

C. DISABILITY AND ACCESS ANALYSIS

POPULATION PROFILE

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

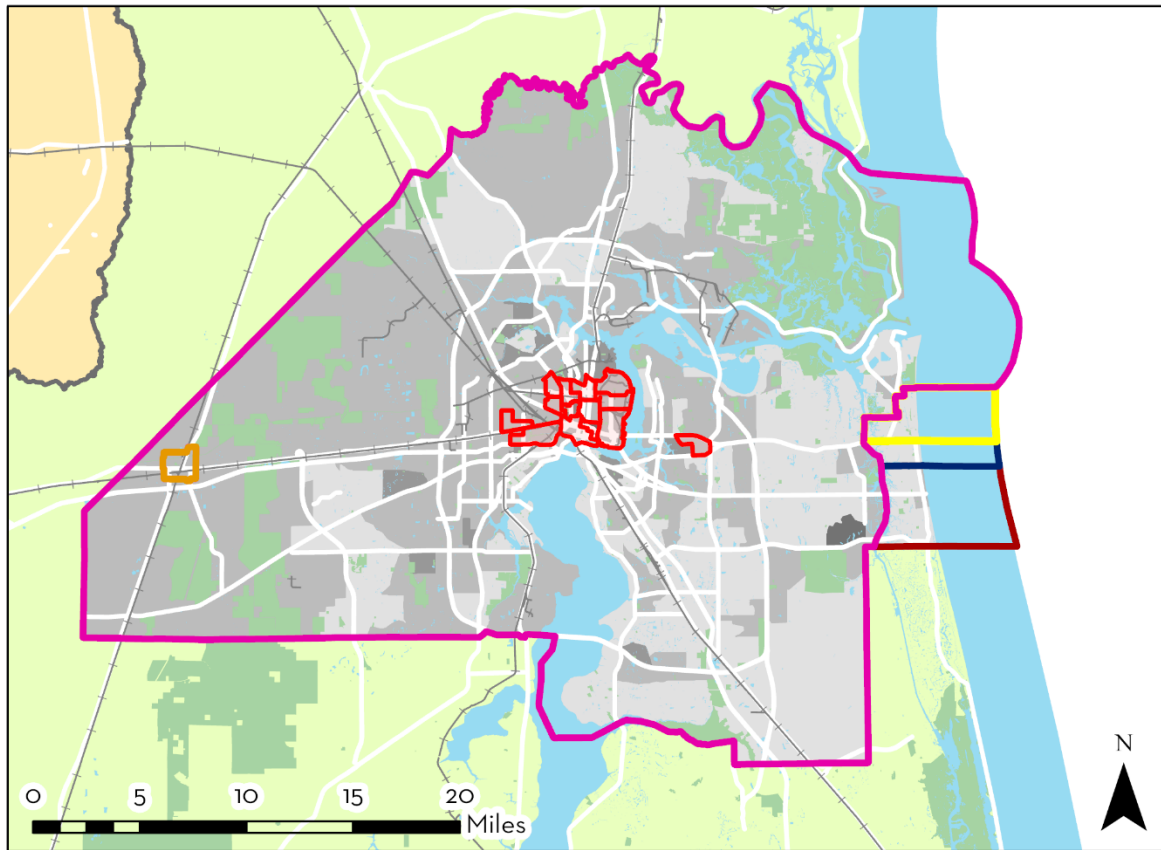
In Jacksonville and Duval County, approximately 13% of the total population has a disability. Most of the rates in the city and county are similar, regardless of the type of disability. The MSA has a greater percentage of residents with hearing difficulties (3.3% compared to 2.9% in the city and county) and a lower percentage of people aged 65+ with disabilities (33.9% compared to 36.8% in the city of Jacksonville).

The census tract with the greatest share of persons with disabilities is in the central city, in an area that is also considered a R/ECAP. Approximately 51.9% of tract 10's population lives with a disability. The region's second highest concentration of persons with disabilities is found in tract 144.22, in which 32.8% of the population has a disability.

Tracts in central Jacksonville, the Northside, and the Westside have disability rates greater than 12% (see Figure 50). Comparing this distribution to Jacksonville's racial geography (see Figure 51) shows that central Jacksonville, the Northside, and the Westside also have higher numbers of Black or African American residents. By contrast, the Southside and the Beaches have a greater number of tracts in which people with disabilities make up less than 12% of the population.

It is worth noting that tract 144.2, located adjacent to the edge of the Southside and the Beaches, contains a relatively high concentration of persons with disabilities in comparison with its surrounding tracts and patterns of dispersion. This may be associated with the presence of Mayo Clinic Florida in this tract.

FIGURE 50: PERCENTAGE OF POPULATION WITH A DISABILITY BY TRACT



Source: 2020 HUD; 2016-2020 5-Year ACS Tables B18101-107

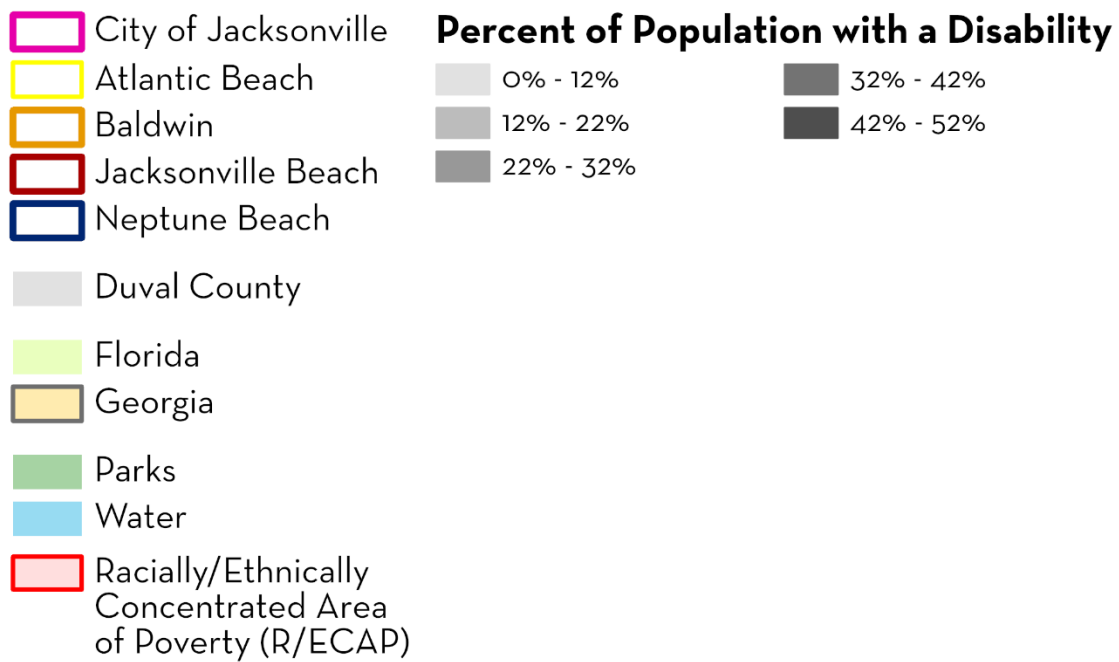
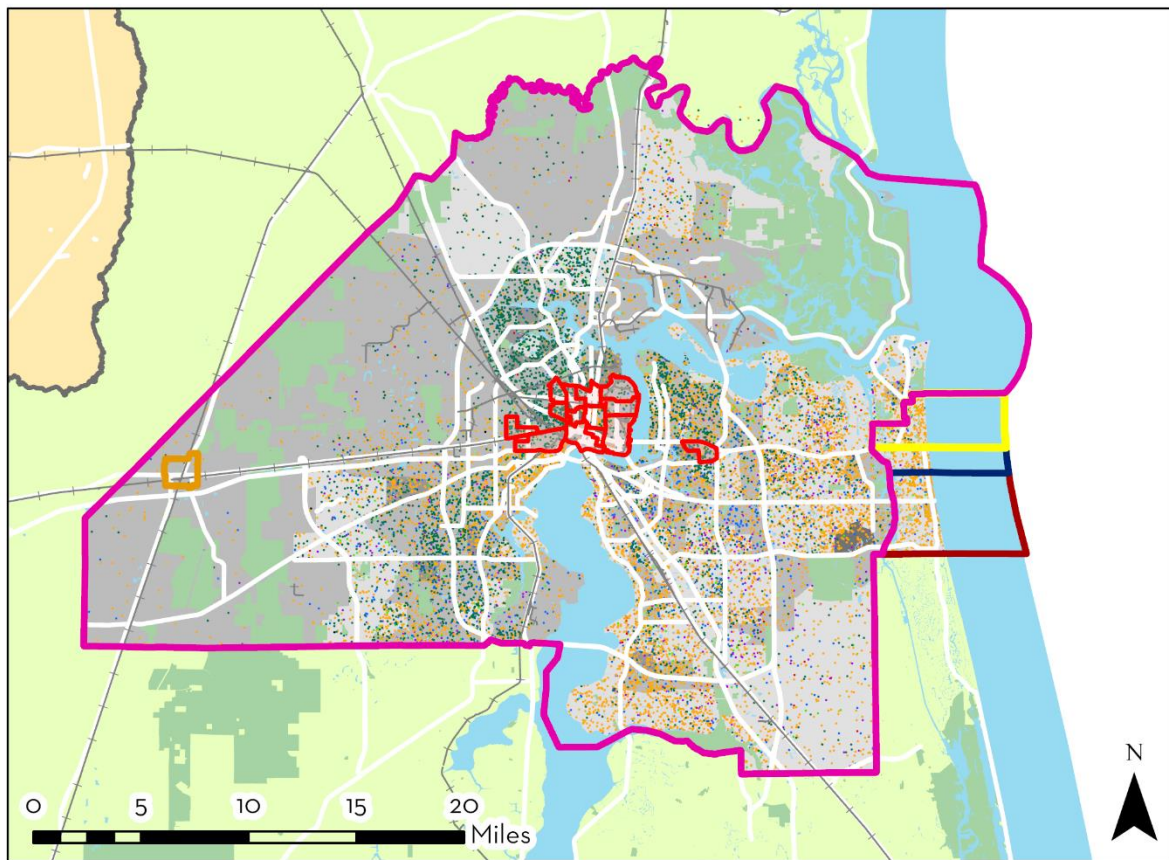


FIGURE 51: PERCENT OF POPULATION WITH DISABILITY AND RACE/ETHNICITY



Source: 2020 HUD; 2016-2020 5-Year ACS Tables B18101-107

- City of Jacksonville
- Atlantic Beach
- Baldwin
- Jacksonville Beach
- Neptune Beach

- Duval County
- Florida
- Georgia
- Parks
- Water
- Racially/Ethnically Concentrated Area of Poverty (R/ECAP)

Percent of Population with a Disability

- 0% - 12%
- 12% - 22%
- 22% - 32%
- 32% - 42%
- 42% - 52%

Race + Ethnicity

1 Dot = 50 People

- White, Non-Hispanic
- Black or African American, Non-Hispanic
- Hispanic (of any race)
- Asian or Pacific Islander, Non-Hispanic
- Multiple Races, Non-Hispanic
- Native American, Non-Hispanic
- Other Race, Non-Hispanic

ii. **Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges for the service area and region.**

In Duval County, an estimated 119,076 people have a disability, representing 12.9% of the total population. Seniors (age 65 or older) have the highest disability rates across all geographies at 36% in Jacksonville and Duval County (see Table 13). In contrast, the rate for those aged 18 to 64 is 11%, and just 4.6% of children under age 18 have a disability. The spatial distribution of residents with disabilities is similar to that of the county's total population, clustered in central Jacksonville, the Beaches, and Southside Jacksonville, with lower densities in northern Duval County. These geographic patterns remain similar for all people with disabilities, regardless of type or age range (see Figure 52 and Figure 53).

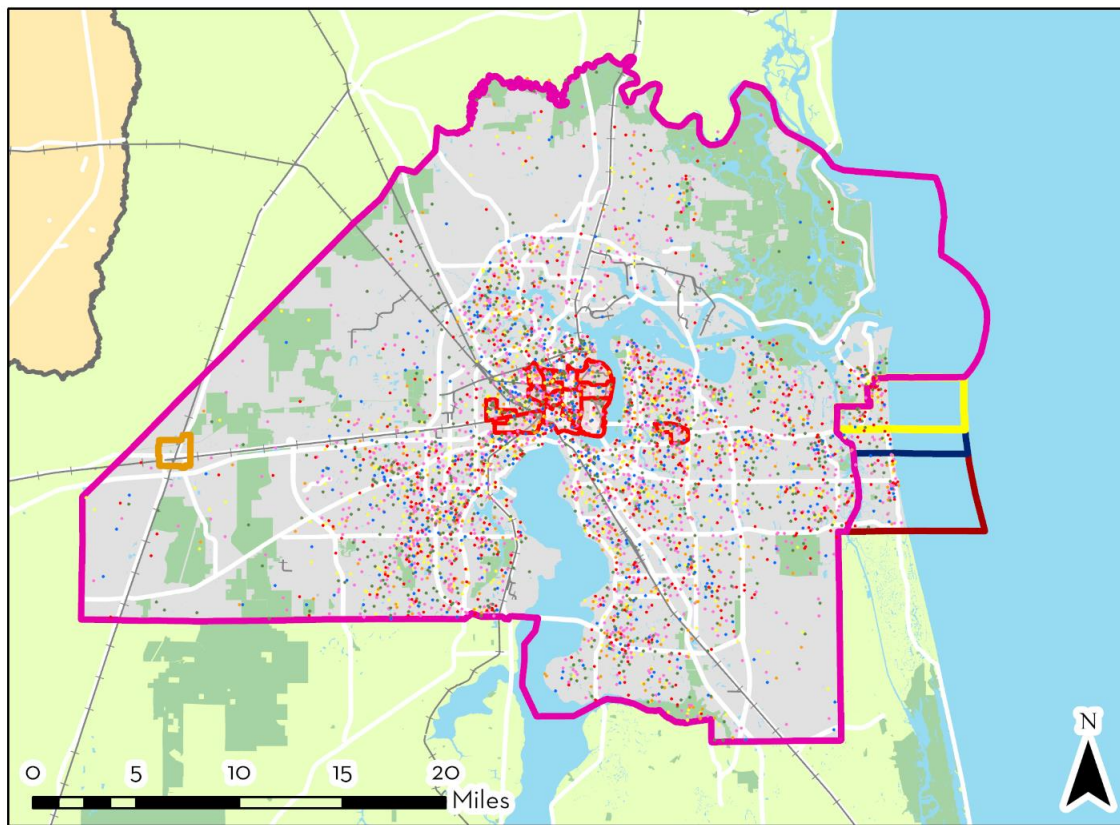
TABLE 13: DISABILITY BY AGE GROUP

Disability Type	JACKSONVILLE		DUVAL COUNTY		JACKSONVILLE MSA	
	#	%	#	%	#	%
Age 0 to 17 with Disabilities	9,464	4.6%	9,743	4.6%	15,808	4.6%
Age 18 to 64 with Disabilities	60,804	11.0%	62,311	10.7%	99,187	10.8%
Age 65+ with Disabilities	44,711	36.8%	47,022	36.1%	80,444	33.9%

Source: 2016-2020 5-Year American Community Survey, Table B18101.

