

Analysis of Impediments to Fair Housing Choice

2007

**Final Draft
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**Municipality of Anchorage
Department of Neighborhoods
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I. Executive Summary

The Municipality of Anchorage (MOA) is a recipient of the federal Community Development Block Grant (CDBG) and the Home Investment Partnerships Program (HOME) through the federal Department of Housing and Urban Development (HUD). As a federal HUD funds recipient, the MOA is required to work to affirmatively further fair housing and to conduct an Analysis of Impediments to Fair Housing Choice (AI). The Department of Neighborhoods, formerly the Community Development Division or CDD, has been charged with completing the AI as part of its *Housing and Community Development Consolidated Plan*.

In conducting this AI, the HUD Fair Housing Planning Guide was used as a guideline and to provide direction for the project. In this document, The Department of Neighborhoods (1) examines the issue of fair housing in Anchorage and identifies problems in the community, (2) reviews internal fair housing policies, and (3) identifies methods to increase the distribution of fair housing information and education.

The former Community Development Division's first AI document was drafted in 1996. This draft was updated in 2007 by the Department of Neighborhoods in partnership with the Municipality of Anchorage, Equal Rights Commission.

The Equal Rights Commission enforces the Municipality's anti-discrimination law, Title 5. In addition to the Municipality of Anchorage's anti-discrimination law, the State of Alaska, and United States all have laws prohibiting housing discrimination. The laws have some similarities and differences on the type, or basis, of housing discrimination that is prohibited. The Federal Fair Housing Act prohibits discrimination in rental, financing, and in other housing-related transactions based on race, color, national origin, religion, sex, familial status and disability.

The following impediments are identified in the AI: (1) although low income or economic disadvantage are not protected classes under the federal Fair Housing Act or state or local law, the lack of affordable housing for persons with low income; (2) based on the number of complaints filed with enforcement agencies, and key informant interviews, a shortage of accessible housing; (3) concerns about proposed amendments to Municipal Code Title 21, specifically regarding regulating assisting living homes and developing neighborhood plans; (4) concerns about increase of predatory lending in Anchorage and Alaska, and lack of loan branch offices in minority communities in Anchorage; (5) lack of education about Fair Housing laws; and (6) specific concerns about lack of education about Fair Housing for persons with limited English proficiency (LEP).

II. Municipality of Anchorage Background Data

A. Overview

According to the 2000 United States Census, only about 32 percent of Anchorage's residents were born in Alaska and Anchorage is home to approximately 42 percent of the State's population. Anchorage is the 66th largest city in the nation, with a population of 270,951. The State of Alaska, Department of Commerce found that the Anchorage population has increased by about 1.5 percent every year since 1999.

B. Employment and Income

The Municipality of Anchorage's economic base is 17 percent of the State's entire economy. The majority of employment opportunities in Anchorage are in the following sectors: the federal government, oil, tourism, mining, commercial fishing, manufacturing (seafood processing and wood products) and agriculture. The City's private sector is the largest and fastest growing portion of the economy.

The 2000 U.S. Census indicates that 68 percent of the Anchorage population consists of families. The average household size is 2.67 persons per household. The median family income in Anchorage is approximately \$55,546. And while the median value of owner occupied housing between 2000 and 2005 rose 11.4% annually, median income increased at an annual rate of only 1.7%.

C. Housing Profile

The 2000 U.S. Census indicated that 60 percent of residents in Anchorage are homeowners and the median value of a home was \$160,700. By 2005, the median value of a home had grown to \$230,600. While the number of housing units has continued to increase in Anchorage, it has been a disproportionate number of units at the high end of the housing scale.

According to the *Housing and Development Consolidated Plan for 2003-2007* approximately 13,714 (36.3 percent) of renter households and approximately 10,309 (23.3 percent) of the owner households in the Municipality, experience a "cost burden" or pay more than 30 percent their income towards housing and utilities. Additional detailed information regarding housing issues in Anchorage can be found in the *Housing and Community Development Consolidated Plan for 2008-2012*.

