



Affirmatively Furthering Fair Housing:

What Does it Mean to “Overcome” Impediments to Fair Housing Choice?

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Separate is Unequal

- Poor Housing
- Failing Schools
- Disconnection from Employment
- Inadequate Transportation
- High Crime
- Poor Health Outcomes
- Diminished Social Capital
- Declining Home Equity



Segregation Sets Communities Up for More Abuse

- Steering
- Blockbusting
- Redlining
- Predatory Lending
- Equity Stripping
- NIMBYism
- Where to disinvest
- Where to Gentrify?
- Discriminatory zoning
- Discriminatory building standards
- Discriminatory refusal of municipal services
- Environmental racism



HUD Proposed AFFH Rule

- Existing Rule in Effect Since 1994
 - Broad Requirements
 - Details in *Fair Housing Planning Guide*
 - Enforcement Episodic
- Proposed Rule (July 19, 2013)
 - Specific Requirements, Driven by Data
 - HUD Guidance Forthcoming
 - Front-End Review and Enforcement Robust
 - Stronger Public Participation Requirements



Existing AFFH Rule



AFFH Statutory Authority

- FHA requires HUD to “administer [housing] programs...in a manner affirmatively to further the policies of [the Fair Housing Act],” including the general policy to “provide, within constitutional limits, for fair housing throughout the United States.”
 - 42 USC §3608(e)(5).



“No Certification, No Money”

- 42 U.S.C. §5304(b)(2): “Any grant under [the CDBG program] shall be made only if the grantee certifies to the satisfaction of the Secretary that ... the grant will be conducted and administered in conformity with the Civil Rights Act of 1964 [42 U.S.C. 2000a et seq.] and the Fair Housing Act [42 U.S.C. 3601 et seq.], and the grantee will affirmatively further fair housing.”



Preventing the Increase of Segregation

- “...the affirmative duty placed on the Secretary of HUD by § 3608(d)(5)... requires that consideration be given to the impact of proposed public housing programs on the racial concentration in the area in which the proposed housing is to be built. **Action must be taken to fulfill, as much as possible, the goal of open integrated residential housing patterns and to prevent the increase of segregation, in ghettos, of racial groups whose lack of opportunities the Act was designed to combat.**”
 - *Otero v. New York City Housing Authority*, 484 F.2d 1122, 1134 (2d Cir. 1973).



Refraining From Discrimination is Not Enough

- “...every court that has considered the question has held or stated that Title VIII imposes upon HUD an obligation to do more than simply refrain from discriminating (and from purposely aiding discrimination by others)...This broader goal [of truly open housing] ... reflects the desire to have HUD use its grant programs to assist in ending discrimination and segregation, to the point where the supply of genuinely open housing increases.”
 - *NAACP v. Sec’y of Housing and Urban Development*, 817 F.2d 149, 155 (1st Cir. 1987).



Reports Required by HUD from “Entitlement Jurisdictions”

- Consolidated Plan
- Annual Action Plan
- Consolidated Annual Performance and Evaluation Report (CAPER)
- Analysis of Impediments to Fair Housing Choice (AI)

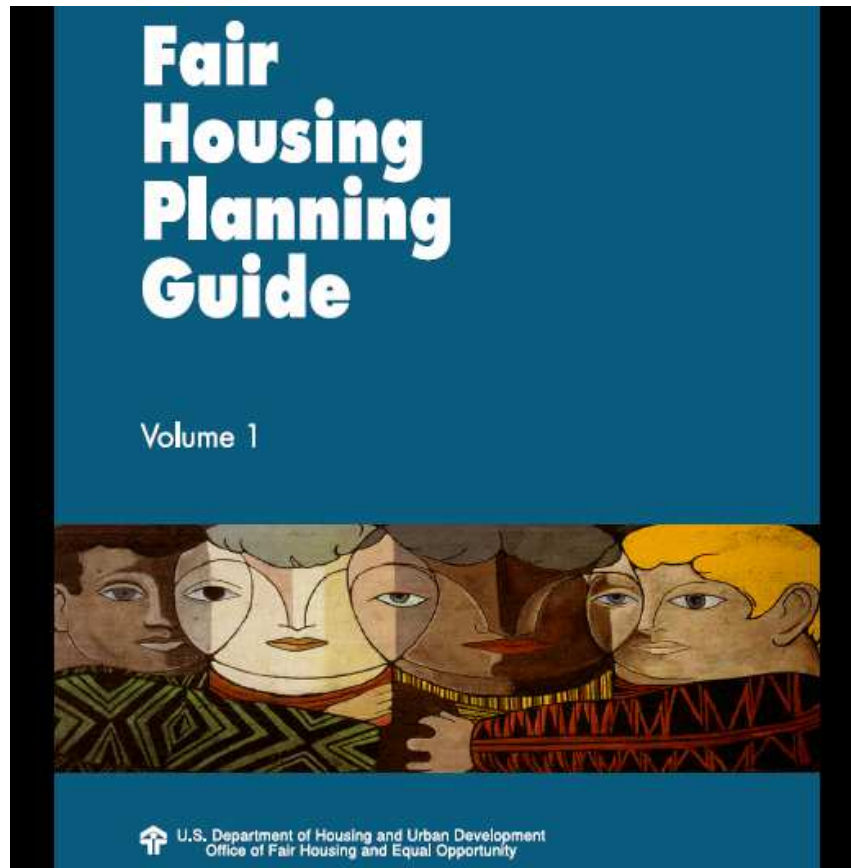


CDBG/Con Plan AFFH Regs

- A grantee is “required to submit a certification that it will affirmatively further fair housing, which means that it will (1) conduct an analysis to identify impediments to fair housing choice within the jurisdiction; (2) take appropriate actions to overcome the effects of any impediments identified through that analysis; and (3) maintain records reflecting the analysis and actions in this regard.”
 - 24 C.F.R. § 570.601(a)(2)
 - 24 CFR § 91.225(a).