NOTE: All % represent a share of the total population within the jurisdiction or region within each age group.

FIGURE 52: DISABILITY BY TYPE



Source: 2016-2020 5-Year ACS Tables B18101-107

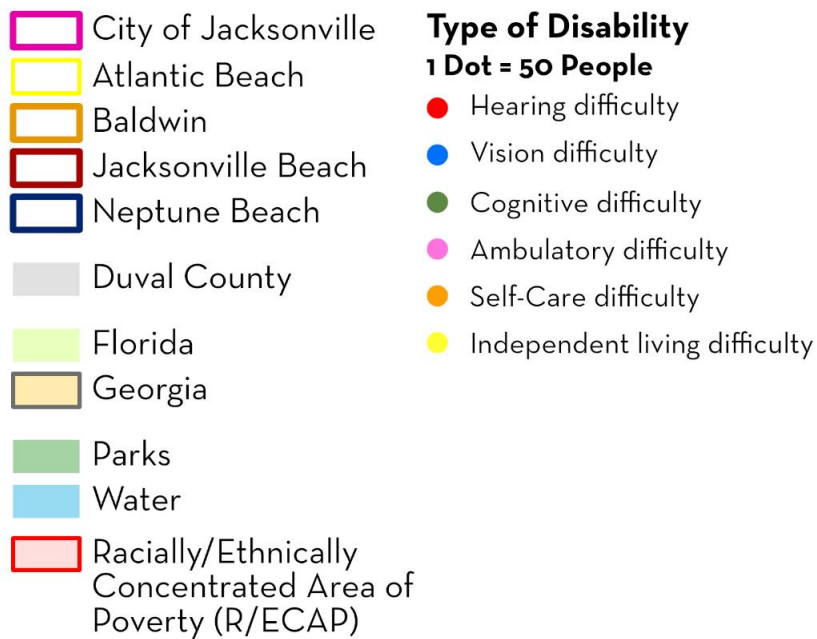
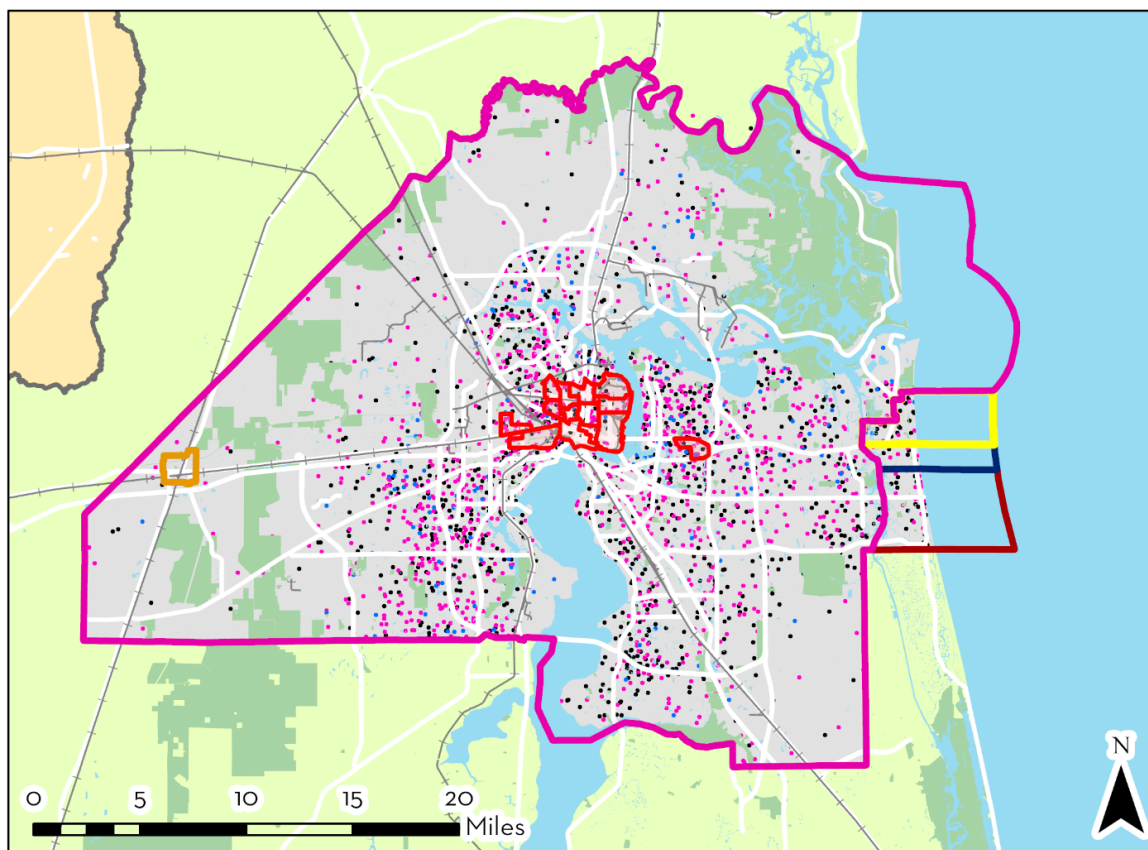


FIGURE 53: DISABILITY BY AGE GROUP



Source: 2016-2020 5-Year ACS Table B18101

- City of Jacksonville
- Atlantic Beach
- Baldwin
- Jacksonville Beach
- Neptune Beach
- Duval County
- Florida
- Georgia
- Parks
- Water
- Racially/Ethnically Concentrated Area of Poverty (R/ECAP)

People with a Disability by Age Group

1 Dot = 50 People

- Population 5 to 17 years with a Disability
- Population 18 to 64 years with a Disability
- Population 65+ years with 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. Difficulty with independent living and cognitive difficulties are the next most common disabilities, impacting approximately 5% of the population in both geographies. People with difficulty hearing comprise around 3% of the population. Difficulties with vision and self-care are the two least common disability types, each affecting approximately 2.5% of the population in both the city and the county (see Table 14).

TABLE 14: DISABILITY BY TYPE

Disability Type	JACKSONVILLE		DUVAL COUNTY		JACKSONVILLE MSA	
	#	%	#	%	#	%
Hearing Difficulty	25,510	2.9%	26,903	2.9%	49,490	3.3%
Vision Difficulty	21,976	2.5%	22,783	2.5%	36,606	2.4%
Cognitive Difficulty	44,501	5.4%	45,835	5.3%	72,346	5.1%
Ambulatory Difficulty	61,920	7.6%	63,993	7.4%	103,200	7.3%
Self-Care Difficulty	20,750	2.5%	21,550	2.5%	34,160	2.4%
Independent Living Difficulty	38,258	5.7%	39,666	5.6%	62,450	5.4%

Source: 2016-2020 5-Year American Community Survey, Tables B18102 to B18107.

NOTE: All % represent a share of the total population within the jurisdiction or region.

HOUSING ACCESSIBILITY

- i. **Describe whether there is an adequate supply of housing that is accessible to persons with disabilities in the service area and region. Include a description of affordability, housing in a range of unit sizes, accessibility for different types of disabilities, and location as it relates to segregated areas, R/ECAPs, and areas with greater access to opportunity assets.**

An estimated 12.7% of the U.S. population had a disability as of the American Community Survey Five-Year Estimates for 2016-2020. Research has found an inadequate supply of housing that meets the needs of people with disabilities and allows for independent living. The U.S. Department of Housing and Urban Development identified that approximately one third of the nation's housing stock can be modified to accommodate people with disabilities, but less than 1% is currently accessible by wheelchair users.³⁴

Identifying and quantifying existing accessible housing for all disabilities is a difficult task because of varying needs associated with each disability type. Unique housing requirements for

³⁴ Chan, S., Boshier, L., Ellen, I., Karfunkel, B., & Liao, H. (2015). Accessibility of America's Housing Stock: Analysis of the 2011 American Housing Survey. U.S. Department of Housing and Urban Development: Office of Policy Development and Research.

people with an ambulatory difficulty may include accessibility improvements such as ramps, widened hallways and doorways, and installation of grab bars, along with access to community services such as transit. People with hearing difficulty require modifications to auditory notifications like fire alarms and telecommunication systems while visually impaired individuals require tactile components in design and elimination of trip hazards. Housing for people that have difficulty with cognitive functions, self-care, and independent living often require assisted living facilities, services, and staff to be accessible.

For low- and moderate-income households, the costs of these types of home modifications can be prohibitive, and renters may face particular hardships, as they could be required to pay the costs not just of the modifications, but also the costs of removing or reversing the modifications if they later choose to move. Modifications and assisted living arrangements tend to pose significant costs for people with disabilities, who already experience more difficulty affording housing compared to populations with no disability. Affordability refers to housing that does not impose a cost burden on its occupants, in which no more than 30% of household income is spent on living expenses. Studies have found that 55% of renter households that have a member with a disability have housing cost burdens, compared with 45% of those with no disabilities.³⁵

According to Section 504 of the Rehabilitation Act of 1973, any federally assisted new multifamily housing with five or more units constructed after 1988 must include a minimum of 5% of units accessible to persons with mobility impairments and an additional 2% of units accessible to persons with vision/hearing impairments (or one unit of each type, whichever is greater). Additionally, HUD provides support for affordable accessible housing through its Section 202 Supportive Housing for the Elderly and Section 811 Supportive Housing for Persons with Disabilities programs.

Using 2020 HUD data, a total of nine Section 202/811 properties were identified in Jacksonville. There are two census tracts with more than one 202/811 property: tract 166.04, which contains San Jose Manor I and II, and tract 126.02, which contains the Duval Association for Residential Care and Enclaves Apartments.

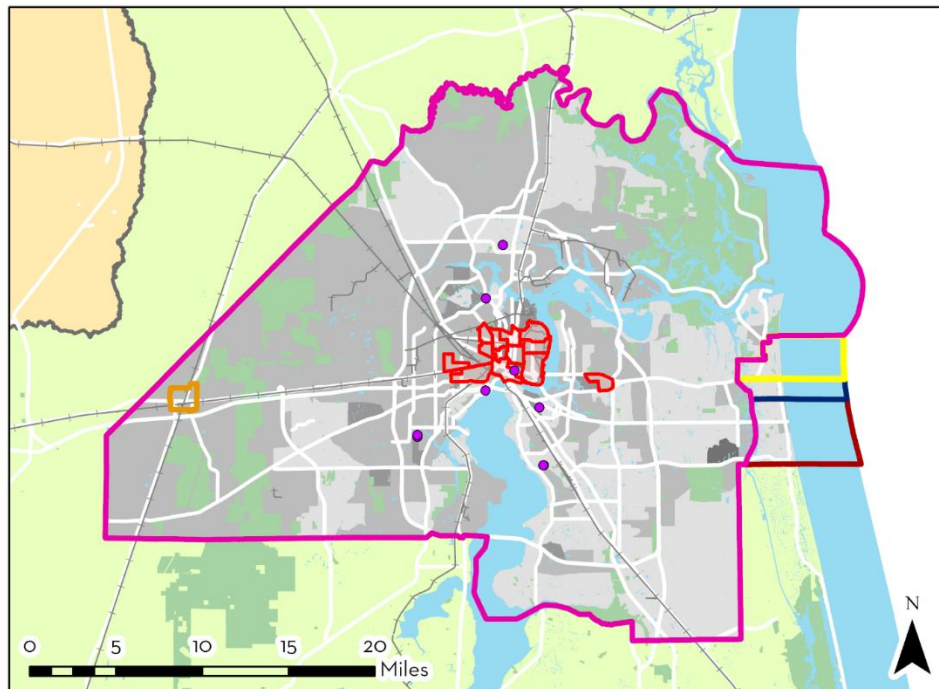
One of these properties, Cathedral Court, is located in R/ECAP tract 10, referenced at the start of this section's analysis. The central location of this property and its accessible status have most likely contributed to this census tract having the highest concentration of persons with disabilities in the area.

However, including this development, only three 202/811 properties were in tracts with a concentration of persons with disabilities greater than 12%. It is worth noting that most of the

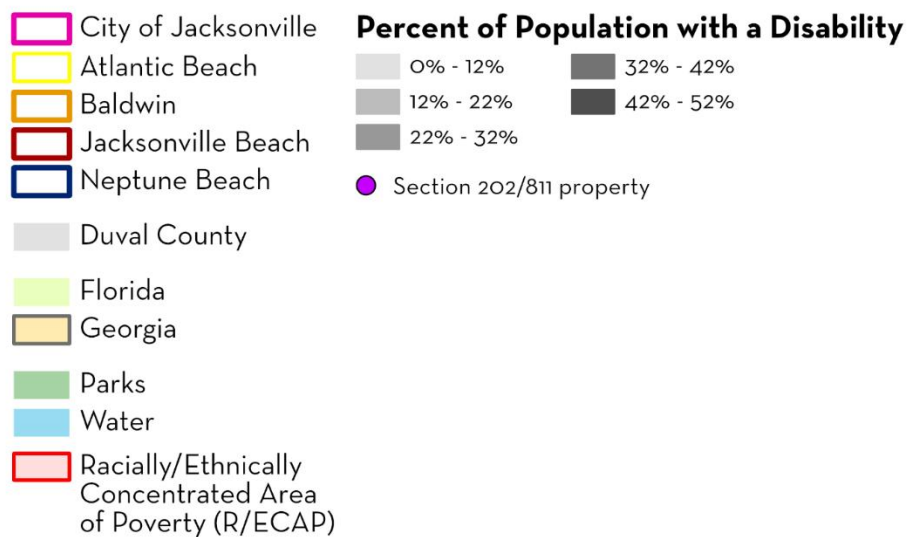
³⁵ America's Rental Housing 2017. (2017). Joint Center for Housing Studies of Harvard University.

