



JACKSONVILLE HOUSING

ASSESSMENT OF FAIR HOUSING

EXECUTIVE SUMMARY

BACKGROUND

Title VIII of the Civil Rights Act of 1968, more commonly known as the Fair Housing Act, ensures protection of housing opportunity by prohibiting discrimination in the sale or rental of housing based on race, color, religion, sex, and national origin (the federally protected classes). The Act was amended in 1988 to include familial status and disability status as protected classes.

As a housing authority, Jacksonville Housing is required by HUD to complete an Assessment of Fair Housing (AFH). The AFH studies patterns of integration and segregation; racially and ethnically concentrated areas of poverty; disparities in access to opportunity; disproportionate housing needs; locations, occupancy, and policies for publicly supported housing; disability and access; and fair housing enforcement and outreach resources and activities. Based on the findings of this research, the AFH proposes fair and affordable housing strategies to overcome the identified fair housing issues.

COMMUNITY INVOLVEMENT

Public input from local residents and other stakeholders was a key component of the AFH research. Jacksonville Housing used a variety of approaches to achieve meaningful engagement with the community on fair housing topics. Advertisements for the community workshops, project website, and survey targeted the general public, as well as Jacksonville Housing residents, nonprofits, service providers, housing providers, and others working with low- and moderate-income households and special needs populations.

Community Workshops

Jacksonville Housing held four community workshops in August 2022 (two in-person and two virtual). 33 members of the public participated in the community workshops.

Community Survey

A community-wide survey on fair housing was available to the public via the Jacksonville Housing website. The survey was available from July through September 2022. A total of 38 responses were received from members of the public.

Stakeholder Interviews

The planning team also engaged with stakeholders representing a variety of perspectives through in-depth individual interviews. Eleven community stakeholders participated in an interview, representing a range of viewpoints, including fair housing organizations and agencies, public housing, local government, affordable housing, homeownership programs, neighborhood revitalization, parks and trails, floodplain and watershed management, green infrastructure, food access, education, financial services and career pathways, small businesses, lending and capital, refugee services, and others.

Focus Groups

Virtual focus groups were held with members of Jacksonville Housing's Resident Advisory Board (RAB) and participants in its Family Self Sufficiency (FSS) program. Eight residents participated in a focus group.



FAIR HOUSING ISSUES & CONTRIBUTING FACTORS

SEGREGATION AND INTEGRATION

From 2000 to 2020, the share of Jacksonville’s population that identifies as non-Hispanic white declined from 62.2% to 50.0% of the total population, corresponding with rapid growth of the city’s Hispanic population and some growth of the Black population. While increases in racial and ethnic diversity reduced residential segregation levels, segregation of Black and white residents has persisted at a moderate level.

Although Jacksonville is a racially and ethnically diverse city, the demographic composition of the city is uneven across neighborhoods. Black residents more heavily populate the central urban core of Jacksonville and, to a lesser extent, the wider portion of Jacksonville located west of the St. John’s River, also known as the Northwest Corridor. White residents more heavily populate the quadrant of Jacksonville located both south and east of the river, with Hispanic residents more heavily present in southern parts of the city. Notably, Black residents comprise the primary racial group in all of the county’s racially and ethnically concentrated areas of poverty, as discussed further in the following section. **Dissimilarity Index values also indicate that Black residents experience higher levels of residential segregation than other racial or ethnic groups in the area.**

DI Value	1990	2000	2010
Non-White/White	51.0	41.8	37.2
Black/ White	60.0	50.8	48.5
Hispanic/ White	19.7	23.0	23.6
Asian or Pacific Islander/ White	30.0	30.5	30.9

