



JACKSONVILLE HOUSING

ASSESSMENT OF FAIR HOUSING



PREPARED BY
MOSAIC COMMUNITY PLANNING

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I. COVER SHEET

1. Submission Date:	
2. Submitter Name:	Jacksonville Housing
3. Type of Submission	Single public housing agency
4. Type of Program Participant(s):	PHA
5. For PHAs, Service Area:	Duval County
6. Submitter Members (if applicable):	
7. Sole or Lead Submitter Contact Information:	
a. Executive Director Name:	Dwayne Alexander
b. Title:	President and CEO
c. Department:	
d. Street Address:	1300 N. Broad Street
e. City:	Jacksonville
f. State:	FL
g. Zip Code:	32202
h. Email:	dalexander@jaxha.org
i. Phone Number:	
8. Period Covered by this Assessment:	2023-2027
9. Initial, Amended, or Renewal AFH:	Initial

10. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the PHA 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.

11. The PHA 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. §§ 903.7(o), and 903.15(d), as applicable.

Print Name

PHA / Title

Signature

Date

Print Name

PHA / Title

Signature

Date

Print Name

PHA / Title

Signature

Date

II. EXECUTIVE SUMMARY

A. SUMMARIZE THE FAIR HOUSING ISSUES, SIGNIFICANT CONTRIBUTING FACTORS, AND GOALS. ALSO INCLUDE AN OVERVIEW OF THE PROCESS AND ANALYSIS USED TO REACH THE GOALS.

Fair Housing Planning

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 Participation Process

Public input from residents and other stakeholders was a key component of the AFH planning process. Jacksonville Housing used a variety of approaches to achieve meaningful engagement with the community on the topics listed above. The agency hosted four virtual and in-person fair housing workshops for the general public with a total of 33 attendees. A community-wide survey on fair housing received 38 responses.

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.

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.

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. The project website provided an overview of the Assessment of Fair Housing, as well as information about community workshops, a link to the fair housing survey, maps detailing residential segregation and access to opportunity, and related resources. The website received more than 600 visits from July through September 2022. Public notice of community input opportunities was given to residents through announcements on Jacksonville Housing’s website and newsletters, and through emails to Jacksonville Housing residents and community stakeholders. Stakeholder interview invitations were sent to more than 60 contacts representing a variety of viewpoints, including elected officials and staff, housing authority staff, housing developers, nonprofit organizations, homeless housing and service providers, mental health service providers, organizations serving people with disabilities, family and senior services organizations, workforce development organizations, and others.

This Executive Summary provides a brief overview of the study’s key findings, followed by an outline of fair housing goals and related actions.

Fair Housing Issues and 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.

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

This study uses a methodology developed by HUD that combines demographic and economic indicators to identify racially or ethnically concentrated areas of poverty (R/ECAPs). These areas are defined as census tracts that have an individual poverty rate of 40% or more (or an individual poverty rate that is at least three times that of the tract average for the metropolitan area, whichever is lower) and a non-white population of 50% or more. Using a metric that combines demographic and economic indicators helps to identify a jurisdiction's most vulnerable communities.

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%). Thirteen 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 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.

DISPARITIES IN 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, detailed in Section V(D), 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. There is a need to continue to develop more public and affordable housing in areas with access to proficient schools and to increase acceptance of Housing Choice Vouchers in these areas to support access to proficient schools for all residents. Additionally, there is a need to implement strategies to meet the needs of students who attend the district’s lower-performing 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. Low levels of labor market engagement in areas of the county where public and assisted housing is clustered further limit employment opportunities.

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. Many of the county’s higher-opportunity areas have lower levels of access to public transportation, which creates barriers to locating in those areas for residents who rely on bus and other public transportation services.

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. Residents and stakeholders who participated in this planning process noted that housing choices are often limited by factors including a lack of affordable housing in many areas of the county, limited acceptance of vouchers by landlords, and voucher amounts that are not sufficient to cover market rate rents in many areas of the county. In this way, residents’ housing choices are often restricted to areas of the county with more affordable housing, which often coincide with areas of higher poverty.

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. Residents and stakeholders also emphasized that a combination of insufficient maintenance and investment in parks in lower-income neighborhoods and safety concerns in parks reduces residents' access to high-quality parks, greenspace, and recreation opportunities. The combination of uneven distribution of food outlets across the county, the substantial proportions of households with low incomes, and low levels of access to vehicles in some census tracts creates barriers to food access and security.

DISPROPORTIONATE HOUSING NEEDS

The AFH analyzes four unique housing problems defined by HUD: cost burden, overcrowding, dwellings lacking complete kitchen facilities, and dwellings lacking complete plumbing facilities. 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 are 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 are 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 issues with the inadequate physical conditions of housing units. This sentiment was further supported by mapping analysis, which demonstrated that households experiencing at 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.

DISABILITY AND ACCESS

In Jacksonville and Duval County, an estimated 13% of persons over the age of 5 have a disability. Ambulatory disabilities are the most common type in both the city and the county,

affecting 7.6% of city residents and 7.4% of the county's population. 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. These geographic patterns remain similar for all people with disabilities, regardless of type or age range. 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.

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. The rates of persons with disabilities assisted by JH's public housing and HCV programs are more than double the City of Jacksonville's disability rate, suggesting that these programs help address a significant need in a population that experiences significant difficulties accessing housing. However, there are not enough JH vouchers and properties to meet area demand, especially for residents with disabilities. 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.

Community members receiving public housing assistance and stakeholders working in housing and community development frequently noted frustrations around policies related to assistance qualification and subsidies, 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, negative perceptions about public housing were linked to inequalities across Jacksonville neighborhoods due to patterns of investment and disparities in access to opportunities. Lastly, 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. Consistent HUD funding through programs these has enabled collaboration and support among the local fair housing enforcement and advocacy organizations; the majority of meritorious claims to be processed and resolved through mediation or conciliation; and public outreach, education, testing, and trainings. 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. More education and training are needed on the front end—before a tenant’s disability is exacerbated or housing effectively denied—for developers, property managers, and landlords and permitting, licensing, and inspection authorities and agents of their respective fair housing responsibilities, accessible design and construction guidelines, and obligations triggered by reasonable accommodation requests.

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.

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 previously 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. Data from the American Community Survey, local plans and studies, the community survey conducted as part of this planning process, community input from meetings and stakeholder interviews, and other sources indicates that residents of the 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 racially and ethnically concentrated areas of poverty 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. Low levels of labor market engagement in areas of the county where public and assisted housing is clustered further limit employment opportunities. Place-based strategies allow for the targeting of resources and outreach efforts to areas with high proportions of residents whose housing choices may be limited by low earnings or unemployment. These 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. Examples of place-based strategies to increase labor market engagement include increasing awareness of high-growth jobs that pay family-sustaining wages, connections to the training necessary to obtain those jobs, and targeting neighborhoods with high proportions of low-earning workers as priorities for interventions that increase awareness of available subsidies and resources. Jacksonville Housing should continue to provide employment services through the Jobs Plus program and make efforts to understand and address residents' barriers to accessing these 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, such as LIFT JAX and LISC Jacksonville, that have implemented workforce development and employment programs in close proximity to public housing. Jacksonville Housing can also support labor market engagement in neighborhoods in which public housing is clustered by collaborating with community development organizations on efforts to bring new development to high-poverty neighborhoods to create jobs and provide needed resources and services, such as grocery stores.

Increase supply of affordable housing in good condition: Housing costs have increased significantly in Jacksonville and Duval County in recent years. An estimated 122,165 households (34.5% of all households) in Duval County have a housing need, the majority of which relate to housing cost burden, or spending more than 30% of income on housing. An estimated 52,610 households in the county (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. The City of Jacksonville identified in its latest Analysis of Impediments and 2021-2025 Consolidated Plan several impediments to affordable housing that are directly impacted or exacerbated by 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. Jacksonville Housing Authority does not have legislative power to override or amend the zoning ordinance, comprehensive plan, or other planning regulations and policies and must plan and develop housing within the existing regulatory framework. It can, however, work with its partners to advocate for more flexible zoning for missing middle and multifamily housing and work with the City to take advantage of recently enacted state law that gives local governments broad authority to approve and incentivize affordable housing development outside their normal zoning and comprehensive plan processes. Jacksonville Housing could be given first right of refusal for new affordable units created through the state-enabled approval process or units created through inclusionary zoning development incentives. If a proposed ordinance to expand accessory dwelling units goes through, Jacksonville Housing could work with the City on a program to protect those units for affordable housing and support and incentivize their development. Finally, because the condition and maintenance of public housing units is a frequently cited frustration among residents, Jacksonville Housing should ensure that requests for inspections of properties are addressed quickly and needed remediations are completed and documented.

