINK Newsletter and on the HACoLA website annually. 2. Enhance the Growing Experience Program annually to provide fresh produce at a low cost to residents and the local Long Beach community. 	HACoLA
	Enhance adequacy of life skills (e.g. Housekeeping, healthy eating, financial management)	Disparities in Access to Opportunity	<ol style="list-style-type: none"> 1. Provide training seminars to residents through partnerships with outside agencies on life skills at the quarterly Resident Council Forum meetings and/or on-site resident meetings. Approximately 8 training seminars will be held in the next 5 years. 	HACoLA
	Enhance air quality within housing development sites	R/ECAPs Disparities in Access to Opportunity	<ol style="list-style-type: none"> 1. Enforce Smoke-Free policy annually in all developments (except South Bay Gardens where smoking is permitted in a specified open area that is at least 25 feet away from a Housing Authority building that is clearly labeled "Smoking Designated Area"). Ensure that all residents, guests, visitors, vendors, contractors, and staff are in compliance with policy. Implemented smoke-free policy effective July 1, 2014. 	HACoLA
<p>Discussion: The R/ECAP areas throughout the LA Service Area tend to have substantive public health issues. Whether that is through pollution, toxic emissions or other environmental hazards, it remains important to educate our clientele about the risks of such exposures. These exposures have come to light from extensive research of HUD and local data regarding healthy communities, explored in greater detail in Section IV. Furthermore, we must recognize our past role through planning and zoning that may have contributed to this problem. Hence, we need to review the local planning and zoning issues for those areas that are in or near the R/ECAPs. Furthermore, to assist in making access to health food choices easier, we must take the initiative and conduct outreach to the community and resolve our food deserts and increase access to healthy foods.</p> <p>HACoLA actions to address these contributing factors are designed to address disparities in access to opportunities and impact R/ECAPs. Through the use of environmental review, increased access to food options, training and enforcement, HACoLA will help to increase access to healthy neighborhoods and diminish disparities in access to opportunity.</p>				

Fair Housing Goal	Impediments/ Contributing Factors	Fair Housing Issue	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
<p>Promote more affordable and accessible housing</p>	<p>Instances of absentee/bad landlords</p>	<p>Disparities in Access to Opportunity Disproportionate Housing Needs</p>	<p>1. Continue to outreach and provide owner education workshops annually regarding subsidized rental programs, as well as tenant/landlord California laws. 2. Continue to enforce HUD regulations annually regarding owner suitability.</p>	<p>HACoLA</p>
	<p>Lack of opportunities for residents to obtain housing in higher opportunity areas</p>	<p>R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs</p>	<p>1. Enhance and continue resident services programs for all residents, including specialized programs for youth annually. 2. Provide college scholarships through the Community Development Foundation (CDF) annually.</p>	<p>HACoLA</p>
	<p>Enhance place based investments</p>	<p>Disparities in Access to Opportunity</p>	<p>1. Preserve public housing by continuing to address GPNA recommendations annually as funding permits. 2. Apply for available funding opportunities for additional rental assistance vouchers and explore ways to increase housing opportunities for target populations (i.e. Homeless, Special Needs Families) annually.</p>	<p>HACoLA</p>
<p>Discussion: The demand for more affordable and accessible housing comes from many sectors throughout the LA County Service Area as evidenced through the community input process of the AI, as well as analysis of HUD and local data. Whether persons with disabilities, the elderly, people who are transgender, gender non-binary, or gender non-conforming, or racial and ethnic communities, the County needs to have in place additional affordable and accessible housing. It is of particular merit that the location of where these new housing units are constructed, or housing is renovated, should play in the investment decision process. New construction should be directed to higher opportunity areas, with selected renovation in R/ECAP areas.</p> <p>HACoLA's efforts to promote affordable and accessible housing are directed to mitigate the impact of contributing factors to help the fair housing issues facing the Urban County. These efforts, including housing preservation, unit conversion, and education and outreach are aimed at decreasing disparities in access to opportunities, disproportionate housing needs, and R/ECAPs.</p>				

