

# Analysis of Impediments Statewide Collaboration

**Mississippi Home Corporation**

Special Achievement: SA

## **HFA Staff Contact**

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## **Innovation**

Never before in the United States has an entire state engaged in a comprehensive statewide collaborative effort to identify and analyze the nature and extent of barriers to fair housing through an Analysis of Impediments to Fair Housing Choice (AI).

Factors that set the stage revolved around the need for a uniform approach to address the state's impediments to affordable housing. The process initially required by HUD was demanding and costly for local governments and public housing authorities. Often times in the past, these entities struggled to complete these comprehensive housing studies alone due to staff capacity and limited resources.

The Mississippi Home Corporation (MHC) set out to encourage all of the state's other 57 entitlement entities to work together to complete a statewide effort that would create a holistic partnership to better identify impediments to fair housing choices statewide.

MHC's previous working relationships with these statewide entities lead to the collaboration of other housing providers, namely the Mississippi Association of Housing and Redevelopment Officials (MAHRO). Their association represents the state's 50 local and regional housing authorities. Leaders at MAHRO immediately recognized the value of working with MHC to complete the statewide AI.

Recognizing that a relationship together could save all the partners a considerable amount of time and money, MHC set out to also include the entitlement cities of Jackson, Hattiesburg, Gulfport, Biloxi, Moss Point, and Pascagoula. These are the six largest cities in the state who have been resigned in the past to complete their AIs alone.

Over several months of negotiations, the collaboration was born and earnestly began the task of developing the first statewide AI to assist Mississippi's most vulnerable populations. Being the state's largest funder of affordable housing with experience related to HUD, made the decision for MHC to serve as the lead entity that much easier.

MHC's primary orienting concept was to break down silos that existed between agencies and to use data and analytics to shape smarter policies to fund programs. The collaboration set out to set metric outcomes that had more impact on VLI households. Going in, everyone agreed that a need existed to determine how housing could work better by using supportive services for the disabled and how those services could work better with stable housing.

Before the final draft of the AI was submitted to HUD for approval, transportation emerged as a critical barrier, especially for persons with disabilities. MHC approached the Mississippi Department of Transportation (MDOT) about findings discovered in the analysis of impediments. MDOT was immediately impressed by the breadth of information discovered and agreed to work together to find solutions where improvements to public transit could be made.

To date, MHC and MDOT have identified several areas in the state to implement pilot programs targeted to increasing ridership in communities with large concentrations of low-income households without access to transportation.

### **Responds to an Important State Need**

The contributing factors identified in the statewide AI influenced MHC's completion of the state's five-year Consolidated Plan in May 2020. This policy plan outlined a 20-step recommended action process for using the state's \$75 million in HOME funds to overcome the barriers of affordable housing identified in the AI.

By cutting across traditional program lines, every entitlement entity statewide signed a collaboration agreement with MHC for a common cause. Through collaboration on this monumental task, all of the state's partners had access to current and reliable information for their communities in real-time which cut down on delays and bureaucratic red tape.

Costs as a group were a fraction of what they would have been individually with smaller partners investing no more than \$997 and larger ones like the City of Jackson paying no more than \$3,997. As the state's largest recipient of HUD dollars, MHC's share was one-third of the entire cost.

MHC's determined approach was to more effectively and efficiently incorporate into planning processes the duty to affirmatively further the purposes and policies of the Fair Housing Act, which not only prohibits discrimination but, in conjunction with other statutes, directs HUD's program participants to take significant actions to overcome historic patterns of segregation, achieve truly balanced and integrated living patterns, promote fair housing choice, and foster inclusive communities that are free from discrimination.

Mississippi has the largest percentage of disabled persons in the nation, so the challenges faced by the disabled were paramount to determine where sufficient accessible supplies of housing did not exist. Findings determined through the AI process lead to a set of policy changes within the state's five-year consolidated plan to steer more funding to actions that will result in the development of more affordable housing options statewide for them.