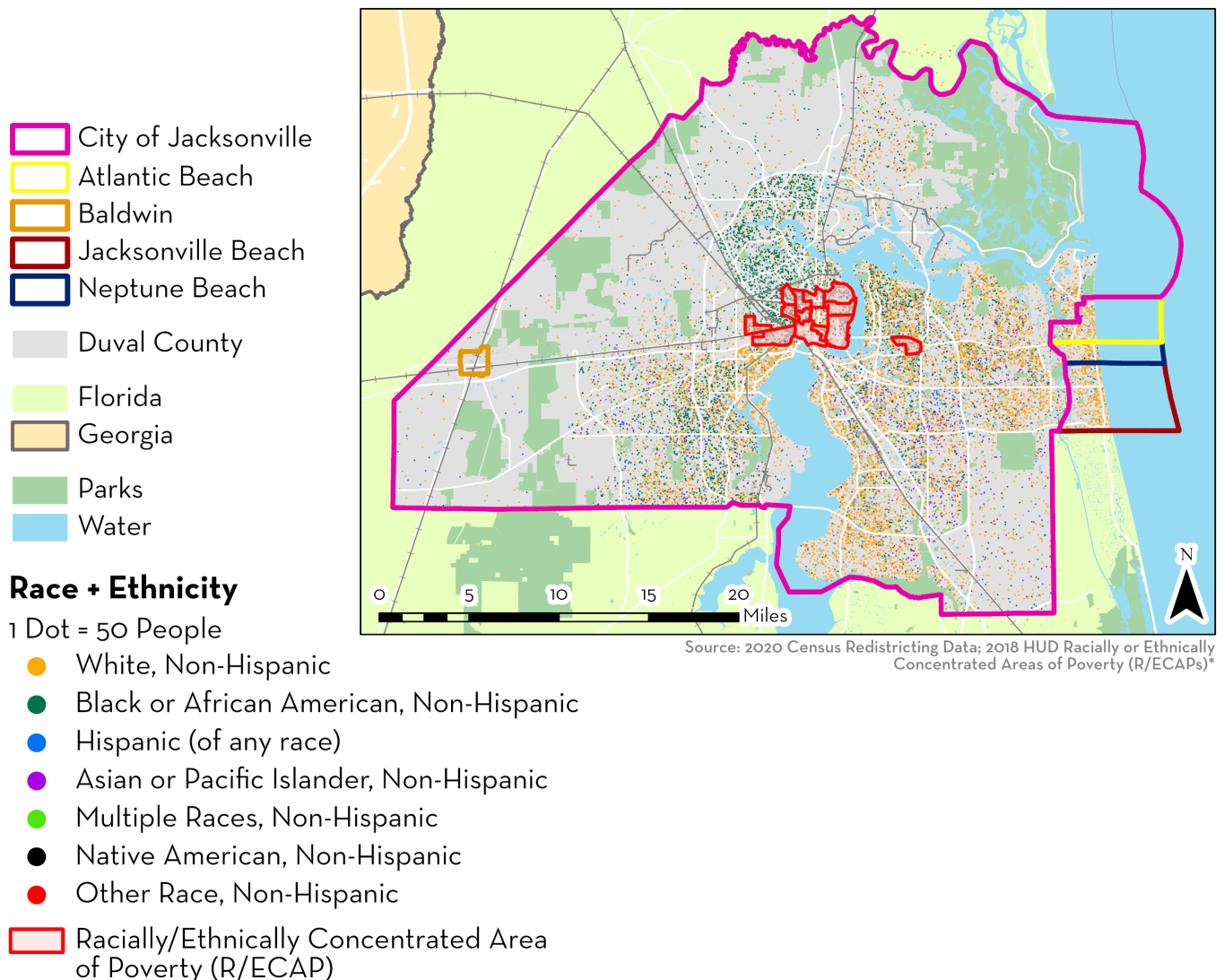
Source: HUD AFFH Mapping Tool. (Data available for 1990, 2000, and 2010 only).

In Jacksonville and Duval County, foreign-born residents and residents with limited English proficiency experience less geographic clustering than residents of specific races and ethnicities; however, both groups are still more heavily present in the southern and southeastern parts of Jacksonville. In particular, LEP speakers of Spanish and other Indo-European languages are clustered in south and east Jacksonville. Foreign-born residents from India are clustered in southeast Jacksonville, and foreign-born residents from the Philippines are clustered in south Jacksonville.

