

# 7.0 Achievements of the 1996 AI

To develop an effective fair housing strategy for the 2003-2008 planning period, the CDC must assess the progress made since the preparation of the 1996 Analysis of Impediments (AI) to Fair Housing Choice and the 1998-2003 Fair Housing Strategic Plan for the Urban County. This assessment allows the CDC to determine the effectiveness and continued appropriateness of the existing fair housing strategies and programs, and make necessary adjustments for the next five years.

## Review of the 1996 AI

The 1996 Analysis of Impediments (AI) to Fair Housing Choice provides an assessment of the progress made and challenges in fair housing in Los Angeles County between 1970 and 1995. The central message of this report is that the fair housing environment in Los Angeles County – the nature and extent of housing segregation and discrimination – has changed dramatically over the previous generation, and for the most part, positively. Although problems remain, they are generally quite different from those that prompted the initial drive for fair housing laws.

### Summary of 1996 Impediments

The 1996 AI identifies 18 impediments to fair housing choice in Los Angeles County. These are summarized below.

1. No comprehensive fair housing plan exists in Los Angeles County to combat discrimination.
2. Enforcement of fair housing laws is inadequate.

3. Overt and subtle racial discrimination against Latinos continues, especially towards immigrants.
4. Fair housing discrimination against Blacks has declined, but is still common in the following three areas: (1) the terms and conditions of housing; (2) neighborhoods of racial transition; and (3) the few remaining neighborhoods with no significant Black presence.
5. Families with children, especially larger families or those headed by single mothers, are routinely excluded from rental housing or charged higher rents.
6. Blacks and Latinos have poorer quality access to financial services than other groups.
7. Monitoring of fair housing activities is inadequate. Some services are deficient or are not being provided, and this is due, in part, to lack of competition for services.
8. Current mechanisms for identifying discrimination are predominantly reactive rather than proactive, and testing methods frequently fail to identify discrimination.
9. Little regional coordination even though many problems are best attacked on a regional scale.
10. Current enforcement activities are diluted by a substantial allocation of resources to landlord-tenant counseling.
11. Public outreach is inadequate. Little public awareness of (a) fair housing services; (b) the illegality of discrimination against families with children; (c) the extent of racial integration in Los Angeles; or (d) the substantial level of racial tolerance and desire for integration. Housing providers and non-profit housing advocates are poorly linked to the existing fair housing movement.
12. There exists inadequate coordination between various entities on fair housing.
13. The generally high level of diversity in Los Angeles neighborhoods is endangered by the neglect of relatively simple, small-scale initiatives that could slow neighborhood resegregation and encourage neighborhood diversity.
14. Levels of Black forced-segregation in Los Angeles are higher than those generally experienced by other groups, and the resulting negative social and economic consequences are severe.

15. The Housing Authority of the City of Los Angeles (HACLA) and, to a lesser extent, the Housing Authority of the County of Los Angeles (HACoLA) have not adequately integrated fair housing policies and laws into their site selection process.
  
16. Many of the largest public housing sites in the City and County of Los Angeles are racially segregated. The outreach and tenant assignment policies of the public housing authorities might be contributing to these patterns of segregation.
  
17. Public housing rental subsidy programs tend to intensify segregation and constrict residential choice.
  
18. Fair housing issues are inadequately integrated into the analysis and implementation of other housing and community development activities.

## Goals and Strategies

The 1996 AI proposes the following goals, along with short- and long-term strategies, to mitigate the 18 identified impediments.

### Goal 1: Create a planning task force and develop a comprehensive fair housing plan.

Short-Term Strategies	Long-Term Strategies
<ul style="list-style-type: none"> <li>• Form and convene the task force on a regular basis.</li> <li>• Develop the conceptual components of the plan.</li> <li>• Commit City and County staff.</li> <li>• Initiate full application testing.</li> <li>• Develop a preliminary plan by April 1998, which sets numerical and substantive targets on key problems.</li> </ul>	<ul style="list-style-type: none"> <li>• Develop a consortium of local governments to adopt common strategies, funding priorities, and information collection systems on fair housing.</li> <li>• Institute requirements on all fair housing grantees to describe how their programs substantively impact goals in the fair housing plan.</li> <li>• Explore creating a program which fosters racial integration, and identify short and long-term financial and social benefits resulting from such a policy.</li> </ul>

**Goal 2: Enforce fair housing laws more quickly and increase litigation to correct the current inadequacies in enforcement.**

Short-Term Strategies	Long-Term Strategies
<ul style="list-style-type: none"> <li>• Create a fair housing attorney network.</li> <li>• Develop and monitor an index of cases that could be litigated.</li> <li>• Introduce full application testing.</li> <li>• Increase collaboration amongst agencies to develop legal cases.</li> <li>• Lift the ban on testing within incorporated areas under County jurisdiction.</li> </ul>	<ul style="list-style-type: none"> <li>• Allocate more resources to vigorous enforcement efforts.</li> <li>• Create a funding pool (e.g., \$50,000 per year) to support a fair housing law clinic.</li> <li>• Match litigation information against discrimination trends (drawn from full application testing) to evaluate and "model" how different litigation activities affect the volume of discrimination.</li> </ul>

**Goal 3: Increase outreach and enforcement in the Latino community commensurate with the scale of challenges this community faces.**