Increase affordable, accessible housing options for persons with disabilities: People with disabilities face unique challenges in obtaining affordable, accessible housing. A large portion of this population lives off fixed income payments, and many require specific features or services in their housing units, depending on disability type. One of the greatest challenges this population faces in Duval County is a lack of affordable, accessible housing options. Publicly supported housing plays a key role in providing housing for people with disabilities in the county. However, the supply of accessible housing is insufficient to meet demand, and many fair housing discrimination cases in the county involve people with disabilities living in substandard conditions. 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. Researching the implementation results of the 2017 Consent Decree that was issued to the City of Jacksonville by the Department of Justice can provide valuable data on accessible housing practices to determine ongoing need (e.g., how many accessible units were created with the \$1.7 million grant, if a fair housing compliance officer still exists, if FHA/ADA training is ongoing).

Increase access to public, assisted, and affordable housing in areas with 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. Residents and stakeholders noted that increases in housing costs in Jacksonville have been especially pronounced in neighborhoods with higher performing schools, housing in good condition, neighborhood resources and services, and access to employment. Lower-income residents often must live in neighborhoods where housing is more affordable, but there are often trade-offs in housing quality and access to neighborhood resources and services. 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 Housing Choice Voucher Program capacity and acceptance: Based on use data for Housing Choice Vouchers showing that all available vouchers are 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 Housing Choice Voucher program. Housing Choice Vouchers provide voucher holders with more choice in where they live than do public housing or project-based Section 8 residences; however, residents and stakeholders noted that finding landlords who accept vouchers is difficult due to source of income discrimination. To support housing choice for voucher holders, Jacksonville Housing should partner 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: Many residents and stakeholders noted that restrictive qualification metrics for receiving housing assistance contribute to lack of fair housing choice, segregation, a lack of access to opportunity, and areas of concentrated poverty. A primary area of concern is overly restrictive income limitations. Due to HUD-established income limits, individuals and families receiving housing assistance often must choose between accepting higher-paying jobs and maintaining housing assistance. In many cases, a raise of under \$1 may disqualify a family from receiving assistance, even though it is not sufficient to make up for the lost housing subsidy. Income limits are established and updated at least annually by HUD, so Jacksonville Housing is limited in its ability to implement changes on a discretionary basis. However, there are several ways that Jacksonville Housing can address the housing needs of households earning above HUD's income limits for public and assisted housing. JH can use 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 workforce and mixed-income housing for households earning from 60% to 140% of the area median income, 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. Additionally, residents and stakeholders noted that the time allotted for residents who are disqualified from public housing due to increased incomes to find new non-subsidized housing is often too limited. While these time limits are established by HUD, Jacksonville Housing can develop an assistance program to assist disqualified individuals 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 community opposition to public and affordable housing development, 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. Educating residents of higher-opportunity neighborhoods on the benefits that public and affordable housing developments offer to all residents, even those not residing in them, is also an important step in building support for public and affordable housing, and thus to increasing the geographic diversity of publicly supported housing and reducing residential segregation. In addition, Jacksonville Housing can provide training to staff on reframing public input on public and affordable housing developments in ways that offer choice to current neighborhood residents, but not veto power (e.g., surveying residents on opinions elements such as design, amenities, and services in affordable housing development, instead of surveying them on whether they believe new developments should happen at all).

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.

Definitions

AFFIRMATIVELY FURTHER FAIR HOUSING

To Affirmatively Further Fair Housing Choice (AFFH) is to comply with “the 1968 Fair Housing Act’s obligation for state and local governments to improve and achieve more meaningful outcomes from fair housing policies, so that every American has the right to fair housing, regardless of their race, color, national origin, religion, sex, disability or familial status.”¹

AFFORDABLE

Though local definitions of the term may vary, the definition used throughout this analysis is congruent with HUD’s definition:

HUD defines as “affordable” housing that costs no more than 30% of a household’s total monthly gross income. For rental housing, the 30% amount would be inclusive of any tenant-paid utility costs. For homeowners, the 30% amount would include the mortgage payment, property taxes, homeowners’ insurance, and any homeowners’ association fees.

FAIR HOUSING CHOICE

In carrying out this Analysis of Impediments to Fair Housing Choice, Jacksonville Housing used the following definition of “Fair Housing Choice”:

The ability of persons of similar income levels to have available to them the same housing choices regardless of race, color, religion, sex, national origin, familial status, or handicap.

IMPEDIMENTS TO FAIR HOUSING CHOICE

As adapted from the HUD *Fair Housing Planning Guide*, impediments to fair housing choice are understood to include:²

Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices.

¹ U.S. Department of Housing and Urban Development. “HUD Publishes New Proposed Rule on Affirmatively Furthering Fair Housing Choice.” Press Release No. 13-110. July 19, 2013.

² U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, Page 2-17)*. March 1996.

Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

PROTECTED CLASSES

The following definition of federally protected classes is used in this document:

Title VIII of the Civil Rights Act of 1968 prohibits housing discrimination based on race, color, national origin or ancestry, sex, or religion. The 1988 Fair Housing Amendments Act added familial status and mental and physical handicap as protected classes.

Data Sources

DECENNIAL CENSUS DATA

Data collected by the Decennial Census for 2020, 2010, and 2000 is used in this Assessment (older Census data is only used in conjunction with more recent data in order to illustrate trends). The Decennial Census data is used by the U.S. Census Bureau to create several different datasets:

2010 AND 2000 CENSUS SUMMARY FILE 1 (SF 1)

This dataset contains what is known as “100% data,” meaning that it contains the data collected from every household that participated in the Census and is not based on a representative sample of the population. Though this dataset is very broad in terms of coverage of the total population, it is limited in the depth of the information collected. Basic characteristics such as age, sex, and race are collected, but not more detailed information such as disability status, occupation, and income. The statistics are available for a variety of geographic levels with most tables obtainable down to the census tract or block group level.

2000 CENSUS SUMMARY FILE 3 (SF 3)

Containing sample data from approximately one in every six U.S. households, this dataset is compiled from respondents who received the “long form” Census survey. This comprehensive and highly detailed dataset contains information on such topics as ancestry, level of education, occupation, commute time to work, and home value. The SF 3 dataset was discontinued for the 2010 Census, but many of the variables from SF 3 are included in the American Community Survey.

2010 AND 2020 REDISTRICTING DATA

The Census Bureau released redistricting data for all states on August 12, 2021. The dataset provides demographic characteristics of the nation by state, county, city, all the way down to the census block level, including race and ethnicity; population 18 years and over; occupied and vacant housing units; and people living in group quarters like nursing homes, prisons, military barracks, and college dorms.

AMERICAN COMMUNITY SURVEY (ACS)

The American Community Survey is an ongoing statistical survey that samples a small percentage of the U.S. population every year, thus providing communities with more current population and housing data throughout the 10 years between censuses. This approach trades the accuracy of the Decennial Census Data for the relative immediacy of continuously polled data from every year. ACS data is compiled from an annual sample of approximately three

million addresses rather than an actual count (like the Decennial Census's SF 1 data) and therefore is susceptible to sampling errors. This data is released in two different formats: single-year estimates and multi-year estimates.

ACS MULTI-YEAR ESTIMATES

More current than Census 2010 data, this dataset is one of the most frequently used. Because sampling error is reduced when estimates are collected over a longer period of time, five-year estimates will be more accurate (but less recent) than one-year estimates. The 2016-2020 ACS five-year estimates are used most often in this assessment.

HUD AFFIRMATIVELY FURTHERING FAIR HOUSING DATA AND MAPPING TOOL (AFFH-T)

HUD's AFFH Data and Mapping Tool provides a series of online, interactive maps and data tables to assist grantees in preparing fair housing analyses. Topics covered include demographics and demographic trends; racial and ethnic segregation; housing problems, affordability, and tenure; locations of subsidized housing and Housing Choice Voucher use; and access to educational, employment, and transportation opportunities. This report uses HUD's latest data and maps, AFFHT0004, which was released in November 2017. HUD's source data includes the American Community Survey (ACS), Decennial Census / Brown Longitudinal Tract Database (BLTD), Comprehensive Housing Affordability Strategy (CHAS), Longitudinal Employer-Household Dynamics (LEHD), HUD's Inventory Management System (IMS) / Public and Indian Housing (PIH) Information Center (PIC), and others. For a complete list of data sources, please see HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation appended to this report or available online at:

<https://www.hudexchange.info/resources/documents/AFFH-T-Data-Documentation-AFFHT0004-November-2017.pdf>.

III. COMMUNITY PARTICIPATION PROCESS

- A. 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 to include any meetings with the Resident Advisory Board, and other resident outreach.**

Community Engagement Overview

An important component of the research process for this Assessment of Fair Housing involved gathering input regarding fair and affordable housing conditions, needs, and opportunities in Jacksonville and Duval County. Jacksonville Housing’s project team used a variety of approaches to support meaningful engagement with residents and other stakeholders, including community workshops, stakeholder interviews, resident focus groups, and a community-wide survey.