Section 202/811 properties in the region are located near central Jacksonville, despite notable percentages of residents with disabilities residing in the northern and western portions of the region (Figure 54). As such, the existing supply of HUD-assisted accessible housing is inadequate compared to the region's need for this type of housing.

FIGURE 54: HUD ASSISTED ACCESSIBLE HOUSING



Source: 2020 HUD; 2016-2020 5-Year ACS Tables B18101-107



Of those who participated in the community survey, 12.5% of respondents noted that one of the reasons they were not able to move to another area of Jacksonville was because there were few housing options that are accessible to people with disabilities. 41.2% of respondents also believed that “a lot more” senior housing and housing for people with disabilities is needed in the region.

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

Publicly supported housing is often a key source of accessible and affordable housing for people with disabilities. Jacksonville Housing Authority offers approximately 8,302 Housing Choice Vouchers and 2,332 public housing units in the Jacksonville MSA. The shares of residents with disabilities residing in publicly subsidized housing in Duval County and the Jacksonville MSA are shown below. In both the county and the MSA, the share of residents with a disability living in public housing units (28.6%, see Table 15) is more than double the share of the overall city and county’s population with a disability, which is approximately 13.0%.

The share of Housing Choice Voucher recipients with a disability in both the county and MSA (approximately 21.3%) is also significantly larger than the disability rate of the city’s population. Section 202 and 811 households were included in the other multifamily program category, which explains why the share of participants with a disability (34.7%) is more than 2.5 times the city’s overall disability rate. Breaking down these rates further shows that 100% of participants in the Section 811 program have a disability, while 2% of Section 202 program participants are disabled. Residents of project-based Section 8 properties have a lower disability rate (11.0%) than those in the city overall.

These numbers suggest that these programs are a significant component of the area’s supply of affordable and accessible housing. The lack of accessible units available in the private rental market and the high utilization of publicly supported programs for affordable and accessible units demonstrate that the need for accessible housing options in Jacksonville and Duval County is not met by the current supply.

Stakeholders who participated in this planning process also noted a need to increase housing options for people with disabilities, emphasizing that a large majority of this population relies on fixed income payments through Social Security and vouchers that are insufficient to cover all necessary living expenses and cannot accommodate for any increases in rent.

TABLE 15: DISABILITY BY PUBLICLY SUPPORTED HOUSING PROGRAM CATEGORY

Housing Type	SHARE OF RESIDENTS WITH A DISABILITY	
	Duval County	Jacksonville MSA
Public Housing	28.6%	28.6%
Project-Based Section 8	11.0%	11.1%
HCV Program	21.3%	21.4%
Other Multifamily	34.7%	34.7%

Source: 2020 HUD AFFHT0006

iii. To what extent are common areas, rental offices, or other public spaces associated with a PHA's facilities accessible to persons with disabilities?

According to its PHA Annual Plan, Jacksonville Housing will make reasonable accommodations for individuals with disabilities (as defined by law) when necessary and appropriate to provide equal access to amenities, services, and programs. A reasonable accommodation may include an adjustment to rules or practices, or a reasonable modification to living space or common areas. Accommodations that impose an undue financial or administrative burden on the Jacksonville Housing Authority are not reasonable and will not be provided.

iv. Describe PHA policies and practices related to communication with applicants and residents with disabilities?

According to Jacksonville Housing's Annual Plan for FY22 and its 5-Year PHA Plan for FY21-25, all notices and communications with both applicants and residents must take into consideration accommodations for persons with disabilities including those with physical, visual, and hearing impairments.

INTEGRATION OF PERSONS WITH DISABILITIES LIVING IN INSTITUTIONS AND OTHER SEGREGATED SETTINGS

i. To what extent do persons with disabilities in or from the service area or region reside in segregated or integrated settings?

Prior to the Americans with Disabilities Act in 1991 and the U.S. Supreme Court's ruling in *Olmstead v. L.C.* in 1999, many people with disabilities lived in institutional facilities with little to

no access to the greater community.³⁶ In *Olmstead*, the Supreme Court held that jurisdictions are required to provide community-based services for persons with disabilities who would otherwise be entitled to institutional services when: (a) such placement is appropriate; (b) the affected person does not oppose such treatment; and (c) the placement can be reasonably accommodated, taking into account the resources available to the state and the needs of other individuals with disabilities.

A portion of the disabled population is served through HUD's Continuum of Care (CoC) program, which funds permanent supportive housing (PSH) for persons with disabilities in addition to other housing types. PSH uses permanent housing with indefinite leasing or rental assistance and pairs it with supportive services to assist homeless persons with a disability or families with an adult or child member with a disability achieve housing stability. Programs such as these help those living in institutions transition to more permanent, integrated housing. However, there are still those that reside in group quarters such as nursing facilities for a number of reasons. According to 2020 DEC Redistricting Data (PL 94-171), there were 6,051 residents living in nursing facilities/skilled nursing facilities in Duval County and 10,263 in the Jacksonville MSA.

ii. Is there an adequate supply of accessible housing in community-based integrated settings in the service area and region? Include a description of the range of accessible and affordable units and access to supportive services for persons with disabilities.

In addition to the accessible housing provided by Jacksonville Housing, several non-profit organizations work in the region to provide affordable accessible housing and supportive services to people with disabilities.

These organizations include:

- Ability Housing
 - Operates CASA, which is comprised of 22 single-family scattered rental properties that are reserved for adults with disabilities who wish to live independently in community-based settings
 - Operates the Village on Mercy, which is comprised of 166 affordable housing units. 13% of residents live with a disability
 - Operates the Village at Hyde Park, a 3-story garden apartment that provides units accessible to persons with mobility, hearing, and/or vision impairments.
- CIL Jacksonville

³⁶ Americans with Disabilities Act (ADA). U.S. Department of Justice Civil Rights Division

- Operates the Housing Assistance and Referral Program (HARP), which provides referrals to apartment complexes to help people with disabilities find safe, affordable, and accessible housing. As of July 25th, 2022, the waitlist for HARP is currently full.
- Offers a wide variety of supportive services and resources for persons with disabilities, including an equipment loan service, communication services, employment services, and educational services.
- The Arc Jacksonville
 - Operates The Arc Jacksonville Village, which offers 97 one-and-two-bedroom affordable rental apartments for adults with intellectual and developmental disabilities.
 - Operates 5 community homes with a total of 44 residents that are supported by individualized care plans
 - Is the referral agency for the Special Needs Housing Referral Program, which is part of Florida's Link to Permanent Housing Initiative.

iii. Identify and describe where the PHA, any local governments in the PHA's service area, or the State have implemented Olmstead plans or other relevant plans to achieve greater integration for persons with disabilities.

In 2009, the Florida Housing Finance Corporation implemented the Link to Permanent Housing Initiative. This initiative is meant to provide opportunities for extremely low income (ELI) households with intellectual and developmental disabilities to access affordable rental housing.

iv. Describe the efforts the PHA has undertaken to assist persons with disabilities either transitioning from institutions or persons with disabilities at serious risk of institutionalization in accessing PHA assisted housing. Examples of such efforts may include participation in Olmstead plans or agreements, interagency coordination, implementation of admissions preferences including remedial preferences, enhanced outreach, maintaining accessible housing lists or registries, use of project-based vouchers, HUD-VASH vouchers, and administering non-elderly disabled (NED) vouchers.

As stated in their FY2022 Annual Plan, Jacksonville Housing holds preferences for families that include a person with disabilities for their assisted housing programs. It also takes into account disability status when determining a household's rent, or Total Tenant Payment (TTP). Rent is based on a family's anticipated gross annual income less deductions, if any. JH will exclude from annual income the following allowances: \$480 for each dependent; \$400 for any family whose

head or spouse is elderly or a person with a disability; and some medical deductions for families headed by an elderly person or a person with disabilities.

As of September 2022, Jacksonville Housing has been awarded 178 Five-Year Mainstream vouchers and no Non-Elderly Persons with Disabilities (NED) vouchers, both of which are Special Purpose vouchers that are appropriated by Congress exclusively for people with disabilities.

DISPARITIES IN ACCESS TO OPPORTUNITY

- i. To what extent are persons with disabilities in the service area and region able to access opportunity assets related to education, jobs, and transportation? Are there areas in the service area or region with greater or less access to public and private infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals, transportation, proficient schools and educational programs, and jobs).**

Conversations with community members and stakeholders revealed that access to resources and services such as education, jobs, and transportation varies geographically across the region, with most opportunities found in central Jacksonville and the Southside. Those lacking access to a vehicle must rely on public transportation, which does not provide equal access to all areas of the region. The Jacksonville Transit Authority (JTA) does provide a paratransit service, known as Connexion, for persons with disabilities who are functionally unable to use fixed-route services for some or all their transportation needs, and for people who are transportation disadvantaged (TD). Connexion customers must be certified as eligible under either the guidelines of the Americans with Disabilities Act (ADA) or TD program. However, to use this service, reservations must be made in advance.

- ii. Describe the PHA's process for persons with disabilities, including assisted households and those on the waiting list, for requesting and obtaining reasonable accommodations and accessibility modifications.**

In Section 24 of Jacksonville Housing's FY21-25 Five Year Plan, the process for requesting accommodations for persons with disabilities is as follows:

"If you have a disability or any member of your household listed on this Lease has a disability, JHA shall provide reasonable accommodation to the extent necessary to provide this individual with an opportunity to use and occupy the unit in a manner equal to all other residents. You may request, at any time during your residency, that JHA provide reasonable accommodation, so that you can meet lease requirements or other requirements of tenancy. JHA may terminate the lease if you submit false

statements or falsify any documentation in order to receive a reasonable accommodation.”

If a resident asks to be considered for a modification to their unit or a transfer request due to a medical reason, they will be given the Report for Transfer/504 Modification for their medical service provider to fill out. The “medical service provider” can be a physician, nurse, physical therapist or any other medical professional who can certify as to the resident’s medical need. When they return to their service worker with the completed report, the worker will fill out the 504 Assessment letter and the Accommodation Request letter. The 504 Assessment, the Accommodation Request letter, the Report for Transfer/504 Modification, and a copy of psychosocial assessment will be sent to the community manager, Vice-President, application supervisor, and technical services coordinator. The service worker will also keep a copy of the request. This procedure ensures no delays in processing the resident request. Requests of a non-medical nature are handled between the manager and resident.

For applicants requiring reasonable accommodations, the applicable Applications Department should be contacted. A request by an applicant or tenant for a specific, identified person to serve as a live-in aide is treated as a request for reasonable accommodation to ordinary JHA policies and procedures. A request for a live-in aide may be made either orally or in writing (preferably in writing) and must demonstrate the connection between the person’s age or disability and the requested accommodation.

DISPROPORTIONATE HOUSING NEEDS

i. Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities in the service area and region.

As discussed in the prior sections, there is a significant shortage of affordable housing overall. This shortage is further exacerbated for persons with disabilities seeking housing, as they may require certain accessibility features. This requires either obtaining housing already equipped with these features or making modifications to existing housing to accommodate these needs. Both options are costly, making them out of reach to many people with disabilities living on fixed incomes. Moreover, persons with certain types of disabilities may require additional supportive services, which may place certain geographic restraints on where they can live depending on where these services are available, further limiting the availability of housing. Additionally, based on stakeholder interviews and reviews of fair housing cases in the region, persons with disabilities residing in publicly assisted housing often experience substandard housing conditions that exacerbate their disabilities.

ADDITIONAL INFORMATION

- i. **Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the service area and region, including those affecting persons with disabilities with other protected characteristics.**
- ii. **The PHA may also describe other information relevant to its assessment of disability and access issues.**

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. The Jacksonville Housing Authority does not have legislative power to override or revamp the zoning ordinance, comprehensive plan, or other planning regulations and policies but must work within its parameters. JHA can, however, work with its partners to advocate for more flexible zoning to help meet the ever-increasing demand for more affordable and accessible housing and work with the City to take advantage of recently enacted state law that gives local governments broad authority to incentivize and approve affordable housing development.

Impediment: Shortage of Handicapped Accessible Housing

It is common for local governments to use their zoning code's definition of "family" to limit the number of unrelated persons who may live together in a single dwelling as a means of preserving the stable, traditional, and residential character of their neighborhoods. However, unreasonably restrictive definitions may limit housing for nontraditional families, who in every sense but a biological one, share the characteristics of a traditional family related by blood or marriage. Restrictive definitions of family also may have the effect of limiting fair housing choice for persons with disabilities who reside together in supportive or congregate living situations. The Jacksonville Property Safety and Maintenance Code has a permissive definition of family: "one individual living alone or two or more individuals living together, whether related to each other by birth or not, and having common housekeeping facilities." Jacksonville's Zoning Code, however, defines family more narrowly as:

One or more persons occupying a single dwelling unit; provided, that, unless all members are related by law, blood, adoption or marriage, no family shall contain over five persons.

The definition expressly excludes group care homes, residential treatment facilities, recovery home or nursing home, foster care home or family care home, which limits their placement by right in single family zoning districts. Supportive housing meeting the definition of a “community residential home” for six or fewer residents must be “deemed a single-family unit and a non-commercial, residential use for the purposes of local laws and ordinances” and as such a permitted use in all residential zoning districts in accordance with state law (F.S. § 419.001(2)).³⁷

However, as permitted by state law, Jacksonville’s zoning code also imposes spacing requirements on community residential homes. Such homes cannot be located within a radius of 1,000 feet of another existing community residential home with six or fewer residents/beds. (Ordinance Code Sec. 656.401(h)). Community residential homes with 7-14 residents may be permitted by exception in all residential zoning districts, however, the home cannot be located within a radius of 1,200 feet of another existing such home with 14 or fewer residents/beds or 500 feet from an area zoned AGR, RR, RLD or RMD-A.

