## **COUNTY OF OAKLAND, MICHIGAN**

# A REGIONAL ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE UPDATE FOR OAKLAND COUNTY

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# Oakland County, Michigan ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE - UPDATE

June 2017

This Oakland County Analysis of Impediments to Fair Housing Choice (AI) is an **update** to the previous Analysis published November, 2012 which was a regional approach titled "Regional Housing Needs and Neighborhood Resiliency Strategy for Southeast Michigan – Fair Housing and Equity Assessment for Southeast Michigan". Preparation of the regional AI document was coordinated by the Southeast Michigan Council of Governments (SEMCOG) and guided by members of the Regional Housing Strategy Task Force including members from the Oakland County Community & Home Improvement Division.

The Oakland County Community & Home Improvement (CHI) Division administers U.S. Department of Housing and Urban Development (HUD) housing and community development grants including the urban county Community Development Block Grant (CDBG) Program, the HOME Investment Partnership Program (HOME Consortium), the Emergency Solutions Grant (ESG) and Housing Counseling Grant.

#### Oakland County Community & Home Improvement Mission Statement and Goals

Support strong sustainable and inclusive communities through quality affordable housing, community development, human services and economic opportunities.

Goal # 1 - Strengthen the County's housing market and address the need for quality affordable housing. Maintain, preserve and/or develop quality affordable housing for low income households.

#### Goal #2 - Maintain strong resilient neighborhoods.

Invest in public facilities and infrastructure improvements to meet the needs of low income areas and/or address blight.

#### Goal #3 - Improve the quality of life for low income and vulnerable populations.

Enhance human service programs and economic opportunities for low income and special needs populations.

#### Goal #4 - Affirmatively Further Fair Housing and Equal Opportunity

Reduce housing discrimination, promote diverse inclusive communities and affirmatively further fair housing and equal opportunity.

HUD has long empowered grantees to affirmatively further fair housing (AFFH rule) under the Fair Housing Act through fair housing planning, citizen engagement and key deliverables. AFFH rules require grantees to conduct a fair housing planning study or Analysis of Impediments to Fair Housing Choice (AI) and undertake appropriate actions to overcome the effects of impediments identified through that analysis. Current Oakland County AFFH priorities include 1) update the regional AI to identify impediments to fair housing choice within the jurisdiction, 2) consider and take appropriate actions to overcome the effects of any impediments identified through the analysis, and 3) maintain records reflecting the analysis and actions taken in this regard.

#### RATIONALE AND SCOPE - TRANSITION TO THE NEW AFFIRMATIVELY FURTHERING FAIR HOUSING RULE

On July 16, 2015, HUD published a final rule on Affirmatively Furthering Fair Housing (AFFH rule). The AFFH rule creates a new standardized process for grantees' fair housing planning – referred to in the AFFH rule as an Assessment of Fair Housing (AFH). HUD has aligned the new AFH with grantees three-or five-year Consolidated Plan periods. Oakland County shall begin work on the new comprehensive AFH no later than January 2018 for completion by June 30, 2020 and final submittal to HUD by October

4, 2020. This timeframe will align HUD's AFH with Oakland County's next five-year consolidated plan period of 2021-2025.

On April 18, 2016, HUD issued protocols to ensure compliance with existing fair housing and civil rights requirements until the first AFH submittal. Consistent with AFFH transition protocols to the new AFH, the regional AI is used as a basis to identify and update impediments to fair housing choice pertinent to Oakland County. SEMCOG is not updating the existing regional AI (which is viable for five years until November 2017) for jurisdictions in the region. For Oakland County to conduct a new independent AI would be cost prohibitive given the AI's constrained longevity before substantial resources are dedicated to completing the new AFH beginning in January 2018. Therefore, Oakland County will update the existing regional AI as it pertains to the Oakland County jurisdiction specifically and provide new relevant data, analysis and affects upon actions designed to address impediments to fair housing.

