



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

Midwest Regional Office, Region V
Ralph H. Metcalfe Federal Building
77 West Jackson Boulevard – Room 2101
Chicago, Illinois 60604-3507

Office of Fair Housing and Equal Opportunity

November 28, 2016

Ms. Owana Miller
Director, Dept. of Community Development
City of Hammond
5925 Calumet Ave
Hammond, IN 46320

Dear Ms. Miller:

Thank you for your support as HUD implements its Affirmatively Furthering Fair Housing (AFFH) rule and your efforts in completing an Assessment of Fair Housing (AFH). As you know, the AFH assists communities in identifying fair housing challenges and opportunities and will help your jurisdiction make more informed community planning decisions with the results.

We are pleased to inform you that the U.S. Department of Housing and Urban Development (HUD) has accepted your AFH (see 24 C.F.R. § 5.162(a)(2)).

Now that HUD has accepted your AFH, please be aware that the AFFH Final Rule provides that:

1. Your consolidated plans and annual action plans, and PHA Plans (including any plans incorporated therein), must include strategies and actions that implement the priorities and goals from the AFH that are intended to affirmatively further fair housing. Strategies and actions must affirmatively further fair housing and may include, but are not limited to, enhancing mobility strategies and encouraging development of new affordable housing in areas of opportunity, as well as place-based strategies to encourage community revitalization, including preservation of existing affordable housing, including HUD-assisted housing. (see § 5.154(d)(5).
2. In addition, the AFH process is intended to inform other community plans including, but not limited to; education, transportation, or environmental related plans. For options and recommendations on how this may be accomplished, please see the AFFH Rule Guidebook.

HUD has many resources designed to support your AFFH efforts. You will find a portal for requesting AFFH technical assistance, fact sheets, and other useful AFFH resources at HUDExchange.info. Please reach out to your local HUD field office with any questions or to obtain technical assistance.

We look forward to working collaboratively with you during 5-year planning cycle in your efforts to affirmatively furthering fair housing.

If you have questions about this letter, please contact Philip Shelton, 317-957-7333 or PHILIP.C.SHELTON@hud.gov

Sincerely,

A handwritten signature in black ink, appearing to read "Maurice J. McGough". The signature is written in a cursive style with some loops and flourishes.

Maurice J. McGough
Office of Fair Housing and Equal Opportunity
Region V Director

ADDENDUM – Additional Reviewer Feedback
Assessment #10: City of Hammond, IN AFH

Thank you again for your Assessment of Fair Housing (AFH). The Department has accepted your submission with the following comments. These comments are intended to provide additional information and feedback regarding your AFH and suggestions you may want to consider for implementing your goals and when preparing future submissions. There are also areas where HUD has inferred certain analysis and consideration of fair housing issues, and if you disagree with the accuracy of those statements, we welcome further conversation. And as always, we are here if you have any questions.

VI. Fair Housing Goals and Priorities

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

Feedback :

- The prioritization of the identified Contributing Factors for each Fair Housing Issue could be more clearly identified. The justification of the prioritization of the Contributing Factors could also be more clearly explained. The identification and prioritization of Contributing Factors is a process intended to inform goal setting, and help identify strategies, actions, and policy responses to Fair Housing Issues, and is a critical component of the AFH and each program participant's ultimate success.

The justification for the prioritization of Contributing Factors may be drawn from the analysis of HUD provided data, or such elements as community participation or other sources of local data and local knowledge.

The following is an example of how contributing factors might be prioritized and how the prioritization is justified:

Contributing Factor Identified: Lack of public investment in specific neighborhoods, including services or amenities

Prioritization: High

Justification: The lack of public investments in specific neighborhoods has been selected as a contributing factor of high priority because of its significant effect on fair housing choice and the fair housing issues of segregation, R/ECAPs, and access to opportunity.

The City has traditionally divided its funding equally among neighborhoods. While equally distributing funds allows some areas to adequately support their community development needs, it does not allow those areas with the greatest need to meet their community revitalization needs, namely the northeast area of the City.

The City is setting a goal for this contributing factor, not only to target funding in a strategic manner in order to address community revitalization needs, but also because this contributing factor can be easily addressed through a change in City policy. This contributing factor also relates to the discussion of lack of community revitalization strategies, which was also identified as a significant contributing factor for the jurisdiction.

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

Feedback :

Measuring progress of achieving the goals set depends on the metrics and milestones associated with the goals. Metrics and milestones selected for measuring progress of a fair housing goal are a critical part of the goal, and provide an additional level of specificity to clarify the nature of the goal. For this reason, it is important to set measures that are meaningful, realistic, and quantifiable. Program participants should be mindful that the fair housing priorities and goals set within the AFH will affect and be incorporated into subsequent planning processes, including the strategies, actions, and funding priorities established in the Consolidated Plan and PHA plan. Fair housing goals must be measurable, tracked, and ultimately, must affirmatively further fair housing.

HUD leaves determining what metrics and milestones should be to the discretion of program participants; it could be a certain number of units created per year, a number or percentage of loans originated for minority homebuyers, number of tests to conduct per year, etc. However, a method to evaluate progress towards a goal should be established. To the extent that goals are process oriented, program participants should include timeline or process-based metrics such as, number of new partnerships created, time to initiate and complete an inquiry, or a timeframe to develop strategic solutions. Some of Hammond's metrics and milestones are not detailed enough for to adequately track and evaluate progress toward their fair housing goals. HUD recognizes that working to achieve progress in fair housing and access to opportunity is a process, and would anticipate a greater level of detail in following planning documents as some of Hammond's metrics and milestones become further developed.

Feedback:

HUD recommends following the SMART system for setting goals and establishing metrics and milestones for achieving them. SMART: Specific, Measurable, Action oriented, Realistic, and Time bound.

Program participants should note that the strategies and actions, and the specifics of funding decisions, subject to the consolidated plan, PHA plan, or other applicable planning process are not required to be in the AFH.

An example of Fair Housing Goals that address Contributing Factors is below:

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Preservation of 200 units of affordable housing in X, Y, and Z neighborhoods, which have high-performing schools	Location and type of affordable housing Displacement of residents due to economic pressures	Disparities in Access to Opportunity	Within 6 months, publish and begin implementing a detailed 5-year plan to preserve and improve 100 units of affordable rental housing in X, Y and Z neighborhoods; including a plan to collect and analyze data on at-risk properties; facilitate collaboration among federal, state, and local agencies; and reduce operating costs.	Program Participant

Discussion:

Discussion: In recent years, rents have risen rapidly in neighborhoods with high-performing schools, pricing out many low-income families, who are disproportionately black and Hispanic families. Within 6 months, the jurisdiction will publish and begin implementing a detailed 5-year plan to preserve and improve 200 units of affordable rental housing in X, Y and Z neighborhoods, which were identified in the assessment as having high-performing schools and rising rents (and at risk of segregating through displacement of minority families). The plan will include timeframes to collect and analyze data on at-risk properties; facilitate collaboration among federal, state, and local agencies; and reduce operating costs.