



DRAFT ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FAIR HOUSING PLAN



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ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

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INTRODUCTION

Orlando, “The City Beautiful” is one of the nation’s most attractive tourist destinations, and an important magnet for corporate relocations. The city's growth and prosperity are due, in no small part, to its quality of life, warm weather, and amazing amenities. The city’s population is expected to increase to 468,069 by 2050, a 46.37% increase from the 2022 population of 319,793 (City of Orlando, 2022).

Orlando’s history dates back to 1838 when the U.S. Army built Fort Gatlin south of present-day city limits during the Seminole Wars. By 1840, a small community had grown around the fort known as Jernigan, named after the Jernigan family who had established the first permanent settlement in the area. The community officially changed its name to Orlando six years later and the U.S. Post Office adopted the name change in 1857. The Town of Orlando was incorporated in 1875 with 85 inhabitants, including 22 qualified voters (Orlando History).

Orlando experienced incredible growth between its humble start as swamp land in what was then Mosquito County and the opening of Walt Disney World just south of Orlando in 1971 – from the pineapple farms and water parks in the College Park/Lake Ivanhoe area to the historic Tinker Field that hosted baseball legends such as Jackie Robinson, Hank Aaron, and Joe DiMaggio (Orange County Regional History Center, 2020). Orlando has grown into a multicultural city in part due to diverse migration patterns that followed significant historical events that defined not only Orlando but the entire country.

According to the City of Orlando’s Downtown Development Board and Community Redevelopment Agency, Orlando was still in its infancy when Jonestown, a 12-block Black community was founded during 1880, near the banks of Fern Creek and Greenwood Cemetery. During the 1930s to 1950s, Parramore was the economic hub for African Americans in Central Florida. During the Jim Crow era, segregation did not allow African Americans to live in the city’s predominantly white neighborhoods. According to the Orange County Regional History Center, Orlando, like most cities of the time, began segregating families with zoning policies around the 1920’s. Many efforts have been made since then to address and continue to address the discrimination seen during this time.

As Florida’s fruit harvesting industries were starting to thrive, there was an increase in Caribbean migration to help with fruit harvesting (Lorenzi and Batalova, 2022). After the 1959 Cuban Revolution, 1.4 million people fled to the United States with the majority of those refugees settling in Florida and New Jersey (The Cuban Experience in Florida: Revolution and Exodus). Orlando has the largest and fastest growing Puerto Rican population in Florida with a cultural impact similar to that of Cuban Americans in South Florida. The Hispanic population of the city has grown dramatically in the last few decades from just 4% in 1980 to 25% in 2010 (2024 World Population Review). Over the years migration from the Caribbean has continued. According to the Urban Institute, thousands of people from Puerto Rico came to Florida after being displaced following Hurricane Maria. As climate change continues to impact island and coastal cities, there

is an expectation this growth will continue. Other Caribbean and West Indian nationalities in Central Florida include a large and growing Haitian community, Tobagonians, Trinidadians, Dominican Republic, and Jamaicans (2024 World Population Review).

Asian Immigration into Florida began after the Civil War. According to the Orange County Regional History Center, after the Vietnam War, there was Vietnamese migration into the City of Orlando, primarily settling in the area that is now the Mills 50 Main Street District. The area was originally nicknamed Little Saigon. Although originally Vietnamese in character, other groups have migrated to Orlando, bringing traditions like the annual Chinese New Year Parade.

Orlando continues to diversify and grow into a rich blend of cultures and heritages. The City of Orlando has continually demonstrated its commitment to fair housing for all residents. In 1973 an ordinance was adopted creating Chapter 57 – Discrimination. Section 57.02 established the Chapter 57 Review Board, which among its functions, are to foster mutual understanding and respect among all racial, religious, age, disability and ethnic groups in the city. The City of Orlando Office of Human Relations oversees Chapter 57 and is a certified agent for both the U.S. Department of Housing and Urban Development (HUD) and the U.S. Equal Employment Opportunity Commission (EEOC).

Orlando is a diverse, welcoming, multicultural community that is committed to the equality of its residents. Inclusion and compassion are important to our way of life. We are also committed to ensuring that every person, regardless of economic status, has access to quality housing that is safe and affordable. The Analysis of Impediments to Fair Housing Choice (Fair Housing Plan) identifies fair housing issues facing our community and recommends actions the city can take to eliminate housing discrimination and promote fair housing choices for everyone.

Citations:

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I. EXECUTIVE SUMMARY

Title VIII of the Civil Rights Act of 1968, the Fair Housing Act, and the Fair Housing Amendments Act of 1988 (42 U.S. Code §§3601-3619, 3631) are federal fair housing laws that prohibit discrimination in housing on the basis of race, color, national origin, religion, sex, familial status, and disability. The Fair Housing Act covers most types of housing including rental housing, home sales, mortgage and home improvement lending, and land use and zoning. Excluded from the Act are owner-occupied buildings with no more than four units, single family housing sold or rented without the use of a real estate agent or broker, and housing operated by organizations and private clubs that limit occupancy to members. The Housing for Older Persons Act, created in 1995, exempts senior housing from familial status discrimination.

HUD has a statutory obligation under Section 109 of the Housing and Community Development Act (HCD) Act of 1974, Title I, prohibiting discrimination on the basis of race, color, national origin, disability, age, religion, and sex within Housing and Community Development programs or activities. The City of Orlando receives federal funding from HUD to conduct housing and community development activities under 24 CFR Part 91, the Consolidated Planning process. As a requirement for receiving these entitlement funds, the city is required to submit a certification to HUD to Affirmatively Furthering Fair Housing (AFFH). This certification requires undertaking a fair housing analysis to assess fair housing impediments. HUD has issued guidelines and regulations to assist jurisdictions with the preparation of the Analysis of Impediments (AI) to Fair Housing Choice (Fair Housing Plan). In 2015, HUD published the Affirmatively Fair Housing Rule, however this rule was rescinded during 2020. In 2021c, HUD issued an Interim Final Rule (IFR) related to the AFFH certification titled "Restoring Affirmatively Furthering Fair Housing Definitions and Certifications". The IFR will remain in effect until the proposed rule published February 9, 2023, becomes final.

Once the Fair Housing Plan is completed, HUD requires the city to take appropriate actions to overcome the effects of any impediments identified in the analysis and maintain records reflecting the actions taken. The document presented here provides an analysis of current fair housing impediments and the actions to be undertaken to overcome the effects of the identified impediments.

Summary of Findings

The key findings of the plan are as follows:

- The Fair Housing Plan completed for the City of Orlando shows that the city has experienced a 29% growth in population since 2010. Orlando's population, based on the U.S. Census 2017-2021 5-Year American Community Survey (ACS), is 302,968.
- The city is racially and ethnically diverse, with 53.4% White, 23.5% Black/African American, 4% Asian, and 19% other race/two or more races. Hispanic residents (of any race) account for 34.2% of the population.

- The percentage of families and people whose income in the past 12 months is below the poverty level is 12.9% for all families; however, for families with a female householder and no spouse the percentage is 24.1%.
- Of the population 16 years and over, 71.8% are in the labor force.
- Of the total housing units in the city, 83.6% are occupied, with 38.2% owner-occupied and 61.8% renter occupied.
- About 35% of housing units were built prior to 1980. Less than 1% of occupied housing units lack complete plumbing or complete kitchen facilities.
- Using HUD's Comprehensive Housing Affordability Strategy (CHAS) data for the Five-Year Consolidated Plan, of the households in the 0-80% AMI, 94.7% experience severe cost burden; 96.7% renter households in the 0-80% AMI, experience severe cost burden; and 86.5% owner households in the 0-80% AMI, experience severe cost burden.
- Based on HUD's AFFH Data the following is surmised. Detailed information is provided in Section V, Subsection D, Part 3.
 - There are two identified areas that meet the definition of Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) where poverty rates exceed 40% and the non-White population is 50% or more. (Lake Mann Area, and Parramore Area).
 - Orlando has a high segregation index for Black and White residents when compared to the region as a whole.
 - In Orlando, Black, Hispanic, and Other Non-Hispanic households experience housing problems and severe housing problems at a higher rate than other race/ethnicity categories within the city, and when compared to the region.
 - The highest rate of households experiencing housing problems are those with five or more members.
 - Concerning Disparities in Access to Opportunities, the following opportunity dimensions were measured:
 - Low Poverty Index: The residents of Orlando experience more exposure to poverty when compared to the region, with Black, Native American, and Hispanic populations having the highest exposure.
 - School Proficiency Index: The City of Orlando shows a lower quality of school system when compared to the region. Within the city, White, and Asian/Pacific Islander populations have the highest level of access to proficient schools, while Black, and Hispanic populations have the lowest level.
 - Labor Market Engagement Index: The City of Orlando shows a higher labor force participation when compared to the region. White and Asian/Pacific Islander population show a higher labor force participation in the City of Orlando as well as regionally. The Black population has the lowest labor force participation in the city and in the region.
 - The most prevalent disability within the city is ambulatory difficulty.
- Resident Survey Major Findings:
 - The survey generated a total of 610 responses: 463 responses from residents and 147 from organizations.

- Between 308 and 313 respondents chose to answer the demographics questions. The most common responses were as follows:
 - 52.4% of 313 respondents live within city limits.
 - 41.9% of 310 respondents are single and 29.0% are married.
 - 64.2% of 310 respondents fall below an annual income of \$80,000.
 - 61.74% of 311 respondents are not of Hispanic, Latino or Spanish origin.
 - 50.97% of 308 respondents are White and 28.25% are Black/African American.
- 25.1% of respondents reported feeling not knowledgeable of fair housing laws, and only 33.7% reported feeling slightly knowledgeable.
- Each survey presented two randomly selected housing scenarios, followed by question to assess respondents' knowledge of fair housing laws. More than 75% of respondents answered correctly that it is against federal law for landlords to exclude renters based on religion (78%) or sexual orientation (76%), or for realtors to discriminate based on race (82%). Although still a majority, a lower percentage of respondents are aware that it is illegal for lenders to request higher down payments from applicants based on their ethnicity (68%). Less than 50% of respondents know it is illegal for a landlord to deny a rental applicant because of their disability (47%); and treat families with children differently from households without children (40%).
- About 18% of respondents have experienced housing discrimination in the city, and about 21% know of someone that has experienced housing discrimination in the city. The organization most frequently cited as the one doing the discrimination were rental property managers/owners followed by condominium or homeowner associations, and real estate professionals.
- 24% of respondents cited race as the reason for their discrimination, followed by color (14%); and 27% cited race as the reason for the discrimination of the person they know, followed by color (18%) and sexual orientation (14%).
- About 83% of respondents did not seek help for the discrimination – they provided various reasons but most answered that they did not know where to go for help or felt that nothing would be done.
- 49.4% of respondents strongly agree, and 25.3% somewhat agree that affordable housing choices are limited to certain areas or neighborhoods in the city.
- 64% of respondents strongly disagree that there is an adequate supply of affordable housing in the city while only 36.1% strongly disagree that there is an adequate supply of housing in the city accessible to people with disabilities.
- The top three issues respondents identified as restricting the selection of housing in Orlando are: the cost of rent/mortgage in a preferred neighborhood, poor credit history or low credit score; and crime in the area.
- By far the biggest issue among the housing restrictions is affordability with 76% of respondents ranking it as significantly.

- Organization Survey Major Findings
 - A total of 147 responses were received from organizations or businesses that provide housing-related programs and or services; the most responses received were from government agencies.
 - Approximately 50% respondents indicated that fair housing plays a primary role in their organization's mission and 15% said it plays an exclusive role.
 - About 52% of respondents are located in a minority and/or low-income neighborhood, and 66% provide information and marketing materials in languages other than English.
 - Of the 96 respondents, only 39.6% believe that fair housing laws, programs and enforcement mechanisms are extremely effective and very effective.
 - About 65% of respondents agree that affordable housing choices in Orlando are limited to certain areas or neighborhood in the city.
 - 66% of respondents strongly disagree that there is an adequate supply of affordable housing in the city while only 28% strongly disagree that there is an adequate supply of housing in the city accessible to people with disabilities.
 - Inadequate availability of affordable housing was listed as the major factor (82%) affecting the segregation of residents of protected classes limiting access to community assets. It was followed by insufficient income, the concentration of affordable housing within certain areas in the City of Orlando, poor credit history, excessive rental requirements, and inadequate access to public transportation or employment opportunities.
- Review of the Home Mortgage Disclosure Act (HMDA) public loan data for census tracts (CT) comprising the City of Orlando revealed the following:
 - The denial rate for the City of Orlando was established to be at 12% for 2021 data.
 - Fifteen CTs have a Minority Denial rate higher than 12%; 12 of those CTs have minority applications exceeding 50% of the total applications. Although definite identification of discriminatory lending practices cannot be ascertained by correlation of HMDA data element, analysis of the data provides discernible patterns that may suggest discriminatory lending practices based on minority status.
- Based on the review of legal cases regarding fair housing violation in the Orlando area, the Department of Justice listed two cases for the area: During 2021-22 a consent order resolving a fair housing claim was entered against the defendants to compensate the plaintiffs, Hispanic homeowners seeking mortgage modification services. During 2022-23 a consent order was entered against a developer and property manager for discriminating against families with children. The consent order still must be approved by the U.S. District Court for the Middle District of Florida.

Section IV describes the community participation process undertaken to update the Fair Housing Plan.

For each fair housing issue identified in the Plan, goals have been suggested in Section VI. The Fair Housing goals for the city are grouped into these major components:

- Increase affordable housing opportunities.
- Maintain or preserve affordable housing units.
- Support increasing the number of accessible housing units for people with disabilities.
- Provide housing resources and increase homeownership opportunities for low-income residents and increase homeownership opportunities.
- Increase fair housing educational opportunities for organizations.
- Support fair housing education and outreach to all residents.

II. FAIR HOUSING BACKGROUND

Title VIII of the Civil Rights Act of 1968, the Fair Housing Act, and the Fair Housing Amendments Act of 1988 (42 U.S. Code §§3601-3619, 3631) are federal fair housing laws that prohibit discrimination in housing on the basis of race, color, national origin, religion, sex, familial status, and disability. The Fair Housing Act covers most types of housing including rental housing, home sales, mortgage and home improvement lending, and land use and zoning. Excluded from the Act are owner-occupied buildings with no more than four units, single family housing sold or rented without the use of a real estate agent or broker, and housing operated by organizations and private clubs that limit occupancy to members. The Housing for Older Persons Act, created in 1995, exempts senior housing from familial status discrimination.

The City of Orlando Office of Human Relations administers and enforces the federal Fair Housing Act and Chapter 57 of Orlando City Code, which added marital status, sexual orientation, and gender identity/expression to the list of protected classes. The Office of Human Relations is a certified agent of both the U. S. Equal Employment Opportunity Commission (EEOC) and the U.S. Department of Housing and Urban Development (HUD).

HUD has a statutory obligation under Section 109 of the HCD Act of 1974, Title I, prohibiting discrimination on the basis of race, color, national origin, disability, age, religion, and sex within Housing and Community Development programs or activities. The City of Orlando receives federal funding from HUD to conduct housing and community development activities under 24 CFR Part 91, the Consolidated Planning process. The Consolidated Planning process combines major federal grants such as the Community Development Block Grant (CDBG), the HOME Investment Partnerships Program (HOME), Emergency Solutions Grant (ESG), and the Housing Opportunities for Persons with AIDS Grant (HOPWA).

As a requirement for receiving these entitlement funds, the city is required to submit a certification to HUD to Affirmatively Further Fair Housing (AFFH). This certification requires undertaking a fair housing analysis to assess fair housing impediments. HUD has issued guidelines and regulations to assist jurisdiction with the preparation of the Analysis of Impediments (AI) to Fair Housing Choice (Fair Housing Plan).

Once the Fair Housing Plan is completed, the jurisdiction should take appropriate actions to overcome the effects of any impediments identified in the analysis and maintain records reflecting the actions taken. The document presented here provides an analysis of current fair housing impediments and the actions to be undertaken to overcome the effects of the identified impediments.

The Housing and Community Development Department is the designated entity responsible for submitting the city's Consolidated Plan and Fair Housing Plan to HUD. Our mission is to maintain sustainable, viable, and safe communities for extremely low-, low- and moderate- income persons. The city's Fair Housing Plan was last updated in September 2016.

III. COMMUNITY AND HOUSING PROFILE

The U.S. Census is produced every 10 years and provides the official population count as well as other basic information. The Census American Community Survey (ACS) is an ongoing survey that provides vital information on a yearly basis about the U.S. and its people. According to the Census Bureau, the 5-year estimates from the ACS are “period” estimates that represent data collected over a period of time. The primary advantage of using multiyear estimates is the increased statistical reliability of the data for less populated areas and small population subgroups. The Fair Housing Plan utilizes data from the 2020 Census and data from the 2017-2021 ACS 5-Year Estimates.

A. Population, Race and Ethnicity

The 2020 Census indicated that the city’s population is 307,573, which represents an increase of 69,273 people, or 29% from 2010. Based on the US Census 2017-2021 ACS 5-Year Estimates, the percentage of White residents is 53.4, the percentage of Black/African American residents is 23.5%, and the percentage of Hispanic residents (of any race) is 34.2%.

Total Population and Race Table

	2021 ACS		2020 Census	
	Estimates	Percent (Margin of Error)	Count	Percent
Total population	302,968	(X)	307,573	(X)
White	161,777	53.4% (±1.2)	122,998	40.0%
Black or African American	71,207	23.5% (±1.2)	76,387	24.8%
American Indian/ and Alaska Native	421	0.1% (±0.1)	2,958	1.0%
Asian	12,213	4.0% (±0.5)	15,590	5.1%
Native Hawaiian and Other Pacific Islander	46	0.0% (±0.1)	325	0.1%
Some other race	19,703	6.5% (±0.8)	81,670	26.6%
Two or more races	37,601	12.4% (±1.0)	7,645	2.5%

Source: US Census 2017-2021 ACS 5-Year Estimates

Estimates Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to non-sampling error (for a discussion of non-sampling variability, see ACS Technical Documentation). The effect of non-sampling error is not represented in these tables.

Hispanic Population Table

	2021 ACS		2020 Census
	Estimates	Percent (Margin of Error)	Count
Total population	302,968	(X)	307,753
Hispanic or Latino (of any race)	103,537	34.2% (± 1.3)	101,061
Mexican	5,523	1.8% (± 0.4)	(X)
Puerto Rican	47,778	15.8% (± 1.2)	(X)
Cuban	9,151	3.0% (± 0.5)	(X)
Other Hispanic or Latino	41,085	13.6% (± 1.2)	(X)
Not Hispanic or Latino	199,431	65.8% (± 1.3)	(X)

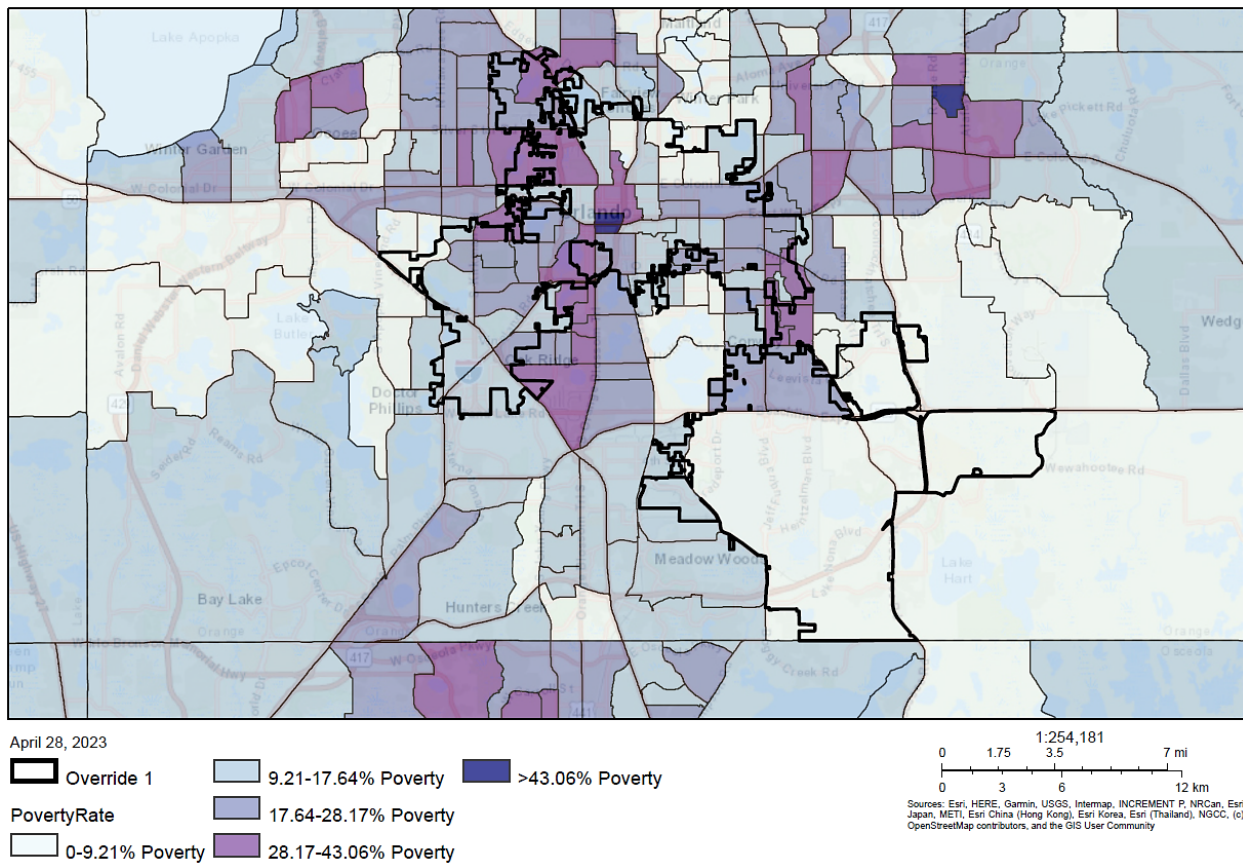
Source: US Census 2017-2021 ACS 5-Year Estimates

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B. Income, Education and Employment

Based on the US Census 2017-2021 ACS 5-Year Estimates, the median household income for the City of Orlando is \$58,968. The median earnings for male full-time, year-round workers is \$50,477, and for females is \$40,710. The percentage of families and people whose income in the past 12 months is below the poverty level is for all families 12.9%; for families with related children of the householder under 18 years is 17.9%; for families with female householder and no spouse is 24.1% and families with female householder, no spouse, with related children of the householder under 18 years is 30.6%.

CPD Maps - Poverty Rate City of Orlando



According to the US Census 2017-2021 ACS 5-Year Estimates, 23.2% of persons 25 years or over had graduated from high school and 40.1% had a bachelor's degree or higher. Of the population 25 years and over 3.2% had less than a ninth-grade education. Out of 118,834 total households, 96.3% had a computer and 89.7% had a broadband internet subscription.

Of the total 245,980 population 16 years and over, 176,617 or 71.8% are in the labor force, and of that total, 175,968 or 71.5% are categorized as in civilian labor force (including employed and unemployed). An estimated 143,283 or 86.3% of the civilian employed population 16 years and over, are private wage and salary workers, 8.4% were government workers, and 5.1% were self-employed.

C. Housing and Household Characteristics

Housing Occupancy/Vacancy Table

	2021 Estimates	Percent	Margin of Error
HOUSING OCCUPANCY			
Total housing units	142,115	(X)	(X)
Occupied housing units	118,834	83.6%	±0.8
Vacant housing units	23,281	16.4%	±0.8
Homeowner vacancy rate	4.3%	(X)	(X)
Rental vacancy rate	9.3%	(X)	(X)

Of the total housing units, 83.6% are occupied. The vacancy rate per the ACS was 16.4%. About 35% of housing units were built prior to 1980. Approximately 38.2% of housing units are owner occupied while approximately 61.8% are renter occupied. Less than 1% of occupied housing units lack complete plumbing or complete kitchen facilities.

According to the 2017-2021 ACS 5 YR Estimate, there are an estimated 118,834 households in the city, of which 35.4% are married-couple households; 22.1% are male householders with no spouse/partner present; 33.2% are female householders with no spouse/partner present; 28.4% are households with one or more people under 18 years; and 20.1% are households with one or more people 65 years and over. The unemployment rate was estimated to be at 5.6%.

D. Housing Affordability

The HCD of 1974, as amended, as well as the Cranston-Gonzalez National Affordable Housing Act (NAHA) require that the City of Orlando certify that it will affirmatively further fair housing in order to receive HUD federal grants. According to HUD, affirmatively furthering fair housing means taking meaningful actions, in addition to combating discrimination, that taken together, reduce or end significant disparities in housing need.

Additionally, NAHA requires local governments that receive HUD federal grants to develop a comprehensive housing affordability strategy to identify their overall needs for affordable and supportive housing for the ensuing five years. The City of Orlando 2021-2025 Consolidated Plan, prepared during 2021, constitutes the five-year strategic plan required by HUD.

The Consolidated Plan identifies the overall needs for affordable and supportive housing in the city. According to HUD, affordability is defined as follows: a rental unit is considered affordable if gross rent (including utilities) is no more than 30 percent of the household income. An owner unit is considered affordable if monthly housing costs (including principal and interest, taxes, and

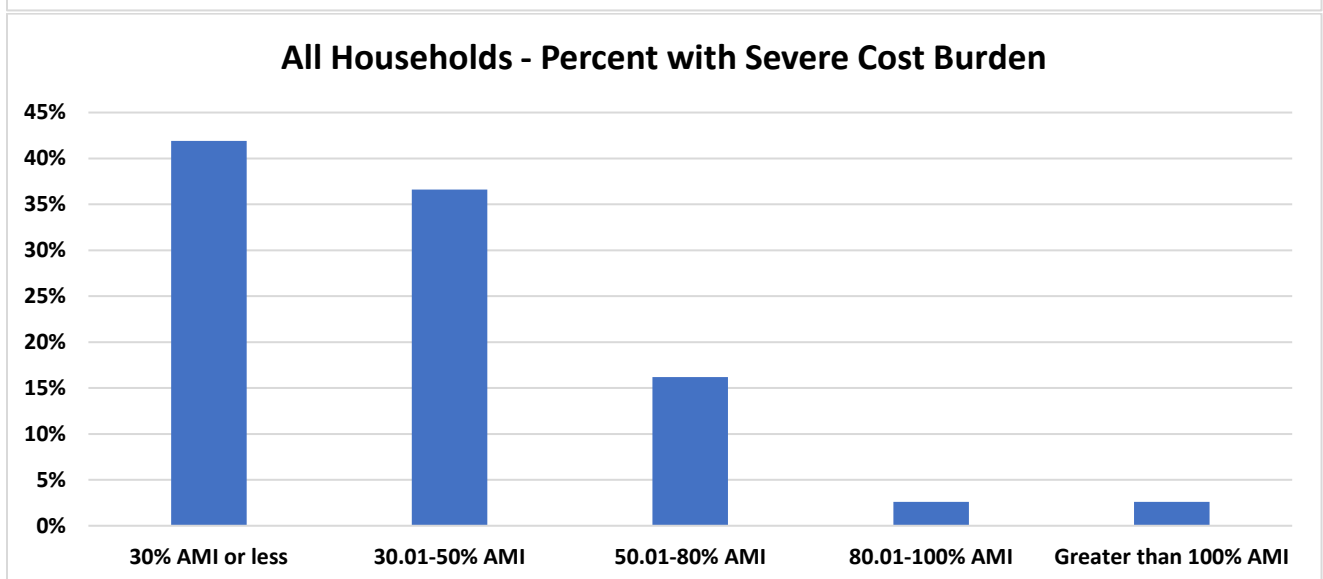
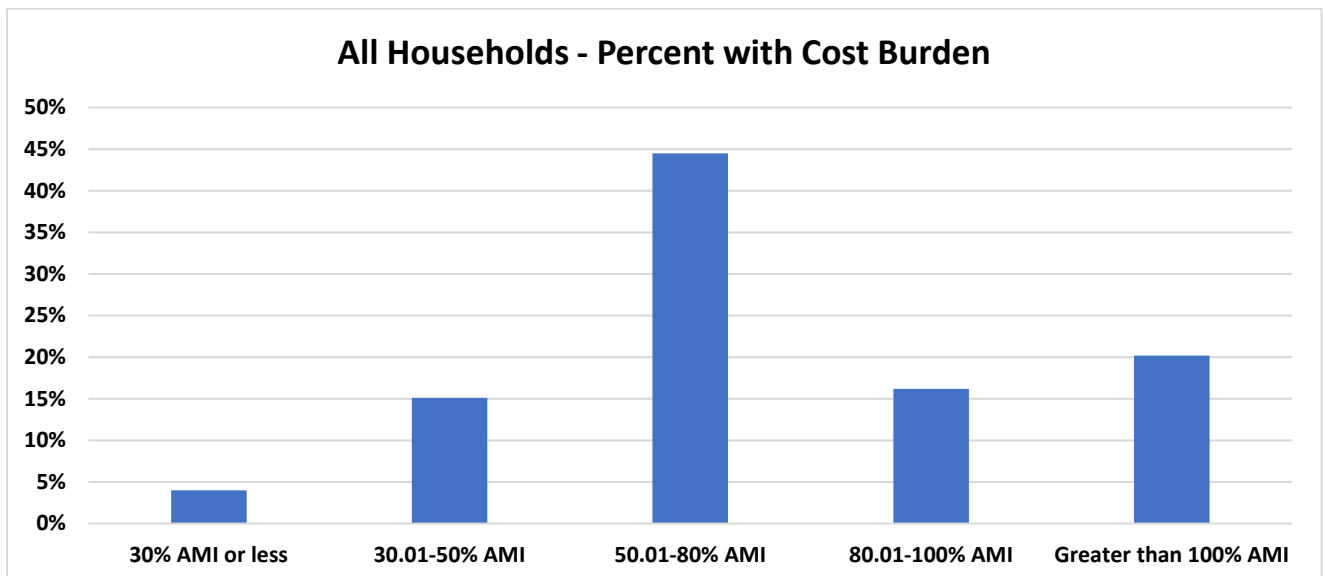
insurance) are no more than 30% of the household income. Based on this definition, the Consolidated Plan identifies cost-burdened and severely cost-burdened households. Cost-burdened households pay between 30 percent and 50 percent of their income on housing related costs. Severely cost-burdened households pay more than 50 percent of their income on housing-related costs.

Cost-burdened and severely cost-burdened households are limited in their selection of housing. Expanding the availability and accessibility of affordable housing will alleviate the presence of cost burden to renter and owner households. Data obtained from the Shimberg Center for Housing Studies shows that in Orlando, the total percentage of households experiencing cost burden is 42.6%. The households in the income categories of less than 30% to 50% Area Median Income (AMI) are the most impacted.

CHAS data from the Consolidated Plan on households with 0-30% AMI revealed that of the total 14,110 households in the 0-30% AMI, 35% are small family (two or four members) households, 19% are households with one or more children 6 years old or younger, 14% contain at least one person 62-74 years of age, 11% contain at least one person age 75 or older, and 4% are large households (five or more members). Additionally, the data revealed that of the households in the 0-30% AMI with one or more housing problems, 40% are Black/African American, 23% are White, and 3% are American Indian/Pacific Islander. Hispanic households represented 32% of that income category. Additionally, the Consolidated Plan shows that 9,640 of renter and owner households in the 0-30% AMI are experiencing severe cost burden. Of those renters and owners living with severe cost burden in the 0-30% AMI, 42% are small related (two to four related members), 34% are other (all other households), 20% are Elderly (a household whose head, spouse, or sole member is a person who is at least 62 years of age), and 5% are large related households (five or more related members). In addition, 445 renter and owner households in the 0-50% AMI are living in severely overcrowded conditions. These households are at the greatest risk of housing instability.

The following tables show the percentage of households, renters and owners, which are experiencing cost burden and severe cost burden by income categories. The tables were prepared using the estimates and projections prepared by the Shimberg Center, which were based on HUD CHAS dataset and population projections by the Bureau of Economic and Business Research of the University of Florida.

All Households, Cost Burden by Income, 2020 Estimates (Summary)					
Housing Cost Burden					
Household Income	30% or less	30.1-50%	% With Cost Burden	More than 50%	% With Severe Cost Burden
30% AMI or less	1178	1009	4.0%	10186	41.9%
30.01-50% AMI	1698	3835	15.1%	8913	36.6%
50.01-80% AMI	5161	11291	44.5%	3948	16.2%
80.01-100% AMI	6242	4115	16.2%	641	2.6%
Greater than 100% AMI	52716	5140	20.2%	641	2.6%
Total	66995	25390	100%	24329	100%



Renter Households, Cost Burden by Income, 2020 Estimates (Summary)					
Housing Cost Burden					
Household Income	30% or less	30.1-50%	% With Cost Burden	More than 50%	% With Severe Cost Burden
30% AMI or less	1047	632	3.2%	8318	42.8%
30.01-50% AMI	792	2929	15.0%	7531	38.7%
50.01-80% AMI	2966	9833	50.3%	2976	15.3%
80.01-100% AMI	4183	3423	17.5%	319	1.6%
Greater than 100% AMI	26745	2743	14.0%	308	1.6%
Total	35733	19560	100%	19452	100%

Owner Households, Cost Burden by Income, 2020 Estimates (Summary)					
Housing Cost Burden					
Household Income	30% or less	30.1-50%	% With Cost Burden	More than 50%	% With Severe Cost Burden
30% AMI or less	131	377	6.5%	1868	38.3%
30.01-50% AMI	906	906	15.5%	1382	28.3%
50.01-80% AMI	2195	1458	25.0%	972	19.9%
80.01-100% AMI	2059	692	11.9%	322	6.6%
Greater than 100% AMI	25971	2397	41.1%	333	6.8%
Total	31262	5830	100%	4877	100%

IV. COMMUNITY PARTICIPATION PROCESS

The City of Orlando conducted a fair housing survey to gather feedback from current residents, members of the community interested in becoming residents, and organizations/businesses that provide housing-related programs and services in the City of Orlando. The purpose of the survey was to garner insight into respondents' knowledge, practices, opinions, and experiences concerning fair housing in the community. The survey was available online on the city's website, in English, Spanish and Haitian Creole, from January 29 to March 1, 2024.

