

ANALYSIS OF IMPEDIMENTS  
TO  
FAIR HOUSING CHOICE

CITY OF NEW HAVEN, CONNECTICUT

***DRAFT FOR PUBLIC COMMENT***  
***JANUARY 2003***

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## **I. INTRODUCTION AND EXECUTIVE SUMMARY**

## **I. INTRODUCTION AND EXECUTIVE SUMMARY**

### **A. Introduction**

The purpose of this document is to meet the provisions outlined in Section 808(e)(5) of the Fair Housing Act which requires that the Secretary of HUD administer housing and urban development programs in a manner to affirmatively further fair housing. The various housing and community development programs through which the City receives funds, require grantees to certify that they will affirmatively further fair housing as part of the obligations assumed when they accept HUD program funds. In 1995, as part of the final rule for Consolidated Submissions for Community Planning and Development Programs (24CFR91) it was required that grantees submit an Affirmatively Furthering Fair Housing (AFFH) certification as part of their Consolidated Plan. This certification, which is signed every year by the Mayor as part of the City's Annual Action Plan requires grantees to undertake Fair Housing Planning (FHP) through:

- 1) The completion of an Analysis to Impediments (AI);
- 2) Actions to eliminate any identified impediments; and
- 3) Maintenance of AFFH records.

The Analysis of Impediments to Fair Housing Choice (AI) is a review of impediments to fair housing choice in both the public and private sector. Impediments to fair housing choice are defined as:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin which restrict housing choices or the availability of housing choices; or
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status or national origin.

According to the HUD Fair Housing Planning Manual, the broad objectives of Affirmatively Furthering Fair Housing can be interpreted to mean:

- Analyze and eliminate housing discrimination in the jurisdiction.
- Promote fair housing choice for all persons.
- Provide opportunities for racially and ethnically inclusive patterns of housing occupancy.
- Promote housing that is physically accessible to, and usable by, all persons, particularly persons with disabilities.
- Foster compliance with the nondiscrimination provisions of the Fair Housing Act.

The City prepared its initial Analysis of Impediments to Fair Housing in 1996. Now, in 2003, an update has been prepared to reflect the release of new census data from the 2000 Census and activities undertaken to further fair housing since 1996.

## **B. Executive Summary**

### **1. The Analysis of Impediments to Fair Housing Process**

The City of New Haven's Analysis of Impediments to Fair Housing is a result of a collaborative effort among numerous departments and agencies. In 1996, a multi-departmental committee, comprised of representatives from the Office of Housing and Neighborhood Development (now LCI), Department of Services for Persons with Disabilities, the Office of Management and Budget, the City Plan Department, the Office of Business Development, the Affirmative Action Office, the Commission on Equal Opportunities and the Housing Authority of New Haven, worked together to analyze fair housing and housing choice in New Haven and the surrounding region. Each of these departments and agencies was able to bring a unique and important perspective to the analysis. In addition to committee involvement, community outreach to major employers and housing providers was also conducted through mailings, notices and consultation. These same agencies provided updated material and insight in the preparation of the AI update in 2002. Furthermore, several special studies, including a homelessness study, a housing in the mental health community and a disability needs study have been prepared since the initial AI was prepared.

The majority of the background material included as part of this analysis was collected from other documents and studies previously prepared by City departments and agencies and outside sources. Materials from the City's most recently completed Consolidated Plan for Housing and Community Development Programs; annual performance reports; Empowerment Zone Program documentation; and plans and studies prepared by the City Plan Department provided a strong framework for housing condition and housing activity analysis. This background data, when combined with the fair housing materials provided by the Housing Authority, Disability Services and the Commission on Equal Opportunities, and housing and social service providers in the City provides a picture of housing opportunities and constraints in the City and the region.

2. Conclusions

a. Impediments Found

The City of New Haven has determined through its Analysis of Impediments to Fair Housing Choice that it is in compliance with requirements to affirmatively further fair housing. A continuation of existing programs and the development of new methods to improve housing choice will ensure continued compliance with the requirements embodied in Section 808(e)(5) of the Fair Housing Act and the regulatory requirements of the CDBG, HOME, ESG and HOPWA programs. Improvements to the City's Fair Housing Program will be made as needed in response to improved outreach and education, regional coordination and planning activities, and public input and criticism. The Analysis to Impediments supporting documentation will be kept current to ensure continued compliance and improvement.

b. Actions to Address Impediments

Through the compilation of data and information for its Analysis of Impediments to Fair Housing Choice, few incidences of discriminatory conditions were uncovered.

The major actions which need to occur are those which build upon the City's current programs. Actions to be taken over the next several years, as they relate to fair housing choice include:

- Develop improved recordkeeping system.
- Strive to compile more detailed information on housing issues affecting the City -- including private lending practices.
- Continue to develop new educational and informational outreach programs.
- Improve coordination between the various departments and agencies involved in housing issues and fair housing choice.
- Form a housing task force within the city. This housing task force should include persons who respond to housing needs of the constituents of New Haven. This group should meet on a regular and ongoing basis in order to provide a coordinated and comprehensive approach to the housing needs of persons in New Haven as well as to ensure that Fair Housing Choices are being addressed. At a minimum, representation should include: the Livable City Initiative, the Fair Rent Commission, the Dept. of Services for Persons with Disabilities, a Community Services Representative, a Mayor's Advocate, a representative from Elderly Services, a representative from the Economic Development and the Housing Authority.
- Develop a local Fair Housing Plan based upon the results of the Fair Housing Planning Process spearheaded by the City in response to the **Christian Community Action, Inc v. City of New Haven** settlement agreement approved in the United States District Court for the District of Connecticut on July 1, 1999.
- Actively participate in the Regional Fair Housing Planning process to be undertaken by the South Central Connecticut Regional Council of Governments. Such efforts will help to develop a regional approach to addressing the issues of fair housing and the need for affordable and

supportive housing.

- Continue to pursue regional solutions to relieve the City from the conditions associated with providing the majority of assisted housing and public, social and health service programs in the region.
- Encourage improved means of transportation to provide residents with access to a larger employment region.
- Increase employment opportunities within the City particularly for minorities and other protected classes.
- Continue to encourage homeownership within City neighborhoods to provide both diversity and community stabilization.
- Work to improve the City's image as a place to live as encouragement for families to remain in or return to the City.
- Work to address the housing needs of the disability community.
- Address the Housing Needs of the Disability Community by developing an accurate listing of accessible and adaptable housing units available in the city, participating on the Commission on Regionalism and receiving regular updates and opportunity for participation in these efforts.
- Coordinate with Building Department permit efforts to ensure that the Department of Services for Persons with Disabilities knows about current housing projects.
- Development an accurate listing of accessible and adaptable housing units available in the City, especially within developments and projects assisted with federal, state and local funding. This listing should build upon the existing Housing Authority inventory listing.
- Encourage the creation of more accessible and adaptable housing units.
- Before federal funding is given for housing related projects, coordination with the Department of Services for Persons with Disabilities should occur to ensure that Rehabilitation Act 504 is being implemented.
- The Department of Services for Persons with Disabilities will work closely

with the Housing Authority of New Haven and other city departments in order to encourage landlords to make accessibility modifications.

- Given the fact that persons with disabilities is the largest minority in the US, the Regional Workforce Development Board should have a representative on it's board from the City of New Haven who represents the interests of the Disability Community. A representative from the Dept. of Services for Persons with Disabilities should be invited to serve on the Regional Workforce Development Board.
- Provide housing search assistance resources to help families access housing opportunities in lower poverty neighborhoods of New Haven and its surrounding communities.
- Encourage the development of *permanent* supportive housing options.
- Reduce the incidence of homelessness through preventive measures, including supportive housing services to help currently housed persons maintain their housing.
- Increase the level of services, particularly mental health services, both for persons who are homeless and persons who are currently housed, in order to increase their capacity to access and maintain permanent housing.
- Conduct research to identify the mental health problems of residents, including "lower level" mental health problems such as depression that are too frequently unrecognized and untreated, and develop more effective service provision to help New Haven's families access and maintain appropriate housing.

The City of New Haven is committed to the provision of fair housing choice as evidenced by the numerous programs and activities it supports. As testament to its commitment, the City was one of the first in the nation to create a Commission on Equal Opportunities in 1964 followed by a Fair Housing Program in 1978. Current

Fair Housing programs and activities undertaken within the City by its various departments, agencies, non-profits and advocacy groups exceed those offered by most other communities. Enhancement of these programs coupled with the creation of new activities and techniques meet the objectives of affirmatively furthering fair housing choice.

## **II. BACKGROUND DATA**

## II. BACKGROUND DATA

### A. Demographic Data

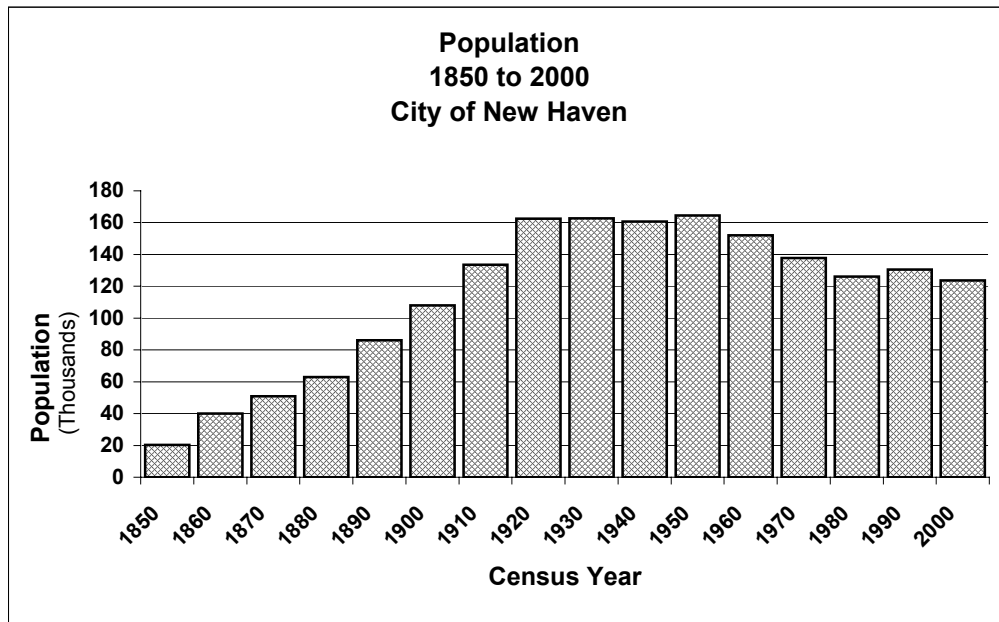
Historically, through the last half of the 1800's and the early 1900's, population in the City of New Haven grew in response to the increase in economic and employment opportunities generated by government war contracts for manufactured products and the City's diversified yet technologically advanced manufacturing industries. New Haven experienced its greatest growth in population between 1890 and 1920 as a result of these employment opportunities -- fueled by federal government contracts for guns and military equipment needed for the Spanish-American War and World War I. Employment opportunities in transportation, government and industries based upon electrical power, as well as businesses serving the needs of Yale University, also contributed to the City's dramatic jump in population between 1890 and 1920. Most of this population growth was comprised of immigrants from Europe and southern Italy as well as black Americans from the south.

From 1920 through 1950 New Haven's population remained relatively stable between 160,000 and 165,000 persons. However, similar to most major cities in the northeast and midwest following the end of World War II, thousands of the City's upper and middle class citizens migrated to surrounding suburbs in search of larger homes, less crowded living conditions and better lives for their families. This out-migration occurred from the late 1940's through the 1980's. As a result, New Haven's population declined from 164,443 in 1950 to 126,109 in 1980. Between the 1980 Census and the 1990 Census, New Haven's population increased slightly to 130,474. Between 1990 and 2000 New Haven's population again declined to 123, 626.

**Population: 1800 to 2000  
City of New Haven**

Census Year	Population
1800	5,157
1850	20,345
1860	40,000
1870	50,840
1880	62,882
1890	86,045
1900	108,027
1910	133,605
1920	162,537
1930	162,655
1940	160,605
1950	164,443
1960	152,048
1970	137,707
1980	126,109
1990	130,474
2000	123,626

Source: U.S. Census Bureau

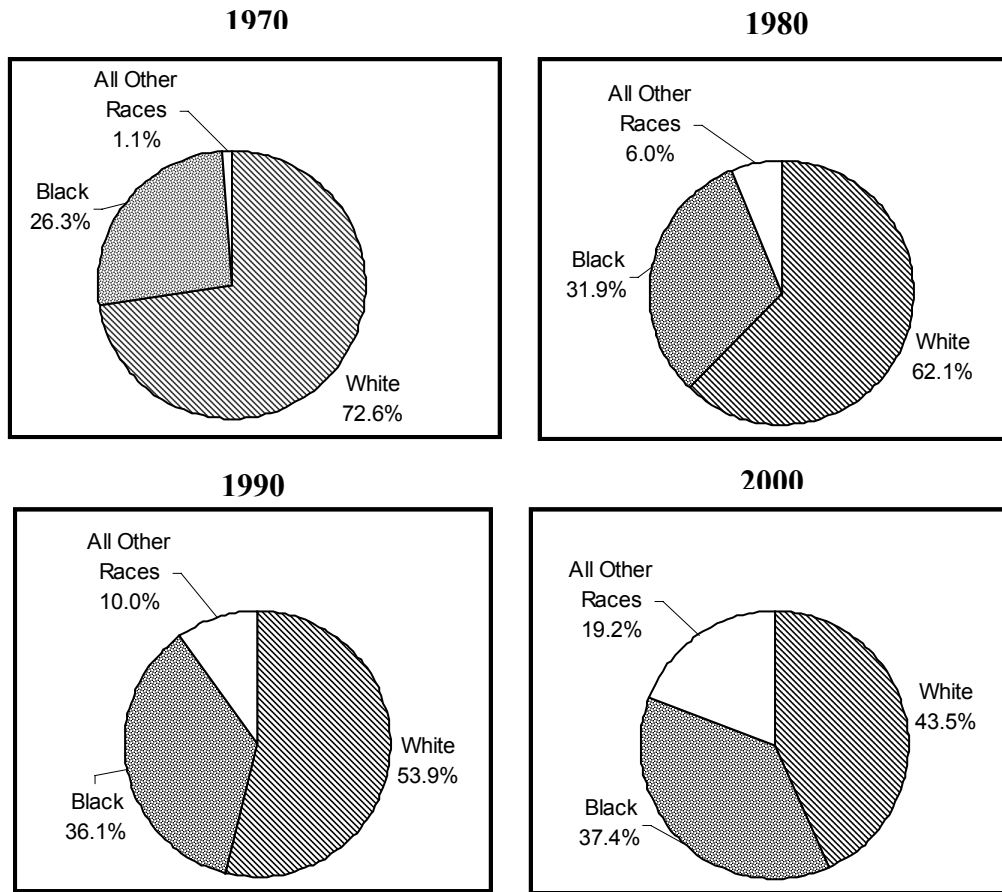


Minority population in New Haven increased significantly between 1970 and 1990. Wherein 1970 minorities comprised 27.4% of the population, by 1990, the City's minority concentration had increased to 46.1%. Between 1970 and 1990, the City's Black population increased by nearly 11,000 persons and other minorities, including American Indians, Asians, Pacific Islander and persons of "other" non-classified races, increased by nearly 11,500 persons. Between the 1990 and 2000 Census the City's minority population again changed significantly. By 2000, the White population comprised only 43.5% of the total City population, while the Black population comprised 37.4% and persons of other racial categories made up 19.2%. As of the 2000 Census, persons of minority races comprised the majority of the City's population.

**Minority Population Change: 1970 to 2000**

	<u>1970</u>	<u>1980</u>	<u>1990</u>	<u>2000</u>
<b>Total Population</b>	137,707	126,109	130,474	123,626
Black	36,158	40,235	47,157	46,181
% Black	26.3	31.9	36.1	37.4
White	99,986	78,326	70,263	53,723
% White	72.6	62.1	53.9	43.5
Other	1,563	7,548	13,054	23,722
% Other	1.1	6.0	10.0	19.2

Source: U.S. Census Bureau



Although persons of Hispanic Origin can be of any racial group, a large percentage of the minorities classified as "other" in New Haven are thought to be of Hispanic origin. The Hispanic population more than doubled between 1970's 4,916 persons and 1980's 10,042 persons. Between 1980 and 1990, the City's Hispanic population grew by an additional 72% to 17,243 persons. By 2000, the Hispanic population increased to 26,443, a 53% increase over the 10-year 1990 to 2000 period.

#### Hispanic Population Change: 1970 to 2000

	<u>1970</u>	<u>1980</u>	<u>1990</u>	<u>2000</u>
<b>Total Population</b>	137,707	126,109	130,474	123,626
Hispanic*	4,916	10,042	17,243	26,443
% Hispanic	3.6	8.0	13.2	21.4
Non-Hispanic	132,791	116,067	113,231	97,183
% Non-Hispanic	96.4	92.0	86.8	78.6

\*Hispanic Population can be of any racial group.

Source: U.S. Census Bureau

Between the 1990 and the 2000 Censuses the City of New Haven posted a loss in total housing units. This loss is attributed to the fact that the City, as part of its Anti-Blight Initiative, demolished vacant, dilapidated and unsafe housing units at a rate faster than the construction of new housing units. At the time this update was being prepared the City was working with the U.S. Bureau of the Census to verify the final Census numbers, however, published statistics show that the number of total housing units in the City declined from 54,057 in 1990 to 52,941 in 2000. The distribution between owner-occupied housing and renter-occupied housing also indicates the changing dynamics of the housing market in New Haven. In 1990, 31.8% of the City's occupied housing units were owner-occupied and 70.4 % were renter-occupied. By 2000, the owner-occupancy rate had dropped to 29.6% and the renter-occupancy rate had increased to 70.4%. The City's Anti-Blight Program and the neighborhood-based outreach and improvement efforts of the Livable City Initiative have been working to address housing and neighborhood issues during the late 1990's and early 2000's. The overarching goals of these programs are to demolish structures which pose threats to the health, safety and welfare of neighborhood residents; improve the physical condition of the City's neighborhoods; promote homeownership; and provide physical improvements and facilities which support new development, economic development and neighborhood revitalization efforts.

The City continues to lose its middle and upper income populations. Over the past decade the City has focused on the promotion of the development of a variety of housing types in an attempt to retain and attract middle and upper income families back to the City. The creation of housing choice and the provision of infrastructure, neighborhood and facility improvements to support the creation of new housing types are the types of programs and projects currently being implemented by the City. The City has been focusing its efforts on improving its schools, the promotion of economic development activities and the physical improvement of its neighborhoods. These efforts if successful will improve the City's image as a desirable place to live and do business.

A review of households and occupancy characteristics according to race and ethnicity as presented in the CHAS Databook distributed by HUD reveals that 43.5% of all households in New Haven at the time of the 1990 Census were minority households. As shown in the following table, the

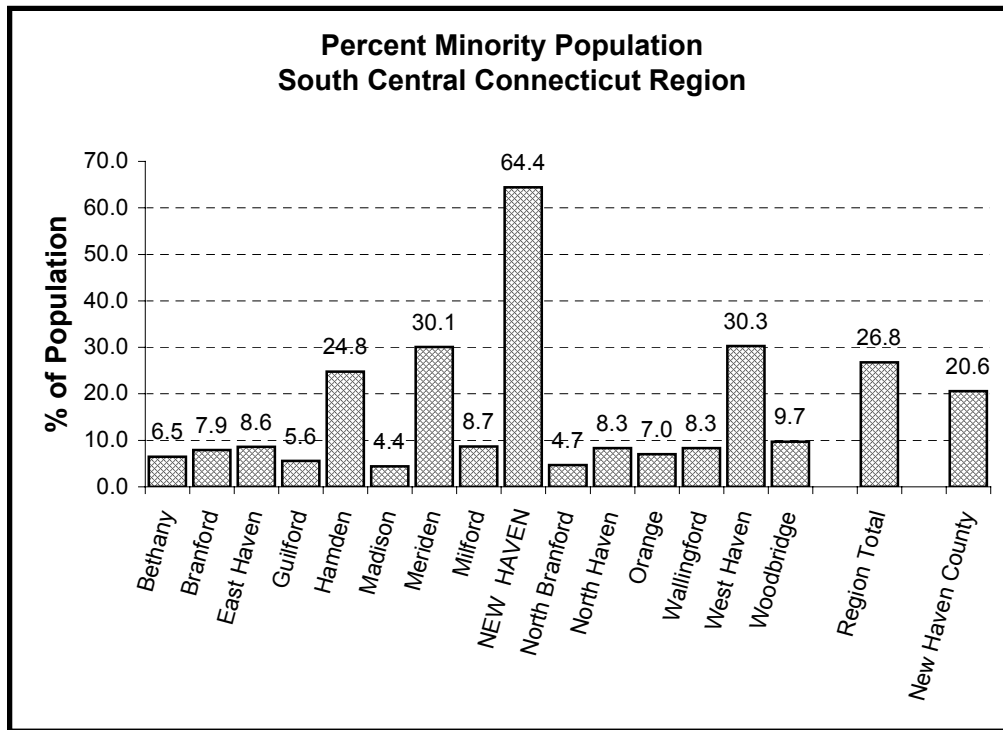
proportional distribution of minority households in both the rental and ownership categories was not significantly different than their proportion of total households. CHAS databook numbers have not been updated since the release of the 2000 Census. HUD has prepared estimates for 2002, however the estimates prepared assume a proportional loss in population across all racial categories. The Census, as described previously, recorded a loss in the White population but an increase in the Black and Hispanic populations between 1990 and 2000.

