



**BOARD OF COUNTY COMMISSIONERS
WARREN COUNTY, OHIO**

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**TOM GROSSMANN
SHANNON JONES
DAVID G. YOUNG**

BOARD OF COUNTY COMMISSIONERS
WARREN COUNTY, OHIO

MINUTES: Regular Session – October 24, 2023

This is a summary of actions and discussions of the meeting. You may view this meeting through our YouTube Channel at <https://www.youtube.com/channel/UC1ELh0jGpXd4VV2DTgsugPA> or by contacting our office.

The Board met in regular session pursuant to adjournment of the October 17, 2023, meeting.

Shannon Jones – absent

Tom Grossmann – present

David G. Young – present

Tina Osborne, Clerk – present

Minutes of the October 12, 2023, and October 17, 2023, meeting were read and approved.

- 23-1376 A resolution was adopted to adopt classifications and point factor assignments of Water and Sewer GIS Technician within the Water and Sewer Department. Vote: Unanimous
- 23-1377 A resolution was adopted to amend resolutions #23-1293, approving a pay increase for Jeremy Turnmire with the Warren County Water and Sewer Department. Vote: Unanimous
- 23-1378 A resolution was adopted to approve the promotion of Jaydon Flannery to the position of Water Treatment Plant Operator I within the Warren County Water and Sewer Department. Vote: Unanimous
- 23-1379 A resolution was adopted to hire Brian Simpson as Sewer Collections Worker I withing the Warren County Water and Sewer Department. Vote: Unanimous
- 23-1380 A resolution was adopted to approve the end of 365-day probationary period and approve pay increase for Evan Mahle withing the Warren County Job and Family Services, Children Services Division. Vote: Unanimous

- 23-1381 A resolution was adopted to accept the resignation of Emmanuel Olorunfemi, Protective Services Caseworker II, within the Warren County Department of Job and Family Services, Children Services Division, effective October 18, 2023. Vote: Unanimous
- 23-1382 A resolution was adopted to amend resolution #23-1297, adopted October 10, 2023, to reflect the new resignation date of Andrew Bolin within Warren County Job and Family Services, Children Services Division. Vote: Unanimous
- 23-1383 A resolution was adopted to hire Austin Powell as a Building and Electrical Inspector I within the Warren County Building and Zoning Department. Vote: Unanimous
- 23-1384 A resolution was adopted to approve a pay increase for Paige Barton within the Warren County Department of Emergency Services. Vote: Unanimous
- 23-1385 A resolution was adopted to accept the resignation of David Sauer, Emergency Communications Operator, within the Warren County Emergency Services Department effective October 20, 2023. Vote: Unanimous
- 23-1386 A resolution was adopted to accept resignation of Jordan Williams, Emergency Communications Operator, within Warren County Emergency Services Department effective October 26, 2023. Vote: Unanimous
- 23-1387 A resolution was adopted to hire Nicholas Orihood as Emergency Communications Operator within the Warren County Emergency Services Department. Vote: Unanimous
- 23-1388 A resolution was adopted to hire Kayla Conger as Emergency Communications Operator within the Warren County Emergency Services Department. Vote: Unanimous
- 23-1389 A resolution was adopted to hire Sarah Hull, as Administrative Assistant, within the Grants/Solid Waste Department. Vote: Unanimous
- 23-1390 A resolution was adopted to cancel the regularly scheduled Commissioners' meeting of Thursday October 26, 2023. Vote: Unanimous
- 23-1391 A resolution was adopted to enter into a contract with Ohio Department of Health for tuberculosis funding on behalf of the Warren County Combined Health District. Vote: Unanimous
- 23-1392 A resolution was adopted to approve extension to the software license agreement with Fidlar Technologies on behalf of the Warren County Recorder. Vote: Unanimous
- 23-1393 A resolution was adopted to transfer vehicle being utilized by the Building & Zoning Department to the Warren County Park Board. Vote: Unanimous