Fair Housing Goal	Impediments/ Contributing Factors	Fair Housing Issue	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
<p>Promote understanding and knowledge of fair housing and ADA laws</p>	<p>Lack of knowledge of Fair Housing, Section 504 and ADA law Disconnect in matching people with disabilities with the right housing resources</p>	<p>Disparities in Access to Opportunity</p>	<ol style="list-style-type: none"> 1. Conduct ADA and Fair Housing training for all new employees annually. Training will include information on FHA, Section 504, Title II of the ADA and the California Fair Employment and Housing Act (FEHA). 2. HACoLA provides a family that is disabled and requires specific accessible features, priority for vacant accessible units annually. HACoLA offers a vacant accessible unit first to current units and then to an eligible qualified applicant that requires the special features of the vacant unit. 3. HACoLA will provide all applicants and residents the "Housing Authority's Process to Request a Reasonable Accommodation and/or Reasonable Modification" Information Form in compliance with FHA, on the HACoLA website and in the application packet annually. 4. Update the listing of accessible public housing units and accessibility features available at each housing development on HACoLA's website annually. 5. HACoLA will continue to require annually a signed Waiver Form from each resident that is housed in a unit with accessible features where the resident does not require a unit with such features. Pursuant to this waiver, a unit with accessible features can be assigned to a resident or applicant that is disabled as the need arises. 	<p>HACoLA</p>
	<p>Discrimination in the private accessible rental markets</p>	<p>Segregation R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs</p>	<ol style="list-style-type: none"> 1. For Section 8 participants, continue to provide mobility counseling at monthly voucher briefing sessions. 2. For Section 8 participants, continue to provide access to enhanced Housing Navigation Resources annually. 3. Continue to provide and review information annually on the Housing Authority website and briefing sessions regarding reporting Housing Discrimination. 	<p>HACoLA</p>
<p>Discussion: Consistent with previous Analysis of Impediments to Fair Housing Choice, the Los Angeles County Service Area continues to have challenges in its fair housing arena. One of the most troubling is the persistence of discriminatory actions taken in the marketplace, primarily by private landlords and lenders (as evidenced by community input received from the 2017 Resident Fair Housing Survey). Further complicating this are the lack of knowledge and understanding of fair housing and ADA laws by both consumers and providers of housing.</p> <p>The promotion of fair housing understanding and knowledge are critical to ensuring households are able to have more equitable access to housing and services. These efforts to address discrimination and lack of knowledge and resources are combined to shorten the gap in access to opportunity and disproportionate housing needs.</p>				

Fair Housing Goal	Impediments/ Contributing Factors	Fair Housing Issue	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Enhance employment opportunities	Disparities in job readiness and educational achievement	R/ECAPs Disparities in Access to Opportunity	1. Conduct job readiness training for 50 public housing residents annually. Partner with Workforce Development, Aging, and Community Services (WDACS) to enhance collaboration on existing program efforts as well as design new initiatives for workforce readiness and employment opportunities.	HACoLA WDACS
<p>Discussion: One of the keys to empowerment is the ability to secure gainful employment, particularly that which pays a reasonable and livable wage. The CDC and the HACoLA are committed to assisting households in the LA County Service Area to secure this type of employment opportunity, either through job training, retraining, recruitment, and job retention. HUD data and maps showing the Labor Market Engagement Index show areas for improvement in engaging in the workforce for low-income areas and R/ECAPs (see Section IV of this report for further detail).</p> <p>Enhancing employment opportunities will help to combat the disparities in job readiness and educational achievement. These efforts are designed to address the disparities in opportunities in R/ECAPs and for low-income households.</p>				