HUD's

Fair Housing Planning Guide





Obligations Apply to All Funds

- “Although the grantee’s AFFH obligation arises in connection with the receipt of Federal funding, its AFFH obligation is not restricted to the design and operation of HUD-funded programs at the State or local level. The AFFH obligation extends to all housing and housing-related activities in the grantee’s jurisdictional area whether publicly or privately funded.”
 - *Fair Housing Planning Guide* (1995), at p.1-3.



HUD Block Grant Allocations

OR-FY13 Allocations

KEY	CNSRTKEY	NAME	STA	CDBG13	HOME13	HOPWA13	ESG13
410012		Albany	OR	\$402,361	\$0	\$0	\$0
410042		Ashland	OR	\$169,591	\$0	\$0	\$0
410108		Beaverton	OR	\$551,016	\$0	\$0	\$0
410114		Bend	OR	\$410,006	\$0	\$0	\$0
410288		Corvallis	OR	\$493,675	\$271,256	\$0	\$0
410426	41C033	Eugene	OR	\$1,242,049	\$945,813	\$0	\$0
410564		Gresham	OR	\$900,954	\$0	\$0	\$0
410636		Hillsboro	OR	\$675,729	\$0	\$0	\$0
410888		Medford	OR	\$567,833	\$0	\$0	\$0



HUD Block Grant Allocations

OR-FY13 Allocations

KEY	CNSRTKEY	NAME	STA	CDBG13	HOME13	HOPWA13	ESG13
411098	41C032	Portland	OR	\$8,163,351	\$2,922,106	\$1,035,226	\$561,868
411200	41C212	Salem	OR	\$1,253,852	\$613,007	\$0	\$0
411290		Springfield	OR	\$479,568	\$0	\$0	\$0
419005		Clackamas County	OR	\$2,047,968	\$741,398	\$0	\$142,472
419051		Multnomah County	OR	\$313,153	\$0	\$0	\$0
419067	41C213	Washington County	OR	\$1,874,936	\$1,097,787	\$0	\$134,781
419999		Oregon Nonentitlement	OR	\$12,178,221	\$6,110,481	\$363,787	\$1,368,385



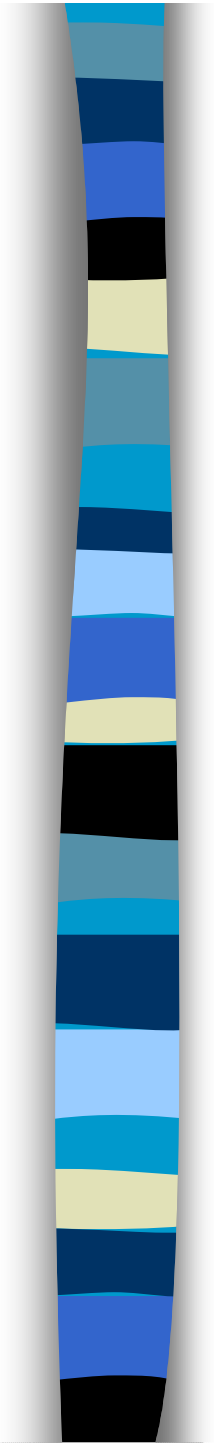
Urban County Consortium Option

- Counties that have elected “Urban County” status administer program for smaller municipalities that opt into the Consortium:
 - Clackamas County
 - Multnomah County
 - Washington County
- County and municipality enter into a Cooperation Agreement



Urban County Cooperation Agreement

- 6a. The County and Cooperating Municipality will take all required action to comply with the provisions of Title VI of the Civil Rights Act of 1964, the Fair Housing Act of 1968 and the Americans with Disabilities Act of 1990 to assure compliance with the certification required by Section 104(b) and 109 of Title I of the Housing and Community Development Act of 1974 as amended, and other applicable laws. Accordingly, the Cooperating Municipality agrees to do what is necessary, as determined by the County, to comply with each of the above referenced Acts, the rules and regulations thereunder, and the undertakings and assurances in the application form insofar as they relate to the activities and programs conducted by the Cooperating Municipality pursuant to said grant. Further, **the County is prohibited from expending Urban County funding for activities in or in support of any local government that does not affirmatively further fair housing within its own jurisdiction or that impedes the County's action to comply with its fair housing certifications.** In addition, the Cooperating Municipality agrees to indemnify and hold the County harmless against all losses, damages, penalties, settlements, costs, charges, fees, and other expenses or liabilities relating to or arising out of the failure of the Cooperating Municipality to comply with the Acts, the rules and regulations thereunder, and the undertakings and assurances in said application form.