While these spacing limits are congruent with the state standards for site selection of community residential homes, the state statute provides that local governments may adopt more liberal standards for siting such homes. The Department of Justice and HUD take the position, and federal courts that have addressed the issue mostly agree, that spacing and density restrictions are generally inconsistent with the FHA unless the jurisdiction could make a showing that the ordinance was passed to protect a compelling governmental interest (e.g. over-concentration of residential treatment homes could adversely affect individuals with disabilities and would be inconsistent with the goal of integrating persons with disabilities into the wider community) and that the spacing requirement is the least restrictive means of protecting that interest.³⁸ Jacksonville’s spacing requirements limit the overall aggregate

³⁷ The legislature intended to protect such group homes from local zoning ordinances and restrictive covenants that would exclude them from the traditional single-family neighborhood. See *Dornbach v. Holley*, 854 So.2d 211 (Fla. App. 2002) (the group home at issue was the functional equivalent of a single-family residential unit and attempts to enforce neighborhood deed restrictions to restrict community residential homes for six or fewer residents with disabilities are impermissibly discriminatory under the FHA and Florida Fair Housing Act and the public policy of F.S. Section 419.001(2)).

³⁸ See, e.g., *Horizon House Developmental Serv., Inc. v. Township of Upper Southampton*, 804 F.Supp. 683, 693 (E.D.Pa. 1992) (invalidating 1,000 foot separation requirement), aff’d without opinion, 995 F.2d 217 (3rd Cir. 1993). Other courts also have found in the context of a municipality’s refusal to grant an exception to the spacing requirement, that the local government violated the reasonable accommodation requirements of the FHA. See *Oconomowoc Residential Programs, Inc. v. City of Milwaukee*, 300 F.3d 775 (7th Cir. 2002) (affirming summary judgment for plaintiff on finding that city failed to put forth evidence regarding the nature or quantity of the purported undue financial and administrative burdens that would supposedly result from granting a reasonable accommodation to the spacing requirement for group homes); *“K” Care, Inc. v. Town of Lac du Flambeau*, 181 Wis.2d 59, 510 N.W.2d 697 (Wis. Ct. App. 1993) (town required to accommodate elderly by granting special exception to state statute imposing 2,500-foot spacing requirement in that proposed extra facility would not adversely affect residential character of neighborhood); *Tellurian U.C.A.N., Inc. v. Goodrich*, 178 Wis. 2d 205, 504 N.W.2d 342 (Wis. Ct. App. 1993) (village violated FHAA

capacity of housing for persons with disabilities, even if the need in the community or region is greater than the thresholds permit.

A valid government justification may be that over-concentration of family care facilities would be inconsistent with the objective of integrating persons with disabilities into the community. However, this should never justify separations which have the effect of foreclosing entire neighborhoods to group housing for persons with disabilities. In Jacksonville, housing providers of community residential homes may seek a reasonable accommodation from the spacing requirements. To address concerns about concentrating group care homes, Jacksonville also could offer incentives to providers to locate future homes in other neighborhoods.

As part of a settlement agreement resolving Fair Housing Act claims by the DOJ and nonprofit housing providers, Jacksonville amended its zoning code on May 23, 2017, to: include a procedure approved by the DOJ for persons with disabilities to request reasonable accommodations from provisions of the zoning code; explicitly recognize that a disabled resident's receipt of supportive services in a dwelling unit does not change the classification of the dwelling unit into another type of differently regulated use; remove restrictions that apply to housing for persons with disabilities; allow group care homes for persons with disabilities by exception in the RMD-S district; and allow residential treatment facilities by exception in the CCG-S district.³⁹

ACCESSIBLE DESIGN AND CONSTRUCTION COMPLIANCE

Stakeholders identified as a barrier to quality accessible housing that developers and property managers of covered multifamily housing often lack education and understanding about accessibility requirements. A common complaint by tenants with disabilities regards the lack of accessibility features, accessible routes, handicap parking design, and the like, after construction or renovations of the buildings are complete, when modifications are more costly and burdensome to both the tenant and housing provider. Tenants have reported substandard conditions (like mold, rodents, no work air conditioning or heating) that exacerbate their disabilities. Jacksonville could put into place more training regarding the FHA's design and construction requirements for covered multifamily housing with its planning department, building inspections division, and code compliance division, who then have responsibility to educate and implement compliance protocols on the front end with developers and property

by not granting exception to spacing restriction where exception was feasible, practical, and would not entail undue burdens to the village).

³⁹ *United States v. City of Jacksonville*, Civil Action No. 3:16-cv-1563 (M.D. Fla.).

managers before issuing plan approvals, building permits, certificates of occupancy, or renewing business licenses.

DISABILITY AND ACCESS ISSUES CONTRIBUTING FACTORS

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

A lack of affordable accessible housing for persons with disabilities in the region was one of the most common issues found in our public engagement interactions and supported by our data and map analyses. The rates of persons with disabilities assisted by JH's public housing and HCV programs were 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/properties to meet area demand, especially for those with disabilities. Moreover, the location of affordable accessible housing was concentrated in the central region of Jacksonville either within or adjacent to R/ECAPS, further limiting the housing options for persons with disabilities.

Priority Contributing Factors

- Access to publicly supported housing for persons with disabilities.
- Access to transportation for persons with disabilities.
- Location of accessible housing.
- Lack of affordable, accessible housing in range of unit sizes.
- Lack of affordable in-home or community-based supportive services.
- Lack of affordable, integrated housing for individuals who need supportive services.

Additional Contributing Factors

- Inaccessible public or private infrastructure.
- Lack of assistance for transitioning from institutional settings to integrated housing.
- Lack of public and/or private investment in specific neighborhoods, including services or amenities.
- State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, and other integrated settings.

D. PUBLICLY SUPPORTED HOUSING ANALYSIS

PUBLIC HOUSING AGENCY PROGRAM ANALYSIS

Publicly supported housing encompasses several strategies and programs developed since the 1930s by the federal government to ameliorate housing hardships that exist in neighborhoods throughout the country. The introduction and mass implementation of slum clearance to construct public housing projects during the mid-1900s signified the beginning of publicly supported housing programs. Government-owned and -managed public housing was an attempt to alleviate problems found in low-income neighborhoods such as overcrowding, substandard housing, and unsanitary conditions. Once thought of as a solution, the intense concentration of poverty in public housing projects often exacerbated negative conditions that would have lasting and profound impact on their communities.

Improving on public housing's model of high-density, fixed-site dwellings for very low-income households, publicly supported housing programs have since evolved into a more multi-faceted approach overseen by local housing agencies. The Housing and Community Development Act of 1974 created Section 8 rental assistance programs. Section 8, also referred to as the Housing Choice Voucher (HCV) program, provides two types of housing vouchers to subsidize rent for low-income households: project-based and tenant-based. Project-based vouchers can be applied to fixed housing units in scattered site locations while tenant-based vouchers allow recipients the opportunity to find and help pay for available rental housing on the private market.

The Tax Reform Act of 1986 created the Low-Income Housing Tax Credit (LIHTC) program to incentivize development of affordable rental-housing development. Funds are distributed to state housing finance agencies that award tax credits to qualified projects to subsidize development costs. Other HUD Programs including Section 811 and Section 202 also provide funding to develop multifamily rental housing specifically for disabled and elderly populations.

The now-defunct HOPE VI program was introduced in the early 1990s to revitalize and rebuild dilapidated public housing projects and create mixed-income communities. Although HOPE VI achieved some important successes, the Choice Neighborhoods Initiative program was developed to improve on the lessons learned from HOPE VI. The scope of Choice Neighborhoods spans beyond housing and addresses employment access, education quality, public safety, health, and recreation.⁴⁰

⁴⁰ Department of Housing and Urban Development. Evidence Matters: Transforming Knowledge Into Housing and Community Development Policy. 2011. www.huduser.gov/portal/periodicals/em/EM-newsletter_FNL_web.pdf.

Current publicly supported housing programs signify a general shift in ideology toward more comprehensive community investment and de-concentration of poverty. However, studies have shown a tendency for subsidized low-income housing and housing vouchers to cluster in disadvantaged, low-income neighborhoods. Programmatic rules and the point allocation systems for LIHTC are thought to play a role in this clustering and recent years have seen many states revising their allocation formulas to discourage this pattern in new developments.⁴¹ The reasons for clustering of HCVs are more complicated since factors in decision-making vary greatly by individual household. However, there are indications that proximity to social networks, difficulties searching for housing, and perceived or actual discrimination contribute to clustering.⁴² This section will review the current supply and occupancy characteristics of publicly supported housing types and its geographic distribution within Duval County.

TABLE 16: PUBLICLY SUPPORTED HOUSING UNITS BY PROGRAM CATEGORY

Housing Units	DUVAL COUNTY		JACKSONVILLE MSA	
	#	%	#	%
TOTAL HOUSING UNITS	413,084		808,116	
Public Housing	2,322	0.6%	2,451	0.4%
Project Based Section 8	6,612	1.6%	7,142	1.1%
HCV Program	6,624	1.6%	7,896	1.2%
Other Multifamily	581	0.1%	581	0.1%
LIHTC Program	13,623	3.3%	16,048	2.4%
TOTAL PUBLIC HOUSING UNITS	29,762	7.2%	34,118	5.2%

Source: 2016-2020 ACS Table B25001; 2022 JHA; 2021 APSH; HUD User LIHTC Database

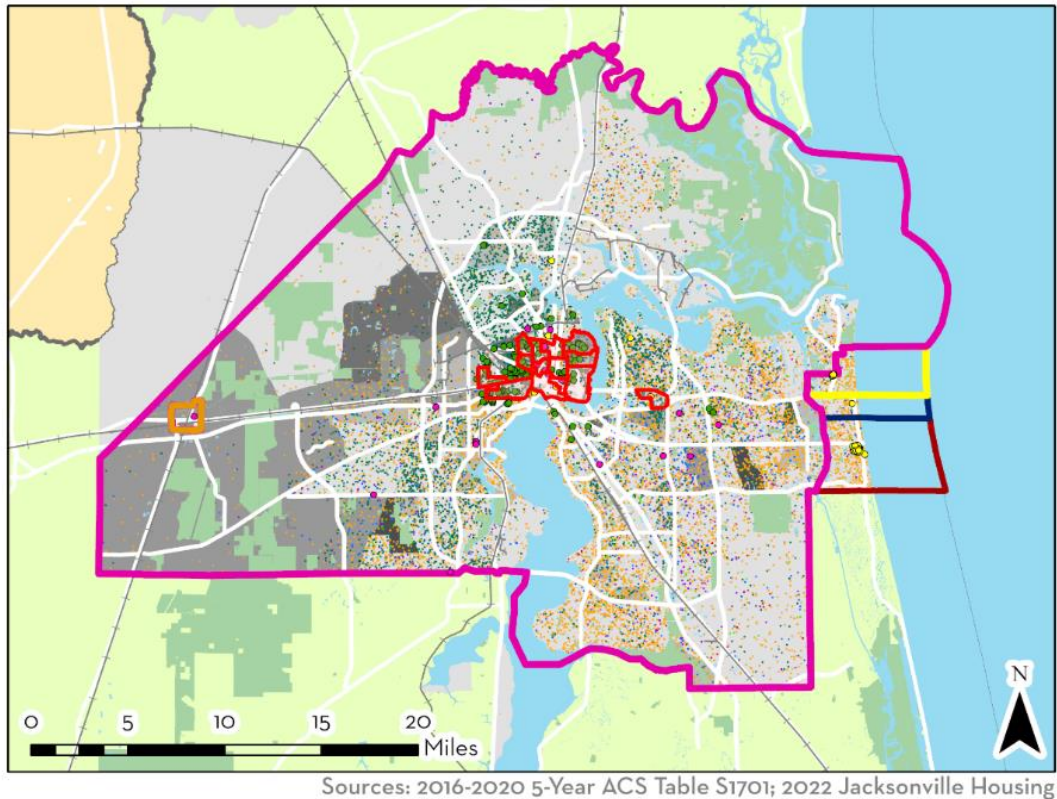
⁴¹ Dawkins, Casey J. Exploring the Spatial Distribution of Low-Income Housing Tax Credit Properties. US Department of Housing and Urban Development, www.huduser.gov/publications/pdf/dawkins_exploringliht_assistedhousingrcr04.pdf.

⁴² Galvez, Martha M. What Do We Know About Housing Choice Voucher Pro/gram Location Outcomes? A Review of Recent Literature. What Works Collaborative, 2010. www.urban.org/sites/default/files/publication/29176/412218-What-Do-We-Know-About-Housing-Choice-Voucher-Program-Location-Outcomes-PDF.

Duval County contains a total of 29,762 publicly supported housing units, while the larger Jacksonville MSA contains 34,118 such units (see Table 16). Note that all Duval County units are by default included in the count of units within the Jacksonville MSA, meaning that Duval County units account for 87.2% of the MSA's publicly supported housing units. Only 4,356 publicly supported housing units exist in the Jacksonville MSA outside of Duval County. In Duval County, LIHTC units make up 45.8% of all publicly supported housing units, followed by Housing Choice Voucher program units and Section 8 units each at 22.3%, public housing units at 7.8%, and other multifamily units at 1.9%.

Both public housing and public housing scattered sites are largely concentrated in Jacksonville's urban core, with a few scattered throughout the wider central area of the city. Both types of sites are noticeably clustered within minority-concentrated and R/ECAP census tracts. Section 8 sites are somewhat less clustered but are located mostly in the central eastern part of the city, with several sites clustered on Jacksonville Beach (see Figure 55).

