

# ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING



Fair Housing Advocacy Committee Meeting #3

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# Fair Housing Complaint Data

# Fair Housing Enforcement and Education Orgs.

## Portland Housing Bureau Contracts

approximate total (\$435,000)

- Fair Housing Council of Oregon (FHCO)
- Legal Aid Services of Oregon (LASO)
- 211
- Community Alliance of Tenants (CAT)

## Other Organizations

- Disability Rights Oregon
- Bureau of Labor and Industry (BOLI)
- Housing and Urban Development (HUD)

# Fair Housing Complaint Data from FHCO

## Protected Class

BASIS	2010/11	2011/12	2012/13	2013/14	2014/15
Race/Color	7	29	10	16	6
National Origin	8	25	2	12	11
Religion	3	0	0	2	0
Sex	4	9	5	5	6
Familial	15	20	5	15	9
Disability	25	44	18	67	75
Domestic Violence	0	0	1	4	3
Sex Orientation/Gender	3	13	3	1	2
Income Source	3	2	1	5	8
Marital Status	1	1	0	0	1
<b>TOTAL</b>	<b>124</b>	<b>143</b>	<b>45</b>	<b>127</b>	<b>121</b>

## Alleged Act

Alleged Act	2010/11	2011/12	2012/13	2013/14	2014/15
Eviction	4	13	14	12	6
Reasonable Accommodation	9	25	14	35	40
Disparate Treatment	0	0	0	8	3
Design/Construction	0	1	4	0	1
Illegal Ad/Statement	5	29	0	0	1
Refusal to Rent	6	20	9	12	16
Refusal To Sell	0	1	1	12	1
Steering	0	0	0	0	1
Harassment	7	35	10	33	14
Terms and Conditions	8	69	28	20	19
Retaliation	0	5	11	5	4
Reasonable Modification	0	0	1	5	0

# Comparing allegations to protected class

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## Most Common Allegation

### Most Common Allegations

- Refusal of Reasonable Accommodations
- Refusal to rent
- Harassment
- Terms and Conditions

## Most impacted Protected Class

### Protected Class in order of number of complaints

- Disability
- National Origin
- Race
- Family
- Income Source
- Sex

# Comparing allegation to protected class

## Legal Aid Services of Oregon 2011-2015

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### Common Protected Class

6. Basis of Complaint	2011-2012	2012-2013	2013-2014	2014-2015	Totals
Race/color	6	5	2	6	19
National Origin	8	5	15	1	29
Family Status	1	2	3	1	7
Religion	0	0	0	0	0
Gender/Sex	0	2	0	3	5
Mental Disability	24	15	15	24	78
Physical Disability	14	18	20	19	71
Marital Status	0	0	0	0	0
Source of Income	0	0	0	1	1
Age	0	0	0	0	0
Sexual Orientation	1	0	0	0	1
Sexual Harassment	1	0	0	1	2
Military Status	0	0	0	0	0
Domestic Violence Status	8	8	10	10	36
OTHER	1	1	1	0	3
<b>TOTAL:</b>	<b>64</b>	<b>56</b>	<b>66</b>	<b>66</b>	<b>252</b>

### Common Allegation

7. Alleged Act	2011-2012	2012-2013	2013-2014	2014-2015	Totals
Admissions	0	1	0	1	2
Refusal to rent	2	1	1	1	5
Eviction	25	29	25	32	111
Reasonable Accommodation	21	15	16	18	70
Disparate Treatment rent	2	0	2	1	5
Design/Construction	1	0	0	0	1
Redlining	0	0	0	0	0
Illegal Ad	0	0	0	0	0
Refusal to Sell	0	0	0	0	0
Refusal to Permit	0	0	0	0	0
Steering	0	1	0	0	1
Disparate treatment credit	0	1	0	0	1
Harassment/ Discriminatory Statements	9	4	4	5	22
OTHER	4	4	18	8	34
<b>TOTAL:</b>	<b>64</b>	<b>56</b>	<b>66</b>	<b>66</b>	<b>252</b>

## Common basis of complaints

- **Protected Class in order of number of complaints**
  - Mental Disability
  - Physical Disability
  - National Origin
  - Race
  - Domestic Violence

## Common Allegation

- **Most Common Allegations**
  - Refusal of Reasonable Accommodations
  - Refusal to rent
  - Harassment
  - Terms and Conditions

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# Fair Housing Testing



# Fair Housing Tests 2013-2015

## Initial tests

Protected Class	Positive Tests	Negative Tests	Inconclusive Tests	Total Tests	% Positive Tests	% Negative Tests	% Inconclusive Tests
Race	5	5	3	13	38.5%	38.5%	23%
National Origin	7	3	2	12	58%	25%	17%
Familial Status	4	7	3	14	29%	50%	21%
Disability	3	9	0	12	25%	75%	0
<b>Totals</b>	<b>19</b>	<b>24</b>	<b>8</b>	<b>51</b>	<b>37%</b>	<b>47%</b>	<b>16%</b>

## Retests

Protected Class	Positive Tests	Negative Tests	Inconclusive Tests	Total Retests	% Positive Tests	% Negative Tests	% Inconclusive Tests
Race	0	1	1	2	0	50%	50%
National Origin	4	3	0	7	57%	43%	0
Familial Status	0	2	0	2	0	100%	0
Disability	0	1	0	1	0	100%	0
<b>Totals</b>	<b>4</b>	<b>7</b>	<b>1</b>	<b>12</b>	<b>33.3%</b>	<b>58.3%</b>	<b>8.3%</b>

# Testing Conclusions

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- **In more than 1/2 of all housing transactions tested something happened that was adverse to protected class testers; this indicates:**
- **Retesting affirmed issues specific to National Origin**

# Fair Housing Compliance Recommendations

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- ▣ **Continued training for housing provider, advocates and housing**
- ▣ **Fair housing information should reach all rental owners at time of purchase**
- ▣ **Increase informal advocacy in order to resolve issues quickly and systemically**
- ▣ **Self-testing can verify the effectiveness of housing provider training**
- ▣ **Housing providers should review all policies and collateral materials for any potentially discriminatory impacts**
- ▣ **Housing providers should take steps to ensure that all prospective tenants are provided equivalent information**
- ▣ **Housing providers should continue to ensure on-going training is conducted for RA/RM processes to be sure turnover of staff doesn't diminish site skills/knowledge**

# Recommendations continued...

- ❑ **Housing consumers should be made aware of policies and practices that signal differential treatment and encouraged to be vigilant for potential violations of their rights as well as encouraged to take action when such treatment is suspected.**
- ❑ **Continued monitoring of housing provider practices**
- ❑ **Additional outreach about inappropriate practices**
- ❑ **Planning and coordination between jurisdictions and fair housing advocates**
- ❑ **Review of land use and zoning policies and practices with an equity lens**
- ❑ **Design and construction review**

# Community Hotlines CAT and 211

# Analysis of 211 calls

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**WHO CALLED 211 in February 2013?** 4275 people. Majority low income 0-\$38,000

- 3,816 people who answered the eviction question. **These numbers reflect callers from around the state;**

## **What do we know about eviction?**

- 434 callers, or 11% of the people who answered the question, reported experiencing a no-cause eviction. (Question asked: Have you ever received a move-out notice, even though you were not late on rent or broke the rules of your rental agreement?)

## **How do the evicted compare to the non-evicted?**

- Groups who reported higher rates of eviction were:
- American Indian/Alaska Native people - 18% of callers who reported this status said they had been evicted, as compared to 11% of callers who did not report this status
- Disabled/special needs households - 14% of callers who reported this status said they had been evicted, as compared to 11% of callers who did not report this status

## **What is the relationship between reporting a history of eviction and reporting delays to request?**

- People who reported a history of eviction were FAR more likely to report delaying requesting repairs: 37% of people who had been evicted reported delaying requests, as compared to 7% of those who did not report eviction.

Analysis of 211 data in February 2013

# Disability Rights Oregon

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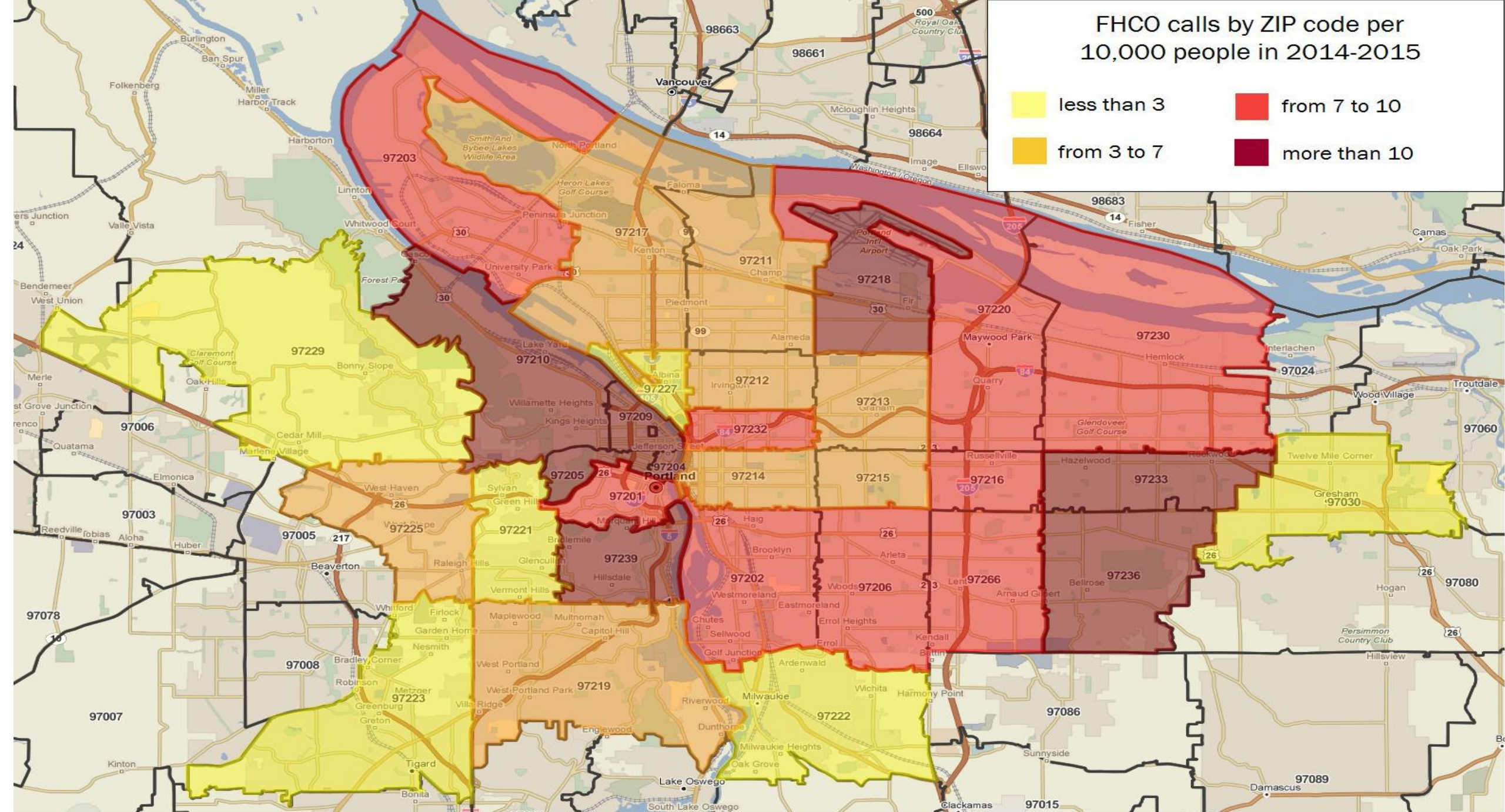
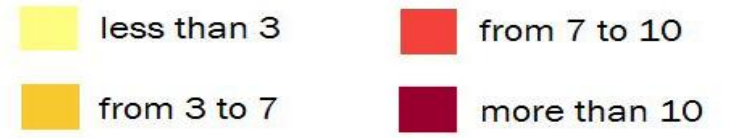
- May supplement report with this data.

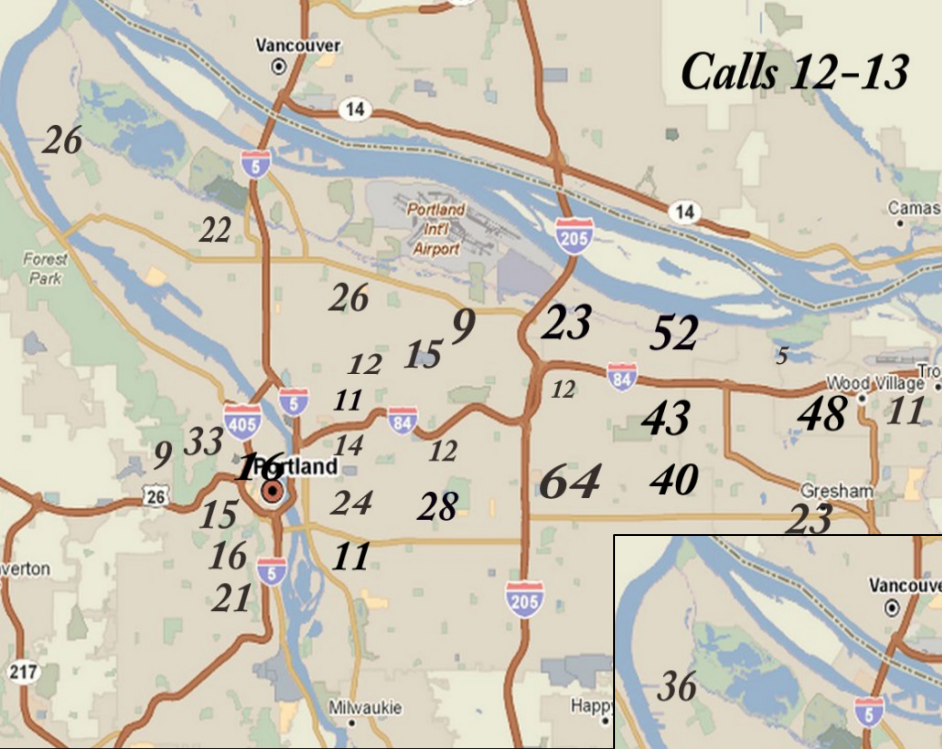
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# Geography of Fair Housing Complaints



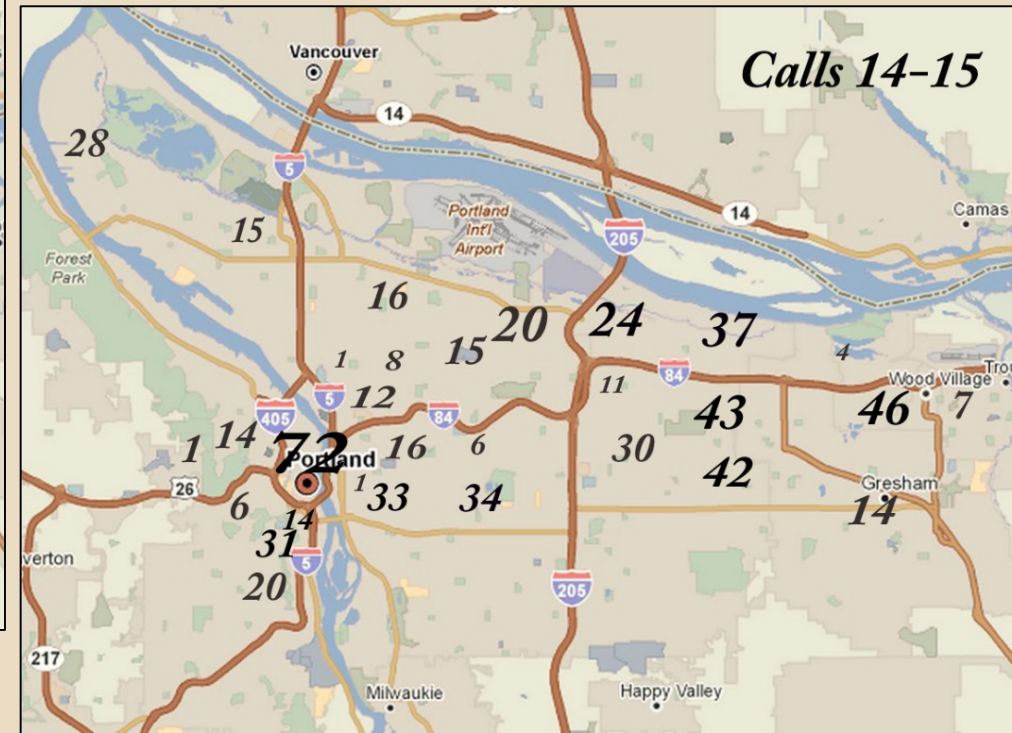
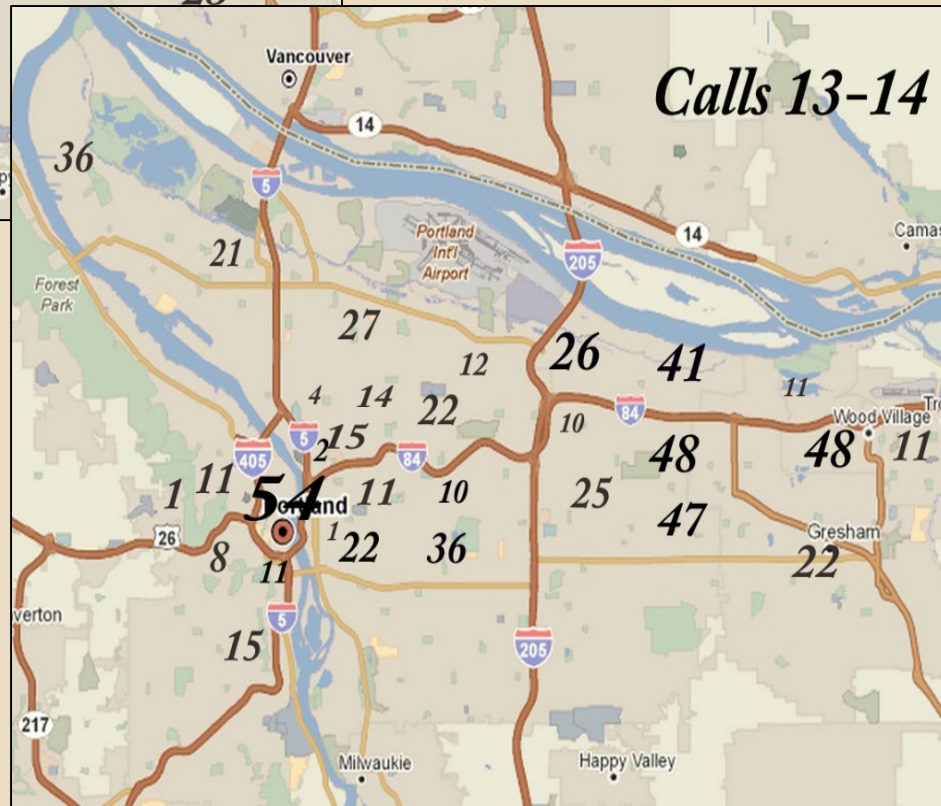
# FHCO calls by ZIP code per 10,000 people in 2014-2015