HUD Notice CPD-10-02: Instructions for Urban County Qualification

- “This provision is required because noncompliance by a unit of general local government included in an urban county may constitute noncompliance by the grantee (i.e., the county) that can, in turn, provide cause for funding sanctions or other remedial actions by the Department.”

What does an AI involve?

- **Comprehensive review of:**
 - **Local laws, regulations and administrative procedures affecting:**
 - **Location, racial and ethnic composition**
 - **Availability and affordability**
 - **Accessibility of housing**
 - **Identification of private and public sector barriers to fair housing choice**



Impediment “Hot Spots”

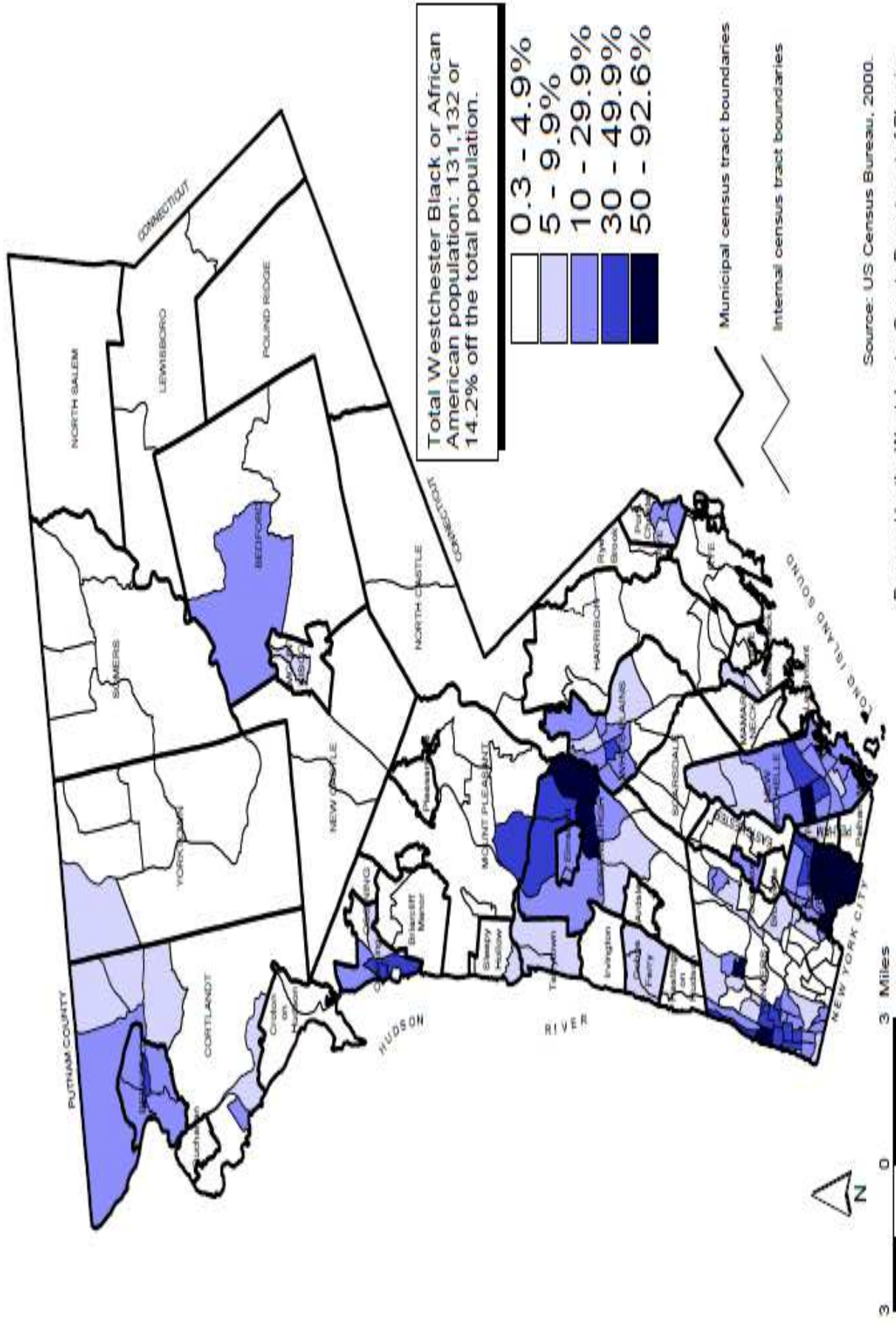
- Zoning/Land Use
- Low Income Housing Tax Credits
- Residency Preferences/Requirements
- Funding
- Section 8
- Source of Income



Westchester Litigation: A Cautionary Tale

- County received \$52 million+ in CDBG, HOME, ESG funds from 2000-2006
- Receipt of funds required repeated AFFH certifications
- Litigation brought under the False Claims Act: AFFH certifications were false because County did not consider race-based impediments to fair housing choice
 - Treble Damages
 - Share available to “relator”

WESTCHESTER COUNTY, NY





Westchester AI

- 2000 and 2004 Analyses of Impediments (“AIs”):
“The [Fair Housing Plan] describes the housing needs of handicapped persons, larger/smaller families [and] extended families....”
- AIs do not identify any impediments on the basis of race, color, national origin or any other protected class, even though County is part of one of the most segregated regions in the country
- No mention of housing discrimination or residential segregation



