

June 20, 2019

**TO: Mayor and City Council**  
**FROM: Heping Zhan, Assistant Director of Planning and Special Projects**  
**RE: HUD-Mandated Analysis of Impediments to Fair Housing Choice (AI)**

As a HUD CDBG (Community Development Block Grant) Entitlement Community, Lee's Summit is required to conduct an Analysis of Impediments to Fair Housing Choice every five years to be in compliance with the federal Affirmatively Furthering Fair Housing (AFFH) regulations. The Lee's Summit's next AI is due to HUD in August of this year, ahead of the City's submission of the 2020-2024 Consolidated Plan.

Under the current AI regulations, the AI report prepared by a local jurisdiction or regional consortium is not required to be officially adopted by ordinance or resolution by the local or regional governing body. However, the AI is required to be submitted to HUD and, once submitted, the City has the obligation to implement policies and strategies to address fair housing related issues identified in the AI report.

The primary goal of the AI is to identify impediments to fair housing choice and promote equal opportunities to housing, education, employment, services, and community amenities regardless of sex, age, race, origin, religion, income, marital status and disabilities. To achieve that goal, HUD requires its entitlement jurisdictions to conduct an AI, which covers the following:

1. Assessment of the City's past goals, actions and strategies
2. Fair housing analysis to identify:
  - a. Pattern of segregation/integration (of race, income, age, etc.)
  - b. Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs)
  - c. Disparities in access to opportunities (education, employment, transportation, low poverty exposure, environmental health)
  - d. Disproportionate housing needs
  - e. Publicly supported housing analysis
  - f. Disability and access analysis
3. Identification of contributing factors, more specifically, impediments to housing choice for the protected classes
4. Fair housing goals and strategies

AFFH and AI are not just about housing, nor are they just about affordable housing. They are about equal opportunities for all human needs for all members of the community and the surrounding region. The AI is required to cover the area of subject community as well as its surrounding region and future strategies and actions can be local and regional. The AI can take advantage of HUD provided data for analysis, which covers the following subject areas:

1. Population distribution by race/ethnicity

2. Race/Ethnicity trends
3. Population distribution and trends by national origin
4. Population distribution by limited English proficiency (LEP)
5. Publicly supported housing and race/ethnicity
6. Housing choice vouchers and race/ethnicity trends and patterns
7. Housing burdens by race/ethnicity
8. Housing burdens by national origin
9. Demographics and school proficiency
10. Demographics and job proximity
11. Demographics and labor market
12. Demographics and transit trips
13. Demographics and transportation cost
14. Demographics and poverty trends and patterns
15. Demographics and environmental health
16. Disability by type
17. Disability by age group

It is mandatory that the AI development process be a well-represented and well-engaged public process. A successful process should include consultation with all “stakeholders”, especially those protected classes and agencies, organizations, groups, and community leaders that serve the interests of these protected classes.

Following a year of open public process, Staff completed a draft AI report by the end of 2018. The final round of public engagement process included a public hearing hosted by the CEDC in May and a 30-day public review and comment period during May and June.

It is important to recognize that the AI process and the report have their limitations due to time constraints, availability of information, levels of public involvement and so forth. As a result, some of the expressed impediments through the public involvement could not be substantiated. The report clearly identifies these as areas that warrant further research.

Staff believes that the AI process and the report provide valuable information for the community to be aware of the fair housing issues and to work together to combat impediments to fair housing choice and equal access to opportunities.