The online version of the survey was hosted on Qualtrics. Print versions of the resident survey were also made available in English at in-person events.

The survey was advertised in English in the Orlando Sentinel newspaper, in Spanish in La Prensa newspaper, and on flyers and posters posted at Orlando City Hall, city neighborhood centers, the Hispanic Office for Local Assistance (HOLA), and the Orlando Public Library. Survey postcards were mailed directly to residential tenants within the city's R/ECAPs. The survey was listed in city and employee newsletters and emailed to multiple email lists including to developers, landlords/property managers, contractors, city-registered mortgage lenders, non-profit organizations, members of the Homeownership Equity Initiative and Affordable Housing Advisory Committee, and residents within public housing managed by the Orlando Housing Authority. The survey was also promoted on the city's social media channels (Linkedin, Nextdoor, Facebook, X and Instagram) and by city staff at several in-person community meetings and events.

A summary of the surveys' responses can be found in Appendices 1 through 2. The analysis of the open-ended questions can be found in Appendix 3. We received 463 responses from residents and 147 responses from organizations/businesses.

HCD organized two public meetings and participated in a community workshop organized by the Office of Human Relations, to provide residents, especially those within the city's RECAPs, the opportunity to provide feedback and to learn more about AFFH. The meetings will be held at Engelwood Neighborhood Center on May 20, 2024, and on May 22, 2024 at Dr. James R. Smith Neighborhood Center. The community workshop was held on April 17, 2024, at the Grand Avenue Neighborhood Center. All meeting locations are ADA accessible and Spanish interpreters were available during the meeting; all other interpreters were made available upon a 3-day request before the meeting.

A draft of the Fair Housing Plan will be made available to the public starting in May with a minimum 30-day comment period. All comments will be reviewed and considered.

A. Planning and Research Methodology

In July of 2021, HUD issued an Interim Final Rule (IFR) related to AFFH titled "Restoring Affirmatively Furthering Fair Housing Definitions and Certifications". This IFR restored certain definitions and AFFH certifications to HUD's regulations implementing the Fair Housing Act's requirement to AFFH. The IFR also created a voluntary fair housing planning process for which HUD provided technical assistance and support to funding recipients engaged in fair housing planning who would like assistance in fulfilling their statutory AFFH obligations.

On February 9, 2023, HUD issued a Notice of Proposed Rule Making (NPRM) entitled "Affirmatively Furthering Fair Housing". The public comment period ended on April 24, 2023.

On their website HUD has stated that the IFR remains in effect during proposed rulemaking. Training provided by HUD during 2023 indicated that their fair housing planning focus was related to the IFR.

The update to the 2016 Analysis of Impediments to Fair Housing Choice was prepared following HUD's guidance.

The methodology used included the review of existing housing and economic conditions in the area, as well as the collection of demographic and employment data. Data from the U.S. Census American Community Survey, lending institutions, existing city plans and ordinances, and HUD's data were also used. In addition to the use of secondary data, surveys and meetings were carried out to gather firsthand data.

B. Resident and Organization Surveys

A summary of the surveys' data is included in the Appendices. The surveys were provided in English, Spanish and Haitian Creole for residents and organizations to complete. The survey generated a total of 610 responses, with 147 organization and 463 responding to the survey. Most of the survey responses (609 responses) were completed using the online survey, while one paper response was submitted. The majority of respondents (94.9%, n=578) completed the survey in English, while 5.1% of the responses were completed in Spanish. There were no responses completed in Haitian Creole. Highlights of the survey findings are summarized below.

To analyze the data, we used the in-built visualization capabilities of the survey software to summarize the results graphically. We then review these visualizations for trends. We opted not to conduct significance testing for our analysis due to a lack of power in most cases and instead report on trends and descriptive statistics.

Resident Survey

The Resident Survey was designed to elicit responses that to a certain extent will measure how much does the general public know about fair housing laws, how many believe they were victims of housing discrimination, or they knew someone who was a victim of housing discrimination,

and if they sought or knew that they could seek assistance. Scenarios were presented to respondents to ascertain if they agree with the action taken in the scenario, and if they believe it is legal under federal law.

Between 308 and 313 respondents chose to answer the demographics questions. The most common responses were as follows:

- 52.4% of 313 respondents live within city limits.
- 41.9% of 310 respondents are single and 29.0% are married.
- 64.2% of 310 respondents fall below an annual income of \$80,000.
- 61.74% of 311 respondents are not of Hispanic, Latino or Spanish origin.
- 50.97% of 308 respondents are White and 28.25% are Black/African American.

Appendix 1 includes more detailed information on the aforementioned information.

Marital Status Table		
Marital Status	Number of Respondents	%
Single	130	41.8%
Married	90	28.6%
Domestic Partnership	21	6.7%
Divorced or separated	44	14.1%
Widowed	9	2.9%
Prefer not to answer	15	4.8%
Other	4	1.3%
Total	313	100.0%

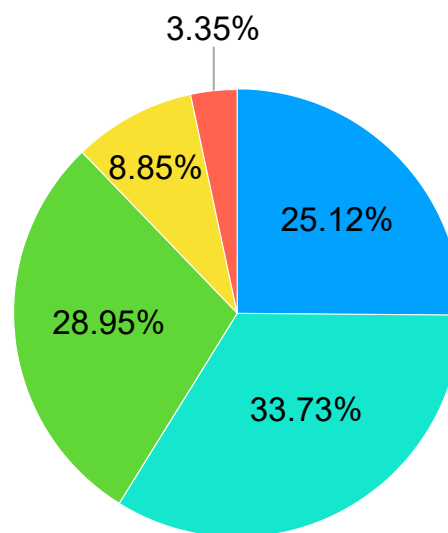
Household Income Characteristics Table		
Income Range	Number of Respondents	%
Less than \$19,999	61	19.7%
\$20,000 - \$39,999	50	16.2%
\$40,000 - \$59,999	48	15.5%
\$60,000 - \$79,999	40	12.9%
\$80,000 - \$99,999	16	5.2%
\$100,000 or more	60	19.4%
Prefer not to answer	35	11.3%
Total	310	100.0%

When asked about their knowledge of fair housing laws, of the 418 respondents, 33.7% indicated being slightly knowledgeable of fair housing laws, and 28.9% being moderately knowledgeable. Overall income did not seem to make a significant difference on the respondents' knowledge of fair housing laws, see results in Appendix 1, Housing Knowledge by Income Levels Table.

KNOWLEDGE OF FAIR HOUSING LAWS		
Knowledge of Fair Housing Laws	Number of Respondents	Percentage
Not Knowledgeable	105	25.1%
Slightly Knowledgeable	141	33.7%
Moderately Knowledgeable	121	28.9%
Very Knowledgeable	37	8.9%
Extremely Knowledgeable	14	3.3%
Total	418	100.0%

How knowledgeable are you about fair housing laws?

- Not knowledgeable at all
- Slightly Knowledgeable
- Moderately Knowledgeable
- Very Knowledgeable
- Extremely Knowledgeable



The resident survey included a total of six different scenarios describing actions taken or to be taken by landlords, lenders, and real estate agents, that violate fair housing laws. Each respondent received two scenarios at random. The scenarios elicited an opinion from the participants concerning a discriminatory housing situation. Respondents were asked first their opinion on the action taken or to be taken, and second if under federal law it is legal to take the described action.

To reduce the overall length of the survey, respondents were only shown two out of the six scenarios. The randomization of the scenarios was handled by the survey software, and the order of the two scenarios was also presented randomly. Each scenario was seen by 159 respondents. Print versions of the survey also only included two scenarios. We randomized these scenarios by creating multiple versions of the print survey. We did not control for ordering effects of scenarios, but given the overall low number of print responses, this likely did not have a great effect on our results.

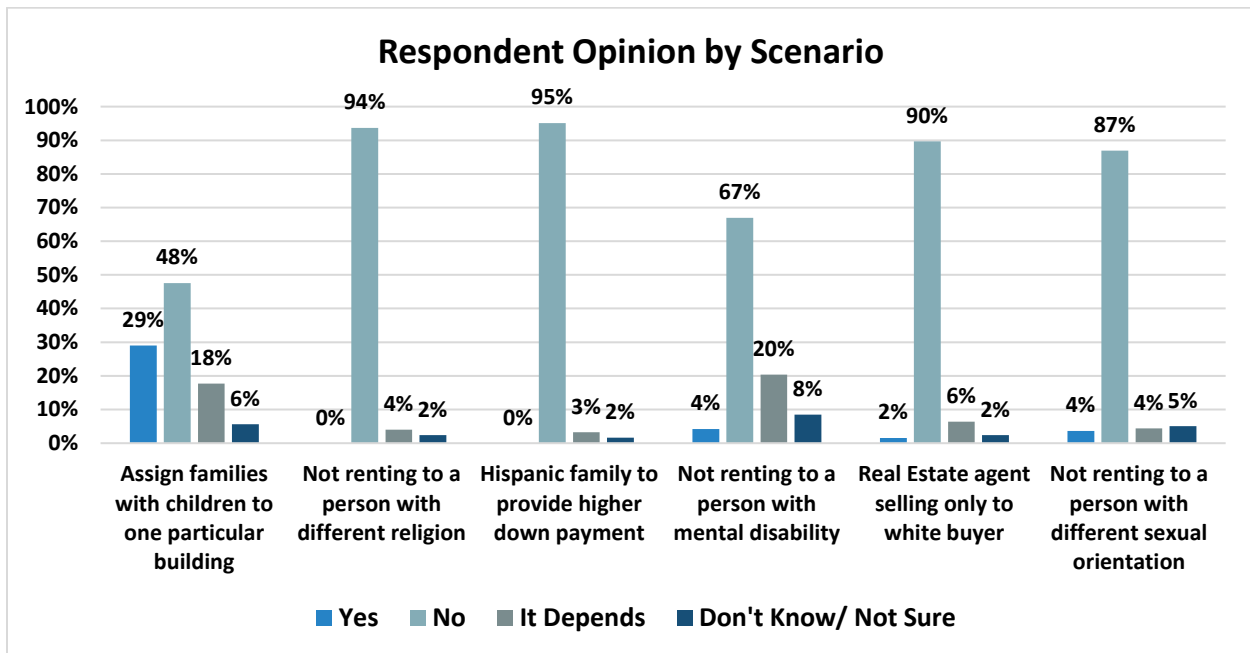
A total of 389 participants responded to the first question on the scenarios, and a total of 388 participants responded to the second question concerning the law. Please see below a table

summarizing the scenario and providing a full wording of the scenario question. This is followed by the opinion responses per scenario, and responses considering what the federal law says.

Scenarios Involving Fair Housing Law:

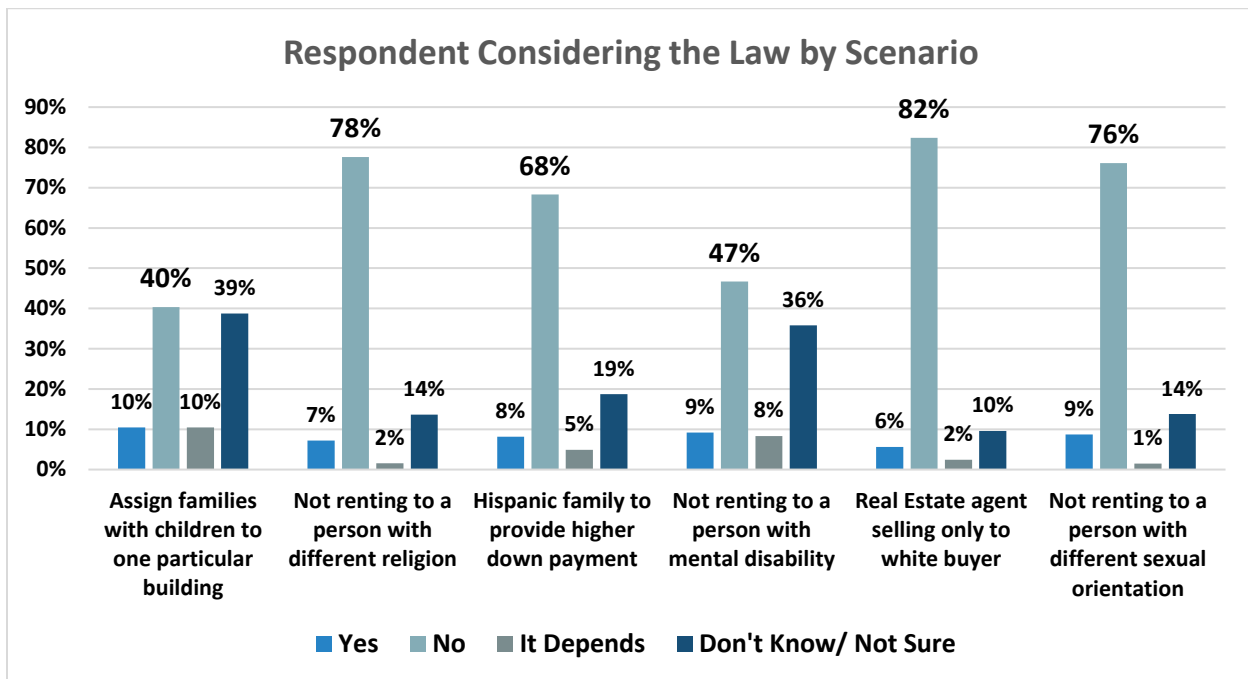
Summary Wording for Scenario	Question Wording for Scenario
Assign families with children to one particular building	An apartment building owner who rents to people of all age groups decides that families with younger children can only rent in one particular building, and not in others, because the building owner thinks young children tend to make lots of noise and may bother other tenants.
Not renting to a person with different religion	An apartment building owner learns that an applicant for a vacant apartment has a different religion than all other tenants in the building. Believing the other tenants would object, the owner does not want to rent to such a person.
Hispanic family to provide higher down payment	A Hispanic family goes to a bank to apply for a home mortgage. The family qualifies for a mortgage but, in the loan officer's opinion, Hispanic borrowers have been less likely than others to repay their loans. For that reason, the loan officer requires that the family make a higher down payment than would be required of other borrowers before agreeing to give the mortgage.
Not renting to a person with mental disability	In checking references on an application for a vacant apartment, an apartment building owner learns that the applicant has a history of mental illness. Although the applicant is not a danger to anyone, the owner does not want to rent to such a person.
Real Estate Agent selling only to white buyer	This question involves a family selling their house through a real estate agent. They are white and have only white neighbors. Some of the neighbors tell the family that, if a non-white person buys the house there would be trouble for that buyer. As a result, the family tells the real estate agent they will sell their house only to a white buyer.
Not renting to a person with a different sexual orientation	An apartment building owner places a notice on a community bulletin board to find a tenant for a vacant apartment. The notice says, "heterosexuals preferred".

What residents think is ok in different scenarios "Regardless of what the law says...."									
Summary of Scenario	Yes	%	No	%	It depends	%	Don't Know/ Not sure	%	Total
Assign families with children to one particular building	36	29%	59	48%	22	18%	7	6%	124
Not renting to a person with different religion	0	0%	118	94%	5	4%	3	2%	126
Hispanic family to provide higher down payment	0	0%	117	95%	4	3%	2	2%	123
Not renting to a person with mental disability	5	4%	79	67%	24	20%	10	8%	118
Real Estate agent selling only to white buyer	2	2%	113	90%	8	6%	3	2%	126
Not renting to a person with different sexual orientation	5	4%	120	87%	6	4%	7	5%	138



More than 87% of the respondents are of the opinion that, regardless of what the law says, landlords should not be able to exclude renters based on their religion (94%) or sexual orientation (87%), lenders should not be able to request higher down payments from applicants based on their ethnicity (95%), and realtors should not be able to exclude buyers based on their race (90%). Although still a majority, less people were aware that is illegal to refuse a rental applicant based on their disability (67%); and even less people were aware that it is illegal to treat families with children differently from households without children (48%).

Respondents Providing Correct Responses by Scenario									
" Under federal law, is it currently legal "									
Summary of Scenario	Yes	%	No	%	It depends	%	Don't Know/ Not sure	%	Total
Assign families with children to one particular building	13	10%	50	40%	13	10%	48	39%	124
Not renting to a person with different religion	9	7%	97	78%	2	2%	17	14%	125
Hispanic family to provide higher down payment	10	8%	84	68%	6	5%	23	19%	123
Not renting to a person with mental disability	11	9%	56	47%	10	8%	43	36%	120
Real Estate agent selling only to white buyer	7	6%	103	82%	3	2%	12	10%	125
Not renting to a person with different sexual orientation	12	9%	105	76%	2	1%	19	14%	138



More than 76% of respondents know that it is against federal law for landlords to exclude renters based on religion (78%) and/or sexual orientation (76%), and for realtors to discriminate based on race (82%). Although still a majority, less people were aware that it is illegal for lenders to request higher down payments from applicants based on their ethnicity (68%), not rent to a person because of his disability (47%); and even less people were aware that it is illegal to treat families with children differently from households without children (40%).

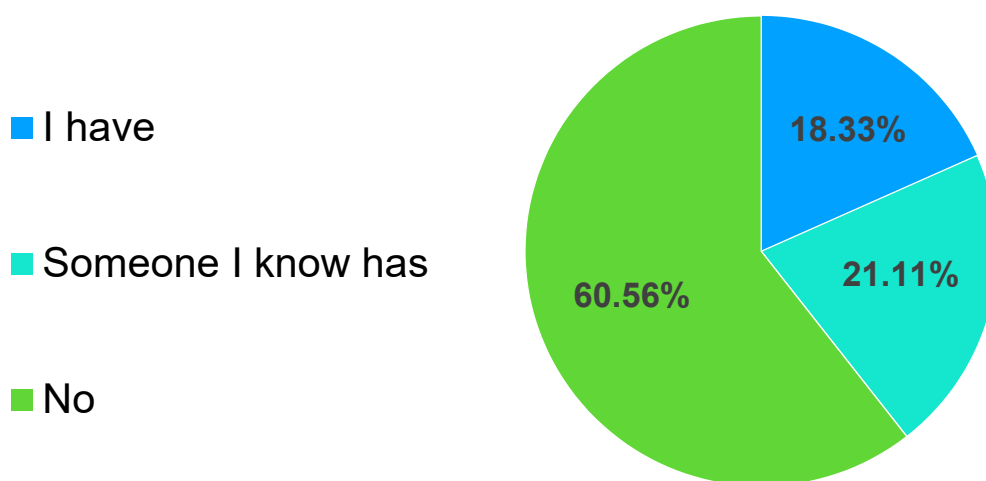
Based on the responses to the scenarios, public awareness of fair housing law seems to be consistently at an average response level (76% and above), with three scenarios at below

average. The three scenarios with below average knowledge relate to treatment of families with children, treatment of persons with disabilities, and treatment of persons with different ethnicity when purchasing a home. This suggests less awareness of the law with respect to treatment of these protected classes.

The resident survey included questions aimed at measuring perceived discrimination, by asking the respondent if they had experienced or if they knew someone that had experienced housing discrimination; who perpetrated the perceived discrimination; the basis for the perceived discrimination; and if any help was sought concerning the incident. About 18% of respondents expressed having experienced housing discrimination in the City of Orlando, and about 21% indicated that they know someone that has experienced housing discrimination in the city. For those respondents, the most frequently cited perpetrators of the discrimination were rental property managers/owners, followed by condominium or homeowner associations, and real estate professionals.

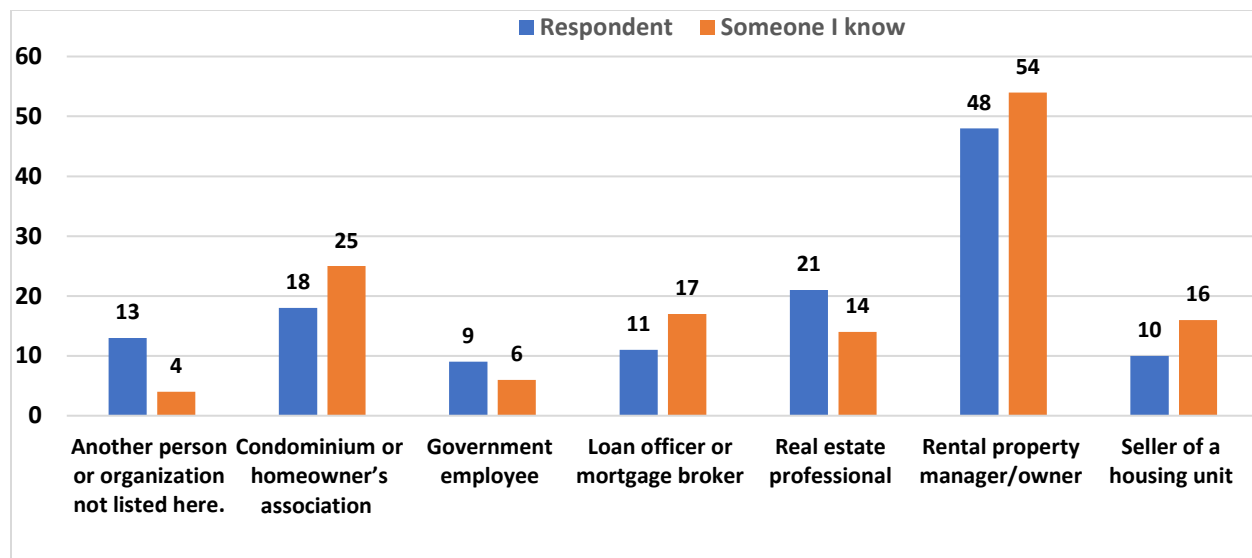
Housing Discrimination Experienced in the City of Orlando -Table

Response	Count
Yes, I have experience housing discrimination.	66
No, but someone I know has.	76
No, I have not experienced it, and neither has anyone that I know.	218
Total	360



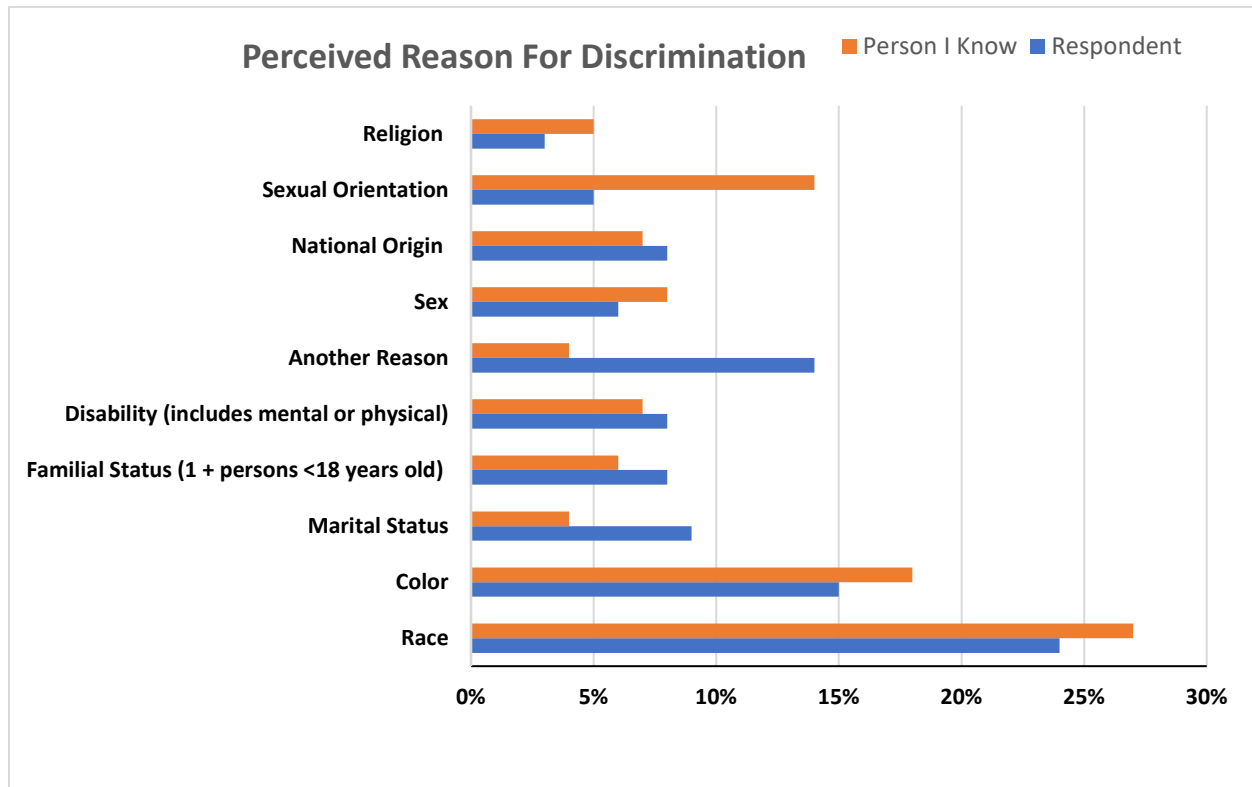
**Person or Organization that Discriminated
Against you/the Person You Know. (Please check all that apply)**

	Respondent	Someone I know
Another person or organization not listed here.	13	4
Condominium or homeowner's association	18	25
Government employee	9	6
Loan officer or mortgage broker	11	17
Real estate professional	21	14
Rental property manager/owner	48	54
Seller of a housing unit	10	16



As for the “Perceived Reason for Discrimination Against Respondents”, 24% cited race as being the reason for discrimination, followed by color at 15%, and “another reason” at 14% . With respect to the “Perceived Reason for Discrimination Against Person I Know”, 27% cited race as being the reason for discrimination, followed by color at 18%, and sexual orientation at 14%.

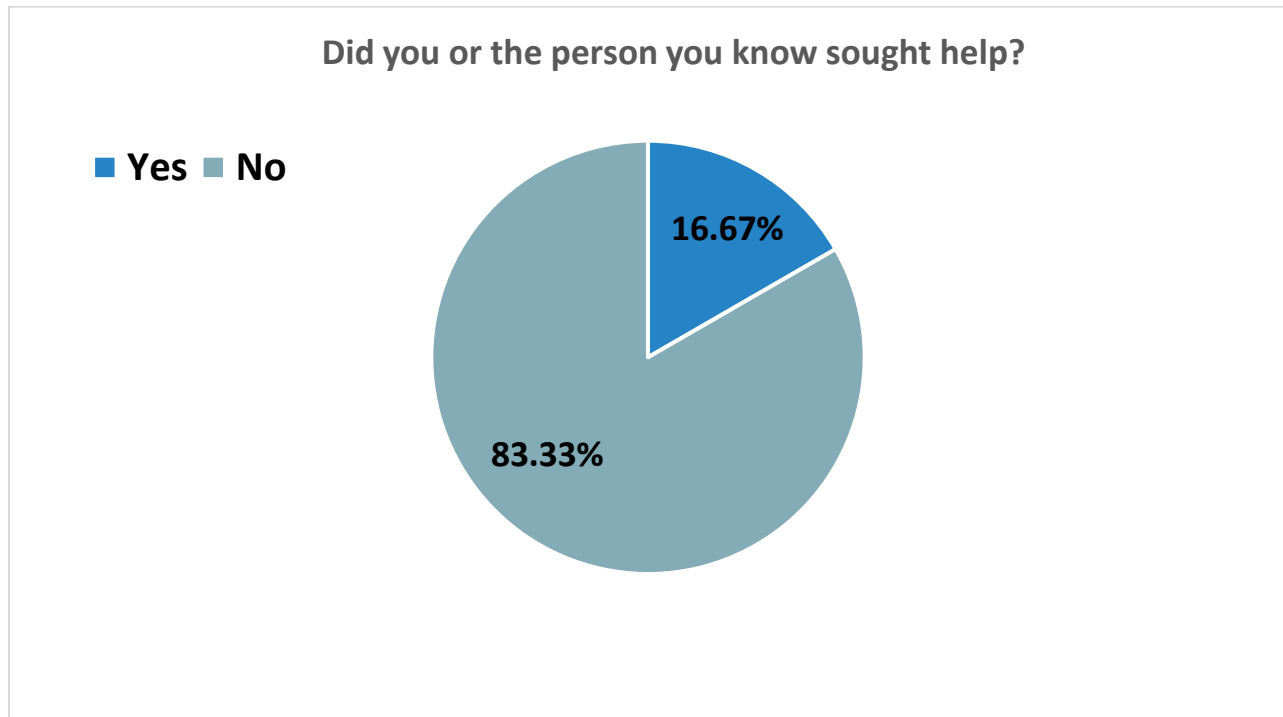
The graphs below show the number of respondents and percentages for both categories – Perceived Reason for Discrimination Against Respondents and Perceived Reason for Discrimination Against Person I Know.



Under other reasons for discrimination, the following summarizes the reasons offered:

- Income, bullying, intimidation
- Not accepting housing voucher,
- Criminal background,
- Age,
- Having a service animal,
- Institutional racism
- Single mother with disabled child,
- Gender identity,
- Retaliation for having complained.
- For being young person with children
- Very low income

Of those who perceived having been discriminated or knew of someone being discriminated, almost eighty-four percent (83.33%) of respondents did not seek help for the discrimination. Only 16.67% sought help.



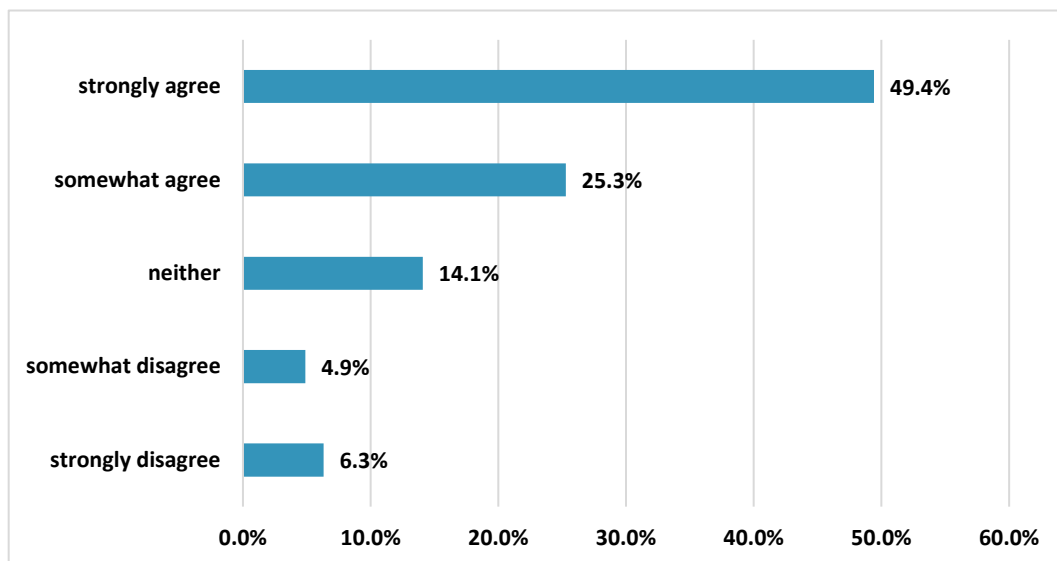
Among the reasons given for not seeking help were the following:

- Nobody cares
- Orlando won't do anything about it
- I would lost my apartment
- Fear of backlash
- Didn't want to go through that anguish – didn't want to live with people who did not want her/him.
- My voice doesn't matter
- Not worth the effort
- Won't do any good, pretty much normal at this point.
- They thought it was the Association legal rights
- Nothing will happen
- It's a waste of time
- Doesn't make a difference
- Because of Florida history and racism
- I didn't know where to go
- Takes too long, and no money for lawyers
- It was 20 years ago and didn't know better
- Were really young and didn't have guidance
- Could not prove it
- Finances
- Was a person's home
- Ignorance
- Knowledge
- Don't know where to start, or go
- Found rental elsewhere
- Laws aren't very clear. Orlando should establish that every landlord should accept housing vouchers
- No publicity
- Who is going to fight the bank?
- There are tons and tons of racist people in Orlando

With respect to residents' opinions about affordable housing choices in Orlando, 49.4% strongly agree that affordable housing choices are limited to certain areas or neighborhoods in the City of Orlando.

