

**ANALYSIS OF IMPEDIMENTS  
TO  
FAIR HOUSING CHOICE**

**CITY OF NEW HAVEN, CONNECTICUT**

Originally Prepared: 1996  
Updated 2010

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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. It is 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) Undertaking 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 and completed a full update in 2003 to reflect the release of 2000 Census data. In the years following 2003, the City continued to collect data annually as it pertained to the provision of housing choice and actions taken to overcome or address impediments to fair housing and fair housing choice and began a full update in 2009. In preparing the update to the City's Analysis of Impediments, it was determined that most of the impediments, recommendations and actions undertaken by the City from 2003 to the present were still valid. The City continues to place emphasis on improved education, outreach and enforcement of fair housing laws; improved coordination and enforcement between the various departments and agencies involved with housing issues and fair housing choice including both landlords and tenants; and expanding the availability of housing of all types to make housing available for persons regardless of need. To accomplish its stated goals, the city also stresses the pursuit of a regional solution to housing choice; the encouragement of improved transportation linkages and modes of transit to provide residents greater access to housing and employment; and increased education, skill training and economic opportunity for all individuals are all also important components of the City's strategy to providing fair housing choice.

The City, the local Housing Authority and the many non-profits within the City work to provide housing choice and improve the quality of life for city residents. Still, additional action can be

undertaken on these same issues. Several new issues, such as the difficulty of housing after incarceration or re-entry after prison and housing for persons with HIV/AIDS have been identified as new impediments under this analysis.

## **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 Economic Development, 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. In 2002 the same agencies provided updated material and insight in the preparation of the AI update.

Since its initial Analysis of Impediments was conducted the City has undertaken or participated in several special studies, including multiple homelessness studies, a housing in the mental health community study, a disability needs study, a regional housing needs assessment and a housing mobility program study. Data collection and analysis has also been undertaken as a result of participating in or implementing programs addressing a multitude of housing needs such as the ROOF and NSP foreclosure prevention programs; the Housing Authority's scattered site housing and mobility counseling program; and the

## Homelessness Prevention and Rapid Re-Housing Program (HPRP).

Active participation in the Consolidated Plan development process, through community outreach and program implementation, has provided a means by which the City hears from non-profit housing providers, constituents and other interested entities regarding housing issues. Community meetings, an open application process, public comment periods and web-postings of documents have provided a format for the collection information and comment. In 2009 and 2010 the City prepared an updated five-year Consolidated Plan for Housing and Community Development Programs covering the program years July 1, 2010 through June 30, 2014. Active involvement in this process by a variety of departments, agencies, non-profits and community residents provided insight into community need and potential. Data, background material and recommendations compiled as part of this process has been incorporated into this 2010 update of the AI.

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; and plans and studies prepared by City departments and agencies 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, LCI 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

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. Enhancement and 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.

**a. Summary of Impediments**

As a result of this analysis, the City of New Haven has identified the following impediments to Fair Housing:

- There is a need to encourage regional solutions to the provision of affordable housing choice and supportive housing options for persons with special housing needs.
- There is a need to continue providing housing choice for all residents through the support and development of new housing units in a variety of configurations.
- There is a need to continue to expand the availability of housing of all types to make housing available to all persons regardless of need.
- There is a need to develop improved mass transportation options and linkages both within the City and throughout the region in order to provide better access to housing choice, employment options and services.
- There is a need to promote the economic and educational advancement of all individuals.
- There is an insufficient supply of accessible units for persons with disabilities.



The City of New Haven must continue promoting and supporting actions to increase the supply of accessible housing.

- There is a need to provide improved outreach and communication with the disability community.
- There is a need to continue to develop a dynamic and comprehensive list of accessible housing.
- There is a need to continue to provide housing resource information and technical assistance to persons with disabilities and housing providers.
- There is a need to improve outreach to the disability community about housing information.
- There is a need to improve coordination between groups serving those with disabilities.
- There is a need to continue to provide education and community outreach regarding Fair Housing requirements, laws, regulations and procedures.
- There is a need for improved recordkeeping and coordination regarding Fair Housing and the provision of fair housing choice.

**b. Actions to Address Impediments**

Through the compilation and review of data and information in its Analysis of Impediments to Fair Housing Choice, few incidences of discriminatory conditions were uncovered. While incidences of specific overt discrimination in terms of fair housing choice were not found, the City and its housing providers, continue to keep the public informed about fair housing requirements and work to address other areas of need. It has been determined that the major actions which need to occur to further fair housing and provide fair housing choice are those which build upon the City's current programs and policies. Actions to be taken over the next several years, as they relate to fair housing choice include:

- 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.
- Develop improved recordkeeping system.
- 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.
- 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 educational, skill development and employment opportunities within the City particularly for minorities and other protected classes.
- Provide programs which address foreclosure and its associated impacts of eviction, homelessness and property abandonment.
- Support efforts by HANH to provide housing choice to lower income residents of the City.
- Continue to encourage the creation of affordable rental units within City neighborhoods to provide housing choice for City residents.

- Continue to encourage homeownership in a variety of configurations 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.
- 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.
- 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.
- Work to develop programs to assist the difficult to house, such as individuals recently released from prison, detox centers or other similar environments in order to increase their capacity to access and maintain permanent 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 combined with the creation of new activities; the development of a variety of housing options and the promotion of economic and educational advancement for all persons meet the objectives of affirmatively furthering fair housing choice.

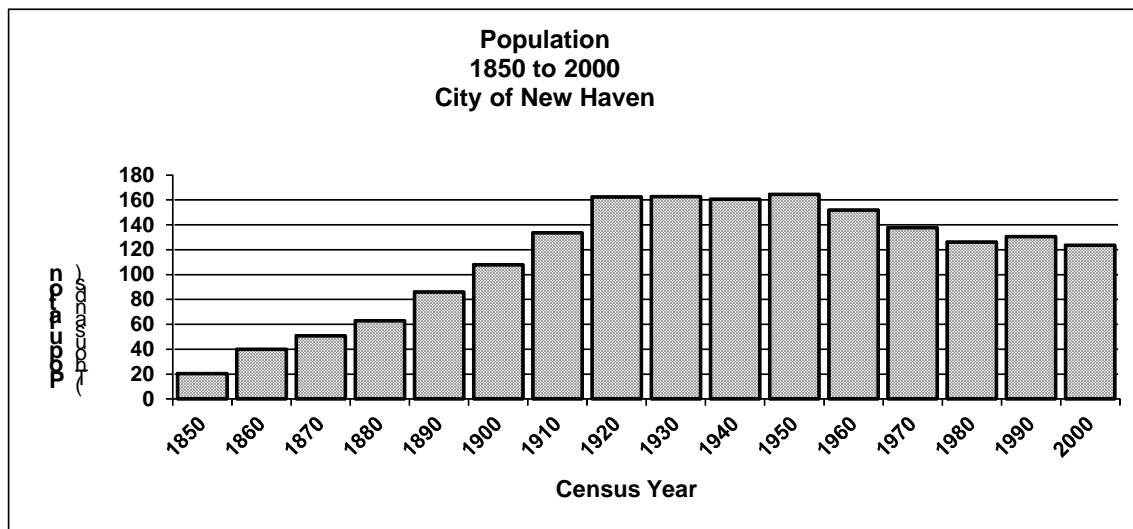
## II. BACKGROUND DATA

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#### 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 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. However, between 1990 and 2000 New Haven's population again declined to 123,626. Estimates for 2009 released by the Bureau of the Census show a population similar to 2000.



Minority population in New Haven increased significantly between 1970 and 1990. Wherein in 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. Estimates for 2009, show that the minority population continues to grow at a rate proportional to the 2000 Census demographics. The release of 2010 Census statistics will provide additional data on the population and community demographic characteristics that will be beneficial to future planning.

**Minority Population Change: 1970 to 2000**

	<u>1970</u>	<u>1980</u>	<u>1990</u>	<u>2000</u>	<u>2009 est.</u>
<b>Total Population</b>	137,707	126,109	130,474	123,626	123,628
Black	36,158	40,235	47,157	46,181	44,678
% Black	26.3	31.9	36.1	37.4	36.1
White	99,986	78,326	70,263	53,723	54,689
% White	72.6	62.1	53.9	43.5	44.2
Other	1,563	7,548	13,054	23,722	24,261
% Other	1.1	6.0	10.0	19.2	19.7

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 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. Estimates for 2009 show an even dramatic increase in the "Other" category with the non-white "Other" population increasing by near 19,000 persons and the white population declining by more than 15,000 persons. Actual 2010 Census counts, due out later in 2011, will provide more accurate population and racial statistics and demographics.

### Hispanic Population Change: 1970 to 2000

	<u>1970</u>	<u>1980</u>	<u>1990</u>	<u>2000</u>	<u>2009 est.</u>
<b>Total Population</b>	137,707	126,109	130,474	123,626	123,628
Hispanic*	4,916	10,042	17,243	26,443	29,434
% Hispanic	3.6	8.0	13.2	21.4	23.8
Non-Hispanic	132,791	116,067	113,231	97,183	94,194
% Non-Hispanic	96.4	92.0	86.8	78.6	76.2

\*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, has demolished vacant, dilapidated and unsafe housing units at a rate faster than the construction of new housing units. 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 American Community Survey data for 2009 reveals that an estimated 59.7% of all households in New Haven are 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.

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

<u>Total Households</u>	<u>2009</u>	
	<u>No.</u>	<u>%</u>
All Households	41,163	
White Non-Hispanic Households	16,588	40.3
All Minority Households	24,574	59.7
Black Households	14,078	34.2
Asian Households	2,017	4.9
Hispanic Households	7,903	19.2
<u>Renter Households</u>	<u>No.</u>	<u>%</u>
All Households	31,669	
White Non-Hispanic Households		35.0
All Minority Households		65.0
Black Households		35.4
Asian Households		5.8
Hispanic Households		22.3
<u>Owner Households</u>	<u>No.</u>	<u>%</u>
All Households	14,494	
White Non-Hispanic Households		51.9
All Minority Households		48.1
Black Households		23.3
Asian Households		3.0
Hispanic Households		12.4

Source: American Community Survey, 2009 Estimates US Census Bureau

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, New Haven had a minority population of 60,211 which was 46.1% of the population. The Hispanic population, at 17,243, which included 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%. These percentages were significantly higher than the surrounding municipalities with the exception of the Hispanic population in Meriden. Estimates for 2009, obtained from the Bureau of the Census' American Community Survey show that the City's minority non-white, non-Hispanic population comprises 66.6% of the City's total population. The Hispanic population was estimated to be 29,434 or 23.8% of the population.



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

	<b>2000 Population</b>	<b>2000 Minority Population</b>	<b>% Minority Population</b>
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**

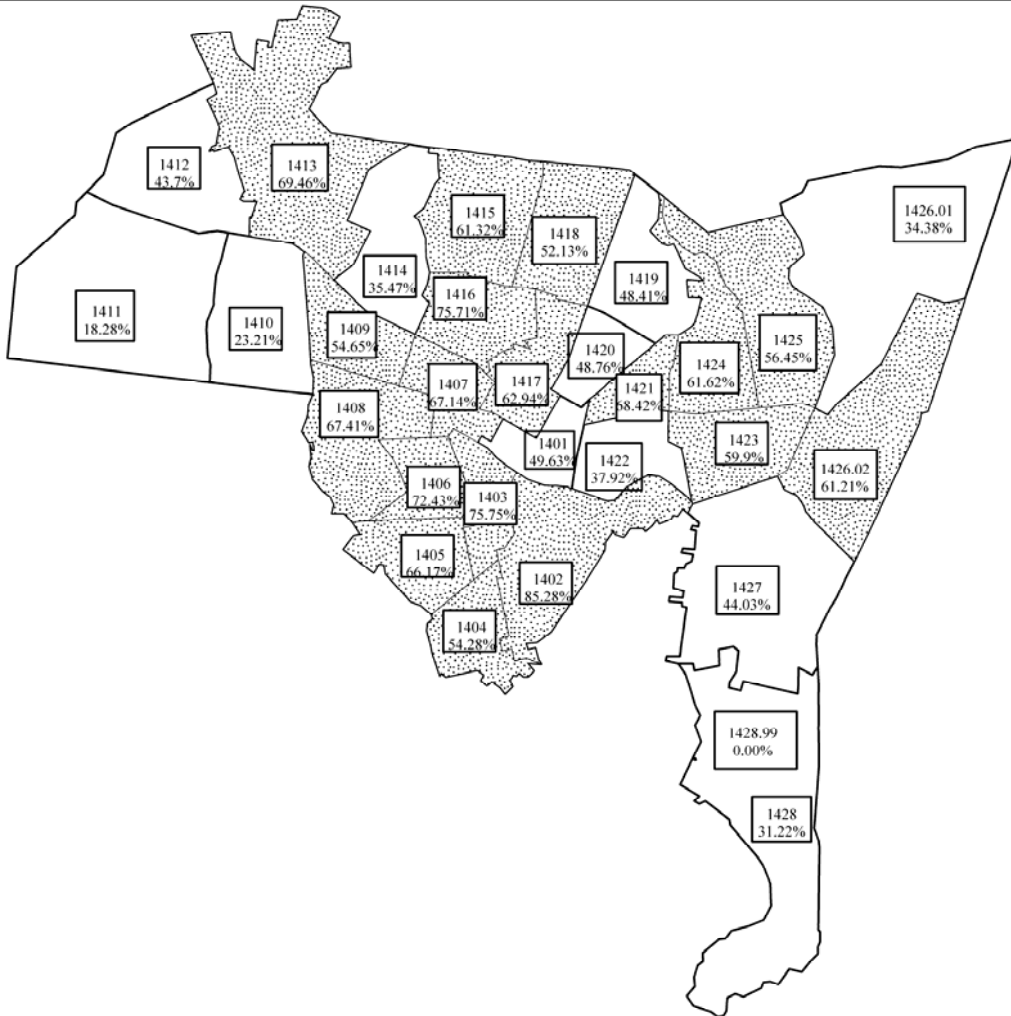
	<b>2000 Population</b>	<b>2000 Hispanic Population</b>	<b>% Hispanic Population</b>
Bethany	5,040	102	2.0
Branford	28,683	737	2.6
East Haven	28,189	1,228	4.4
Guilford	21,398	455	2.1
Hamden	56,913	2,425	4.3
Madison	17,858	240	1.3
Meriden	58,244	12,296	21.1
Milford	52,305	1,750	3.3
<b>NEW HAVEN</b>	<b>123,626</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 this page were included as part of the City's Consolidated Plan for Housing and Community Development. They depict the 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.

