

Analysis of Impediments to
Fair Housing Choice

This document is the City of St. Cloud's Analysis of Impediments to Fair Housing Choice (AI) covering the five-year Consolidated Planning period of 2020 to 2025.

City of St. Cloud, Minnesota | DRAFT FOR PUBLIC COMMENT
January 2020

Table of Contents

Executive Summary

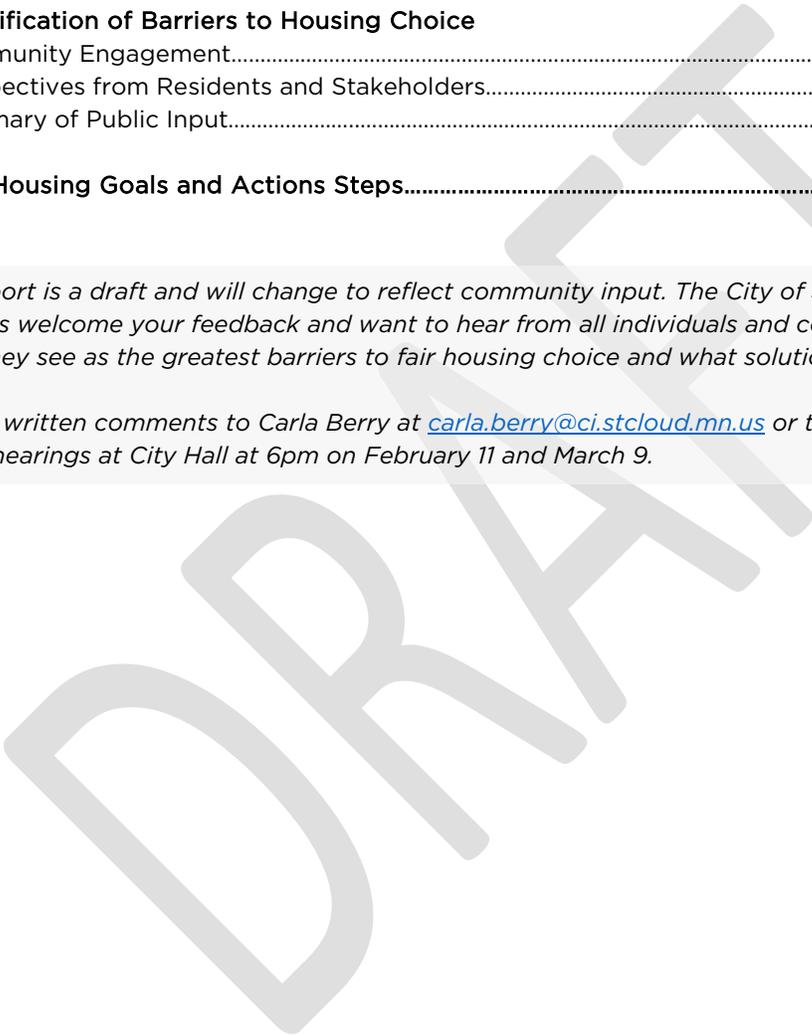
- I. **Data Analysis**
 - Demographic Summary and Trends.....8

- II. **Identification of Barriers to Housing Choice**
 - Community Engagement.....14
 - Perspectives from Residents and Stakeholders.....14
 - Summary of Public Input.....16

- III. **Fair Housing Goals and Actions Steps.....18**

The report is a draft and will change to reflect community input. The City of St. Cloud and community partners welcome your feedback and want to hear from all individuals and community organizations on what they see as the greatest barriers to fair housing choice and what solutions would be most effective.

Submit written comments to Carla Berry at carla.berry@ci.stcloud.mn.us or testify at the upcoming two public hearings at City Hall at 6pm on February 11 and March 9.



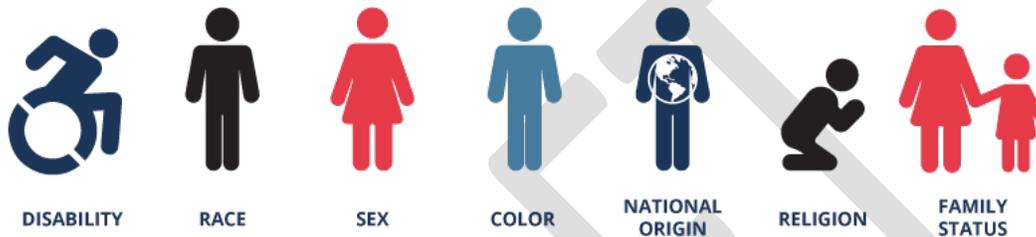
Executive Summary

DRAFT

Executive Summary

This document is the City of St. Cloud's Analysis of Impediments to Fair Housing Choice (AI) covering the five-year Consolidated Planning period of 2020 to 2025. The City of St. Cloud is required to assess barriers to housing choice with development of its five-year Consolidated Plan for federal block grants funding for housing and community development. The City of St. Cloud is a direct recipient of Community Development Block Grant (CDBG) annual funds.

The Fair Housing Act was originally passed in 1968 to protect buyers and renters from discrimination from sellers and landlords by making it unlawful to refuse the sale or rental of a property to persons included under the category of a protected class. The Fair Housing Act prohibits discrimination against persons based on their **race, color, religion, sex, national origin, disability, or familial status** in the sale, rental, and financing of housing.



HUD defines "fair housing choice" as

"The ability of persons, regardless of race, color, religion, sex, national origin, familial status, or handicap, of similar income levels to have available to them the same housing choices."