FIGURE 55: PUBLICLY SUPPORTED HOUSING AND RACE/ETHNICITY



- City of Jacksonville
- Atlantic Beach
- Baldwin
- Jacksonville Beach
- Neptune Beach
- Duval County
- Florida
- Georgia
- Parks
- Water
- Racially/Ethnically Concentrated Area of Poverty (R/ECAP)

Number of HCVs in Tract

- 0 - 36 73 - 108 145 - 181
- 37 - 72 109 - 144

Public Housing Assistance

- Public Housing (excluding scattered sites)
- Public Housing Scattered Sites
- Project-Based Section 8

Race + Ethnicity

1 Dot = 50 People

- White, Non-Hispanic
- Black or African American, Non-Hispanic
- Hispanic (of any race)
- Asian or Pacific Islander, Non-Hispanic
- Multiple Races, Non-Hispanic
- Native American, Non-Hispanic
- Other Race, Non-Hispanic

Demographics

- i. **Describe the demographics of the PHA's assisted households and, to the extent available, waitlisted households in the PHA's programs including public housing and HCV.**

In Duval County, Black residents account for 84.0% of both public housing residents and HCV program participants, 55.0% of Section 8 users, and 54.0% of other publicly supported multifamily housing residents. White residents account for 58.6% of Duval County households, 10.0% of HCV program participants, 26.0% of Section 8 users, and 32.0% of other multifamily housing residents. Hispanic residents account for 7.6% of all Duval County households, 6.0% of public housing residents, 5.0% of HCV program participants, 11.0% of Section 8 users, and 8.0% of other publicly supported multifamily housing residents.

- ii. **Describe how the PHA assisted household demographics compare to the population of the service area generally, and the population of persons who meet the PHA's income eligibility requirements in the service area and region.**

As shown in Table 17, participation in publicly supported housing is uneven across racial and ethnic groups. Black households account for 27.7% of all households in Duval County, but 84.0% of both public housing residents and HCV program participants, 55.0% of Section 8 users, and 54.0% of other publicly supported multifamily housing residents. White households account for 58.6% of Duval County households, but only 9.0% of public housing residents, 10.0% of HCV program participants, 26.0% of Section 8 users, and 32.0% of other multifamily housing residents. Hispanic households are represented more proportionally, comprising 7.6% of all Duval County households, 6.0% of public housing residents, 5.0% of HCV program participants, 11.0% of Section 8 users, and 8.0% of other publicly supported multifamily housing residents.

This pattern continues when examining income patterns which impact eligibility for publicly supported housing programs. Black households are overrepresented in the lower income categories, while white households are underrepresented, and Hispanic households are represented about proportionally. Black households account for 45.6% of households making 30% or less of the Area Median Income, despite accounting for only 27.7% of all area households. Conversely, white households account for 58.6% of area households but only 35.5% of households below 30% AMI. Hispanic households account for 7.6% of all households and 8.4% of households earning below 30% AMI. In all other categories below 100% AMI, white and Asian households are underrepresented and Black and Hispanic households are overrepresented.

TABLE 17: PUBLICLY SUPPORTED HOUSING RESIDENTS BY RACE / ETHNICITY

Housing Type	RACE / ETHNICITY									
	White		Black		Hispanic		Native American		Asian/Pacific Islander	
	#	%	#	%	#	%	#	%	#	%
DUVAL COUNTY										
Public Housing	208	9.0%	1,944	84.0%	139	6.0%	0	0.0%	23	1.0%
Project-Based Section 8	1,719	26.0%	3,637	55.0%	727	11.0%	0	0.0%	198	3.0%
Other Multifamily	189	32.0%	316	54.0%	46	8.0%	1	0.0%	2	0.0%
HCV Program	740	10.0%	6,219	84.0%	370	5.0%	0	0.0%	0	0.0%
0-30% AMI	16,270	35.5%	20,930	45.6%	3,875	8.4%	155	0.3%	1,345	2.9%
0-50% AMI	35,685	41.5%	36,055	42.0%	7,655	8.9%	250	0.3%	2,295	2.7%
0-80% AMI	69,240	46.4%	57,275	38.4%	11,805	7.9%	329	0.2%	4,390	2.9%
TOTAL HOUSEHOLDS	207,790	58.6%	98,160	27.7%	27,000	7.6%	680	0.2%	13,845	3.9%
JACKSONVILLE MSA										
Public Housing	277	11.3%	2,011	82.1%	140	5.7%	0	0.0%	23	0.9%
Project-Based Section 8	1,974	27.6%	316	53.8%	777	10.9%	5	0.1%	201	2.8%
Other Multifamily	189	32.5%	488	54.4%	46	7.9%	1	0.2%	2	0.3%
HCV Program	945	12.0%	6,450	81.7%	422	5.3%	1	0.0%	6	0.1%
0-30% AMI	27,460	44.0%	22,995	36.9%	4,900	7.9%	249	0.4%	1,625	2.6%
0-50% AMI	60,285	50.6%	39,884	33.5%	9,784	8.2%	344	0.3%	2,820	2.4%

Housing Type	RACE / ETHNICITY									
	White		Black		Hispanic		Native American		Asian/Pacific Islander	
	#	%	#	%	#	%	#	%	#	%
0-80% AMI	117,585	55.4%	63,759	30.1%	17,303	8.2%	423	0.2%	4,915	2.3%
TOTAL HOUSEHOLDS	374,965	67.7%	111,970	20.2%	38,385	6.9%	1,250	0.2%	17,625	3.2%

Source: 2015-2019 CHAS, Tables 1 and 9; 2021 APSH.

NOTE: Data presented are number of households, not individuals.

Location and Occupancy

- i. **Describe where the PHA's developments, including project-based voucher developments, HCV-assisted households, and other properties owned by the PHA are located in relation to previously discussed segregated areas and R/ECAPs. Include in the description an identification of the developments that serve families with children, elderly persons, or persons with disabilities. Do other PHAs operate public housing or HCVs in the program participants' service area and if so, how do these programs overlap with the program participants' inventory in relation to previously discussed segregated areas and R/ECAPs?**

Most categories of publicly supported housing in the region are concentrated in areas of central Jacksonville that are segregated, R/ECAPs, and lack access to opportunities. This is especially pronounced for Public Housing scattered sites. Approximately 45.6% (108 out of 237) of scattered sites are located in R/ECAPs. For Project-Based Section 8 and Public Housing excluding scattered sites, this concentration is less pronounced, but approximately 1/4 of these properties are still located in R/ECAP tracts. In comparison to all other publicly supported housing categories, residents living in HCV-supported housing are the most dispersed, with about one in six (17.6%) of HCV units located in R/ECAPs.

Project-based Section 8 developments are more geographically dispersed than other public housing but still tend to be located in lower-income census tracts. Most Project Based Voucher multifamily units are located in central Jacksonville on either side of the St. John's River. These include the Brentwood Lakes Apartments, the Cathedral Townhouse Apartments, the Caroline Arms apartments, the Oak Hammock apartments, and the Senior Citizen Village, which specifically serves elderly and disabled Section 8 voucher holders with 1 and 2-bed units. All other developments have 2, 3, and sometimes 4-bed units available and are therefore suitable for families with children.

About 62.5% of RAD-Project Based Voucher units are located just north of downtown Jacksonville, while the remaining 37.5% are in Jacksonville Beach and Atlantic Beach.

Jacksonville Housing currently lists wait times for public housing units as follows:

- 1-2 Bedrooms: 4-60 months from the date of application
- 3 Bedrooms: 12-18 months from date of application
- 4-5 Bedrooms: 4-12 months from the date of application
- Studio apartments in high-rises: 12-18 months from the date of application

The Housing Authority also notes preference given to working families, victims of domestic violence, veterans, and applicants displaced by government activity.

- ii. Describe any differences between the demographics of residents of the PHA's public housing and HCV-assisted households who live inside R/ECAPs as compared to those who live outside R/ECAPs.**

Data is not available on the demographics of public housing and HCV-assisted housing inside and outside of R/ECAPs.

- iii. Do any of the PHA's developments, including RAD-converted developments, have a significantly different demographic composition, in terms of protected class, than other developments? Describe how these developments differ.**

Black, non-Hispanic residents make up 71% to 94% of residents in Jacksonville Housing's public housing properties. Centennial Townhouse, the Oaks at Durkeeville, and Brentwood Lake have the greatest shares of Black, non-Hispanic residents (92% to 94%). Southwind Villas; Forest West and East, Anders and Scattered Sites; and Carrington Place Apartments have the lowest shares of Black, non-Hispanic residents (71% to 72%). Hispanic residents make up 9% to 12% of the population at these sites. Data on demographic composition is not available for other assisted housing developments.⁴³

- iv. Compare the demographics of the PHA's public housing developments, including RAD-converted developments, to the demographic composition of the areas in which they are located. Describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity). Describe any differences in developments that primarily serve families with children, elderly persons, and persons with disabilities.**

Black residents make up the vast majority of public housing residents and Housing Choice Voucher holders (84.0%), while accounting for slightly more than half of Project Based Section 8 residents (55.0%) and other publicly supported multifamily housing residents (54.0%; see Table 17). However, Black residents are overrepresented in all categories, as they make up just 27.7% of all households in Jacksonville. White residents are most represented in Project Based Section 8 and other multifamily housing, where they make up 26% and 32% of residents, respectively. Hispanic residents are also most represented in Project Based Section 8 and other

⁴³ U.S. Department of Housing and Urban Development. Assisted Housing: National and Local. Retrieved from: <https://www.huduser.gov/portal/datasets/assthsg.html>

multifamily housing, comprising 11% and 8% of residents in these developments, respectively. Public housing developments are notably clustered within Jacksonville's majority-Black census tracts and R/ECAP census tracts, while some Project Based Section 8 developments exist in majority-white census tracts, as discussed in the previous section.

Occupancy rates for publicly supported housing remain extremely high across all categories (see Table 18). Jacksonville Housing currently reports that 100% of available Housing Choice Vouchers are currently in use, while occupancy rates of other categories range from 92-99%. In total, there are only 594 unoccupied publicly supported housing units in Duval County, 529 of which are Project Based Section 8 units. In contrast, as shown in Table 17 there are 81,940 households in Duval County that earn less than 50% AMI and may require housing assistance.

TABLE 18: SELECT PUBLICLY SUPPORTED HOUSING UNIT OCCUPANCY IN DUVAL COUNTY

UNIT TYPE	Total Units	% Occupied	Units Available
Public Housing	2,314	99.0%	23
Housing Choice Vouchers	7,403	100%	0
Mod Rehab	397	96.0%	16
Project Based Section 8	6,612	92.0%	529
Section 236/BMIR	21	0%	21
202/PRAC	99	98.0%	2
811/PRAC	65	96.0%	3
Total Units	16,911	97.0%	594

Source: HUD, *Picture of Subsidized Households* (2021)

Fair Housing Analysis of Rental Housing

i. For the service area and region:

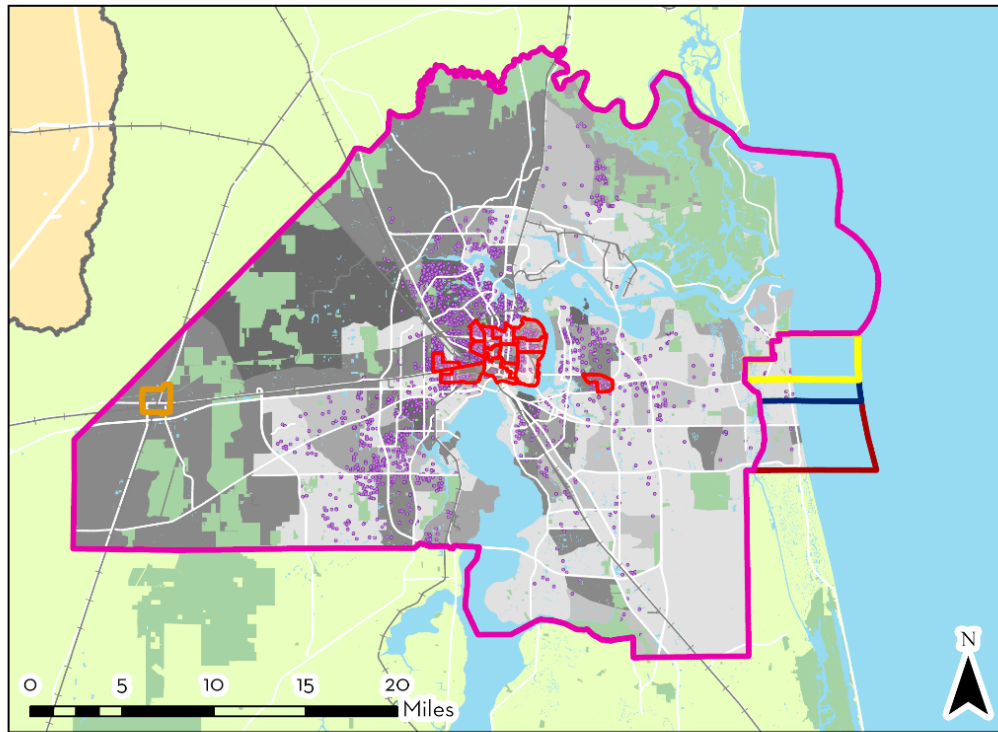
- **Describe the location of rental housing;**
- **Describe the location of affordable rental housing;**
- **Compare the location of affordable rental housing to the location of HCVs.**

Informed by the analyses conducted above regarding Segregation/Integration and Disparities in Access to Opportunity, identify areas in the service area and region that would promote integration and provide access to opportunity for HCV-assisted households with different protected characteristics that:

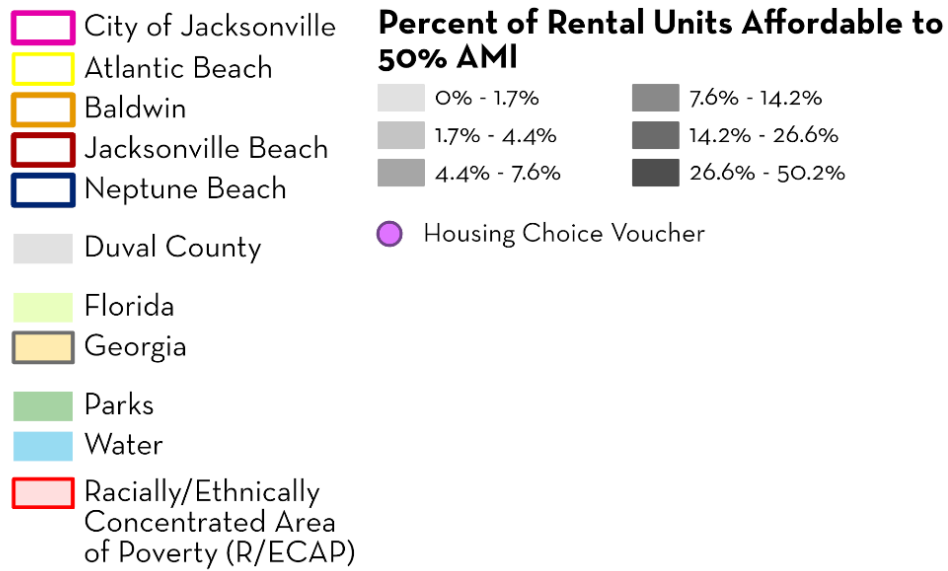
- **Lack rental housing or affordable rental housing;**
- **Have affordable rental housing where vouchers are not being used.**

Rental housing in the majority of Jacksonville remains unaffordable to families earning below 50% AMI. In the majority of Jacksonville's census tracts less than 15% of rental properties are affordable to families earning below 50% AMI (see Figure 56). Tracts that are more affordable are located in the urban core and west of the St. John's River, but there are no tracts where more than roughly one quarter of rental housing is available to families earning under 50% AMI. Noticeably, Housing Choice Voucher users are also clustered in these more affordable areas, although to a lesser degree than other publicly supported housing residents. Even within R/ECAP tracts, a very low share of housing stock is affordable to low-income households. In general, rental housing is slightly more affordable west of the St. John's River.