Short-Term Strategies	Long-Term Strategies
<ul style="list-style-type: none"> <li>• Fund full application testing.</li> <li>• Increase community awareness and emphasizing findings on Latino discrimination.</li> <li>• Litigate a limited number of Latino discrimination cases.</li> <li>• Engage Spanish speaking personnel to handle calls from Spanish speaking complainants at fair housing agencies.</li> </ul>	<ul style="list-style-type: none"> <li>• Initiate television announcements about fair housing on Spanish language stations and creating other new outreach formats.</li> <li>• Improve access to fair housing services for Latinos.</li> </ul>

**Goal 4: Focus fair housing enforcement efforts on the types of discrimination African Americans are most likely to encounter.**

Short-Term Strategies	Long-Term Strategies
<ul style="list-style-type: none"> <li>• Fund full application testing to develop better information about African American discrimination.</li> <li>• Incorporate a limited audit program into the normal course of enforcement efforts based on a review of these sites.</li> </ul>	<ul style="list-style-type: none"> <li>• Develop an anti-discrimination campaign and focus fair housing enforcement activities on both the purchase and rental markets.</li> <li>• Purchase markets are important because, unlike normal housing programs that confer specific, substantial benefits upon specific households, fair housing programs benefit the entire community, and the person "served" is largely a vehicle for the enforcement of laws on behalf of the community.</li> </ul>

Goal 5: Reduce discrimination against families with children.

Short-Term Strategies	Long-Term Strategies
<ul style="list-style-type: none"> <li>● Create a task force on large family discrimination and funding full application testing.</li> </ul>	<ul style="list-style-type: none"> <li>● Conduct in-house tenant surveys in areas that, statistically, appear to have the largest disparities in rents between families with children and other households.</li> <li>● Increase awareness of fair housing laws prohibiting discrimination against families with children, aiming media at renters and landlords.</li> <li>● Train landlords.</li> <li>● Publicize lawsuits.</li> <li>● Since the economic benefits of discrimination for landlords are clear, it is vital to pair educational efforts with a well publicized enforcement campaign. Public education efforts should include discussion about the norms of density in housing to help different groups understand what norms public agencies are trying to pursue and what rights families have.</li> <li>● Launch targeted enforcement efforts.</li> <li>● Litigate a limited number of discrimination cases beginning in fiscal year 1997/98.</li> <li>● Standardize occupancy codes in the County which are sensitive to cultural norms on occupant density.</li> </ul>

**Goal 6: Strengthen links between minority home buyers and banks.**

Short-Term Strategies	Long-Term Strategies
<ul style="list-style-type: none"> <li>● Pursue opportunities to create a community development bank under the Community Development Financial Institutions Act of 1994 which provides funding for quasi private community banks modeled on the South Shore Bank of Chicago, as well as determining the "lending gap" between different demographic groups of homeowners securing conventional financing and developing initiatives to close this "gap."</li> <li>● Analyze the loan results from application testing.</li> <li>● Incorporate financial institution testing into the planning process, including completion by the Fair Housing Congress in Fall 1996 of a two-year grant project funded by HUD to test financial institutions. Preliminary results indicate that there is a lack of financial resources to help minorities and first time home buyers to obtain funding for the purchase of a new home.</li> </ul>	<ul style="list-style-type: none"> <li>● Focus outreach on banks with documented inadequacies in minority lending.</li> <li>● Pursue remedies through the CRA when faced with uncooperative banks.</li> <li>● Create a clearinghouse for lending discrimination complaints.</li> <li>● Develop and foster an aggressive, creative outreach program on lending through various media to minority communities.</li> </ul>

**Goal 7: Develop effective mechanisms for monitoring.**

Short-Term Strategies	Long-Term Strategies
<ul style="list-style-type: none"> <li>● Redesign monitoring mechanisms.</li> <li>● Evaluate fair housing service follow up through fill application testing.</li> <li>● Incorporate substantive achievements into the evaluation process. With the development of better data, it will be feasible to incorporate measurements of performance in litigating cases, general levels of public awareness about fair housing services, and the like.</li> </ul>	<ul style="list-style-type: none"> <li>● Promote competition for grant funds.</li> <li>● Encourage the City and County to divide, bundle and target smaller sets of fair housing services.</li> <li>● Distribute requests for proposals to various potential service providers to increase the incentive for the provision of more and better services.</li> </ul>

**Goal 8: Supplement the current complaint response method with proactive strategies aimed at particular problems.**

Short-Term Strategies	Long-Term Strategies
<ul style="list-style-type: none"> <li>● Focus on specific social outcomes.</li> <li>● Implement full application testing. Since discrimination is common enough to capture through random but careful auditing, it makes much more sense to adopt audit testing, a proactive method, as the principal fair housing enforcement tool. Full application testing also provides a reliable way of measuring the real extent of different types of discrimination, because they are almost never “inconclusive.” They show that discrimination either does or does not exist.</li> </ul>	<ul style="list-style-type: none"> <li>● Ensure regular testing of major landlords and rental management companies.</li> <li>● Target geographic areas through demographic analysis that have particular types of discrimination.</li> <li>● Combat family discrimination through demographic analysis in areas where particular problems are likely to occur.</li> <li>● Conduct targeted tenant outreach to determine if differential rents exist.</li> </ul>

**Goal 9: Encourage the City/County to cooperate in funding joint fair housing strategies with other jurisdictions in Los Angeles County and other counties in Southern California.**