D. Diversity

Anchorage is a multi-cultural community and historical minorities, or people of color, are the fastest growing segment of the population. Anchorage's minority population has increased from 21% to 33% between 1990 and 2005. Approximately 28 percent of the Anchorage population is non-white, a higher proportion than the national average for metropolitan areas. In 2000, about 13.6 percent of the

Anchorage population over the age of five spoke a language other than English at home (U.S. Census).

American Indian and Alaskan Natives are the largest non-white ethnic groups in Anchorage. This population is expected to significantly increase in the near future because of the shift in the Alaska Native population from rural to urban areas. In 2000, Alaska Natives comprised 7.3 percent of the Anchorage population. African Americans, Hispanics, and Asians each compose approximately 6 percent of the Anchorage population. Recently, there has been a large number of Hmong refugees relocated to Anchorage. Other Asian populations in the Anchorage community have also increased.

In Anchorage, the greatest concentration of historical minority populations is found in census tracts 6 and 9.01. In these tracts, 50-70 percent of the population is non-white. The neighborhoods in these tracts include Government Hill, the Central Business District, Mountain View, Fairview, and Airport Heights.

While these neighborhoods have concentrated populations of non-whites, people of color reside in lesser concentrations throughout Anchorage. This suggests that Anchorage's population may be segregated more on the basis of economic status than on race or ethnicity. The *Housing and Community Development Consolidated Plan for 2008-2012* provides additional information on the racial composition of the Municipality of Anchorage and its neighborhoods.

E. Persons with Disabilities

Nationally, 4.2 percent of the overall population has a physical disability. The Alaska Governor's Council on Disabilities and Special Education, the designated State planning body for developmental disabilities, estimates the number of Alaskans who experience developmental disabilities at 11,086 or 1.8 percent of the overall population. Assuming that the number of persons in Anchorage with developmental disabilities is roughly equivalent to its share of the State's total population, or 42 percent, there may be 4,656 residents who have a developmental disability in Anchorage.

III. Evaluation of Current Fair Housing Legal Status

As part of the AI, it is important to detail a common understanding of the meaning of "fair housing." Federal, state and municipal laws prohibit housing discrimination. The laws have some similarities and differences as detailed below.

A. Protected Classes

The federal Fair Housing Act was initially passed in 1968 and prohibited housing discrimination "based" on race, color, national origin, and religion. In 1974, amendments were passed that added sex as a basis, and included a prohibition against sexual harassment. In 1988, amendments were added to prohibit discrimination based on handicap. Handicap in the Fair Housing Act has the

same definition as handicap does under the federal Rehabilitation Act of 1973; that is, it prohibits discrimination against a person that has a physical or mental impairment that substantially limits a major life activity. Federal law also prohibits discrimination based on familial status, which protects pregnant women and children under 18 who are living with a person responsible for their care, such as a parent, foster parent, or guardian.

The Anchorage Municipal Code, A.M.C. 5.20.020, similar to the federal Fair Housing Act, was passed on November 9, 1976, and prohibits discrimination based on race, color, sex (which includes pregnancy and parenthood), religion, and physical or mental disability. In addition, the Municipal Code prohibits discrimination in housing based on age and marital status. Another provision of the Anchorage Municipal Code, A.M.C. 5.25.025, prohibits discrimination based on familial status.

Alaska State law, A.S. 18.80.240, also prohibits discrimination in housing based on the following protected classes: race, religion, color, national origin, sex, marital status, changes in marital status, pregnancy, parenthood, and physical or mental disability.