**Households and Occupancy Characteristics  
by Minority Status  
City of New Haven**

<b><u>Total Households</u></b>	<b><u>1990</u></b>	
	<b><u>No.</u></b>	<b><u>%</u></b>
All Households	48,779	
White Non-Hispanic Households	27,572	56.5
All Minority Households	21,207	43.5
Black Non-Hispanic Households	15,231	31.2
Hispanic Households	4,765	9.7
Native American Households	157	0.3
Asian & Pacific Islander Households	935	1.9
<b><u>Renter Households</u></b>	<b><u>No.</u></b>	<b><u>%</u></b>
All Households	31,834	
All Minority Households	16,042	50.4
Black Non-Hispanic Households	11,282	35.4
Hispanic Households	738	11.7
<b><u>Owner Households</u></b>	<b><u>No.</u></b>	<b><u>%</u></b>
All Households	16,945	
All Minority Households	5,165	30.5
Black Non-Hispanic	3,949	23.3
Hispanic Households	1,027	6.1

Source: HUD CHAS Databook

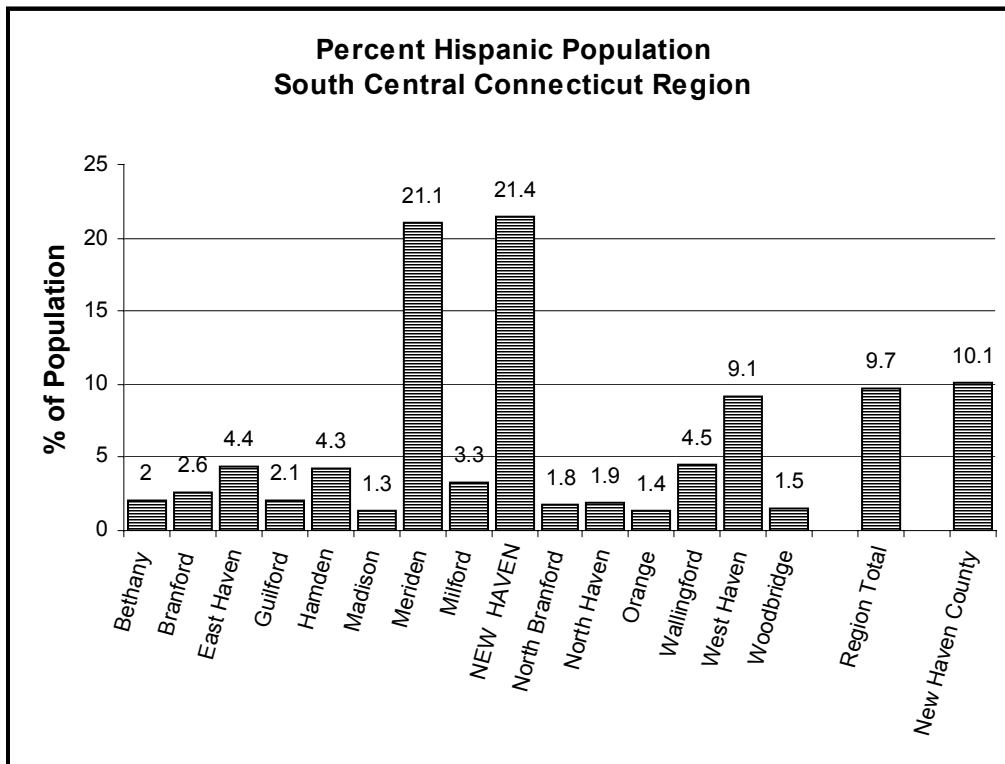
As the urban core of the South Central Connecticut Region New Haven has the largest resident population and the highest concentration of minority population. In 1990, according to Census Bureau Summary Tape File 1A information, New Haven had a minority population of 60,211 which was 46.1% of the population. The Hispanic population, at 17,243, which includes persons of all races, made up 13.2% of the population. By 2000, the City's minority population percentage had increased to 64.4%. The percent Hispanic population increased to 21.1%. As shown on the following graphics these percentages were significantly higher than the surrounding municipalities with the exception of the Hispanic population in Meriden.



**Percent Minority Population: 2000  
South Central Connecticut Region**

	2000 Population	2000 Minority Population	% Minority Population
Bethany	5,040	327	6.5
Branford	28,683	2,259	7.9
East Haven	28,189	2,435	8.6
Guilford	21,398	1,189	5.6
Hamden	56,913	14,101	24.8
Madison	17,858	788	4.4
Meriden	58,244	17,535	30.1
Milford	52,305	4,565	8.7
<b>NEW HAVEN</b>	<b>123,626</b>	<b>79,647</b>	<b>64.4</b>
North Branford	13,906	648	4.7
North Haven	23,035	1,908	8.3
Orange	13,233	921	7.0
Wallingford	43,026	3,568	8.3
West Haven	52,360	15,839	30.3
Woodbridge	8,983	873	9.7
Region Total	546,799	146,603	26.8
New Haven County	824,008	169,764	20.6

Source: 2000 Census; STF1A



### Percent Hispanic Population: 2000 South Central Connecticut Region

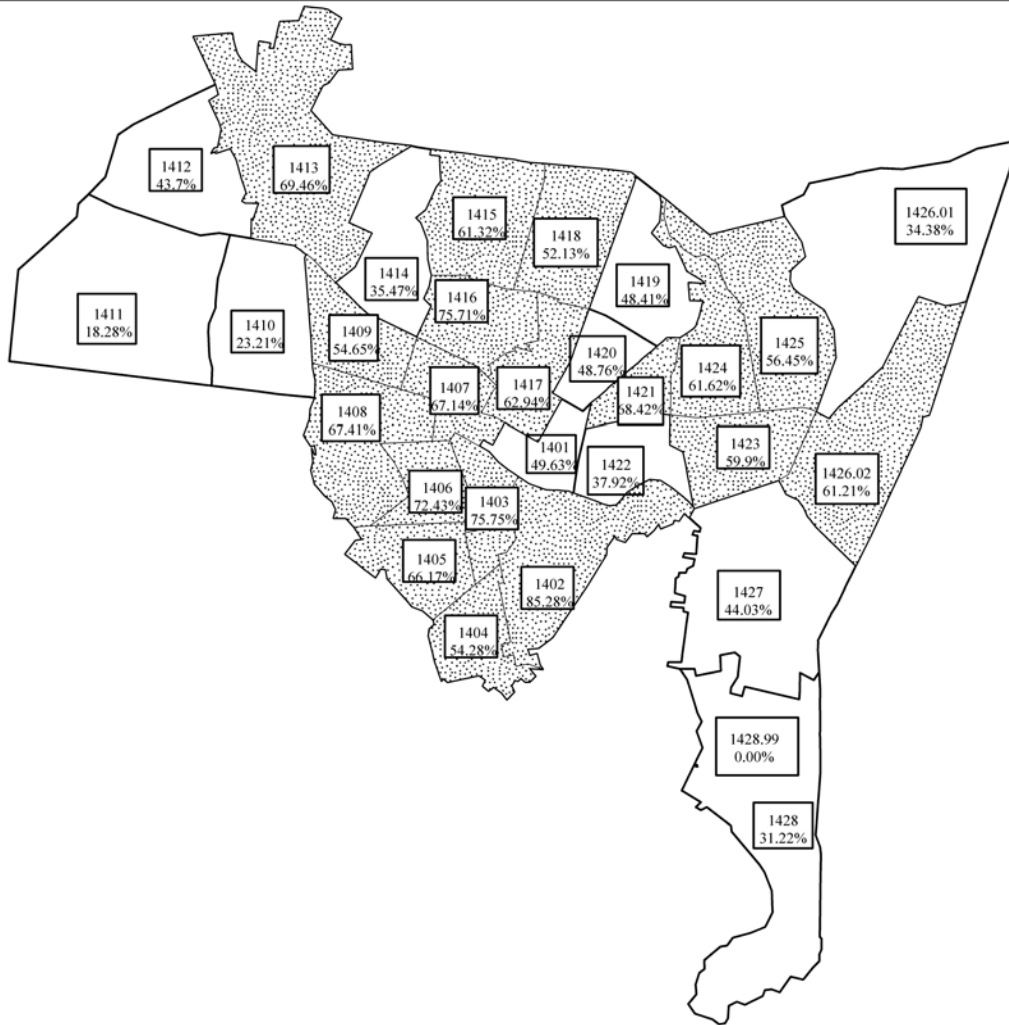
	2000 Population	2000 Hispanic Population	% Hispanic Population
Bethany	5,040	102	2.0
Branford	28,683	737	2.6
East Haven	28,189	1,228	4.4
Guilford	21,398	455	2.1
Hamden	56,913	2,425	4.3
Madison	17,858	240	1.3
Meriden	58,244	12,296	21.1
Milford	52,305	1,750	3.3
<b>NEW HAVEN</b>	<b>123,626</b>	<b>26,443</b>	<b>21.4</b>
North Branford	13,906	250	1.8
North Haven	23,035	433	1.9
Orange	13,233	190	1.4
Wallingford	43,026	1,946	4.5
West Haven	52,360	4,757	9.1
Woodbridge	8,983	138	1.5
Region Total	546,799	53,390	9.7
New Haven County	824,008	83,131	10.1

Source: 2000 Census; STF1A



On a regional basis, when analyzing minority concentrations by census tract, New Haven and a few contiguous census tracts in West Haven and Hamden contain the majority of the Greater New Haven minority population.

The two City maps which follow the regional map were included as part of the City's Consolidated Plan for Housing and Community Development. They depict the 1990 census tracts with the highest percentages of minority and low/moderate income population in the City. These maps are used by the City to guide the distribution of housing and community development resources and analysis of programs and activities within the City under various U.S. Department of Housing and Urban Development (HUD) and State of Connecticut Department of Economic and Community Development grant programs. HUD has yet to release new low- and moderate-income statistics based upon the 2000 Census.

# TRACTS WITH LOW/MOD CONCENTRATIONS OVER 51%





## LEGEND

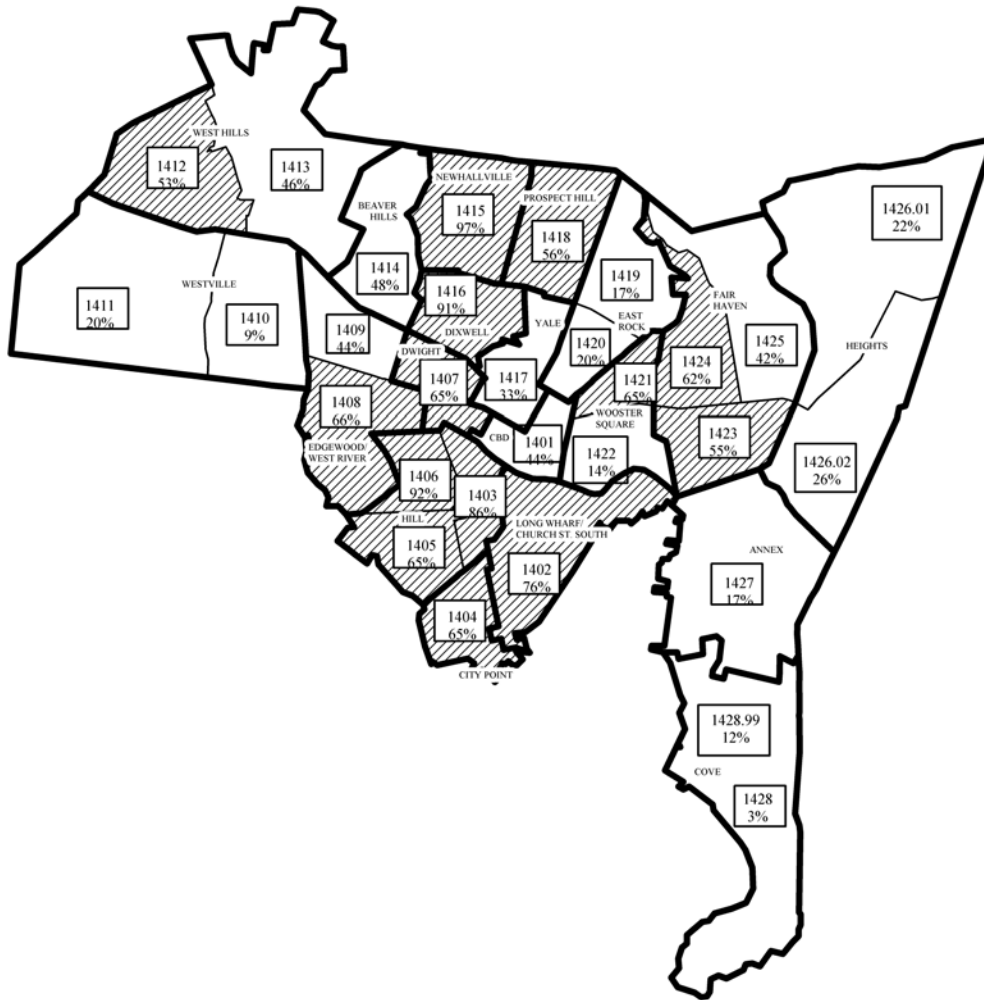
-  CENSUS TRACT
-  TRACTS WITH OVER 51% LOW/MOD



# MINORITY POPULATION PERCENTAGE GREATER THAN 50%

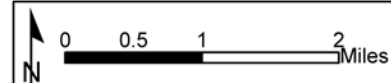
## LEGEND

-  CENSUS TRACT
-  NEIGHBORHOOD BOUNDARIES



## MINORITY CONCENTRATIONS

-  GREATER THAN 50%



## B. Income Data

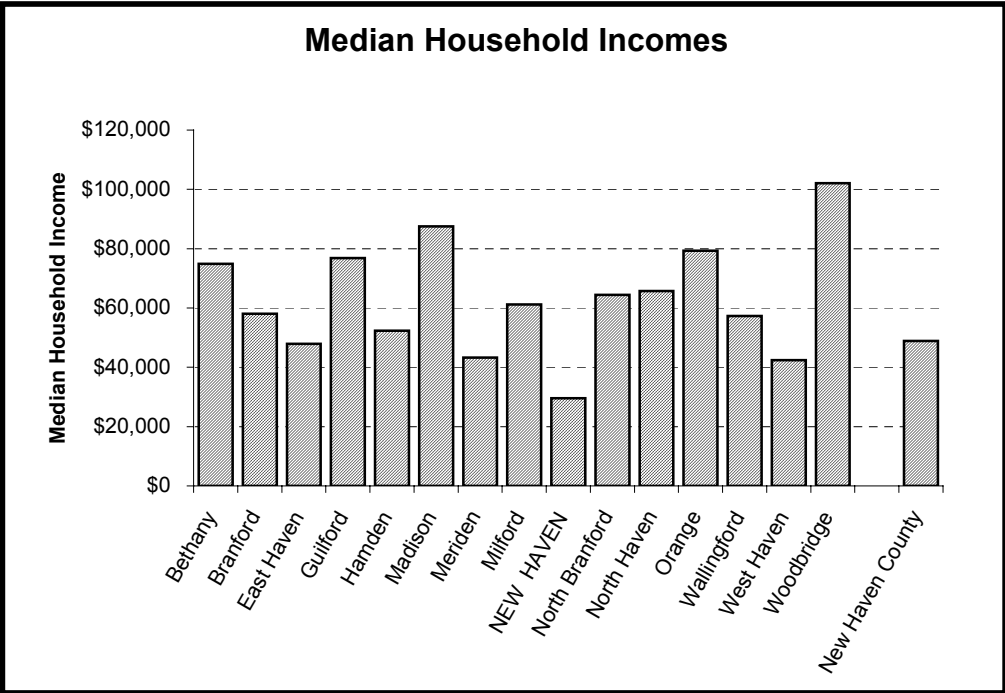
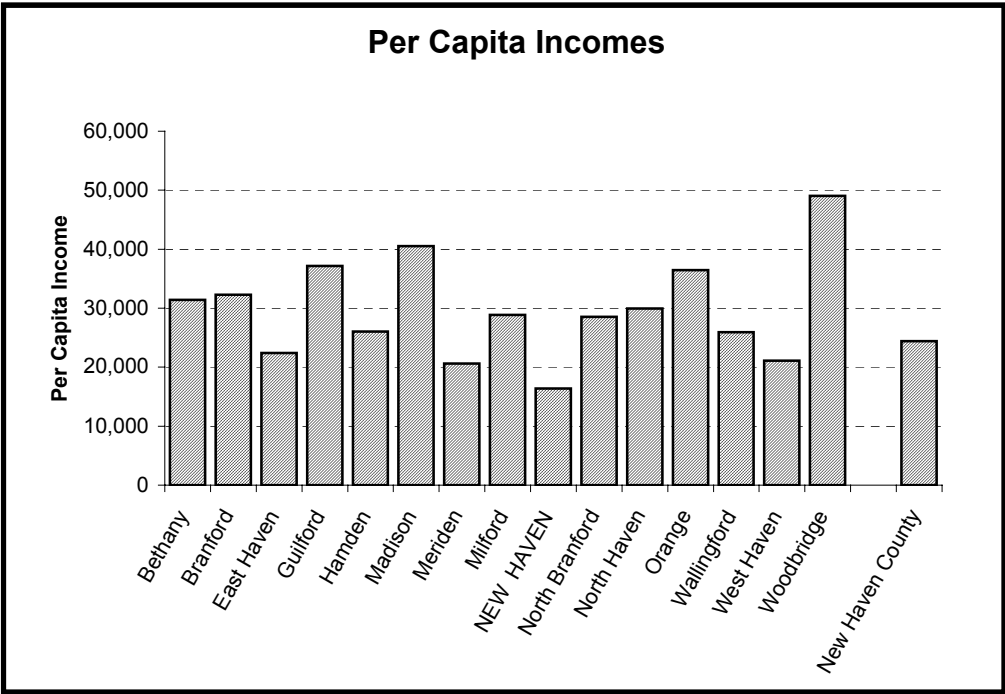
The City of New Haven has the lowest median household, median family and per capita income levels of all of the municipalities in the South Central Connecticut Region. According to 2000 Census statistics, New Haven had a median household income of \$29,640, a median family income of \$35,950 and a per capita income of \$16,393.

Charts, which compare New Haven with the surrounding municipalities follow this page.

### Median Household, Median Family and Per Capita Incomes: 2000 South Central Connecticut Region

	Median Household Income \$	Median Family Income \$	Per Capita Income \$
Bethany	\$74,898	79,493	31,403
Branford	58,009	69,510	32,301
East Haven	47,930	56,803	22,396
Guilford	76,843	87,045	37,161
Hamden	52,351	65,301	26,039
Madison	87,497	101,297	40,537
Meriden	43,237	52,788	20,597
Milford	61,183	71,226	28,882
<b>NEW HAVEN</b>	<b>29,604</b>	<b>35,950</b>	<b>16,393</b>
North Branford	64,438	71,813	28,542
North Haven	65,703	73,041	29,919
Orange	79,365	88,583	36,471
Wallingford	57,308	68,327	25,947
West Haven	42,393	51,631	21,121
Woodbridge	102,121	111,729	49,049
New Haven County	48,834	60,549	24,439

Source: 2000 Census; STF3A



**Median Household, Median Family and Per Capita Income  
2000 Census Tracts: City of New Haven**

<b>Census Tract</b>	<b>Median Household Income (\$)</b>	<b>Median Family Income (\$)</b>	<b>Per Capita Income (\$)</b>
1401	22,377	33,250	19,916
1402	11,004	12,893	10,518
1403	32,639	37,917	10,897
1404	29,590	29,464	13,942
1405	23,185	23,679	10,429
1406	22,500	30,871	10,573
1407	16,732	26,740	13,155
1408	20,298	24,657	14,093
1409	37,350	43,207	18,614
1410	51,267	74,500	33,526
1411	63,640	74,063	30,302
1412	33,490	32,255	16,896
1413	18,549	18,055	11,122
1414	36,918	45,602	17,993
1415	30,938	33,750	14,401
1416	23,994	31,406	12,694
1417	20,375	34,844	6,280
1418	34,038	48,750	24,975
1419	44,831	58,583	27,065
1420	28,125	56,250	29,946
1421	23,194	19,280	11,706
1422	40,078	42,500	27,523
1423	23,693	28,686	11,020
1424	22,986	24,659	11,741
1425	22,101	23,190	10,762
1426.01	37,356	43,214	18,681
1426.02	19,094	33,470	14,456
1427	32,516	36,657	17,210
1428	49,877	54,219	24,352

Source: 2000 Census; STF3A

**C. Employment Data**

The Connecticut Department of Labor publishes labor and employment characteristics for the State, its regions and individual municipalities on an annual basis. According to Labor Department statistics, in June of 1994, 75,830 persons were employed in non-agricultural employment positions in New Haven. Fifty percent (50%) (almost 38,000) of the persons employed in New Haven worked in the service industry. The more than 10,000 employees in government positions (13.7%) and the near 8,000 employees in the transportation, communication and public utility industry accounted for the second and third most prominent employment industries in the City. The most recent statistics available at the time of this update are for 2001. As of June 2001, near 78,000 persons were employed in non-agricultural employment positions in New Haven – close to a 2,000 job increase since the mid-1990’s. Although some of the employment numbers are suppressed as a means to ensure the privacy of individual firms, the Services Industry posted the greatest gain in employment.

**City of New Haven  
Non-Agricultural Employment Statistics  
June 1994 & June 2001**

	<u>1994</u>		<u>2001</u>	
Construction	1,250	1.6%	1,280	1.6%
Manufacturing	6,140	8.1%	5,070	6.5%
Transportation, Communications, & Public Utilities	7,730	10.2%	*	*
Wholesale Trade	1,670	2.2%	1,320	1.7%
Retail Trade	6,650	8.7%	6,340	8.3%
Finance, Insurance & Real Estate	4,040	5.3%	*	*
Services	37,930	50.0%	43,160	55.4%
Government	<u>10,430</u>	<u>13.7%</u>	<u>11,770</u>	<u>15.1%</u>
	75,830	100.0%	77,920	100.0%

Source: State of Connecticut, Department of Labor

The leading employers in the City of New Haven are as follows:

**Leading Employers  
City of New Haven**

<b><u>Name</u></b>	<b><u>Type</u></b>	<b><u>Full-Time Employment</u></b>
Yale University	Educational	10,000
Yale New Haven Hospital	Health Care	5,800
Hospital of St. Raphael	Health Care	3,400
Southern CT State University	Educational	1,600
Sargent/Assa Ablay USA	Manufacturing	750
SNET	Telecommunications	700
Dunhill Personnel of New Haven	Services	650
New Haven Register	Publishing	620
Knights of Columbus	Fraternal, Insurance	600
APT Foundation	Social Services	600
Gateway Community College	Educational	500
Pirelli Armstrong Tire Corp.	Manufacturing	361
CuraGen Corp.	Pharmaceuticals	350
US Repeating Arms	Manufacturing	340
American Medical Response	Emergency Services	300
Center for Optimum Care	Health Care	280
Priority Care Inc.	Health Care	250
Dimeo Construction Co.	Construction	180
Genaissance Pharmaceuticals	Pharmaceuticals	175
C.A. White	Real Estate	110
FJ Dahill Co., Inc.	Construction	90
New Haven Partitions	Construction	80
Molecular Staging	Technology/Bioscience	72
Wilbur Smith Associates	Professional Services	70
Herbert S. Newman & Partners	Professional Services	52
CJ Fucci Inc.	Construction	65

Source: Business New Haven, May 2001

The City of New Haven has traditionally been the employment center of the region. With the completion of Interstates 91 and 95 however, more employers began to locate outside of the City where larger parcels of land were available for industrial, office and retail development.

This shift in employment locations began to occur at the same time middle and upper income New Haven families began to move to outlying suburbs in the region. Even though many employment opportunities in New Haven left the City, today, as shown in the following table, New Haven continues to provide the majority of the region's employment. According to State of Connecticut Department of Labor Statistics for June, 2001, there were 77,920 jobs in New Haven. At the same point in time, 54,437 New Haven residents were employed. Although not all City residents are employed in jobs in the City the ratio of

employment positions to employed residents gives a picture of the balance between employment and resident population. The ratio of employment positions to employed residents in New Haven in 2001 was 1.43. Only three other communities in the New Haven region had more employment positions than employed residents. These were North Haven, Orange and Wallingford.

**Total Non-Agricultural Employment by Town  
New Haven Labor Market Area: 2001**

	<b>June 2001 Total Non-Farm Employment in Town</b>	<b>Residents Employed</b>	<b>Ratio Jobs to Employed Residents</b>	<b>2001 Unemployed Residents*</b>
Bethany	1,050	2,544	.41	59
Branford	13,640	15,450	.88	441
East Haven	6,810	14,308	.48	487
Guilford	6,280	11,342	.55	240
Hamden	19,680	28,332	.69	841
Madison	4,950	8,180	.60	164
Meriden	26,250	28,732	.91	1,245
New Haven	77,920	54,437	1.43	2,440
North Branford	5,020	7,962	.63	208
North Haven	21,540	12,086	1.78	295
Orange	9,540	6,401	1.49	132
Wallingford	25,180	22,198	1.13	700
West Haven	17,440	27,236	.64	1,029
Woodbridge	3,150	4,255	.74	70

\* The number of unemployed residents includes persons who did not work but who were actively seeking employment and persons waiting to be recalled to a job from which they had been laid off. Persons with no jobs and who were not actively looking for one were not included in this figure.