COMMUNITY WORKSHOPS

In August 2022, Jacksonville Housing hosted a series of virtual and in-person community workshops to understand issues of fair housing and access to opportunity. Each workshop began with a brief presentation that provided an overview of the Assessment of Fair Housing, the community engagement process, the project website and survey, the project timeline, and the types of analysis to be included in the study. The presentation was followed by an interactive discussion of fair housing and access to opportunity. Two workshops were held virtually via Zoom—residents could join online or by phone—and two workshops were held in-person at the Brentwood Park auditorium, at 3465 Village Center Drive in Jacksonville. Residents could request language or other accommodations at the workshops if needed. A total of 33 participants joined a community workshop. Workshop dates and times are shown in Table 1:

TABLE 1: COMMUNITY WORKSHOP INFORMATION

Community Workshop 1	Virtual (via Zoom) Wednesday, August 3, 2022 6:00 p.m.
Community Workshop 2	Virtual (via Zoom) Thursday, August 4, 2022 11:00 a.m.
Community Workshop 3	In-person at the Brentwood Park auditorium, 3465 Village Center Drive, Jacksonville, FL 32206 Wednesday, August 10, 2022 6:00 p.m.
Community Workshop 4	In-person at the Brentwood Park auditorium, 3465 Village Center Drive, Jacksonville, FL 32206 Thursday, August 11, 2022 11:00 a.m.

STAKEHOLDER FOCUS GROUPS AND INTERVIEWS

The planning team also engaged with stakeholders representing a variety of perspectives through in-depth individual interviews. Discussion topics included housing needs, barriers to fair housing, housing discrimination, access to opportunity, and fair housing resources. 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.

Virtual focus groups were held with members of Jacksonville Housing’s Resident Advisory Board (RAB) and participants in its Family Self Sufficiency (FSS) program. Like the community workshops, each focus group began with a brief presentation that provided an overview of the Assessment of Fair Housing, the community engagement process, the project website and survey, the project timeline, and the types of analysis to be included in the study. The presentation was followed by an interactive discussion of fair housing and access to opportunity

in Jacksonville and Duval County. Focus groups were held virtually via Zoom, and residents could join online or by phone. Eight residents participated in a focus group.

COMMUNITY SURVEY

A final method for obtaining community input was a 24-question survey available to the public, including people living and/or working in Jacksonville and Duval County, and other stakeholders. The survey was available from June through August 2022 via an online link. Hard copies were available by request to Jacksonville Housing. A total of 38 survey responses were received.

PUBLICITY FOR COMMUNITY ENGAGEMENT ACTIVITIES

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.

FIGURE 1: PROMOTIONAL MATERIALS FOR COMMUNITY WORKSHOPS AND PROJECT WEBSITE

The image displays two versions of a promotional flyer for the Jacksonville Housing Assessment of Fair Housing. The top half of the flyer features a photograph of a row of colorful, modern townhouses with blue, yellow, and white siding. The Jacksonville Housing logo, which includes a stylized city skyline and palm trees, is in the top left corner. The title "JACKSONVILLE HOUSING ASSESSMENT OF FAIR HOUSING" is centered in large, bold, blue letters. Below the title, a paragraph of text asks: "What types of housing needs are greatest in Jacksonville? Do residents of all neighborhoods have equal access to community resources, including proficient schools, employment, transportation, low-poverty neighborhoods, and a healthy environment? What are the greatest barriers to fair housing in Jacksonville?"

The bottom half of the flyer is divided into two columns. The left column is titled "GET INVOLVED!" and "Attend a meeting and share your thoughts." It lists two workshop options: "Virtual Workshops" on Wednesday, August 3rd, at 6pm and Thursday, August 4th, at 11am, and "In-Person Workshops" on Wednesday, August 10th, at 6pm and Thursday, August 11th, at 11am. It provides the location as Brentwood Park Auditorium, 3465 Village Center Drive, Jacksonville, FL 32206, and a link to register: <https://jacksonvillehousingafh.org/get-involved>. The right column also has a "GET INVOLVED!" header and encourages visiting the project website, jacksonvillehousingafh.org, to take the fair housing survey, find out about and register for virtual and in-person community workshops, and share their insight on fair housing in Jacksonville. A large orange button with the text "VISIT jacksonvillehousingafh.org" is prominently displayed.

At the bottom of the flyer, a small disclaimer states: "Anyone requiring accommodations to participate in a workshop should contact Jessica Fisch at jessica_fisch@mosaiccommunityplanning.com at least 48 hours prior to the meeting. Jacksonville Housing is currently developing its Assessment of Fair Housing (AFH), which will look at whether everyone has similar choices for housing regardless of their race, ethnicity, national origin, sex (including sexual orientation and gender identity), religion, disability, or whether they have children. The assessment will also outline a plan to address any fair housing issues in the city. The community's opinions and perceptions are an important part of this planning process, and everyone is invited to participate."

The project website provided an overview of the Assessment of Fair Housing, as well as information about community workshops, a link to the fair housing survey, maps detailing residential segregation and access to opportunity, and related resources. The website received more than 600 visits from July through September 2022.

Public notice of community input opportunities was given to residents through announcements on Jacksonville Housing's website and newsletters, and through emails to Jacksonville Housing residents and community stakeholders. Stakeholder interview invitations were sent to more than 60 contacts representing a variety of viewpoints, including elected officials and staff, housing authority staff, housing developers, nonprofit organizations, homeless housing and service providers, mental health service providers, organizations serving people with disabilities, family and senior services organizations, workforce development organizations, and others. Meeting advertisements noted that language and other accommodations were available at community workshops if needed; no requests for accommodations were received.

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

One or more representatives from about 10 organizations and agencies participated in a stakeholder interview, community workshop or focus group, or responded to data requests for the Assessment of Fair Housing. Organizations and agencies that participated in the development of this AFH include Beyond90, Groundwork Jacksonville, Jacksonville Area Legal Aid, Jacksonville City Council, Jacksonville Housing, Jacksonville Housing Family Self-Sufficiency Program, Jacksonville Housing Resident Advisory Board, Jacksonville Human Rights Commission, LIFT JAX, and LISC Jacksonville.

C. Describe whether the outreach activities elicited broad community participation during the development of the AFH. If there was low participation, or low participation among particular protected class groups, what additional steps might improve or increase community participation in the future, including overall participation or among specific protected class groups?

The Assessment of Fair Housing elicited broad community participation through virtual and in-person community workshops, focus groups, stakeholder interviews, the community survey, and the project's website.

- D. Summarize all comments obtained in the community participation process, including any recommendations provided by the Resident Advisory Board(s). Include an explanation for why any oral or written comments submitted through the community participation process were not incorporated or accepted into the AFH.**

Stakeholder Interview, Community Workshop, and Focus Group Results

- 1. What types of housing needs are greatest in the community (e.g. workforce housing, affordable rental housing, housing for people who are homeless, assistance for first-time homebuyers, rehab/repair programs for homeowners, housing for seniors or people with disabilities, etc.)? How important a need is affordable multifamily rental housing?**

Affordable housing supply and funding

- Rents are high because of lack of housing supply.
- There is a need for more decent, safe, affordable housing.
- There is a need for affordable multifamily rental options. Most rentals are single-family units.
- There is a shortage of more than 6,000 housing units in Jacksonville.
- Lack of housing supply is due to more people are moving to the area and older housing deteriorating, while not enough new housing is being developed.
- Much of the new construction of both homes and apartment complexes is geared toward higher-income individuals, as opposed to affordable housing. There is a lot of new housing, but not much of it is assisting people with the greatest need.
- Investors who buy housing are driving up prices.
- Community Development Corporations (CDCs) and Community Housing Development Organizations (CHDOs) need more public and private funding because they have a large impact on affordability.
- The City of Jacksonville should buy and develop land.

Need to address high levels of cost burden

- There is a need for income-based housing and vouchers
- There is a need for housing affordable to residents who don't qualify for vouchers but can't afford market rent. If people earn slightly more than the limit, they don't qualify for assistance.
- Rents have increased rapidly; many people pay \$1,800-\$1,900 per month
- Affording housing on a fixed income is challenging for seniors. Rents are increasing while incomes remain fixed.

Senior housing

- Issues with senior housing rejecting refugees
- Empty nesters may be considering downsizing to save money on housing
- Seniors living in public housing may like their community but not want to live next to a young family with teenagers. There is a need for more senior communities.
- There is a need to increase affordability of senior housing.

Housing accessible for people with disabilities

- Many people using Housing Choice Vouchers need first-floor units or accessibility features
- Accessibility requirements for low-income housing should be the same as for all housing

Housing for veterans

Support for homeownership

- Many people are renting homes who would previously have been homeowners.
- There is a need to increase the supply of housing that is affordable to middle-class residents. Increases in housing costs in the city places homeownership out of reach for many residents.
- There is a need for down payment assistance.
- Getting approved for a loan to purchase a home is difficult for many residents.
- There is a need for homeownership assistance for people on Section 8.
- There is a need for financial counseling.