RACIALLY OR ETHNICALLY CONCENTRATED AREAS OF POVERTY

As of the 2016-2020 American Community Survey, 14 census tracts in the county had poverty rates above 36.9% (more than three times the poverty rate in the metro area of 12.3%). 13 of those 14 tracts fit the U.S. Department of Housing and Urban Development's definition of racially or ethnically concentrated areas of poverty (R/ECAPs), defined as census tracts in which 1) more than half of the population is non-white and 2) 40% or more of the population is in poverty, or the poverty rate is greater than three times the average poverty rate in the area, whichever is lower. These tracts are clustered in Jacksonville's central urban core, with one tract lying slightly to the east across the St. John's River.

Notably, Black residents make up the majority of the population in most R/ECAP census tracts, comprising over 50% of all residents in every R/ECAP tract but one. **Seven of the 13 R/ECAP tracts have populations that are more than 85% Black or African American, while Black residents make up just 29.1% of residents in Duval County as a whole**, indicating disparities in access to low-poverty neighborhoods by race and ethnicity. Census tracts with the lowest poverty levels are clustered in east and south Duval County and tend to have greater shares of white residents.



ACCESS TO OPPORTUNITY

Where people live shapes prospects for economic mobility and access to resources and services such as high-quality education; affordable transportation; a healthy environment; fresh, affordable food; and healthcare. However, neighborhood or housing choices are often limited by discrimination in housing markets or public policies that result in concentrated poverty, disinvestment, and a lack of affordable housing in neighborhoods with access to high-performing schools and jobs that pay living wages. In this way, limited housing choices reduce access to opportunity for many protected classes. In addition to proximity, access to opportunity is also shaped by economic, social, and cultural factors. For example, residents may live in locations with high numbers of jobs but may be unable to obtain them due to gaps in education or skills, a lack of reliable transportation, or childcare needs.

Residents of Jacksonville face disparities in access to opportunity in the following areas:

- **Proficient schools:** Jacksonville Housing's data on locations of public and assisted housing shows that public housing HCV-assisted housing is clustered in the urban core and west Jacksonville, areas which tend to have lower levels of access to proficient schools.
- **Jobs and labor market engagement:** Residents and stakeholders who participated in this planning process described several barriers that limit access to employment for residents of public and HCV-assisted housing, including an overall lack of affordable housing in the county, difficulty using vouchers and limited availability of public housing in some areas with high concentrations of jobs, and limited access to public transportation in some areas.
- **Transportation:** Stakeholders noted that residents often do not consider housing options in areas of the county without frequent bus service, and low levels of access and frequency of service often make it infeasible for residents to live in one area and work in another.
- **Low-poverty neighborhoods:** Data on locations of public housing and project-based voucher properties indicates clustering of these properties in areas of the county with higher levels of poverty and in R/ECAP census tracts.
- **Healthy environments:** Some census tracts in which public housing, project-based voucher properties, and voucher usage are clustered have moderate to high levels of need for parks, indicating a need for additional investment in parks, greenspace, and recreation facilities, particularly in tracts just outside of the urban core.



DISABILITY AND ACCESS

A lack of affordable accessible housing for persons with disabilities in the region was one of the most common issues noted by residents during community engagement and is supported by data and map analyses. In Jacksonville and Duval County, an estimated **13% of persons over the age of 5 have a disability**. The spatial distribution of residents with disabilities is similar to that of the county's total population, clustered in central Jacksonville, the Beaches, and Southside Jacksonville, with lower densities in northern Duval County. 2020 HUD data indicates that there are a total of nine Section 202/811 properties serving senior/disabled populations in Jacksonville. **Persons with disabilities also make up 28.6% of residents living in public housing** in Duval County and the Jacksonville MSA, indicating that these programs are a significant component of the area's supply of affordable and accessible housing. The high utilization of publicly supported programs for affordable and accessible units, as well as stakeholder input, demonstrate that **the need for accessible housing options in Jacksonville and Duval County is not met by the current supply**. Moreover, the location of affordable accessible housing is concentrated in the central region of Jacksonville, either within or adjacent to R/ECAPs, further limiting the housing options for persons with disabilities.

PUBLICLY SUPPORTED HOUSING

Duval County contains **2,322 units of public housing, 6,612 units subsidized by project-based Section 8, and 8,302 Housing Choice Voucher holders**. Although Black households make up 29.1% of the county and account for 45.6% of the county's very low-income population, 84% of voucher holders and 84% of public housing residents are Black. White households, by contrast, make up 51.8% of Duval County's population, but only 10% of voucher holders and 9% of public housing residents are white.