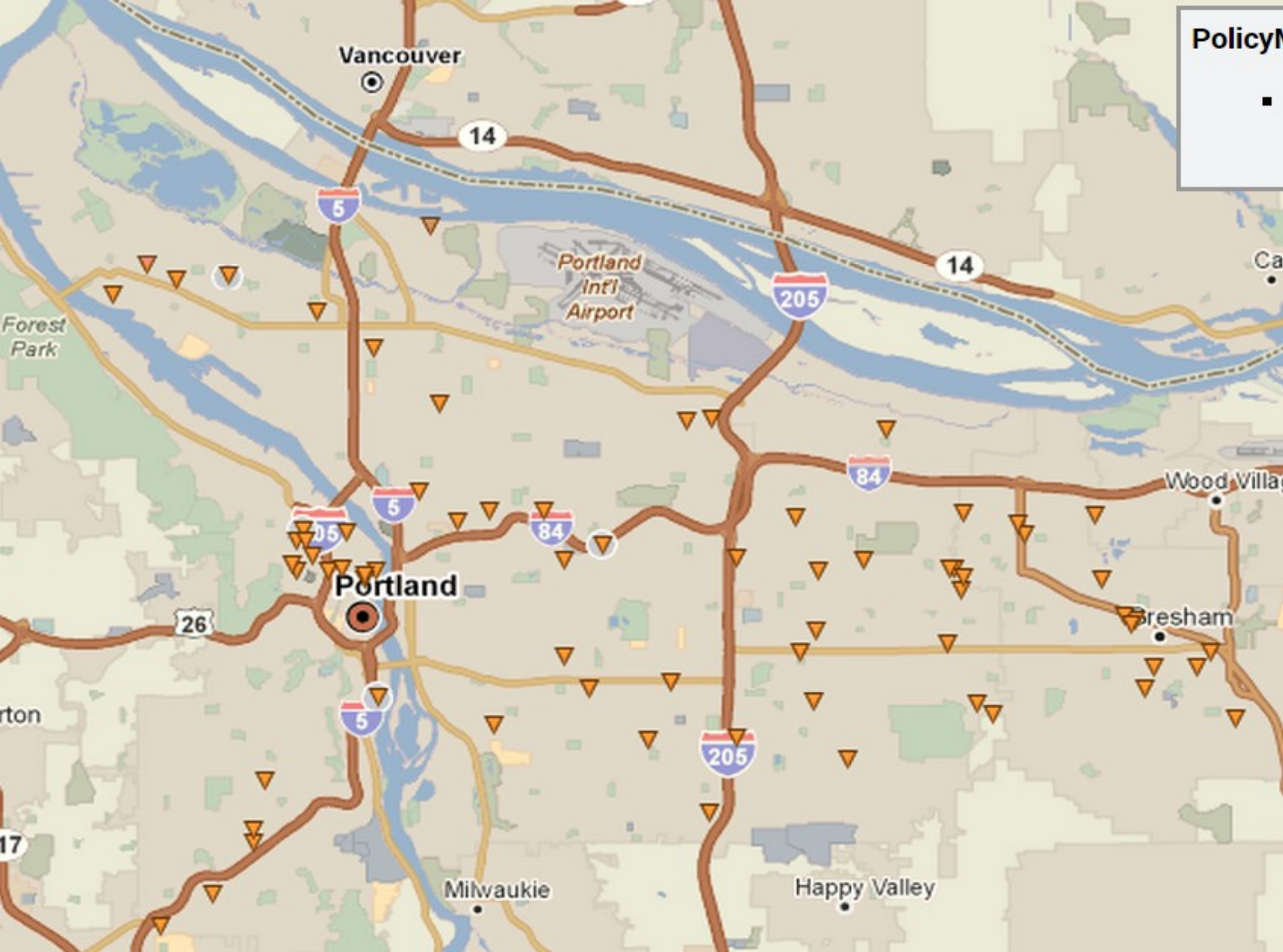




## Distribution of Fair Housing Council of Oregon Hotline Calls 2012-2015

### City of Portland, City of Gresham, Multnomah County





Fair Housing Council of Oregon Intakes 2011-2014 mapped for Multnomah County

# Geography of Community Alliance of Tenants hotline calls

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## Residence

### 4. Residence

Residence	Total This Quarter	Total Year-To-Date
NE Portland	93	353
SE Portland	139	484
NW Portland	39	97
SW Portland	80	185
N Portland	46	157
Other	236	801
Total	633	2077

## Head of Household

### 6. Other

Other	Total This Quarter	Total Year-To-Date
Female Head of Household (Required)	68	342
Elderly Head of Household (Over 65)	43	160
Disabled/Special Needs	166	736

# FHCO location data

## 4. Residence (Hotline Calls)

Residence	Total This Quarter	Total Year-To-Date
AREA 1   Northeast	17	71
AREA 2   Southeast	22	83
AREA 3   Northwest	13	60
AREA 4   Southwest	12	49
AREA 5   N. Portland	7	43
AREA 6   Downtown Portland	14	56
AREA 7   Outer SE	29	127
AREA 8   Gresham / Fairview / Troutdale	16	28
AREA 9   Outer NE	19	61
AREA 10   PDX Metro (Outer SW)	17	44
<b>OTHER: Milwaukie</b>	0	13
<b>Total</b>	166	635

# Geography of Legal Aid Services of Oregon

Fair Housing Council of Oregon

211

Legal Aid Services of Oregon

Community Alliance of Tenants

Number of Legal Aid Services of Oregon Fair Housing complaints from Portland residents appear to be concentrated in Northeast and Southeast Portland.

Chart of location of incident for Legal Aid Services of Oregon Fair Housing cases

5. Incident	2011-2012	2012-2013	2013-2014	2014-2015	TOTALS
NE Portland	19	13	12	22	66
SE Portland	27	23	36	24	110
NW Portland	1	2	4	4	11
SW Portland	10	9	5	10	34
N Portland	7	9	9	6	31
<b>Total</b>	<b>64</b>	<b>56</b>	<b>66</b>	<b>66</b>	<b>252</b>



**PORTLAND HOUSING BUREAU**

Dan Saltzman, Commissioner  
Kurt Creager, Director

# STATE OF HOUSING IN PORTLAND

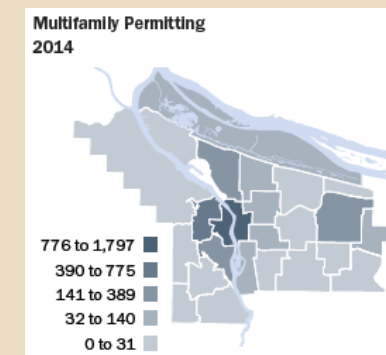
October 2015





# Trends

- **Growth:** Solid growth in the Central City
  - +7,000 (5,000 households) between 2000 and 2013
  
- **Supply:** Production anticipated to surpass pre-recessionary levels within the next year
  - 1,500+ units produced and 5,100+ permitted in 2014
  
- **Development:** Shifting from single-family to multifamily
  - Highest multifamily production: Northwest, Interstate, Belmont-Hawthorne-Division
  - Highest Multifamily permitting in Central City, Northwest, Interstate







# Areas of Concern

## □ Wage Stagnation:

- Household incomes remained flat in 2014

## □ Income Disparities:

- Median income of Communities of Color \$24K - \$38K lower than White households

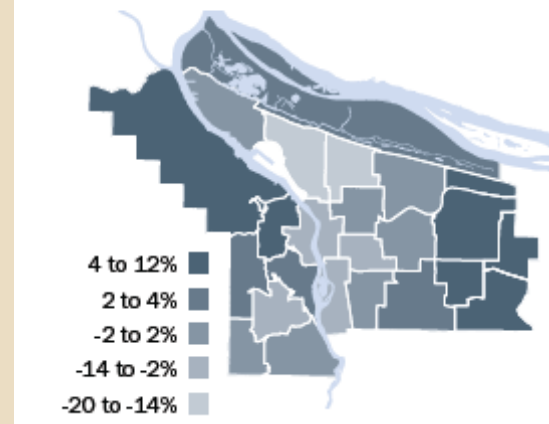
## □ Homelessness:

- Almost no change in overall numbers (3,800 in 2015)
- Significant increase among African Americans (+48%)
- Increase among women (+15%)

## □ Neighborhood Choice:

- Shift in concentration of Communities of Color from close-in neighborhoods to Outer East and Southeast

**Change in Racial Diversity by Neighborhood  
2000-2013**



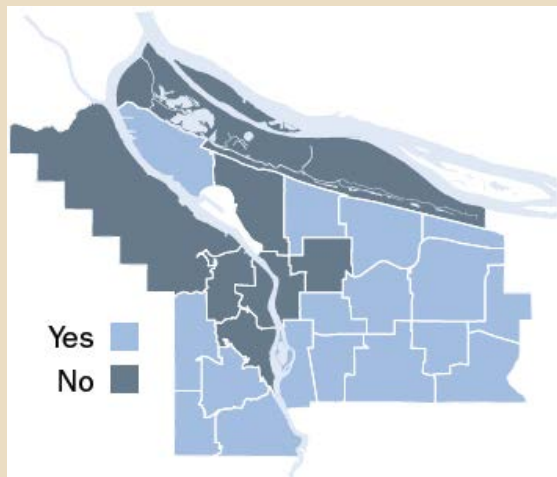


# Affordability: Rental Housing

- Rents increased approx. \$100/month in last 12 months
- Significant increases concentrated in inner/outer southeast neighborhoods

## 3 Person Household Rental Affordability

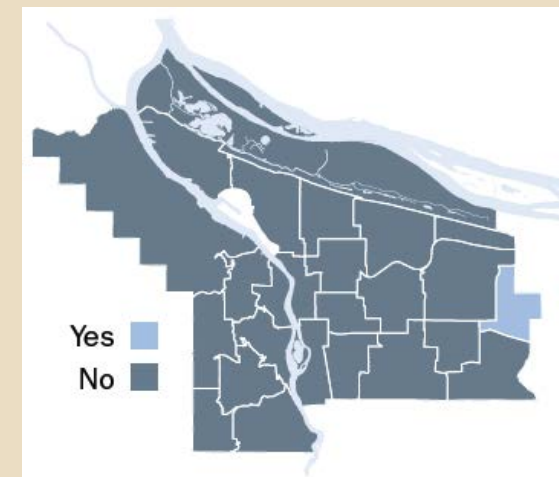
**White Household**



**Black Household**



**Latino Household**



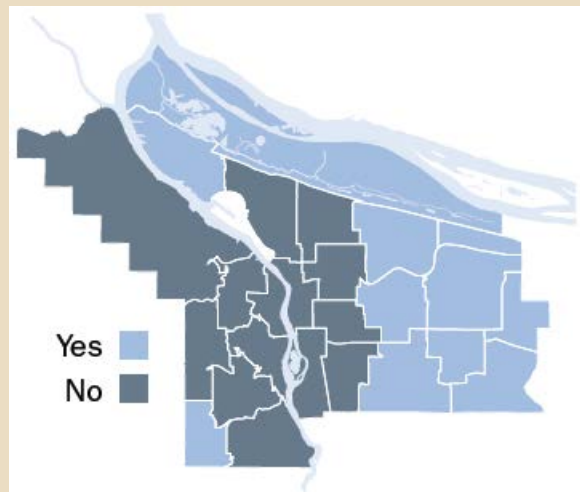


# Affordability: Homeownership

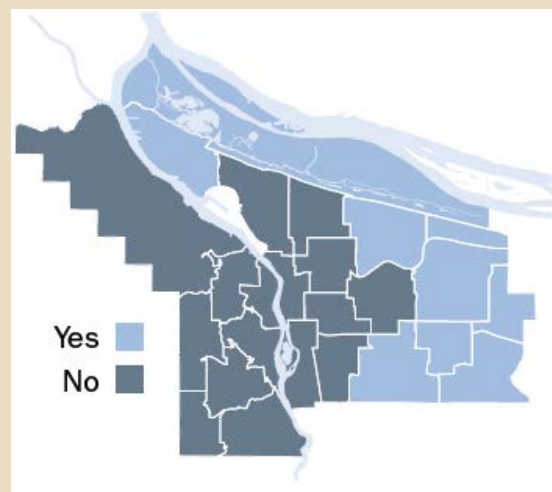
- 32% price increase from 2011- 2014 (approx. \$75,000)
- Highest increases: Lents-Foster (61%), Parkrose-Argay and Pleasant Valley (41%)

## 3 Person Household Homeownership Affordability

**White Household**



**Asian Household**



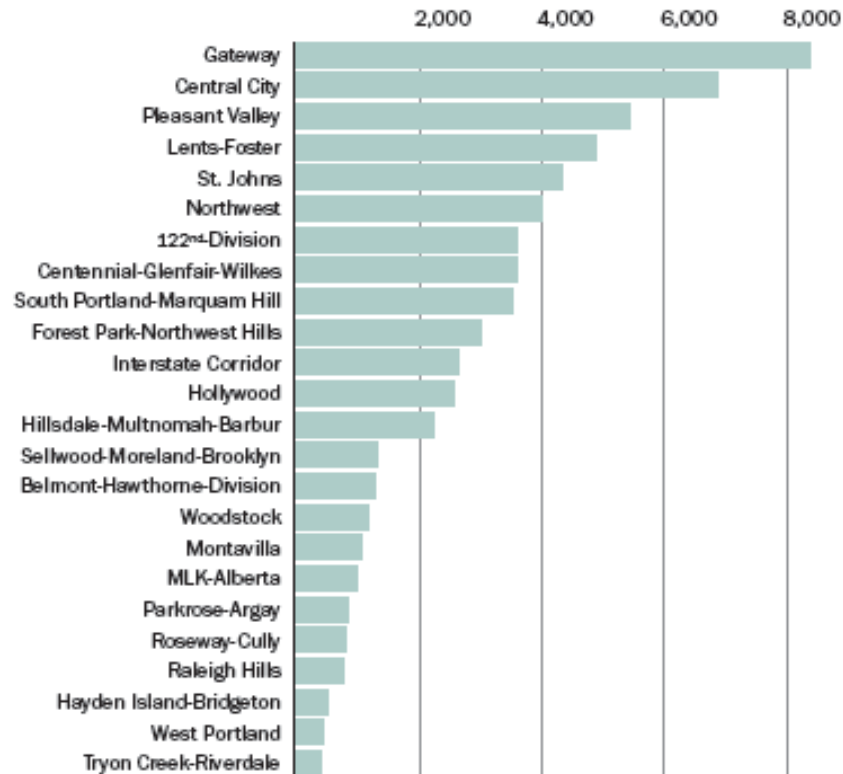
**Native American Household**



# Racial Equity Considerations

## Population growth

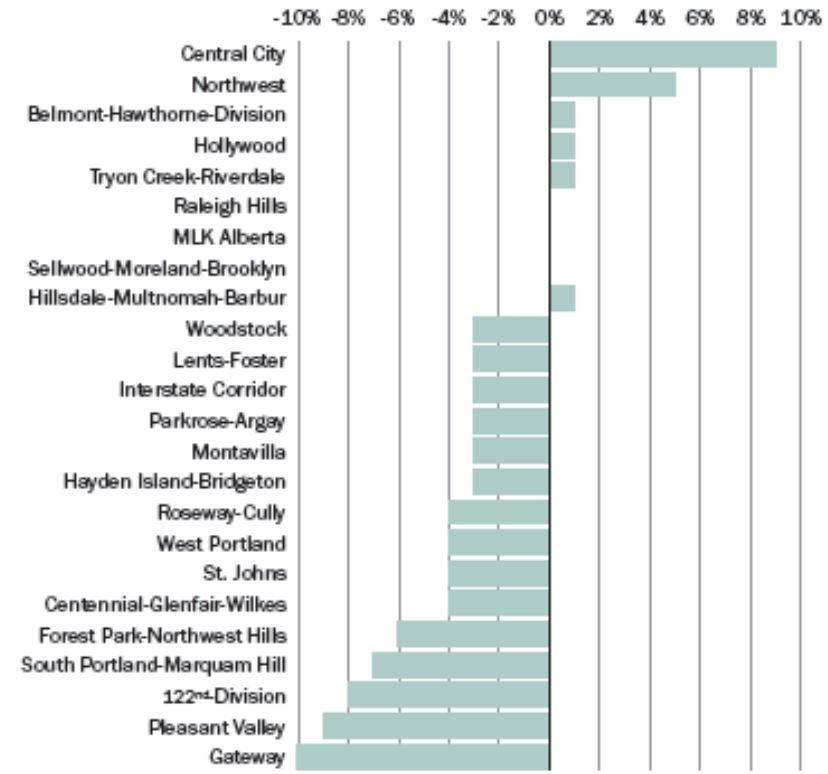
**Fig. 2.2** Population Growth by Neighborhood, 2000-2013