# TRACTS WITH LOW/MOD CONCENTRATIONS OVER 51%





## LEGEND

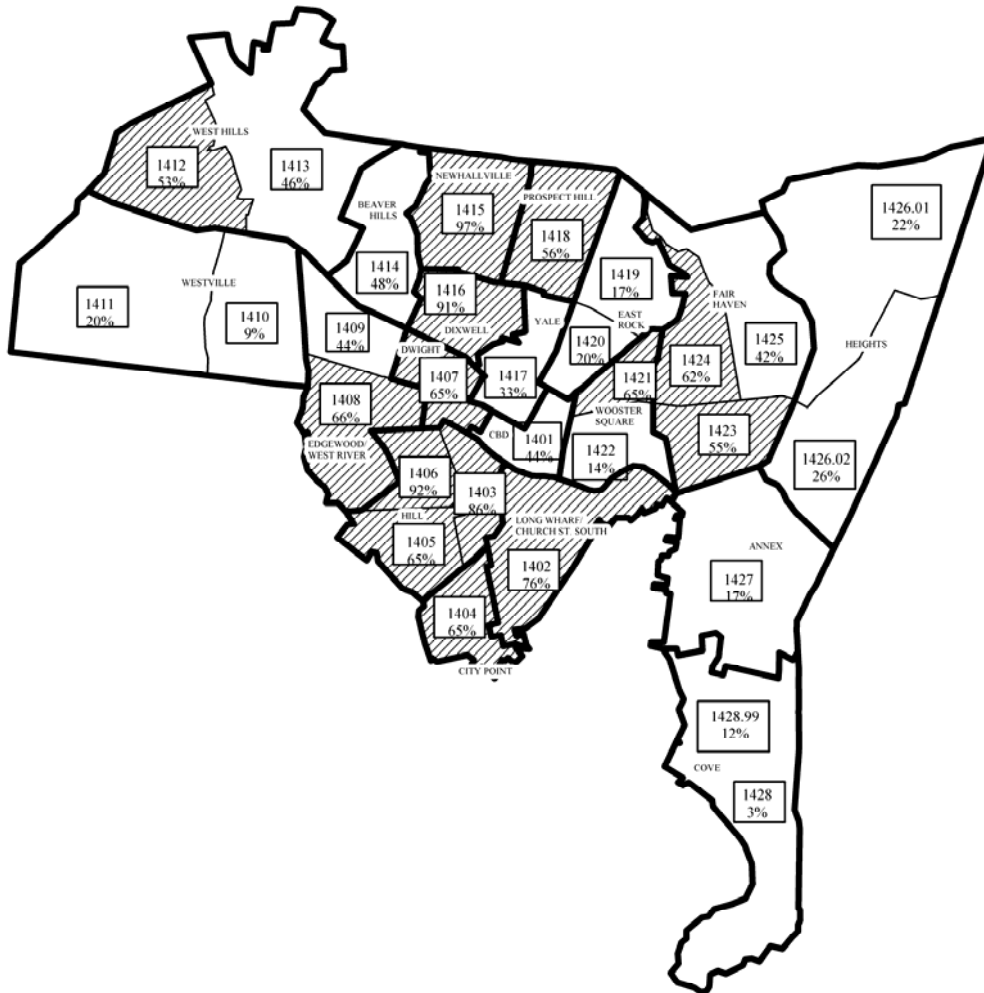
-  CENSUS TRACT
-  TRACTS WITH OVER 51% LOW/MOD



# MINORITY POPULATION PERCENTAGE GREATER THAN 50%

## LEGEND

-  CENSUS TRACT
-  NEIGHBORHOOD BOUNDARIES



## MINORITY CONCENTRATIONS

-  GREATER THAN 50%



## B. Income Data

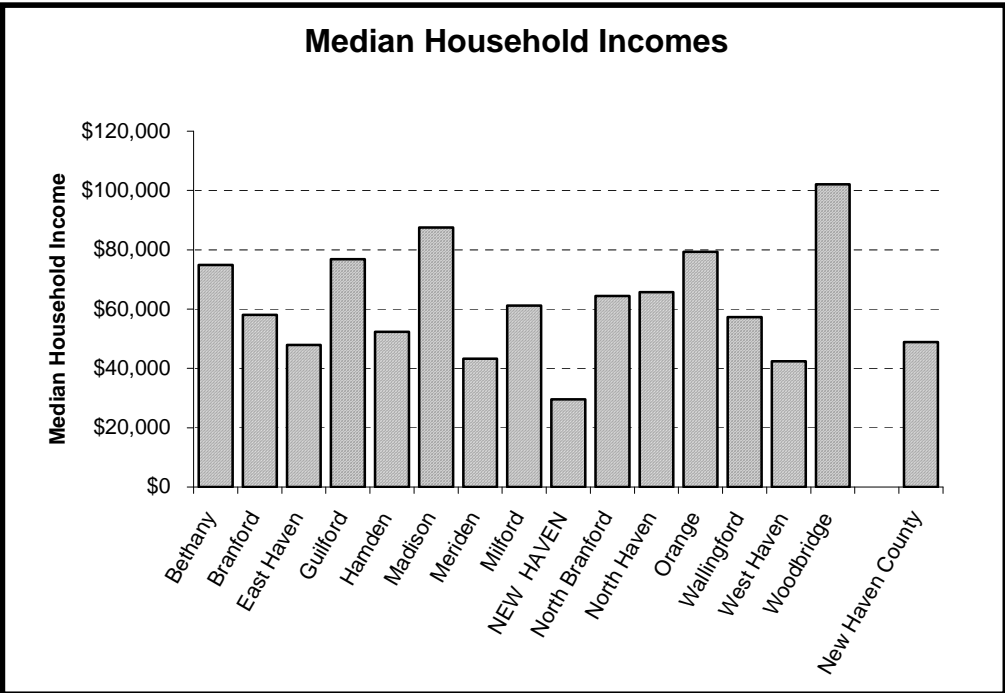
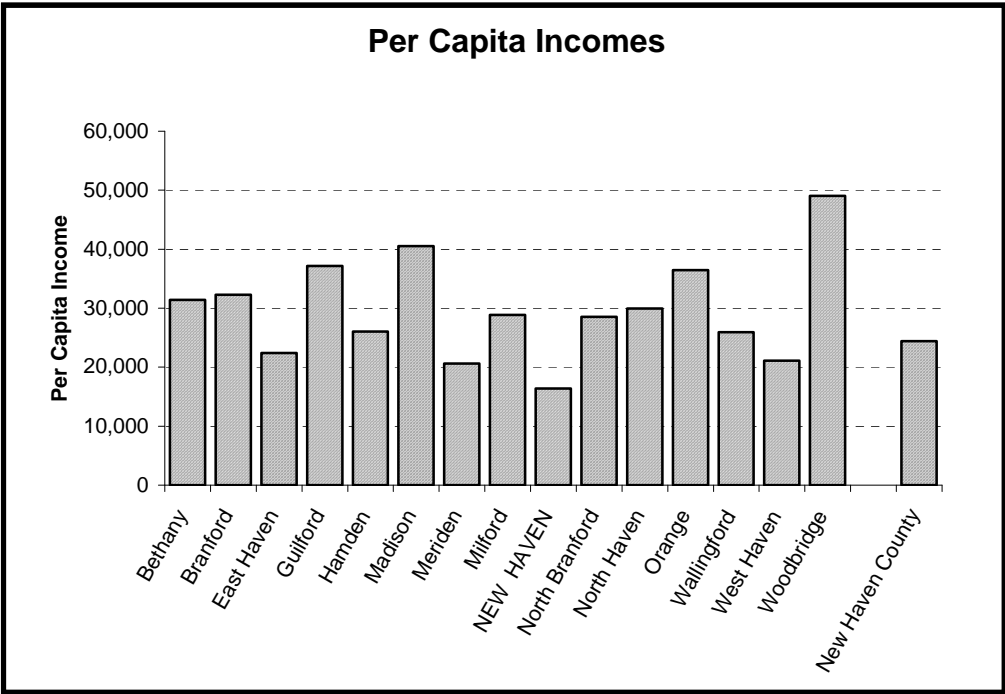
The City of New Haven has the lowest median household, median family and per capita income levels of all of the municipalities in the South Central Connecticut Region. According to 2000 Census statistics, New Haven had a median household income of \$29,640, a median family income of \$35,950 and a per capita income of \$16,393. Census Bureau estimates for 2009 have the City's median household income at \$37,823, median family income at \$46,579 and per capita income at \$23,775.

Charts, which compare New Haven's 2000 Census statistics with the surrounding municipalities follow.

**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**

<u>Name</u>	<u>Type</u>	<u>Full-Time Employment</u>
Yale University	Educational	10,000
ATT (includes SBC/SNET)	Telecommunications	8,100
Yale New Haven Hospital, Inc.	Health Care	6,900
City of New Haven	Government	5,000
Hospital of St. Raphael	Health Care	3,800
Companions and Homemakers	Health Care	1,800
Southern CT State University	Educational	1,600
Pritchard Industries	Manufacturing	1,200
Assa Abloy Inc.	Manufacturing	1,050
New England Home Care	Health Care	875
New Haven Register	Publishing	590
Gateway Community College	Educational	500
Wal-Mart Stores	Retail	480
CovidienBio-Medical	400	
Jewish Home for the Aged	Health Care	300
Radiall USA	Manufacturing	250
A & B Homecare Solutions LLC	Healthcare	250

Source: Office of Economic Development; New Haven Business Digest Book of Lists 2009

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**

	June 2001 Total Non-Farm Employment in Town	Residents Employed	Ratio Jobs to Employed Residents	2001 Unemployed Residents*
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.

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.

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

The majority of the data included in this section is taken from the City's Consolidated Plan for Housing and Development 2010-2014. Census 2000 statistics, 2009 American Community Survey statistics and early release 2010 Census 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. As 2010 Census Data is released it will be utilized to review findings and update statistics of the AI as necessary.

#### **General Characteristics**

*Housing Supply and Occupancy Characteristics:* According to the 2000 Census, there are 52,941 housing units in the City of which 47,094 (89.0%) are occupied while 5,847 (11.0%) are vacant. Most vacant units are structurally sound and are available for rent or may be occupied after rehabilitation. The City estimates that in 2009 there were nearly 877 vacant residential or mixed use buildings.

Most of the City's housing stock is contained in structures with two to four units. Of the 52,941 units 21,879 (41.3%) are in two to four family dwellings. Single-family dwellings are in detached (20%) or townhouses or condominiums (4.0%). Buildings with more than 5 units represent 33.7% of all housing units.

Based upon 2000 Census statistics, 29.6% or 13,927 dwelling units are currently owner-occupied. Approximately Fifty-seven percent (56.9%) of all owner occupied units are in single-family detached structures and 5.9% are in single-family attached structures. Homeownership in multi-family structures is also common in New Haven. 30.4 % of owner-occupied units are in structures with 2 to 4 units. Over 70% of the dwelling units in New Haven are renter occupied. Renters are almost equally split among buildings with less than four units or more than four units. Approximately sixty percent (59.7%) of the City's rental units contain at least two bedrooms. While the current owner/renter ratio is not unusual for a city of 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.

The City's eastern and western most Census Tracts have the highest homeownership percentages. 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.

There is little vacant land available for new large scale residential development without redevelopment efforts. The City Plan Department estimates that less than 2% of all assessed property in the City is vacant residential property. The scarcity of available land is compounded by a variety of site constraints, including steep slopes, ledge, tidal wetlands, brownfields, infrastructure and limited space for parking. 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 an environmentally sensitive site often exceeds that of more typical suburban locations.

Distressed and blighted housing unit continues to be a core issue related to neighborhood stabilization and revitalization 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. This distressed and blighted housing presents opportunity for rehabilitation and reuse in a variety of configurations.

*Characteristics of Vacant Buildings:* In October of 2009, the City's Livable City Initiative Bureau, together with the Building and Fire Departments conducted a survey of vacant properties. As shown in the following table, 983 vacant properties were located in the City. Of these, 877 vacant properties were residential buildings. Over three-quarters of the properties were privately-owned and 100 were in poor or blighted condition. Additionally, due to the foreclosure crisis, it is estimated that 10% of all vacancies are bank-owned properties. Currently, banks hold title to about 250 properties in New Haven. The Hill, Dwight, Newhallville, and Fair Haven neighborhoods have the most vacant properties.

As indicated by the chart below, the City has a designated use for all of the vacant properties it has acquired. The majority of the properties will be used for future affordable and market-rate housing units. Although the City continues to redevelop vacant properties, the number of sites continues to increase as abandonment of older urban properties remains constant. The City has made great strides in addressing and reducing the number of vacant and abandoned properties through its demolition program and various revitalization initiatives. Over the past five years the number of vacant structures was reduced to our goal of 300 in June of 2007, but due to the foreclosure crisis the number of vacant buildings has sharply increased recently.

### Characteristics of Vacant Buildings

RESULTS OF OCTOBER 2009 SURVEY RESIDENTIAL BUILDINGS			
<b>All Vacant Properties w/ unknown status in:</b>			
	Good Condition		125
	Fair Condition		424
	Poor Condition		98
<b>Total:</b>			<b>547</b>
<b>Designated purpose: Residential</b>			
Properties to be developed by the City			30
Properties to be demolished			5
Properties currently being rehabilitated by non-profits/private			106
Properties to be rehabilitated by non-profits/private			100
Sale pending to private individuals			89
<b>Total:</b>			<b>330</b>
<b>Vacant Property Distribution:</b>			
All Vacant Single Family Properties:			339
All Vacant Two Family Properties:			317
All Vacant Three-Six Family Properties:			197
All Vacant Seven plus Family Properties:			9
All Other Vacant Properties:			4
All Vacant Mixed Use Properties:			27
All Vacant Commercial Properties:			106
<b>Total:</b>			<b>983</b>
<b>All Vacant Properties in:</b>			
Downtown	LCI District #1		43
Westville	LCI District #2		122
Hill South	LCI District #3		82
Dwight	LCI District #4		77
Hill North	LCI District #5		51
Dixwell	LCI District #6		35
Newhallville	LCI District #7		178
Fair Haven	LCI District #8		152
East Shore	LCI District #9		81
Whalley/Beaver Hill	LCI District #10		162
<b>Total:</b>			<b>987</b>

According to the 2009 LCI / Fire Department Building Survey, by neighborhood, the Newhallville (178), Whalley/Beaver Hill (162) and Fair Haven (61) have the largest aggregate numbers of vacant properties.

Foreclosed properties are also indicators of need as the foreclosure crisis has resulted in property abandonment and has increased the risk of evictions and homelessness in the city.

As part of its participation in the Neighborhood Stabilization Program (NSP), the City of New Haven has identified fifteen (15) representing the areas of greatest need for housing stabilization and intervention. The census tracts identified for the program correspond to the neighborhoods known as the Hill, Dwight, West River, Edgewood, Amity, Beaver Hills, Newhallville, Dixwell, Fair Haven, and Annex. The areas were identified pursuant to Section 2301(c)(2) of the Housing and Economic Recovery Act of 2008 (HERA). These areas of greatest need were selected to reflect those community areas: (1) with the greatest percentage of home foreclosures; (2) with the highest percentage of homes financed by subprime mortgage related loans; and (3) identified as likely to face a significant rise in the rate of home foreclosures. In the chart below, excerpted from the NSP application, the areas of greatest need are listed first.

Census Tract	Neighborhood	Foreclosures per 100 Res Parcels (2007- Oct 2008)	% All Loans Subprime (2004-2006)	Lis Pendens per 100 Res Parcels (Jan 2008 - Sept 2008)	HUD Risk Score
140300	Hill	2.5%	44.7%	4.1%	10
140400	Hill	1.8%	45.7%	3.4%	8
140500	Hill	5.0%	63.6%	3.6%	10
140600	Hill	5.2%	62.2%	4.5%	10
140700	Dwight/Downtown	3.7%	42.0%	4.2%	8
140800	West River	3.9%	50.5%	2.9%	10
140900	Edgewood	3.5%	46.5%	2.8%	10
141200	Amity	2.2%	50.2%	3.3%	10
141400	Beaver Hills	2.5%	38.7%	4.0%	8
141500	Newhallville	4.6%	63.7%	4.9%	10
141600	Dixwell	2.2%	45.1%	2.2%	10
142300	Fair Haven	4.9%	55.5%	5.3%	9
142400	East Rock/Fair Haven	6.3%	66.7%	5.1%	10
142500	East Rock/Fair Haven	3.0%	49.2%	3.9%	9
142700	Annex	2.7%	43.2%	2.8%	7
140100	Downtown	0.0%	8.5%	0.6%	3
140200	Hill	0.0%	31.8%	0.0%	3
141000	Westville	0.5%	15.5%	1.5%	5
141100	Westville	1.0%	26.8%	1.6%	7
141300	West Rock/Beaver Hills/Westville	1.7%	41.2%	2.0%	8
141700	Downtown	0.0%	10.0%	3.1%	4
141800	Prospect Hill	1.6%	18.3%	2.0%	6
141900	East Rock	0.0%	11.8%	0.6%	4
142000	East Rock/Downtown	0.0%	5.0%	0.2%	3
142100	Wooster Square	2.9%	40.6%	1.7%	10
142200	Wooster Square	0.2%	13.2%	2.6%	6
142601	Quinnipiac Meadows	1.7%	39.8%	2.9%	8
142602	Fair Haven Heights	1.7%	45.6%	2.4%	10
142800	East Shore	0.8%	21.8%	2.0%	5
	<b>Total for all New Haven</b>	<b>2.4%</b>	<b>41.2%</b>	<b>2.9%</b>	

Source: NSP Application; the Warren Group; and Home Mortgage Foreclosure Act (HMDA) data compiled by HUD. Statistics represent the following data points: (1) the percentage of home foreclosures in 2007 and 2008; (2) the percentage of all loans originated that were subprime loans, as reported by HUD; and (3) the percentage of lis pendens in 2008 through September, as an indicator of a rise in foreclosures going forward.