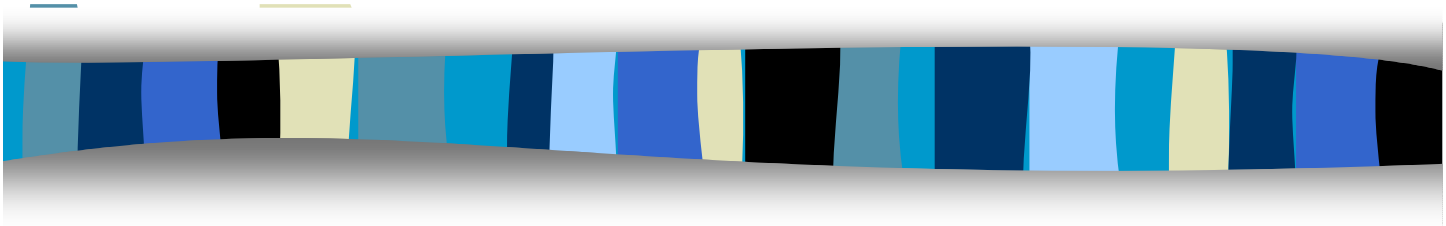
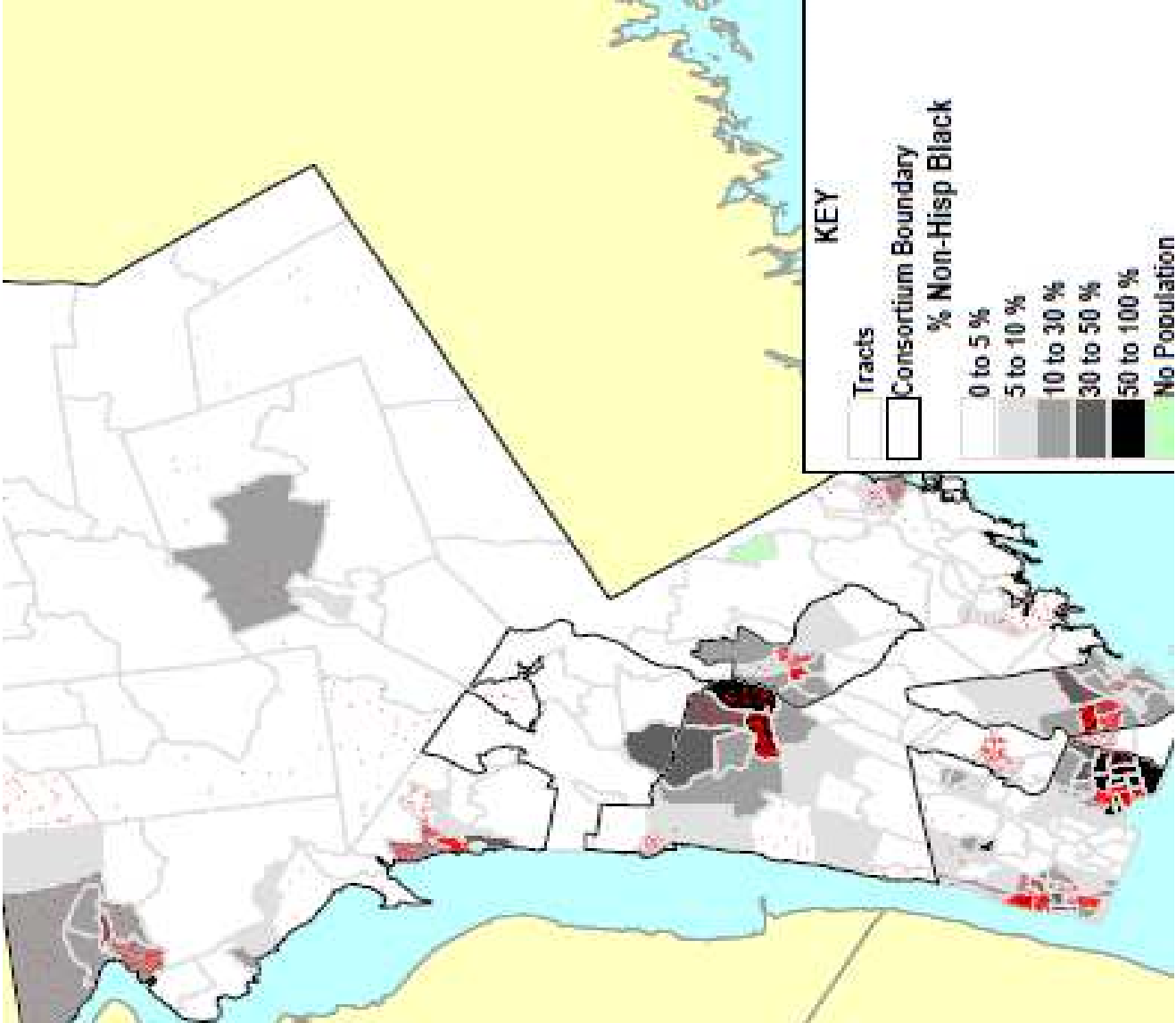
Allegations of the Complaint

- As a matter of policy, County **refused to monitor** the efforts of participating municipalities to further fair housing and did not inform them that Westchester might withhold federal funds if the municipality did not take steps to further fair housing.
- Throughout the false claims period, Westchester **never required a participating municipality to take any steps** to increase the availability of affordable housing or otherwise affirmatively further fair housing.



