



Commissioner Nick Fish  
City of Portland

## **Portland Housing Bureau's Fair Housing Action Plan**

### **INTRODUCTION**

#### **1. Our Values**

The City of Portland is dedicated to removing barriers to housing choice in our community. We believe our city, county, and state are strongest when everyone has equal access to a safe, affordable place to call home.

Working with our partners, we are committed to enforcing the federal, state and local fair housing laws that prohibit discrimination based on a person's race, color, national origin, religion, sex, sexual orientation, source of income, familial status, marital status, military status, and physical or mental disability. In addition to enforcing fair housing laws, the City and its partners will work to address practices, programs, and behaviors that have the *effect* of restricting housing choice for protected classes.

#### **2. Analysis of Impediments**

Every five years, the City of Portland is required to submit an Analysis of Impediments to Fair Housing Choice to the United States Department of Housing and Urban Development (HUD).

In 2010, we established an Analysis of Impediments Review Committee comprised of housing providers, community advocates, and civil rights leaders to advise the Portland Housing Bureau (PHB) on its report to HUD.

The demographic trends, community testimony and complaint data in the Analysis of Impediments Report showed there are still serious fair housing concerns to be addressed.

The complete Analysis of Impediments report was submitted to HUD on June 17, 2011 and is available online for viewing at [www.portlandonline.com/phb/fairhousing](http://www.portlandonline.com/phb/fairhousing).

### **3. The Action Plan**

This Action Plan sets forth the specific actions the City of Portland, through the Portland Housing Bureau, will take in 2011-12 as the first set of bold steps over the next five years to end discrimination in rental housing. It builds on the visionary work of the Analysis of Impediments Review Committee, and provides a comprehensive approach – blending enforcement, education, and increased access to affordable homes and services.

The City of Portland will hold itself and its partners accountable for these outcomes and will monitor the actions set forth in this Plan, and report annually on our results. A sample report can be found at the end of this Plan as *Exhibit A*.

## **ACTION PLAN**

### **I. End Discrimination In Rental Housing**

*1. Work with partners to secure County-wide funding and support to continue and enhance enforcement of fair housing laws.<sup>1</sup>*

#### Action Steps:

- A. Work with the Civil Rights Division of the Oregon Bureau of Labor and Industries (BOLI) to ensure that discrimination complaints are appropriately addressed.
- B. Work with the Fair Housing Council of Oregon and Legal Aid Services of Oregon (LASO) and BOLI to streamline the intake and referral process for Fair Housing cases for low-income people.

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<sup>1</sup> Select recommendations of the Analysis of Impediments Review Committee are referenced throughout this report in italics.

- C. Determine feasibility of moving to a single point of intake for Fair Housing cases, resulting in LASO's increased ability to screen cases and refer complaints to enforcement agencies.
- D. Convene and actively participate in regular meetings with BOLI, HUD, the United States Attorney, and the Oregon Department of Justice to better coordinate enforcement of our Fair Housing laws.

**Outcome:** Better coordinated enforcement will increase the number of litigated Fair Housing cases referred by PHB contractors by the end of the June 2012

*2. Work with partners to secure County-wide funding and support to continue and enhance the education of fair housing laws.*

Action Steps:

- A. Work with Home Forward and the Fair Housing Council of Oregon to increase Fair Housing education for tenants and landlords.
- B. Work with the Community Alliance of Tenants (CAT) and 211Info to improve coordinated information and referral for people experiencing housing discrimination.

In PHB contracts, require targeted outreach and educational information sessions for culturally specific community partners representing protected classes and demonstrate an increase in the number of tenants who have been educated about Fair Housing information by June 30, 2012.

- C. Work with Metro Multifamily Housing Association, the Rental Housing Association of Greater Portland, Oregon Opportunity Network, Home Forward and the Fair Housing Council of Oregon to increase Fair Housing education for tenants and landlords.

Outcome: The increased investment in Fair Housing-specific training to landlords as part of membership in each association will result in a quantifiable increase in training opportunities by the end of the fiscal year.

3. *Conduct audit testing to determine discrimination trends and issues for Protected Classes seeking housing, with special focus on homeownership and affordable rental units.*

Action Steps:

- A. Contract annually with a HUD-approved agency to conduct Fair Housing testing. At least annually, the newly-formed Fair Housing Advocacy Committee will review the results and release them to the public.

Outcome: Reliable and independent information about possible fair housing violation trends in rental and ownership housing.