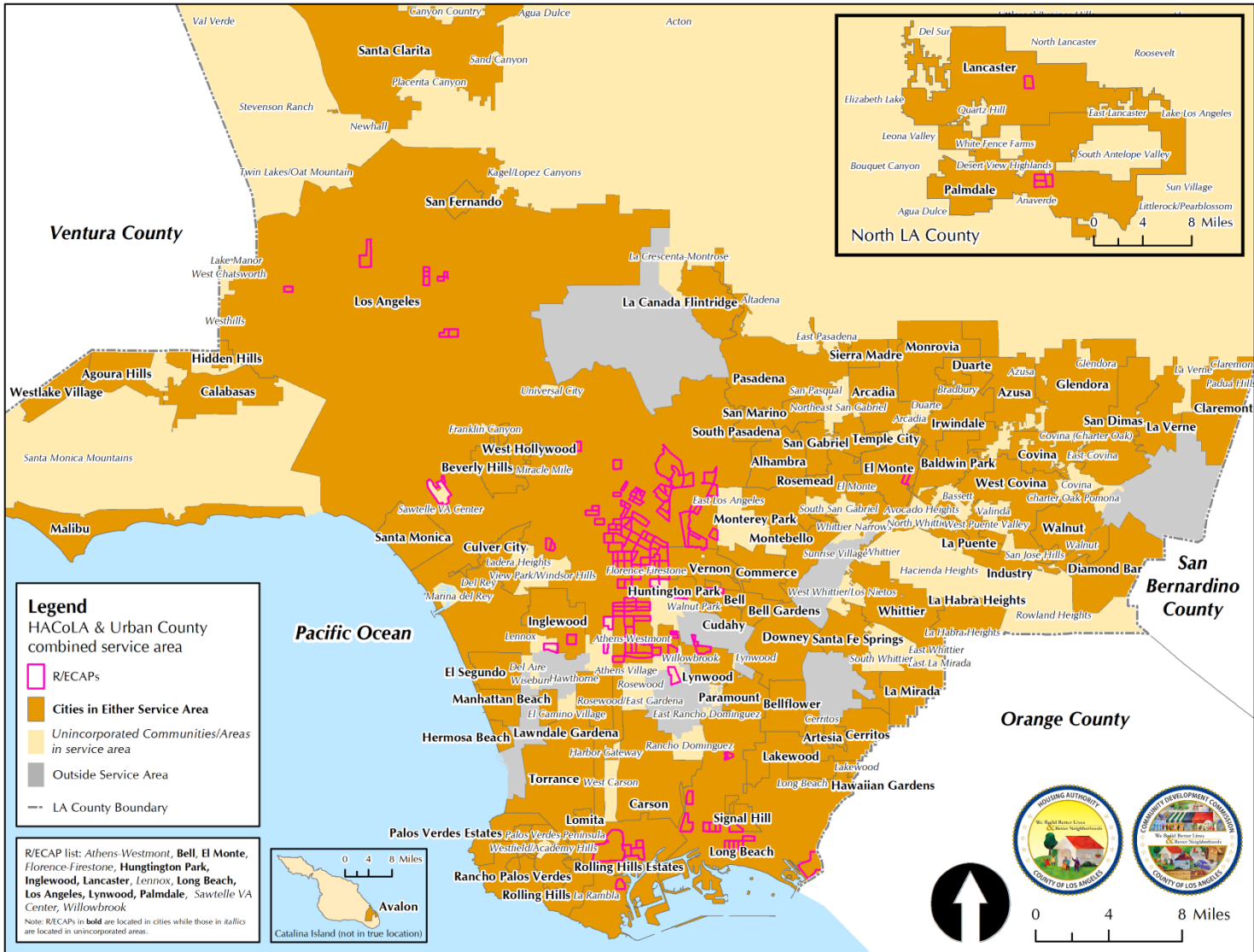
Fair Housing Goal	Impediments/ Contributing Factors	Fair Housing Issue	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Facilitate access to proficient schools	Enhance place based investments	Disparities in Access to Opportunity	<ol style="list-style-type: none"> 1. Continue and enhance resident services programs annually for all residents, including specialized programs for youth. 2. Provide college scholarships through the CDF, annually. 3. Provide computer classes/labs, afterschool programs for youth, financial literacy, nutrition workshops, and enrichment activities at the HACoLA Family Learning Centers (FLC) annually. 4. Continue to convene the CDF Reality Check Conference annually where HACoLA youth are provided with scholarships, educational seminars, and skill development to assist them in achieving their goals. 	HACoLA
	Availability of scholarships	Disparities in Access to Opportunity	<ol style="list-style-type: none"> 1. Continue to provide scholarships for residents as funding permits through the CDF annually. 	HACoLA
<p>Discussion: A key issue to ensuring that future generations can ascend the ladder to greater economic opportunity is the ability to have access to a good education. In many areas of the Los Angeles County service area, this remains a challenge. However, several issues related to substantive concerns for communities of color, as well as those in lower income neighborhoods, remain to be worked on, as noted above. HUD-provided data and maps show the School Proficiency Index as low-scoring in low-income and R/ECAP areas (see Section IV of this report for further detail).</p> <p>Facilitating access to proficient schools will help mitigate the lack of availability of scholarships and enhance place based investments. The culmination of these efforts are in place to reduce disparities in access to opportunities for impacted households and create more equity in access to proficient schools.</p>				