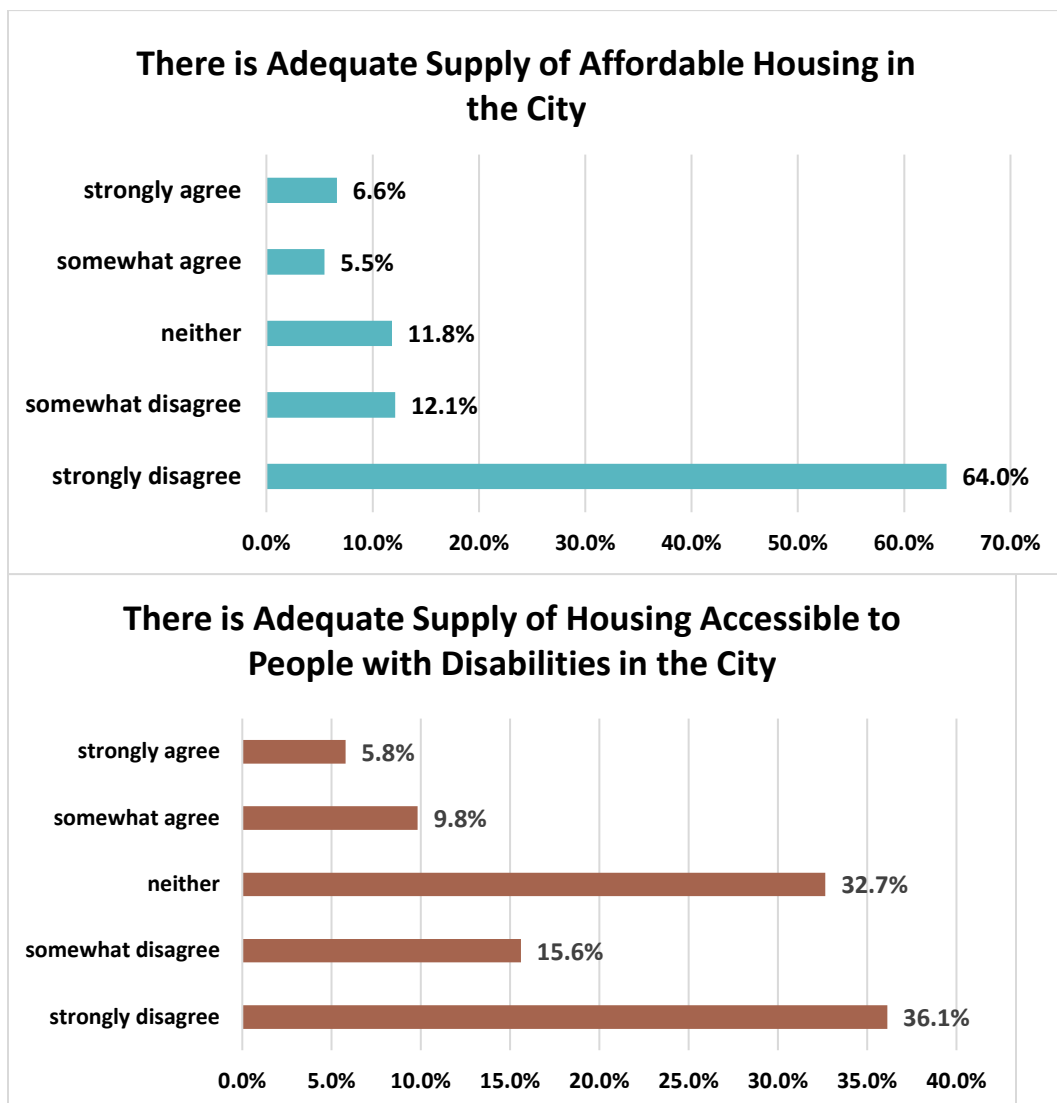
**AFFORDABLE HOUSING CHOICES ARE LIMITED TO CERTAIN AREAS
OR NEIGHBORHOODS IN THE CITY.**

Strongly disagree	22	6.3%
Somewhat disagree	17	4.9%
Neither agree nor disagree	49	14.1%
Somewhat agree	88	25.3%
Strongly agree	172	49.4%
	348	100.0%



Regarding if there is an adequate supply of affordable housing in the city, 64% of resident respondents strongly disagree with the statement; while only 36.1% strongly disagree with the statement that there is an adequate supply of housing that is accessible to people with disabilities in the city.

	There is adequate supply of affordable housing in the City of Orlando		There is adequate supply of housing that is accessible to people with disabilities in the City of Orlando	
Strongly Disagree	222	64.0	125	36.1%
Somewhat disagree	42	12.1%	54	15.6%
Neither Agree nor Disagree	41	11.8%	113	32.7%
Somewhat agree	19	5.5%	34	9.8%
Strongly agree	23	6.6%	20	5.8%
Total Respondents	347	100.0%	346	100.0%



The top three issues restricting the selection of housing in Orlando are cost of rent/mortgage in a preferred neighborhood; poor credit history or low credit score; and crime in the area. By far the biggest issue among the housing restrictions is affordability with 76% of respondents ranking it as significant. Please see below a table summarizing the respondent's perceptions of what restricts housing in Orlando. Tables depicting housing issues percentages by grading categories ranging from "Not at All" to "Significantly" are depicted below.

Resident: Housing Issues

Understand respondents' perceptions of what restricts housing in Orlando

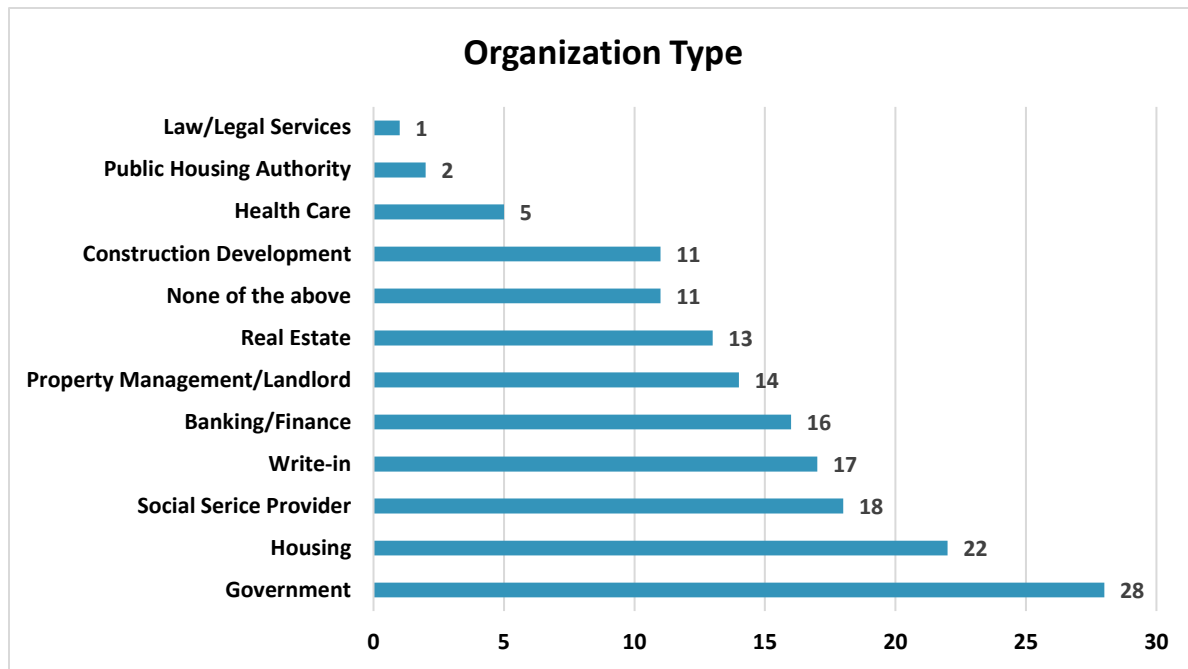
Issues Ranked by Percentage of "Significantly" Responses		Issues Ranked by Percentage of "Moderately" Responses		Issues Ranked by Percentage of "Slightly" Responses	
Housing Issue	% Responses for "Significantly"	Housing Issue	% Responses for "Moderately"	Housing Issue	% Responses for "Slightly"
Cost of rent/mortgage in a preferred neighborhood	76%	Size of available apartments/houses too small or too large	32%	Environmental dangers (e.g., lead-based paint, asbestos, landfill)	20%
Poor credit history or low credit score	57%	Not enough nearby places that provide services (e.g., schools, public transit, medical services, shopping centers)	30%	Concern that someone would not be welcome in the neighborhood	17%
Crime in the area	50%	Crime in the area	27%	Not enough infrastructure (e.g., water/sewer connection, roadways, broadband)	15%
Not enough units that accommodate a disability (e.g., wheelchair-accessible, supportive housing)	32%	Concern that someone would not be welcome in the neighborhood	25%	Not enough nearby places that provide services (e.g., schools, public transit, medical services, shopping centers)	14%
Not enough nearby places that provide services (e.g., schools, public transit, medical services, shopping centers)	31%	Not enough units that accommodate a disability (e.g., wheelchair-accessible, supportive housing)	23%	Size of available apartments/houses too small or too large	14%
Size of available apartments/houses too small or too large	28%	Not enough infrastructure (e.g., water/sewer connection, roadways, broadband)	22%	Not enough units that accommodate a disability (e.g., wheelchair-accessible, supportive housing)	11%
Concern that someone would not be welcome in the neighborhood	24%	Environmental dangers (e.g., lead-based paint, asbestos, landfill)	18%	Crime in the area	7%
Not enough infrastructure (e.g., water/sewer connection, roadways, broadband)	23%	Poor credit history or low credit score	15%	Poor credit history or low credit score	5%
Environmental dangers (e.g., lead-based paint, asbestos, landfill)	18%	Cost of rent/mortgage in a preferred neighborhood	9%	Cost of rent/mortgage in a preferred neighborhood	3%

Issues' Restriction on Housing 323

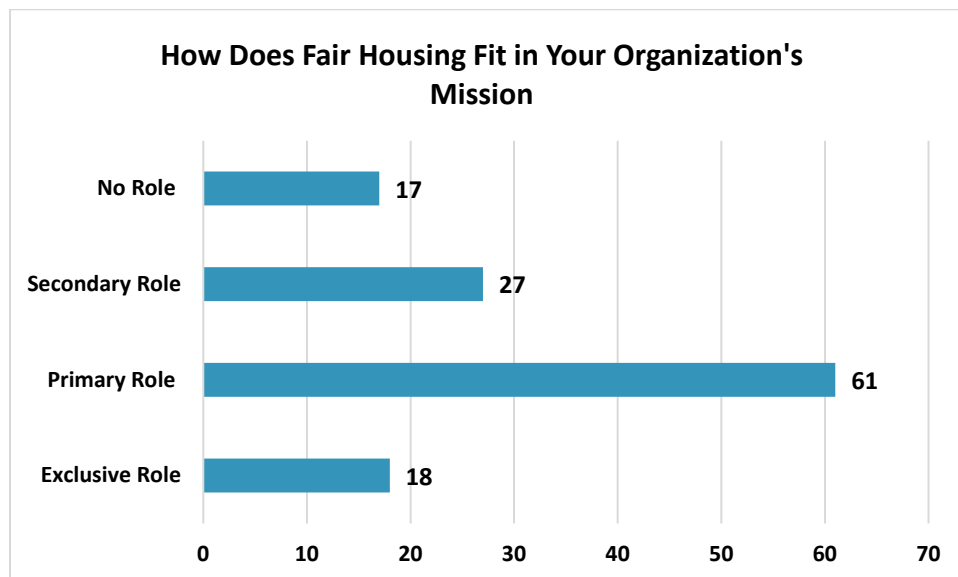
Housing/Issues	Not at all	Slightly	Moderately	Significantly	Don't know/not sure	Total Responses
Cost of rent/mortgage in a preferred neighborhood	15	8	28	244	25	320
Poor credit history or low credit score	26	16	48	182	47	319
Crime in the area	15	23	83	158	33	312
Not enough units that accommodate a disability (e.g., wheelchair-accessible...	26	34	73	100	87	320
Not enough nearby places that provide services (e.g., schools, public trans...	43	44	95	97	39	318
Size of available apartments/houses too small or too large	35	43	103	89	48	318
Concern that someone would not be welcome in the neighborhood	47	55	80	76	58	316
Not enough infrastructure (e.g., water/sewer connection, roadways, broadband...	56	47	69	73	74	319
Environmental dangers (e.g., lead-based paint, asbestos, landfill)	44	64	57	57	97	319

Organization Survey

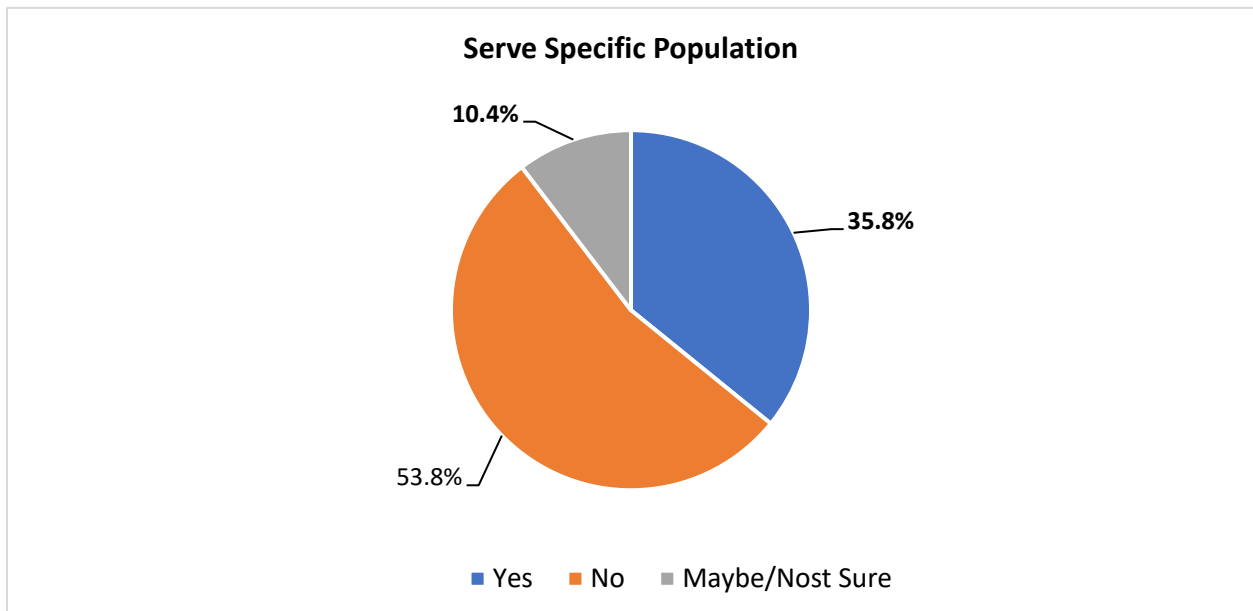
The Organization Fair Housing Survey received a total of 158 responses. The types of organizations that responded are shown below, with governmental agencies participating the most.



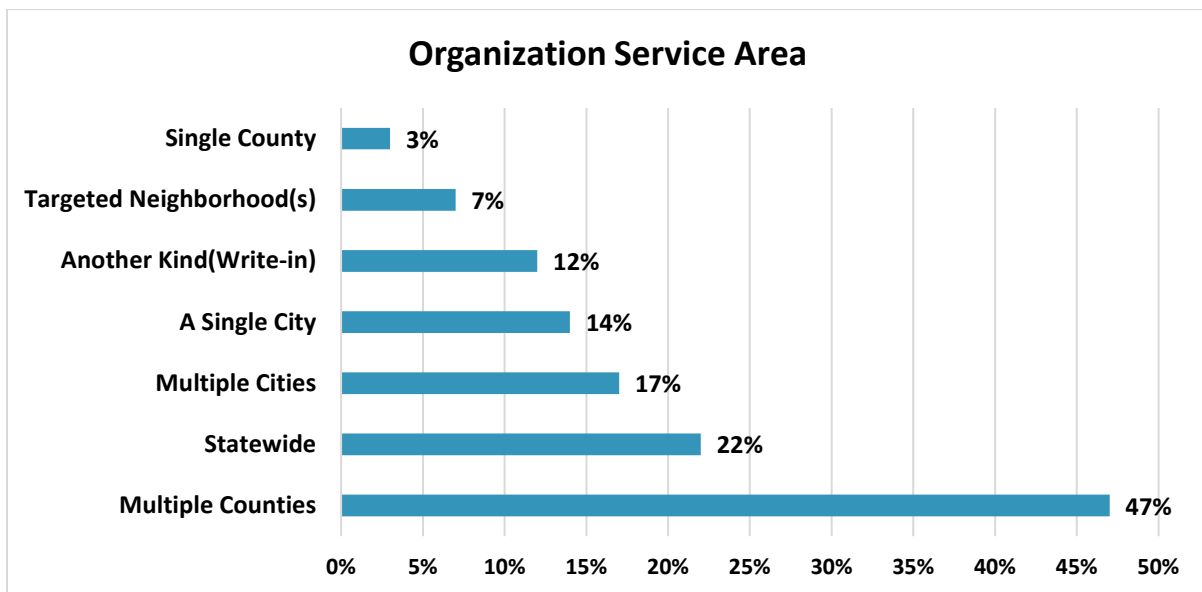
Organizations were asked to indicate the role fair housing plays in their mission. Of the 123 organizations that answered this question, approximately 50% specified that it plays a primary role and about 15% said it plays an exclusive role.



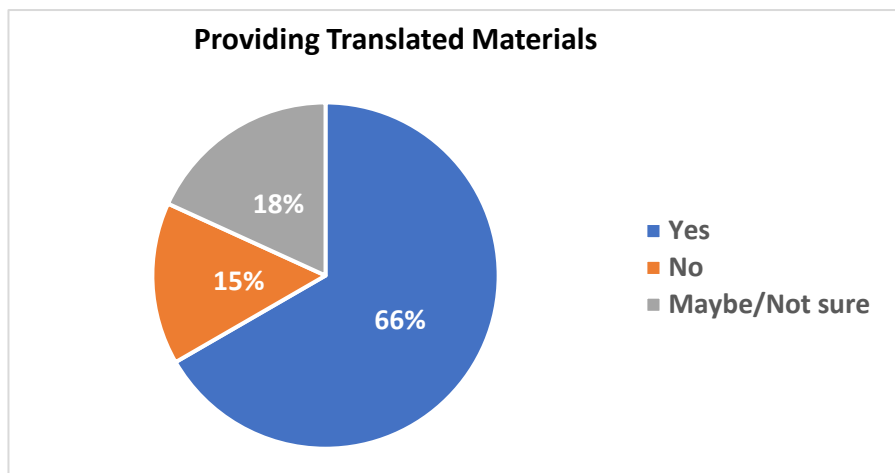
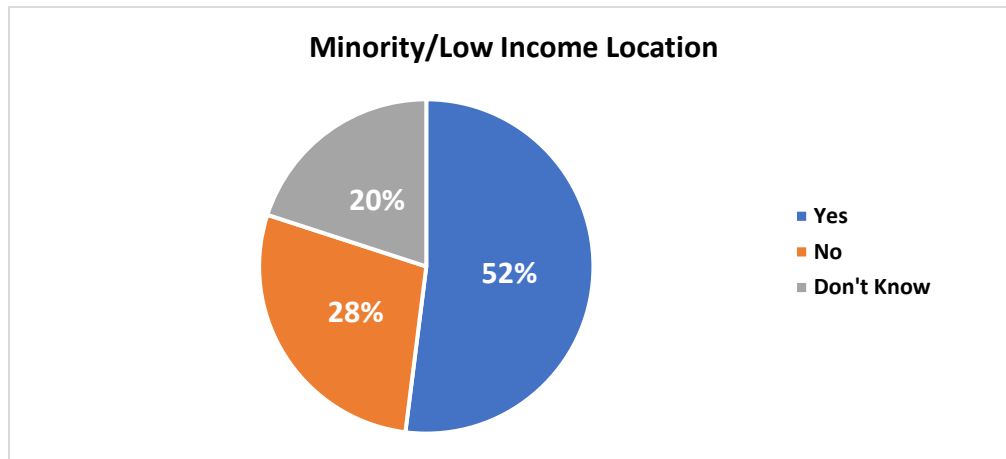
About 53.8% of the organizations focused their services on a particular target group.



The majority of the organizations served an area larger than a neighborhood, city, or county, with 47% serving multiple counties, 22% serving statewide area, and 17% serving multiple cities.



In terms of location, 52% of the organizations are located in a minority and/or low-income neighborhood; and 66% provide information and marketing materials, including advertisements in languages other than English.



The majority of the organizations have received grants related to community development and/or housing. Their knowledge of fair housing laws was rated above the "moderately knowledgeable", and 86% of organizations learn about fair housing through meetings, trainings or seminars.

Grants Received vs Housing Knowledge ⁶³										
GrantsReceived	Not knowledgeable at all		Slightly knowledgeable		Moderately knowledgeable		Very knowledgeable		Extremely knowledgeable	
	Count	Count	Count	Count	Count	Count	Count	Count	Count	Count
Community Development Block Grant (CDBG) Program	-	0%	1	2%	5	8%	8	13%	13	21%
Emergency Solutions Grant (ESG) Program	-	0%	1	2%	3	5%	6	10%	15	24%
HOME Investment Partnerships (HOME) Program	-	0%	-	0%	4	6%	3	5%	10	16%
Housing Opportunities for People with Aids (HOPWA)	-	0%	-	0%	2	3%	5	8%	11	17%
HUD Supportive Housing Program (Continuum of Care)	-	0%	-	0%	3	5%	6	10%	17	27%
My organization has received grants from other Federal, State or Local Grant Program(s):	1	2%	2	3%	6	10%	11	17%	21	33%
State Housing Initiatives Partnership (SHIP) Program	-	0%	-	0%	4	6%	4	6%	13	21%

The organizations were asked to assess the effectiveness of current fair housing laws, programs, and enforcement mechanisms. Of the 96 responses received, only 40% of respondents answered that they are extremely effective or very effective.

Effectiveness of Current Fair Housing Laws

	Count	% of Total
Not effective at all	8	8.33%
Slightly effective	15	15.63%
Moderately effective	35	36.46%
Very effective	29	30.20%
Extremely effective	9	9.38%
Total	96	100%

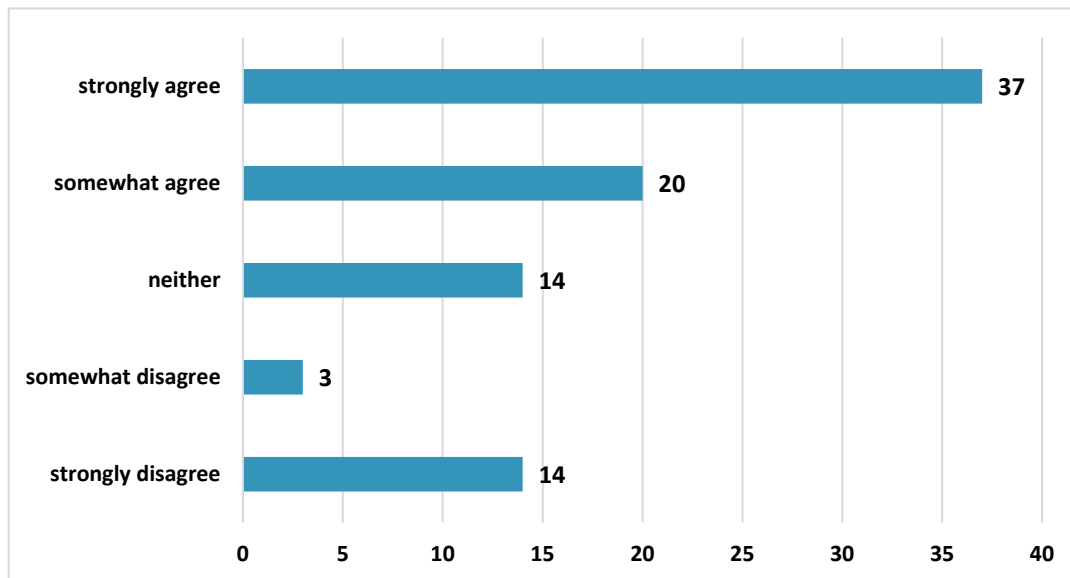
The reasons given for their response to be not effective at all, slightly effective, and moderately effective are listed below:

Perceived Effectiveness	Reasoning
Not Effective at All	<ul style="list-style-type: none"> Overpriced, unfair, confusing, unjust. Excess boundaries, unrealistic down payments, housing scams with no repercussions. Too pricey, unfair to disenfranchise folks, requirements are ridiculous. Because it isn't taking into consideration what people are actually making. Lots of people cannot afford to live here and don't have other options unfortunately You really don't know about the laws. They are only for the persons who want to stay in city limits. The government is the problem. You give people the impression they deserve better than they can afford.
Slightly Effective	<ul style="list-style-type: none"> There are still too many people unable to obtain mortgages and rental homes. Not enough enforcement and disparate impacts. Limited resources or the resources available are very ran down. there is no accessible way for our participants to pursue legal action for discrimination, as attorneys are expensive, most properties are corporate owned (they can outspend individuals), and there are still many things that are legal to disqualify folks from accessing housing (credit, criminal history, income requirements). Not enough protection for low income/high barrier citizens. I'm not fully knowledgeable in this subject but I do know that bias exists and that will never make fair housing laws extremely effective. Residents inaccessibility to Fair Housing Law information. The limited approval by municipalities. Hinders people.

Perceived Effectiveness	Reasoning
Moderately Effective	<ul style="list-style-type: none"> • The employees or volunteers are not honest. • People being knowledgeable. • Abundance of materials and information distributed citing laws. • Reporting and enforcement infrastructure could be robust. Laws can be more inclusive. • It provides limitations. • Because despite policies and laws in place, there is still housing discrimination happening. • It discourages discrimination but doesn't prevent it. • It does not account for those who experience discrimination based on eviction, criminal and credit history. • While they protect against discrimination for certain populations, they do not provide protections for people with low incomes who may need to pay for housing through third-party payers, such as through a housing voucher. Low-income people with vouchers can be discriminated against because landlords can restrict what types of payments they want to accept. • With our current political climate, it is difficult to house those who are in special populations and/or impacted by homelessness. We do not have enough housing. • After COVID not all the landlords are offering access to their properties as easily as it was done before (comment originally written in Spanish: "Despues de covid no todos los landlors ofrecen acceso a sus propiedades con la misma facilidad que antes"). • No idea just an assumption. • Hard to prove that they have been broken, hard to enforce. • There always areas to improve. • Not all communities comply with fair housing. • Some of the original teeth have been gutted. • I don't have an answer. • Little to no information. • We need more affordable housing for seniors. • New resources every day coming in. • Rules are often vague, so it is difficult to know if you are complying with them. They aren't well enforced (generally relying on complaints). • Hard to monitor their effectiveness in the community. • Implementation of various programs often lack consistency. • Most people who are discriminated against in housing do not file a complaint, either because they are not aware of the law, they don't know that they were treated differently, they are too busy, or they don't know how to complain. Discrimination is difficult to prove, so even those who do file complaints have a difficult time obtaining redress.

With respect to organizations' opinions about affordable housing choices in Orlando, 42% strongly agree and 23% somewhat agree that affordable housing choices are limited to certain areas or neighborhoods in the City of Orlando, while 16% strongly disagree.

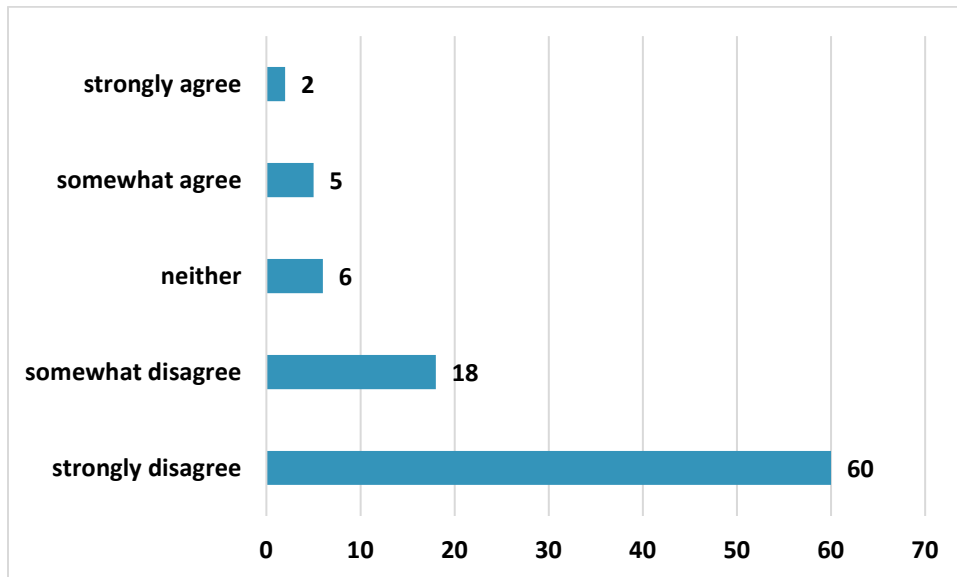
**AFFORDABLE HOUSING CHOICES ARE LIMITED
TO CERTAIN AREAS OR NEIGHBORHOODS IN THE CITY.**



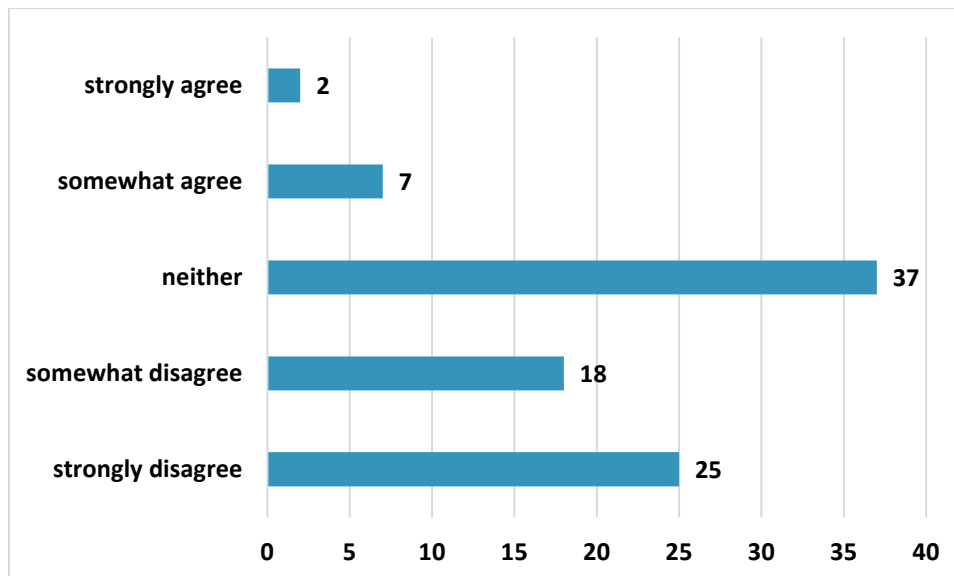
Regarding if there is an adequate supply of affordable housing in the city, 66% of respondents strongly disagree with the statement; while only 28% strongly disagree with the statement that there is an adequate supply of housing that is accessible to people with disabilities in the city.

	There is adequate supply of affordable housing in the City of Orlando		There is adequate supply of housing that is accessible to people with disabilities in the City of Orlando	
Strongly Disagree	60	65.9%	25	28.1%
Somewhat disagree	18	19.8%	18	20.2%
Neither Agree nor Disagree	6	6.6%	37	41.6%
Somewhat agree	5	5.5%	7	7.9%
Strongly agree	2	2.2%	2	2.2%
Total Respondents	91	100.0%	89	100.0%

THERE IS AN ADEQUATE SUPPLY OF AFFORDABLE HOUSING IN THE CITY



THERE IS AN ADEQUATE SUPPLY OF HOUSING THAT IS ACCESSIBLE TO PEOPLE WITH DISABILITIES IN THE CITY



Inadequate availability of affordable housing was listed as the major factor (82%) affecting the segregation of residents of protected classes limiting access to community assets. It was followed by insufficient income, the concentration of affordable housing within certain areas in the City of Orlando, poor credit history, excessive rental requirements, and inadequate access to public transportation or employment opportunities. The results from the survey are shown in the tables below.

Organization: Housing Issues

Understand respondents' perceptions of what restricts housing in Orlando:

How much do you think that the things listed below affect the segregation of residents of protected classes and limit access to housing, schools, grocery stores and banks?

