2016 Assessment of Fair Housing

DRAFT FOR PUBLIC DISPLAY

July 28, 2016

City of Harrisonburg
City Manager's Office
409 South Main Street, Harrisonburg, VA 22801

Harrisonburg Redevelopment & Housing Authority
P.O. Box 1071, Harrisonburg, VA 22803

EQUAL HOUSING OPPORTUNITY

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

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I. Cover Sheet

1. **Submission date:** September 30, 2016
2. **Submitter name:** City of Harrisonburg, VA
3. **Type of submission (e.g., single program participant, joint submission):** Joint submission
4. **Type of program participant(s) (e.g., consolidated plan participant, PHA):** Consolidated plan participant, PHA
5. **For PHAs, Jurisdiction in which the program participant is located:** Harrisonburg, VA
6. **Submitter members (if applicable):** Harrisonburg Redevelopment and Housing Authority
7. **Sole or lead submitter contact information:**
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    b. **Title:** Assistant to the City Manager
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    d. **Street address:** 409 South Main St
    e. **City:** Harrisonburg
    f. **State:** VA
    g. **Zip code:** 22801
8. **Period covered by this assessment:** FY 2017-2021
9. **Initial, amended, or renewal AFH:** Initial AFH

11. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;

12. The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o), and 903.15(d), as applicable.

    All Joint and Regional Participants are bound by the certification, except that some of the analysis, goals or priorities included in the AFH may only apply to an individual program participant as expressly stated in the AFH.

Signature Date

Signature Date

13. Departmental acceptance or non-acceptance:

Signature Date

II. Executive Summary

1. Summarize the fair housing issues, significant contributing factors, and goals. Also include an overview of the process and analysis used to reach the goals.

The preparation of this Assessment of Fair Housing (AFH) serves as a component of the efforts of the City of Harrisonburg and Harrisonburg Redevelopment and Housing Authority (HRHA) to satisfy the requirements of the Housing and Community Development Act of 1974. This act requires that any community receiving Community Development Block Grant (CDBG) funds and all public housing authorities "affirmatively further fair housing."

The federal Fair Housing Act prohibits discrimination in housing based on a person's race, color, religion, gender, disability, familial status, or national origin. The Virginia Human Rights Act includes an additional four characteristics – pregnancy, childbirth or related medical conditions, age, and marital status. In addition, the U.S. Department of Housing and Urban Development (HUD) issued a Final Rule on February 3, 2012 that prohibits entitlement communities, public housing authorities, and other recipients of federal housing resources from discriminating on the basis of actual or perceived sexual orientation, gender identity, or marital status. Persons who are protected from discrimination by fair housing laws are referred to as "members of the protected classes."

This AFH is a review of demographic data, metrics of discrimination and disparity, and local regulations and administrative policies, procedures, and practices that affect the location, availability, and accessibility of housing. It also assesses the conditions, both public and private, that affect fair housing choice.

A citywide dialogue on the trends and issues relating to housing drove the development of the AFH. This public engagement process solicited multiple perspectives including those of government agencies, fair housing advocates, housing developers, non-profit organizations, and the general public.

Two public meetings and nine stakeholder group interviews, plus additional phone conversations as needed, were conducted between early June and early August, with one additional public hearing in September for the AFH's official adoption. An online survey, which was publicized simultaneously with the meetings and interviews, solicited input from residents and stakeholders about their knowledge and experiences related to housing discrimination.

The combination of quantitative data analysis and qualitative research identified a series of factors that significantly contribute to fair housing issues in Harrisonburg. These

contributing factors were assigned three priority levels based on the amount and strength of the supporting evidence that initially identified the factor:

- High – factors that limit or deny fair housing choice or access to opportunity, as well as other factors that are urgent or establish a foundation for future actions
- Medium – moderately urgent or building on prior actions
- Low – limited impact on fair housing issues

The contributing factors are organized into groups that align with the issues discussed in the Fair Housing Analysis section of the AFH: (B)(i) Segregation/Integration; (B)(ii) Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs); (B)(iii) Disparities in Access to Opportunity; (B)(iv) Disproportionate Housing Needs; (C) Publicly Supported Housing; (D) Disability and Access; and (E) Fair Housing Enforcement, Outreach Capacity, and Resources. Some contributing factors appear for multiple issues.

Contributing Factor	Priority	Discussion
(B)(i) Segregation/Integration		
Community Opposition	**Medium**	HRHA faced vocal community opposition during the planning phase of a new project-based development. This opposition caused HRHA to find an alternate location for the project, which is now called Commerce Village and serves homeless people with mental and physical disabilities. The fact that strong community opposition, although uncommon to this degree in Harrisonburg, can derail an affordable housing project makes addressing this factor moderately urgent.
Lack of private investments in specific neighborhoods	Low	For the most part, new private, multi-family development in the City caters to JMU students. This means that some neighborhoods, particularly those close to JMU and other amenities sought by students, see a lot of private investment, while others do not. This private developer preference has not risen to the level of outright discrimination, but is trend in the housing market of which the City and HRHA should be aware.
Location and type of affordable housing	**High**	In addition to the type of affordable housing mentioned above, the location of affordable housing is a major influence citywide. Harrisonburg's most segregated neighborhood (tract 2.04) and the neighborhoods adjacent to it contain some of the more affordable rental options in the City. In addition, around half of HRHA's Housing Choice Vouchers are used outside the City in Rockingham County due to the increased affordability of units there.
(B)(ii) R/ECAPs		
Lack of private investments in specific neighborhoods	Low	See above.
Location and type of affordable housing	**High**	See above.
(B)(iii) Disparities in Access to Opportunity		
The availability, type, frequency, and reliability of public transportation	**High**	According to local stakeholders, Harrisonburg's transit system does not provide access to employment centers or certain critical community amenities such as the central post office in the City's southern area or the poultry processing facilities in the County. The Harrisonburg Department of Public

Contributing Factor	Priority	Discussion
		Transportation's decision-making ability regarding hours and coverage are limited and tied heavily to the needs of the University, which are frequently mismatched with those of the protected classes in the community.
Lack of private investments in specific neighborhoods	Low	See above.
Location of employers	**High**	This contributing factor is closely tied to others concerning public transportation. Numerous major employers are located outside the City limits, or are located within the City but outside the reach or convenience of the current bus routes. Access to decent employment is one of the most effective pathways to increased opportunities for low-income families.
Location and type of affordable housing	**High**	See above.
(B)(vi) Disproportionate Housing Needs		
The availability of affordable units in a range of sizes	**Medium**	Small families with fewer than five members are much less likely to have housing problems than large families and non-families, with a rate of problems a full 35 percentage points lower than large families within the City. Of the 115 households on HRHA's waiting list, 75 (or 65%) are families with children. Non-families experience the most severe cost burden. They are more than twice as likely to be severely cost-burdened as large families, and almost four times as likely as small families. These facts indicate a significant disproportionate need for housing assistance for both large families with children and small (i.e. single person) households compared to other household types.
Lack of private investments in specific neighborhoods	Low	See above.
(C) Publicly Supported Housing		
Community opposition	**Medium**	See above.
(D) Disability and Access		
Access to transportation for persons with disabilities	**Medium**	All of the issues regarding transit in Harrisonburg already discussed apply to persons with disabilities, although individuals with disabilities are disproportionately affected by the limited transportation options as they tend to rely heavily on public transit due to an inability to drive, walk, or bike to destinations or a lack of income to purchase a personal vehicle. Because all City buses are wheelchair accessible and paratransit services are available, this factor as it specifically applies to persons with disabilities involves building on prior actions to address transit needs at a more basic level.
Inaccessible sidewalks, pedestrian crossings, or other infrastructure	Low	Currently, many areas of the City lack sidewalks, handicap accessible curb cuts, and APS signals. However, the City is gradually installing sidewalks and curb cuts in older neighborhoods where they were not previously required, and traffic signals are replaced with APS signals when repairs are required. Additionally, the City is currently updating its Bicycle and Pedestrian Plan with the goal of ensuring that improvements are accessible to all users. Given that resources are already being devoted to mitigating this factor, the urgency to address it is low.

Contributing Factor	Priority	Discussion
Lack of affordable, accessible housing in range of unit sizes	**Medium**	Similar to transportation issues, persons with disabilities share a basic need for affordable housing with other low-income households. For the most part, the greatest difficulty faced by a person with a physical disability looking to buy or rent a home is finding a unit that is already accessible or easily modified. Things like no-step entries, bathrooms on the first floor, curb cuts, etc. are not always common features in Harrisonburg's housing stock.
(E) Fair Housing Enforcement, Outreach Capacity, and Resources		
Lack of resources for fair housing agencies and organizations	**High**	Just as funding for CPD programs around the country have been decreasing, there is a chronic underfunding of enforcement, investigation, and outreach agencies in Harrisonburg. Without sufficient enforcement resources, progress in affirmatively furthering fair housing will be extremely difficult.

The ultimate purpose of completing an AFH and identifying factors that significantly contribute to fair housing issues is to inform the City's and HRHA's future planning processes and funding decisions. Moving forward, the City and HRHA will allocate a portion of their federal resources to address these issues and affirmatively further fair housing.

In order to achieve this outcome, a series of goals was developed to overcome the identified contributing factors and related fair housing issues, each accompanied by metrics and milestones for determining what results will be achieved and the parties responsible for them. Limited financial and staff resources preclude the City and HRHA from pursuing the resolution of every contributing factor identified in the AFH. Therefore, only contributing factors determined to be a High or Medium priority are addressed by one or more of the following goals.

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Expand housing choice and access to opportunity	Location and type of affordable housing The availability of affordable units in a range of sizes Lack of affordable, accessible housing in range of unit sizes	Segregation/Integration R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs Disability and Access	Continue to maintain a list of local publicly supported developments with expiring subsidies in order to identify partners and potential sources of funding for preservation. Require City planning staff to evaluate the impact on fair housing choice for every residential development proposal. Utilize incentives to encourage those that increase the supply of affordable housing in high opportunity areas and/or outside of "concentration areas." Reach out to private landlords to increase participation in the Housing Choice Voucher program, particularly those in higher opportunity neighborhoods. Maintain a list of "friendly" landlords who have accepted HCVs in the past on an ongoing basis.	City of Harrisonburg Harrisonburg Redevelopment and Housing Authority
Discussion: Fair housing is distinct from affordable housing. However, there is a great deal of overlap between the two issues. Fair housing experts and advocates, including those consulted in Harrisonburg, know that the most prevalent barrier to fair housing is unaffordability. To address the contributing factors related to the type and location of affordable housing, the City and HRHA will partner with the private market and other public organizations to increase the supply and variety of affordable housing in high opportunity neighborhoods.				
Increase homeownership among low-income households and members of the protected classes	Location and type of affordable housing The availability of affordable units in a range of sizes Lack of affordable, accessible housing in range of unit sizes	Segregation/Integration R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs Disability and Access	Within the next five-year planning cycle, create a framework for providing down payment assistance for qualified first time homebuyers. Within the next three years, begin holding annual homebuyer education and financial literacy workshops.	City of Harrisonburg Harrisonburg Redevelopment and Housing Authority
Discussion: The City of Harrisonburg has a relatively low homeownership rate, especially among certain racial and ethnic groups. Particularly, Black and Hispanic households have at least two times lower homeownership rates than other racial/ethnic groups. Persons with physical disabilities looking to buy a home also face difficulty in finding a unit that is already accessible or easily modified. Increasing homeownership for protected classes not only helps these households build wealth and access opportunity, it relieves pressure from the rental market. The City and HRHA will coordinate to help qualifying HRHA residents and other low-income households in the City responsibly achieve homeownership.				

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Improve the utility of public transit for low-income and disabled persons	The availability, type, frequency, and reliability of public transportation Location of employers Access to transportation for persons with disabilities	Disparities in Access to Opportunity Disability and Access	Within one year, identify any key community asset or major employer currently underserved by transit service. Within three to five years, adjust transit routes and schedules to provide improved access to the identified locations.	City of Harrisonburg
Discussion: Practical, economical transportation is an essential element of daily city life. For many low-income households and members of the protected classes, the available transportation options in Harrisonburg are inconvenient or costly enough to be unreasonable choices. The City will work together with the transportation department, JMU, Rockingham County, and local employers to assess the current effectiveness of public buses in addressing the needs of the low-income and protected classes, and adjust service accordingly to better reach key community assets.				
Strengthen anti-discrimination investigation, enforcement, and operations	Lack of resources for fair housing agencies and organizations	Fair Housing Enforcement, Outreach Capacity, and Resources	Within two years, contract with a HUD-certified organization to conduct paired discrimination testing in the local rental market. Within one year, conduct the four-factor analysis to determine the extent to which document translation is needed. Prepare a Language Access Plan if it is determined to be necessary. Annually train City and HRHA staff to refer callers about fair housing to the designated staff person. In addition, train all staff that interact with the public in techniques to communicate with those with language and/or cultural barriers.	City of Harrisonburg Harrisonburg Redevelopment and Housing Authority
Discussion: Any effort to affirmatively further fair housing can only go so far without effective and efficient investigation and enforcement of discriminatory actions. However, resources for these activities are already limited and are only becoming more so. HRHA and the City will ensure that discriminatory activity is properly investigated by a trained agency. In addition, HRHA and the City will evaluate and strive to improve the way they interact with the public in order to prevent unintentional barriers from occurring.				

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Increase the level of fair housing knowledge and understanding among housing developers, real estate professionals, elected officials, and the general public	Community opposition	Segregation/Integration Publicly Supported Housing	W Within six months, create a page on the City's website for fair housing resources. Partner with local organizations such as lending institutions, attorneys, realtors, etc. to host a fair housing community forum annually. Hold an annual fair housing training for elected officials, appointed boards, and department staff.	City of Harrisonburg Harrisonburg Redevelopment and Housing Authority
Discussion: While fair housing education and outreach are constant needs in any jurisdiction, the City and HRHA will work to improve the level of fair housing knowledge and understanding among local housing developers, real estate professionals, local elected officials, design and construction professionals, and the general public with a focus on members of the protected classes. In particular, HRHA and the City will focus on internal education and training to reduce the chances of creating impediments to fair housing within their own organizations. The City and HRHA will also partner with local organizations whose clients are hard to reach protected classes, such as NewBridges and Church World Services, to help citizens better understand their rights.				

III. Community Participation Process

1. Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP),and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board.

The community participation process undertaken for this AHF was a collaborative effort between the City of Harrisonburg and Harrisonburg Redevelopment and Housing Authority (HRHA).

From June 7-10, 2016, a series of stakeholder interviews and consultations were conducted in Harrisonburg. Over the course of these four days, approximately 30 individuals from organizations whose mission involves housing in one facet or another provided feedback. Stakeholders were identified by local staff and invited to participate personally. Those who were not able to attend a group interview were contacted later by phone. One interview was held during a regularly scheduled meeting of the Continuum of Care.

Two web-based surveys, one for the general public and one for other interested stakeholders, were posted on the City's and HRHA's websites, as well as publicized on the City's Facebook page. Each stakeholder who was invited to participate in an interview was also encouraged to share the survey with their colleagues, customers or constituents, and any other network of contact they deemed appropriate. During the six weeks the surveys were active, 68 responses were submitted.

The following public hearings were held during the course of preparing the AFH:

- June 9 – a general hearing to solicit input from the public. Information about fair housing, the City's and HRHA's obligation to affirmatively further fair housing, and preliminary data and maps were presented. The hearing was advertised in the Daily News-Record and on the City's Facebook page. No members of the public attended.
- August 9 – a joint meeting with City Council and the HRHA Board of Commissioners to present the draft AFH and begin the public display period.
- September 27 – a joint meeting for the City Council and the HRHA Board of Commissioners to officially adopt the AFH.

2. Provide a list of organizations consulted during the community participation process.

The following organizations participated during the community participation process:

- City of Harrisonburg, Department Community Development
- City of Harrisonburg, Department of Transportation
- Blue Ridge Legal Services
- Crossroads Counseling Center
- EAUS
- First Step
- Mercy House
- NewBridges Immigrant Resource Center
- Northern Shenandoah Valley Regional Commission
- Open Doors
- Rockingham County Schools
- Sentara RMH
- Strength in Peers
- United Way of Harrisonburg-Rockingham
- Valley Associates for Independent Living (VAIL)
- Valley Community Services Board
- Way to Go, Inc.

3. How successful were the efforts at eliciting meaningful community participation? If there was low participation, provide the reasons.

The response to personal invitations for interviews was satisfactory; more than half of those contacted attended a group interview or expressed an interest in participating in the process. The information obtained through the stakeholder interviews, both in-person and through follow-up telephone conversations, was excellent and invaluable in shaping the fair housing analysis.

The response rate to the online survey was high for a community the size of Harrisonburg. Over two-thirds of the responses were submitted within the first two weeks of the survey opening, with a continued tapering off of responses during the following four weeks. Keeping the survey open for a longer period of time is unlikely to have increased the response rate significantly.

The lack of attendance at the first public meeting was disappointing. To increase community participation in the future, the City and HRHA will consider more targeted advertising further in advance of public meetings, possibly by partnering with local organizations that work directly with heavily affected populations and protected classes, such as VAIL, Church World Services, etc.

The City and HRHA have started discussions with Housing Opportunities Made Equal of Virginia, Inc. (HOME) about organizing a training workshop or series of workshops for the general public. These workshops would educate community members about fair housing, their rights, and issues in Harrisonburg and Rockingham County, with the aim of increasing their capacity to participate in the process and be better advocates for themselves.

4. Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.

Stakeholder Interviews

The City and HRHA conducted a series of stakeholder interviews and a public meeting from June 7, 2016 to June 9, 2016. They met with affordable housing providers, homeless assistance providers, health and human service providers, and several municipal departments. A summary of the comments related to fair housing that were identified over the course of our meetings is included below.

Access to Opportunity

- Entry-level, low-skilled employment opportunities are available; however, these jobs are often hard to access via transit and are unsuitable for those with physical disabilities. Many retail jobs are filled by students, thereby making that section of the entry-level market much tighter for non-student households.
- There is much underemployment – employers do not always give their employees enough hours to qualify for employer-sponsored health insurance. High-deductible ($5,000-$10,000) plans are often the only plans available to these individuals and their families.
- Harrisonburg has a large refugee population. This population faces significant language and employment barriers. Educational and employment qualifications may not transfer between the U.S. and the nation of origin.
- Stakeholders reported that many new immigrants have a tendency to self-segregate into with well-established neighborhoods with residents from the same country or region.
- Inability to access medical care, including substance abuse and psychiatric care, is a barrier to achieving and sustaining employment and housing.
- Source of income discrimination is an issue – extensions are often required in order for recipients to find suitable housing that accepts Housing Choice Vouchers. Furthermore, 50% of vouchers are used outside city limits.
- Childcare facilities are in short supply for all income levels.
- A lack of access to vital paperwork such as photo identification, social security cards, birth certificates, etc. can prevent the city's homeless population from accessing employment and essential services.
- Employers do not always understand their legal obligation to make reasonable accommodations for individuals with disabilities.

Affordable Housing

- There is a lack of affordable housing within the community. Large multi-family units that are not built specifically for JMU students are particularly in short supply.
- JMU drives the rental housing market. Most new construction is higher-end and targeted to students.
- Students fill new multi-family development, making older student housing potentially available for LMI households. However, the new construction can price out the existing LMI population in some neighborhoods, limiting the availability of affordable housing stock in those locations."
- Individuals and families in need of affordable housing must often move into substandard housing in the county to be closer to employment opportunities.
- Most of the remaining available land in the city that is zoned and designated in the land use guide for residential use is zoned for single-family (detached and duplexes) and not multi-family.
- Development standards have increased over the years (e.g. sidewalks on both sides of a street, provision of pedestrian and biking facilities), which has raised project costs and reduced affordability.
- Recent cases of NIMBYism have necessitated the relocation of affordable housing projects.
- The city's homeownership rate has decreased over the past decade.

Transportation

- Public transit is designed to meet the needs of JMU students and not the LMI population. Hours, frequency, and routes are limited, especially during the summer and school holidays.
- Buses do not serve important community amenities such as the main post office or major employers.
- There are few transit options between the city and the county.
- Route information is available in English and Spanish only.
- The Harrisonburg Department of Public Transportation coordinates public buses, school buses, and paratransit.
- The City is beginning to involve the public transportation department in the development review process.

Accessibility

- Local building officials enforce federal law; however, Virginia state building codes have only recently begun to catch up to national fair housing design and accessibility standards.
- Most accessibility modifications requests come from county residents.
- The City is gradually installing sidewalks and curb cuts in older neighborhoods where they were not previously required.
- The City replaces traffic signals with APS signals when replacement or major upgrade is necessary.

Other Comments/Issues

- Although there are a few dilapidated buildings within the city, blight is not a significant issue.
- The school district has no taxing authority, making school funding a responsibility of the City.

Online Surveys

Two online surveys were developed to assess the fair housing experiences of residents and other fair housing stakeholders. The surveys were made available in English and Spanish beginning on June 6, 2016 through June 15, 2015. The surveys were advertised through the City's and HRHA's official webpages as well as departmental social media accounts and printed flyers that were distributed at in-person interviews and public meetings.

Resident Survey

A total of 43 residents completed surveys as part of the process. Residents were asked to provide basic demographic information, indicate their experience with affordable housing, and respond to various scenarios intended to discern whether or not they could identify actions that may be considered discriminatory.

Housing Characteristics

Most of those who responded to the survey (73%) indicated that they have lived at their current location for less than five years, and the vast majority were renters (80%). Most had searched for housing sometime within the past year (64%), and also indicated they had not been treated unfairly in the search for housing in the past (82%).

Four respondents had been discriminated against at least once while searching for housing in the past. It should be noted that this is a very small sample size, so only limited conclusions can be drawn from their experiences. Three listed age as a reason for discrimination; other reasons given were children in household, marital status, national origin, and race. Only two complained to a third party about the incident; one

who did nothing replied, “Decided to rent elsewhere. Do not need a bad relationship with landlord.”

Fair Housing Scenarios

Residents were presented with a series of scenarios to determine their knowledge of fair housing practices and law. Following each scenario, they were asked (1) whether they thought the actions in question were right or wrong, and (2) whether the actions in question were legal or illegal.

Scenario 1: The owner of a group of apartment buildings decides that families with young children will only be allowed to rent in one of the buildings because younger children tend to make lots of noise and may bother other tenants.
The majority of respondents (48%) indicated they did not think the owner should be able to assign families with younger children to one particular building. Most respondents were either unsure whether or not the practice is considered legal (44%) or did not feel the practice was legal (39%). (It is illegal to discriminate against families with children.)

Scenario 2: In checking references on an application for a vacant apartment, an apartment building owner learns that an applicant does not have the best housekeeping habits and does not always keep their current apartment clean and neat. The owner does not want to rent to such a person.
Most respondents (44%) indicated that the owner should be allowed to reject a potential tenant based on poor housekeeping habits. The majority of respondents also indicated they were unsure of whether or not this was a legal practice (52%), while 35% indicated they did not feel the practice was legal. (It is not illegal to discriminate against a person because of their housekeeping habits.)

Scenario 3: An apartment building owner is renting to a tenant who uses a wheelchair. The building is old and does not have a wheelchair ramp, and the tenant wants a small wooden ramp constructed at the building door to more easily access the building. The tenant volunteers to pay all costs and agrees to have the ramp removed at their own expense when they leave the apartment. The owner, however, believes such a ramp will not look good on the building, and does not allow the tenant to build the ramp on the property.
The overwhelming majority of respondents (78%) indicated that regardless of the law, the apartment owner should not be able to decide whether or not to allow a wheelchair ramp to be constructed on his property. Likewise, 74% indicated they did not believe this practice to be legal. (It is illegal to discriminate against persons with disabilities and deny them the ability to erect a ramp to access a housing unit.)

Scenario 4: 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 apartment building owner does not want to rent to such a person.
A strong majority of respondents (74%) indicated that regardless of the law, the apartment owner should not be able to reject the application due to the applicant's mental illness. The majority of respondents also indicated they did not believe this practice to be legal (65%), while 30% were unclear whether or not the practice was legal. (It is illegal to discriminate against persons with mental illness.)

Scenario 5: A white family is looking to buy a house. They go to a real estate agent and ask about the availability of houses within their price range. Assuming the family would only want to buy in areas where white people live, the agent decides to show them only houses in all-white neighborhoods, even though there are many houses in their price range in other parts of the community.
The majority of those asked (82%) indicated the real estate agent should not be able to decide to focus the search for the home in an all-White area. Respondents were more split over their understanding of whether or not the practice is legal: most indicated they did not believe it to be (52%), while 30% were unsure. (It is illegal for a real estate professional to steer a homebuyer to specific neighborhoods based on the real estate professional's personal assumptions.)

Stakeholder Survey

Fair housing stakeholders accounted for 25 survey respondents. The majority of stakeholders were affiliated with a non-profit social service provider (44%). Most were either organization staff members (72%) and held their position for fewer than five years (55%). Stakeholders were asked a series of questions regarding organizational characteristics, experience with fair housing practices and/or discrimination, and to articulate their thoughts on fair housing impediments.

Organizational Characteristics

The organizations represented provide social services (66%), manage rental properties (17%), or perform homeless assistance services (17%). Respondents were asked to identify the population segments for which services are provided. Over 73% indicated they served families and individuals who are homeless or at high risk for becoming homeless. Additionally, 53% indicated they represent people in need of supportive services to remain housed. None of the respondents represented home buyers.

Respondents indicated that the primary barriers people face in the housing market include the inability to find affordable housing to rent (94%), the inability to qualify for a rental unit due to poor/credit history (89%) or a criminal background (72%), and poor housing quality (50%).

Fair Housing/Discrimination Experience

The same number respondents have encountered someone who has experienced housing discrimination as those who have not (39%). Those who had encountered housing discrimination advised the person to seek help from a fair housing group or organization, consult with a lawyer, or file a complaint with a government agency.

The majority of respondents were not affiliated with organizations that had ever initiated legal action against persons or organizations accused of housing discrimination (72%). Stakeholders indicated that they have posted fair housing information on their website, distributed flyers or brochures with fair housing information, and trained staff to recognize housing discrimination and inform clients/consumers of the resources available to them.

Barriers to Fair Housing

Stakeholders were additionally asked open ended questions regarding impediments to fair housing. The most commonly mentioned were residents' lack of income, a lack of affordable units, and poor transit access.

Stakeholders were also asked what actions local government should undertake to remove these barriers. The most common suggestions were constructing new affordable housing units, incentives and collaborations with private landlords, and life skills and employment training for low-income residents.

Other Comments

Survey respondents had to opportunity to offer open-ended comments at the end of the survey. Of the six who did, three mentioned university students driving up prices for families and young professionals. Two mentioned the lack of affordable housing in general, and one described a situation in which a rental agent was suspected to have a racial bias.