- 23-1394 A resolution was adopted to enter into classroom training agreement on behalf of OhioMeansJobs Warren County. Vote: Unanimous
- 23-1395 A resolution was adopted to enter into classroom training agreements on behalf of OhioMeansJobs Warren County. Vote: Unanimous
- 23-1396 A resolution was adopted to enter into a host agency training agreement on behalf of OhioMeansJobs Warren County. Vote: Unanimous
- 23-1397 A resolution was adopted to approve agreement and addendum with KJ's Brighter Days relative to home placement and related services on behalf Warren County Children Services. Vote: Unanimous
- 23-1398 A resolution was adopted to approve and enter into a Subgrant Agreement between the Warren County Commissioners on behalf of the Warren County Department of Human Services and Warren County Children Services. Vote: Unanimous
- 23-1399 A resolution was adopted to approve and enter into a Subgrant Agreement between the Warren County Commissioners on behalf of the Warren County Department of Human Services and Warren County Children Services. Vote: Unanimous
- 23-1400 A resolution was adopted to authorize Vice President of Board to sign the Mobile Data Office Remodel Proposal for RJE Business Interiors on behalf of Warren County Telecommunications. Vote: Unanimous
- 23-1401 A resolution was adopted to authorize acceptance of quote 26162649 from ESRI, Inc. on behalf of Warren County Telecommunications for ArcGis Desktop Standard Maintenance renewal. Vote: Unanimous
- 23-1402 A resolution was adopted to acknowledge approval of financial transactions. Vote: Unanimous
- 23-1403 A resolution was adopted to acknowledge payment of bills. Vote: Unanimous
- 23-1404 A resolution was adopted to approve a street and appurtenances bond release for Grand Communities, LLC, for completion of improvements of the Widening of Zoar Road associated with Providence Subdivision, Section Twelve, Block A situated in Hamilton Township. Vote: Unanimous.
- 23-1405 A resolution was adopted to accept an amended certificate, create new fund #4461, approve a supplemental appropriation and a cash advance for the Township Line Road Bridge #134-3.76 project. Vote: Unanimous.
- 23-1406 A resolution was adopted to approve supplemental appropriation into Commissioners General Fund #11011111. Vote: Unanimous.

- 23-1407 A resolution was adopted to approve supplemental appropriation into Road Infrastructure Fund #4451. Vote: Unanimous.
- 23-1408 A resolution was adopted to approve supplemental appropriation into Jail Improvement Fund #4497. Vote: Unanimous.
- 23-1409 A resolution was adopted to approve appropriation adjustment from Commissioners General Fund #11011110 into Sheriff – Corrections Fund #11012210. Vote: Unanimous.
- 23-1410 A resolution was adopted to approve appropriation adjustment from Commissioners General Fund #11011110 into Juvenile Detention Fund #11012600. Vote: Unanimous.
- 23-1411 A resolution was adopted to approve appropriation adjustment within Economic Development Fund #11011116. Vote: Unanimous.
- 23-1412 A resolution was adopted to approve appropriation adjustment within County Court Fund #11011283. Vote: Unanimous.
- 23-1413 A resolution was adopted to approve appropriation adjustment within the Information Technology Department Fund #11011400. Vote: Unanimous.
- 23-1414 A resolution was adopted to approve appropriation adjustments within Facilities Management #11011600. Vote: Unanimous.
- 23-1415 A resolution was adopted to approve appropriation adjustment within Sheriff's Office Fund #11012200. Vote: Unanimous.
- 23-1416 A resolution was adopted to approve appropriation adjustment within the Building and Zoning Department Fund #11012300. Vote: Unanimous.
- 23-1417 A resolution was adopted to approve appropriation adjustment within Juvenile Court Fund #10112500. Vote: Unanimous.
- 23-1418 A resolution was adopted to approve appropriation adjustments within Telecommunications Department Fund #11012810. Vote: Unanimous.
- 23-1419 A resolution was adopted to approve appropriation adjustments within Engineer's Office Fund #2202. Vote: Unanimous.
- 23-1420 A resolution was adopted to approve appropriation adjustments within Developmental Disabilities Fund #2205. Vote: Unanimous.
- 23-1421 A resolution was adopted to approve appropriation adjustment within Dog and Kennel Fund #2206. Vote: Unanimous.
- 23-1422 A resolution was adopted to approve appropriation adjustments within Juvenile Court Fund #2247. Vote: Unanimous.