Community Engagement Opportunities

In addition to an analysis of publicly available demographics and socioeconomic data, HUD-provided data, and review of state, regional and local studies, the City of St. Cloud's AI provided opportunities for residents and stakeholders to share their experience with housing affordability and fair housing choice. As local population shifts, and economic trends grow, fair housing experiences vary drastically between jurisdictions and resident perspectives. Therefore, the City took a comprehensive approach in assessing fair housing choice for City residents through data analysis and community engagement efforts that included:

- A review of the 2015 Analysis of Impediments to Fair Housing Choice, the City's Land Development Code, the 2015 St. Cloud Comprehensive Plan as well as review of the 2015-2020 Consolidated Plan, including the City's Annual Action Plans and Consolidated Annual Performance Evaluation Reports covering that period.
- A review of the St. Cloud Public Housing Authority's Five Year and Annual PHA Plans.
- A review of the most recent demographic data for the City from the U.S. Census, which included general, demographics, housing, economic, social, and disability characteristics. Also, review of the U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy (HUD-CHAS) data.
- Neighborhood engagement through open house formats to listen to community needs regarding housing availability and choice.
- In-depth interviews focused on key groups of stakeholders including home builders and realtors, human rights advocates, multi-family builders and property managers, non-profit stakeholders, shelter and transitional housing experts and community stakeholders – 40 participated.
- The development of Comprehensive Housing Needs Analysis for the City of St. Cloud, Minnesota.

- A comprehensive Community Housing Survey focusing on low-to-moderate income residents including public housing - 207 participated.
- Review and analysis of information collected at Project Connect event held October 2019 as it pertains to housing choice - 411 participated.
- CDBG Strategic Planning Session held to inform and engage service providers, non-profits and community organizations that serve and support low-to-moderate income persons in identifying strategies that address the most pressing and community needs over the next five years - 35 participated.
- Discussion and engagement with several working groups such as the United Way Housing Group and Whitney Senior Center Advisory Board as well data presentations at service organizations and housing professional networks such as the Central Minnesota Builders Association.
- A public comment period including wide distribution of draft materials and two public hearings.

Summary of Data Trends

More detailed findings are described fully in the following sections below. This is a summary of key data trends as it may pertain to fair housing choice and the state of current and future housing in St. Cloud.

- The City is estimated to have increased its population by 4,397 people (6.7%) and 1,690 households (6.6%) between 2010 and 2018. Between 2020 and 2030, St Cloud city's population is expected to increase by 11.1% (7,810 people) while the number of households is expected to increase by 9% (2,494 households).
- The City can expect to see continued population growth due to its role as both an educational and employment hub for Central Minnesota. More people are likely to choose to locate near their place of work as increasing transportation costs increase the desirability of living close to employment. However, this all depends on whether desired housing types are offered within city limits.
- Growth in the City is projected to occur in all age cohorts except 18 to 24-year olds (-5.5%) and 45 to 54-year olds (-9.0%) between 2010 and 2023, due to overall long-term demographic trends. The greatest percentage growth is projected to occur among people age 75 to 84 years (31.9%).
- St Cloud city had an estimated median household income of \$45,725 in 2018, which is projected to increase to \$51,879 over the next five years. There are 3,260 non-senior households (15% of households with incomes less than \$15,000), many of which are eligible for deep-subsidy rental housing. Median incomes for households in the City peak at \$67,856 for the 45 to 54 age group in 2018.
- The rate of homeownership typically increases with a rise in income. Homeownership in the City increased from 18.6% of households with incomes below \$15,000 to 90.4% of households with incomes at or above \$100,000.
- Between 2010 and 2018, St Cloud city experienced an increase in all household types except roommate households, which decreased by -9.6%, a part of which can be attributed to a decrease in enrollment at SCSU.
- An estimated 68.6% of renter households in the City in 2018 had either one or two people.
- In 2018, "White Alone" (81.8%) comprised the largest proportion of the population in the City, but this proportion had decreased since 2010, signaling greater diversity in the community. "Black or African American Alone" experienced the largest percentage growth between 2010 and 2018 in the City, increasing by 62.3% from 4,625 to 7,507 people.
- A greater proportion of younger age cohorts (a large student population) tended to move compared to older age cohorts. An estimated 67.1% of those age 18 to 24 moved within the last year compared to only 9.4% of those age 75+.

Fair Housing Goals and Action Steps

Goal A – Increase Supply of Affordable Housing.

1. Provide assistance to preserve existing affordable housing and to create new affordable housing.
2. Assure the availability of adequate sites for the development of affordable housing.
3. Develop strategies to mitigate or preserve affordable multi-family units at risk of conversion to market rate units.

Goal B – Expand Access to Housing for Persons with Disabilities and/or In Need of Special Services.

1. Provide assistance and resources to make accessibility improvements to affordable housing.
2. Support local advocate agencies and service providers to provide resources to transition persons to independent living settings.

Goal C – Improve Awareness and Utilization of Fair Housing Resources.

1. Support efforts to educate persons, including occupants, owners, and agents of both rental and purchase units regarding their fair housing rights and responsibilities.
2. Support local advocate agencies and community stakeholders in efforts to disseminate fair housing information to the community at large.

DRAFT

Section I.