Short-Term Strategies	Long-Term Strategies
<ul style="list-style-type: none"> <li>● Develop unified regional strategies for fair housing throughout Greater Los Angeles by involving representatives from jurisdictions across the County in the planning process through various mechanisms such as computer networks, monthly newsletters, and meetings, to overcome the high number and geographic dispersion of these cities.</li> </ul>	<ul style="list-style-type: none"> <li>● Build consensus, involvement, and funding for regional strategies.</li> </ul>

**Goal 10: Give highest priority to fair housing activities. Consider referring landlord tenant problems to other agencies.**

Short-Term Strategies	Long-Term Strategies
<ul style="list-style-type: none"> <li>● Identify agencies through which tenants can secure legal landlord tenant problem assistance.</li> <li>● Develop a quick, easy referral system and explore the potential for creating a linked service network.</li> </ul>	<ul style="list-style-type: none"> <li>● Improve the system for servicing tenant needs.</li> <li>● Develop a standardized guide to landlord tenant law and available services. Produce and disseminate a Spanish language version.</li> <li>● Limit landlord tenant counseling to those cases which include a fair housing component.</li> </ul>

### Goal 11: Increase housing awareness.

Short-Term Strategies	Long-Term Strategies
<ul style="list-style-type: none"> <li>● Develop a three-year education and outreach program incorporating fair housing strategies.</li> <li>● Identify specific outreach activities that fair housing entities can use to raise awareness.</li> <li>● Create a public relations campaign using pamphlets, local news, public affairs, and talk show coverage to promote and disseminate fair housing material such as the significant findings in this analysis.</li> <li>● Dedicate a highly skilled, full time employee to develop specialized media. Such outreach would reshape cultural norms about racial understanding.</li> </ul>	<ul style="list-style-type: none"> <li>● Award separate grants for outreach activities.</li> <li>● Enlist the entertainment industry to develop television, radio, and newspaper spots.</li> <li>● Use high profile personalities.</li> <li>● Deploy these spots across a variety of broadcast and print media in the County on a regular basis to increase message coverage and raise awareness.</li> <li>● Target Latinos, Koreans, Chinese, Cambodians, and Armenians.</li> <li>● Provide bilingual materials.</li> <li>● Recruit testers from these communities to enforce fair housing.</li> <li>● Establish linkages, referral networks, satellite offices and education efforts in these communities to inform housing consumers about their rights.</li> <li>● Produce a seminar series for each of the major housing market constituencies: realtors; bankers; and landlords as well as non profit and public housing providers as a preventative, proactive measure.</li> <li>● Encourage service providers to improve direct contact with clients and populations served.</li> <li>● Train individuals about their rights and responsibilities before they experience discrimination by incorporating fair housing training into high school curricula and social service programs so that individuals entering the housing market are aware of the laws regulating their transactions.</li> </ul>

**Goal 12: Create a coordination mechanism which brings together all the parties that are necessary to improve housing choices.**

Short-Term Strategies	Long-Term Strategies
<ul style="list-style-type: none"> <li>Bring together all those entities which can effect fair housing and begin to coordinate on overlapping issues.</li> </ul>	<ul style="list-style-type: none"> <li>Develop a permanent forum or mechanism for ongoing collaboration between all parties who can effect positive change in fair housing.</li> </ul>

**Goal 13: Promote diversity and defuse neighborhood resegregation.**

Short-Term Strategies	Long-Term Strategies
<ul style="list-style-type: none"> <li>Identify neighborhoods that are threatened by resegregation, studying the "Valley Experience" program.</li> <li>Identify strategies used by other jurisdictions to promote diversity.</li> </ul>	<ul style="list-style-type: none"> <li>Fund neighborhood diversity initiatives.</li> <li>Train real estate agents.</li> <li>Test for steering.</li> <li>Model seminars after "Home seeker seminars" pioneered by Chicago's fair housing agency (the Leadership Council for Metropolitan Open Communities) for Latino and African American home seekers on residential choices and opportunities available in areas of low minority concentration.</li> <li>Increase public awareness of opportunities for diversity in regions threatened by resegregation.</li> <li>Establish linkages, referral networks, satellite offices, and education to inform housing consumers about their rights.</li> </ul>

**Goal 14: Reduce forced African American segregation.**

Short-Term and Long-Term Strategies
<ul style="list-style-type: none"> <li>Conduct a systematic analysis of the costs and benefits of a large scale program which would reduce forced African American segregation.</li> <li>Implement a program which would experiment with various subsidies and education programs to enhance mobility.</li> </ul>

**Goal 15: Increase the level of fair housing expertise and consideration when HACLA and HACoLA choose housing sites.**

Short-Term Strategies	Long-Term Strategies
<ul style="list-style-type: none"> <li>● Increase fair housing expertise at HACLA and HACoLA.</li> <li>● Develop site selection procedures at HACLA and HACoLA that better incorporate fair housing laws and concerns.</li> </ul>	<ul style="list-style-type: none"> <li>● Reduce the concentration of public housing tenants in poor, predominantly minority, neighborhoods and shift to vouchers and other mobile certificates.</li> </ul>

**Goal 16: Ensure that all eligible residents have a comparable chance of learning about and applying for public and publicly subsidized housing.**

Short-Term Strategies	Long-Term Strategies
<ul style="list-style-type: none"> <li>● Encourage public housing agencies to participate in the analysis of outreach strategies for housing programs to assess the effects of current outreach mechanisms in skewing the makeup of tenants in these programs.</li> <li>● Instruct public housing agencies not to divulge a project's racial makeup during their assignment process for newly selected public housing tenants. This latter strategy recommends offering newly selected public housing tenants only one project assignment at a time and offering second sites only for narrowly limited "good cause" reasons.</li> </ul>	<ul style="list-style-type: none"> <li>● Increase project integration and decrease forced segregation.</li> </ul>