FIGURE 56: AFFORDABLE RENTAL HOUSING IN JACKSONVILLE



Sources: 2016-2020 ACS 5-Year Estimate Data; 2020 Census Redistricting Data; 2014-2018 CHAS Data



Other Publicly Supported Housing Programs

- i. **Demographics: Describe the racial/ethnic groups more likely to be residing in other categories of publicly supported housing (project-based section 8 and Other Multifamily assisted housing) in the service area.**

White households in Duval County are nearly three times more likely to reside in Project-Based Section 8 (26.0%) and Other Multifamily assisted housing (32.0%) compared to Public Housing (9.0%) and the HCV program (10.0%) (see Table 17). Shares of residents by program are similar for white households in the Jacksonville MSA. Latino households are also more likely to reside in Project-Based Section 8 (11.0%) and Other Multifamily assisted housing (8.0%), though the difference in percentage points between these categories and Public Housing (5.7%) and HCV (5.3%) is less pronounced. Additionally, Asian/Pacific Islander households in the region almost exclusively occupied Project-Based Section 8 (3.0%) in comparison to all other categories of publicly supported housing.

Location and Occupancy:

Regarding the location of publicly supported housing options, answer the following questions:

- **Describe the geographic location of other publicly supported housing (Project-based Section 8, Other Multifamily) by program category in the service area and region in relation to previously discussed segregated areas and R/ECAPS;**

There are two clusters of Project-Based Section 8 housing in the region: one is located in central Jacksonville with approximately 51 properties in many of the previously discussed segregated areas and/or R/ECAPs; and one in The Beaches, with approximately 87 properties— 73 of which are located within Jacksonville Beach. Other Multifamily assisted housing in the region is slightly more dispersed, with locations remaining near the central Jacksonville region but less clustered. Unlike Project-Based Section 8, there are no Other Multifamily properties near The Beaches region. There are also a smaller number of properties in this category overall.

- **Describe patterns of concentration of publicly supported housing program categories in areas previously identified as segregated, integrated, in R/ECAPs or with disparities in access to opportunity in the service area and region;**

Most categories of publicly supported housing in the region are concentrated in areas of central Jacksonville that are segregated, R/ECAPs, and lack access to opportunities. This is especially

pronounced for Public Housing scattered sites. Approximately 45.6% (108 out of 237) of scattered sites are located in R/ECAPs. For Project-Based Section 8 and Public Housing excluding scattered sites, this concentration is less pronounced, but approximately 1/4 of these properties are still located in R/ECAP tracts. In comparison to all other publicly supported housing categories, residents living in HCV-supported housing are the most dispersed, with about one in six (17.6%) of HCV units located in R/ECAPs.

- **Are there publicly supported housing options available in areas with greater access to opportunity in the service area and region?**

As previously discussed, there is a cluster of Project-Based Section 8 located in The Beaches, which exhibits lower rates of poverty and households experiencing housing problems than the areas in central Jacksonville. In addition, while HCV-supported properties are concentrated in central Jacksonville, there are also many that are scattered throughout the Westside and Arlington neighborhoods.

- **Informed by community participation, local data and/or local knowledge, describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in the service area and region in relation to previously discussed segregated areas or R/ECAPs;**

Based on conversations with community members and stakeholders, most of the publicly supported housing options for families with children, elderly persons, and persons with disabilities are located either within or near the previously discussed segregated areas and R/ECAPs. The overall shortage of affordable housing options in Jacksonville has been discussed, but this shortage is even more pronounced for housing meant to serve these populations. Anecdotal evidence shows that households with over 5 members face difficulties finding housing in areas of opportunity due to negative perceptions of larger families with children. The numbers of HUD-assisted accessible housing through Section 202 and 811 are scarce in comparison to demand, but there are a couple of properties located in the Westside and Southside that are more integrated. Other factors such as locations of existing support networks may also impact the mobility of where families with children, elderly persons, and persons with disabilities can reside.

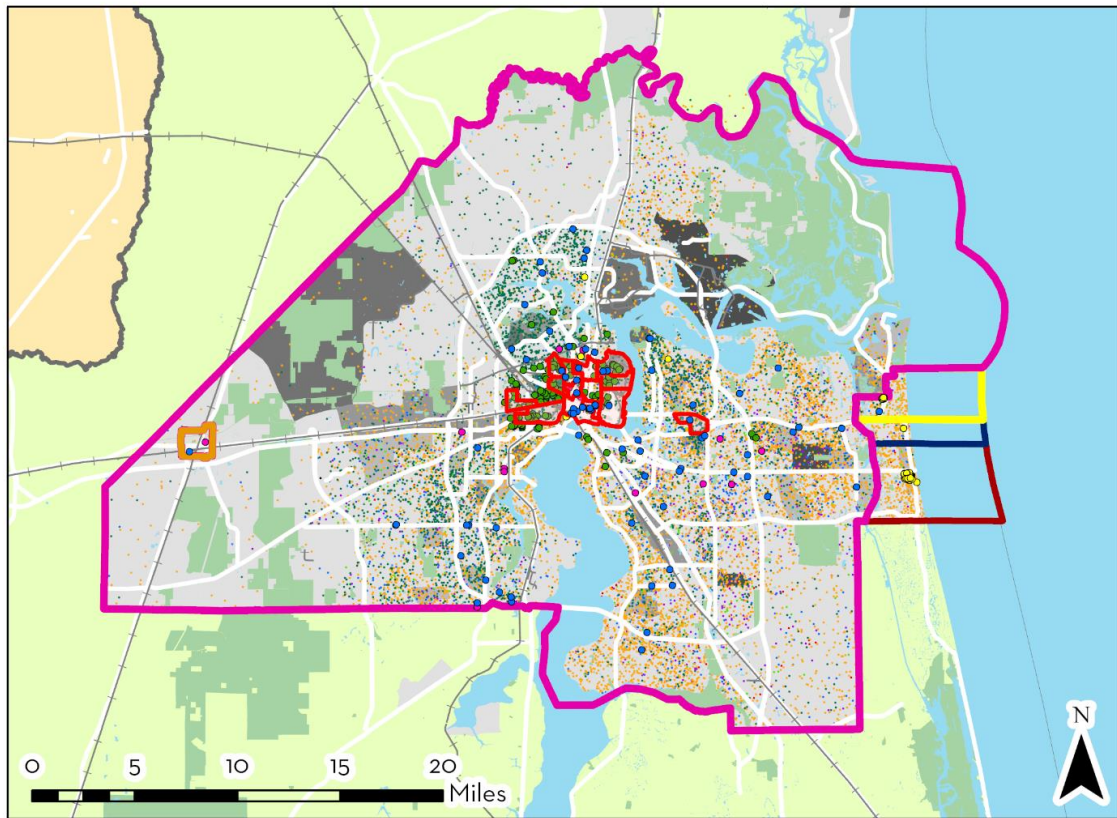
- **Provide additional relevant information, if any, about occupancy, by protected class, in other categories of publicly supported housing, including LIHTC, Project-based Section 8, and Other Multifamily in the service area;**

As shown in Table 15, persons with disabilities are least likely to reside in Project-Based Section 8 properties (11%) compared to other categories of publicly supported housing. Data regarding occupancy by protected class for LIHTC properties in the area was not available.

- **Describe the location of LIHTC developments in relation to previously discussed areas of segregation and integration, and R/ECAPs, and whether they are located in high opportunity areas for the service area and region. Are the PHA's voucher holders able to access a wide variety of LIHTC developments in integrated, higher opportunity areas?**

While LIHTC properties are more evenly dispersed across Jacksonville compared to other publicly supported housing options, approximately 25% of LIHTC properties are still located in R/ECAP tracts (see Figure 57). There are LIHTC properties in more integrated higher opportunity areas such as the Southside and Arlington, but it is unclear how long the waiting lists for these properties are.

FIGURE 57: PUBLICLY SUPPORTED HOUSING INCLUDING LIHTC PROPERTIES



Sources: 2016-2020 5-Year ACS Table S1701; 2022 Jacksonville Housing

 City of Jacksonville

 Atlantic Beach

 Baldwin

 Jacksonville Beach

 Neptune Beach

 Duval County

 Florida

 Georgia

 Parks

 Water

 Racially/Ethnically
Concentrated
Area of Poverty
(R/ECAP)

Number of HCVs in Tract

 0 - 36

 73 - 108

 145 - 181

 37 - 72

 109 - 144

Public Housing Assistance

● Public Housing (excluding scattered sites)

● Public Housing Scattered Sites

● Project-Based Section 8

● LIHTC

Disparities in Access to Opportunity: Describe any disparities in access to opportunity in the service area and region for residents of publicly supported housing, including within different program categories (project-based Section 8, Other Multifamily, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.

Most categories of publicly supported housing in the region are concentrated in areas of central Jacksonville that are segregated, R/ECAPs, and lack access to opportunities. This is especially pronounced for Public Housing scattered sites. Approximately 45.6% (108 out of 237) of scattered sites are located in R/ECAPs. For Project-Based Section 8 and Public Housing excluding scattered sites, this concentration is less pronounced, but approximately 1/4 of these properties are still located in R/ECAP tracts. In comparison to all other publicly supported housing categories, residents living in HCV-supported housing are the most dispersed, with about one in six (17.6%) of HCV units located in R/ECAPs.

As detailed in previous chapters, residents living in R/ECAP census tracts tend to have lower levels of access to opportunity, including employment and labor market engagement, proficient schools, and healthy environments. Disparities in access to opportunity are discussed in Section V(B) of this report.

ADDITIONAL INFORMATION

- i. **Provide additional relevant information, if any, about publicly supported housing in the service area and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.**
- ii. **The PHA may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or mobility programs.**

CONTRIBUTING FACTORS OF PUBLICLY SUPPORTED HOUSING

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

- i. Admissions and occupancy policies and procedures, including preferences in publicly supported housing.
- ii. Community opposition.
- iii. Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking.
- iv. Displacement of residents due to economic pressures.
- v. Lack of access to opportunity due to high housing costs.
- vi. Lack of meaningful language access.
- vii. Lack of local or regional cooperation.
- viii. Lack of public and/or private investment in specific neighborhoods, including services or amenities.
- ix. Land use and zoning laws.
- x. Loss of affordable housing.
- xi. Occupancy codes and restrictions.
- xii. Policies related to payment standards, FMR, and rent subsidies.
- xiii. Quality of affordable housing information programs.
- xiv. Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs.
- xv. Source of income discrimination.
- xvi. Other.

As previously discussed, the majority of Jacksonville's publicly supported housing is located within the city's urban core in census tracts that are predominantly low-income. The exception to this is Housing Choice Voucher holders, whose residences are more dispersed, with 17.6% of all HCV holders living in R/ECAP census tracts. Project-Based Section 8 residents also have slightly more choice, with some RAD-PBV units located on Jacksonville Beach. In all cases, publicly supported housing residents are restricted in their housing choice to some degree: residents of programs tied to specific locations, such as Public Housing and Project Based Section 8 residents, must choose from pre-existing program developments, while Housing Choice Voucher users must find landlords willing to accept vouchers.

When interviewed, residents and stakeholders in Jacksonville consistently listed community resistance to expansion of publicly supported housing as a primary reason for the clustering of publicly supported housing residents in lower income census tracts with fewer amenities. Stakeholders noted that source-of-income discrimination, in which landlords refuse to rent to tenants who list vouchers as a source of income, is a major factor preventing voucher holders from moving to neighborhoods with more amenities and resources. Residents of many higher-opportunity neighborhoods have tended to oppose to new construction of public housing and Project-Based Voucher properties, contributing to the clustering of publicly supported housing in neighborhoods with fewer resources and lower levels of access to opportunity.

Other factors referenced by stakeholders in publicly supported housing issues and geographic clustering include the following:

- Not enough housing accessible to seniors and people with disabilities (only one of Jacksonville's publicly supported developments caters to such residents);
- Community opposition to the development of public and assisted housing in higher-opportunity neighborhoods, and to landlords in these neighborhoods accepting Housing Choice Vouchers;
- High rental housing costs across Jacksonville, as depicted in Figure 56;
- Lack of widespread transit options, which limits housing choice: low-income families and individuals receiving housing assistance are less likely than other residents to have access to a vehicle and may be restricted to areas that provide access to their place(s) of employment;
- Lack of public and private investment in low-income neighborhoods;
- Lack of funding and assistance to build environmental resiliency in low-income neighborhoods, which tend to be more flood prone; and

- Overly restrictive qualification criteria for housing assistance programs, which often results in the disqualification of participating families and individuals when income from employment changes even slightly.