Source: U.S. Census Bureau - 2000 Decennial Census, 2013 5-Year ACS Estimates

## Change in rate of homeownership

**Fig. 2.8** Change in Rate of Homeownership by Neighborhood, 2000-2013

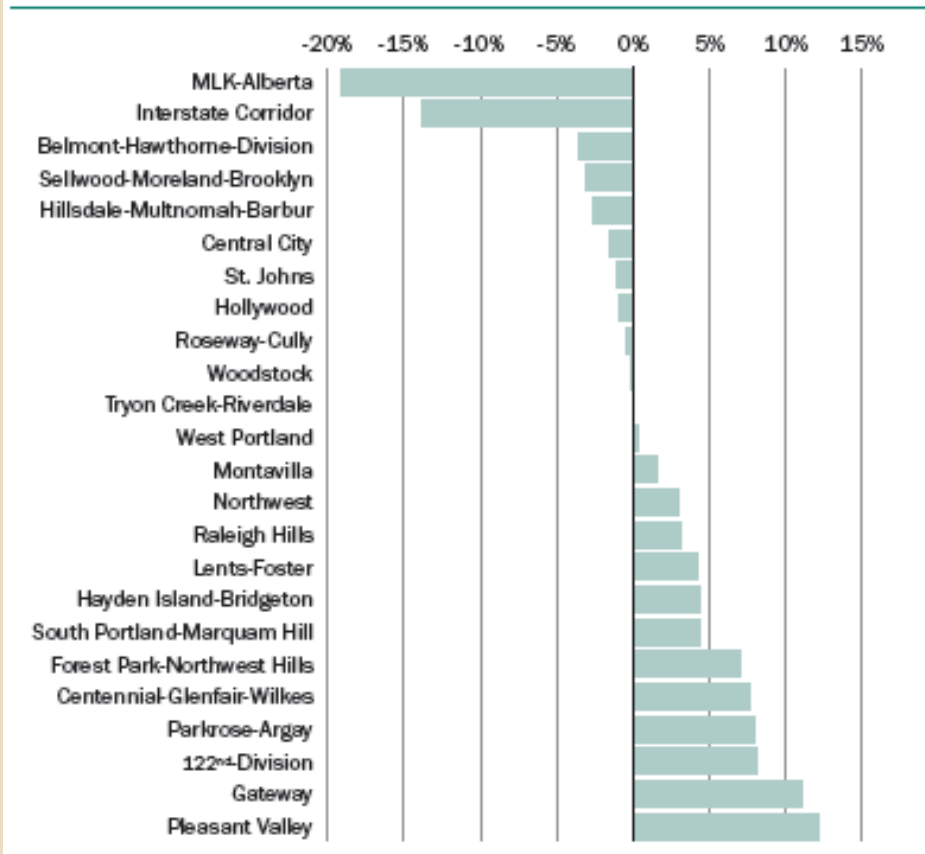


Source: U.S. Census Bureau - 2000 Decennial Census, 2008-2013 5-Year ACS Estimates

# Racial Equity Considerations

## Change in Racial Diversity by Neighborhood

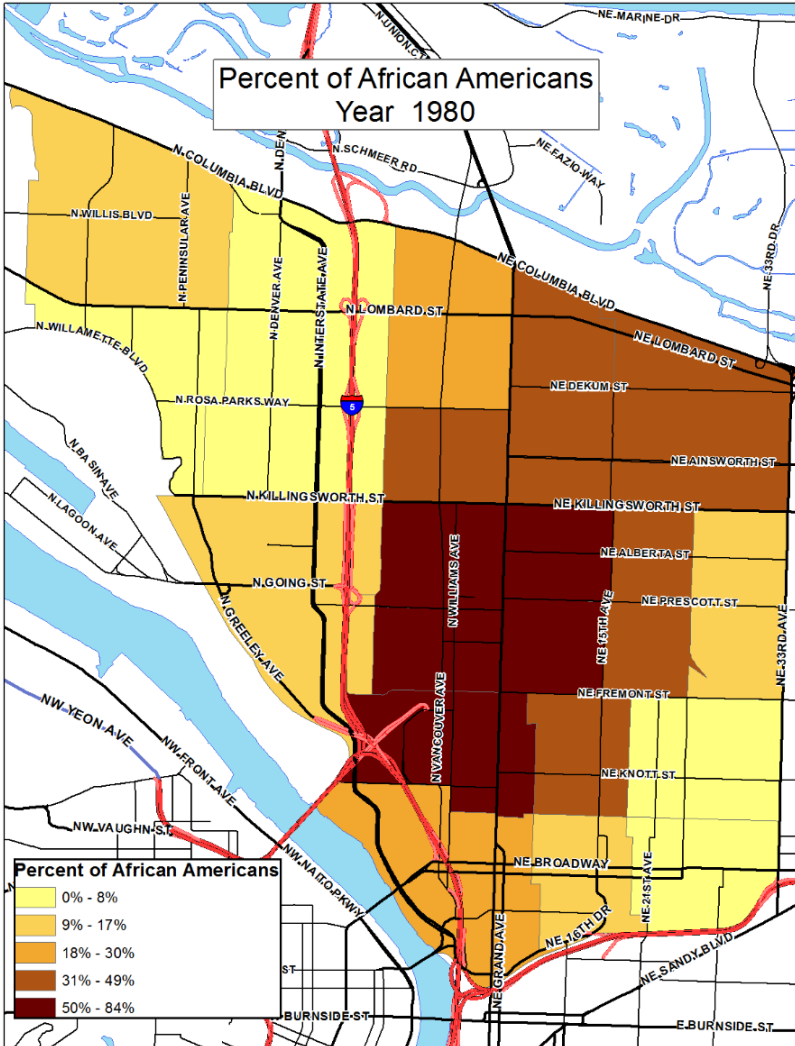
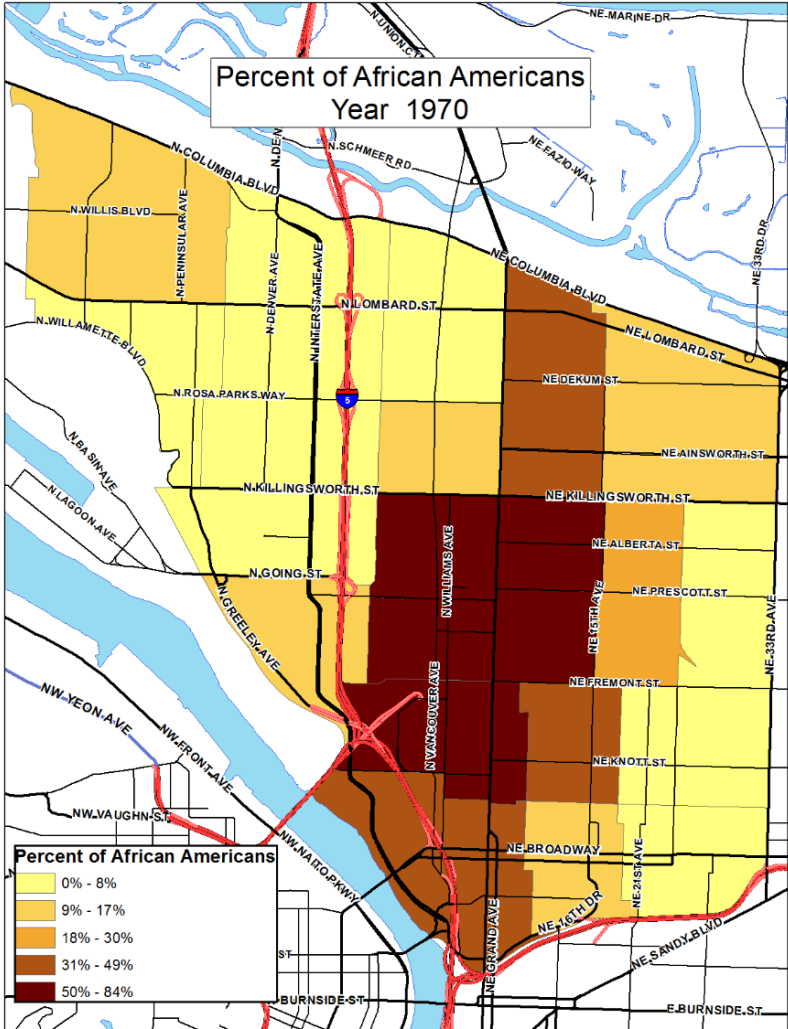
**Fig. 2.10** Change in Racial Diversity by Neighborhood, 2000-2013



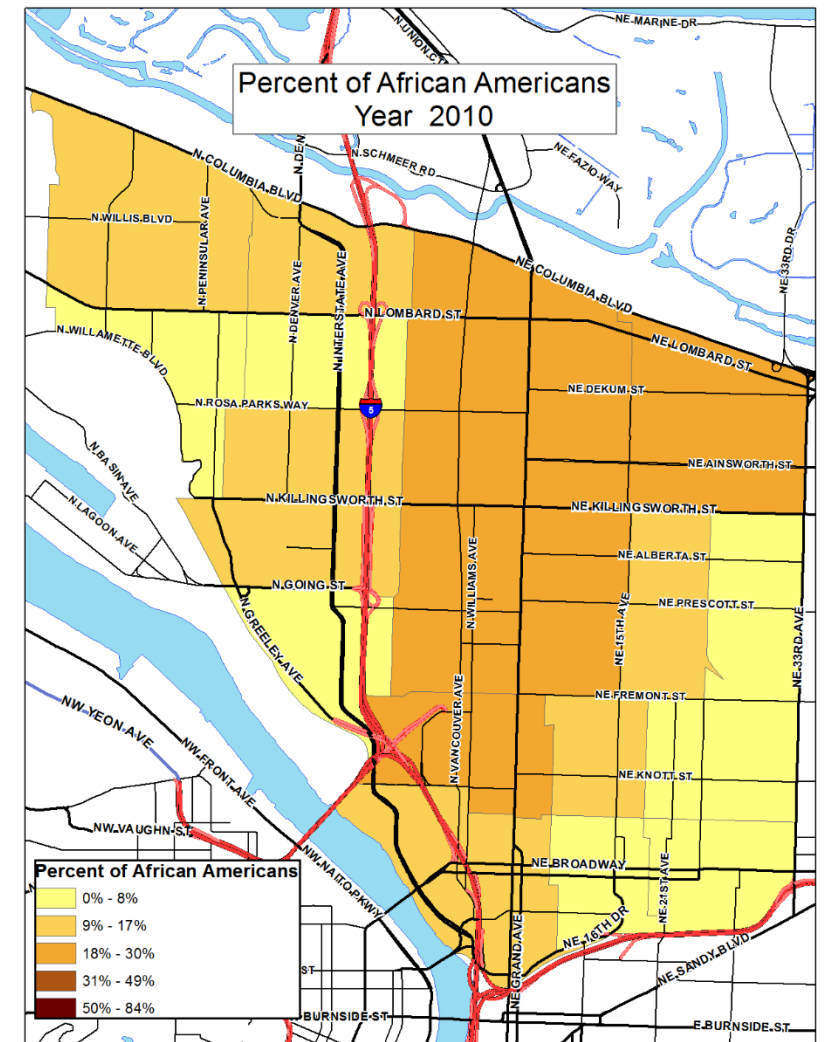
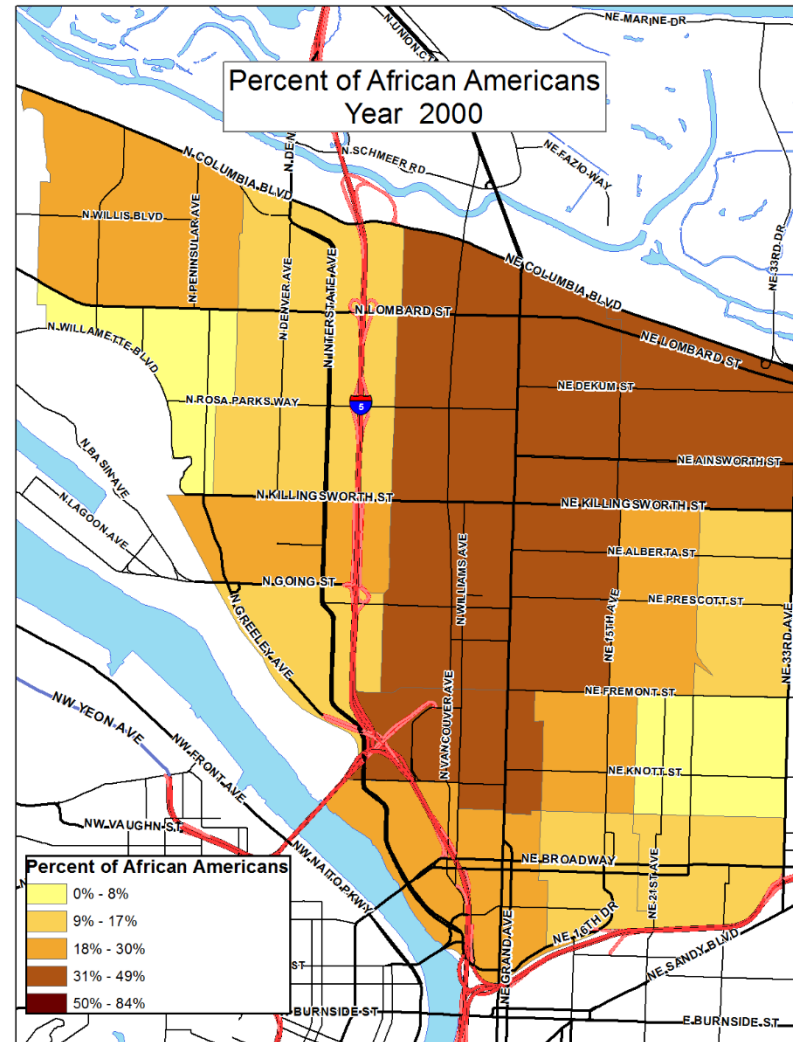
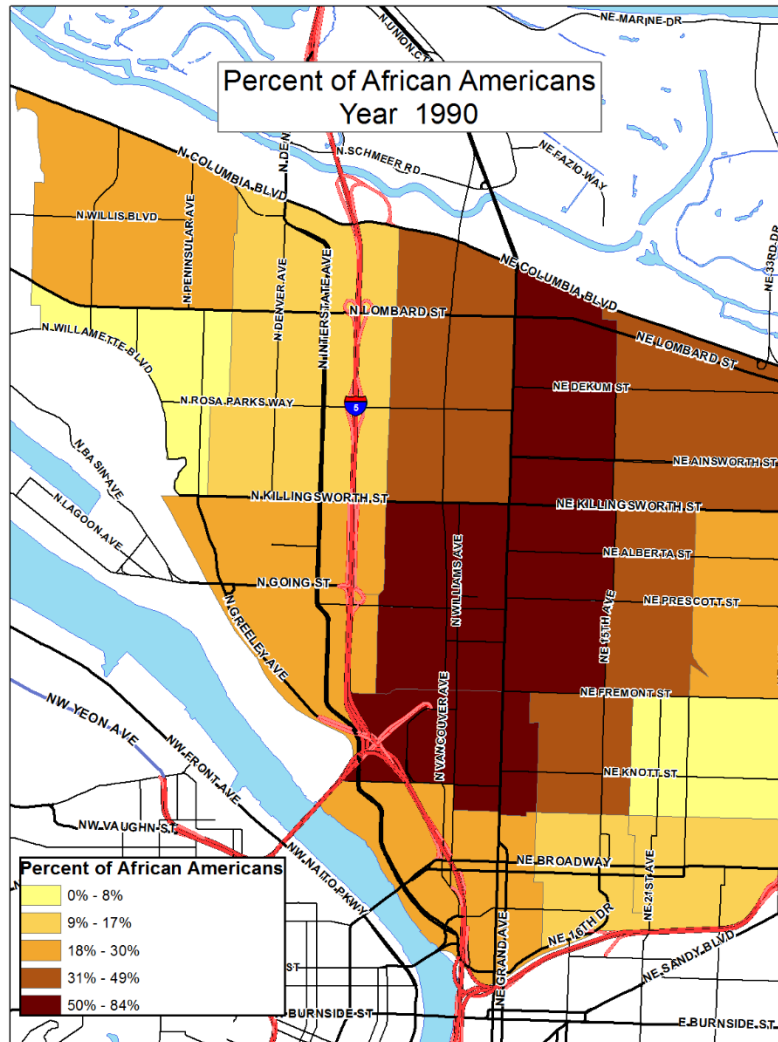
Source: U.S. Census Bureau - 2000 Decennial Census, 2013 5-Year ACS Estimates

Southeast Portland	Northeast Portland
Increased diversity	Decreased diversity
Increased population	Less population growth
Decreased rate of homeownership	