Fair Housing Goal	Impediments/ Contributing Factors	Fair Housing Issue	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
<p>Promote facilities and services for the homeless</p>	<p>Enhance programs to help at-risk homeless population</p>	<p>R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs</p>	<ol style="list-style-type: none"> 1. Continue to receive referrals annually from Los Angeles Homeless Services Authority (LAHSA) to house homeless families and provide case management for these families to remain housed. 2. As funding and regulatory requirements permit, continue to commit annually through a competitive Notice of Funding Availability, Project-Based Vouchers, to developers that target affordable housing development that will house special needs populations, such as at-risk of homeless and/or homeless populations. 3. Include requirements in NOFA funding agreements that projects must incorporate affirmative marketing, tenant selection, and reasonable accommodation/reasonable modification practices that fully comply with Section 504, Title II of the ADA, FHA and FEHA. 4. Prioritize rapid rehousing and provide ancillary services annually through LAHSA coordinated with CDC and HACoLA. 5. Utilize Measure H Funding annually, continue to evaluate and expand the Homeless Incentive Program, to entice landlords to rent available rental units to the homeless and homeless veterans. 	<p>HACoLA LAHSA</p>
<p>Discussion: The number of persons who are homeless in the Los Angeles County Service area has continued to expand over the years and was a topic discussed in the community input process of the AI. It is a significant challenge due to the both housing and special needs services required of this sub-population. Still the LAHSA has the capacity and capability to address these challenges. The CDC and the HACoLA are committed to working with the LAHSA to ensure that these populations are addressed in a consistent and constant method and fashion.</p> <p>Promoting facilities and services for the homeless is an effort to combat the continuing rise of homelessness and addressing the needs of at-risk households. This goal is aimed at addressing disproportionate housing needs and disproportionate access to opportunity.</p>				

Fair Housing Goal	Impediments/ Contributing Factors	Fair Housing Issue	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Enhance transit services	Access to transportation	Disparities in Access to Opportunity	1. Provide transportation to Resident Advisory Board (RAB) meetings, field trips and other events as funding permits. 2. HACoLA will inform residents of resources and options for transportation on the HACoLA website and the resident LINK newsletter. Information will be updated annually as needed. 3. Provide homeless families with a voucher, transit services to locate available units.	HACoLA
<p>Discussion: Enhancing the public travel experience is another key aspect for householders, particular those residing in the R/ECAPs to secure enhanced public transit and be able to get to the jobs. The community input process was critical in understanding the importance of this goal, and analysis of HUD and local data confirms this.</p> <p>Enhancing transit services through increased access to information is an effort to mitigate the impacts on inequitable access to transportation for parents and children, and the lack of availability of bus passes. As seen in the Contributing Factors tables, those who utilize bus services have little other options are primarily low-income households. Increasing access to transit services will decrease disparities in access to opportunities for low income households.</p>				