Data Analysis

DRAFT

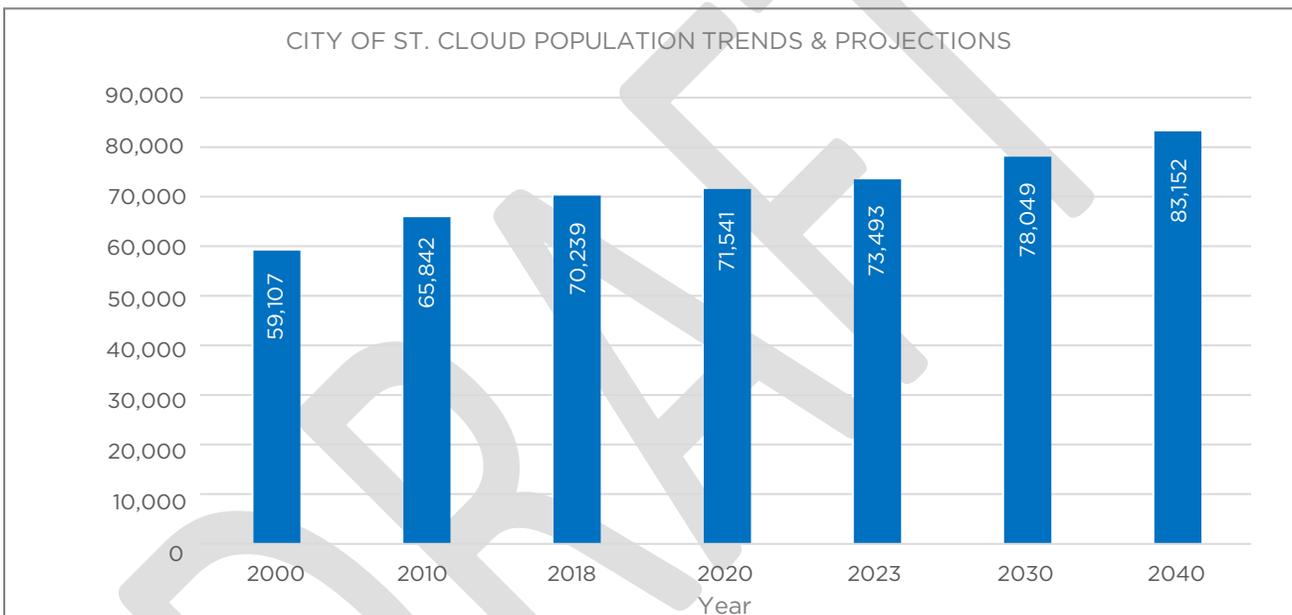
SECTION I.

Data Analysis

Data analysis is the starting point for the fair housing analysis. It provides information on the drivers of housing choice and need – population, income, household characteristics, age, diversity, poverty and disability. The section also intersects demographic indicators, which may be linked to current and future fair housing issues, by discussing demographic trends and local housing projections. In addition to analyzing trends for the City of St. Cloud, the data examines regional trends. A Primary Market Area (PMI) includes: Sartell, Sauk Rapids, Waite Park St Augusta, St Joseph, Haven Township, Sauk Rapids Township, Le Sauk Township, St Joseph Township, St Wendel Township, and Minden Township. Additional analysis was performed for the Tri-County Area of Benton, Sherburne and Stearns counties.

Population

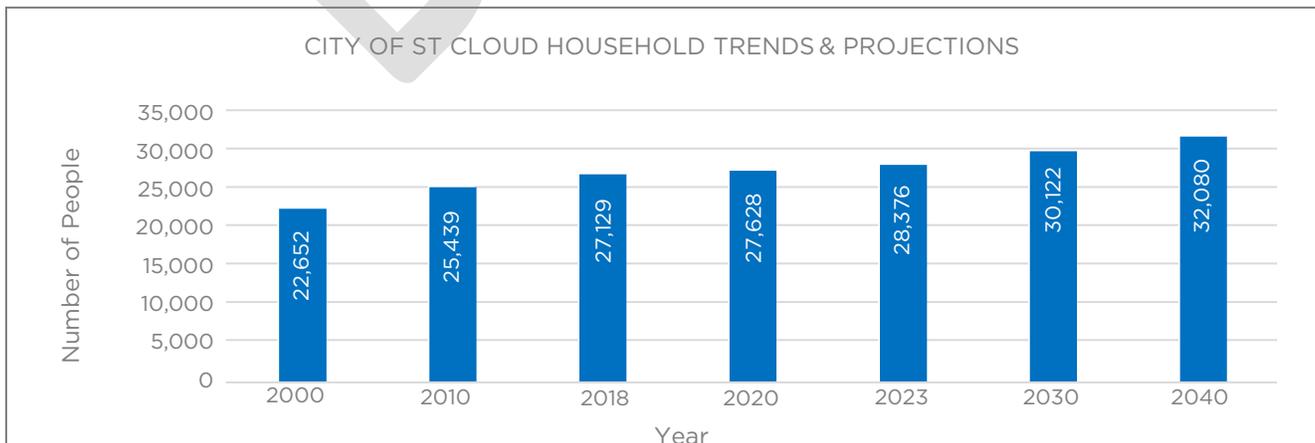
- St Cloud city’s population is estimated to have increased by 4,397 people (6.7%) between 2010 and 2018. It is projected that the City of St Cloud will add 5,699 people (8.7%) between 2010 and 2020 and another 6,508 people by 2030 (9.1%). Between 2030 and 2040, St Cloud city is forecasted to add 5,103 people (6.5%).