**Goal 17: Affirmatively seek to increase the proportion of Section 8 landlords located in economically and racially diverse neighborhoods, and give participating tenants every opportunity, through counseling and other means, to choose such housing.**

Short-Term Strategies	Long-Term Strategies
<ul style="list-style-type: none"> <li>● HACLA should participate in the "Moving to Opportunity" program.</li> <li>● Encourage the exchange of information between HACLA and HACoLA on methods to recruit new landlords to Section 8.</li> <li>● Place Section 8 tenants in diverse and economically integrated neighborhoods.</li> </ul>	<ul style="list-style-type: none"> <li>● Develop ongoing programs to identify Section 8 landlords in economically and racially integrated communities.</li> <li>● Streamline the Section 8 program to encourage non-specialist landlords to participate.</li> <li>● Consider setting limits on the proportion of a building's Section 8 tenants.</li> <li>● Provide tenant counseling aimed at maximizing meaningful choice.</li> </ul>

**Goal 18: Integrate fair housing into housing and community development activities.**

**Short-Term and Long-Term Strategies**

- Study ways to better weave fair housing concerns into other housing and community development activities.

## Limitations of the 1996 AI

The 1996 AI addresses in depth the history and patterns of racial segregation and discrimination in Los Angeles County. However, the AI provides only general discussions on public policies as impediments to fair housing. In particular, the 1996 AI contains limited information on the following issues:

- The effect of local zoning and policies that place restrictions on the number of unrelated persons occupying dwellings, that impose minimum lot size requirements, or that impose dispersal requirements for group homes.
- Lending discrimination against women.
- Racial segregation and segregation of families with children.
- Prevalence of conventional financing.
- Incidence of hate crime.

Given these issues are critical to the study of fair housing, they are addressed in detail in the updated 2003 AI.

# Achievements of the Current Fair Housing Strategic Plan

One of the impediments identified in the 1996 AI is that Los Angeles County lacks a comprehensive fair housing plan to combat discrimination. To address this issue, the County developed a Five-year Strategic Plan for Fair Housing in the Los Angeles Urban County for FY 1998-2003. The following three goals were established in the Strategic Plan:

1. An Educated Community
2. Compliance with Fair Housing Laws
3. Fair Housing Partnership

Each goal has associated strategies and timeframes that were stated in the Five-Year Strategic Plan, which are also updated each year in the County's annual Action Plan with specific measurement benchmarks, monitored each year in the annual Consolidated Annual Performance and Evaluation Reports (CAPERs), and referenced in every related document pertaining to fair housing that the County releases.

To more efficiently implement these goals and strategies, the CDC contracts for fair housing services using CDBG funds. The contract between the CDC and the fair housing service provider specifically states that services provided will be linked to the Five-year Strategic Plan, and includes the goals and strategies to be met as part of the contract. Moreover, requests for proposals for fair housing services are tailored to the specific goals and strategies identified in the Strategic Plan, allowing the CDC to effectively monitor progress.

Based on the contract, fair housing services are provided among participating cities and the unincorporated areas. However, investigations of fair housing complaints are only conducted in the unincorporated areas due to funding limitations.

In addition to the services provided under the CDC's contract, participating cities may also contract for services using city CDBG allocations. Currently, five cities contract separately from the County for fair housing services. These include: Artesia, Cudahy, Hawaiian Gardens, Maywood, and Signal Hill.

Through the Strategic Plan, the County has sought to assist 30,000 people over the five year period of 1998-2003, or 6,000 people annually. Appendix D contains a description of various housing programs that the County offers to mitigate fair housing concerns by providing affordable and decent housing opportunities for all, with special focus on households with special needs. The following section analyzes the CDC's progress and success in implementing its Five-Year Strategic Plan for fair housing through the accomplishments of the fair housing service providers.

## Goal 1: An Educated Community

Realizing the importance of increasing awareness of fair housing laws, the CDC adopted a proactive approach to disseminating fair housing information to reduce housing discrimination. The CDC began this new approach to education and outreach in 1998 and has continued the efforts throughout the entire five-year period.

**Strategy 1:** Increase public awareness of fair housing laws, with an emphasis on members of the protected groups.

**Accomplishments:** The Housing Rights Center (HRC) conducts all County-wide events and local events within their service area, while the Fair Housing Foundation (FHF) and Fair Housing Council of San Fernando Valley (FHC/SFV) conduct local outreach in their respective service areas. Languages spoken by staff include English, Spanish, Mandarin, Cantonese, Armenian, Portuguese, Russian, and Vietnamese. Outreach and education efforts take place via the following six methods:

- **Literature:** Literature was distributed during neighborhood visits, through mailings, and per request. Together, the agencies have established a goal of disseminating 4,000 pieces of literature each year, which has been exceeded each year.
- **Presentations:** The HRC conducts two workshops per quarter. The FHF and FHC/SFV conduct one workshop in each of their service areas quarterly.
- **Booths:** The HRC staffs two booths per quarter. The FHF and FHC/SFV staff a booth in each of their service areas quarterly.

