

**FINAL REPORT  
FY2014FHIP PEI-MY GRANT #FH700G14023, Year 3**

**I. SUMMARY OF PROGRAM GOALS AND OBJECTIVES**

Northwest Fair Housing Alliance (NWFHA) received a fiscal year 2014 funding award from the Department of Housing & Urban Development (HUD) pursuant to the Fair Housing Initiatives Program (FHIP) Private Enforcement Initiative (PEI) to conduct a 36-month project that commenced 12/1/14. The third year of this grant ended 11/30/17. During the second 12 months of the three-year grant period, NWFHA provided fair housing enforcement services to members of all protected classes covered by the Fair Housing Act in 17 counties in Eastern/Central Washington: Whitman, Garfield, Columbia, Asotin, Walla Walla, Grant, Adams, Lincoln, Douglas, Ferry, Okanogan, Pend Oreille, Spokane, Yakima, Benton, and Franklin. NWFHA also carried out specific program activities designed to combat housing discrimination targeted at Hispanic and disabled populations within our service-region. As set forth in the Statement of Work as amended, specific goals for the third 12 months of the grant period included:

**II. OUTPUT GOALS AND OUTPUT RESULTS/  
ACHIEVEMENT OUTCOME GOALS END RESULTS**

**SUMMARY OFFIRSTYEAR ACCOMPLISHMENTS:**

SOW#:

19. Conduct ~~4000~~ 1500 intake interviews to screen and evaluate for fair housing issues and jurisdiction (inquires)
20. Assist 150 individuals with fair housing allegations and counsel (intake) on fair housing matters.
21. Assist/support Complainants in (50) mediations.
22. ~~Assist 75 clients requesting reasonable accommodations/modifications.~~  
*Assist clients with 75 115 reasonable accommodations/modifications.*
23. Conduct 1 systemic investigation initiated with other Region X fair housing organizations.
24. Conduct 3 housing opportunity access investigations, including mapping census tracts for race and national origin concentrations to compare with location of affordable housing projects to determine if housing choice is impeded in Spokane, Kennewick, and Yakima.
25. Continue advocacy for complaints referred to HUD/WSHRC under concluded prior FHIP grants and still pending.
27. Recruit 25 potential testers, through advertising in an online bulletin boards; networking among staff acquaintances; community fairs and events; and by contacting advisers of special interest groups at local colleges.
28. Train 10 new fair housing testers using previously approved HUD tester training materials

29. Conduct investigation of 5 mobile home parks for national origin discrimination, to include 10 paired rental site tests
30. Conduct investigations of 5 insurance companies for disability discrimination, including 5 disability phone or email test parts.
31. Conduct ~~20~~10 investigations of senior housing for race, national origin, and sex discrimination, to include 40 race, national origin, and sex site test parts.
32. Conduct ~~49~~59 audit or complaint-based rental site test parts based on any protected class.
33. Conduct 5 Accessibility Design / Construction test parts
34. Conduct 8 sales test parts: 4 paired sales tests of national origin Hispanic
35. Conduct investigations of 20 mortgage brokers and originators to identify discriminatory policies for verifying and qualifying disability income, to include 20 unpaired email test parts.
37. Provide tester refresher training to 8 experienced testers
38. Assist 20 persons with disabilities: Provide technical assistance to 10 individuals with disabilities regarding how to self-advocate for reasonable accommodations.
40. Intake and process potentially jurisdictional complaints, including testing and referral. Refer ~~45~~8 complaints to HUD.
41. Mediate or conciliate 4 complaints filed with HUD
42. Provide informative, useful website
43. Provide 2 fair housing basics webinars (1 English and 1 Spanish) for housing consumers and their advocates.
44. Conduct 3 speaking engagements and/or meetings with housing industry and/or government staff: ~~Coordinate with staff of WSHRC to conduct 1 fair housing conference for landlords and social service providers in TriCities, WA~~ Conduct 1 Fair Housing training for landlords in ~~Benton City~~ Clarkston • Coordinate with HUD, WSHRC, SLIHC, Spokane County, City of Spokane, and Spokane Housing Authority to provide 1 annual fair housing conference in Spokane • Conduct 1 fair housing training in Yakima for landlords.
45. Distribute Fair Housing PSAs to media outlets (*removed from budget during Nov. 2016 negotiations*)
46. Targeted outreach to 16 specific groups
47. Outreach to landlords to inform them about the need to affirmatively further fair housing
48. Partner with region X QFHO organizations in ID and WA to conduct 4 fair housing activities to educate housing consumers, housing providers, and social service
49. Provide training to State and local government and partners to affirmatively further fair
50. Provide 3 webinar trainings for housing providers on fair housing topics
51. Contract with Center for Justice to provide legal advice, representation, and assistance to NWFHA and its clients.