Specific types and sizes of housing

- One-bedroom units
- Housing for large and intergenerational families

Rehabilitation and maintenance of housing

- There is a need for home rehab and repair programs, including assistance with home rehab and repairs, electrical, plumbing, and tree overhang.
- Much of the county's multifamily housing is in deterioration and undesirable to live in. Landlords are exploitative and do not live in the neighborhood. There is a need to work with code enforcement and the city.
- The county's single-family homes are historic. Some are well-maintained, but some have fallen into disarray because of inability to pay for repairs, particularly for seniors.
- There is a lot of deferred maintenance and basic safety and health issues in housing resulting from storm damage. Many people aren't eligible for hurricane recovery repairs. People may not have the income to fix up their homes, get new roofs, or make repairs.

Quality and safety of public and assisted housing

- Residents in some public housing units have had issues with rodents because inspections weren't being done in a timely manner. A new management company was brought in, and the issues were resolved within 90 days.
- Management companies are not being held accountable for maintaining housing. If code enforcement is involved and a report and follow up is made, there should be communication to HUD or the Housing Authority that the complex is a problem. If the challenges or reports are not corrected, funding should be stopped.
- Landlords renting housing through the Section 8 program must comply with housing quality standards. Repairs done should not be the bare minimum.
- Code compliance is an issue in some public housing properties. One location has only one exit.
- Insulation in some public housing properties is half of what it should be. Poor insulation exacerbates noise issues.

Addressing vacancy and uneven investment

- There are vacant structures in some areas that could be developed into housing.
- Developers tend to focus on some areas of the county and not others
- There are clusters of public and assisted housing because of the locations of public housing and where people are able to/choose to use their vouchers, but rehabilitation efforts aren't evenly distributed across the county.
- There is a need for infill development. However, acquiring the lots from private owners is often challenging for organizations.

Addressing opposition to affordable housing

- There is a lot of neighborhood opposition to affordable housing development, making Jacksonville one of the most difficult markets in Florida to build affordable multifamily housing. City zoning and development policies allow neighborhood residents to stop affordable housing development.
- There is a need to plan with neighborhood residents on how they want to do neighborhood revitalization and develop new housing that fits with the neighborhood character. Smaller multifamily units, such as duplexes and quadruplexes, would be options for adding more affordable housing in single-family neighborhoods and historic districts.

Housing counseling

- There are not enough spots available in counseling programs.

Landlords who accept vouchers

- Many residents have had difficulty finding landlords who accept vouchers, which limits their housing choices.

Code enforcement

- The City's code enforcement and inspection process is very lax. Many tenants are living in conditions in which if they complain about housing conditions, the landlord doesn't care, and if they complain too much they may get evicted. It's very easy to evict people if they miss a payment.

Safety concerns

- Affordable housing locations have safety concerns
- Some neighborhoods that would provide good opportunities for purchasing a home have high levels of crime.
- There are safety concerns at public housing properties.

Public housing

- Waiting lists for public housing are long

Increasing acceptance of Housing Choice Vouchers

- Jacksonville Housing is doing well at improving the quantity and quality of its housing, but the need is overwhelming. If there could be more money put into getting landlords to take subsidies, that would be more efficient.
- Jacksonville Housing could try to work with investors who are buying up properties to encourage them to accept vouchers.

Insufficient voucher payment standards

- For residents working low-wage jobs, housing costs are often too high even with vouchers.
- Vouchers are based on income and household composition, so unless residents have jobs that pay a certain amount, a voucher only allows them to live in certain areas of the county.
- If you make too much money and no longer qualify for assistance under the voucher program, you have six months to find new housing, which is not enough time.

Stable rental housing

- There is high volatility in the rental market, and residents are receiving non-renewal notices.

Lack of opportunity in areas with affordable housing

- There are not enough constructive things to do in Brentwood. The community has housing but is lacking resources.

Need for investment in public infrastructure and neighborhood cleanups/ maintenance

- There are not resources to address issues such as property maintenance, flooding, and trees growing into telephone wires.

Affordable legal services and addressing issues of fragmented title

- Residents with heirs' property and fragmented title are at risk of losing their properties, resulting in turnover to investors.
- There is a need for affordable, accessible legal services to address issues of fragmented title.

Addressing homelessness needs

- There is a need for emergency housing assistance

Addressing impacts of COVID-19 pandemic

- Residents lost income during the pandemic, which affected ability to pay for housing.
- Emergency rental assistance has been a helpful program, but some landlords may deny receiving payments.

Improved communication with Section 8 counselors

- There is a need for improved communication and transparency regarding rules, requirements, and explanations of changes in benefits.

Education and transparency about public housing requirements

- Many residents do not understand requirements for cleaning units.

2. **What parts of the county are generally seen as areas of opportunity (i.e. places people aspire to live, places that offer good access to schools, jobs, and other amenities)? What makes them attractive places to live? Are there barriers someone might face in moving to one of these areas? What barriers might residents using Housing Choice Vouchers or public housing residents face?**

Residents and stakeholders noted several areas of opportunity in the county and region, including:

- Riverside
- Beaches
- San Marco

- Mandarin and areas close to the river
- Certain parts of the westside
- Bartram Park
- Northside by Jacksonville Airport
- The southwest area of Jacksonville
- Outer ring suburbs
- Avondale
- Murray Hill
- North Riverside
- San Jose
- The Riverside, Beaches, and San Marco areas have good schools, walkability, and recreation opportunities.
- The southside has good schools, housing, nice picnic areas and play areas, safety and security. Housing on the northside is not taken care of as well, and the environment is not clean.
- The northside offers more space, and amenities are within driving distance.
- The Kernan and Atlantic Beach areas of Jacksonville are areas of opportunity but do not have good access to public transportation.
- If you cross the bridge (to the southside), there is nicer housing, and the community has been upgraded over the years. There are places to shop, employment opportunities, and less crime. In districts 7, 8, 9, and 10, there hasn't been investment. There are fewer grocery stores. On these areas, there are fewer job opportunities and quality of life is lower. Some areas are not as well maintained as others.
- St. Johns County has better opportunities than Duval County. The county is growing, and schools and accessibility seem to be better there. Both people in Jacksonville and new people moving to the area want to live there.
- There is not a lot of housing in the 32218 area. That area is near stores and in walking distance to resources and services, but there is not any open housing there. The 32277 zip code is similar.
- Surveys of residents show that most people are proud of their neighborhoods and like living in their neighborhoods. A lot of people are not necessarily interested in moving out. They want more amenities in their neighborhoods.

Residents and stakeholders noted several barriers to moving to areas of opportunity, including:

Housing costs and location of affordable housing

- Arlington and south Duval County are too expensive for most residents.

- There is a need for more affordable housing.
- On the southside, a 900 square foot unit would cost \$1,400 to \$1,500. On the northside, you would get 1,400 to 1,500 square feet for \$1,400. If people need a larger unit to avoid overcrowding, they couldn't afford the southside.
- Neighborhoods that have access to better quality amenities have higher cost of living. There is a need to bring in amenities to low-opportunity areas.
- Because of the housing crisis, residents cannot afford to pay for housing across the bridge (on the southside) for what might be a better standard of living.
- Most affordable housing is in older areas and the urban core neighborhoods.

Location of public and assisted housing

- There isn't a lot of subsidized housing in these desirable neighborhoods. The Housing Authority could do a lot better at getting approval for developments in mixed income neighborhoods.

City policies and opposition to affordable housing

- Jacksonville Housing and developers working on subsidized housing have difficulty getting zoning approval for housing in some locations because of neighborhood opposition to affordable housing. This results in a lack of public and assisted housing in those areas. For example, Ability Housing and Vestcor got sued for trying to build assisted housing in Springfield.
- Jacksonville is one of the most difficult markets in Florida to build multifamily affordable housing. Developers have to get plan approval, a zoning change, and land development approval, and that's where residents are able to oppose affordable housing development.

Income and jobs

- Rents are increasing more than voucher amounts, and residents, particularly those on fixed incomes, can't afford the rent increases.
- The job market in many of the areas of opportunity isn't good, which doesn't fit with the high cost of housing.

Transportation

- There isn't a lot of public transportation in the areas of opportunity.
- The bus system is inadequate because of the county's large size. If someone wants to live on the westside and work in the beaches area, that would be an issue.

- A lot of residents don't have a lot of money and need to stay close to areas where they have transportation. Transportation is a huge issue.
- Transportation is a particular problem for residents who live in food deserts, including New Town, North Riverside, Durkeeville, Historic Eastside, and Springfield.