Major New Housing Developments within the City: Although there are several new housing developments that have or are taking place in downtown New Haven, in light of the current economy, the City in 2008 enacted a policy to freeze the construction of new housing developments in areas where there are high levels of foreclosed and/or vacant properties and existing housing rehabilitation activities are on-going in order to stabilize the housing market. The following list highlights recently completed, on-going and planned major new housing or mixed-use developments within the City.

1. **360 State Street Development:** The City of New Haven is now home to the largest residential development in the State of Connecticut. This \$190 million project will consist of 500 new residential units, of which 50 are affordable -20 are Project-Based Section 8 Units developed in partnership with the Housing Authority and 30 will be affordable for people earning 80-120% AMI - and the remaining are market rate units. This 700,000 s.f. project will also consist of other amenities such as a swimming pool, an urban grocery store, a fitness center, a courtyard terrace, views to the Long Island Sound, an early childhood education center and 500 parking spaces. This project is located across the street from the State Street Train Station and will be a LEED-Gold project. It commenced construction in September 2008 and is on schedule to start occupancies in August 2010. Sixteen hundred (1,600) union construction jobs and 200 new permanent jobs will be generated through this mixed use development.
2. **William T Rowe Development:** The Housing Authority of the City of New Haven in partnership with the City of New Haven is planning to redevelop the existing William T. Rowe public housing development on 912 Howard Avenue. The new building will house 104 rental units, 52 of which will be Section 8 project based voucher (PBV)/low-income tax credit units. Preference for occupancy within these units will be given to residents of the existing Rowe property. For those units that are not required to re-house the existing residents, preference will be given to families who qualify for a working preference, subject to applicable federal requirements. The remaining 52 units will be targeted toward working families with incomes at or below 80 percent of the Area Median Income. This building will also consist of a retail/commercial component at the ground level along with other supportive services.
3. **2 Howe Street Project:** This is another recently completed mixed use development within the City developed as a component of the Yale-New Haven Hospital Smilow Cancer Center project. It was built by Intercontinental Real Estate out of Boston with YNH as the main tenant of the building. This site is located within the former Route 34 Right-of-Way for a highway that was never completed. This project contains 24 residential units, 57,000 s.f. of office space, and 15,560 s.f., of ground floor retail in a “wrap-up” structure surrounded in part by an 845-space parking facility. These units will be used to support families in need of services associated with the Smilow Cancer Center with three units designated as affordable.
4. **Three Sisters Condominium Complex:** This affordable condominium complex was recently renovated by the City of New Haven (in 2008) and consists of 12 spacious, modern units. The City’s Livable City Initiative Division is currently in the process of disposing these units to prospective buyers.
5. **West Rock Housing Development:** The New Haven Housing Authority in partnership with the City of New Haven is proposing a project consisting of 357 rental dwelling units in approximately 90 buildings, 38 homeownership dwelling units located in duplex structures, and 38 elderly housing units on the

approximately 98-acre site of the recently demolished West Rock neighborhoods of Rockview and Brookside. This project will replace the 491 dwelling units previously on site with a combination of 202 multifamily rental units and 20 homeownership units in the Brookside area while providing 38 senior dwelling units, 155 rental units, and an additional 18 homeownership units in the reconstituted Rockview portion of the site. Also included in this project is a new 4,000 s.f. maintenance building and additions to the existing community center. This project will be constructed in phases. The first phase of construction will start in February 2010 (infrastructure) and spring 2010 (housing) while the entire project is anticipated to be completed by September 2014.

6. Route 34 West Municipal Development Plan: The New Haven City Plan Department, Office of Economic Development and Transportation Department are currently working on developing a Municipal Development Plan for the Route 34 West corridor in the City located between Howe Street and Ella Grasso Boulevard (Route 10). This Plan will advance a comprehensive revitalization of this largely undeveloped corridor that is comprised of 45 parcels totaling approximately 37 acres. The development of these parcels would likely result in 400-600 new housing units, 60,000 to 80,000 s.f. of office space, and approximately 200,000 to 250,000 s.f. of office/bio-medical space. This is a long term project that will happen over the next 5-15 years.
7. Quinnipiac Terrace (Phase III): On behalf of the Housing Authority of New Haven and its Quinnipiac Terrace Hope VI Program, Trinity Financial is currently developing Phase III of Quinnipiac Terrace development, Phases I and II of which are nearly complete. Phase III is a continuation of the Quinnipiac Terrace Redevelopment Project to completely reconstruct the inefficient and non-functioning public housing complex. This phase will consist of 33 additional rental units, including 17 additional public housing/low-income housing tax credit units which will be subject to a Mixed Finance ACC Amendment between the U.S. Department of Housing and Urban Development ("HUD") and HANH (the "ACC units") and 16 additional low-income housing tax credit/Section 8 project-based voucher units. The project is an additional investment of \$25 million. This project is scheduled for completion in Spring 2012.
8. Proposed Coliseum Redevelopment/Gateway Downtown Development Project: The former New Haven Coliseum site consists of two parcels totaling 5.5 acres in the downtown area and is part of the Downtown Gateway Development Plan. The Gateway Plan consists of several components including the new Gateway Community College currently under construction, allowing for the growth of the Knights of Columbus world headquarters on 1.0 acre of the former Coliseum site and the relocation of the Long Wharf Theatre together with a mixed-use development on 4.5 acres of the former Coliseum site. The 5.5 acres have been cleared and made available for interim surface parking serving the nearby Amtrak/MetroNorth Union Station. The theatre and mixed-use components of the project, currently under negotiation, call for development of up to one million square feet including retail, office and residential. Once developed, the project is expected to produce approximately 750 new jobs, 2.5 million dollars in annual taxes, and roughly 1.6 million dollars as PILOT payments to the City by the State.
9. Downtown Crossing (Route 34 East Expressway Conversion): Route 34 East is a six-lane depressed, limited access highway serving some 30,000 vehicles per day, linking the I-95 and I-91 interchange within downtown New Haven. An initial feasibility study was completed and presented in mid-2007 supporting the conversion of this expressway into an urban boulevard. The City has received a \$5 million federal earmark to move forward on the feasibility study. Initial planning for this comprehensive



effort to remove the physical barrier between downtown and the Medical district to the south of the Connector proposes up to four new development sites totaling approximately ten acres of reclaimed development area; renewed connections across Route 34 between Orange Street and Temple Street; and mixed-use development to include residential, commercial, and bio-medical units, along with structured parking. In addition to restored connections and improved walkability, new development will produce some 444,000 square feet of commercial space, 121,000 square feet of retail, 144,000 square feet of residential comprising some 180 units. The project is expected to produce more than 2,000 new jobs, and an estimated increase of about \$4 million to the City's grand list.

Acquiring energy efficiency and economic sustainability are the targeted goals in all of the above mentioned developments.

## 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 1980's. Additional subsidy mechanisms including tax credits, mortgage revenue bonds, and Urban Development Action Grants, helped to create affordable housing for low and moderate income families. New Haven has also benefited from two HOPE VI grants as well as federal and state funding support for the revitalization of some of its earliest public housing developments. While the Housing Authority of New Haven (HANH) has made tremendous strides in addressing the needs of substantial renovations or redevelopment of many of its existing developments which is detailed herein, there still remains a continued need for renovations or redevelopment in order to extend the useful life of developments and provide quality affordable housing for New Haven's low-income residents. There is also a need to increase accessible units for persons with mobility-related disabilities, both in public and private housing

Current subsidized and assisted housing units in the City include the following as of October 1, 2009:

*Inventory of Assisted Housing*

Housing Program & Type	Planned FY 2010
<b>Public Housing</b>	
General Occupancy	1,022
Mixed Population	972
Elderly	237
Scattered Site	191
Public Housing Subtotal	<b>2,422</b>
<b>Section 8/Housing Choice Vouchers</b>	
Tenant-based vouchers	2,784
Project-based vouchers	263
<b>TOTAL</b>	<b>5,469</b>

The City completed two (2) HOPE VI projects, which replaced older outdated Housing Authority complexes with a new configuration of units. Brief descriptions of the City's two (2) HOPE VI projects follow:

**Monterey Place (old Elm Haven):** Elm Haven consisted of 462 units in low-rise buildings at the time the HOPE VI Grant was awarded in 1993. It was transformed into Monterey Place (rentals) and The Homes at Monterey (homeownership), with the following unit mix:

- 53 homeownership units
- 43 tax credit units
- 15 market rate units
- 281 public housing units (including 99 units of rehab at Edith Johnson & William Griffin/elderly-only developments)

**Total New Monterey Units: 392**

In November 1995, the CCA vs. Cisneros lawsuit was settled making it mandatory for HUD, HANH and the City to replace 183 public housing units outside minority-concentrated neighborhoods and provide 183 Section 8 vouchers to be used in non-impacted areas (totaling the 366 units in high-rise buildings at Elm Haven that were demolished in 1989, prior to the HOPE VI award). The housing authority has fulfilled this obligation and owns 191 scattered site units as the result of the CCA v. Cisneros Settlement Agreement.

**Quinnipiac Terrace/Riverview:** The Quinnipiac Terrace site consists of 176 units in low-rise buildings. The Riverview site consisted of 12 units in row-house, two-story buildings that were demolished in October 2003. Through the HOPE VI Grant awarded in March 2003, the Quinnipiac Terrace/Riverview site has been revitalized and consists of the following unit mix:

Trinity OT Units:

- 114 public housing units (29 of which will be located off-site, St. Anthony parcel)
- 46 project-based Section 8 units

ECCO Riverview Units:

- 8 2-family homeownership units; total of 16 units

**Total New Quinnipiac Terrace/Riverview Units: 176**

## Future Housing Authority Developments

**122 Wilmot Road:** The development of 122 Wilmot Road is integral to the overall West Rock project and due to its location at the entrance to the area will serve as a gateway to the revitalized community. This initiative will develop quality affordable housing for seniors with supportive services and will develop commercial space providing much needed amenities for the community as well as job opportunities for public housing residents. The design plan for the 122 Wilmot Road Project calls for a four-story, wood frame elevator structure. Separate parking areas will be provided for residential and retail tenants. The residential units will consist of 42 one-bedroom and 6 two-bedroom units. The program space will occupy the first floor of the building and provide space for on-site services and community space for resident gatherings and meetings. HANH is looking for a partnership opportunity with nearby Southern Connecticut University. All units will incorporate handicapped accessibility and visibility features (widened doorways and turning radiuses, lowered wall cabinets, visual alarms) and be adaptable to full accessibility, with 3-5 units to be built fully accessible. The entrance to the residential portion of the building will be secure and fully separate from the retail entrances.

**West Rock:** The redevelopment of West Rock, which includes the former Brookside and Rockview Apartments, will transform distressed, obsolete developments into a modern mixed-income community. The West Rock redevelopment plan anticipates 495 new construction units, including the eventual replacement of the Ribicoff Cottages development. Of the 495 new units, 80 homeownership units including 60 market-rate units are planned together with 415 rental units including 70 elderly-only units. Half of the new rental units will receive project based Section 8 assistance, with the other half receiving ACC subsidy. The new West Rock community will be a more socially and economically diverse community of one to four bedroom units serving families and elderly households. An existing community center in one portion of the site houses space for community support staff and a computer learning center, and will provide resident employment training and education programs available to residents of the new community. This existing community center will be expanded by 5,000 additional square feet. The developer/manager will provide a full-time resident service coordinator to assist residents in identifying self-sufficiency goals and resources within the community that can be used to achieve those goals. The Project also includes a 3500s.f. management/maintenance building with community meeting space, on-site parking, and individual unit laundry hook-ups. The Project was designed to promote a family-oriented community environment and will increase the supply of affordable housing in this area as well as revitalize the neighborhood.

**William T Rowe:** The Housing Authority of the City of New Haven in partnership with the City of New Haven is planning to redevelop the existing William T. Rowe public housing development on 912 Howard Avenue. The new building will house 104 rental units, 52 of which will be Section 8 project based voucher (PBV)/low-income tax credit units. Preference for occupancy within these units will be given to residents of the existing Rowe property. For those units that are not required to re-house the existing residents, preference will be given to families who qualify for a working preference, subject to applicable federal requirements. The remaining 52 units will be targeted toward working families with incomes at or below 80 percent of the Area Median Income. This building will also consist of a retail/commercial component at the ground level along with other supportive services.

**QT Phase III:** On behalf of the Housing Authority of New Haven and its Quinnipiac Terrace Hope VI Program, Trinity Financial is currently developing Phase III of Quinnipiac Terrace development, Phases I and II of which are nearly complete. Phase III is a continuation of the Quinnipiac Terrace Redevelopment Project to completely reconstruct the inefficient and non-functioning public housing complex. This phase will consist of

33 additional rental units, including 17 additional public housing/low-income housing tax credit units which will be subject to a Mixed Finance ACC Amendment between the U.S. Department of Housing and Urban Development ("HUD") and HANH (the "ACC units") and 16 additional low-income housing tax credit/Section 8 project-based voucher units. The project is an additional investment of \$25 million. This project is scheduled for completion in Spring 2012.

Public Housing: The Housing Authority of New Haven (HANH) owns and manages 2,422 public housing apartments, including 972 mixed population units (for elderly persons and persons with disabilities), 237 units are designated for elderly residents only, 191 scattered sites, and 1,022 general occupancy units for families with children.

An additional 340 public housing units, in the Monterey Place HOPE VI redevelopment, are managed by BCJ, a private management company. These include 195 family units and 145 units for elderly persons or persons with disabilities. In addition, the Monterey Place redevelopment includes 53 affordable homeownership units targeted to low-income families.

Eastview Terrace redevelopment was completed in 2009 and adds an additional 49 public housing units which is managed by Winn Management, a private management company.

The following table summarizes the unit size of the Housing Authority's public housing apartments:

**Housing Authority of the City of New Haven Unit Analysis by Bedroom Size**

Bedroom Size	0	1	2	3	4	5	7	Grand Total
Elderly Only	123	158	8	0	0	0	0	289
General Occupancy	0	91	533	445	120	23	1	1,213
Mixed Population	587	325	8	0	0	0	0	920
Grand Total	710	574	549	445	120	23	1	2,422

In 2001, the Housing Authority was awarded HUD Moving-to-Work status. The Housing Authority is one of about 30 public housing agencies nationwide selected to participate in the HUD Moving-to-Work De-Regulation Demonstration Project, which provides substantial flexibility from regulatory requirements in order to more effectively meet the local needs and priorities of our community. A primary purpose of the Housing Authority's Moving-to-Work plan is to transform New Haven's public housing stock into housing of choice for our community's low-income residents and families. The Housing Authority is engaged in an aggressive plan of redevelopment and major capital improvements of its public housing apartments. To date, this status has allowed HANH to be very aggressive in creating and updating 1,122 units to modern standards. In 2008, HANH's Moving to Work status was extended until September 30, 2018.