- 23-1423 A resolution was adopted to approve appropriation adjustment within the OhioMeansJobs Warren County Fund #2258. Vote: Unanimous
- 23-1424 A resolution was adopted to approve appropriation adjustment within the Sewer Revenue Fund No.5580 Vote: Unanimous
- 23-1425 A resolution was adopted to approve requisitions and authorize Deputy County Administrator to sign documents relative thereto. Vote: Unanimous
- 23-1426 A resolution was adopted to approve and enter into contract with Champlin Architecture for Criteria Architect Services on the new Warren County Criminal Suppression Headquarters Project, on behalf of the Warren County Facilities Management Department. Vote: Unanimous
- 23-1427 A resolution was adopted to authorize the Director of Facilities Management to initiate contract negotiations with HGC Construction & KZF Design for Design-Build Services for the new Warren County Court Project. Vote: Unanimous
- 23-1428 A resolution was adopted to authorize the Water and Sewer Department to enter into negotiations with Environmental Engineering Services, Inc for the design of improvements to the Dale Acres Wastewater Treatment Plant. Vote: Unanimous
- 23-1429 A resolution was adopted to authorize the issuance of a credit card for use by the Warren County Engineer. Vote: Unanimous
- 23-1430 A resolution was adopted to accept the resignation of Matt Fetty, Director of Warren County OhioMeansJobs effective November 3, 2023. Vote: Unanimous
- 23-1431 A resolution was adopted to approve operational transfer from County Commissioners' Fund #11011112 into Mary Haven Youth Treatment Center Fund #2270. Vote: Unanimous
- 23-1432 A resolution was adopted to approve the Warren County Assessment of Fair Housing relative to the Warren County Community Development Block Grant Entitlement Program. Vote: Unanimous

DISCUSSIONS

On motion, upon unanimous call of the roll, the Board accepted and approved the consent agenda.

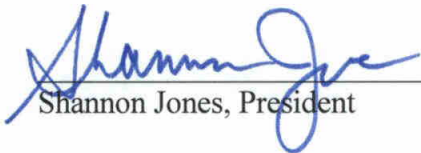
Susanne Mason, Program Manager, was present along with Cameron Goschinski, Regional Planning Commission, for a work session to discuss the Warren County Assessment of Fair Housing Plan.

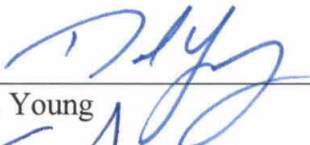
Mr. Goschinski presented the attached PowerPoint presentation, stating they have revised the plan after the last discussion to better reflect the desires of the Board and to accurately reflect some of the outside agencies' activities.


Upon discussion, the Board resolved (Resolution #23-1432) to approve the Warren County assessment of Fair Housing Relative to the Warren County Community Development Block Grant Entitlement Program.

The Board convened to the Commissioners' Conference Room for a work session to discuss the 2024 Budget.


Upon motion the meeting was adjourned.


Shannon Jones, President


David G. Young


Tom Grossmann

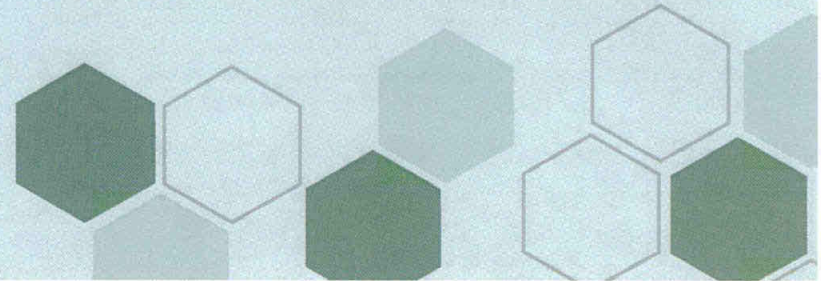
I hereby certify that the foregoing is a true and correct copy of the minutes of the meeting of the Board of County Commissioners held on October 24, 2023, in compliance with Section 121.22 O.R.C.