B. Prohibited Discrimination

Under the federal Fair Housing Act, persons with properties covered under the act are prohibited from engaging in the following activities based on a person's protected status:

- Refusing to sell, lease or rent;
- Discriminating in a term, condition or privilege relating to use, sale, lease or rental;
- Listing a property in a discriminatory manner;
- Discriminatory advertising, by the advertiser as well as the person placing the ad;
- Blockbusting;
- Expelling a person from occupancy;
- Inquiring into or recording the race, religion, color, sex, national origin, physical or mental disability, or familial status of tenants or prospective tenants (or age or marital status under state and local law); (Mortgage lenders and agencies/landlords who administer rental assistance under the U.S. Housing Act of 1937 are required to do so under federal law.)
- Representing that a property is unavailable when it is available; or
- To "otherwise make [a unit] unavailable," which includes
 - Steering;
 - Exclusionary zoning;
 - Redlining; or
 - Discriminatory appraisals.

C. Special Protections for Persons with Disabilities

The fair housing laws require special protections for persons with disabilities, most importantly, “a reasonable modification to residences at the expense of the person with a disability to allow full enjoyment of the property.” In seeking a reasonable modification,

- The tenant must obtain prior permission for the modification;
- The landlord may require approval of plans to assure good workmanship; and
- The renter must agree to restore the premises when the renter leaves the unit.

In addition, reasonable accommodations to rules, policies, practices or services are required under the fair housing laws. For example, a landlord may be required to provide a reasonable modification to a “no pet policy” for persons with disabilities who have service or companion animals.

D. Enforcement Agencies

The fair housing laws are enforced by three administrative agencies in Anchorage. First, the U.S. Department of Housing and Urban Development (HUD) enforces the federal Fair Housing Law. Persons seeking information about HUD’s enforcement or wishing to file a complaint should contact HUD in Seattle at 1-800-877-0246; general information about the Fair Housing Act is available by contacting the Anchorage HUD office at (907) 677-9800.

The Anchorage Equal Rights Commission investigates any alleged violations of Title 5 of the Municipal Code and can be contacted at (907) 343-4342. The Alaska State Commission for Human Rights (ASCHR) enforces the Alaska State Law prohibiting housing discrimination and may be contacted at (907) 274-4692.

IV. Analysis of Impediments to Fair Housing Choice

A. Participants

The Department of Neighborhoods contracted with the Municipality of Anchorage, Equal Rights Commission to work together on the Analysis of Impediments. A Steering Committee was created to provide input, oversee the process, review data, drafts, and conclusions. The Steering Committee includes members from the Housing and Neighborhood Development (HAND) Commission, Equal Rights Commission, and the Americans with Disabilities Act (ADA) Advisory Commission. Appendix A provides a list of Steering Committee members.

B. Methodology

The U.S. Housing and Urban Development *Fair Housing Planning Guide* was used to provide direction for developing this report and the research process. A variety of primary and secondary sources were accessed to compile information for this document throughout 2005 by Department of Neighborhoods staff.

Primary source information was collected through interviews with key informants in the community. Key informant interviews were conducted with subrecipients of Department of Neighborhoods' grant programs and local nonprofit employees, lenders, the Municipality of Anchorage Planning Department, and realtors. Respondents to the interviews were asked a series of questions based on the recommended questions from the HUD Fair Housing Planning Guide and other questions devised from community issues that are specific to Anchorage. Appendix B provides a listing of all key informants interviewed.

A key secondary resource that was utilized was a Fair Housing Survey conducted by the Dittman Research Corporation in August of 2003 for the Alaska Housing Finance Corporation (AHFC). This study interviewed five sectors of the community including residential construction contractors, rental property managers, nonprofit and agency providers, renters and realtors/lenders. Although the survey was conducted at the State level, the findings were broken down regionally, including the Southcentral region, which includes the Matanuska-Susitna Borough and the Kenai Peninsula. Because the majority of the State population lives in the Anchorage area, the study was heavily weighted towards the Anchorage area.

Additional secondary resources were reviewed such as Department of Neighborhoods program information, reports from the Federal Financial Institution Examination Council and a survey conducted on voucher shopping conducted by Alaska Housing Finance Corporation.