IV. Assessment of Past Goals, Actions, and Strategies

1. Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:

a. Discuss what progress has been made toward their achievement

The following describes the goals that were included in the City's 2012 Analysis of Impediments to Fair Housing Choice and the progress that has been made toward their achievement:

- Goal: Ensure persons with limited English proficiency (LEP) have adequate access to City programs and services.
    - The City's website features a Google Translate plugin to improve access for LEP individuals. Informational materials regarding local public transit is available in English and Spanish. The City regularly funds nonprofit organizations who serve LEP populations, such as NewBridges, IIHHS Suitcase Clinic, Mercy House, Salvation Army, Big Brothers Big Sisters, Our Community Place, and Blue Ridge Legal Services.
    - Harrisonburg Redevelopment and Housing Authority (HRHA) uses Language Line to address the diverse language needs within the community.
- Goal: Increase representation of members of the protected classes among appointed boards and commissions involved in housing matters.
    - The City's CDBG staff has had discussions with City officials about the possibility of developing an informational campaign to promote residents, including members of the protected classes, participating in local government by submitting applications to serve on boards and commissions. Opportunities to participate in both paid and unpaid local government positions are posted on the City's website, in City buildings, and on the local government television channel.
    - City Council has become more racially diverse since the last AI.

- Goal: Expand the supply of affordable housing that is accessible to persons with disabilities.
    - The City allocated a portion of its CDBG funds for purchasing ramps to provide accessible entrances to homes for individuals with disabilities. This project was cancelled due to a lack of demand.
    - HRHA gives preference to individuals with disabilities in its admissions process and has a written policy for granting reasonable accommodations. Additionally, HRHA is in the process of constructing a 30-unit permanent supportive housing development for individuals with mental and physical disabilities.
- Goal: Create affordable homeownership and financial education opportunities for lower income homebuyers, particularly minorities.
    - CDBG staff discussed with HRHA the possibility of beginning a program for first time homebuyers that includes down payment assistance. The City has not used CDBG funds for this type of project in the past.
    - In February 2016, HRHA presented the results of its most recent housing study and proposed to the City the development of a taskforce to assist in the creation of a homeownership program that targets lower income homebuyers and City employees. The presentation was well received by the Council and it is planned that the taskforce will be implemented in the fall of 2016.
- Goal: Improve and preserve the City's existing affordable housing stock.
    - During the 2014-2015 program year, the City continued its annual allocation of $140,000 to HRHA to pay the debt service on previous loans received to assist in the rehabilitation of 40 public housing units in the Harrison Heights complex.
    - The City's CDBG staff continues to research the feasibility of developing, in tandem with HRHA staff and City Community Planning and Development, proposals for consideration by Council that would improve and preserve the City's existing affordable housing stock. These proposals could incentivize affordable housing development by waiving permitting and other fees. Additionally, staff continues to consider proposals for mixed-income developments by providing incentives such as higher density bonuses to nonprofit developers who agree to set-aside at least 10% of the units as affordable. Final consideration of any proposal by staff would be made by the City Planning Commission and ultimately City Council.

- Goal: Enhance the level of fair housing education, outreach, and enforcement provided in order to decrease discriminatory behavior in the City's housing market.
    - The City has begun communication with Piedmont Housing Alliance to determine the feasibility of conducting paired testing for both race and disability in Harrisonburg's rental housing market.
    - The City and HRHA have partnered to provide annual fair housing seminars to the community.
- Goal: Improve the availability of fair housing information and education to City residents.
    - The City allocates a portion of its CDBG funds for fair housing outreach and education on an annual basis. These activities include the modification and dissemination of educational materials regarding fair housing choice, the display of posters around the City, and conducting fair housing seminars for the community.
- Goal: Expand home ownership opportunities for members of the protected classes.
    - CDBG staff has discussed with HRHA the possibility of beginning a program for first time homebuyers that includes down payment assistance. The City has not used CDBG funds for this type of project in the past.

b. Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences)

- Goal: Ensure persons with limited English proficiency (LEP) have adequate access to City programs and services.
    - Due to the wide range of languages spoken by Harrisonburg's large refugee population (more than 50 foreign languages are represented in the Harrisonburg school system), securing translation and interpretation services for every language group is time- and cost-prohibitive. The City had become more committed to providing translation services when requested.
- Goal: Increase representation of members of the protected classes among appointed boards and commissions involved in housing matters.
    - Appointment to boards and commissions is generally a political matter, which makes it difficult to ensure that the representation of the protected classes actually increases. However, the City has seen an

increase in diversity among council, boards, and commissions over recent years.

- Goal: Expand the supply of affordable housing that is accessible to persons with disabilities.
    - The City allocated a portion of its CDBG funds for purchasing ramps to provide accessible entrances to homes for individuals with disabilities, and has historically funded organizations that conduct similar activities. However, these organizations stated in stakeholder interviews that the constraints and compliance requirements of the CDBG program (particularly the environmental review process) are so burdensome that they no longer apply for these funds.
- Goal: Create affordable homeownership and financial education opportunities for lower income homebuyers, particularly minorities.
    - CDBG staff has discussed with HRHA the possibility of beginning a program for first-time homebuyers that includes down payment assistance. The City has not used CDBG funds for this type of project in the past, primarily due to a lack of staff capacity to manage such a program and a lack of nonprofit organizations willing to take on this work.
- Goal: Improve and preserve the City's existing affordable housing stock.
    - The City's CDBG staff continues to promote efforts to improve and preserve the existing affordable housing stock. However, the City lacks the staff capacity to manage a housing rehabilitation program, and there are few nonprofit organizations that are willing to take on this work. Nonprofits are often hesitant to apply for CDBG funds because of the program's constraints and compliance requirements.
- Goal: Enhance the level of fair housing education, outreach and enforcement provided in order to decrease discriminatory behavior in the City's housing market.
    - The City is in the process of coordinating paired testing activities. However, because there is no local HUD-certified organization to perform this work, the high costs of contracting with an organization from outside of the region has served as a substantial barrier for the City to conduct this work in the past.
- Goal: Improve the availability of fair housing information and education to City residents.
    - The City continues to allocate a portion of its CDBG funds for fair housing outreach and education on an annual basis. These activities include the modification and dissemination of educational materials

regarding fair housing choice, the display of posters around the City, and planning fair housing seminars.

- Goal: Expand home ownership opportunities for members of the protected classes.
    - CDBG staff has discussed with HRHA the possibility of beginning a program for first-time homebuyers that includes down payment assistance. The City has not used CDBG funds for this type of project in the past, primarily due to limited staff capacity to manage such a program and a lack of nonprofit organizations willing to take on this work.

c. Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced.

Additional policies, actions, or steps that could be taken to mitigate the problems outlined above include:

- Use funding to hire a HUD-certified organization to conduct a series of housing discrimination paired testing for both race and disability in Harrisonburg's rental housing market.
- Continue to seek out and partner with nonprofit organizations focused on housing access for people with disabilities, such as VAIL.
- Continue to work with organizations that provide supportive services to individuals with limited English proficiency and protected classes by conducting outreach and education concerning volunteering for City boards and commissions.
- Consider a broader regional approach to expand affordable homeownership.

d. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.

The City and HRHA experienced difficulty achieving goals that were beyond their financial and staffing capacity or too reliant on the actions of other entities. For example, achieving the goal of proportional representation on boards and commissions depends on the preferences of City residents and elected officials, which is not something the City can control. Consequently, the City's financial and staffing resources were more heavily taken into consideration when defining the goals for this AFH.

Several past goals were included in this AFH based on their continued relevance to fair housing issues within Harrisonburg. However, metrics and timelines were specified for each goal to improve the City's and HRHA's ability to demonstrate and achieve progress.

V. Fair Housing Analysis

A. Demographic Summary

1. Describe demographic patterns in the jurisdiction and region, and describe trends overtime (since 1990).

Thomas Harrison, the son of English immigrants, brought his family to settle in the Shenandoah Valley in 1737. By 1778 the Harrison family had laid claim to land in the area that is now Harrisonburg and part of Rockingham County. Harrison built a home on Bruce Street that is still standing today. The Commonwealth of Virginia officially organized Rockingham County in 1778.

The following year Harrison deeded two and a half acres of his overall holdings to the new county, which used the property to build the first courthouse on what is still Court Square. The next year an additional 50 acres were added from the Harrison holdings to the two and a half acres and Harrisonburg was recognized as the county seat of Rockingham. In 1780, the city limits were Federal Street to the east, Bruce Street to the south, High Street to the west and Wolfe Street to the north.

War came to the valley and to Harrisonburg between 1861 and 1864. The City was passed through by both Union and Confederate troops. On June 20, 1862 the fence around the courthouse was used as a stockade to hold Union soldiers taken prisoner in the Battle of Cross Keys. The war was a tense time in the City. Turner Ashby, a noted cavalry officer was killed close to the town's borders. While Harrisonburg and Virginia were part of the Confederacy, the City of Harrisonburg's representatives in Richmond opposed secession.

Another 1,082 acres were added to the City in 1892 through annexation. The move increased the population of Harrisonburg by three times to about 2,000 total residents. The next year the town elected trustees to work with the Superintendent of Public Instruction to form a public school system. The Virginia General Assembly established the State Normal and Industrial School for Women at Harrisonburg in 1908. The school became the State Teachers College in 1924 and was renamed Madison College in 1938. In 1977 the college took on the name of James Madison University (JMU).

1912 saw the founding of Rockingham Memorial Hospital (RMH). The hospital serves a five county area spanning the Shenandoah Valley and parts of West Virginia. In 1994, RMH added a regional cancer center to its list of services to the community.

In 1916, Harrisonburg was incorporated as an independent city. Four years later, the 1920 census recorded the population of Harrisonburg as 5,875.

What would become Eastern Mennonite University (EMU) was founded in 1917 as the Eastern Mennonite School. The school became a four-year degree conferring institution in 1947. EMU now has an active graduate school along with undergraduate and adult degree programs.

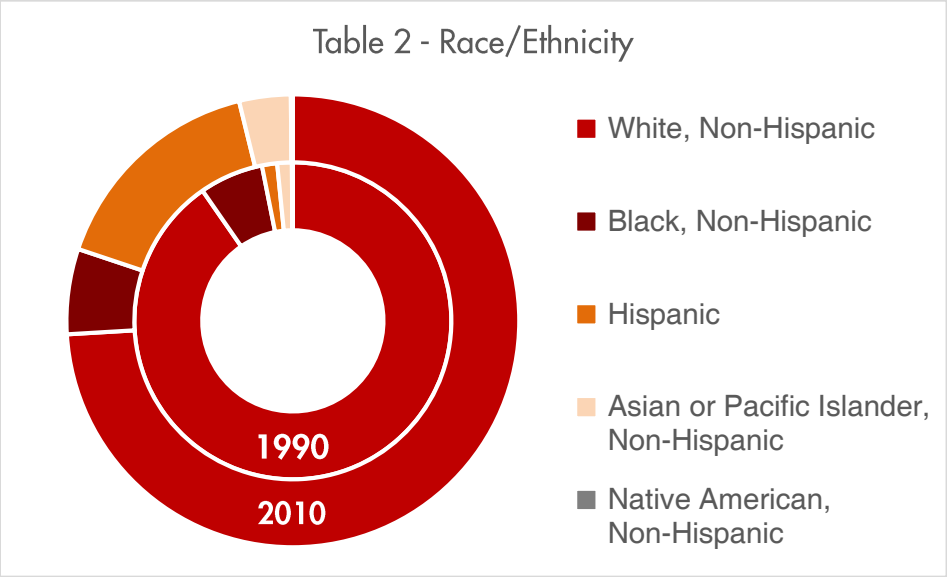
Through annexations in 1937, 1938, and 1950 about 320 acres were added to the City and two small annexations in 1965 and 1970 brought the total land in Harrisonburg to nearly six square miles. The 1970 census recorded Harrisonburg's population as 19,700.

The last annexation of land by the City was in 1982 when 11.64 square miles were added, bringing the City to 17.394 square miles or 11,132.16 acres.

Race and Ethnicity

The population of Harrisonburg is primarily White, with non-White residents accounting for around 28% of City residents. Hispanic residents are the largest minority group, followed by Blacks, and then Asians. The Harrisonburg Metropolitan Statistical Area (MSA), which consists of the City and Rockingham County, is less diverse than the City, with 16% of residents being non-White.

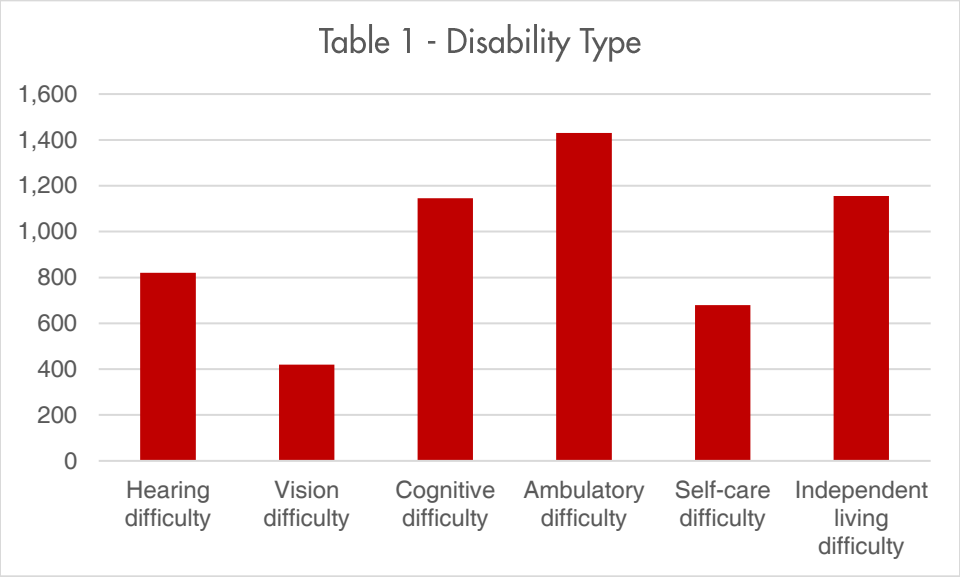
The population of Harrisonburg has changed significantly in the past 20 years. Between 1990 and 2010, the non-White population increased over fourfold, from 10% to 28%. Hispanics were a major driver of this change, growing by a factor of 16.



The growing Hispanic population is influenced by foreign-born residents' countries of origin, the most common being Mexico, Honduras, El Salvador, and the Dominican Republic for both the City and the region. Overall, Harrisonburg's foreign-born population has grown from 2.4% in 1990 to almost 15% in 2010 (and from 1.6% to 8.8% in the region). Likewise, residents with limited English proficiency, most of whom speak Spanish, have increased from 1.8% to 10.9%.

Disability

Across Harrisonburg, 11.8% of residents reported a disability in 2010. The most common type of disability was an ambulatory disability involving difficulty moving from place to place. Persons with ambulatory disabilities, which affect 3.1% of Harrisonburg residents, often require housing with accessibility features. The next most common disabilities are independent living and cognitive difficulties. This same pattern holds true for the region.



Families with Children

Families with children comprise about 47% of families in the City, up from 44% in 1990, although slightly off from a peak of 47.5% in 2000. Family households in Harrisonburg are more likely to have children than family households in the greater MSA.

Table 1 – Demographics						
	(Harrisonburg, VA CDBG) Jurisdiction			(Harrisonburg, VA CBSA) Region		
Race/Ethnicity		**#**	**%**		**#**	**%**
White, Non-Hispanic		35,391	72.35		105,031	83.87
Black, Non-Hispanic		2,911	5.95		4,127	3.30
Hispanic		7,665	15.67		11,741	9.38
Asian or Pacific Islander, Non-Hispanic		1,759	3.60		2,221	1.77
Native American, Non-Hispanic		67	0.14		150	0.12
Other, Non-Hispanic		112	0.23		156	0.12
National Origin	**Country**	**#**	**%**	**Country**	**#**	**%**
#1 country of origin	Mexico	1,296	2.65	Mexico	2,558	2.04
#2 country of origin	Honduras	953	1.95	Honduras	1,116	0.89
#3 country of origin	El Salvador	518	1.06	El Salvador	660	0.53
#4 country of origin	Dominican Republic	469	0.96	Dominican Republic	542	0.43
#5 country of origin	Iraq	398	0.81	Iraq	507	0.40
#6 country of origin	China excl. Hong Kong & Taiwan	331	0.68	Uruguay	403	0.32
#7 country of origin	Guatemala	234	0.48	Ukraine	389	0.31
#8 country of origin	Cuba	231	0.47	China excl. Hong Kong & Taiwan	363	0.29
#9 country of origin	Russia	210	0.43	Guatemala	330	0.26
#10 country of origin	Uruguay	204	0.42	Russia	279	0.22
Limited English Proficiency (LEP) Language	**Language**	**#**	**%**	**Language**	**#**	**%**
#1 LEP Language	Spanish	3,847	8.11	Spanish	5,504	4.40
#2 LEP Language	Arabic	366	0.77	Arabic	404	0.32
#3 LEP Language	Chinese	259	0.55	Russian	338	0.27
#4 LEP Language	African	200	0.42	Chinese	259	0.21
#5 LEP Language	Other Indo-European Language	162	0.34	Other Indo-European	215	0.17
#6 LEP Language	Russian	145	0.31	African	206	0.16
#7 LEP Language	Japanese	73	0.15	Other Slavic language	151	0.12
#8 LEP Language	French	50	0.11	Japanese	100	0.08
#9 LEP Language	Other Slavic Language	48	0.10	Italian	57	0.05
#10 LEP Language	Korean	36	0.08	Vietnamese	54	0.04

Disability Type		#	%		#	%
Hearing difficulty		821	1.76		3,410	2.88
Vision difficulty		420	0.90		1,951	1.65
Cognitive difficulty		1,145	2.45		4,217	3.56
Ambulatory difficulty		1,430	3.07		6,440	5.43
Self-care difficulty		679	1.46		2,714	2.29
Independent living difficulty		1,155	2.48		4,657	3.93
Sex		**#**	**%**		**#**	**%**
Male		22,798	46.61		60,275	48.13
Female		26,116	53.39		64,953	51.87
Age		**#**	**%**		**#**	**%**
Under 18		7,348	15.02		25,420	20.30
18-64		37,533	76.73		83,811	66.93
65+		4,033	8.25		15,997	12.77
Family Type		**#**	**%**		**#**	**%**
Families with children		3,534	47.03		12,185	42.55

Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families.

Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.

Note 3: Data Sources: Decennial Census; ACS

Note 4: Refer to the Data Documentation for details (www.hudexchange.info).

Table 2 - Demographic Trends												
	(Harrisonburg, VA CDBG) Jurisdiction						(Harrisonburg, VA CBSA) Region					
	1990		2000		2010		1990		2000		2010	
Race/Ethnicity	#	%	#	%	#	%	#	%	#	%	#	%
White, Non-Hispanic	27,579	90.15	32,384	80.07	35,391	72.35	83,559	94.73	96,342	89.04	105,031	83.87
Black, Non-Hispanic	1,990	6.50	2,540	6.28	2,911	5.95	2,856	3.24	3,525	3.26	4,127	3.30
Hispanic	473	1.55	3,573	8.83	7,665	15.67	1,013	1.15	5,789	5.35	11,741	9.38
Asian or Pacific Islander, Non-Hispanic	454	1.48	1,620	4.01	1,759	3.60	584	0.66	1,885	1.74	2,221	1.77
Native American, Non-Hispanic	29	0.09	122	0.30	67	0.14	71	0.08	313	0.29	150	0.12
National Origin												
Foreign-born	739	2.42	3,731	9.23	7,321	14.97	1,417	1.61	5,956	5.50	10,972	8.76
LEP												
Limited English Proficiency	537	1.76	2,924	7.23	5,337	10.91	956	1.08	4,851	4.48	7,606	6.07
Sex												
Male	14,234	46.54	19,230	47.55	22,798	46.61	42,655	48.37	52,547	48.57	60,275	48.13
Female	16,353	53.46	21,208	52.45	26,116	53.39	45,534	51.63	55,646	51.43	64,953	51.87
Age												
Under 18	4,798	15.69	6,913	17.10	7,348	15.02	18,894	21.42	24,117	22.29	25,420	20.30
18-64	22,608	73.91	29,782	73.65	37,533	76.73	58,487	66.32	70,919	65.55	83,811	66.93
65+	3,181	10.40	3,742	9.25	4,033	8.25	10,808	12.26	13,157	12.16	15,997	12.77
Family Type												
Families with children	2,479	44.32	1,604	47.50	3,534	47.03	9,622	43.97	7,595	44.39	12,185	42.55

Note 1: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.
Note 2: Data Sources: Decennial Census; ACS
Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

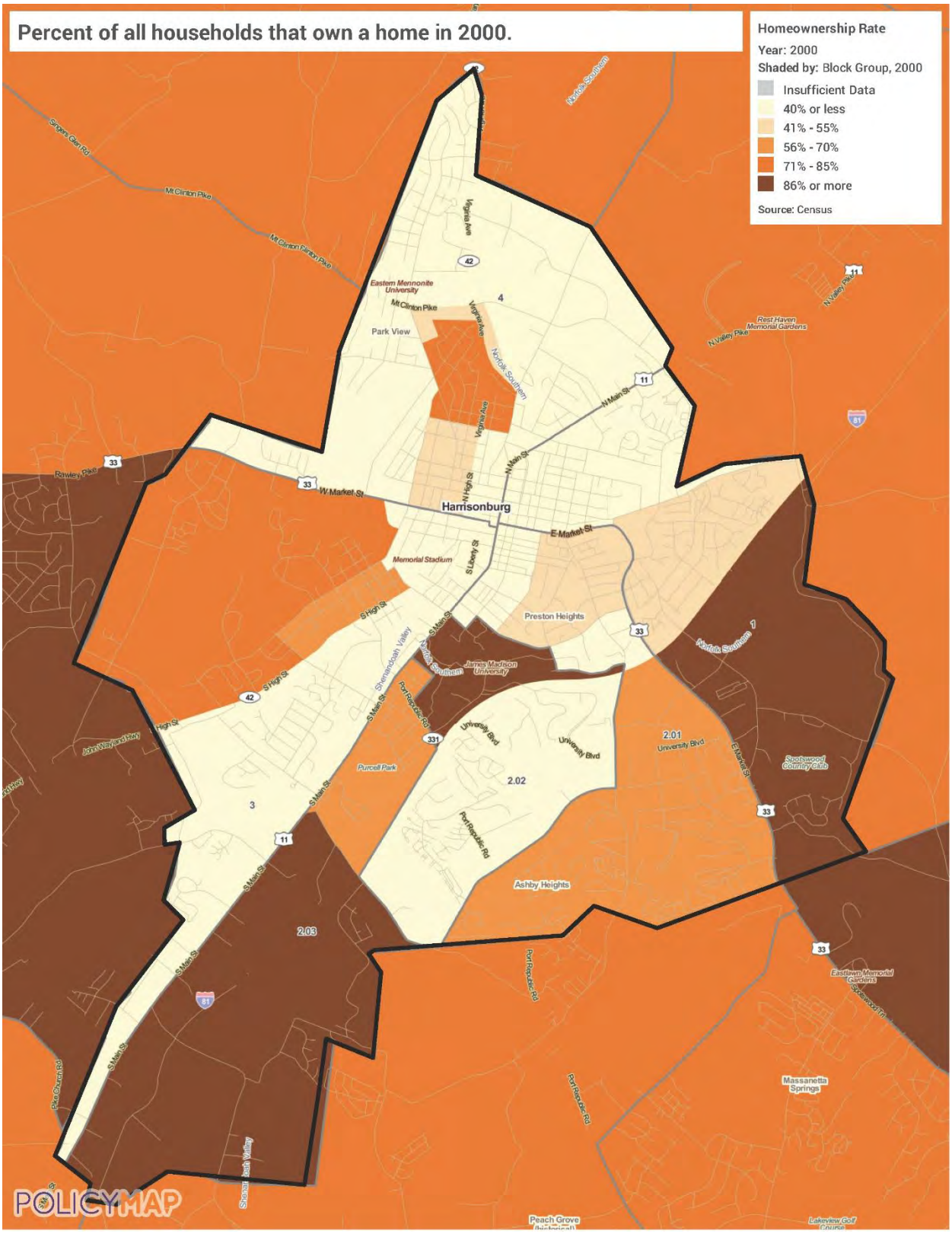
2. Describe the location of homeowners and renters in the jurisdiction and region, and describe trends over time.

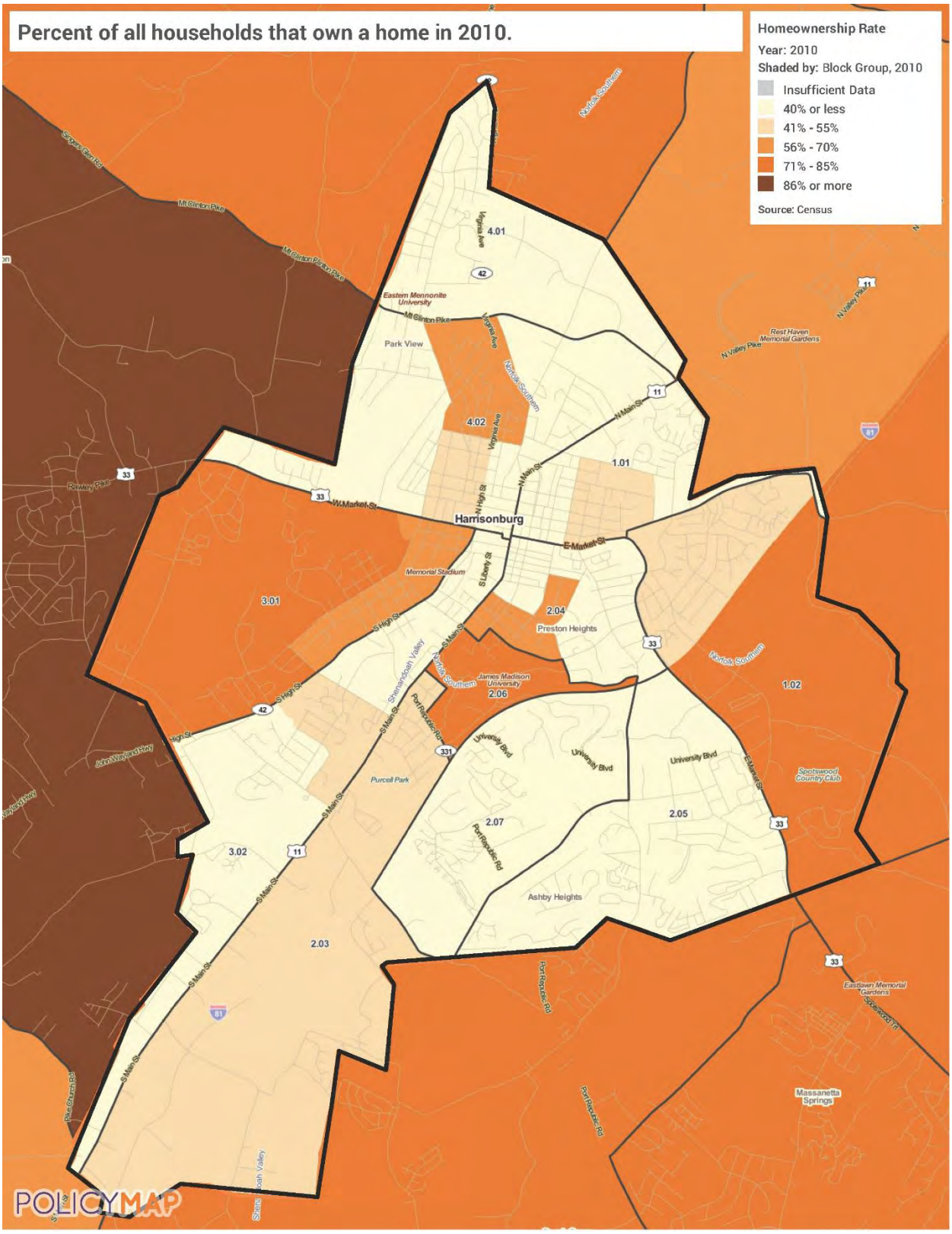
The homeownership rate in Harrisonburg remained flat at around 38% between 2000 and 2010. Similarly, the areas of high homeownership and high renter occupancy within the City have remained relatively unchanged in location if not always in degree.