52. Conduct testing investigations in rental housing based on any protected class using email or phone test parts as needed.

During the third 12-month period of the grant (12/1/16-11/30/17), NWFHA staff:

- Responded to **more 1500 inquiries** received by telephone and in-person, from individuals seeking assistance.
- Completed **intake and investigated 154 complaints** of housing discrimination.
- Assisted complainants with **57 mediations**.
- Obtained **130 reasonable accommodations/modifications** for persons with disabilities who filed fair housing complaints with our agency. As a result of the granted accommodation requests, these clients did not have to file administrative complaints.
- Provided technical assistance to 29 individuals with disabilities on how to self-advocate for reasonable accommodations
- **Referred 8 complaints to HUD/WSHRC** for enforcement.
- **Conciliated 10 complaints** filed with HUD
- Provided **4 fair housing webinars in English and 1 in Spanish for housing providers and advocates**
- Conducted **1 fair housing training** for housing authority personnel, landlords and social service providers in Clarkston, WA; **1 annual fair housing conference** in Spokane in coordination with HUD, WSHRC, SLIHC, Spokane County, City of Spokane, and Spokane Housing Authority; and **1 fair housing training** in Yakima for landlords.
- **Targeted outreach to 16 specific groups--engaging 763 persons at 15 events during which FH materials in 3 languages (English/Spanish/Russian) were distributed.**
- **Provided 19 fair housing presentations to housing providers and consumers**
- **Partnered with region X QFHO organizations in Idaho and Washington to conduct fair housing activities to educate housing consumers, housing providers, and social service advocates** who access services or conduct business across state lines and multiple FHIP agency service areas.
- **Participated in an annual Fair Housing Summit** of FHIP QFHO's in Region 10, and an **annual Case Management and Testing Staff Summit** with Region X FHIPS
- Conducted **1 systemic investigation with another Region X FHOs based on regional multi-state design and construction violations.**
- **Continued advocacy on 22 HUD/WSHRC complaint referrals filed prior to the grant period.**
- **Completed 106 tests.**

### **COMPLAINTS:**

NWFHA referred 8 complaints to HUD and/ or the Washington State Human Rights Commission.

**Complaints Received By NWFHA 12/1/15-11/30/16**

|   | Race | Nat. Orig. | Disab.   | Gender   | Fam Status | Color | Religion | Totals      |
|---|------|------------|----------|----------|------------|-------|----------|-------------|
| <b>Intakes Received</b>                                       |      |            |          |          |            |       |          | <b>1502</b> |
| <b>Allegations Investigated</b>                               |      |            |          |          |            |       |          | <b>154</b>  |
| <b>Complaints referred to HUD/ WSHRC/ or private attorney</b> |      | <b>1</b>   | <b>6</b> | <b>1</b> |            |       |          | <b>8</b>    |

***MEDIATIONS/CONCILIATIONS:***

During the project, NWFHA staff **obtained 130 reasonable accommodations and modifications:**

**Reasonable Accommodations Obtained: 156**

***TESTING:***

During this project, NWFHA continued to refine and expand its tester recruitment program, developing a broad list of regular resources for continuous tester recruitment.

- 31 new testers were recruited. Some were trained to conduct rental testing; 10 have become active testers.
- **106 tests were completed:**
  - 10 paired mobile home tests based on national origin. None showed any evidence of discrimination.
  - 5 insurance companies were tested by phone. The tests were based on disability. None of them showed any evidence of discrimination.
  - 10 paired rental tests of senior housing complexes based on race. One test showed possible discrimination and one other tests showed some difference.
  - 32 paired on site and 5 single tester on site rental tests (total of 69 parts) based on any protected class were conducted. The protected classes included Native American, Disability, Race, Religion, National Origin and Domestic Violence. 3 tests showed possible discrimination and 5 tests showed some differences.
  - 5 accessibility tests were conducted. 1 test showed minor violations.