C. Methodological Limitations

HUD's guidance for examining fair housing choice highlights institutional barriers to housing. Likewise, this report focuses on the policies and procedures of various agencies and organizations. In accordance with this approach, informant interviews were conducted with people that often work with groups who have historically experienced discrimination and not individuals who may actually have experienced discrimination themselves. No blind testing was done to complete this AI.

Similarly, one of the key secondary sources of information, the Alaska Housing Finance Corporation Fair Housing Survey, interviewed community members in regards to fair housing issues. This survey interviewed renters, lenders, landlords, service providers, and realtors. No demographic information was collected from the respondents. Therefore, it is difficult to determine the populations sampled and if the study might have excluded certain groups, such as people that are not proficient in English. Furthermore, many of the questions in the study were tailored towards the issue of affordable housing. As a result, many of the respondents' answers relate as much to

affordable as they do to fair housing issues.

D. Impediments

1. Shortage of Affordable Housing

Although neither low income nor economic disadvantage are protected classes under the federal Fair Housing Act or state or local law, the lack of affordable housing may have a disparate impact on racial and ethnic minority groups in Anchorage, who statistically generally tend to have lower incomes. Census tracts 6.0 and 9.01 have the highest percentage of non-whites and also contain the most affordable housing in the city.

The Alaska Housing Finance Corporation Fair Housing Survey indicated that affordable housing was one of the primary concerns of renters and realtors/lenders in regards to housing options and availability. In Southcentral Alaska, 37 percent of renter respondents stated that their primary concern or observation about barriers to obtaining fair housing was that it was too expensive. An Anchorage renter commented that housing has “[T]oo high [of] a price range in a certain area I wanted to live...” In addition, in the Municipality of Anchorage’s Ten-Year Plan on Homelessness, affordable housing was identified as a key step to both prevent and end homelessness, and the plan specifically detailed the need for more affordable one- and four- bedroom units.

Another issue that relates to affordable housing and zoning in Anchorage concerns manufactured housing or mobile home parks. In Anchorage, many manufactured housing parks (mobile home parks) are older and have poor infrastructure. As a result, many long-time owners of manufactured home parks are electing to redevelop the parks, often as commercial developments, which results in the displacement of a number of households who many times are unable to relocate their homes due to the age and condition of their homes and the cost of relocation. Due to the closures of manufactured housing parks, one of the most affordable single-family housing options in Anchorage may cease to exist. In the context of considering rezoning requests, there is no current Municipal zoning law, code or policy that would require a “no net loss” of usable land appropriately zoned for affordable housing.

2. Shortage of Accessible Housing

The Alaska Housing Finance Corporation Fair Housing Survey found that 30 percent of renters had difficulty obtaining housing because of their disability and the majority of these respondents stated that it was because of accessibility constraints. Forty percent of the builders surveyed in Southcentral Alaska stated that they incorporate universal design and accessibility features into the homes or rental units that they build.

Although no statistics are available for the exact number of private sector units in Anchorage, of approximately 700 public housing units in Anchorage, only 61 (8.7%) have been configured to meet the Americans with Disabilities Act standards (according to the Public Housing Division of Alaska

Housing Finance Corporation). And, of the 61 units, only 7 of have sight and sound accessible features for persons with visual or hearing impairments.

According to the Alaska Housing Finance Corporation Agency Plan, in 2005 there were 1,442 families on the waiting list for public housing assistance in Anchorage and 332 (23%) of these families had one or more members with disabilities. Similarly, Alaska Housing Finance Corporation reports that of the 2,555 families on the Section 8 tenant-based assistance program waiting list, 409 (16%) of these households had one or more members with disabilities.

3. Zoning

Anchorage is in the process of revising Title 21, the portion of the Municipal Code regulating the City's zoning. Changes have been proposed to Title 21 that provide greater housing options to people that need assisted living. The changes, while providing some clarity on the transitional housing definition and placement, lack similar clarity on permanent supportive housing. Thus, because a specific definition of permanent supportive housing is lacking, by grouping it with rehabilitative care uses, the code is greatly impacting the ability to site housing that includes some basic services as part of its program.