- **Media Efforts:** HRC conducts two public service announcements per quarter. In addition, a variety of newspapers are contacted for large events, case settlements, fair housing reports, etc. Target print media outlets include: The Los Angeles Times, the Los Angeles Weekly, La Opinion, Los Angeles Sentinel, the Armenian Observer, and the Chinese American Daily News. Target radio and television media outlets include: KTNB-AM 1020, KREA-FM 93.5, KXED-AM 1540, Telemundo, KCET-TV Channel 28, and KVEA-TV Channel 52.
- **Special Events:** The following three special events are also included in the outreach and education efforts of the HRC: *A Fair Housing Summit* in April, a *Basic Tools in the Litigation of Fair Housing Cases* training in November, and a *Predatory Lending in California* seminar in June. Each of these events is held annually.
- **Outreach to Immigrant and Non-English Speaking Communities:** The HRC has identified East Los Angeles, San Gabriel, West Hollywood, and Cerritos as target areas. The agency also focuses on the media outlets pertinent to each cultural area (i.e. La Opinion Newspaper) as well as staff events and places where immigrants, people of color, and low-income residents frequent (i.e. Cinco De Mayo Festival, and the Black Business Expo). A database of existing organizations within these populations is currently being created to increase outreach capabilities and efforts to increase volunteerism in these areas is also underway.

**Strategy 2: Conduct training sessions for consumers, with an emphasis on members of the protected groups.**

**Accomplishments:** Two main types of workshops are offered to educate consumers/residents within the Urban County: one for fair housing issues and the other for landlord/tenant issues. As previously stated, the HRC provides two workshops per quarter, while the FHF and FHC/SFV provide one each per quarter. Translation is available upon request. Over the past five years there have been many workshops, presentations, etc. provided to County residents, though the number of attendees has not been consistently recorded/reported in the quarterly reports submitted to the County, nor are these types of statistics evident in the annual CAPER reports.

**Strategy 3: Conduct training sessions for landlords, managers, realtors, and other housing providers.**

**Accomplishments:** Three main types of workshops are offered to educate housing providers: Landlord Workshops, Certificate Management Trainings, and Realtor Trainings. The HRC provides two workshops per quarter, while the FHF and FHC/SFV provide one each per quarter. Trainings are conducted in other languages as needed and the Certificate Management Training Manual has recently been translated into Spanish and Korean. Over the past five years, there have been many workshops and trainings provided to housing providers, but again, the number of attendees has not been consistently recorded/reported in the quarterly reports submitted to the County, nor in the annual CAPER report.

**Strategy 4: Respond to discrimination inquiries and complaints.**

**Accomplishments:** The CDC aims at keeping an open line of communication between County residents and fair housing service providers that are knowledgeable and capable of answering questions and offering advice. Responses to discrimination inquiries and complaints are handled by filling out an intake form to determine the next appropriate step. Counseling and/or referrals are given in all instances. If a possible violation is indicated during the intake phase, a case number is assigned and further investigation is required. Investigation techniques include testing, surveys, on-site visits, witness statements, document review, and legal research. After an investigation is complete, a determination/finding is made, and the case is either closed or processed to the resolution stage, which includes either conciliation, or referral to a government administrative agency, or referral to a litigation department or private attorney.

As illustrated in Table 7-1, the number of complaints responded to between FY 1998/99 through FY 2001/02 has fluctuated annually. The majority of complaints have come from Whites, Hispanics, and lower income persons.

**Table 7-1  
Discrimination Complaints**

Type	1998/99	1999/00	2000/01	2001/02
Female Householder	1,043	3,318	*	1,490
<b>Race</b>				
White	735	1,918	955	1,310
African-American	328	980	518	678
Native	12	58	27	37
Hispanic/Latino	937	2,444	1,426	1,983
Asian/Pacific Islander	90	183	133	191
Other	92	365	256	268
<b>Income</b>				
Extremely Low	437	1,751	*	1,261
Low	1,080	2,255	*	1,856
Moderate	478	1,267	*	893
Above Moderate	199	675	*	457
<b>Total</b>	<b>2,194</b>	<b>5,948</b>	<b>3,315</b>	<b>4,467</b>

\*not reported

Source: CAPER reports from LACDC, 1998-2001.

**Strategy 5: Keep participating cities informed and involved.**

**Accomplishments:** The CDC is responsible for ensuring that the 48 participating cities know that fair housing inquiries and complaints are to be directed to the fair housing contractor. The CDC coordinates with its fair housing service providers to notify the participating cities about upcoming events and training sessions. The CDC also conducts quarterly meetings and visits with the participating cities to maintain relations among staff. Reports submitted to the CDC state that the Fair Housing Congress invited all of the participating cities to all of the events held in a consistent manner, though specific detail of the city outreach strategy/format was not discussed.

**Strategy 6: Conduct surveys and studies to enhance fair housing planning.**

**Accomplishments:** In cooperation with UCLA, the CDC conducted research on public transit accessibility in the FY 1998-99. Most of the studies suggested in the strategic plan have either been conducted by entities other than the County or the topics have been covered in a different capacity. By relying on the efforts of others, due to funding limitations and a lack of staff with time to devote to these detailed studies, the CDC may have missed opportunities to better plan for and implement their own strategies to further fair housing.

## Goal 2: Compliance with Fair Housing Laws

To further fair housing, the CDC combined education with a means of deterring discrimination through testing and litigation. By successfully reporting and resolving fair housing complaints and lawsuits, then publicizing the results as part of the education campaign, the CDC's fair housing program acts as a deterrent to discrimination to some extent. One of the discrepancies the CDC has encountered with this goal is in tracking and monitoring the publication of the results of fair housing complaints and lawsuits handled by each of the fair housing councils.