Tina Osborne, Clerk
Board of County Commissioners
Warren County, Ohio



Warren County

Assessment of Fair Housing



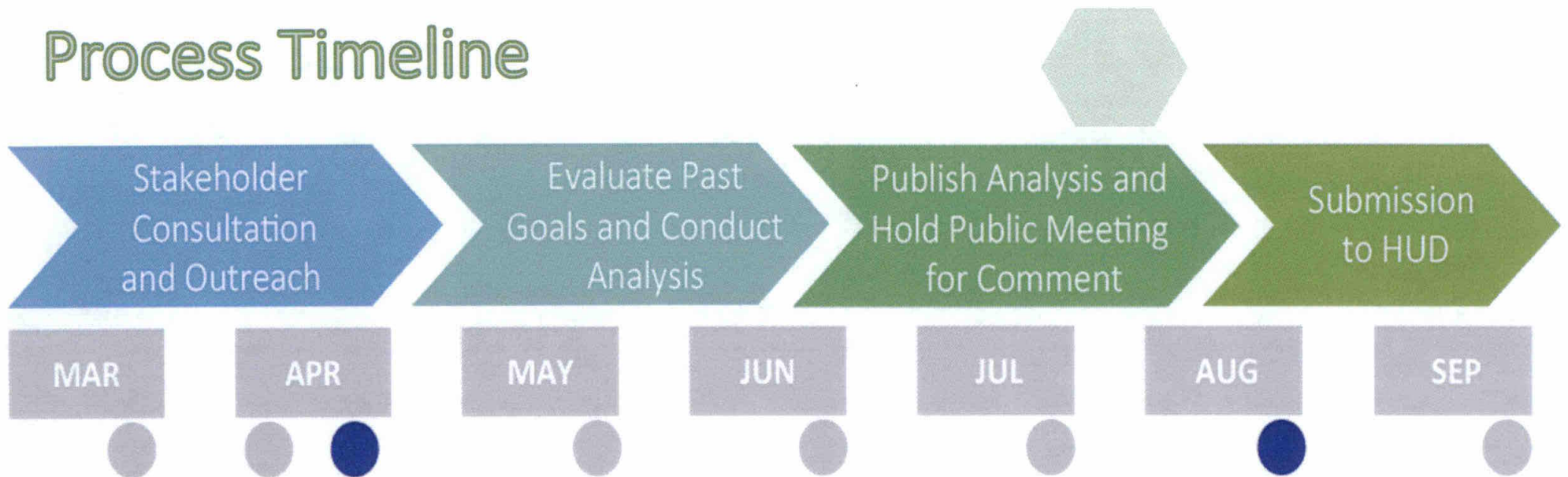


Step 1 | BOCC Resolution

Step 2 | Include in Consolidated Plan



Process Timeline



- ✓ 9 Focus Groups
- ✓ 2 Public Meetings

- Community Meetings
- Organization & Stakeholder Meetings

- Public Process Outlined in HUD Manual

Fair Housing – AFH Goal Progression

Goal	Metrics	Timeframe	Responsible Participants
Update Zoning Codes that have a Disparate Impact on Fair Housing	<p>Within four years, update two local zoning codes to address either of the following:</p> <ol style="list-style-type: none"> 1. Mixed use/cluster development; 2. Wider range of permitted housing types; 3. Reasonable accommodation; 4. Eliminate impediments for group and recovery homes; 5. Accessory dwelling units and intergenerational housing; 6. Upper story residential or the reuse of office space for residential purposes. 	<p>✓ Underway or completed by:</p> <ul style="list-style-type: none"> • Deerfield Twp • Franklin • Lebanon • Mason 	<p>RPC</p>
Expand Fair Housing Training	<p>Host a Fair Housing training for landlords and residents</p>	<p>December 2027</p>	<p>Grants Administration</p>

Fair Housing – AFH Goal Progression

Goal	Metrics	Timeframe	Responsible Participants
Analyze Transit & Transportation Options	Re-establish a Transit Advisory Committee.	✓ Completed Summer 2023	Grants Administration
	Establish a pilot program that involves transportation efficiency within a selected community.	December 2028	Grants Administration
	Communicate opportunities to school districts regarding working with state legislators to discuss the impact of size requirements for vehicles transporting students	✓ Completed Summer of 2023	Mason & Franklin City Schools
Neighborhood Improvements	Work with local planning commissions to develop plans for low opportunity areas	✓ Underway, to be completed by December 2025	RPC
Greater Participation in Advanced Education, Vocational Schools, & Financial Literacy Programs	Reach out to schools and financial institutions to provide resources and brochures for students on advanced educational opportunities, online education, and financial training.	✓ Completed 2023	West Banco, Financial Institutions

