



Testimony of Erin Boggs, Esq. of Open Communities Alliance in Support of Raise Bill 156,  
An Act Concerning Data Collection and Analysis of Affordable Housing

Housing Committee of the Connecticut Legislature, February 23, 2016

Thank you to the leadership and members of the Housing Committee for this opportunity to testify. My name is Erin Boggs and I am the Executive Director of Open Communities Alliance, a civil rights organization dedicated to creating access to opportunity for everyone in Connecticut. OCA puts a particular focus on ensuring that housing policy reverses rather than perpetuates our history of housing segregation.

### Background

In May 2015 Harvard University released a fairly amazing study of 10 million low-income families – 5 million of whom moved out of high poverty areas. What the study found was that the children in the families that moved had significantly better life outcomes compared to the families that stayed. The children who moved, as adults, were more likely attend excellent colleges, be in stable relationships, and earn higher incomes. In fact, the average eight-year-old in a family that moved earned \$302,000 more than a family that stayed.

This tells us two things:

- (1) It is critically important that we transform struggling, poverty-concentrated neighborhoods into vital, mixed-income communities and
- (2) That beyond a need to advance social justice by supporting integration, policies that promote affordable housing choices in lower poverty areas will result in better lifetime outcomes for children and huge financial savings for state and municipal government in the form of increased tax revenue and decreased reliance on social services. For families that want them, these choices should be available.

In 2015 the Department of Housing, much to its credit, issued a report that I primarily drafted called the Analysis of Impediments to Fair Housing Choice. This report must periodically be submitted to the U.S. Department of Housing and Urban Development in order to remain in compliance with federal funding requirements. The goal of this report is to determine the forces that prevent people, and particularly historically disenfranchised groups, in Connecticut from having true choices in housing.

## Data Deficits

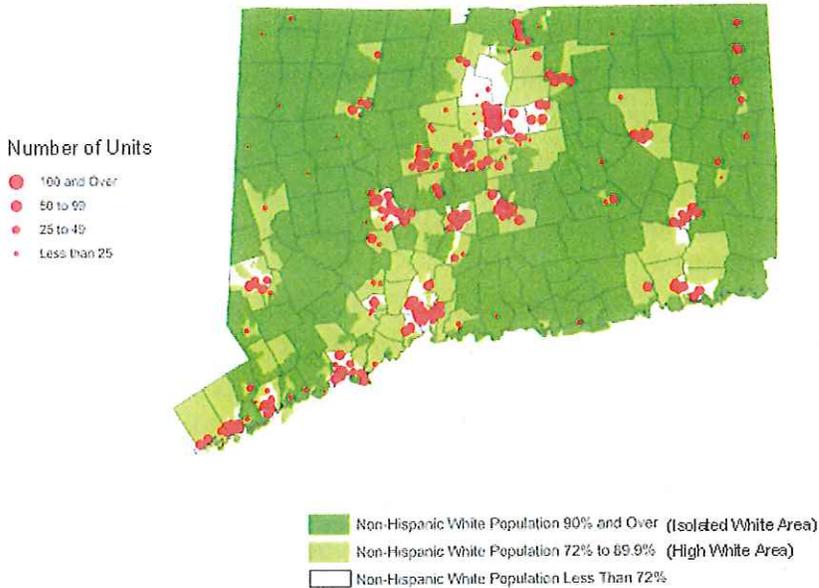
I learned two major things from my involvement in this report. First, based on the best available data, the state has a sad record, including the policies of many past administrations, in placing subsidized housing opportunities for families in areas that are low poverty (under 9.2%) and non-minority concentrated (under 30%). Based on the best data we could find, 75% of such housing is in minority-concentrated areas (6% of the land area of the state) and 78% is in high poverty areas.