### Strategy 1: Record discrimination complaints.

**Accomplishments:** Documentation of discrimination complaints is in database form and general case files. Intake forms collect data on race, ethnicity, sex, income, type of complaint, etc. Various reports can be generated depending on the type of statistics desired. Counseling and complaint management are tracked for fair housing issues, as well as landlord/tenant issues. In addition, outreach and education efforts are tracked along with staff activities.

However, due to the various fair housing councils involved, outreach and statistical information are tracked differently by each agency. Thus, inconsistent reporting makes the assessment of fair housing complaints difficult and potentially inaccurate.

### Strategy 2: Investigate discrimination complaints, using standard and full-application testing.

**Accomplishments:** Discrimination complaints are investigated according to the following steps:

1. Calls are screened using an intake form
2. Counseling and/or referrals
3. If a possible violation is indicated during the intake phase, a case number is assigned and further investigation is required
4. Investigation techniques include, testing, surveys, on-site visits, witness statements, document review, and legal research
5. After an investigation is complete, a determination/finding is made
6. Case is either closed or processed to the resolution stage, which includes either conciliation, or referral to a government administrative agency, or referral to a litigation department or private attorney

When testing is necessary, the following methods may be used in combination with standardized reporting forms:

- Telephone tests
- On-site tests
- Application tests

When full testing is not possible or appropriate, the fair housing service provider uses surveys, on-site visits, witness statements, document requests and review, and legal research.

The testing/investigating techniques and results reported by the HRC during the past three years of the Strategic Plan period are summarized in Table 7-2. As indicated, surveys and vacancy tests have been the most heavily relied upon forms of testing for complaints. However, the overall level of testing performed is minimal, compared to the size and complexity of the Urban County. Also, testing is only performed in unincorporated areas while many fair housing complaints originate from inner city communities.

**Table 7-2**  
**Summary of Investigation Activities**  
**July 1, 1999 – June 30, 2002**

Type of Activity	1999/00	2000/01	2001/ 02	Total
Vacancy Checks	2	15	21	38
Telephone Tests	1	1	1	3
On-site Tests	1	8	6	15
Surveys	18	5	45	68
Witness Statements	1	0	4	5
Total	23	29	77	129

Source: Housing Rights Center, 2002.

The CDC stated in the Strategic Plan that the contractor would be required to conduct initial investigations of discrimination complaints within three days of receipt, whenever possible, and notify the complainant about the results of the testing within two days of completing the investigation; however a strategy for monitoring this requirement was never instituted or enforced. Current reporting formats submitted to the CDC do not illustrate these types of details.

**Strategy 3: Resolve discrimination complaints.**

**Accomplishments:** Approximately 75 percent of the complaints received by the FHF were resolved or counseled over the past five years, while the remaining 25 percent became cases or were referred to higher authorities. HRC resolved/counseled 63 percent of complaint inquires, while 35 percent became cases.

Of the cases reported by HRC, 36 percent were successfully conciliated, but nearly the same proportion (35 percent) were said to have no enforcement action available. The remaining cases were either referred to higher authorities or the clients withdrew. An explanation of why “no enforcement action” was available to 35 percent of HRC’s cases was not provided, nor did the CDC ever require the information to be provided. Yet, the CDC’s Strategic Plan indicated the Commission’s desire to compile this information in order to assess and further Fair Housing.

The statistical information provided above is available through the various fair housing councils, but it was neither reported in the CAPER reports, nor in the quarterly reports submitted to the CDC.

**Strategy 4: Conduct discrimination audits -- geographic and ownership.**

**Accomplishments:** The FHF conducted 133 audits during the five-year implementation period, though none of them were mentioned in the County’s annual CAPER reports. HRC conducted 129 investigations, which were also never reported on in detail. Thus, it is difficult to analyze the extent this strategy has helped the CDC accomplish its goals. Statistics provided by the fair housing service providers indicate that the vast majority of calls come from the rental market, making it obvious that the potential for discrimination exists there. Yet, the Strategic Plan specifically identified conducting ownership audits and geographically targeted areas to expose patterns of practices. There is no indication that this was ever done.

**Strategy 5: Monitor fair housing services contractor effectively.**

**Accomplishments:** It is not apparent that a comprehensive monitoring of the fair housing service provider took place. In fact looking at the various statistical reports and comparing them against each other to check for accuracy shows that accomplishment data was consistently erroneous and/or lacking. For example, numbers of persons assisted did not include literature distribution or workshop attendance. Moreover, numbers reported in the quarterly reports consistently fail to match numbers reported in the CAPER reports.

As part of HUD's Program Year 2000 monitoring of the CDC, HUD noted that activities and actions of the CDC taken to address the impediments in the 1996 AI were satisfactory, though it also noted that the goal of assisting 6,000 persons by the Fair Housing Congress was not met in program year 2000. Instead, only 3,315 people were assisted. Efforts by the CDC to bring the Fair Housing Congress up to speed were never discussed.

The organizational restructuring of the fair housing service providers also presented problems for monitoring. The disbandment of the Fair Housing Congress and the merging of the WFHC and FHC/SGV resulted in a temporary situation that created confusions relating to service areas, responsibilities, and consistency in reporting, among others. These issues made monitoring difficult. The lack of monitoring has impacted the effectiveness of accomplishing the other strategies, by not allowing for enforcement mechanisms, thereby limited the CDC's ability to fully address the impediments identified in the 1996 AI.