Because of redevelopment and major renovation plans, a large number of public housing units have been off-line and unavailable for occupancy. The Housing Authority vacancy rate of about 9% of apartments is inclusive of reserved apartments for relocation needs of households affected by renovation or redevelopment activities. Several Construction Management and other capital projects were completed during FY 2009. HANH's objective is to achieve and maintain a 5% routine vacancy rate by the end of FY 2010.

Extremely low-income households occupy more than 80% of public housing units. The following table summarizes the income categories of current residents in the Housing Authority’s public housing developments.

Unit Type	Extremely Low	Very Low	Low	Moderate	Not Reported	Grand Total
Elderly Only	176	24	4	0	0	204
General Occupancy	755	193	67	12	3	1,030
Mixed Population	574	51	9	0	1	635
Grand Total	1,505	268	80	12	4	1,869

Housing Choice Voucher/Section 8 Program: The Housing Authority of New Haven manages the Federal Section 8 program within the City of New Haven. The Housing Authority receives HUD funding or budget authority for 4,379 tenant-based vouchers or Housing Choice Vouchers (HCV). These include vouchers designated for specific purposes such as relocation. The HANH currently has leased 3,047 Housing Choice Vouchers.

Project Based Assistance: The Housing Authority administers a number of project-based vouchers for affordable housing apartments developed under the former HUD Model Rehab program; these include 80 SRO units and 61 Fair Haven elderly units.

In 2001 statutory changes increased the flexibility for housing authorities to support, with project-based Section 8 assistance, the development of new affordable housing for low-income persons and families. The Housing Authority has been aggressive in taking advantage of these statutory changes in order to support the development of affordable housing responsive to the needs of our community, particularly supportive housing with services for persons with disabilities.

Home Ownership for Low-Income Households:

In past years, Section 8 housing assistance could be used only to support rental housing costs. HUD now permits Section 8 housing assistance to support mortgage payments and other housing costs of first-time homeowners. The Housing Authority has implemented a Section 8 Homeownership Program to help Section 8-assisted families become homeowners. Through a HUD ROSS grant, the Section 8 Homeownership Program is also available to public housing residents who have effectively prepared for self-sufficiency and homeownership. To date, the Authority has successfully sold 22 homes through the Section 8 Homeownership Program.

HANH’s aim is to encourage families to consider opportunities in the lower poverty neighborhoods within New Haven by aggressively assisting them in their search for units. By providing participants with additional information to aid their housing search in areas of low-poverty, HANH may facilitate participant’s expanded housing search. HANH will utilize real estate consultants to assist in the identification of units in areas of low poverty and link participants to these units.

State of Connecticut Rental Assistance Program: The State Rental Assistance Program is managed by J. D’Amelia and Associates and is funded through the Department of Social Services. It currently provides

approximately 1,500 households Rental Assistance Program Certificates. In New Haven, there are 581 households receiving rental assistance.

*State Section 8 Program:* The contract to administer the State's Section 8 program is held by J. D'Amelia. The total number of vouchers for the State of Connecticut is 5,900. The amount of lease up varies monthly which on the average totals 5,876. There are 1,180 lease ups in New Haven.

*Transitional Rental Assistance Program:* The Transitional Rental Assistance Program is designed for heads of households who have come off of welfare in the last 6 months and are working a minimum of 12 hours a week. Under the program, they are given transitional housing assistance for a year. J. D'Amelia has 150 clients participating in this program, forty (40) of which are New Haven residents.

Through the implementation of all three programs, J.D'Amelia and Associates serves 1,801 households. All of these programs allow for portability of housing assistance, which allows a person originally leasing in New Haven to move to another town in Connecticut and secure housing with rental assistance. Households can also move into the City with portable assistance.

The Housing Authority completed a Section 504 Needs Assessment, as required, to plan for the development of accessible housing apartments for persons with mobility-related disabilities. All major renovation activities incorporate aggressive plans for making units accessible or adaptable. Nonetheless, there is a tremendous need for additional accessible apartments. Although accessibility modifications and renovations of existing public housing apartments are extremely difficult, the Authority completed modifications in 2009 and have identified future units for modifications. In mixed population developments, two-thirds of the units are efficiencies and cannot meet Section 504 requirements without major renovations including break-throughs (breaking through the wall between two apartments to combine them into a single apartment). In family developments, almost every public housing apartment was built townhouse-style, with two stories, and generally with all bedrooms and bathrooms on the second floor.

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.

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

Some of the more recent activities undertaken by the Housing Authority of New Haven to further housing choice for the clientele it serves are summarized in the narrative below.

#### **Activities Implemented to Improve Coordination and Communication - 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. Staff

continues to meet with the providers and other partners on a monthly basis to discuss the progress and any concerns that may arise. Since its inception, the Continuum for Success has produced concrete results:

- (1) the development of four on-site Supportive Housing programs in our elderly/disabled developments
  - the Matthew Ruoppolo Supportive Housing Program,
  - the George Crawford Manor Supportive Housing Program
  - the Robert T. Wolfe Supportive Housing Program
  - the Charles T. McQueeney Supportive Housing Program
- (2) HANH's Project-Based Voucher project to develop, in collaboration with service providers, additional supportive housing units.

### ***HANH Activities Implemented to Improve Coordination and Communication - Landlord Workshops***

The Housing Authority Service Center conducts quarterly workshops for Housing Choice Voucher (HCV) 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 HCV landlords.

### ***HANH Efforts to Provide Additional Supportive Housing***

The Housing Authority has increasingly recognized the substantial need for supportive housing services to help many of its 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.

HANH has expanded its supportive housing program to three additional developments: Robert T Wolfe, an elderly/disabled building of 93 units with 25 slots; Charles T McQueeney, an elderly/disabled building of 150 units with 30 slots; and George Crawford Manor, an elderly/disabled building of 109 units with 25 slots.

HANH plans to expand these services to one additional development during FY 2010-2011.

### ***Provision of 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 build a 47 unit assisted living facility at 122 Wilmot Road. This will be a part of the West Rock Redevelopment Project. The lower floor will include a pharmacy, health care facility and a convenience store for residents. Construction is slated to begin the winter of 2011.

### ***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.

### ***Promotion of Section 8 Voucher Mobility***

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 is currently using a private property management company, which offers free mobility counseling to participants.

### ***Promotion of Increase in Number of Accessible Units***

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 are 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 distributes an apartment listing which includes accessible apartments. HANH hopes to expand our computer capabilities to be able one day to share this information on-line to reach broader populations in need.

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

HANH implements a Section 8 Homeownership Program that helps low-income families with Section 8 assistance to move from renting to homeownership. The Program is part of HANH's Family Self-Sufficiency Program, and it provides homeownership training and counseling to Section 8 participants, who then can use



their Section 8 assistance toward mortgage and homeownership costs. HANH has operated its Section 8 Homeownership Program (SEHOP) program since 2003. HANH's SEHOP program is available to its Family Self Sufficiency (FSS) Program participants who wish to become first-time homeowners and who have satisfied all SEHOP requirements, including income, employment, homeownership training, and other requirements intended to increase families' successful homeownership. Twenty-two (22) families have become first-time homeowners through this program. The Authority also offers homeownership opportunities to low and very low-income households in accordance with Section 24-9 of the United States Housing Act of 1937. This Homeownership Credit Counseling and Training Program consist of a combination of classroom training, one-on-one counseling sessions, and post-counseling. This program is offered to persons interested in purchasing a home as a part of the West Rock Redevelopment.

### ***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 helping its families access services to achieve greater self-sufficiency. 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, and homeownership.

In addition to the FSS program, HANH implements two HUD ROSS grants to provide full-family services to support family self-sufficiency. One ROSS RSDM grant program serves families with children. The other serves elderly persons and persons with disabilities. The grant agreements for both of these programs were originally executed during 2005 with an additional ROSS grant awarded in 2008 to supplement, expand, or build upon services provided. On-going services will continue to be provided throughout FY2010. The purpose of these programs is to offer case management and coordination of services in support of the family self-sufficiency program targeted particularly toward increasing economic self-sufficiency.

### ***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 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:

- **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.
- **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. HANH has operated its Section 8 Homeownership Program (SEHOP) since 2003. SEHOP allows Section 8 (HCV) voucher holders to use their housing assistance toward mortgage and other homeownership costs. SEHOP is available to HANH's Family Self Sufficiency (FSS) Program participants who wish to become first-time homeowners and who have satisfied all SEHOP requirements, including income, employment, homeownership training, and other requirements intended to increase families' successful homeownership.
- **24/9 Homeownership Program.** HANH also offers homeownership opportunities to low and very low-income households in accordance with Section 24/9 of the United States Housing Act of 1937. This Homeownership Credit Counseling and Training Program consist of a combination of classroom training, one-on-one counseling sessions, and post-counseling. This program is offered to persons interested in purchasing a home as a part of the West Rock Redevelopment.
- **Landlord Workshops.** HANH's 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.

## ***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 send their homeless to the City. 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 an 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.

**Emergency Shelter Facilities:** There are nine (9) 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. In the early '1990's one former shelter, Grant Street, became a treatment facility for drug addicted individuals. In addition, the City also lost emergency shelter beds at the YWCA.

### Emergency Shelter Facilities in New Haven

	Capacity	Population Served
<b>Individuals</b>		
Columbus House	81 Beds	46 Men / 35 Women
Emergency Shelter Management	75 Beds	75 Men
Martha's Place	18 Beds	18 Women
Veteran's Administration-Q House	28 Beds	28 Men
Basic Shelter – Youth Continuum	4 Beds	4 Youth
<b>Total Individuals</b>	<b>206 Beds</b>	<b>195 People</b>
Winter Overflow	75 Beds	75 Men
<b>Families</b>		
Life Haven	20 Units	20 Families
Martha's Place	2 Units	2 Families
Christian Community Action	17 Units	17 Families
Domestic Violence Services	5 Units (15 Beds)	Flexible based upon women & their family size
CareWays – New Haven Home Recovery	10 Units	10 Families, 40 Beds
<b>Total Families</b>	<b>55 Units</b>	

**Homeless Youth:** Currently Youth Continuum provides a Street Outreach Program; Umoja House a Transitional Living Program for 10 youth; Basic Center a 4 bed shelter for homeless youth; two (2) Community Housing Assistance Programs consisting of 38 scattered site apartments for youth 17-23; two (2) 9-bed group homes (Forbes House and UNO House); four (4) therapeutic group homes; and counseling, referrals, education, and training to the youth it serves.

The Youth Continuum assists about 1,500 runaway, homeless and at-risk youth a year from throughout Connecticut. Although there is no official count of the number of homeless youth in New Haven, it can be estimated that the number is over several hundred. Homelessness among youth is often harder to quantify because it is more prevalent than a simple count of those on the street. Many homeless youth are not on the street, but are staying temporarily with friends, acquaintances, and distant relatives. Many have had a personal or family history of substance abuse, physical or sexual abuse, and/or involvement with the criminal or child welfare system. 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 either pregnant or with babies and a shelter or group home for teenagers to avoid placing them in an adult shelter situation. There is also a need for targeted and comprehensive support services to ensure at-risk and homeless youth are able to attain the assistance they need to avoid a lifetime of chronic homelessness.

Additional housing for pregnant and parenting teens will address a critical unmet need identified through New Haven's Fetal and Infant Mortality Review (FIMR) process and a coalition of agencies who recognized that too often young women with children do not have safe and secure housing in which to grow with their children. Housing for pregnant and parenting teens will help meet that need by providing young teen mothers with safe and stable housing and enable them to continue their education while learning to become effective parents. The lack of affordable housing and the reluctance of neighborhood property owners to accept youth as tenants are two specific barriers faced by pregnant and parenting teens. In addition, homeless youth face numerous barriers to access that can be addressed by structuring the delivery system to include extensive outreach, and flexibility in policies and procedures. Homeless adolescents present significant problems for health care not only because of the difficulty in

engaging them, but also because of their frequent reluctance to acknowledge their need. Their status as minors, issues of consent and confidentiality and their distrust of adults provide additional barriers to care. In addition, low English proficiency poses an additional gap. According to the Youth Continuum, New Haven’s largest housing provider for adolescents and youth, 53% (115) of the 219 homeless clients served in 2009 were pregnant and/or parenting and 175 youth identified housing as their primary need - of these, 95 had a child or were pregnant. Youth Continuum currently has a 21-month waiting list for transitional housing.

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

**Transitional Facilities:** There are fifteen (15) transitional housing facilities in New Haven: three (3) programs/facilities service families; ten (10) service single adults, one (1) program services veterans and one (1) was a facility for youth. The list of facilities follows:

**Transitional Housing Facilities in New Haven**

Facility Name	Provider Name	Capacity	Population Served
<b>Individuals:</b>			
Pendleton House (MHN/SHP)	ALSO-Cornerstone	20 Beds	Single Males & Females
On the Move	Columbus House, Inc.	14 Beds	Single Males & Females
Sojourner’s Place	Columbus House, Inc.	16 Beds	Single Females
Frank Street (MHN/SHP)	Continuum of Care	12 Beds	Single Males
HOPWA Transitional	Columbus House Inc.	10 beds	Single Males & Females, HIV
Recovery House	Columbus House Inc.	17 Beds	Single Males, Substance Abuse
Grant Street Partnership	Hill Health Center	28 Beds	Single Males, Substance Abuse
Transitional Living Program	Liberty Community Services	16 Beds	Single Males & Females, HIV
Regional II Recovery House	The Connection	20Beds	Single Males & Females
<b>Families:</b>			
Stepping Stone	Christian Community Action	18 Units	18 Units, 50 Beds
Transitional Housing	New Haven Home Recovery	13 Units	13 Units, 33 Beds
Supportive Housing for Families	New Haven Home Recovery,	17 Units	17 Units, 58 Beds
<b>Other:</b>			
Veterans’ Housing	Veteran’s Administration	9 Beds	9 Beds for Veterans
Umoja House	Youth Continuum	2units, 4Beds; 10 Beds	2 units,4 Beds for Youth with children and 10 single beds

Source: Continuum of Care Application: 2009

Columbus House, Inc. is in the process of completing transitional housing for veterans. The project, called “The Homefront” is a house (refuge) for veterans returning from the current wars in Iraq and Afghanistan who have nowhere to go and need support and reconnection. Veterans can live at the house for up to two years as they address the causes of their homelessness. The house is divided into apartments where the men will live together and receive support from both trained staff and each other. The Homefront's goals include: providing

stable housing, encouraging veterans to pursue higher levels of education and vocational training, fostering self-determination, reintegrating veterans back into their communities; and freeing up space in the already overcrowded shelters. With the help of a dedicated volunteer committee, Columbus House and a dedicated steering committee has begun a comprehensive, grassroots fundraising initiative to raise the remaining \$110,000 needed to open The Homefront. (Columbus House has already secured \$310,861 from the US Department of Veterans Affairs and another \$50,000 through the Greater New Haven Community Loan Fund.) Many groups and individuals have conducted fundraisers or have made outright contributions. Corporate donations and grants are also being sought.

*Special Social Services:* Social services for the homeless are often available where medical attention or emergency shelter is provided. Neighborhood-based medical clinics, the Connecticut Mental Health Center 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 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.