An analysis of the Journey to Work statistics derived from the 1990 Census and compiled by the Connecticut Department of Transportation further highlights the commuting and employment characteristics of the region. The 2000 Census, Journey to Work Special File, Census Transportation Planning Package (CTPP) has not been released. The tables which follow depict characteristics from the 1990 Census of work trips originating in New Haven for all destinations and for destinations within the South Central Connecticut region as well as work trips to employment destinations in New Haven from all areas and from communities in the region. In summary, according to these tables, at the time of the 1990 Census 32,816 persons or 60% of the 54,758 employed persons traveling to work from New Haven both lived and worked in the City.

Hamden, North Haven and West Haven were the most prominent employment destinations outside of the city for New Haven residents although the actual numbers were only in the 2,000 to 3,500 job range.

**Journey To Work – 1990\***  
**Trips Originating in New Haven**

<u>Destination</u>	<u>No</u>	<u>%</u>
Southwestern CT	743	1.3
Housatonic Valley	154	0.3
Northwestern CT	24	*
Litchfield Hills	15	*
Central Naugatuck Valley	574	1.0
Valley	536	0.9
Greater Bridgeport	1,970	3.6
South Central	48,606	88.7
Central CT	126	0.2
Capitol	953	1.7
Midstate	284	0.5
Connecticut River	168	0.3
Southeastern	84	0.1
Northeastern	8	**
Massachusetts	87	0.1
New Jersey	67	0.1
New York	354	0.6
Rhode Island	5	**
	<u>54,758</u>	

\* the 2000 Census, Journey to Work Special File, Census Transportation Planning Package (CTPP) has not been released

\*\* Less than 0.1%

**Origin - New Haven  
to Municipalities within South Central Region**

<u>Destination</u>	<u>No.</u>	<u>%</u>
Bethany	97	0.2
Branford	1,116	2.3
East Haven	1,228	2.5
Guilford	320	0.6
Hamden	3,300	6.8
Madison	217	0.4
Meriden	309	0.6
New Haven	32,816	67.5
North Branford	210	0.4
North Haven	3,227	6.6
Orange	644	1.3
Wallingford	690	1.4
West Haven	2,318	4.7
Woodbridge	440	0.9
	<u>48,606</u>	

As the employment center in the region, in 1990, 51,666 persons or 61% of all persons employed by New Haven companies came from surrounding municipalities and regions. Eighty-five percent (85%) resided in the South Central region with Hamden (8,870 persons), West Haven (6,518), East Haven (4,406) and Branford (4,122) being the residence municipality of the largest number of persons commuting into New Haven for employment.

**Journey To Work – 1990\***  
**Trips with Destination of New Haven**

<u>Origin</u>	<u>No.</u>	<u>%</u>
Southwestern CT	482	0.5
Housatonic Valley	290	0.3
Northwestern CT	34	**
Litchfield Hills	131	0.2
Central Naugatuck Valley	3,006	3.6
Valley	2,028	2.4
Greater Bridgeport	1,814	2.1
South Central	71,784	85.0
Central	701	0.8
Capitol	1,025	1.2
Midstate	802	0.9
Connecticut River	1,367	1.6
Southeastern	223	0.3
Windham	105	0.1
Northeastern	7	**
Massachusetts	181	0.2
New Jersey	129	0.1
New York	300	0.4
Rhode Island	69	**
	<u>84,482</u>	

**Destination - New Haven**  
**from Municipalities within South Central CT Region**

<u>Origin</u>	<u>No.</u>	<u>%</u>
Bethany	486	0.7
Branford	4,122	5.7
East Haven	4,406	6.1
Guilford	2,299	3.2
Hamden	8,870	12.3
Madison	1,191	1.7
Meriden	875	1.2
New Haven	32,816	45.7
North Branford	1,413	2.0
North Haven	2,637	3.7
Orange	1,207	1.7
Wallingford	1,991	2.8
West Haven	6,518	9.1
Woodbridge	<u>1,297</u>	1.8
	<u>71,784</u>	

\* the 2000 Census, Journey to Work Special File, Census Transportation Planning Package (CTPP) has not been released

\*\* Less than 0.1%

Although a large percentage of the jobs in the region are located in New Haven one of the greatest impediments to employment by City residents is the lack of public transportation to outlying areas. As the City of New Haven contains the majority of the region's minority and lower income households it is important to provide a variety of transportation opportunities. Currently, New Haven is serviced by public bus service and rail service. Although these services increase opportunity there are still outlying employment areas that are not yet accessible or to which the cost or length of travel time is a barrier to access by City residents in need of transportation.

To understand minority employment by the major employers in New Haven in greater detail, summary Equal Employment Opportunity statistics were requested from the City's major employers. By their nature and location the majority of these employers had minority employee percentages in excess of the 16.8% minority civilian labor force population in the New Haven MSA. A copy of the Equal Employment Indicator Statistics for the New Haven MSA as published by the Connecticut Labor Department is included as part of this report. Summary statistics received from major employers will be kept on file as part of the City's Analysis to Impediments documentation.

The 2000 Census Equal Employment Opportunity Special File has not yet been released. A Consortium of four Federal agencies consisting of the Equal Employment Opportunity Commission (EEOC), Department of Justice (DOJ), Department of Labor (DOL) and Office of Personnel Management (OPM) has entered into an agreement with the Census Bureau to create a special tabulation, the Census 2000 Special EEO File. The Federal Consortium and the U.S. Bureau of the Census intend to formally present information on the Census 2000 Special EEO File during an open forum to be held in the Fall of 2002. Results of this special tabulation will be included in the next update of the City's Analysis of Impediments. Copies of the data for the New Haven MSA will be kept on file as part of the City's Analysis to Impediments documentation.

#### **D. Housing Profile**

The majority of the data included in this section is taken from the City's Consolidated Plan for Housing and Development 2000-2004. Census 2000 statistics have also been included as appropriate. Additional data and supporting documentation has been added to assist in the analysis of impediments to fair housing choice.

##### **General Characteristics**

According to the 2000 Census, there are 52,941 housing units in the City of which 47,094 (89.0%) are occupied and 5,847 (11.0%) are vacant. Based upon Census statistics, there are fewer housing units in the City today than there were in 1990 (54,057 housing units in 1990). The percentage of vacant units has also increased from 9.4% of the total to 11.0% of the total in 2000.

Distressed and blighted housing continue to be core issues related to neighborhood planning in New Haven. While no single factor causes distress and blight, it is apparent that a combination of poor structural condition, limited land area and the general neighborhood environment (public safety, aesthetics, etc.) all contribute to blighting conditions.

According to the 2000 LCI / Fire Department Building Survey, there are 596 vacant structures in New Haven. This is down significantly from the 751 reported in 1999 in the Consolidated Plan. By neighborhood, the Hill (194), Fair Haven (84) and Newhallville (61) have the largest aggregate numbers of vacant buildings. Similarly, there is a high incidence of properties in some stage of municipal foreclosure in the Hill, Newhallville and Fair Haven. Also, Dixwell and West River have high foreclosure rates relative to the number of parcels in the neighborhood.

There are a number of similarities in the neighborhoods with high levels of distressed housing. The Hill, Newhallville and Fair Haven are older, denser neighborhoods. All three are Empowerment Zone neighborhoods, reflecting lower income levels in the community. As such, there is a wide set of needs ranging from small paint / improvement programs to marketing for the transition to new homeowners. Often the market for new homeowners is limited to the local population as the availability of inner city homes is not as well known on a regional basis.

Most of the City's housing stock is contained in structures with two to four units. Of the 52,941 housing units enumerated by the 2000 Census, 21,879 (41%) are in two to four family dwellings. Single-family dwellings are in traditional detached (20%) or townhouse or condominium (4.8%) configurations. Buildings with more than 5 units represent 33.7% of all housing units (17,869 units).

In New Haven 70.4% of all occupied dwelling units are renter occupied. The remaining 29.6% or 13,927 are owner-occupied. Over the decade between the 1990 Census and the 2000 Census the number of owner occupied units decreased. In 1990, 15,569 housing units were owner occupied - more than 1,600 more owner-occupied units than in 2000. The City's eastern and western most Census Tracts have the highest homeownership percentages. While the current owner/renter ratio is not unusual for a city the size of New Haven, the City has increased its emphasis on providing ownership opportunities as a way of increasing housing choices, stabilizing neighborhoods and encouraging a better mix of incomes within the City. As an important bellweather statistic of neighborhood planning, increasing the number of homeowners is a longstanding policy in the city. The policy is appropriate given the relationship between homeownership and neighborhood stability. Homeowners have a long-term stake in the community, contribute directly to the property tax base and are on-site stewards of real estate.

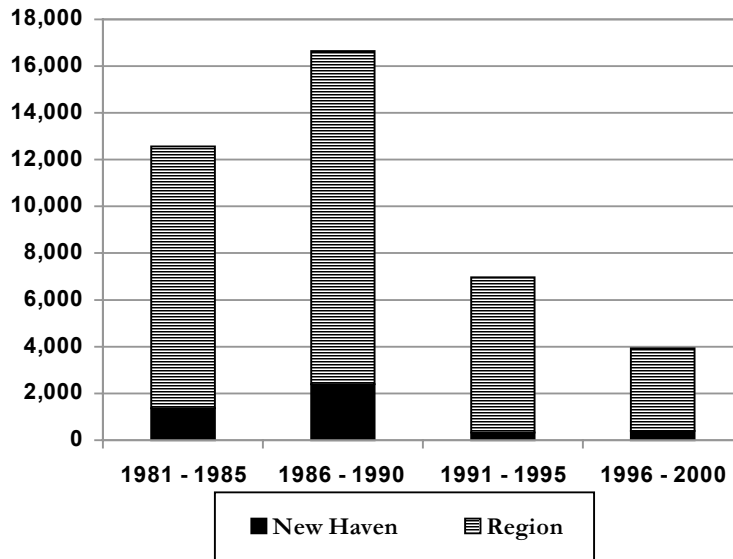
As an older city, 37% of the New Haven's housing units were constructed before 1940, 62% were completed before 1960 and 88% were built prior to 1980. While creating a remarkable urban fabric for preservationists and students of American architecture, the costs of maintaining, renovating and preserving the older housing stock often places a severe economic burden on those least able to afford these costs. Negative aspects affecting the housing stock are inherent with the age and type of construction materials. The vast majority of residential structures are stick built with clapboard or shingle exteriors. Weather conditions and high energy costs add to the total housing expenses. Many older homes have also a myriad of Building or Housing Code problems. Heating, plumbing and electrical systems may have been updated since original occupancy but may not be a fully code compliant due to recent changes.

During the mid- to late-1990's the City of New Haven implemented an Anti-Blight Campaign that focused on the demolition of seriously deteriorated structures which posed a threat to public health and safety. Lots cleared of deteriorated structures were made available to adjacent property owners under the Sliver Lot Program to be used for side yards and/or off street parking. In some instances, cleared properties were used to provide public benefit such as pocket parks, community gardens, neighborhood public facilities or economic development opportunity. The Anti-Blight Program was partially responsible for the decline in the number of housing units in the City. For the most part, the units demolished under this program were not suited for occupancy, rehabilitation or reuse.

In 1999, housing permit activity in New Haven, relative to the size of the housing stock, lagged behind both state and regional averages. Moreover, the city's share of the south central regional housing market is growing smaller. Over the past 20 years, urban development has expanded well beyond the urban core. From 1981 - 1985, permit activity in New Haven accounted for 12.2% of all permits in the South Central region. By 1996 - 2000, however, New Haven's share of regional permit activity declined to 5.5%. Regional land consumption for urban development has increased dramatically as well. According to the South Central Regional Council of Government's regional land use plan, urban development in the outer suburbs increased 10% from 1970 to 1990.

In spite of the maturity of the New Haven market, the lack of available land for subdivisions and intensive new construction, there remains a healthy amount of activity in the city. In 1999, the city issued 234 new housing permits. Of these, 173 were for new single-unit homes – highest among the state's major cities for that year. The demand for single-unit housing reflects a demand for contemporary trends toward homeownership, but within the context of an urban area.

### New Haven's Share of the Region's Permit Activity, 1981 - 2000



The value of all permitted residential construction in 1999 in Connecticut totaled over \$1.4 billion. The South Central region's share of this value was \$165 million (11%). The value of permits in New Haven was significantly lower than the state average and among the lowest municipalities in the region, placing 11<sup>th</sup> overall and 13<sup>th</sup> in single-unit value.

### Public And Assisted Housing

The City of New Haven offers a wide selection of affordable and assisted housing opportunities. As one of the original Model Cities, New Haven received a great number of housing development grants through the 1980s. Tax credits, mortgage revenue bonds, Section 202 elderly development programs, and Urban Development Action Grants are some of the vehicles that have aided in the development of affordable housing. The City has a high rate of subsidized housing: approximately 30% of the total housing units in the City are subsidized in some manner. The total stock of subsidized and assisted housing units in the City, as of November 2002, include the following:

***Inventory of Subsidized and Assisted Housing (November 2002)***

	<b>Rental Units</b>	<b>Owner Units</b>
<b>Public Housing</b>		
HANH-managed		
Family units	1,683	
Elderly/Disabled units	1,101	
Scattered Site	154	
Elm Haven/Monterey Place *		
Family units *	180	
Elderly units *	144	
Total Public Housing Units	<b>3,262</b>	
Monterey Place homeownership units*		<b>53</b>
<b>Tenant-Based Assistance</b>		
HANH Section 8 Program	3,550	
State Section 8 Program	1,011	
State Rental Assistance Program(RAP) & TRAP	708	
Total Tenant-Based Assistance Units	<b>5,269</b>	
<b>Project-Based Assistance</b>		
SRO	80	
Total Project-Based Assistance Units	<b>80</b>	
<b>Total Subsidized or Assisted Units</b>	<b>8,611</b>	<b>53</b>

*\*Elm Haven unit counts are projected. The project is still under construction but is 90% complete.*

The Housing Authority of the City of New Haven (HANH) administers the majority of subsidized housing resources in the City of New Haven. Public housing units administered by HANH constitute approximately 8% of the City’s total rental housing units, and HANH’s total Section 8 voucher stock would subsidize an additional 9% of rental units.

***HANH Background***

In the past five years, HANH has worked successfully to overcome years as a mismanaged agency. After several years on HUD’s troubled agency list, HUD planned federal receivership of HANH. New Haven’s Mayor, John DeStefano, Jr. brokered HANH’s turn-around, appointing Robert Solomon as Interim Executive Director in 1998 and, in 2002, former HANH Commissioner, Stephen T. Yandle. During this interim period, HANH has undergone an agency-wide reorganization of all operations and has demonstrated its ability to effectively administer federal housing assistance. In HUD’s annual Public Housing Assessment System (PHAS), HANH’s scores have climbed from 33.7

(out of 100) in 1999 to 80.0 in 2001. In recognition of its capacity, HUD has awarded HANH status as a Moving-to-Work agency, a designation that permits HANH to receive waivers from certain federal regulations in order to administer its resources in the manner most responsive to local needs.

Under its current administration, HANH has developed long-term asset management strategies for each public housing development in its portfolio, including the development and expansion of permanent supportive housing units, elderly designation of a portion of units, the conversion of an existing development into an assisted living facility, and major reconstruction or renovations of other developments. HANH's asset management strategies were developed in accord with the City's Consolidated Plan and the needs of the City's low-income population. HANH's goal is to transform its aging housing stock into "housing of choice" responsive to the needs of New Haven's low-income households.

#### **New Haven Public Housing Units**

The Housing Authority manages 2,784 public housing units in 28 developments: 1,683 units in 14 family developments, and 1,101 units in 14 "mixed population" developments open to elderly persons and persons with disabilities. Ninety-six percent (96%) of occupant households have incomes below 50% of MHI, and 89% of households are extremely low income, with annual incomes below 30% of MHI.

Routine vacancies account for approximately 4% of HANH's housing stock. In addition, HANH is currently engaged in several major redevelopment and modernization projects which have required that approximately 700 of HANH's units are not available for occupancy.

***Accessible Units***

HANH’s public housing stock includes 79 accessible units. The unit mix of accessible units is as follows:

**Housing Authority of New Haven  
Accessible Public Housing Units**

<b>Bedroom Size</b>	<b>Number Units</b>
Efficiency	5
1 Bedroom	23
2 Bedrooms	12
3 Bedrooms	11
4 Bedrooms	16
5 Bedrooms	12
<b>Total Accessible Units</b>	<b>79</b>

As required by federal regulation, any major renovation projects are governed by a transition plan for increasing the supply of accessible units. HANH currently is planning 6 major renovation of redevelopment projects. One project, Eastview Terrace renovations, is still in the early design stages, and HANH does not yet have a projected number of resulting accessible units. For the other five projects, the projected number of accessible units is as follows:

**Increase in Accessible Units Due to Scheduled Renovations  
Housing Authority of New Haven**

<b>Development</b>	<b>Current # of Accessible Units</b>	<b>Projected # of Accessible Units</b>	<b>Projected Increase in Units</b>
Prescott Bush Mall	3	29	26
C.B. Motley	0	28	28
K. Harvey Terrace	6	9	3
Newhall Gardens	0	10	10
Quinnipiac Terrace	0	38	38
<b>Totals</b>	<b>9</b>	<b>114</b>	<b>105</b>

During FY 2003, HANH’s Department of Construction and Design Management will be conducting an evaluation of each accessible unit to ensure that each meets current code requirements.

HANH maintains a separate waiting list for its accessible units.

HANH’s housing stock also includes specific units modified to accommodate persons with visual and/or hearing impairments. It is HANH’s policy to modify any unit occupied by persons with visual and/or hearing impairments.

***Public Housing Units Not Managed by HANH***

In addition to HANH-managed units, 324 subsidized rental units at the Elm Haven/Monterey Place development (a HOPE VI redevelopment) are managed by BCJ Management, and 154 scattered-site units are managed by HOME, Inc.

- ***Elm Haven/Monterey Place Public Housing Units:*** HANH was awarded a HOPE VI grant for the revitalization of its former Elm Haven, New Haven’s oldest public housing development. The new Monterey Place development, with 392 total projected housing units, is managed by BCJ Management. This mixed income community has brand new rental units, both market-rate and subsidized, plus 53 homeownership units and two substantially renovated elderly buildings. Monterey Place offers attractive, quality affordable housing in a mixed-income community with stronger connections to surrounding neighbors, including Yale University.

Redevelopment activities are still in progress. As of November 2002, Monterey Place is 90% completed. The total projected unit mix is as follows:

<b>Elm Haven/Monterey Place Unit Mix</b>	
	<b>Total Projected Units</b>
Public Housing/LIHTC Units	
Family units	180
Elderly units	144
Homeownership Units	53
Market-rate Units (family units)	15
<b>Total Units</b>	<b>392</b>

- ***Scattered Site Public Housing Units:*** Under the settlement agreement of *CCA v. Cisneros*, HANH has committed to developing 183 “scattered site” public housing units in non-impacted

neighborhoods of New Haven (neighborhoods with a minority concentration of 51% or less). At present, HANH has acquired 154 scattered site units and is working aggressively to identify and acquire or build 29 additional units in appropriate neighborhoods. HANH's scattered site units are managed by HOME, Inc. The scattered site units are traditional public housing units, but admissions are limited to transfers from HANH's current public housing residents, with priority given to public housing families who participate in HANH's Family Self-Sufficiency Program. HANH's scattered site units offer an attractive affordable housing option: they are sited in working communities with higher income levels, and the public housing units are generally indistinguishable from the surrounding housing.

***HANH Initiatives to Expand Housing Choice and Access to Quality Affordable Housing Opportunities for Low Income Families***

During the past five years, HANH has developed asset management strategies for each public housing development in its portfolio with the purpose of transforming its public housing stock into "housing of choice" responsive to the housing needs of low income families in the City of New Haven. These include development activities to increase the supply of quality affordable housing, and programming to help families access a broader range of housing opportunities.

- ***Site-Based Management.*** Since 1997, HANH has undergone an agency-wide reorganization with a focus on empowering--and holding accountable--a site-based management staff responsible for day-to-day operations and maintenance of each public housing development. At present, HANH employs five Asset Management teams, each responsible for a district of three or more public housing developments, and beginning FY 2002 has implemented site-based budgeting. Each Asset Manager is responsible for developing priorities for responding to the needs of his/her particular developments. Substantial improvements are already apparent in maintenance work orders, grounds conditions including litter, facilities improvements, and site control including reductions in inappropriate or illegal behavior.
- ***Site-Based Waiting Lists.*** In accord with HANH's goal of transforming its public housing developments into housing of choice, HANH is implementing site-based waiting lists. HANH's site-based waiting lists are intended to provide families with greater choice in their access to

public housing options. Applicants may select one to three preferred public housing developments and will not be penalized for rejecting available units in developments they did not select. The site-based waiting lists are also intended to hold local property management accountable for making our properties a quality housing option attractive to low income families who have a choice of options.

At present, HANH has implemented site-based waiting lists for each of its elderly/disabled developments. During FY 2003, HANH is implementing site-based waiting lists for its family developments.

- ***Elderly-Only Public Housing Units.*** HANH has received HUD approval for elderly designation of four public housing developments which currently comprise 173 units, approximately 16% of HANH's elderly/disabled housing stock. HANH's purpose for seeking elderly designation is to provide public housing opportunities suited to the specific needs of elderly residents. An analysis of HANH's waiting lists indicated a disproportionately low rate of elderly applicants, despite Census evidence of their substantial need for affordable housing. HANH conducted a study of the marketability of its elderly/disabled developments. This market study indicated many barriers that make HANH public housing units an unviable option for elderly households, including the small size of HANH's efficiency units, which constitute the bulk of HANH's elderly/disabled housing stock. Despite the small size of HANH's elderly/disabled units, the market study revealed a demand for elderly-only public housing. HANH will implement elderly-only designation in four developments because HANH has sufficient housing stock to accommodate this preference without disadvantaging other, non-elderly households.

HUD's approval of HANH's elderly designation plan is conditioned upon HANH's receipt of a special allocation of grant-funded Section 8 vouchers for non-elderly disabled persons potentially disadvantaged by the elderly designation.

In addition to HANH's plans for elderly designation of four developments, HANH is also preparing to demolish its former Winter Gardens development, a family development of 34 units, and rebuild a Section 202 elderly development, Victory Gardens, with 42 units.

- ***Increasing the Number of 1-Bedroom Elderly/Disabled Units.*** HANH's total housing stock includes 1,101 elderly/disabled units, about two-thirds of which are efficiency units that, built under design standards of the 1950s and 1960s, are uncomfortably small for most occupants. Limited demand for HANH's efficiencies resulted in high vacancy rates in elderly/disabled developments. HANH conducted a study of the marketability of its elderly/disabled developments. As a result of this market study, HANH's long-term asset management strategies for its elderly/disabled developments involve the conversion of efficiency units through breakthroughs (combining two back-to-back efficiencies into a single larger, one-bedroom unit). This will result in a smaller number of total elderly/disabled units but is critical to providing viable public housing options for elderly and disabled low income households: crowded units are difficult to navigate for persons with mobility limitations; persons with oxygen tanks require at least two separate rooms for safe storage; etc.