#### **CITIZEN ENGAGEMENT UPDATE**

Oakland County's development of the five-year Consolidated Plan for program years 2016-2020 included a detailed strategy to engage the public in the planning and consultation process. Opportunities for input were provided throughout the Consolidated Plan process including commenting on impediments to fair housing choice and initiatives to address identified impediments through news releases, five stakeholder focus groups, public hearings, government and community organization meetings, surveys, the Oakland County website and solicitation for written public comments. Oakland County reached over 11,000 people in its request for feedback. The Consolidated Plan Pr-10 records a description of the County's outreach efforts. Oakland County completed the PY2016-2020 Consolidated Plan for submittal to HUD May 13, 2016. The PY2016-2020 Consolidated Plan conveys fair housing information.

The major findings pertaining to Fair Housing Choice through the Consolidated Plan citizen participation process include:

- Provide resources to develop affordable multi-family rental units and single-family homebuyer units county-wide to expand affordable housing opportunities for low income housing consumers throughout the county -particularly near transportation
- Demolish and clear blighted structures to improve affordable housing neighborhoods and provide properties for new housing development
- Provide resources for multi-family residential rehabilitation to improve the quality of affordable housing
- Support public housing modernization/rehabilitation to enhance housing choices for low income households
- Increase code enforcement to improve blighted properties within affordable housing neighborhoods
- Improve affordable housing neighborhoods to enhance quality housing opportunities
- Strengthen and improve transportation opportunities for low income households
- Increase the availability of rental housing subsidies to help expand housing choices
- Reduce barriers to fair housing through actions to reduce housing discrimination, promote diverse inclusive communities and equal housing opportunities
- Provide fair housing information in multiple languages to expand outreach to those with limited English proficiency
- Provide comprehensive housing counseling services to assist housing consumers with fair housing issues in seeking housing financing or looking for a home or rental property

#### FAIR HOUSING AND EQUITY ASSESSMENT (FHEA) UPDATE – Data, Analysis and Findings

#### **BACKGROUND AND DEMOGRAPHIC DATA**

The Oakland County Community & Home Improvement (CHI) Division completed it Five Year Consolidated Plan for PY2016-2020 on May 13, 2016. CHI developed four Consolidated Plan goals based on data analysis conducted and information collected through citizen participation and consultation efforts. The four goals are: 1) Strengthen the County's housing market and address the need for affordable housing for low income households; 2) Maintain strong resilient neighborhoods; 3) Improve the quality of life for low income and vulnerable populations; and 4) Affirmatively further fair housing and equal opportunity.

The specific objectives of the Consolidated Plan include 1) Address post-foreclosure housing crisis needs; 2) Address the needs of the homeless and at-risk families; 3) Affirmatively further fair housing and equal opportunity to reduce housing discrimination and promote diverse inclusive communities; 4) Expand comprehensive planning, management and capacity; 5) Foster economic development; 6) Improve public facilities and infrastructure; 7) Make available appropriate housing; and 8) Provide and expand human services.

A tremendous amount of updated data appears in the PY2016-2020 Consolidated Plan that provided the foundation to assess Oakland County's housing needs and housing market. The Program Year (PY) 2016 – 2020 Consolidated Plan and data is located on the Oakland County CHI website at AdvantageOakland.com. Summary statements derived from the assessment of this data substantiate and validate the conclusions and recommendations provided in this updated analysis of impediments to fair housing choice or "Fair Housing and Equity Assessment (FHEA) Update".

#### Data Tables/Charts Summary Statements

#### Overview

Oakland County has experienced significant changes in its housing market, employment and social characteristics since the 2012 AI was completed. The County has been in an economic recovery since the end of the Great Recession in 2009, having turned the corner towards positive job growth in the first quarter of 2010. Prior to this recent period of recovery, however, the prior decade was painfully challenging for the entire state of Michigan. It was one of the longest and most severe economic recessions in the state's history. Michigan lost over 760,000 jobs during the decade, the most job losses of any state in the nation. Oakland County, likewise, lost more than 166,000 jobs - over half of those losses occurred during the two-year period of 2008 and 2009. The prolonged economic downturn eventually resulted in Michigan having the highest annual unemployment rate in the nation from 2006 through 2009. Since then, the unemployment rate has been continually decreasing (improving) with the 2014 annual unemployment rate being 6.8% for Oakland County, 7.3% for Michigan, and 6.2% nationally.