County's Defense

- Nowhere in the statute itself or in the implementing regulations is race mentioned specifically as an impediment to fair housing that grantees were required to consider
- Westchester states that “income is arguably a better proxy for determining need than race when distributing housing funds.”
- Race is “not among the most challenging impediments” to fair housing





Court Decision—2009

- “[T]he central goal of the obligation to AFFH [is] to end housing discrimination and segregation.”
U.S. ex rel. Anti-Discrimination Center v. Westchester County, 668 F.Supp.2d 548, 564 (S.D.N.Y. Feb. 24, 2009).
- “[A] determination that affordable housing is the greatest impediment does not absolve the County from its requirement to analyze race-based impediments to fair housing.” *Id.* at 562.



Court Decision—2009

- “As a matter of logic, providing more affordable housing for a low income racial minority will improve its housing stock but **may do little to change any pattern of discrimination or segregation.** Addressing that pattern would at a minimum necessitate an analysis of where the additional housing is placed. *Id.* at 564.



Settlement Terms

- County required to ensure development of 750 affordable housing units, within 7 years, in the whitest neighborhoods
 - 660 units must be built in municipalities with African-American population of less than 3% and Latino population of less than 7%
 - Additional integrative criteria at the census block group level



Settlement Terms

- County Returns \$30 Million to HUD
 - \$21.6 Million to Fund Integrative Units
 - \$7.5 Million to Pay “Relator’s Share” for Ferreting Out False Claims
- County Must Supply an Additional \$30 Million for Integrative Units
- County Pays \$2.5 Million in Attorneys’ Fees and Costs



Reviving AFFH Enforcement

- Deputy Secretary Ron Sims: “This is consistent with the president’s desire to see a fully integrated society.... Until now, we tended to lay dormant. This is historic, because we are going to hold people’s feet to the fire.”



The New York Times

HUD Steps Up in Texas

(Editorial, June 13, 2010)

Washington too often looks the other way as state governments rob low-income victims of their fair share of federal disaster aid. The Department of Housing and Urban Development did the right thing recently in forcing Texas to revise a \$3 billion spending plan for aid provided in the wake of the 2008 hurricanes Ike and Dolly....

Two prominent fair housing groups, Texas Appleseed and the Texas Low Income Housing Information Service, filed a complaint with HUD charging that the plan did not adhere to the most basic condition of federal disaster aid, which requires that half of the money be used to benefit low- and moderate-income people. They also argued that it would violate federal civil rights and fair housing laws....



Texas Conciliation Agreement

■ More resources to low-income communities

- An increase of \$152,899,572 million specifically designated to assist LMI
- Disaster survivors with low, very low, and extremely low incomes must be served in proportion to their share of overall housing damages in the area.
- Funding for one-for-one replacement of all public housing units in the City of Galveston and in other municipalities on an integrative basis
- Funding for rebuilding subsidized housing
- \$18 million “Impacted Area Buyout” program



Texas Conciliation Agreement

- Raises the bar on fair housing and civil rights compliance
 - Updated AI and clear standards for funding allocation and planning, consistent with AFFH
 - Methods of Distribution must describe how funding decisions AFFH
 - Mandates FHA/AFFH training for recipients
 - Reserves funding for “Moving to Opportunity” rental program



Marin County, California

- Voluntary Compliance Agreement (Section 109, Title VI and Rehabilitation Act):
November 2010
- Analysis of Impediments Draft: March 30, 2011
 - News coverage:
<http://www.thenewamerican.com/index.php/usnews/politics/6893-fed-govt-makes-race-an-issue-in-calif-community>

St. Bernard Parish (January 2011)

St. Bernard multifamily-housing battle opens new front

Published: Saturday, January 29, 2011, 10:00 AM Updated: Saturday, January 29, 2011, 7:44 PM



By Benjamin Alexander-Bloch, The Times-Picayune

For five years, **St. Bernard Parish** has been enbroiled in a debate over housing ordinances **that critics and a federal judge allege are racially discriminatory** and parish leaders say are designed to maintain the single-family residential character of the community.



[View full size](#)

Times-Picayune archive

Swaths of St. Bernard's storm-ravaged landscape were -- and still are -- ripe for planning, rebuilding, molding and reimagining the future of the parish. These rebuilt houses next to vacant lots were photographed in 2008.

And now, the allegations are coming from a second federal front.

As parish government prepares for a federal court hearing next week to defend itself against such accusations, the U.S. Department of Housing and Urban Development on Friday filed a complaint against it on an identical charge.

HUD officials say they've already conducted an extensive investigation into St. Bernard zoning and housing practices after receiving discrimination complaints, and that the filing of the complaint

officially commences a process that could quickly put the matter before the Justice Department.



Joliet, Illinois

- FHEO letter (May 25, 2011): “HUD cannot accept the draft AI.”
 - It “does not identify as impediments or analyze actions known to Joliet to restrict the availability of housing....”
 - It “does not specify an appropriate strategy or actions to overcome the effects of actions that aggravate the shortage of affordable housing for the protected class and other impediments to fair housing choice.”