Additionally, an amendment to Municipal Code Title 21 adds Section 21.05.055 that institutes a procedure for creating and adopting a neighborhood or district plan. Neighborhoods that choose to adopt these plans in the future may have more resident control and more opportunities for growth and development, while also ensuring the long-term preservation of the quality of life in their neighborhood. The passage of this ordinance is an exciting prospect for Anchorage because it will increase the opportunities for community-capacity building.

While neighborhood planning can greatly benefit a community, efforts must be made to ensure that increases housing design requirements or density limitations do not increase the overall cost of housing in specific neighborhoods. In short, it is important that the Department of Neighborhoods work with neighborhoods so that neighborhood plans do not violate fair housing laws.

4. Lending

National studies on fair housing indicate that non-whites are often discriminated against in early stages of the home lending process. Housing programs are often not advertised in historical minority communities, and non-whites do not receive as much coaching by lending agents or as many follow-up calls.

Community Reinvestment Act reports indicate that non-whites in Anchorage, particularly Hispanics and Alaska Natives, apply for conventional home loans at a lower rate than their proportional representation in the population. Alaska Natives, although they represent approximately 7 percent of the population, compose only 1-2 percent of the conventional home loans applicants from

mortgage lenders. It also appears, based on Home Mortgage Disclosure Act of 2003, that non-whites in Anchorage are more often denied conventional home loans because of their income to debt ratio, rather than their employment history, credit history and collateral. However, Asians are more likely to be denied for insufficient cash flow than other groups, but also have a higher rate of application than others.

Many financial institutions in Anchorage have a commitment to serving minorities. These financial institutions have all received either a satisfactory or outstanding CRA rating on their last review. Many financial institutions are currently in the process of being reviewed again in 2005. The following are the CRA ratings for the traditional lending institutions in Anchorage:

Bank	Date of Review	Rating
First National Bank	2001	Outstanding
Alaska First Bank & Trust	2003	Satisfactory
First Interstate Bank of Alaska	1999	Satisfactory
Key Bank of Alaska	1997	Outstanding
Wells Fargo/ National Bank of Alaska	1999	Outstanding
Northrim Bank	2002	Satisfactory
Security Pacific Bank of Alaska	1991	Satisfactory

Although many prime lenders received favorable CRA reports regarding fair lending, very few of the prime lenders have easily accessible branches in neighborhoods that have the highest concentration of minorities in Anchorage, such as in Mountain View or Fairview. The majority of bank branches are located in Midtown.

According to the Home Mortgage Disclosure Act, nationally, subprime lending has increased tenfold from 104,000 lenders in 1993 to 1 million in 1999. Key informants indicate that this trend is also occurring in Anchorage. Subprime lending caters to credit-impaired borrowers, including those who may have blemishes on their credit record, an insufficient credit history, or nontraditional credit sources. Subprime lenders assist clients in accessing loans that they could not obtain in the prime

credit market (Fishbein and Bunce, 274). However, studies such as the HUD report conducted by the Woodstock Institute show that subprime lending disproportionately serves low-income and minority clients. Furthermore, the growth of the subprime industry in Anchorage may be indicative that the traditional lending market may not be adequately serving all populations.

Predatory lending occurs primarily in subprime mortgage markets and can be undertaken by creditors, brokers, or even home improvement contractors. It involves engaging in deception or fraud, manipulating the borrower through aggressive sales tactics, or taking unfair advantage of a borrower's lack of understanding about loan terms. Key informants in Anchorage particularly indicated that excessive fees and "packing" is an issue in this community.