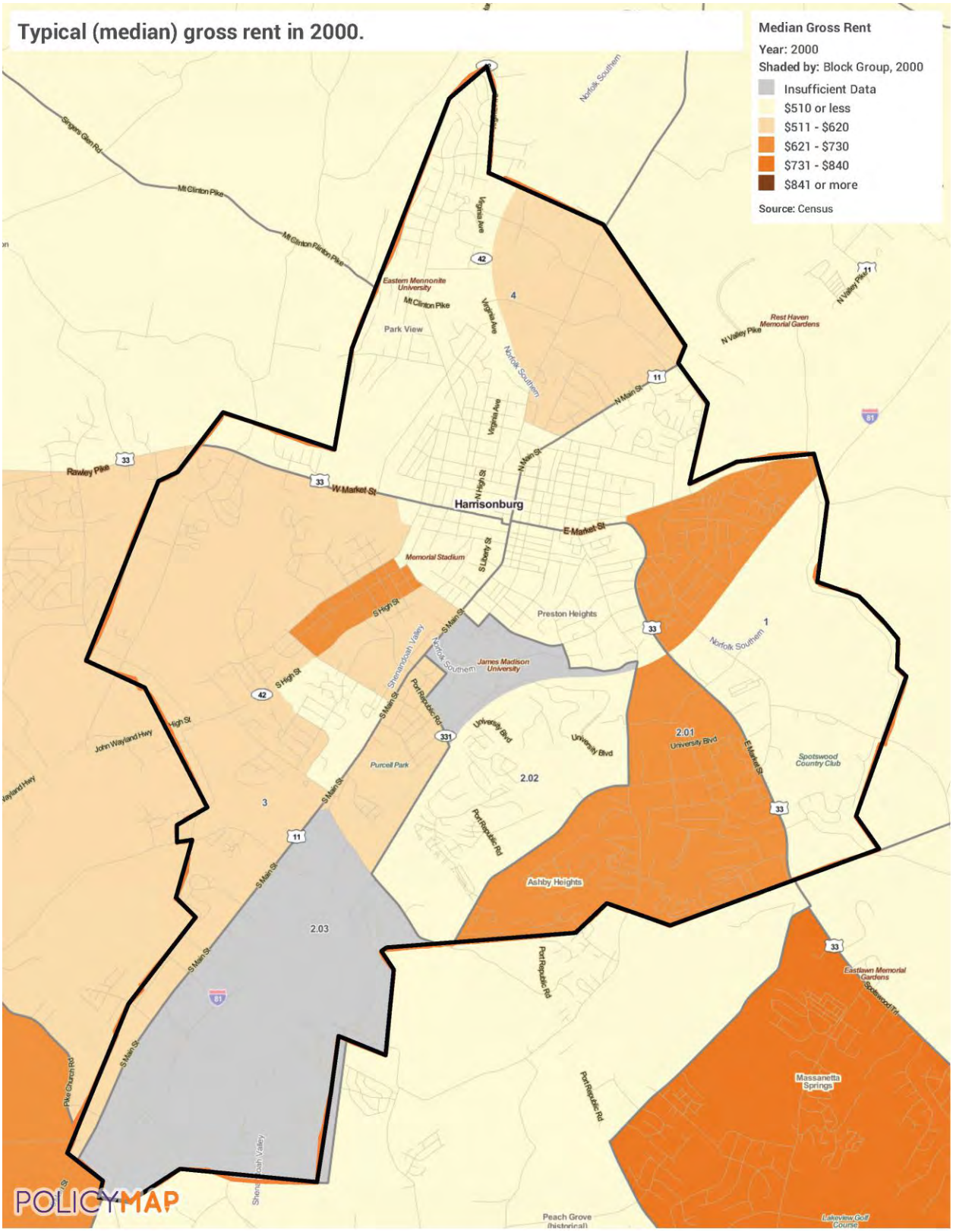
Overall, the rate of homeownership is higher in Rockingham County outside the City boundaries. Within the City, households on the eastern edge (around Spotswood Country Club) and the western edge (around the Sunrise Heights neighborhood) are more likely to own their homes. Waterman and southern Harrisonburg east of Main Street also had higher rates of homeownership in 2000, but closer to mid-range rates by 2010.

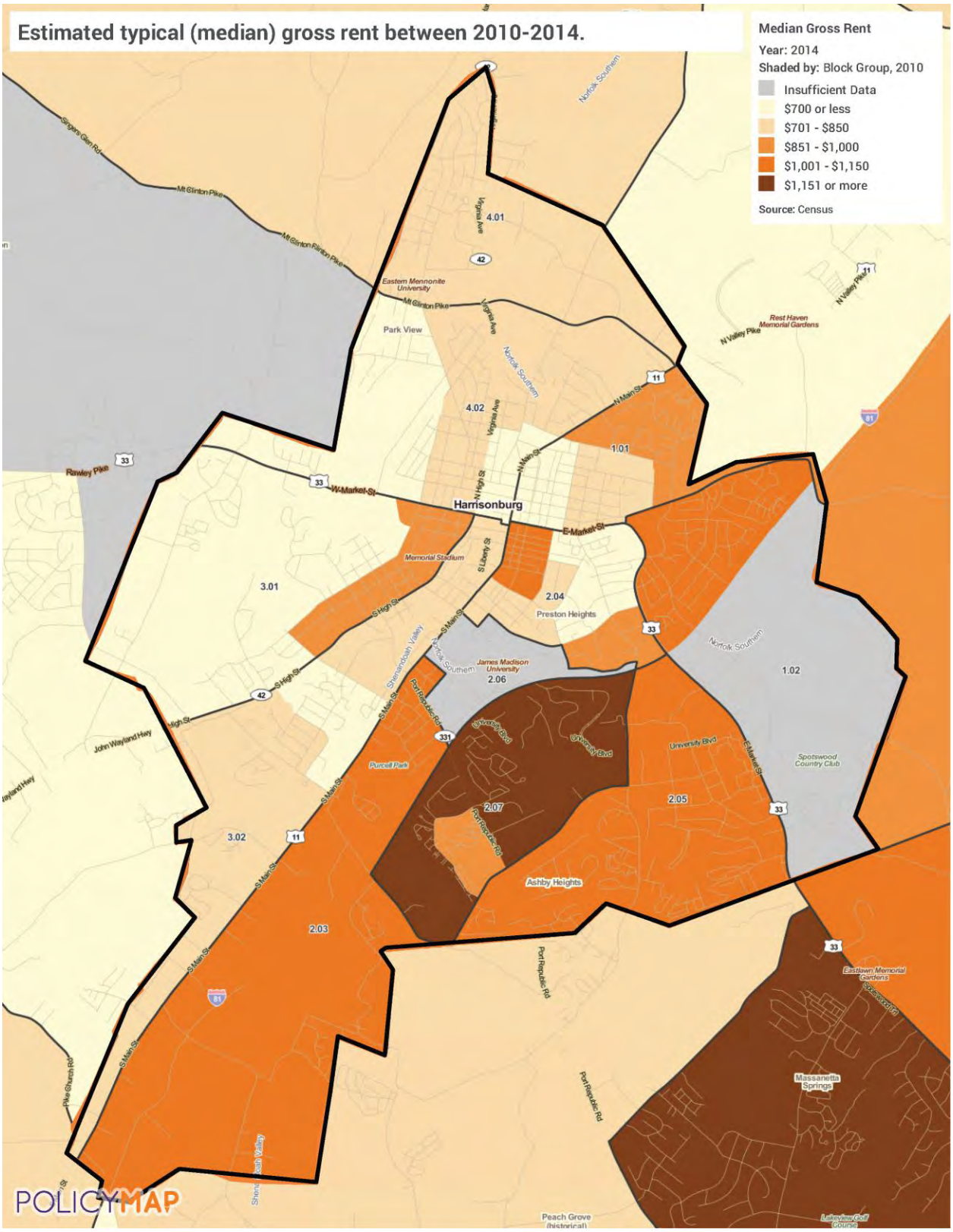
Census tract 2.06, which contains James Madison University's main campus, also has a very high homeownership rate, but this is likely an anomaly due to the limited, non-dormitory housing stock.

The areas that have seen the highest increase in rents between 2000 and 2014 are the central (2.04) and southern (20.3, 2.07, and 2.05) census tracts. Tract 2.07 in particular experienced the most dramatic loss of affordable housing, transforming from among the most affordable areas in 2000 to among the most expensive in 2014. Today, the most affordable rental units are available in the northern and western parts of the City.


Percent of all households that own a home in 2000.
Homeownership Rate
Year: 2000
Shaded by: Block Group, 2000
Insufficient Data
40% or less
41% - 55%
56% - 70%
71% - 85%
86% or more
Source: Census
Harrisonburg
Eastern Mennonite University
Park View
Memorial Stadium
Preston Heights
James Madison University
Purcell Park
Ashby Heights
Massanetta Springs
Rest Haven Memorial Gardens
Spotswood Country Club
Eastlawn Memorial Gardens
Peach Grove
Lakeview Golf Course
POLICYMAP


Percent of all households that own a home in 2010.
Homeownership Rate
Year: 2010
Shaded by: Block Group, 2010
Insufficient Data
40% or less
41% - 55%
56% - 70%
71% - 85%
86% or more
Source: Census
Harrisonburg
Park View
Preston Heights
Ashby Heights
Purcell Park
Memorial Stadium
Eastern Mennonite University
James Madison University
Rest Haven Memorial Gardens
Spotswood Country Club
Eastlawn Memorial Gardens
Massanetta Springs
4.01
4.02
1.01
3.01
2.04
2.06
1.02
3.02
2.03
2.07
2.05
POLICYMAP


Typical (median) gross rent in 2000.
Median Gross Rent
Year: 2000
Shaded by: Block Group, 2000
Insufficient Data
$510 or less
$511 - $620
$621 - $730
$731 - $840
$841 or more
Source: Census
Harrisonburg
Eastern Mennonite University
Park View
Rest Haven Memorial Gardens
Memorial Stadium
Preston Heights
James Madison University
Purcell Park
Spotswood Country Club
Ashby Heights
Eastlawn Memorial Gardens
Massanetta Springs
Lakeview Golf Course
Peach Grove (historical)
Rawley Pike
W Market St
E Market St
N Main St
S Main St
N High St
S High St
S Liberty St
Virginia Ave
Mt Clinton Pike
N Valley Pike
John Wayland Hwy
Port Republic Rd
University Blvd
Norfolk Southern
Shenandoah Valley
Pike Church Rd
Spotswood Trl
4
3
2.02
2.03
2.01
1
POLICYMAP


Estimated typical (median) gross rent between 2010-2014.
Median Gross Rent
Year: 2014
Shaded by: Block Group, 2010
Insufficient Data
$700 or less
$701 - $850
$851 - $1,000
$1,001 - $1,150
$1,151 or more
Source: Census
Harrisonburg
4.01
4.02
1.01
3.01
2.04
Preston Heights
2.06
1.02
2.05
2.07
3.02
2.03
Ashby Heights
Eastern Mennonite University
Park View
Rest Haven Memorial Gardens
Memorial Stadium
James Madison University
Spotswood Country Club
Purcell Park
Massanetta Springs
Eastlawn Memorial Gardens
Peach Grove (historical)
Mt Clinton Pike
Rawley Pike
W Market St
E Market St
N Main St
S Main St
S High St
N High St
S Liberty St
Virginia Ave
Norfolk Southern
Shenandoah Valley
Port Republic Rd
University Blvd
John Wayland Hwy
N Valley Pike
POLICYMAP

B. General Issues

i. Segregation/Integration

1. Analysis

a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.

The dissimilarity index measures the degree to which two racial or ethnic groups are evenly distributed across a geographic area and is commonly used for assessing residential segregation between two racial or ethnic groups. Dissimilarity index values between 0 and 39 generally indicate low segregation, values between 40 and 5 4 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation.

Context is important in interpreting the dissimilarity index. The index does not indicate spatial patterns of segregation, only the relative degree of segregation; and, for populations that are small in absolute numbers, the dissimilarity index may be high even if the group's members are evenly distributed throughout the area. Since White residents are the majority in Harrisonburg, all other racial and ethnic groups were compared to the White population as a baseline.

In 2010, the dissimilarity indices for all non-White groups in Harrisonburg were principally at the upper end of the “low” range. This means that non-White groups in the City are minimally segregated from Whites. Hispanics are again driving this trend, with a dissimilarity index higher than all non-White groups combined. Asians are the least segregated with an index score less than half the score for Hispanics.

Overall in Harrisonburg, the level of segregation of racial and ethnic minorities corresponds to the group’s size. That is, groups with a higher population are more segregated than low population groups.

Table 3 - Racial/Ethnic Dissimilarity Trends

	(Harrisonburg, VA CDBG) Jurisdiction			(Harrisonburg, VA CBSA) Region		
Racial/Ethnic Dissimilarity Index	**1990**	**2000**	**2010**	**1990**	**2000**	**2010**
Non-White/White	21.177	16.67	29.25	36.44	38.22	41.60
Black/White	28.07	17.19	26.54	45.02	40.91	39.82
Hispanic/White	12.13	24.70	38.31	28.42	40.59	47.97
Asian or Pacific Islander/White	8.34	14.45	15.31	45.04	52.52	48.83

Note 1: Data Sources: Decennial Census

Note 2: Refer to the Data Documentation for details (www.hudexchange.info).

b. Explain how these segregation levels have changed over time (since 1990).

The dissimilarity index has fluctuated over time for various groups in the City and in the region. For Blacks and non-Whites overall, segregation decreased between 1990 and 2000 before increasing again in 2010.

By contrast, the dissimilarity index for Hispanics, the fastest growing group in the City, has increased significantly from very low to moderate since 1990. This indicates that even though the Hispanic population is growing, Hispanic residents are likely locating in areas where Hispanics households already live.

Just as the Harrisonburg region has fewer non-Whites than the City, every racial and ethnic group is more segregated in the MSA than within the City.

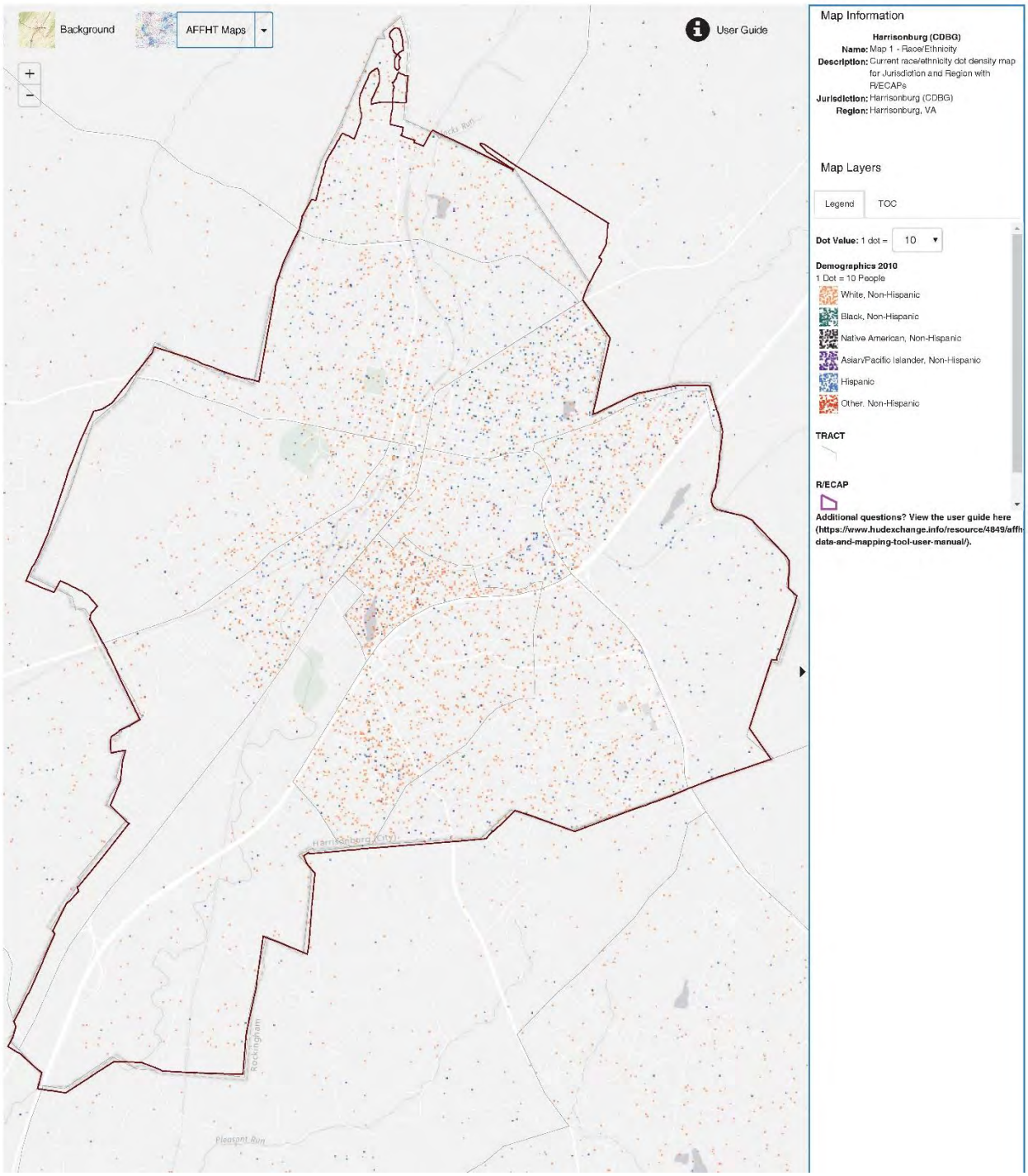
c. Identify areas with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.

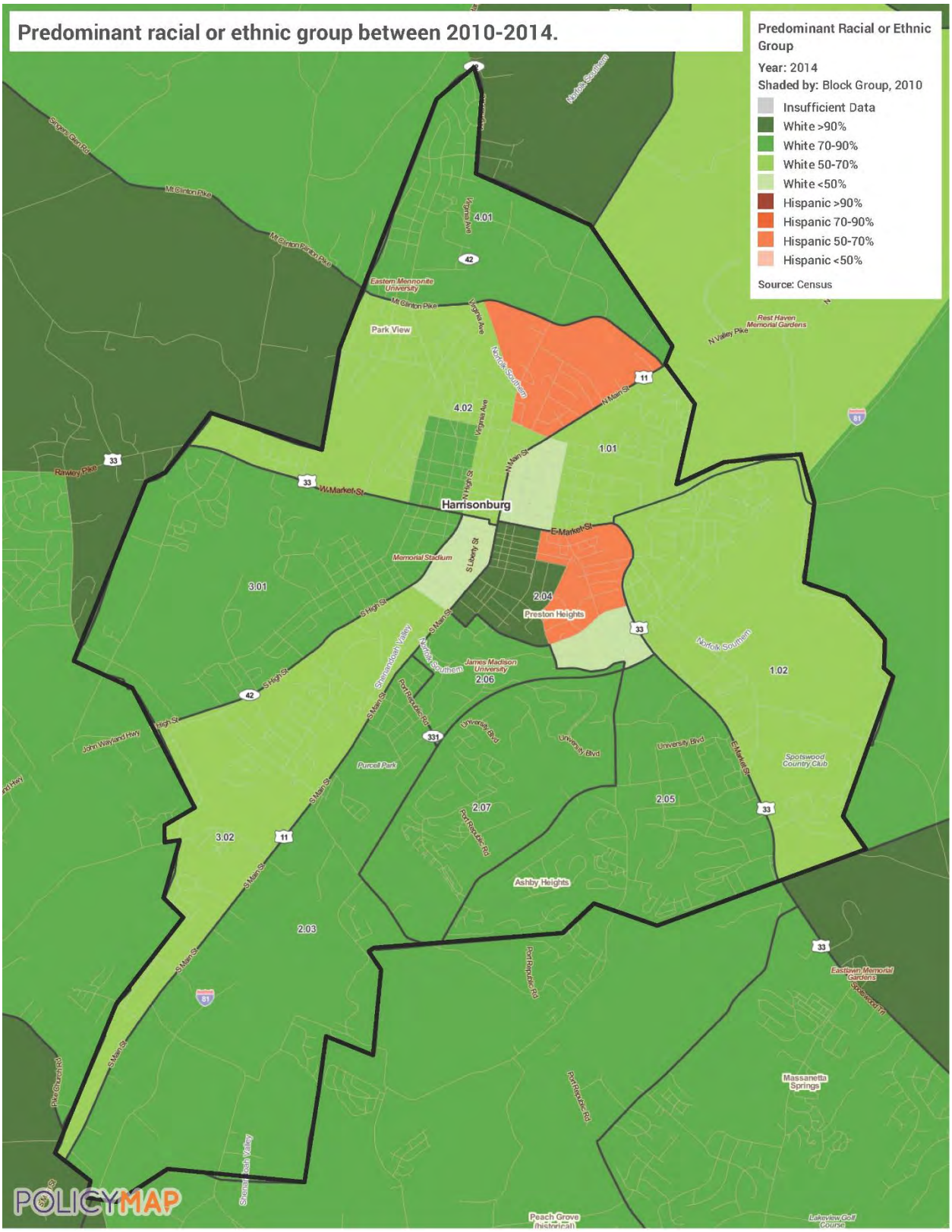
The Downtown/Old Town/Reservoir area (census tract 2.04) contains some of the most densely populated neighborhoods in Harrisonburg. They are also among the most segregated, with block groups that are highly predominantly White or Hispanic. The north/northeastern part of the City (tracts 4.02 and 1.01) also has a high concentration of Hispanic residents compared to other groups.

The eastern (tract 1.02) and southwestern (tract 3.02) sections of the City have high percentages of foreign-born residents and appear to be relatively well-integrated. By comparison, the Old Town/Reservoir area (tract 2.04), while also containing a large number of foreign-born residents, seems to be one of the most segregated parts of the City. Very few Mexican residents live here compared to the other top national groups, even though other sections of the City have large Mexican communities.

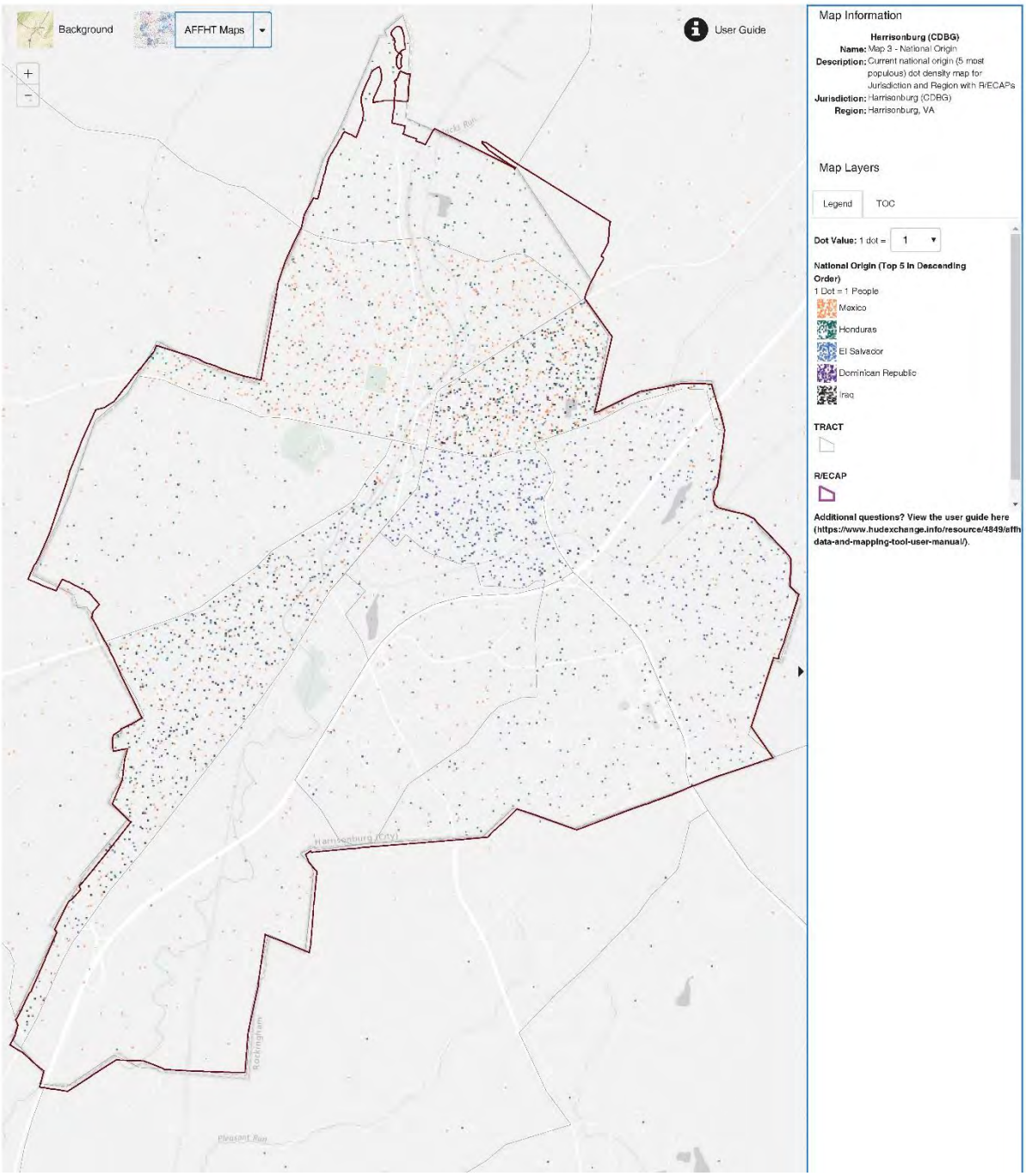
The southeastern part of the City (tracts 1.02, 2.03, 2.05, and 2.07) and the northern part west of Main Street (tracts 3.01, 4.01, and 4.02) contain almost no individuals with LEP who speak a language other than Spanish. Other parts of the City – such as the northeast (tract 1.01), central (tract 2.04), and southwest (tract 3.02) neighborhoods – have much more integrated LEP populations with more even representation among the top five languages spoken.