At present, HANH is undertaking a major renovation of the four developments intended for elderly designation. The renovations involve breakthroughs to convert existing efficiencies into larger, one-bedroom units.

- ***Increasing the Supply of Accessible Public Housing Units.*** As noted above, HANH's current housing stock includes 79 total accessible units. Under federal regulations, HANH is required to invest in the development of accessible units whenever HANH engages in major modernization projects. Currently scheduled renovations will result in at least 105 new accessible units. HANH's projected development of accessible units is governed by a transition plan, which is currently being revised by HANH's new Department of Design and Construction Management in order to accommodate the Department's and the agency's long-term asset management strategies and heightened priorities for accommodating the special needs of our residents.

HANH's agency reorganization has resulted in the development of a new, more effective Department of Design and Construction Management whose policy is to incorporate accessibility features in every renovated unit as much as is feasible. For example, in HANH's renovations of

four elderly developments, nearly every resulting unit will be accessible. HANH's proposed HOPE VI redevelopment of Quinnipiac Terrace includes plans for more than 10% accessible units, as well as incorporating accessibility features (such as wider doorways) into every unit to promote visitability.

- ***Assisted Living.*** The City of New Haven's Consolidated Plan indicates a substantial need for the development of additional assisted living facilities, particularly affordable assisted living facilities. HANH plans during the next two to five years to convert one of its developments into an affordable assisted living facility.
- ***Supportive Housing.*** HANH has increasingly recognized the substantial need for supportive housing services to help many of our residents maintain lease compliance, build self-sufficiency and maintain independent living, and function successfully within their communities. In partnership with ALSO/Cornerstone, HANH has developed an on-site supportive housing program in its Matthew Ruoppolo Manor development, an elderly/disabled building of 116 units. The Ruoppolo Supportive Housing Program has operated since 2001 and, with 23 funded service slots, has been enormously effective in engaging many of HANH's most troubled residents. HANH is seeking resources to expand the Ruoppolo Supportive Housing Program and to develop similar on-site programming in its other elderly/disabled developments.

In addition, HANH is developing plans for converting its William T. Rowe development, an elderly/disabled building of 176 total units, into a full-service, round-the-clock supportive housing program. Adjacent to one of New Haven's major medical centers, William T. Rowe is advantageously sited for both supportive housing and for commercial development. Current proposals include major redevelopment to provide market-rate commercial office space on lower floors, the proceeds of which will fund services for supportive housing units on the upper floors.

- ***Continuum for Success.*** In 2001, HANH organized the Continuum for Success, a group of HANH staff, state and city officials, service providers, and advocates, for the purpose of finding creative ways of sharing resources to better serve persons with disabilities. The Continuum for Success has proven to be a particularly effective partnership with monthly meetings for over a

year and a half. During that time, the Continuum for Success has produced concrete results: (1) the development of the Ruoppolo Supportive Housing Program, on-site supportive housing services in HANH's Matthew Ruoppolo Manor elderly/disabled development (discussed above, in "Supportive Housing"), and (2) HANH's Project-Based Voucher project to develop, in collaboration with service providers, additional supportive housing units.

- ***Redevelopment of Obsolete Family Public Housing Developments into Housing of Choice.*** One major barrier to housing choice in New Haven is the age and deterioration of many of HANH's large family developments, designed decades ago, now obsolete and inappropriate to the needs of contemporary families. As one of the oldest PHAs in the nation, HANH has one of the oldest housing stocks, with nearly 1,200 units, 40% of its present housing stock, built more than fifty years ago. The age and deterioration of HANH's units is particularly pronounced in its family developments, with 64% of its family units constructed before 1950.

Many HANH family developments, even newer developments, have substantial design and systems deficiencies--heating problems, plumbing problems, erosion, ineffective common spaces, lack of defensible space and site control, superblock layouts that isolate the development from the surrounding community, etc.

HANH's long-term asset management strategies include the full-scale redevelopment of several large family developments into vibrant communities that offer quality affordable housing for low-income families, that reduce the segregation and isolation of low income families through income mixing, and that better accommodate the housing needs of contemporary families.

#### ***Quinnipiac Terrace/Riverview Redevelopment***

HANH is planning demolition and redevelopment of its Quinnipiac Terrace and Riverview family developments (which are located just a few blocks apart). Quinnipiac Terrace is a large family development of 244 total units. Riverview, a small family development of 12 units, is now totally vacant in anticipation of redevelopment. The proposed HOPE VI mixed-finance development will result in a mixed income community that offers choice affordable housing to low income families, as well as market rate units, senior housing, and homeownership

opportunities. Redevelopment plans also include the development of public housing units in a new, off-site development in an unimpacted neighborhood (a neighborhood with less than 51% minority concentration) of New Haven. The proposed redevelopment plans are based on an extensive process of consultation with current Quinnipiac Terrace residents, elected officials, and members of the surrounding community, as well as market studies of community needs.

A HOPE VI grant application to support this redevelopment project was submitted to HUD in December 2002.

***West Rock***

The West Rock neighborhood of New Haven is an isolated thumb of land at the edge of the City limits, intruding into the surrounding suburban towns. Once the site of the area’s poor farm, West Rock now is home to five public housing developments, one convenience store, and two public schools whose entire student body is children who live in public housing. The five public housing developments include 641 total units in three large family developments and two elderly/disabled developments, as follows:

***West Rock Public Housing Developments***

<b>Development</b>	<b>Year Built</b>	<b>Development Type</b>	<b>Number of Units</b>
Brookside	1951	Family	295
Rockview	1951	Family	195
Westville Manor	1986	Family	151
Ribicoff Cottages	1966	Elderly/Disabled	40
Ribicoff Extension	1970	Elderly/Disabled	60
<b>Total Units</b>			<b>641</b>
Total Family Units			541
Total Elderly/Disabled Units			100

The West Rock neighborhood, composed entirely of public housing units, is isolated from the central city by state park land, large industrial land uses and other non-residential land uses, including the large Southern Connecticut State University campus. West Rock is isolated also from the surrounding suburban towns by a 6 foot fence that surrounds the neighborhood’s borders.

The West Rock site is gorgeous, probably the most beautiful, non-urban site within New Haven, surrounded by state park land and with a view of the majestic West Rock. But its housing is deteriorated and obsolete. Brookside and Rockview were built in the 1940s and have numerous structural and systems deficiencies. The third family development, Westville Manor, is one of HANH's newest family developments, but has serious erosion problems. The two Ribicoff elderly/disabled developments are more satisfactory but have serious water problems.

Over the past five years, HANH and West Rock residents have undergone two HOPE VI planning processes, with each HOPE VI grant application denied by HUD. Now, HANH is considering other mixed-finance opportunities for the redevelopment of West Rock. At present, HANH's proposed plans include demolishing and rebuilding on the Brookside and Rockview sites, as well as major site and building renovations of the Westville Manor and Ribicoff developments.

- ***Affordable Homeownership Opportunities.*** The City of New Haven has an inordinately low homeownership rate—less than 30% --compared to the 68% homeownership rate nation-wide. The City of New Haven has made a high priority of increasing homeownership in the City, particularly affordable homeownership opportunities accessible to City residents. HANH is committed to developing homeownership opportunities, particularly affordable homeownership opportunities accessible to HANH program participants and other low-income families, as part of HANH's redevelopment plans.

HANH's HOPE VI redevelopment of its Elm Haven (now Monterey Place) public housing development includes the construction of affordable homeownership units. HANH's proposed HOPE VI redevelopment of the Quinnipiac Terrace/Riverview sites also will include homeownership units, including ten public housing replacement homeownership units with subsidies to enable their purchase by low-income public housing families. Likewise, HANH's planned redevelopment of West Rock will include affordable homeownership units.

HANH has resources, services, and housing assistance to help its program participants access

homeownership opportunities. HANH's homeownership programming is discussed below, in "Homeownership Supportive Services for Public Housing Residents," and, for Section 8 families, in the later discussion of opportunities for Tenant-Based Assistance, the Section 8 Homeownership Program.

- ***Homeownership Supportive Services for Public Housing Residents.*** In November 2002, HANH learned that it was awarded a HUD ROSS grant for Homeownership Supportive Services for public housing residents. This grant will fund the majority of a \$500,000 program to provide an intensive program of homeownership training, counseling, and case management to fifty public housing families over the next three years. The program has specific eligibility requirements, including work and minimum income requirements, and is limited to families who actively participate in HANH's Family Self-Sufficiency Program.

HANH's program for homeownership training and counseling builds upon numerous city-wide programs, services, and resources designed to increase homeownership opportunities for city residents.

- ***Resources for Improving Family Self-Sufficiency.*** One of the major barriers to housing choice and access to opportunities is the limited self-sufficiency of New Haven's low-income families. HANH is committed to providing services (or facilitating access to services) that help our families achieve greater self-sufficiency.

***Family Self-Sufficiency Program.*** Since October 2001, HANH has operated a Family Self-Sufficiency (FSS) Program that provides intensive case management, financial incentives, and access to services necessary to help families achieve their self-sufficiency goals, including employment, increased income, job advancement and educational advancement, youth achievement, improved healthcare, independent living, homeownership, etc. Currently, the FSS program has 100 total service slots, 50 for public housing families, and 50 for Section 8 families. Within one year of its implementation, 25% of participant families have increased their income.

***Family Support Centers.*** In three of HANH's largest family developments, HANH has invested in Family Support Centers, which provide on-site case management, services, referrals to other off-site services, and community activities, all of which are devoted to enhancing families' healthy development and self-sufficiency. At present, HANH's Family Support Centers are located in the Quinnipiac Terrace, Eastview Terrace, and Farnam Courts developments. HANH hopes to expand its Family Support Center model to McConaughy Terrace.

### **HANH Section 8 Assistance**

The Housing Authority of New Haven and the State of Connecticut manage Section 8 assistance, and other state tenant-based housing assistance payments, within the City of New Haven. The Housing Authority program is much larger, with 3,630 total vouchers.

The vast majority of HANH's Section 8 funding is committed to tenant-based assistance. In addition, a smaller portion has been committed to project-based Section 8 assistance, including SROs and project-based supportive housing development. HANH Section 8 programs and initiatives to increase housing choice include the following:

- ***Housing Search Assistance.*** HANH's partner, HOME, Inc., provides housing search assistance, but HANH needs additional housing search assistance resources to serve all Section 8 participants who would benefit. HANH considers housing search assistance to be a critical tool for helping participant families to lease-up and increasing HANH's Section 8 lease-up and budget-utilization rates. A significant proportion of HANH's Section 8 participants have mental health problems and other disabilities that limit their ability to effectively use their Section 8 assistance. HANH has sought HUD grant funding for housing search assistance, but, most recently in 2001, HANH's grant application was denied because of a technical threshold requirement. The lack of funding for housing search assistance is particularly critical because virtually any Section 8 grant funding--including replacement and relocation Section 8 funding, and funding in support of elderly designation plans--requires a 97% Section 8 lease-up/budget utilization rate.

- ***Project-Based Section 8 SRO Units.*** For many families, single-room occupancy (SRO) units are not a viable long-term housing option. However, historically, SROs have proven to be a respite against homelessness, and, in New Haven, there is substantial demand for SRO units. HANH administers 80 project-based vouchers for SRO units.
- ***Project-Based Supportive Housing Programs.*** In recognition of the community's need for affordable supportive housing, HANH has committed 100 of its Section 8 vouchers to project-based voucher supportive housing programs. In 2002, HANH issued an RFP inviting supportive housing providers to apply for HANH resources to develop Section 8 project-based supportive housing programs. As a result of this RFP, HANH has committed to providing Section 8 resources for four project-based voucher supportive housing programs, totaling 42 units. HANH plans to issue a new RFP for the development of additional project-based supportive housing programs.

In addition, HANH has committed 121 vouchers to a state-wide effort to develop additional project-based supportive housing units. This collaborative includes other Connecticut public housing authorities, the Connecticut Housing Coalition, the Technical Assistance Collaborative, and the Connecticut Housing Finance Authority.

- ***Section 8 Homeownership Program.*** HANH has implemented a Section 8 Homeownership Program (SEHOP) which permits qualifying Section 8 participants to apply their housing assistance to monthly mortgage payments. As of November 2002, HANH has two families ready to purchase homes and receive Section 8 homeownership assistance.
- ***Landlord Workshops.*** HANH's Service Center is conducting quarterly workshops for Section 8 landlords with topics such as available resources to support accessibility renovations in private rental units. The landlord workshops have two primary purposes: (1) to provide information and resources in support of housing goals (such as the increased supply of accessible units), and (2) to build effective communications and working relationships in order to increase the supply of Section 8 landlords.

## Homeless Facilities

The City of New Haven is home to the majority of the region's resources for the homeless. It is still a common occurrence for suburban communities to bring their homeless to the City. One of the shelters located in New Haven contracts with these towns for the provision of emergency housing. However, once in New Haven, it is unlikely that individuals or families will return to their town of origin unless special resources are made available. All social, medical, and psychiatric services are located within the City. Public transportation is also inadequate in suburban locations making access to services difficult. Until there is legislation and resources which limit a urban center's obligations, cities such as New Haven bear a disproportionate share of the region's obligation to homeless and at-risk individuals and families. Additionally, 60.5% of the homeless population surveyed reported having a severe disability and 64% of individuals that have been or are homeless stated that homeless services were somewhat inaccessible or not at all accessible for persons with physical disabilities<sup>10</sup>.

Emergency Shelter Facilities: There are ten (10) emergency shelter facilities in New Haven. Three (3) serve individual adults, three (3) are for families, one (1) is for youth, one (1) is for single women and women with children, one (1) is for victims of domestic violence and one (1) is used solely for seasonal overflow.

**Emergency Shelter Facilities in New Haven**

<b>Individuals</b>		<b>Population Served</b>
Columbus House	52 Beds*	52 single men and women
Immanuel Baptist	75 Beds	75 men
Women In Crisis-New Haven Recovery	18 Beds	18 women
Youth Continuum -Douglas House	16 Beds	16 youths (13 to 18 yrs)
<b>Total</b>	<b>161 Beds</b>	
Winter Overflow	<b>75 Beds</b>	75 men
<b>Families</b>		
Life Haven	20 Units	20 families
Women in Crisis- New Haven Home Recovery	2 Units	2 families
Christian Community Action	17 Units	17 families
Domestic Violence Services	15 Beds	Flexible based upon family size
CareWays – New Haven Home Recovery	10 Units	10 families
<b>Total</b>	<b>64 Units</b>	

\* Columbus House is increasing its bed capacity from 52 to 101

<sup>10</sup> New Haven Disability Study, July 1999

The Youth Continuum assists about 1,500 homeless and at-risk youth a year from throughout Connecticut. Its 15 bed shelter provides temporary housing and its drop-in center provides a place for homeless teens to receive supportive services, counseling and the information necessary to stabilize their lives. Several needs relative to homeless and at-risk youth remain. According to the Youth Continuum there is a need for a residence for homeless girls with babies and a shelter or group home for teenagers to avoid placing them in an adult shelter.

*Drop-In Centers:* In addition to emergency shelters, there are the drop-in centers run by Fellowship Place, AIDS Interfaith Network, New Haven Homeless Resource Center and Youth Continuum.

*Special Social Services:* Social services for the homeless are often available where medical attention or emergency shelter is provided. Neighborhood based medical clinics, the regional mental health facility and the hospitals, all located in New Haven, have social workers and psychologists available to assist those who present themselves for care. The Veterans Hospital, located in West Haven, has a special program for homeless veterans which provides acute care, follow up social services, mental health and medical care as well as housing assistance.

*Outreach and Assessment:* The City of New Haven was home to a five-year research demonstration program called ACCESS (Access to Community Care and Effective Services and Supports). Administered by the Connecticut Mental Health Center, ACCESS provided services through an inter-agency homeless outreach team to engage homeless mentally ill individuals at local soup kitchens, shelters, under bridges and on the streets to offer them a range of housing assistance and supportive services. Due to the success of the demonstration program funds were sought to continue the services. State of Connecticut funds through the Department of Mental Health and Addiction Services have been made available to support a multi-agency “outreach and engagement” team. Again implemented through the Connecticut Mental Health Center the new program has a broader target population that includes persons with substance abuse problems in addition to persons with mental illness.

Transitional Facilities: There are several providers of Transitional Housing for the homeless in New Haven. They are as follows:

**Transitional Facilities in New Haven**

Provider Name	Facility Name	Individuals	Persons in Families with Children
ALSO-Cornerstones, Inc.	Pendleton House	20	
Christian Community Action	Stepping Stone		18
Columbus House	Davenport House	15	
Columbus House	New Hope	6	
Columbus House	Sojourner's Place	16	
Continuum of Care	Frank Street	12	
Hill Health Center	Grant Street Partnership	31	
Hospital of St. Raphael (Consortium)	Homeless Facilities Transitional Collaborative		10
Liberty Services (formerly CARP)	Transitional Living Program	16	
New Haven Home Recovery			12
The Connection	Region II Recovery House	20	
Salvation Army	Adult Rehab Center	40	
Veteran's Administration		31 (2 houses)	
YMCA		60	
Youth Continuum	Umoja House	14 beds	
<b>Totals</b>		<b>241</b>	<b>40</b>

Source: New Haven Continuum: 2002

Barriers to Housing the Homeless: In 1999, a Homeless Needs Study was undertaken by the City. As part of the 1999 Homeless Needs Study, several barriers to housing the homeless were identified. These barriers and suggested recommendations follow:

Income Support

- Lack of sufficient and/or consistent income is a significant barrier to homeless individuals' efforts to access and maintain permanent housing. Welfare reform has dramatically decreased the number of people eligible for public benefits, making other sources of income such as employment and rental subsidies more important.
- In many cases income support during temporary transitions, such as moving from one apartment to another, or during job training, is lacking.
- Policies regarding the transition from public benefits to wage income do not provide sufficient economic or medical insurance incentives to encourage progress towards economic independence. This in turn prevents people from being able to obtain affordable housing.

Recommendations

- Provide income support to individuals in job training or substance abuse treatment programs so that they can access or maintain housing.

- Modify current public benefit policies to increase the incentives for moving to gainful employment.
- Provide services that assist homeless people in accessing employment that offers a living wage with which people can afford decent housing.

#### Systematic Barriers

- Individuals with histories of involvement in the criminal justice system are systematically barred from access to parts of the housing and supports continuum (e.g. HUD funded housing).
- Additionally, there is limited and sometimes no coordination across systems and people commonly fall “through the cracks” between housing, treatment, criminal justice and other government systems.
- Many individuals have behavioral health problems, including mental health and substance abuse problems, that frequently impede their capacity to access and maintain permanent housing.

#### Recommendations

- Coordination mechanisms among various systems including criminal justice, substance abuse treatment, homeless service providers and mental health organizations must be formalized to reduce the number of people who become homeless in the transitions from one system to another.
- Revise policies that systematically prevent individuals with criminal justice involvement from accessing housing.
- Develop housing resources, including additional transitional and supportive housing units, that address the service needs of persons who have been involved in the criminal justice system and help them regain eligibility for subsidized housing.
- Develop permanent supportive housing resources that provide long-term, on-site services to help persons with behavioral health problems maintain permanent housing, live independently, and function effectively in the community.

#### Shelter-related Barriers

- Regulations regarding the design and operation of shelters has prevented shelters from providing the optimal environment and supports needed by people to successfully access housing and employment.
- Most shelters are unable to have flexibility in their hours making them unattractive or inconvenient for people with non-standard jobs or other commitments.
- Current funding for services does not allow enough flexibility in the length and nature of services to help individuals progress from the shelter system to housing.
- Many shelters do not offer a wide range of services on-site and effective access to off-site services is limited.
- Due to low salaries for shelter staff, it is difficult to recruit and retain workers with the level of skills required to effectively assess and intervene around the needs of homeless people. Available funds for training shelter staff are limited.

## Recommendations

- Modify the policies regarding design and operation of shelters such as hours of operation and the availability of supportive services.
- Improve the access of shelter users to services both by providing more services at the shelters and by adding/ improving referral services to community-based resources.
- Institute case management services that stay with an individual after she/he leaves the shelter for transitional or permanent housing. Support services are needed that can fluctuate to meet the needs of the individual (e.g. tapered supports).
- Due to the complicated social problems experienced by people who are homeless, shelter staffing patterns should include positions that require skills and experience in addressing these problems. Additionally, provide more training for shelter staff regarding assessment and service delivery.
- In many specific cases, limited services, such as on-going money management, are all that is required to access or maintain housing.

## **Alternative Living Environments**

Many alternative living environments exist in New Haven. Because of the availability of medical, psychiatric and social services within the City, these facilities are usually located in New Haven. There is a shelter for victims of domestic violence within the City. The Connecticut AIDS Residence Program (CARP) currently provides permanent housing for persons living with AIDS. There are group houses and supported living units managed by the Department of Mental Retardation and the Department of Mental Health. Crossroads provides temporary housing for those released from substance abuse programs.

*Elderly:* The Department of Elderly Services has identified the following specific needs of the elderly: 1) Affordable or subsidized homecare for elders who are not eligible for Medicare or Medicaid, but who clearly cannot afford to pay for themselves; 2) Better transportation including personal assistance (help from the house to the office and/or persons to wait with clients during office visits), shorter wait times for transportation, and transportation for purposes other than medical; 3) Additional senior housing, including assisted living, with shorter wait lists; 4) Better publicity of the services and resources available to seniors; 5) More outreach workers to serve frail and homebound elderly; 6) Financial assistance for adult day care centers; 7) Prescription assistance for those not meeting State or Federal assistance guidelines and 8) Increased medical and dental services.

In May 1997, the State of Connecticut Department of Social Services conducted a survey of elderly needs as part of its State Plan on Aging. The ten (10) highest ranked needs of the elderly ranked in order of priority are health care; home and community-based services; income support; nutrition; transportation; housing; information and referral; protection and advocacy; consumer protection and socio-recreational opportunities. In the most recent State Plan on Aging prepared for the October 2002 to September 2005 planning period the highest ranked needs of the elderly based upon a needs assessment were the high cost of prescription drugs; concern over the future of Social Security, Medicare or pension income; the high cost of medical care; not having enough money to live on; the need for help at home to stay out of nursing homes; poor health; help in understanding Medicare and health insurance options; transportation to stores, doctors and places of recreation; need for housing that includes assisted living services; and inadequate, inappropriate or very expensive housing.

1990 Census figures revealed that 21.7% of all households in New Haven were headed by persons over 65 years old. These elderly comprised 29.3% of all owners while only 18.3% of the renters. There were approximately 4,820 very low income elderly households and 1,518 low income elderly households in rental units according to 1990 Census special release figures provided by HUD. According to 2000 Census figures 18.2 % of all households in New Haven were headed by persons over 65 years of age. These elderly comprised 26.9% of all owner households and 14.5% of all renter households. HUD has yet to receive and release low- and moderate-income statistics based upon the 2000 Census.

Although there is a large number of subsidized rental units for the elderly, it appears that existing resources inadequately address the needs of elderly households. According to 1990 CHAS data, 59% of elderly renters have housing costs that exceed 30% of total income, and 28% report housing cost burdens exceeding 50% of total income. At the same time, public housing units and Section 202 housing in New Haven are now experiencing vacancies and declining applications from elderly families. As the current population ages it is apparent that there will be a need for affordable housing in the future. Concerns have also been raised about suitable housing and services for grandparents who are the legal guardians of very young children.