### **Achieve Intended Results**

In developing the strategy to complete the statewide AI, MHC had conversations with HUD Fair Housing staff about requirements. HUD staff commented that Mississippi's process included an unprecedented number of agencies and jurisdictions. Throughout the process, state HUD officials became valuable partners providing timely guidance.

The statewide effort soon caught the attention of HUD officials nationwide and in early 2019, HUD Regional FHEO Director, Carlos Osegueda visited MHC and HUD Assistant Secretary, Anna Maria Farias visited in April 2019. Both HUD officials recognized this collaborative effort as a model for other states to replicate nationwide.

To achieve the intended results required, community participation, consultation, and coordination were paramount. An analysis of data was used to assess significant disparities in access to opportunity and disproportionate housing needs for protected classes in each jurisdiction.

Statewide discussions included significant contributing factors for segregation, Racially or Ethnically Concentrated Areas of Poverty (RECAPs), disparities in access to opportunity, and disproportionate housing needs, including significant fair housing issues related to publicly supported housing, disability and access, and fair housing enforcement.

A prioritization of the contributing factors identified for each fair housing issue and a justification for the prioritization was established in each jurisdiction. In prioritizing such factors, program participants gave highest priority to those factors that limit or deny fair housing choices and access to opportunity, or negatively impact fair housing or civil rights compliance.

Each program partner identified fair housing goals that will be used to overcome the effects of the prioritized contributing factors and related fair housing issues, including a description of how the goals relate to overcoming the contributing factors and identification of the metrics and milestones for determining what fair housing results will be achieved and the timeframes for achieving them.

### **Provide Benefits that Outweigh Costs**

The benefits of conducting the AI through a statewide collaboration could not be more evident than in the fact that more than 4,000 fair housing surveys were returned statewide leading to the most comprehensive insight of public opinion related to barriers associated with affordable housing ever conducted in the state of Mississippi.

The Fair Housing Survey disseminated statewide on-line and through direct mail contained over 50 questions related to fair housing issues including segregation and discrimination. On MHC's website, the survey was available in 104 different languages. Printed versions mailed out were created in English, Spanish, and Vietnamese owing to Mississippi's large Vietnamese population along the Gulf Coast.

A Citizen Engagement Toolbox (CET) was created to focus group meeting discussions during the Public Input meetings. A Disability and Access Work Group webinar series was presented with transcripts being created from each meeting and summarized for public dissemination.

Public announcements were made twice by each partner in statewide newspapers and through social media outlets managed by MHC and on each partner's websites. Some even hand-delivered information to schools, churches, and local governments for participation.

Each of the partners in conjunction with MHC held a Fair Housing Public Input meeting. This created an opportunity for the public to provide commentary about fair housing issues impacting their communities. MHC facilitated 36 of the state's 64 Fair Housing Public Input meetings statewide with an estimated 1,000 people in attendance.

Participants at statewide public meetings were able to paint a better picture for us in describing locations where disparities in access to opportunity were experienced.

By working collaboratively with every housing authority and the state's six largest cities, MHC was able to create the state's most highly detailed housing analysis ever developed that has shaped policy changes to drive new program initiatives and funding projects for the next five years.

**Visual Aids**

Statewide partners met with HUD's Region IV FHEO Director Carlos Oseguedo at MHC Offices in February 2019.



Statewide partners met with HUD's Assistant Secretary of Fair Housing and Equal Opportunity Anna Maria Farias in Jackson, Mississippi in April 2019.



MHC makes a presentation at HEED's 30<sup>th</sup> Annual Fair Housing Conference with HUD's Region IV Director, Denise Cleveland-Leggett in Jackson, Mississippi in April 2019.



Presentation slide used to welcome participants at each of MHC's 36 statewide Fair Housing Public Input meetings.