- 1 accessibility test was conducted as part of a multi-agency joint investigation. The tests showed major violations of the FH Design & Accessibility requirements.
  - 4 paired on site sales tests based on national origin were conducted. None showed any evidence of discrimination.
  - 22 phone tests of mortgage lenders were conducted. The tests were based on disability. 1 tests showed evidence of discriminatory policy.
  - 12 email/phone tests were conducted. The protected classes were Familial Status, Religion, Disability and Race. 6 of the tests showed evidence of discrimination.
- Sites where there was differential treatment have been or will be retested.

## **HOUSING OPPORTUNITY ACCESS**

NWFHA conducted 3 housing opportunity access investigations, including mapping census tracts for race and national origin concentrations to compare with location of publically assisted housing to determine if housing choice is impeded in Spokane, Kennewick, and Yakima. Summaries of findings are below.

### **Identified indicators of impediments to housing choice include:**

- publically-assisted housing concentrated in the R/ECAP areas of Kennewick and Yakima
- concentration of publically-assisted housing in 3 tracts in Spokane, with several properties evidencing disparate racial or national origin concentrations properties.

### **Spokane - Summary**

- There are no R/ECAP tracts in Spokane
- There is no Public Housing in Spokane
- There are 30 Project-based Section 8 properties.
  - **47% of these are concentrated in 3 census tracts** (53063002400, 3500 and 3100), with 5, 5, and 4 properties respectively. These 3 tracts are in West Central, Downtown, and East Central Spokane. **There are racial and national origin concentrations in several of these properties that are significantly higher than representation in the general population.** 3 of 4 properties in Track 3100 have black populations over 22%, highly disproportional to the nearly 2% black population in Spokane. 2 of these 3 also have disproportionately high populations of Asian and Hispanic residents. In Tract 2400, two neighboring properties have very different populations. 1 has 10% Hispanic and 0% black and 2% Asian. The other is 8% black and 11% Asian, but 0% Hispanic. Project based properties in Tract 3500 have Hispanic, Asian, and black populations at or below their overall representation in the City, with the exception of 1 property which has 10% black residents.



- **3 of the 5 properties are located in the R/ECAP tract.**
- There are 10 low-income tax credit properties.
  - **6 are concentrated in Tract 11200, in the R/ECAP. A 7<sup>th</sup> is in a tract bordering the R/ECAP**
  - 3 additional LITC properties are located in 3 other tracts.
- 3 other multi-family properties are located in 3 tracts, not within the R/ECAP.
- Less than 2% of the Kennewick population is black, but **blacks are highly over represented in the HCV program**: 23.85% of program participants in the R/ECAP tract and 9.95% in the non R/ECAP tracts. The R/ECAP tract and tract 010901 have the highest percentage of voucher units (> 14.80 %).

**Conclusions:**

- **Publically assisted housing is concentrated with the R/ECAP tract. The siting of future publically assisted housing outside the R/ECAP should be considered by policymakers to ensure housing choice throughout Kennewick.**
- **The number of landlords participating in the HCV Program should be increased outside the R/ECAP to promote equal housing opportunity for black voucher holders.**

**Yakima – Summary**

- There are 4 R/ECAP tracts in Yakima, all adjoining.
- Yakima has no public housing properties.
- There are 7 project-based Section 8 properties
  - **5 of the 7 properties are located in R/ECAP tracts.**
- There are 21 low-income tax credit properties.
  - **13 (62%) are concentrated in the R/ECAP tracts**: 2 in 53077000100, 5 in 53077000200; 3 in 53077000600; and 3 in 53077001501
  - 8 additional LITC properties are located in 4 other tracts (3 in 53077001502).
- 2 other multi-family properties are located in 2 tracts, not within the R/ECAP.

**Conclusion: Publically assisted housing is concentrated with the R/ECAP tract. The siting of future publically assisted housing outside the R/ECAP should be considered by policymakers to ensure housing choice throughout Kennewick.**

## **TECHNICAL ASSISTANCE TO INDIVIDUALS WITH DISABILITIES**

During the third year of the grant NWFHA provided technical assistance to 29 individuals with disabilities regarding how to self-advocate for reasonable accommodations.

