

2015

Regional Analysis of Impediments to Fair Housing for Montgomery County and the Cities of Dayton and Kettering, OH

Appendix C — Scope of Services

*This PDF contains only a section of the AI.
For the other sections or the entire AI,
go to <http://www.mvfairhousing.com/ai2015>.*



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Appendix C — Scope of Services

The Miami Valley Fair Housing Center (MVFHC) proposed the following scope of services in its May 2014 bid to Montgomery County, the City of Dayton, and the City of Kettering to do their Analysis of Impediments:

Project Approach and Methodology

The Miami Valley Fair Housing Center (MVFHC) will utilize a comprehensive methodology that will include:

- Conducting thorough reviews of pertinent data, including but not limited to statistical information and public policies and practices;
- Analyzing data, including the creation of tables and illustrations to highlight significant factors or trends;
- Public Hearings or Focus Groups to learn what members of the general public view as significant housing issues; and
- Conducting structured interviews of individuals and organizations representing a variety of viewpoints, including governmental employees, non-profit community service providers, and professionals in the housing industry that are pivotal in the implementation of fair housing and affordable housing, as well as those individuals or organizations suggested by each jurisdiction.

All data sources that will be utilized in the analysis will be credible sources of information, such as the U.S Census Bureau, and as close to the original source of information as feasible.

Project Scope and Deliverables

In completing the Analysis of Impediments to Fair Housing MVFHC will examine the following areas of each municipality (Montgomery County, OH; the City of Dayton, OH and the City of Kettering, OH):

- The planning, zoning, public transportation, access to amenities and services and the practices of the Dayton Metropolitan Housing Authority;
- Population demographics, such as race, age, the presence of children or disability within a household, and population migration patterns;
- Economic climate, including employment issues, income and poverty;
- Housing data, such as the available private and public housing stock, affordability, housing for persons with disabilities, real estate sales, as well as lending, property appraisal and foreclosure occurrence;

- Barriers to affordable housing, including the impact of such organizations as County Corp, CityWide Development, and other Community Development Corporations in reducing such barriers;
- Existing or prior fair housing activities, including an assessment of the impact of these prior activities upon fair housing impediments identified in 2010; and
- Current impediments to fair housing, along with suggested methods to address such impediments.

In addition, MVFHC will use its unique role as the only private, non-profit fair housing organization in the Miami Valley to add a special testing component to the Scope of Services for this AI. This component will identify issues relevant to how the various housing markets in Montgomery County, the City of Dayton and the City of Kettering function in relation to one another. This is in line with HUD's *Fair Housing Planning Guide* which promotes testing as a good way to round out a comprehensive analysis of impediments.¹ The following details this segment of the Scope of Services.

Testing for Housing Discrimination

Housing discrimination is rarely a transparent activity. Frequently the only way in which it can be detected is through fair housing testing. Testing uses individuals to simulate a housing search experience and gather objective information that allows comparison of the treatment of individuals as well as a review of the statements, policies, and practices of housing providers. Testing as a way to uncover housing discrimination has been approved by the U.S. Supreme Court. Testing can be used for enforcement purposes, or to take a snapshot of the market at a given time. The methodology is the same. MVFHC is already providing testing services within Montgomery County and the City of Kettering, and will be able to report on these existing testing activities and provide insight on the impact of the testing results and its impact upon the impediments to fair housing choice within Montgomery County and the City of Kettering.

MVFHC currently provides fair housing testing services within all three jurisdictions that are participating in the regional approach to the AI. This too uniquely positions MVFHC to be able to conduct a series of housing discrimination tests examining various issues and basis of potential housing discrimination.

Montgomery County currently contracts through its CDBG program for MVFHC to conduct "thirty-six random tests" per fiscal year. Montgomery County Community Development officials have agreed that for the purposes of including random testing from Montgomery County as part of the AI, the same tests that MVFHC conducts under the

CDBG contract, will be utilized and analyzed and reported upon in the AI. Given the time frame of the AI, this will mean that a portion of the tests from MVFHC's 2013-2014 CDBG contract, as well as a portion of the tests from MVFHC's 2014-2015 CDBG contract, will be used for the AI.

The City of Kettering currently contracts through its CDBG program for MVFHC to conduct "an average of two (2) random tests per month" per fiscal year. Kettering Community Development officials have agreed that for the purposes of including random testing from the City of Kettering as part of the AI, the same tests that MVFHC conducts under the CDBG contract, will be utilized and analyzed and reported upon in the AI. Given the time frame of the AI, this will mean that a portion of the tests from MVFHC's 2014 CDBG contract, as well as a portion of the tests from MVFHC's 2015 CDBG contract, will be used for the AI.

The City of Dayton currently contracts for MVFHC to conduct a certain number of random tests in the City of Dayton, through various contracts for service. Dayton HRC's Executive Director has agreed that for the purposes of including random testing from the City of Dayton as part of the AI, the some of the same tests that MVFHC conducts under the existing contracts or the FHAP partnership contract, will be utilized and analyzed and reported upon in the AI. Testing in the City of Dayton will be done with a focus on persons with felonies, communities with high concentrations of single parent female headed households, immigrant and refugee populations, and the Lesbian, Gay, Bisexual, and Transgender community.

From its examination, MVFHC will create a thoroughly documented and well-organized analysis, providing detailed and essential information regarding the current state of fair housing and affordable housing within Montgomery County, specifically identifying issues relevant to the City of Dayton and the City of Kettering, and what remains to be done in order to make fair housing a reality for all regardless of race, color, national origin, religion, gender, familial status or disability. MVFHC will also examine the additional protected classes of sexual orientation and gender identity or expression within the City of Dayton. The analysis will contain a table of contents, executive summary, and figures, maps and tables to illustrate significant factors or trends.

Project Schedule and Timing

Considering the population size, area covered, and the role of each jurisdiction within Montgomery County, MVFHC anticipates a minimum of 2,125 work hours in research, testing, and analysis, drafting and finalizing the comprehensive analysis. The MVFHC

estimates 365 calendar days to complete the project. In order to meet a completion date of June 30, 2015, in combination with existing and projected workload; MVFHC would need to be under contract to begin work on the project by July 1, 2014.

Potential Services Requested from Montgomery County, the City of Dayton, and the City of Kettering

In completing the project, MVFHC will request, from each jurisdiction, access to and/or copies of such information as: the Consolidated Annual Performance Report (CAPR), the Zoning Map and Zoning Code, Long Range Planning or Comprehensive Land Use Plan, and other pertinent data from the following:

- Montgomery County's Departments of Community & Economic Development, County Corp, and Family & Children First Council;
- The City of Dayton's Departments of Building Services, Economic Development, Human Relations Council, Law, and Planning and Community Development;
- The City of Kettering's Departments of Building & Zoning, Economic Development, Housing Opportunities, Law, and Planning & Development.

MVFHC also anticipates requesting interviews with various elected officials from each jurisdiction and several key staff members from each jurisdiction.

¹ Chapter 4: Requirements and Guidelines for Entitlement Jurisdictions, 4-10. *Fair Housing Planning Guide* (vol. 1). U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity. Retrieved from <http://www.hud.gov/offices/fheo/images/fhpg.pdf>.