

# 2010 Regional Fair Housing Plan

for

Montgomery County, OH

The City of Dayton, OH

The City of Kettering, OH

March 2010



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## Introduction

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The U.S. Department of Housing and Urban Development (HUD) provides Federal funding to Montgomery County (hereinafter “the County”), the City of Dayton (hereinafter “Dayton”), and the City of Kettering (hereinafter “Kettering”) for their housing and community development programs through the Community Development Block Grant (CDBG) and the HOME Investment Partnership Program. The County, Dayton and Kettering then grant most of these funds to providers of services or housing benefiting low- and moderate-income persons. As a prerequisite to receiving these federal funds, entitlement communities, including the County, Dayton, and Kettering, must affirmatively further fair housing, which, in the context of Fair Housing Planning, means that these three local jurisdictions must prepare an analysis of impediments to fair housing, a plan to address these impediments, and maintain records of their fair housing activities. Collectively, this is known as a Fair Housing Action Plan, which becomes a part of each jurisdiction’s Consolidated Plan.

## Fair Housing

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Fair housing means residents having the choice to live where they want and where they can afford without the fear or threat of discrimination. Discrimination, in this context, is any housing practice or action that is unlawful under Title VIII of the Civil Rights Act of 1968, as amended. Title VIII, commonly referred to as the Fair Housing Act, specifically provides that “...no person shall be subjected to discrimination because of race, color, religion, sex, handicap, familial status, or national origin in the sale, rental, or advertising of dwellings, in the provision of brokerage services, or in the availability of other residential real estate-related transactions.”

## Commitment to Fair Housing

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The County, Dayton and Kettering are each committed to affirmatively furthering fair housing and to adopting a fair housing action plan, which supports their Consolidated Plans. The **2010 Regional Fair Housing Action Plan for Montgomery County, the City of Dayton, and the City of Kettering, Ohio** enhances and furthers equal opportunity in housing to all of the residents within the three jurisdictions, enabling residents to more readily seek, obtain, use and enjoy the housing that exists within the Miami Valley region. With this in mind, the plan adopts the programmatic objectives laid out in the opening of HUD’s 1996 publication “Fair Housing Planning Guide,” which gives guidance on this process:

The Department of Housing and Urban Development is committed to eliminating racial and ethnic segregation, illegal physical and other barriers to persons with disabilities and other discriminatory practices in housing. Additionally, the Department will use all of its programmatic and enforcement tools to achieve this goal. The fundamental goal of HUD’s fair housing policy is to make housing choice a reality through Fair Housing Planning (FHP).

## Analysis of Impediments to Fair Housing

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The Analysis of Impediments to Fair Housing is the first step in developing a fair housing plan. The 2009 Analysis of Impediments for Montgomery County, the City of Dayton, and the City of Kettering, Ohio<sup>i</sup> disclosed a number of impediments that this Fair Housing Action Plan addresses with Action Tasks and Goals.

## 2010 Fair Housing Action Work Plan

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### Impediment 1: Racial segregation or racial clustering still exists.

#### 1A. Provision of Fair Housing Education and Enforcement Services

##### Action to be Taken:

The County and Kettering will contract for fair housing education and enforcement services with the Miami Valley Fair Housing Center, Inc., (hereinafter “MVFHC”). Dayton will contract for fair housing testing with MVFHC. Dayton’s Human Relations Council (hereinafter “HRC”) staff will handle enforcement services (other than testing) in Dayton; and will complete an update, currently in process, on its brochure for use at outreach and education events.

##### Action Time Frame/Goals:

The County and Kettering will each renew its agreement with MVFHC for the education and enforcement services for the year starting Jan 1, 2010. Dayton’s contract for testing services with MVFHC will be executed by July 1, 2010. Annual renewals will occur during the term of the Consolidated Plan. The goals of this action are to reduce racial segregation and racial steering and to promote racial integration in housing.

##### Responsible Entity/Resources:

Staff from the Community Development Departments of the County and Kettering and from HRC, or their designees, will implement these activities. Resources for these activities include, funding such as CDBG, private funding and other local and federal sources of funds designated for fair housing and fair lending activities.