Since 2000, a group of interested agency and organization representatives throughout Alaska created the Predatory Lending Task Force. The Task Force's mission is to work "in identifying ways to raise public awareness on predatory lending in Alaska and ways to help individuals and families - primarily those who are low-income and minorities - protect themselves from predatory lenders." Members of the Task Force include the State Attorney General, the FBI, Consumer Credit Counseling, AARP, Alaska Mortgage Bankers, Alaska Housing Finance Corporation, Cook Inlet Housing Authority, Better Business Bureau, Fairbanks Neighborhood Housing, Anchorage Neighborhood Housing Services, HUD, the Anchorage Equal Rights Commission, and others. In July 2005, the Task Force was notified that it will become a participating site for the national Freddie Mac "Don't Borrow Trouble" anti-predatory lending campaign.

5. Fair Housing Education and the Complaint Enforcement Process

The Alaska Housing Finance Corporation Fair Housing Survey indicates that residential construction contractors, rental property managers, nonprofit and agency providers, renters and realtors/lenders have low levels of knowledge regarding fair housing issues. In response to the question, "Where would you advise someone to contact to file a fair housing complaint?" in Southcentral, Alaska, 17 percent of respondents stated they would contact the Anchorage Equal Rights Commission, 21 percent stated they would contact HUD. Furthermore, in the survey "race" was the only commonly recognized protected class.

Key informants, particularly subrecipients of HOME and CDBG funding also indicated that there needs to be a greater emphasis on educating landlords on fair housing laws. Currently, there is no organization in Anchorage or Alaska that has been specifically dedicated to the issue of fair housing advocacy. In Anchorage, educational and enforcement resources are scattered amongst different entities in the community. For example, the Disability Law Center of Alaska provides legal advocacy to people with physical or mental disabilities. However, it does not engage in an educational campaign regarding fair housing. In addition, Alaska Legal Services Corporation, through its pro bono program provides the free Landlord Tenant Clinics, but only provides other services to persons who meet certain qualifications. Similarly, Alaska Housing Finance Corporation has incorporated a fair housing education into its Housing Voucher Choice shopping education

program, and sponsors training from time to time. However, AHFC does not engage in consistently offered, community-wide fair housing education.

The Alaska Housing Finance Corporation Fair Housing Survey concluded that very few respondents knew where to report fair housing issues. One of the reasons may be that very few complaints are successful. Another may be that for potential complainants, the time it takes to file and resolve a complaint may not be compatible with his or her more immediate need of securing housing.

The fair housing laws are enforced by three administrative agencies in Anchorage. First, the U.S. Department of Housing and Urban Development (HUD) enforces the federal Fair Housing Law. Persons who are wishing to file a fair housing complaint should contact HUD’s enforcement hotline at 1-800-877-0246. The Anchorage Equal Rights Commission investigates any alleged violations of Title 5 of the Municipal Code and can be contacted at (907) 343-4342. The Alaska State Commission for Human Rights (ASCHR) enforces the Alaska State Law prohibiting housing discrimination and can be contacted at (907) 274-4692.

	Housing Complaints 2003	Housing Complaints 2004	Housing Complaint s 2005	Housing Complaint s 2006	Total
HUD	3	4	5	9	21
ASCHR	10	2	7	8	27
AERC	0	7	3	4	14
Total	13	13	15	21	62

Of the 21 cases filed with HUD in the last four years, 12 (57%) were based on disability; eight (38%) were based on race, and the remainder were filed based on either family status, sex, or national origin. Of the 21 cases filed, 11 (52%) percent were closed for no cause. Three (14%) of the cases were closed with successful conciliation or settlement agreements; similarly, three were closed for other reasons and three cases remain open as of November 2007. Finally, one disability discrimination case had a cause finding and the charging party made an election to proceed with the case in court.

Although sexual orientation is not a protected class, there have been concerns voiced in the community that this population experiences discrimination in Anchorage regarding housing. In addition, there were concerns that persons with disabilities who use service or companion animals experience discrimination. As noted above, the Fair Housing Act requires landlords to “...make reasonable accommodations in rules, policies, practices, or services, when such accommodation may be necessary to afford a person with a disability an equal opportunity to use and enjoy a dwelling.” 42 U.S.C. 3604 (f) (3) (B). Service Animals that that assist persons with disabilities are considered to be auxiliary aides and must be exempt from pet policies and from refundable pet deposits.