Voucher amounts

- Voucher amounts haven't kept up with the market.
- Voucher amounts are lower when someone's income is lower. People with jobs are able to maximize their vouchers, but people with lower incomes have lower voucher amounts.
- Many of the people who are housed with vouchers came into the program earlier, and it isn't working the same now.
- In zip codes 32209 and 32208, there isn't any housing that fits the voucher amounts.

Small Area Fair Market Rents

- When HUD moved to SAFMR, it took funding away from the zip codes with a higher concentration of families of areas of poverty, such as zip codes 32208, 32209. Funding was redirected to other areas, such as 32206, southside, further down the westside, farther north, and the River City area to reduce concentrations of poverty. But people don't want to live over there because it's not where their support systems and families are. Families are not getting the same square footage over there. If their income doesn't support the higher priced area, then whether or not the voucher allows them to live there is a moot point. If they don't have a substantial income for their household, they will end up in the more poverty-stricken areas.

Limited acceptance of vouchers by landlords

- Some landlords don't want Section 8 in their area. There is bias against residents using Section 8 vouchers.
- Voucher holders are unable to access desirable areas. 30% of eligible properties account for 75% of voucher use.

Maintenance of rental housing

- Some landlords do not maintain their properties.

Quality of public housing

- Public housing looks good at first glance and passes inspection, but upon moving in there are bunch of problems.

Social networks and community

- Many residents want to stay in the same area as their family.
- Many people don't have a support system further out and would rather be closer to people they know.
- People typically want to live, work, and go to church in the same area.

Race, ethnicity, and identity

- Some neighborhoods have very few people of color or immigrants, and residents of color and immigrants may not feel comfortable moving to those areas.

Support Services

- Certain areas don't have as many support services. In some areas, residents may have to pay \$200 for childcare each week. It may be a 30-minute drive to get free or low-cost childcare.

Crime and safety

- Apartments in some areas have high crime rates.

Steering by real estate brokers

- Real estate brokers may guide people to specific neighborhoods or steer them away from others.

- 3. Do residents of all neighborhoods in the county have equal access to resources, including proficient schools, employment, transportation, low-poverty neighborhoods, and a healthy environment (including clean air and parks)? Do public housing residents and people using Housing Choice Vouchers have equal access to resources, including proficient schools, employment, transportation, low-poverty neighborhoods, and a healthy environment (including clean air and parks)?**

Residents and stakeholders noted several disparities in access to opportunity across neighborhoods, including:

Schools

- Low-income residents are unable to access neighborhoods with good schools.
- Most residents are not able to take their children to schools in different areas and have to send them to the schools available in their neighborhoods.

- There is more equity in schools because of the magnet school program. Children on the eastside could go to better schools, such as Stanton College Preparatory School or James Weldon Johnson Middle School, because of the magnet program.
- Parents must apply for children to receive transportation to magnet schools. Parents can drop them off at the neighborhood school to receive transportation to magnet schools, but parents have to be aware of the program and apply.
- The Jacksonville Transportation Authority has been offering vouchers to students who don't have adequate transportation.
- Private schools typically don't provide transportation.
- The schools in District 8 are being upgraded, but they have been left behind for a long time.
- The better the school district, the harder it is to get public housing in that area.
- We had a referendum for a 1/2 cent sales tax to renovate schools in the north and northwest. That's an indication that there is a significant deferred maintenance on school facilities that will start to be addressed. That was perceived to be such a huge issue that it was added as a referendum.

Affordable housing

- Waitlists are long. The wait for vouchers is three to five years.
- Income ratios are restrictive.
- It is difficult to transfer to different public housing locations. People have to live with the resources available in their area.
- With the voucher program, there are limits on how much households can pay for rent, and on how many people can be in a unit. Residents using vouchers don't have the option to spend exorbitant amounts of income on housing.

Infrastructure

- Data shows that assisted families are limited to low-infrastructure neighborhoods. Residents have access to what's nearby, but what's nearby might not be great.

Jobs and transportation

- Employment and transportation go hand in hand. If there are no employment options where people live, they face the problem of getting transportation to jobs. It limits a person when they have to take three different buses to get to employment.
- Some jobs, such as those at the Amazon warehouse, are not in accessible locations.
- Some places in Jacksonville that have jobs aren't accessible without a car.
- The county is car-centric and has a large land area.

- Many residents rely on the bus, which can be a hindrance.
- Getting to jobs outside of the neighborhood is very difficult with the bus system.
- For many low-income neighborhoods, there are no jobs close by.
- Although some low-income neighborhoods are close to downtown, our downtown isn't built out as much. There are not a lot of people living downtown and not as many jobs. Residents are more likely to get to jobs on the other side of the metro or by the airport.

Community services

- There should be a proactive focus on providing funding for communities where low-income housing is located. There should be communication between local, state, and federal government to leverage dollars to impact communities, not just for housing but for essential services that are needed for a community. Public housing locations should be part of a larger plan in the community.
- Services should be provided across all public housing sites. Right now, most events and resources are focused around Brentwood.

Environment and Health

- There are two neighborhoods in the city that are only seven miles apart, and the average life expectancy differs greatly between them – 80 years vs. 67 years.
- We have a lot of parks in Jacksonville, but the quality is not always there. Just because there is a park doesn't mean it's used or in good condition.
- There are differences in quality of parks in high- and low-income neighborhoods. Most parks near Brentwood are not well maintained. In New Town there is a park, but the equipment is in disrepair. There currently is nowhere to exercise in North Riverside.
- There are safety concerns in some parks, and young children may not feel comfortable going to them.
- Parks may not be located within walking distance. Residents may require a vehicle to feel safe accessing some parks.
- Some parks do not have shade.
- It is important to pay attention to issues of resiliency, such as flooding, climate resilience, which neighborhoods are vulnerable to natural disaster, and concerns about flooding potential.
- The heat island effect is a concern. Some low-income neighborhoods are hotter than other parts of the city, which has a disproportionate health impact.
- Almost all of the urban core is an EPA-designated brownfield, so it's polluted.

- In the Moncrief area, some apartments have been improved, but some of them are older and not near parks. The air quality may be lacking, with mold in some cases. There is a lack of places to walk, play, and exercise.

Food access and retail

- Many of our low-income neighborhoods are food deserts.
- Much of the grocery stores and shopping in the urban core has moved to the suburbs.

Safe Neighborhoods

- Crime rates are higher in affordable areas.
- Public and assisted housing tends to be located in high poverty neighborhoods. Some of these areas have increased levels of crime.

Residents and stakeholders also noted some geographic areas of the county that lack access to opportunity across multiple factors:

- Areas lacking parks, transportation, and infrastructure include Durkeeville, Newtown, Grand Park, East Side, Brentwood, 45th and Moncrief, 29th and Chase, Health Zone 1, northwest Jacksonville, and the urban core neighborhoods except Springfield, Brooklyn, and Riverside.
- The northwest corridor lacks recreation, job access, community programs, financial investment, infrastructure, transit, and food access.

4. Do residents of similar incomes generally have the same range of housing options? Are there any barriers other than income/savings that might impact housing choices? Are you aware of any housing discrimination?

Residents and stakeholders noted several barriers to housing choice other than income or savings, including:

- Past redlining of neighborhoods limits housing options by race and ethnicity.
- Source of income discrimination is a barrier for voucher holders, who are often not accepted as tenants because of their participation in the voucher program.
- Houses are under-appraised in neighborhoods with higher proportions of people of color.
- There is a lack of investment in infrastructure in neighborhoods of color. Many flood-prone neighborhoods have not received infrastructure help that was promised.

- Real estate brokers guide people toward specific neighborhoods and steer people out of other neighborhoods. In the majority white neighborhoods, the real estate brokers often don't want people of color or immigrants.
- Discrimination by landlords. Landlords usually do not openly discriminate based on protected classes, but rather provide alternative reasons for turning down applicants. Discrimination is less of an issue with public housing because it is income-based.
- Discrimination based on race.
- Discrimination based on family status. Many landlords do not want to rent to families with several children, even if the units have a sufficient number of bedrooms. Some housing has had signs saying children are not allowed.
- Lack of new housing development in some areas of the county.
- Lack of availability of public housing.
- Voucher rates not keeping up with market rates.
- Poor condition of some housing units in the Section 8 program.
- Transportation.
- Credit scores and security deposits. Some residents are required to pay a higher deposit if they don't have a good credit score.
- Criminal records. Residents with felony records must wait five years before applying to programs.
- Safety concerns and media portrayal of some neighborhoods as high-crime areas.
- Difficulty in transferring among public and assisted housing programs and locations.
- Need to be close to family and other support systems, such as churches and community centers.
- Jacksonville Housing gives preference to people with disabilities, veterans, and seniors when determining assistance.
- Lack of knowledge of available programs and scholarships available through Jacksonville Housing.
- Social and cultural discrimination and feeling safe in neighborhoods where there are more people of the same race.