Oakland County still faces housing and community development challenges. During the Great Recession, an estimated 30,252 foreclosures on real properties occurred. Foreclosures and their impact on local neighborhoods remained a significant challenge from 2010-2013 when an estimated 26,576 occurred. The foreclosure crisis resulted in vacant and blighted structures in many areas throughout the county that lack sufficient funds to address the issue. The demand for infrastructure, public facility improvements and public services to support LI and special needs populations including the elderly and frail elderly have added pressure to already limited local resources. The County believes activities funded through the Con

Plan will make an impact on identified needs including addressing fair housing although the demand for CDBG, HOME and ESG funded programs remains much greater than resources available.

#### <u>Consolidated Plan Data Summaries – Housing Needs</u>

- The Southeast Michigan Council of Governments (SEMCOG) projects that between 2010 and 2030 Oakland County's population will grow steadily by 2.4% (28,393 persons) and households by 5.3 (25,588 households)
- Approximately 61 % of Oakland County households have incomes greater than 100% of area median income (AMI). 13% of households have moderate incomes (50-80% AMI) and 8.5% have very low incomes (below 30% AMI) based on HUD area median family income.
- The Oakland County median household income in 2010 was \$66,069. 22 of 53 CDBG sub-recipient communities have a lower median household income than the county overall.
- A very small number of renter and homeowner households in all income categories experience substandard housing (lack complete plumbing or kitchen facilities).
- Renter and owner households with extremely low and very low income face the highest level of severe overcrowding.
- Housing cost burden mostly impacts renter and owner households with low income (50-80% AMI)
- Households with lower incomes have greater levels of severe housing problems. Oakland County has more owner-occupied households with severe housing problems than renter households.
- The most common housing problem for renters and owners in Oakland County is cost burden (households paying more than 30% of their income for housing). The number of renters with cost burden increases as income decreases.
- Severe cost burden (paying more than 50% of income on housing) is problematic for renters and owners. Severe cost burden is the most significant housing problem for Oakland County renter and owner households with extremely low income (0-30% AMI).
- Housing problems as defined by HUD are not generally disproportionately greater for any race
  or ethnic group compared to the whole across all income levels. However, Hispanic renters with
  incomes between 50 -80% AMI and Hispanic and Black owners between 30-50% AMI and Black
  owners between 50-80% AMI experience housing problems slightly more compared to the
  whole. No minority group experiences a severe housing problem.
- American Community Survey data reported in 2014 that the County's minority population is 21%. Five communities have minority populations that exceed 10% more than the countywide percentage.

#### <u>Consolidated Plan Data Summaries – Housing Market Analysis</u>

- The availability and attainment of decent, safe and affordable housing for current and future
  residents is critical to Oakland County's economic development and quality of life. However,
  limited federal resources made available through HUD, and state and local resources cannot
  meet the housing needs of all low income and special needs households in Oakland County.
- Housing market indicators suggest a market for consistently increasing rental demand, a slowly recovering owner-occupancy rate and a continuing soft market for single-family new construction in most communities.
- Oakland County's housing stock is predominantly single-family detached units (69%) while the second most common housing type is 15-19 unit multifamily apartments or condominiums (11%). Other housing types (17%) include single-family attached homes (2-4 unit buildings) and

apartment complexes of 20 or more units. Approximately 3% of housing is manufactured housing. Manufactured housing developments have unique affordability advantages and most developments have few vacancies. However, manufactured housing (mobile homes) consumers are increasingly facing challenges to maintain affordability and homeownership linked to increasing lot fees, utility costs, permit approval processes and rapid depreciation of unit values. The number of quality manufactured housing units is slightly declining as an affordable housing option for low income residents.