Source: St. Cloud Comprehensive Housing Study, 2019

Household Growth

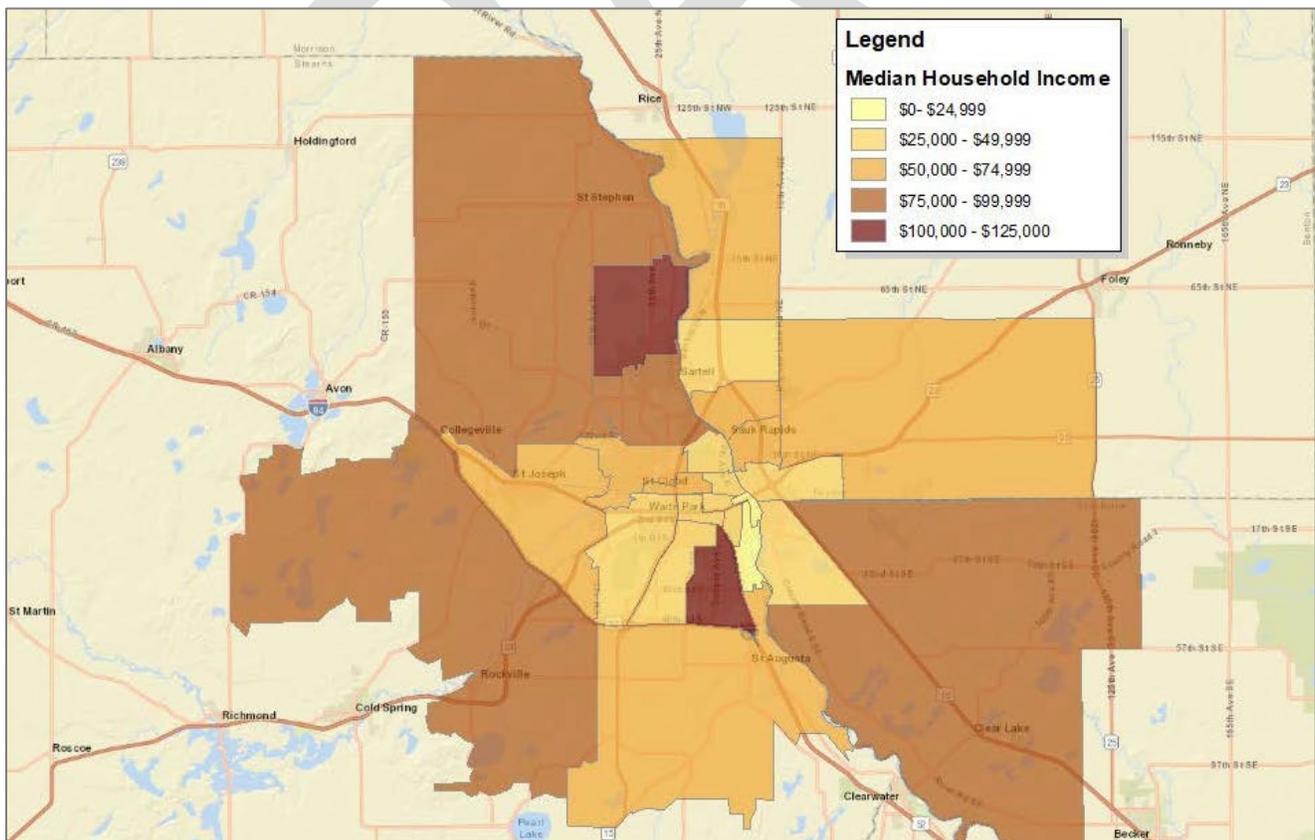
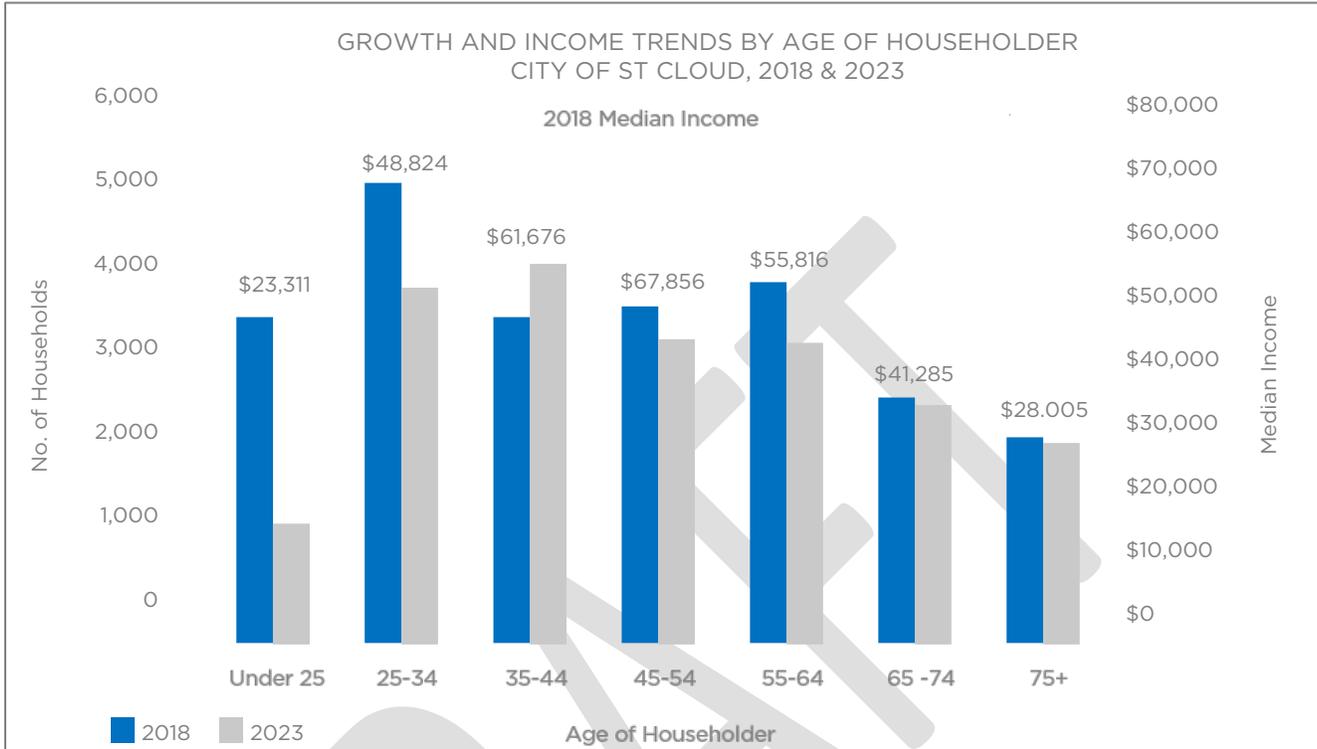
- St Cloud is estimated to have gained 4,477 households between 2000 and 2018 (19.8%), increasing household base to 27,129 households as of 2018. Household growth is projected to increase by 2,494 households (9.0%) between 2020 and 2030 and by 1,958 households (6.5%) by 2040.



Source: St. Cloud Comprehensive Housing Study, 2019

Household Income

- St Cloud city had an estimated median household income of \$45,725 in 2018, which is expected to increase over the next five years to \$51,879 by 2023 (13.5%).
- Areas of the City of St Cloud with high median incomes include the southern and northwestern portions. Areas of the City with lower median incomes include the Downtown and sections directly south of Downtown.