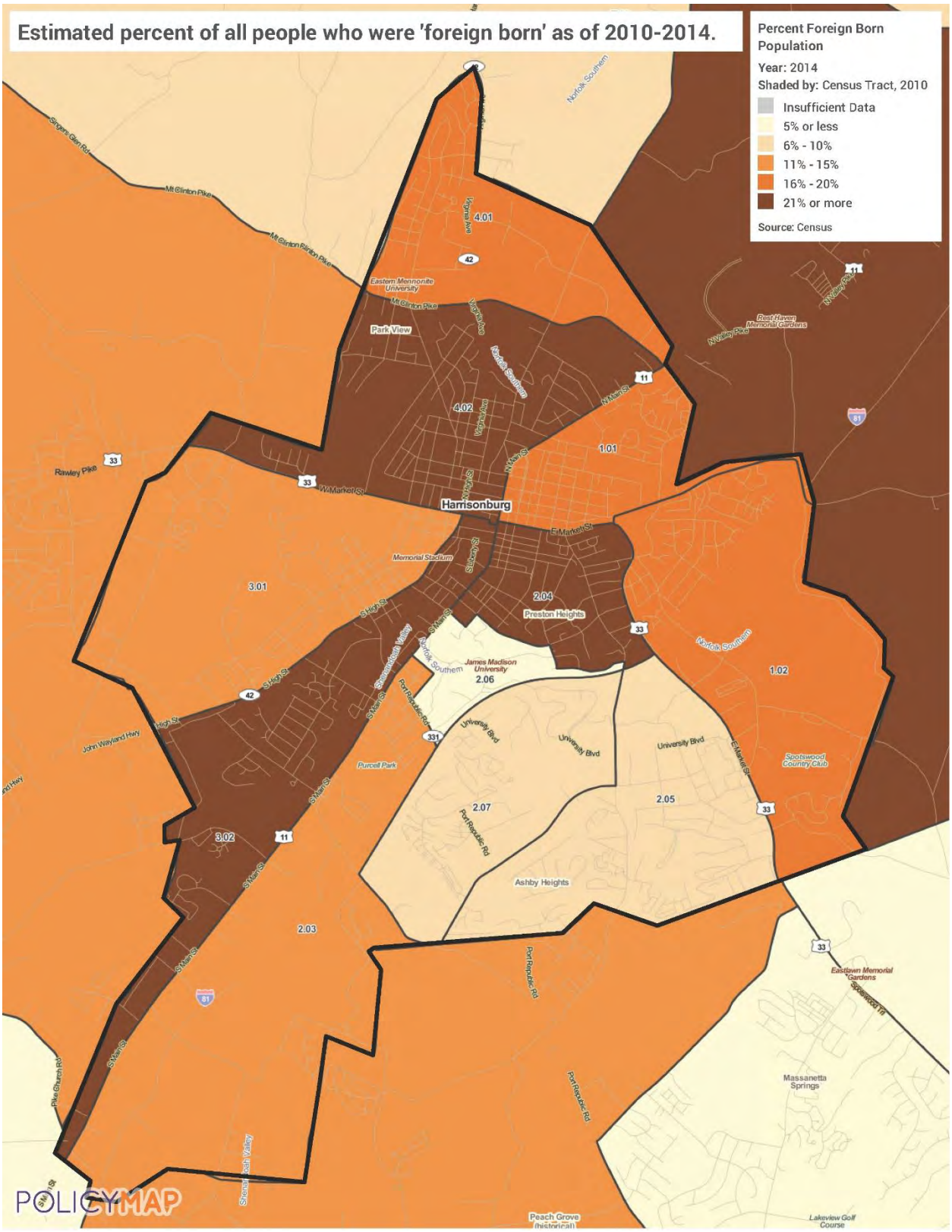
Map 1 – Race/Ethnicity



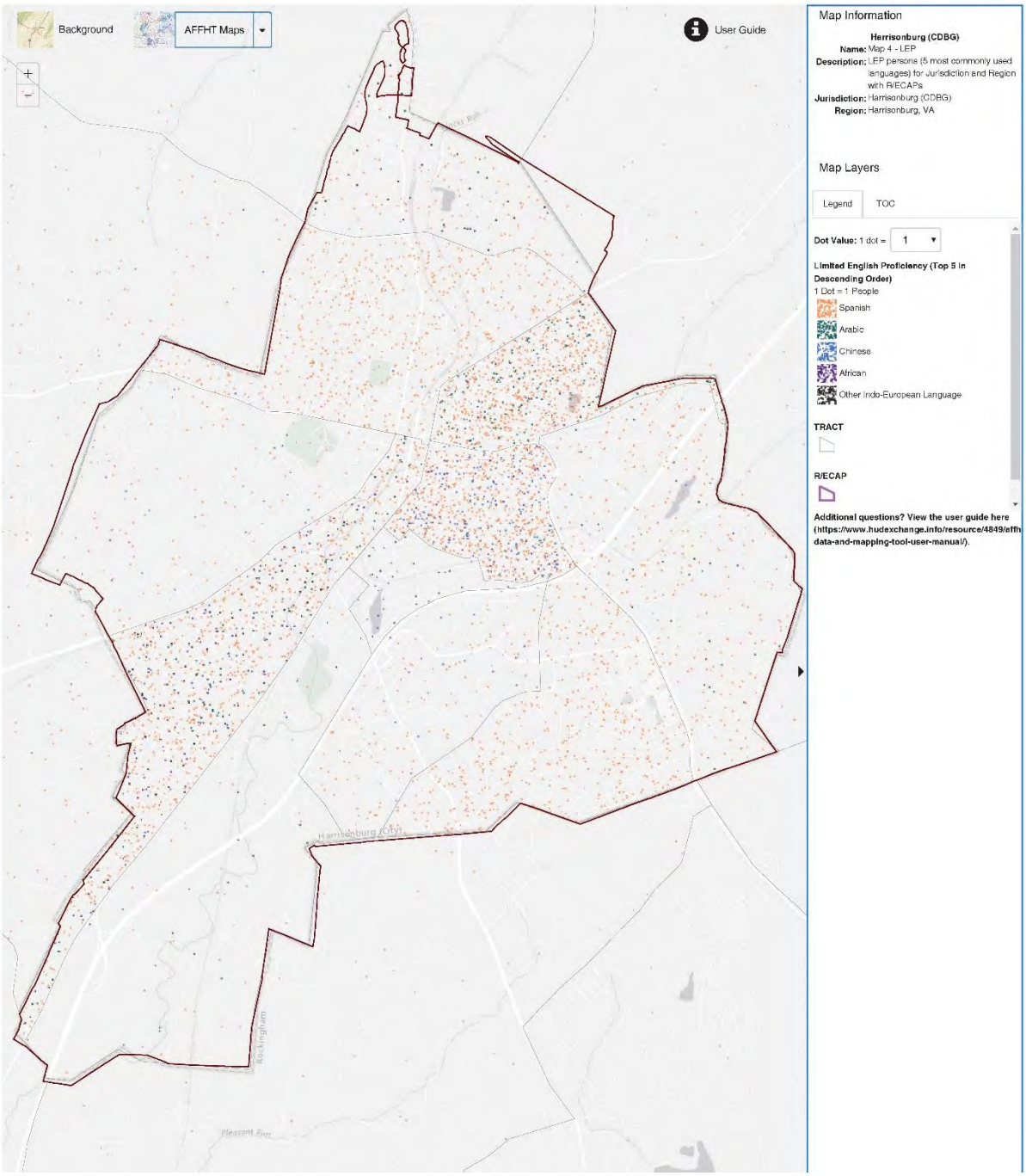

Predominant racial or ethnic group between 2010-2014.
Predominant Racial or Ethnic Group
Year: 2014
Shaded by: Block Group, 2010
Insufficient Data
White >90%
White 70-90%
White 50-70%
White <50%
Hispanic >90%
Hispanic 70-90%
Hispanic 70-90%
Hispanic 50-70%
Hispanic <50%
Source: Census
Harrisonburg
4.01
4.02
1.01
3.01
2.04
Preston Heights
2.06
1.02
2.07
2.05
3.02
2.03
Park View
Memorial Stadium
Purcell Park
Ashby Heights
James Madison University
Eastern Mennonite University
Rest Haven Memorial Gardens
Spotswood Country Club
Eastlawn Memorial Gardens
Massanetta Springs
Peach Grove (historical)
Lakeview Golf Course
POLICYMAP

Map 3 – National Origin




Estimated percent of all people who were 'foreign born' as of 2010-2014.
Percent Foreign Born Population
Year: 2014
Shaded by: Census Tract, 2010
Insufficient Data
5% or less
6% - 10%
11% - 15%
16% - 20%
21% or more
Source: Census
4.01
4.02
1.01
3.01
2.04
Preston Heights
2.06
James Madison University
1.02
2.07
2.05
Ashby Heights
3.02
2.03
Harrisonburg
Park View
Memorial Stadium
Purcell Park
Spotswood Country Club
Massanetta Springs
Eastlawn Memorial Gardens
Peach Grove (historical)
Lakeview Golf Course
Eastern Mennonite University
Rest Haven Memorial Gardens
Norfolk Southern
Mt Clinton Pike
Rawley Pike
W Market St
E Market St
N Main St
S Main St
S High St
University Blvd
Port Republic Rd
John Wayland Hwy
Shenandoah Valley
POLICYMAP

Map 4 – LEP


Background
AFFHT Maps
User Guide
Map Information
Harrisonburg (CDBG)
Name: Map 4 - LEP
Description: LEP persons (5 most commonly used languages) for Jurisdiction and Region with R/ECAPs
Jurisdiction: Harrisonburg (CDBG)
Region: Harrisonburg, VA
Map Layers
Legend
TOC
Dot Value: 1 dot = 1
Limited English Proficiency (Top 5 in Descending Order)
1 Dot = 1 People
Spanish
Arabic
Chinese
African
Other Indo-European Language
TRACT
R/ECAP
Additional questions? View the user guide here (https://www.hudexchange.info/resource/4849/affh data-and-mapping-tool-user-manual/).
Harrisonburg (City)
Rockingham
Pleasant Run

d. Consider and describe the location of owner and renter occupied housing in determining whether such housing is located in segregated or integrated areas.

With such a large percentage of the population being students, a high renter population is likely for the City. Even so, Harrisonburg has a low homeownership rate compared to many other communities, with only 37% in 2010. As a result, rental housing comprises a significant portion of the housing stock in much of the City. However, neighborhoods within the City that are segregated or have larger non-White populations tend to have lower rates of homeownership.

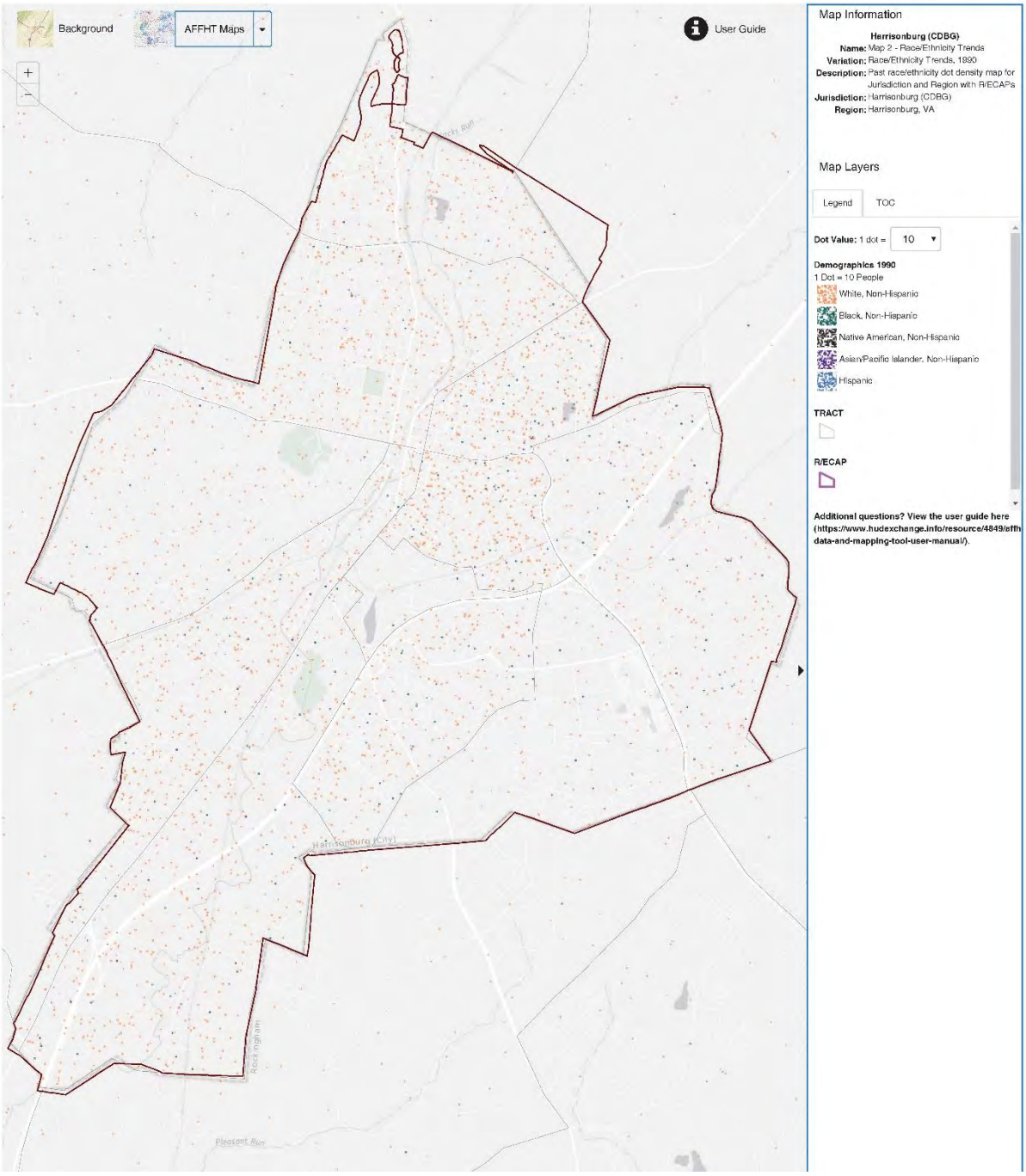
As mentioned previously, the Downtown/Old Town/Reservoir area (tract 2.04) is somewhat segregated, with few residents of Mexican heritage despite a large number of foreign-born, as well as a stark divide between White and Hispanic neighborhoods. The Northeast neighborhood (tract 1.01) is the other of the two sections in Harrisonburg that are predominantly Hispanic. Both of these places have high rates of renter-occupancy.

e. Discuss how patterns of segregation have changed over time (since 1990).

The City of Harrisonburg grew substantially between 1990 and 2010, increasing in population by almost 57%. Over one-third of this growth can be attributed to foreign-born residents, a group that increased by nearly 900% over that same time period. As such, many neighborhoods with few non-White residents in 1990 have since become more diverse.

However, the overall dissimilarity indices for most non-White groups have increased since 1990. This means that although more neighborhoods have non-White and foreign-born households than they did 20 years ago, those new households are likely living in small clusters within larger census tracts.

Map 2 – Race/Ethnicity Trends, 1990



f. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future.

As the location of a Refugee Processing Center affiliate, Harrisonburg's refugee population has swelled over the past 15 years. Church World Service's (CWS) Refugee Resettlement Office currently resettles between 175 and 200 refugees every year (source: MWRA, Feb 2016), mostly from the Middle East, and is expecting to accept Syrian families in the near future. As these refugee families are housed and begin their lives in the community, it is possible that ethnic enclaves could form or expand, either intentionally based on the preferences of the refugees or because of the influence of available housing, public transportation, and other public policies.

James Madison University's enrollment surpassed 21,000 students in the fall of 2015 and is projected to continue increasing. This segment of City residents comprises over 41% of the total 2014 population estimated by the US Census. JMU students have a significant impact on the local rental housing market. The cycle of newly constructed off-campus student rental housing drawing the tenants from older units has created a trickle-down effect. As students move into the newer units, their vacated older units provide opportunities for affordable, multi-family housing for non-student households. Where there are clusters of older vacated student housing, there is the potential for communities of lower income racial/ethnic groups to concentrate together in a neighborhood.

According to local stakeholders, Harrisonburg's transit system does not provide access to certain critical community amenities or employment centers such as the central post office in the City's southern area or the poultry processing facilities in the County. Since LMI families rely more heavily on transit, the routing decisions made by the Harrisonburg Department of Public Transportation (HDPT) have the power to both exacerbate and alleviate segregation. However, operation of the City's transit system relies heavily on contributions from James Madison University, whose students can ride busses for no additional charge. As such, HDPT's decision making ability regarding hours and coverage are limited and tied heavily to the needs of the University, which are frequently mismatched with those of the protected classes in the community.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.

There is a shortage of large rental units (three or more bedrooms) that are affordable and accessible for non-student households. Large families might move into formerly student-occupied units as newly built student housing becomes more popular, but this housing is generally not well-designed for families with children. In addition, these units are primarily located in neighborhoods that are convenient for JMU, which are not always well suited for families or working low-income individuals to access services and employment.

HRHA faced vocal community opposition during the planning phase of a new project-based development. This opposition cause HRHA to find an alternate location for the project, which is now called Commerce Village and serves homeless people with mental and physical disabilities.

For the most part, new private, multi-family development in the City caters to JMU students. This means that some neighborhoods, particularly those close to JMU and other amenities sought by students, see a lot of private investment, while others do not. This focus of private housing investment in specific neighborhoods has the potential to perpetuate patterns of segregation in Harrisonburg.

Even more broadly, the location of affordable housing is a major influence citywide. Harrisonburg's most segregated neighborhood (tract 2.04) and the neighborhoods adjacent to it contain some of the more affordable rental options in the City. In addition, around half of HRHA's Housing Choice Vouchers are used outside the City in Rockingham County due to the increased affordability of units there.

b. The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and mobility options for protected class groups.

Harrisonburg Redevelopment and Housing Authority (HRHA) has converted all of its former public housing units into project-based Section 8 developments as of 2009. Since then, it has also acquired and rehabbed additional units.

Moving forward, HRHA's strategy for increasing the number of publicly assisted units in the City is through rehabilitation and stabilization. This is more cost-effective than managing public housing units, and allows HRHA to potentially invest outside of segregated neighborhoods by removing some land and construction costs from the equation. This City also believes in this strategy for decreasing segregation, having committed $140,000 of CDBG funding to HRHA for its rehab projects annually for 15-20 years beginning in 2005.

All HRHA tenants who are not elderly or disabled are required to participate in a five-year Family Self-Sufficiency Program designed to transition them out of HRHA-managed units and into the private housing market. Residents who do not graduate receive a Housing Choice Voucher (HCV). Through either outcome, HRHA residents are encouraged to more fully integrate into the community.

3. Contributing Factors of Segregation

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.

- ☑ Community opposition
- ☑ Lack of private investments in specific neighborhoods
- ☑ Location and type of affordable housing

ii. R/ECAPs

1. Analysis

a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction.

There are no R/ECAPs identified by HUD's AFFH data and mapping tool. According to HUD's "AFFH Data Documentation" report, the racial/ethnic concentration threshold for rural areas can be reduced from 50% to 20%. In 2014, 30% and 17% of Harrisonburg's population were non-White and Hispanic, respectively. Given this fact, even the lower threshold of 20% does not pinpoint any meaningful racial or ethnic concentrations in the City.

Instead, this analysis will consider tracts in which 15% or more of residents are non-White (half the citywide rate) or Hispanic, and 33% or more live in poverty (the citywide rate, and lower than the 40% threshold used by the mapping tool). Under this definition there is one tract (2.04) that qualifies as a "concentration area" comprised of the Downtown, Old Town, and Reservoir neighborhoods. This area is bounded by South Main Street on the west, East Market Street on the north and east, and I-81 and JMU on the south.

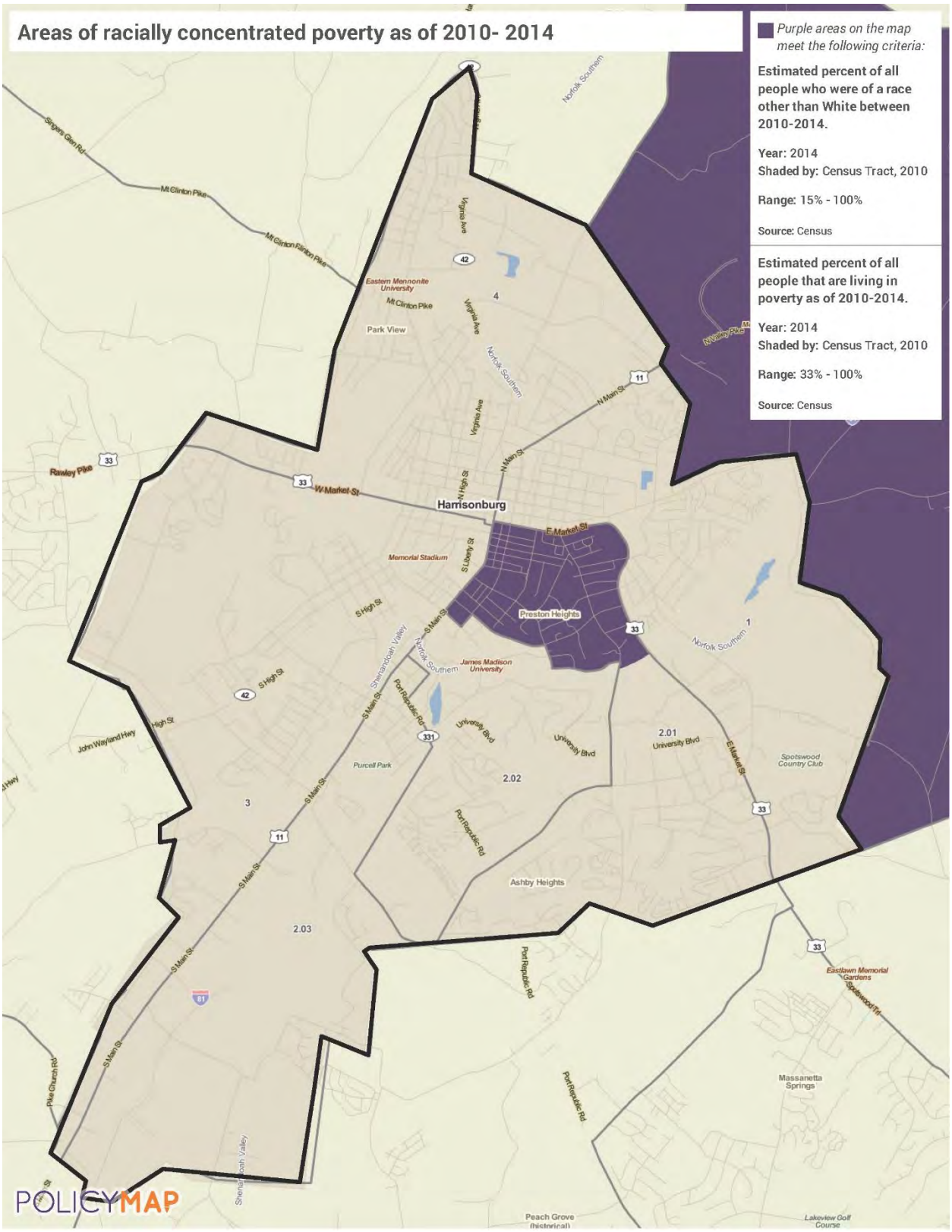
b. Which protected classes disproportionately reside in R/ECAPs compared to the jurisdiction and region?

Hispanics are the largest racial/ethnic group in this tract, representing over 23% of residents, compared to 17% in the City at large in 2014. There is also a high number of LEP persons in this area, along with two adjacent tracts to the northeast (1.01) and southwest (3.02), with a number of different languages spoken. In most of the rest of the City, Spanish is by far more commonly spoken than the other common languages.

Notable findings about this "concentration area" previously mentioned include a high level of segregation among Whites/Hispanics, even though the tract contains a disproportionately lower amount of Mexican-born residents than other tracts in the City.

Table 4 – "Concentration Area" Demographics			
	(Harrisonburg, VA CDBG) Jurisdiction		
Race/Ethnicity		**#**	**%**
Total Population in R/ECAPs		4,390	-
White, Non-Hispanic		2,686	61.18
Black, Non-Hispanic		175	3.99
Hispanic		1,020	23.23
Asian or Pacific Islander, Non-Hispanic		479	10.91
Native American, Non-Hispanic		0	0.00
Other, Non-Hispanic		30	0.68
Family Type		**#**	**%**
Total Families in R/ECAPs		607	-
Families with children		304	50.08
National Origin	**Country**	**#**	**%**
#1 country of origin	El Salvador	199	20.93
#2 country of origin	China excl. Hong Kong & Taiwan	155	16.30
#3 country of origin	Honduras	128	13.46
#4 country of origin	Iran	90	9.46
#5 country of origin	Dominican Republic	73	7.68
#6 country of origin	Philippines	66	6.94
#7 country of origin	Belarus	51	5.36
#8 country of origin	Vietnam	40	4.21
#9 country of origin	Mexico	27	2.84
#10 country of origin	Germany	25	2.63

Note 1: 10 most populous groups at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.
Note 2: Data Sources: ACS 2010-2014
Note 3: Refer to the Data Documentation for details (www.hudexchange.info).


Areas of racially concentrated poverty as of 2010- 2014
Purple areas on the map meet the following criteria:
Estimated percent of all people who were of a race other than White between 2010-2014.
Year: 2014
Shaded by: Census Tract, 2010
Range: 15% - 100%
Source: Census
Estimated percent of all people that are living in poverty as of 2010-2014.
Year: 2014
Shaded by: Census Tract, 2010
Range: 33% - 100%
Source: Census
Harrisonburg
Preston Heights
Ashby Heights
Park View
Eastern Mennonite University
James Madison University
Memorial Stadium
Purcell Park
Spotswood Country Club
Massanetta Springs
Eastlawn Memorial Gardens
Lakeview Golf Course
Peach Grove (historical)
Mt Clinton Pike
Rawley Pike
W Market St
E Market St
N Main St
S Main St
S High St
Virginia Ave
Norfolk Southern
Shenandoah Valley
Port Republic Rd
University Blvd
Spotswood Rd
Pike Church Rd
John Wayland Hwy
Singers Glen Rd
Mt Clinton Parlton Pike
N Valley Pike
4
3
2.02
2.03
2.01
1
POLICYMAP

c. Describe how R/ECAPs have changed over time (since 1990).

Using the same criteria described above (15% or more non-White and 33% or more persons in poverty), there were no "concentration areas" in Harrisonburg in 2000.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics.

There is no additional local information regarding R/ECAPs or locally defined "concentration areas" affecting other protected classes available.

b. The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and mobility options for protected class groups.

For the most part, new private, multi-family development in the City caters to JMU students. This means that some neighborhoods, particularly those close to JMU and other amenities sought by students, see a lot of private investment, while others do not. This focus of private housing investment in specific neighborhoods affects where residents of Harrisonburg's "concentration area" are able to find affordable housing, now and in the future.

Even more broadly, the location of affordable housing is a major influence citywide. Harrisonburg's "concentration area" and the neighborhoods adjacent to it contain some of the more affordable rental options in the City. In addition, around half of HRHA's Housing Choice Vouchers are used outside the City in Rockingham County due to the increased affordability of units there.