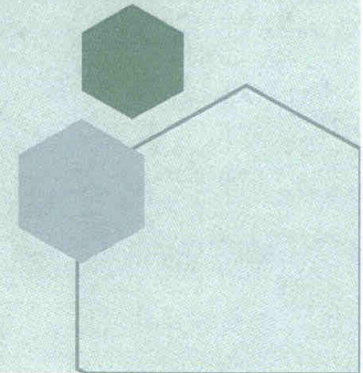
Fair Housing – AFH Goal Progression

Goal	Metrics	Timeframe	Responsible Participants
Address Mental Health Disparities	<p>Coordinate with the Mental Health Recovery Board of Warren and Clinton County to address mental health trends within the region, and among protected classes.</p> <p>Establish a mental health advisory task force to facilitate awareness and coordination among service providers.</p> <p>Continue the Sobriety Treatment and Reducing Trauma (START) program.</p>	<p>✓ Underway 2023</p> <p>✓ Underway</p> <p>✓ Ongoing</p>	<p>Warren County Combined Health Department</p>
Encourage School-Based Health Centers	<p>Establish a new school-based health center in Warren County.</p> <p>Analyze, in coordination with the existing school districts, the positive impacts of school-based health centers.</p>	<p>✓ Completed 2023</p> <p>2024</p>	<p>Clinton-Massie School, Therapeutic Interagency Preschool</p> <p>Warren County Combined Health Department</p>

Fair Housing – AFH Goal Progression

Goal	Metrics	Timeframe	Responsible Participants
Evaluate Scattered Site Public Housing vs Concentrated Public Housing Options	Communicate a preference to housing service providers	December 2026	RPC, Grants Administration, WC Administration
Promote Affordable, Quality Childcare Access	<p>Contract with a childcare service provider to promote affordable and quality childcare access.</p> <p>Encourage a major on-site employer-sponsored childcare facility.</p>	<p>✓ Completed 2023</p> <p>✓ Underway 2023</p>	<p>Warren County Human Services</p> <p>Warren County Economic Development</p>
Encourage Accessible Housing for Aging Residents and People with Disabilities	<p>Update two local zoning codes or comprehensive plans to address either of the following:</p> <ol style="list-style-type: none"> 1. Universal Design 2. Visitability 	<p>✓ Completed 2023</p>	<p>City of Franklin, Franklin Twp, Deerfield Twp</p>

Additional Slides



CIVIL RIGHTS ACT OF 1968

FAIR HOUSING ACT

Prohibits discrimination in housing-related activities based on race, color, religion, sex, national origin, familial status, and disability.



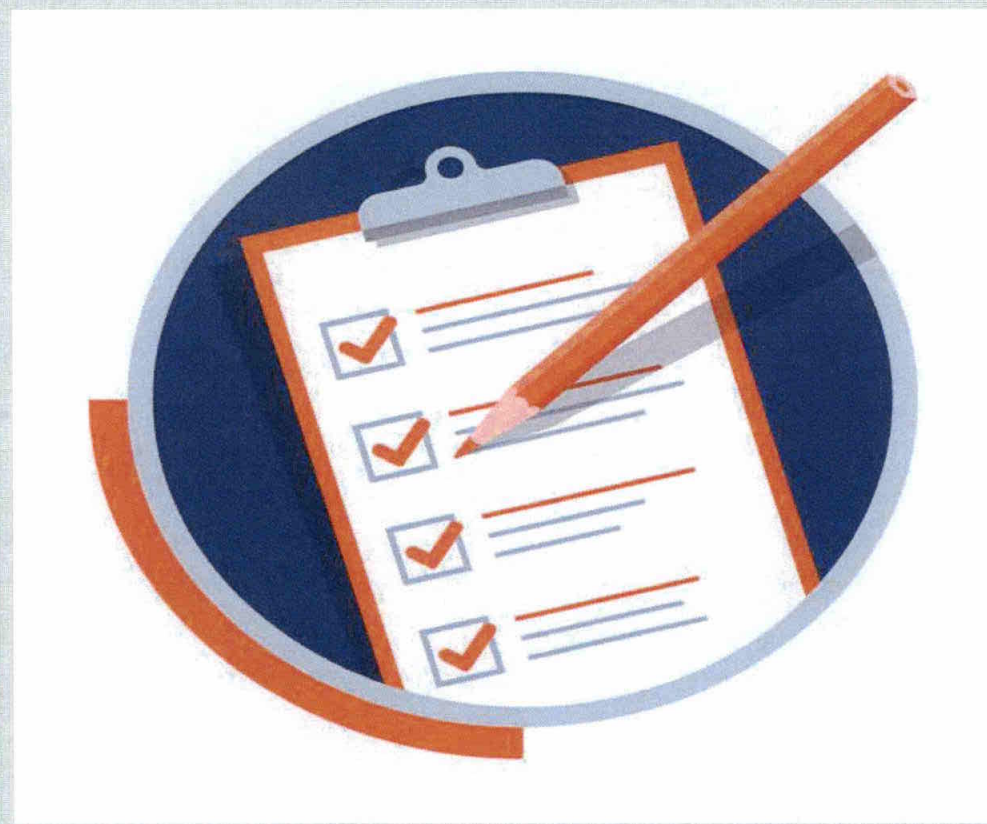
The Ohio Fair Housing Act includes military status and ancestry.