*Permanent Supportive Housing:* The City of New Haven and the New Haven Continuum have been focusing their efforts of providing transitional and permanent housing as the most effective means of addressing and reducing homelessness in the City. For many individuals, permanent supportive housing is necessary in order to ensure they receive the medical, life skill, mental health and/or other supportive services that will facilitate the most productive, safe and self-sufficient way of life available to them. The City has a variety of permanent supportive housing facilities within its borders. Over the upcoming strategy period, the City and its affordable and supportive housing providers will continue their efforts to provide a variety of transitional, supportive, permanent and affordable housing options to address the needs of the homeless and low and moderate income individuals and families in the City.

The New Haven Continuum of Care Network and its housing providers have several supportive housing facilities and programs many of which receive or have received funding from HUD through the Continuum of Care Grant Program; the Shelter Plus Care Program and the Supportive Housing Program and through the City's entitlement programs HOME, CDBG, HOPWA and ESG. The Continuum of Care application for 2009 included a listing of 361 beds of permanent supportive housing for individuals (Households without Children) and 224 beds for Households with Children.

PS Housing Facilities in New Haven

Facility Name	Provider Name	Capacity	Population Served
<b>Individuals:</b>			
West Village	ALSO-Cornerstone	15 Beds	Single Males & Females
Wolf	ALSO-Cornerstone	10 Beds	Single Males & Females
Ruoppolo Support Services Program	ALSO-Cornerstone	15 Beds	Single Males & Females
Cedar Hill	Columbus House Inc.	25 Beds	Single Males & Females
Columbus House (scattered site)	Columbus House Inc.	19 Beds	Single Males & Females
Legion Woods	Columbus House Inc.	19 Beds	Single Males & Females
Whalley Terrace	Columbus House, Inc.	20 Beds	Single Males & Females
McQueeny Supportive Services	Continuum of Care	8 Beds	Single Males & Females
New Haven Shelter Plus Care	DMHAS/CMHC	127 Beds	Single Males & Females
Fellowship Commons	Fellowship Place	26 Beds (New)	Single Males & Females
Fellowship Commons – Westville	Fellowship Place	18 Beds (UC)	Single Males & Females
Canterbury Gardens	Leeway	9 Beds	Single Males & Females
Scattered Site	Leeway	4 Beds	Single Males & Females, HIV
Independent Living Program	Liberty Community Services	25 Beds	Single Males & Females, HIV
Open Door Alliance	Liberty Community Services	16 Beds	Single Males & Females
Supportive Living Program	Liberty Community Services	7 Beds	Single Males & Females, HIV
Safe Haven	Liberty Community Services	22 Beds	Single Males & Females
New Haven Family Partnership	New Haven Home Recovery	19 Units, 62 Beds	Families
Supportive Housing Program	New Haven Home Recovery	30 Units, 90 Beds	Families
New Haven Shelter Plus	DMHAS/CMHC	27 Units, 71 Beds	Families
<b>Families:</b>			
Stepping Stone	Christian Community Action	18 Units	18 Units, 50 Beds
Transitional Housing	New Haven Home Recovery	13 Units	13 Units, 33 Beds
Supportive Housing for Families	New Haven Home Recovery,	17 Units	17 Units, 58 Beds
<b>Other:</b>			
Veterans' Housing	Veteran's Administration	9 Beds	9 Beds for Veterans
Umoja House	Youth Continuum	2units, 4Beds; 10 Beds	2 units,4 Beds for Youth with children and 10 single beds

Source: Continuum of Care Application: 2009

### ***Barriers to Housing the Homeless***

As part of the 1999 Homeless Needs Study, several barriers to housing the homeless were identified. While some progress has occurred since the study was initially undertaken, the barriers and suggested recommendations that follow remain valid today:

#### **Income Support/Availability of Funding**

- 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.
- Cuts in funding, particularly cuts in Section 8 funding, have made it increasingly difficult for families and individuals to acquire permanent 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, particularly for drug-related or violent crimes, are ineligible for HUD-funded housing programs or are often shut out of the private market until they have demonstrated rehabilitation.
- 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.
- Termination or reductions in the HUD “Section 8” Voucher program will negatively affect the ability of homeless persons and families to access permanent housing, as well as, impede the ability of New Haven to reduce and/or end chronic homelessness, which is the mission of the U.S. Interagency Council on Homelessness.

### **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.
- Develop additional transitional housing or alternative housing resources with services and supports to assist individuals with criminal justice involvement until they are eligible for mainstream HUD-funded housing assistance.
- Develop an effective Discharge Planning Strategy and Procedures to assist with transitions.

### **Shelter-related Barriers**

- Current funding for services does not allow enough flexibility in the length of stay and nature of services to help individuals progress from the shelter system to housing (90-day policy).
- Due to low salaries for shelter staff, it is difficult to retain workers who have 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 staff 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 ongoing money management, are all that is required to access or maintain housing.

### **Substance Abuse**

- Abuse of alcohol, cocaine, heroin, prescription drugs and other controlled substances alone or in combination can be major factors contributing to homelessness. Managed care, current treatment policies and lack of transportation make eligibility, qualification and access to detoxification, treatment and aftercare highly problematic.
- Crack cocaine is not recognized as a “detoxable substance”. No local treatment centers provide detox services to crack addicts, yet most substance abuse treatment programs require that people be substance free as a condition of entering the program.
- Post treatment, rehabilitative, easily accessible, clean and sober environments and ongoing supports are only available on a limited basis at this time.
- Many opportunities to engage people in recovery are lost due to lack of connection between treatment/rehabilitation and the court system.
- Response to the pervasive problem of alcohol and polysubstance abuse needs to be addressed in a collaborative fashion both with and between service systems.
- 24-hour response capacity is needed citywide for individuals who do not require medically supervised detoxification, but need to have connections to treatment and rehabilitation facilitated.
- Communication amongst providers and case managers needs to cross system boundaries.

### **Recommendations**

- Expand the range of substance abuse service program and community support components to include community sobriety/recovery centers to increase pathways to recovery and the capacity to support individuals and families from relapse, extended follow-up support for after treatment, and services for those who chronically relapse.
- Create and implement a comprehensive social marketing plan to gain support for drug prevention and early intervention citywide.
- Long-term clean and sober social, vocational and educational environments should be available on a voluntary, unlimited basis serving both recently housed and homeless individuals who have embarked on the path to recovery.
- Formalize coordination mechanism between the criminal justice system and substance abuse service.

To build upon its programs and policy development, as part of the New Haven Ten Year Plan to End Homelessness, four goals were identified to decrease the barriers to housing and achieve success for people who are homeless. These goals are listed below.



**Goal 1: Improve access to, and coordination of, housing and services for homeless individuals and families.**

- Expand permanent supportive housing opportunities. **(Priority #1)**
- Expand employment opportunities for people who are homeless or at risk of long-term homelessness **(Priority #2)**

**Goal 2: Strengthen efforts to prevent people from becoming homeless. (Priority #3)**

- Prevent people from becoming homeless when they leave institutional care.
- Help at-risk households remain stably housed by improving access to supportive services through expanded case management and providing emergency assistance.

**Goal 3: Engage in public policy and public awareness efforts to address the barriers that contribute to chronic homelessness (Priority #4)**

- Work with elected officials at the local and state levels to change policies that serve as barriers to ending chronic homelessness
- Educate and engage regional citizens and organizations in the effort to end chronic homelessness

**Goal 4: Strengthen mechanisms for planning and coordination to support implementation of the plan (Priority #5)**

- Create the infrastructure to implement the plan
- Create a centralized database to promote information sharing and service coordination

## **Housing and Residential Facilities for Individuals with Special Needs**

A variety of housing options and residential facilities for individuals needing supportive services or other alternative living environments exist in New Haven. Because of the availability of medical, psychiatric and social services within the City, facilities for persons with special needs are usually located in New Haven.

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.

Lack of housing continues to be a significant problem for persons with disabilities. According to Priced Out in 2002, people with disabilities receiving SSI benefits pay 90.2% of their SSI check to rent a one-bedroom at HUD Fair Market Rents in New Haven. The Report for 2002 shows that people with disabilities receiving SSI benefits needed to triple their income to afford a decent one-bedroom unit.

Clearly, New Haven has a need for additional accessible or adaptable rental units. While Federal accessibility laws and the State Building Code will, by their adoption, create more units, there are other policy changes which need revision. The Housing Authority has undertaken aggressive plans to develop accessible or adaptable apartments in renovations/revitalization projects of its public housing stock, but nonetheless the need for accessible housing is much greater than the available, affordable, accessible units in New Haven's public housing. Additionally, the public and non-profit agencies need to be made aware of the differing needs

of the elderly who are 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.

While New Haven has recently seen an increase in new or renovated private apartment buildings, many being adaptable or accessible and suitable for individuals with disabilities, they are often too expensive for the population in need. As a result, it can take an individual with a disability at the low end of the economic spectrum six months to in excess of two years to find suitable, accessible housing. The wait for an accessible unit provided by HANH is currently one to two years.

Substance Abuse: It is estimated that between 7,000 and 11,000 New Haven residents abuse drugs and alcohol. New Haven has a variety of programs and resources available that provide services to substance abusers. A representative listing of the programs and resources available in the City includes:

### **New Haven Substance Abuse Resources**

**Detox:**

South Central Rehabilitation Center

**Out-patient Treatment:**

Adolescent Day Hospital  
ALSO/Cornerstone  
Central Treatment Unit  
Evening Chemical Dependency Program  
Grant Street Partnership  
Hispanic Clinic  
Apt Foundation, Legion Ave. Clinic  
Multi-Cultural Ambulatory Addiction Services (MAAS)  
Northside Community Out-Patient Services  
Substance Abuse Treatment Unit (SATU)  
Women in Treatment

**Residential Treatment:**

Amethyst House (women & children)  
Crossroads  
Grant Street Partnership (men)  
Teen Challenge

**Transitional Housing/Aftercare:**

ALSO/Cornerstone-Pendleton House  
Christian Community Action-Stepping Stone  
Columbus House, Inc.-On the Move  
Columbus House, Inc.-Sojourner's Place  
Continuum of Care-Frank Street  
Connecticut Women's Consortium—Homeless Families  
Transitional Collaborative  
Davenport House  
Fellowship Place  
Gibbs Restoration House  
Hill Health Center-Grant Street Partnership  
Hope House  
Liberty Community Services-Transitional Living Program  
New Haven Home Recovery, DCF, ALSO Cornerstone, The Connections-Supportive Housing for Families  
The Connection-Region II Recovery House  
Salvation Army-Adult Rehab Center  
Veteran's Administration-2 Houses  
Youth Continuum-Umoja House

Developmentally Disabled: 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**

ACORD	New Haven
Benhaven	New Haven
Continuum of Care, Inc.	New Haven
Chapel Haven	New Haven
HART	Hamden
Institute of Professional Practice	Woodbridge
Kennedy Center	Hamden
Marrakech, Inc.	New Haven
New Samaritan, Inc.	East Haven
Opportunity House	Hamden
SARAH Seneca Residential Services	Branford
SARAH Tuxis, Inc	Guilford
Vantage, Inc.	North Haven

**Vocational**

ACES/ACCESS	North Haven
ARC of Greater New Haven	Hamden
Benhaven Adult Vocational Services	East Haven
Easter Seals Goodwill Industries	New Haven
Institute of Professional Practice	Woodbridge
SARAH, Inc.	Guilford
South Central Connecticut Agency on Aging	West Haven
Marrakech, Inc.	New Haven

*Serious Mental Illness:* The Mental Health Needs Assessment, conducted by The Consultation Center as part of the Consolidated Plan update process in 1999, estimates 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) 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 the benefit they would receive 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.

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:

- 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 victims 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 2009”, which is available on their website 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 cannot afford the rental housing available in New Haven. This results in many individuals or families occupying substandard housing, being in unsatisfactory living arrangements or becoming 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, supportive housing (five-year rental subsidies for tenant and sponsor-based housing and 10 years for Project-Based Rental Assistance) for 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.

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.

*At-Risk Youth:* The Youth Continuum provides outreach, counseling, referral, and shelter to runaway, homeless, at-risk or street youth. Youth Continuum administers several housing assistance and supportive housing programs for at-risk youth. The Umoja House is a transitional housing program serving 17-23 year old homeless youth as well as youth preparing for independent living. The Umoja House can serve up to 15 youth in a congregate care apartment, with 24-hour/day staffing. The HOSTS

program, which is co-located with the Umoja House, provides support to homeless youth in the City of New Haven. HOSTS offers street outreach services to identify homeless youth, and provides case management services to link youth to appropriate health, mental health/substance abuse, job and educational training programs, and emergency housing options within the community.

The Community Housing Assistance Program (CHAP) is a State Department of Children and Families (DCF) funded transitional, scattered site apartment program for youth ages 17-23. Clients must be DCF committed, enrolled in an educational program and employed part-time. Apartments are leased to Youth Continuum and sublet to program participants. The Forbes Group Home and the Uno Group Home are both 13-bed long-term residential group homes, which serve youth between the ages of 12 and 18. Support programs are designed to prepare the youth participants for independent living.

The Education, Job Training and Enrichment Center (ETEC) offers tutoring, job training, skill development, life skills classes and cultural enrichment opportunities for youth served by Youth Continuum programs. This program provides service enhancements for at-risk youth that are not funded by State or Federal contracts.

Elderly: According to the 2000 Census, the total population of the City of New Haven is 123,626. Of those, 16,232 individuals, or 13.1%, are over the age of 60. The 1990 Census figures revealed that 21.7% of all households were headed by people 65 years or older. In the 2000 Census, that percentage dropped slightly to 18.18%. In 2000, there were 47,094 total households in the City of New Haven. Of these, 3,728 householders over the age of 65 owned their own homes (26.7% of all owner occupied) and 5,133 householders over 65 rented (15% of all renter households). In addition, there are 2,988 grandparents living in households where grandchildren under the age of 18 reside. Of those households, 54.9% or 1,641 are responsible for raising their grandchildren. Another interesting and underrepresented group is individuals over the age of 60 that identify themselves as having a physical, mental or sensory disability. According to the 2000 Census, 11,876 individuals over the age of 65 consider themselves living with a disability. The need for affordable, universally accessible housing, which can accommodate nontraditional family structures, is greatly needed. Concerns have also been raised about suitable housing and services for grandparents who are the legal guardians of very young children.

In October of 2002, the State of Connecticut Department of Social Services conducted a needs assessment as part of its State Plan on Aging. The ten (10) highest ranked needs of the elderly ranked in order of priority are prescription drugs, concerns over social security, Medicare and pension income, high medical costs, concern over finances, home care and nursing homes, poor health, understanding Medicare and other health options, transportation, housing and inadequate medical care.

The South Central Connecticut Area Agency on Aging in its three-year plan (FY '02-'05) identified these 12 needs, via focus groups, as the most pertinent for our service area: transportation, help with prescription drugs, friendly visiting/companion programs, affordable housing, information and

assistance, chore/in-home assistance, deteriorating health, nutrition, loss of independence, need for information, and need for advocacy, public safety.