**Strategy 6: Train testers to conduct standard and full-application testing.**

**Accomplishments:** During the first year of the implementation of the strategic plan, the Fair Housing Congress developed a standardized Fair Housing training program. In the subsequent years, tester trainings were conducted, though the numbers were not actually quantified until fiscal year 2000-2001, during which time 5 training sessions for testers were conducted. According to the FY 2001-2002 CAPER, 4 tester trainings were held in that year, though statistical reports generated from the Housing Rights Center indicate two tester trainings for new fair housing testers, and 7 refresher trainings for the Council's current trainers were conducted. According to the HRC, full application testing is difficult to perform because it negatively impacts the credit scores of the tester. Therefore, full application testing is seldom used as a technique, though it is a desired method stated in the CDC's Strategic Plan.

## Goal 3: Fair Housing Partnership

Establishing and fostering fair housing partnerships is a goal that is intended to help the County's fair housing program operate more efficiently in the long run, making more resources available for education and compliance.

### Strategy 1: Create a City/County Fair Housing Task Force.

**Accomplishments:** The County created the first City/County task force during FY 1998-1999. The task force consists of City and Commission staff and representatives from the contracting fair housing service providers. Two different committees were formed from the task force, one to focus on the Analysis of Impediments Study of 1996 and the other to focus on outreach and education efforts.

The Fair Housing Congress also created a landlord/tenant task force in 1997 consisting of the Apartment Association of Greater Los Angeles, the Legal Aid Foundation of Los Angeles, Inquilinos Unidos, Asian Pacific American Legal Service Center, San Fernando Valley Legal Services, Los Angeles Association of Realtors, Coalition for Economic Survival, and the Los Angeles Housing Department's Investigation and Enforcement, Inspections, and Policy and Planning units.

### Strategy 2: Foster a countywide Fair Housing Consortium.

**Accomplishments:** The Countywide Consortium was supposed to be initiated in Year Four according to the Five-Year Strategic Plan; however, there is little evidence that indicates this effort was successful. To a limited extent, workshops, seminars, and community meetings/presentations that included various stakeholders in the fair housing arena satisfy this goal; though it appears that the Strategic Plan had a more elaborate intent. This strategy is critical to the effectiveness of overall efforts, particularly if goals 6 and 14 of the 1996 AI, as discussed below, are to be achieved.

Developing a countywide consortium requires cooperation of all jurisdictions in the County, which is an aggressive undertaking. Only 48 cities fall within the Urban County program. The remaining 40 cities in the County are entitlement jurisdictions and typically do not coordinate with neighbor jurisdictions on HUD compliance matters. Creating a Countywide consortium requires willingness and leadership at the highest level of all local jurisdictions that appeared to be lacking from other potential partners when the CDC initiated this effort.

**Strategy 3: Assess the potential of a Regional Fair Housing Consortium.**

**Accomplishments:** The Regional Fair Housing Consortium, based on the effectiveness of the Countywide consortium, was supposed to be initiated in Year Five according to the Five-Year Strategic Plan; however, there is no evidence that indicates this effort was successful. In order for a regional consortium to be effective, the Countywide consortium would need to be strengthened first.

## Assessment/Conclusion

Assessment of the Fair Housing Strategic Plan can be approached from two separate levels. One, how well does the Strategic Plan align with the goals and strategies outlined in the 1996 AI? Two, to what extent the Strategic Plan was implemented and what are the gaps in implementation and services?

### Relationship between the Strategic Plan and the 1996 AI

The content of the Fair Housing Strategic Plan was drawn from the 1996 AI. As stated previously, the AI identified 18 impediments to fair housing choice and corresponding recommendations to overcome them. To varying degrees, the Strategic Plan addresses all of the impediments, either by incorporating the original recommendation in the AI or incorporating a modified version of the recommendation. In particular, the strategies described under the three goals of the Strategic Plan correspond to the 18 goals of the AI as follows:

Strategic Plan Goal	Goals from the 1996 AI
1. An Educated Community	3, 6, 10, 11, 13, 15, 16, 17
2. Compliance with Fair Housing Laws	2, 4, 5, 7, 8
3. Fair Housing Partnerships	1, 9, 12, 14

However, even though the Fair Housing Strategic Plan covers all of the 18 impediments to some extent, the Plan can be more explicit and thorough in addressing the following two goals outlined in the 1996 AI:

**Goal 6:** Strengthen links between minority homebuyers and banks.

**Goal 14:** Reduce forced African-American segregation.

For instance, a long-term strategy established in the AI to address Goal 6 is to develop and foster an aggressive, creative outreach program on lending through various media to minority communities. The Strategic Plan does not include such a pro-active statement; it simply indicates that “Latinos and African-Americans will receive information on access to home financing and that the Commission will explore involving conventional lenders and the Los Angeles Community Development Bank in the training process.” Survey results and research also suggest that the County needs to be more active in educating Latinos and African-Americans about homeownership, and assisting them in becoming homeowners.

Similarly, to reduce forced African-American segregation (Goal 14), the AI recommends conducting a systematic analysis of the costs and benefits of a large-scale program which would experiment with various subsidies and education programs to enhance mobility. The Strategic Plan does not explicitly recommend doing such an analysis. Instead, it suggests that if a Countywide Fair Housing Consortium is established, one of the issues it should examine is how to reduce the forced segregation of African-Americans. Thus, it appears that the County will need to make more deliberate attempts to improve residential mobility among African Americans.