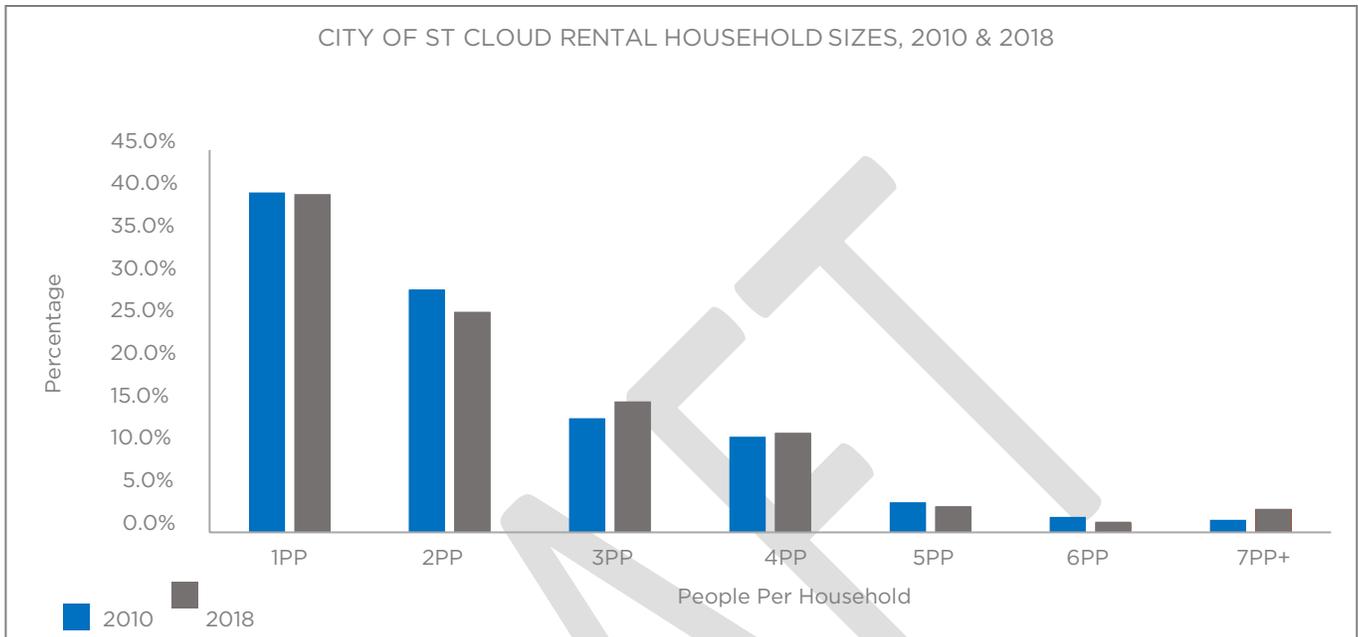


Sources: U.S. Census Bureau; St. Cloud Comprehensive Housing Study, 2019

Household Size

Household size is useful in that it sheds insight into the number of units by unit type that may be most needed in the City. The data illustrates this by showing what households prefer to rent and which households prefer to purchase homes as well as whether they are growing in number.

- Household size for renters tends to be smaller than for owners. In 2018, approximately 40% of renter-occupied households in the City were one-person households.
- One-person households in the city have the highest percentage of renters among all household types. Seven-person plus households have the lowest renter percentage among all household types.



Source: St. Cloud Comprehensive Housing Study, 2019

Household Type

Household type is useful in assessing housing demand since the household composition often dictates the type of housing needed and preferred.

- Between 2010 and 2018, St Cloud city experienced an increase in all household types except for roommate households. Roommate households consist either of unmarried couples living together or unrelated individuals cohabiting a living space. The Other Family category, which includes single parent families and unmarried couples with children, increased the most, 22.9%, between 2010 and 2018.

ST. CLOUD AREA ANALYSIS, 2010 & 2018

Number of Households	Total HH's		Family Households				Non-Family Households					
	2010	2018	Married w/o Child		Married w/ Child		Other *		Living Alone		Roommates	
	2010	2018	2010	2018	2010	2018	2010	2018	2010	2018	2010	2018
St Cloud	25,902	27,129	5,830	6,008	3,743	3,978	3,775	4,639	7,843	8,626	4,248	3,877
Remainder of Primary Market Area (PMA)	20,508	22,881	6,000	6,201	5,040	5,253	2,858	3,514	5,092	5,558	1,727	2,356
Tri-County Area	100,575	109,820	25,260	33,271	25,260	25,828	13,222	15,718	23,444	25,703	8,835	9,300
Percent of Total												
St Cloud	98%	100%	22.5%	22.1%	14.5%	14.7%	14.6%	17.1%	30.3%	31.8%	16.4%	14.3%
Remainder of Primary Market Area (PMA)	101%	100%	29.3%	27.1%	24.6%	23.0%	13.9%	15.4%	24.8%	24.3%	8.4%	10.3%
Tri-County Area	95%	100%	25.1%	30.3%	25.1%	23.5%	13.1%	14.3%	23.3%	23.4%	8.8%	8.5%