5. Are people in the area segregated in where they live? What causes this segregation to occur?

Residents and stakeholders indicated that segregation exists in Duval County, emphasizing the following concerns:

- Segregation has improved but still exists.

- There are more African Americans than other races on the north side of town.
- There is segregation by income. Many people live in as nice of a place as they can afford.
- There is racial segregation among public housing properties. The locations residents are offered is based on availability and number of bedrooms needed.
- Segregation exists more between neighborhoods than within neighborhoods.

Residents and stakeholders also emphasized the diversity of residents in the city and county, noting that:

- Fair housing enforcement and education has helped diversify segregated areas.
- The schools are diverse.

Residents and stakeholders noted the following causes of segregation in the city and county:

- Neighborhood boundaries influence appraisal values and thus potential buyers. Zip codes 32209, 32208, 32206, and 32254 are majority black and have the lowest value homes, highest vacancy rates, and the least infrastructure. Segregation can be addressed by down payment assistance, access to legal services, financial counseling, educating, monitoring landlord and property management behavior, and more attention to housing conditions.
- Segregation is caused by legislation and a lack of investment and small business development.
- Section 8 voucher landlords are very much segregated in majority Black neighborhoods. There is discrimination in other neighborhoods so that for people who might want to live somewhere else, the landlords aren't accepting Section 8. It's worse in Jacksonville than in many places.
- Real estate brokers guide people toward specific neighborhoods and steer people out of other neighborhoods. In majority white neighborhoods, the real estate brokers often don't want people of color or immigrants.
- Property management is much worse in low-income neighborhoods. Smaller landlords may not have resources, and often do not maintain low-rent properties. There is a lack of inspection and accountability and a need for transparency.
- The urban core needs more funding, and there should be reallocation of funds.
- Refugees often seek out communities with others from the same area, but their housing choices are limited by affordability.
- Housing costs limit where residents are able to live.
- Residents may choose to live in the area where they grew up to have a support system. The county tends to be segregated in that way.
- Much of the public housing is located in the downtown area.

- Investors have been purchasing low-income properties in some areas, and people can't afford to move to those areas.
- Zip codes that are racially and ethnically concentrated areas of poverty were the hardest hit zip codes with Small Area Fair Market Rents (SAFMR). Jacksonville Housing was mandated in April of 2018 to support residents in moving to areas of higher opportunity. That opened up 47 zip codes, but in the racially and ethnically concentrated areas of poverty the voucher amounts didn't go up. Landlords getting new tenants in those areas would get lower rents because they were bound by SAFMR.
- There are disparities in access to legal services, basic assistance, and housing counseling. A lack of affordable legal services affects family wealth. For heirs' properties and fragmented title, residents need lawyers. It's surprising how little real estate transaction services are available in some neighborhoods.
- Gentrification may add to segregation by displacing Black residents. In the short-term, it may reduce segregation as white residents move into historically Black neighborhoods. More white residents have moved to New Town and North Riverside.

6. What types of fair housing services (education, complaint investigation, testing, etc.) are offered in the area? How well are they coordinated with the work of other organizations in the community?

Residents and stakeholders noted a variety of fair housing services in the area, including:

- Jacksonville Housing hosts a fair housing symposium, financial literacy workshops, a homeownership fair, transportation, and food assistance. Resident Services puts out information about available resources and a calendar of events. Some educational programs are not available at all Housing Authority properties, so residents require transportation to access them.
- Jacksonville Area Legal Aid provides help with landlord-tenant issues, some other housing issues, and information about fair housing and what to do in instances of discrimination. When landlords do not meet requirements, the organization works to ensure households are able to remain in Housing Authority programs. Legal assistance is an overwhelming need with a lack of resources.
- The Jacksonville Human Rights Commission addresses issues of housing and employment discrimination.
- The local HUD field office has a fair housing department.
- The City of Jacksonville has programs to improve housing conditions, but they need to be expanded to keep up with the need. Jacksonville Housing partners with the City of Jacksonville on many programs.

- If voucher participants' property manager is unresponsive, they can reach out to their housing counselor. The Housing Authority documents issues in writing and forwards them to the inspections department. The Housing Authority lets clients know that they can use Jacksonville Area Legal Aid and the City of Jacksonville Neighborhoods Department code compliance to hold property managers accountable. There are things the Housing Authority isn't able to hold the property accountable for, so residents need to call code enforcement.
- United Way 2-1-1 provides connections to resources and services. The 2-1-1 system has helped improve communication and coordination among organizations and agencies.
- Fair housing classes and community meetings have declined during the COVID-19 pandemic.
- Many public housing properties used to have after school assistance, computer classes, social services, and homeownership education. A lot of those services were accessible as a one-stop shop so that people who wanted to move to homeownership could do that. Those resources are more limited now.
- There is a need to increase residents' awareness of available resources and services.
- There is a need for improved communication between programs and organizations.
- There is a need for data about services and results to be tracked and shared. The City and nonprofits should collaborate on collecting data on health and other outcomes. There is a need for incentives for organizations to improve performance and engagement.

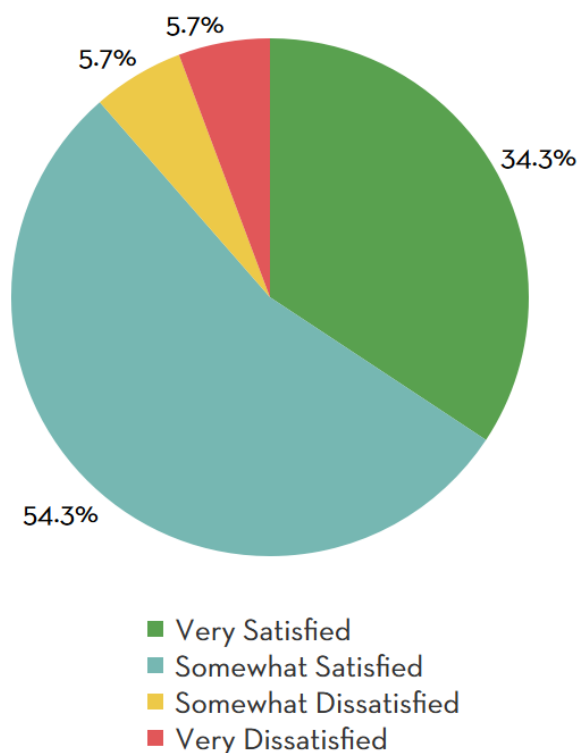
Community Survey Results

The community survey asked residents and stakeholders about barriers to fair housing, affordable housing needs, and access to opportunity in the city and county. A total of 38 people responded to the survey, representing a range of age groups, income levels, races and ethnicities, and zip codes. Full survey results are included in the community engagement appendix.

RESPONDENTS' THOUGHTS ABOUT THEIR NEIGHBORHOODS

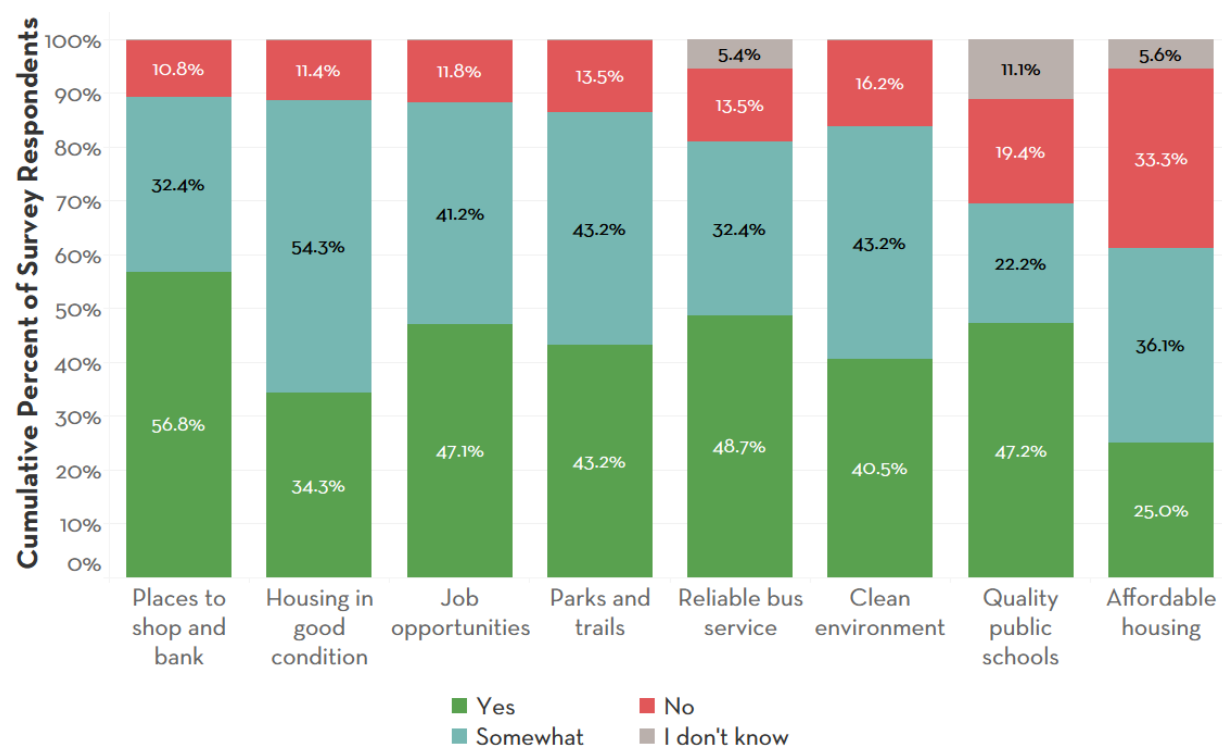
When asked about satisfaction with their neighborhoods, almost 9 in 10 respondents (88.6%) said they are somewhat satisfied (54.3%) or very satisfied with their neighborhoods (34.3%). Slightly more than one in ten residents (11.4%) said they are somewhat dissatisfied (5.7%) or very dissatisfied (5.7%; see Figure 2).