It is also important to note that healthy elderly tend to remain in their homes longer. Pension and social security income permits householders 65 and older to retain ownership status. Renters also do not move until their health deteriorates substantially. Therefore, some neighborhoods and larger rental complexes are being transformed into unofficial elderly complexes. This phenomenon is pressuring communities to provide on-site social services for the elderly. It is likely that this trend will continue.

Suburban towns are beginning to respond to the need for elderly housing so that the pressure to create affordable elderly rental units in New Haven has changed. Some of these newer developments combine independent living with medical and social service facilities on the same site. However, there is a need for congregate elderly housing. As the number of senior citizens increases, there are fewer units available which provide more intense services for the frail elderly.

In addition, there are many institutional settings for long-term geriatric care. The 1990 Census indicates that 1,276 elderly reside in such facilities as the Jewish Home for the Aged, Regis Health Center, Winthrop Continuing Care, Cove Manor, and the Mary Wade Home.

The Department of Elderly Services and the Community Action Agency provide additional services to the elderly. There are 13 Senior Centers funded by the City of New Haven where nearly 2,000 hot lunches are served on a daily basis and where seniors gather for social and recreational programs. The City also funds elderly outreach workers to meet the needs of the frail and homebound elderly. CAANH provides medical transportation, fuel assistance, housekeeping assistance and elderly nutrition programs ('Meals on Wheels') to low-income elderly.

*Persons with Mobility Impairments:* New Haven's Department of Services for Persons with Disabilities conducted a survey of the disability population in New Haven in July of 1999. Resulting data found that persons with disabilities make up 26% of the New Haven's population, with 60.5% of the homeless population having one or more disabilities. Of the disability population 45.4% have a physical disability with 50.6% of the respondents stating that they had a somewhat or very severe

disability<sup>11</sup>.

Lack of housing continues to be a significant problem for persons with disabilities. A related problem is the high unemployment rate of persons with disabilities and very low income levels. People with disabilities in New Haven have an 68% unemployment rate with 37.5% of the unemployed citing lack of convenient housing as a reason for not working. 32% of persons with disabilities make less than \$15,000.00 per year and 32.1% of respondents said their current housing was somewhat difficult to afford or not at all affordable. When respondents were asked what services were needed in New Haven the second highest response was access to affordable housing. Additionally, 78.1% of the respondents believe that there is not enough accessible housing.<sup>12</sup>

Clearly, New Haven has a need for additional accessible or adaptable rental units. Federal accessibility laws and the State Building Code will, by their implementation, create more units. In addition, plans for redevelopment and major renovations of New Haven public housing developments will result in increased supply of subsidized accessible units. However, there are other policy changes which need revision. Additionally, public and non-profit agencies need to be made aware of the differing needs of the elderly disabled and younger individuals with disabilities. City agencies, particularly the Department of Services for Persons with Disabilities, must encourage not-for-profit developers and human service providers to develop and operate the housing needed.

In addition, public and non-profit agencies need to be made aware of the differing needs of the elderly disabled and young disabled singles. City agencies, particularly the Department of Services for Persons with Disabilities, are working to encourage not-for-profit developers and human service providers to develop and operate the type of housing needed by persons with mobility impairments. To achieve this goal the Department of Services for Persons with Disabilities needs to be able to work more closely with LCI in order to encourage a rapport between these not-for-profits and City departments so that they may be able to acquire parcels of land and/or access to buildings suitable for or undergoing renovation. Although there are some not-for-profits that have worked with LCI more

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<sup>11</sup> New Haven Disability Study, July 1999

<sup>12</sup> New Haven Disability Study, July 199

affiliations would occur if there was an active housing task force within the City.

Developmentally Disabled: In the mid-1990's, the State of Connecticut Department of Mental Retardation figures indicated there were 160 beds for developmentally disabled residents located at scattered sites in the City of New Haven. Most of these beds are located in group homes or supervised apartments housing from 3 to 8 individuals. An additional 250 individuals who were currently living at home in the region were requesting housing assistance. Some of those requests will be accommodated in New Haven.

There are several private agencies in the Greater New Haven area providing residential and vocational support to persons with mental retardation. Although these agencies provide a variety of living arrangements and supportive services there is a continuing need to provide additional affordable housing and services.

**Private Provider Agencies in Greater New Haven  
Serving the Needs of Persons with Mental Retardation**

**Residential**

Opportunity House  
HART  
Institute of Professional Practice  
SARAH Seneca Residential Services  
SARAH Tuxis, Inc  
Continuum of Care, Inc.  
Chapel Haven  
New Samaritan, Inc.  
Vantage, Inc.

Hamden  
Hamden  
Woodbridge  
Branford  
Guilford  
New Haven  
New Haven  
East Haven  
North Haven

**Vocational**

ACES/ACCESS  
ARC of Greater New Haven  
Benhaven Adult Vocational Services  
Easter Seals Goodwill Industries  
Institute of Professional Practice  
SARAH, Inc.  
So. Central CT Agency on Aging

North Haven  
Hamden  
East Haven  
New Haven  
Woodbridge  
Guilford  
West Haven

Serious Mental Illness: The Mental Health Needs Assessment conducted by the Consultation Center as part of the 2000-2004 Consolidated Plan update process estimated that there are approximately 21,597 (24% of the general adult population) who have a diagnosable mental disorder of low to serious severity. Based on this calculation, 16,640 adults (18.5% of the general adult population) have a diagnosable mental disorder of low to moderate severity and approximately 4,960 or 5.4% of the general adult population have a serious mental illness. Of the 4,960 adults in New Haven who have a serious mental illness, about 4,500 are utilizing services provided through the Department of

Mental Health and Addiction Services (DMHAS) funded mental health system including Psychiatric Treatment; Residential, Social and Vocational Rehabilitation; Case Management and Homeless Shelter Services. It appears that most persons with serious mental illness in New Haven receive some type of mental health service during a 12 month period. However, this factor does not speak to the quality of life of the individuals who are utilizing services, and that they clearly would benefit from additional housing and support services if resources were available.

The Connecticut Mental Health Center has worked to expand outreach to the homeless mentally ill. It is difficult to account for and help all seriously mentally ill as they do not present themselves at emergency shelters. Active outreach is required on the streets, in shelters, under bridges, at Soup Kitchens and through service providers such as Fellowship Place in order to locate and then help this group. Currently, the Mental Health Network Supportive Housing Program provides housing for 48 single adults with serious mental illness and co-occurring substance abuse. The capacity of the Mental Health Network Supportive Housing Program was increased from 32 to 48 when the Columbus Women's Transitional component (capacity 16) was brought on-line. Full scale social, vocational, educational and basic needs supportive services are provided to over 500 clients of the mental health system at Fellowship Place.

The Mental Health Needs Assessment provided an assessment of needs for Persons with Serious Mental Illness (SMI) and Persons with Psychiatric Disorders of Low or Moderate Severity. These needs are summarized below but can be found in more detail in the Mental Health Needs Assessment Executive Summary attached as Appendix C of the 2000-2004 Consolidated Plan.

- The co-occurrence of medical problems is an issue for over one half of the clients served through the mental health system receiving homeless shelter, vocational and residential services. Local research has shown that this may make it more difficult for this group to find and maintain stable housing. This does not mean that members of this group are unable to have meaningful productive lives if provided sufficient supports and opportunities to do so.

- There is a lack of community-based transitional and permanent housing with a “dry” environment necessary to address the needs of persons who have SMI with co-occurring substance abuse disorders.
- Agency leaders across all service types report that a large number of their clients are a victim of family violence, either currently, in the past or both. The scarcity of safe, affordable housing and limited housing assistance force many women and their children to move into temporary or unsafe situations that invariably lead back to homelessness.
- Adults with SMI often have difficulty adjusting to the community. Therefore, while housing subsidies are crucial to allow this group to obtain housing, additional case management supports are also needed to support community integration.
- A significant percent of persons with SMI receive some type of governmental income assistance and/or rental subsidies, but the level of funds are often insufficient to meet housing and other needs.
- A significant number of clients within the Managed Service System have difficulty obtaining and maintaining safe, affordable and decent housing.
- Affordability of housing is a significant problem for many clients.
- The three most needed housing and residential options identified by agency leaders were supervised cooperative apartments, supervised group living and shared housing with off-site case management support. Agency leaders also report a need for more substance abuse and dual diagnosis services and money management programs.

- Agency leader respondents stated that poor client housing skills, inability to manage funds, a lack of formal education, and an unhealthy social network are all client-related barriers that can lead to unstable housing and homelessness.

The National Low Income Housing Coalition (NLIHC) published a report titled “Out of Reach” in September 1999 that documented housing affordability issues. Using the published Fair Market Rents and the HUD guideline that households should not spend more than 30% of their income for housing it is clear that a significant portion of individuals and families can not afford the rental housing available in New Haven. This results in many households occupying substandard housing, in unsatisfactory living arrangements or homeless. Although housing affordability impacts all segments of the community it is likely that the majority of those with serious psychiatric and substance abuse disorders have even fewer resources with which to access housing.

The New Haven Shelter Plus Care Program, administered locally by the Consultation Center of the Connecticut Mental Health Center, provides “permanent” assisted housing (5 year rental subsidies for Tenant and Sponsor-based housing assistance and 10 years for Project-based Rental Assistance) for 147 individuals and families who are street or shelter homeless and have either serious mental illness, chronic substance abuse, dual diagnosis of serious mental illness and substance abuse and/or HIV/AIDS-related disorders.

The Housing Authority of New Haven (HANH) is committed to developing affordable housing resources with services to support persons with mental health problems. HANH has set aside 100 Section 8 vouchers to provide project-based Section 8 subsidies for supportive housing programs. As of December 2002, 4 projects with 42 total units are preparing to begin operations. In addition, HANH has helped to spearhead a state-wide coalition of housing authorities to develop new supportive housing resources throughout the state, and HANH has committed 120 vouchers to this effort.

In addition to activities to develop new housing resources for persons with mental health problems,

HANH is seeking to bring services and resources to its existing housing units, with the dual goal of (1) helping currently-housed residents receive the services they need to maintain their housing, avoid eviction, and function independently and effectively within their communities, and (2) helping HANH to better meet the housing needs of persons which are homeless or at risk of homelessness and whose ability to maintain housing is jeopardized by mental illness and related behavioral health problems. In collaboration with ALSO-Cornerstone, HANH has developed the Ruoppolo Supportive Housing Program in its Ruoppolo Manor public housing development. The Ruoppolo Supportive Housing Program has 23 service slots to support Ruoppolo residents with behavioral health problems or mental health problems often combine with substance abuse problems. HANH seeks to expand the Ruoppolo Supportive Housing Program and to replicate it in its other public housing developments throughout the City.

Over the past five years, HANH management has improved significantly, and improved management is bringing to light the enormous scale of service needs of many public housing residents. One growing area of concern is the incidence of depression among public housing residents. HANH does not have any data on the incidence of depression in its development, but anecdotal evidence--from annual Housing Quality Standards inspections, from housekeeping inspections, from interventions initiated as a result of legal proceedings—suggests an enormous incidence of chronic depression that is untreated or inadequately-treated and that, over time, severely impacts families' ability to effectively maintain housing.

*Housing For Persons with HIV/AIDS:* The programs belonging to the Connecticut AIDS Residence Coalition offer supportive housing to persons with AIDS. Housing ranges from scattered site housing in independent apartments to group residences accommodating between 6 to 28 individuals. As of July 1999 there are more than 390 housing slots for persons living with the AIDS disease. More than 250 slots are in scattered site configurations and 148 slots are in group residences.

The Housing Opportunities for Persons with AIDS (HOPWA) program administered by the New Haven Health Department provides for rental assistance, community residences, transitional living,

supported independent living programs, emergency shelter and a host of support services. Programs funded by the New Haven HOPWA program include:

- Columbus House, Inc. - The Columbus House has been funded for a day program for 5 - 10 homeless persons with AIDS who must utilize the shelter. This is an attempt to keep the homeless AIDS clients from being pushed into the street during the day when the shelter is closed. Meals, supervision, case management and substance abuse counseling is provided.
- Liberty Services (formerly Connecticut AIDS Residence Program (CARP), Inc.) - For more than ten years Liberty Services (CARP) has provided permanent and transitional housing with supportive services to homeless and near homeless persons living with HIV & AIDS. CARP maintains 17 Transitional Housing units and 7 permanent supported housing units and 30 scattered site independent living units. CARP also provides rental assistance subsidies, case management and outreach and referral.
- Connecticut Hospice, Inc. (specifically the Hospice Cottage) - The Connecticut Hospice Cottage is a residential home for up to five persons with AIDS who have short-term prognosis of six months or less and who are homeless. The Cottage has been in operation since 1987.
- Leeway, Inc. - Leeway is a 30 bed skilled nursing facility that services HIV/AIDS patients exclusively. Leeway opened in October 1985.
- New Haven Home Recovery, Inc. (NHHR) - NHHR began offering services to its clients in 1993. It is an AIDS Scattered Site Housing Program for Families affected with HIV/AIDS. NHHR current subsidizes forty-one (41) units, twenty-seven (27) of which are supported by HOPWA funds.

The New Haven Shelter Plus Care Program funded by the U.S. Department of Housing and Urban Development through the State's Department of Mental Health and Addiction Services (DMHAS) is

administered locally by the Consultation Center of the Connecticut Mental Health Center. The sponsor-based component of the Shelter Plus Care Program provides rental subsidies to households affected by HIV/AIDS through New Haven Home Recovery.

New Haven Home Recovery, Inc. provides subsidized housing and advocacy to HIV positive persons and their families. Funded with Ryan White Title I, CT Department of Social Services, Housing Opportunities for Persons with AIDS (HOPWA) as well as other city, state, federal and private funding, New Haven Home Recovery provides a scattered site supportive housing program, operates a housing assistance resource center and provides substance abuse counseling to HIV positive clients. As part of the Scattered Site Supportive Housing Program, New Haven Home Recovery provides case management and rental subsidies for families in which a parent or caregiver is HIV positive. The program currently subsidizes up to 40 families. As part of its Housing Assistance Resource Center housing advocacy for HIV positive individuals with no dependents is provided. Assistance is also provided to HIV positive individuals who possess State RAP or Section 8 Certificates. Referrals to HIV case managers, substance abuse evaluations, counseling and support groups are provided. Assistance in preparing Shelter Plus Care and other subsidy applications is also provided. The program has the capacity to advocate for 30 individuals at one time. Substance abuse counseling is also provided to HIV positive clients who have substance abuse issues.

### **Conclusion**

As evidenced by the preceding narrative, the City of New Haven provides the majority of the region's affordable and special needs housing in addition to a multitude of support programs and services. Although there is continuing need to provide more decent, safe and affordable housing and special needs housing a regional approach to increasing these housing resources would be optimal. To this end, the City and the South Central Connecticut Regional Councils of Governments are working to develop a regional housing task force to identify housing issues and solutions on a regional basis.

**III. EVALUATION OF THE CITY'S CURRENT  
FAIR HOUSING LEGAL STATUS**

### **III. EVALUATION OF THE CITY'S CURRENT FAIR HOUSING LEGAL STATUS**

The City of New Haven has had a Commission on Equal Opportunities (CEO) since 1964. The CEO has the legal authority to take appropriate action against public and private employers, landlords and contractors within the City for discrimination on the basis of race, color, creed, religion, age, physical disability, sex, sexual orientation, national origin or familial status.

The New Haven Commission on Equal Opportunities is one of the oldest municipal civil rights agencies in the nation. Because it was created by a City Ordinance it is a semi-autonomous administrative and legal organization. It is responsible for enforcing Section 122-1 of the New Haven Code of Ordinances, which prohibits discrimination in employment, housing, public accommodations and credit transaction. The agency processes complaints for citizens who believe they have been discriminated against and makes referrals to appropriate agencies. The CEO also enforces contract compliance and affirmative action.

The CEO, in addition to its regulatory activities, provides educational, informational and referral services to New Haven residents. Copies of printed material and articles utilized/developed by the CEO are included as part of the Analysis to Impediments supporting documentation.

The formal function of the Commission on Equal Opportunities, as set forth in the New Haven Code of Ordinances and its amendments, are as follows:

- A. To promote mutual understanding and respect among and encourage equality of opportunity for all people of New Haven without regard to their race, color, religion, creed, national origin, age, sex, marital status, ancestry, sexual orientation, familial status, and physical disability.
- B. To conduct programs of education, research, investigation, and action for the purpose of carrying out the provisions of the Ordinance.

- C. To work with governmental and private organizations and groups for the purpose of achieving harmonious inter-group relations in the community. To develop and establish positive programs which will help all members of the community enjoy equality in all phases of community life.
- D. To supplement, through official local action, the implementation in New Haven of the state statutes prohibiting discrimination in employment, public accommodations, and housing, and to process complaints of discrimination involving alleged violations of these laws.

The Discrimination Complaint Process utilized by the CEO is as follows:

1. Inquiry: A call/visit to the Commission.
2. Intake: Interview is held at the Commission, formal charge is drafted and signed.
3. A copy of the charge is sent to the Respondent (person or place charged with the allegation of a discrimination practice).
4. Case investigation may involve a fact finding conference held at the Commission with the complainant, respondent and witness (if any); a visit to the workplace or house facility by a Commission staff member, the obtaining of necessary investigative records through the mail, or a combination of the above.
5. The case is analyzed and summarized for the Executive Director's ruling. The investigator will either recommend "No Reasonable Cause" or "Reasonable Cause" based on the evidence obtained.
6. The executive director reviews the entire case and rules either "No Reasonable Cause" - "Insufficient Evidence" - "Case Closed" or "Reasonable Cause" - "Sufficient Evidence for Discrimination". Commission then attempts to conciliate the case.
7. Conciliation: Successful - case closed or Unsuccessful - Public hearing is scheduled.
8. Public Hearing: Formal proceedings; testimony under oath.
  - a. If discrimination is determined at the public hearing, remedies are ordered for the complainant.

- b. If discrimination is not determined at the public hearing, the case is closed.

Complainants are not required to have a lawyer during the investigation of their charge; however, they may be represented by counsel if they wish. Complainants must obtain their own attorney. The Commission strongly urges parties to obtain a lawyer if the case is going to public hearing.

The Commission encourages all parties to consider an amicable settlement of a charge of discrimination.

**A. Fair Housing Complaints, Compliance Reviews or Suits**

The CEO Fair Housing Program was established in 1978. During the past five (5) years, the Commission has received a total of 240 inquiries and 11 formal complaints. Although the Commission’s legally required procedure does not commence until a formal “complaint” affidavit is filed, it provides assistance to complainants from the point of initial inquiry.

	<u>1999</u>	<u>2000</u>	<u>2001</u>	<u>2002</u>
Inquiries	52	51	55	72*
<b>Complaints</b>	<b>0</b>	<b>2</b>	<b>5</b>	<b>4*</b>

\* As of November 31, 2002

Source: City of New Haven Commission on Equal Opportunities

There have not been any incidents of violence or vandalism recorded in regards to Fair Housing in the City of New Haven.

**B. Reasons for Any Trends or Patterns**

The Commission Fair Housing Program was without staff for 10 months until April 2000. During the past two years the Fair Housing Program Assistant has aggressively provided educational packages and conduction outreach meetings, promoting fair housing to the communities which can be contributed to the increase of housing inquiries and complaints.

**IV. IDENTIFICATION OF IMPEDIMENTS TO  
FAIR HOUSING CHOICE**

#### IV. IDENTIFICATION OF IMPEDIMENTS TO FAIR HOUSING CHOICE

##### A. Public Sector

##### 1. Land Development, Zoning and Site Selection

*Land Resources:* The City of New Haven is comprised of 18.9 square miles and is generally considered a fully-developed city. According to the Assessor's Office, 40% of all real property on the City's Grand List is tax exempt. The City Plan Department estimates that less than 2% of all assessed property in the city is vacant residential. The dearth of available land is compounded by a variety of site constraints, including steep slopes, ledge, tidal wetlands and infrastructure. Development of these sites raises a number of environmental sustainability issues, largely related to carrying capacity and appropriate density. When permitted, the higher cost of developing a sensitive site often exceeds that of more typical suburban locations.

In the context of dwindling resources, there is increasing consensus that City priorities for housing development should be aimed at existing stock (including blighted buildings, troubled condominium complexes and suitable adaptive reuse possibilities). In addition, there is continuing efforts to develop contextual infill residential development.

Where appropriate, the demolition of buildings which cannot be made serviceable will occur to allow for new construction projects. The City has realized success with infill development, at appropriate densities, by mixing open space and contextual new construction. This approach is the basis for many of the City's redevelopment efforts.

*Zoning:* The Zoning Ordinance prescribes residential density in New Haven. The ordinance includes site plan review provisions to ensure appropriate placement of units and high quality site development. Zoning in New Haven, even in the most restrictive districts, allows densities higher than surrounding communities and facilitates the development of affordable housing. For example, RS-1 zone allows for approximately 6 units per acre. In general, the higher densities allowed in the

City will decrease land cost per unit and will have a significant effect on delivery costs. Through new site development techniques, such as clustering, construction costs are further reduced. The Zoning Ordinance also makes provisions for Planned Development Districts, which have no maximum residential density, provided certain standards are satisfied. “PDDs” are subject to Aldermanic approval.

Site Selection: The City Plan Department and Empower New Haven recently completed neighborhood plans in three of the Empowerment Zone neighborhoods. In addition, City Plan is completing a new comprehensive plan of land use and development. The new comprehensive plan recommends support for new and redevelopment of government-assisted housing in a manner that enhances the urban environment through contextual urban design, appropriate density and integration with the surrounding area. The plan emphasizes the urban environment (including aesthetics and energy efficiency) as central components to the city’s approach to housing development.

In doing so, there is an inherent need to focus on more projects of smaller scale. New Haven is a high-density community (approximately 6,500 residents per square mile) compared to the region (1,500 residents per square mile). Over 60% of all housing units are in structures of four or less units. The prevailing neighborhood pattern is likewise scaled toward single-, two and three-story buildings. To encourage a sustainable, lasting design, affordable housing projects are often scaled to fit the neighborhood.

Group Homes: While there are no specific references to Group Homes in the New Haven Zoning Ordinance, Connecticut Statute provides for a group of six individuals and staff as of right in any residential zone. A home for more than six persons may be permitted by Special Exception in accordance with Section 63.D of the New Haven Zoning Ordinance.

Development and Zoning Constraints: The City’s Zoning Ordinance, which acknowledges the historic, organic patterns of development in New Haven, does not deter the construction of affordable or alternative housing in New Haven. However, the City is fully developed and the high cost of housing production – often on marginal and previously undeveloped land – is the greatest

impediment to the construction of housing for any income group. This impediment is balanced with opportunities to renovate and rehabilitate existing housing.

*Environmental Constraints:* The City's environmental policy, as expressed in the Code of Ordinances and in the Zoning Ordinance, protects sensitive natural resources from over development. The City is mindful of these impediments, especially given that many vacant residential parcels are located on or near tidal wetlands, coastal zones, traprock ridges and similar natural features. Similar constraints – related to air pollution – are found in developed neighborhoods as well. New Haven is located at the intersection of two major highways and hosts a large deepwater port. Potential sites adversely affected by these facilities raise environmental justice and public health issues.