**2019 MS Analysis of Impediments  
To Fair Housing Choice (AI)**  
Sponsored by the  
**Mississippi Home Corporation  
Mississippi Development Authority  
And Others**

**Welcome to the Fair Housing Forum!**

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Mississippi Fair Housing Forums 1 October 26, 2018



Presentation slide used to describe the fair housing issues to be discussed in each community.



## What is to be Studied

### HUD's Fair Housing Issues


1. Segregation analysis
2. RCAP and ECAP evaluation
3. Disparities in access to opportunity
4. Disproportionate housing needs
5. Publicly supported housing analysis
6. Disability and access analysis
7. Fair housing enforcement, outreach, etc

RCAP:  
Racially  
Concentrated  
Areas of  
Poverty

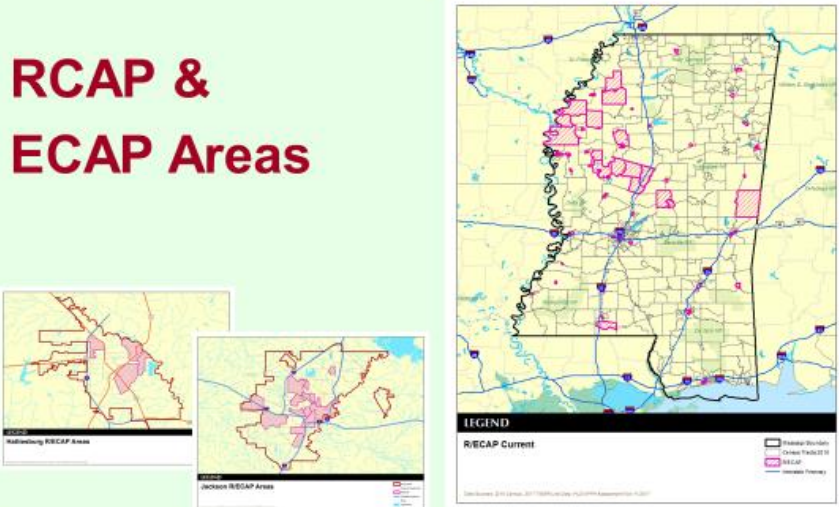
ECAP:  
Ethnically  
Concentrated  
Areas of  
Poverty

Mississippi Fair Housing Forums 16 October 26, 2018

Presentation slide used to show areas of Racially or Ethnically Concentrated Areas (R\ECAPs) statewide with inlays from each community where a public input meeting was held.



## RCAP & ECAP Areas



MS Disability and Access Work Group 8 October 18, 2018



**Concluding Results from the Analysis of Impediments to Fair Housing Choice identified these contributing factors that serve as barriers to the access of fair and affordable housing identified by priority statewide in Mississippi.**

Contributing Factors	Priority	Justification
Discriminatory patterns in lending	High	Minority households tend to have higher rates of mortgage denials than white households, as seen in 2008-2016 HMDA data.
Failure to make reasonable accommodation	High	HUD Fair Housing Complaint data suggests that failure to make reasonable accommodation was the most cited issue for complaints statewide.
Lack of access to housing for homeless and released from incarceration	Medium	Public input and the homeless and vulnerable population analysis revealed that homeless, persons recently released from incarceration, and transition-age foster youth have limited access to housing option throughout the State.
Lack of access to independence for persons with disabilities	High	Public input, the Disability and Access workgroup, and the Disability and Access Analysis revealed that households with disabilities have limited access to options that increase their independence.
Lack of opportunities for persons to obtain housing in higher opportunity areas	High	Access to higher opportunity areas is limited for many households due to income, transportation, and a variety of factors.
Moderate to high levels of segregation	High	The dissimilarity index shows a moderate to high level of segregation for minority households.
Moderate to high concentrations of poverty	High	Concentrations of poverty, as demonstrated by R/ECAPs in the area, continue to be a contributing factor in accessing fair housing.
Lack of resources	High	Lack of resources continues to be a high rated contributing factor, as noted by Stakeholder Consultation meetings and public input.
Insufficient affordable housing in a range of unit sizes	High	The prevalence of cost burden, especially for lower income households, demonstrates the continued need for affordable housing options in a range of unit sizes.