Houston: We Have a Problem

- FHEO letter (November 30, 2011): “The city’s AI is incomplete and unacceptable...”
 - “The AI does not identify as impediments actions known to the city that perpetuate segregation....”
 - “[S]triking data [on racial segregation] is not identified, discussed or analyzed in the AI.”
 - “The AI lacks identification of actions to address the discrimination which it identified.”



HUD Administrative Complaints

- City of Atlanta (race and disability)
- State of Louisiana (race)
- Jefferson Parish, Louisiana (race)
- Danville, Illinois (race)
- Sussex County, Delaware (race and national origin)
- Waukesha County, Wisconsin (race)
- State of Maryland (LIHTC/race)



Danville, Illinois

- CPD letter (April 6, 2012): “Notice of Intent to Reject FY 2012 Action Plan Certification”
 - May 10, 2010: HUD finding of noncompliance based on Danville’s failure to prepare an AI
 - March 23, 2011: AI “substantially incomplete.”
 - April 6, 2012: “HUD continues to have serious concerns with the stated ... goals in the 2010 [Con Plan] to reduce the number of public housing units and Housing Choice Vouchers in the City.”



Sussex County, Delaware

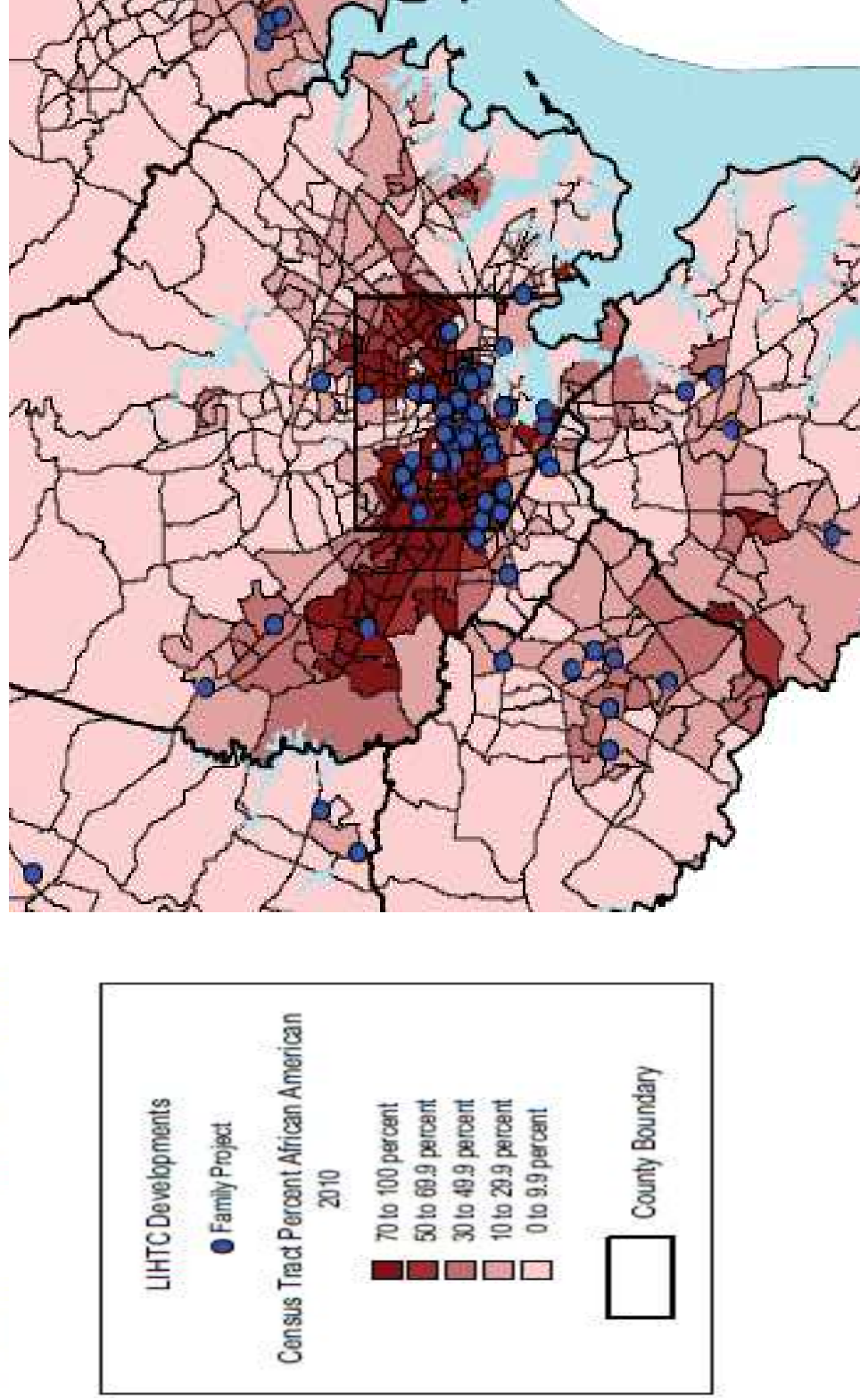
- Attempt to build a new subdivision of single family, for-sale homes in a community land trust for low-income service and agricultural workers blocked by County
 - HUD refers FHA claims to DOJ
 - HUD investigates Title VI, Section 109 claims
- Consent Decree in Federal Court and HUD VCA (November 2012)



State of Maryland

- Baltimore Regional Housing Campaign challenges State LIHTC “threshold criteria” requiring local approval/local contribution
 - Mapping demonstrates effect:
 - Lots of LIHTC family units in low-opportunity neighborhoods
 - Few LIHTC family units in high-opportunity neighborhoods

Map 1-2. LIHTC Family Projects by Census Tract Percent African American (2010)
Baltimore Region, Maryland





Audience Participation

- Anyone read the AI?
- Is your community complying with AFFH obligations?
- Are you aware of any impediments not included, or “appropriate actions” not taken to overcome identified impediment?
- Have you advised County or HUD?