Although the City is fortunate to have many older structures, (there are 5,000 buildings listed in the Historic Building Database), these buildings also have a high probability of containing hazardous materials such as lead-based paint and asbestos. Cost considerations for clean-up and abatement impact financial feasibility. While not all structures are significant architecturally, federal and state requirements regarding the rehabilitation of these homes present another set of considerations when public subsidies are needed to rehabilitate housing and maintain affordability. It is the City's experience that historic preservation requirements are often impediments to renovating and rehabilitating lead-safe, low-maintenance structures. Both of these conditions are integral to the success of the City's housing rehabilitation program. For example, affordable low-maintenance materials would help slow property deterioration and windows covered in lead paint should be replaced to abate lead-paint poisoning hazards. A balance must be found between historic preservation and the reasonable rehabilitation of housing for low-and moderate- income households.

The City has taken advantage of both the State of Connecticut and federal Brownfields programs to assist in site and building remediation for major redevelopment or reuse projects. The use of Brownfields funding to prepare a site or structure for future development or redevelopment helps to reduce construction and site preparation costs.

*Mass Transportation:* Concerns have been raised about the need for improved mass transportation

both within the City and within the region. Efforts to diffuse minority and lower income households require and decentralize affordable housing require that mass transportation be more widely available with better headways and connections. Although commuter rail services are increasing (with mature services along the shoreline and proposed services inland), the public bus system faces both financial and operational problems. In 2002, Connecticut DOT reduced service on 19 local lines and continues to resist efforts to establish the new Cross Town West service, which would connect several inner city neighborhoods with employment destinations in suburban communities.

*Traffic/Parking:* Considerations must be made for additional traffic and parking problems caused by any increase in residential development. Current zoning requires one space per unit. It is clear that this is insufficient for contemporary needs. Increasing the per unit requirements adds costs to residential development yet reduces density in older neighborhoods by limiting the units produced.

*Commercial/Residential Compatibility:* The City is advancing a number of policies designed to encourage more mixed-use redevelopment. Of note, the Board of Aldermen recently passed an amendment to the Zoning Ordinance which allows conversion of upper stories in commercially-zoned mill buildings to live-work spaces.

*Regional Issues:* Suburban responses to the development of affordable housing (except for elderly housing) often meet with regulatory or public opposition. While low mortgage rates have encouraged affordable homeownership – particularly in the inner suburbs – there are few opportunities for affordable rents outside of New Haven.

New Haven, as the central city, is by far the largest center of government-assisted housing in the region. New Haven, with 17,823 (33.7%) units, has the highest percentage of assisted housing of any municipality in the region and provides more than half of all assisted units in the region. In fact, one in every ten listed units in the state is located in New Haven; three in every ten are located in Hartford, New Haven or Bridgeport.

Affordable housing remains an integral component to the city's housing strategy. However, in order

to meet the increasing demand for affordable units, the strategy must be a regional approach. Therefore, a workable, lasting solution must include a balanced approach of market-rate and affordable units, spread more evenly across the entire South Central Connecticut region. In 2003, the regional planning agency will undertake an affordable housing plan and seek strategies to introduce more affordable developments in the suburbs.

Financing: Access to private market financial resources has improved through the creation of the Affordable Housing Fund, a shared risk pool for construction financing of affordable housing in the New Haven region. This fund developed in response to Community Reinvestment Act requirements and the Home Mortgage Disclosure Act reports continue to show discriminating lending patterns.

The City has addressed the lack of mortgage funds for low and moderate income families and has commitments of more than \$5,000,000 from area banks to provide permanent financing for first time buyers of rehabilitated and newly constructed housing. Participating banks agreed to use relaxed underwriting criteria to increase ownership for low-income first time buyers. The City created a homeownership seminar series and provides funds for second mortgages in addition to providing development and rehabilitation incentives.

The City of New Haven, Yale-New Haven Hospital, and Saint Raphaels Hospital and other area employers all have homeownership incentive programs for employees wishing to purchase a home within the City. The purpose of these programs is to stabilize City neighborhoods through increased home ownership and property rehabilitation. The State of Connecticut also has several homeownership assistance programs available to income-eligible households.

Even in eliminating the financial barriers to housing there still remains several problems which are more difficult to diminish.

- 1) There is little available land suitable for new housing construction;
- 2) the rate of building abandonment has been increasing due to a combination of high taxes and slowed economic growth in the region; and
- 3) a negative image which the City is working to overcome in order to attract homeowners

back to the City.

As shown in the following table New Haven provides a substantial portion of the region's subsidized housing. Because regional government and regional solutions to numerous issues do not exist, the City of New Haven bears a disproportionate service burden in addition to providing most of the region's affordable housing. Economic development efforts, service delivery and tax policies must address issues which negatively impact older urban centers.

**Assisted Housing by Municipality  
South Central Connecticut Region**

	<b>Governmentally Assisted Units</b>	<b>CHFA/FmHA Mortgages</b>	<b>Deed Restrictions</b>	<b>Percent Assisted Units</b>
Bethany	0	3	0	0.17
Branford	428	155	0	4.37
East Haven	432	437	0	7.43
Guilford	117	38	0	1.78
Hamden	1,437	546	2	8.46
Madison	90	21	19	1.76
Meriden	3,601	1,360	4	20.16
<b>New Haven</b>	<b>16,074</b>	<b>1,543</b>	<b>206</b>	<b>33.67</b>
North Branford	62	56	0	2.25
North Haven	174	85	0	2.95
Orange	85	10	0	1.95
Wallingford	519	457	2	5.65
West Haven	2,147	683	0	12.67
Woodbridge	16	5	0	0.66

Source: State of Connecticut Department of Economic and Community Development, 2000.

The South Central Connecticut Council of Governments and its member municipalities have recently formed a Regional Housing Choice Task Force. Currently the focus has been on data collection and market analysis of the region. It is anticipated that this group will discuss regional housing issues and needs and work to find collaborative regional solutions. The City will have representatives on the Regional Housing Task Force.

## **2. Neighborhood Revitalization Activities**

Neighborhood revitalization activities take place throughout the entire City as evidenced by an analysis of past CDBG and other neighborhood improvement fund expenditures. Because program eligibility is income based there is no one neighborhood or portion of the City that is underserved by

local neighborhood revitalization activities due to concentrations of minority population. Further analysis of individual revitalization programs and program beneficiaries show usage of programs regardless of race or ethnicity. In fact, depending upon the program or areas served, special outreach to minorities or persons with special needs is often undertaken to increase program participation.

Public involvement on the neighborhood level is the cornerstone of the City's public participation efforts. Coordination with City residents is enhanced by utilizing the City's ten (10) community-based Police substations and their management teams as liaisons between the neighborhoods and the City's administration. In an effort to gear administrative actions to specific neighborhood needs and to promote citizen involvement in crime prevention activities and neighborhood revitalization, the City has returned to the concept of the community-based policing. The individual substations provide "community friendly" more visible police presence. Every substation is headed by a lieutenant who has the responsibility over the substation and its assigned officers. Each substation has a management team comprised of neighborhood residents, business owners or other interested individuals or group representatives who have shown interest in providing leadership to their community. These management teams represent their neighborhoods and are the focus of initial administrative contacts with neighborhood groups and residents. One of the major benefits of this neighborhood-based structure is that neighborhoods and their residents are truly part of the revitalization decision-making. Involvement by residents of all racial, ethnic and economic backgrounds is facilitated by this "local interest planning strategy".

In July 1996, the City established the Livable City Initiative Bureau (LCI). LCI provides a "one stop" information, processing, implementation and monitoring location for housing, community development, and neighborhood revitalization programs and activities. The purpose of LCI is to more efficiently deal with the City's blight problem, work with neighborhood residents and improve the City's livability. LCI's charge is to strengthen and preserve individual neighborhoods through the elimination of abandoned and deterioration housing, through the elimination of blight, through both rehabilitation and selective demolition, and through the effective re-use of property.

The department was developed to facilitate the implementation of the City's Housing and

Community Development Strategy by assigning all necessary City staff and support to one location. To enhance this goal the City assigned neighborhood specialists from LCI to each neighborhood police district. These specialists serve as liaisons between each neighborhood, its residents and the City administration. This method of community outreach and implementation has been a successful change.

In 1998, the City was designated as an Empowerment Zone (EZ) community. This designation and the collaborative efforts undertaken to prepare the EZ Strategic Plan has helped formulate programs, goals and accomplishments for the City's neighborhoods. Empower New Haven, Inc which oversees the implementation of the EZ program has been working with community residents and the City to develop programs and procedures to promote education, job creation, neighborhood improvement and economic development.

The City Plan Department and Empower New Haven recently completed neighborhood plans in three of the Empowerment Zone neighborhoods. In addition, City Plan is completing a new comprehensive plan of land use and development. The plan will include an analysis of existing conditions, planning considerations and recommendations for conservation and development activities for various neighborhoods and the City as a whole. The new comprehensive plan recommends support for new and redevelopment of both market-rate and government-assisted housing in a manner that enhances the urban environment through contextual urban design, appropriate density and integration with the surrounding area. The plan emphasizes the urban environment (including aesthetics and energy efficiency) as central components to the city's approach to housing development.

### **3. Municipal and Other Services**

The level of municipal services available to residents is similar across the entire City. Although sidewalks, curbs, parks and other public infrastructure may be in need of reconstruction and improvement in the City's lower income deteriorating neighborhoods these conditions are not directly related to issues of race or ethnicity. Neighborhood revitalization activities, discussed previously, are addressing the need for improved infrastructure as part of each neighborhood's

development strategy. Access to schools, parks, libraries and other municipal services can be reached from all neighborhoods by the existing public transportation system. Programs and activities to improve accessibility to all persons are funded by the City. People with disabilities are encouraged to participate in all of the City's programs, activities and services. The City provides a variety of types of assistance to enable citizens with disabilities to access all of the City's functions.

#### **4. Employment, Housing and Transportation Linkages**

Concerns have been raised about the need for improved mass transportation both within the City and within the region. Efforts to diffuse minority and lower income households requires that mass transportation be more available. Metro North has added a commuter link between New Haven and its eastern suburbs. A northerly route to assist commuters who travel to the Wallingford and North Haven industrial areas would benefit those who have no other means of transportation. More dependable and varied bus routes within the City would help with both employment and housing choices to residents of all income levels.

#### **5. Public Housing Admissions Procedures**

As of November 2002, all Housing Authority of New Haven (HANH) public housing waiting lists are open, with 2,395 applicants on HANH's family waiting list, 36 on the accessible unit waiting list, and 544 unduplicated applicants on one or more elderly/disabled waiting lists. HANH expects to close some or all public housing waiting lists within the next few months because of the size of current waiting lists. The accessible unit waiting list will remain open.

Some basic characteristics of HANH's Admissions procedures are as follows:

- HANH maintains a separate waiting list for its accessible units.
- HANH maintains site-based waiting lists for each elderly/disabled development and, during FY 2003, HANH intends to implement site-based waiting lists for each family development. The purpose for implementing site-based waiting lists is to increase low income households' choice of affordable housing opportunities.
- An applicant's position on HANH's waiting list(s) is determined on a first-come, first-

served basis according to bedroom size. HANH does not have any preferences or priorities for public housing admissions.

- HANH employs a brief, easy pre-application form for assignment to waiting lists. HANH requires more complete documentation and verifies eligibility later, when an applicant nears the top of his or her waiting list.
- HANH's pre-application includes a form for applicants to authorize third-party notification of all notices related to the applicant's application. This has proven helpful to applicants whose mailing address changes frequently and applicants who benefit from the attention and follow-up of their case managers and service providers.

All HANH procedures regarding public housing applications, waiting lists, eligibility, and admission are provided in HANH's "Admissions and Continued Occupancy Policy" (ACOP). The following are relevant selections from HANH's ACOP.

***Application Intake*** - Section III.A of HANH's ACOP provides procedures for application intake:

Application intake will occur only during public announced time periods during which all interested persons may apply for admission to HANH housing. Notice of opening of waiting lists shall be made in a newspaper of general circulation as well as other suitable means, which notice shall specify the procedures to be employed to determine the position of each applicant on any new waiting list. If HANH determines that any list is too long to reasonably accommodate new applicants, the waiting list may be closed by site or unit size.

During the period that any waiting list is open, HANH will accept pre-applications for a position on the waiting list. Pre-applications that are incomplete in substantive areas may be withdrawn from consideration. Duplicated pre-applications, including applications from a segment of an applicant household, will not be accepted. Upon submission of a complete pre-application, the applicant will be assigned positions on one or more waiting lists.

***Organization of Waiting Lists*** - Section III.B of HANH's ACOP provides procedures for the

organization of HANH's waiting lists:

HANH maintains the following waiting lists distinguished by housing types:

- a) One accessible unit list for persons requiring accessibility features.
- b) Site-based waiting lists for each mixed population [elderly/disabled] development, open to elderly and disabled applicants. Applicants may apply for positions on up to 3 site-based waiting lists.
- c) One General Occupancy [family] list for units in family developments.

Each waiting list is further broken down by bedroom size.

Applicants may concurrently hold positions on up to 3 site-based waiting lists, the accessible unit list, and the General Occupancy list (until HANH replaces the General Occupancy list with site-based lists for family developments), as well as any Section 8 waiting lists.

HANH may develop additional waiting lists to promote specific asset management strategies or agency goals, including but not limited to the following:

- a) HANH may implement site-based waiting lists for each of its General Occupancy developments. Site-based waiting lists will not be implemented for properties scheduled for redevelopment.
- b) HANH has received HUD approval of elderly designation of four of its Mixed Population developments. Upon implementation of HANH's approved elderly designation plan, site-based waiting lists for those four developments will be open only to elderly applicants. Near-elderly disabled applicants may also apply but will be offered a unit in elderly-designated buildings only if there are no elderly applicants.

***Placement on Waiting Lists*** - Section III.C of HANH's ACOP provides procedures for placement on waiting lists:

An applicant will be assigned to one or more waiting lists according to the housing type and bedroom size for which the family is eligible. The applicant's position on any waiting list is governed by the date and time that the application was initially provided and the size of unit required. Short-term waiting list openings may be done by lottery.

The applicant will be informed of his/her assigned application number and how to check his/her status on the waiting list and will be provided with a date stamped copy of his/her application. The applicant will also be provided information on the housing program and its requirements.

***Final Eligibility Determinations*** - Section III.H of HANH's ACOP provides procedures for final eligibility determinations when an applicant has reached the top of his/her waiting list:

1. Final Eligibility Determination. When HANH estimates that a unit will be available within the next several months, an applicant's preliminary application is reviewed. If the applicant is determined to be ineligible based on information provided in the pre-application, HANH will notify the applicant in writing, state the reasons, and inform the applicant of his/her right to an informal review under the Grievance Procedures provided in this ACOP. If HANH staff determines that the applicant is eligible based on the pre-application, the applicant is invited to attend an interview to commence the formal verification process and resident selection process.
2. Verification of Eligibility. Each applicant household shall be required to provide all information and authorizations necessary to enable staff to verify the applicant's income eligibility, household composition and conformance to HANH's eligibility criteria.
  - a) Each applicant household shall have an interview with a member of the HANH Service Center staff. Every member of the applicant household age 18 or older should be present at the office visit except when there are extenuating circumstances.
  - b) Information may be required for any or all household members. Verification shall be from third party sources whenever possible. However, the applicant shall not be penalized either by denial of admission or by unreasonably delay of placement solely

because third party sources have failed to respond to requests for information.

4. All verifications and documentation received by HANH will be used for a determination made with respect to:
  - Eligibility of the applicant family for admission or continued occupancy, based on the requirements outlined in Section II of this Policy.
  - Unit size requirements.
5. Applicants determined to be ineligible for housing at HANH will be promptly notified and will receive a Notice of Rejection from HANH stating the basis for this determination of ineligibility. HANH will provide such applicants with the opportunity for informal review of the decision in accordance with the HUD regulations and the procedure for a grievance hearing contained in HANH's Grievance Procedures.
6. Applicants who have disabilities and have been determined to be otherwise eligible but who fail the eligibility criteria will have their cases examined by HANH to determine whether mitigating circumstances or reasonable accommodations will make it possible for them to be housed in accordance with the eligibility criteria outlined therein.
7. Changes in Unit Size Determination: If, during the final eligibility determination, or at any other time prior to placement, it is determined that the family composition has changed, making the family eligible for a different size unit, the family's application shall be placed on the waiting list for the new units size based on the *original* date of the family's pre-application.
8. If assistance to the family is to be denied on the basis of immigrant status the tenant may make an INS appeal as described in HANH's Grievance Procedures.

***Eligibility Criteria*** - Section II of HANH's ACOP specifies the eligibility criteria for admission to public housing; these are outlined in Section II.A:

It is the policy of HANH to admit only eligible applicant families according to the following criteria:

1. Those who qualify as a family, single person, elderly person, near-elderly person, remaining adult member or legal guardian of the remaining minor member(s) of a tenant family under specified circumstances.
2. Those whose annual income at the time of admission does not exceed the income limits established for occupancy as prescribed by HUD. A copy of the most current income limits shall be conspicuously posted at HANH locations.
3. Those whose members including children have provided a Social Security number. A family member who does not have a Social Security number may be required to apply for one or provide written certification that he/she does not have and is not eligible to receive a Social Security number. The terms of this criteria are specified in Section II.F, "Mandatory Social Security Numbers."
4. Those where at least one member of the household is either a citizen or eligible no citizen. The terms of this criteria are specified in Section II.E, "Eligibility Restrictions Regarding No citizens."
5. Those who do not maintain another residence in addition to a HANH unit.
6. Those whose members do not have a record of criminal activity or drug related activity that would adversely affect the health, safety, or right to peaceful enjoyment of others. The terms of this criteria are specified in Section II.B, "Ineligibility Because of Drug-Related or Criminal Activity."
7. Those who have the ability, with or without assistance, to maintain their housing in a safe and decent condition, to live peaceably with neighbors, and to otherwise be lease compliant. The terms of this criteria are specified in Section II.C, "Eligibility Criteria Related to Family's Capacity to Comply with HANH's Lease."
8. Those whose members have not committed fraud, bribery or other corruption in connection with any Federal Housing Assistance program.
9. Those whose members do not owe rent or other moneys in connection with any Federal Housing Assistance program or any other subsidized housing program.

10. Those whose members have signed such consent forms as HANH shall require.
11. Those who have completed the application screening process, supplying information or documentation within the specified time frames (including but not limited to requests to declare continued interest in the program and satisfactory home visits).

***Offer of a Unit*** - Section III.I of HANH's ACOP provides procedures for the offer of available units:

When housing becomes available for lease, it will be offered in writing to the applicant with the earliest application for that housing type and bedroom size. An applicant will be offered a choice between two different units at two different sites. An applicant must accept or reject the offer within three business days from the date an offer is made. If both offers are rejected or the applicant does not respond, the applicant will be removed from all HANH public housing waiting lists except for the accessible unit waiting list and must reapply if housing assistance is still desired. If the applicant is also on the Section 8 waiting list, this will not affect their placement on the Section 8 list.

***Admission to HANH Scattered Site Units*** - Section VIII.F of HANH's ACOP governs admissions to HANH's scattered site public housing units. HANH's policy gives preference to internal transfers, and the demand by current public housing families for our scattered site units is high. In 2002 revisions to HANH's ACOP, HANH has given priority in internal transfers to scattered site units to families who are active participants in HANH's Family Self-Sufficiency Program. HANH's policy is as follows:

In filling vacancies in scattered site units, transfers will take precedence over admissions. Tenants wishing to transfer or who have been referred by Housing Authority staff must meet the criteria for scattered site units established by the Board of Commissioners. Preference in transfers to scattered site units will be given to families whose head of household or wage earner has been enrolled in HANH's Family Self-Sufficiency Program for a minimum of one year and is employed and has been consistently employed for a minimum of one year.

***Admission to HANH's Accessible Units*** - Section III.J of HANH's ACOP provides procedures for admission to an accessible public housing unit:

When an accessible unit becomes available, HANH shall offer the unit in the following order:

1. To current HANH tenants who have special housing needs and would benefit from the unit's accessible features, but whose current unit does not have such features. If there is more than one current tenant requiring the accessibility features of the available unit, the family with the earliest written request for a transfer shall be selected for the unit.
2. To eligible and qualified households on the accessible unit waiting list who have special housing needs and would benefit from the unit's accessibility features. An accessible unit shall be offered first to households who need the specific features of the available unit before it would be offered to any person without accessibility needs.
3. Thereafter, an accessible unit shall be offered to households without disabilities on the waiting list based on earlier application dates. A resident who does not have a disability will agree in writing to relocate to another unit if an eligible person with a disability applies to public housing.

HANH's procedures related to transfers to or from an accessible unit are provided in Section VIII.D of HANH's ACOP:

1. *Residents Who Need an Accessible Unit* - HANH residents in need of an accessible unit may apply to be placed on a special transfer list for HANH's accessible units, subject to verification of the resident's need for accessible features or reasonable accommodations. Applicants in need of accessibility features who accept a non-accessible unit because no accessible unit is available will, at admission, be offered a place on this transfer list. Positions on this transfer list will be assigned according to bedroom size and the date and time of the initial application for transfer. Current residents will receive priority in the assignment of available accessible units above any persons on HANH's waiting lists.
2. *Residents who Live in Accessible Units but do not Need Accessibility Features* - When an

accessible unit is available but there is no family on HANH's accessible unit waiting list in need of an apartment with its specific accessibility features and bedroom size, HANH will offer the accessible unit to the next family on its waiting lists, but will require the family to consent to a future transfer when HANH has a resident or applicant family in need of the apartment's accessibility features.

HANH will maintain a list of households residing in accessible units but not needing their apartments' accessibility features, who will be required to transfer when HANH has a resident or applicant in need of the apartment's accessibility features. The resident family will be offered two units of appropriate bedroom size before they are required to move.

***HANH's Public Housing Anti-Discrimination Policies*** - Section I of HANH's ACOP provides HANH's anti-discrimination policies:

**Fair Housing and Equal Opportunity Policy**

It is the policy of HANH to comply fully with the Americans with Disabilities Act, Title IX of the Education Amendments Act of 1972, the Fair Housing Act, Title VI of the Civil Rights Act of 1964, section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, section 109 of the Housing and Community Development Act of 1974, all Fair Housing and Civil Rights laws, statutes, regulations, and Executive orders as enumerated in 24 CFR 5.105(a), and any applicable federal, state, and local laws and regulations protecting individual rights of tenants, applicants or staff that may subsequently be enacted.

HANH will not discriminate because of race, color, gender, sexual preference, religion, age, disability, national origin, or marital or familial status, or any other legally protected status in the leasing, rental or other disposition of real or personal property under its jurisdiction covered by a contract for annual contribution under the United States Housing Act of 1937, as amended, or in the use or occupancy thereof.

HANH shall not deny admission to any particular group or category of otherwise eligible families nor will any criteria be applied, or information be considered, pertaining to attributes or behavior that may be imputed by some to a particular group or category. All criteria applied and information considered in administering this policy shall relate solely to the attributes and behavior of the individual members of the household.

### **ADA Compliance**

The Americans with Disabilities Act (ADA) prohibits discrimination on the basis of disability and requires public agencies to provide reasonable accommodations to qualified disabled individuals, so long as accommodations do not impose an undue financial burden on the agency.