Fair Housing Goal	Impediments/ Contributing Factors	Fair Housing Issue	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Other fair housing goals	Lack of resources and services for working families (e.g., helping find housing for minorities)	Disparities in Access to Opportunity	<ol style="list-style-type: none"> 1. Enhance and continue resident services programs for all residents, including specialized programs for youth annually. 2. Provide information regarding the Los Angeles County Resource Center through the HACoLA website. 3. Continue to provide college scholarships through the CDF as funding permits, annually. 4. Provide computer classes/labs, afterschool programs for youth, financial literacy, nutrition workshops, and enrichment activities at the HACoLA Family Learning Centers (FLCs). HACoLA will provide services to approximately 200 residents annually. 5. Conduct outreach to parents with Limited English Proficiency and computer access annually. 	HACoLA
	Access to affordable childcare	Disparities in Access to Opportunity	<ol style="list-style-type: none"> 1. Continue to refer residents annually to child care centers that provide services to low income families. HACoLA has child care centers in Harbor Hills, Nueva Maravilla, and off-site childcare centers through the Long Beach Head Start program and at the Bright Futures Child Development Center in South Los Angeles. 	HACoLA
<p>Discussion: There are several other concerns that we must consider in evaluation fair housing issues for the Los Angeles County Service area, brought to light through the community involvement process and analysis of HUD and local data. While these do not necessary fit well into any other category it in no way lessens their significant importance to promoting the economic vitality of the County.</p> <p>These other fair housing goals present opportunities for action for HACoLA to address disparities in access to opportunities.</p>				

**Map I.3
Los Angeles County Service Area**



Data Sources: County of Los Angeles, Census Tigerline, Esri

PURPOSE AND PROCESS

The AFFH rule requires fair housing planning and describes the required elements of the fair housing planning process. The first step in the planning process is completing the fair housing analysis required in the AI. The rule establishes specific requirements program participants must follow for developing and submitting an AI and for incorporating and implementing that AI into subsequent Consolidated Plans and Public Housing Agency (PHA) Plans. This process is intended help to connect housing and community development policy and investment planning with meaningful actions that affirmatively further fair housing.²⁷

The new approach put in place by this rule is designed to improve program participants' fair housing planning processes by providing data and greater clarity to the steps that program participants must take to assess fair housing issues and contributing factors, set fair housing priorities and goals to overcome them, and, ultimately, take meaningful actions to affirmatively further fair housing. A goal of the AFFH rule is to make sure states and insular areas, local communities, and PHAs understand their responsibilities in the area of fair housing planning. As HUD works to foster effective fair housing planning, goal setting, strategies, and actions, it recognizes that the people who are most familiar with fair housing issues in cities, counties, and states are the people who live there and deal with these issues on a daily basis.

Local governments, PHAs, States, and Insular Areas must be involved in fair housing planning to ensure follow through on the obligation to affirmatively further the policies of the Fair Housing Act. These policies include the policy of ensuring that persons are not denied equal opportunities in connection with housing because of their race, color, national origin, religion, disability, sex, or familial status. They also include the policy of overcoming patterns of segregation and the denial of access to opportunity that are part of this nation's history. To be effective, fair housing planning must tackle tough issues. Fair housing planning affects the community as a whole, so all people in the community must have the opportunity to be at the table and participate in making those decisions.

The AFFH rule recognizes that local governments, PHAs, States, and Insular Areas have the responsibility to identify the nature and extent of barriers to fair housing and set goals for what can and should be done to address them. For this reason, the AFFH rule makes community participation an important part of the development of the AI and subsequent planning to help ensure the integrity and, ultimately, the success of program participants' efforts to affirmatively furthering fair housing. In other words, subject to review by HUD, local governments, PHAs, States, and Insular Areas will identify the fair housing issues affecting their geographic area, develop planned solutions, and be accountable for resolving the problems using the solutions that they adopt.²⁸

The introduction of the HUD's Assessment of Fair Housing tool (Assessment Tool) requires jurisdictions to submit their Fair Housing Assessments through an online User Interface. While this document is not that submittal, the Assessment Tool provides the organizational layout of this document.

²⁷ <https://www.hudexchange.info/resources/documents/AFFH-Rule-Guidebook.pdf>

²⁸ Affirmatively Furthering Fair Housing Rule Guidebook, Version 1, December 31, 2015, the U.S. Department of Housing and Urban Development, preface.