Technical assistance is provided when individuals demonstrate the ability to self-advocate or have another advocate (case manager, family member, etc.) available to assist, and/or the individual does not want NWFHA to be involved with the housing provider and desires to self-advocate. Technical assistance typically includes providing relevant brochures and handouts (on requesting reasonable accommodations, assistance animals, etc.), providing verbal coaching on how to proceed with requesting reasonable accommodations, reviewing reasonable accommodation request documents prepared by the individuals, checking with the individuals periodically throughout the process, and offering NWFHA's assistance if accommodation requests are not granted. As a result of providing such technical assistance, individuals with disabilities and their advocates are empowered and better able to advocate for their fair housing rights throughout their lives as housing consumers, and NWFHA staff have more time to devote to advocating for people with disabilities who are unable to self-advocate.

## **COLLABORATIVE EFFORTS**

**Region X Fair Housing Executive Directors Summit**, September 27-29, 2017, Anchorage, AK. The Executive Directors from Northwest Fair Housing Alliance, Fair Housing Center of Washington, and the Program Director from Alaska Legal Services participated in a regional summit to discuss best shared practices.

**Region X Fair Housing Intake, Case Management and Testing Summit**, Sept. 14-15, 2017, Boise, ID. 2 staff from Northwest Fair Housing Alliance, and staff from the Fair Housing Center of Washington, and the Intermountain Fair Housing Council of Oregon attended a regional summit to discuss best shared practices.

## **EDUCATION/OUTREACH ACTIVITIES:**

NWFHA participated in a variety of education and outreach activities in Eastern and Central WA, particularly focused on providing information about the Fair Housing Act and NWFHA's services to Latino/Hispanic communities and individuals with disabilities. During the third year of the grant, NWFHA staff:

- Attended the following community meetings:
  - Community Dialogue: Expanding Affordable Housing in Spokane
  - Islamic Center Open House, Spokane Valley, WA
  - Low income Housing Forum with Spokane Low Income Housing Consortium, Washington State Low Income Housing Coalition, Goodwill Industries, Spokane, WA
  
- Participated in the following community events - provided outreach to the public:
  - Martin Luther King Jr. Parade & Community Resource Fair, Spokane, WA



- Spokane Homeless Connect, Spokane, WA
  - Immigrant & Refugee Fair, Spokane, WA
  - Spokane Pride & Rainbow Festival, Spokane, WA
  - Annual Unity in the Community, Spokane, WA
  - Spokane Latino Heritage Festival, (Fiesta Spokane) Spokane, WA
  - Resource Fair for LEP, Spokane, WA
  - Migrant Educational Program (MEP) Conference, Yakima, WA
  - World Refugee Day, Spokane, WA
  - Title 18, Spokane City Forum, Spokane, WA
- Presented fair housing training and/or information, including at the following venues:
- Crime Free Multi-Housing Training (2x), Spokane, WA
  - Yakima Housing Authority, Kittitas Housing Authority & Catholic Charities Housing Programs, Yakima, WA
  - Spokane Housing Authority-Design & Construction, Spokane, WA
  - Clarkston City Hall, Landlord & Housing Provider Training, Clarkston, WA
  - Annual Inland NW Fair Housing Conference, Spokane, WA
  - KDNA Radio (Radio Cadena), Granger, WA
  - Veterans Program, Goodwill Industries and City of Spokane, Spokane, WA
  - Landlord Association Networking, Goodwill Industries, Volunteers of America, Spokane, WA
  - Spokane Falls Community College-Social Policy, Spokane, WA
  - Spokane Community College, ESL, Spokane, WA
  - Whitworth University, Cultural Considerations for Counselors Program, Spokane, WA
  - Gonzaga Service Learning Class, Spokane, WA, NWFHA offices, Spokane, WA
  - Gonzaga Law School, Moderate Means Program, Spokane, WA
  - Eastern WA University, Disabilities Studies Class, Spokane, WA
  - Adult Education Center for LEP, Spokane, WA
  - Spokane College of English Language, ESL, Spokane, WA
  - NAACP Housing Panel Event, Spokane, WA
  - WA Multifamily Association, Center Place, Spokane Valley, WA
  - WA Manufactured Home Communities Association, Spokane, WA

## **X. CONCLUSION**

The activities reported on in our Quarterly Reports and supporting documentation show that our objectives were met and, in many instances, exceeded. Overall, this project has enhanced access to effective fair housing enforcement services in Eastern Washington and laid the groundwork for continued expansion of these services.