E. FAIR HOUSING ENFORCEMENT, OUTREACH CAPACITY, AND RESOURCES ANALYSIS

- xvii. List and summarize any of the following involving the program participant(s) submitting the AFH that have not been resolved: a charge or letter of finding from HUD concerning a violation of a civil rights-related law; a cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law; any voluntary compliance agreements, conciliation agreements, or settlement agreements entered into with HUD or the Department of Justice; a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law; a claim under the False Claims Act related to fair housing, nondiscrimination or civil rights generally, including an alleged failure to affirmatively further fair housing.**

Public records requests and searches to HUD's Office of Fair Housing and Equal Opportunity; the Department of Justice Civil Rights Division; the Florida Commission on Human Relations; the Jacksonville Human Rights Commission; Jacksonville Area Legal Aid; and state and federal court electronic records revealed one fair housing discrimination case involving Jacksonville Housing Authority that was still unresolved/pending as of August 17, 2022. Other recent fair housing complaints and cases involving JHA or private housing providers in Jacksonville are discussed in the "Additional Information" section below.

- [May v. Jacksonville Housing Authority, 3:21-cv-01170 \(M.D. FL.\)](#) Plaintiff Sheldon May, a veteran with physical disabilities that cause difficulty walking and climbing stairs, is a resident of Centennial Towers in Jacksonville—a senior housing property owned by Jacksonville Housing Authority (JHA) that in 2020 converted to a project-based voucher program property under HUD’s Rental Assistance Demonstration (RAD) Program and subsequently underwent renovations. JHA notified residents that they would be relocated during the property’s renovation period and could return to their units following renovations. Plaintiff was relocated to an extended stay hotel and requested that rather than being assigned back to his previous tenth floor apartment that he be housed in a ground floor unit as an accommodation for his disabilities. JHA denied his reasonable accommodation request stating all the apartments at Centennial have elevator access, there are no ground floor units at Centennial, and Mr. May could not transfer to another property and keep his housing assistance benefit. On November 23, 2021, plaintiff filed a complaint in federal district court against JHA for injunctive and compensatory relief arguing that because the elevators at Centennial Towers are often malfunctioning and inoperable leaving him stranded on the tenth floor or unable to return to his apartment from the ground floor, the denial of his reasonable accommodation request violated the FHA.

On December 22, 2021, the court denied Mr. May’s motion for preliminary injunction requesting the court require JHA to transfer plaintiff to a first-floor unit owned, managed, or operated by JHA, finding plaintiff had not met the burden of proof for preliminary relief because JHA had recently replaced and put into operation one elevator and would soon replace a second elevator. Plaintiff’s attorney with Jacksonville Area Legal Aid then requested permission to withdraw as representative counsel citing irreconcilable differences. As of August 18, 2022, the case was still pending but a recommendation from the magistrate judge had been filed recommending the court dismiss the case for failure of plaintiff to prosecute the case and follow the court’s directives to retain new representation and move the case along.

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

Fair housing laws may be enacted and enforced at the local, state, and federal level. Florida has adopted a parallel version of the Federal Fair Housing Act—Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, 42 U.S.C. §§ 3601 et seq. (the “FHA” or “FHAA”)—codified as the Florida Fair Housing Act (FLA. STAT. § 760.20 et seq.). The Florida Fair Housing Act (“FFHA”) was passed in 1983 and amended in 1989, with various provisions updated and amended since to keep pace with Florida’s fair housing goals and maintain “substantial equivalence” with the federal FHA. Both the federal FHA and the FFHA

prohibit discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on sex, race, color, disability, religion, national origin, or familial status. These laws also protect persons from retaliation for exercising fair housing rights. Although federal law sets the minimum standards for fair housing enforcement, it does not preclude local and state laws from expanding protected classes and fair housing rights. The FFHA does not extend protections to any other class of persons outside of those seven protected classes under the federal FHA. The FFHA explicitly provides that it is unlawful to discriminate in land use decisions or in the permitting of development based on the source of financing of a development (FLA. STAT. § 760.26).

The FFHA permits local governments of the state to adopt fair housing ordinances consistent with the state act and to investigate and enforce alleged violations in lieu of state enforcement. The city of Jacksonville has adopted a local fair housing ordinance (ORDINANCE CODE OF THE CITY OF JACKSONVILLE, CH. 408 *et seq.*) modeled after federal civil rights and fair housing laws with parallel provisions regarding rights, procedures, remedies, and judicial review and enforcement. In addition to race, color, religion, national origin, sex, handicap, and familial status, Jacksonville's Fair Housing Ordinance also prohibits discrimination based on a person's sexual orientation, gender identity, or marital status. The Jacksonville Human Rights Commission administers and enforces the provisions of the Jacksonville Fair Housing Ordinance.

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

An individual in Jacksonville who believes he/she has been the victim of an illegal housing practice has multiple channels under federal, state, and local fair housing laws to seek redress. Under federal fair housing laws, an individual may file a complaint with the appropriate HUD Regional Office of Fair Housing and Equal Opportunity (FHEO) within one year of when the discriminatory practice occurred. Region IV of the FHEO receives complaints by households regarding alleged violations of the Fair Housing Act for cities and counties throughout Florida (as well as Alabama, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee). The Jacksonville field office serves the 57 counties of north Florida and the Miami office serves ten counties of south Florida. Where a state or local fair housing act or ordinance has been certified by HUD as "substantially equivalent" to the substantive rights, procedures, remedies, and judicial review processes of the federal Fair Housing Act, HUD policy favors referring complaints of housing discrimination to the state or local fair housing enforcement agency for investigation, conciliation, and enforcement activities.

FHAP ENFORCEMENT

“Substantially equivalent” enforcement agencies may qualify for HUD-subsidized funding through the Fair Housing Assistance Program (FHAP). The Florida Commission on Human Relations, a certified FHAP agency, has the authority and responsibility to administer and enforce the FFHA, including to receive, initiate, investigate, seek to conciliate, hold hearings on, and act upon complaints alleging a discriminatory practice; issue subpoenas; conduct informal methods of conference, conciliation, and persuasion; initiate an administrative proceeding before an administrative law judge or institute a civil action in an appropriate court if it is unable to obtain voluntary compliance with the FFHA.

Recent state court decisions interpreting the FFHA held that a complainant must first exhaust his or her administrative remedies with the Florida Commission on Human Relations before pursuing a civil action, which is inconsistent with the federal Fair Housing Act inasmuch as the FHA permits an aggrieved party to pursue remedies *either* through the administrative complaint process or through a private action in court without first exhausting administrative remedies. This disparity put into jeopardy the FFHA’s substantial equivalence standing and the Commission’s eligibility under the FHAP program. To correct this, in 2020, the state legislature amended the FFHA (HB 175) to make explicit that the Commission and aggrieved complainants do not have to first exhaust administrative remedies before filing an action in civil court. Remedies available under the FFHA include injunctive relief, fines, and actual and punitive damages. A court also may award reasonable attorney fees and costs.

Where a city or county government has adopted a local fair housing ordinance, state law requires the Commission to refer discrimination complaints to the local enforcement authority and take no further action if the local agency commences proceedings in the matter. HUD has certified the Jacksonville Fair Housing Ordinance as substantially equivalent to the FHA and designated the **Jacksonville Human Rights Commission (JHRC)** as a local FHAP agency eligible for fair housing enforcement funding. Because Jacksonville has a local fair housing ordinance with rights and remedies substantially equivalent to those provided in the FFHA, the state Commission also will refer any complaints it receives involving housing discrimination claims in the jurisdiction of Jacksonville to the JHRC for investigation and enforcement. However, because JHRC is a city agency, it would be a conflict of interest for it to investigate claims against Jacksonville Housing Authority. For any complaint JHRC receives against a JHA property, jurisdiction would be waived and the matter referred back to the local HUD FHEO field office.

The JHRC works to combat discrimination in housing (and in employment and public accommodations) and to foster cultural, religious, ethnic, and racial understanding in the

community. The Jacksonville Municipal Code grants the JHRC jurisdiction to investigate fair housing complaints involving properties in Duval County. The JHRC has seven full time employees and a proposed budget for 2022-2023 of approximately \$786,000. Based on the population of Jacksonville/Duval County, HUD requires JHRC to investigate at least 20 fair housing complaints per fiscal year. JHRC has two fair housing investigators, which HUD considers sufficient to meet the foregoing requirement.

In addition to allocations from the City's general fund, as a certified FHAP agency and per its Cooperative Agreement/MOU (Memorandum of Understanding) with HUD, the JHRC is eligible to apply for administrative funds, complaint processing funds, and training funds to support its fair housing education and enforcement efforts.

Administrative costs (AC) funds reimburse FHAPs for expenses incurred in processing fair housing complaints, such as salaries, benefits, and pension costs. The amount of AC funds and training funds HUD pays is based on the number of full-time employees (FTEs) or FTE equivalents supporting fair housing activities. Complaint processing (CP) funds reimburse JHRC for its work investigating fair housing discrimination complaints in Duval County. The amount of CP funds JHRC receives varies, depending on the number of fair housing investigations it closes each fiscal year.

The City's Community Development Block Grant (CDBG) funds received from HUD each fiscal year, which are administered by the City's Neighborhoods Department, also is a source of indirect funding for JHRC. JHRC primarily uses CDBG funding to sponsor a fair housing symposium during April, Fair Housing Month, and to engage in other fair housing education/outreach activities throughout the year.

FHIP Grantee—Jacksonville Area Legal Aid

In addition to local and state FHAP agencies, under HUD's Fair Housing Initiatives Program (FHIP), HUD awards grant money to local fair housing advocacy organizations who assist persons believed to have been harmed by discriminatory housing practices; to help people identify government agencies that handle complaints of housing discrimination; to conduct preliminary investigation of claims; to carry out testing and enforcement activities to prevent or eliminate discriminatory housing practices; and to educate the public and housing providers about equal opportunity in housing and compliance with the fair housing laws. **Jacksonville Area Legal Aid (JALA)**, a nonprofit law firm, established a fair housing unit to advocate on behalf of fair housing victims and educate the community on fair housing rights and responsibilities. FHIP grants are the main source of funding for JALA's fair housing enforcement activities, and the consistency in funding from the 3-year EOI grants and 1-year PEI grants have allowed JALA to hire dedicated staff, offer long-term continuity of services, and maintain strong

collaboration and networking with other advocacy organizations. The fair housing unit currently includes two attorneys, a paralegal, and a testing coordinator. JALA reports that it would welcome more funding to hire additional attorneys, but has been successful with managing intake and caseloads and, because it can pull in other JALA attorneys when the fair housing unit reaches capacity, it has not turned away a meritorious case for lack of staffing or resources. Intake for fair housing cases averages 3-4 cases per week.

For FY2021, HUD announced that JALA would receive an EOI (Education and Outreach Initiatives) grant of \$125,000 and a PEI (Private Enforcement Initiatives) grant of \$371,333. EOI dollars are awarded to organizations that educate the public and housing providers about fair housing rights and responsibilities. PEI dollars are awarded to organizations that conduct intake and testing and that investigate and litigate fair housing complaints.

JALA has a three-pronged approach to combating housing discrimination: (1) educate housing consumers to recognize and report housing discrimination; (2) conduct ongoing research, testing, and monitoring efforts to determine the nature and extent of housing discrimination being practiced in the community; and (3) advocate on behalf of individual clients to mediate or litigate claims in the administrative or state or federal court process.

JALA reports that its primary case type, approximately 70% of intake, is a claim based on disability discrimination and reasonable accommodation. Clients often identify the condition and quality of housing as being substandard and which exacerbates their disabilities—for example, mold, rodents, no A.C. or heating, no working elevators, etc.). In JALA's experience, property management groups, owners, and employees/agents for housing providers often lack education and understanding of the FHA's accessibility guidelines and how to process reasonable accommodation requests. More education on the front end to housing providers and their employees/agents could make a meaningful difference in preventing discriminatory housing practices against persons with disabilities versus having to mediate and educate the same housing providers over and over after a fair housing violation and injury has occurred.

ADDITIONAL INFORMATION

xx. Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the service area and region;

The investigation, conciliation, reasonable/no reasonable cause findings, and charge procedures under the Florida Fair Housing Act and Jacksonville's Fair Housing Ordinance are substantially similar to HUD's administrative process, including a finding of liability with the availability of compensatory and injunctive relief for the aggrieved complainant. After HUD/FHEO, the Florida Commission on Human Relations, or the Jacksonville Human Rights Commission receives a complaint and confirms it has jurisdiction, the respective agency will

notify the alleged discriminator (respondent) and begin an investigation. During the investigation period, the FHEO or FHAP will attempt through mediation to reach conciliation between the parties. If no conciliation agreement can be reached, the investigative authority must make a finding of either “reasonable cause” to believe that a discriminatory act has occurred or that there is no reasonable cause. If the FHEO/FHAP finds “reasonable cause,” it may institute an administrative proceeding or civil action. The parties also may elect to have the claims decided in a civil action. If the FHEO/FHAP makes a “no cause” finding, the case is dismissed. (The complainant would still have the opportunity to file a complaint in civil court and pursue remedies through the judicial process.) The advantages of seeking redress through the administrative complaint process are that the FHEO/FHAP takes on the duty, time, and cost of investigating the matter on behalf of the complainant and conciliation may result in a binding settlement.

Complaints Filed with HUD

The Jacksonville field office of the FHEO maintains data reflecting the number of complaints of housing discrimination received by HUD, the status of all such complaints, and the basis/bases of all such complaints. The office responded to a request for data regarding complaints received affecting housing units in Jacksonville and Duval County for the last five-year period.

From January 1, 2017, to June 30, 2022, HUD reported the filing of 128 formal complaints alleging housing discrimination in Jacksonville/Duval County. Of those, 87 cases were referred to the state or local FHAP agency and 41 were processed by HUD. (The complete data table provided by HUD is included as an appendix to this report with the filing date, closure date, basis of complaint, issues cited, closure reason, and monetary relief provided.)