- The number of Oakland County housing units vary by community from a low of 65 to a high of over 36,660 with densities in south Oakland County.
- Unit size by tenure data show that 83% of owner-occupied homes have 3 or more bedrooms. In contrast, 2 bedroom units are most prevalent among rental units (44%). As a result, large families in the rental market may have difficulty finding suitable rental housing based on family size and many of these units are likely to be single-family homes.
- Assisted housing units are units with rents subsidized by federal, state or local government programs. According to the Michigan State Housing Development Authority (MSHDA) Housing Locator on 11-4-2015, there were approximately 7,900 senior citizens subsidized and 4,200 non-senior low income subsidized housing units including designated special needs units. 28% of senior subsidized units and 52% of other subsidized properties had waiting lists. MSHDA subsidized housing is most concentrated in eight communities throughout Oakland County. Oakland County is not a housing authority and does not own or manage public housing. Four federally funded public housing authorities function independently in Oakland County and MSHDA operates the Housing Choice Voucher/Section 8 program funding subsidies for low income persons in Oakland County.
- Rent restrictions on 976 units located throughout the county are expiring or have expired between September 2015 and October 2017. Landlords have the option to renew subsidy contracts or convert to market rate properties. Subsidized units may be lost if landlords choose to convert properties to market rents.
- Lower personal income and market credit restrictions have made purchasing a home out of reach for low income buyers. Homebuyer subsidies and/or affordable rents have become the most viable option for low income housing consumers.
- Community Housing Network (CHN) is a non-profit organization committed to providing homes
  for people in need through homelessness prevention, housing assistance and development.
  CHN secured approximately \$8 million in Low Income Housing Tax Credits from MSHDA to
  provide well over 188 units of affordable housing since 2011. CHN and Venture, Inc are
  qualified Community Housing Development Organizations under the Oakland County HOME
  Consortium and received HOME funds to develop 12 affordable single-family owner-occupied
  units.
- Cost burden limits a homeowner's ability to access disposable income to fund a new purchase or
  existing home improvement costs. Oakland County's Home Improvement Program improves the
  quality of homes and sustains housing values thereby allowing low income homeowners to
  modify and remain in affordable housing. Oakland County improves up to 200 housing units
  across the county annually.
- SEMCOG projects that by year 2040, 35% of all households in the region will be headed by a
  person over 65 years of age. Households over 65 will increase by 300,000. This demographic
  shift will increase demand for assisted living units set aside for elderly households as well as
  accessible features and other adaptive changes to single-family home, conventional apartments,
  condominiums and townhouses.

- Senior citizens are living longer and will more likely need additional services and require
  modified homes. As many older drivers outlive their ability to drive by up to 10 years, the
  demands of alternative forms of transportation will increase greatly.
- Data indicates that there are ample units to house the population. However, high home values, increasing rents, static fair market rents and static income levels make much of the housing stock unaffordable for lower income groups.
- Although the numbers of mortgage foreclosures have declined significantly since 2010, property tax and mortgage foreclosure numbers exceeded 1,800 in 2014. Foreclosures contribute to lower housing values, neighborhood destabilization and decline.
- Over 300,000 housing units built before 1980 may contain lead-based paint hazards requiring intervention, improvements and education.

#### Fair Housing Complaints Received by Fair Housing Agencies

• The Fair Housing Center of Metropolitan Detroit (FHCMD) – FHCMD continues to work cooperatively with local, state and federal units of government since it was organized in 1977. Over the past program year (July 2016-July 2017) FHCMD investigated a total of 42 housing discrimination claims from housing consumers in 20 of Oakland County's 61 cities, townships and villages. Twenty-three of the claims originated from housing consumers in 16 of Oakland County's 53 Community Development Block Grant (CDBG) sub-recipient communities and 19 claims were received from residents in five non-urban county CDBG communities.

FHCMD developed and conducted a fair housing training and information program for units of government and housing program stakeholders for Oakland County during PY2016.

- The Michigan Department of Civil Rights (MDCR) MDCR is an administrative agency with investigative and enforcement authority. MDCR investigates complaints to determine whether unlawful discrimination has occurred. Oakland County is not aware of complaints filed with MDCR regarding housing discrimination.
- U.S Department of Housing and Urban Development Any housing discrimination complaints filed with HUD is information already in custody of the Office of Fair Housing and Equal Opportunity.
- Oakland County Community & Home Improvement's Housing Counseling and Homeless Services unit (HCHS) provides comprehensive housing counseling services to all housing consumers in Oakland County. Fair housing outreach, education, referrals and one-on-one counseling sessions are conducted continuously throughout each year. HCHS is a U.S. Department of Housing and Urban Development approved local housing counseling agency and Michigan State Housing Development housing education service provider. Counselors are trained to provide fair housing services and referrals. Counselors referred three clients (client discretion) to investigation and enforcement agencies including HUD, Fair Housing Center of Metropolitan Detroit and Michigan Department of Civil Rights for investigation over the past two program years.