AI METHODOLOGY

This AI was conducted through the assessment of a number of quantitative and qualitative sources. Quantitative sources used in analyzing fair housing choice in Los Angeles County included:

- Socio-economic and housing data from the U.S. Census Bureau, such as the 2010 Census and the 2011-2015 American Community Survey;
- The 2017 HUD AFFH Database, which includes PHA data, disability information, and geographic distribution of topics;
- Housing complaint data from HUD;
- Home loan application data from the Home Mortgage Disclosure Act;
- Small business loans from the Community Reinvestment Act;
- Quarterly progress report data from the Housing Rights Center; and
- A variety of local data.

Qualitative research included evaluation of relevant existing fair housing research and fair housing legal cases. Additionally, this research included the evaluation of information gathered from many public input opportunities conducted in relation to this AI, including the 2017 Fair Housing Survey, a series of fair housing forums, workshops, and presentations, the public review and related review workgroups.

As a result of detailed demographic, economic, and housing analysis, along with a range of activities designed to foster public involvement and feedback, the program participant has identified a series of fair housing issues, and factors that contribute to the creation or persistence of those issues. The issues that the collaborating agencies have studied relate to racially and ethnically concentrated poverty, segregation and integration of racial and ethnic minorities, disproportionate housing needs; publicly supported housing location and occupancy; disparities in access to opportunity; disability and access; and fair housing enforcement, outreach, capacity, and resources.

The AI development process will conclude with a forty five-day public review period of the draft AI. The final document will remain on file with the CDC and HACoLA.

AREAS OF OPPORTUNITY

As a guide to aiding resource investments in the County, the research team developed single composite index representing a rating of Census tracts, which factors in variables concerning education, job and labor markets, housing, transportation, and environmental health. Those areas scoring a high index represent the areas with the greatest opportunity. These are physical places having desirable attributes, such as high-performing schools, availability of well-paying jobs, and clean air quality, among others. Areas with a low index represent areas with low opportunity, and are heavily populated with R/ECAP areas. The index is designed to better understand what an “area of opportunity” represents and what disparities in opportunity mean. Investments can be either place-based or to enhance mobility, but the opportunity index score aids in helping us to better include an evaluation of equity and the distribution and access to opportunity within the larger community. In developing this index, HUD-provided data as well as local data have been incorporated as part of the methodology.