The City of New Haven, Department of Elderly Services has identified the following needs of the City's older population based on questions arising from inquiries of the general public as well as via casework performed by the Department. The needs identified by the Department include:

- **Health and wellness** – Seniors can choose to be part of exercise classes 2-3 a week at each senior center.
- **Home care** - Affordable or subsidized in-home services (housekeeping (inside and outside), bathing, dressing) which will allow individuals to reside in their homes for a longer period of time resulting in a higher quality of life. Allowing individuals to sustain the life that they are used to living will result in shorter stays in nursing homes, which is a financial drain to our state economy, and leads to rapid health deterioration.
- **Transportation** – Affordable and accessible transportation readily available during the week as well as on weeknights and weekends keeps individuals active, independent and promotes self-sufficiency.
- **Senior housing** – Affordable, accessible housing for elderly only individuals which should include assisted living housing developments as well as housing developments for grandparents raising grandchildren
- **Prescription drug assistance** – The rise in cost of prescription drugs continues to escalate as does prescription co-pays. Individuals are often faced with the burden of choosing to pay either for their medications or other household necessities. Often, individuals choose to go without their medications in order to pay their rent or buy food. The result of choosing one necessity over medications is deteriorating health, illness, hospitalization and/or death. Financial assistance for individuals who do not meet state or federal programs as well as advocacy around the cost of these scripts is vitally important.
- **Socialization and recreational programs** – Symptoms of loneliness and depression are common among the elderly, especially for those whose family members and friends have passed away, as many are engaged in less activity. The need for socialization, recreational and educational programming is important for ones self esteem, mood, and overall health. It is important to provide stimulating experiences daily. The City operates 3 senior centers, to help to meet this need.

- **Nutrition** - Older adults who live in poverty are more likely to suffer from poor nutrition. Good nutrition plays an integral part maintaining a healthy lifestyle. It is known that good nutrition delays or prevents disease. There is a significant need to support food programs, which aid in providing nutrition to the City's older population. These programs include congregate meals, meals on wheels and food subsidies.
- **Finances** – Many older adults are rightly concerned with meeting the high cost of living as their incomes do not meet the demand. Housing costs are high as are other expenses (e.g., insurance premiums) and older individuals live on a fixed income. Older women are especially vulnerable as they are less likely to receive pension income and usually receive less Social Security income due to lower wages.
- **Supportive programs** – The increase in grandparents raising grandchildren as well as caregivers to the elderly indicates that the caregivers need services to maintain their physical and mental health so that they may function at an optimal level. Funding for respite care programs for caregivers needs to increase so that there are more opportunities for respite programs and more resources for the caregivers.
- **Public safety** - Every individual deserves to feel and live safely in their homes whether they reside in single, multi or private or public housing complexes. Older individuals often are the targets of exploitation, fraud and abuse. In addition, many older adults are afraid to leave their homes after dark and even during the day resulting in further isolation.

As the City's older adult population increases over the next few years, the number of individuals who will seek assistance will increase. The Department of Elderly Services has already seen an increase in non-English speaking older adults requesting services. The City needs to recognize the need to hire staff who are bilingual and bicultural and train those who are not in the various populations we will encounter and serve in future years.

*Housing Opportunities for Persons with HIV/AIDS (HOPWA)*: HOPWA funds may be used to assist all forms of housing designed to prevent homelessness for persons living with HIV/AIDS, including emergency housing, shared housing arrangements, apartments, single room occupancy (SRO) dwellings, and community residences. Appropriate supportive services must be provided as part of any HOPWA assisted housing. The HOPWA program administered by the New Haven Health Department provides permanent housing, community and group residences, transitional housing, scattered site residence, emergency shelter and independent living programs. In addition to housing, all of the programs provide supportive services including, but not limited to, case management, substance abuse counseling, life skills and educational training, as well as food and clothing services. The State of Connecticut has been an entitlement area since FY 1992. New Haven became an eligible Metropolitan Statistical Area in FY 1996 when it exceeded the 1,500 case threshold. The number of Persons Living



with HIV/AIDS (PLWHA) in New Haven County reported by the Connecticut Department of Public Health through December 31, 2008 is 1,580. New Haven ranks second in the State with the highest number of Persons Living with HIV/AIDS (PLWHA). Because **HOPWA is a regional grant, applicants for HOPWA funds can be located anywhere within the New Haven Metropolitan Statistical Area (MSA)** which includes all of New Haven County and the municipalities of Ansonia, Beacon Falls, Bethany, Branford, Cheshire, Derby, East Haven, Guilford, Hamden, Madison, Meriden, Middlebury, Milford, Naugatuck, New Haven, North Branford, North Haven, Orange, Oxford, Prospect, Seymour, Southbury, Wallingford, Waterbury, West Haven, Wolcott, and Woodbridge. The City of New Haven and its Continuum of Care members collaborate with housing providers throughout the region to provide housing and supportive services to persons living with HIV/AIDS and their families.

As of July 2009, there are more than 420 housing slots designated to persons and their families living with AIDS. Of the designated slots, 260 are in the form of scattered site and 160 are in the form of transitional and community residences.

One of the biggest barriers to providing housing and services to Persons Living with HIV/AIDS (PLWHA) is the method by which funding is allocated. Funding allocations are based upon the number of new cases identified and not on the number of active HIV/AIDS cases. The reality is that PLWHA are living longer and, therefore, require housing and supportive services for many years. The method for distributing HOPWA funds does not take into account the number of persons *living* with HIV/AIDS. The reality for many communities is that the level of HOPWA funding is not keeping pace with the needs of persons with HIV/AIDS.

## **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 a 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 Government's regional housing task force are working to develop an implementation strategy to address identified housing issues and provide solutions on a more regional basis. Designated staff from the City Plan Department participate in these regional planning efforts to represent the City's position and interests on behalf of the administration.

## **II. 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 Fair Housing Program**

The City has reorganized the administrative structure of its Fair Housing program by moving the responsibilities for the program into the Fair Rent Commission and combining the Fair Housing Officer duties with the duties of the Fair Rent Officer. Reorganization of the administrative structure of the program makes it possible to address a multitude of housing issues under one roof providing New Haven residents with a variety of programs and services.

The function of the Fair Housing Program, as set forth in the New Haven Code of Ordinances and its amendments is “to promote mutual understanding and respect among, and encourage and assure equality of opportunity for all the people of New Haven without regard for their race, color, religious creed, age, sex, marital status, sexual orientation, familial status, national origin, ancestry, legal source of income or physical disability.”

The City’s Fair Housing Program provides discrimination complaint processing, educational outreach, and supportive program referrals to city residents and others affected by potential discriminating action. The Fair Housing Program reaches out to the Spanish-speaking community through bi-lingual communications informing them of the complaint process regarding discrimination in housing and in public accommodation.

To increase awareness on fair housing practices, the City as part of its Fair Housing Program provides educational outreach. Outreach provided in the past included scheduling and participating in fair housing workshops; the distribution of pamphlets and flyers; and interaction with community-based organizations. Through these efforts city staff can identify potential issues and address the housing needs of the community.

The City through its Fair Housing Program provides housing discrimination awareness announcements through communication via radio, community television and newspapers, and provides educational outreach materials on housing and public accommodation discrimination for the general public and the community.

The City distributes a Fair Housing Referral Guide in both English and Spanish to residents, community agencies and other agencies throughout the New Haven area. This package is filled with information regarding discrimination in housing, fair housing laws, sexual harassment in housing and predatory lending. Although the Fair Housing Program does not receive or process predatory lending complaints, they do make referrals to the Association of Community Organization for Reform Now (ACORN) or the InfoLine.

As part of the Fair Housing Program the City receives discriminatory housing and public accommodation complaints from citizens. Most of the inquiries or complaints received allege discriminatory practice based on an individual's legal source of income or are from homeless families or families about to become homeless. When it is determined that an inquiry falls outside the jurisdiction of the City's Fair Housing Office, housing and public accommodation referrals are made to appropriate agencies throughout the state to assist the household in need.

As described above, as needed, housing and public accommodation referrals are made to the appropriate agencies when it was determined that the inquiry fell outside the jurisdiction of the City's Fair Housing Office. Listed below are the agencies and/or organizations where referrals were made:

- Connecticut Commission on Human Rights and Opportunities
- Connecticut Fair Housing Center
- Commission on Equal Opportunities
- City of New Haven Legislative Services
- Housing Authority of New Haven
- City of New Haven Elderly Services
- City of New Haven Disabilities Services
- City of New Haven Fair Rent Commission
- City of New Haven Livable City Initiative Code Enforcement Unit
- Statewide Legal Services
- HOME Inc.
- Neighborhood Housing Services
- City of New Haven Legal Aid Assistance Association
- Christian Community Action
- The American Red Cross
- Association of Community Organization for Reform Now (ACORN)
- Greater New Haven Community Loan Fund
- Empower New Haven, Inc.

- 211 InfoLine

The Connecticut Commission on Human Rights and Opportunities was contacted regarding the number of housing complaint cases closed in New Haven between 2006/2007 and the present. Ten (10) cases originating in New Haven were closed during the program year. Of these cases, four (4) were on the basis of physical disability, two (2) were due to race, and one each of the remainder were due to marital status, source of income, mental disability and religious creed.

	<u>2006/07</u>	<u>2007/08</u>	<u>2008/09</u>	<u>2009/10</u>	<u>2010/11*</u>
<b>Complaints</b>	<b>17</b>	<b>12</b>	<b>10</b>	<b>6</b>	<b>2</b>

\* As of February, 2011

Source: Connecticut Commission on Human Rights and Opportunities

There have been no overt incidences recorded in regards to Fair Housing in the City of New Haven since preparation of the previous Analysis of Impediments.

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



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

##### A. Public Sector

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

*Real Estate:* New Haven, as with many cities and towns in Connecticut, recently experienced a dramatic decline in residential property value due to the economic downturn. However, housing value had little or no impact on housing cost which increased dramatically. Median contract rent is up 33.7% from \$487 to \$651. The rise in housing rental cost is attributed in part to the revitalization of New Haven and increasing private market interest in market rate housing development. In 2010, three market rate developments (approximately 750 units) were completed. Affordable housing proposals, such as the Quinnipiac Terrace Hope VI and a portion of Ninth Square Phase II, however, were largely government-initiated.

*Neighborhood Development and Site Selection:* The high costs involved in site acquisition, demolition, and brownfield remediation have made it difficult to identify suitable sites for affordable housing within the City. Also, the City is comprised of just 18.9 square miles and is generally considered to be a fully-developed, high density community (approximately 6,500 residents per square mile) compared to the region (1,500 residents per square mile).

The City's most stable neighborhoods, in general, are pedestrian-oriented, aesthetically pleasing and environmentally sound. There are walk-to-work options and convenience goods in accessible locations. Community services, including schools, parks and playgrounds are within a reasonable walking distance of many homes. Tree-lined residential streets, as well as the surrounding commercial areas, enhance the City's urban environment.

With this in mind, there is increasing consensus that City priorities for housing development should be aimed at the existing stock, including blighted buildings, troubled condominium complexes and suitable adaptive reuse possibilities. In addition, there are continuing efforts to develop contextual mixed income infill residential development at the single- and two-family scale to deconcentrate poverty.

While these objectives often are more expensive than large-scale, multi-family affordable housing complexes at the time of construction, the strategy is more sustainable over the long-term and will create lasting neighborhoods of mixed income thus promoting workforce housing.

The City Plan Department and Empower New Haven recently completed neighborhood plans in three of the Empowerment Zone neighborhoods. In addition, City Plan released a

Comprehensive Plan of land use and development in 2001. This 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.

#### Need for Redevelopment Planning:

As the City continues to renovate and rehabilitate housing within its neighborhoods, it has become more difficult to easily acquire vacant buildings or purchase homes from the private market suitable for rehabilitation. It is becoming apparent that the City, in support of its community development and neighborhood revitalization efforts, may need to utilize the Redevelopment Plan Process as a means to acquire buildings and properties that are key to neighborhood revitalization but not easily acquired.

Land Use and Zoning: Land use development is regulated by a zoning ordinance, which controls both the number of units on a site and the placement of units on a site. Even in the most restrictive zone, the development of affordable housing is possible. An RS-1 zone allows for approximately six units per acre. (By comparison, the RM-2 zone allows approximately 22 units per acre). The permissible densities allow developers to build at higher densities than in surrounding communities, thereby reducing per unit development costs.

Through site plan review and approval process, the City Plan Commission controls the placement of buildings, landscape planning and other site improvements. In this manner, the Commission advances the objectives of the City's Comprehensive Plan of Development: high quality design and sense of place. This is an important local consideration, because certain zoning regulations, over time, have eroded the inherent and prevailing character of New Haven's neighborhoods. In ways quite similar to the objectives of the HOPE VI program, affordable housing must blend more seamlessly with its surroundings.

At times, the City has successfully worked with affordable housing developers (e.g. Mutual Housing and Neighborhood Housing Services) to achieve a lasting balance of density and urban design. At other times, affordable housing projects have failed to gain approval, in part due to the public deliberation and site design review process. There are many lessons learned from failed attempts, including the need to build community support early in the process; the need to respect the site and its environment; and the need to demonstrate the community benefits and expected outcomes.

The Comprehensive Plan provides a framework to assist developers through the site selection and zoning approval process. The plan recommends both neighborhood target areas and zoning amendments, which over time will contribute positively to the land use pattern of the

City. The creation of a form-based code that promotes an increase in density, affordable housing and mixed use opportunities should be considered by the City. Increased density should be allowed along rail lines and near transit stations to encourage transit-oriented development and thus achieve sustainable environment.

Land Resources: The City of New Haven is comprised of 18.9 square miles and is generally considered a fully-developed city. The City Plan Department estimates that less than 2% of all assessed property in the city is vacant residential. The scarcity 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. 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 completed neighborhood plans in three of the Empowerment Zone neighborhoods. In addition, City Plan completed a new comprehensive plan of land use and development. The 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 and the HUD Lead 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.

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.

Affordable Housing and Fair Share Allocation: New Haven has the largest share of affordable housing developments in the region. The need for affordable housing opportunities within the City of New Haven must be balanced against the lack of affordable housing and the availability of land in the suburbs. New Haven has traditionally accepted the responsibility for providing the vast majority of subsidized units for the region's need. While representing only 15% of the region's land, New Haven has more than 60% of the subsidized units (State of Connecticut Department of Housing). There is a need to spread out affordable housing opportunities across the region as fair share allocations proposals also indicate that the City's share of affordable housing exceeds 30% while a minimum of 10% is what is needed in any city or town.

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, 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.

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.

### 2007 Affordable Housing Appeals List

Town	2000 Census Housing Units	Governmentally Assisted Units	CHFA Mortgages	Deed Restricted Units	Total Assisted Units	Percent
Bethany (NE) *	1,792	0	3	0	3	0.17%
Branford (NE)	13,342	252	171	0	423	3.17%
East Haven (NE)	11,698	507	286	0	793	6.78%
Guilford (NE)	8,724	138	31	0	169	1.94%
Hamden (NE)	23,464	1,499	394	4	1,892	8.06%
Madison (NE)	7,386	91	1	25	117	1.58%
Meriden (E) **	24,631	2,575	1,016	4	3,595	14.60%
<b>New Haven (E)</b>	<b>52,941</b>	<b>14,258</b>	<b>1,076</b>	<b>477</b>	<b>15,811</b>	<b>29.87%</b>
North Branford (NE)	5,246	68	50	0	118	2.25%
North Haven (NE)	8,773	351	75	0	426	4.86%
Orange (NE)	4,870	46	8	0	54	1.11%
Wallingford (NE)	17,306	607	330	37	974	5.63%
West Haven (E)	22,336	2,329	398	0	2,727	12.21%
Woodbridge (NE)	3,189	36	4	0	40	1.25%

\* NE = Non-Exempt Municipalities

\*\* E = Exempt Municipalities

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

The South Central Connecticut Council of Governments and its member municipalities have formed a Regional Housing Choice Task Force to work to identify regional solutions to providing Fair Housing Choice. To date, the focus has been on data collection and market analysis of the region. An implementation plan is also underway. It is anticipated that this group will discuss regional housing issues and needs and work to find collaborative regional solutions. The City provides representation on the Regional Housing Task Force.

**Impediment:** There is a need to encourage regional solutions to the provision of affordable housing choice and supportive housing options for persons with special housing needs.