3. Contributing Factors of R/ECAPs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.

- ☑ Lack of private investments in specific neighborhoods
- ☑ Location and type of affordable housing

iii. Disparities in Access to Opportunity

1. Analysis

Table 12 - Opportunity Indicators, by Race/Ethnicity

(Harrisonburg, VA CDBG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	58.32	39.95	48.55	61.87	45.06	67.95	37.50
Black, Non-Hispanic	49.61	35.20	55.17	69.04	49.45	60.71	41.96
Hispanic	45.56	38.49	57.09	71.19	51.56	62.38	42.46
Asian or Pacific Islander, Non-Hispanic	59.61	37.93	45.06	59.64	43.59	67.82	37.35
Native American, Non-Hispanic	54.85	31.15	44.37	63.16	44.60	66.69	39.63
Population below federal poverty line							
White, Non-Hispanic	55.93	46.11	40.52	71.03	49.55	67.31	34.83
Black, Non-Hispanic	47.42	43.76	49.58	77.17	52.28	60.97	39.19
Hispanic	42.97	35.40	55.50	75.31	53.00	57.95	43.52
Asian or Pacific Islander, Non-Hispanic	57.22	45.02	25.30	78.87	50.09	60.58	31.58
Native American, Non-Hispanic	84.00	53.00	89.00	44.00	36.00	51.02	36.00

(Harrisonburg, VA CBSA) Region	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	58.73	39.89	57.43	35.61	29.09	50.53	65.90
Black, Non-Hispanic	51.98	36.98	58.16	56.61	41.49	57.23	52.71
Hispanic	47.45	38.02	60.87	55.21	42.33	58.83	54.61
Asian or Pacific Islander, Non-Hispanic	61.08	39.09	50.65	52.21	39.27	63.84	45.90
Native American, Non-Hispanic	52.44	34.97	50.57	38.85	31.57	47.46	64.00
Population below federal poverty line							
White, Non-Hispanic	54.83	43.43	48.34	51.46	37.90	56.26	53.94
Black, Non-Hispanic	46.98	41.02	52.55	67.15	47.09	57.68	45.51
Hispanic	44.67	33.62	56.78	61.28	44.50	52.64	54.29
Asian or Pacific Islander, Non-Hispanic	57.31	44.68	25.70	77.30	48.95	59.88	33.34
Native American, Non-Hispanic	66.89	42.27	72.28	38.17	30.94	38.54	55.06

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).

a. Educational Opportunities

i. Describe any disparities in access to proficient schools based on race/ethnicity, national origin, and family status.

The range of School Proficiency Index scores in Harrisonburg is relatively small, meaning that no particular protected class has excessively better or worse access to good performing schools. Based on the raw index scores, the racial and ethnic groups measured in Harrisonburg all have roughly the same access to proficient schools. The same holds true for the MSA region. Although, for the most part, schools in the City have equivalent or higher index scores than nearby schools in the county.

The single exception to this trend is poor Hispanic families, which have a slightly lower index score and, therefore, slightly less access to quality schools in their neighborhoods.

ii. Describe the relationship between the residency patterns of racial/ethnic, national origin, and family status groups and their proximity to proficient schools.

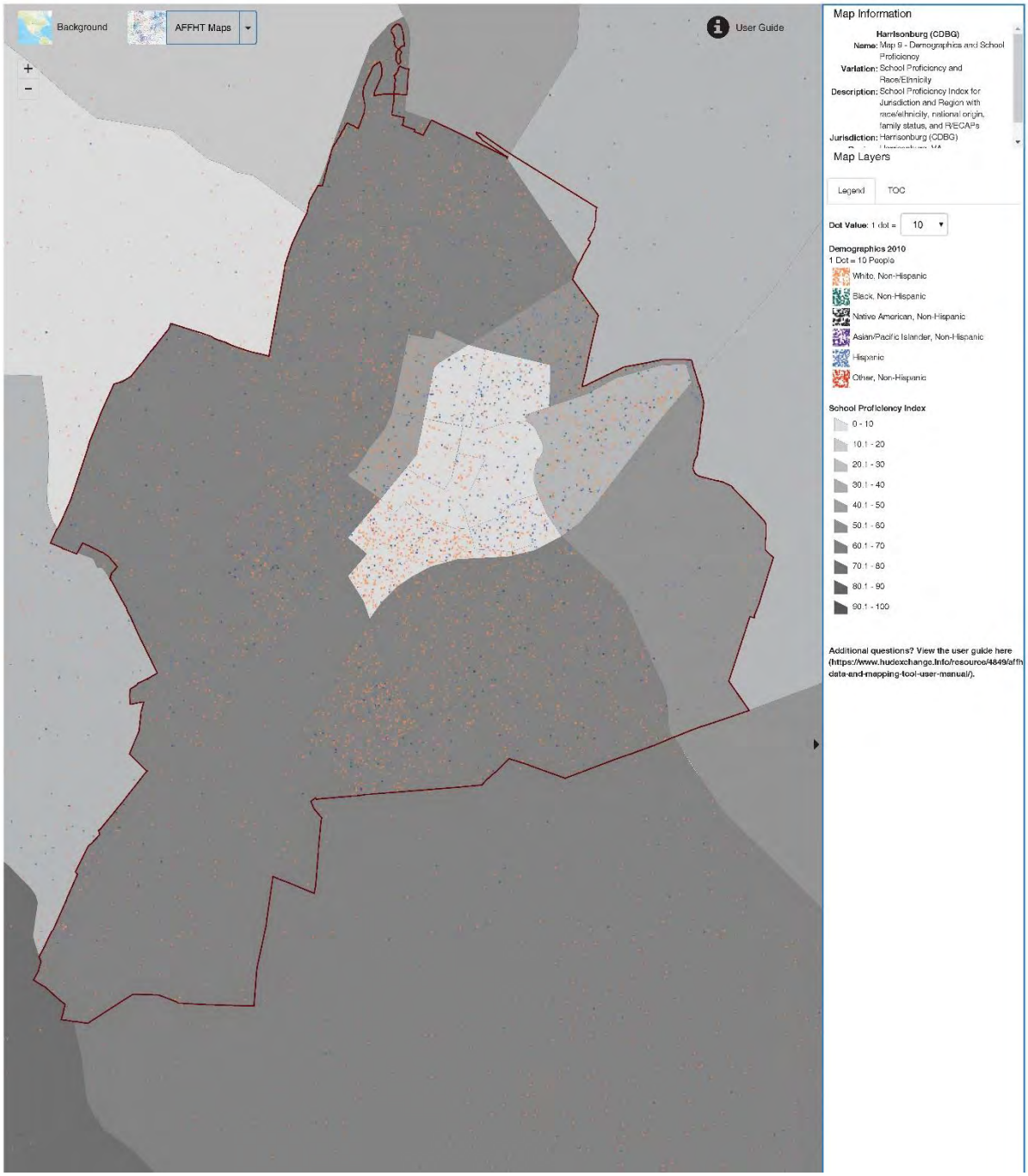
The geographic distribution of proficient schools is relatively uniform throughout most of Harrisonburg. The center of the City – bounded roughly by Main Street and Market Street to the west and east, and by I-81 and Washington Street to the south and north – has the lowest School Proficiency scores in the 0-10 range, with higher scores in the 50-60 range in the urban fringe.

This central district contains the predominantly White neighborhood near Downtown, but also a census tract with one of the City's highest Hispanic concentrations. Foreign-born residents in this area are mostly from El Salvador and the Dominican Republic, although not apparently in disproportion to the rest of the City. This area tends to have marginally fewer families with children than the areas toward the edges of the City.

iii. Describe how school-related policies, such as school enrollment policies, affect a student's ability to attend a proficient school. Which protected class groups are least successful in accessing proficient schools?

The Harrisonburg City Public School District is coterminous with the City and contains five elementary schools, two middle schools, and one high school. Enrollment in elementary schools is based on residency, so families living in the central section of the City with lower School Proficiency Index scores have less access to good schools. However, this does not seem to adversely impact any particular protected class.

Map 9 – School Proficiency Index and Race/Ethnicity



b. Employment Opportunities

i. Describe any disparities in access to jobs and labor markets by protected class groups.

Hispanics in Harrisonburg have the highest Labor Market Engagement Index score, 12 points higher than Asians and Pacific Islanders at the bottom of the range. White residents have a lower score than both Hispanics and Blacks. The Labor Market Engagement Index measures unemployment, labor force participation, and educational attainment. The higher scores of Hispanics and Blacks imply that more members of these groups are actively employed than others.

For the Jobs Proximity Index, on the other hand, the range of scores is narrower, with Whites and Asians at the higher end. This means that Blacks and Hispanics have to travel farther to reach their jobs.

Asians living in poverty score much lower on the Labor Market Index than their wealthier counterparts, indicating a stronger dichotomy in this racial group. Labor Market Engagement is generally higher in the region than in the City, while Jobs Proximity is lower. This means that county residents face less unemployment but have to travel farther to work.

ii. How does a person's place of residence affect their ability to obtain a job?

Labor Market Engagement is lowest in the Downtown/Old Town/Reservoir area (census tract 2.04), JMU's Main and East Campus, and points south. As mentioned previously, this tract 2.04 has a high concentration of Hispanics. However, the high Labor Market Engagement by the Hispanic population in the rest of the City must balance this area of low access since the overall index score for Hispanics is high.

Job Proximity Index scores are more geographically irregular, with the highest scores in the north (tract 4.01), south (tract 2.03), and east (tract 1.02) near Eastern Mennonite University and the I-81 and Market Street commercial districts. The neighborhoods with the lowest proximity to jobs in tracts 1.02 and 3.01 appear to be more suburban in nature.

Based on feedback from stakeholders interviewed during the community participation process, the coverage and hours of Harrisonburg's public busses are an important factor in securing and retaining employment. Residents in neighborhoods with poor or insufficient transit service may not be able to access employment centers at all or during the times of day they need based on shifts worked.

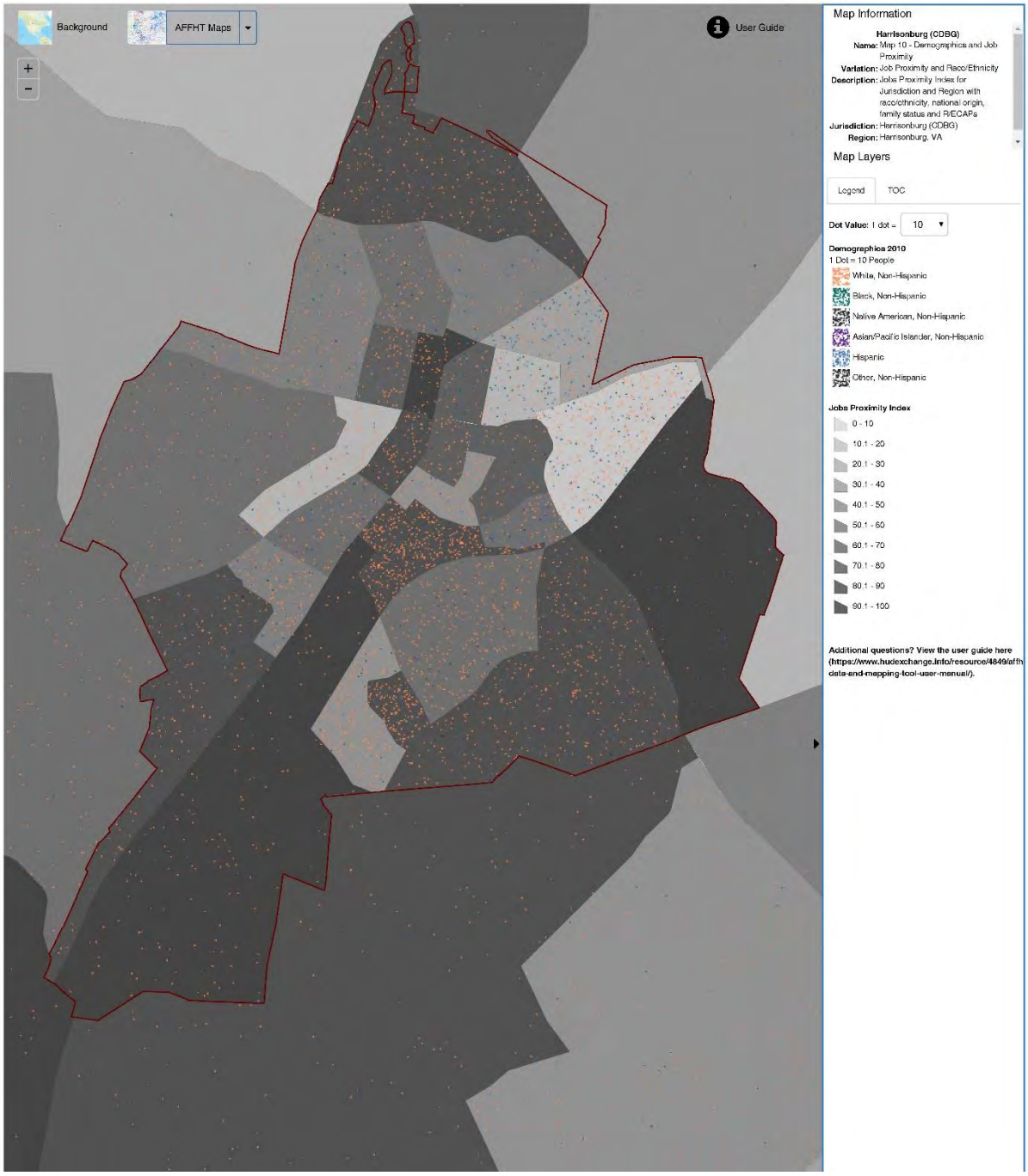
iii. Which racial/ethnic, national origin, or family status groups are least successful in accessing employment?

Families with children can experience difficulty accessing employment due to a lack of childcare facilities. This affects families at all income levels, but is a significant barrier especially for LMI families who need affordable options with longer or more convenient operating hours.

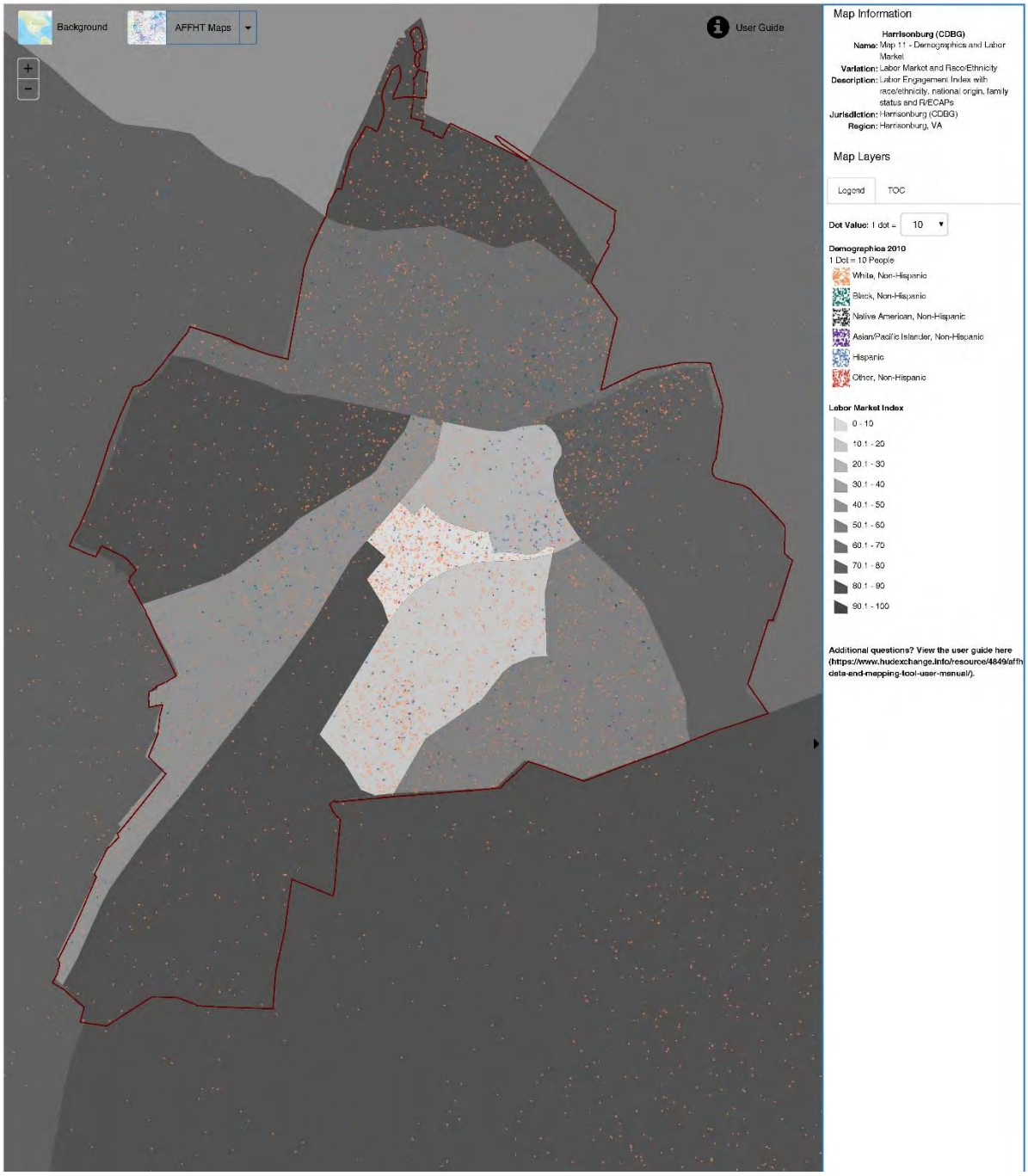
Stakeholders expressed that entry-level, lower-skill employment opportunities are available in the community. However, these jobs are often hard to access via transit and are unsuitable for those with physical disabilities. In addition, many service sector jobs are filled by college students, and non-students are used to fill seasonal positions when college classes are not in session.

Harrisonburg has a large refugee population that faces significant language and employment barriers. Their high levels of educational and professional qualifications and certifications may not transfer between their nation of origin and the U.S., which can lead to prolonged unemployment and underemployment.

Map 10 – Job Proximity Index and Race/Ethnicity



Map 11 – Labor Market Engagement Index and Race/Ethnicity



c. Transportation Opportunities

i. Describe any disparities in access to transportation based on place of residence, cost, or other transportation related factors.

The Low Transportation Cost Index measures the cost of transport and proximity to public transportation by neighborhood. The Transit Trips Index measures how often low-income families in a neighborhood use public transportation.

The Low Cost Index is relatively uniform throughout the City. The census tract (2.06) that contains JMU's main campus received the lowest score in the region, but is likely an outlier due to its walkability and free bus service for students. The highest score is in the Northeast neighborhood (tract 1.01), one of the most racially diverse in the City.

The results are similar for the Transit Trips Index, with one notable difference. The southern part of the City along I-81 has a low score, indicating that residents in the area take few transit trips. This tract does not have a concentration of any particular protected class.

ii. Which racial/ethnic, national origin or family status groups are most affected by the lack of a reliable, affordable transportation connection between their place of residence and opportunities?

Every racial and ethnic group has a higher Transit Index score than Low Cost Index score. This means that, although Harrisonburg renters are using the transit system, transportation is still only moderately affordable. Asians have the lowest index scores, followed by Whites; Hispanics have the highest scores.

Both the Transit and Low Transportation Cost Indices are lower for the MSA than the City. In other words, county residents use the transit system less and are paying more for transportation. This difference is starkest for White families whose scores for both indices are 35-40% lower in the county than the City.

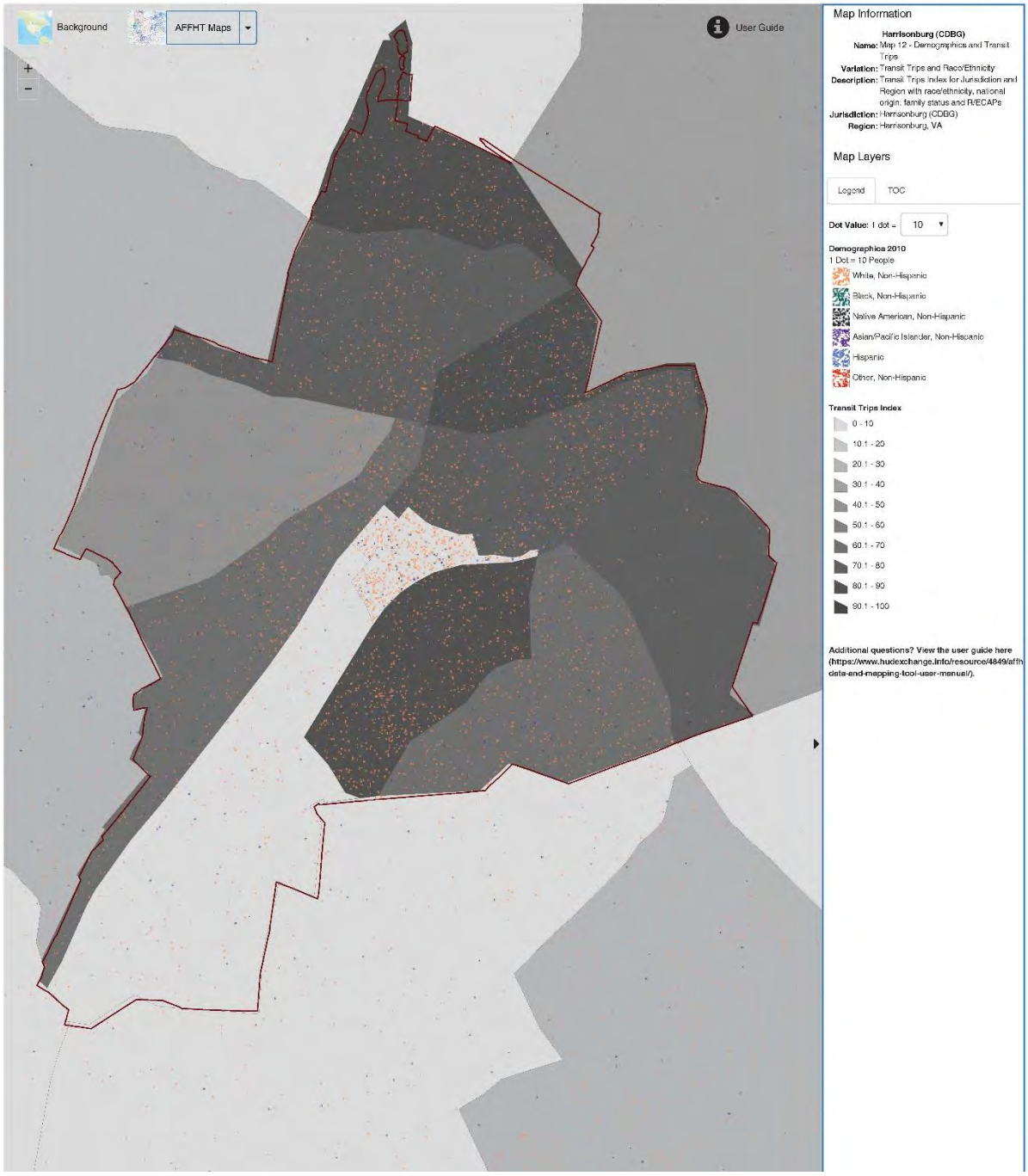
Overall, the lack of reliable, affordable transit affects all low-income households, regardless of protected class, who rely on it to access jobs, education, and community facilities.

iii. Describe how the jurisdiction's and region's policies, such as public transportation routes or transportation systems designed for use personal vehicles, affect the ability of protected class groups to access transportation.

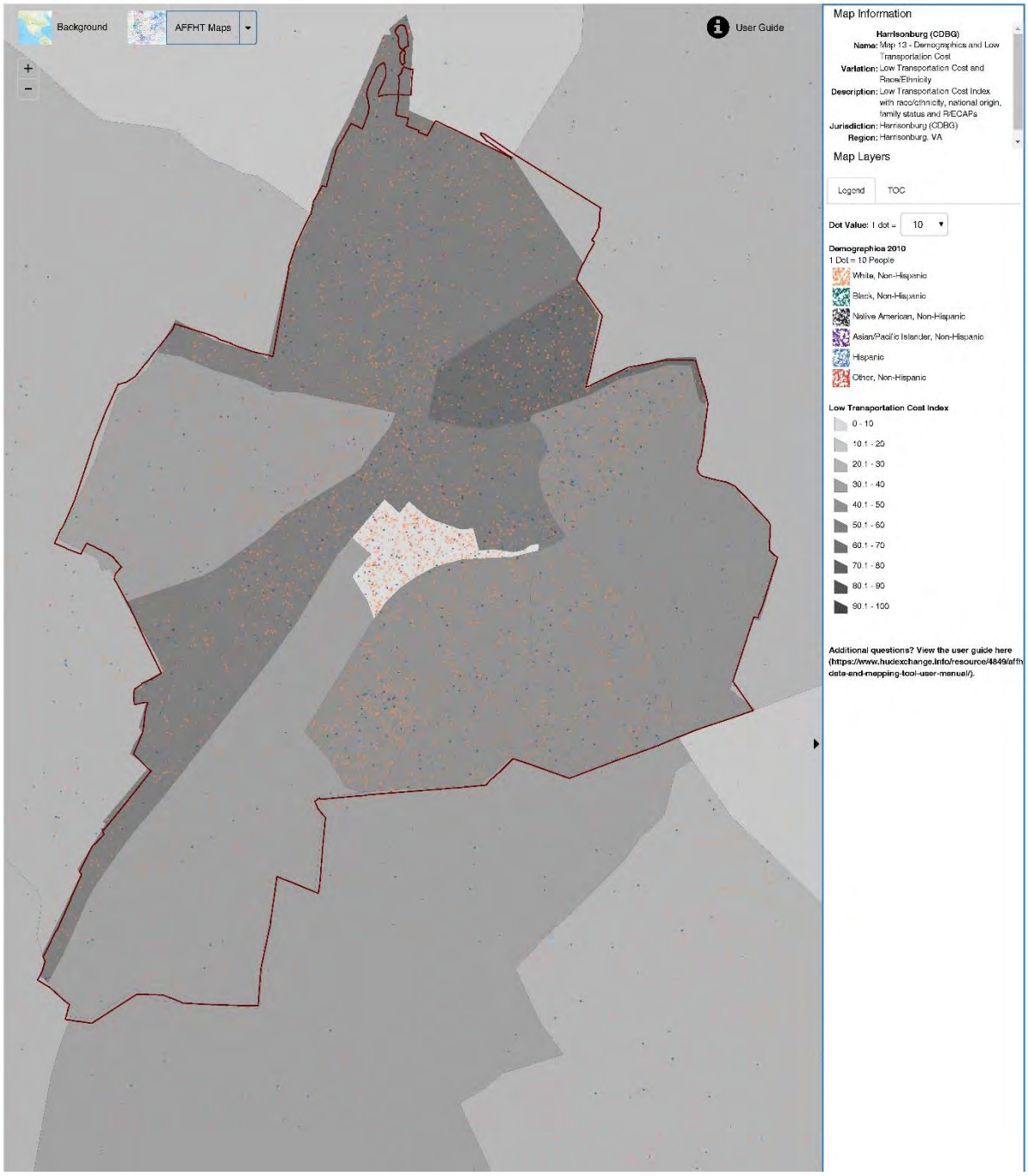
For a city of its size, Harrisonburg has a robust transit system. This is a direct result of the collaboration and partnership with James Madison University whose students can use the system for no additional charge. As such, Harrisonburg Department of Public Transportation's (HDPT) hours and coverage are tied heavily to the needs of the University, including reduced operation during school breaks and holidays. These needs are frequently mismatched with those of the protected classes in the community.