During conversations with community members receiving public housing assistance and other stakeholders in the field, policies related to assistance qualification and subsidies were frequently cited frustrations, as increases in household income might disqualify a household from assistance but would still not enable them to afford market rate rents in the area. Additionally, residents who receive public housing assistance shared frustrations about the condition of their units, such as poor insulation, pest infestations, and plumbing issues.



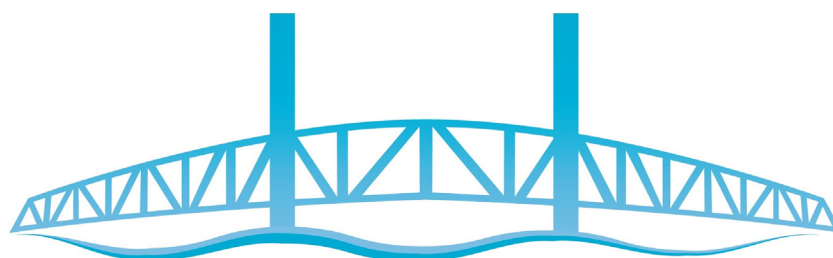
FAIR HOUSING ENFORCEMENT, OUTREACH CAPACITY, AND RESOURCES

Besides protections under the federal Fair Housing Act, residents of Jacksonville are protected from discriminatory housing practices by municipal and state level fair housing laws—the Jacksonville Fair Housing Ordinance and the Florida Fair Housing Act, respectively—which have both been deemed substantially equivalent to the rights, procedures, remedies, and enforcement affirmed via the FHA. Thus, complaints of housing discrimination are most often reported, investigated, mediated, and resolved locally through the work of either the Jacksonville Human Rights Commission as the local FHAP agency or Jacksonville Area Legal Aid, a private Fair Housing Initiatives Program (FHIP) grantee. **Most fair housing complaints processed by JHRC or JALA in the recent five-year period involve disability as a basis of discrimination and accessible, quality, affordable housing as the most cited challenge.**

A 2017 settlement agreement between the City and the Department of Justice brought reforms to the city's zoning and land use policies to offer more protection and housing opportunities for persons with disabilities needing supportive housing in an integrated, community-based setting. The city adopted a reasonable accommodation ordinance and removed discriminatory language from the zoning code regulating historic overlay zones and updated other zoning language to permit community residential homes for persons with disabilities in compliance with the Fair Housing Act.



JACKSONVILLE
HUMAN RIGHTS
COMMISSION



Jacksonville Area Legal Aid

The City of Jacksonville identified in its last Analysis of Impediments and 2021-2025 Consolidated Plan several impediments to affordable housing made worse by exclusionary zoning and land use regulations, among other causes, including: (1) a shortage of new multifamily rental development; (2) the accelerating rise in single family home prices; and (3) a shortage of handicapped accessible housing.

HOUSING NEEDS

To assess affordability and other types of housing needs, HUD defines **four housing problems**:

- 1. Cost burden:** A household has a cost burden if its monthly housing costs (including mortgage payments, property taxes, insurance, and utilities for owners and rent and utilities for renters) exceed 30% of monthly income.
- 2. Overcrowding:** A household is overcrowded if there is more than 1 person per room, not including kitchens and bathrooms.
- 3. Lack of complete kitchen facilities:** A household lacks complete kitchen facilities if it lacks one or more of the following: cooking facilities, refrigerator, or a sink with piped water.
- 4. Lack of complete plumbing facilities:** A household lacks complete plumbing facilities if it lacks one or more of the following: hot and cold piped water, a flush toilet, or a bathtub or shower.

Lack of complete kitchen or plumbing facilities is considered a severe housing problem, as are housing costs exceeding 50% of monthly income and crowding of 1.5 or more people per room.

DISPROPORTIONATE HOUSING NEEDS

In Jacksonville and Duval County, more than **one-third of households have one or more housing problems. Black and Latino households experience housing needs at disproportionately higher rates than whites in both Jacksonville and Duval County.** They are also disproportionately likely to be impacted by cost burdens and severe cost burdens, meaning that affordability is more likely to influence housing choice for these groups than for white households.