4. *Partner with housing providers to modify screening and credit criteria that have an inadvertently higher impact on protected classes, especially persons of differing national origin and women experiencing domestic violence.*

Action Steps:

- A. Work with property owners in the City's affordable housing portfolio to review and modify screening criteria to increase access to affordable housing units by protected classes. The City will link housing seekers to Rent Well (as a way to mitigate screening barriers) as well as Housing Connections, an affirmative outreach tool to low-income renters, including people in protected classes.

Oregon Opportunity Network will lead a review by members and other affordable property owners of screening criteria to develop modified criteria and educate members about their use.

Outcome: A coordinated effort with buy-in from multiple interests.

## **II. Create A Fair Housing Advocacy Committee**

1. *Work with partners to create a fair housing advocacy committee that meets on an at least quarterly basis to focus on fair housing issues and to be a strong advocate voice for Multnomah County. Committee needs a clear,*

*focused champion in a strong leadership and decision-making position, as well as a diverse representative membership.*

Action Steps:

- A. Work with jurisdictional partners to form a permanent county-wide Fair Housing Advocacy Committee.

Confer with partners to select and confirm committee members by no later than September 30, 2011 and provide them with clear roles and responsibilities.

The Committee will report to the City of Portland, the City of Gresham, and Multnomah County. It will be charged with reviewing annual data and progress made by the City of Portland and its partners under this Plan.

- B. The Advocacy Committee will be responsible for oversight of the City of Portland's implementation of this Action Plan, and will create a county-wide work plan that reflects the action steps to be taken by all jurisdictional partners to carry out the recommendations included in the Analysis of Impediments to Fair Housing Choice report submitted to HUD.

Outcome: The Action Plan will have a diverse set of champions to hold the implementing agencies accountable and to revise the Action Plan as needed.

### **III. Strengthen Public Awareness Of Fair Housing Laws**

*1. Partner with landlord trade associations and other community organizations to ensure frequent and accurate trainings for property managers, owners, regulators and social service providers to understand Fair Housing law and reasonable accommodations and modifications.*

Action Steps:

- A. Work with Metro Multifamily Housing Association, Oregon Opportunity Network, Home Forward and the Fair Housing Council of Oregon to increase Fair Housing education for landlords.

Outcome: The increased investment in Fair Housing-specific training to landlords as part of membership in each association will result in a quantifiable increase in training opportunities by the end of the fiscal year.

- B. Actively participate in regular meetings with BOLI, HUD, the United States Attorney, and the Oregon Department of Justice to better coordinate enforcement and education of Fair Housing laws.

Outcome: Better coordinated enforcement and education will increase the number of litigated Fair Housing cases referred by PHB contractors by the end of the June 2012.

*2. Work with partners to secure resources for a public information campaign about Fair Housing rights and current issues to change attitudes, practices and public policies, using culturally and linguistically appropriate methods to reach all members of the public.*

Action Steps:

- A. Work with jurisdictional partners and the Fair Housing Advocacy Committee to launch a public information campaign no later than December 31, 2012.

Outcome: Support from Commissioner Fish and partners will result in increased public and private funds in support of the campaign.

#### **IV. Improve Access To Housing Opportunity**

*1. Develop opportunity mapping as a foundation of housing policy development to illustrate areas of Multnomah County where there is limited access to opportunity and transportation. Commit resources including transportation resources to these areas to increase opportunity and equity, and tie the mapping into the update of Portland's Location Policy.*

Action Steps:

- A. Develop a Citywide Housing Strategy. Opportunity Mapping will be a primary tool used to inform the housing strategy.

PHB and the Bureau of Planning and Sustainability will identify key partners, data and the methodology for mapping no later than December 31, 2011. Maps to be completed in 2012 will inform budget prioritization and for the City's Comprehensive Plan update.

Outcome: Actions will be based on the best available data and jurisdictions will have the same point of reference.

**V. Expand Fair Housing Testing**

*1. Work with partners and the Fair Housing Advocacy Committee to design and secure funding for audit testing for all areas of the county using the most expanded list of protected classes to determine trends and issues of discrimination.*

Action Steps:

- A. Contract annually with a HUD-approved agency to conduct Fair Housing testing. Each year the Fair Housing Advocacy Committee will review the results and release them to the public.
- B. Direct the contracted agency to expand audit testing to include all protected classes to determine trends and issues of discrimination in aid of enforcement and litigation. The Fair Housing Advocacy Committee will oversee all testing.

Outcome: Reliable information about discrimination trends and issues.