AFH REQUIREMENTS

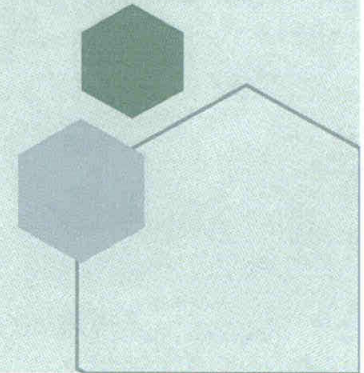
- Determine who lacks access to opportunity and address any inequity among protected class groups.
- Promote integration and reduce segregation.
- Transform racially or ethnically concentrated areas of poverty into areas of opportunity.



Recommendations

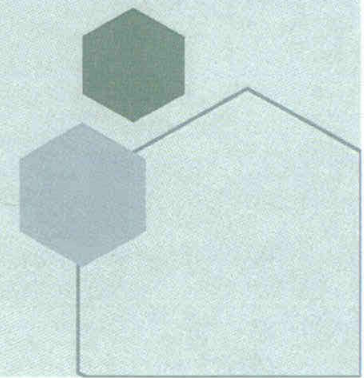
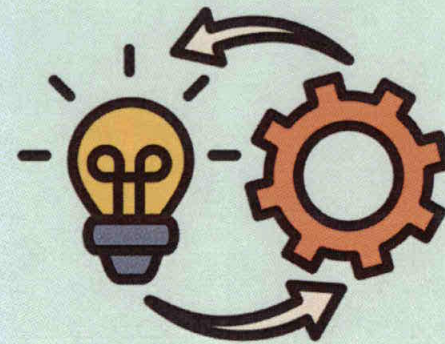


Potential Next Steps



Implementation

- Goals outlined in Assessment of Fair Housing (AFH) are included in Annual Action Plan and Consolidated Plan.
- Warren County Regional Planning Commission (RPC) and Grants Administration will monitor goals and develop two-year work programs to assess implementation of outlined AFH goals.



Conclusion



Implementation

Goal 1

Goals	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe Achievement	Responsible Program Participants
<p>Update Zoning Codes that have a Disparate Impact on Fair Housing</p>	<ol style="list-style-type: none"> 1. Lack of political will and community support. 2. Unawareness of the impact that certain provisions zoning code have on fair housing. 3. Restricted zoning standards on the variety of housing types. 	<ol style="list-style-type: none"> 1. Lack of housing availability for protected classes. 2. Lack of access to high opportunity areas. 	<p>Within four years, update two local zoning codes to address either of the following:</p> <ol style="list-style-type: none"> 1. Mixed-use/cluster development; 2. Wider range of permitted housing types; 3. Reasonable Accommodation; 4. Eliminate impediments for group and recovery homes; 5. Accessory dwelling units and intergenerational housing; 6. Upper-story residential or the reuse of office space for residential purposes. 	<p>Warren County Regional Planning Commission, Warren County Jurisdictions</p>

Implementation

Goal 2

Goals	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe Achievement	Responsible Program Participants
<p>Expand Fair Housing Training</p>	<ol style="list-style-type: none"> 1. Insufficient knowledge and awareness regarding fair housing laws. 2. Limited accessibility of fair housing training opportunities. 3. No central or recognized entity to provide fair housing training. 	<ol style="list-style-type: none"> 1. Unintentional housing discrimination 2. Denial of housing based on source of income, in particular income from nonprofit housing providers 	<p>Within the next three years, partner with the Ohio Attorney Generals Office's Civil Rights Section to effectively educate residents and enforce fair housing practices.</p>	<p>Warren County Government Officials, Housing Opportunities Made Equal, Housing Providers, Safe on Main</p>