FIGURE 2: RESPONSES TO “HOW SATISFIED ARE YOU WITH THE NEIGHBORHOOD WHERE YOU LIVE?”



When asked about access to community resources in their neighborhoods, respondents most often said they have access to places to shop and bank (89.2% said they have access or somewhat have access). Respondents most often indicated a lack of access to affordable housing (33.3% said they lack access in their neighborhoods), quality public schools (19.4% said they lack access), and a clean environment (16.2% said they lack access; see Figure 3).

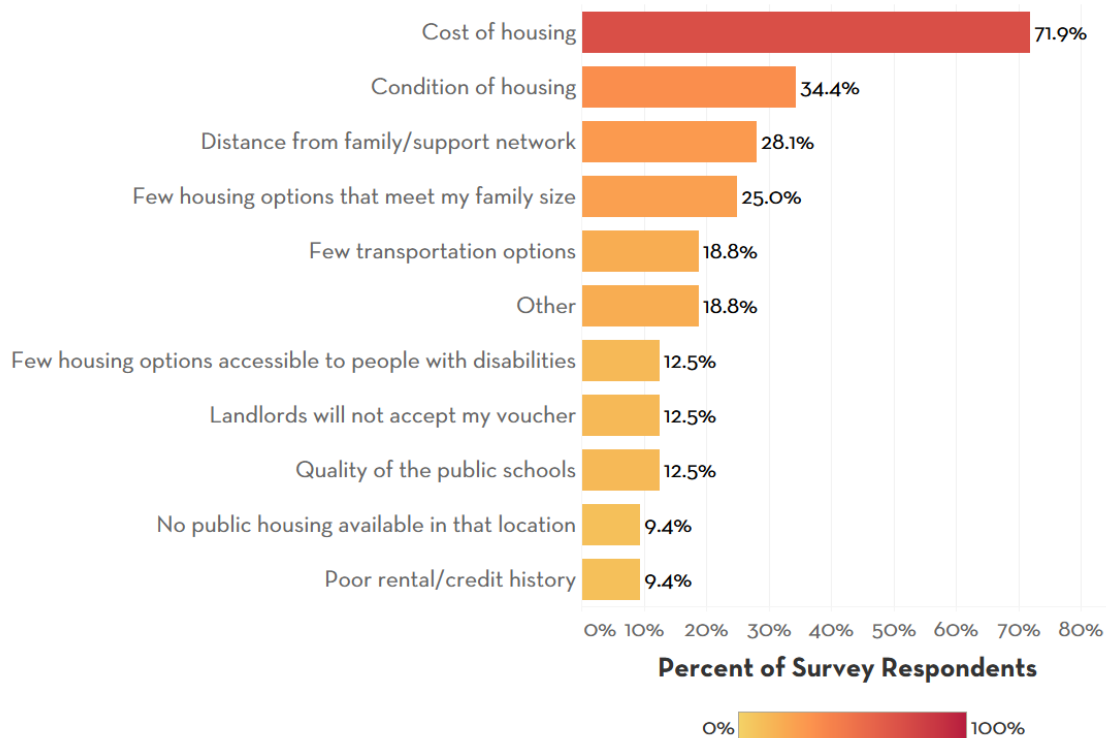
FIGURE 3: RESPONSES TO “DO YOU HAVE ACCESS TO THE FOLLOWING COMMUNITY RESOURCES IN YOUR NEIGHBORHOOD?”



RESPONDENTS' THOUGHTS ABOUT BARRIERS TO MOVING

When asked about barriers to moving closer to their workplace or another area of the city, respondents most often noted cost of housing (71.9% of respondents), condition of housing (34.4%), and distance from family/ support network (28.1%).

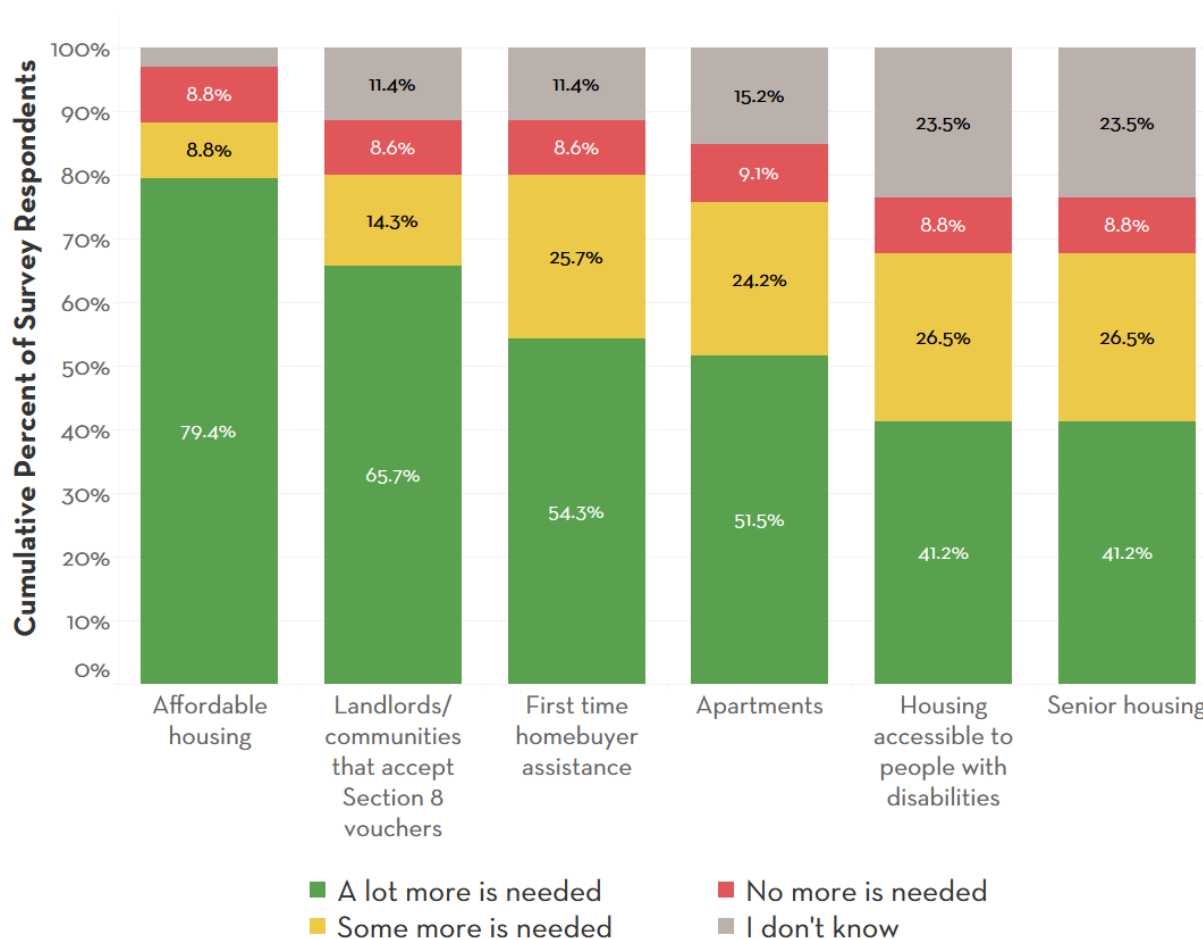
FIGURE 4: RESPONSES TO “IF YOU WISH TO LIVE CLOSER TO YOUR WORKPLACE/MOVE TO ANOTHER AREA OF JACKSONVILLE, ARE ANY OF THE FOLLOWING BARRIERS PREVENTING YOU FROM DOING SO? (CHECK ALL THAT APPLY.)”