Issues' Restriction on Housing 76						
MXHous	Don't know/not sure	Moderately	Not at all	Significantly	Slightly	Total Responses
Insurance agencies or agents refusing to issue policies or limiting coverag...	20	11	8	26	8	73
Insufficient monitoring, oversight, or enforcement of fair housing laws	15	17	6	28	7	73
Inadequate representation of protected classes on real estate advertisement...	17	14	8	26	9	74
Concentration of affordable housing within certain areas in the City of Orl...	5	10	4	47	8	74
Inadequate availability of affordable housing	4	7	0	60	2	73
Excessive rental requirements and procedures imposed on protected classes	13	11	7	40	3	74
Local land use and zoning restrictions	16	9	7	38	6	76
Inability of prospective home buyers to obtain financing based on their pro...	15	13	8	31	7	74
Insufficient income of potential renters and/or homebuyers to qualify	5	7	0	57	5	74
Insufficient or poor credit history of potential renters and/or homebuyers...	9	13	1	44	6	73
Real estate appraisers basing home values of a neighborhood on the resident...	18	16	5	31	5	75
Use of unfair lending practices such as the promotion of subprime mortgages...	21	9	5	26	12	73
Realtors showing properties only in certain areas to prospective buyers bas...	19	13	6	25	11	74
MXHousImp_8 - Lack of housing units that accommodate a disability	22	10	2	34	6	74
MXHousImp_9 - Inadequate access to public transportation or employment opportunities	9	17	3	40	6	75

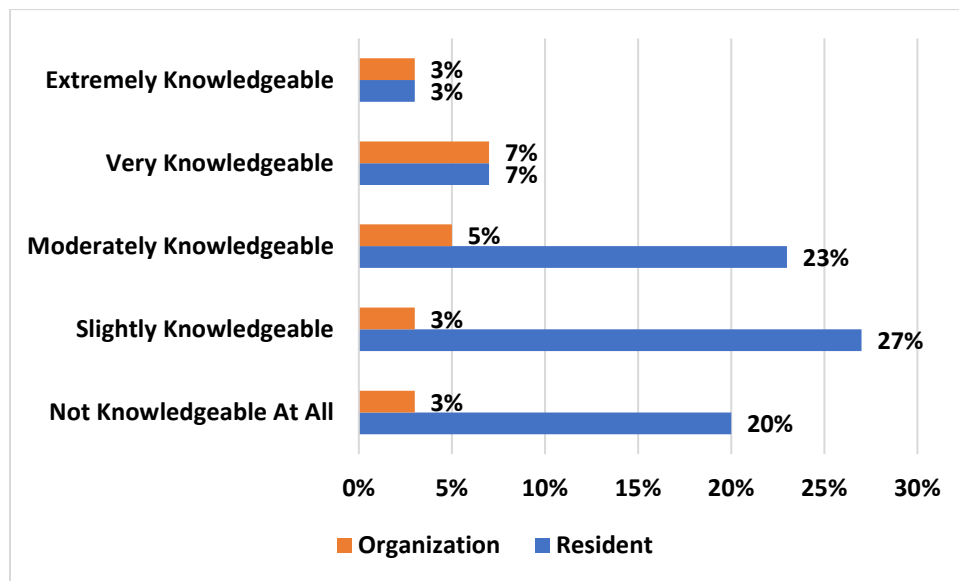
Issues Ranked by Percentage of "Significantly" Responses		Issues Ranked by Percentage of "Moderately" Responses		Issues Ranked by Percentage of "Slightly" Responses	
Housing Issue	% Responses for "Significantly"	Housing Issue	% Responses for "Moderately"	Housing Issue	% Responses for "Slightly"
Inadequate availability of affordable housing	82%	Insufficient monitoring, oversight, or enforcement of fair housing laws	23%	Use of unfair lending practices such as the promotion of subprime mortgages or predatory lending	16%
Insufficient income of potential renters and/or homebuyers to qualify	77%	Inadequate access to public transportation or employment opportunities	23%	Realtors showing properties only in certain areas to prospective buyers based on their protected class status	15%
Concentration of affordable housing within certain areas in the City of Orlando	64%	Real estate appraisers basing home values of a neighborhood on the residents' protected class status	21%	Inadequate representation of protected classes on real estate advertisements	12%
Insufficient or poor credit history of potential renters and/or homebuyers to qualify	60%	Inadequate representation of protected classes on real estate advertisements	19%	Insurance agencies or agents refusing to issue policies or limiting coverage for a person based on their protected class status	11%
Excessive rental requirements and procedures imposed on protected classes	54%	Insufficient or poor credit history of potential renters and/or homebuyers to qualify	18%	Concentration of affordable housing within certain areas in the City of Orlando	11%
Inadequate access to public transportation or employment opportunities	53%				

C. Resident and Organization Comparisons

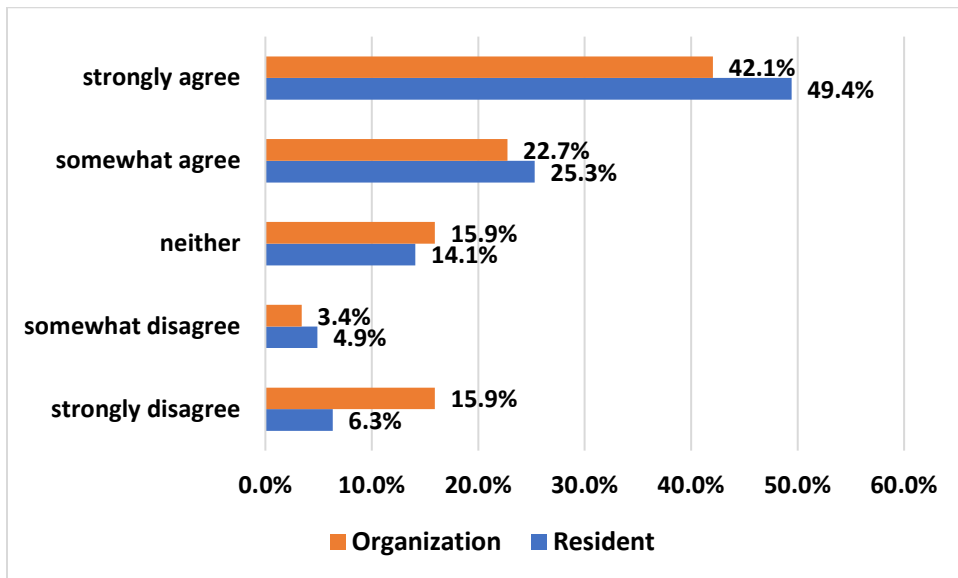
A comparison was done between resident and organization responses in housing issues and knowledge, taking into account that 147 organizations responded and 463 residents responded. The graphs generated are presented below:

Resident and Org Comparisons: Housing Issues and Knowledge

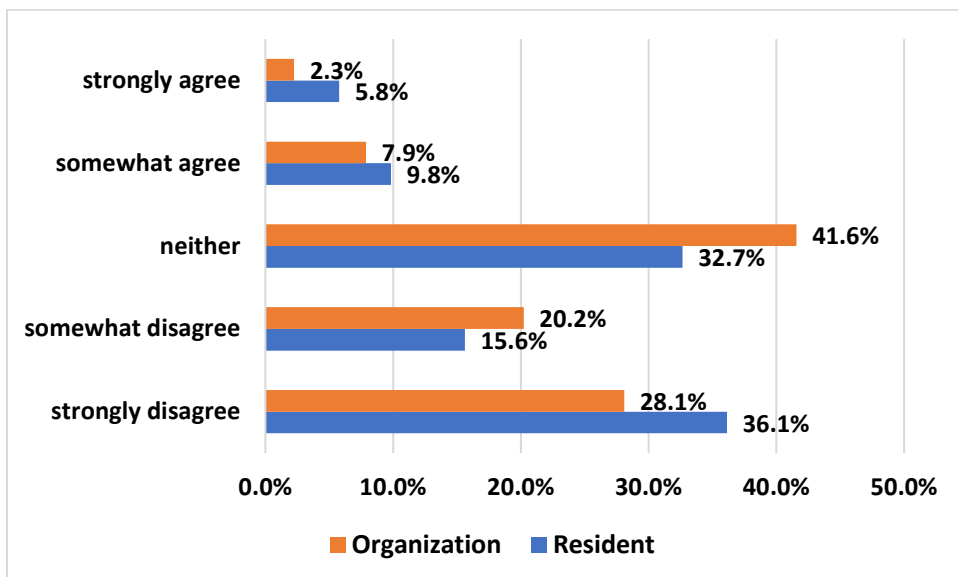
Compare residents and organization members' responses to questions on housing knowledge and issues



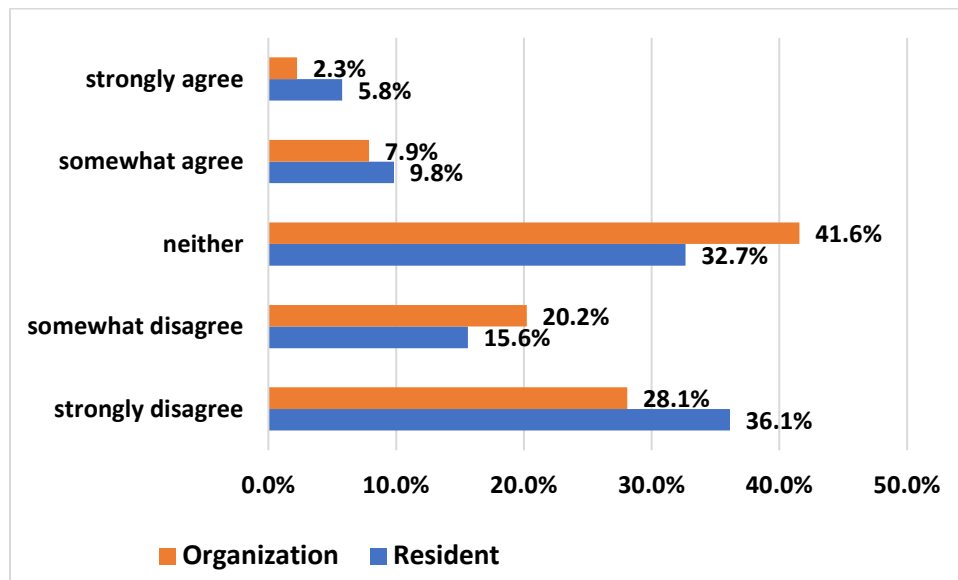
**AFFORDABLE HOUSING CHOICES ARE LIMITED
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**THERE IS AN ADEQUATE SUPPLY OF AFFORDABLE HOUSING
IN THE CITY OF ORLANDO**



**THERE IS AN ADEQUATE SUPPLY OF HOUSING THAT IS ACCESSIBLE
TO PEOPLE WITH DISABILITIES IN THE CITY OF ORLANDO**



D. Open-Ended Questions Analysis

The analysis of the open-ended questions was provided by the City of Orlando Digital Service Designer and Delivery Manager. The full analysis is included in Appendix 3 of this document. Below is a summary of the Analysis.

The survey included two open-ended questions, as follows:

Q1: Are there any suggestions you would like to provide to improve inclusivity and access in our city neighborhoods?

Q2: Are there any additional comments you would like to provide about housing in Orlando?

The most frequent theme when proposing solutions for housing in Orlando (Q1) was to suggest some kind of government oversight to regulate either the cost of housing or who was eligible to own certain properties. Many respondents directly requested “rent control”, limitations on the amount rent could increase annually, or adjustments since rent is currently overpriced.

Other responses reflected a perspective that the Orlando housing market was being dominated by corporations or investors and that these entities should be limited in some way.

Respondents provided solutions related to changes in urban planning across both questions. In particular, solutions related to *inclusionary zoning* (“Inclusionary Zoning,” n.d.) were prevalent.

Across both questions, respondents highlighted issues and proposed solutions related to the locations and varieties of affordable housing present in Orlando. Common points among these responses suggest a need for smaller houses or non-luxury apartments that are available in neighborhoods across the city.

Many respondents mentioned a need for special provisions for certain populations within the city and even suggested specific programs that targeted these populations with aid. The most frequently mentioned population was seniors, but other groups mentioned include one-person households or young adults, families with children, teachers, workers in the tourism industry and historically-disadvantaged residents.

Some respondents drew connections between housing issues and other societal issues, thereby suggesting that progress in addressing crime and homelessness would also indirectly improve housing issues.

In alignment with the knowledge measurement goal of the Fair Housing survey, some respondents suggested more education around a variety of housing topics. A number of more specific strategies were proposed that did not group together well into broader themes. These are included in Appendix 3.

Concerns unique to Q2 included the replacement of established residents with expensive new real estate with certain respondents mentioning “gentrification” directly. Other concerns that arose in response to Q2 related to equity and fairness in the housing process.

Issues with particular requirements for either programs or the rental process were highlighted by respondents.

V. ASSESSEMENT OF FAIR HOUSING

A. Community Reinvestment Act and HMDA Data

The Community Reinvestment Act (CRA) enacted in 1977, requires the Federal Reserve and other federal banking regulators to encourage financial institutions to help meet the credit needs of the communities in which they do business, including low- and moderate- income (LMI) neighborhoods.

Three federal banking agencies, or regulators, are responsible for the CRA. Banks that have CRA obligations are supervised by one of these three regulators. Each regulator has a dedicated CRA site that provides information about the banks they oversee and those banks' CRA ratings and Performance Evaluations.

- Federal Deposit Insurance Corporation (FDIC)
- Federal Reserve Board (FRB)
- Office of the Comptroller of the Currency (OCC)

The Federal Reserve evaluates how well state member banks have helped meet the needs of their communities using one of five evaluation methods tailored to a bank's size or business strategy.

The Federal Reserve makes banks' Performance Evaluation's public through an online database that can be searched using institution or exam criteria or by bank branch location. In addition, each bank is required to maintain a copy of the Performance Evaluation in its public file and make it available to customers upon request.

One of the following overall CRA ratings will be assigned based on the evaluation of a banks' CRA performance:

- Outstanding
- Satisfactory
- Needs to improve
- Substantial Noncompliance

There are four types of CRA ratings as follows:

- Overall rating – all banks are issued an overall rating. This is the institution's primary CRA rating.
- State rating- this rating is generally assigned if a bank has branches in more than one state. A bank that has branches in more than one state is also known as an interstate bank.
- Multistate metropolitan statistical area (MSA) rating – this is assigned if a bank has branches in two or more states within a multistate metropolitan statistical area.
- Component test ratings- Components ratings are assigned to two types of banks: 1) Intermediate Small Banks (ISBs) and 2) Large Banks.

A search of the banks based in the City of Orlando, examined and rated by the FDIC from 2015 to present, are listed below:

FDIC Release Date	Bank Name	City	State	FDIC CRA Rating	Asset Size (in thousands)
4/1/2023	One Florida Bank	Orlando	FL	Satisfactory	\$1,428,073.00
4/01/2023	One Florida Bank	Orlando	FL	Satisfactory	\$351,479.00
3/01/2017	First Green Bank	Orlando	FL	Satisfactory	\$491,385.00
0/01/2016	Florida Bank of Commerce	Orlando	FL	Satisfactory	\$302,200.00
3/1/2015	CNL Bank	Orlando	FL	Satisfactory	1,302,612.00

Other local bank CRA ratings were as follows:

Agency Rater	Date	Bank Name	City	State	Lending Test Rating	Asset Size (in thousands)
FDIC	2018	Surety Bank – small bank	Orlando MSA	FL	Satisfactory	\$125,171.00
CRA	2017	Seaside National Bank - Intermediate Small Bank	Orlando	FL	Satisfactory	N/A
CRA	2019	Seacoast National Bank – Large Bank	Orlando MSA	FL	High Satisfactory	\$7,108,356
FDIC	2018	Branch Banking and Trust Co. Large Bank	Orlando MSA	FL	High Satisfactory	2.19E+08
CRA	2018	Bank of America – Large Bank	Orlando MSA	FL	Outstanding	1.79E+09

HMDA Data

The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975 and was implemented by the Federal Reserve Board's Regulation C at 12 CFR Part 1003 (Home Mortgage Disclosure). On July 21, 2011, the rule-writing authority of Regulation C was transferred to the Consumer Financial Protection Bureau (CFPB). Regulation C requires lending institutions to report public loan data.

The HMDA regulation provides the public loan data that can be used to assist:

- In determining whether financial institutions are serving the housing needs of their communities.
- Public officials in distributing public sector investments so as to attract private investment to areas where it is needed.
- And in identifying possible discriminatory lending patterns.

The HMDA Data Browser can be used to filter and download HMDA data. The data fields used from the public data record were from data year 2021 to include the disposition of various types of loan products at the Census tract level comprising the City of Orlando. These tracts were analyzed to identify loan denial rates for those tracts with higher minority concentration for FHA, VA, and FSA/RHS loan product type, and single family (1-4units) dwelling units. The Census Tracts were also reviewed to determine higher concentration of low/mod income populations per HUD CDBG definitions. Although definite identification of discriminatory lending practices cannot be ascertained by correlation of HMDA data element, analysis of the data provides discernible patterns that may suggest discriminatory lending practices based on minority status.

Based on the Federal Financial Institutions Examination Council (FFIEC) Mortgage Disclosure Act 2021 Loan/Application Records (LAR); Snapshot Nation Loan Level Dataset as of April 30, 2022, for all HMDA reporters the most recent available HMDA data was for 2021. The total loan applications for all City of Orlando's Census Tracts was 8,100, with 1,009 loans denied. The denial rate for the City of Orlando was established to be at 12%. The minority rate for the City of Orlando is 60%.

The table below depicts those Census Tracts where the denial rate exceeds the City of Orlando denial rate.

**Loan Applications, Above Average Minority Denial Rates, and Minority Percentage
by Census Tract City of Orlando, 2021**

Census Tracts	Applications	Minority Applications	% Minority Applications	Minority Denial Rate	CT Low/Mod Percentage
11701	186	119	64%	16%	90%
11702	96	52	54%	13%	98%
12000	337	223	66%	15%	72%
13403	178	93	52%	37%	62%
13503	9	1	11%	100%	74%
13508	35	20	57%	14%	81%
13511	385	213	55%	15%	62%
14503	79	40	51%	13%	65%
14601	237	141	59%	13%	80%
14605	176	114	65%	14%	61%
14606	99	35	35%	35%	64%
14608	108	61	56%	15%	61%
14609	66	40	61%	24%	53%
14703	55	24	44%	15%	54%
16903	218	137	63%	15%	58%

Source: City of Orlando HMDA aggregate Table 2021; and HUD 2022 low/mod data

B. Foreclosure and Eviction Data

According to the Florida Housing Data Clearinghouse during the year 2022, Orange County had 14,475 evictions filed and 1,479 foreclosure filings. These represent a 101% increase in evictions, and a 140% increase in foreclosures, from the year 2021. When comparing 2021 to 2022, it should be noted that the COVID-19 Pandemic continued and instability across several sectors was becoming more apparent. There was also a continued moratorium on evictions that ended. The US Supreme Court ruled to end the CDC's eviction moratorium on August 26, 2021. The effect of foreclosure and eviction rates concerning fair housing was not reviewed in this Report.

C. Fair Housing Complaint Data and Legal Cases

The Office of Human Relations promotes equality of opportunity for citizens of Orlando by advocating policies of nondiscrimination and enforcing City and Federal laws that prohibit discrimination in employment, housing, and public accommodation.

The Office of Human Relations is a certified agent of both the U. S. Equal Employment Opportunity Commission (EEOC) and the U.S. Department of Housing and Urban Development (HUD) .

The office provides the following services:

- Accepts, investigates, and resolves complaints of discrimination through methods of mediation and conciliation, contingent upon the applicable rules and regulations mandated by Chapter 57 of Orlando City Code and contractual agreements with EEOC and HUD.
- Conducts education and outreach activities for the public in order to increase citizen awareness of their rights and the remedies available to them under existing discrimination laws.
- Conducts free training workshops for employers, housing providers and individuals/entities involved in the business of providing access to places of public accommodation. Discussions are general or customized per request; covering topics such as best practices, the basics of existing laws, new amendments to existing laws and new laws and how they affect you.
- Facilitates activities with the Chapter 57 Review Board.

For the Fiscal Year ending September 30, 2022, the Office of Human Relations processed 822 public calls/inquiries pertaining to Equal Employment Opportunity/Affirmative Action and Fair Housing. From the total of calls/inquiries 491 or 60 % pertained to EEO/AA; 163 or 20% pertained to Fair Housing, the remaining were categorized as Other; Of that total, 18 or 2.2% were closed; 37 or 4.5% are under investigation; and 21 or 2.5% were classified as other. One case resulted in a charge during FY 2023.

The Civil Rights Division of the U.S. Department of Justice was created by Congress in 1957 to uphold the civil and constitutional rights of all Americans, particularly some of the most vulnerable member of our society. The Division enforces federal statutes prohibiting discrimination on the basis of race, color, sex, disability, religion, familial status, military status, and national origin. The Assistant Attorney General (AAG) for the Division has the authority to enforce all federal civil rights statutes, with some exceptions.

The Division learns about potential civil rights violations through complaints directly received by the Division, from other agencies and newspaper and television as well as other media outlets. Incoming complaints are reviewed by the Division and research is undertaken to identify potential civil investigations. After investigations are completed, the reviewing attorneys recommend filing suit or closing the investigation. Generally, the Division may try to negotiate a settlement before filing suit in federal court. Newly filed cases are publicly announced via press releases of holding a press conference.

Legal cases regarding fair housing violations in the Orlando area were researched in HUD's website and the U.S. Department of Justice. The following legal cases are examined below for the purpose of understanding fair housing violations that have occurred in our area. They will give a perspective of the nature of the cases and the types of violations that have occurred in the past, and that may be representative to the area.

United States v. Advocate Law Groups of Florida. P.A.

The Civil Rights Division of the U.S. Department of Justice provides an overview of this case in their website, as follows:

On June 10, 2022, the Court entered a Consent Order in *United States v. Advocate Law Groups of Florida, P.A.* (M.D. Fla.). The Second Amendment Complaint, originally filed on August 16, 2021, alleges that Advocate Law Groups of Florida, P.A., Jon B. Lindeman, Jr., Ephigenia K. Lindeman, Summit Development Solutions USA, LLC, and Haralampos "Bob" Kourouklis violated the Fair Housing Act by interfering with Hispanic homeowners' exercise of their fair housing rights by targeting Hispanic homeowners for a predatory mortgage modification and foreclosure rescue scheme. As part of the scheme, defendants charged Hispanic homeowners thousands of dollars for their mortgage modification services, instructed Hispanic homeowners to stop paying their mortgages, and instructed them to stop communicating with their lenders. But defendants did little to provide the promised services, resulting in homeowners paying thousands of dollars in fees with no benefit, and, in many cases, resulting in foreclosures and the loss of homes. The original complaint was filed on October 29, 2018. The Consent Order permanently enjoins defendants from providing any mortgage relief assistance services, requires them to implement nondiscriminatory policies in all real estate-related businesses, and requires reporting and recordkeeping. The Consent Order requires defendants to pay \$95,000 to three Plaintiff-Intervenors and enters a \$4,500,000 judgment, which is suspended based on sworn financial statements showing inability to pay submitted by defendants to the Department. Defendants will be required to resubmit financial statements every six months, and, if any material

misrepresentation or omission is found, the entire judgment will be reinstated. Defendants must also pay a \$5,000 civil penalty to the United States.

In a Press Release published June 10, 2022, the Department announced that the U.S. District Court for the Middle District of Florida has entered a consent order resolving the department's Fair Housing Act claims against Advocate Law Groups of Florida P.A. (ALGF); Jon B. Lindeman Jr.; Ephigenia K. Lindeman; Summit Development Solutions USA LLC (SDS) and Haralampos "Bob" Kourouklis. The consent order enters a judgment against defendants for \$4,595,000 to compensate people who were harmed by defendants' conduct. Of that amount, defendants must pay a total of \$95,000 to the three intervenors, plus a civil penalty to the United States. Most of the monetary judgment is suspended based on evidence of defendants' limited net worth, including financial statements signed by defendants under penalty of perjury. The consent order requires defendants to submit updated financial statements each year during the five-year term of the settlement. If the court determines that defendants made any material misrepresentations or omissions in their original financial statements or in the annual updates, the entire judgment. In addition to monetary relief, the consent order permanently enjoins defendants from providing any mortgage relief assistance services, such as loan modifications or foreclosure defense services, and imposes reporting and recordkeeping requirements for defendants' other real-estate activities.

United States v. Concord Court at Creative Village Partners, LTD, et al.

The Civil Rights Division of the U.S. Department of Justice provides an overview of this case in their website, as follows:

On April 10, 2023, the court entered a consent order in *United States v. Concord Court at Creative Village Partners, LTD, et al.* (M.D. Fla.). On October 6, 2022, the United States filed the complaint and a proposed consent order. The complaint alleges that the defendants, Concord Court at Creative Village Partners LTD., Concord Management LTD., related entities and a property manager, discriminated against families with children in violation of the Fair Housing Act by refusing to issue building access devices to minor residents, prohibiting children from common areas and amenities unless supervised by adults, and misrepresenting the availability of units to families with children at an apartment complex in Orlando, Florida. The consent order requires the defendants to pay \$260,000 to residents who were harmed by their practices and a civil penalty to the United States. The defendants will also implement nondiscrimination policies and provide fair housing training to employees with management or leasing responsibilities at all the residential rental properties they own or operate in Florida. The case was referred to the Division after the U.S. Department of Housing and Urban Development (HUD) received several complaints, conducted an investigation, and issued multiple charges of discrimination.

In a Press Release published October 7, 2022, the Department announced that Concord Court at Creative Village Partners LTD., Concord Management LTD., related entities and a property manager have agreed to pay \$265,000 to resolve allegations that they discriminated against families with children in violation of the Fair Housing Act by imposing unlawful restrictions on

minors at an apartment complex in Orlando, Florida. The complex, Amelia Court at Creative Village, is a Low-Income Housing Tax Credit development with more than 250 market-rate and affordable units. Under the consent order, which must still be approved by the U.S. District Court for the Middle District of Florida, the defendants will pay \$260,000 to residents who were harmed by their practices and a civil penalty to the government to vindicate the public interest. The settlement also requires the defendants to implement nondiscrimination policies and provide fair housing training to employees with management or leasing responsibilities at over 80 residential rental properties they own or operate in Florida.

D. HUD AFFH Data and Mapping Tool (R/ECAPs)

When HUD adopted the AFFH rule, it created a standardized process for fair housing planning that program participants could use to help meet the requirement to affirmatively further fair housing. HUD provided data to conduct local fair housing assessments. This HUD- provided data are periodically updated. During July 10th, 2020, HUD provided AFFH data to update maps and tables. This latest version (titled AFFHT006) was used to prepare this Fair Housing Plan. The data sources varied by topic, for example data for the Racially or Ethnically Concentrated Areas of Poverty was taken from ACS 2011-2015 released July 2017. All data sources are provided in the information presented.

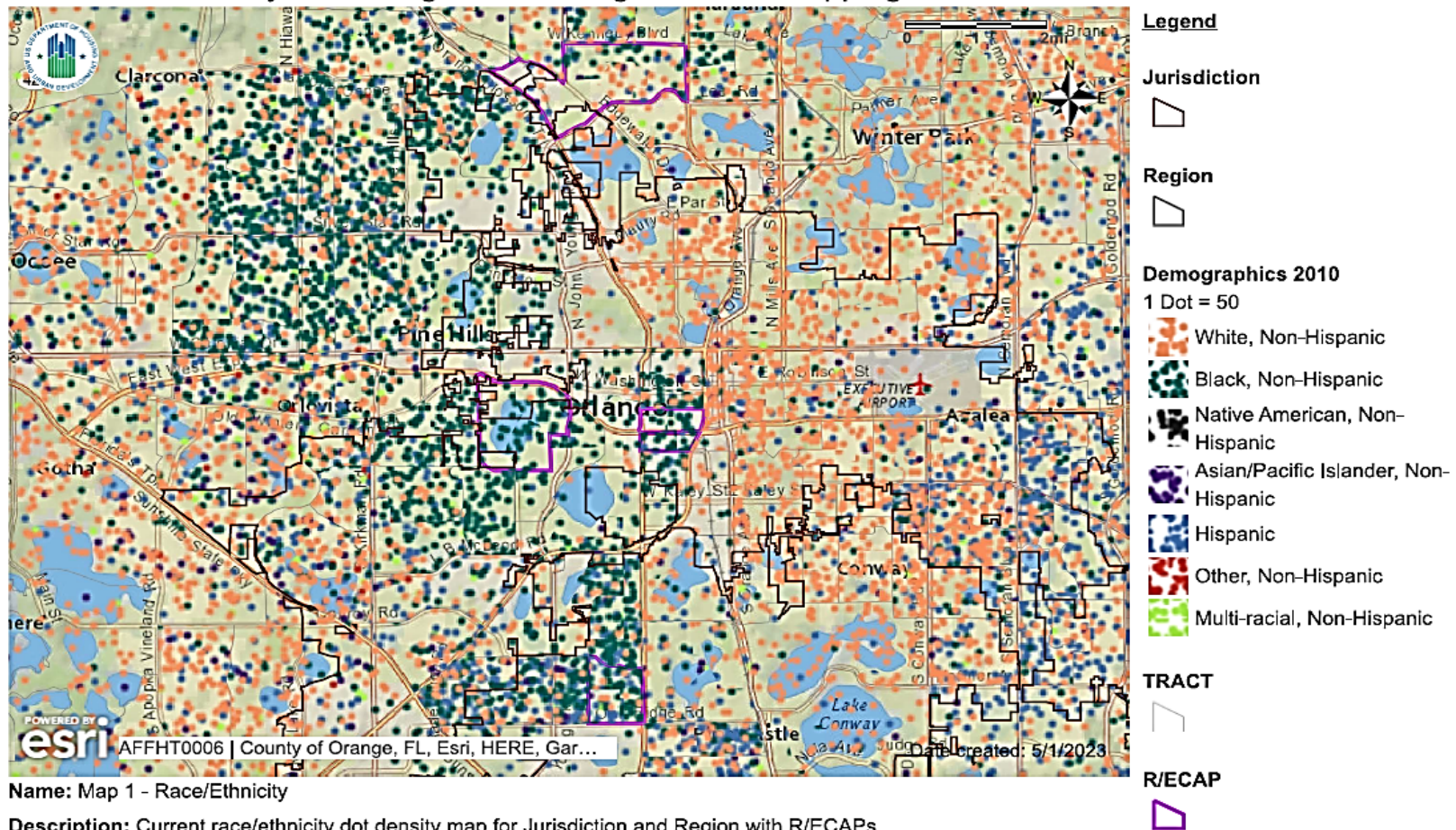
Racially or Ethnically Concentrated Areas of Poverty (R/ECAPS)

To assist communities in identifying racially or ethnically concentrated areas of poverty (R/ECAPs), HUD has developed a census tract-based definition of R/ECAPs. The definition involves a racial/ethnic group concentration threshold and a poverty test. The racial/ethnic group concentration threshold is straightforward: R/ECAPs must have a non-White population of 50 percent or more. Regarding the poverty threshold, Wilson (1980) defines neighborhoods of “extreme poverty” as census tracts with 40 percent or more of individuals living at or below the poverty line.

The following maps depict the areas within the city limits where poverty rates exceed 40% , and areas that meet the definition of RECAPs.

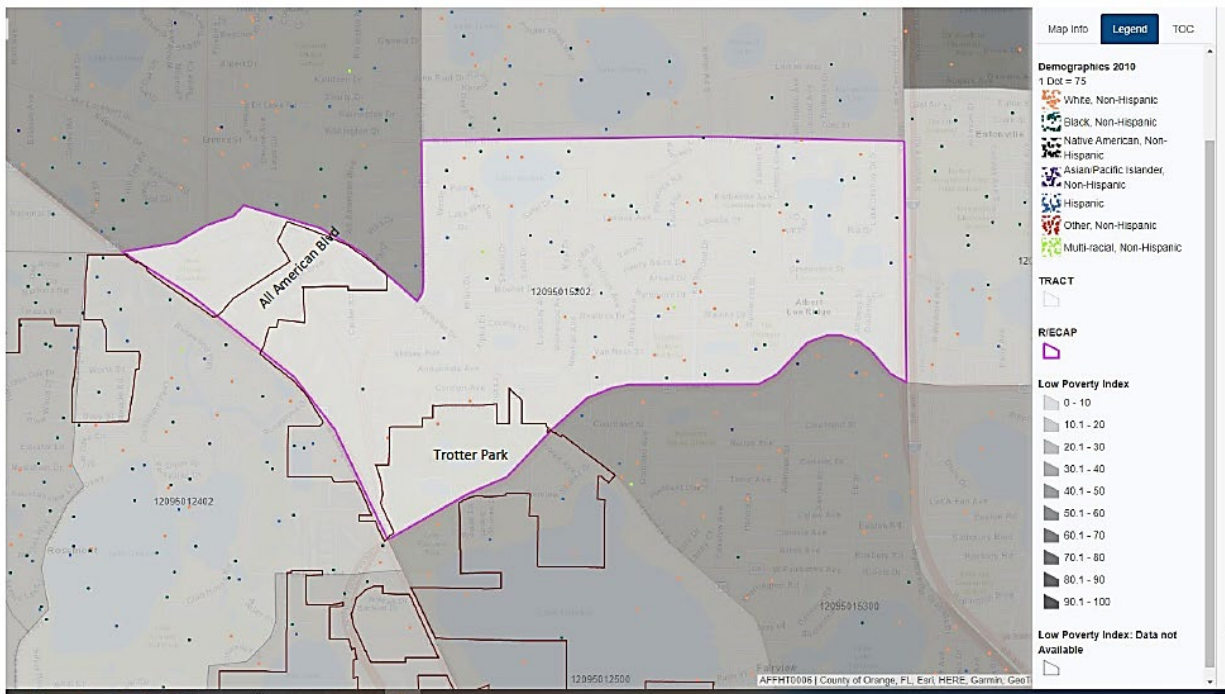
City of Orlando RECAPs

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



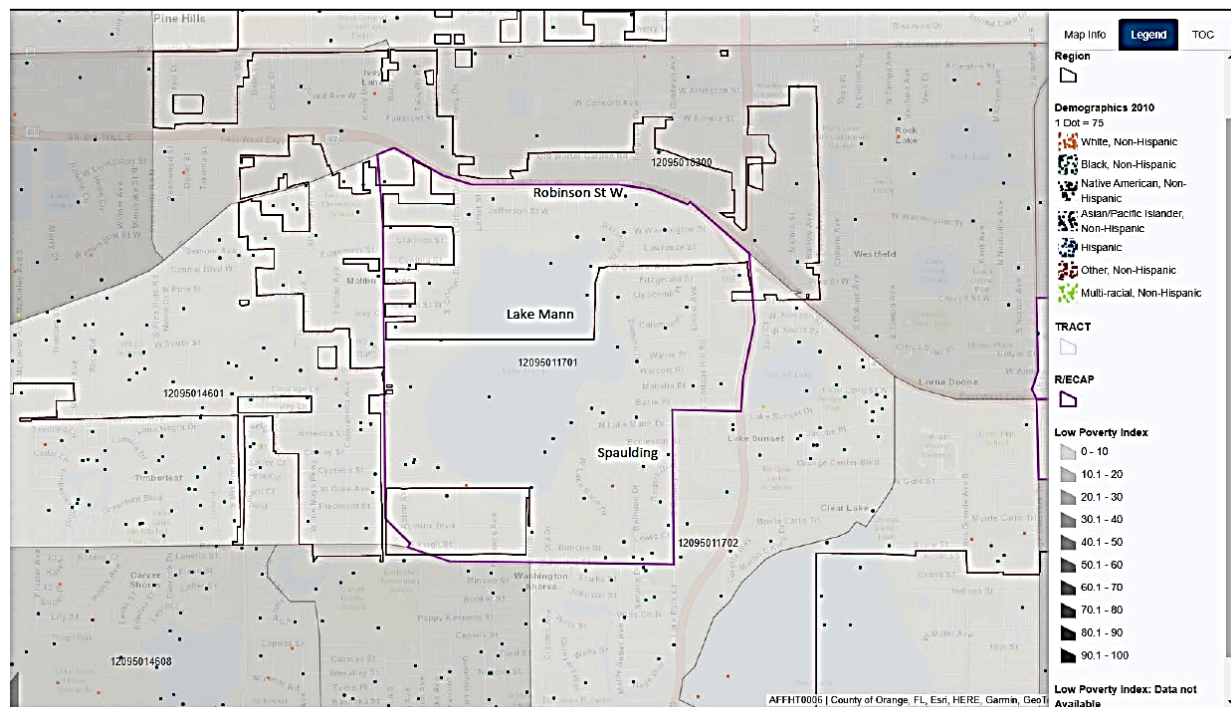
Please see below for additional maps depicting each individual area. The North Area is mostly in the unincorporated area of Orange County.