**VI. Expand The Supply Of Accessible, Affordable Homes**

*1. Increase the number of affordable/accessible housing choices for all household sizes, especially family-sized housing with three or more bedrooms.*

Action Steps:

- A. Provide federal and local funding in support of development and preservation of affordable housing. Funding will increase the number of units in the City's affordable housing portfolio.
- B. Work with housing providers to track the current utilization by protected classes of family sized units in the City's affordable housing portfolio and develop strategies to increase access and utilization by protected classes.

Outcome: Increasing housing choices will result in an increased number of family-sized units in the City's affordable housing portfolio by FY 2012-13. Data will be reported the Fair Housing Advocacy Committee.

**VII. Address And Mitigate The Unintended Consequences Of Gentrification**

*1. Make public investments that mitigate the effects of displacement and that encourage diversity through mechanisms including, but not limited to, "community agreements," housing development linked to schools/transportation/employment, mixed income housing, and rental assistance tied to market rate units.*

Action Steps:

- A. PHB is committed to strategically investing in programs and services to address disparities and the unintended displacement caused by public investment in redeveloping neighborhoods.

PHB has begun tracking the utilization of its housing programs by communities of color and has published those results. The reports showed disparities in access to housing and housing services for these communities. This data will be used to develop specific targets for improved access for those communities from FY 2009-10 levels.

Outcome: Working with our partners, we will continue to develop strategies to increase utilization of programs by protected classes.



This will result in quantifiably increased utilization of reported programs by the end of the 2011-12 fiscal year.

2. *Encourage the renewal of the Portland 30% Tax Increment Funding Policy affordable housing set-aside.*

Action Steps:

- A. PHB and Commissioner Fish will continue to advocate for renewal and strict compliance with the 30% TIF Set-Aside policy.
- B. The 30% TIF Set-Aside policy is currently under review. A public stakeholder committee is developing recommendations to improve the policy. Information about the review process can be found online: [www.portlandonline.com/phb/tif](http://www.portlandonline.com/phb/tif).

3. *Focus on resource development to acquire funding outside of Urban Renewal Areas to develop and preserve affordable/accessible housing in all areas of the County.*

Action Steps:

- A. PHB, the County, Commissioner Fish, and stakeholders will work together to identify new sustainable funding sources for affordable housing.

**VIII. Increase Funding For Safety-Net Programs For Low-Income And Vulnerable Populations**

1. *Continue, and consider increasing funding for, Rent Assistance for low income residents.*

Action Steps:

- A. Secure \$1.9 million in City of Portland general funds to support short term rent assistance in FY11-12 (complete.)

- B. Work with Multnomah County, Gresham, and Home Forward to secure continued funding for short-term rent assistance and other programs that prevent homelessness and support rapid re-housing.

*2. Increase funding for social services known to assist in stabilizing households, including but not limited to addiction services, childcare, employment assistance, and other support services.*

Action Steps:

- A. PHB and its jurisdictional partners will advocate for increased resources for supportive services that assist people to achieve stable housing.

*3. Continue funding development of subsidized, accessible housing units for individuals and families below 30% MFI, working to increase the number of units available to meet the demand. Develop subsidies or other incentives to encourage private landlords to rent to low-income individuals at little to no risk to them.*

Action Steps:

- A. Provide federal and local funding in support of the development and preservation of affordable housing. Funding will increase the number of units in the City's affordable housing portfolio.

## CONCLUSION

We will not tolerate discrimination in housing in Portland – but we will not eliminate housing discrimination overnight. It will take persistence, collaboration, and creativity.

The City of Portland and its partners will regularly review the Action Plan and the recommendations in the Analysis of Impediments to Fair Housing Choice report to identify additional actions or steps needed to keep moving the Fair Housing agenda forward over the next five years.

We commit to be bold in our actions and accountable for results.

Thanks to the Analysis of Impediments Review Committee for its groundbreaking work, our partners for joining us in this effort, and the team at PHB for their remarkable public service.

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Nick Fish  
Commissioner

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Margaret Van Vliet  
Director

## **EXHIBIT A: SAMPLE REPORT**

### **OUTCOME AND REPORTING DATA**

**REPORTING PERIOD FROM: JULY 1, 2011 To: JUNE 30, 2012**

### **BENEFICIARY DATA**

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LOW/MODERATE INCOME BENEFIT.