#### FINDINGS – A FOUNDATION FOR FAIR HOUSING ACTIONS

County housing findings are developed through data analysis, citizen engagement, local housing needs assessments, the County's independent analysis of characteristics specific to Oakland County and reassessing data generated through the regional Fair Housing and Equity Assessment (FHEA). The findings are related to five guiding principles:

- There are <u>systemic</u> issues that are key to creating resilient neighborhoods and must be addressed by Oakland County or by each community as appropriate;
- <u>Neighborhoods</u> are the backbone of our communities and their health is a main indicator of economic stability in the county;
- The condition, quality, and availability of our <u>housing stock</u> have been impacted by the County's changing demographics – primarily personal wealth, affordable housing and cost burden;
- Maintaining and promoting <u>fair housing</u> services and activities and neighborhoods that are
  diverse and equitable is vital for <u>sustainable and thriving communities</u>. Geographies of
  opportunity or places that effectively connect people to jobs, quality public schools and other
  amenities result in sustainability; and
- Affordability and accessibility of the jurisdiction's housing must be preserved and encouraged

The regional FHEA identifies and assesses five components related to equity and access to opportunity:

- Segregated Areas and Areas of Increasing Diversity and/or Racial/Ethnic Integration
- Racially Concentrated Areas of Poverty
- Access to Existing Areas of High Opportunities
- Major Public Investment
- Barriers to Fair Housing Choice
  - o Discrimination is a barrier to furthering fair housing
  - The lack of education concerning fair housing laws impedes compliance with fair housing laws
  - o Discrimination in home buying and home financing reduces fair housing choice
  - Discrimination in rental housing management practices can be barriers to fair housing choice
  - The lack of affordable housing throughout a jurisdiction hinders fair housing choices for housing consumers with low incomes
  - The lack of affordable and accessible housing prevents fair housing choice for persons with disabilities or special needs
  - Local land use regulations and controls can drive up the cost of housing preventing fair housing choice for persons with low income
  - o Lack of public transportation hampers fair housing choice for persons with low income

The result of this regional scale analysis is to understand the historical, current and future context for equity and opportunity in the region and the data and evidence that demonstrates those dynamics, and to integrate knowledge developed through the regional FHEA exercise into the strategy development process. The data provided and analysis of these components pertaining to Oakland County are valid and relevant and as such are incorporated into this FHEA/AI update by reference.

Since any strategy or plan is only as good as the policies and actions it inspires, this FHEA strategy update focuses on policy and local action recommendations that respond to potential systemic housing issues, as well as challenges to neighborhood stability, condition of housing stock and fair housing opportunities, and availability of affordable housing that provides access to jobs and services. As such,

this strategy identifies 32 recommendations that address the County's housing needs and promote resilient neighborhoods within our communities. These recommendations include policy recommendations to be advocated by Oakland County and/or housing stakeholders and action recommendations that can be customized by local jurisdictions for neighborhood level solutions to improve desirability, stability, and resiliency of local housing markets. This strategy is a living document, meaning that its policy and local action recommendations will both evolve over time to be integrated into local planning efforts.

#### RECOMMENDATIONS - FAIR HOUSING ACTIONS TO OVERCOME IMPEDIMENTS TO FAIR HOUSING

The following policies and local actions are recommended to overcome impediments to fair housing choice. The policies and actions result from practitioner and citizen engagement, the County's independent analysis of characteristics specific to Oakland County as well as reassessing data generated through the regional FHEA/AI.