##### Monitoring Method/Documentation:

- Attachment 1 – *Work Program from the Agreement for Delegation of Activities* between the County and MVFHC and Attachment 2 – *Work Program from the Agreement* between Kettering and MVFHC confirm the agreements for the provision of fair housing education and enforcement services between the County and Kettering with MVFHC. In subsequent years, similar documentation will be attached to the Fair Housing Action Plan annual review to substantiate the continuation of education and enforcement services between MVFHC, the County and Kettering.
- Attachment 3 – *Scope of Services from the Agreement* confirms a contract for fair housing testing services between Dayton and MVFHC. In future years, Dayton will also submit

documentation to substantiate continued testing as a part of the annual review. HRC will annually report on its education activities, some of which will be in collaboration with MVFHC.

## **1B. Broad Fair Housing Educational Services with the provision of Spanish language materials**

### Action to be Taken:

All three jurisdictions will support fair housing and fair lending education at outreach events that feature cultures with languages other than English with a focus on distribution of Spanish language materials including:

- MVFHC will use its Spanish language materials in its provision of services within the County and Kettering.
- Dayton is creating a new brochure that explains the fair housing services of the Human Relations Council. When the new fair housing services brochure is complete, HRC will work with MVFHC to collaborate on resources to translate it into Spanish.
- The County, Dayton and Kettering will implement ASL and foreign language interpreters in their provision of fair housing services.

### Action Time Frame/Goals:

This will commence in 2010 as an ongoing task over the term of the Consolidated Plan for the three jurisdictions with two goals:

- To increase the number of residents who speak English as a second language and know how to file a housing discrimination complaint.
- This goal will be accomplished through the participation of the three jurisdictions and their representatives in at least one (1) Spanish/Latino/Caribbean cultural event in the metropolitan area annually, and,
- Increase the number of residents who know how to file a housing discrimination complaint. This goal will be measured by a 2010 baseline that tracks the number of complaints from residents whose complaints allege national origin discrimination within the three jurisdictions.

### Responsible Entity/Resources:

Staff from the Community Development Departments of the County and Kettering and from HRC, or their designees, will implement these activities. Resources for these activities include funding such as CDBG, private funding and other local and federal sources of funds designated for fair housing and fair lending activities.

### Monitoring Method/Documentation:

Each jurisdiction (or their designee) will collect and report on these tasks quarterly. A summary of this quarterly monitoring will form the basis for reporting in the annual review.

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## **Impediment 2: Disparities still exist for minorities when trying to obtain a home loan, but particularly for black or African American loan applicants.**

### **2A. Lender Education and Outreach**

#### Action to be Taken:

Staff from all three jurisdictions will meet regularly with representatives from local lending institutions including, but not limited to: Key Bank, Huntington Bank, PNC Bank, Fifth Third Bank, Liberty Bank, and US Bank.

#### Action Time Frame/Goals:

This will commence by May 2010 and will continue as an ongoing task over the term of the Consolidated Plan for the three jurisdictions with a goal to meet semi-annually with lenders to discuss strategies to promote homeownership and financial literacy, particularly in minority and historically underserved communities.

#### Responsible Entity/Resources:

Staff from the Community Development Departments of the County and Kettering and from HRC, or their designees, will implement these activities. Resources for these activities include funding such as CDBG, private funding and other local and federal sources of funds designated for fair housing and fair lending activities.

#### Monitoring Method/Documentation:

Each jurisdiction will collect and report on these tasks quarterly. Staff from the County, Dayton, and Kettering will secure letters of support for this type of dialogue from local financial institutions annually and provide copies of said support letters during the annual review.

### **2B. Quality Homeownership Education**

#### Action to be taken:

All three jurisdictions will refer to and work with community organizations that present fair housing and fair lending education as part of the provision of counseling or homebuyer education programs and encourage the development of homebuyer education programs in Spanish and other languages as appropriate.

#### Action Time Frame/Goals:

This will commence by June 2010 and continue as an ongoing task over the term of the Consolidated Plan for the three jurisdictions with goal to promote quality homeownership education and to support increased stable homeownership for all residents.