List total number of clients receiving services through your program as well as the breakdowns listed.

| <b>PARTICIPANT INFORMATION</b> | <b>Total for Reporting Period</b> | <b>YTD*</b> |
|--------------------------------|-----------------------------------|-------------|
| No. of individuals             |                                   |             |

| <b>1. GENDER</b> | <b>Total for Reporting Period</b> | <b>YTD*</b> |
|------------------|-----------------------------------|-------------|
| Male             |                                   |             |
| Female           |                                   |             |
| <b>Total</b>     |                                   |             |

| <b>2. RACE</b>                                     | <b>Total for Reporting Period</b> | <b>Total for Reporting Period</b> | <b>YTD*</b>     | <b>YTD*</b>         |
|----------------------------------------------------|-----------------------------------|-----------------------------------|-----------------|---------------------|
| <b>Ethnicity</b>                                   | <b>Hispanic</b>                   | <b>Non Hispanic</b>               | <b>Hispanic</b> | <b>Non Hispanic</b> |
| White                                              |                                   |                                   |                 |                     |
| Black/African American                             |                                   |                                   |                 |                     |
| Asian                                              |                                   |                                   |                 |                     |
| American Indian/Alaskan Native                     |                                   |                                   |                 |                     |
| Native Hawaiian/Other Pacific Islander             |                                   |                                   |                 |                     |
| American Indian/Alaskan Native & White             |                                   |                                   |                 |                     |
| Asian & White                                      |                                   |                                   |                 |                     |
| Black/African American & White                     |                                   |                                   |                 |                     |
| Am. Indian/Alaskan Native & Black/African American |                                   |                                   |                 |                     |
| Other                                              |                                   |                                   |                 |                     |
| <b>Total*</b>                                      |                                   |                                   |                 |                     |

\*YTD - Year to date including current reporting period

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**BENEFICIARY DATA**

| <b>3. INCOME (Required)</b>       | <b>Total for Reporting Period</b> | <b>YTD*</b> |
|-----------------------------------|-----------------------------------|-------------|
| Over 80% of M.I.                  |                                   |             |
| (Moderate Income) 51%-80% of M.I. |                                   |             |
| (Low) 31%-50% of M.I.             |                                   |             |
| (Extremely Low) 0-30% of M.I.     |                                   |             |
| Total Low/Moderate Income         |                                   |             |
| <b>Total Income*</b>              |                                   |             |

\*\*\*Total income should add up to the total people served.

| <b>4. RESIDENCE</b> | <b>Total for Reporting Period</b> | <b>YTD*</b> |
|---------------------|-----------------------------------|-------------|
| NE Portland         |                                   |             |
| SE Portland         |                                   |             |
| NW Portland         |                                   |             |
| SW Portland         |                                   |             |
| N Portland          |                                   |             |
| <b>Total</b>        |                                   |             |

| <b>5. LOCATION OF VIOLATION</b> | <b>Total for Reporting Period</b> | <b>YTD*</b> |
|---------------------------------|-----------------------------------|-------------|
| NE Portland                     |                                   |             |
| SE Portland                     |                                   |             |
| NW Portland                     |                                   |             |
| SW Portland                     |                                   |             |
| N Portland                      |                                   |             |
| <b>Total</b>                    |                                   |             |

| <b>6. OTHER</b>                     | <b>Total for Reporting Period</b> | <b>YTD*</b> |
|-------------------------------------|-----------------------------------|-------------|
| Female Head of Household (Required) |                                   |             |
| Elderly Head of Household (Over 65) |                                   |             |
| Disabled/Special Needs              |                                   |             |
| <b>Total</b>                        |                                   |             |

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**Project Quarterly Report**  
**OUTCOME AND REPORTING DATA**  
**REPORTING PERIOD FROM: JULY 1, 2011 To: JUNE 30, 2012**

| PARTICIPANT INFORMATION | Goal | Q1 | Q2 | Q3 | Q4 | Y-T-D |
|-------------------------|------|----|----|----|----|-------|
|-------------------------|------|----|----|----|----|-------|

1. Performance Measures

|                                                                      |    |  |  |  |  |  |
|----------------------------------------------------------------------|----|--|--|--|--|--|
| Total Cases<br>(Output goal is XX households served<br>for the year) |    |  |  |  |  |  |
| Cases w/ sufficient evidence of<br>discrimination                    | NA |  |  |  |  |  |
| Cases with in-depth interview                                        | NA |  |  |  |  |  |
| Cases which proceed until<br>process over                            | NA |  |  |  |  |  |