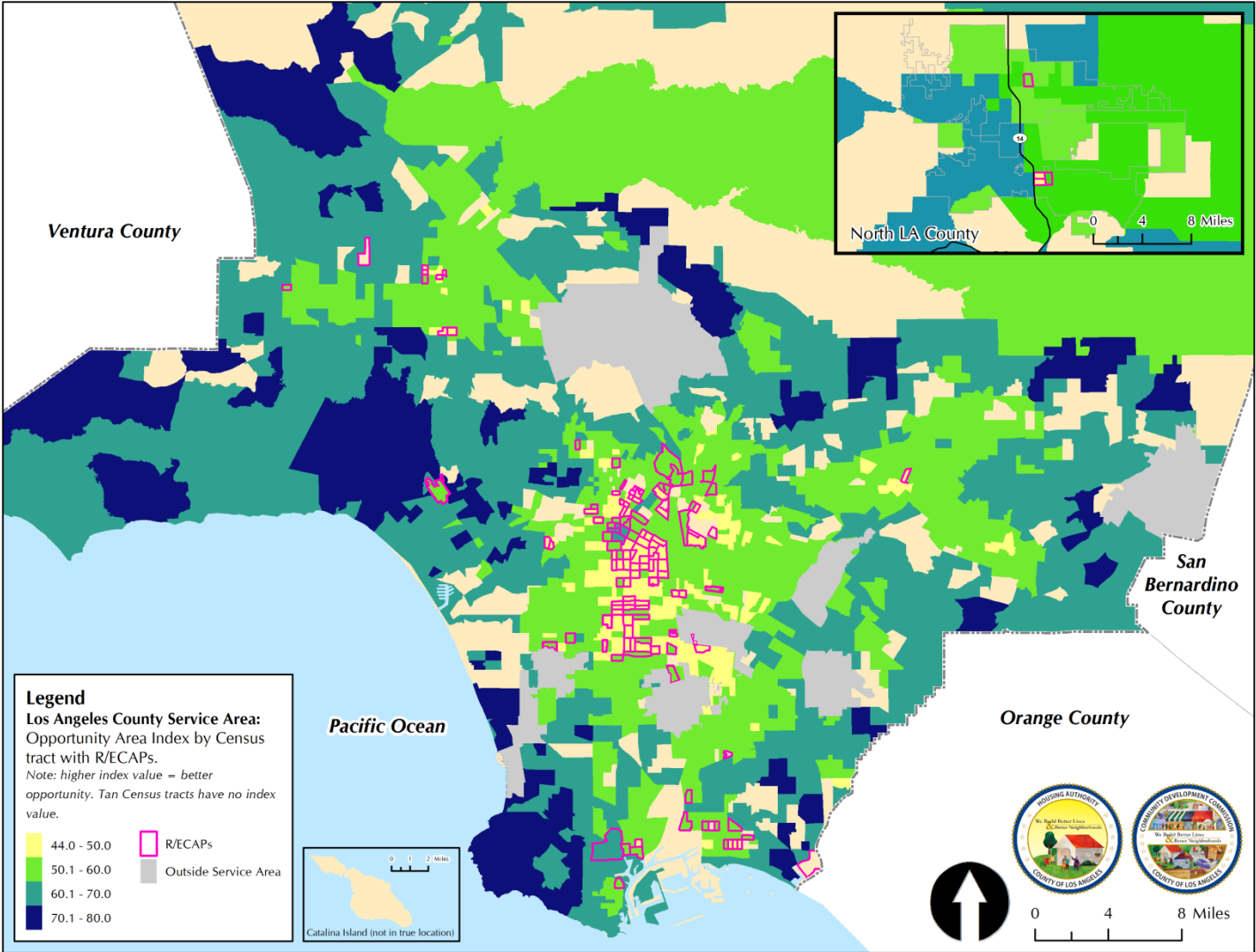
Variables in each of the five categories (Education, Economic, Housing, Transportation, and Health) were given equal weighting. The five categories were then compiled into one “master” opportunity index value, weighted such: 35 percent weight each to Education and Housing, 15 percent weight Economic, 10 percent weight to Transportation, and 5 percent weight to Health. Table I.7 below shows the factors incorporated in the development of this index.

Table I.6
Factors Considered in Areas of Opportunity
 HUD Data, Census Database, Local Data

Education	Economic	Housing	Transportation	Health
School Proficiency Index	Job Proximity Index	Percent Occupied Housing Units	Transit Trips Index	Environmental Health Index
Percent of Persons Enrolled in School	Labor Market Engagement Index	Percent No Cost Burden	Low Transportation Cost Index	
High School Graduation Rate	Employment Rate	Percent No Overcrowding	Percent Walking to Work	
		Percent Non HAL Loans		

The index values are shown below in Map I.4. The lowest opportunity area index values (shown in yellow on the map) are in Central Los Angeles and to the southeast, near Westmont and Lynwood. Census tracts in the highest category of opportunity (those with values from 70.1 to 80 and shown in navy blue), can be found scattered throughout the peripheries of the county with large groupings near Rolling Hills and Rancho Palos Verdes, in the east of the county near Glendora and San Dimas, and near Santa Monica and Malibu. Note that no R/ECAPs are represented in areas with high levels of opportunity (any Census tracts with an opportunity value over 70.1). There are significant levels of opportunity in the moderately high opportunity areas, although three of these also show evidence of R/ECAP areas in downtown Los Angeles.

Map I.4
Opportunity Areas Index
Los Angeles County Service Area
Developed and Compiled by WES



Data Sources: HUD AFFH, County of Los Angeles, Census Tigerline, Esri