#### Responsible Entity/Resources:

Staff from the Community Development Departments of the County and Kettering and from HRC, or their designees, will implement these activities. Resources for these activities include funding such as CDBG, private funding and other local and federal sources of funds designated for fair housing and fair lending activities.

#### Monitoring Method/Documentation:

Each jurisdiction will collect and report on these tasks quarterly. A summary of this quarterly monitoring will form the basis for reporting in the annual review.

- Each jurisdiction will require the community organizations that provide homebuyer education to include fair housing and fair lending education components as part of their homebuyer education courses, including instruction and materials in Spanish and other languages as appropriate.
- Each jurisdiction will require the community organizations that provide homebuyer education to submit their fair housing and fair lending education materials and methodology to MVFHC for review and update.
- Attachments 1 and 2 confirm the provisioning of fair housing education and enforcement services for the County and Kettering by MVFHC, including the provision to educate consumers about the warning signs of predatory lending.

## **2C. Use HMDA data as an educational tool for consumers and lenders to advocate for fair lending practices.**

#### Action to be Taken:

All three jurisdictions will sign a memorandum of understanding to support the annual collection and analysis of HMDA data for the region. The jurisdictions will jointly distribute HMDA data analyses to local lenders, public officials, and the public.

#### Action Time Frame/Goals:

This will commence by August 2010 and continue as an ongoing task over the term of the Consolidated Plan with the goal of incorporating HMDA data as an essential component in future community and economic development in each jurisdiction.

#### Responsible Entity/Resources:

Staff from the Community Development Departments of the County and Kettering and from HRC, or their designees, will implement these activities. Resources for these activities include funding such as CDBG, private funding and other local and federal sources of funds designated for fair housing and fair lending education and outreach to housing consumers.

#### Monitoring Method/Documentation:

Each jurisdiction will collect and report on these tasks quarterly. A summary of this quarterly monitoring will form the basis for reporting in the annual review.

- Attachment 4 - *Memorandum of Understanding* - confirms the understanding between the County, Kettering and Dayton to collect, analyze and disseminate HMDA data annually during the term of the Consolidated Plan.

## **2D. Lending Enforcement Activities**

#### Action to be Taken:

The three jurisdictions will fund and work to identify additional funding resources for ongoing testing and periodic studies to determine the extent and severity of discriminatory lending practices in the region. The three jurisdictions will support and advocate for public policies that support full-application lending testing for home mortgages.

Action Time Frame/Goals:

This will commence by September 2010 as the initial task of developing an ongoing fair lending testing program over the term of the Consolidated Plan with goal of enforcing existing laws to protect against unfair lending practices.

Responsible Entity/Resources:

Staff from the Community Development Departments of the County and Kettering and from HRC, or their designees, will implement these activities. Resources for these activities include funding such as CDBG, private funding and other local and federal sources of funds designated for fair housing and fair lending enforcement activities.

Monitoring Method/Documentation:

Each jurisdiction will collect and report on these tasks quarterly. A summary of this quarterly monitoring will form the basis for reporting in the annual review.

- Attachments 1 and 2 confirm the agreements for the provision of fair housing testing services between the County and Kettering with MVFHC. In subsequent years, similar documentation will be attached to the Fair Housing Action Plan annual review to substantiate the continuation of testing services between MVFHC, the County and Kettering.
- Attachment 3 confirms a contract for testing services between Dayton and MVFHC. In future years, Dayton will also submit documentation to substantiate continued testing as a part of the annual review.

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### **Impediment 3: Housing discrimination still exists.**

#### **3A. Provision of comprehensive fair housing education services to public**

Action to be Taken:

Provide education and resources on fair housing issues in public and private forums, including, but not limited to: The Dayton Area Board of Realtors®, The Greater Dayton Apartment Association, faith-based outreach venues such as the Wesley Community Center and the Dayton Urban Ministries, area high schools, home improvement shows, health fairs, and cultural festivals such as Hispanic Heritage Festival at RiverScape MetroPark in Dayton.