2. Cases with Sufficient Evidence

|                                       |     |  |  |  |  |  |
|---------------------------------------|-----|--|--|--|--|--|
| Successful Negotiation/<br>Litigation | 80% |  |  |  |  |  |
| Refer to HUD (monitoring)             | NA  |  |  |  |  |  |
| Refer to BOLI (monitoring)            | NA  |  |  |  |  |  |
| Total*                                |     |  |  |  |  |  |

3. Cases Without Sufficient Evidence (Insufficient or No Merit)

|                                |    |  |  |  |  |  |
|--------------------------------|----|--|--|--|--|--|
| Refer to HUD (not monitoring)  | NA |  |  |  |  |  |
| No merit After Investigation   | NA |  |  |  |  |  |
| Refer to BOLI (not monitoring) | NA |  |  |  |  |  |
| Total*                         |    |  |  |  |  |  |

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**Project Quarterly Report**  
**OUTCOME AND REPORTING DATA**  
**REPORTING PERIOD FROM: JULY 1, 2011 To: JUNE 30, 2012**

| <b>PARTICIPANT INFORMATION</b> | <b>Baseline</b> | <b>Q1</b> | <b>Q2</b> | <b>Q3</b> | <b>Q4</b> | <b>YTD</b> |
|--------------------------------|-----------------|-----------|-----------|-----------|-----------|------------|
|--------------------------------|-----------------|-----------|-----------|-----------|-----------|------------|

**4. Other Case Outcomes**

|                                                 |    |  |  |  |  |  |
|-------------------------------------------------|----|--|--|--|--|--|
| Client withdrew/failed to respond after invest. | NA |  |  |  |  |  |
| Client failed to appear for int. after intake   | NA |  |  |  |  |  |
| Still Investigating                             | NA |  |  |  |  |  |
| Referral (not fair housing)                     | NA |  |  |  |  |  |
| Advice Only                                     | NA |  |  |  |  |  |
| Total*                                          |    |  |  |  |  |  |

**5. Referrals**

|      |    |  |  |  |  |  |
|------|----|--|--|--|--|--|
| FHCO | NA |  |  |  |  |  |
| LASO | NA |  |  |  |  |  |

Totals in boxes 2, 3, and 4 should be equal to the number of cases.

**6. Basis of Complaint**

|                          | <b>Baseline</b> | <b>Q1</b> | <b>Q2</b> | <b>Q3</b> | <b>Q4</b> | <b>Y-T-D</b> |
|--------------------------|-----------------|-----------|-----------|-----------|-----------|--------------|
| Race/color               |                 |           |           |           |           |              |
| National Origin          |                 |           |           |           |           |              |
| Family Status            |                 |           |           |           |           |              |
| Religion                 |                 |           |           |           |           |              |
| Gender/Sex               |                 |           |           |           |           |              |
| Mental Disability        |                 |           |           |           |           |              |
| Physical Disability      |                 |           |           |           |           |              |
| Marital Status           |                 |           |           |           |           |              |
| Source of Income         |                 |           |           |           |           |              |
| Age                      |                 |           |           |           |           |              |
| Sex- Gender              |                 |           |           |           |           |              |
| Sex- Harassment          |                 |           |           |           |           |              |
| Sex- Orientation         |                 |           |           |           |           |              |
| Military Status          |                 |           |           |           |           |              |
| Domestic Violence Status |                 |           |           |           |           |              |
| Retaliation              |                 |           |           |           |           |              |
| OTHER                    |                 |           |           |           |           |              |

| PARTICIPANT INFORMATION | Prior Year | Q1 | Q2 | Q3 | Q4 | Y-T-D |
|-------------------------|------------|----|----|----|----|-------|
|-------------------------|------------|----|----|----|----|-------|

## 7. Alleged Act:

|                                       |  |  |  |  |  |  |
|---------------------------------------|--|--|--|--|--|--|
| Refusal to Rent/Admissions            |  |  |  |  |  |  |
| Eviction                              |  |  |  |  |  |  |
| Reasonable Accommodation              |  |  |  |  |  |  |
| Disparate Treatment rent              |  |  |  |  |  |  |
| Design/Construction                   |  |  |  |  |  |  |
| Redlining                             |  |  |  |  |  |  |
| Illegal Ad                            |  |  |  |  |  |  |
| Refusal to Sell                       |  |  |  |  |  |  |
| Refusal to Permit                     |  |  |  |  |  |  |
| Steering                              |  |  |  |  |  |  |
| Disparate treatment credit            |  |  |  |  |  |  |
| Harassment/ Discriminatory Statements |  |  |  |  |  |  |
| OTHER                                 |  |  |  |  |  |  |