- 1. Support federal fair housing policy that encourages equal access to housing opportunities for all persons
- **2.** Prioritize funding for housing counseling services and promote state and federal housing counseling programs and policies
- **3.** Proactively promote foreclosure information and housing counseling opportunities to homeowners and renters
- 4. Support continued state and federal initiatives for foreclosure prevention
- **5.** Promote dependable and consistent state and federal support and funding that addresses the core housing challenges of the county rehabilitation of substandard housing, demolition and new affordable housing construction
- **6.** Prioritize resources for housing rehabilitation, energy efficiency, and weatherization
- **7.** Support housing development in mature areas especially infill development near or along transit corridors and locations near employment centers and services
- 8. Support public transit and/or alternatives to link housing to jobs and services
- 9. Support essential programs that address the County's senior and/or disabled persons housing needs
- **10.** Support programs that combat and prevent homelessness in the County
- **11.** Expand financing tools and market incentives in neighborhoods destabilized by high numbers of foreclosures, vacancies, and diminished private market investment
- **12.** Promote policies that enable Public Housing Authorities (including subsidized and low-income rental housing) to appropriately invest in the upkeep and maintenance of their properties
- **13.** Support Low-Income Housing Tax Credit (LIHTC) projects to develop affordable housing in Oakland County
- **14.** Advocate for adequate funding for administrative costs of the Section 8 Housing Choice Voucher Program and renewal of all authorized vouchers
- **15.** Fund strategic and targeted demolition, residential rehabilitation, infrastructure, infill development and public service strategies to stabilize neighborhoods
- **16.** Encourage local policies which provide housing choices that enable people to remain in the community as they age
- **17.** Support property improvement initiatives identified through local code enforcement and property maintenance policies
- **18.** Advocate local vacant property registration ordinances that allow communities to inspect, monitor and require owners to register vacant properties as soon as they become vacant
- **19.** Advocate local rental housing policy (includes rental registration, inspection, and certification ordinance/regulation) to ensure a minimum standard of housing quality

- **20.** Build partnerships with local communities and stakeholders to preserve clean, safe, and healthy neighborhoods
- **21.** Expand and enhance landlord fair housing education programs and outreach
- **22.** Encourage needed housing types through local land use, building, and zoning regulations
- 23. Encourage public/private partnerships in redevelopment of local housing markets
- **24.** Encourage local communities to provide citizens, homeowners, landlords, and others with information on housing choices, housing values, housing costs including housing, transportation, and energy costs.
- **25.** Provide local communities with information to Improve and make more uniform fair housing information on community Web sites
- 26. Improve and expand fair housing information on Oakland County Web site
- 27. Educate and inform local officials, the public, and landlords of fair housing laws and best practices
- 28. Expand fair housing outreach and education to persons with limited English proficiency
- **29.** Increase local education campaigns on the community benefits of providing affordable and inclusive housing options
- **30.** Expand marketing of equal opportunity access to programs and services
- **31.** Promote rental preservation and affordable housing in areas that are transit accessible, and near employment opportunities and services
- 32. Expand and enhance residential energy efficiency education and access to incentives

### FAIR HOUSING PROGRAM ACTIONS AND ACTIVITIES – OVERCOMING THE EFFECTS OF IDENTIFIED IMPEDIMENTS TO FAIR HOUSING CHOICE

FHEA information and findings provide a foundation to identify impediments to fair housing choice and prioritize actions and investment to affirmatively further fair housing. The following fair housing initiatives and activities have been undertaken by Oakland County over the past two years to overcome the effects of fair housing impediments:

1. HOUSING COUNSELING SERVICES – Oakland County invests over \$300,000 in Community Development Block Grant, federal Housing Counseling Grant and Michigan State Housing Development Authority housing education funds annually to provide comprehensive housing counseling services for Oakland County residents. Oakland County Community & Home Improvement (CHI) sustains a HUD certified local housing counseling agency with 3 professional counselors providing 1-on-1 counseling to over 450 clients and telephone counseling to over 1,200 housing consumers each year. Counselors vigorously promote fair housing to address and prevent housing discrimination under state and federal fair housing laws. Services address mortgage and property tax foreclosure, predatory lending, housing discrimination, home buying, affordable housing mortgages, reverse mortgages, tenant rights/responsibilities, preventing homelessness, home repairs, subsidized housing, rental assistance for low income households and credit/budget issues. Housing Counselors receive ongoing Fair Housing training each year.

