

**2008 STAFF REVIEW OF PROPOSALS FOR
COMMUNITY/NEIGHBORHOOD DEVELOPMENT RESERVE FUNDS
(Housing Development Funds, Affordable Housing Trust Funds, Facility Acquisition/Rehab Funds, Futures
Funds)**

- 1. Project Name/Title:** Fair Housing Testing
- 2. Agency Name:** Metropolitan Milwaukee Fair Housing Council (MMFHC)
- 3. Requested Amount:** \$30,000
- 4. Project Type:** New or Continuing

5. Framework Plan Objective Most Directly Addressed by Proposed Activity:

M-1 Access to Resources – Low / moderate income persons seeking housing.

6. Product/Service Description:

The Metropolitan Milwaukee Fair Housing Council was the lone respondent to an RFP submitting a proposal to provide testing or validation of potential discriminatory behavior by rental property owners / property managers based on complaints initiated by individuals residents. The work will be performed by the MMFHC satellite office in Madison – Fair Housing Council of Greater Madison (FHCGM). The Fair Housing Council proposes to provide fair housing enforcement through complaint initiated testing using a network of trained volunteer testers. If an individual who is a member of a City of Madison protected class believes that they were a victim of housing discrimination, they can file a complaint with the FHCGM. If the results of testing indicate that discrimination likely occurred, FHCGM staff work with the claimant to determine if a formal complaint will be filed with one of the enforcement agencies such as the Department of Civil Rights or HUD.

7. Anticipated Accomplishments (Numbers/Type/Outcome):

Fair Housing Council indicates that the number of complaints are difficult to estimate given that this is an abbreviated contract period – likely 6 months rather than the previous 12 month contracts. During the last two full contract periods, FHCGM received 21 complaints from individuals who believed that they were victims of discrimination that FHCGM determined merited further testing. Based on this historical information, it is estimated that 5 complaints will be received during the 2008 contract year which will lead to further testing.

8. Staff Review:

Background: \$30,000 was transferred from the City's Department of Civil Rights (DCR) to the CDBG Office. DCR staff stated that this work would be better administered by another city agency since DCR also accepts, investigates and resolves complaints of discrimination directly. The general revenue funds will now be part of the CDBG Office base funds and will be available for 2009. In discussions with local MMFHC staff, it was decided that the majority of staff time would be spent on discriminatory testing with a small portion of time spent on outreach to publicize MMFHC's ability to provide assistance in documenting a pattern of discrimination. Part of the testing includes assisting the complainant in making a decision on whether to file a formal complaint with one of the enforcement agencies. In the event that there are few complaints during the shortened contract period, MMFHC will conduct systemic investigation(s) based on their perceived need. For example, an earlier systemic testing was initiated in an attempt to gain additional information on the family status protective class as few complaints had reached MMFHC locally. Systemic testing will take place only in the absence of specific complaints from individuals in protective classes and will be discussed with CDBG Office staff prior to implementation.

Total Cost/Total Beneficiaries Equals:

CD Office Funds/CD-Eligible Beneficiaries Equals: \$30,000 / 5 = \$6,000

CD Office Funds as Percentage of Total Budget:

- 9. Staff recommendation:** Approve contract with Metropolitan Milwaukee Fair Housing Council to provide rental housing testing in the amount of \$30,000 to run from June 1st through December 31st 2008.

Technical and Regulatory Issues	Project information
Within unit, capital, mortgage limits	NA
Within Subsidy layering limits/ analysis	NA
Environmental Review issues	NA
Eligible project	Yes
Conflict of interest	None known
Church/State issues	No
Accessibility of program	Yes
Accessibility of structure	NA
Lead-based paint issues	NA
Relocation/displacement	NA
Zoning restrictions	NA
Fair Labor Standards	NA
Vulnerable populations	NA
Matching Requirement	NA
Period of Affordability for HOME funds	NA
Site and neighborhood Standards	NA
IZ Enhancement Benefits or issues	NA
Supplanting issues	NA
Living wage issues	Will comply
B.A.D. building process	NA
MBE goal	NA
Aldermanic/neighborhood communication	City-wide
Management issues:	None known