RECAP 1 (NORTH)



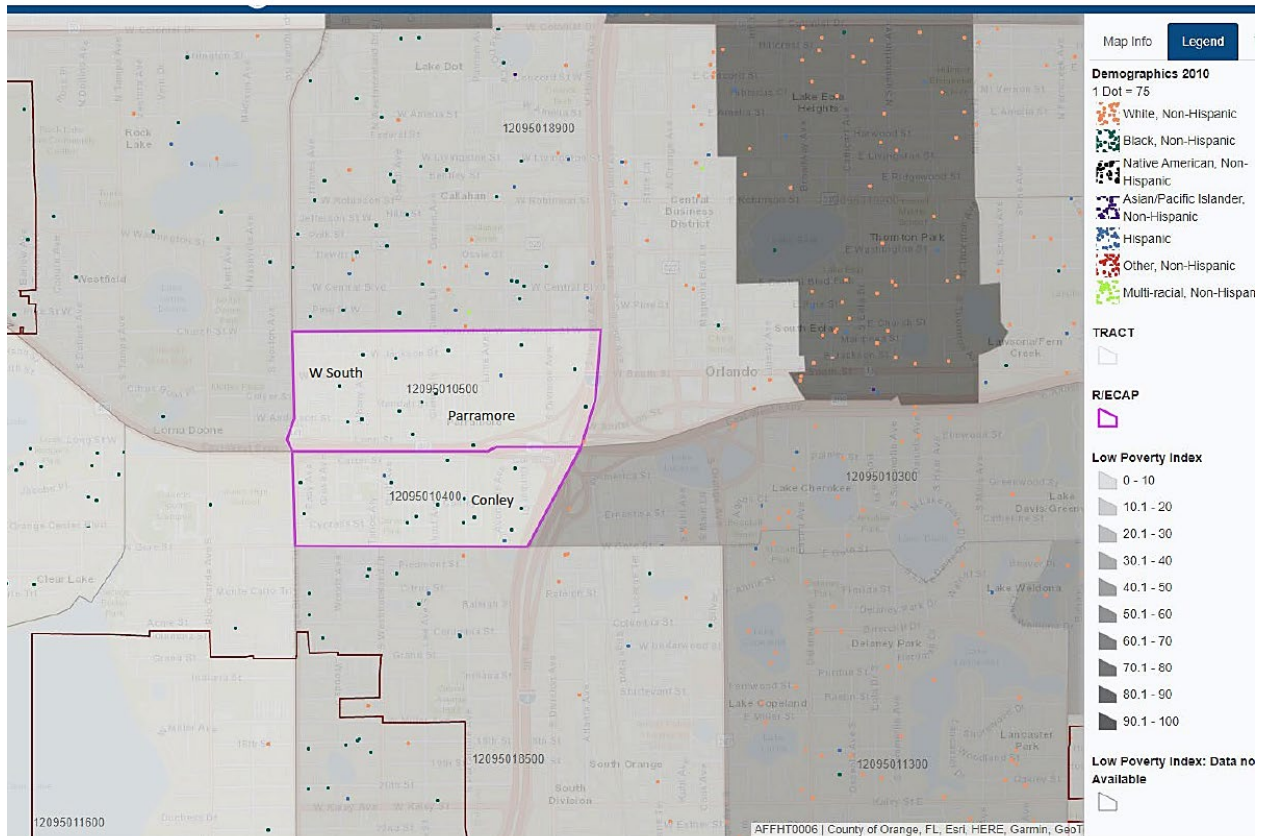
Source: HUD AFFH Mapping Race and Ethnicity Including RECAPs; ACS 2011-15 with Core-based Statistical Area (CBSA) delineations

RECAP 2 (CENTRAL WEST)



Source: HUD AFFH Mapping Race and Ethnicity Including RECAPs; ACS 2011-15 with Core-based Statistical Area (CBSA) delineations

RECAP (Central East)



Source: HUD AFFH Mapping Race and Ethnicity Including RECAPs; ACS 2011-15 with Core-based Statistical Area (CBSA) delineations

Additionally, the Consolidated Plan identifies the income categories in which a racial or ethnic group has a disproportionately greater need than the needs of that income category as a whole. Per regulation 91.205(b)(2), a disproportionately greater need is defined as one racial/ethnic group at a given income level experiencing housing problems at a greater rate (>10%) than the income level as a whole.

Based on the 2015 5-year ACS data, the City of Orlando's population distributed by race is 39% White (alone, not Hispanic or Latino), 26% Black/African American, 3% Asian, 0.2% American Indian/Alaska Native, 0.02% of the population is Native Hawaiian/Pacific Islander, 2% defined under another race, 1% is two or more races, and 29% of the population is Hispanic or Latino (of any race). To keep consistent with the data populated through IDIS, the American Community Survey (ACS) data used to review the overall population in Orlando was the same timeframe as the CHAS data populated through IDIS. Please note, newer data was reviewed in conjunction with this analysis and although numbers grew as the population grew, there is not a significant deviation in the ratios seen between the datasets. The choice was made to not deviate from what was autogenerated by HUD's IDIS program.

E. Segregation/Integration (Dissimilarity Index)

HUD has developed a series of indices to help inform communities about segregation and disparities in access to opportunity in their jurisdiction and region. The dissimilarity index is a commonly used measure of community level segregation. The dissimilarity index represents the extent to which the distribution of any two groups (frequently racial or ethnic groups) differs across census tracts or block groups. The formula can be found in HUD's AFFH-T Data Documentation Version AFFHT0006.

The values of the dissimilarity index range from 0 to 100, with a value of zero representing perfect integration between the racial groups in question and a value of 100 representing perfect segregation between racial groups. The following table is offered by HUD to understand these values:

Measure	Values	Description
Dissimilarity Index	<40	Low Segregation
{range 0-100}	40-54	Moderate Segregation
	>55	High Segregation

The Table Racial/Ethnic Dissimilarity Trends, based on the data and methodology provided by HUD, shows that Orlando has high segregation value for Black/White population when compared to the region as a whole. The table shows a decreasing trend for Black and White population since 1990.

Racial/Ethnic Dissimilarity Trends

**Table 3 - Racial/Ethnic
Dissimilarity Trends**

	(Orlando, FL CDBG) Jurisdiction				(Orlando-Kissimmee-Sanford, FL) Region			
Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	51.81	44.45	41.71	46.28	37.93	39.55	38.32	41.57
Black/White	74.22	68.34	61.28	65.92	58.56	54.90	49.29	53.20
Hispanic/White	27.01	34.10	36.06	39.78	28.80	38.49	40.20	42.31
Asian or Pacific Islander/White	24.37	28.52	28.46	31.47	29.59	34.00	32.36	35.44

Note 1: Data Sources: Decennial Census; HUD AFFH-T Table

[Note 2: Refer to the Data Documentation for details \(www.hudexchange.info/resource/4848/affh-data-documentation\).](http://www.hudexchange.info/resource/4848/affh-data-documentation)

F. Disproportionate Housing Needs

To assist jurisdictions in describing and identifying disproportionate housing needs in their communities and regions, HUD provided data identifying instances where housing problems or severe housing problems exist.

HUD data presents housing problems overall, as well as variations by race/ethnicity, household type and household size. The race/ethnicity categories presented are non-Hispanic White, non-Hispanic Black, Hispanic, non-Hispanic Asian or Pacific Islander, non-Hispanic Native American, and non-Hispanic other. The household type and size categories presented are family households of less than five people, family households of five or more people, and non-family households of any size. Additionally, the data includes the number and share of households with one of the four housing problems: lacks complete kitchen facilities; lacks complete plumbing facilities; more than one person per room; and cost burden or severe cost burden.

In Orlando, Black, Hispanic, and Other Non-Hispanic households experience housing problems and severe housing problems at a higher rate than other race/ethnicity categories within the city. They also experience a higher rate of housing problems and severe housing problems when compared to the region. Households of 5 or more experience housing problems at the highest rate. They also experience a higher rate of housing problems when compared to the region.

Disproportionate Housing Needs	(Orlando, FL CDBG) Jurisdiction			(Orlando-Kissimmee-Sanford, FL) Region		
Households experiencing any of 4 housing problems	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	17,910	50,854	35.22%	144,080	466,275	30.90%
Black, Non-Hispanic	13,130	24,430	53.75%	57,675	114,270	50.47%
Hispanic	14,544	26,899	54.07%	96,190	189,945	50.64%
Asian or Pacific Islander, Non-Hispanic	1,583	3,940	40.18%	9,938	28,201	35.24%
Native American, Non-Hispanic	50	155	32.26%	610	1,238	49.27%
Other, Non-Hispanic	1,285	2,230	57.62%	7,229	16,499	43.81%
Total	48,510	108,525	44.70%	315,700	816,425	38.67%

Disproportionate Housing Needs	(Orlando, FL CDBG) Jurisdiction			(Orlando-Kissimmee-Sanford, FL) Region		
Household Type and Size						
Family households, <5 people	20,835	51,365	40.56%	152,995	470,660	32.51%
Family households, 5+ people	3,440	6,039	56.96%	35,940	72,383	49.65%
Non-family households	24,235	51,120	47.41%	126,760	273,390	46.37%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	8,644	50,854	17.00%	69,240	466,275	14.85%
Black, Non-Hispanic	7,735	24,430	31.66%	32,285	114,270	28.25%
Hispanic	7,644	26,899	28.42%	52,284	189,945	27.53%
Asian or Pacific Islander, Non-Hispanic	777	3,940	19.72%	5,303	28,201	18.80%
Native American, Non-Hispanic	19	155	12.26%	410	1,238	33.12%
Other, Non-Hispanic	770	2,230	34.53%	4,068	16,499	24.66%
Total	25,600	108,525	23.59%	163,570	816,425	20.03%
Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.						
Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.						
Note 3: Data Sources: CHAS						
Note 4: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).						

G. Disparities in Access to Opportunities

According to HUD, in analyzing disparities in access to opportunity, a two-stage process for developing the data needed was used. The first stage involves quantifying the degree to which a neighborhood offers features commonly viewed as important opportunity indicators. In the second stage, HUD compares these rankings across people in particular racial and economic subgroups to characterize disparities in access to opportunities. To focus the analysis, HUD

developed methods to quantify a selected number of the important opportunity indicators in every neighborhood. These dimensions were selected because existing research suggests they have a bearing on a range of individual outcomes. HUD has selected five dimensions upon which to focus: poverty, education, employment, transportation, and health. HUD acknowledges that while these important dimensions are identified by research as important to quality of life, the measures are not without limitations. HUD realizes that there are other opportunity indicators that may be relevant, such as neighborhood crime or housing unit lead and radon levels.

Based on the available data, HUD prepared a table reflecting the indices for low poverty, school proficiency, jobs proximity, labor market engagement, low transportation cost, transit trips, and environmental health for the City of Orlando and for the Orlando-Kissimmee -Sanford Region. The table provides index values documenting the extent to which members of different racial or ethnic groups have access or exposure to particular opportunity indicators. Each index is explained by HUD.

Analysis

In this section each index will be analyzed to determine the degree of disparities in access to opportunities among racial and ethnic groups in the City of Orlando and the Orlando-Kissimmee-Sanford Region. Seven indices will be analyzed: 1) Low Poverty Index, 2) School Proficiency Index, 3) Labor Market Engagement Index, 4) Low Transportation Cost Index, 5) Transit Trips Index, 6) Jobs Proximity Index, and 7) the Environmental Health Index.

Low Poverty Index

This index is based on the poverty rate. It captures poverty in a given neighborhood. It is estimated at the CT level for neighborhoods. The mean and standard error are estimated over the national distribution. *Values are inverted and percentile ranked nationally. The resulting range from 0 to 100. The higher the score the less exposure to poverty in a neighborhood.*

The total population by race/ethnicity in the City of Orlando scored between 22.93 to 46.83, and the same population below the federal poverty line scored between 17.24 to 40.45. Since the higher the score the less exposure to poverty, when compared to the Orlando-Kissimmee-Sanford Region, the City of Orlando population has more exposure to poverty than the region. The populations with the more exposure to poverty were Black, Native American, and Hispanic residents.

Asian/Pacific Islander and White (Non-Hispanic) residents are less exposed to poverty in the city and in the region.

School Proficiency Index

The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby

and which are near lower performing elementary schools. Values are percentile ranked at the state level and range from 0 to 100. *The higher the score, the higher the quality of the school system in a neighborhood.*

The City of Orlando shows a lower quality of school system when compared to the region. Within the city, White, and Asian/Pacific Islander residents have the highest level of access to proficient schools, while Black, and Hispanic residents have the lowest level.

Labor Market Engagement Index

The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. *Values are percentile ranked nationally and range from 0 to 100. The higher the score, the higher the labor force participation and human capital in a neighborhood.*

The City of Orlando shows a higher labor force participation when compared to the region. White and Asian/Pacific Islander residents show a higher labor force participation in the City of Orlando as well as regionally. Black residents show the lowest labor force participation in the city and in the region.

Transit Trips Index

This index is based on estimates of transit trips taken by a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region (i.e., CBSA). *Values are percentile ranked nationally, with values ranging from 0 to 100. The higher the value, the more likely residents in that neighborhood utilize public transit. The index controls for income such that a higher index value will often reflect better access to public transit.*

The City of Orlando shows a higher incidence of the total population, regardless of race/ethnicity, as utilizing public transit. The use of public transit in the city is higher than in the region. In the region, the race/ethnic group with the lowest use of public transit are White.

Low Transportation Cost Index

This index is based on estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region (i.e., CBSA). *Values are inverted and percentile ranked nationally, with values ranging from 0 to 100. The higher the value, the lower the cost of transportation in that neighborhood. Transportation costs may be low for a variety of reasons, including greater access to public transportation and the density of homes, services, and jobs in the neighborhood and surrounding community.*

The City of Orlando shows a lower cost of transportation for the total population regardless of race/ethnicity. The index for the city is above average whereas in the region the cost of transportation is higher.

Jobs Proximity Index

The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a Core Based Statistical Areas (CBSA), with larger employment centers weighted more heavily. *Values are percentile ranked at the CBSA level with values ranging from 0 to 100. The higher the index value, the better the access to employment opportunities for residents in a neighborhood.*

The City of Orlando job proximity index is above average for all populations except for Native American. The city offers better access to employment opportunities for residents than the region.

Environmental Health Index

The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. *Values are inverted and then percentile ranked nationally. Values range from 0 to 100. The higher the index value, the less exposure to toxins harmful to human health. Therefore, the higher the value, the better the environmental quality of a neighborhood, where a neighborhood is a census tract.*

The environmental quality for the City of Orlando and the Region is below average for all populations.

Table 12 - Opportunity Indicators, by Race/Ethnicity

(Orlando, FL CDBG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Trips Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	45.66	49.98	68.77	75.92	59.15	68.93	21.74
Black, Non-Hispanic	22.93	26.60	35.71	77.00	61.23	68.49	23.57
Hispanic	34.61	32.08	54.75	74.08	59.61	53.66	21.46
Asian or Pacific Islander, Non- Hispanic	46.83	45.34	66.51	73.20	57.84	65.13	22.23
Native American, Non-Hispanic	35.53	39.02	55.74	74.60	59.30	64.50	22.11

Population below federal poverty line							
White, Non-Hispanic	38.81	47.66	64.16	77.55	62.50	69.64	21.25
Black, Non-Hispanic	17.24	33.14	31.05	77.25	61.03	72.26	23.13
Hispanic	28.85	29.10	49.55	76.34	62.38	51.70	21.08
Asian or Pacific Islander, Non-Hispanic	40.45	45.40	61.01	75.19	64.00	67.48	22.23
Native American, Non-Hispanic	16.56	20.53	39.17	81.48	70.68	27.06	20.03
(Orlando-Kissimmee-Sanford, FL) Region							
Total Population							
White, Non-Hispanic	53.89	54.50	54.48	48.68	36.53	42.64	34.19
Black, Non-Hispanic	34.27	36.07	39.77	55.04	44.13	45.71	31.30
Hispanic	41.41	42.55	46.75	50.79	39.58	36.90	31.28
Asian or Pacific Islander, Non-Hispanic	52.91	52.16	59.17	51.84	38.61	46.41	31.52
Native American, Non-Hispanic	44.44	45.94	46.65	49.10	38.25	40.57	33.58
Population below federal poverty line							
White, Non-Hispanic	46.40	49.06	48.76	52.36	40.54	44.27	33.80
Black, Non-Hispanic	26.60	35.30	32.35	57.66	47.43	50.99	30.56
Hispanic	35.79	37.75	42.77	53.51	42.92	38.68	30.42
Asian or Pacific Islander, Non-Hispanic	52.30	47.74	55.29	52.91	41.41	43.14	31.25
Native American, Non-Hispanic	34.52	43.76	38.46	59.27	49.99	57.31	27.73
Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA							
Note 2: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).							

H. Disability and Access

In Orlando, among the civilian non-institutionalized population based on the US Census 2017-2021 ACS 5-Year Estimates, 9.6% reported a disability. The likelihood of having a disability varied

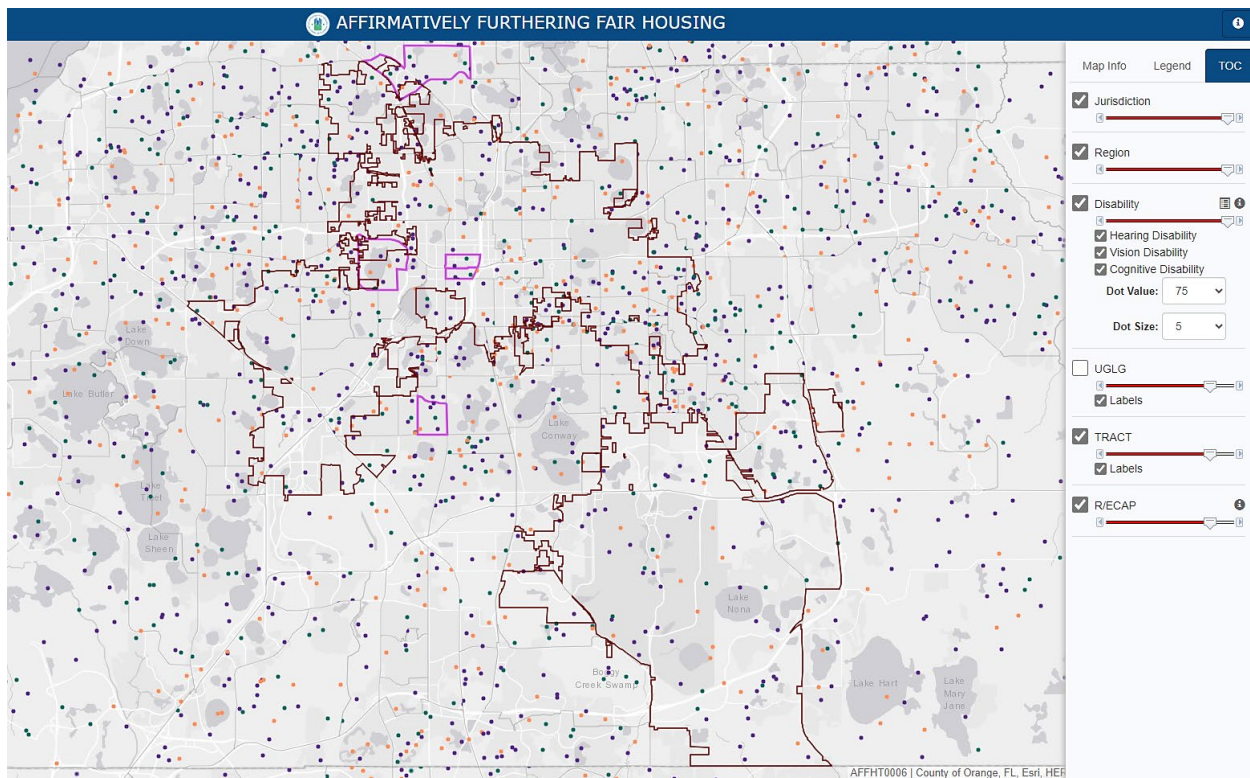
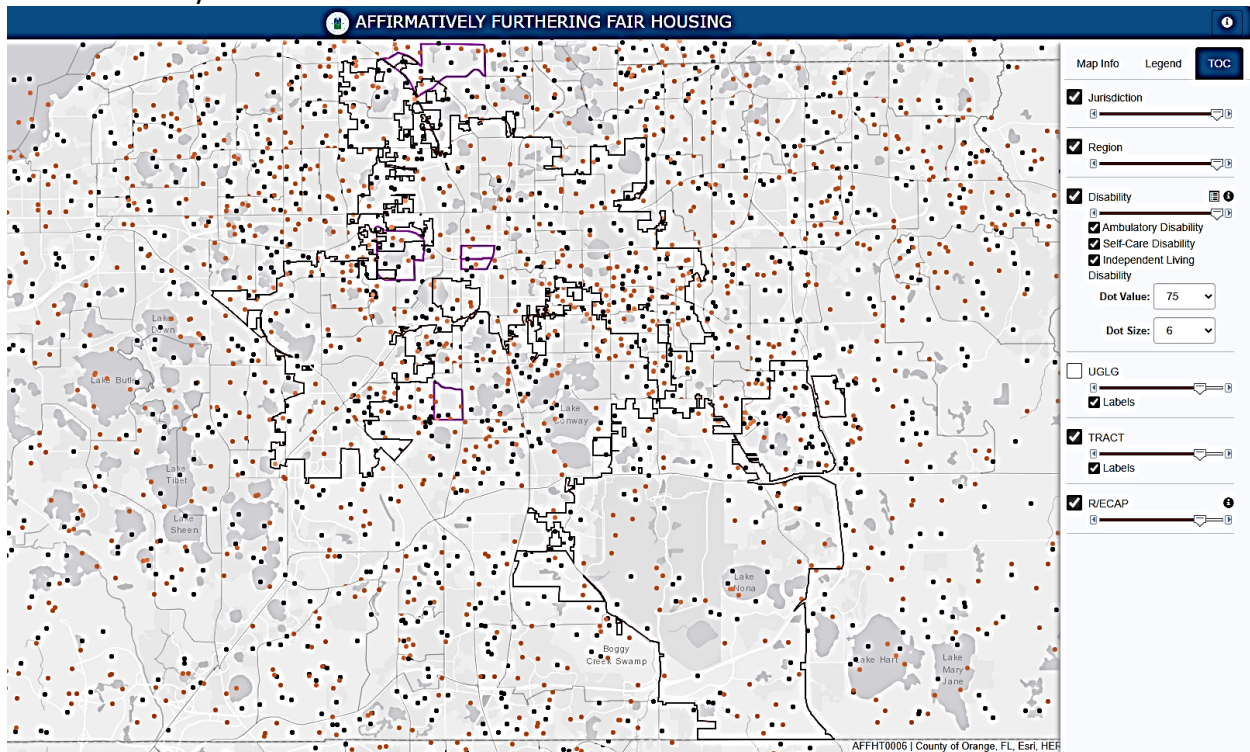
by age – from 4.9% of people under 18 years old, to 7.7% of people 18 to 64 years old, and to 3.2% of those 65 years and over.

HUD provided data on disability type, and disability status by age group. The definition of “disability” used by the Census Bureau may not be comparable to reporting requirements under certain HUD programs, which sometimes use different definitions of disability for purposes of determining eligibility.

The following table shows disability by type. The disability type categories are hearing difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty. Ambulatory difficulty is the most prevalent disability in the jurisdiction as well as in the region. Cognitive difficulty is the second most prevalent disability in both the jurisdiction and the region as well.

Disability by Type Table				
	(Orlando, FL CDBG) Jurisdiction		(Orlando-Kissimmee-Sanford, FL) Region	
Disability Type	#	%	#	%
Hearing difficulty	4,964	2.10%	62,984	2.97%
Vision difficulty	5,208	2.20%	49,554	2.33%
Cognitive difficulty	9,211	3.90%	100,848	4.75%
Ambulatory difficulty	13,084	5.53%	132,540	6.24%
Self-care difficulty	4,039	1.71%	50,537	2.38%
Independent living difficulty	7,848	3.32%	91,983	4.33%
Note 1: All % represent a share of the total population within the jurisdiction or region.				
Note 2: Data Sources: ACS				
Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).				

The maps below show that disabled populations by type do not appear to cluster in any particular area within city limits.

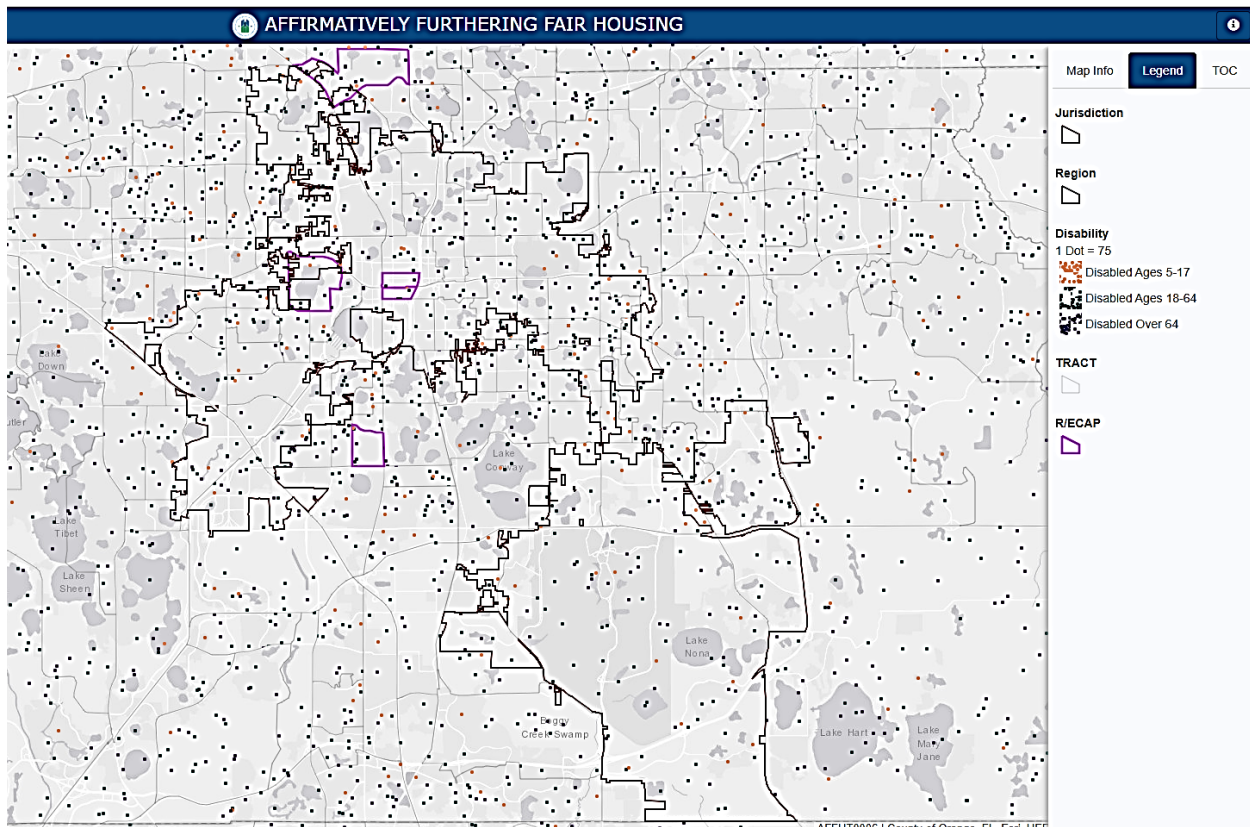


Disability by Age Group Table

	(Orlando, FL CDBG) Jurisdiction		(Orlando-Kissimmee-Sanford, FL) Region	
Age of People with Disabilities	#	%	#	%
age 5-17 with Disabilities	2,573	1.09%	22,261	1.05%
age 18-64 with Disabilities	13,550	5.73%	130,158	6.13%
age 65+ with Disabilities	9,540	4.04%	103,250	4.86%
Note 1: All % represent a share of the total population within the jurisdiction or region.				
Note 2: Data Sources: ACS				
Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).				

The above table shows disability by age group. The age group 18-64 has the highest incidence of disability in the jurisdiction as well as in the region. This is followed by the age group 65+ which is the age group with the second most prevalent disability in both the jurisdiction and the region as well.

The map below shows that disabled populations by age group do not appear to cluster in any particular area within city limits.



In September 2020, Florida Housing Finance Corporation contracted with Corporation for Supportive Housing (CSH) to develop a state-level housing needs assessment designed to identify the supportive and affordable rental housing needs of Special Needs and Homeless populations with incomes at or below 60% of AMI. The Florida Assessment of Housing for Special Needs and Homeless Populations was published during 2021. The Report indicates that there are an estimated 86,206 Special Needs households in Florida in need of either supportive housing or affordable housing. Of that total, 3,880 households (5%) are estimated to need Supportive Housing (SH), while the remaining 82,326 (95%) need Affordable Housing (AH). It would cost \$36.32 billion to develop enough new construction units of Supportive Housing and Affordable Housing to meet the estimated need.

The Report divided Florida into four primary regions: North Florida, Central Florida, Tampa Bay, and South Florida. Central Florida included the following counties: Orange, Osceola, Seminole, Polk, Brevard, and Indian River. The subpopulations examined under the Special Needs Category, as specified by Florida Housing, consist of the following, recognizing that persons with mental illness are dispersed throughout all subpopulations:

- a) Persons with I/DD
- b) Survivors of Domestic Violence

- c) Child Welfare-involved Families with an Adult with Special Needs
- d) Youth Aging out of Foster Care
- e) Individuals and Families Receiving SSDI, SSI, or Veterans Disability Benefits

For purposes of the Analysis of Impediments to Fair Housing Choice only the subpopulations under a, c, and e will be considered. The Report indicates that 3,175 Supportive Housing units for all households with special needs are needed, in the four regions, for Persons with I/DD, and Child Welfare Involved Families with SH Need. Of this total, 18.6% are needed for Central Florida.

For all subpopulations under the Special Needs Category of the Report, a total of 30,100 SH and AH units are needed for individuals and families in Central Florida. Of this total, 93% AH individual and family units are needed, while 7% SH individual and family units are needed. According to the Report, the capital development costs to meet the assessed need for SH and AH entirely through new construction for Florida is \$36,317,465,145, and for Central Florida \$6,694,982,905.

I. Barriers and Impediments to Fair Housing Choice

a. Regulatory Impediments

The Comprehensive Plan, approved during 1991, and amended during 2009, established an agenda for the City of Orlando that will ensure the preservation of its natural and man-made environments, reduce urban sprawl, promote the efficient use of transportation and financial resources, and nurture its human assets.

Orlando has a diversity of housing types and opportunities. The Plan indicated that a range of housing types, locations, and prices, will help maintain Orlando's long-time ethnic, economic, and social diversity. The Plan mentioned the need to make more housing attainable and affordable, while ensuring that the stock of existing homes will be preserved and reutilized. Infill housing was encouraged and supported in order to take advantage of existing infrastructure. Diversification within neighborhoods will be promoted and encouraged through flexible regulation and review procedures. The city recognized that the provision of low-income housing will become more difficult, and that the homeless and economically disadvantaged must be re-incorporated into an economic system that has, by and large, passed them by.

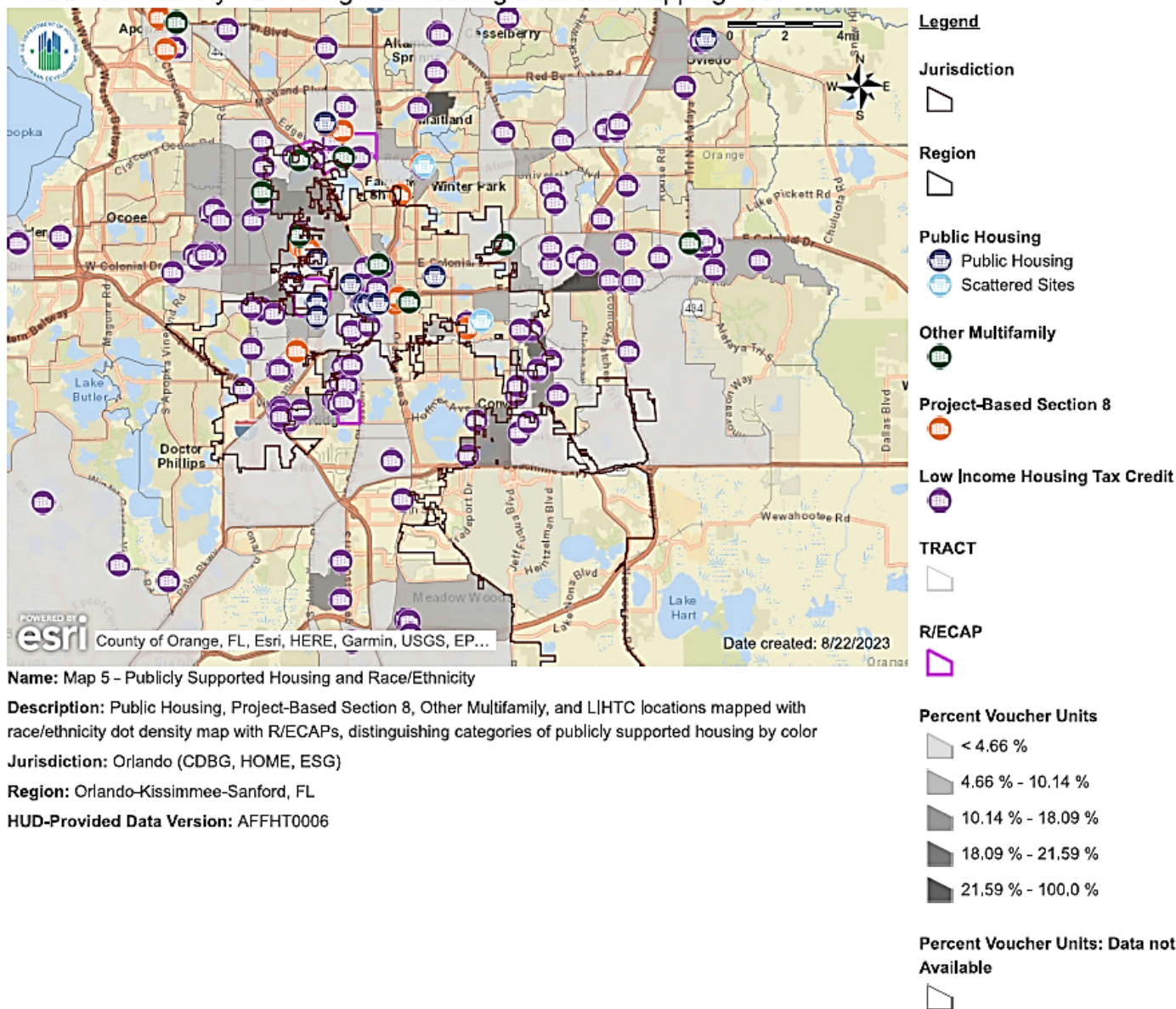
According to the Consolidated Plan, to comply with the Florida Community Planning Act and the Fair Housing Act, the City of Orlando, through public policies and zoning, has made attempts to increase the affordable housing supply. The major changes made in the city's zoning practices have had success, but the new regulations were enacted in 2018 so it is too early to determine the real impact of these changes. For example, since Accessory Dwelling Units (ADU) were implemented throughout the city's residential districts, there has been an increase in the development of these

units. From October of 2016 to September of 2018 (two years), 102 had been developed. Upon passage of the ADU code change, from October 2018 to October 2019, 169 ADU's had been developed. Although the city has created relief to the existing code, additional mechanisms are needed to decrease the affordable housing shortage, as well as de-concentrate low-income minority areas. Orlando with its regional partners will continue discussing regional policy improvements to increase affordable housing options. On-going policy reviews will continue, and each new city-enacted policy will be reviewed based on its impact to housing development and affordability through the Affordable Housing Advisory Committee.

b. Sale or Change of Status of Subsidized Housing

HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) Data Documentation The AFFH-T provides data on households within the following housing categories: Public Housing, Section 8 Project-based Rental Assistance (PBRA), other assisted housing multifamily properties, and Section 8 tenant-based Housing Choice Voucher (HCV) Program. The "Other Multifamily" category includes properties funded through the Section 202 Supportive Housing for the Elderly Program (with both capital advance grants and Project Rental Assistance Contracts) and the Section 811 Supportive Housing for Persons with Disabilities Program. The AFFH-T also provides locational information for Low-Income Housing Tax Credit properties. The following map shows the location of the aforementioned subsidized/assisted units.