6. Limited English Proficiency

In December of 2003, the U.S. Department of Housing and Urban Development issued a guidance document to comply with an Executive Order that requires all federal agencies to improve access to federally assisted programs or people who, as a result of their national origin, have limited English proficiency.

Many of the Department of Neighborhoods subrecipients have informal policies of how to assist people with LEP in using their services. For example, Anchorage Neighborhood Housing Services had translated some of its education brochures into Spanish and has a volunteer translator. Currently, AHFC is in the process of approving their Limited English Proficiency plan through HUD.

In April of 2005, the Department of Neighborhoods assumed management of the Municipality of Anchorage's Weatherization Program. As a result, the Department of Neighborhoods will have more direct contact with clients who have limited English proficiency. The Department of Neighborhoods will be working on a policy to serve these clients more effectively in the near future.

V. Assessment of Current Public and Private Fair Housing Programs and Activities in the Jurisdiction

As to the shortage of affordable housing, CDBG, HOME and ESG programs continue to focus on affordable housing, and increasingly promote new affordable housing unit production. The Ten Year Plan on Homelessness also identified affordable housing as a major issue in Anchorage. During 2007, advocates of housing and homeless issues supported a campaign to create an Alaska Housing Trust, which would provide funding for housing and services of low- and extremely-low income Alaskans.

The shortage of accessible housing continues to be a challenge to those who need it, and to developers asked to build it. As affordable housing becomes a greater challenge, two-story and townhouse style homes are increasingly favored by the market and developers. These homes are generally not accessible to wheelchairs, however. The Department of Neighborhoods will continue to support through funding, organizations that have missions to build accessible housing.

As to zoning, a revision to the Municipality of Anchorage's Assisted Living ordinance was approved in 2006. The ordinance was developed by a working group of Municipal staff, lawyers and representatives of the assisted living industry. Transitional Housing was not specifically addressed by this ordinance but it has recently been included in the most recent rewrite of Title 21. Further work is necessary to ensure that Permanent Supportive Housing is understood and permitted in the community.

The Anchorage Predatory Lending Task Force was successful in bringing Freddie Mac's "Don't Borrow Trouble" campaign to Anchorage to help define and prevent and reduce predatory lending. The campaign includes defining what is unacceptable as far as predatory lending methods, and educating homeowners on how to avoid becoming the victim of predatory lending activity. Anchorage Neighborhood Housing Services, HUD, the Anchorage Equal Rights Commission, and local lending institutions, have been involved in this project.

As to fair housing education and the complaint enforcement process, the Anchorage Equal Rights Commission co-sponsored Fair Housing Conference in the spring of 2006, in conjunction with the Alaska State Commission for Human Rights, HUD, and the YWCA. Over 125 individuals, including landlords, property managers, real estate professionals, attended this free program. In addition, the "Don't Borrow Trouble" campaign began in Anchorage (see previous paragraph) and predatory lending brochures were translated into Spanish, Tagalog, and Yupik. The Municipality of Anchorage Equal Rights Commission worked in 2006 and 2007 to improve public knowledge of its role in accepting complaints and enforcing the Municipal ant-discrimination laws in housing and other areas. In 2006, the Anchorage Equal Rights created a "Service Animals and Your Business" brochure. Although not specifically geared to housing, some provisions of the brochure apply to housing or apartment sales and rental offices or other areas open to the public. The local HUD office added an Equal Opportunity Specialist position in Anchorage in 2006.

As to limited English proficiency, increasingly, clients seeking services housing assistance have limited English proficiency. The Department of Neighborhoods is currently working with a VISTA member to improve the intake process of housing programs. As noted above, the "Don't Borrow Trouble" predatory lending materials were translated into Spanish, Tagalog, and Yupik. In 2007, the Rasmussen Foundation provided a \$450,000 grant to the Alaska immigration Justice Project to develop a comprehensive Language Interpreter Center to train, certify and recruit interpreters in Alaska.