Despite some positive steps and deep investments during the current administration (for which we are deeply grateful), overall our state housing policy has historically created and perpetuated poverty concentration, unfairly burdening communities of color, and limiting the housing choices of families of color who have a disproportionate need for affordable housing options due to deep income disparities, to areas with struggling schools, high levels of crime, and overburdened services. Based on OCA's own analysis, it appears these trends are continuing with current state and federal investments. Our state agencies providing housing need help, both in terms of resources and goal setting to turn this around.

The second thing I learned is that our ability to measure progress on providing housing choice, our grasp of our own housing stock, and our overall sense of housing need is greatly hobbled by a lack of data. The list that we used to generate those numbers I just cited (and in the map below), while containing 82,000 units, is incomplete. It does not consistently include basic information like number of bedrooms, income targeting information, population served, and cost per unit. It is also missing many units within the state or federal housing portfolio. Without these critical elements, it is very difficult, if not impossible, to do housing planning that promotes housing choices in a diversity of areas. In short, we cannot tell if we are making progress in reversing our history of housing segregation. Without this, Connecticut cannot truly affirmatively further fair housing as required by federal law.

## The Preservation List of Subsidized Housing by areas of Racial Concentration

Source: Connecticut Analysis of Impediments to Fair Housing Choice 2015



Preservation List by Location and Demographic Served (by tracts)				
Demographic Served	Total Units	% of Units in Disproportionately Minority Areas	% of Units in High Poverty Areas	% of Units in RCAP Areas
<i>Land Area of CT</i>		<i>5.80%</i>	<i>10.50%</i>	<i>&lt; 1%</i>
All	82,290	66%	69%	28%
Family	43,534	75%	78%	32%
Elderly	37,330	56%	58%	24%
Supportive	440	89%	83%	40%
People with Disabilities	442	48%	39%	6%

### Proposal

Raised Bill No. 156 lays out the ideal for collecting housing needs, portfolio, and affirmative marketing data and conducting analyses of this information. It draws largely on existing statutory obligations and where it does not, in some cases the data collection is already occurring but not regularly made available to the public. The problem is that it is not put together in one place annually, with all the essential information connected to particular

developments. Overall, developing a system for collecting and analyzing this data will lead to great cost savings in the form of the ability to more efficiently comply with state and federal reporting obligations, engage in effective planning, and promote housing integration – which in and of itself generates a cost savings for the state.

Raised Bill No. 156 endeavors to create a system for generating all of the data necessary need to do appropriate fair housing planning. This includes:

- (1) **A housing needs assessment:** A projection of the need for affordable housing at various income groups for various groups like elderly, families, people with disabilities, and people needing supportive housing.
- (2) **One list of subsidized housing:** A single list of subsidized housing stock across state and federal agencies that includes its name, location by physical address and census tract, affordability income requirements, number of units, number of bedrooms per unit, population served (elderly, non age-restricted, disability, or supportive housing), the program through which the development is funded and the amount of funding provided, the year of allocation, and the type of funding (new construction, substantial rehabilitation, loan, purchase or rental assistance).
- (3) **Geographical targets promoting integration:** Establishment of annual targets for the placement of subsidized housing geared towards unwinding our socially engineered segregated housing landscape.
- (4) **Annual measurement of fair housing targets:** An annual requirement to report on progress on such goals.
- (5) **Reporting on affirmative marketing progress:** Annual reporting on progress under affirmative marketing obligations.

### Housing Needs Assessment

The Commissioner of Housing already has an obligation to monitor housing needs under CGS Sec. 8-37s, 8-37u, 8-37v, 8-37qqq (which includes a requirement for an annual analysis of progress towards meeting housing needs), and federal obligations to complete a Consolidated Plan. The current reporting resulting from all of these requirements is very generalized and this bill is intended to generate more specific targets – e.g. the state needs X number of units of housing affordable at Y level or Z units of supportive, non-age-restricted or elderly housing. This bill would simply provide guidance on the most effective way to assess the data already collected in order to provide an appropriate fair housing analysis.