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Insufficient accessible affordable housing	High	The Disability and Access workgroup and Disability and Access analysis, coupled with a high disability rate particularly for the elderly population, demonstrated a lack of accessible affordable housing to meet current and future demand.
Lack of fair housing structure	High	Fair housing survey results and public input indicated a lack of fair housing structure.
Insufficient fair housing education	High	Fair housing survey results and public input indicated a continued need for fair housing education.
Insufficient understanding of credit	High	Fair housing survey results and public input indicated an insufficient understanding of credit.

**MHC's Recommended Actions to be Taken submitted to HUD to overcome Mississippi's contributing factors that serve as barriers to the access of fair and affordable housing identified by priority statewide at the conclusion of the Analysis of Impediments to Fair Housing Choice statewide.**

Fair Housing Issues/ Impediments	Contributing Factors	Recommended Actions to be Taken
<b>Segregation</b>	Moderate to high levels of segregation	<p>Seek to develop 475 affordable housing units outside of R/ECAPs, over five (5) years for households below 80% of Area Median Income.</p> <p>Support non-profit homebuyer organizations to provide financial counseling and training to 300 prospective homebuyers annually.</p>
<b>Disparities in Access to Opportunity</b>	<p>Discriminatory patterns in lending</p> <p>Discriminatory terms/conditions</p> <p>Lack of Access to Housing</p>	<p>Seek to support purchase of 300 owner housing units affordable to households below 80% of Area Median Income in low poverty areas and areas with proficient schools, over five (5) years.</p> <p>Work with HOPE Enterprise Corporation to extend best practices in financial education and strengthening credit and responsible loan products to individual households in more markets in the state.</p> <p>Ensure non-profit agencies providing homebuyer down payment assistance under HOME provide financial counseling and training to prospective homebuyers.</p> <p>Encourage agencies providing homebuyer financial training to offer workshops and online homebuyer preparation that are widely accessible to households across the state.</p> <p>Work with partners to provide landlord tenant fair housing education information to local units of government and provide fair housing education outreach information at scheduled trainings and workshops annually.</p> <p>Conduct mobility workshops with various partnering agencies annually. Keep record of workshops.</p>

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<b>Disparities in Access to Opportunity</b>	Lack of access to independence for persons with disabilities	Promote access to housing programs for special needs households, including reviewing potential barriers to access of publicly supported housing and of access to financial services within first 24 months of this AI.
	Lack of access to housing for persons homeless or released from incarceration	Work with housing partners and American Heart Association, Partnership for Healthy Mississippi, and others to determine feasibility of implementing a Healthy Living Program to engage residents at risk of and/or currently living with chronic health conditions, such as heart disease, stroke, high blood pressure, diabetes, high cholesterol, or obesity related illnesses and their caregivers to change lifestyle to reduce risk of future disabling conditions.
	Lack of Reasonable Accommodation	Coordinate efforts with regional homeless organizations to increase access for homeless households to publicly supported housing. Seek to provide rapid re-housing funding for 4,000 households over five (5) years.
	Lack of opportunities for persons to obtain housing in higher opportunity areas	Work with local and state institutions to fund housing units targeting persons exiting incarceration, with goal of producing 35 units within five (5) years.
		Work with partners to enhance or establish resident services programs to house at least 20 youth in five (5) years.
		Work with Mississippi Department of Transportation to increase access to transportation for residents of publicly supported housing.
		Work with partners to provide computer classes/labs, afterschool programs for youth, financial literacy, nutrition workshops, and enrichment activities annually.
		Work with Mississippi Association of Housing and Redevelopment Officials (MAHRO) to encourage HUD to review and modify resident bedroom requirements of Rental Assistance Demonstration (RAD) program to better utilize housing resources for homeless so that unoccupied multi-bedroom units can accommodate homeless families.