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



According to Florida Housing Data Clearinghouse 2023 inventory of assisted properties, there are 29,084 assisted units in the City of Orlando. The source of subsidy includes HUD Multifamily, Florida Housing Finance Corporation, USDA Rural Development, Local Housing Finance Authority and HUD Public Housing. Assisted units serve a range of incomes from extremely low, low, to moderate-income households. The following table shows the Programs with number of units including total number of units dedicated to persons with disabilities:

Subsidized Housing by Program and Number of Disabled Units		
Program	Assisted Units	Total Disabled Units
Florida Housing Finance Corporation	24,786	190
HUD Multifamily	3,485	101
USDA Rural Development	58	N/A
Local Housing Finance Authority	5,724	N/A
HUD Public Housing	1,479	N/A

Source: Florida Housing Data Clearinghouse website. Many properties receive funding from more than one agency, so properties and units may appear in more than one row. "Assisted Units" refers to units with income and rent restrictions. "HUD/RD Rental Assistance Units" refers to units subsidized through project-based rental assistance contracts with HUD or USDA Rural Development.

Lost Inventory

According to the Consolidated Plan, based on the Shimberg Center's Assisted Housing Inventory for 2020, approximately 744 units were expected to be lost from the affordable housing inventory within the next five years. Within the next ten years, another 490 units will no longer carry affordability restrictions. Clearly, losing 1,234 affordable housing units within the next ten years will only worsen an already difficult reality as more people move to Orlando and the demand for affordable housing continues to rise.

VI. FAIR HOUSING GOALS

FAIR HOUSING IMPEDIMENT	CONTRIBUTING FACTOR	GOAL	ACTION STEP
Disproportionate housing need for minority and lower income households	Shortage of Affordable Housing	Increase Affordable Housing Opportunities	<ul style="list-style-type: none"> • Provide financial assistance to affordable housing projects • Explore providing additional incentives to developers of affordable housing
Disproportionate housing need for minority and lower income households	Shortage of Affordable Housing	Maintain or preserve affordable housing units	<ul style="list-style-type: none"> • Continue to fund housing rehabilitation programs to preserve existing housing
Insufficient housing units for disabled persons	Disparities in access to opportunity (see disability section)	Promote more affordable housing for special needs populations	<ul style="list-style-type: none"> • Provide financial assistance to housing development for special needs • Require construction of housing for special needs populations
Higher rate of mortgage loan denials to minorities and lower income households	Patterns in lending; Lack of homebuyer counseling and education	Educate potential homebuyers	<ul style="list-style-type: none"> • Incorporate into the homebuyer classes a fair housing component • Provide HUD-approved fair housing training to DPA participating banks. • Promote financial literacy to low-income residents
Segregation	Data show higher segregation value when compared to the region	Increase the provision of affordable housing outside RECAPS	<ul style="list-style-type: none"> • Continue to participate in community leadership homeownership initiatives. • Continue to implement zoning/land use changes favorable to the construction of affordable housing.
Disparities in Access to Opportunity	When compared to the region – city residents with higher exposure to poverty; minorities (Black residents)	<ul style="list-style-type: none"> • Increase homeownership opportunities to minorities in high 	<ul style="list-style-type: none"> • Continue to participate in community leadership

FAIR HOUSING IMPEDIMENT	CONTRIBUTING FACTOR	GOAL	ACTION STEP
	with lowest level to access to quality schools; and minorities (Black residents) show the lowest labor participation.	labor market areas and quality schools. <ul style="list-style-type: none"> • Increase fair housing training in areas with higher rates of marginalized populations. 	homeownership initiatives. <ul style="list-style-type: none"> • Explore providing additional incentives to developers to build affordable housing in high quality areas. • Explore providing incentives for businesses to invest in lower income areas. • City's OHR developing 2025 outreach plan to include fair housing training to areas with higher rates of marginalized populations.
Disproportionate housing needs for renters	Renters experiencing severe cost burden	Expand the construction of affordable rental developments	<ul style="list-style-type: none"> • Provide financial assistance to rental developments. • Advocate increase funding for rental assistance.
Insufficient knowledge of fair housing laws covering families with children and persons with disabilities	Result of resident and organization surveys, and legal cases filed	Increase the provision of fair housing trainings.	<ul style="list-style-type: none"> • Continue to encourage the provision of fair housing citywide training.

VII. ASSESSMENT OF PAST GOALS

Public Sector Impediments	Recommendations	Progress								
Attitudes of the General Public: NIMBYism										
There is a lack of awareness of Fair Housing Choice and the impact of NIMBYism on mixed-income development.	Hold regular education sessions for City Planning Boards regarding Fair Housing Choice, the consequences of disparate impact, and the economic and social benefits of mixed-income development.	On February 24, 2024, the City of Orlando Office of Human Relations held the Fair Housing Fair as an opportunity for the community to learn more about fair housing protections provided by the city’s Chapter 57.								
		On February 17, 2023, the City of Orlando held the Fair Housing Education and Outreach Fair.								
		During April 2, 2020, the city held a Civil Rights Ceremony followed on April 3, 2020, with a Fair Housing Training.								
		On April 12, 2018, the city celebrated the 50 th Anniversary of the Fair Housing Act. This event reaffirmed the city’s continued commitment to advancing fair housing and crating stable, inclusive neighborhood that encourage the contributions of citizens. The City Mayor, two City Commissioners, and former State Senator were present.								
		During 2020 and 2021, many meetings were cancelled due to the pandemic.								
		The Chapter 57 Review Board hears appeals of Chapter 57 and HUD housing complaint determinations as well as appeals from denials of minority and women-owned business certification. The Chapter 57 Review Board met the following dates:								
		<table><tr><td>2/23/20</td><td>2/10/22</td></tr><tr><td>1/14/21</td><td>12/08/22</td></tr><tr><td>2/11/21</td><td>2/9/23</td></tr><tr><td>10/14/21</td><td>3/9/23</td></tr></table>	2/23/20	2/10/22	1/14/21	12/08/22	2/11/21	2/9/23	10/14/21	3/9/23
2/23/20	2/10/22									
1/14/21	12/08/22									
2/11/21	2/9/23									
10/14/21	3/9/23									
Development Regulations and Land Costs										
Research into regional zoning policies indicates a neutral impact on de-concentrating minority areas of poverty.	Deliberate policies are needed to exert a positive impact on de-concentrating these areas, which may include: inclusionary zoning, greater flexibility on accessible dwelling units, alternative design standards for all affordable	During program year 2022, Housing and Community Development Department staff actively participated in the review of proposed amendments to the city’s land use policies that would have a negative impact on affordable housing. All proposed increases to existing impact fees, building permit application and inspection fees, and requirements related to the development review process were flagged and evaluated and then submitted to the Affordable Housing Advisory Committee (AHAC) for review and recommendations. As a result, any passed ordinance or fee increasing the cost on housing production does provide options for those developing affordable housing. Options includes waivers or discounts in fees, or relaxed development requirements. In addition, the city’s Intergovernmental Coordinator works closely with congressional lobbyist in educating elected officials, constitutional officers and legislative leaders on the effects proposed legislation will have on local jurisdictions efforts in the								

Public Sector Impediments	Recommendations	Progress
	<p>housing development (including multi-family developments), and implementation of a regional community land trust.</p>	<p>production and preservation of affordable housing.</p> <p>During 2018, Orlando adopted a series of “Missing Middle” Land Development Code (LDC) amendments designed to make it easier to build on small lots by reducing parking standards and allowing more site planning flexibility for Townhomes, Duplex & Tandem Single Family, Multiplex, and Accessory Dwelling Units (ADUs). ADUs are commonly known as an in-law suite, garage apartment, or granny flat. An ADU is a separate living unit on the same lot as a single-family home. ADUs can be built attached or detached to your home and have independent access.</p> <p>The Florida 2019 Legislative Session produced House Bill 7103, which changed how cities and counties in Florida can develop and implement inclusionary zoning (IZ) ordinances. House Bill 7103 became law on July 1, 2019, and in part, amended Florida’s inclusionary zoning statutes for counties and municipalities. The new statutory language explicitly allows cities and counties to implement mandatory inclusionary zoning ordinance. In exchange, the new law requires local governments to provide incentives to “fully offset all costs” to the developer as a result of the affordable housing requirement. Local government can do so by providing incentives such as a density or intensity bonus, reducing or waiving fees, or by granting other incentives. Local government can also offset costs by granting an up-zoning that raises the value of the developer’s property. The City of Orlando provides affordable housing development incentives such as reduced or waived impact fees, density bonus, alternative development standards, and expedited permitting to increase the supply of affordable housing in the city.</p> <p>The Live Local Act is a comprehensive, statewide workforce housing strategy, designed to increase the availability of affordable housing opportunities for Florida’s workforce, who desire to live within the communities they serve. This Act, also known as SB 102, provides historic funding for workforce housing. In addition to a multitude of new programs, incentives, and opportunities, this legislation works to refocus Florida’s housing strategy in ways that make housing more attainable.</p>
<p>John P. Relman at the HUD National Fair Housing Training and Policy Conference held on September 1, 2015, mentions disparate impact as a result of nuisance ordinances. He cites the article <i>“Unpolicing the Urban Poor: Consequences of Third-Party Policing for Inner-City Women”</i> by Mathew Desmond and Nicol Valdez in an issue of the</p>	<p>Track public nuisance complaints to verify whether the above occurs in the City/County. If so, review ordinance to</p>	<p>The City of Orlando adopted, during 2008, an Ordinance creating the Criminal Nuisance Abatement Board. The Board oversees hearing complaints regarding public nuisances as described in subsection (1) of the Ordinance. Subsection (1) does not include residential premises. Additionally, during 2019 the Orlando Police Department Policy and Procedure distribute to all its employees a policy describing the procedures to be used to abate criminal nuisances. A criminal nuisance was defined as a piece of real property, like a convenience store, abandoned lot, or motel, where certain types of criminal or gang activity occur. Oftentimes, there must be three arrests for the same type of criminal activity on</p>

Public Sector Impediments	Recommendations	Progress
American Sociological Review, 2012. In this review, the authors demonstrate that properties in heavily African-American and in transitional neighborhoods are disproportionately deemed “nuisances”. The vast majority of nuisance incidents involve domestic violence, and that given eviction is the preferred method of abating nuisance, African American women are disproportionately affected.	recommend mitigating factors.	a property within a six-month period for the property to be a criminal nuisance. Domestic violence is not included as a criminal nuisance. Staff reviewed the ordinance and determined that the Nuisance adopted during 2008 does not target domestic violence incidents as nuisance incidents.
Data shows minority poverty concentrations in the school system.	Include school system in discussions regarding a regional approach to de-concentrating poverty areas.	<p>The Future Land Use Element of the City of Orlando Growth Management Plan includes the following policy:</p> <p>Policy 5.4.18 - The city shall support partnerships with the Orange County School Board to improve school choice downtown, including the development of at least one elementary school in the Parramore Heritage area. The city shall support the development of charter elementary schools, including pre-kindergarten classes, particularly in the Parramore Heritage area.</p> <p>Additionally, a member of the Orange County School Board sits in the City’s Technical Review Committee to review applications related to planning and zoning matters.</p> <p>In 2023, Bezos Academy opened a preschool in the City of Orlando on Mercy Drive. Bezos Academy is building a network of tuition-free, Montessori-inspired preschools in under-resourced communities.</p> <p>During 2016 philanthropist Harris Rosen started efforts to bring college scholarships and preschool programs to the Parramore neighborhood, a predominantly African American neighborhood. During the first half of the 20th century Black residents were forced to give up their homes and move into public housing because of segregation.</p>
Fair Housing Enforcement, Education and Advocacy		
Community-based organizations mentioned a lack of in-depth knowledge regarding the Fair Housing Act and Fair Housing Choice.	Create a Fair Housing Guide to distribute to our partner organizations to inform their clientele about their Fair Housing rights.	The City of Orlando Office of Human Relations has put together a pamphlet titled “Fair Housing Training Guide” which provides information on the protected classes, types of housing covered by fair housing laws, practices prohibited by fair housing laws, tips for reporting housing discrimination, and how to file a complaint. In addition, this information is also posted in their website.

Public Sector Impediments	Recommendations	Progress
Other Public Sector Improvements		
There is a severe shortage of affordable housing, which impacts Fair Housing Choice.	Additional public/private partnerships are needed to develop mixed-income housing throughout the city, including areas of opportunity.	<p>The city has continued to take actions to increase the supply of affordable housing through the implementation of public policies that stimulate development of affordable units. Such actions include implementing the following policies: Reduced or Waived Impact Fees – reduces or waives transportation and park impact fees to certified affordable housing developments; Density Bonus – the city provides a density bonus program opportunity for many of the city’s zoning districts to receive additional density or intensity by providing on-site affordable units in conjunction with another approved use; Alternative Development Standards – residential developments with at least ten contiguous dwelling units and a unit mix consisting of at least 20% of low- and very-low-income units are eligible to apply for alternative development standards, subject to building site and a neighborhood compatibility standards; and Expedited Permitting – certified projects are reviewed before market-rate projects, resulting in shorter review times.</p> <p>In the last five years, the city has invested or committed more than \$40 million to create or preserve housing options for residents at all income levels. This includes the construction or rehabilitation of more than 1,600 multifamily units and the construction of more than 150 new residences (single family residences and duplexes) that provide homeownership opportunities for residents interested in pursuing the American dream of homeownership. One significant example of the city’s strategy was in 2015 when the city invested nearly \$7 million to purchase seven vacant, foreclosed, uninhabitable properties in the greater Washington Shores and Mercy Drive areas, with a goal to transform these sites into safe, attractive affordable housing for city residents. Along with private and non-profit partners, one-by-one these blighted sites have been transformed into vibrant new communities that any resident would be proud to call home. These new developments include:</p> <ul style="list-style-type: none"> • Village of Mercy, a \$28 million 166-unit affordable apartment community developed by Ability Housing. • Pendana at West Lakes, a \$40 million 200-unit mixed income M/F community • Pendana at West Lakes Senior Residences, a 23.5 million development with 120-unit affordable apartment homes designed for seniors. Both Pendana properties were developed by LIFT Orlando. • Fairlawn Village, a 116-unit affordable apartment complex developed by Blue CASL Orlando. <p>In 2022 the city provided funding to BDG Fern Grove, LP to develop a one hundred and thirty-eight (138) unit senior affordable housing development. The project is expected to complete construction during Fall of 2024.</p>

Private Sector Impediments	Recommendations	Progress
Lending		
<p>Data shows minorities as underrepresented in application for conventional home purchase loans.</p> <p>Minority households who may wish to purchase homes in or near central city neighborhoods have limited choices in new or renovated housing stock.</p> <p>There are significantly higher loan denial rates for Black and minority residents than for White residents in the City of Orlando.</p>	<p>Create dialog with top financial institutions regarding loan denial and access in minority/poverty areas to traditional banking.</p>	<p>State and federally funded grants are available to very low-, low-, and moderate-income households through city-registered mortgage lenders for homes purchased within city limits. Priority is given to very low- and low-income households.</p> <p>The Housing and Community Development Department is in contact with lending institutions to assist with the implementation of the Down Payment Assistance Program. Lenders are invited to become a city-registered mortgage lender to assist those homebuyers who are in need of down payment assistance. The majority of these homebuyers are lower income minority households.</p> <p>During 2023 the City of Orlando started participating in the Bright Community Trust initiative to house 5,000 new homeowners of color over 5 years through 2028 in the central area of Florida. The Homeownership Equity Initiative proposes to bridge the homeownership gap for people of color in Central Florida.</p>
Credit		
<p>A poor credit history is the number one reason for disapproval of home loan applications.</p> <p>A borrower's credit history weighs heavily in loan decisions made by automated underwriting systems.</p> <p>It is difficult for people to overcome past credit problems and become homeowners.</p>	<p>Discuss alternatives to traditional credit history requirements with top lending institution.</p> <p>Promote pilot programs that use alternatives to traditional underwriting systems.</p>	<p>The Down Payment Assistance (DPA) Program provides assistance to qualified first-time homebuyers for the down payment and closing costs associated with purchasing a home. Before a person can apply for the Down Payment Assistance Program, they will be required to attend a pre-purchase homebuyer education workshop with a housing counseling agency approved by the U.S. Department of Housing and Urban Development (HUD). While eligibility to DPA is based on income, a lack of credit history or bad credit can be a barrier to homeownership. Taking the prepurchase education workshop assists homebuyers to place themselves in a better position to secure a mortgage.</p> <p>The city program requires the home to be located within city limits. The amount of eligible assistance is based on gross household income and need. All applicants must secure a first mortgage from a city-registered mortgage lender.</p> <p>During 2024, the City of Orlando participated in the FreddieMac DPA One Demonstration Program meeting. FreddieMac believes that down payment assistance is a barrier to homeownership. DPA One will deliver a centralized resource tool that brings together DPA program providers and housing professionals to successfully manage and match down payment assistance programs nationwide.</p>

Private Sector Impediments	Recommendations	Progress
		The city has been providing CDBG funding for the last years to Housing and Neighborhood Development Services of Central Florida (HANDS) to provide homebuyer education seminars and one-on-one pre-purchase counseling to lower income households. During FY 2022-23 the agency provided housing counseling to 71 lower income households.
Real Estate Industry		
Realtors sometime steer minority and low-income buyers to lenders with whom they have a relationship, despite the fact that this may not be the best for the buyers. There is a lack of affordable housing.	Testing on steering needs to continue. The city needs to work with the real estate foundation and other professionals to market and promote mixed-income development and access.	Florida realtors have a website which offers information on fair housing laws. Additionally, realtors can take a course concerning Florida Fair Housing law.
Rental Housing		
Rental housing has increasingly become unaffordable for low and very low-income renters	The city needs to include strategies to provide fair housing education and information to landlords, including creating a Fair Housing Guide.	The creation of the guide has been discussed under the Fair Housing Enforcement, Education and Advocacy Section. The Office of Human Relations is a certified agent of both the U. S. Equal Employment Opportunity Commission (EEOC) and the U.S. Department of Housing and Urban Development (HUD) . Among the services provided is the following: Conducts free training workshops for employers, housing providers and individuals/entities involved in the business of providing access to places of public accommodation. Discussions are general or customized per request; covering topics such as best practices, the basics of existing laws, new amendments to existing laws and new laws and how they affect you.
Criminal Backgrounds		
Besides educating landlords and other housing stakeholders regarding disparate treatment and impact within protected classes, a discussion surrounding criminal backgrounds and their impact on Fair Housing choice should be expanded. According to the U.S. Bureau of Justice Statistics, the chance for an African American male going to prison is 1 in 3; for Hispanic men it is 1 in 6; and for White men	John P. Relman at the HUD National Fair Housing Training and Policy Conference held on September 1, 2015, recommended including as part of landlord education and tenant policies regarding	According to the Federal Trade Commission Consumer Advice landlords can check an applicant's credit, criminal history, and rental history. According to HUD the Fair Housing Act prohibits discrimination in the sale, rental, or financing of dwellings and in other housing-related activities on the basis of race, color, religion sex, disability, familial status or national origin. While having a criminal record is not a protected characteristic under the Fair Housing Act, criminal history-based restrictions on housing opportunities violate the Act if, without justification, their burden falls more often on renter or other housing market participants of one race or national origin over another. Additionally, intentional discrimination in violation of the Act

Private Sector Impediments	Recommendations	Progress
<p>1 in 17. In <i>The New Jim Crow</i>, Michelle Alexander states:</p> <p><i>“African Americans are not significantly more likely to use or sell prohibited drugs than Whites, but they are made criminals at drastically higher rates for precisely the same conduct. In fact, studies suggest that White professionals may be the most likely of any group to have engaged in illegal drug activity in their lifetime, yet they are the least likely to be made criminals”.</i></p>	<p>criminal backgrounds the following:</p> <ul style="list-style-type: none"> • Move from a blanket ban to an individualized review • Focus on the requirements of tenancy versus individual’s past conduct • Examine mitigating factors, such as: nature of offense, time of offense, tenant requirements 	<p>occurs if a housing provider treats individuals with comparable criminal history differently because of their protected class status. Florida does not allow for a blanket policy that immediately rejects all applicants with some form of a criminal record history. However, Florida does not restrict the usage of criminal records as they are public records unless the record has received an order to be sealed.</p> <p>According to the Federal Trade Commission Background screening reports are “consumer reports” under the FCRA when they serve as a factor in determining a person’s eligibility for housing, employment, credit, insurance, or other purposes and they include information “bearing on a consumer’s credit worthiness, credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living.” If the landlord uses a company construed to be a consumer reporting agency, the law requires the following:</p> <ul style="list-style-type: none"> • <i>Follow reasonable procedures to assure accuracy</i> • <i>Get certifications from your clients</i> • <i>Provide your clients with information about the Fair Credit Reporting Act</i> • <i>Honor the rights of applicants and tenants</i>

VIII. APPENDICES

APPENDIX 1 – Resident Survey Response and Data Analysis

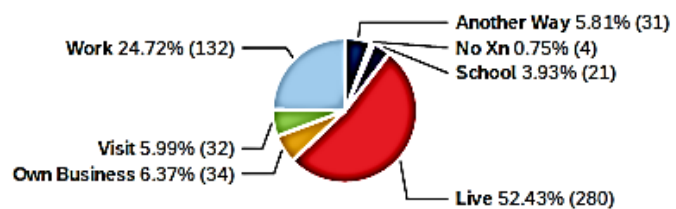
Demographics

Orlando Connection

Orlando Connection 313

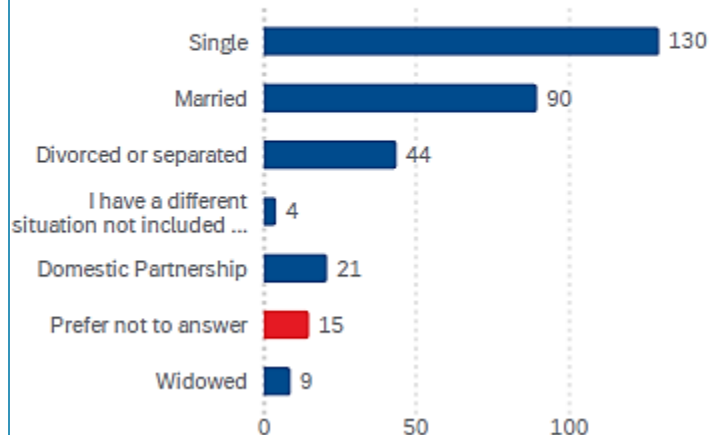
Survey Question: What is your connection to the City of Orlando?
You can choose as many options as you need.

- I work here.
- I live here.
- I visit here often.
- I own a business here.
- I go to school here.
- I do not have a connection to Orlando.
- I am connected to Orlando in another way.



Marital Status

Write-In: Marital Status 4



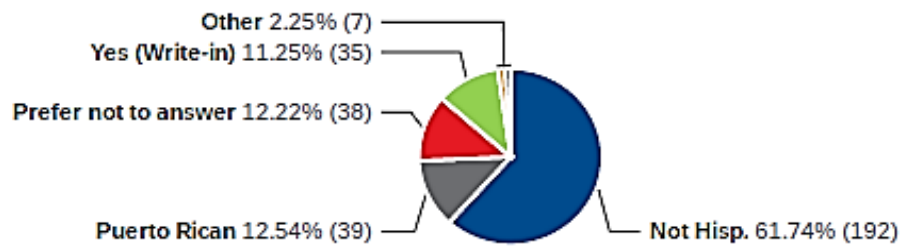
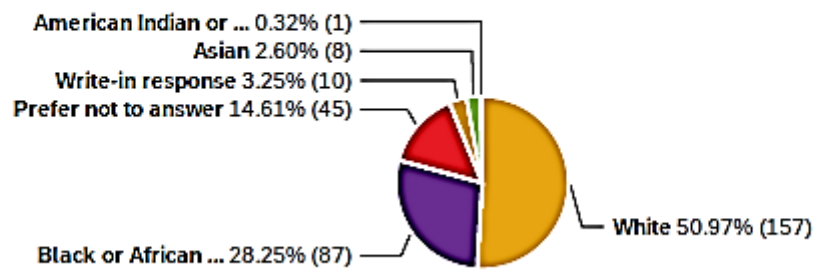
I have a different situation not included here.

Separada

Engaged

Engaged

Single With Two Daughter's

Hispanic Ethnicity 311**Race** 308

Resident: Housing Knowledge

Understand how knowledgeable residents feel about housing laws

Individual

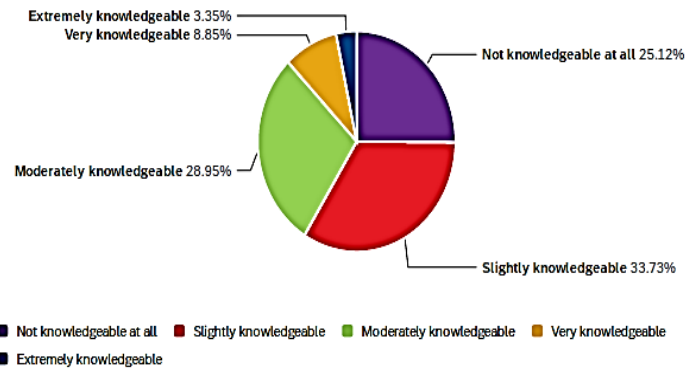
Knowledge

How knowledgeable are **you** about fair housing laws?

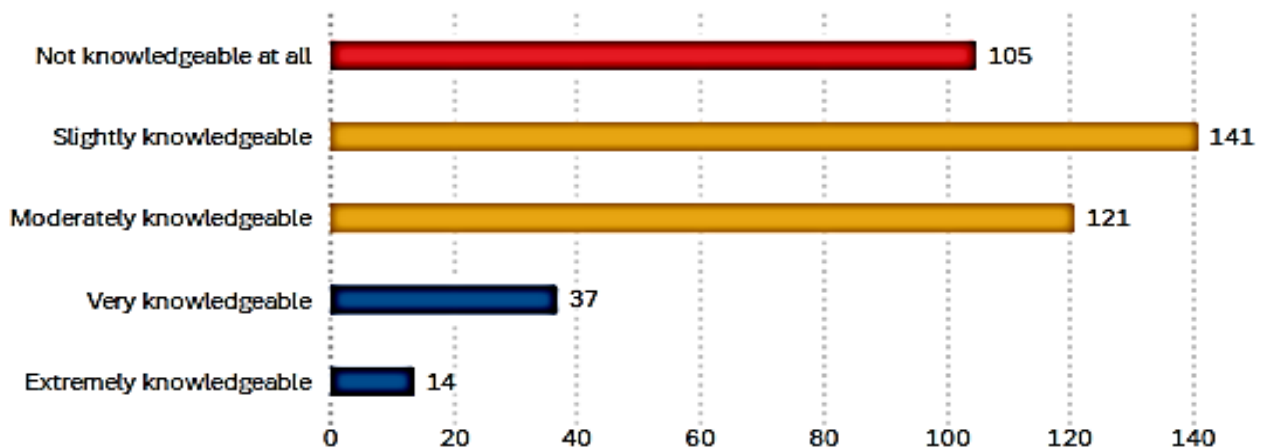
- Not knowledgeable at all
- Slightly knowledgeable
- Moderately knowledgeable
- Very knowledgeable
- Extremely knowledgeable

Num. Responses
418

Knowledge Levels by Percentage 418



Breakdown of Responses 418



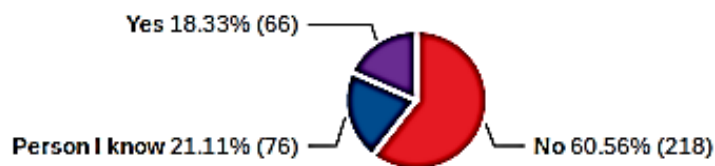
Housing Knowledge by Income Levels 309

What is your annual household income?	Not knowledgeable at all		Slightly knowledgeable		Moderately knowledgeable		Very knowledgeable		Extremely knowledgeable	
	%	Count	%	Count	%	Count	%	Count	%	Count
Less than \$19,999	22.95%	14	29.51%	18	36.07%	22	9.84%	6	1.64%	1
\$20,000 - \$39,999	34.00%	17	30.00%	15	28.00%	14	8.00%	4	0.00%	-
\$40,000 - \$59,999	31.25%	15	27.08%	13	33.33%	16	8.33%	4	0.00%	-
\$60,000 - \$79,999	2.56%	1	41.03%	16	48.72%	19	5.13%	2	2.56%	1
\$80,000 - \$99,999	43.75%	7	37.50%	6	0.00%	-	12.50%	2	6.25%	1
\$100,000 or more	18.33%	11	31.67%	19	36.67%	22	8.33%	5	5.00%	3
Prefer not to answer	20.00%	7	42.86%	15	20.00%	7	5.71%	2	11.43%	4

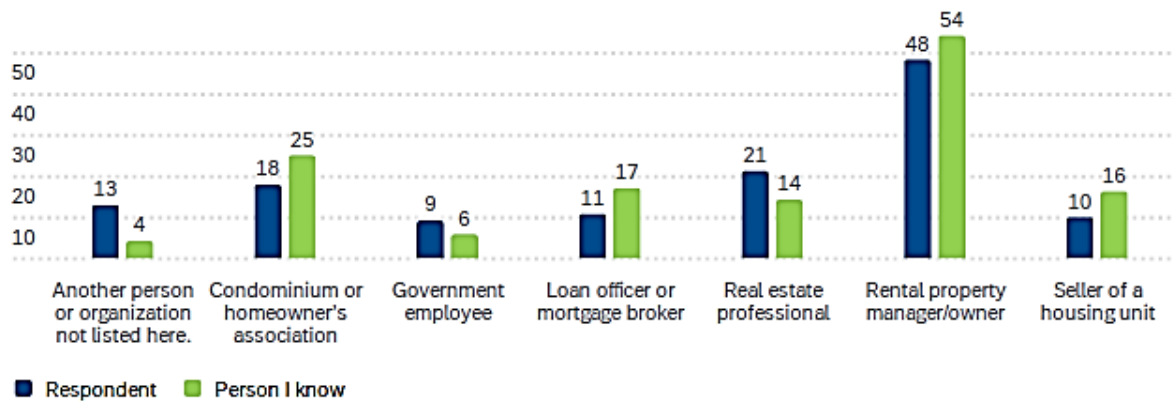
Resident: Discrimination Experiences

Understand respondents' experiences with housing discrimination

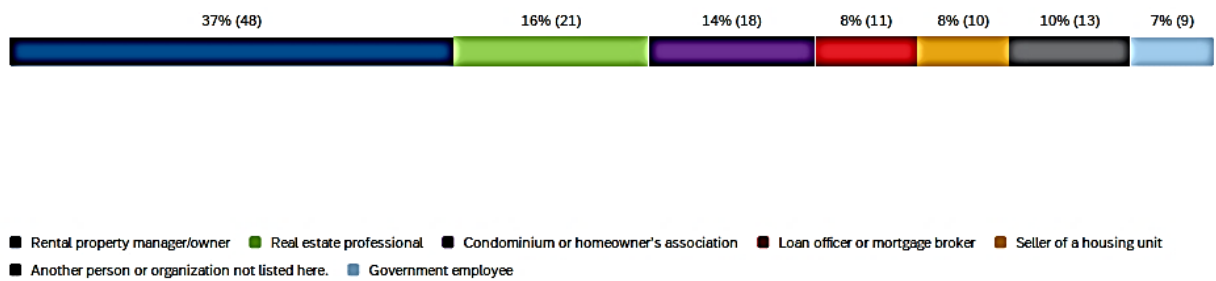
Experienced Discrimination? 360



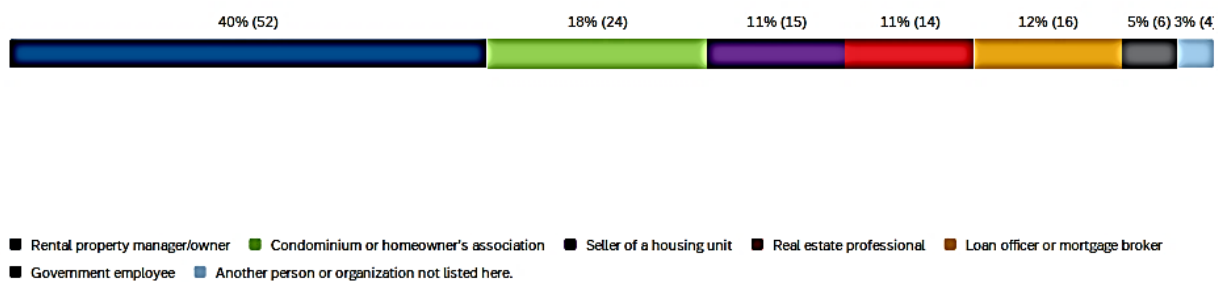
Discriminatory Organization or Person 134



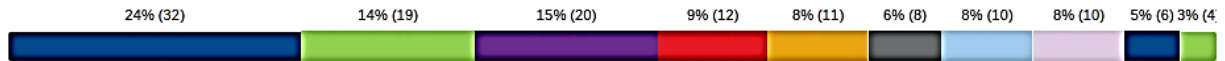
Discriminatory Organization or Person for Respondents 64



Discriminatory Organization or Person for Person I Know 68

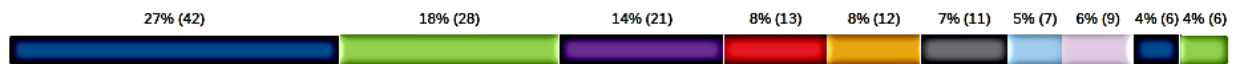


Perceived Reason for Discrimination against Respondents 62



■ Race ■ Another reason not listed here: ■ Color ■ Marital Status ■ Familial Status (household includes one or more persons under 18 years of age) ■ Sex
 ■ Disability (includes mental or physical impairments that substantially limit one or more major life activities) ■ National Origin (includes country of birth and country of ancestry)
 ■ Sexual Orientation ■ Religion

Perceived Reason for Discrimination against Person I Know 69



■ Race ■ Color ■ Sexual Orientation ■ Sex ■ National Origin (includes country of birth and country of ancestry)
 ■ Disability (includes mental or physical impairments that substantially limit one or more major life activities) ■ Religion
 ■ Familial Status (household includes one or more persons under 18 years of age) ■ Marital Status ■ Another reason not listed here:

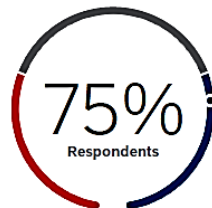
Resident: Housing Opinions

Understand respondents' overall perceptions of housing in Orlando

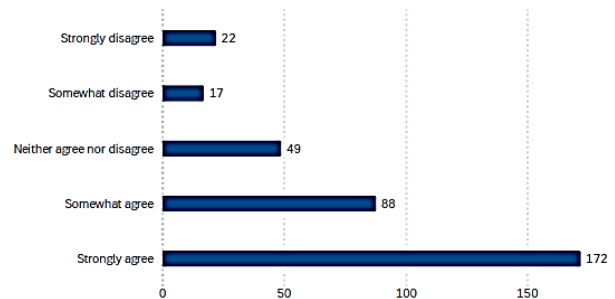
Affordable housing choices are limited to certain areas or neighborhoods in the City of Orlando.