Implementation

Goal 3

Goals	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe Achievement	Responsible Program Participants
<p>Analyze Transit and Transportation Options</p>	<ol style="list-style-type: none"> 1. Limited accessibility and opportunity for transportation among residents 2. Segmented transit systems split among multiple organizations and programs 	<p>Lack of reliable, public transit availability for access to employment, opportunity areas, services, and advanced education.</p>	<p>Within six months, re-establish a Transit Advisory Committee.</p> <p>Within five years, establish a pilot program that improves transportation efficiency within a selected community.</p> <p>Within two years, contact state legislators to discuss the impact of size requirement for vehicles transporting students.</p>	<p>Warren County Government Officials, Warren County Grants Administration, Warren County School Districts</p>

Implementation

Goal 4

Goals	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe Achievement	Responsible Program Participants
<p>Neighborhood Improvement</p>	<ol style="list-style-type: none"> 1. Areas of limited and coordinated public and private improvements. 2. Lack of long-term planning. 	<ol style="list-style-type: none"> 1. Limited access to high opportunity areas. 2. Marginal access to advanced educational services. 3. Access to employment. 	<p>Within two years, develop area or comprehensive plans for areas of low opportunity.</p>	<p>Warren County Regional Planning Commission, Local Planning Commissions</p>

Implementation

Goal 5

Goals	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe Achievement	Responsible Program Participants
<p>Greater Participation in Advanced Education, Vocational Schools, and Financial Literacy Programs</p>	<ol style="list-style-type: none"> 1. Lack of financial literacy and educational opportunities. 2. Limited higher-educational and vocational schools within the County. 3. Unawareness of financial literacy and debt counseling programs. 	<ol style="list-style-type: none"> 1. Limited employment opportunities for workforce without advanced education. 2. Lack of access to higher education and vocational schools within the County. 3. Limited opportunities for financial stability. 	<p>Within two years, provide resources and brochures for students and parents on advanced educational opportunities, online education, and financial training.</p>	<p>Warren County Government Officials, Warren County Career Center, Sinclair Mason Campus, Warren County Local School Districts, United Way of Warren County, OhioMeansJobs, Local Financial Institutions</p>

Implementation

Goal 6

Goals	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe Achievement	Responsible Program Participants
<p>Address Mental Health Disparities</p>	<ol style="list-style-type: none"> 1. Increasing population with mental health issues throughout the County 2. Limited access to healthcare resources for all residents. 3. Prominence of health care resources in higher opportunity areas. 4. Segmented coordination and limited public awareness provided by mental health providers 	<p>Marginal healthcare opportunities provided to protected classes.</p>	<p>Within four years, coordinate with the Mental Health Recovery Board of Warren and Clinton County to address mental health trends within the region, and among protected classes.</p> <p>Within five years, establish a mental health advisory task force to facilitate awareness and coordination among service providers.</p> <p>Within three years, strengthen and continue the Sobriety, Treatment and Reducing Trauma (START) program.</p>	<p>Mental Health Recovery Board of Warren and Clinton County, Warren County Combined Health Department, Warren County Board of Developmental Disabilities, Warren County Community Services, Warren County Children Services, Warren County Court and Sheriff's Office, Local Hospitals and Health Centers, Council on Aging of Southwest Ohio</p>

Implementation

Goal 7

Goals	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe Achievement	Responsible Program Participants
<p>Encourage School-Based Health Centers</p>	<p>1. Concentrated health care resources in higher opportunity school districts.</p>	<p>Limited access of healthcare resources among students of protected classes.</p>	<p>Within five years, establish a new school-based health center or cognitive behavioral therapy program in Warren County.</p> <p>Within one year, analyze, in coordination with the existing school districts, the positive impacts of school-based health centers.</p>	<p>Warren County Government Officials, Warren County Community Service's Early Learning Center, Warren County Local School Districts</p>

Implementation

Goal 8

Goals	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe Achievement	Responsible Program Participants
<p>Evaluate Scattered Site Public Housing Versus Concentrated Public Housing Options</p>	<ol style="list-style-type: none"> 1. Availability and cost of land. 2. Location based on need. 3. Availability of access to public transit. 4. Uneven distribution of public housing opportunities. 	<ol style="list-style-type: none"> 1. Segregation of protected classes. 2. Limited access to opportunity. 	<p>Within three years, communicate a preference to housing service providers.</p>	<p>Warren County, Government Officials, Housing Service Providers</p>