# Change in percent of African Americans 1970-1980



# Change in percent of African Americans Portland Interstate Urban Renewal Area 1990 - 2010



# Gresham Opportunity Analysis





# Demographic comparison to West Gresham

**Table 4: Demographic Composition West Gresham & Rest of Gresham Compared**

	West Gresham	Rest of Gresham	% Change in Share of Population*
Population	39,238.00	73,385.00	-46.5%
Population Density	6,253.00	3,720.00	68.1%
Percent of Population identified as White (Non-Hispanic)	57.2%	81.1%	-29.5%
Percent of Population identified as Hispanic	26.3%	14.3%	83.9%
Percent of Population identified as Asian (Non-Hispanic)	5.9%	3.7%	59.5%
Percent of Population identified as Black (Non-Hispanic)	5.6%	2.2%	154.5%

\*Percent Difference calculation is based on relative differences, 2010 CENSUS and ACS 2008-2012

# Gresham Age and Income

**Table 5: Age, Poverty, and Income - West Gresham & Rest of Gresham Compared**

	West Gresham	Rest of Gresham	% Change in Share of Population*
Percent of Population under age 18	28.0%	25.3%	10.7%
Percent of Population over age 65	10.6%	10.8%	-1.9%
Percent of Population in Poverty	27.0%	13.6%	98.5%
Percent of Population Under age 18 in Poverty	36.0%	19.9%	80.9%
Median Household Income (2012 \$)	39,082	54,743	-28.6%

\*Percent Difference calculation is based on relative differences, 2010 CENSUS and ACS 2008-2012

# Gresham Housing

**Table 7: Housing - West Gresham & Rest of Gresham Compared**

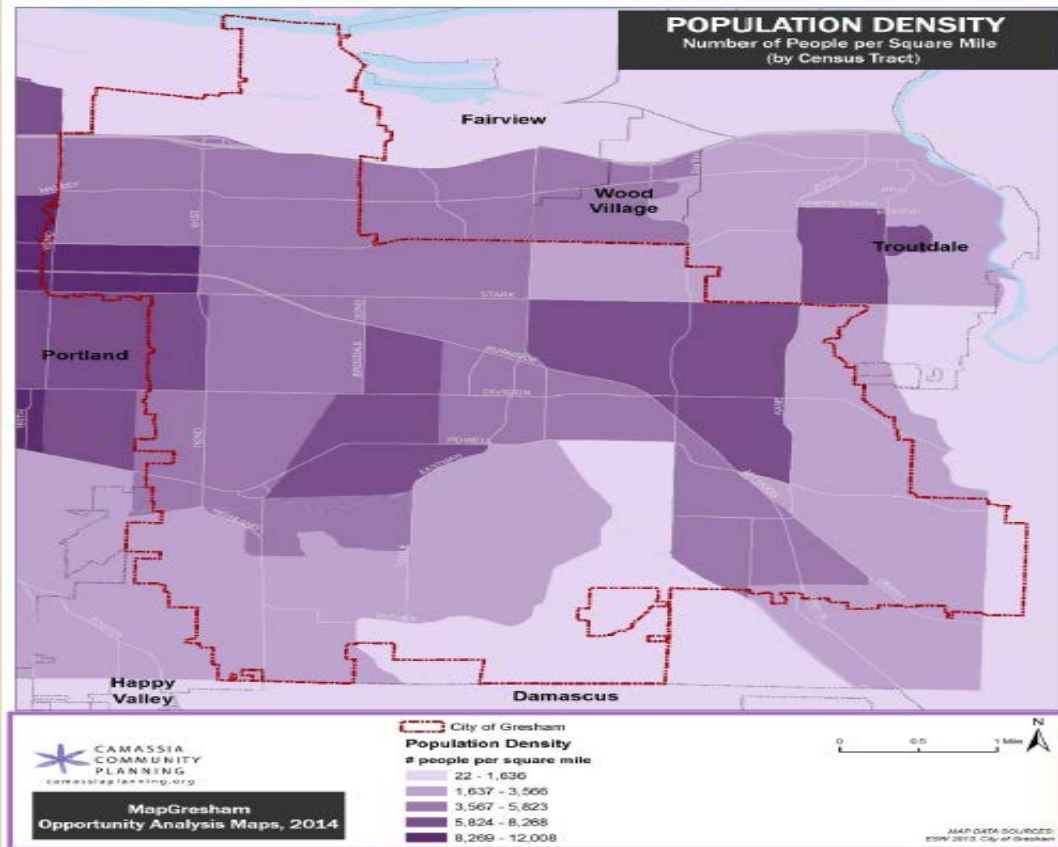
	West Gresham	Rest of Gresham	% Change in Share of Population*
Housing Units	14,490	29,366	-50.7%
Percent of Housing Units that are single-family	67.0%	76.0%	-11.8%
Percent of Households that are renter-occupied	54.3%	44.1%	23.1%
Median Gross Rent (2012 \$)	900	1,015	-11.3%
Median House Value for Owner-occupied units (2012 \$)	203,678	242,682	-16.1%

\*Percent Difference calculation is based on relative differences, 2010 CENSUS and ACS 2008-2012

# East Multnomah County

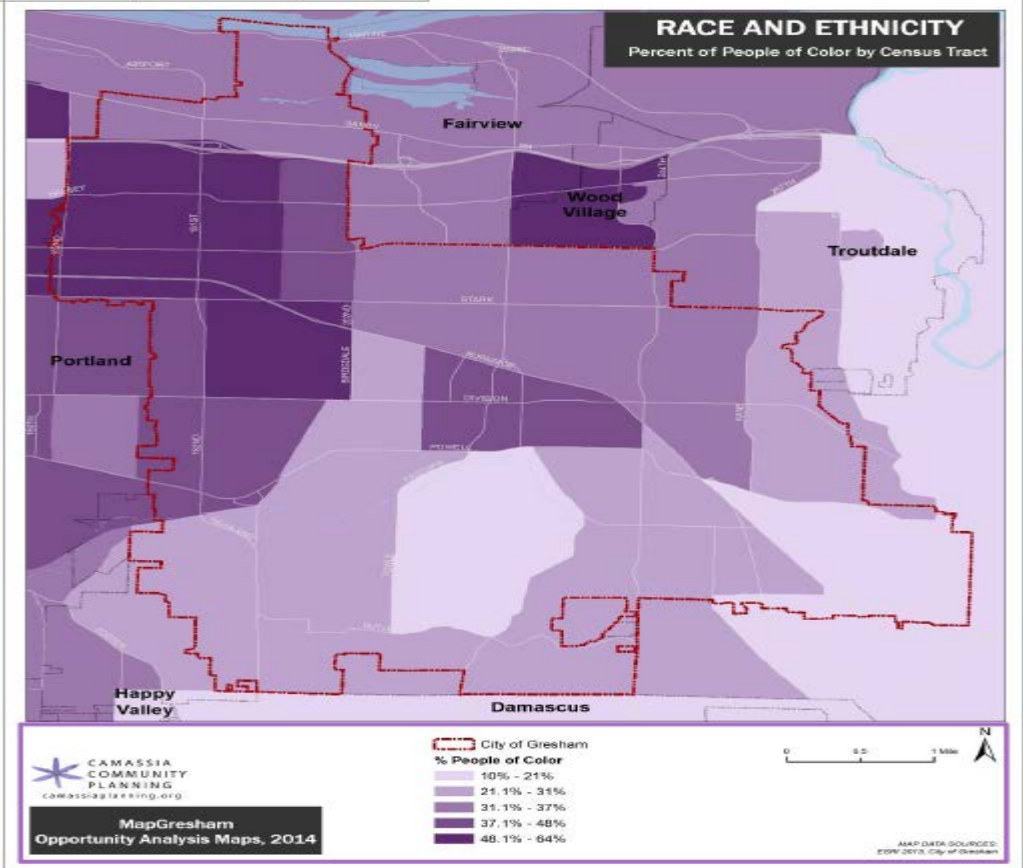
## Population Density

Map 2: Population Density



## Communities of Color

Map 4A: Population of People of Color

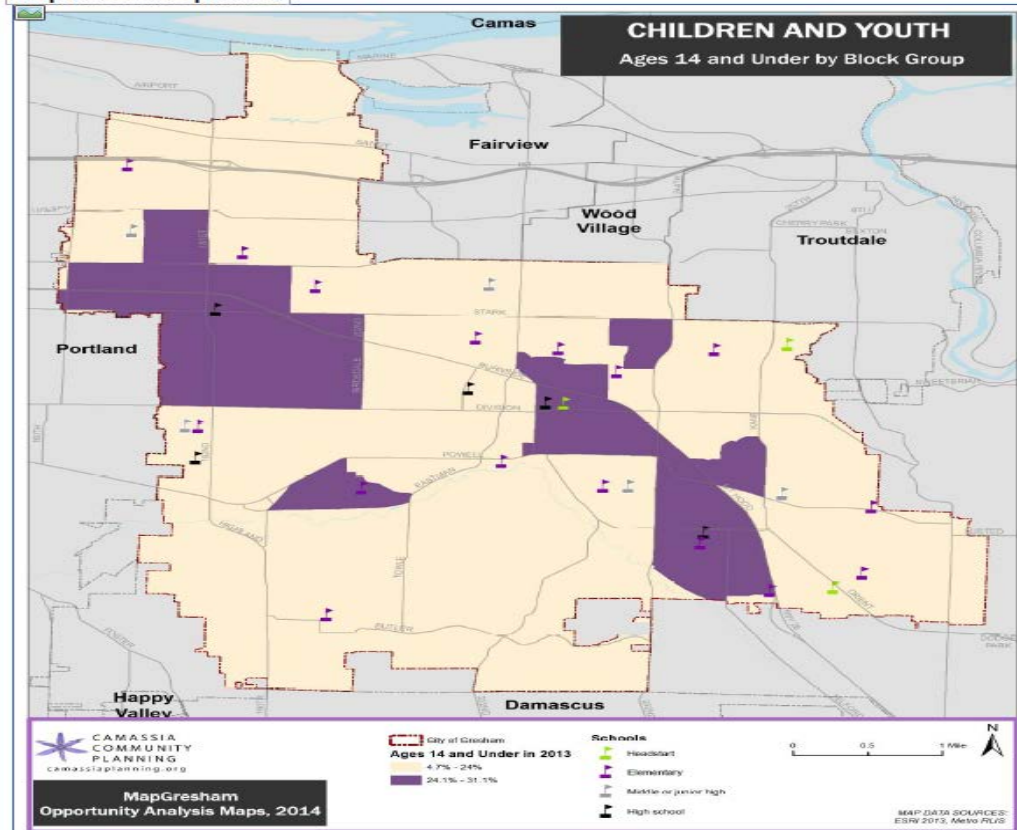


# Population Age in East Multnomah County

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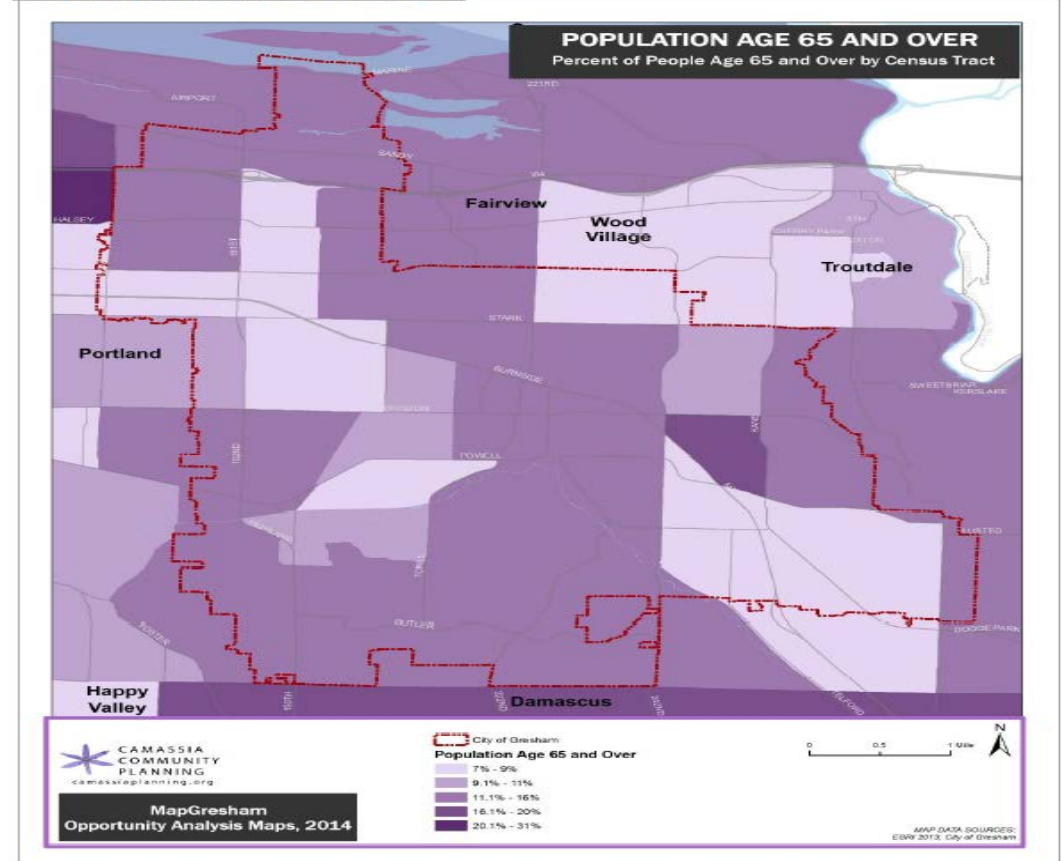
## Children and Youth under 14