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<b>R\ECAPs</b>	<p>Moderate to high levels of segregation</p> <p>Moderate to high concentrations of poverty</p>	<p>Seek to develop affordable housing units outside of R/ECAPs, over five (5) years. (Unit production shared with goal addressing R/ECAPs under Segregation)</p> <p>Work with HOPE Enterprise Corporation to explore coordinating financing to fill financing gaps for housing development in R/ECAPs.</p>
<b>Disproportionate Housing Needs</b>	<p>Insufficient affordable housing in a range of unit sizes</p> <p>Discriminatory patterns in lending</p> <p>Increase independence for persons with disabilities</p>	<p>Preserve affordable housing options through owner-occupied and rental rehabilitation. Seek to provide rental and homeowner housing rehabilitation for 400 units over five (5) years.</p> <p>Provide financial counseling and training to prospective homebuyers at least twice a year. Seek to provide first-time homeowner assistance to households below 80% of Area Median Income over the course of five (5) years. (Unit production shared with goal addressing Discriminatory Patterns in Lending.)</p> <p>Work with partners to provide landlord tenant education information on fair housing law to local units of government and provide education outreach information at scheduled trainings and workshops at least annually.</p> <p>Work with entities operating federally funded rental housing to provide input to transportation plans to expand access to public transportation for residents with disabilities.</p> <p>Work with partners to conduct workshops about ways to expand mobility workshops with various partnering agencies annually. Keep record of workshops</p>
<b>Publicly Supported Housing</b>	<p>Insufficient affordable housing in a range of unit sizes</p>	<p>At least 5% of housing units, housing vouchers, or equivalent assistance supported with federal funds subject to the State Consolidated Plan will be designated for persons who are homeless or have a disability including serious mental illness. Entities managing such housing funds will establish methods for establishing local goals and processing referrals of eligible persons from coordinated entry systems operated by Continuum of Care agencies. Seek to house 1,700 households over 5 years.</p>

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<b>Publicly Supported Housing</b>	Insufficient accessible affordable housing  Concentration in or near R/ECAPs	Work with Public Housing Authorities to develop housing outside of R/ECAPS.
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Fair Housing Survey provided in Vietnamese along the Mississippi Gulf Coast

## BẢNG KHẢO SÁT VỀ GIA CƯ BÌNH ĐẲNG 2018



Tiểu Bang Mississippi, 6 thành phố ủy nhiệm (biểu thị qua các huy hiệu bên trên), và 50 Cơ Quan Thẩm Quyền về Gia Cư Công Cộng mới đây đã thực hiện một cuộc nghiên cứu mang tên "Phân Tích về Những Khiếm Khuyết" [AI]. Bản Nghiên Cứu do Bộ Gia Cư và Phát Triển Đô Thị [HUD] đòi hỏi như một điều kiện để nhận được các ngân khoản tài trợ gia cư và phát triển cộng đồng từ liên bang.

Tiến trình AI bao gồm việc thu thập ý kiến quần chúng trong khắp tiểu bang, cũng như những ai liên hệ đến phạm vi gia cư, kể cả những người thuê nhà và gia chủ. Do đó, bạn đã được mời tham gia vào việc khảo sát để cung cấp những ý kiến và kinh nghiệm của bạn về vấn đề gia cư bình đẳng.

Các câu trả lời ẩn danh của từng bạn chỉ được báo cáo chung trong bảng tổng kết với mọi câu trả lời của những người khác. Cảm ơn bạn đã dành thời giờ tham gia. Xin bạn vui lòng điền vào ô thích hợp bên dưới.