VI. Conclusions and Recommendations

From information beginning with the 2000 U.S. Census through the key recipient interviews in 2006, the Department of Neighborhoods has identified the following impediments to fair housing choice: (1) although low income or economic disadvantage are not protected classes under the federal Fair Housing Act or state or local law, the lack of affordable housing for persons with low income; (2) based on the number of complaints filed with enforcement agencies, and key informant interviews, a shortage of accessible housing; (3) concerns about proposed amendments to Municipal Code Title 21, specifically regarding regulating assisting living homes and developing neighborhood plans; (4) concerns about increase of predatory lending in Anchorage and Alaska, and lack of loan branch offices in minority communities in Anchorage; (5) lack of education about Fair Housing laws; and (6) specific concerns about lack of education about Fair Housing for persons with limited English proficiency (LEP).

To address these impediments, the Department of Neighborhoods proposes the following action steps:

A. The Shortage of Affordable Housing

1. The Department of Neighborhoods will work with the Alaska Housing Finance Corporation in development of its Consolidated Plan and the AHFC Public Housing Agency Plan to address the issue of an inadequate inventory of subsidized and affordable housing within Anchorage.
2. The Department of Neighborhoods will support efforts to develop affordable housing as detailed in the Municipality of Anchorage's Ten-Year Plan on Homelessness.
3. The Department of Neighborhoods will examine with the Anchorage Equal Rights Commission community or state policies that prohibit discrimination against persons who participate in housing assistance programs, such as individuals who have section 8 vouchers. Recommendations to be forwarded to the Mayor's Office if a change in local ordinance is considered.

B. The Shortage of Accessible Housing

1. The Department of Neighborhoods will work to ensure that grants, federal tax credits, and zero-interest federal loan programs are available to developers and project sponsors who build accessible housing.
2. The Department of Neighborhoods will commit to working with other entities in 2008 to provide a Fair Housing forum to builders and contractors in 2009.
3. The Department of Neighborhoods will work the Municipality of Anchorage's Planning Department and the Anchorage Equal Rights Commission to reduce or eliminate the fee of \$1,160 to put an accessible ramp on housing that does not meet the setback requirements.

C. Zoning Issues

1. The Department of Neighborhoods and the Anchorage Equal Rights Commission will monitor and support revisions to Title 21 that affirmatively further fair housing.

D. Predatory Lending

1. The Department of Neighborhoods, through its partner, the Anchorage Equal Rights Commission, will take a role in the Alaska State Predatory Lending Task Force and assist in the promotion of Freddie Mac's "Don't Borrow Trouble" Campaign.

2. The Department of Neighborhoods will include as a Municipal legislative priority to support legislation that requires licensing for mortgage bankers and lenders, including subprime lenders.
3. The Department of Neighborhoods will support efforts that encourage banks and lending institutions to locate in all segments of the Anchorage community.

E. Fair Housing Education and the Complaint Enforcement Process

1. The Anchorage Equal Rights Commission will provide housing education for landlords, property managers and individual service providers in various formats, and provide general information, including where to file complaints, information about accessibility, and service and companion animals.
2. The Department of Neighborhoods and the Anchorage Equal Rights Commission will encourage organizations to work to become a housing advocacy agency in Alaska.
3. As noted in the action step for accessible housing, the Department of Neighborhoods will encourage the Anchorage Equal Rights Commission to explore developing a policy that prohibits discrimination against persons who participate in housing assistance programs, such as individual who have section 8 vouchers.

F. Limited English Proficiency

1. The Department of Neighborhoods will develop a policy on LEP, as well as include a provision for subrecipients to develop their own policies. DoN will monitor subrecipients for LEP compliance.

VII. Appendices

- A. Appendix A, Subcommittee Roster**
- B. Appendix B, Public Participation Outline**

VIII. Signature Page