Map 7: Youth Population



## Population 65 and older

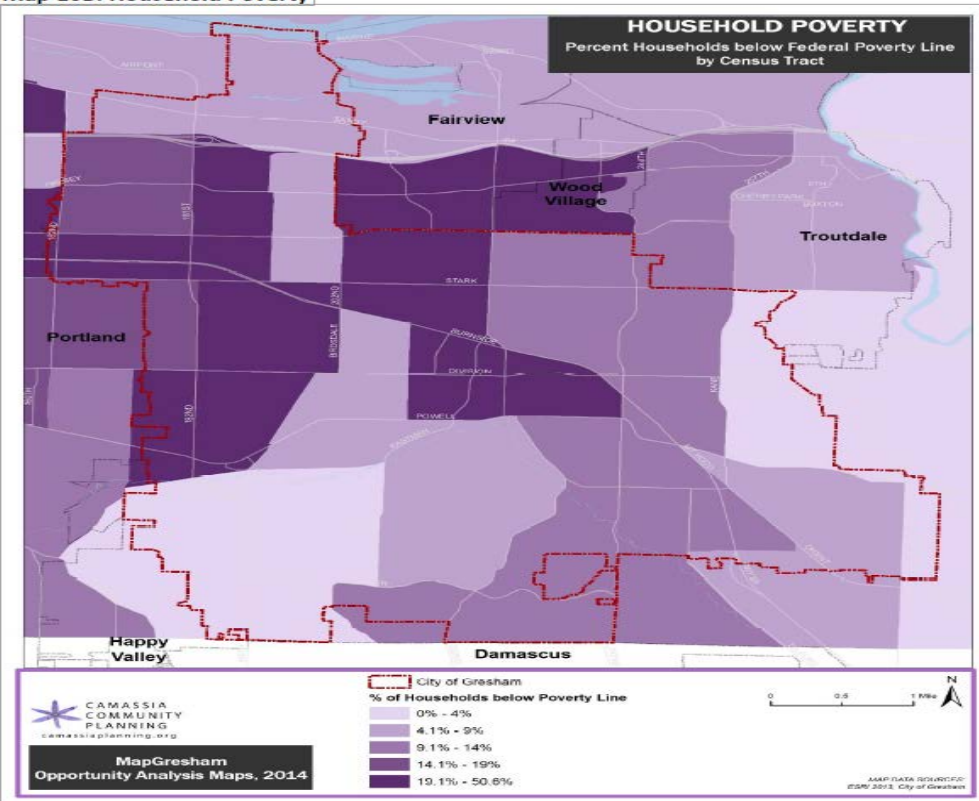
Map 8: Population Over 65 years of Age



# East Multnomah County Poverty, Unemployment

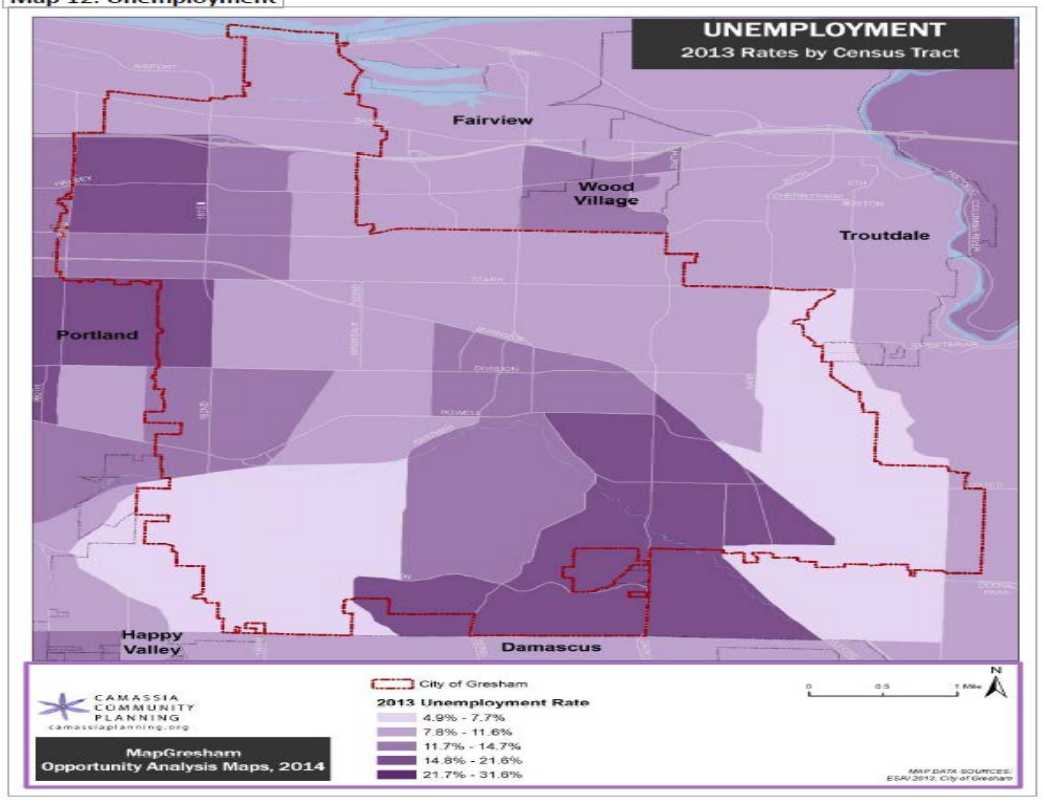
## Poverty

Map 10B: Household Poverty



## Unemployment

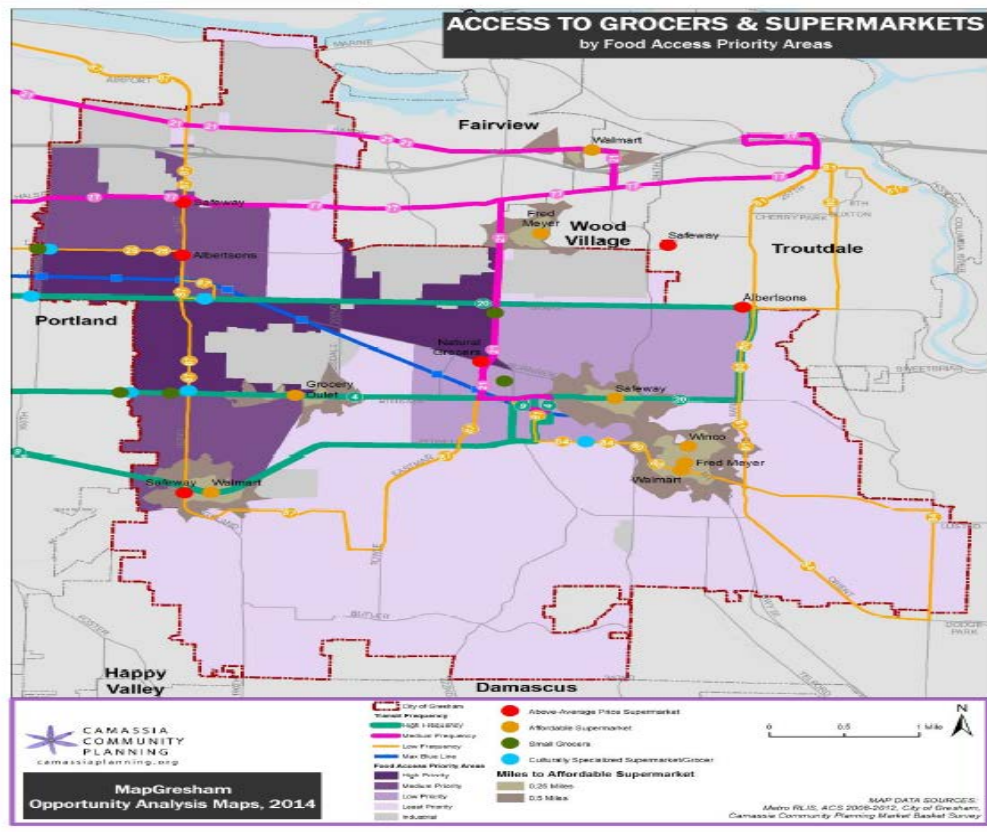
Map 12: Unemployment



# East Multnomah County Access and Health

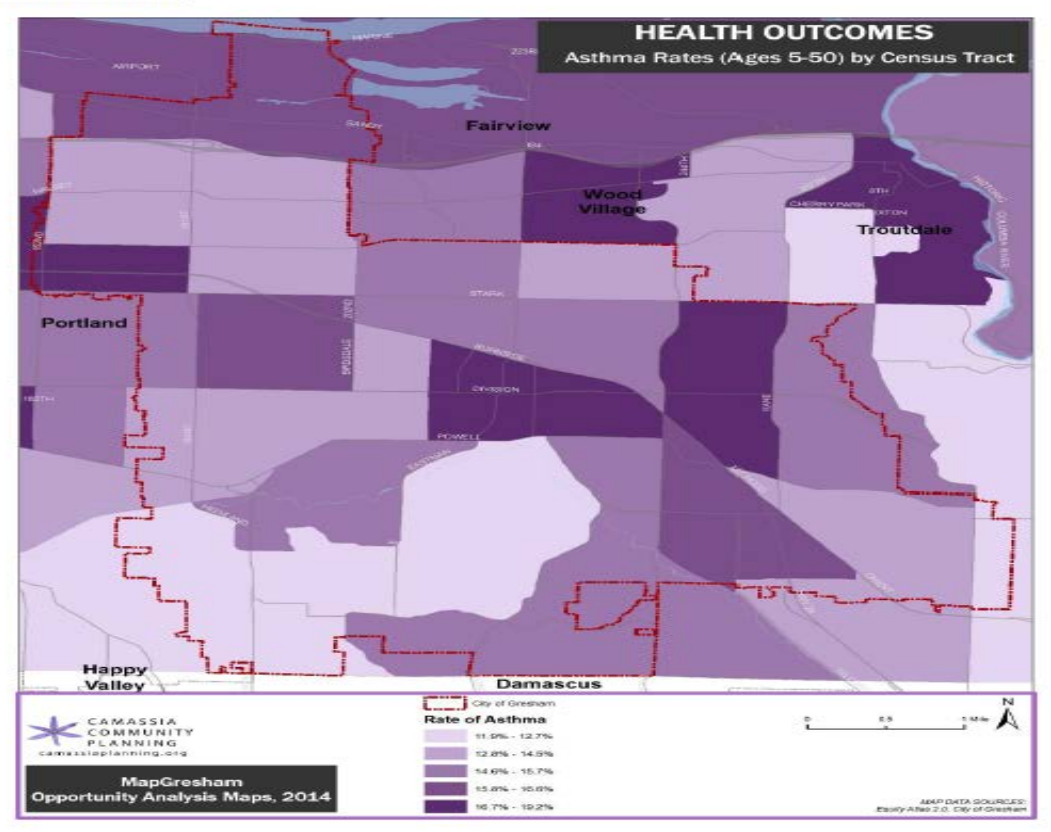
## Access to Groceries

Map 30: Access to Grocery Stores



## Health Outcomes Asthma

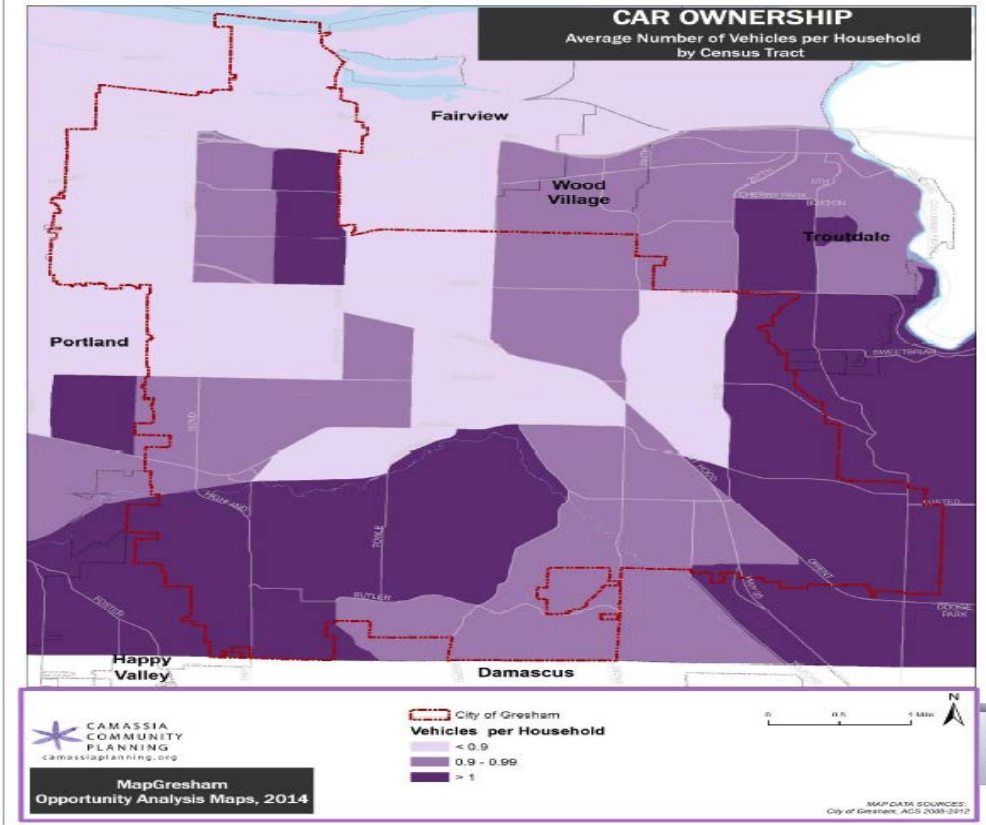
Map 17: Asthma



# East Multnomah County

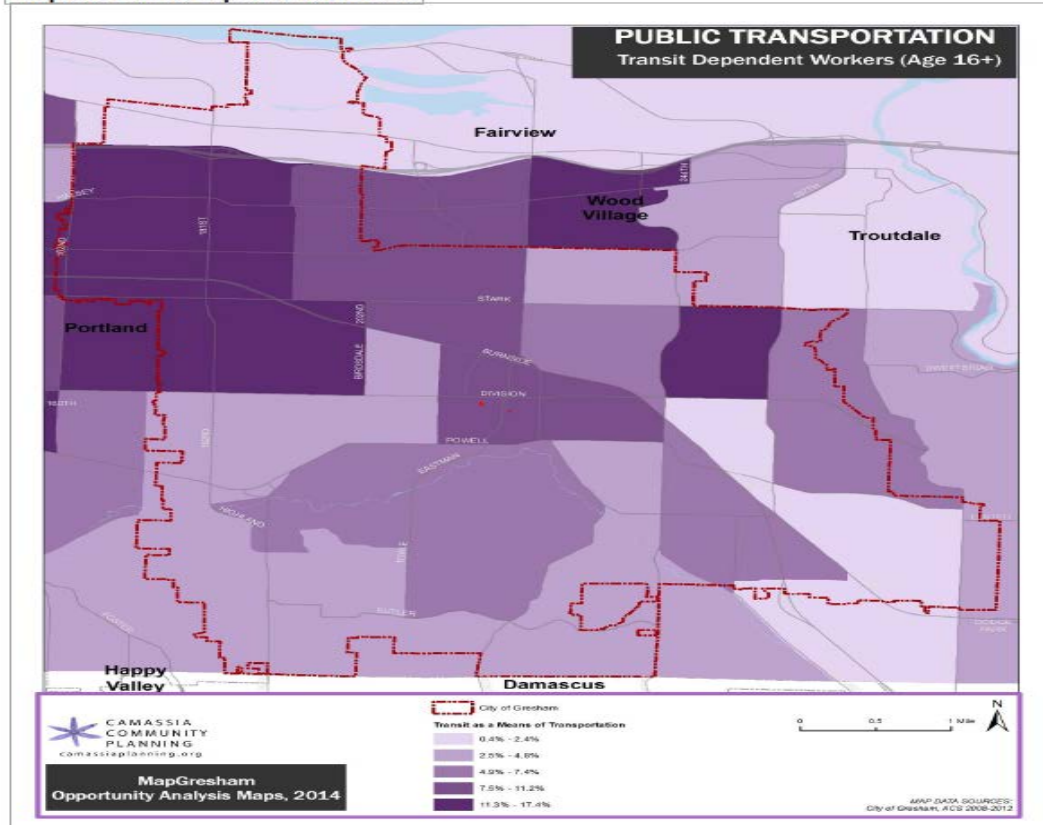
## Car Ownership

Map 13: Vehicles per Household



## Public Transportation

Map 27: Transit Dependent Workers

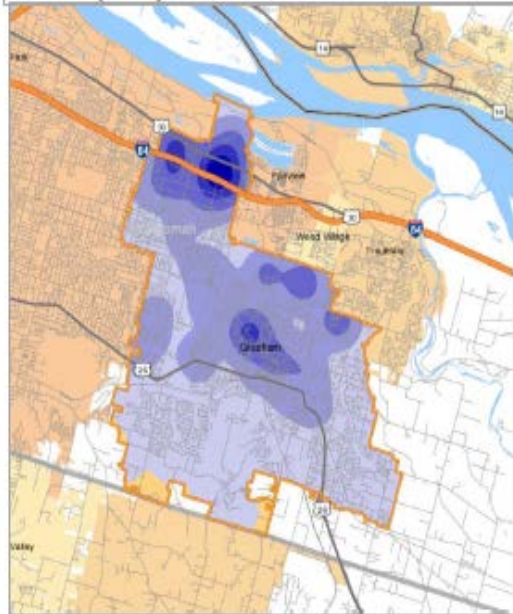




# Gresham Employment Centers

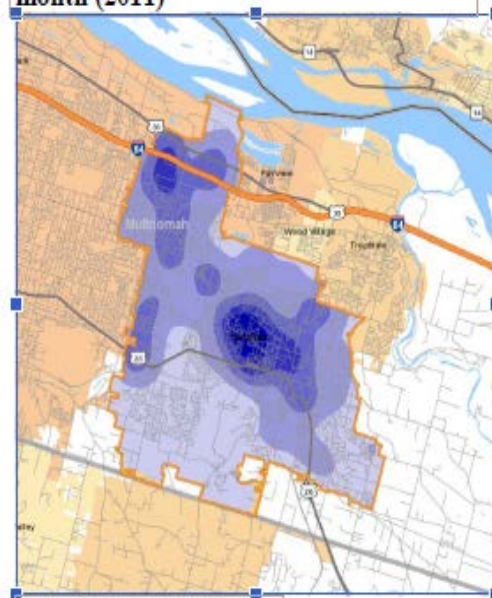
## Job Wage Geography

**Map 36G: Jobs earning \$3,333 or more per month (2011)**



- 5 - 247 Jobs/Sq.Mile
- 248 - 976 Jobs/Sq.Mile
- 977 - 2,190 Jobs/Sq.Mile
- 2,191 - 3,891 Jobs/Sq.Mile
- 3,892 - 6,077 Jobs/Sq.Mile

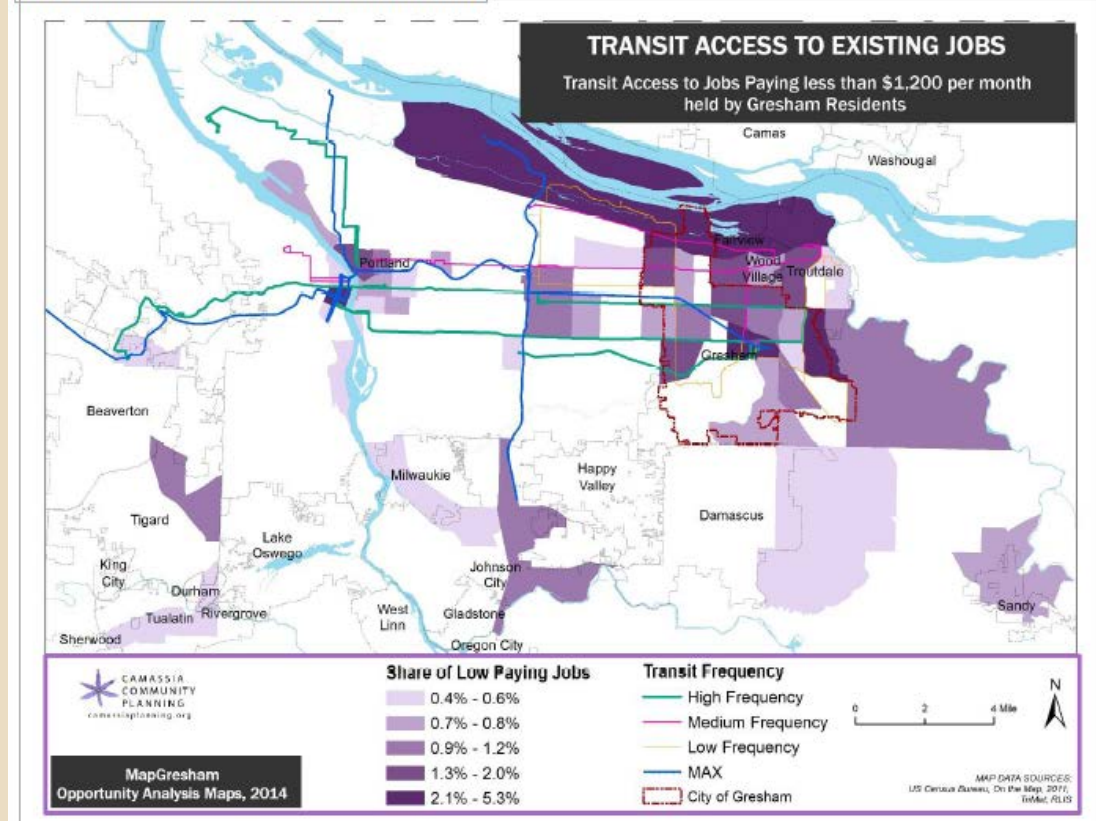
**Map 36F: Jobs earning \$1250 or less per month (2011)**