- Strongly disagree
- Somewhat disagree
- Neither agree nor disagree
- Somewhat agree
- Strongly agree

Somewhat or Strongly Agree
348



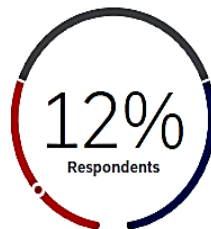
Breakdown of Responses 348



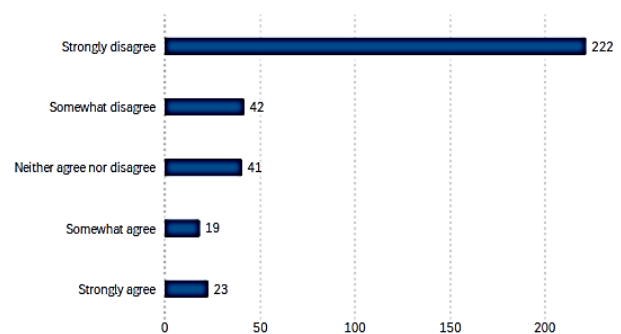
There is an adequate supply of affordable housing in the City of Orlando.

- Strongly disagree
- Somewhat disagree
- Neither agree nor disagree
- Somewhat agree
- Strongly agree

Somewhat or Strongly Agree
347



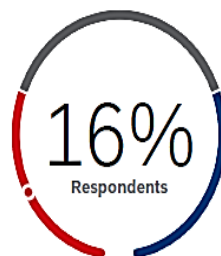
Breakdown of Responses 347



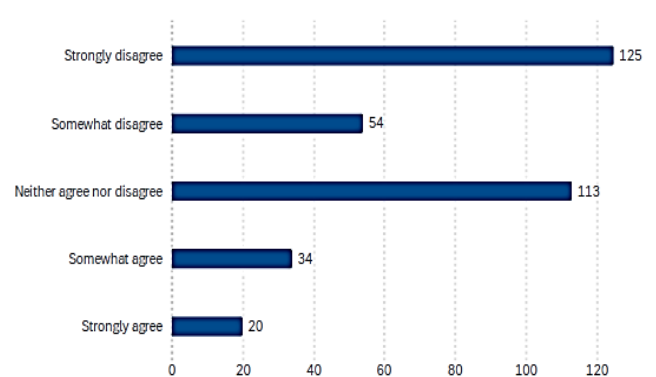
There is an adequate supply of housing that is accessible to people with disabilities in the City of Orlando.

- Strongly disagree
- Somewhat disagree
- Neither agree nor disagree
- Somewhat agree
- Strongly agree

Somewhat or Strongly Agree
346



Breakdown of Responses 346



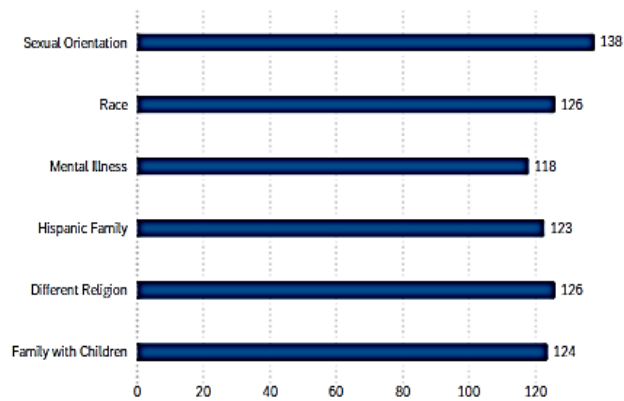
Issues Ranked by Percentage of "Significantly" Responses		Issues Ranked by Percentage of "Moderately" Responses		Issues Ranked by Percentage of "Slightly" Responses	
Housing Issue	% Responses for "Significantly"	Housing Issue	% Responses for "Moderately"	Housing Issue	% Responses for "Slightly"
Cost of rent/mortgage in a preferred neighborhood	76%	Size of available apartments/houses too small or too large	32%	Environmental dangers (e.g., lead-based paint, asbestos, landfill)	20%
Poor credit history or low credit score	57%	Not enough nearby places that provide services (e.g., schools, public transit, medical services, shopping centers)	30%	Concern that someone would not be welcome in the neighborhood	17%
Crime in the area	50%	Crime in the area	27%	Not enough infrastructure (e.g., water/sewer connection, roadways, broadband)	15%
Not enough units that accommodate a disability (e.g., wheelchair-accessible, supportive housing)	32%	Concern that someone would not be welcome in the neighborhood	25%	Not enough nearby places that provide services (e.g., schools, public transit, medical services, shopping centers)	14%
Not enough nearby places that provide services (e.g., schools, public transit, medical services, shopping centers)	31%	Not enough units that accommodate a disability (e.g., wheelchair-accessible, supportive housing)	23%	Size of available apartments/houses too small or too large	14%
Size of available apartments/houses too small or too large	28%	Not enough infrastructure (e.g., water/sewer connection, roadways, broadband)	22%	Not enough units that accommodate a disability (e.g., wheelchair-accessible, supportive housing)	11%
Concern that someone would not be welcome in the neighborhood	24%	Environmental dangers (e.g., lead-based paint, asbestos, landfill)	18%	Crime in the area	7%
Not enough infrastructure (e.g., water/sewer connection, roadways, broadband)	23%	Poor credit history or low credit score	15%	Poor credit history or low credit score	5%
Environmental dangers (e.g., lead-based paint, asbestos, landfill)	18%	Cost of rent/mortgage in a preferred neighborhood	9%	Cost of rent/mortgage in a preferred neighborhood	3%

Issues' Restriction on Housing 323						
Housing Issues	Not at all	Slightly	Moderately	Significantly	Don't know/not sure	Total Responses
Cost of rent/mortgage in a preferred neighborhood	15	8	28	244	25	320
Poor credit history or low credit score	26	16	48	182	47	319
Crime in the area	15	23	83	158	33	312
Not enough units that accommodate a disability (e.g., wheelchair-accessible...	26	34	73	100	87	320
Not enough nearby places that provide services (e.g., schools, public trans...	43	44	95	97	39	318
Size of available apartments/houses too small or too large	35	43	103	89	48	318
Concern that someone would not be welcome in the neighborhood	47	55	80	76	58	316
Not enough infrastructure (e.g., water/sewer connection, roadways, broadband...	56	47	69	73	74	319
Environmental dangers (e.g., lead-based paint, asbestos, landfill)	44	64	57	57	97	319

Resident: Housing Scenarios Opinions

Understand what residents think is ok in different scenarios
"Regardless of what the law says..."

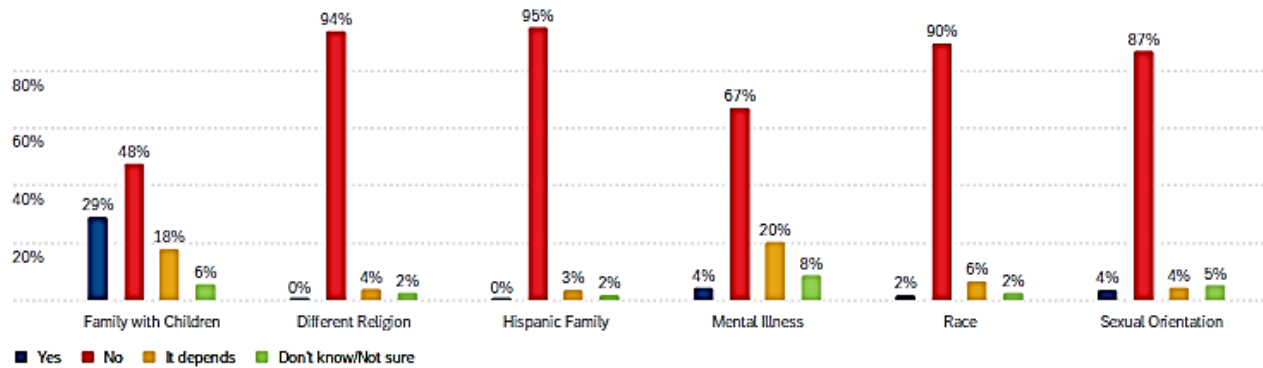
Num. Responses per Question 389



Num. Responses by Scenario 389

Opin	Yes	No	Don't know/Not sure	It depends	Total
Families with Small Children	36	59	7	22	124
Different Religion	0	118	3	5	126
Hispanic Family	0	117	2	4	123
Mental Illness	5	79	10	24	118
Race	2	113	3	8	126
Sexual Orientation	5	120	7	6	138

Respondent Opinions by Scenario 389

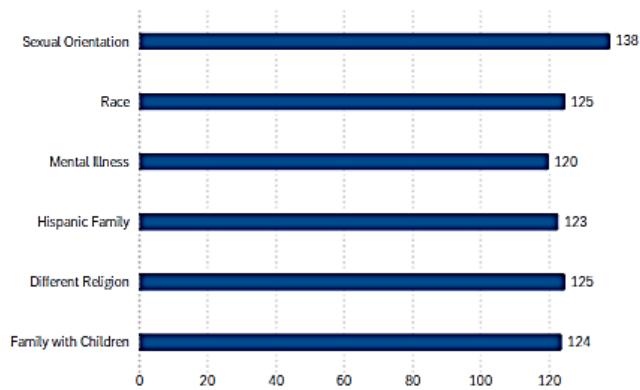


Resident: Housing Scenarios Federal Law Question

Understand what residents think is legal according to federal law

"Under federal law, is it currently legal..."

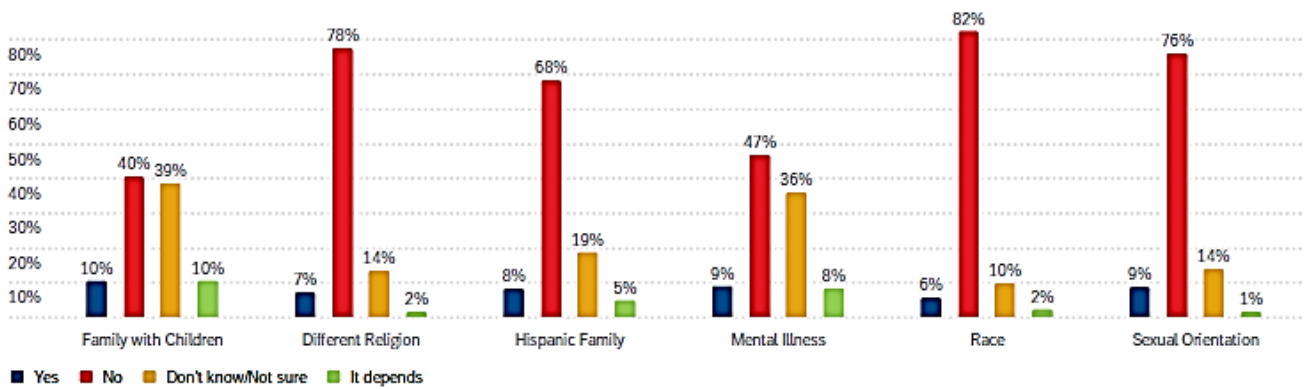
Num. Responses per Question 388



Num. Responses by Scenario 388

FedLaw	Yes	No	It depends	Don't know/Not sure	Total
Family with Children	13	50	13	48	124
Different Religion	9	97	2	17	125
Hispanic Family	10	84	6	23	123
Mental Illness	11	56	10	43	120
Race	7	103	3	12	125
Sexual Orientation	12	105	2	19	138

Respondent Opinions by Scenario 388



Resident: Housing Issues

Understand respondents' perceptions of what restricts housing in Orlando

Issues Ranked by Percentage of "Significantly" Responses		Issues Ranked by Percentage of "Moderately" Responses		Issues Ranked by Percentage of "Slightly" Responses	
Housing Issue	% Responses for "Significantly"	Housing Issue	% Responses for "Moderately"	Housing Issue	% Responses for "Slightly"
Cost of rent/mortgage in a preferred neighborhood	77%	Size of available apartments/houses too small or too large	32%	Environmental dangers (e.g., lead-based paint, asbestos, landfill)	20%
Poor credit history or low credit score	58%	Not enough nearby places that provide services (e.g., schools, public transit, medical services, shopping centers)	30%	Concern that someone would not be welcome in the neighborhood	17%
Crime in the area	51%	Crime in the area	27%	Not enough infrastructure (e.g., water/sewer connection, roadways, broadband)	15%
Not enough units that accommodate a disability (e.g., wheelchair-accessible, supportive housing)	32%	Concern that someone would not be welcome in the neighborhood	25%	Not enough nearby places that provide services (e.g., schools, public transit, medical services, shopping centers)	14%
Not enough nearby places that provide services (e.g., schools, public transit, medical services, shopping centers)	30%	Not enough infrastructure (e.g., water/sewer connection, roadways, broadband)	22%	Size of available apartments/houses too small or too large	14%
Size of available apartments/houses too small or too large	28%	Not enough units that accommodate a disability (e.g., wheelchair-accessible, supportive housing)	22%	Not enough units that accommodate a disability (e.g., wheelchair-accessible, supportive housing)	11%
Concern that someone would not be welcome in the neighborhood	25%	Environmental dangers (e.g., lead-based paint, asbestos, landfill)	18%	Crime in the area	8%
Not enough infrastructure (e.g., water/sewer connection, roadways, broadband)	23%	Poor credit history or low credit score	15%	Poor credit history or low credit score	5%
Environmental dangers (e.g., lead-based paint, asbestos, landfill)	18%	Cost of rent/mortgage in a preferred neighborhood	9%	Cost of rent/mortgage in a preferred neighborhood	3%

APPENDIX 2 – Organization Survey Response and Data Analysis

Organization: Demographics

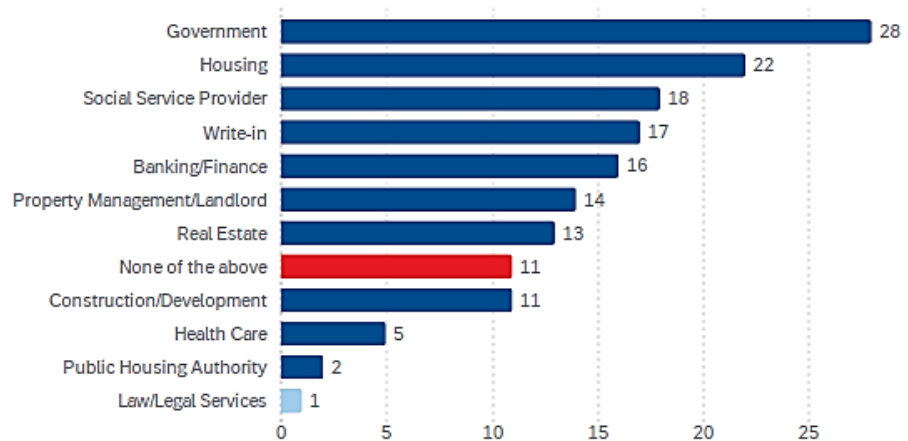
Track what kinds of organizations we are getting responses from

Avg. Employees

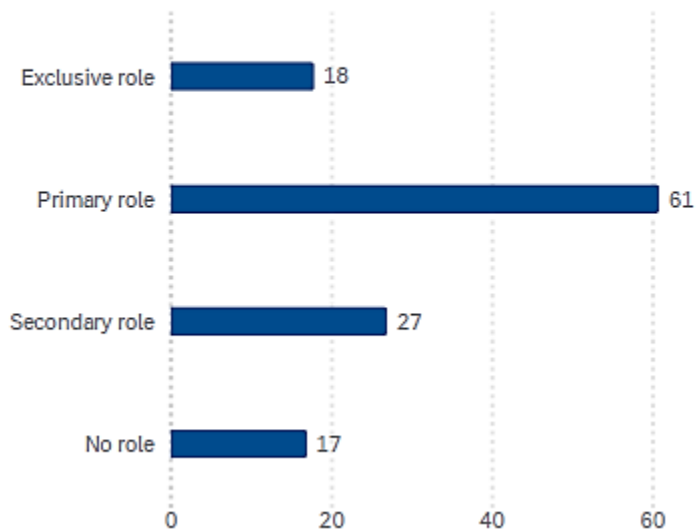
107

Organization Type 158

2,636



Housing's Role in Org Mission 123

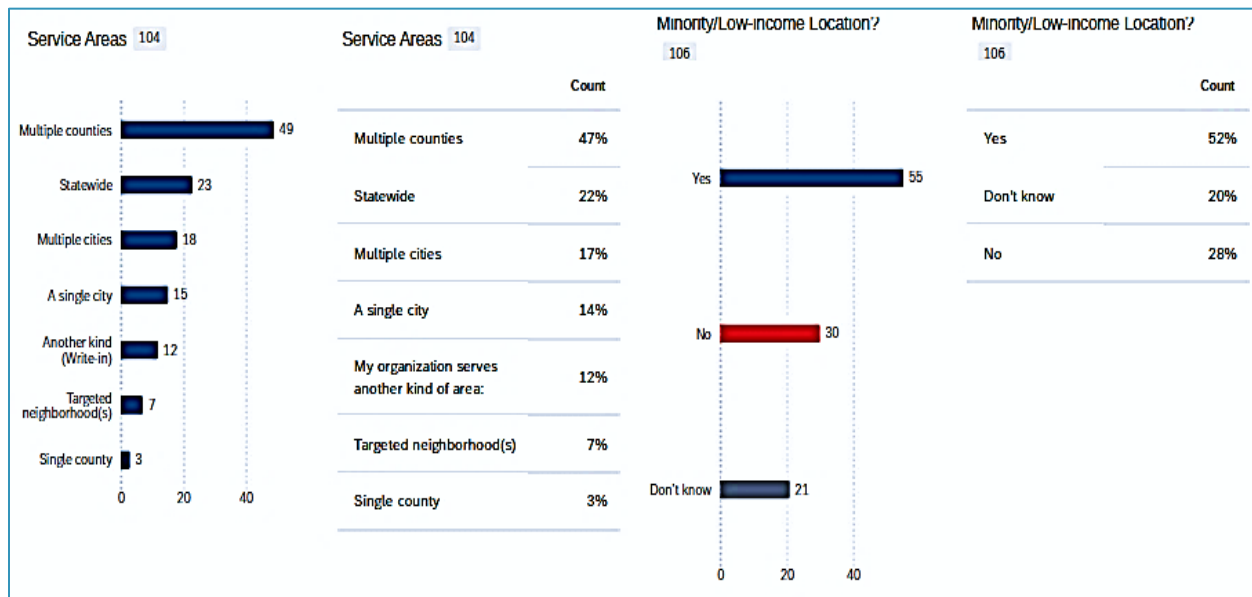


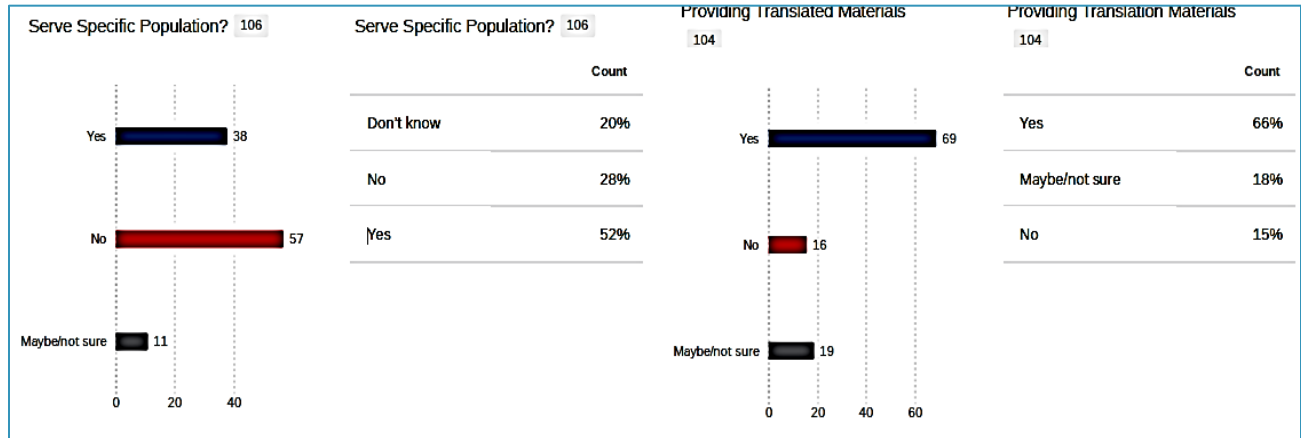
Organization Type 158		
Organization Type	Count	Percent of Total
Government	28	17.72%
Housing	22	13.92%
Social Service Provider	18	11.39%
I work for another kind of organization that deals with housing.	17	10.76%
Banking/Finance	16	10.13%
Property Management/Landlord	14	8.86%
Real Estate	13	8.23%
None of the above	11	6.96%
Construction/Development	11	6.96%
Health Care	5	3.16%
Public Housing Authority	2	1.27%
Law/Legal Services	1	0.63%

Role of Housing vs Organization Type 123

Organization Type	Exclusive role		Primary role		Secondary role		No role	
	Count	Percent of Total	Count	Percent of Total	Count	Percent of Total	Count	Percent of Total
Banking/Finance	2	1.63%	10	8.13%	2	1.63%	1	0.81%
Construction/Development	1	0.81%	3	2.44%	3	2.44%	1	0.81%
Government	1	0.81%	4	3.25%	8	6.50%	6	4.88%
Health Care	-	0.00%	1	0.81%	1	0.81%	3	2.44%
Housing	3	2.44%	11	8.94%	1	0.81%	3	2.44%
I work for another kind of organization that deals with housing.	3	2.44%	9	7.32%	4	3.25%	-	0.00%
Law/Legal Services	-	0.00%	-	0.00%	1	0.81%	-	0.00%
Property Management/Landlord	2	1.63%	8	6.50%	1	0.81%	1	0.81%
Public Housing Authority	-	0.00%	1	0.81%	-	0.00%	-	0.00%

Organization Type	Exclusive role		Primary role		Secondary role		No role	
	Count	Percent of Total	Count	Percent of Total	Count	Percent of Total	Count	Percent of Total
Real Estate	-	0.00%	7	5.69%	3	2.44%	1	0.81%
Social Service Provider	6	4.88%	7	5.69%	3	2.44%	1	0.81%

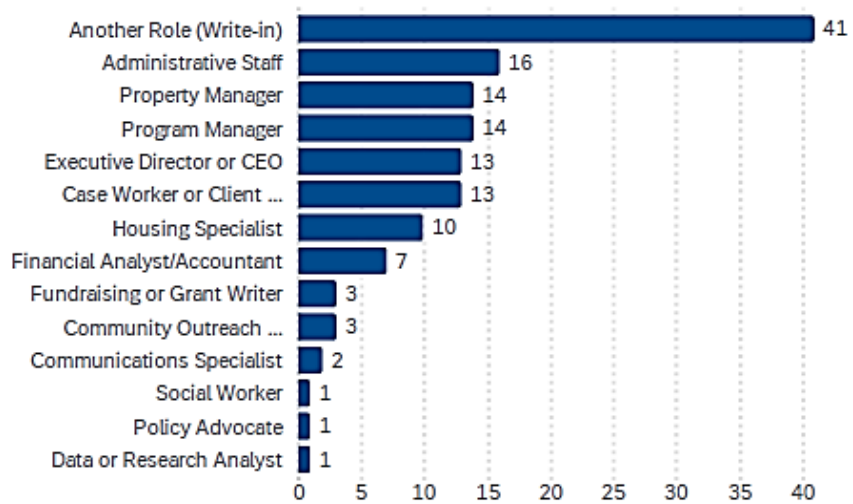




Respondent's Job Role

Survey Question:
Which of the
following best
describes your role at
your organization?

Job Role 139




Organization: Law and Knowledge

Understand organizations' existing knowledge and housing law experiences

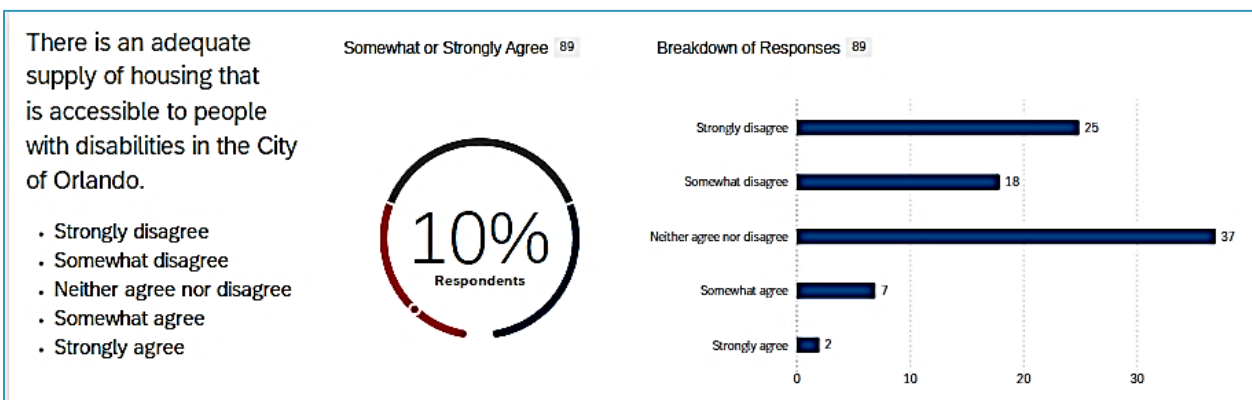
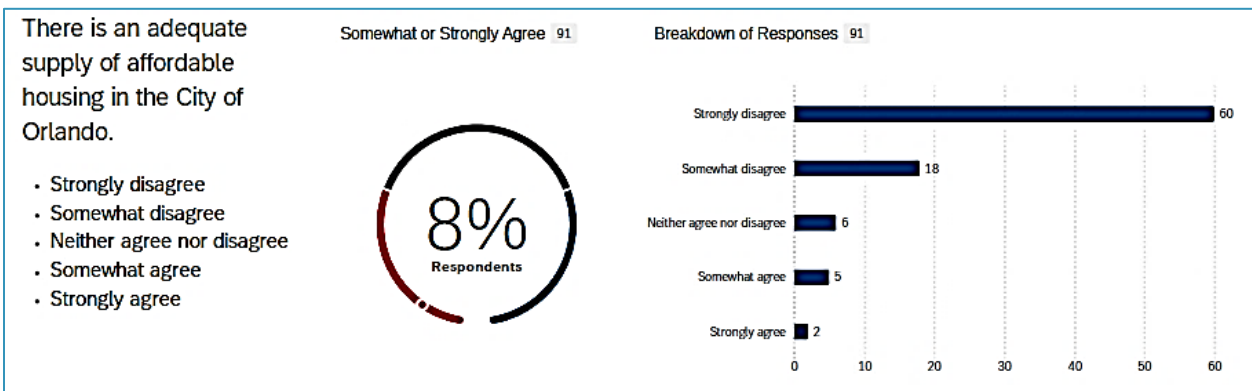
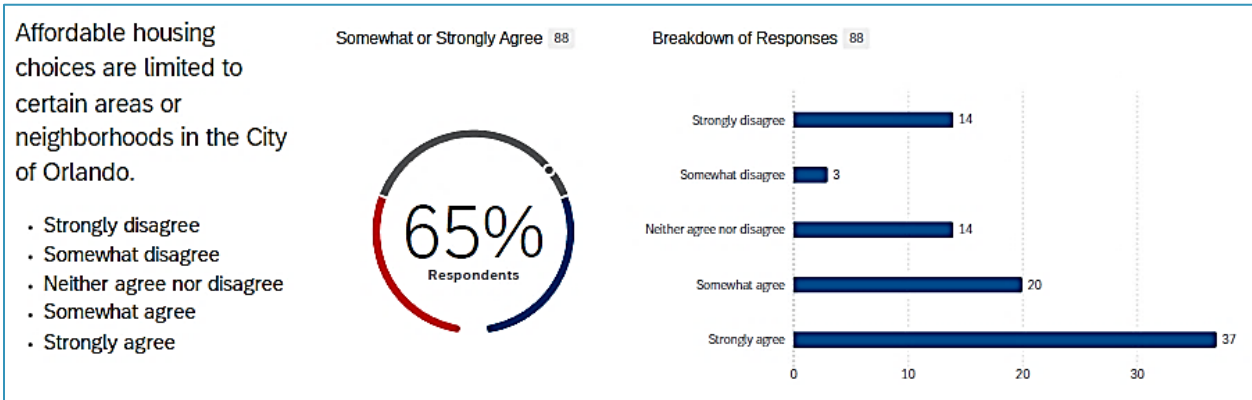
<p>Has your organization ever received grants from any of the following programs?</p> <p>NOTE: This question is multi-select, so an organization may be counted "twice" if they selected 2 grants. If you need insight into how many organizations received multiple grants, we'll have to assess that outside of Qualtrics.</p>	Grants Received 63		Write-in Grants Received 16 ▾	
	GrantsReceived	Count	Other grants received	
	My organization has received grants from other Federal, State or Local Grant Program(s):	41	CIP (possibly others)	
	Community Development Block Grant (CDBG) Program	27	I don't know	
	HUD Supportive Housing Program (Continuum of Care)	26	FHLB	
	Emergency Solutions Grant (ESG) Program	25	YHDP	
	State Housing Initiatives Partnership (SHIP) Program	21	NSP, ARPA	
	Housing Opportunities for People with Aids (HOPWA)	18	no	
	HOME Investment Partnerships (HOME) Program	17	VA	
			not sure	
			no idea	
			City of Orlando CIP	
			Unsure	
			I'm not sure about the details on this question	
			not sure	
			Not Sure	
			Ehousing	
			SAMHSA, VA	

Grants Received vs Housing Knowledge ⁶³										
GrantsReceived	Not knowledgeable at all		Slightly knowledgeable		Moderately knowledgeable		Very knowledgeable		Extremely knowledgeable	
	Count	Count	Count	Count	Count	Count	Count	Count	Count	Count
Community Development Block Grant (CDBG) Program	-	0%	1	2%	5	8%	8	13%	13	21%
Emergency Solutions Grant (ESG) Program	-	0%	1	2%	3	5%	6	10%	15	24%
HOME Investment Partnerships (HOME) Program	-	0%	-	0%	4	6%	3	5%	10	16%
Housing Opportunities for People with Aids (HOPWA)	-	0%	-	0%	2	3%	5	8%	11	17%
HUD Supportive Housing Program (Continuum of Care)	-	0%	-	0%	3	5%	6	10%	17	27%
My organization has received grants from other Federal, State or Local Grant Program(s):	1	2%	2	3%	6	10%	11	17%	21	33%
State Housing Initiatives Partnership (SHIP) Program	-	0%	-	0%	4	6%	4	6%	13	21%

<p>How does your organization learn about fair housing laws?</p> <p>NOTE: This question is multi-select, so an organization may be counted more than once if they learn about housing law in multiple ways. If you need insight into how many organizations learn about housing laws in multiple ways, we'll have to assess that outside of Qualtrics.</p>	Housing Law Learning Methods ⁹⁵			Write-in for Organization Learning Methods ⁸ 	
	OrgLearnMethod	Count	% of Total	Other Methods	
	We learn about them in another way:	11	11.58%	Training	
	Flyers or pamphlets	17	17.89%	Consult with Community Legal Services	
	On the internet	30	31.58%	Continuing Ed	
	Information provided at public event	36	37.89%	CE Courses	
	Meetings, trainings or seminars	82	86.32%	Research	
	Sum	176	185.26%	Required education regarding Fair Housing	
				annual trainings	
				Working with agencies	

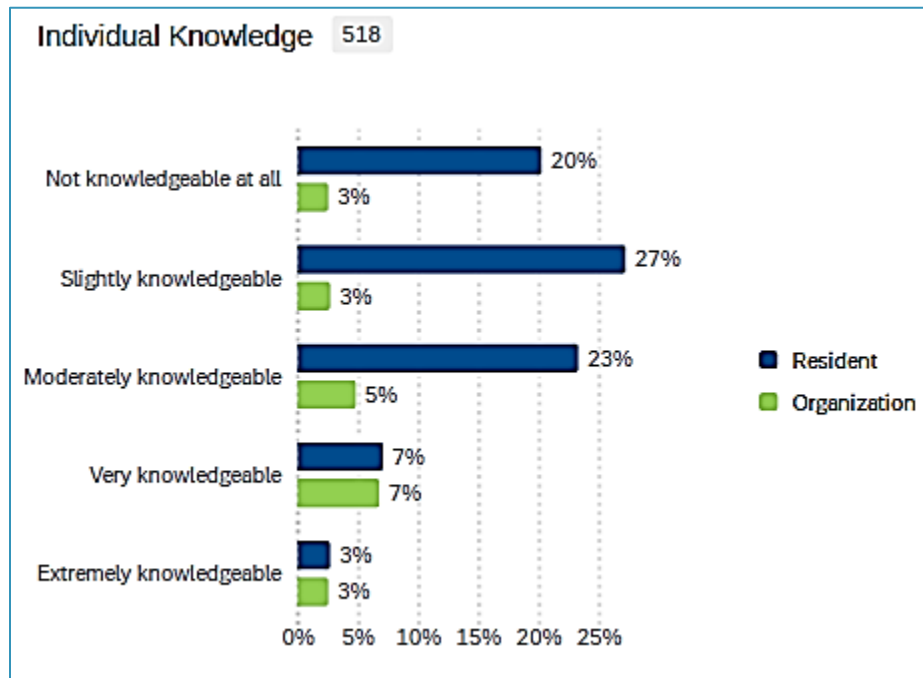
Organization: Housing Opinions

Understand organization members' overall perceptions of housing in Orlando



Resident and Org Comparisons: Housing Issues and Knowledge

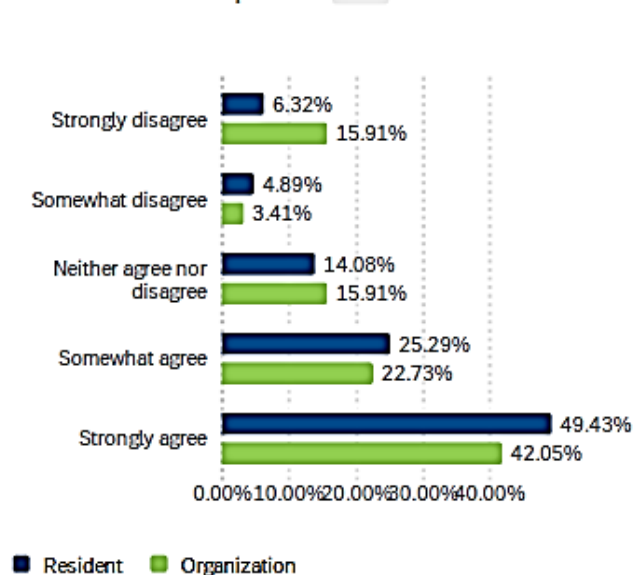
Compare residents and organization members' responses to questions on housing knowledge and issues



Affordable housing choices are limited to certain areas or neighborhoods in the City of Orlando.