HUD's Proposed AFFH Rule



Proposed Rule

(78 Fed. Reg. 43710-743)(July 19, 2013)

- Clarifies and expands the AFFH obligations of HUD “Program Participants”
 - States, Counties and Cities that are “entitlement jurisdictions” for CDBG, HOME, ESG, HOPWA
 - Public Housing Authorities (PHAs)
- HUD website on Proposed Rule:
http://www.huduser.org/portal/affht_pt.html



Assessment of Fair Housing

- Recognizing that “[s]egregation carries a heavy social cost,” 78 Fed. Reg. 43714, the Proposed Rule replaces the Analysis of Impediments (AI) with a new framework—the Assessment of Fair Housing, or AFH.



Definition of AFFH (§5.152)

- “Affirmatively furthering fair housing means taking proactive steps beyond simply combating discrimination to foster more inclusive communities and access to community assets for all persons protected by the Fair Housing Act.”



Definition of AFFH (§5.152)

- “More specifically, it means taking steps proactively to address significant disparities in access to community assets, to overcome segregated living patterns and support and promote integrated communities, to end racially and ethnically concentrated areas of poverty, and to foster and maintain compliance with civil rights and fair housing laws.”



Program Participants Must Take “Meaningful Action”

- The Proposed Rule defines the AFFH certification to mean that a block grant recipient “will take meaningful action to further the goals identified in the AFH ... and that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing.”
§§91.225, 91.325, 91.425.



AFH Must Address Zoning and Land Use Impediments to Fair Housing

- A Program Participant's strategies should “overcome segregated living patterns and support and promote integrated communities.” §5.152
- Participants must “examine relevant factors, such as zoning and other land-use practices that are likely contributors to fair housing concerns, and to take appropriate actions in response.” 78 Fed. Reg. 43716.



AFH Timing

- Participants are required to develop and submit an initial AFH to HUD 270 days before the start of the block grant or PHA funding cycle. §5.160(a). Participants will be required to submit an AFH every five years, §5.160(c), or when “a significant material change in circumstances occurs that calls into question the continued validity of the AFH....” §5.164.



AFH in Context

- In the AFH, Program Participants must identify, analyze and mitigate barriers to fair housing choice
- AFH tied into other planning processes through which federal, state and local resources are allocated, creating a fair housing lens for all of a participant's decisions about housing and community development needs



Unlike AI, AFH Submitted to HUD

- Participants must submit AFHs to HUD well in advance of annual Application for Federal Funds (in Consolidated Plan or Annual Action Plan)
- HUD can reject noncompliant AFHs, and impose a range of sanctions for noncompliance, up to and including withholding federal funds.



“Acceptance” of an AFH

- HUD has 60 days from the date of submission to review, and an AFH is deemed “accepted” if HUD does not give the participant written notice to the contrary within that period. §5.162(a).



“Acceptance” is not Approval

- HUD’s acceptance of an AFH “does not mean that HUD has determined that a jurisdiction has complied with its obligation to affirmatively further fair housing under the Fair Housing Act; has complied with other provisions of the Act; or has complied with other civil rights laws, regulations or guidance.” §5.162(a)(2)



HUD's AFH

“Acceptance” Criteria

- HUD “may choose not to accept an AFH, or a portion of the assessment, if it is inconsistent with fair housing or civil rights laws or if the assessment is substantially incomplete.”
§5.162(b).
- HUD can also turn down an AFH that is “developed without the required community participation or the required consultation.”
§5.162(b)(1).



Public Participation is Central

- The Proposed Rule enhances the public participation and consultation requirements, §5.158, and aligns the AFH regulations on this topic with those relevant to the expenditure of block grant funds under the Consolidated Plan process. §§91.100, 91.105, 91.110, 91.115 and the PHA Plan process. §903.15.



Program Participants Must Address “Fair Housing Issues”

- “local or regional segregation..., racial or ethnic concentrations of poverty, disparities in access to community assets, disproportionate housing needs based on race [and other protected classes] and evidence of illegal discrimination....”
§5.152.



AFH is Data Driven

- The new framework requires greater reliance on data, greater transparency and public participation in the development of the AFH, and greater accountability with respect to expanding housing choice.
 - HUD will provide uniform data sets to allow participants to identify fair housing issues.
§5.154(c)



Mandatory Areas of Inquiry

- Participants must use HUD data to identify the existence and extent of: (1) segregation, (2) racially or ethnically concentrated areas of poverty; (3) disparities in access to community assets, (4) disproportionate housing needs and (5) illegal discrimination. §5.154(d)(2)



Scope of AFH

- AFH must identify goals to AFFH and to inform fair housing strategies in other planning processes including, but not limited to housing, education, transportation, and environment. §5.154(d)
- AFH must consider all fair housing issues in a jurisdiction. §5.154(d)(1)



AFH Tied to Use of Funds

- The Proposed Rule requires the jurisdiction's Consolidated Plan and related submissions to HUD to describe how the priorities and specific objectives of the jurisdiction will affirmatively further fair housing, and that the description should be done by setting forth strategies and actions consistent with the goals and other elements identified in an AFH. §§91.215, 91.220, 91.315, 91.320, 91.415, 91.420.