**Recommendations:** The City should continue its active involvement regional Fair Housing planning efforts and housing strategy implementation with the South Central Connecticut Regional Council of Governments

**Impediment:** There is a need to continue to provide housing choice for all residents through the support and development of new housing units in a variety of configurations.

**Recommendation:** To ensure a variety of housing exists to provide choice for all, ownership and rental; market-rate and affordable; and permanent supportive options should be supported and pursued as determined feasible by market conditions. The support and encouragement of new housing development should be balanced with the need for regional solutions to fair housing choice and the need for a balance of economic and housing growth within the City.

**Impediment:** There is a need to continue to expand the availability of housing of all types to make housing available to all persons regardless of need.

**Recommendation:** Continue to support programs and services that create and preserve housing units as well as programs that provide housing support services to ensure persons are able to maintain and remain in their homes.

## 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. The neighborhood specialists in LCI reflect the demographic make-up of the community and the neighborhoods they serve providing multi-lingual outreach and education to the city's various neighborhoods.

### **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

Sustainable Transportation Systems: New Haven is growing both as a regional center and as a city of global significance. With over 11 million s.f. in new development and over 3,000 new residential units, the 2010 Census will likely indicate a resident population over 130,000. Public transit, pedestrian and bicycle access and the “complete street” are at the very heart of the new economy. The next five to ten years will be a period of intense urban development and the City’s transportation system likewise must relate to the 21<sup>st</sup> century economy.

The City is therefore focusing on the New Haven Sustainable Transportation Framework, which includes very strategic actions over this critical five- to ten-year period. The framework addresses the core elements that contribute to a sustainable transportation network—Safety, Mobility, Vibrant Streets, and Infrastructure. These elements are interrelated and focus on the long-term growth, livability and environmental performance of the City. The framework is much more than an infrastructure schedule; it links *people* to each other and their destinations and provides a depth of choice for each person, regardless of income.

The City works closely with the Connecticut Department of Transportation (DOT) on major transportation initiatives including road/highway improvements, airport enhancements, bike/pedestrian initiatives and transit programs.

With the dedication of many community partners, the City launched the “Street Smarts” traffic safety campaign in October, 2008. The campaign is one of the three major City initiatives intended to improve traffic safety in New Haven through community outreach/education, physical improvements to roadways, and cooperative enforcement efforts with the New Haven Police Department. Street Smarts is reaching motorists, cyclists, and pedestrians, calling for attentiveness at all times; patience with others; and a willingness to share the road with all users.

In keeping with the overall City commitment to a safe and civil traffic program, the New Haven Board of Aldermen approved the landmark Complete Streets legislation for the City in 2008. This legislation promotes the safety and convenience of all users of the transportation system using a Complete Streets hierarchy of users, which begins with pedestrians, bicyclists, and transit users. Likewise, the City made several roadway improvements in 2008 which promotes a Complete Streets environment.

The City is a leading promoter of the City’s first new major north-south bus route connecting City Point with Dixwell Avenue in Hamden. If approved and initiated the new Cross Town West bus

route will have an immediate impact on service delivery as connections to existing routes can be achieved without a Downtown transfer.

Working with ConnDOT and SCRCOG, the City helped develop a new Downtown – Union Station circulator, which provides free service between the Downtown, Medical District and Union Station triangle. All of these efforts promote access to jobs for residents in the City's disadvantaged neighborhoods.

The City's signature effort is a once-in-a-generation opportunity to reconnect neighborhoods and provide new economic development opportunities through the conversion of the Route 34 corridor to a community-scale urban boulevard. To accomplish this goal, the City has introduced a comprehensive program of land use, transportation, and environmental enhancements designed to encourage a more sustainable and transit-oriented land use pattern.

Efforts are underway by the City, State, and SCRCOG to increase the transit ridership along the New Haven-Hartford-Springfield Commuter Rail line by increasing the frequency of trains. Besides the expanded travel option to Hartford and Springfield, this enhanced 62-mile line would improve air quality, provide the opportunity to travel from New Haven to Springfield in about an hour without using a car, provide a train connection to Bradley International Airport, and passenger service for 15 hours a day at the start-up stage, along with multi-modal integration with bicycles (current Amtrak trains do not allow them) and vastly improved station stops.

Tweed New Haven Airport is one of just two Class I facilities in Connecticut providing both scheduled commercial and general aviation services. Tweed ranks 11th among all New England regional airports for total scheduled boardings. US Airways is currently the primary commercial service provider at the Airport. For many years, the City and Tweed New Haven Airport Authority have worked to enhance commercial service and position Tweed as a small regional airport with service from several commercial carriers.

In 2008, the New Haven Port Authority welcomed its first Executive Director who worked extensively with the DOT and the port terminals to re-establish the Waterfront Street Railroad to the pier at New Haven Terminal. Additional work is planned, which will allow for fully-integrated rail access for all of the deepwater terminals. In addition, the Port Authority gained aldermanic authorization for auto export activities (should the market improve) and again pitched the Transportation Strategy Board for pilot funding to initiate a feeder barge service between New Haven and the Port of New York and New Jersey.

The DOT is also currently working with the City Plan department to implement the last phase (fourth) of the Farmington Canal Greenway trail in the City that connects the downtown area to Long Wharf thus providing opportunities for non-motorized transportation for the residents.

Besides the above-described transportation and multi-modal initiatives, there is also a continued need to pursue expanded para-transit services across the City for the elderly and the disabled, and to regularly identify and fill the gaps in the jobs/transit connections.

**Mass Transportation:** The need for improved mass transportation both within the City and within the region is often discussed. Efforts to diffuse minority and lower income households and decentralize affordable housing require that mass transportation be more widely available with better headways and connections. Although commuter rail services have and are increasing (with mature services along the shoreline and proposed services inland), the public bus system faces both financial and operational problems. 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. Improved bus service is needed to better connect inner city neighborhoods with employment destinations throughout the City as well as in surrounding suburban communities. Rail and bus system improvements, as well as a system of better commuter parking improvements would be marked improvements to the City's and the region's mass transportation system.

**Impediment:** There is a need to develop improved mass transportation options and linkages both within the City and throughout the region in order to provide better access to housing choice, employment options and services.

**Recommendation:** As employment centers grow in the suburbs, mass transportation services are significantly less frequent. This adversely affects city residents who do not have access to their own vehicle. In addition, many of the city's elderly and disabled residents do not have access to the mass transportation system and rely solely on point-to-point paratransit service. The City of New Haven seeks the development of more transportation options to expand regional employment opportunities. This can be accomplished through the creation of a north/south bus route to reduce the travel time between major employment destinations on Route 1 in the western suburbs and Route 10 in Hamden, as well as Southern Connecticut State University.

**Recommendation:** Work with the Connecticut Department of Transportation and others in developing system improvements. Some of the efforts that have been recommended include:

- Establishing transportation demand management (TDM) programs with all major employers. TDM programs reduce the cost of commutation for pedestrians, bicyclists and transit users through financial incentives.

- Initiating a Downtown/Union Station and Medical District Circulators. The first of these two routes is complete and provides a free connecting service between Union Station and Downtown. The second route to the medical district is just as important as new construction continues around the Yale New Haven Hospital area. Over 1,000 jobs are proposed for a new building at 100 College Street which currently lacks public access to the train station.
- Expanding State Street Station service with hourly service frequency on the New Haven Line and the Hartford-Springfield-New haven commuter line. State Street Station is located at the border of the Down town and Wooster Square neighborhoods. As more and more residents locate close to the center of the city, State Street Station is well within walking distance to their homes and, in turn, to the major regional employment centers at Stamford, New York City and Hartford.
- Augmenting multi-modal connections with the public transportation system, especially bike-to-transit. Especially advocating for bike racks on every city bus and expanding bike parking.
- Introducing car sharing to the community at large. The cost burden of an automobile would be substantially reduced if car ownership is shared. The City of New Haven is seeking to broaden their car sharing program (similar to the one at Yale University) so memberships and cars are more readily available in the neighborhoods.
- Promotion of more non-motorized transportation solutions (such as bike routes) for City residents.

**Impediment:** There is a need to promote the economic and educational advancement of all individuals.

**Recommendation:** One of the greatest impediments to housing choice is the lack of financial resources or ability to afford housing in a particular configuration or location. In an attempt to provide individuals with greater choice and access to the city should support and promote programs, activities and policies that encourage improvements in education, job training and skill development. Efforts to expand employment opportunities and increase earning potential will also be supported and given high priority.

## 5. Public Housing Admissions Procedures

As of July 2010, the following Housing Authority of New Haven (HANH) public housing waiting lists are open:

- **Elderly Developments**
- **Elderly/Disabled Developments**
- **ADA/UFAS Accessible Housing**
- **Site Based (Family) Developments – 4 and 5 bedrooms only**
- **Farnam Courts – 3 and 4 bedroom only**

There are 4,426 applicants on HANH's family waiting list, 91 on the accessible unit waiting list, and 2,603 applicants on one or more elderly/disabled waiting lists.

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 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 has the following preferences or priorities for public housing admissions:
  - Displaced Persons
  - Documented victims of domestic violence, dating violence or stalking.
- 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*** - 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*** - 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 elderly/disabled development open to elderly and disabled applicants. Applicants may apply for positions on up to 3 site-based waiting lists.
- c) Site-based waiting lists for each family development. Applicants may apply for positions on up to 3 site-based waiting lists, when the lists are open.

Each waiting list is further broken down by bedroom size.

Applicants may concurrently hold positions on up to 3 site-based Family or Elderly/Disabled waiting lists or the Accessible Housing Waiting list, and any Housing Choice Voucher (HCV) Section 8 waiting lists.

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

- a). Elderly Only - Projects designated for Elderly families:<sup>1</sup> Elderly families will receive a priority for admission to units or buildings which may be approved for designated elderly housing by the U.S. Department of Housing and Urban Development (HUD). When elderly only is exhausted, near elderly can be admitted.

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<sup>1</sup> Buildings or portions of buildings designated by Following HUD's requirements. Elderly only are families which include persons 62 or older.

b). Accessible Housing – HANH maintains a percentage of units in its portfolio that are UFAS-compliant (i.e. wheelchair accessible). Priority for these units shall be given to families with one or more members who require such features.

c). Continuum for Success – Supportive Housing Matching Program- HANH is authorized under its Moving to Work status to develop and adopt a voluntary program for all of its properties that matches housing with health, social services and/or economic development programs tailored to each resident’s opportunity to become self sufficient. In carrying out this program HANH may assign individual or blocks of units. Priority of units designated under this program will be given to eligible HANH residents and income eligible applicants referred by supportive service agencies pursuant to an agreement with HANH to provide such supportive services.

d). Community Re-entry Pilot Program – limited to 12 admissions at any one time. HANH is authorized under its Moving to Work Annual Plan to develop and implement a pilot program to increase housing choice and support family self-sufficiency. HANH admits a limited number of offenders who are returning to New Haven provided they meet the special eligibility requirements outlined by HANH. Applicants for the community re-entry pilot program will be screened for suitability for housing by reviewing compliance with probation and/or parole, employment or educational programs and treatment and case management plans.

***Placement on Waiting Lists*** - 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*** - 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 the Admissions and Continued Occupancy Policy (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.

- 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 interview except when there are extenuating circumstances.
- 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.
- 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 the Admissions and Continued Occupancy Policy.
  - Unit size requirements.
- Applicants determined to be ineligible for housing at HANH will be promptly notified and will receive a Notice of Rejection/Withdrawal from HANH stating the basis for the 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.
- 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.



3. 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.

4. 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***

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.

4. Those where at least one member of the household is either a citizen or eligible non-citizen.

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.

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.

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*** - 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 not receive more than two (2) offers per waiting list. An applicant must accept or reject the offer within 7 days of the date they are shown the apartment. If both offers are rejected or the applicant does not respond, the applicant will be removed from that specific site-based waiting list and may at a later date reapply to that specific site-based waiting list if desired. The removal from the specific site based waiting list will not affect their placement on the Section 8 list or another site-based waiting list.

***Admission to HANH Scattered Site Units***

HANH's policy gives preference to internal transfers, and the demand by current public housing families for our scattered site units is high. 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 as stated in the Admissions and Continued Occupancy Plan (ACOP). 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*** - 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. 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 the earliest application date. A resident who does not have a disability will agree in writing to relocate to another unit when a person with a disability requires the unit.

HANH's procedures related to transfers to or from an accessible unit are provided in HANH's ACOP:

1. *Residents Who Need an Accessible Unit* - HANH residents in need of an accessible unit may apply to be placed on the HANH transfer list, subject to verification of the resident's need for accessible features or reasonable accommodation. Once verification has been received, the resident will be given a Reasonable Accommodation preference. 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.

**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 the 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 the 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**

As a result of HANH's analysis of (1) the number and proportion of Limited English Proficiency (LEP) persons serviced or encountered in HANH's eligible service population, and (2) the frequency with which LEP individuals come into contact with HANH's programs, HANH has determined that HANH has particular obligations to ensure effective communication with Spanish-speaking persons.

Accordingly, it is HANH's policy that HANH will provide bilingual Spanish-speaking staff as necessary to provide oral language/interpreter services for Spanish-speaking LEP applicants, residents, or other members of the public interested in HANH's services.

It is HANH's general policy and firm belief that we can operate our public housing program most effectively by ensuring effective communication with applicants and residents. Accordingly, HANH has prepared Spanish translations of many resident policies, and HANH will continue to expand its Spanish translation of policies and procedures.

### **HANH Assistance for LEP Persons Who Speak another Language**

It is HANH's aim to ensure that our programs are accessible to all persons, regardless of national origin or other protected class, including persons with LEP. HANH will provide reasonable language services necessary to ensure effective access by LEP persons. In determining the language services to be provided, including oral language/interpreter services, as well as written language/translation services, HANH will evaluate on a case-by-case basis the following four factors:

- a. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program;
- b. The frequency with which LEP persons come into contact with the program;
- c. The nature and importance to people's lives of the program, activity, or service provided; and
- d. The costs and resources available.

### **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 July 2010 occupancy, Black non-Hispanic households occupy 68% of HANH public housing units, Hispanic households occupy 23%, 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**

Development	Total Households	Number Black Non-Hispanic	Number Hispanic	Number White Non-Hispanic	Number Other Race	% Black Non-Hispanic	% Hispanic	% White Non-Hispanic	% Other Race
Essex Townhouses (F)	30	18	11	1	0	60.00%	36.67%	3.33%	0.00%
Eastview Terrace (F)	53	36	14	3	0	67.92%	26.42%	5.66%	0.00%
Quinnipiac Terrace (F)	114	67	42	3	2	58.77%	36.84%	2.63%	1.75%
Fairmont Heights (E/D)	91	54	20	17	0	59.34%	21.98%	18.68%	0.00%
Ruoppolo Manor (E/D)	97	47	30	20	0	48.45%	30.93%	20.62%	0.00%
K Harvey Terrace (E/D)	16	10	5	1	0	62.50%	31.25%	6.25%	0.00%
P Bush Mall (E/D)	55	46	7	2	0	83.64%	12.73%	3.64%	0.00%
CB Motley (E/D)	43	37	3	3	0	86.05%	6.98%	6.98%	0.00%
William T. Rowe (E/D)	50	36	6	7	1	72.00%	12.00%	14.00%	2.00%
Winslow-Celantano (E/D)	57	30	15	12	0	52.63%	26.32%	21.05%	0.00%
Farnam Courts (F)	225	129	83	12	1	57.33%	36.89%	5.33%	0.44%
County & Henry (F)	6	4	2	0	0	66.67%	33.33%	0.00%	0.00%
Robert T. Wolfe (E/D)	74	46	19	9	0	62.16%	25.68%	12.16%	0.00%
McQueeney Tower (E/D)	101	52	21	27	1	51.49%	20.79%	26.73%	0.99%
McConaughy Terrace (F)	156	120	24	11	1	76.92%	15.38%	7.05%	0.64%
Valley Townhouses (F)	37	32	5	0	0	86.49%	13.51%	0.00%	0.00%

Waverly Townhouses (F)	47	35	8	4	0	74.47%	17.02%	8.51%	0.00%
Crawford Manor (F)	94	63	15	16	0	67.02%	15.96%	17.02%	0.00%
Val Macri Court (E/D)	11	5	6	0	0	45.45%	54.55%	0.00%	0.00%
Westville Manor (F)	119	94	19	6	0	78.99%	15.97%	5.04%	0.00%
Ribicoff Cottages (E/D)	35	30	1	4	0	85.71%	2.86%	11.43%	0.00%
Ribicoff Extension (E/D)	45	37	4	3	1	82.22%	8.89%	6.67%	2.22%
Scattered Site (F)	167	121	43	3	0	72.46%	25.75%	1.80%	0.00%
Monterey Place (F) (E/D)	267	212	36	18	1	79.40%	13.48%	6.74%	0.37%
<b>Totals</b>	<b>1,990</b>	<b>1,361</b>	<b>439</b>	<b>182</b>	<b>8</b>	<b>68.25%</b>	<b>22.59%</b>	<b>8.81%</b>	<b>0.35%</b>

“E/D” = Elderly/Disabled Development

“F” = Family Development

Almost half (49%) of HANH’s public housing households report having a family member with a disability.