Additionally, **family households with more than 5 people were disproportionately likely to experience one or more housing problems** in Jacksonville and Duval County compared to family households of less than 5 people. Factors contributing to disproportionate housing needs include the availability of affordable units in a range of sizes and good condition, a lack of public/private investment in certain neighborhoods, and a lack of access to opportunity due to high housing costs.

One of the most cited issues among community members and stakeholders was an overall lack of affordable housing options in the Jacksonville region, which has become increasingly limited in the past few years. Certain neighborhoods were seen as more desirable than others due to increased perceptions of safety, cleanliness, and education/job opportunities, which was linked to geographic patterns of investment/disinvestment. Conversations with residents living in these neighborhoods revealed that issues regarding the physical conditions of housing units were frequent. This sentiment was further supported by our mapping analysis, which demonstrated that **households experiencing at least one of the four HUD-defined housing problems tend to be clustered around Jacksonville's central urban core, either within or near R/ECAP tracts.**

FAIR HOUSING GOALS AND ACTIONS

Jacksonville Housing identified the following fair housing goals based on the AFH research and findings. The goals will direct strategies to alleviate the fair housing issues and contributing factors described above.

Implement place-based community investment strategies to increase opportunity measures in R/ECAPs and formerly redlined areas

Low levels of access to resources and services in areas with higher levels of poverty—combined with moderate levels of segregation by race, ethnicity, and income—create barriers to access to opportunity in Jacksonville and Duval County. The need for neighborhood investment is particularly acute in the census tracts north of downtown Jacksonville, areas with the highest poverty rates and lowest levels of access to resources, such as fresh food retailers, high-quality parks and recreation spaces, and high-performing schools. Research and community input indicate that residents of R/ECAP census tracts, in which a large share of public housing is located, tend to have lower levels of access to high-quality neighborhood facilities, resources, and services. Recommendations related to this goal focus on bringing needed investment, community resources, and services into R/ECAPs and formerly redlined areas.

Support residents' engagement with the labor market

Disparities in labor market engagement are shaped by an overall lack of affordable housing in the county, difficulty using vouchers and limited availability of public housing in some areas with high concentrations of jobs, and limited access to public transportation in some areas. Place-based strategies can be combined with other approaches focused on closing skills gaps and developing career pathways, increasing job creation and quality standards, and raising the wage floor. In addition to continuing its Jobs Plus program, Jacksonville Housing should make efforts to understand and address residents' barriers to accessing these job programs, while also looking for opportunities to increase access to other intensive self-sufficiency services, such as through the Moving to Work Demonstration Program or the Purpose Built Communities program. The agency can also explore ways to partner with community organizations that have implemented workforce development and employment programs in close proximity to public housing.

Increase supply of affordable housing in good condition

Housing costs have increased significantly in Jacksonville and Duval County in recent years. An estimated 34.5% of all households in Duval County have a housing need, the majority of which relate to housing cost burden. An estimated 14.8% of all households spend more than 50% of income on housing and are considered severely housing cost burdened. To increase the supply of affordable housing in good condition, Jacksonville Housing can continue to develop new public and affordable housing through the Rental Assistance Demonstration (RAD) program and by using its S&P credit rating (expected in December 2022) to issue bonds in order to build or acquire new affordable housing. It may also work to ensure that requests for inspections of existing properties are addressed promptly and any necessary repairs are completed and documented.

Increase affordable, accessible housing options for persons with disabilities

One of the largest challenges people with disabilities face in Duval County is a lack of affordable, accessible housing options. To increase the supply of accessible housing, Jacksonville Housing can track HUD funding opportunities and apply for Special Housing Vouchers and Section 811 when announced. In addition to meeting required ADA standards in new construction, Jacksonville Housing should consider directing appropriate staff to evaluate and recommend specific universal design principles that can feasibly be integrated into future projects. Collaboration with disability advocacy organizations can help Jacksonville Housing better meet the needs of people with disabilities by bringing together resources and capacities to provide safe, affordable, and accessible housing with the features, resources, and services that people with disabilities may require.