### Implementation of the Strategic Plan

As indicated above, the CDC has made progress in meeting the three goals of the 1998-2003 Fair Housing Strategic Plan. In particular, the CDC, in partnership with fair housing services providers, has significantly increased awareness of fair housing services and laws throughout Los Angeles County. Nevertheless, further progress can be made to ensure compliance with fair housing laws and improve the accessibility of housing. For example, additional outreach and education are necessary to help residents know how and where they can report incidents of discrimination and assure them reporting makes a difference. As indicated by the results of the Housing and Community Development Needs Survey that includes fair housing concerns, most respondents who indicated having experienced housing discrimination never reported the incidents and many feel that reporting makes no difference to their situations. Publicizing the results of Fair Housing accomplishments by the service providers was a goal of the strategic plan that was never enforced or monitored, which may have hindered the outreach efforts of both the service providers and the CDC, thereby limiting the effectiveness of the implementation of the Strategic Plan.

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See Chapter 2,  
Community Outreach,  
for results of the  
Housing and  
Community  
Development Needs  
Survey.

Using the paired method of testing, HUD conducted a study of housing discrimination covering the years of 1998 to 2000. The Los Angeles Primary Metropolitan Statistical Area (PMSA) was included in the testing process. The report indicated incidence at rates of 22 percent for rental and 15 percent for sales for Black home seekers and rates of 24 percent rental and 17 percent sales for Hispanics. Compared to the national average, the results for Los Angeles were similar in rentals and slightly lower in sales (22 percent rental/17 percent sales for Blacks and 26 percent rental/20 percent for Hispanics).<sup>1</sup> The overall results of the study indicate that Hispanic renters are now more likely to experience discrimination in their search for housing than Blacks. Considering the demographics of Los Angeles, the potential implications may be widespread.

As stated, the County’s Strategic Plan goal was aimed at assisting 30,000 people (6,000 people per fiscal year). However, reports from the various agencies seemed to indicate that performance fell short of this goal (Table 7-3).

**Table 7-3**  
**Persons Assisted with Direct Services**

FY1998-99	FY1999-00	FY2000-01	FY2001-02
2,194	2,000	3,315	4,467

While these figures appear low, they do not take into account literature distributions, workshop attendance, booths, community presentation attendees, etc. In fact, if one takes into account literature distribution figures, the goals were greatly exceeded. For example, the 2000-2001 CAPER reported 16,783 pieces of literature were distributed during that fiscal year. The narrative sections of the County’s CAPER do not lend much insight into the accomplishments of the fair housing services provided to the County’s residents, because the text narrative expanding on the numbers provided by the Fair Housing Congress is limited.

In reviewing the quarterly reports submitted to the CDC by the Fair Housing Congress (fair housing service provider at the time), it appears that record keeping was inconsistent, at times duplicative or omitted. The narrative portions of the report also lacked sufficient detail for monitoring of performance. In addition, resolutions of complaints were rarely reported. The County mentioned in the Strategic Plan that effective documentation, beginning with a complaint log, would help the Commission assess the effectiveness of the fair housing strategic plan activities, but the structure and detail of this log were never solidified, which may be one of the reasons reporting efforts are so inconsistent. In

<sup>1</sup> *Discrimination in Metropolitan Housing Markets 1989-2000 Report*, HUD website.

fact, the quarterly reporting form is somewhat generic to allow each agency to expand on its accomplishments as each sees fit, without regard to the specific information desired by the CDC.

Prior to FY 2002-2003, the CDC contracted fair housing services with the Fair Housing Congress, a consortium of fair housing service providers serving the greater Los Angeles area. Fair Housing Congress included member agencies such as the Westside Fair Housing Council, Fair Housing Council of San Gabriel Valley, and Fair Housing Council of San Fernando Valley. In 2001, the Fair Housing Congress became defunct and Westside Fair Housing Council merged with the Fair Housing Council of San Gabriel Valley to form the Housing Rights Center (HRC). Together with the other two councils as subcontractors, the Housing Rights Center was awarded a one-year contract to provide services beginning July 1, 2002.

While the Strategic Plan addresses all of the impediments of the 1996 AI in writing, a serious gap in monitoring the achievements of the Fair Housing Service providers, and overall implementation accomplishments, has reduced the effectiveness of actually fulfilling the County's desired objectives.

The dissolution of the Fair Housing Congress caused the CDC to contract with the HRC for fair housing services, who in turn subcontracts with the Fair Housing Council of San Fernando Valley (FHC/SFV) and Fair Housing Foundation of Long Beach (FHFLB) to serve specific geographic areas. This reorganization improves services within the HRC service area. However, greater coordination among the HRC, FHC/SFV, and FHFLB is still needed.

Currently, different geographic areas within the County receive different levels of services. While efforts have been expended in making intake forms consistent and databases more elaborate, the three agencies have different styles of outreach, reporting capabilities, and levels of service that make services inconsistent among the different service areas. In addition, detailed information on outreach efforts and investigation results in the unincorporated areas of the County is lacking.

It appears that a focus has been given to the participating cities, leaving the unincorporated areas unaccounted for, even though achievements in these areas may have been made. As cities have the option to contract separately for services, which the unincorporated areas do not, this practice may not accurately reflect the specific issues in the various unincorporated areas. While the County's Strategic Plan and associated contracts indicate that testing would be conducted in the unincorporated areas, investigation results for these areas have not been reported. Thus, the County may need to adjust the scope of work in the fair housing service provider's contract to be more specific, and/or improve its monitoring efforts to enforce these efforts.

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