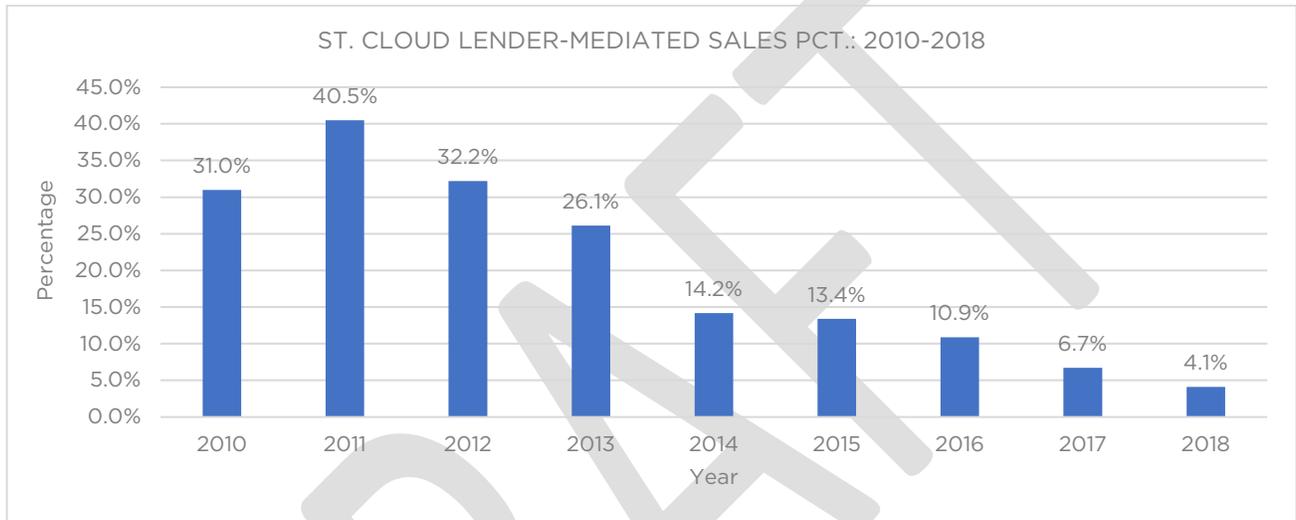
* Single-parent families, unmarried couples with children.

Sources: U.S. Census Bureau; Maxfield Research & Consulting, LLC

Housing Costs

An estimated 58% of renter households can afford the average market rate rent for a one-bedroom at an existing rental property (\$655) in St Cloud. When adjusted for new rental housing however, that proportion falls to 46% of renter households that could afford a new one-bedroom unit priced at \$880 per month. Because of the higher rent structures at the new market rental buildings being constructed, the minimum incomes needed to afford a more available luxury rental are significantly higher than that of the existing rental housing stock in the City. A portion of these renters may be cost burdened, but they choose so for the location and proximity to transit. Additionally, those living in St Cloud will need quality rental products targeting the middle-income market for both general occupancy and senior developments.

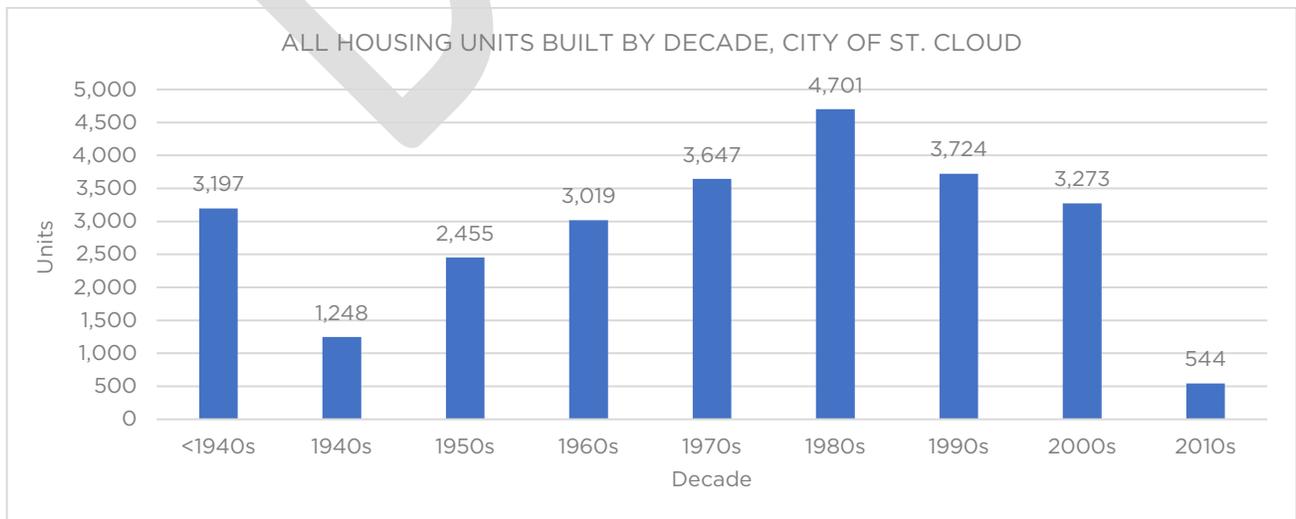
Lender-mediated properties in the City have declined substantially since the housing downturn and Great Recession of last decade. Lender mediated properties (i.e. foreclosures and short sales) accounted for an average of 34.6% of transactions between 2010 and 2012 before declining annually since and comprised only 4.1% of transactions in 2018, which is generally a more normal rate.



Source: 2019 St. Cloud Comprehensive Housing Study

Housing Profile

The median year built for a home in St Cloud city is 1978 and 53% of the housing stock was built prior to 1980. Nearly 40% (38.4%) of the City's housing stock was built in the 1960s or earlier and 12.4% of the housing stock was built prior to the 1940s. As a result, a large percentage of the housing stock in the City may need to utilize remodeling programs that reinvest into the existing housing stock. Programs that encourage homeowners to invest and maintain the housing stock such as weatherization, heating and electrical improvements, and other types of remodeling can assist homeowners with these investments.



Source: 2019 St. Cloud Comprehensive Housing Study

Diversity

- In 2018, “White Alone” comprised the largest proportion of the population in the City (81.8%). This percentage has decreased since 2010 where “White Alone” was 86.1% in St Cloud city.
- Census respondents that identify themselves ethnically as Hispanic or Latino, also identify themselves in various race categories. As of 2018, 2.7% of St Cloud city’s population self- identified as Hispanic/Latino. This compares to 2.0% of the City’s population in 2010.
- “Black or African American Alone” experienced the largest percentage growth between 2010 and 2018 in the City, increasing by 62.3% from 4,625 to 7,507 people.
- The number of renter-occupied housing units in 2017 was highest among all geographies in the “White Alone” category. However, in terms of percentages, renter-occupied housing units were highest among the “Black or African American Alone” category. The percentage of “Black or African American Alone” renter-occupied housing units was 95.2% in the City.
- In the “White Alone” category, of all occupied housing units, 57.5% were owner-occupied in the City. In comparison, of all occupied housing units in the “Black or African American Alone” category, 4.8% were owner-occupied in the City.