Action Time Frame/Goals:

This will begin by March 2010 and continue as an on-going action for the duration of the Consolidated Plan with the goal of residents having the knowledge of how to file a housing discrimination complaint; as measured by the number of education and outreach presentations made each year, and the number of residents reached through each presentation.

Responsible Entity/Resources:

Staff from the Community Development Departments of the County and Kettering and from HRC, or their designees, will implement these activities. Resources for these activities include funding such as CDBG, private funding and other local and federal sources of funds designated for fair housing and fair lending education activities.

Monitoring Method/Documentation:

Each jurisdiction will collect and report on these tasks quarterly. A summary of this quarterly monitoring will form the basis for reporting in the annual review.

### **3B. Support Enforcement of fair housing laws**

Action to be Taken:

Promote and use existing enforcement mechanisms: Ohio Civil Rights Commission, HUD, HRC, as well as federal, state and local courts to file cases as appropriate.

Action Time Frame/Goals:

This will begin in January 2010 as continue as an on-going action for the duration of the Consolidated Plan with goal of increasing the number of meritorious cases filed by 5% per annum.

Responsible Entity/Resources:

Staff from the Community Development Departments of the County and Kettering and from HRC, or their designees, will implement these activities. Resources for these activities include funding such as CDBG, private funding and other local and federal sources of funds designated for fair housing and fair lending education activities.

Monitoring Method/Documentation:

Each jurisdiction will collect and report on these tasks quarterly. A summary of this quarterly monitoring will form the basis for reporting in the annual review.

- Attachments 1 and 2 confirm the agreements for the provision of fair housing education and enforcement services for the County and Kettering by MVFHC. In subsequent years, similar documentation will be attached to the Fair Housing Action Plan annual review to substantiate the continuation of education and enforcement services between MVFHC, the County and Kettering.
- Attachment 3 confirms a contract for testing services between Dayton and MVFHC. In future years, Dayton will also submit documentation to substantiate continued testing as a part of the annual review.

### **3C. Collaboration and Communication**

Action to be Taken:

MVFHC will meet semi-annually with the members of the HRC Board and its professional staff, and with the Kettering Board of Community Relations and Kettering's Community Development manager to identify areas of cooperation needed and to implement appropriate actions so that the goals of this plan can be met more efficiently.

Action Time Frame/Goals:

This will commence in the first quarter of 2010 and continue as an on-going task for the duration of the Consolidated Plan. Goals will include:

- Gathering and sharing information on fair housing education and enforcement activities in a consistent and comparable manner; and
- Supporting goal 3B. *Support Enforcement of fair housing laws: "increasing the number of meritorious cases filed by 5% per annum" (goal 3b).*

Responsible Entity/Resources:

Staff from the Community Development Departments of the County and Kettering and from HRC, or their designees, will implement these activities. Resources for these activities include funding such as CDBG, private funding and other local and federal sources of funds designated for fair housing and fair lending activities.

Monitoring Method/Documentation:

Each jurisdiction will collect and report on these tasks quarterly. A summary of this quarterly monitoring will form the basis for reporting in the annual review.

### **3D. Continued Contractual Services with MVFHC**

Action to be Taken:

Montgomery County and Kettering will continue their contractual relationships with MVFHC for fair housing enforcement and education services, at or above current levels.

Action Time Frame/Goals:

Each jurisdiction will renew its agreement for the services consistent with the calendar year for services beginning on January 1 of each year and ending on December 31, of each year with goal of supporting this 2010 Regional Fair Housing Plan.

Responsible Entity/Resources:

The County and Kettering use CDBG resources and other local resources for these contracts.

Monitoring Method/Documentation:

Each jurisdiction will collect and report on these tasks quarterly. A summary of this quarterly monitoring will form the basis for reporting in the annual review.

- Attachments 1 and 2 confirm the provisioning of fair housing education and enforcement services for the County and Kettering with MVFHC.