Oakland County Housing Counseling is a barrier free facility and offers interpreter services to clients with language barriers or are hearing-impaired and works to accommodate other special needs.

2. FAIR HOUSING LAW WORKSHOPS – Oakland County contracts with the Fair Housing Center of Metropolitan Detroit to educate County staff, community officials, landlords, housing providers and the public on fair housing law and protection from discrimination.

- 3. HOUSING COUNSELING & HELP WITH HOUSING DISCRIMINATION PUBLIC AWARENESS Oakland County developed housing counseling brochures, palm-cards and posters in English and Spanish promoting help with housing discrimination for distribution countywide and specifically within communities having substantial minority and lower income population concentrations.
  - CHI strengthened ongoing housing counseling partnerships with the Oakland County Treasurer to resolve property tax delinquency and foreclosure. The Treasurer's Office promotes CHI housing counseling services including fair housing in all past due property tax notices to residents for resource and referral.
- 4. WEBSITE ENHANCES FAIR HOUSING INFORMATION Oakland County strengthened fair housing information on the County website to link users to fair housing resources outside of CHI.
- 5. COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) IMPROVES ACCESS TO PUBLIC FACILITIES AND SERVICES Many CDBG sub-recipients prioritize the use of CDBG funds to improve barrier free access to public facilities. Projects improve access to street crossings, sidewalks, parking, public buildings, parks, community centers, bathrooms, meeting spaces, private single-family owner-occupied homes, mobile (manufactured) homes, etc. Communities also prioritize equal opportunity public services to address the special needs of low income, disabled and senior residents including home chore, yard services transportation, emergency food/clothing
- 6. EQUAL OPPORTUNITY TO IMPROVE HOMES CHI administers a full service county-wide, equal opportunity Home Improvement Program for low income residents to upgrade their home and neighborhood. Program promotion includes direct mailings to households with lower housing values countywide to help sustain neighborhoods. These mailings also include housing counseling information.
- 7. FAIR HOUSING MONTH CELEBRATION Oakland County celebrates "April is Fair Housing Month" to maximize public education on fair housing laws and promote a renewed community commitment to Fair Housing. Activities include County Executive proclamation and news releases; tabletop displays at events and conference center for viewing by thousands of residents; distribution of fair housing posters and information packets to communities with recommended initiatives to affirmatively further fair housing locally; county website and social media announcements; distribution of fair housing posters and information to human service agencies, libraries, homeless assistance providers and senior centers.
- 8. ANNUAL REPORT PROMOTES HOUSING COUNSELING AND FAIR HOUSING SERVICES Oakland County Community & Home Improvement publishes a report on services and programs annually showcasing fair housing and housing counseling services. The report is distributed as an insert to newspapers, through direct mailings and distribution to over 45,000 residents, communities and agencies. The report is also posted through the County's website at AdvantageOakland.com and county department public information displays.
- 9. EQUAL OPPORTUNITY AND ACCESS Oakland County ensures equal opportunity and access to all federally funded programs and activities.
- COMMUNITY & AGENCY FAIR HOUSING OUTREACH Sub-recipient communities, housing development agencies and public service agencies funded by federal U.S. Department of

Housing & Urban Development programs prominently place fair housing posters and information for the public to view and are required to affirmatively further fair housing in providing services.

11. OAKLAND COUNTY SUPPORTS EQUAL OPPORTUNITY AFFORDABLE HOUSING DEVELOPMENT COUNTY-WIDE - CHI funds Community Housing Development Organizations (CHDOs) to develop and expand affordable homeownership for low income homebuyers.

CHI provides Certificates of Consistency and advocacy for affordable housing developers and non-profit agencies to obtain low income tax credits and/or other state and federal housing assistance in developing multifamily rental housing.

CHI provides equal opportunity and access to rental housing through Emergency Solutions Grant Homeless Prevention and Rapid Re-Housing assistance.

All households should have the opportunity to make personal housing choices that are within their economic means while best meeting their needs and preferences. Oakland County will continue to identify impediments to fair housing choice and develop strategies to affirmatively further fair housing in the future.