List **OTHER** here:

## 8. Intake and Referral Outcomes

|                                                                       | Prior Year | Q1 | Q2 | Q3 | Q4 | Y-T-D |
|-----------------------------------------------------------------------|------------|----|----|----|----|-------|
| # of Portland advocacy agencies that receive Fair Housing information |            |    |    |    |    |       |
| # of calls screened from Portland citizens                            |            |    |    |    |    |       |
| # of calls screened from Portland citizens related to fair housing    |            |    |    |    |    |       |
| # of intakes of bona fide allegations                                 |            |    |    |    |    |       |
| # of expected referrals                                               |            |    |    |    |    |       |



## 9. Intake Advocacy

|                                                                | Goal     | Q1 | Q2 | Q3 | Q4 | Y-T-D |
|----------------------------------------------------------------|----------|----|----|----|----|-------|
| # of reasonable accommodation assists                          |          |    |    |    |    |       |
| Percent of all favorable cases                                 | 80%      |    |    |    |    |       |
| # of reasonable accommodation clients with favorable outcomes. |          |    |    |    |    |       |
| Number of cases litigated                                      | increase |    |    |    |    |       |
| Number of underrepresented intakes                             | increase |    |    |    |    |       |

## 10. Fair Housing Education

| Fair Housing Education                                         | Goal       | Q1 | Q2 | Q3 | Q4 | Y-T-D |
|----------------------------------------------------------------|------------|----|----|----|----|-------|
| Number of education events to present fair housing information | 4 meetings |    |    |    |    |       |
| Other                                                          |            |    |    |    |    |       |

## 11. Fair Housing Advocacy Committee

|                                                    | Goal       | Q1 | Q2 | Q3 | Q4 | Y-T-D |
|----------------------------------------------------|------------|----|----|----|----|-------|
| Number of Fair Housing Advocacy Committee Meetings | 4 meetings |    |    |    |    |       |
|                                                    |            |    |    |    |    |       |

## 12. Fair Housing Campaign

|                                                                   | Goal      | Q1 | Q2 | Q3 | Q4 | Y-T-D |
|-------------------------------------------------------------------|-----------|----|----|----|----|-------|
| # of Culturally Specific Groups Contacted                         | 10 groups |    |    |    |    |       |
| Survey shows % increase in Fair Housing Awareness                 | increase  |    |    |    |    |       |
| Increase in number of calls from members of each protected class. |           |    |    |    |    |       |

Final Year To Date Data

|                                        | Race/colo | National | Family | Religion | Mental | Physical | Marital | Source of | Age | Sex | Gender | Sex | Harassme | Sex | Orientation | Sex- | Military | Retaliatio | YTD |
|----------------------------------------|-----------|----------|--------|----------|--------|----------|---------|-----------|-----|-----|--------|-----|----------|-----|-------------|------|----------|------------|-----|
| Refusal to Rent/Admissi ons            |           |          |        |          |        |          |         |           |     |     |        |     |          |     |             |      |          |            |     |
| Eviction                               |           |          |        |          |        |          |         |           |     |     |        |     |          |     |             |      |          |            |     |
| Reasonable Accommodat ion              |           |          |        |          |        |          |         |           |     |     |        |     |          |     |             |      |          |            |     |
| Disparate Treatment Rent               |           |          |        |          |        |          |         |           |     |     |        |     |          |     |             |      |          |            |     |
| Design/Const ruction                   |           |          |        |          |        |          |         |           |     |     |        |     |          |     |             |      |          |            |     |
| Redlining                              |           |          |        |          |        |          |         |           |     |     |        |     |          |     |             |      |          |            |     |
| Illegal Ad                             |           |          |        |          |        |          |         |           |     |     |        |     |          |     |             |      |          |            |     |
| Refusal to Sell                        |           |          |        |          |        |          |         |           |     |     |        |     |          |     |             |      |          |            |     |
| Refusal to Permit                      |           |          |        |          |        |          |         |           |     |     |        |     |          |     |             |      |          |            |     |
| Steering                               |           |          |        |          |        |          |         |           |     |     |        |     |          |     |             |      |          |            |     |
| Disparate treatment Credit             |           |          |        |          |        |          |         |           |     |     |        |     |          |     |             |      |          |            |     |
| Harassment/ Discriminator y Statements |           |          |        |          |        |          |         |           |     |     |        |     |          |     |             |      |          |            |     |
| OTHER                                  |           |          |        |          |        |          |         |           |     |     |        |     |          |     |             |      |          |            |     |