### **3E. Provision of continuing fair housing services in the City of Dayton**

Action to be Taken:

- Support the implementation of the following 5 recommendations originally proposed in the *Analysis of Impediments to Fair Housing and Housing Choice in Dayton Ohio (2004)*:
  - Continue to fund and implement comprehensive fair housing programming consistent with its HUD designation as a “substantially equivalent” jurisdiction;
  - Continue to vigorously enforce ordinances, laws, and other prohibitions against bias and discrimination in housing;
  - Continue to support the Dayton Dialogue on Race and Reconciliation and other initiatives promoting attitudinal and behavioral change that lead to greater understanding and tolerance;
  - Hire a Disability Specialist to work with persons with disabilities and related complaints and initiatives; and
  - Support public and private sector efforts aimed at reducing or eliminating discrimination, racism, sexism, etc.

- Implement re-development of an interactive website to enhance the City of Dayton’s provision of fair housing education and enforcement services to include:
  - On-going postings of current affairs in fair housing
  - A method for requesting fair housing assistance
  - A method for filing a housing discrimination complaint
  - Fair Housing educational materials in English and Spanish
  - Links to fair housing materials from other organizations and resources like OCRC, HUD and MVFHC

Action Time Frame/Goals:

On-going provision of services over the term of the Consolidated Plan with the goal of ensuring that residents should be able to easily find the information to file a complaint with HRC.

Responsible Entity/Resources:

Dayton will use CDBG resources and other local funding for these activities.

Monitoring Method/Documentation:

Dayton will collect and report on these tasks quarterly. A summary of this quarterly monitoring will form the basis for reporting in the annual review.

**Impediment 4: The populations of seniors and persons with disabilities are expected to continue growing through 2030 and the lack of available, accessible homes will grow with these populations**

Action to be Taken:

Each jurisdiction will continue to seek funding to provide for modifications of residential housing units built before March 1991 in order to make them accessible to people with disabilities.

Action Time Frame/Goals:

This will commence in the second quarter of 2010 and continue as an on-going task for the duration of the Consolidated Plan, with the goal of developing laws and/or programs that implement HUD’s “Visitability” recommendations as they relate to the rehabilitation of older structures as well as to programs for new construction.

Responsible Entity/Resources:

Staff from the Community Development Departments of the County and Kettering and from HRC, or their designees, working in conjunction with community partners will implement these activities. Community partners will include, but not be limited to the Access Center for Independent Living, MVFHC, the Kettering Board of Community Relations and HRC. Resources for these activities include funding such as CDBG, private funding and other local and federal sources of funds designated for fair housing and fair lending activities.

Monitoring Method/Documentation:

Each jurisdiction will collect and report on these tasks quarterly. A summary of this quarterly monitoring will form the basis for reporting in the annual review. *See “Visitability in Housing,” Section 5-31 of FHEO’s 1996 “Fair Housing Planning Guide” at <http://www.nls.gov/offices/fheo/images/fhpa.pdf>.*

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**Impediment 5: There exists a lack of available accessible homes; and there are zoning and building codes that do not require the construction or rehabilitation of housing units in compliance with the design and construction requirements of the Fair Housing Act, and these codes exacerbate the problem.**

Actions to be Taken:

Support MVFHC and HRC programs on the issues of accessibility including but not limited to:

- Testing of new construction of multi-family housing for fair housing accessibility design and construction compliance;
- Education of and outreach to design and construction professionals on fair housing accessibility design and construction requirements;
- Continued development of appropriate zoning ordinances, policies, protocols and programs to promote Visitability
- Ongoing education of local elected officials and municipal staff in the County, Dayton and Kettering at all levels about the obligations of recipients of federal funds to affirmatively furthering fair housing, specifically related to accessibility.

Action Time Frame/Goals:

Commencing April 2010 and continuing as an on-going task through the duration of the Consolidated Plan with the goal of increasing accessible housing in the region through:

- Rehabilitating aging residential stock;
- Ensuring through aggressive monitoring and testing that new construction multi-family housing is built in compliance Fair Housing Act accessibility design and construction requirements;
- Amending zoning codes/ordinances to comply with the federal Fair Housing Act, HUD Guidelines and Recommendations.

Responsible Entity/Resources:

Staff from the Community Development Departments of the County and Kettering and from HRC, or their designees, will implement these activities. Resources for these activities are funding such as CDBG, private funding and other local and federal sources of funds designated for fair housing and fair lending activities.