Increase access to public, assisted, and affordable housing in areas with access to opportunity

Publicly assisted housing in the Jacksonville region is clustered in the urban core in and around census tracts designated as racially/ethnically concentrated areas of poverty, resulting in a narrower range of housing options for public and assisted housing residents and limiting the resources and services that residents can easily access. To increase access to public, assisted, and affordable housing in high-opportunity neighborhoods, Jacksonville Housing can continue to develop public housing through the Rental Assistance Demonstration (RAD) Project Based Voucher (PBV) program; support policies and programs that promote acceptance of Housing Choice Vouchers, such as source of income protection and landlord education/incentive programs; and partner with the City of Jacksonville and other stakeholders to support policies to increase affordable housing in higher-opportunity neighborhoods, such as inclusionary zoning and upzoning.

Increase HCV Program capacity and acceptance

Based on use statistics for Housing Choice Vouchers showing all available vouchers currently in use, the relatively diverse locations of voucher use, and the lack of affordability of housing in Jacksonville to families earning less than 50% AMI, one of the most effective ways to increase access to opportunity for low-income households would be to expand the capacity of the HCV program. Funding additional HCV would provide voucher holders with more choice in where they live than public housing or project-based Section 8 residences. In addition to expanding the HCV program, the Housing Authority should consider partnering with the City of Jacksonville, fair housing organizations, and others to support the addition of source of income protections to Jacksonville's Fair Housing Ordinance. To address barriers to landlord acceptance of vouchers, Jacksonville Housing should conduct a focus group with landlords to determine the greatest barriers to voucher acceptance, and consider possibilities for incentivizing landlord participation, such as compensation for damage claims and additional payments for vacancy loss, offering new landlords incentive payments to join the program, or subsidized repairs for HCV residences.

Support continued access to affordable housing as individuals and families increase incomes

Jacksonville Housing can address the housing needs of households earning above HUD's income limits for public and assisted housing by using its S&P credit rating (expected in December 2022) to issue bonds, possibly in combination with other funding sources such as Low Income Housing Tax Credits (LIHTC), to acquire and/or develop housing, with a particular focus on meeting the housing needs of households earning up to 80% of the area median income. The agency should also continue to monitor research on the Moving to Work Demonstration Program Rent Reform Demonstration and consider implementing policies that have been demonstrated to support residents in maintaining housing assistance while also increasing their incomes. For households that become disqualified, Jacksonville Housing should develop an assistance program to help in finding new housing, including support in areas such as security deposit assistance, moving assistance, and housing search assistance.

Reduce and limit the impact of community opposition to affordable housing development and acceptance of Housing Choice Vouchers

Community opposition to affordable housing development is a primary cause of the geographic clustering of publicly supported housing in racially and ethnically concentrated areas of poverty and low-income neighborhoods, and may also lead to discrimination against Housing Choice Voucher holders by landlords. NIMBY objections to the development of public and affordable housing, in combination with cumbersome public hearing processes, create additional cost and uncertainty for developers, and often slow down or halt the development of new housing. To address this issue, Jacksonville Housing can partner with the City of Jacksonville and other stakeholders to take advantage of statewide legislation that makes it easier for local governments to approve and incentivize affordable housing developments; address how zoning regulations limit missing middle and multifamily housing types; and support the development of an inclusionary zoning ordinance to increase the total supply of affordable housing while dispersing those affordable units into mixed-income, higher opportunity communities.

Support fair housing education and enforcement efforts

While several organizations and agencies provide fair housing education and enforcement in Jacksonville, residents and stakeholders indicated that a lack of resources relative to the high level of need limits the impact of these groups. Stakeholders noted a need for education for housing providers regarding fair housing responsibilities and liabilities. Additional fair housing outreach and capacity needs include increasing knowledge sharing and collaboration among fair housing organizations and housing providers and supporting residents' awareness of fair housing resources and rights. To support fair housing education and enforcement efforts, Jacksonville Housing can provide education to housing providers and property managers regarding their fair housing responsibilities and liabilities; disseminate community-oriented fair housing education materials, including information on resources available; and partner with fair housing organizations to host fair housing workshops and trainings and connect residents with affordable fair housing and legal services.