Poverty

- In St Cloud, of the 62,454 people for whom poverty status is determined, 14,504 (23.20%) are below the poverty level. This percentage (23.20%) is higher than the percentage of those below the poverty level in both the PMA (12.23%) and the Tri-County Area (11.04%).

CONCENTRATED POVERTY OF ST. CLOUD AREA, 2017

	City of St Cloud	Remainder of Primary Market Area (PMA)	Tri-County Area
Total Population for whom Poverty Status is Determined	62,454	53,029	276,460
Number Below Poverty Level	14,504	6,484	30,512
Percent Below Poverty Level	23.20%	12.23%	11.04%

Sources: 2013-2017 U.S. Census Bureau; American Community Survey; Maxfield Research & Consulting, LLC

Disability Rates

The 2014-2018 ACS estimates for the number of disabled individuals in the City of St. Cloud increased 9.7% from 2014 to 2018. The increasing rates of individuals with a disability creates a significant need for accessible housing to ensure that all citizens are able to move around in their own homes. Reasonable fulfillment of accommodations for disability play a significant role in relations between tenants and landlords, and can represent any number of modifications to the property, including:

- Assigning an accessible parking space for a person with a mobility impairment;
- Permitting a tenant to transfer to a ground-floor unit;
- Adjusting a rent payment schedule to accommodate when an individual receives income assistance;
- Adding a grab bar to a tenant’s bathroom;
- Permitting an applicant to submit a housing application via a different means; and
- Permitting an assistance animal in a “no pets” building for a person who is deaf, blind, has seizures, or has a mental disability.

Section II.

Identification of Barriers to Housing Choice

DRAFT

SECTION II.

Identification of Barriers to Housing Choice

This section presents the findings from the resident and stakeholder community engagement processes related to fair housing choice. The opportunities for engagement are detailed below. The final portion of this section outlines identified impediments concluding with actions steps.

Community Engagement

- Neighborhood engagement through open house formats to listen to community needs regarding housing availability and choice.
- In-depth interviews focused on key groups of stakeholders including home builders and realtors, human rights advocates, multi-family builders and property managers, non-profit stakeholders, shelter and transitional housing experts and community stakeholders - 40 participated.
- The development of Comprehensive Housing Needs Analysis for the City of St. Cloud, Minnesota.
- A comprehensive Community Housing Survey focusing on low-to-moderate income residents including public housing - 207 participated.
- Review and analysis of information collected at Project Connect event held October 2019 as it pertains to housing choice - 411 participated.
- CDBG Strategic Planning Session held to inform and engage service providers, non-profits and community organizations that serve and support low-to-moderate income persons in identifying strategies that address the most pressing and community needs over the next five years - 35 participated.
- Discussion and engagement with several working groups such as the United Way Housing Group and Whitney Senior Center Advisory Board as well data presentations at service organizations and housing professional networks such as the Central Minnesota Builders Association.
- A public comment period including wide distribution of draft materials and two public hearings.

Perspectives from Residents and Stakeholders

Housing Choice

- From the perspective of renters, it is difficult to secure housing for persons with public assistance (vouchers), a criminal record, or poor credit.
- Concern was expressed about the size and location of housing suitable for persons with disabilities.
- Senior residents revealed a lack of affordable housing options as well affordable memory care housing options.
- Long waiting lists for public housing prevents residents from attaining affordable housing and limits those wanting to move to more suitable location and apartment size.
- A major obstacle in finding affordable housing is poor rental history (evictions, felonies, poor credit) on top of so few affordable rental options to begin with.
- Advocates for St. Cloud Somali residents consider a lack of Islamic lending products in the local financial marketplace a significant barrier to homeownership for this mostly Muslim population.

Housing Affordability

- Among refugees and immigrants who typically do not begin their new lives with significant retained wealth or assets it can be difficult to secure the number of bedrooms needed affordably.
- There are not enough market rate rental units for lower-income households (30% of area median incomes and below).
- There should be housing programs for persons experiencing short-term housing instability i.e. medical issue, loss of job.

Housing Demand

- There is a need for more intensive support services such as meals, housekeeping and personal care at assisted senior living facilities for older, frailer seniors.
- Need of mixed income housing - some income-based and some not.

Special Needs Housing

- Homeless shelters are full, in need of capital repairs and there is not enough room for families and youth.
- Need more case management and supportive services in homeless shelters to stabilize clients.
- Chronic health conditions, abuse and violence, lack of living wage jobs and housing discrimination are barriers to securing housing for persons experiencing homelessness.
- Need more transitional housing for convicted felons, those with chemical or substance abuse issues, and/or mental health issues.
- There needs to be more permanent affordable housing with on-going case management and supportive services including persons with severe mental illness.
- Housing needed to meet the specific needs of women with families coming from homelessness or domestic violence including and beyond transitional housing to allow future self-sufficiency.