RESPONDENTS' THOUGHTS ABOUT HOUSING NEEDS

When asked about housing needs in Jacksonville and Duval County, survey respondents noted the highest levels of need for affordable housing (79.4% said a lot more is needed) and landlords/ communities that accept Section 8 vouchers (65.7% said a lot more is needed). More than 50% of respondents also noted a high level of need for first-time homebuyer assistance and apartments (see Figure 5).

FIGURE 5: RESPONSES TO “FOR EACH OF THE HOUSING OPTIONS LISTED BELOW, PLEASE INDICATE WHETHER YOU THINK MORE UNITS ARE NEEDED.”



RESPONDENTS' THOUGHTS ABOUT ACCESS TO COMMUNITY RESOURCES

When asked about the distribution of community resources, more than 50% of survey participants said that grocery stores and other shopping, schools, property maintenance, and banking and lending are not equally available throughout all areas. Of all community resources and services, garbage collection was most often noted as equally provided across communities in Jacksonville (see Figure 6).

FIGURE 6: RESPONSES TO “PLEASE CHECK WHETHER YOU THINK EACH OF THE FOLLOWING ARE EQUALLY PROVIDED ACROSS ALL COMMUNITIES IN JACKSONVILLE.”



RESPONDENTS' THOUGHTS ABOUT FAIR HOUSING

Most survey participants reported understanding or somewhat understanding their fair housing rights (45.7% and 37.1%, respectively). While only 17.1% of respondents said that they did not know their fair housing rights, 35.3% said they would not know where to file a housing discrimination complaint.

Eleven survey participants (28.9%) experienced housing discrimination while living in Jacksonville. Of those 11 people:

- Eight respondents noted that they were discriminated against by a landlord or property manager. Three residents were discriminated against by real estate agents, three by mortgage lenders, and two by a City staff person.
- Race/color was the most common basis for discrimination, cited by nine people, followed by familial status, noted by four people.
- None of the eleven people filed a report of discrimination. Reasons for not filing discrimination complaints included not knowing what good it would do (identified by five people), not knowing where to file (identified by five people), fear of retaliation (identified by five people), not realizing discrimination was against the law (identified by two people), not having time to file (identified by two people), the process not being accessible because of a disability (identified by one person), and other reasons (identified by two people).

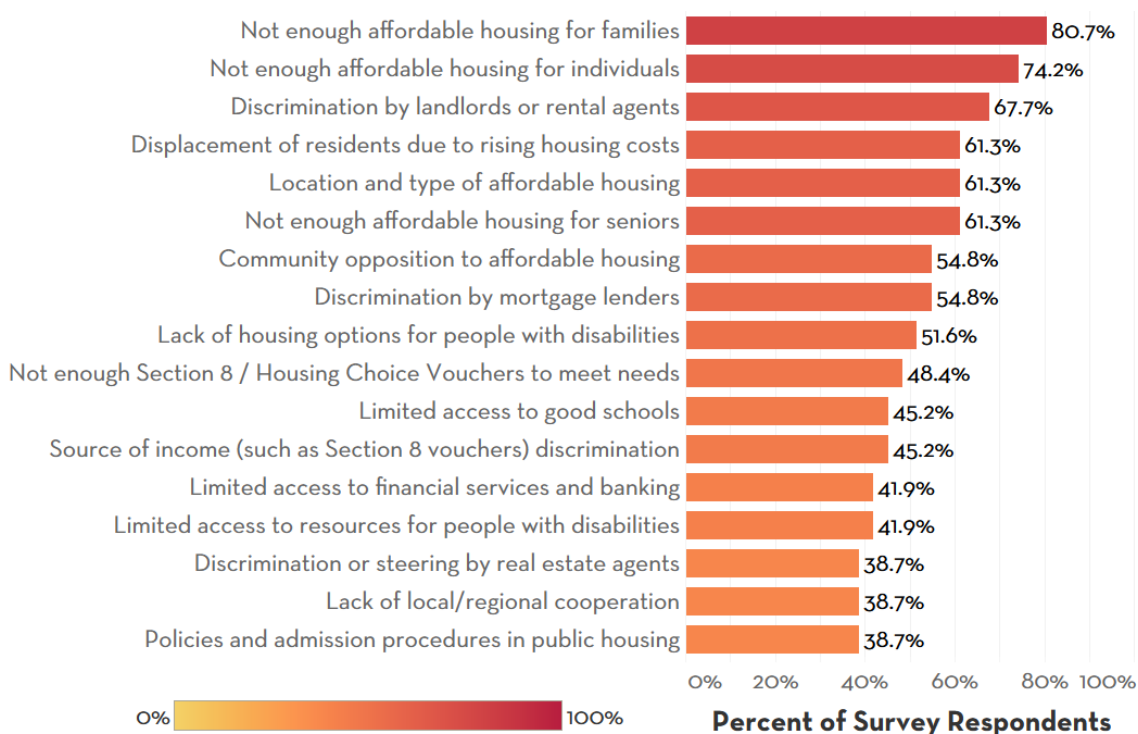
More than two thirds of respondents (71.4%) said they believe housing discrimination is an issue or may be an issue in Jacksonville, while just 5.7% said they do not believe housing discrimination is an issue.

Asked to select any factors that are barriers to fair housing in Jacksonville, respondents most often identified the following (see Figure 7):

- Not enough affordable housing for families (selected by 80.7%);
- Not enough affordable housing for individuals (selected by 74.2%);
- Discrimination by landlords or rental agents (selected by 67.7%);
- Displacement of residents due to rising housing costs (selected by 61.3%);
- Location and type of affordable housing (selected by 61.3%); and
- Not enough affordable housing for seniors (selected by 61.3%).

Notably, responses focused on a lack of availability of affordable housing, issues of discrimination, and displacement of residents due to rising housing costs.

FIGURE 7. RESPONSES TO “DO YOU THINK ANY OF THE FOLLOWING ARE BARRIERS TO FAIR HOUSING IN YOUR COMMUNITY? (CHECK ALL THAT APPLY.)”



IV. ASSESSMENT OF PAST GOALS, ACTIONS AND STRATEGIES

A. If applicable, indicate what fair housing goals were selected by the PHA(s) in past Analysis of Impediments (if prepared jointly with a local government) or Assessment of Fair Housing:

Jacksonville Housing has not previously developed an Assessment of Fair Housing, but partnered with the City of Jacksonville and Duval County in preparing an Analysis of Impediments to Fair Housing Choice in 2016.

i. Discuss what progress has been made toward the achievement of fair housing goals.

Jacksonville Housing has made progress in expanding housing opportunities in recent years by:

- **Administering additional Housing Choice Vouchers.** The agency now administers approximately 8,302 Housing Choice Vouchers.
- **Revitalizing existing affordable housing** through the rehabilitation of four properties with 543 public housing units as part of the Rental Assistance Demonstration (RAD) Project Based Voucher (PBV) program. Jacksonville Housing offers 607 RAD Project Based Vouchers.
- **Construction of The Waves at Jacksonville Beach**, new-construction housing that is part of the RAD-PBV program. The new housing replaces 64 units of public housing with 127 RAD-PBV units.
- **Implementation of HUD-mandated Small Area Fair Market Rents (SAFMRs)**, which set voucher amounts at the neighborhood rather than metro level so that vouchers pay more in high-rent neighborhoods and less in low-rent neighborhoods. SAMFRs are designed to provide voucher holders greater access to high-opportunity areas and to make the voucher program more cost-effective.³
- **Requesting an S&P credit rating to issue bonds for affordable housing development.** Jacksonville Housing expects to receive its S&P credit rating in December 2022, enabling the agency to issue its own bonds in order to build or acquire new affordable housing in Duval County. Jacksonville Housing expects to begin this growth in Fiscal Year 2023, furthering its mission to provide safe, clean, affordable housing and effective social services to low- and moderate-income households. Jacksonville Housing envisions dedicating some of these new units to workforce housing for families with incomes of about 60% to 140% of the area median income. Households in this income range exceed

³ Center on Budget and Policy Priorities. (2018). A Guide to Small Area Fair Market Rents (SAFMRs). How State and Local Housing Agencies Can Expand Opportunity for Families in All Metro Areas. Retrieved from: https://www.cbpp.org/research/housing/a-guide-to-small-area-fair-market-rents-safmrs#safmr_h2

the threshold for many subsidized housing programs but are still often unable to afford safe and clean housing without becoming housing cost burdened.

- ii. 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).**

Jacksonville Housing has not previously developed fair housing goals.

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

The Fair Housing Goals and Priorities section of this Assessment of Fair Housing details additional policies and actions that could mitigate problems that the agency and residents have experienced.

- iv. Discuss how the experience of PHA(s) with past goals has influenced the selection of current goals.**

Jacksonville Housing has not previously developed fair housing goals or completed an Assessment of Fair Housing.