



Portland Housing Bureau

Mayor Ted Wheeler • Director Shannon Callahan

Analysis of Impediments (AI) to Fair Housing Choice (FY 2020) Update Project

The City of Portland, City of Gresham, Multnomah county and Home Forward
(Portland Consortium)
September 9.2019

Background

All jurisdictions of the Portland Consortium – the City of Portland, City of Gresham, Multnomah County and Home Forward are required to certify that they will “*affirmatively further fair housing*” and complete a periodic Analysis of Impediments to Fair Housing (AI) as a part of their federal funding obligations. This process entails developing or updating an Analysis of Impediments to Fair Housing Choice (AI) and using it to identify appropriate actions for how to overcome the effects of any impediments identified by the AI in the jurisdiction’s Consolidated Plan. The AI is typically submitted to US Housing and Urban Development (HUD) prior to the submission of the Five-Year Consolidated Plan and annual action plans.

The last full AI submitted by the Portland Consortium was for the FY 2011 and the last Consolidated Plan was submitted in 2016. Regarding the AI requirement, HUD created a new process in 2016 which gave the Portland Consortium a new deadline of October 2020 to complete the AI. More recently, HUD retracted the new process, but the deadline for submitting the AI is still 2020. So, the Portland Consortium intends to complete and update the existing AI in FY 2020 which will then lead to the development of new 5-Year Consolidated Plan (FY 2021-2025) and the yearly action plans.

Project Plan

PHB staff will be leading the Fair Housing analysis on behalf of the Portland Consortium. The lead analyst will work with jurisdictional staff and the Fair Housing Advocacy Committee. The current plan is to share the draft AI with the newly convening Fair Housing Advisory Committee (FHAC) this winter. The AI will follow the updated Portland Consortium Citizen Participation Plan which would involve presentations at the community needs hearings and final public review of the report as required by HUD. The AI update will be developed with the framework of the HUD Consolidated Plan requirements and regulations (per Code of Federal Regulations 24 CFR Part 91) and eCon Planning Suite, as well as HUD Fair Housing Planning Guide.

The project will include:

- Update Planning Process
- Data gathering, review and analysis sufficient to meet HUD requirement
- Additional supplementary data analysis as needed
- Plan preparation, including draft and final versions of the Analysis of Impediments
- Potential presentations

Deliverables

- Draft and Final Versions of the Analysis of Impediments Updated
- All quantitative and qualitative data collected

Timeline

Steps and Timeline	Date
AI Project Update Planning	August 2019
Planning, Working with Jurisdictional Staff, and Data Collection	September 2019
Data Collection	October 2019
Data Analysis Community Needs Hearing	October - November 2019
<i>Review of Draft AI Data by FHAC</i>	December 2019
Report Writing	January 2020
<i>FHAC reviews draft Analysis of Impediments</i>	February - March 2020
<i>Complete Draft Plan</i>	April 2020
<i>Final Plan</i>	May 2020
30-Day Public Review as Required by HUD	June – July 2020
<i>Submission of the Final AI to HUD</i>	August 2020
Final Deadline for Submission of Analysis of Impediments to HUD	October 2020
Process Evaluation	November 2020
Next Five-Year Consolidated Plan Due	June 2021

Resources:

Analysis of Impediments to Fair Housing Choice

FY 2011 AI (<https://www.portlandoregon.gov/phb/article/653184>)

Fair Housing [Assessment Tools](#)

Fair Housing and the Consolidated Plan [tools](#)

[Fair Housing Planning Guide](#)

Consolidated Plans

FY 2011-2015 Consolidated Plan (<https://efiles.portlandoregon.gov/Record/4343123/>)

FY 2016-2020 Consolidated Plan (<https://www.portlandoregon.gov/phb/article/670036>)

City of Portland's Annual Action Plans (<https://www.portlandoregon.gov/phb/74385>)

Additional Organizational Resources:

Fair Housing Council of Oregon (www.fhco.org)

HUD's Office of Community Planning and Development (https://www.hud.gov/program_offices/comm_planning)

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