Persons protected under the ADA include any person who (a) has a physical or mental impairment that substantially limits one or more of the major life activities of an individual, or (b) has a record of such impairment, or (c) is regarded as having such an impairment. Rehabilitated former drug users and alcoholics are covered under the ADA. However, a current drug user is not covered. In accordance with the ADA definition of “disability”, individuals are not considered disabled for eligibility purposes solely on the basis of any drug or alcohol dependence. Individuals whose drug or alcohol addiction is a material factor to their disability are excluded from the definition. Individuals are considered disabled if disabling mental and physical limitations would persist if drug or alcohol abuse discontinued.

It is the policy of HANH to provide its services and programming in a fair and impartial manner. HANH does not discriminate on the basis of disability in admission to, access to, or operation of its programs, services, or activities. HANH is committed to identifying and eliminating situations that create barriers to equal housing for all, and HANH will make such procedural, administrative, locational or physical changes as will reasonably accommodate persons with disability and which do not impose an unreasonable burden on HANH.

## **Reasonable Accommodations Policy**

HANH will provide reasonable accommodations for persons with disabilities, including such procedural, administrative, locational, or physical changes as will reasonably accommodate the known physical or mental disabilities, unless the accommodation would impose an undue burden on the agency. HANH's Reasonable Accommodations policy is intended to afford persons with disabilities an equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement as those who do not have disabilities. It is applicable to all situations described in this ACOP.

1. *Request for Accommodation.* A participant with a disability must first ask for a specific change to a policy or practice as an accommodation of his or her disability before HANH will treat a person differently than anyone else. HANH will provide a written decision to the person requesting the accommodation within a reasonable time.
2. *Verification of Qualifying Disability.* HANH will require verification of a person's status as a qualified person with a disability protected under the ADA. HANH may require such verification be conducted by an independent medical examiner of its choosing. Once the person's status as a qualified person with a disability is confirmed, HANH will require that an independent medical examiner or other professional third party competent to make the assessment provides written verification that the person needs the specific accommodation due to their disability and the change is required for them to have equal access to the housing program.
3. *Undue Burden.* If HANH finds that the requested accommodation creates an undue administrative or financial burden, HANH will either deny the request and/or present an alternative accommodation that will still meet the need of the person.

An undue administrative burden is one that requires a fundamental alteration of the essential functions of HANH (e.g., waiving a family obligation.) An undue financial burden is one that, when considering the available resources of the agency as a whole, would pose a severe financial hardship on HANH.

4. *Grievance Procedures.* If a person is denied the accommodation or feels that the alternative suggestions are inadequate, they may request a grievance hearing to review HANH's decision, using the Grievance Procedures provided in this ACOP. Reasonable accommodation will be made for persons with a disability that require an advocate or accessible offices. A designee will be allowed to provide information, but only with the permission of the person with the disability.

### **Accommodations for Non-English Speaking Persons**

HANH has bilingual staff to assist Spanish speaking persons and to translate documents into Spanish.

In determining whether it is feasible to translate documents into languages other than Spanish and English, HANH will consider the following factors:

- The number of participants who do not speak English and speak the other language.
- The cost of the translation into the other language per applicant or resident who speaks the language.
- An evaluation of the need for translation by the bilingual staff and by agencies that work with the non-English speaking persons.
- The availability of organizations to translate documents, letters and forms for non-English speaking persons.
- The availability of bilingual staff to explain documents to applicants and residents.

### **Grievance Procedures**

HANH has established Informal Review Procedures under which applicants may appeal any HANH decision denying assistance to an applicant, including decisions denying placement on the waiting list or denying participation in the public housing program.

In addition, HANH has established Grievance Procedures under which applicants and participants may receive an informal hearing before an impartial hearing officer.

## 6. Occupancy Characteristics of HANH Program Participants

### *Public Housing*

As shown in the following table, according to October 2002 occupancy, Black non-Hispanic households occupy 73% of HANH public housing units, Hispanic households occupy 17%, and white non-Hispanic households occupy 9%. To date, there have been no claims of racial or ethnic discrimination against Housing Authority placement procedures.

**Racial and Ethnic Mix of HANH Public Housing Families**

<b>Development</b>	<b>Total Households</b>	<b>% Black non-Hispanic</b>	<b>% Hispanic</b>	<b>% White non-Hispanic</b>	<b>% Other Race</b>
Essex Townhouses (F)	33	61%	33%	6%	0%
Eastview Terrace (F)	118	59%	34%	6%	1%
Quinnipiac Terrace (F)	167	63%	32%	3%	2%
Fairmont Heights (E/D)	86	51%	13%	36%	0%
Ruoppolo Manor (E/D)	80	57%	23%	18%	1%
K Harvey Terrace (E/D)	17	65%	24%	12%	0%
Newhall Gardens (E/D)	29	93%	0%	7%	0%
P Bush Mall (E/D)	44	93%	5%	2%	0%
CB Motley (E/D)	43	86%	2%	12%	0%
William T. Rowe (E/D)	101	84%	8%	6%	2%
Winslow-Celentano (E/D)	42	52%	26%	19%	2%
Farnam Courts (F)	218	69%	27%	3%	0%
County & Henry (F)	2	100%	0%	0%	0%
Robert T. Wolfe (E/D)	86	60%	20%	19%	1%
McQueeney Tower (E/D)	114	63%	18%	18%	0%
McConaughy Terrace (F)	184	90%	7%	4%	0%
Valley Townhouses (F)	39	90%	10%	0%	0%
Waverly Townhouses (F)	47	74%	23%	2%	0%
Crawford Manor (F)	75	67%	17%	16%	0%
Val Macri Court (E/D)	13	31%	54%	15%	0%
Winter Gardens (F)	1	100%	0%	0%	0%
Brookside (F)	149	90%	8%	1%	1%
Westville Manor (F)	142	89%	7%	4%	0%
Rockview (F)	2	100%	0%	0%	0%
Ribicoff Cottages (E/D)	39	85%	5%	8%	3%
Ribicoff Extension (E/D)	59	80%	7%	14%	0%
<b>Totals</b>	<b>1948</b>	<b>73%</b>	<b>17%</b>	<b>9%</b>	<b>1%</b>

\* "F" = Family Development

"E/D" = Elderly/Disabled Development

More than one-third (35%) of HANH's public housing households report having a family member with a disability.

## Section 8

As of October 2002, among households using HANH Section 8 vouchers, 57% are Black non-Hispanic, 31% are Hispanic, and 11% are white non-Hispanic. Roughly one-quarter of Section 8 households report having a family member with a disability.

### 7. Housing Choices for HANH Section 8 Voucher Holders

HANH encourages Section 8 voucher holders to look for housing outside areas with high concentrations of minority or low-income population. HANH has collaborated on an ongoing basis with landlords and HOME, Inc., a private property management company, which offers free mobility counseling to participants. The attached tables identify voucher distribution within New Haven, as well the portability vouchers used outside of New Haven.

**Voucher Distribution Within New Haven Census Tracts**

Census Tract	Number of Vouchers	Percent of Total New Haven Vouchers
1401	80	3%
1402	15	1%
1403	77	3%
1404	123	4%
1405	105	4%
1406	156	5%
1407	409	14%
1408	106	4%
1409	107	4%
1410	24	1%
1411	32	1%
1412	86	3%
1413	67	2%
1414	123	4%
1415	197	7%
1416	120	4%
1417	3	0%
1418	40	1%
1419	13	0%
1420	4	0%
1421	14	0%
1422	9	0%
1423	152	5%
1424	150	5%
1425	132	5%
1426.01	110	4%
1426.02	75	3%
1427	80	3%
1428	6	0%
n/a	255	9%
<b>Total Vouchers Used in New Haven</b>	<b>2,870</b>	<b>100%</b>

**Distribution of HANH Portability Vouchers**

<b>Place</b>	<b>Number of Vouchers</b>	<b>% of Total Portable Vouchers</b>
Within Connecticut		
Danbury	1	1%
East Haven	44	36%
Hamden	26	21%
New Britain	1	1%
Waterbury	11	9%
CT Total	83	68%
Out of State		
Alabama	1	1%
Florida	15	12%
Georgia	2	2%
Massachusetts	1	1%
North Carolina	4	3%
New Hampshire	1	1%
South Carolina	4	3%
Puerto Rico	11	9%
Out of State Total	39	32%
<b>Total</b>	<b>122</b>	<b>100%</b>

HANH’s Service Center (which administers HANH’s Section 8 program) is also working with Section 8 landlords and the City of New Haven’s Office for Persons with Disabilities to promote transformation of existing apartments into handicap accessible units. Landlord workshops were held to heighten awareness of the growing housing needs and scarce availability of accessible housing. HANH identified several accessible housing resources for owners wishing to help meet this need and highlighted the various incentives, particularly the potential for higher payment standards under the Section 8 program. HANH’s Service Center created a referral system for the City of New Haven Office for Persons with Disabilities via the Section 8 apartment listing. HANH hopes to expand our computer capabilities to be able one day to share this information on-line to reach broader populations in need.

**8. Sale of Subsidized Housing and Possible Displacement**

In 1993, the Housing Authority of New Haven was awarded an Urban Revitalization Demonstration (now HOPE VI) grant to rehabilitate the 462-unit Elm Haven public housing development, the oldest public housing development in the city. The settlement of litigation related to the demolition of 366

Elm Haven units and the relocation of occupants resulted in the Elm Haven Extension Replacement Housing Program. Under the Elm Haven Extension Replacement Housing Program, half of the 366 demolished units were replaced with Section 8 subsidies for privately-owned rental units. The remaining half, 183 units, are being replaced with scattered site public housing units which, according to the settlement agreement, must be located in non-impacted areas.

The innovative scattered site program provides choice public housing units, in single-family homes and small developments, located in middle-class neighborhoods. These units are owned by the Housing Authority and managed by HOME Inc., a nonprofit property management organization. Initially, there was a great deal of local opposition to the scattered site program's impact on property values and neighborhood stability. Today, because of HOME Inc.'s effective management, the scattered site public housing program is generally considered a success. In most neighborhoods, scattered site public housing units are generally indistinguishable from privately-owned properties.

As of December 2002, the Housing Authority has acquired 154 units of scattered site housing in non-impacted neighborhoods. The Housing Authority is working aggressively to purchase or develop the remaining 29 scattered site units required under the settlement agreement.

## **9. Housing Authority Efforts to Increase Homeownership**

**Affordable Homeownership Opportunities.** The City of New Haven has an inordinately low homeownership rate—less than 30% --compared to the 68% homeownership rate nation-wide. The City of New Haven has made a high priority of increasing homeownership in the City, particularly affordable homeownership opportunities accessible to City residents. The Housing Authority is committed to developing homeownership opportunities, particularly affordable homeownership opportunities accessible to HANH program participants and other low-income families, as part of HANH's redevelopment plans.

The Housing Authority's HOPE VI redevelopment of its Elm Haven (now Monterey Place) public

housing development includes the construction of affordable homeownership units. HANH's proposed HOPE VI redevelopment of the Quinnipiac Terrace/Riverview sites also will include homeownership units, including ten public housing replacement homeownership units with subsidies to enable their purchase by low income public housing families. Likewise, HANH's planned redevelopment of West Rock will include affordable homeownership units.

HANH has resources, services, and housing assistance to help its program participants access homeownership opportunities.

**Homeownership Supportive Services for Public Housing Residents.** In November 2002, HANH learned that it is awarded a HUD ROSS grant for Homeownership Supportive Services for public housing residents. This grant will fund the majority of a \$500,000 program to provide an intensive program of homeownership training, counseling, and case management to fifty public housing families over the next three years. The program has specific eligibility requirements, including work and minimum income requirements, and is limited to families who actively participate in HANH's Family Self-Sufficiency Program.

The Housing Authority's program for homeownership training and counseling builds upon numerous city-wide programs, services, and resources designed to increase homeownership opportunities for city residents.

**Section 8 Homeownership Program.** HANH has implemented a Section 8 Homeownership Program (SEHOP) which permits qualifying Section 8 participants to apply their housing assistance to monthly mortgage payments. As of November 2002, HANH has two families ready to purchase homes and receive Section 8 homeownership assistance.

## **10. Efforts to Improve Coordination and Inter-Agency Cooperation**

### **Improved Coordination - Continuum for Success**

In 2001, HANH organized the Continuum for Success, a group of HANH staff, state and city officials, service providers, and advocates, for the purpose of finding creative ways of sharing resources to better serve persons with disabilities. The Continuum for Success has proven to be a particularly effective partnership with monthly meetings for over a year and a half. During that time, the Continuum for Success has produced concrete results: (1) the development of the Ruoppolo Supportive Housing Program, on-site supportive housing services in HANH's Matthew Ruoppolo Manor elderly/disabled development and (2) HANH's Project-Based Voucher project to develop, in collaboration with service providers, additional supportive housing units.

### **Landlord Workshops**

The Housing Authority Service Center conducts quarterly workshops for Section 8 landlords with topics such as available resources to support accessibility renovations in private rental units. The landlord workshops have two primary purposes: (1) to provide information and resources in support of housing goals (such as the increased supply of accessible units), and (2) to build effective communications and working relationships in order to increase the supply of Section 8 landlords.

## **11. Efforts to Provide Additional Supportive Housing**

The Housing Authority has increasingly recognized the substantial need for supportive housing services to help many of our residents maintain lease compliance, build self-sufficiency and maintain independent living, and function successfully within their communities. In partnership with ALSO/Cornerstone, the Housing Authority has developed an on-site supportive housing program in its Matthew Ruoppolo Manor development, an elderly/disabled building of 116 units. The Ruoppolo Supportive Housing Program has operated since 2001 and, with 23 funded service slots, has been enormously effective in engaging many of the Housing Authority's most troubled residents. The

Housing Authority is seeking resources to expand the Ruoppolo Supportive Housing Program and to develop similar on-site programming in its other elderly/disabled developments.

In addition, the Housing Authority is developing plans for converting its William T. Rowe development, an elderly/disabled building of 176 total units, into a full-service, round-the-clock supportive housing program. Adjacent to one of New Haven's major medical centers, William T. Rowe is advantageously sited for both supportive housing and for commercial development. Current proposals include major redevelopment to provide market-rate commercial office space on lower floors, the proceeds of which will fund services for supportive housing units on the upper floors.

### **Additional Assisted Living Opportunities**

The City of New Haven's Consolidated Plan indicates a substantial need for the development of additional assisted living facilities, particularly affordable assisted living facilities. During the next two to five years the Housing Authority plans to convert one of its developments into an affordable assisted living facility.

### **Project-Based Supportive Housing Programs**

In recognition of the community's need for affordable supportive housing, The Housing Authority has committed 100 of its Section 8 vouchers to project-based voucher supportive housing programs. In 2002, the Housing Authority issued an RFP inviting supportive housing providers to apply for resources to develop Section 8 project-based supportive housing programs. As a result of this RFP, the Housing Authority has committed to providing Section 8 resources for four project-based voucher supportive housing programs, totaling 42 units. The Housing Authority plans to issue a new RFP for the development of additional project-based supportive housing programs.

In addition, HANH has committed 121 vouchers to a state-wide effort to develop additional project-based supportive housing units. This collaborative includes other Connecticut public housing authorities, the Connecticut Housing Coalition, the Technical Assistance Collaborative, and the Connecticut Housing Finance Authority.

**B. Fair Housing and the Disability Community**

In major cities and throughout the United States the issue of fair housing and discrimination goes beyond the issue of racial and ethnic minorities to include issues and barriers faced by persons with disabilities of varying types. In New Haven, the Department of Services for Persons with Disabilities and the Commission on Disabilities advocate the rights of the disability community. As part of this effort, an analysis of fair housing and the disability community was undertaken. An overview of fair housing issues provided as part of the City's Analysis to Impediments revealed that for many disabled people, the search for safe affordable housing in New Haven can prove to be one of life's more difficult challenges. And, for anyone needing wheelchair accessible and/or multiple bedroom accommodations, the difficulties may sometimes appear insurmountable.

Despite a concerted community effort to affirmatively further fair housing, many disabled people continue to face limited and unpalatable housing choices. This is because the barriers facing the disability community go far beyond the “de jure” barriers to equal housing opportunity. A community may succeed in eliminating unlawful impediments to fair housing without creating a significant increase in real housing opportunity for the disabled.

A majority of persons with disabilities receive SSI with a monthly payment of \$545 total benefits. Fair Market Rent in New Haven is \$635 for a one bedroom. Housing costs, which typically should be less than 30% of income are out of reach for many persons with disabilities. Without subsidized housing, many persons receiving SSI cannot afford housing.

Even with Section 8 vouchers, wheelchair accessibility becomes another obstacle within the private housing stock. Although Fair Housing Laws allow persons to make temporary modifications to rental units, the cost of putting in temporary ramps or finding bathrooms or doorways that will accommodate wheelchair needs is financially prohibitive. Therefore, housing in buildings built after 1988, which should be adaptable and have wheelchair access is the most practical solution however, within the City, the number of buildings built after

1988 is limited.

Although there are significant tax credit incentives for landlords to retrofit their apartments for wheelchair accessibility, this has proven to be an unsuccessful avenue. Coordinating the retrofit while losing revenue needs to be significantly streamlined into one contract, and done very quickly, as landlords lose money during this time lost. Added to this, there is no one single source to assist landlords through the retrofitting process. Although the Department of Services for Persons with Disabilities has been in touch with the Corporation for Independent Living for technical advice for landlords, they have a long wait list and are sometimes not able to even look at an apartment for a few weeks. Landlords also must provide detailed tax credit information, interact with the New Haven Housing Authority, etc. With this process many weeks can go by just trying to coordinate these various entities. With the length and frustration of the process many landlords get discouraged, cannot afford the lack of revenue and choose to abandon the effort.

For far too many people with disabilities, a "fair housing choice" - a range of housing opportunity which conforms to HUD's fair housing rule at 24 CFR Part 100 and/or its 504 rule at 24 CFR Part 8 - is not necessarily an adequate housing choice. Consequently, the Department of Services for Persons with Disabilities and the Commission on Disabilities focus on the larger housing needs and concerns of the disability community in addition to those issues which fall under the rubric of fair housing.

With respect to fair housing, the Department of Services for Persons with Disabilities and the Commission on Disabilities have: disseminated information about the rights of the disabled set forth in Parts 8 and 100; referred complaints to agencies which have enforcement authority (CEO and HUD); worked with disabled tenants and landlords to resolve accommodations problems; conducted public forums; and, in one instance, even filed a complaint with HUD on behalf of the disability community. That complaint, filed against the Housing Authority of New Haven (HANH) on 12 August 1992, led to the development of

a voluntary compliance agreement between HUD and HANH which was finalized in July 1993. The complaint challenged the Housing Authority's advertisement and application process with regards to the disabled community.

With respect to the larger policy issues and housing concerns, these agencies have played an active role in development of past municipal CHAS and Consolidated Plan submissions, corresponded with state, local and federal legislators, offered testimony on HUD's occupancy standards in public and assisted housing, and, as noted above, held public forums on housing issues.

The Department and the Commission have developed a series of housing issues to clarify the most pressing needs of the disability community. These include:

1. Too little accessible and affordable housing available for families with mobility impaired members. This includes especially mothers/fathers in wheelchairs with school-age children and single-parent families with children who are disabled. There is also a need for more adaptable housing units.
2. Too few Section 8 or RAP Certificates available for families with disabled members to find their own housing. More Section 8 housing needs to be made accessible by rehabilitation. The Department of Services for Persons with Disabilities has made several suggestions as to how this may be accomplished. First and foremost, a specific goal and objectives should be established which are supported by staff expertise and resources. A program which provides qualified landlords with the funding to make units accessible and/or resources to help landlords through the process should be considered. Such a program could be a collaborative effort between the Department of Services for Persons with Disabilities, the Housing Authority and LCI.

Although the Department of Services for Persons with Disabilities now has the Housing Authority refer interested landlords to their department, the process needs to be streamlined offering technical expertise, more financial incentives to cover costs, and rapid response to section 8 inquiries.

3. No comprehensive listing of accessible housing is available from any source in Connecticut. Various lists with other criteria are issued such as the Housing Authority Section 8 listing. This makes it very difficult for advocates to help families without a lot of familiarity with the housing market. The State Department of Economic and Community Development should make lists of rental housing available with a notation of which units are accessible or adaptable.

Efforts by the Department of Services for Persons with Disabilities to obtain information from federally subsidized housing management companies and the State office of HUD have been made but a complete and thorough disclosure of the requested information has not yet been received. The Department has also made initial contact with DECD to ensure that New Haven is included in any listing of accessible housing.

4. Additional loans and tax relief are needed as incentives to make current housing accessible.
5. Housing Authority. In the City's original Analysis of Impediments to Fair Housing Choice completed in 1995, a number of issues relating to Fair Housing and the Disability Community, as they relate to public housing, were raised. These included:
  - a. Long waiting lists for family units.
  - b. Disabled applicants should be able to apply on an on-going basis and placed on a separate waiting list.

- c. No way of matching applicant in need of accessible housing with the few barrier-free units.
- d. Need for more 2 and 3 bedroom accessible units.
- e. Poor security.
- f. No on-site management or control.
- g. A history of inadequate screening of applicants.
- h. Lack of cooperation with agencies serving the needs of people with disabilities.
- i. Long term plan must include more fully accessible units and some provision for knowing what the demand for them will be.

Since the completion of the original Analysis of Impediments to Fair Housing Choice the Housing Authority has made numerous administrative, management and policy changes that have begun to address the issues identified.

The Department of Services for Persons with Disabilities and the Commission on Disabilities have been working together with the Housing Authority of New Haven (HANH) to address the affordable housing needs of persons with disabilities, including the following actions undertaken or underway to address identified issues:

- The need for increased numbers of accessible public housing units. The Housing Authority is undertaking major renovations and redevelopment plans that will result in at least 105 additional subsidized accessible units, and it is committed to developing accessibility features in all major renovations and redevelopment.
- The need for ensuring that accessible units meet Section 504 standards and meet the needs of persons with mobility impairments. HANH is currently in the process of conducting an evaluation of all accessible units to identify any deficiencies in 504 compliance and renovations necessary to make units compliant with accessibility standards.

- The need to aggressively act upon HANH policies intended to ensure that its accessible housing resources are channeled to families in need of accessible units. Only within the past decade did HANH implement policies designed to ensure that its accessible housing units would be channeled, through a preference system of a separate waiting list and through internal transfer procedures, to families in need of accessibility features. As a result, several of HANH's accessible units are occupied by families who do not need an accessible unit. HANH is currently in the process of reviewing and surveying current occupants of its accessible units in order to determine whether units' accessibility features are needed by current occupants and, according to HANH policies, will transfer current occupants who do not need an accessible unit when there is a demand for that unit from a family requiring accessibility features.
- The need for long term planning in public housing redevelopment and renovations that is responsive to the needs of the community. HANH's development of accessible units is governed by a Transition Plan that identifies how HANH will achieve federally-required levels of accessible housing units. HANH is currently in the process of revising its Transition Plan so that it reflects current plans for redevelopment and major renovations, which include the development of additional accessible, adaptable and visitable public housing units. HANH's new Department of Construction and Design Management is committed to the principles of accessibility, including design practices that incorporate accessible, adaptable and/or visitable features wherever possible.
- The difficulties that many persons with disabilities face in effectively complying with HANH application and recertification procedures. As a result of conversations with agencies, service providers and advocates for persons with disabilities, HANH has added a "third party authorization" for release of information so that HANH's contacts with applicants will also be

mailed to authorized service providers and others who may help applicants and residents respond to HANH's required requests for information.