The sharp jurisdictional boundary between the Independent City of Harrisonburg and Rockingham County is a barrier to regional transportation coordination. Stakeholders described past disinterest on the county's part for extensions of bus service into the county. As a result, there are few transit options between the City and the county, which reduces access to employment opportunities out in the county for City residents.

Map 12 –Transit Trips Index and Race/Ethnicity



Map 13 – Low Transportation Cost Index and Race/Ethnicity



d. Low Poverty Exposure Opportunities

i. Describe any disparities in exposure to poverty by protected class groups.

Whites and Asians have the highest score on the Low Poverty Index, which is inversely related to the poverty in a given neighborhood. Blacks and Hispanics have lower scores, with a 14-point difference between Hispanics (the lowest score) and Asians (the highest). This means that Hispanic and Black residents tend to live in neighborhoods with higher rates of poverty than other racial groups.

ii. What role does a person's place of residence play in their exposure to poverty?

The lowest exposure to poverty (i.e. a high index score) outside of JMU is in the western part of the City (tract 3.01). The greatest exposure to poverty is in the central and eastern section of the City (tracts 2.04 and 1.01), which includes the Downtown, Old Town, Reservoir, and Northeast neighborhoods. Living in this area, which contains some of the highest concentrations of non-Whites in the City, results in a higher exposure to poverty.

There is not a large difference in exposure to poverty between neighborhoods in Harrisonburg and those in the county. The clustering of Low Poverty Index scores apparent within the City does not extend outside into the region, likely because of the much lower population density in the county.

iii. Which racial/ethnic, national origin or family status groups are most affected by these poverty indicators?

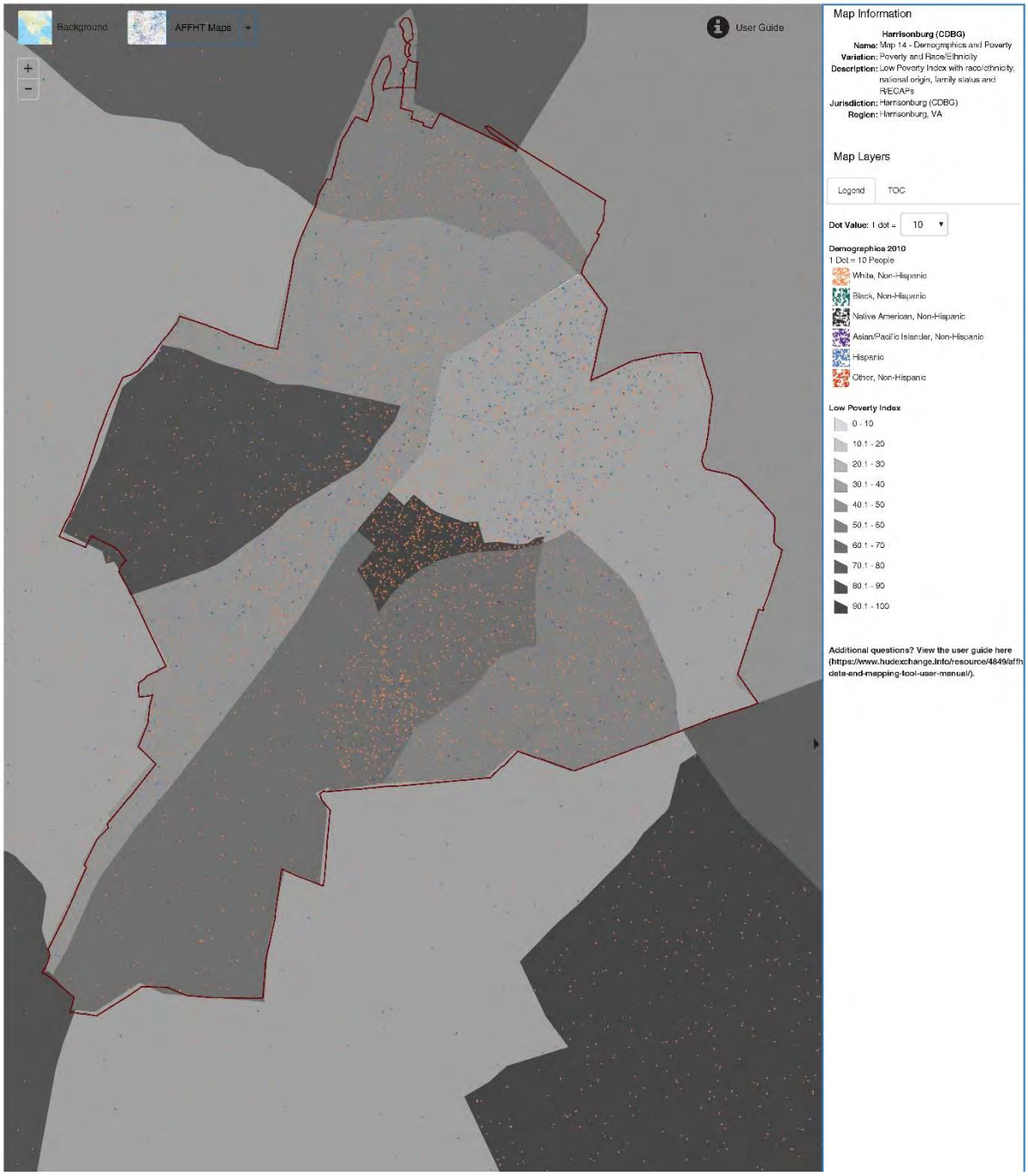
As previously mentioned, Hispanic and Black residents are the most affected by neighborhood poverty. Harrisonburg's "concentration area" is also among the most affected census tracts.

The areas with low exposure to poverty have fewer foreign-born residents than the rest of the City, and apparently slightly fewer families with children. These two protected classes, at least, are more prevalent in neighborhoods with worse Low Poverty Index scores.

iv. Describe how the jurisdiction's and region's policies affect the ability of protected class groups to access low poverty areas.

The City's policies and programs are designed to affirmatively further fair housing for all LMI individuals and members of the protected classes.

Map 14 – Low Poverty Index and Race/Ethnicity



e. Environmentally Healthy Neighborhood Opportunities

i. Describe any disparities in access to environmentally healthy neighborhoods by protected class groups.

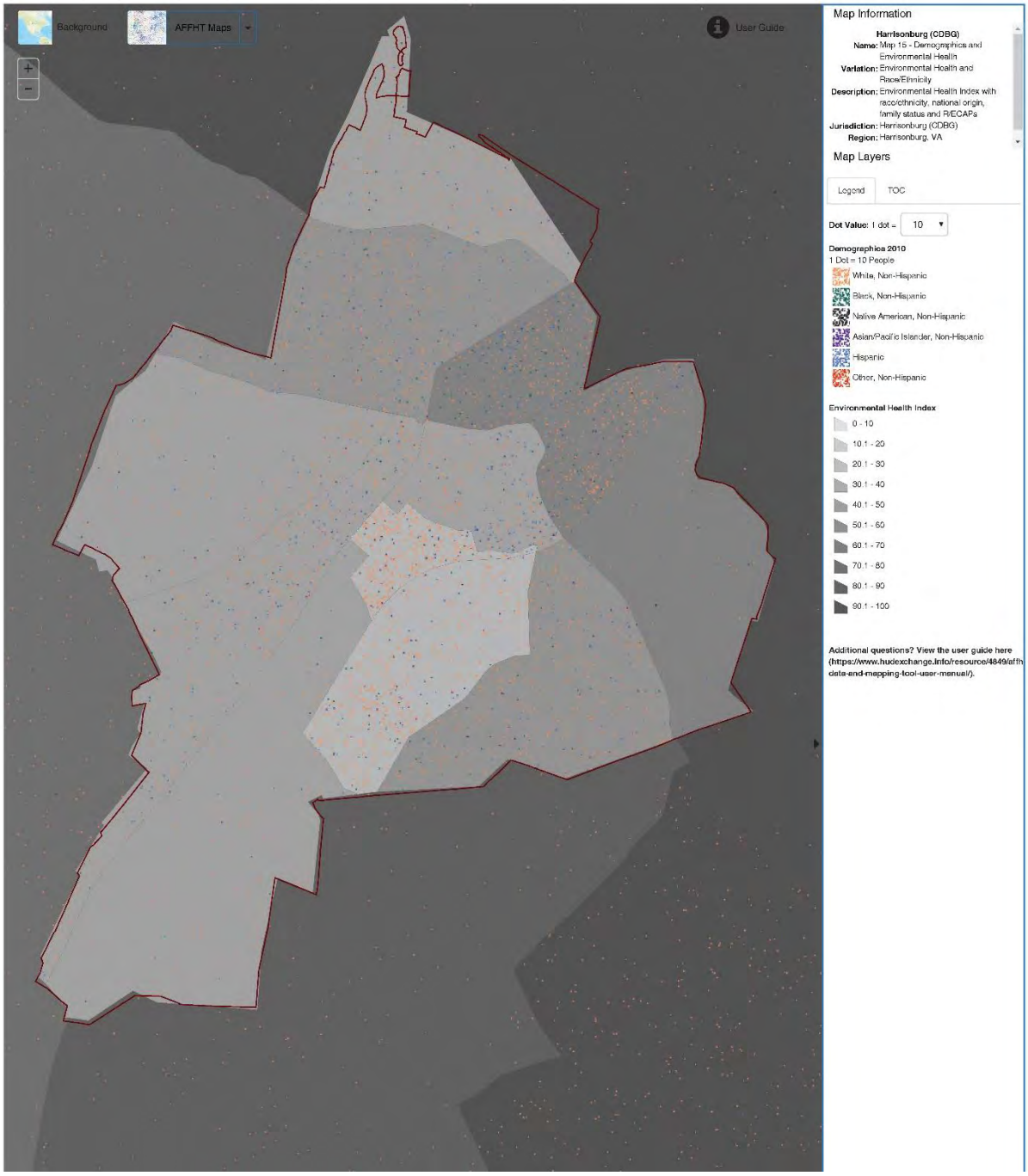
The Environmental Health Index measures exposure based on EPA estimates of air quality, carcinogenic, respiratory, and neurological toxins by neighborhood. It is one of the lowest scoring indices for the City, second only to the School Proficiency Index. The scores for individual racial and ethnic groups are relatively close to each other, with no one group seeming to be disproportionately affected by environmental issues.

Neighborhoods within the City also received relatively similar scores. The areas in the rest of the region, however, all scored much higher on the index, meaning that they have less exposure to potential health hazards. These areas, as discussed previously, also have smaller non-White populations.

ii. Which racial/ethnic, national origin or family status groups have the least access to environmentally healthy neighborhoods?

Non-Whites, foreign-born, and families with children, all of whom are more likely to live within City limits, have less access to the environmentally healthier neighborhoods outside the City. This is especially true given the poor transportation connections between the City and the county, as previously discussed.

Map 15 – Environmental Health Index and Race/Ethnicity



f. Patterns in Disparities in Access to Opportunity

i. Identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors based on race/ethnicity, national origin or familial status. Identify areas that experience an aggregate of poor access to opportunity and high exposure to adverse factors. Include how these patterns compare to patterns of segregation and R/ECAPs.

In the aggregate, indicators of opportunity are evenly dispersed throughout Harrisonburg. This is due to most Opportunity Indices scoring relatively closely throughout the City, as well as multiple indices that are inversely correlated with each other (such as Labor Market Engagement and Transit Trips). The neighborhoods that are least likely to have as much access to opportunity as the rest of the City, even by a marginal amount, is the Downtown/Northeast area (census tracts 2.04 and 1.01). This includes the City's one locally defined "concentration area."

Of the protected classes for which there is data, Blacks and Hispanics appear to have the least access to opportunity overall.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.

As previously mentioned, private rental housing developers are compelled by the student market. This means new development activity serves this market and is often not aimed at increasing access to opportunity for protected classes or furthering fair housing. The same holds true, to some lesser degree, for public transit, which relies heavily on funding from JMU.

Harrisonburg is still a major center of the US poultry industry. Many of these employers are located in Rockingham County outside the City of Harrisonburg, making these jobs more inaccessible to those without reliable private transportation.

b. The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).

No additional information relevant to access to opportunities is available.

3. Contributing Factors of Disparities in Access to Opportunity

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

- ☑ The availability, type, frequency, and reliability of public transportation
- ☑ Lack of private investments in specific neighborhoods
- ☑ Location of employers
- ☑ Location and type of affordable housing

iv. Disproportionate Housing Needs

1. Analysis

a. Which groups (by race/ethnicity and family status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups? Which groups also experience higher rates of severe housing burdens when compared to other groups?

Asian households experience housing problems at the highest rate in both the City and the region, followed by Hispanics and then Blacks (the results for Native American and Other households are not statistically significant since they account for such a small percentage of the population).

The difference in the rates of housing problems between the highest racial group (Asians) and lowest (Whites) is significant – 25 percentage points. White households, in fact, experience problems at a slightly lower rate than the City and region overall. Although the difference between the City and the region for most racial and ethnic groups is negligible, White households in the MSA have fewer housing problems than their counterparts in the City.

All of these racial/ethnic trends are roughly comparable for households experiencing severe housing problems, too.

Small families with fewer than five members are much less likely to have housing problems than large families and non-families, with a rate of problems a full 35 percentage points lower than large families within the City.

When considering severe cost burden (paying more than 50% of household income on housing costs) alone, Asians once again experience the highest rate. Hispanics, however, have the lowest rate of severe cost burden, lower than both Whites and the City rate overall. This implies that Hispanic households suffer from other severe problems (incomplete kitchen facilities, incomplete plumbing facilities, and overcrowding) much more than any other group, since their total rate of all severe problems is comparable to Asians.

Small families are once again less likely than any other household type to be severely cost burdened. Non-families, in this case, experience the most severe cost burden. They are more than twice as likely to be severely cost-burdened as large families, and almost four times as likely as small families. This implies that cost burden is much more prevalent among non-family households than the other kinds of housing problems.

Table 9 - Demographics of Households with Disproportionate Housing Needs						
Disproportionate Housing Needs	**(Harrisonburg, VA CDBG) Jurisdiction**			**(Harrisonburg, VA CBSA) Region**		
Households experiencing any of 4 housing problems*	**# with problems**	**# households**	**% with problems**	**# with problems**	**# households**	**% with problems**
Race/Ethnicity						
White, Non-Hispanic	4,825	11,530	41.85	12,715	39,465	32.22
Black, Non-Hispanic	475	1,005	47.26	595	1,369	43.46
Hispanic	1,204	2,053	58.65	1,674	3,028	55.28
Asian or Pacific Islander, Non-Hispanic	425	635	66.93	530	795	66.67
Native American, Non-Hispanic	15	15	100.00	40	50	80.00
Other, Non-Hispanic	50	85	58.82	95	244	38.93
Total	6,990	15,330	45.60	15,640	44,945	34.80
Household Type and Size						
Family households, <5 people	1,990	6,835	29.11	6,460	25,225	25.61
Family households, 5+ people	720	1,110	64.86	1,905	4,065	46.86
Non-family households	4,285	7,395	57.94	7,275	15,655	46.47
Households experiencing any of 4 Severe Housing Problems**	**# with problems**	**# households**	**% with problems**	**# with problems**	**# households**	**% with problems**
Race/Ethnicity						
White, Non-Hispanic	3,235	11,530	28.06	7,090	39,465	17.97
Black, Non-Hispanic	280	1,005	27.86	339	1,369	24.76
Hispanic	832	2,053	40.53	1,222	3,028	40.36
Asian or Pacific Islander, Non-Hispanic	270	635	42.52	375	795	47.17
Native American, Non-Hispanic	15	15	100.00	15	50	30.00
Other, Non-Hispanic	50	85	58.82	69	244	28.28
Total	4,685	15,330	30.56	9,115	44,945	20.28

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).

Table 10 - Demographics of Households with Severe Housing Cost Burden						
Households with Severe Housing Cost Burden*	**(Harrisonburg, VA CDBG) Jurisdiction**			**(Harrisonburg, VA CBSA) Region**		
Race/Ethnicity	**# with severe cost burden**	**# households**	**% with severe cost burden**	**# with severe cost burden**	**# households**	**% with severe cost burden**
White, Non-Hispanic	2,920	11,530	25.33	6,150	39,465	15.58
Black, Non-Hispanic	260	1,005	25.87	315	1,369	23.01
Hispanic	260	2,053	12.66	480	3,028	15.85
Asian or Pacific Islander, Non-Hispanic	260	635	40.94	360	795	45.28
Native American, Non-Hispanic	15	15	100.00	15	50	30.00
Other, Non-Hispanic	50	85	58.82	65	244	26.64
Total	3,765	15,330	24.56	7,385	44,945	16.43
Household Type and Size						
Family households, <5 people	692	6,835	10.12	2,632	25,225	10.43
Family households, 5+ people	180	1,110	16.22	440	4,065	10.82
Non-family households	2,899	7,395	39.20	4,313	15,655	27.55

Note 1: Severe housing cost burden is defined as greater than 50% of income.

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: The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.
Note 4: Data Sources: CHAS

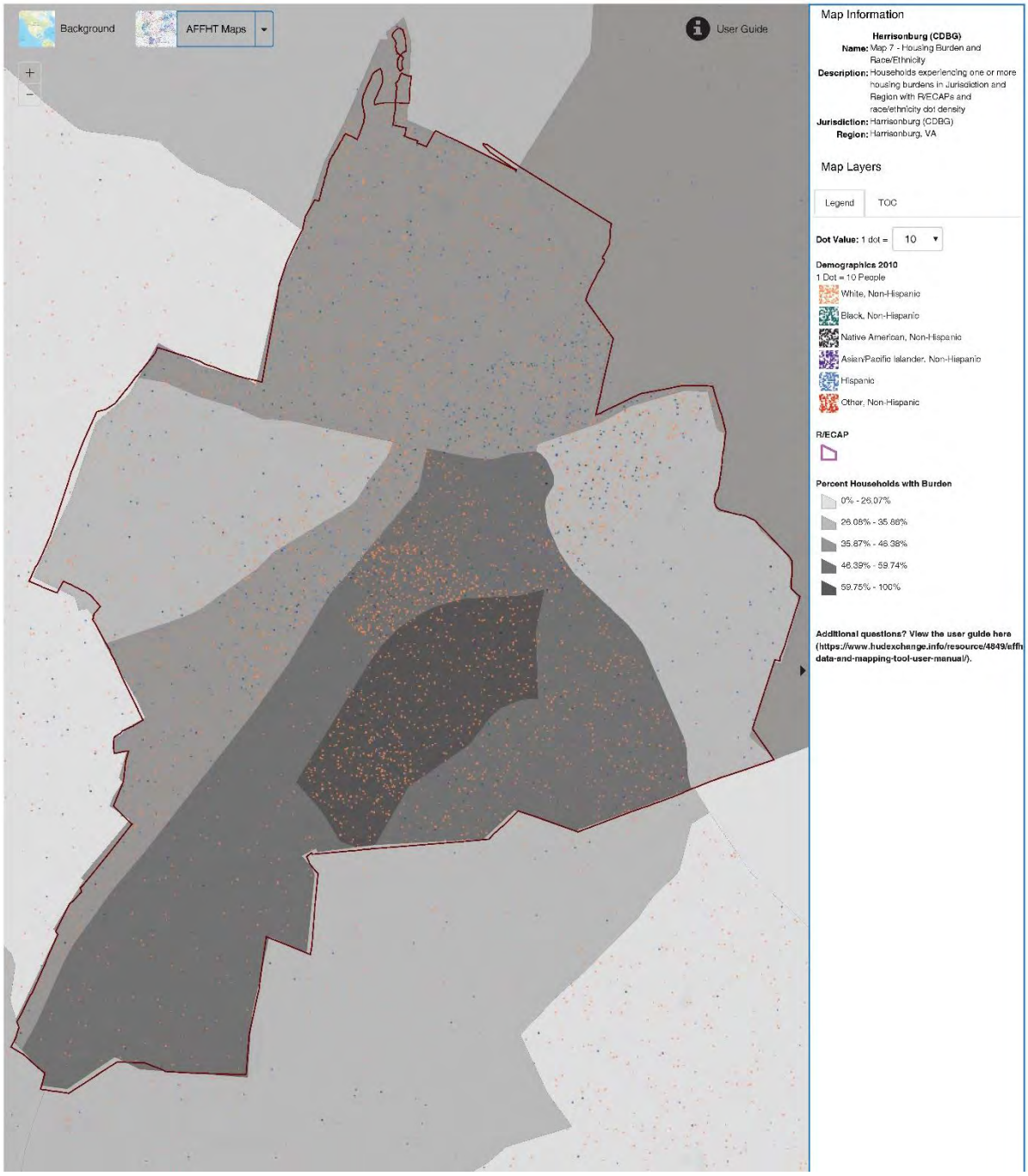
Note 5: Refer to the Data Documentation for details (www.hudexchange.info).

b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?

Central and southern Harrisonburg experience the highest rates of housing problems, particularly the census tract directly south of JMU (2.07). This tract is predominantly White with few foreign-born and residents with LEP.

The Downtown/Old Town/Reservoir area (tract 2.04), which is the single "concentration area" in the City and is highly segregated at the block group level between Whites and Hispanics, also has relatively high levels of housing problems.

Map 7 – Housing Problems and Race/Ethnicity



Map 8 – Housing Problems and National Origin

c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing.

Large families comprise about 7% of the households accounted for in Table 9, and about 10% of households with problems. Even given their small relative numbers, nearly 65% of large families, or roughly 720 households, experience at least one housing problem.

Households with children are more than half of those with a Housing Choice Voucher and more than one-quarter of those in a project-based development. Even so, there are more large family households with housing problems in the community than those currently receiving public assistance. This illustrates a greater need among families with children than HRHA can address.

Table 11 - Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children

	(Harrisonburg, VA CDBG) Jurisdiction							
	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
Housing Type	#	%	#	%	#	%	#	%
Public Housing								
Project-Based Section 8	219	53.16	127	30.83	62	15.05	111	26.94
Other Multifamily								
HCV Program	179	31.08	176	30.56	216	37.50	301	52.26

Note 1: Data Sources: APSH
Note 2: Refer to the Data Documentation for details (www.hudexchange.info).

d. Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.

Black and Hispanic households in Harrisonburg have at least two times lower homeownership rates than other racial/ethnic groups. Asian households are the most likely to own their homes, even more than all City residents overall.

In the greater region, Hispanics still have the lowest homeownership rate, followed by Blacks. Asian residents in the MSA, however, are less likely to be homeowners than White households, in contrast to the situation in the City.

A household is more likely to be a homeowner in the greater MSA than within Harrisonburg itself, regardless of race and ethnicity. This is influenced by the large student population, the majority of which are renters, living in the City.

Rate of Owner-occupied Housing be Race/Ethnicity

	(Harrisonburg, VA CDBG) Jurisdiction				
	Total	**White**	**Black**	**Hispanic**	**Asian**
Households	14,965	12,833	1,083	1,841	596
Owner occupied	5,770	5,085	216	271	278
Renter occupied	9,195	7,748	867	1,570	318
Ownership rate	38.56%	39.62%	19.94%	14.72%	46.64%
	(Harrisonburg, VA CBSA) Region				
Households	44,666	41,597	1,546	2,841	726
Owner occupied	27,970	26,675	530	710	360
Renter occupied	16,696	14,922	1,016	2,131	366
Ownership rate	62.62%	64.13%	34.28%	24.99%	49.59%

Note 1: Data Sources: 2006-2010 ACS

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.

According to one stakeholder, there has been an increase in new immigrants living in mobile home parks, often in substandard conditions. Mobile homes are also more likely to be marketed as "rent to own." Under this model, the title remains with the seller until the purchase price is met by the buyer under the particular terms. This means that the buyer does not build equity in the home over time but is responsible for the upkeep and maintenance of the property. According to local stakeholders, some mobile homes can turn over to new buyers every year or two, with the seller keeping the payments and title and the property condition continually deteriorating.

Given that persons with disabilities are discussed in Part D of this section, there is no known additional information regarding the disproportionate housing needs of other protected classes.

b. The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA's overriding housing needs analysis.

Of the 115 households on HRHA's waiting list, 75 (or 65%) are families with children, while only 5 are elderly and 2 have disabilities. This indicates a significant disproportionate need for housing assistance among families with children compared to other household types.

3. Contributing Factors of Disproportionate Housing Needs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs.

- ☑ The availability of affordable units in a range of sizes
- ☑ Lack of private investments in specific neighborhoods

C. Publicly Supported Housing Analysis

1. Analysis

a. Publicly Supported Housing Demographics

i. Are certain racial/ethnic groups more likely to be residing in one category of publicly supported housing than other categories (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and Housing Choice Voucher (HCV))?

As of 2009, the Harrisonburg Redevelopment and Housing Authority (HRHA) has converted all of its public housing units into project-based Section 8 units. HRHA currently owns and manages a total of 250 residential units including one affordable apartment building for seniors, a new apartment complex for homeless individuals, 129 townhomes for rent, and two small vacant sites.

Black and Hispanic households are more heavily represented in the tenant-based housing choice voucher (HVC) program than in HRHA project-based units. In terms of raw numbers, there are more than twice as many Hispanic households and over four times as many Black households with HVCs. Likewise, although the number of participating White households are about the same for each program, they account for a larger share of HRHA tenants than voucher holders because of the discrepancy for the other racial/ethnic groups.

Table 6 - Publicly Supported Housing Residents by Race/Ethnicity

	Race/Ethnicity							
(Harrisonburg, VA CDBG) Jurisdiction	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing								
Project-Based Section 8	307	76.37	28	6.97	56	13.93	8	1.99
Other Multifamily								
HCV Program	314	55.18	124	21.79	128	22.50	1	0.18
Income								
0-30% of AMI	2,600	79.63	285	8.73	130	3.98	190	5.82
0-50% of AMI	3,890	71.25	420	7.69	699	12.80	340	6.23
0-80% of AMI	5,535	69.80	585	7.38	1,308	16.49	400	5.04
Total	35,391	72.35	2,911	5.95	7,665	15.67	1,759	3.60

Note 1: Data Sources: Decennial Census; APSH; CHAS
Note 2: #s presented are numbers of households not individuals.
Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

ii. Compare the demographics, in terms of protected class, of residents of each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant category of publicly supported housing. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

Through comparison with Table 1, each racial and ethnic group is roughly represented in project-based Section 8 units as they are in the general population. In the HVC program, however, Blacks and Hispanics are overrepresented.

Households must earn less than 50% of the area median income to qualify for the HVC program. The households that fit this description have a very similar racial and ethnic breakdown as the general population.

Table 1 - Demographics

	(Harrisonburg, VA CDBG) Jurisdiction	
Race/Ethnicity	**#**	**%**
White, Non-Hispanic	35,391	72.35
Black, Non-Hispanic	2,911	5.95
Hispanic	7,665	15.67
Asian or Pacific Islander, Non-Hispanic	1,759	3.60
Native American, Non-Hispanic	67	0.14
Other, Non-Hispanic	112	0.23

Note 1: All % represent a share of the total population within the jurisdiction or region
Note 2: Data Sources: Decennial Census; ACS
Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

Qualifying Households by Race

(Harrisonburg, VA CDBG) Jurisdiction	
	% of Households w/ Income <50% HAMFI
White, Non-Hispanic	72.31%
Black, Non-Hispanic	7.71%
Hispanic	12.83%
Asian, Non-Hispanic	6.24%

Note 1: Data Sources: CHAS

b. Publicly Supported Housing Location and Occupancy

i. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs.