- 5 - 109 Jobs/Sq.Mile
- 110 - 422 Jobs/Sq.Mile
- 423 - 944 Jobs/Sq.Mile
- 945 - 1,675 Jobs/Sq.Mile
- 1,676 - 2,615 Jobs/Sq.Mile

## Transit to jobs

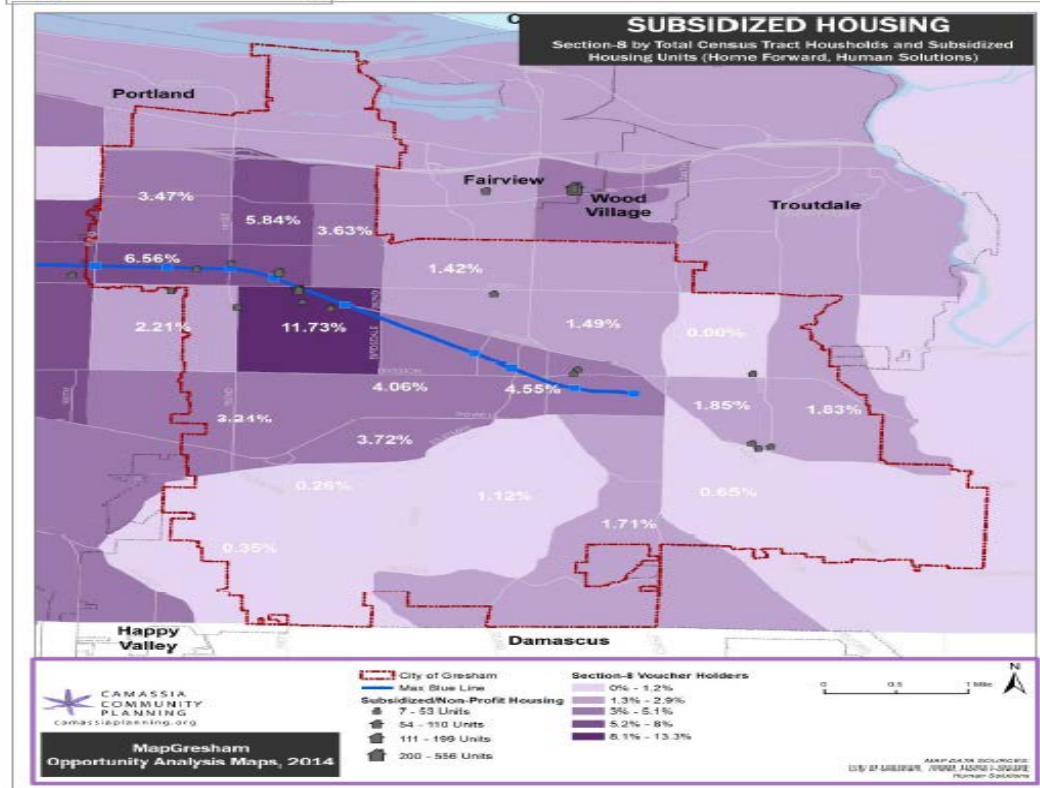
**Map 35: Transit Access to Jobs (West Gresham)**



# East Multnomah County Rental Housing

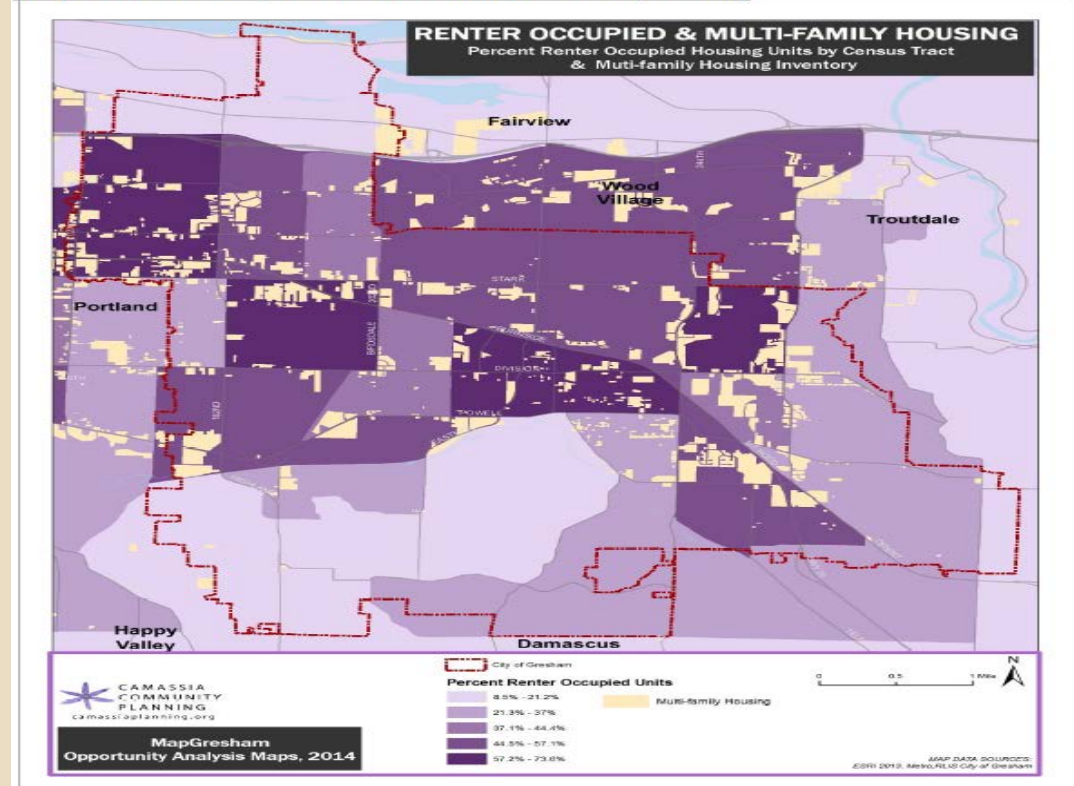
## Subsidized Housing

Map 24: Subsidized Housing



## Renter and Multifamily

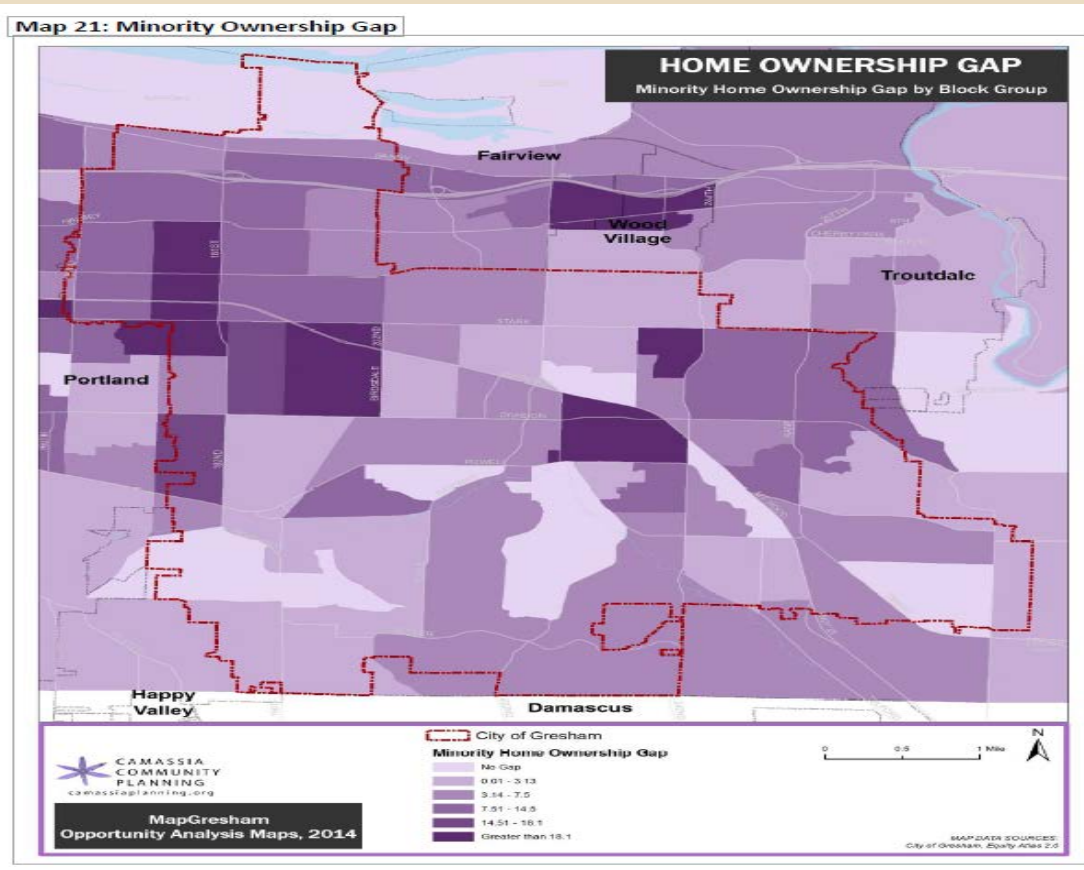
Map 22: Renter Occupied Households with Multi-family Housing



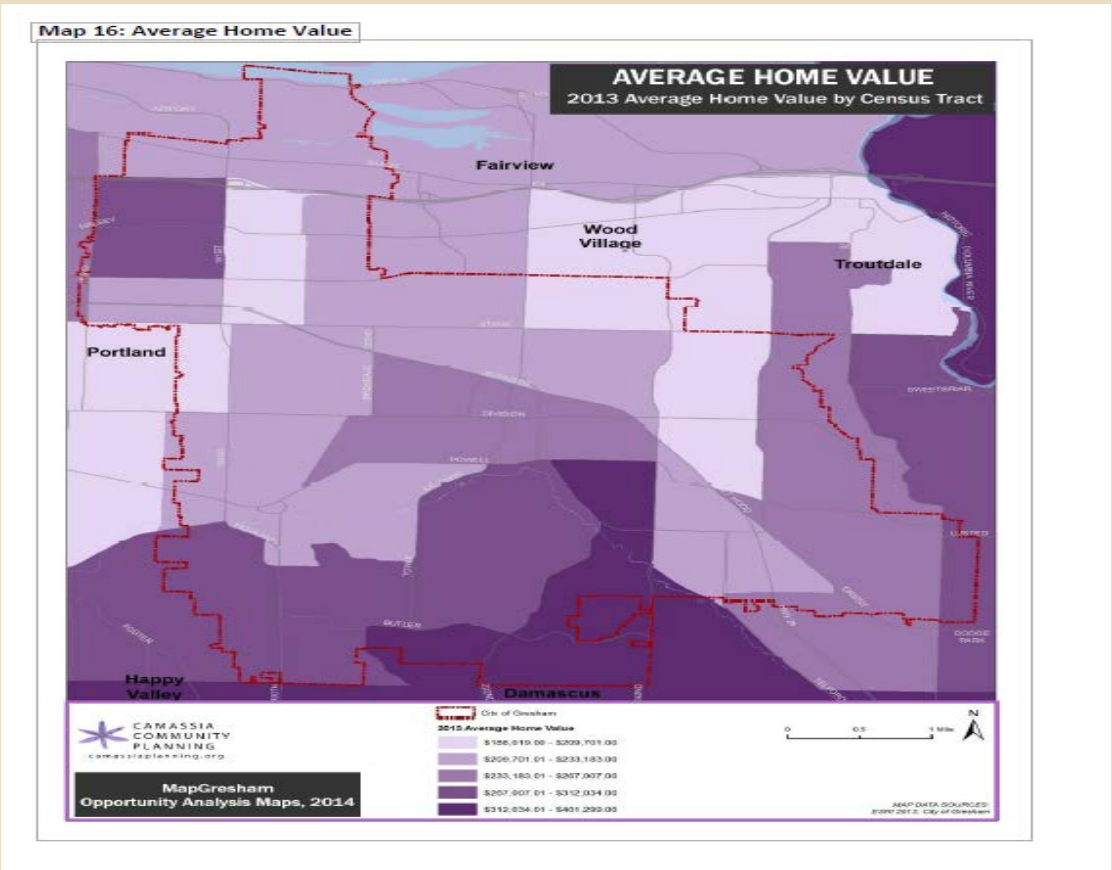
# East Multnomah County Ownership

43

## Homeownership Gap

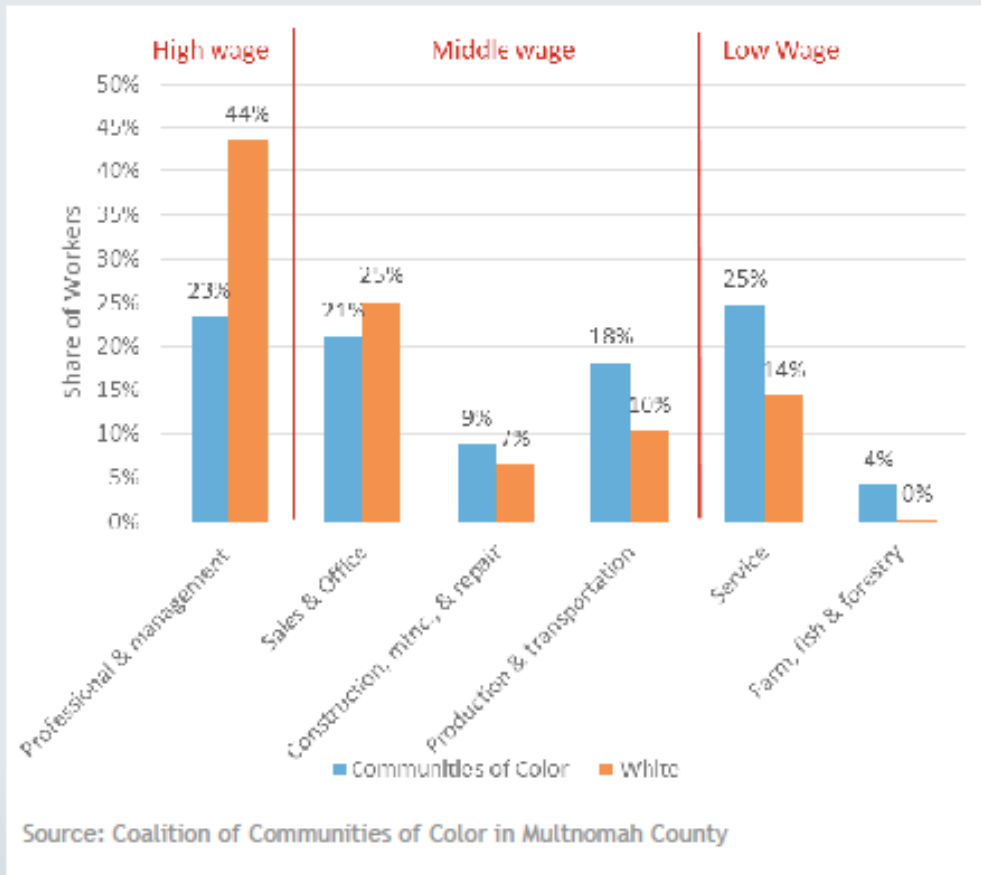


## Average Home Value



# Occupational disparities by race

(Multnomah County, 2008)