Summary of Public Input

2019 St. Cloud Comprehensive Housing Study Stakeholder Focus Groups

Six focus groups were held at St Cloud City Hall over two days; November 7 and November 19, 2018. The focus groups consisted of the following stakeholders: city staff, non-profit social service providers, multifamily developers, Realtors/homebuilders, community stakeholders, shelter and transitional housing professionals and human rights office and commission members. Participants were each provided a Discussion Guide for their session prior to the meeting. The discussion however, was not limited to listed questions. This section summarizes topics discussed and input provided by focus group participants. For full summary of discussion, see the St. Cloud Comprehensive Housing Study - Appendix. Overall, comments centered about the following themes:

- Increasing Barriers to Securing Stable and Affordable Housing
- Obstacles and Challenges for Persons Experiencing Homelessness
- Public Housing Needs and Use of Housing Vouchers
- Mental Health Resources and Services
- Demand for Housing Types
- Affordable Housing Costs
- Shelter and Transitional Housing Needs
- Zoning and Mixed-Use Developments
- Market Desirability and Challenges
- Community Partnerships and Opportunities
- Importance of Access to Healthcare
- Barriers to Securing Affordable Housing
- Workforce and Need within Local Economy
- Human Rights Commission
- Minnesota Discrimination Laws

St. Cloud HRA Public Housing Data

Public housing was established to provide decent and safe rental housing for eligible low-income families, the elderly and persons with disabilities. Public housing comes in all sizes and types, from scattered single-family houses to high rise apartments for elderly families. The St. Cloud Housing and Redevelopment Authority (HRA) manages 291 units of public housing and offers programs to help homeowners preserve homes through deferred loans in the City of St. Cloud. In addition to subsidized apartments, “tenant-based” subsidies in form of vouchers help lower income households afford market rate rental housing. The St. Cloud HRA manages 950 Housing Choice rental assistance vouchers of which 912 are currently in use. In addition, there are 75 HUD VASH vouchers dedicated to Veterans and maintains a 92% utilization rate. As of January 10, 2020 - there are 694 households on the Housing Choice rental assistance wait list (the wait list is currently closed):

- 33 households who are elderly (62 or older)
- 153 households that have a disability
- 508 households that is neither elderly nor disabled
- 385 households that need a 1 bedroom
- 85 households that need a 2 bedroom
- 134 households that need a 3 bedroom
- 59 households that need a 4 bedroom
- 31 households that need a 5 bedroom

2018 St. Cloud Housing Survey

A total of 1,350 paper surveys were distributed to public housing residents by the St. Cloud HRA. The following community partners also helped distribute to clients and in their service areas: Place of Hope, Tri-CAP, Central Minnesota Housing Partnership, Catholic Charities, St. Cloud Regional Library, and Pathways 4

Youth. In addition, the survey was available online with the link made widely available to community partners for distribution. There were 217 responses collected in total between paper and online forms. A fairly large number of renters (71%) completed the survey. Regardless of whether they themselves experienced a discriminatory act or not, 71% of total respondents believed that housing discrimination was a problem in St. Cloud. Most respondents felt that discrimination in access to housing was based on race (54%) with disability coming in second at 45%. Survey respondents felt that most often housing discrimination exists in the form of property management (59%). Among those who noted experiencing discrimination, an overwhelming majority reported that they did not report the incident (69%). It also worth noting that overall, the top housing needs were listed as (1) Affordable Housing - Rent and Own; (2) Emergency Shelter & Supportive Services for Those Experiencing Homelessness; and (3) Supportive Services for Persons with Severe Mental Illness.

Project Connect Survey

A total of 411 persons attended Tri-CAP's annual Project Event held on October 15th, 2019 at the River's Edge Convention Center. 74% of attendees responded that they had never been to a Project Connect event in the past. 139 persons reported being stably housed with 116 who are homeless and 62 at-risk of homelessness. That equals to 56% of participants were homeless or at-risk of homelessness. Of the 30+ services offered at the event, most were seeking clothing, housing assistance/counseling and employment/jobs. The other two immediate, on-site services sought were food resources and a haircut.

St. Cloud CDBG Strategic Planning Session

A Strategic Planning Session was held at the River's Edge Convention Center on November 19, 2019 to develop five-year goals, needs and activities. Representatives from the following organizations attended: Human Rights Commission, LSS St. Cloud Crisis Nursery, Stearns County, Catholic Charities, The Salvation Army, St. Cloud HRA, Central Minnesota Council on Aging, Boys and Girls Club of Central Minnesota, Tri-CAP, Pathways 4 Youth, St. Cloud Metro Commission, United Way of Central Minnesota, Lumber One, Central MN Habitat for Humanity, Higher Ground Church, CentraCare Health, Lutheran Social Services, City of St. Cloud, Homeless Helping Homeless, Anna Marie's Alliance, Premier Real Estate, St. Cloud Downtown Council and Promise Neighborhood. The goal of the session was four-part: (1) education/awareness, (2) information sharing, (3) brainstorming and (4) alignment/prioritization of five-year CDBG Consolidated Plan goals. After an overview of the CDBG program and presentation on local data, participants engaged in the task of listing local needs and potential activities then narrowing a long list of needs to five-year priorities. A post Strategic Planning Session survey was sent to participants to prioritize their updated community needs and provide further comment. In the end, the top priority of community stakeholders was public services (homelessness, supportive services, and mental health) with affordable housing in second. The third priority was fair housing (buying, selling, renting or financing). The overall theme heard from participants was though difficult to prioritize given all the needs of community, the highest need going forward should be to invest in people, opportunity and better access to jobs and housing.

Section III.

Fair Housing Goals and Action Steps

DRAFT

SECTION 3.

Fair Housing Goals and Action Steps

Goal A – Increase Supply of Affordable Housing.

1. Provide assistance to preserve existing affordable housing and to create new affordable housing.
2. Assure the availability of adequate sites for the development of affordable housing.
3. Develop strategies to mitigate or preserve affordable multi-family units at risk of conversion to market rate units.

Goal B – Expand Access to Housing for Persons with Disabilities and/or In Need of Special Services.

1. Provide assistance and resources to make accessibility improvements to affordable housing.
2. Support local advocate agencies and service providers to provide resources to transition persons to independent living settings.

Goal C – Improve Awareness and Utilization of Fair Housing Resources.

1. Support efforts to educate persons, including occupants, owners, and agents of both rental and purchase units regarding their fair housing rights and responsibilities.
2. Support local advocate agencies and community stakeholders in efforts to disseminate fair housing information to the community at large.

DRAFT