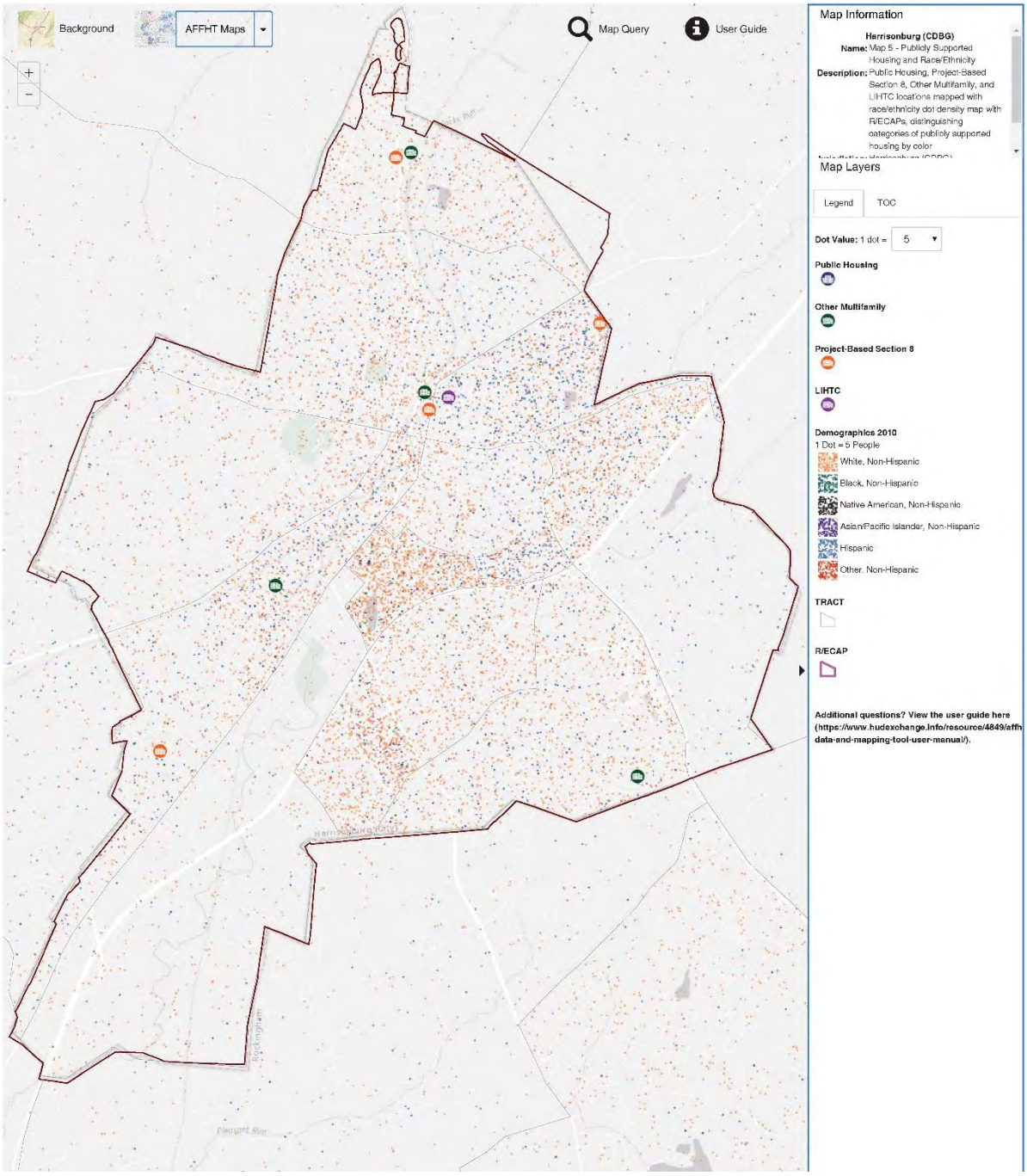
There are no R/ECAPs in Harrisonburg as defined by HUD's AFFH tool. Using the alternative definition described in section (V)(B)(ii), there are still no publicly assisted developments directly within "concentration areas", or within the most segregated areas of the City.

There is one small cluster of publicly supported developments on the northern edge of Downtown. This is somewhat close to the Old Town and Reservoir neighborhoods (census tract 2.04) and in an area with a relatively high percentage of non-White residents.

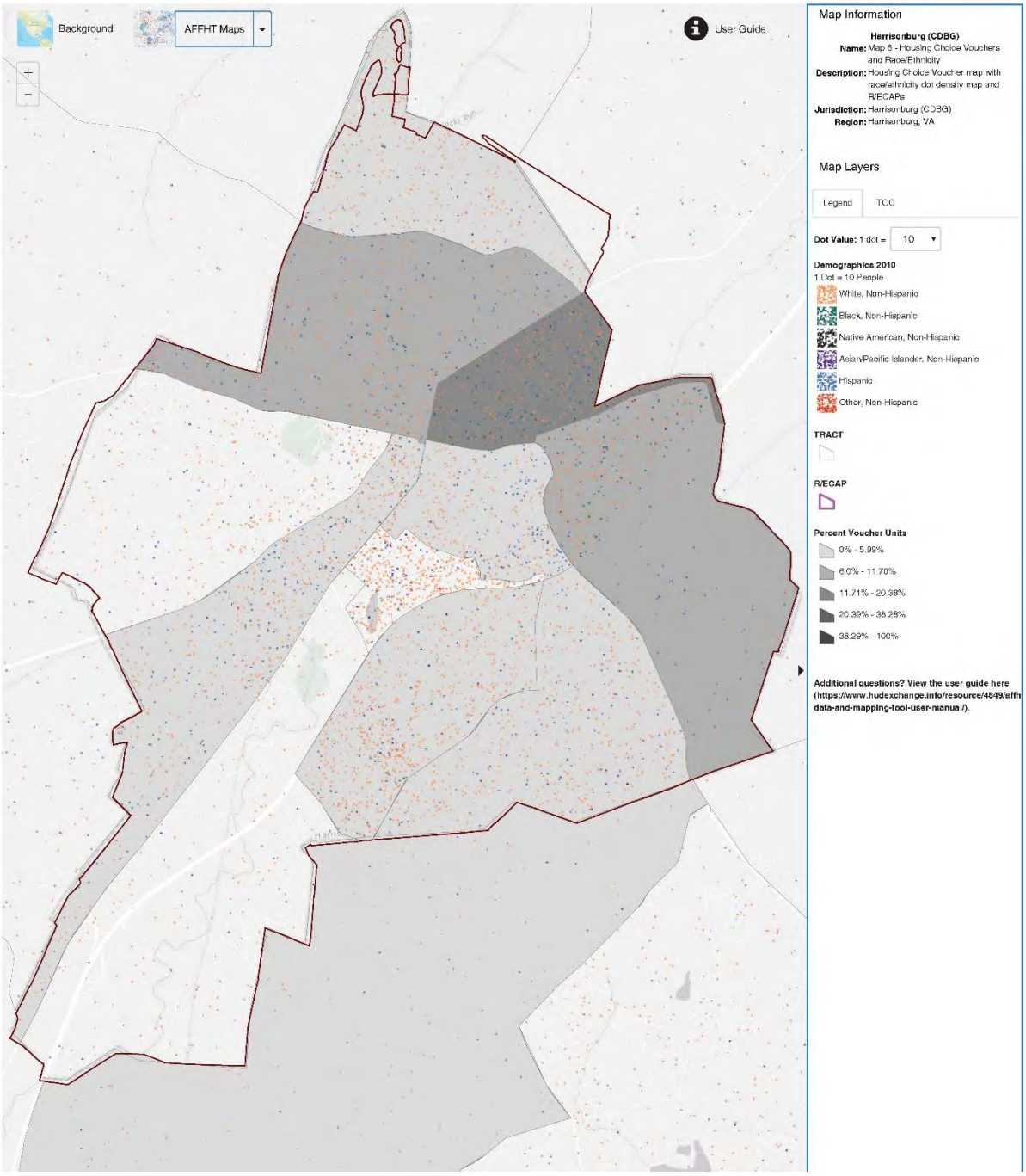
However, on the whole the Project-Based Section 8, LIHTC, and Other Multifamily developments identified by HUD's AFFH tool are reasonably dispersed throughout the City. This is thanks primarily to HRHA's active disposition of large multi-unit projects in favor of smaller developments and scattered sites.

HCV holders, on the other hand, are plainly concentrated in the Northeast neighborhood of Harrisonburg (tract 1.01). This area has high non-White, Hispanic, foreign-born, and renter populations. It is in the mid-range of the City for low-income and foreign-born households.

Map 5 – Publicly Supported Housing and Race/Ethnicity



Map 6 – Housing Choice Vouchers and Race/Ethnicity



ii. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs?

HRHA has the following age-restricted developments:

- J.R. "Polly" Lineweaver Apartments: 61 studio and one-bedroom units
- The Lineweaver Annex: 60 units, elderly or disabled

the following developments available for families:

- Franklin Heights: 30 two- and three-bedroom units
- Harrison Heights: 40 units
- Forkovitch Properties: 25 three- and four-bedroom units
- Scattered Single-Family Homes: 4 units
- Other Scattered Sites: 28 units

and the following developments for residents with disabilities:

- The Lineweaver Annex: 60 units, elderly or disabled
- Commerce Village: 30 units for homeless people with mental and physical disabilities

The Lineweaver Apartments and Annex, which account for the majority of units dedicated to elderly and disabled residents, is located at the northern end of Downtown. Although this is near to Harrisonburg's "concentration area," predominantly Hispanic neighborhoods, and two other publicly assisted developments, this is a very convenient location from which elderly and disabled residents can access services and amenities.

iii. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs?

Because there are no R/ECAPs as defined by HUD's AFFH tool, Table 7 provides no information about HRHA residents in R/ECAP and non-R/ECAP tracts.

Table 7 - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category

(Harrisonburg, VA CDBG) Jurisdiction	Total # units (occupied)	% Elderly	% with a disability*	% White	% Black	% Hispanic	% Asian/ Pacific Islander	% Families w/ children
Public Housing								
R/ECAP tracts								
Non R/ECAP tracts								
Project-based Section 8								
R/ECAP tracts								
Non R/ECAP tracts	402	54.13	22.82	76.37	6.97	13.93	1.99	26.94
Other HUD Multifamily								
R/ECAP tracts								
Non R/ECAP tracts	0							
HCV Program								
R/ECAP tracts								
Non R/ECAP tracts	609	10.42	21.18	55.18	21.79	22.50	0.18	52.26

Note 1: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household.
Note 2: Data Sources: APSH
Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

iv. (A) Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category? Describe how these developments differ.

Since all of HRHA's units have been converted to project-based Section 8, there is no way to make this comparison.

B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing.

The racial and ethnic composition of the four developments included in Table 8 are not out of line for the City as a whole.

Table 8 - Demographics of Publicly Supported Housing Developments, by Program Category

Project-Based Section 8			
(Harrisonburg, VA CDBG) Jurisdiction	**Project-Based Race/Ethnicity (%)**		**Project-Based Households with Children (%)**
Mosby Heights	White	79	48
	Black	8	
	Hispanic	8	
	Asian	6	
Harris Gdns Sec Ii	White	46	60
	Black	13	
	Hispanic	39	
	Asian	1	
Heritage Haven	White	92	0
	Black	2	
	Hispanic	4	
	Asian	1	
J.R. Polly Lineweaver	White	75	0
	Black	11	
	Hispanic	9	
	Asian	2	

Note 1: For LIHTC properties, this information will be supplied by local knowledge.
Note 2: Percentages may not add to 100 due to rounding error.
Note 3: Data Sources: APSH
Note 4: Refer to the Data Documentation for details (www.hudexchange.info).

v. Compare the demographics of occupants of developments, for each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. Describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

Most publicly supported developments are primarily occupied by White households, as is the City of Harrisonburg. The only notable deviance of the occupants' demographics from the corresponding census tract is the underrepresentation of Hispanics in some HRHA developments. The one development with a comparatively large Hispanic and small White population, Harris Gardens, also has the highest percentage of families with children.

Table 8 - Demographics by Publicly Supported Housing Developments, by Program Category

Development name	Program category	# Units in Project	% Project head of household race/ethnicity				% Households with children in development
			White	Black	Hispanic	Asian	
Heritage Haven	Project-Based Section 8	146	92	2	4	1	0
J.R. Polly Lineweaver	Project-Based Section 8	57	75	11	9	2	0
Harris Gdns Sec Ii	Project-Based Section 8	99	46	13	39	1	60
Mosby Heights	Project-Based Section 8	110	79	8	8	6	48

Table 8 - Demographics by Publicly Supported Housing Developments, by Program Category

Development name	Census Tract number	% Census Tract race/ethnicity				Census Tract poverty rate
		White	Black	Hispanic	Asian	
Heritage Haven	51660000401	83.39	5.67	6.34	2.80	6.13
J.R. Polly Lineweaver	51660000402	67.05	6.29	22.27	1.91	33.33
Harris Gdns Sec Ii	51660000101	47.66	15.10	31.58	2.03	18.83
Mosby Heights	51660000302	65.40	6.15	21.77	3.48	28.83

c. Disparities in Access to Opportunity

i. Describe any disparities in access to opportunity for residents of publicly supported housing, including within different program categories (public housing, project-based Section 8, Other HUD Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.

There does not appear to be a significant disparity in access to opportunity between residents of publicly supported housing and the general public, or between residents of different types of publically supported housing. HRHA's reliance on project-based vouchers and scattered sites has not resulted in a concentration of publicly supported units in any of the City's higher segregation or lower opportunity census tracts.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.

According to HRHA's 2105 Market Analysis, the Authority's waiting list totals 1,039 households. Most are seeking two-, three-, and one-bedroom units. Approximately 93% of all households on the HRHA waiting list have incomes under $24,000, and over half have incomes under $10,000. Income data is not separated by age category, but the largest group is clearly for families.

HRHA estimates that around half of its HCVs are used outside of Harrisonburg in Rockingham County.

b. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or mobility programs.

All HRHA tenants who are not elderly or disabled participate in a 5-year family self-sufficiency program designed to transition them out of HRHA managed units and into private sector housing. Those residents that do not graduate receive a Housing Choice Voucher (HCV). Through either outcome, HRHA residents are encouraged to more fully integrate into the community.

HRHA owns two sites within the City that could be developed for low-income housing: 111-115 Reservoir Street and 650-651 E Gay Street/364 Hill Street.

HRHA faced vocal community opposition during the planning phase of a new project-based development. This opposition cause HRHA to find an alternate location for the

project, which is now called Commerce Village and serves homeless people with mental and physical disabilities.

3. Contributing Factors of Publicly Supported Housing Location and Occupancy

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

- ☑ Community opposition

D. Disability and Access Analysis

1. Population Profile

a. How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?

Persons with disabilities are dispersed throughout the City, with slight geographical variations in the concentrations of this protected class. Northern and eastern neighborhoods, most notably census tracts 1.01, 1.02, and 4.01, have the highest concentrations of individuals with disabilities, while neighborhoods south and west of Downtown have much lower concentrations.

Neighborhoods with a larger non-White population tend to have a greater concentration of persons with disabilities compared to predominately White areas of the City. Similarly, excluding university housing areas, neighborhoods with higher poverty levels also have larger concentrations of persons with disabilities.

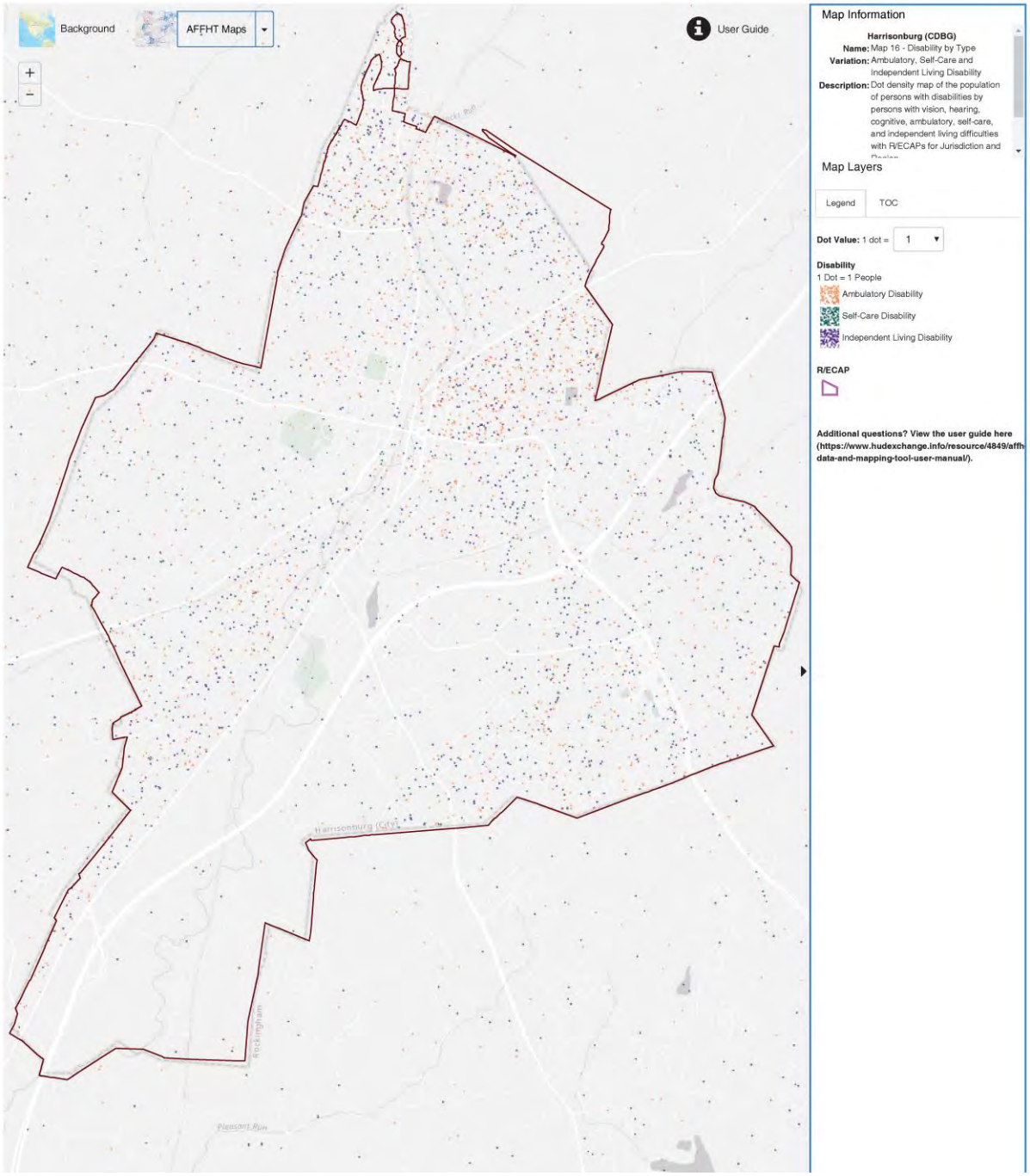
The Harrisonburg, VA CBSA has a slightly higher disability rate than the City. Generally, the outer edges of the region have higher concentrations of individuals with disabilities. The northwestern corner of Rockingham County has a significantly higher proportion of disabled residents than the rest of the region.

Table 13 - Disability by Type

	(Harrisonburg, VA CDBG) Jurisdiction		(Harrisonburg, VA CBSA) Region	
Disability Type	**#**	**%**	**#**	**%**
Hearing difficulty	821	1.76	3,410	2.88
Vision difficulty	420	0.90	1,951	1.65
Cognitive difficulty	1,145	2.45	4,217	3.56
Ambulatory difficulty	1,430	3.07	6,440	5.43
Self-care difficulty	679	1.46	2,714	2.29
Independent living difficulty	1,155	2.48	4,657	3.93

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).

Map 16 – Disability by Type



b. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges.

In the City, geographic patterns vary slightly between types of disability. Individuals with cognitive and vision disabilities, for example, are more likely to live in the City's northern and eastern neighborhoods (tracts 1.01 and 2.05). Hearing disabilities are more common in the western part of the City.

Ambulatory, self-care, and independent living disabilities are a rare characteristic of residents who live near JMU and in the southern parts of the City, likely due to a large student population with a low median age. Census tract 1.01 has the highest concentration of individuals with ambulatory disabilities. There are no significant concentrations of individuals with self-care and independent living disabilities.

Citywide, the 18-64 age group has the highest proportion of individuals with disabilities (3.31%), followed by individuals aged 65 and older (2.47%) and children aged 5-17 (0.35%). Census tracts 1.01 and 1.02 have the highest concentrations of children with disabilities. There are no significant concentrations of individuals with disabilities by other age groups within the City.

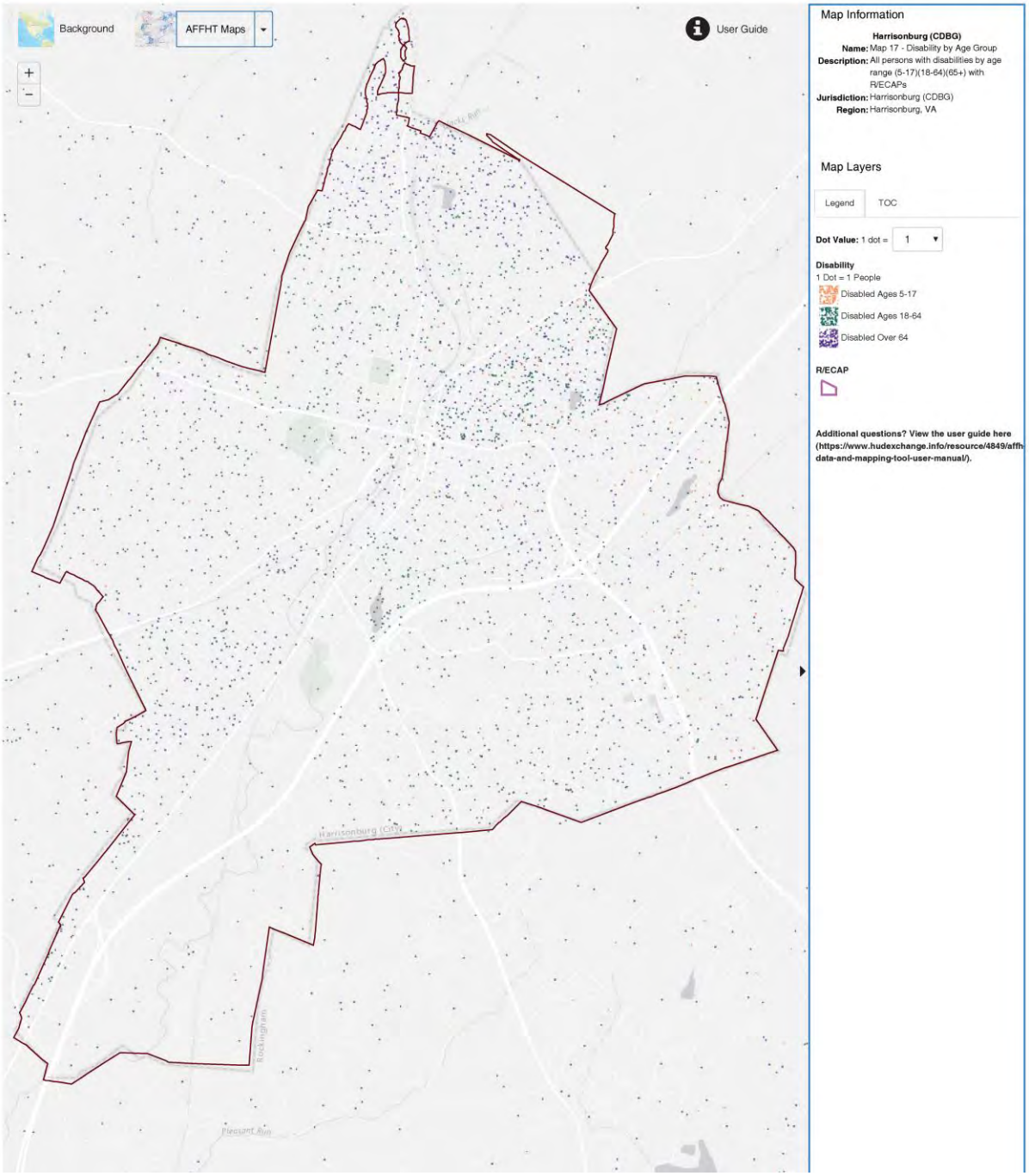
Regionally, there is little variation in the geographic dispersion of individuals with disabilities between age groups and by type of disability. Overall, ambulatory and hearing difficulties are the most common type of disability.

Table 14 - Disability by Age Group

	(Harrisonburg, VA CDBG) Jurisdiction		(Harrisonburg, VA CBSA) Region	
Age of People with Disabilities	**#**	**%**	**#**	**%**
age 5-17 with Disabilities	162	0.35	875	0.74
age 18-64 with Disabilities	1,544	3.31	5,852	4.94
age 65+ with Disabilities	1,154	2.47	5,329	4.50

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).

Map 17 – Disability by Type



2. Housing Accessibility

a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.

The Harrisonburg Redevelopment and Housing Authority (HRHA) commissioned a housing market study in late 2015 as part of its planning and development efforts. This study, conducted by a professional real estate consulting firm, found that there is a limited supply of affordable housing in the City and, most notably, a pent-up demand for age-restricted affordable housing. The study also found that affordable housing is in short supply in the region overall: all of the 249 housing units owned and managed by HRHA and the 811 privately-owned affordable housing units are fully-occupied, and many have long waiting lists.

Most single-family housing, which accounts for over half of Harrisonburg's housing stock, is generally not accessible to persons with disabilities. The Fair Housing Act requires that most multi-family properties built after 1991 meet federal accessibility standards, but well over 60% of the City's housing stock was built before this time. Additionally, municipal staff who attended stakeholder meetings during the development of this AFH stated that the state's building codes have only recently caught up to the federal accessibility standards. Specific data on privately-owned affordable, accessible housing is unavailable.

Although the market study did not specifically examine the supply and demand of accessible housing, it is reasonable to conclude that these findings indicate that neither the City nor region has an adequate supply of affordable, accessible housing in a range of unit sizes.

b. Describe the areas where affordable accessible housing units are located. Do they align with R/ECAPs or other areas that are segregated?

HRHA currently owns and manages 60 affordable, accessible housing units in the J.R. Polly Lineweaver complex at 265 North Main Street in downtown Harrisonburg. HRHA has also recently constructed a 30-unit Permanent Supportive Housing Project for homeless people with cognitive and physical disabilities northeast of Downtown. These neighborhoods are not within the City's locally-designated "concentration area," but they do have higher concentrations of poverty and non-White individuals than the City overall.

The location of other publicly supported housing is more dispersed, and does not appear to align with segregated areas.

As described in question (2)(a), specific data on privately-owned affordable, accessible housing is unavailable.

c. To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing?