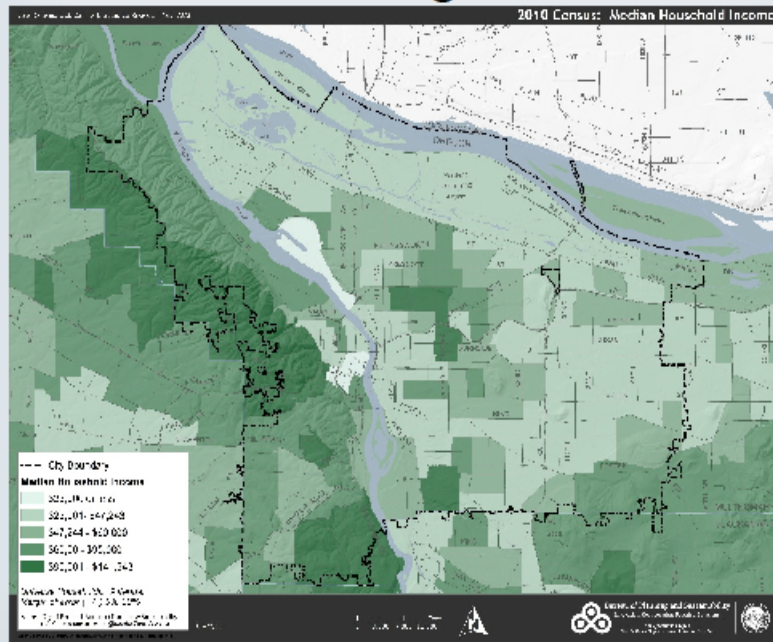


45

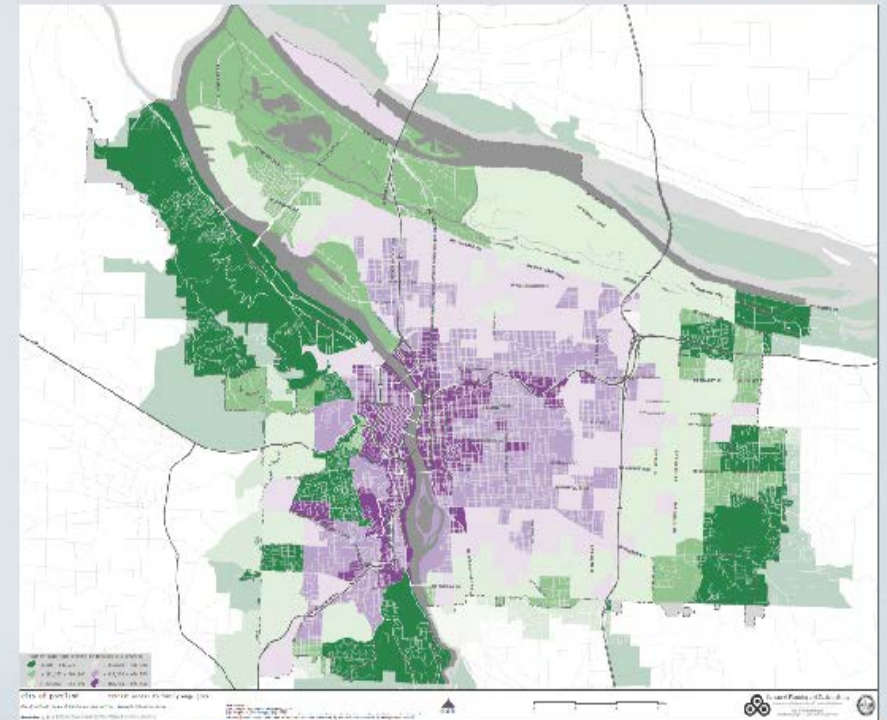
# Employment Geography Issues,

Study by Portland Bureau of Sustainability

## Affordable neighborhoods for middle-wage workers



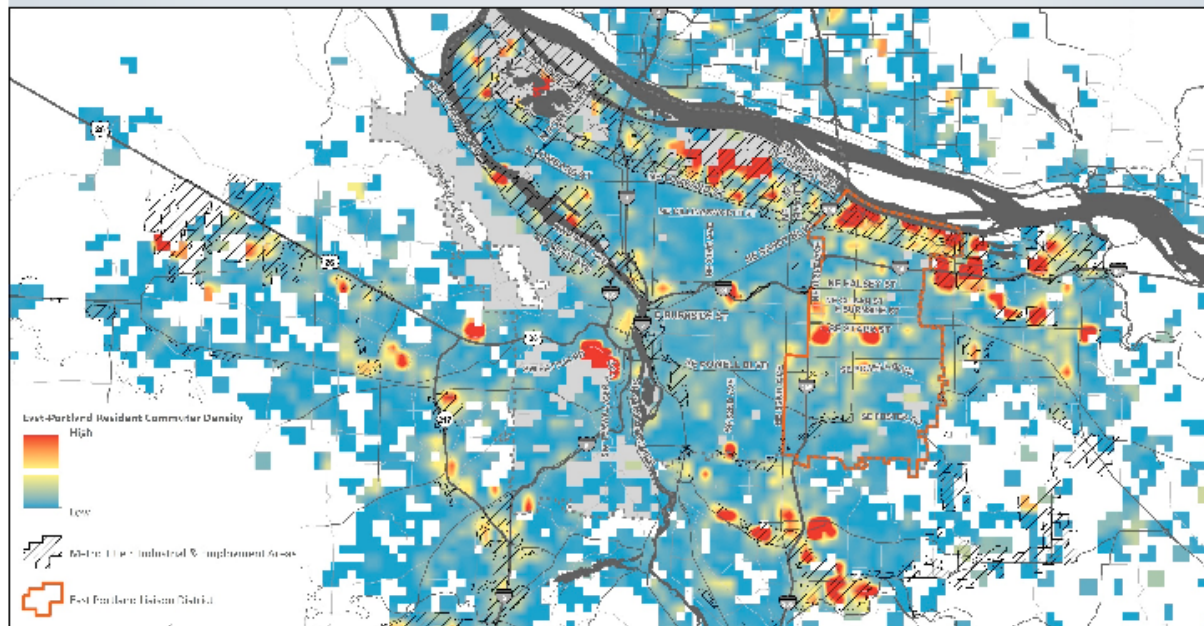
## Transit access to middle/high-wage jobs



# East Portland, where we work and live

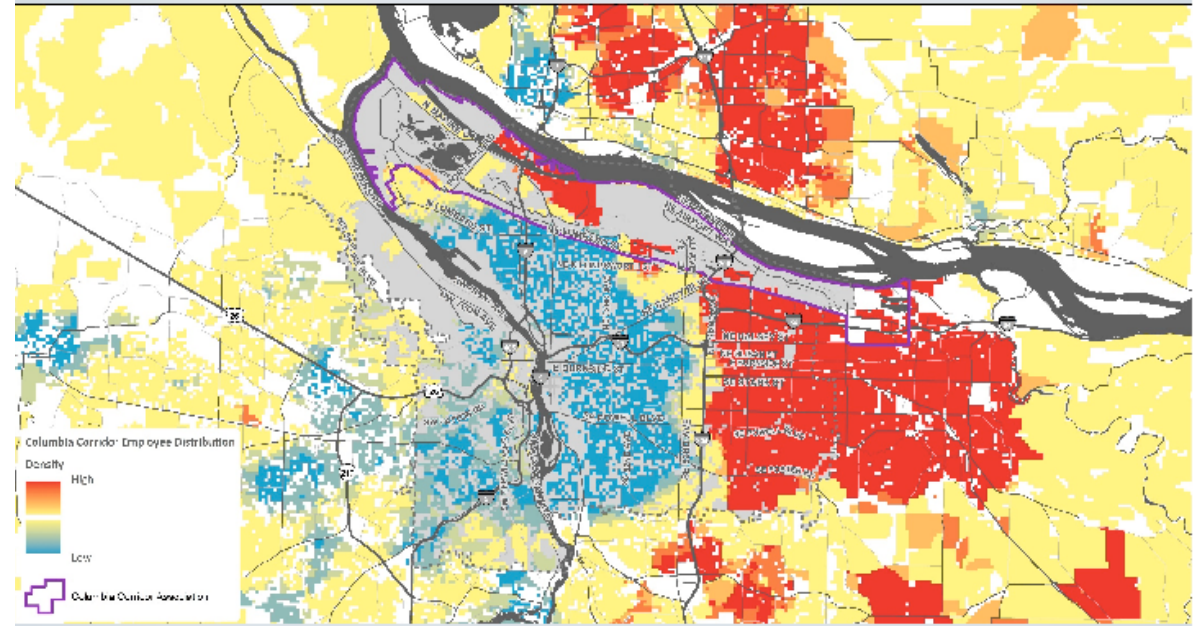
47

## Where East Portland residents work



Source: BPS from LEHD data

## Where Columbia Corridor workers live



Source: BPS from LEHD data

# Takeaways

- **Portland is a middle-class city with a balanced economy, but the share of middle-wage jobs is getting smaller.**
- **Middle-wage jobs that don't require college degrees are concentrated in industrial districts.**
- **Communities of color and East Portlanders rely disproportionately on industrial district jobs.**
- **The Comprehensive Plan Update is an opportunity to better align land use, transportation, and education with middle-wage job growth potential.**



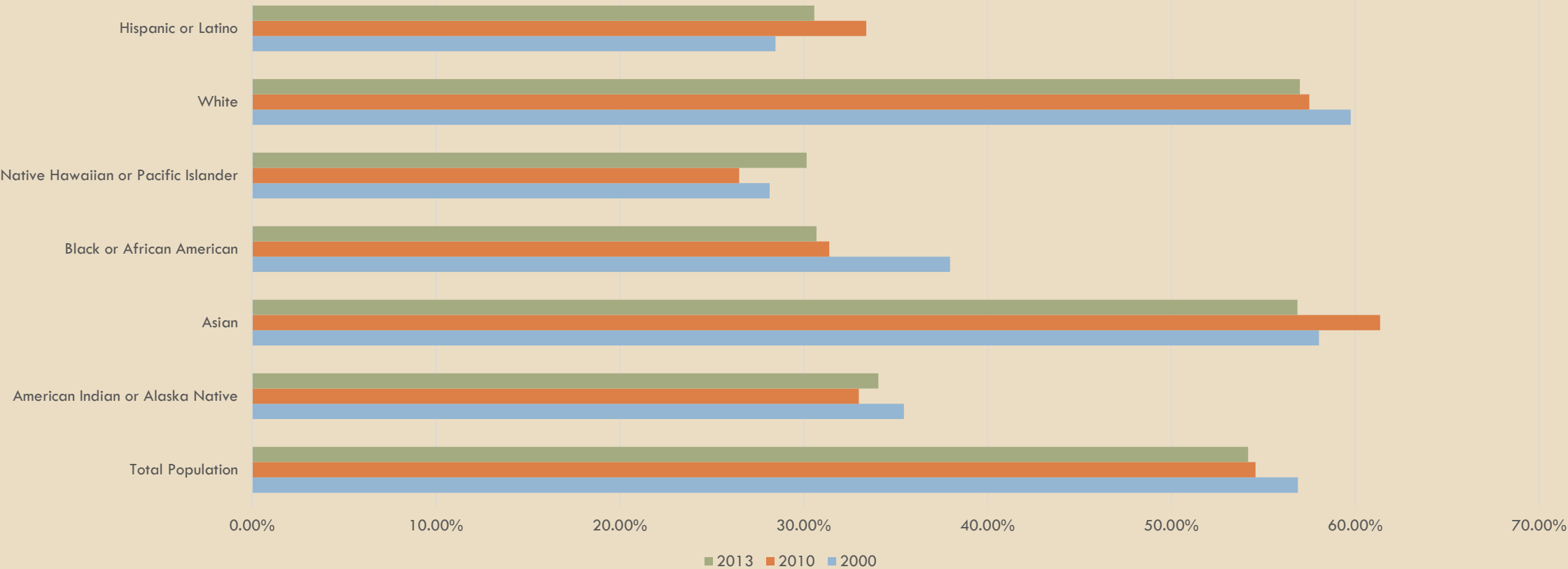


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# Homeownership in Multnomah County

# Multnomah County Homeownership Rate

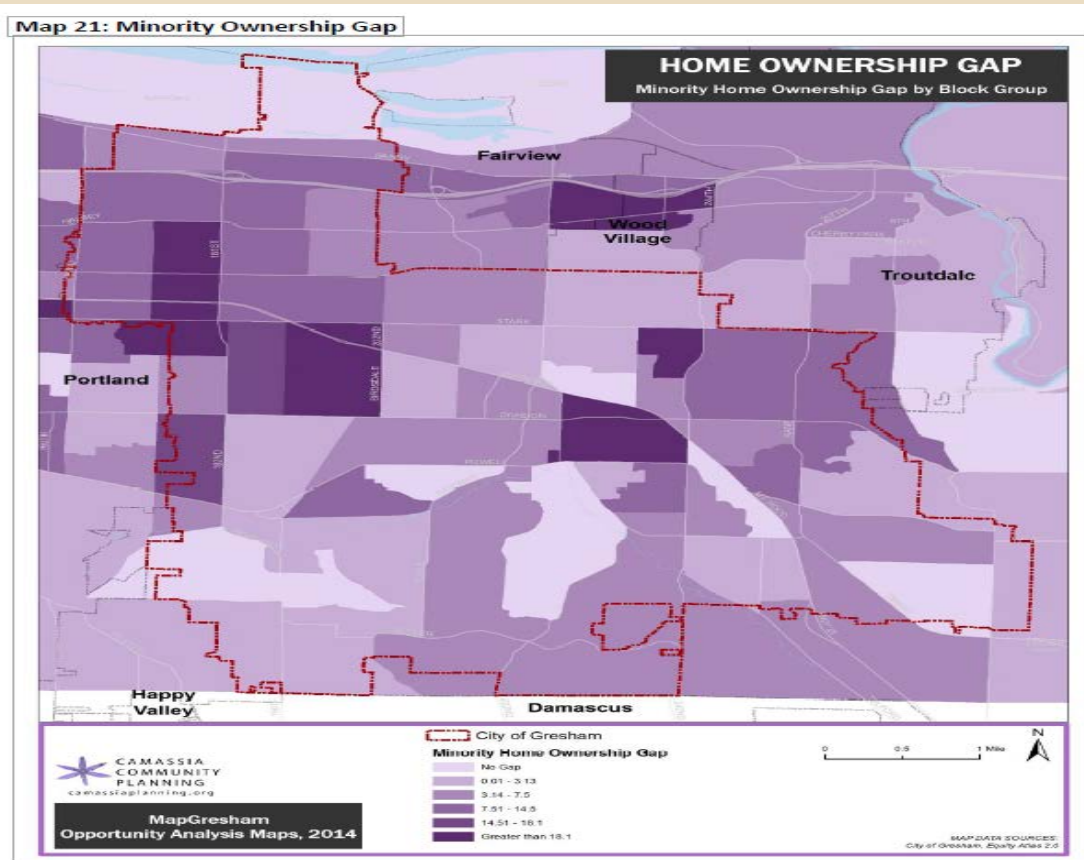
Multnomah County Homeownership Rate



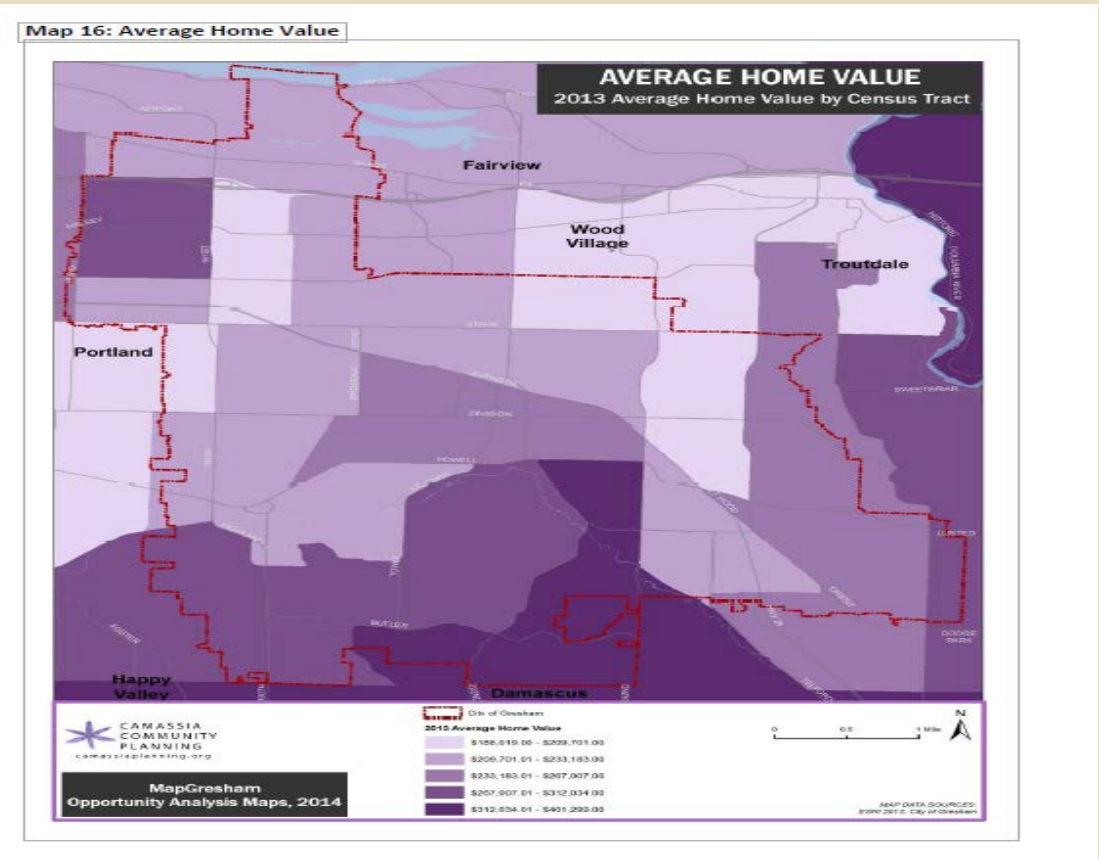
# East Multnomah County Ownership

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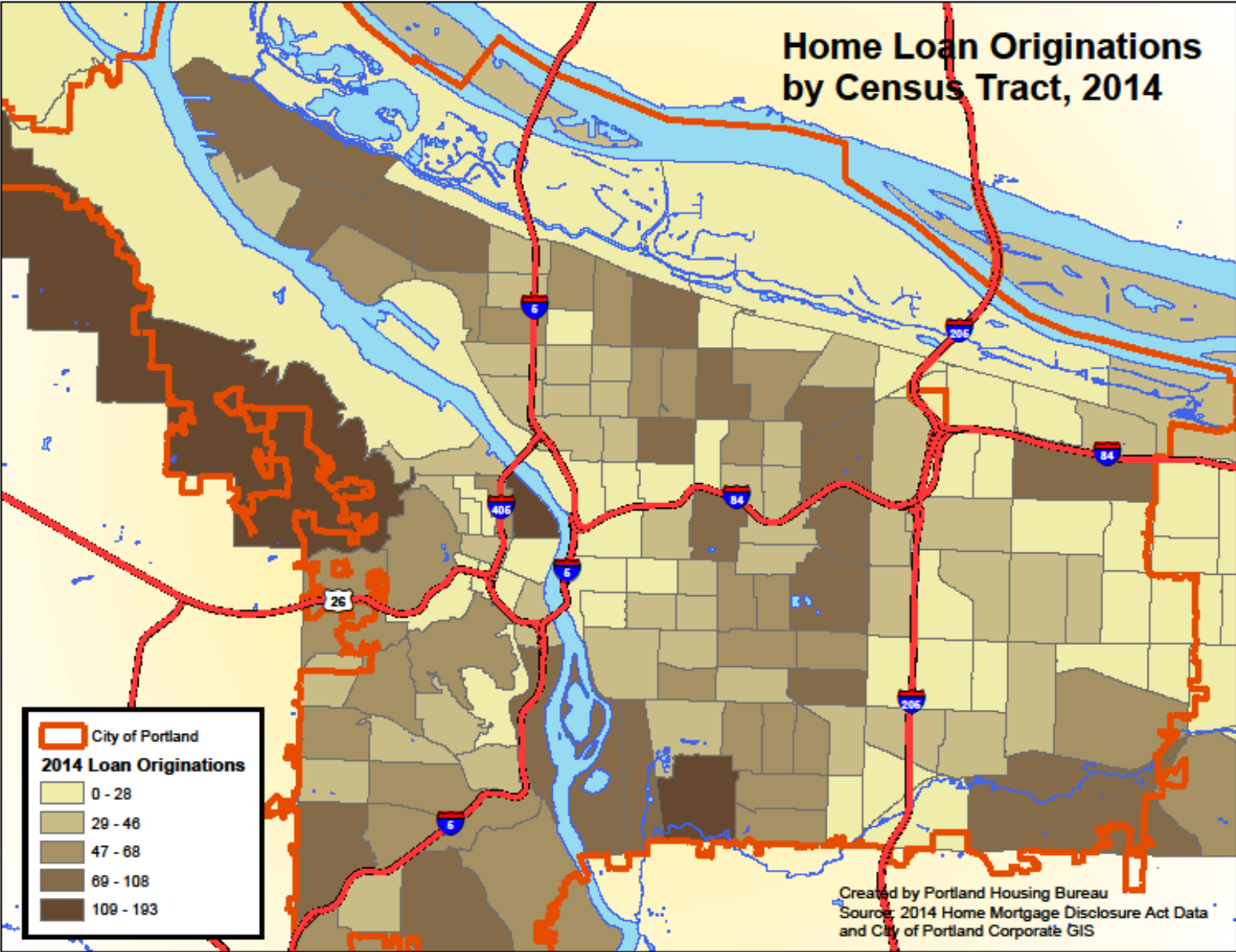
## Minority Homeownership Gap