Monitoring Method/Documentation:

Each jurisdiction will collect and report on these tasks quarterly. A summary of this quarterly monitoring will form the basis for reporting in the annual review. *See MVFHC study on zoning ordinances within Montgomery County, Ohio; see also, HUD's Design and Construction Safe Harbor Lists at <http://www.fairhousingfirst.org/faq/safeharbors.html>*

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**Impediment 6: Montgomery County, the City of Dayton, and the City of Kettering do not collect data regarding compliance with Section 804(c) of the Fair Housing Amendments Act from all of the periodical publications distributed in their jurisdictions.**

Action to be Taken:

Semi-annually all three jurisdictions, or their designees, will collect data and investigate suspected discriminatory advertising practices in print and online publications disseminated within the region.

Action Time Frame/Goals:

Commencing in July 2010 and continuing as an on-going task through the duration of the Consolidated Plan with these goals:

- Discourage and/or eliminate discriminatory advertising practices and
- Increase the filing of meritorious fair housing advertising cases in proportion to the discriminatory advertising observed in the region.

Responsible Entity/Resources:

The County and Kettering will continue to contract with MVFHC for this service. HRC, or its designee, will be responsible for implementing this action for Dayton. The resources for this action will be CDBG or other local funds.

Monitoring Method/Documentation:

Each jurisdiction will collect and report on these tasks quarterly. A summary of this quarterly monitoring will form the basis for reporting in the annual review.

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## **Impediment 7: Lack of currently available affordable housing.**

Action to be Taken:

The County, Kettering, and Dayton will seek additional funding and explore regulatory incentives to provide affordable options to underserved populations, including minority populations, low- to moderate-income individuals/families, and people with disabilities and those needing accessible housing.

Action Time Frame/Goals:

This is an on-going task that is being implemented through the Homeless Solutions Policy Board on which all three jurisdictions have a prominent role. Goals for this action include:

- To increase racial integration of the most residentially segregated white neighborhoods in all three jurisdictions.
- To promote racial integration of the most residentially segregated black neighborhoods in all three jurisdictions.
- To increase affordable housing options throughout all three jurisdictions.

Responsible Entity/Resources:

Staff from the Community Development Departments of the County and Kettering and from HRC, or their designees, will implement these activities, in collaboration with the Affordable Housing Options Committee of the Homeless Solutions Policy Board. Resources for these activities are funding such as CDBG, private funding and other local and federal sources of funds designated for the development of these activities.

Monitoring Method/Documentation:

Each jurisdiction will collect and report on these tasks quarterly. A summary of this quarterly monitoring will form the basis for reporting in the annual review. *See 10-Year Plan for Ending Chronic Homelessness and Reducing Overall Homelessness* at: [http://www.mcoho.org/services/fcfc/homeless\\_solutions.html](http://www.mcoho.org/services/fcfc/homeless_solutions.html)

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## **Impediment 8: Foreclosure rates are on the rise.**

### Action to be Taken:

All three jurisdictions and/or their designees will provide educational outreach to residents at risk of foreclosure or who are actually having difficulty making their residential mortgage payments, including resources on how to avoid foreclosure and where residents can seek and obtain foreclosure prevention intervention when foreclosure is imminent.

### Action Time Frame/Goals:

Support and seek additional funding to support residential foreclosure prevention efforts with the goal of reducing residential foreclosures by 10% per annum over the next five years.

### Responsible Entity/Resources:

This action will be implemented by various departments from all three jurisdictions involved in residential real estate transactions, including but not limited to: the County Auditor's office, the County Recorder's office, the County Treasurer's office and staff from the Community Development Departments of the County and Kettering and from HRC. Funding such as CDBG, private funding and other local and federal sources of funds will be used for these activities.

### Monitoring Method/Documentation:

Each jurisdiction will collect and report on these tasks quarterly. A summary of this quarterly monitoring will form the basis for reporting in the annual review.