Citywide, 22.82% of Project-Based Section 8 residents and 21.18% of Housing Choice Voucher holders have a disability. Regionally, these figures are 24.29% and 20.62%, respectively. Data is not available for type of disability or for other types of assisted housing.

The available figures indicate that at least some of the affordable housing stock is accessible. However, given that all of the publicly-supported housing units in the City and region are fully-occupied, individuals with disabilities may have to wait a long time to actually access these units.

Other policies and practices that impact individuals' ability to access publicly supported housing include:

- Website accessibility – HRHA's website (http://www.harrisonburgrha.com/) is not accessible to individuals with visual impairments per W_3C Web Accessibility guidelines.
- Admissions and Continued Occupancy Policies (ACOP) – HRHA gives a preference to local residents and individuals with physical and cognitive disabilities in its programs.
- Outreach to Improve Disabled Accessibility – HRHA notifies HCV participating and non-participating property owners of the need for accessible units and encourages those with accessible units to make them available under the program.

Table 15 - Disability by Publicly Supported Housing Program Category

(Harrisonburg, VA CDBG) Jurisdiction	People with a Disability*	
	#	%
Public Housing		
Project-Based Section 8	94	22.82
Other Multifamily		
HCV Program	122	21.18
(Harrisonburg, VA CBSA) Region		
Public Housing		
Project-Based Section 8	103	24.29
Other Multifamily		
HCV Program	153	20.62

Note 1: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.
Note 2: Data Sources: ACS
Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

3. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

a. To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

Persons with disabilities live throughout the City and the region. The few pockets that are closest to being "segregated" are chiefly due to publicly supported housing that is designated for persons with disabilities, group homes, nursing homes, or other similar facilities.

Housing Choice Voucher holders are able to use their vouchers throughout the community, with sufficient choice and integration compared to non-disabled voucher holders. However, there are also larger, affordable private developments, such as Mosby Heights and Harris Gardens, which cater to HCV holders and may have higher concentrations of low-income persons with disabilities than the surrounding neighborhoods.

b. Describe the range of options for persons with disabilities to access affordable housing and supportive services.

Finding affordable housing is a principle barrier faced by persons with disabilities. According to staff of Valley Associates for Independent Living (VAIL), affordable housing is a much more pressing issue for this population than obtaining any necessary accessibility modifications from landlords.

Accessing certain supportive services, community facilities, employment, and other amenities can be challenging for persons with disabilities. One prominent example mentioned by local stakeholders was the University of Virginia Health System located in Charlottesville, 1 to 1.5 hours away by car. For many Harrisonburg residents with disabilities, this is the closest medical facility that provides the services they need. Even smaller doctors' offices located in Rockingham County can be difficult to reach by any means other than private transit.

4. Disparities in Access to Opportunity

a. To what extent are persons with disabilities able to access the following? Identify major barriers faced concerning:

i. Government services and facilities

The majority of City services are located in the new City Hall at 409 South Main Street, which was completed in 2015. This building is fully accessible to persons with disabilities. The local library, the main branch of the Massanutten Regional Library, is also fully accessible.

ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

Currently, many areas of the City lack sidewalks, curb cuts, and APS signals. However, the City is gradually installing sidewalks and curb cuts in older neighborhoods where they were not previously required, and traffic signals are replaced with APS signals when repairs are required. Additionally, the City is currently updating its Bicycle and Pedestrian Plan with the goal of ensuring that improvements are accessible to all users.

iii. Transportation

Harrisonburg's Paratransit Service provides wheelchair accessible service for trips within the City during regular service hours. As discussed earlier, bus service within the City is limited, especially during the summer and between semesters when the majority of JMU students are not in class. Although all City buses are wheelchair accessible, not all bus stops are.

Individuals with disabilities are disproportionately affected by the limited transportation options as they tend to rely heavily on public transit due to an inability to walk or bike to destinations or a lack of income to purchase a personal vehicle.

iv. Proficient schools and educational programs

Generally, children with disabilities attend their local school. When needed, the school district provides free transportation to another school. According to stakeholders, although Harrisonburg Public School buildings themselves are generally accessible to persons with disabilities, transportation routes to schools are not always accessible.

v. Jobs

Local agencies such as VAIL and state departments such as the Department for Aging and Rehabilitation Services (DARS) and the Department of Blind and Vision Impaired (DBVI) assist persons with disabilities in Harrisonburg to access jobs. However, many of the available jobs in the region, such as those in the large poultry processing industry, are physically demanding and are often unsuitable for individuals with disabilities. Stakeholders interviewed during the public outreach process noted that employers are often unaware of their legal obligation to make reasonable accommodations. Additionally, as discussed earlier, the limited availability of transportation makes it difficult for those with disabilities to access employment opportunities.

b. Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.

HRHA outlines its reasonable accommodation policies in its ACOP as follows, and provides requestors with a Request for Reasonable Accommodation form:

A. Is the requestor a person with disabilities? For this purpose the definition of person with disabilities is different than the definition used for admission. The Fair Housing definition used for this purpose is: A person with a physical or mental impairment that substantially limits one or more major life activities, has a record of such an impairment, or is regarded as having such an impairment. (The disability may not be apparent to others, i.e., a heart condition). If the disability is apparent or already documented, the answer to this question is yes. It is possible that the disability for which the accommodation is being requested is a disability other than the apparent disability. If the disability is not apparent or documented, the Harrisonburg Redevelopment and Housing Authority will obtain verification that the person is a person with a disability.

B. Is the requested accommodation related to the disability? If it is apparent that the request is related to the apparent or documented disability, the answer to this question is yes. If it is not apparent, the Harrisonburg Redevelopment and Housing Authority will obtain documentation that the requested accommodation is needed due to the disability. The Harrisonburg Redevelopment and Housing Authority will not inquire as to the nature of the disability.

C. Is the requested accommodation reasonable? In order to be determined reasonable, the accommodation must meet two criteria:

    1. Would the accommodation constitute a fundamental alteration? The Harrisonburg Redevelopment and Housing Authority's business is housing. If the request would alter the fundamental business that the Harrisonburg Redevelopment and Housing Authority conducts, then the request would not be reasonable. For instance, the Harrisonburg Redevelopment and Housing Authority would deny a request to have the Harrisonburg Redevelopment and Housing Authority do grocery shopping for a person with disabilities.

    2. Would the requested accommodation create an undue financial hardship or administrative burden? Frequently the requested accommodation costs little or nothing. If the cost would be an undue burden, the Harrisonburg. Redevelopment and Housing Authority may request a meeting with the individual to investigate and consider equally effective alternatives.

D. Generally the individual knows best what it is they need; however, the Harrisonburg Redevelopment and Housing Authority retains the right to be shown how the requested accommodation enables the individual to access or use the Harrisonburg Redevelopment and Housing Authority's programs or services.

If more than one accommodation is equally effective in providing access to the Harrisonburg Redevelopment and Housing Authority's programs and services, the Harrisonburg Redevelopment and Housing Authority retains the right to select the most efficient or economic choice. The cost necessary to carry out approved requests, including requests for physical modifications, will be borne by the Harrisonburg Redevelopment and Housing Authority if there is no one else willing to pay for the modifications. If another party pays for the modification, the Harrisonburg Redevelopment and Housing Authority will seek to have the same entity pay for any restoration costs. If the tenant requests as a reasonable accommodation that they be permitted to make physical modifications at their own expense, the Harrisonburg Redevelopment and Housing Authority will generally approve such request if it does not violate codes or affect the structural integrity of the unit. Any request for an accommodation that would enable a tenant to materially violate essential lease terms will not be approved, i.e. allowing nonpayment of rent, destruction of property, disturbing the peaceful enjoyment of others, etc.

There is no specific process for requesting a reasonable accommodation or accessibility modification in the City or region. Local and regional organizations such as Valley Associates for Independent Living (VAIL), Disability Law Center of Virginia, and Blue Ridge Legal Services assist individuals with requesting reasonable accommodations and accessibility modifications to address the barriers above.

c. Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities.

For the most part, the greatest difficulty faced by a person with a physical disability looking to buy a home is finding a unit that is already accessible or easily modified. Features such as no-step entries, bathrooms on the first floor, curb cuts, etc. are not always common features in Harrisonburg's housing stock.

5. Disproportionate Housing Needs

a. Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities.

In Harrisonburg in 2010, approximately 5.5% of the general public had some type of disability. In contrast, upwards of 21% of both HCV holders and HRHA tenants have a disability. According to the US Census, 25.8% of people with a disability in the City live below the poverty level, compared to 35.4% of people without disabilities. This disparity indicates that, although people with disabilities are not necessarily more likely to live in poverty, those that do live in poverty rely much more on publicly supported housing programs.

6. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region affecting groups with other protected characteristics.

Stakeholders conveyed the impression that although the City has been investing resources to improve the accessibility of pedestrian infrastructure Downtown, disabled residents still face many mobility challenges in other neighborhoods.

NIMBYism can occur in Harrisonburg for various reasons, although it does not seem to be a principle and consistent impediment to fair housing choice. One example where NIMBYism can be recurring, according to stakeholders, is against group homes.

b. The program participant may also describe other information relevant to its assessment of disability and access issues.

As mentioned earlier, stakeholders stated that the state's building codes have only recently caught up to the federal accessibility standards. This is not to say that Harrisonburg's Building Inspection Division is a barrier to ensuring qualifying housing units are built in compliance with appropriate construction and design standard. In fact, staff from VAIL reported that City inspectors work well with them, referring both residents who need guidance or assistance and developers looking to comply with the latest best practices. VAIL and the Building Inspection Division have also held joint fair housing trainings in the past.

7. Disability and Access Issues Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.

- ☑ Access to transportation for persons with disabilities
- ☑ Inaccessible sidewalks, pedestrian crossings, or other infrastructure
- ☑ Lack of affordable, accessible housing in range of unit sizes
- ☑ Lack of affordable, integrated housing for individuals who need supportive services

E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

1. List and summarize any of the following that have not been resolved: a charge or letter of finding from HUD concerning a violation of a civil rights-related law, a cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law, a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law, or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.

The Virginia Fair Housing Office (VFHO) reported seven fair housing complaints filed in Harrisonburg since 2011. Five of the cases were closed administratively, one because of an uncooperative complainant, and one after no finding of a violation.

HUD reported two cases filed in 2014. One received a finding of "no cause for determination" and the other was settled. Since January 2011, HUD has not issued any charges or findings of discrimination in any complaints in Harrisonburg, VA.

No other fair housing complaints, lawsuits, or violations within the jurisdiction are known.

2. Describe any state or local fair housing laws. What characteristics are protected under each law?

The Virginia Human Rights Act prohibits housing discrimination on the basis of race, color, religion, national origin, sex, pregnancy, childbirth or related medical conditions, age, marital status, or disability. Because of the four additional classes, persons in Virginia have greater protection under the state's fair housing law than under the federal Fair Housing Act.

The Virginia Fair Housing Law prohibits the following practices:

- Refusing to sell or rent after the making of a bona fide offer or refusing to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person because of race, color, religion, sex, national origin, elderliness, familial status, or disability;
- Discriminating against any person in the terms, conditions, or privileges of the sale or rental of a dwelling, or in the provision of services or facilities in connection therewith to any person because of race, color, religion, sex, national origin, elderliness, familial status, or disability;
- To make, print, or publish, or cause to be made, printed, or published any notice, statement, or advertisement, with respect to the sale or rental of a dwelling that

indicates any preference, limitation, or discrimination or an intention to make any such preference, limitation or discrimination based on race, color, religion, sex, national origin, elderliness, familial status, or disability;

- Representing to any person because of race, color, religion, sex, national origin, elderliness, familial status, or disability that any dwelling is not available for inspection, sale, or rental when such dwelling is in fact available;
- Denying any person access to membership or participation in any multiple listing service, real estate brokers' organization, or other service, organization or facility relating to the business of selling or renting dwellings, or to discriminate against such person in the terms or conditions of such access, membership, or participation because of race, color, religion, sex, national origin, elderliness, familial status, or disability;
- To include in any transfer, sale rental, or lease of housing, any restrictive covenant that discriminates because of race, color, religion, sex, national origin, elderliness, familial status, or disability or for any person to honor or exercise, or attempt to honor or exercise any such discriminatory covenant pertaining to housing;
- To induce or attempt to induce to sell or rent any dwelling by representations regarding the entry or prospective entry into the neighborhood of a person or persons of a particular race, color, religion, sex, national origin, elderliness, familial status, or disability.

In addition, the state law further stipulates additional actions that are prohibited as they relate to housing discrimination. These prohibitions include the following:

- Failing or delaying maintenance or repairs of sales or rental dwellings;
- Limiting the use of privileges, services, or facilities associated with a dwelling;
- Discouraging the purchase or rental of a dwelling or exaggerating drawbacks or failing to inform any person of desirable features of a dwelling or a community, neighborhood, or development;
- Communicating to any prospective purchaser that they would not be comfortable or compatible with existing residents of a community neighborhood or development;
- Assigning any person to a particular section of a community neighborhood or development or to a particular floor or section of a building;
- Denying or limiting services or facilities in connection with the sale or rental of a dwelling because a person failed or refused to provide sexual favors.

3. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

Housing Opportunities Made Equal of Virginia, Inc. (HOME) is a housing counseling organization and FHIP grant recipient. According to their 2015 Annual Report, HOME received 232 fair housing inquiries that resulted in the filing of eight administrative complaints with HUD or the Virginia Fair Housing Office with or on behalf of victims of housing discrimination. They provided fair housing education and training to 488 individuals across the state. These individuals included housing consumers, elementary school children, and housing industry or government staff. Additionally, they conducted three continuing education legal seminars for attorneys across the state. HOME's Center for Housing Education and Counseling provided direct services to 1,379 clients. For the year, HOME received over $2.47 million in revenue and support and spent $2.28 million in program services, 23% of which went to fair housing activities.

The mission of Piedmont Housing Alliance is "to create housing opportunities and build community through education, lending and development." Their services include housing counseling and other education, lending programs, and affordable housing development as a certified CHDO. In 2015, the Piedmont Housing Alliance helped over 835 home buyers through counseling and $8.5 million in down payment assistance; developed 64 single family homes; created or managed 395 affordable rental units; and provided financial education and a path to economic self-sufficiency to more than 3,700 clients.

Blue Ridge Legal Services (BRLS) provides free civil legal assistance to low-income residents of the Shenandoah Valley and Roanoke Valley of Virginia. Their legal assistance ranges from advice or brief service to ongoing representation in negotiations and litigation in state and federal courts and administrative agencies, depending on the needs of the client, the type of case, and available resources. According to an audit for the 2014 calendar year, BRLS provided $2.53 million in legal assistance.

Valley Associates for Independent Living, Inc. (VAIL) provides vocational and residential placement and support, and educational services to adults who have a documented disability. VAIL has partnered with the City of Harrisonburg on fair housing implementation and education.

VAIL is a member of the Virginia Building Code Officials Association and through this involvement has educated others, including local building inspectors, about fair housing. They have conducted workshops/trainings with local individuals, builders, consumers, and other social service agencies on fair housing laws. VAIL includes information on fair housing in a quarterly newsletter that gets mailed to over 1,400 individuals and businesses within the local community. The organization is a member of the local Continuum of Care. The City has a history of supporting VAIL through CDBG funding,

including $20,000 in 2004, $15,000 in 2005, $10,000 in 2007, $10,000 in 2009 and $10,000 in 2010.

The Virginia Fair Housing Office (VFHO) is a state-funded pubic agency that receives complaints from persons regarding alleged violations of the Fair Housing Act. VFHO does not conduct compliance reviews; rather, the complaints investigated by the office are either consumer- or Board-initiated complaints.

4. Additional Information

a. Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.

Under the Virginia Residential Landlord Tenant Act, in order for a tenant to file an assertion of substandard living conditions, all rent must be paid in full. This prevents the legal action of many low income tenants who may have missed one or more rent payments, withheld rent on their own in an attempt force the landlord to remedy the substandard conditions, or for some other reason. At the very least, intervening on behalf of low-income tenants before owed rent accumulates and this legal action is unavailable can be a challenge.

According to staff at Blue Ridge Legal Services, they must turn away approximately have of the applicants that request assistance from them. Of those who are helped, around half are underserved. This is due to a substantial lack of funding. Anecdotally, federal funding (which BRLS primarily receives through the Legal Services Corporation) is at its lowest level in 30 years. Additionally, BRLS no longer receives any funding from Virginia's IOLTA program, although at one time it was their second largest funding source.

b. The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.

CDBG staff has had discussions with City officials about the possibility of developing an informational campaign to encourage residents, including members of the protected classes, to participate in local government by submitting applications to serve on boards and commissions. Opportunities for both paid and unpaid local government positions are posted on the City's website, in City buildings, and on the local government television channel.

The City has set up a CDBG activity entitled "Fair Housing Activities" that includes $10,000 in funding that is to be used for fair housing seminars. City staff is currently working to determine which area of education is most greatly needed at this time.

The City has begun communication with the Piedmont Housing Alliance to schedule housing discrimination testing for both race and disability in Harrisonburg's rental housing market.

5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing enforcement, outreach capacity, and resources and the fair housing issues, which are Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs .For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

- ☑ Lack of resources for fair housing agencies and organizations

VI. Fair Housing Goals and Priorities

1. For each fair housing issue, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.

The contributing factors selected throughout this AFH were assigned three priority levels based on the amount and strength of the supporting evidence that initially identified the factor:

- High – factors that limit or deny fair housing choice or access to opportunity, as well as other factors that are urgent or establish a foundation for future actions
- Medium – moderately urgent or building on prior actions
- Low – limited impact on fair housing issues

The contributing factors are grouped by the same issues that organize the AFH, and some factors may appear for multiple issues.

Contributing Factor	Priority	Discussion
(B)(i) Segregation/Integration		
Community Opposition	**Medium**	HRHA faced vocal community opposition during the planning phase of a new project-based development. This opposition caused HRHA to find an alternate location for the project, which is now called Commerce Village and serves homeless people with mental and physical disabilities. The fact that strong community opposition, although uncommon to this degree in Harrisonburg, can derail an affordable housing project makes addressing this factor moderately urgent.
Lack of private investments in specific neighborhoods	Low	For the most part, new private, multi-family development in the City caters to JMU students. This means that some neighborhoods, particularly those close to JMU and other amenities sought by students, see a lot of private investment, while others do not. This private developer preference has not risen to the level of outright discrimination, but is trend in the housing market of which the City and HRHA should be aware.
Location and type of affordable housing	**High**	In addition to the type of affordable housing mentioned above, the location of affordable housing is a major influence citywide. Harrisonburg's most segregated neighborhood (tract 2.04) and the neighborhoods adjacent to it contain some of the more affordable rental options in the City. In addition, around half of HRHA's Housing Choice Vouchers are used outside the City in Rockingham County due to the increased affordability of units there.
(B)(ii) R/ECAPs		
Lack of private investments in specific neighborhoods	Low	See above.
Location and type of affordable housing	**High**	See above.
(B)(iii) Disparities in Access to Opportunity		
The availability, type, frequency, and reliability of public transportation	**High**	According to local stakeholders, Harrisonburg's transit system does not provide access to employment centers or certain critical community amenities such as the central post office in the City's southern area or the poultry processing facilities in the County. The Harrisonburg Department of Public Transportation's decision-making ability regarding hours and coverage are limited and tied heavily to the needs of the University, which are frequently mismatched with those of the protected classes in the community.
Lack of private investments in specific neighborhoods	Low	See above.

Contributing Factor	Priority	Discussion
Location of employers	**High**	This contributing factor is closely tied to others concerning public transportation. Numerous major employers are located outside the City limits, or are located within the City but outside the reach or convenience of the current bus routes. Access to decent employment is one of the most effective pathways to increased opportunities for low-income families.
Location and type of affordable housing	**High**	See above.
(B)(vi) Disproportionate Housing Needs		
The availability of affordable units in a range of sizes	**Medium**	Small families with fewer than five members are much less likely to have housing problems than large families and non-families, with a rate of problems a full 35 percentage points lower than large families within the City. Of the 115 households on HRHA's waiting list, 75 (or 65%) are families with children. Non-families experience the most severe cost burden. They are more than twice as likely to be severely cost-burdened as large families, and almost four times as likely as small families. These facts indicate a significant disproportionate need for housing assistance for both large families with children and small (i.e. single person) households compared to other household types.
Lack of private investments in specific neighborhoods	Low	See above.
(C) Publicly Supported Housing		
Community opposition	**Medium**	See above.
(D) Disability and Access		
Access to transportation for persons with disabilities	**Medium**	All of the issues regarding transit in Harrisonburg already discussed apply to persons with disabilities, although individuals with disabilities are disproportionately affected by the limited transportation options as they tend to rely heavily on public transit due to an inability to drive, walk, or bike to destinations or a lack of income to purchase a personal vehicle. Because all City buses are wheelchair accessible and paratransit services are available, this factor as it specifically applies to persons with disabilities involves building on prior actions to address transit needs at a more basic level.
Inaccessible sidewalks, pedestrian crossings, or other infrastructure	Low	Currently, many areas of the City lack sidewalks, handicap accessible curb cuts, and APS signals. However, the City is gradually installing sidewalks and curb cuts in older neighborhoods where they were not previously required, and traffic signals are replaced with APS signals when repairs are required. Additionally, the City is currently updating its Bicycle and Pedestrian Plan with the goal of ensuring that improvements are accessible to all users. Given that resources are already being devoted to mitigating this factor, the urgency to address it is low.

Contributing Factor	Priority	Discussion
Lack of affordable, accessible housing in range of unit sizes	**Medium**	Similar to transportation issues, persons with disabilities share a basic need for affordable housing with other low-income households. For the most part, the greatest difficulty faced by a person with a physical disability looking to buy or rent a home is finding a unit that is already accessible or easily modified. Things like no-step entries, bathrooms on the first floor, curb cuts, etc. are not always common features in Harrisonburg's housing stock.
(E) Fair Housing Enforcement, Outreach Capacity, and Resources		
Lack of resources for fair housing agencies and organizations	**High**	Just as funding for CPD programs around the country have been decreasing, there is a chronic underfunding of enforcement, investigation, and outreach agencies in Harrisonburg. Without sufficient enforcement resources, progress in affirmatively furthering fair housing will be extremely difficult.

2. For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.

Limited financial and staff resources preclude the City and HRHA from pursuing the resolution of every contributing factor identified in the AFH. Therefore, only contributing factors determined to be a High or Medium priority are addressed by one or more of the following goals.

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Expand housing choice and access to opportunity	Location and type of affordable housing The availability of affordable units in a range of sizes Lack of affordable, accessible housing in range of unit sizes	Segregation/Integration R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs Disability and Access	Continue to maintain a list of local publicly supported developments with expiring subsidies in order to identify partners and potential sources of funding for preservation. Require City planning staff to evaluate the impact on fair housing choice for every residential development proposal. Utilize incentives to encourage those that increase the supply of affordable housing in high opportunity areas and/or outside of "concentration areas." Reach out to private landlords to increase participation in the Housing Choice Voucher program, particularly those in higher opportunity neighborhoods. Maintain a list of "friendly" landlords who have accepted HCVs in the past on an ongoing basis.	City of Harrisonburg Harrisonburg Redevelopment and Housing Authority
Discussion: Fair housing is distinct from affordable housing. However, there is a great deal of overlap between the two issues. Fair housing experts and advocates, including those consulted in Harrisonburg, know that the most prevalent barrier to fair housing is unaffordability. To address the contributing factors related to the type and location of affordable housing, the City and HRHA will partner with the private market and other public organizations to increase the supply and variety of affordable housing in high opportunity neighborhoods.				

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Increase homeownership among low-income households and members of the protected classes	Location and type of affordable housing The availability of affordable units in a range of sizes Lack of affordable, accessible housing in range of unit sizes	Segregation/Integration R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs Disability and Access	Within the next five-year planning cycle, create a framework for providing down payment assistance for qualified first time homebuyers. Within the next three years, begin holding annual homebuyer education and financial literacy workshops.	City of Harrisonburg Harrisonburg Redevelopment and Housing Authority
Discussion: The City of Harrisonburg has a relatively low homeownership rate, especially among certain racial and ethnic groups. Particularly, Black and Hispanic households have at least two times lower homeownership rates than other racial/ethnic groups. Persons with physical disabilities looking to buy a home also face difficulty in finding a unit that is already accessible or easily modified. Increasing homeownership for protected classes not only helps these households build wealth and access opportunity, it relieves pressure from the rental market. The City and HRHA will coordinate to help qualifying HRHA residents and other low-income households in the City responsibly achieve homeownership.				
Improve the utility of public transit for low-income and disabled persons	The availability, type, frequency, and reliability of public transportation Location of employers Access to transportation for persons with disabilities	Disparities in Access to Opportunity Disability and Access	Within one year, identify any key community asset or major employer currently underserved by transit service. Within three to five years, adjust transit routes and schedules to provide improved access to the identified locations.	City of Harrisonburg
Discussion: Practical, economical transportation is an essential element of daily city life. For many low-income households and members of the protected classes, the available transportation options in Harrisonburg are inconvenient or costly enough to be unreasonable choices. The City will work together with the transportation department, JMU, Rockingham County, and local employers to assess the current effectiveness of public buses in addressing the needs of the low-income and protected classes, and adjust service accordingly to better reach key community assets.				

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Strengthen anti-discrimination investigation, enforcement, and operations	Lack of resources for fair housing agencies and organizations	Fair Housing Enforcement, Outreach Capacity, and Resources	Within two years, contract with a HUD-certified organization to conduct paired discrimination testing in the rental market. Within one year, conduct the four-factor analysis to determine the extent to which document translation is needed. Prepare a Language Access Plan if it is determined to be necessary. Annually train City and HRHA staff to refer callers about fair housing to the designated staff person. In addition, train all staff that interact with the public in techniques to communicate with those with language and/or cultural barriers.	City of Harrisonburg Harrisonburg Redevelopment and Housing Authority
Discussion: Any effort to affirmatively further fair housing can only go so far without effective and efficient investigation and enforcement of discriminatory actions. However, resources for these activities are already limited and are only becoming more so. HRHA and the City will ensure that discriminatory activity is properly investigated by a trained agency. In addition, HRHA and the City will evaluate and strive to improve the way they interact with the public in order to prevent unintentional barriers from occurring.				
Increase the level of fair housing knowledge and understanding among housing developers, real estate professionals, elected officials, and the general public	Community opposition	Segregation/Integration Publicly Supported Housing	Within six months, create a page on the City's website for fair housing resources. Partner with local organizations such as lending institutions, attorneys, realtors, etc. to host a fair housing community forum annually. Hold an annual fair housing training for elected officials, appointed boards, and department staff.	City of Harrisonburg Harrisonburg Redevelopment and Housing Authority
Discussion: While fair housing education and outreach are constant needs in any jurisdiction, the City and HRHA will work to improve the level of fair housing knowledge and understanding among local housing developers, real estate professionals, local elected officials, design and construction professionals, and the general public with a focus on members of the protected classes. In particular, HRHA and the City will focus on internal education and training to reduce the chances of creating impediments to fair housing within their own organizations. The City and HRHA will also partner with local organizations whose clients are hard to reach protected classes, such as NewBridges and Church World Services, to help citizens better understand their rights.				