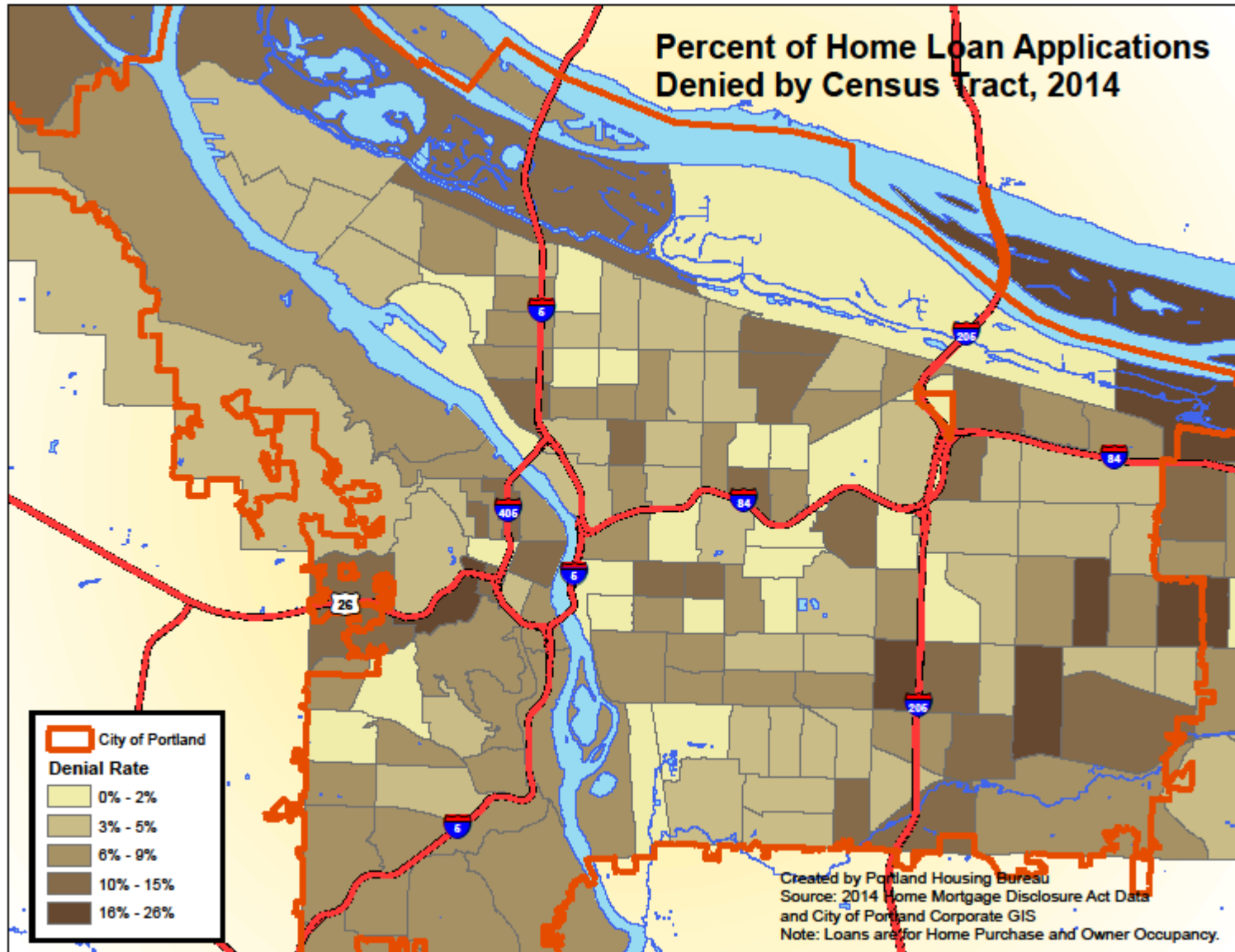
## Average Home Value



# Portland Home Loan Originations by Census Tract, 2014



# Portland Percent of Home Loan Applications Denied by Census Tract, 2014



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# Homelessness

# Case study: Disparities in homelessness among African Americans in Multnomah County

New contract with Urban League of Portland, funds two components:

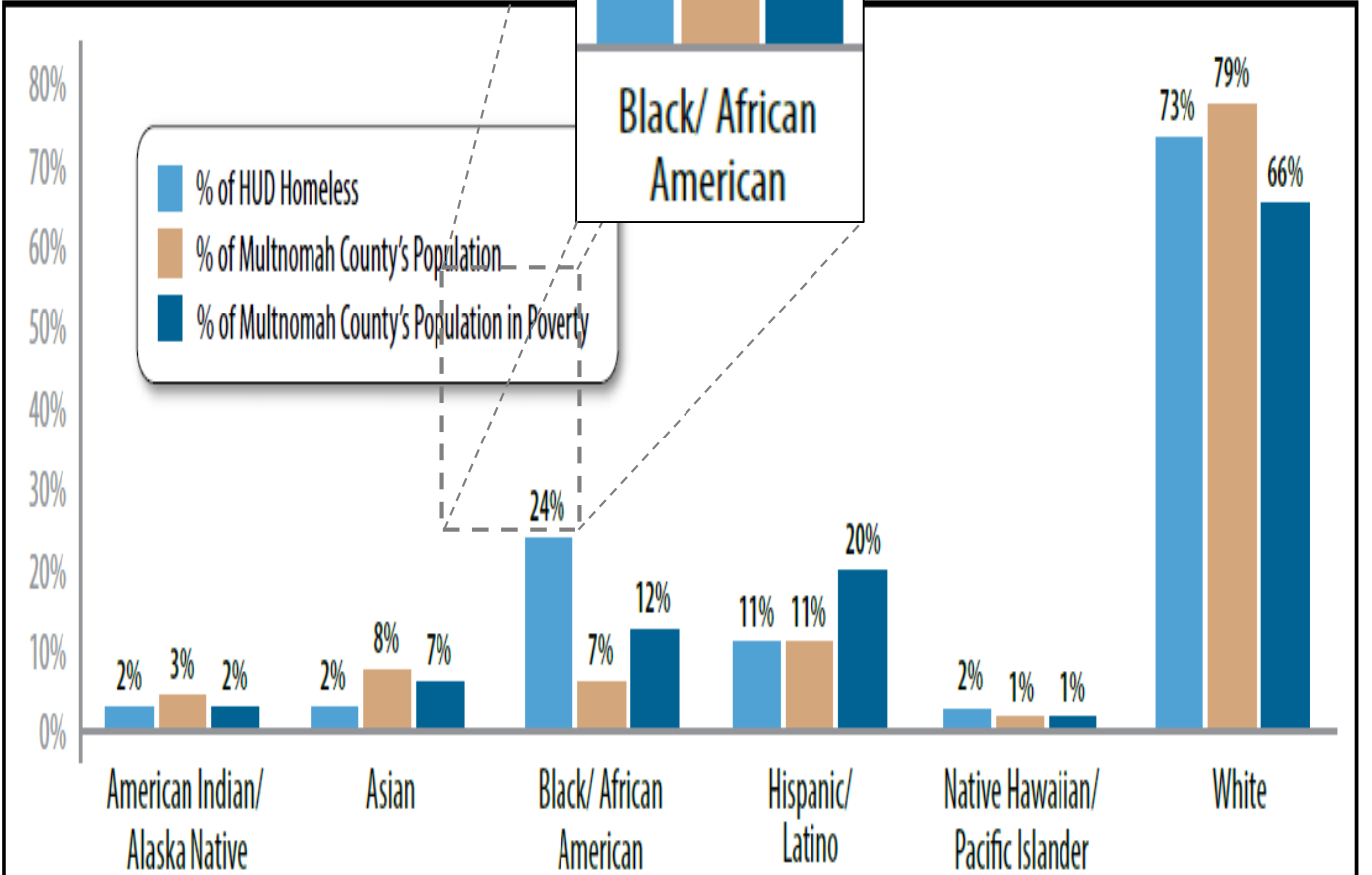
- Direct housing placement and supportive services to house 50 households

Convene planning group of African American leaders to:

- Share learning from pilot

- Assess need more broadly in community Plan for how to bring to scale through additional investment and coordination

**Racial disparities in homelessness in Multnomah County**  
(source: [2015 Point-in-time Count](#))



# Case study: Disparities in homelessness among African Americans in Multnomah County

Identified disparity through analysis of trended point-in-time count data

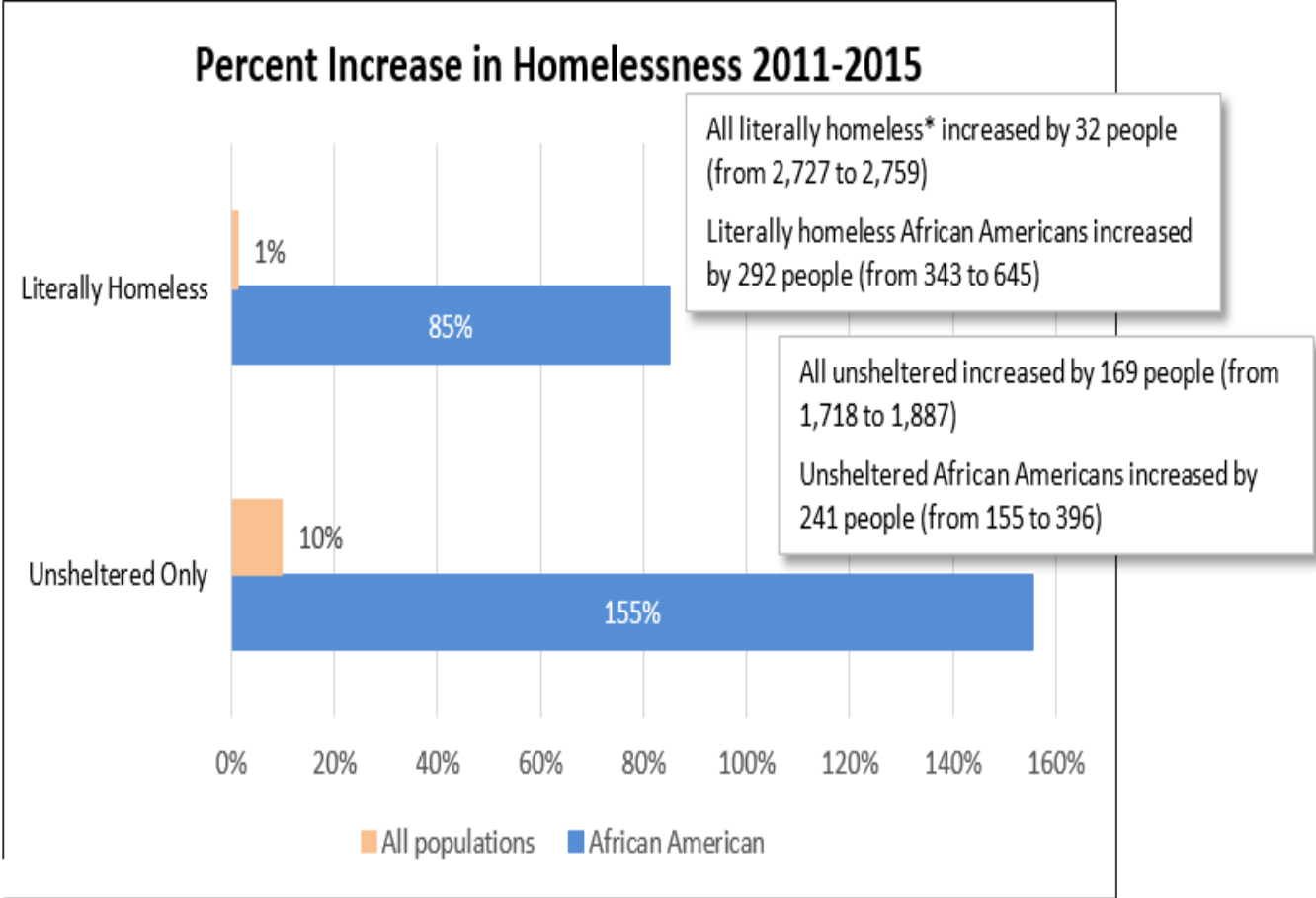
In FY13-14, 48% of people served by PHB-funded providers were people of color

In FY14-15 that increased to 58%

Beginning to address through multiple approaches:

Through equity focus in existing contracts, improve access and outcomes for people of color at “mainstream” providers

Make direct investment in culturally-specific organizations



Source: Point-in-time Count of Homelessness in Portland and Multnomah County, [2011](#), [2013](#), [2015](#)

\* “Literally homeless” refers to people who were counted and met HUD’s definition of unsheltered or in emergency shelter on the night of the point-in-time count.



# Conclusions

# Conclusions continued...

- It appears that the housing type and accommodations needed for the disabled populations are insufficient
- Discrimination on the basis of National Origin occurs
- Race based segregation is still present as measured by the diversity index
- Rapid Market forces are changing where populations live and what they have access to
- Movement of people of color to East Multnomah County appears to be not translating into higher rates of homeownership
- Homeownership rate in East Multnomah County appears to be declining
- Families with children appear to have a higher rate of “housing problems”
- Source of income appears to be a barrier to housing choice
- Limited English proficiency appears to be a barrier to housing choice
- Screening criteria may be a barrier to housing choice

# Vulnerability Index

Protected class	Vulnerability and Adverse Exposure Index				
	Poverty	Limited English Proficiency	Low wages	Exposure to toxins	Segregation
Disability	X				
National Origin	X	X	X	X	X
Race	X				
Family	X				
Domestic Violence	X				
Source of Income	X				
Sex Orientation/Gender	X				
Marital Status	X				
Religion					

# Topics for the Fair Housing Plan

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Based on conclusions from the assessment the Fair Housing plan could follow available resources in the following areas with actions specific to a vulnerable community.

- ❑ Education (Tenant and Landlord education about Fair Housing)
- ❑ Enforcement (American Disability Act building standards enforcement, Fair Housing testing etc....)
- ❑ Housing Development (three bedroom, accessible, etc. ...)
- ❑ Market Policy (screening, rent to income ratios, marketing)
- ❑ Government Policy (building incentives, resource allocations, density bonus, anti-displacement tools)
- ❑ Intergovernmental Cooperation (economic, transportation, service enhancements in areas of reduced opportunity.)



# Fair Housing & Consolidated Plan PHB Budget

Description	Recipient	15/16 Base
<b>Tenant Education</b>	Community Alliance of Tenants	\$ 151,000
<b>Relocation</b>	Community Alliance of Tenants	\$ 10,100
<b>Relocation</b>	Impact NW	\$ 120,000
<b>FH Education and Hotline and Fair Housing Ad Campaign</b>	Fair Housing Council of Oregon	\$ 42,800
<b>Fair Housing Legal Services</b>	Legal Aid Services of Oregon	\$ 47,800
<b>Fair Housing Enforcement and Testing</b>	Fair Housing Center of Washington/ FHCO	\$ 25,800
<b>Citizen Involvement</b>	Oregon ON	\$ 37,500
<b>Con Plan, Action Plan, Analysis of Impediments &amp; Fair Housing Campaign</b>		\$ 30,200
<b>TOTALS</b>		\$ 465,200

# Sources

64

- Findings of the Portland Housing Growth and Opportunity Analysis
- 2014 Multnomah County Poverty Study
- City of Gresham Opportunity Analysis
- Federal Reserve San Francisco Community Data Profile for Multnomah County
- Bureau of Planning and Sustainability
- Fair Housing Council of Oregon
- Community Alliance of Tenants
- Legal Aid Services of Oregon
- Fair Housing Council of Oregon video <https://vimeo.com/142287575>