To that end we would recommend one change to the current proposal – adding that this needs assessment be produced by municipality. In other words, each town in Connecticut should have an allocated target for assisting the state to meet its housing need.

## **One List of Subsidized Housing**

There are a variety of sources funding and creating subsidized housing – the Department of Housing, the Connect Housing Finance Authority, the Department of Mental Health and Addiction Services, the Department of Children and Families, the U.S. Veteran’s Administration, the U.S. Department of Agriculture, the U.S. Department of Housing and Urban Development (HUD), just to name a few. It may appear daunting to collect data from all of these sources, but due to existing state reporting obligations and data that has recently been made available by HUD, compiling a full list is not as difficult as it may appear.

It is also important to note that there really are three types of housing subsidies for the purpose of a fair housing analysis:

- (1) hard units of subsidized housing owned by the state or federal government,
- (2) units rented by the government, and
- (3) units rented by individual recipients of government funding like the Housing Choice Voucher Program and the Rental Assistance Program.

Data for each of these exists and should be compiled and analyzed.

Obligations to collect housing data exist in many statutes. These include CGS 8-37t, 8-30g, 8-37qqq. In this age of spreadsheets and computers it would not be an overly complicated matter to take the data required under these current obligations and combine it to create a single list containing the information required. To the extent information is missing, for example number of bedrooms, it would be relatively easy to complete by adding a few additional questions to the annual reporting required of the managers of subsidized housing.

The new piece that this bill proposes to add to the current data reporting requirements is collection of housing data from across other agencies. An initial effort at this already exists. The Preservation List is a list of 82,000 units of subsidized housing collected by CHFA to determine when certain subsidized units are scheduled to time out of their subsidies. This list was updated, corrected, and geocoded for the purposes of the Analysis of Impediments to Fair Housing Choice. It would not be a major undertaking to complete this list and keep it updated on an ongoing basis. However, to the extent this triggers a cost, at least a single list from DOH and CHFA would be an important start.

## **Geographical Targets and Measurement of Annual Targets**

Connecticut General Statute Sec. 8-37cc(b) requires that,

*Each housing agency shall affirmatively promote fair housing choice and racial and economic integration in all programs administered or supervised by such housing agency.*

It is not possible to comply with this obligation or the federal obligation to affirmatively further fair housing unless the state sets out geographical targets and measures progress towards them.

### **Affirmative Marketing Report**

According to CGS Sec. 8-37ee, each entity receiving funding from the Department of Housing and the Connecticut Housing Finance Authority shall engage in affirmative marketing, that is, an effort to recruit a diverse pool of applicants. These plans are to be reviewed by the agencies. Consistent with the CGS Sec. 8-37cc and federal Fair Housing Act's obligation to affirmatively further fair housing DOH and CHFA should be evaluating the results of these efforts.

### **Alternative Option**

All of the provisions of Raised Bill No. 156 are already required by statute, can easily be extracted from data that currently exists, can be gathered at effectively zero cost or is already required by state or federal law. This data collection effort will streamline current reporting, greatly help the state's planning and evaluation process, and allow the state to comply with its obligation under federal law to affirmatively further fair housing.

However, should it be determined that this proposal carries a fiscal note, we would recommend an alternative. Consider re-imposing the duties of CGS Sec. 8-37bb on the Department of Housing. This provision requires critical fair housing reporting. It originally applied to both DOH and CHFA, but DOH successfully petitioned the Housing Committee to remove it from the statute in 2011, arguing that the obligation was duplicative. It turns out it is not. Proposed amendments to CGS Sec. 8-37bb are attached.

### **Conclusion**

Thank you for the opportunity to testify today. When you want to accomplish a task you need to collect data, set goals, evaluate progress, and adjust strategies when needed. Currently, in one of the most segregated states in the country, we are not using the resources we have to make meaningful progress on fair housing goals. For the future of Connecticut's children of all races, please consider these proposals.