### Section 8

As of July 2010, among households using HANH Section 8 vouchers, 54% are Black non-Hispanic, 34% are Hispanic, and 11% are white non-Hispanic. Roughly one third (34%) 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 is currently using a private property management company, which offers free mobility counseling to participants. The attached tables identify voucher distribution within New Haven.

Voucher Distribution within New Haven Census Tracts

Census Tract	Number of Vouchers	Percent of Total New Haven Vouchers
	14	0.46%
1401	118	3.91%
1402	15	0.50%
1403	81	2.68%
1404	127	4.21%
1405	137	4.54%



1406	187	6.19%
1407	297	9.83%
1408	122	4.04%
1409	151	5.00%
1410	16	0.53%
1411	35	1.16%
1412	101	3.34%
1413	107	3.54%
1414	123	4.07%
1415	206	6.82%
1416	131	4.34%
1417	5	0.17%
1418	40	1.32%
1419	12	0.40%
1420	5	0.17%
1421	25	0.83%
1422	5	0.17%
1423	152	5.03%
1424	158	5.23%
1425	170	5.63%
1426.01	205	6.79%
1426.02	137	4.54%
1427	113	3.74%
1428	23	0.76%
1541	1	0.03%
1805	1	0.03%
<b>Grand Total</b>	<b>3020</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 are 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 distributes an apartment listing which includes accessible apartments. 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. 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.

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

## **9. 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. Staff continues to meet with the providers and other partners on a monthly basis to discuss the progress and any concerns that may arise. Since its inception, the Continuum for Success has produced concrete results:

- (1) the development of four on-site Supportive Housing programs in our elderly/disabled developments
  - the Matthew Ruoppolo Supportive Housing Program,
  - the George Crawford Manor Supportive Housing Program
  - the Robert T. Wolfe Supportive Housing Program
  - the Charles T. McQueeney Supportive Housing Program
- (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 Housing Choice Voucher (HCV) 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 HCV landlords.

## **10. 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.

HANH has expanded its supportive housing program to three additional developments: Robert T Wolfe, an elderly/disabled building of 93 units with 25 slots; Charles T McQueeney, an elderly/disabled building of 150 units with 30 slots; and George Crawford Manor, an elderly/disabled building of 109 units with 25 slots.

HANH plans to expand these services to one additional development during FY 2010-2011.

### **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 build a 47 unit assisted living facility at 122 Wilmot Road. This will be a part of the West Rock Redevelopment Project. The lower floor will include a pharmacy, health care facility and a convenience store for residents. Construction is slated to begin the winter of 2011.

### **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**

***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 \$674 total benefits. Fair Market Rent in New Haven is \$978 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 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. Fifty-two units in the five partially elderly designated developments meet Uniform Federal Accessibility Standards (UFAS) and remain available to both elderly and non-elderly disabled persons needing accessible units. Priority for these 52 units shall be given to persons that are mobility impaired.
- 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. The Housing Authority has also addressed the issue of poor security at the developments by hiring extra duty police officers at some developments and security guards and building attendants at other developments. The Housing Authority has also installed security cameras at the various developments.
- 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 with various providers, 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.

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. 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.

3. Additional loans and tax relief are needed as incentives to make current housing accessible. A program which provides qualified landlords with resources to help them 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 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.
  
4. 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. For instance, the Housing Authority has created an Accessible waiting list for families that need



an accessible unit. Although, the various site-based family waiting lists are closed, the Accessible waiting list and the Elderly/Disabled waiting lists remain open. The Housing Authority also conducts affirmative marketing to inform eligible families about the availability of accessible units in its public housing developments and has committed to rehabilitating units that meet the Uniform Federal Accessibility Standards (UFAS) and American with Disabilities Act (ADA) standards.

5. 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.
6. 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. The Housing Authority currently administers 80 SRO vouchers for homeless individuals.
7. 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.
8. Alternative housing initiatives such as shared housing, mutual housing and cooperative housing will be explored as appropriate to increase the range of housing options available.
9. No comprehensive listing of accessible housing is available from any source in Connecticut. Housing Authority listings of private rental units may indicate some accessible units, when available, but this depends upon self-reporting by private landlords. 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. The State has begun compiling a list of all accessible units in Connecticut. However, New Haven is not yet on the searchable list. Despite efforts by the Department of Services for Persons with Disabilities to gain information from federally subsidized housing management companies and the State office of HUD, they continue to wait for a

response. The Department has also made initial contact with DECD to ensure that New Haven is included in any listing of accessible housing.

**Impediment:** There is an insufficient supply of accessible units for persons with disabilities. The City of New Haven must continue promoting and supporting actions to increase the supply of accessible housing.

**Recommendation:** Work with the Housing Authority of New Haven (HANH) to better accommodate people with disabilities. Several steps can be taken by the City Of New Haven in cooperation with the Housing Authority to meet the needs of the disability community. Some of the steps include:

- Maintain regular meetings of the newly-formed disability committee comprised of advocates and residents. This committee should meet quarterly to review the HANH's progress in serving those with disabilities.
- Continue to keep the waiting list open for those who are in need of accessible housing. In addition, reach out to the disability community and inform them of the variety of options they have.
- Evaluate all HANH apartments and determine which units are accessible and which units can be made accessible.
- Evaluate and identify which accessible units are being rented by persons not in need of accessible units and move those persons to other units.
- Continue to communicate with the Department of Disability Services regarding accessible units and the needs of the disability community.
- Maintain and continue to update the list of accessible Section 8 units and assist Section 8 voucher recipients with needs assessment and finding accessible units.
- Assist landlords if they wish to make their housing units accessible to Section 8 tenants.
- Continue to provide transportation assistance to assist people who are looking for accessible housing
- Continue to create and provide incentives for landlords to construct wheelchair accessible housing since these units are generally more expensive to construct and have higher rents.
- Increase the percentage of accessible units built with every newly constructed unit.

**Impediment:** There is a need to provide improved outreach and communication with the disability community.

**Recommendation:** Keep lines of communication open between the City, particularly the Department of Disability Services, LCI, and the Fair Housing Office, HANH and other disability focused organizations regarding accessible units and the needs of the disability community.

**Recommendation:** Continue to track and address calls from the disability community related to housing and divide them into various categories such as to allow for potential impediment analysis:

- Calls with questions regarding fair housing and landlord responsibilities
- Calls from constituents who think they have been discriminated because of their disability.
- Calls regarding funding for retrofitting for accessibility for homeowners and tenants in the City of New Haven.
- Calls from constituents wanting information on subsidized housing and accessible units in their areas.

**Impediment:** There is a need to continue to develop a dynamic and comprehensive list of accessible housing.

**Recommendation:** Draft a list that contains all the accessible housing in the New Haven area. The document should contain property names, types, and addresses for all wheelchair accessible housing in the New Haven area. Outreach to housing providers, state agencies and HUD as well as collaborations with the HANH, the regional planning agency and adjacent municipalities will help to ensure the list is comprehensive and up to date.

**Impediment:** There is a need to continue to provide housing resource information and technical assistance to persons with disabilities and housing providers.

**Recommendation:** The Department of Disability Services and HANH should continue to maintain and display housing resource information in areas easily visible by residents and constituents. Pamphlets and brochures currently available to the disability community in the Department of Disability Services cover areas such as:

- Fair Housing for individuals with a source of income.
- Fair Housing for individuals with physical disabilities.
- Housing Discrimination related to Title VI rights.
- Listing of wheelchair accessible units in New Haven and surrounding towns.
- Listing of apartments from the Housing Authority of New Haven that are

currently accessible or will be made accessible in the future.

- Listing of subsidized housing in New Haven with an indication of which have accessible units.

**Impediment:** There is a need to improve outreach to the disability community about housing information.

**Recommendation:** The Disability Services Department, jointly with the Continuum of Care Collaborative has held Housing Resource Forums in 2003, 2006, and 2010. More Housing Resource Forums should be held for service providers in order to better serve a variety of constituencies including individuals with disabilities. Preparation for the Housing Resource Forum entails updating a Human Resource Booklet, which lists emergency, transitional, respite, supporting and subsidized housing resources in the New Haven area, along with housing benefit programs.

**Impediment:** There is a need to improve coordination between groups serving those with disabilities.

**Recommendation:** Support and advocate other initiatives not directly done by the City of New Haven that bring positive change to the disability community. Some of these initiatives include:

- The Assistant Coordinator of the Department of Disability Services routinely assists a non-profit organization called “No Closed Doors” (NCD) assisting in the development of a training curriculum which will address housing, benefits, disability and employment.
- The Assistant Coordinator of the Department of Disability Services also participates in the Continuum of Care, specifically on the membership committee.
- The Director of the Department of Disability Services serves on the State of Connecticut Long Term Care Advisory Council which monitors the state’s policies and actions that may affect how individuals with disabilities reside in their communities. . Initiatives include streamlining community based services that enable individuals to remain in their homes longer, in-depth statewide needs assessments, supporting legislation that will make homes easier to visit and opposing legislation that would reduce accessibility requirements in new multi-family construction.
- *Money Follows the Person (MFP)* - a state-run, federally funded program which provides for RAP certificates and assistance to disabled to move back into the community from nursing of skilled facilities pursuant to the decision under the Americans with Disabilities Act called Olmstead v. L.C.

- *Choices* – a program for individuals with a disability and/or are elderly, through the Agency on Aging of South Central Connecticut, to assist them with resources that will enable them to remain in the community.

## 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 2009 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 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 - 2009**  
**Conventional Home Purchase Loan Statistics by Census Tract**  
**Report Date: 05/2010**

Census Tract	Loans Originated	Approved, Not Accepted	Denied	Withdrawn	Closed for Incompleteness
1401	4	-	9	-	-
1402	-	-	-	-	-
1403	1	-	2	-	-
1404	2	1	1	3	-
1405	1	-	3	3	-
1406	-	1	7	3	1
1407	1	-	2	-	-
1408	5	1	1	1	1
1409	5	1	1	2	2
1410	23	1	3	5	-
1411	17	-	6	4	-
1412	12	3	5	3	2
1413	7	-	-	2	-
1414	20	2	4	2	-
1415	5	1	2	2	-
1416	3	2	2	2	1
1417	1	-	-	1	1
1418	14	1	2	2	-
1419	30	3	1	8	2
1420	16	1	4	1	-
1421	3	-	1	-	1
1422	16	2	5	2	-
1423	8	2	6	-	-
1424	7	-	7	1	1
1425	5	-	1	4	-
1426.01	5	-	6	1	2
1426.02	15	2	3	-	-
1427	5	-	2	3	-
1428	24	1	6	3	2

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's 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. Under the Fair Housing Program the City undertakes efforts to educate community agencies, social and political leaders, and community residents on the issues surrounding fair housing. Activities to promote and enforce fair housing by the Fair Housing Program Officer 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 Fair Housing Office 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 Fair Housing Office, LCI, in association with non-profit housing providers and local community development corporations, offer homeownership seminars, foreclosure prevention assistance, and a variety of programs in support of the creation or maintenance of affordable housing. LCI incorporates fair housing and anti-discrimination requirements as part of its various programs and program agreements. 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.

**Impediment:** There is a need to continue to provide education and community outreach regarding Fair Housing requirements, laws, regulations and procedures.

**Recommendation:** Continue to provide information to the community via a variety of formats including printed media, pamphlets and booklets, web postings, seminars, advertisements, community meetings and individual consultation. Information should be provided in formats and languages reflective of community need and audience. At a minimum, due to the percentage of Spanish-speaking population in the City information should be provide in Spanish as available.

**Impediment:** There is a need for improved recordkeeping and coordination.

**Recommendation:** In order to better track accomplishments and efforts undertaken to further fair housing choice and to streamline complaints and referrals, a coordinated process should be developed to improve communication and recordkeeping between City agencies and

departments, the housing authority, HUD, DECD, non-profit housing and service providers,

### **3. Expansion of Housing Choice**

As brought forth during the needs assessment update process undertaken as part of the preparation of the Consolidated Plan: 2010-2014, there is a need for housing for former offenders released from incarceration. Shelter providers and parole/probation officers need to work more closely together to identify appropriate housing plans for ex-offenders who end up in shelters.

Launched in 2008, the City of New Haven's Prison Reentry Initiative works with community partners, state agencies and other reentry stakeholders to support the reintegration of formerly incarcerated residents into the New Haven community. Over the next several years, the Initiative will expand its work through a Community Empowerment Program, designed to support and enhance the potential of the individuals, families and communities. The City's Prison Reentry Initiative has begun working with the Housing Authority of New Haven to design and implement a pilot transitional housing program for formerly incarcerated New Haven residents, as part of New Haven's participation in the Moving to Work demonstration program. The pilot housing program will provide case management and employment assistance to participating individuals.

"Reentry" generally refers to the return of incarcerated individuals to their communities from prison, parole or probation. Reentry programs and services, aim to discourage recidivism and seek to ensure that former inmates make a successful transition back to their respective communities. Former inmates frequently return to society in a state of profound deprivation with regard to almost every area of their lives, from basic needs like housing, clothing and food to employment, healthcare, education and voting rights. Despite the many challenges that inmates face in reconstructing almost every aspect of their lives, studies show that inmates nationwide are often released from prison with little or nothing in the way of adequate discharge plans, leading to increased recidivism rates and parole violations.

**Impediment:** There is a need to provide housing and support programming to assist recently incarcerated, paroled and other recently discharged individuals in obtaining and maintaining appropriate permanent housing.

**Recommendation:** Support efforts by the Prison Re-Entry program, the HANH and the New Haven Continuum of Care Network of Providers, or other supportive housing and service providers to assist individuals in need to find and maintain appropriate housing.

## **E. 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.
- 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 educational, skill development and employment opportunities within the City particularly for minorities and other protected classes.
- Provide programs which address foreclosure and its associated impacts of eviction, homelessness and property abandonment.
- Support efforts by HANH to provide housing choice to lower income residents of the City.
- Continue to encourage the creation of affordable rental units within City neighborhoods to provide housing choice for City residents.
- Continue to encourage homeownership in a variety of configurations 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.
- 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.
- 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.
- Work to develop programs to assist the difficult to house, such as individuals recently released from prison, detox centers or other similar environments in order to increase their capacity to access and maintain permanent 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**