Implementation

Goal 9

Goals	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe Achievement	Responsible Program Participants
<p>Promote Affordable, Quality Childcare Access</p>	<ol style="list-style-type: none"> 1. Insufficient availability of childcare opportunities within the County. 2. Difficulty among parents to remain within the workforce with limited availability of quality, affordable childcare access within the County. 	<p>Limited access to reliable, affordable, quality childcare resources among parents of protected classes.</p>	<p>Within two years, contract with a childcare service provider to promote affordable and quality childcare access.</p> <p>Within three years, work to encourage a major on-site employer-sponsored childcare facility.</p>	<p>Warren County Government Officials, Warren County Division of Human Services, Warren County Community Services, Childcare Providers (Nonprofit and For-Profit), Warren County Economic Development</p>

Implementation

Goal 10

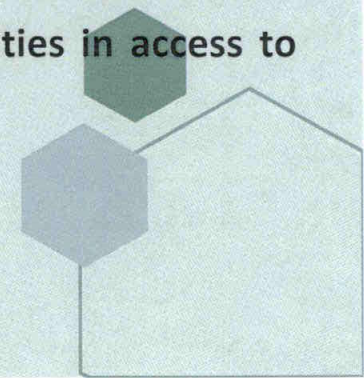
Goals	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe Achievement	Responsible Program Participants
<p>Provide Accessible Housing for Aging Residents and People with Disabilities</p>	<p>1. Limited housing availability for aging residents and people with disabilities</p>	<p>Restrictive housing availability and opportunity among protected classes.</p>	<p>Within four years, update two local zoning codes or comprehensive plans to address either of the following:</p> <ul style="list-style-type: none"> 1. Universal Design. 1. Visitability. 	<p>Warren County Regional Planning Commission, Warren County Jurisdictions, Council on Aging of Southwest Ohio, Warren County Board of Developmental Disabilities</p>

Fair Housing and Affordable Housing

“Providing affordable housing is not synonymous with [Affirmatively Furthering Fair Housing] AFFH. Providing affordable housing for low- and moderate-income families is not, in and of itself, sufficient to affirmatively further fair housing. **The delivery of decent, safe, and affordable housing provides a useful service, but by itself does not necessarily fulfill the goals and purposes of affirmatively further fair housing.**

To affirmatively further fair housing, a program participant must **take steps to ensure that the housing is available regardless of race, color, national origin, sex, disability, or familial status.** The program participant also must consider the location of affordable housing and strategically leverage affordable housing as a means to **overcome patterns of segregation, promote fair housing choice, and eliminate disparities in access to opportunity and disproportionate housing needs.”**

- HUD AFFH Rule Guidebook



Fair Housing - Discrimination

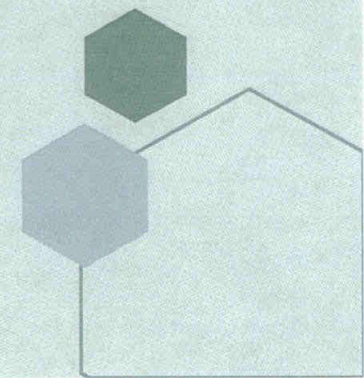
What type of discrimination is illegal?

- Intentional discrimination/disparate treatment
- Policies that have discriminatory effect/disparate impact
 - Incl. zoning laws or decisions
 - HUD issued regulation 2/15/13
- Denial of reasonable accommodation for person with a disability
 - Includes denials by government officials
- Statements indicating preference/limitation

The AFH addresses both disparate impact and disparate treatment (policies that cause systemic inequality in housing, regardless of whether they were adopted with discriminatory intent).

Disparate Impact - unintentional discrimination

Disparate Treatment – intentional discrimination



Fair Housing – AFH Process

- Civil Rights Act of 1968 identifies **protected classes**. HUD mandates fair housing assessments of protected classes every five years for CDBG funding eligibility.
 - **In 2021**, HUD replaces the Analysis of Impediments to Fair Housing (AI) with the Assessment of Fair Housing (AFH).
 - HUD reviews and either **approves** or **denies** submitted AFH plans. HUD also verifies that the AFH recommendations are geared towards improving fair housing conditions for protected groups.
- 