- Inadequacies of public housing units that may make public housing an unviable option for many families with disabilities, including poor security, poor on-site management, and a history of inadequate screening of applicants. During recent years, HANH has implemented a much more effective management structure, including a more effective screening of applicants. At the same time, HANH believes that the problems in its developments may be better addressed through provision of services rather than through a screening process that effectually "creams" applicants by denying admission to persons who might maintain housing effectively with the receipt of proper services.
- Coordination with service providers, agencies and advocates serving persons with disabilities. In collaboration with the Department of Services for Persons with Disabilities, the Housing Authority has initiated monthly meetings, the Continuum for Success, to facilitate communication between HANH and service providers and to develop innovative methods of combining HANH's housing resources with service-related dollars to better meet the needs of New Haven's disabled population.

6. Almost no congregate housing is available for people who need in-house social services or some food service to live outside of institutions such as hospitals, nursing homes and mental health facilities. Tower I and Casa Otonal are exceptions.
7. Very little SRO space is available. Many traditional rooming houses and guesthouses have gone out of business. Some guesthouses now accept only residents referred by the State with high subsidy. What is available is generally not accessible for people with mobility impairments.
8. The Department of Services for Persons with Disabilities completed an assessment

for all city-funded shelters for accessibility in the year 2001. It has also made clear that while personal assistance is outside the expectation of the shelters, personal care attendants are allowed to come into shelters from outside sources where needed. As well, each shelter now has a designated ADA Coordinator.

9. Exploration of alternative housing initiatives such as shared housing, mutual housing and cooperative housing.

## C. Private Sector

### 1. Lending Policies and Practices

To assess the impact of local lending policies and practices on fair housing choice recent Home Mortgage Disclosure Data (HMDA) was reviewed. The data analyzed was published by the Federal Financial Institutions Examination Council's (FFIEC). The Council is a formal interagency body empowered to prescribe uniform principles, standards, and report forms for the federal examination of financial institutions by the Board of Governors of the Federal Reserve System (FRB), the Federal Deposit Insurance Corporation (FDIC), the National Credit Union Administration (NCUA), the Office of the Comptroller of the Currency (OCC), and the Office of Thrift Supervision (OTS) and to make recommendations to promote uniformity in the supervision of financial institutions.

The Home Mortgage Disclosure Act (HMDA) enacted by Congress in 1975 and implemented by the Federal Reserve Board, requires lending institutions to report public loan data. The data is available by Census Tract within the New Haven-Meriden, CT Metropolitan Statistical Area.

The following table depicts Home Purchase Loan Statistics for 2001 by Census Tract as taken from the HMDA data. As shown by these statistics, census tracts with higher concentrations of minority population and census tracts with high concentrations of low-income households had higher rates of loan application denial. Applications received from low-income census tracts (defined as census tracts with median incomes below 80% of the median income in New Haven County) and minority census tracts (defined as census tracts with a combined percentage of black and Hispanic residents have 40%) were also less likely to result in loan originations. Unfortunately, the method in which the HMDA data is published does not enable a true correlation of loan denial, race and credit worthiness on a local level. Regardless, the statistics do highlight those areas within the City where outreach and education efforts should be improved.

**Home Mortgage Disclosure Data - 2001**  
**Home Purchase Loan Statistics by Census Tract**  
**Report Date: 05/20/2002**

Census Tract	Loans Processed	Loans Originated	Approved, Not Accepted	Denied	% Denied	Withdrawn	Closed for Incompleteness
1401	21	14	-	3	14.3%	3	1
1402	10	6	2	2	20.0%	-	-
1403	33	12	6	13	39.4%	1	1
1404	55	40	4	10	18.2%	1	-
1405	53	27	5	17	32.1%	4	-
1406	63	28	9	15	23.8%	9	2
1407	27	16	2	4	14.8%	2	3
1408	42	27	3	7	16.6%	4	1
1409	97	46	14	20	20.6%	16	1
1410	71	51	8	3	4.2%	6	3
1411	55	37	3	11	20.0%	4	-
1412	117	80	7	21	17.9%	9	-
1413	34	23	3	3	8.8%	2	3
1414	87	53	13	17	19.5%	2	2
1415	116	53	15	34	29.3%	11	3
1416	53	27	9	10	18.8%	7	-
1417	3	-	2	-	-	1	-
1418	44	36	2	5	11.3%	1	-
1419	106	78	7	15	14.1%	3	3
1420	55	46	6	2	3.6%	1	-
1421	17	9	1	6	35.3%	-	1
1422	24	14	2	6	25.0%	2	-
1423	96	64	11	14	14.6%	5	2
1424	94	57	12	19	20.2%	6	-
1425	96	54	7	25	26.0%	9	1
1426.01	143	82	9	38	26.6%	10	4
1426.02	136	90	12	18	13.2%	13	3
1427	118	73	11	25	21.1%	8	1
1428	144	98	12	19	13.2%	10	5

Source: Federal Financial Institutions Examination Council (FFIEC).

The Federal Financial Institutions Examination Council also publishes data on the disposition of applications by race of applicant and type of loan. The data for conventional home-purchase loans, 1 to 4 family homes for 2001 is summarized in the table below. Based upon the figures presented, Blacks and Hispanics are underrepresented in regards to conventional home purchase loan applications. Whereas according to the 2000 Census, Blacks comprised 13.1% of the population within the New Haven-Meriden, CT MSA only 6.1% of the applications received were received by

applicants identifying their race as Black. For Hispanics, in 2000, Hispanics comprised 9.8% of the population in the MSA but only 4.6% of the applications received were from identified Hispanic applicants. Although there is no direct explanation as to why there is an under-representation of applications from Blacks and Hispanics it can be assumed that increased outreach to the minority community in terms of financial lending and home ownership options would be beneficial.

Data specific to the City of New Haven is not available. It can be assumed however that the need for increased outreach to minorities is the same in the City as in the MSA.

**Disposition of Applications for Conventional Home-Purchase Loans, 1 to 4 Family Homes  
By Income & Race: 2001  
New Haven-Meriden, CT MSA**

	Less than 50% of MSA Median	50-79% of MSA Median	80-99% of MSA Median	100-119% of MSA Median	120% or more of MSA Median	All Applications Received	% of All Applications Received
American Indian/ Alaskan Native	5	7	4	2	5	23	0.2%
Asian/Pacific Islander	6	27	27	36	137	233	2.5%
Black	98	228	84	55	95	560	6.1%
Hispanic	54	163	65	59	82	423	4.6%
White	405	1,380	916	806	2,709	6,216	67.2%
Other	8	20	16	17	38	99	1.1%
Joint (White/Minority)	1	15	24	19	62	121	1.3%
Race Not Available	118	371	232	196	660	1,577	17.0%
<b>Total</b>	<b>695</b>	<b>2,211</b>	<b>1,368</b>	<b>1,190</b>	<b>3,788</b>	<b>9,252</b>	<b>100.0%</b>

Source: Federal Financial Institutions Examination Council (FFIEC).

## **D. Public and Private Sector**

### **1. Fair Housing Enforcement**

The City of New Haven Commission on Equal Opportunities (CEO) Fair Housing Program provides discrimination complaint processing, educational outreach and supportive program and referrals to New Haven residents and other affected by potential discriminatory actions. The CEO Fair Housing Program has taken an aggressive approach towards educating community agencies, social and political leaders, and community residents on the issues of fair housing. Activities to promote and enforce fair housing by the Fair Housing Program Assistant include the following:

- In collaboration with CEO staff, held a training workshop for the city of New Haven Departments' Heads and the New Haven Board of Aldermen.
- Also in collaboration with CEO staff, held a CEO Day of Diversity Open House for the city residents.
- Distributed over 500 copies of fair housing outreach packages as well as pamphlets, brochures citywide in English and Spanish.
- Issue letters to promote fair housing to various community agencies and churches.
- Provided public service announcements for Citizens Public Television and local Radio Stations.
- Hold public information sessions in the New Haven Chapel Mall.
- Attend the Mayor's Night Out to promote fair housing to the neighborhood residents.
- Promote fair housing by participating in the Neighborhood Management and Teams Meetings. These are held at the New Haven Police Substations throughout various parts of the city.
- Insures continued advertisement of Housing Discrimination Laws and practice to the public.
- Address concerns of discrimination with groups and individuals at various places throughout the city.
- Created a manual entitled "A Guide to Fair Housing For Landlords and Tenants".
- Established a referral guide for equal housing opportunities in New Haven.

## **2. Informational Programs**

As outlined in the previous section, the Commission on Equal Opportunities holds numerous informational and educational programs throughout the year. In addition, pamphlets, brochures and posters are distributed in both English and Spanish. Articles and advertisements in the printed media as well as public service announcements on radio and television are some of the tools used for community outreach. Copies of sample informational materials are included as Appendix B.

In addition to the programs offered by the CEO, LCI, in association with non-profit housing providers and local community development corporations, offer homeownership seminars. These seminars cover a wide range of topics including fair housing issues. Various non-profit and legal rights advocacy groups exist within the City whose sole purpose is to ensure equal housing opportunities for all.

The Department of Services for Persons with Disabilities and the Commission on Disabilities advocate the rights of the disability community inclusive of housing rights. Although the housing rights of the disability community are not often cited in fair housing discussion they have been openly discussed and challenged in New Haven. This advocacy has led to changes in policy and practice for the provision of housing choice.

## **E. Fair Housing Programs and Outreach Efforts**

Pursuant to the settlement agreement of **Christian Community Action, Inc v. City of New Haven** approved in the United States District Court for the District of Connecticut on July 1, 1999, the City of New Haven through the Livable City Initiative undertook various Fair Housing Programs and Outreach Efforts including Fair Housing Audit Testing and Mobility Counseling Programs. The City was also required to undertake a Fair Housing Planning process.

The Fair Housing Audit Testing and Mobility Counseling Programs were implemented for the first time during the 2000-2001 Program Year. As part of the Settlement Agreement, the City was also required to develop a regional plan and approach to address fair housing. During the 2001-2002 Program Year the Livable City Initiative (LCI) Bureau worked with a consultant to analyze local and regional issues associated with affordable housing and fair housing choice and has begun regional outreach with surrounding municipalities, the regional council of governments and housing providers. These efforts are described in the following narrative.

### **Fair Housing Audit Testing**

The City of New Haven, through The Livable City Initiative Bureau is dedicated to the creation of racially and economically integrated communities, neighborhood diversity and the elimination of discriminatory housing practices. The objective of the Fair Housing Audit Testing program is to carry out audits, tests, and other investigative activities which:

- Determine compliance with fair housing requirements in the rental and purchase real estate markets;
- Discover and propose remedial action in the public and private real estate market;
- Propose and undertake activities to detect and remedy more subtle and sophisticated forms of discriminatory practices; and
- Reduce the incidence of steering and other practices perpetuating segregation.

The Fair Housing Audit Testing Program officially began in 2000. The City of New Haven conducted its second year of the Audit Testing program during the Program Year 2001-2002. The primary focus of this project was a fair housing audit-based rental and sales testing in the Greater New Haven area. The Connecticut Fair Housing Center conducted fifty-two (52) paired, audit-based rental and sales tests in at least seven cities and towns in the Greater New Haven area, with primary focus on rental testing. Twenty-one (21) were for source of income, twenty (20) were for race discrimination, and ten (10) were for tests based on family status.

The Center conducted ongoing tester recruitment and training for rental and sales testing. The Center also conducted periodic reviews of its testing program and training materials to ensure ongoing adequacy and effectiveness of the program. The Center staff provided initial intake and screening of complaints, preliminary investigation and testing as accordingly.

Education and outreach was conducted in the Greater New Haven area:

- 1) for individuals who are likely targets of discrimination to provide education about fair housing rights and the Fair Housing Act and the Center's services;
- 2) for the general public to provide education regarding the benefits of residential integration; and
- 3) for landlords and real estate agents to provide education regarding fair housing obligations and the perils of continued discrimination.

The Center distributed educational materials on fair housing issues to social services agencies and community groups throughout the Greater New Haven area, and provided training to these organizations. The Center will mail quarterly newsletters to housing professionals and activists to highlight fair housing initiatives.

### **Mobility Counseling Program**

The objective of the Mobility Counseling program is to:

- Promote residential opportunities for low income City of New Haven residents,

including but not limited to, Section 8 certificate and voucher holders, through landlord outreach, counseling of subsidy holders, and housing search assistance.

- Operate for the primary benefit of persons referred by the relocation office, and other tenants with relocation needs related to City development actions, included but not limited to the Community Development Block Grant and Home Investment Partnerships Program, City sponsored demolition and other demolition programs joined in by the City of New Haven.

Mobility services include:

- Recruitment of a diverse group of private landlords to the program. The program will engage in outreach and establishment of relationships with owners and managers of rental properties in the Greater New Haven area that are outside areas of minority concentration;
- Assistance with applications, credit checks, community tours, rental listings, transportation of clients for the purpose of applying for housing, assistance with social services, day care and job referral, and follow up visits and regular telephone contacts with families eligible or placed under the program.
- Provide counseling and referrals for persons alleging discrimination and report all violations or potential violations of the Fair Housing Act or other housing related federal, state, or local civil rights requirements to the proper authorities.

The Regional Mobility and Tenant Counseling Program officially began in September 2000. As outlined above, the counseling program was established to offer individualized mobility counseling to all families. The primary goal of the program is to provide families with housing choice outside areas of high minority and poverty concentrations.

The definition of Areas of Minority Concentration (AMC), according to the settlement agreement of **Christian Community Action, Inc v. City of New Haven**, is a block group with a percentage of persons other than White non-Hispanic that is twenty percentage points higher than the MSA

percentage. Appendix B contains an analysis of Areas of Minority Concentration in South Central Connecticut as prepared by Holt, Wexler & Farnam, LLP for the City of New Haven in connection with a Study of Housing Trends in South Central Connecticut dated September 2002. According to this analysis, the minority percentage for the New Haven- Meriden PMSA is 27.04% using 2000 Census figures. Therefore, an Area of Minority Concentration is any Block Group with more than 47.04% of its population being minority persons or persons other than White non-Hispanic. As shown by the map in Appendix B, only a few block groups in New Haven are considered to be outside an Area of Minority Concentration.

The Regional Mobility and Tenant Counseling Program promotes regional housing opportunities by providing individualized counseling to families facing moves to new homes. Families served by the program are primarily referred by the City due to displacement or relocation through City activities (e.g. code enforcement). Families served by the program may come from any of the following groups:

1. Families not displaced by a City activity but who otherwise seek help from the City in finding apartments;
2. Families who formerly resided in high-poverty areas who currently reside in low poverty areas and are facing the possibility of having to return to high-poverty areas;
3. Families receiving Section 8 assistance who are about to search for new homes.

### ***Overall Program Goals for Mobility Counseling***

Regional Mobility: To offer individualized mobility counseling to all families referred by the City of New Haven, and to attempt to place all families in non impacted areas.

Relocation: To assist, as requested, the City of New Haven in Uniform Relocation Act-related activities in connection with families referred for mobility counseling.

Tenant Counseling: To assist at minimum 100 families per year with general housing matters as defined by the families themselves.

***Tasks and Sub-Tasks for Mobility Counseling***

- Confirm list of eligible areas outside of minority concentration;
- Identify rental units and property owners within eligible areas;
- Recruit landlords for program participation;
- Prepare and maintain list of participating properties and owners;
- Prepare “intake” brochure for use by program participants;
- Prepare training materials for residents on:
  - Mobility program
  - Basic and special rules of Section 8 and
  - Fair housing laws;
- Conduct outreach to churches, housing agencies, etc. to advise on availability of tenant counseling program;
- Determine individual action plan for each participant;
- Make referrals of potential homes to participants;
- Provide ongoing technical assistance to residents and landlords with respect to City program, Section 8, RAP, relocation procedures, etc.;
- Encourage/provide mechanism for residents to report, or directly report, apparent fair housing violations; and
- Monitor rental real estate market in eligible areas

### Summary of Referral and Services from July 2001 to June 2002

Category of Service	Cumulative for Program Year
Number of units identified for referral	170
Landlords contacted for participation in Program	38
Clients referred for service	98
Clients for whom intake was completed	72
Number of clients receiving mobility counseling	80
Number of clients receiving tenant counseling (non-mobility)	129
Number of home referrals made	245
Number of clients placed	14
Number of clients placed in non-impacted areas	1

#### **Fair Housing Planning**

In early September 2001 the City's Livable City Initiative published a request for proposals for consultants to assist them with the Fair Housing Planning Process. In early 2002, the City hired a Fair Housing Consultant to provide the following services in two phases. **Phase I** services require the consultant to conduct research which would result in the preparation and distribution of two reports: *An Analysis of the New Haven Region's Housing Trends and Policies* and *New Haven Home Ownership Planning and Policy*. These reports are designed to inform the discussions and decision-making of the second phase. **Phase II**, includes the development of a City Fair Housing Plan and active participation in the regional housing planning process called for in the Regional Plan of Development adopted by the South Central Regional Council of Governments.

Holt, Wexler and Farnam, LLP has been assisting the City with its Fair Housing Planning efforts. To date, no reports or documents have been released which summarize the analysis undertaken or specific findings. Upon receipt of the Fair Housing Planning reports, summary data and narrative will be included as part of Appendix B.

### **Regional Fair Housing Planning**

The City of New Haven will participate in and support a Regional Housing Choice Task Force that will be convened by the Regional Council of Governments in fulfillment of the recommendations of Vision for the Future, the regional plan of development adopted by the South Central Regional Council of Governments on November 15, 2000. The development of a regional approach to the provision of affordable housing will require significant regional cooperation to develop and implement. A Regional Housing Choice Task Force is in this best position to facilitate regional input.

### **Fair Housing Planning Recommendations**

Any recommendations from the City's local Fair Housing Planning efforts and the South Central Connecticut Regional Council of Governments regional fair housing planning efforts will be incorporated into the City's Analysis of Impediments as appropriate.

**F. Actions Which Can Be Taken To Remedy Discriminatory Conditions**

Through the compilation of data and information for its Analysis of Impediments to Fair Housing Choice, few incidences of discriminatory conditions were uncovered. The major actions which need to occur are those which build upon the City's current programs. Actions to be taken over the next several years, as they relate to fair housing choice include:

- Develop improved recordkeeping system.
- Strive to compile more detailed information on housing issues affecting the City -- including private lending practices.
- Continue to develop new educational and informational outreach programs.
- Improve coordination between the various departments and agencies involved in housing issues and fair housing choice.
- Form a housing task force within the city. This housing task force should include persons who respond to housing needs of the constituents of New Haven. This group should meet on a regular and ongoing basis in order to provide a coordinated and comprehensive approach to the housing needs of persons in New Haven as well as to ensure that Fair Housing Choices are being addressed. At a minimum, representation should include: the Livable City Initiative, the Fair Rent Commission, the Dept. of Services for Persons with Disabilities, a Community Services Representative, a Mayor's Advocate, a representative from Elderly Services, a representative from the Economic Development and the Housing Authority.
- Develop a local Fair Housing Plan based upon the results of the Fair Housing Planning Process spearheaded by the City in response to the **Christian Community Action, Inc v. City of New Haven** settlement agreement approved in the United States District Court for the District of Connecticut on July 1, 1999.
- Actively participate in the Regional Fair Housing Planning process to be undertaken by the South Central Connecticut Regional Council of Governments. Such efforts will help to develop a regional approach to addressing the issues of fair housing and the need for affordable and supportive housing.

- Continue to pursue regional solutions to relieve the City from the conditions associated with providing the majority of assisted housing and public, social and health service programs in the region.
- Encourage improved means of transportation to provide residents with access to a larger employment region.
- Increase employment opportunities within the City particularly for minorities and other protected classes.
- Continue to encourage homeownership within City neighborhoods to provide both diversity and community stabilization.
- Work to improve the City's image as a place to live as encouragement for families to remain in or return to the City.
- Work to address the housing needs of the disability community.
- Address the Housing Needs of the Disability Community by developing an accurate listing of accessible and adaptable housing units available in the city, participating on the Commission on Regionalism and receiving regular updates and opportunity for participation in these efforts.
- Coordinate with Building Department permit efforts to ensure that the Department of Services for Persons with Disabilities knows about current housing projects.
- Development an accurate listing of accessible and adaptable housing units available in the City, especially within developments and projects assisted with federal, state and local funding. This listing should build upon the existing Housing Authority inventory listing.
- Encourage the creation of more accessible and adaptable housing units.
- Before federal funding is given for housing related projects, coordination with the Department of Services for Persons with Disabilities should occur to ensure that Rehabilitation Act 504 is being implemented.
- The Department of Services for Persons with Disabilities will work closely with the Housing Authority of New Haven and other city departments in order to encourage landlords to make accessibility modifications.
- Given the fact that persons with disabilities is the largest minority in the US, the Regional

Workforce Development Board should have a representative on it's board from the City of New Haven who represents the interests of the Disability Community. A representative from the Dept. of Services for Persons with Disabilities should be invited to serve on the Regional Workforce Development Board.

- Provide housing search assistance resources to help families access housing opportunities in lower poverty neighborhoods of New Haven and its surrounding communities.
- Encourage the development of *permanent* supportive housing options.
- Reduce the incidence of homelessness through preventive measures, including supportive housing services to help currently housed persons maintain their housing.
- Increase the level of services, particularly mental health services, both for persons who are homeless and persons who are currently housed, in order to increase their capacity to access and maintain permanent housing.
- Conduct research to identify the mental health problems of residents, including “lower level” mental health problems such as depression that are too frequently unrecognized and untreated, and develop more effective service provision to help New Haven’s families access and maintain appropriate housing.

**V. ASSESSMENT OF CURRENT PUBLIC  
AND PRIVATE FAIR HOUSING  
PROGRAMS AND ACTIVITIES**

## **V. ASSESSMENT OF CURRENT PUBLIC AND PRIVATE FAIR HOUSING PROGRAMS AND ACTIVITIES**

The City of New Haven is committed to the provision of fair housing choice as evidenced by the numerous programs and activities it supports. As testament to its commitment, the City was one of the first in the nation to create a Commission on Equal Opportunities in 1964 followed by a Fair Housing Program in 1978. Current Fair Housing programs and activities undertaken within the City by its various departments, agencies, non-profits and advocacy groups exceed those offered by most other communities. Enhancement of these programs coupled with the creation of new activities and techniques meet the objectives of affirmatively furthering fair housing choice.

## **VI. CONCLUSION**

## **VI. CONCLUSION**

The City of New Haven has determined through its Analysis of Impediments to Fair Housing Choice that it is in compliance with requirements to affirmatively further fair housing. A continuation of existing programs and the development of new methods to improve housing choice will ensure continued compliance with the requirements embodied in Section 808(e)(5) of the Fair Housing Act and the regulatory requirements of the CDBG, HOME, ESG and HOPWA programs. Improvements to the City's Fair Housing Program will be made as needed in response to improved outreach and education, regional coordination and planning activities, and public input and criticism. The Analysis to Impediments supporting documentation will be kept current to ensure continued compliance and improvement.

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Signature of CEO

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Date

**APPENDIX A**  
**FAIR HOUSING MATERIAL**

**APPENDIX B**  
**FAIR HOUSING PLANNING**  
**DOCUMENTS**