Honest Conversations About Race and Segregation

- AFH process requires Program Participants to initiate and follow through on jurisdiction-specific community conversations about race, segregation and access to opportunity areas.



Objections/Complaints from the Public

- By enhancing the public participation requirements in the AFH, HUD invites members of the public to hold Program Participants accountable
- Flawed AFHs (or lack of public participation) can give rise to complaints and HUD compliance reviews



All Enforcement Options Remain

- The proposed Rule leaves in place HUD's enforcement powers with respect to the AFH and compliance with participants' AFFH obligations. *See, e.g.*, 24 C.F.R. §§91.500(b)(HUD approval action); 570.304 (making of grants); 570.485(c)(making of grants); 570.601 and 570.602 (civil rights certification requirements); 570.904 (equal opportunity and fair housing review criteria); 570.910—570.913 (corrective and remedial actions).



New AFFH Rule Governs All Funds, Not Just Federal Funds

- Proposed Rule emphasizes that a participant's AFFH obligation is not bounded by what it can do with the HUD funds it has received. The strategies and actions “will be accomplished primarily by making investments with federal *and other resources....*” §5.152; 78 Fed. Reg. 43716.



Lessons for Recipients of Housing and Community Development Funds

- “[T]he central goal of the obligation to AFFH [is] to end housing discrimination and segregation.”
- Taking AFFH seriously can alert a recipient to ways in which private sector activity is harming the recipient—e.g., *City of Baltimore v. Wells Fargo*



Lessons for Recipients of Housing and Community Development Funds

- AFFH certifications are material preconditions to the receipt of HUD funds
- Courts likely to see claims for payment as implicit AFFH certifications
- Recipients ignore HUD's *Fair Housing Planning Guide* and AFFH regulations at their peril



Lessons for Recipients of Housing and Community Development Funds

- A recipient must identify *all* impediments experienced by *all* protected classes, and must keep records of this analysis
 - Whether created by public or private sector, impediments must be analyzed
 - Impediments may include actions or policies that discriminate on the basis of protected class, whether by way of intentional discrimination or disparate treatment
 - A recipient is not excused from such an analysis by identifying the “greatest” or “most challenging” impediment; it must analyze everything it finds



Lessons for Recipients of Housing and Community Development Funds

- Permitting concentration of affordable housing development in minority neighborhoods likely perpetuates segregation and is a violation of the recipient's AFFH obligation
- A recipient must take appropriate actions to overcome the impediments identified, and keep records of those actions
- It is impossible to meet this requirement in the absence of an adequate identification and analysis of underlying impediments



Lessons for Recipients of Housing and Community Development Funds

- Recipients are responsible for the AFFH compliance of their sub-recipients
 - You can't fund jurisdictions whose policies and practices are AFFH non-compliant
- There will be more vigorous AFFH enforcement in the coming years:
 - Administrative complaints to HUD
 - HUD “front end” and compliance reviews
 - Litigation by civil rights groups
 - Litigation by developers and property owners



What is a Recipient to Do?

- Be proactive about AFFH and partner with knowledgeable public and private fair housing agencies
- Recipients who have not done or updated an AI since 2006 should conduct a new one ASAP, and engage with *all* interested parties
- Make sure the AI is an honest review of local government policies that may diminish fair housing choice in the jurisdiction



What is a Recipient to Do?

- Be vigilant about changes in housing and credit markets
- Since regional housing markets do not stop at your jurisdiction's border, investigate other communities' AFFH practices and coordinate with them appropriately
- TARP and economic stimulus money—to the extent it is in “programs and activities relating to housing and urban development”—brings AFFH obligations



Resources

- Michael Allen's Emory U. Presentation on AFFH:
<http://www.youtube.com/watch?v=yzYSH1KcuAQ>
- Gurian and Allen, *Making Real the Desegregating Promise of the Fair Housing Act: "Affirmatively Furthering Fair Housing" Comes of Age*, in Clearinghouse Review:
http://www.relmanlaw.com/docs/Clearinghouse_Article_on_Westchester.pdf



Resources

- Allen, *No Certification, No Money: The Revival of Civil Rights Obligations in HUD Funding Programs*, in *Planning Commissioners Journal*:
<http://www.relmanlaw.com/docs/WestchesterArticle.pdf>
- HUD *Fair Housing Planning Guide*:
<http://fhasecure.gov/offices/ftheo/images/fhpg.pdf>
- Information about Westchester litigation:
www.antibiaslaw.com/wfc



Resources

- Exemplary Analyses of Impediments:

- City of Naperville (Ill.):

- http://www.planningcommunications.com/ai/naperville_ai_2007.pdf

- City of Murfreesboro (Tenn.):

- http://www.planningcommunications.com/ai/murfreesboro_tn_ai_2010.pdf

- Lakewood (Ohio):

- <http://www.planningcommunications.com/ai/Lakewood%20OH%20AI%202011.pdf>