**1. Bạn đang ở đâu: (Xin chọn một)**

- ☐ Biloxi
- ☐ Gulfport
- ☐ Hattiesburg
- ☐ Jackson
- ☐ Moss Point
- ☐ Pascagoula
- ☐ Nơi nào khác trong Mississippi, xin chỉ danh rõ \_\_\_\_\_

### CỘNG ĐỒNG CỦA BẠN

**2. Câu nào mô tả đúng nhất loại nhà bạn đang ở? (Xin chỉ chọn một)**

- ☐ Nhà biệt lập
- ☐ Nhà song lập
- ☐ Condo/Townhouse
- ☐ Phòng trong cao ốc 1-4 tầng
- ☐ Phòng trong cao ốc từ 5 tầng trở lên
- ☐ Loại khác, xin chỉ danh rõ \_\_\_\_\_

**3. Bạn ở đây bao nhiêu năm** \_\_\_\_\_

**4. Nếu bạn ở nhà được tài trợ hay phục dịch, xin cho biết loại**

- ☐ Gia cư công cộng
- ☐ Nhiều gia đình chương trình 8
- ☐ Thuê nhà chương trình 8
- ☐ Theo dự án chương trình 8
- ☐ Các loại nhà phục dịch khác
- ☐ Không biết
- ☐ Không áp dụng
- ☐ Loại khác \_\_\_\_\_

Bạn có thể vào mạng:

<https://www.research.net/r/2018MSFairHousingSurvey>

**5. Nếu bạn đang ở trong khu gia cư công cộng, hoặc dùng tín phiếu, bạn có biết tên của cơ quan quản trị gia cư không?**

**6. Bạn ở khu này bao lâu rồi?**

- ☐ Dưới 1 năm
- ☐ 1-5 năm
- ☐ 6-10 năm
- ☐ 11-20 năm
- ☐ 21-30 năm
- ☐ Trên 30 năm

**7. Lý do nào quan trọng nhất trong việc bạn chọn khu vực bạn đang cư ngụ? (Đánh dấu mọi mục ứng dụng)**

- ☐ Sống gần gia đình và bạn bè
- ☐ Gần chỗ làm
- ☐ Gần nơi mua sắm và dịch vụ
- ☐ Gần phương tiện giao thông công cộng
- ☐ Tiện dụng về mặt thể chất
- ☐ Gần trường học cho con/cháu
- ☐ Dễ có cơ hội tìm việc làm
- ☐ An toàn trong khu vực
- ☐ Giá cả nhà cửa thấp
- ☐ Tôi lớn lên ở đây
- ☐ Không lựa chọn/Không có nơi nào khác
- ☐ Các lý do khác (Xin chỉ danh rõ): \_\_\_\_\_

**8. Bạn cảm thấy mức độ an toàn thế nào khi đi bộ trong khu vực lúc ban ngày?**

- ☐ Rất an toàn
- ☐ An toàn
- ☐ Thiếu an toàn
- ☐ Không an toàn

**9. Bạn cảm thấy mức độ an toàn thế nào khi đi bộ trong khu vực lúc ban đêm?**

- ☐ Rất an toàn
- ☐ An toàn
- ☐ Thiếu an toàn
- ☐ Không an toàn

**10. Bạn cảm thấy mức độ an toàn thế nào khi đi bộ trong khu vực phát triển gia cư công cộng lúc ban ngày?**

- ☐ Rất an toàn
- ☐ An toàn
- ☐ Thiếu an toàn
- ☐ Không an toàn
- ☐ Không áp dụng

**11. Bạn cảm thấy mức độ an toàn thế nào khi đi bộ trong khu vực phát triển gia cư công cộng lúc ban đêm?**

- ☐ Rất an toàn
- ☐ An toàn
- ☐ Thiếu an toàn
- ☐ Không an toàn
- ☐ Không áp dụng

**12. Nếu bạn có thể chọn, bạn có tiếp tục ở khu vực hiện tại không?**

- ☐ Có
- ☐ Không
- ☐ Không chắc

Xin vui lòng diễn tả tại sao bạn nghĩ như thế: \_\_\_\_\_