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## **Additional Observations: Adjunct Barriers to Fair Housing**

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### **Observation 1: Transportation Policy: the area has a lack of affordable public transportation.**

#### Action to be Taken:

The entitlement jurisdictions will work cooperatively to create a regional solution to address the lack of reliable, affordable public transportation by working with the Miami Valley Regional Planning Commission (MVRPC) and The Greater Dayton Regional Transit Authority (RTA).

#### Action Time Frame/Goals:

Commencing in 2010 and continuing for the duration of the Consolidated Plan, all three jurisdictions will broadly educate about the obligation of any recipient of federal funds to affirmatively further fair housing. All three jurisdictions will provide input to MVRPC and RTA about the lack of affordable transportation with goal of influencing these organization's planning processes to meet their obligation to affirmatively further fair housing through the development of a plan that connects decent moderate-to low-income housing to reliable, affordable public transportation.

#### Responsible Entity/Resources:

Staff from the Community Development Departments of the County and Kettering and from HRC, or their designees, will implement these activities.

#### Monitoring Method/Documentation:

Each jurisdiction will collect and report on these tasks quarterly. A summary of this quarterly monitoring will form the basis for reporting in the annual review.

### **Observation 2: Inconsistency in Data Collection, benchmark statistics, measurement of program efficacy: there is a lack of consistent forms for data collection**

#### Action to be Taken:

The three jurisdictions will review data collection systems for analyzing and reporting on fair housing and equal opportunity activities and challenges in the region.

#### Action Time Frame/Goals:

Beginning in the third quarter of 2010 and continuing until consistent data collection and reporting mechanisms are realized, ensure that fair housing and fair lending activities are S.M.A.R.T. (**S**pecific, **M**easurable, **A**ttainable, **R**ealistic, **T**ime-framed) and relevant to HUD regulations, guidelines, and program expectations.

#### Responsible Entity/Resources:

Staff from the Community Development Departments of the County and Kettering and from HRC, or their designees, will implement these activities. Resources for these activities include funding such as CDBG, private funding and other local and federal sources of funds designated for fair housing and fair lending activities.

#### Monitoring Method/Documentation:

Each jurisdiction will collect and report on these tasks quarterly. A summary of this quarterly monitoring will form the basis for reporting in the annual review.

## Monitoring and Evaluation of Fair Housing Action Plan

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The County, Dayton and Kettering will monitor and evaluate the progress made in the implementation of the **2010 Regional Fair Housing Plan for Montgomery County, the City of Dayton, and the City of Kettering, Ohio** and report on the progress and their efforts in their respective Consolidated Annual Performance Evaluation Reports. HUD will also evaluate each jurisdiction's participation in regional efforts to implement this plan's fair housing and fair lending goals.

In order to effectively implement this plan, the jurisdictions also need to develop:

- A matrix or similar tool for tracking progress on each component of the plan over the five year implementation period;
- Appropriate resources to implement some of the strategies laid out in the plan; and
- Additional collaborative partners that can contribute direct, in-kind, and human resources to implementation of the plan.

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## Attachments

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**Attachment 1** – *Work Program from the Agreement for Delegation of Activities* between Montgomery County, OH and Miami Valley Fair Housing Center, Inc., for the provision of comprehensive fair housing services.

**Attachment 2** – *Work Program from the Agreement* between the City of Kettering, OH and Miami Valley Fair Housing Center, Inc., for the provision of comprehensive fair housing services.

**Attachment 3** – *Scope of Services from the Agreement* between the City of Dayton, OH and Miami Valley Fair Housing Center, Inc., for the provision of fair housing testing services.

**Attachment 4** – *Memorandum of Understanding* between Montgomery County, the City of Dayton, OH and the City of Kettering, OH, on the collection, analysis and dissemination of HMDA data.

## Endnotes

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<sup>i</sup> **2009 Montgomery County and Cities of Dayton and Kettering Analysis of Impediments to Fair Housing**  
<http://www.wright.edu/cupa/pdf/2009%20Montgomery%20County%20and%20Cities%20of%20Dayton%20and%20Ketterin%20Analysis%20of%20Impediments%20to%20Fair%20Housing.pdf>