- Strongly disagree
- Somewhat disagree
- Neither agree nor disagree
- Somewhat agree
- Strongly agree

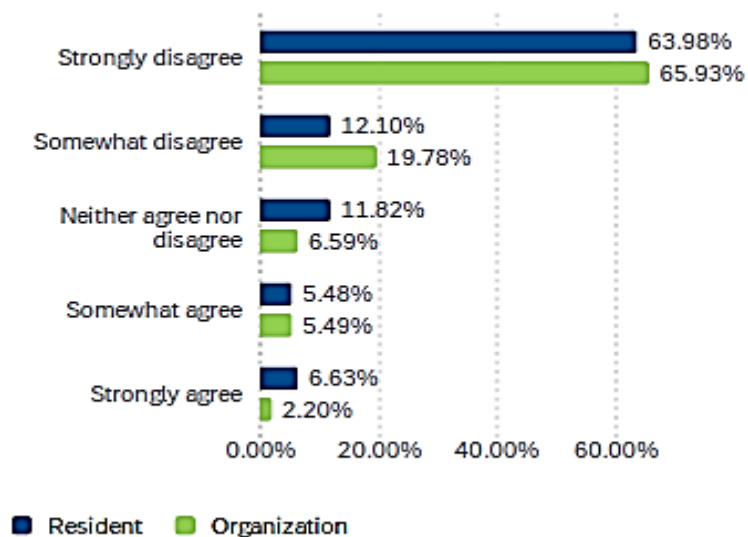
Breakdown of Responses



There is an adequate supply of affordable housing in the City of Orlando.

- Strongly disagree
- Somewhat disagree
- Neither agree nor disagree

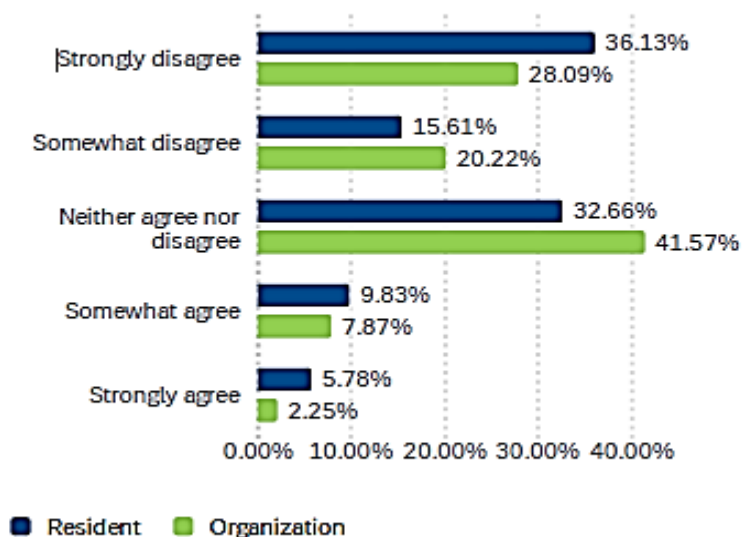
Breakdown of Responses 438



There is an adequate supply of housing that is accessible to people with disabilities in the City of Orlando.

- Strongly disagree

Breakdown of Responses 435



APPENDIX 3 – FAIR HOUSING SURVEY OPEN-ENDED QUESTIONS ANALYSIS

Fair Housing Survey Open-Ended Analysis

By Stephanie Carnell, PhD

April 29, 2024

Methods

Responses to the following two questions were analyzed using thematic analysis guidelines proposed by Braun and Clark (Braun & Clarke, 2012):

Q1: Are there any suggestions you would like to provide to improve inclusivity and access in our city neighborhoods?

Q2: Are there any additional comments you would like to provide about housing in Orlando?

For each question, I reviewed all the responses to familiarize myself with the data. After generating descriptive codes for both questions, I then generated more interpretive themes based on these codes. Where possible, the same themes were reused across questions, but instances of themes specific to certain questions are noted below. Responses with “No”, “N/A” or similar were marked as “non-responses” and excluded from analysis.

Shared Themes

Government Oversight The most frequent theme when proposing solutions for housing in Orlando (Q1) was to suggest some kind of government oversight to regulate either the cost of housing or who was eligible to own certain properties. Many respondents directly requested “rent control”, limitations on the amount rent could increase annually, or adjustments since rent is currently overpriced. One respondent gave a specific example of how their rent increases had changed drastically – “Some kind of rental cap - It's crazy that last year my rent went up \$45 and this year it went up \$200.” -- while another noted the frequency of rent increases they had experienced – “There should be a limit on rent increases. Most affordable housing units increases rent more than once a year. I been in my complex 16 years and the rent has been increased at least twice a year.”

Other responses reflected a perspective that the Orlando housing market was being dominated by corporations or investors and that these entities should be limited in some way.

“Limitation of large organizations owning multiple properties IE McKinley. And limitations to organizations owning multiple single family homes. This consolidation of housing has allowed them the power to control pricing and exacerbate affordability.”

“Stop the investors from buying everything and building 2 million dollar houses”

When providing additional comments (Q2), responses with this theme usually emphasized the need for rent control: “Need more affordable housing or rent regulation to ensure our families can afford the cost of living based on the average salaries in the area.”

Urban Planning Respondents provided solutions related to changes in urban planning across both questions. In particular, solutions related to *inclusionary zoning* (“Inclusionary Zoning,” n.d.) were prevalent. Several examples of these responses are provided below.

“Require development of affordable units in affluent neighborhoods, for example Baldwin Park and Lake Nona.”

“I would like a city ordinance that requires a certain number of affordable housing units in every multi-family housing condo or apartment unit built”

“Instead of having neighborhoods solely for the well off or JUST for the poor, create neighborhoods with mixed income”

“Yes. For any new development there should be required for that builder to provide some units there or near by. Also start converting some of these unoccupied large multi story buildings for people to live in.”

Other urban planning solutions related to a variety of concepts, ranging from changes in zoning, improving public transit, zoning more mixed-use development and changes in housing density, among other solutions. A sample of such responses are as follows:

“Because of decades of traffic planning that intentionally or effectively encouraged car transit over other forms, and which continues to date (ex: Planned Edgewater Drive [In-]complete streets eliminating bicycle lanes), the city has significantly contributed to the portion of housing accessibility that deals with access to services and disabled accessibility. A person on a bicycle or on a scooter can reasonably travel 5 times as far as a person walking, and that extended radius largely eliminates most accessibility issues. Alternatively, by building massive high-speed roads that act as interior as well as regional transit, by eliminating bicycle lanes on moderate roads that are otherwise dangerous, and by deprioritizing sidewalks on any road, the city is effectively forcing people to use cars, which is regressive to that portion of the population who cannot afford a car or the associated costs.”

“remove parking minimums! studies show one of the reasons rent prices are high is because of arbitrary parking requirements. its difficult to pay rent and be carfree in this city, planning and transportation need to work hand in hand so people arent cost burden in both rent and car associated costs”

“Loosen & promote ADU policies, upzone around transit corridors”

“In order to support an area with more restaurant, grocery store, shopping options...which I feel is important to make a neighborhood thrive..mixed income is [important]... (but I am no expert)”

Diversity in Housing Options Across both questions, respondents highlighted issues and proposed solutions related to the locations and varieties of affordable housing present in Orlando. Common points among these responses suggest a need for smaller houses or non-luxury apartments that are available in neighborhoods across the city:

“Less luxury housing! Housing should be created to meet communities' needs, not to pad investors' pockets (via real estate as an investment vehicle rather than a necessary good). I think our zoning codes are pretty forward-thinking in terms of allowing ADUs and more dense housing in formerly single-family zoned areas.”

“Affordable housing should be found through the city instead of only in pine hills and westmoreland. Otherwise you have to go out to Kissimmee”

“There would be much affordable housing in the City of Orlando if the City would stop letting developers tear down 1600 sq ft houses and rebuild 4000 sq ft houses that sell over \$1M. The City is creating their own problem.”

Support for Vulnerable Populations Many respondents mentioned a need for special provisions for certain populations within the city and even suggested specific programs that targeted these populations with aid. The most frequently mentioned population was seniors, but other groups mentioned include one-person households or young adults, families with children, teachers, workers in the tourism industry and historically-disadvantaged residents.

Addressing Larger Societal Issues Some respondents drew connections between housing issues and other societal issues, thereby suggesting that progress in addressing crime and homelessness would also indirectly improve housing issues.

“My suggestions would be considered draconian, but low crime rates cannot be achieved when individuals with a crime conviction history are allowed time and time again to be freed to roam our streets again. I am a two first degree violent felony convictions and you're locked up for life person. Habitual offenders need to be removed from society for good.”

“Do more to address the homeless situation in Orlando”

“Please find a way to not only create affordable housing but also look to the root causes of homelessness and discrimination in housing.”

Other respondents highlighted the ongoing cost-of-living problems: “The problem is the cost of living. I live in public housing, I have 3 kids, work full time, I make decent money, and I still cannot afford to get out of here. Even though I’m good with budgeting my money, it would require 2/3 incomes to sustain a comfortable living in Orlando. It makes me feel stuck! “

Funding for Programs Organization member respondents recommended several specific grant programs to apply for, while some community member respondents noted a general desire for more funding for housing programs in general.

Q1-specific Themes

Education In alignment with the knowledge measurement goal of the Fair Housing survey, some respondents suggested more education around a variety of housing topics. Several of these responses alluded to “education like this”, suggesting that the survey may have completed at one of the housing events and that the attendees were able to find some valuable information by attending.

Specific Strategies Suggested A number of more specific strategies were proposed that did not group together well into broader themes. These are reproduced in their entirety below.

Yes work with new non-profits that are in the are that focus on helping in these areas. I really believe that a lot of the old out dated help centers doesn't care enough about whats going on. I feel if they did we would hear more from them
Increase down payment assistance within the Orlando city limits to keep up with rising home prices.
When OHA puts out an RFP then they should publish the rankings and explain why they chose the finalists without interviewing all the proposals.
not sure, maybe a website/map that lists inclusivity areas
I always felt (and I have no expetise) that there could be a business model set up based on Property Management as a non-profit. Property Management companies are in business to make a profit and usually do so very well (i.e. Lincoln Properties Co.). Why couldn't an Affordable Housing complex be set up where the profits serve as down payment assistance for the people who are living there? Just an idea.
create more access to affordable housing using places that is not being currently used such as hotels/motels etc
Limit amount of times someone can receive housing assistance to give everyone a chance to thrive and improve
Provide additional access to critical information, including public data regarding apartment leasing occupancy levels.
Subsidized housing w on site managers to supervise, facilitate services
Well, redlining still exist, and there's over policing in certain communities. I don't think that there will ever be inclusivity and access in our city neighborhoods. In order to find affordable housing, you have to go to. Impoverished communities that have limited resources to jobs, limited resources, and access to healthy food stores, smaller housing and crowded apartment complexes which in turn leads to more crime due to there not being adequate job opportunities or productive things for the youth to do. There needs to be more career source and professional development in impoverished communities rather than liquor stores we should invest in putting things to uplift the community.

We need people working for the people and with the people. There's a lot empty structures out there that can be used to build communities for the homeless, veterans in need of a home. The City of Orlando is not doing enough to help the community as it should.

More assistance with income

Kids hanging out there nothing for them to do

More things for kids to do affordable for parents keep them safe

Sii q hayan actividades para los adolescente más activida adultos mayores

Q2-specific Themes

Housing Concerns about Gentrification, Equity and Fairness Concerns unique to Q2 included the replacement of established residents with expensive new real estate with certain respondents mentioning “gentrification” directly:

“Orlando is one of the hardest and most expensive cities to live in, and many people with deep roots continue to be pushed out of their homes and the area as a whole because of rampant greed and gentrification.”

Another respondent reported they felt they were about to be forced out of their neighborhood:

“I am a 35 year local and may need to move in order to afford rent. Buying a house is out of the question. I am a teacher and work side jobs. If there is affordable rent or home, it only has an AC window unit or mold history. It feels unsafe to live in anything like that. Rent and apartments are more than mortgages, but finding a home is impossible too. We need all these high rises to be affordable rents!”

Other concerns that arose in response to Q2 related to equity and fairness in the housing process. Some of these responses were somewhat neutral with general requests to remain fair – “Fair housing for EVERYONE, even returning citizen” or “Give people second chances if they can afford the housing” – while some responses suggest personal experience with inequality in the housing process:

“STOP HOUSING EMPLOYEES FROM JUMPING FRIENDS OVER LIST”

“Stop developing expensive properties that only your cronies can afford. These are the same people who are congesting our roads with their 5 cars per household.”

Critique of Existing Program Practices, Rental Requirements, etc. Issues with particular requirements for either programs or the rental process were highlighted by respondents. Examples are provided below:

“Guidelines in the SHIP Program are too restrictive specially the DTI ratios. Almost impossible to find a house with those limits in this time.”

“Requirements need to change to get into housing, pricing needs to go down, mortgage insurance rates need to go down”

Praise of Orlando governmental practices Some respondents took the general comments question at the end to show support for the City of Orlando and the housing programs it provides.

Citations

Braun, V., & Clarke, V. (2012). Thematic analysis. *APA Handbook of Research Methods in Psychology, Vol 2: Research Designs: Quantitative, Qualitative, Neuropsychological, and Biological.*, 57–71.

<https://doi.org/10.1037/13620-004>

Inclusionary Zoning. (n.d.). *Florida Housing Coalition*. Retrieved April 29, 2024, from <https://flhousing.org/inclusionary-zoning/>

APPENDIX 4 – RESIDENT AND ORGANIZATION SURVEYS

Fair Housing Survey - Resident

Introduction

The Housing and Community Development Department is asking for your feedback about housing issues and opportunities in the City of Orlando.

Who should take this survey?

We are looking for feedback from:

- residents of the City of Orlando
- members of the community interested in living in the City of Orlando
- businesses/organizations that provide housing-related programs and services in the City of Orlando

Why are we doing this survey?

Your response will help us update the city's Fair Housing Plan. This plan recommends actions the city can take to eliminate housing discrimination and promote fair housing choices for everyone in the community.

What is the Fair Housing Act?

Enacted in 1968, the **Fair Housing Act** protects people who are renting or buying a home, getting a mortgage or seeking housing assistance, from discrimination based on their:

- Race
- Color
- Religion
- Sex
- Disability (includes mental or physical impairments that substantially limit one or more major life activities)
- Familial status (includes having a child under 18, having temporary custody or seeking custody of a child under 18, or being pregnant)
- National origin (includes country of birth and country of ancestry)

In addition to the protections from the Fair Housing Act, **Chapter 57 of Orlando City Code** also protects residents from discrimination based on sexual orientation and marital status.

Executive Order 13988 expands the discrimination protections offered on the basis of sex to include gender identity and sexual orientation.

How long will this take?

This survey includes different scenarios about fair housing and questions about your personal experiences and opinions. It could take approximately 10 minutes depending on your responses.

Your honest and candid answers are greatly appreciated, but all questions are **optional**.

Do you currently work at an organization that provides housing-related services?

- Yes
- No
- Maybe/not sure

How knowledgeable are **you** about fair housing laws?

- Not knowledgeable at all
- Slightly knowledgeable
- Moderately knowledgeable
- Very knowledgeable
- Extremely knowledgeable

In the following section, you will be presented with a few different housing scenarios. Please read each scenario and answer the follow-up questions.

Scenario

An apartment building owner who rents to people of all age groups decides that families with younger children can only rent in one particular building, and not in others, because the building owner thinks younger children tend to make lots of noise and may bother other tenants.

Questions

Regardless of what the law says, do you think the apartment building owner should be able to assign families with younger children to one particular building?

- Yes
- No
- It depends
- Don't know/Not sure

Under federal law, is it currently legal for an apartment building owner to assign families with younger children to one particular building?

- Yes
- No
- It depends
- Don't know/Not sure

Scenario

A Hispanic family goes to a bank to apply for a home mortgage. The family qualifies for a mortgage but, in the loan officer's opinion, Hispanic borrowers have been less likely than others to repay their loans. For that reason, the loan officer requires that the family make a higher down payment than would be required of other borrowers before agreeing to give the mortgage.

Questions

Regardless of what the law says, do you think the loan officer should be able to require higher down payments by Hispanic families in order to get a mortgage?

- Yes
- No
- It depends
- Don't know/Not sure

Under Federal law, is it currently legal for the loan officer to require higher down payments from Hispanic families in order to get a mortgage?

- Yes
- No
- It depends
- Don't know/Not sure

Scenario

In checking references on an application for a vacant apartment, an apartment building owner learns that the applicant has a history of mental illness. Although the applicant is not a danger to anyone, the owner does not want to rent to such a person.

Questions

Regardless of what the law says, do you think the apartment building owner should be able to reject this application because of the applicant's mental illness?

- Yes
- No
- It depends
- Don't know/Not sure

Under Federal law, is it currently legal for an apartment building owner to reject this application because of the applicant's mental illness?

- Yes
- No
- It depends
- Don't know/Not sure

Scenario

An apartment building owner learns that an applicant for a vacant apartment has a different religion than all the other tenants in the building. Believing the other tenants would object, the owner does not want to rent to such a person.

Questions

Regardless of what the law says, do you think the apartment building owner should be able to reject the application because of the applicant's religion?

- Yes
- No
- It depends
- Don't know/Not sure

Under Federal law, is it currently legal for an apartment building owner to reject the application because of the applicant's religion?

- Yes
- No
- It depends
- Don't know/Not sure

Scenario

The next question involves a family selling their house through a real estate agent. They are white, and have only white neighbors. Some of the neighbors tell the family that, if a non-white person buys the house, there would be trouble for that buyer. As a result, the family tells the real estate agent they will sell their house only to a white buyer.

Questions

Regardless of what the law says, do you think the real estate agent should be able to sell this family's house only to a white buyer?

- Yes
- No
- It depends
- Don't know/Not sure

Under Federal law, is it currently legal for the real estate agent to sell this family's house only to a white buyer?

- Yes
- No
- It depends
- Don't know/Not sure

Scenario

An apartment building owner places a notice on a community bulletin board to find a tenant for a vacant apartment. The notice says, “heterosexuals preferred”.

Questions

Regardless of what the law says, do you think the apartment building owner should be able to advertise an available apartment using the phrase “heterosexuals preferred”?

- Yes
- No
- It depends
- Don't know/Not sure

Under Federal law, is it currently legal for an apartment building owner to indicate a preference based on sexual orientation in advertising an available apartment”?

- Yes
- No
- It depends
- Don't know/Not sure

In this next section, we'll ask you about your personal experience with housing in Orlando.

Have you ever experienced housing discrimination in the City of Orlando?

- Yes, I have experienced housing discrimination.
- No, but someone I know has.
- No, I have not experienced it, and neither has anyone that I know.

Which of the following options best describes the person or organization that discriminated against [you/the person you know](#)? Please check all that apply.

- ☐ Rental property manager/owner
 - ☐ Seller of a housing unit
 - ☐ Condominium or homeowner's association
 - ☐ Real estate professional
 - ☐ Loan officer or mortgage broker
 - ☐ Government employee
 - ☐ Another person or organization not listed here.
-

Why do you think [you or the person you know](#) experienced this housing discrimination? Please choose all that apply.

- ☐ Race
 - ☐ Color
 - ☐ Religion
 - ☐ Sex
 - ☐ Disability (includes mental or physical impairments that substantially limit one or more major life activities)
 - ☐ Familial Status (household includes one or more persons under 18 years of age)
 - ☐ National Origin (includes country of birth and country of ancestry)
 - ☐ Sexual Orientation
 - ☐ Marital Status
 - ☐ Another reason not listed here:
-

When [you or the person you know](#) experienced this housing discrimination, did [you/they](#) seek out help to address it?

- Yes
- No

If you answered yes, where did [you/they](#) go to get help addressing housing discrimination?

If you answered no, why did [you/they](#) decide not to seek help to address the housing discrimination?

For these next questions, please rate your agreement with the following statements.

Affordable housing choices are **limited to certain areas or neighborhoods** in the City of Orlando.

- Strongly disagree
- Somewhat disagree
- Neither agree nor disagree
- Somewhat agree
- Strongly agree

There is an **adequate supply** of affordable housing in the City of Orlando.

- Strongly disagree
- Somewhat disagree
- Neither agree nor disagree
- Somewhat agree
- Strongly agree

There is an adequate supply of housing that is **accessible to people with disabilities** in the City of Orlando.

- Strongly disagree
- Somewhat disagree
- Neither agree nor disagree
- Somewhat agree
- Strongly agree

In general, how much do the following issues restrict the selection of housing in Orlando?

	Not at all	Slightly	Moderately	Significantly	Don't know / not sure
Cost of rent/mortgage in a preferred neighborhood	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Size of available apartments/houses too small or too large	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Poor credit history or low credit score	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Not enough units that accommodate a disability (e.g., wheelchair-accessible, supportive housing)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Concern that someone would not be welcome in the neighborhood	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environmental dangers (e.g., lead-based paint, asbestos, landfill)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Crime in the area	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Not enough infrastructure (e.g., water/sewer connection, roadways, broadband)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Not enough nearby places that provide services (e.g., schools, public transit, medical services, shopping centers)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Are there any suggestions you would like to provide to improve inclusivity and access in our city neighborhoods?

Are there any additional comments you would like to provide about housing in Orlando?

How much trust or distrust do you have in the City of Orlando when it comes to handling local problems?

- A lot of distrust
- Some distrust
- Neither trust nor distrust
- Some trust
- A lot of trust

In this last section, we will ask you some demographic questions. All questions are optional.

Demographic Questions

Which zip code do you live in currently?

What is your connection to the City of Orlando? You can choose as many options as you need.

- ☐ I work here.
- ☐ I live here.
- ☐ I visit here often.
- ☐ I own a business here.
- ☐ I go to school here.
- ☐ I do not have a connection to Orlando.
- ☐ I am connected to Orlando in another way.

☐ Prefer not to answer

What is your current marital status?

- Single
- Married
- Domestic Partnership
- Divorced or separated (4)
- Widowed (5)
- Prefer not to answer (6)
- I have a different situation not included here. (7)

• Prefer not to answer

What is your annual household income?

- Less than \$19,999
- \$20,000 - \$39,999
- \$40,000 - \$59,999
- \$60,000 - \$79,999
- \$80,000 - \$99,999
- \$100,000 or more
- Prefer not to answer

Are you Hispanic, Latino or of Spanish origin?

- No, not of Hispanic, Latino, or Spanish origin
 - Yes, Mexican, Mexican American, Chicano
 - Yes, Puerto Rican
 - Yes, Cuban
 - Yes, another Hispanic, Latino, or Spanish origin
-
- Prefer not to answer

What is your race? Please choose as many as apply.

- ☐ White
- ☐ Black or African American
- ☐ American Indian or Alaska Native
- ☐ Chinese
- ☐ Vietnamese
- ☐ Native Hawaiian
- ☐ Filipino
- ☐ Korean
- ☐ Samoan
- ☐ Asian Indian
- ☐ Japanese
- ☐ Chamorro
- ☐ Asian, not listed here _____
- ☐ Pacific Islander, not listed here _____
- ☐ Another race not listed here _____
- ☐ Prefer not to answer

Fair Housing Survey – Business/Organization

Introduction

The Housing and Community Development Department is asking for your feedback about housing issues and opportunities in the City of Orlando.

Who should take this survey?

We are looking for feedback from:

- residents of the City of Orlando
- members of the community interested in living in the City of Orlando
- businesses/organizations that provide housing-related programs and services in the City of Orlando

Why are we doing this survey?

Your response will help us update the city's Fair Housing Plan. This plan recommends actions the city can take to eliminate housing discrimination and promote fair housing choices for everyone in the community.

What is the Fair Housing Act?

Enacted in 1968, the **Fair Housing Act** protects people who are renting or buying a home, getting a mortgage or seeking housing assistance, from discrimination based on their:

- Race
- Color
- Religion
- Sex
- Disability (includes mental or physical impairments that substantially limit one or more major life activities)
- Familial status (includes having a child under 18, having temporary custody or seeking custody of a child under 18, or being pregnant)
- National origin (includes country of birth and country of ancestry)

In addition to the protections from the Fair Housing Act, **Chapter 57 of Orlando City Code** also protects residents from discrimination based on sexual orientation and marital status.

Executive Order 13988 expands the discrimination protections offered on the basis of sex to include gender identity and sexual orientation.

How long will this take?

This survey includes different scenarios about fair housing and questions about your personal experiences and opinions. It could take approximately 10 minutes depending on your responses.

Your honest and candid answers are greatly appreciated, but all questions are **optional**.

Do you currently work at an organization that provides housing-related services?

- Yes
- No
- Maybe/not sure

Which of the following descriptions best describes your organization?

- Government
 - Housing
 - Property Management/Landlord
 - Construction/Development
 - Public Housing Authority
 - Social Service Provider
 - Banking/Finance
 - Real Estate
 - Law/Legal Services
 - Health Care
 - Insurance
 - I work for another kind of organization that deals with housing.
-
- None of the above

If you chose social service provider, which of the following describes the services provided by your organization?

- Elderly persons
 - Homeless
 - Persons with disabilities
 - Persons with HIV/AIDS
 - Victims of domestic violence
 - Health
 - Education
 - Employment
 - Fair housing
 - Child welfare agency
 - My organization provides another kind of social service:
-

Which of the following best describes your role at your organization?

- Program Manager
 - Case Worker or Client Advocate
 - Community Outreach Coordinator
 - Fundraising or Grant Writer
 - Housing Specialist
 - Administrative Staff
 - Volunteer Coordinator
 - Policy Advocate
 - Financial Analyst/Accountant
 - Communications Specialist
 - Executive Director or CEO
 - Property Manager
 - Data or Research Analyst
 - Social Worker
 - Legal Counsel
 - I have another role not listed here.
-

What is your organization's overall mission?

How does fair housing fit within your organization's mission?

- Exclusive role
- Primary role
- Secondary role
- No role

How many employees does your organization have?

How many of your employees speak a language other than English?

If you're not sure, feel free to estimate a number.

Please list all the languages spoken by employees other than English:

If you feel comfortable sharing the name of your organization, please write it in below.

What is the service area of your organization?

- Targeted neighborhood(s)
- A single city
- Multiple cities
- Single county
- Multiple counties
- Statewide
- My organization serves another kind of area:

Does your organization have an office or branch location in a minority and/or low-income neighborhood?

- Yes
- No
- Don't know

Does your organization primarily market to a specific population or populations?

- Yes
- No
- Don't know

If yes, please describe the population(s) your organization targets.

Does your organization provide information and marketing materials in languages other than English?

This includes items such as advertisements, pamphlets, etc.

- Yes, we provide information in the following languages:

- No
- Maybe/not sure

Has your organization ever received grants from any of the following programs?

- Community Development Block Grant (CDBG) Program
- Emergency Solutions Grant (ESG) Program
- Housing Opportunities for People with Aids (HOPWA)
- HOME Investment Partnerships (HOME) Program
- HUD Supportive Housing Program (Continuum of Care)
- State Housing Initiatives Partnership (SHIP) Program
- My organization has received grants from other Federal, State or Local Grant Program(s):

How knowledgeable are **you** about fair housing laws?

- Not knowledgeable at all
- Slightly knowledgeable
- Moderately knowledgeable
- Very knowledgeable
- Extremely knowledgeable

How knowledgeable is **your organization** about fair housing laws?

- Not knowledgeable at all
- Slightly knowledgeable
- Moderately knowledgeable
- Very knowledgeable
- Extremely knowledgeable

How does your organization learn about fair housing laws?

- ☐ Flyers or pamphlets
 - ☐ Meetings, trainings or seminars
 - ☐ Information provided at public event
 - ☐ On the internet
 - ☐ We learn about them in another way:
-

How effective are the current fair housing laws?

- ☐ Not effective at all
- ☐ Slightly effective
- ☐ Moderately effective
- ☐ Very effective
- ☐ Extremely effective

What makes the fair housing laws **effective or ineffective?**

Does your organization have written policies about fair housing?

- Yes
- No
- Don't know

Has your organization had any complaints, legal actions, or regulatory inquiries related to fair housing discrimination?

- Yes
- No
- Maybe/not sure

If yes, please describe these complaints, legal actions or regulatory inquiries.

For these next questions, please rate your agreement with the following statements.

Affordable housing choices are **limited to certain areas or neighborhoods** in the City of Orlando.

- Strongly disagree
- Somewhat disagree
- Neither agree nor disagree
- Somewhat agree
- Strongly agree

There is an **adequate supply** of affordable housing in the City of Orlando.

- Strongly disagree
- Somewhat disagree
- Neither agree nor disagree
- Somewhat agree
- Strongly agree

There is an adequate supply of housing that is **accessible to people with disabilities** in the City of Orlando.

- Strongly disagree
- Somewhat disagree
- Neither agree nor disagree
- Somewhat agree
- Strongly agree

How much do you think that the things listed below affect the segregation of residents of protected classes and limit access to housing, schools, grocery stores and banks?

	Not at all	Slightly	Moderately	Significantly	Don't know / not sure
Insurance agencies or agents refusing to issue policies or limiting coverage for a person based on their protected class status	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inability of prospective home buyers to obtain financing based on their protected class status	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Insufficient income of potential renters and/or homebuyers to qualify	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

	Not at all	Slightly	Moderately	Significantly	Don't know / not sure
Insufficient or poor credit history of potential renters and/or homebuyers to qualify	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Real estate appraisers basing home values of a neighborhood on the residents' protected class status	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Use of unfair lending practices such as the promotion of subprime mortgages or predatory lending	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Realtors showing properties only in certain areas to prospective buyers based on their protected class status	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of housing units that accommodate a disability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inadequate access to public transportation or employment opportunities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Insufficient monitoring, oversight, or enforcement of fair housing laws	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inadequate representation of protected classes on real estate advertisements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Concentration of affordable housing within certain areas in the City of Orlando	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inadequate availability of affordable housing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Excessive rental requirements and procedures imposed on protected classes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Local land use and zoning restrictions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Are there any suggestions you would like to provide to improve inclusivity and access in our city neighborhoods?

Are there any additional comments you would like to provide about housing in Orlando?

How much trust or distrust do you have in the City of Orlando when it comes to handling local problems?

- A lot of distrust
- Some distrust
- Neither trust nor distrust
- Some trust
- A lot of trust