TABLE 19: BASIS / PROTECTED CLASS STATUS OF COMPLAINTS RECEIVED BY HUD

Basis	2017	2018	2019	2020	2021	2022 thru 7/30	Total
Disability	12	12	14	8	17	6	69
Race	3	6	4	6	20	2	41
Sex	5	3	1	1	3	1	14
Familial Status	2	2	1	3	2	0	10
National Origin	3	1	0	2	1	0	7
Retaliation	0	1	1	0	3	2	7
Religion	1	0	0	1	0	0	2
TOTAL NUMBER OF CASES FILED PER YEAR (which may include more than one basis of discrimination per complaint)	20	21	18	19	39	11	128

More than one basis of discrimination may be cited in a single complaint, thus why there were 150 identified bases of discrimination in the 128 complaints filed. Disability was the most often cited basis of discrimination, alleged by complainants to have occurred in approximately 54% of reported cases, followed by race in approximately 32% of cases, and sex in approximately 10% of cases. Complainants also may cite more than one discriminatory act or practice, recorded as the discriminatory *issue*. HUD reported that the complaints filed identified the following issues: discriminatory terms, conditions, privileges, or services and facilities (75 cases); failure to make a reasonable accommodation (62 cases); discriminatory acts under Section 818 (coercion, etc.) (28 cases); otherwise deny or make housing unavailable (24 cases); discriminatory refusal to rent (20 cases); discrimination in terms/conditions/privileges relating to rental (16 cases); discriminatory advertising, statements and notices (15 cases); failure to permit reasonable modification (12 cases); discriminatory financing (includes real estate transactions) (4 cases); discrimination in the terms/conditions for making loans (4 cases); discrimination in the appraising of residential real property (3 cases); discrimination in the making of loans (2 cases); false denial or representation of availability (2 cases); discriminatory refusal to negotiate for rental (1 case); using ordinances to discriminate in zoning and land use (1 case); discrimination in the selling of residential real property (1 case).

Of the 128 cases opened, 55 cases were resolved through conciliation and a settlement agreement negotiated between the parties; 45 cases were closed by the FHEO/FHAP agency for “no cause”—i.e. after a full investigation was conducted, evidence did not support reasonable cause to believe that an unlawful act had occurred; 15 cases were still open/under investigation; 10 cases were withdrawn by complainant without resolution; and 3 cases were resolved by judicial consent order. In 22 cases resolved through conciliation/settlement and one case by judicial consent order, respondents paid damages to the aggrieved party and/or into a victims’ fund in amounts ranging from \$500 to \$76,460 and totaling \$253,296. In cases resolved by settlement/conciliation, the respondents did not necessarily admit liability, but may have settled to avoid further expense, time, and the uncertainty of litigation.

Five of the 41 complaints processed by HUD were complaints against **Jacksonville Housing Authority**. All five cases against JHA have been closed—three cases through conciliation/settlement and two cases after investigation and a no cause determination. More than one basis of discrimination may be reported per complaint. In these cases, disability was the most reported basis, allegedly occurring in 4 out of 5 cases, followed by sex discrimination in 2 out of 5 cases, and race discrimination in 1 out of 5 cases.

TABLE 20: COMPLAINTS AGAINST JACKSONVILLE HOUSING AUTHORITY

Filing Date	Closure Date	Case Status/ Closure Reason	Basis	Issues	Compensation or Victim’s Fund Amount
06/30/17	04/26/18	Conciliation/ settlement successful	Sex; Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	\$76,460
03/09/18	05/21/18	No cause determination	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	
06/25/18	02/28/19	No cause determination	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	
10/09/18	06/03/19	Conciliation/ settlement successful	Race; Sex	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	
05/29/19	09/03/19	Conciliation/ settlement successful	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	\$2,000

In the disability and sex discrimination case resulting in a \$76,460 settlement amount, HUD entered a Voluntary Compliance Agreement with JHA to resolve allegations that a female resident of a public housing unit at Carrington Place Apartments in Jacksonville was sexually harassed on multiple occasions by a JHA employee, including being threatened with eviction if she did not comply with the JHA agent's demands for sex. JHA (and its insurance company) paid the Complainant \$75,000, and \$1,460 was allocated to the JHA Operations Compliance Department to satisfy the Complainant's outstanding debt for back rent. The conciliation agreement also required JHA to reopen its wait list for Section 8 Housing Choice Vouchers and allow Complainant an opportunity to apply for a top spot on the wait list at a property of her choosing. As for relief in the public interest, JHA was required to adopt a nondiscrimination policy and a formal complaint process for addressing sexual harassment allegations and to provide compulsory training for all employees and agents regarding the nondiscrimination policy.

Complaints filed with the Jacksonville Human Rights Commission

The JHRC also responded to a request for information regarding fair housing complaints it had received. The Commission provided data for open investigations post-6/30/22 (the end of HUD's case processing period for fiscal year 2021-2022) for 14 cases. Eleven of the cases are duplicates of data provided above by HUD/FHEO (indicated with an asterisk) with updated case status information by the JHRC as of August 10, 2022:

TABLE 21: COMPLAINTS RECEIVED BY JHRC

Filing Date	Closure Date	Case Status/ Closure Reason	Basis	Issues	Compensation or Victim's Fund Amount
*11/20/20	open	Cause determination; administrative hearing	Disability	Failure to accommodate; discriminatory terms and conditions	
*7/27/21	6/30/22	No cause determination	Disability; sexual orientation	Failure to accommodate; discriminatory terms and conditions; discriminatory statements	
*9/9/21	6/10/22	Conciliation/ successful settlement – closed	Disability; retaliation	Failure to accommodate; discriminatory terms and conditions; retaliation	

*1/5/22		Open investigation	Disability	Failure to accommodate; discriminatory terms and conditions	
*5/19/22		Open investigation	Race	Discriminatory statements, notices and advertising; discriminatory terms and conditions; housing denied or made unavailable	
*5/24/22	7/13/22	Conciliation/ successful Settlement	Disability	Failure or refusal to accommodate; discriminatory terms and conditions; housing made unavailable	
*4/14/22		Open investigation	Disability	Failure to accommodate; discriminatory terms and conditions	
*5/26/22		Open investigation	Sex	Discriminatory terms and conditions; refusal to rent; housing made unavailable	
*5/31/22		Open investigation	Disability	Failure to accommodate; discriminatory terms and conditions	
*6/6/22		Open investigation	Race	Discriminatory appraisal	
6/6/22		Open investigation	Disability	Failure to accommodate; discriminatory terms and conditions	
*6/6/22		Open investigation	Race	Discriminatory terms and conditions; housing made unavailable; retaliation	

7/22/22		Open investigation	Race; sex; retaliation	Discriminatory terms and conditions; housing made unavailable; discriminatory acts	
7/25/22		Open investigation	Race	Refusal to rent; discriminatory terms and conditions	

Fair Housing Lawsuits and Litigation

As an alternative to pursuing remedies through the administrative process, an aggrieved person may commence a civil action in an appropriate U.S. district court or state court not later than two years after the occurrence or the termination of an alleged discriminatory housing practice as long as the parties have not already entered into a conciliation agreement or, following a reasonable cause determination, an administrative hearing has not already commenced. Where an administrative action has been filed, the two-year statute of limitations is tolled during the period when the FHAP/HUD is evaluating the complaint. By pursuing judicial remedies, the plaintiff has the potential to collect punitive damages in addition to compensatory damages and injunctive relief. Fair housing lawsuits may be filed against local governments and zoning authorities and against private housing providers, mortgage lenders, or real estate brokers. The state attorney general or DOJ also may initiate a civil action on behalf of persons injured by discriminatory housing practices where the agency has reasonable cause to believe that a person or group of persons is engaged in a pattern or practice of discrimination, or the alleged discrimination raises an issue of great public interest.

Below is a summary of the nature, extent, and disposition of three significant housing discrimination lawsuits filed and/or adjudicated between January 2017 and July 2022 involving or affecting parties from Jacksonville and Duval County, and which may impact fair housing choice within the jurisdiction. The cases chosen for discussion illustrate how discrimination based on disability can show up in a variety of ways and negatively impact housing choice for persons with disabilities: failure to provide reasonable accommodations, modifications, and accessibility for persons with disabilities; failure to design and construct accessible multifamily dwellings so that persons with disabilities may use and enjoy a dwelling; and failure to provide a reasonable accommodation in zoning/land use ordinances to permit supportive housing for persons with disabilities in a residential neighborhood.

Issue 1: discrimination based on disability for an alleged failure to provide a reasonable accommodation

Under the FHA, discrimination in housing against persons with disabilities includes the refusal to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford a person with a disability equal opportunity to use and enjoy a dwelling. Reasonable accommodations eliminate barriers that prevent persons with disabilities from fully participating in housing opportunities. The requirement to provide reasonable accommodations applies to both private housing providers and in government-assisted programs.

- [Vassallo v. The Park at Anzio, Civil Action No. 3:2021-cv-01093 \(M.D. Fla.\) \(filed 11/3/21, settlement entered and dismissed 5/26/22\).](#)

In this case, the plaintiff, a person with disabilities causing substantial mobility limitations and pain, sued the 350-unit apartment complex and property management company for repeatedly failing to provide as requested a wheelchair-accessible handicap parking space with an unobstructed path to his dwelling unit. Plaintiff's complaint also alleged that the defendants retaliated against him for asserting his fair housing rights by refusing to renew his lease. The case was referred to mediation by the court and the parties were able to reach a private settlement agreement prior to adjudication on the merits.

Issue 2: Discrimination based on disability for failure to design and construct accessible multifamily dwellings

Under the FHA, discrimination in housing against persons with disabilities includes a failure "to design and construct" covered multifamily dwellings so that they are accessible to and usable by persons with disabilities, in particular for people who rely on wheelchairs or mobility devices. Developers, builders, owners, and architects responsible for the design or construction of newly constructed multifamily developments of four or more units (intended for first occupancy after March 13, 1991) may be liable if properties fail to meet certain design features: an accessible entrance on an accessible route; accessible common and public use areas; doors sufficiently wide to accommodate wheelchairs; accessible routes into and through each dwelling; light switches, electrical outlets, and thermostats in accessible locations; reinforcements in bathroom walls to accommodate grab bar installations; and usable kitchens and bathrooms configured so that a wheelchair can maneuver throughout the space.

- [Disability Rights Florida, Inc. v. Summit Contractors Group, Inc., Civil Action No. 3:16-cv-00954 \(M.D. Fla.\) \(filed 7/26/2016; settlement agreement entered 6/30/2017\).](#)

Disability Rights Florida, Inc., a nonprofit advocacy agency, with representation from Jacksonville Area Legal Aid and the Florida Justice Institute sued the contractor, architectural

firm, property manager, and owner of three apartment complexes collectively known as Surfside in Jacksonville Beach. The apartment buildings, completed in late 2014, were built without ground floor apartments or elevators to residential units located on the two upper floors and without accessible space and features. Disability Rights Florida discovered through site visits, testing, and investigation that as a result, persons using a wheelchair or with a mobility impairment were effectively excluded from living at any of the three apartment complexes.

The parties ultimately reached a settlement requiring defendants to pay DRF \$120,000 in damages and to bring the properties into compliance with the FHA by installing and maintaining elevator lifts; retrofitting entry thresholds; modifying certain units to be adaptable and accessible; modifying bathrooms; constructing accessible pedestrian routes and mailboxes; and to adopt nondiscrimination policies and practices and provide a housing training program for employees conducted by JALA.

Issue 3: discriminatory zoning rules and land use decisions that exclude housing for persons with disabilities from certain residential districts

The FHA is not a zoning statute and fair housing laws do not preempt local zoning laws, but they do apply to municipalities and local government units and prohibit them from making zoning or land use decisions or implementing land use policies that exclude or otherwise discriminate against protected persons, including individuals with disabilities. If a local government's zoning power is exercised in a way that is inconsistent with the FHA, the federal law will control. For example, the FHA makes it unlawful to treat groups of persons with disabilities less favorably than groups of non-disabled persons; to take action against, or deny a permit, for a home because of the disability of its residents; and to refuse to make reasonable accommodations in land use and zoning policies and procedures where such accommodations may be necessary to afford persons or groups of persons with disabilities an equal opportunity to use and enjoy housing. The state FFHA explicitly prohibits discrimination in land use decisions and in permitting of development based on the usual seven protected classes and the source of financing of a proposed development. (FLA. STAT. § 760.26). Under Jacksonville's Fair Housing Ordinance, if the Jacksonville Human Rights Commission receives a housing discrimination complaint that involves the legality of a zoning or land use law/ordinance, the Commission must not pursue investigation but must refer the matter to the General Counsel's office. (ORDINANCE CODE OF THE CITY OF JACKSONVILLE, SEC. 408.510.)

- [Ability Housing, Inc. v. City of Jacksonville](#), Civil Action No. 3:15-cv-1380 (M.D. Fla.); [Disability Rights Florida, Inc. v. City of Jacksonville](#), Civil Action No. 3:15-cv-1411 (M.D. Fla.); [United States v. City of Jacksonville](#), Civil Action No. 3:16-cv-1563 (M.D. Fla.).

In 2017, the City of Jacksonville settled three lawsuits, which were consolidated by the federal district court, alleging the city violated the Fair Housing Act and Americans with Disabilities Act when it refused to grant plaintiff Ability Housing development approvals to revitalize a 12-unit apartment building in the Springfield neighborhood as permanent supportive housing for veterans with disabilities and then retaliated against Ability Housing when it filed a complaint. The pleadings alleged that the city bowed to intense community pressure based on stereotypes about the disabilities of the expected residents in interpreting the zoning code to distinguish allowed by right multifamily housing from the proposed use of the subject property and deem it a prohibited special use in the Springfield Overlay District. As a result, Ability Housing—a nonprofit based in Jacksonville whose mission is to provide affordable, inclusive housing for families at risk of homelessness and adults with disabilities—lost a \$1.35 million grant from the state and the subject property.

Although Jacksonville denied that it had violated any fair housing laws, the parties negotiated settlement agreements to avoid further litigation and a trial. In June 2019, the parties filed a joint stipulation of dismissal and the district court dismissed and closed the private lawsuits and entered a Consent Decree between the United States and the City containing the terms of settlement. As part of the City's settlement obligations, it agreed to rescind the written interpretation that prevented Ability Housing from providing the proposed housing, agreed to pay \$400,000 to Ability Housing and \$25,000 to Disability Rights Florida in damages, and to establish a \$1.5 million grant to develop permanent supportive housing in the City for people with disabilities. In accordance with the private settlement agreements, the City amended its zoning code on May 23, 2017, to: include a procedure approved by the DOJ for persons with disabilities to request reasonable accommodations from provisions of the zoning code; explicitly recognize that a disabled resident's receipt of supportive services in a dwelling unit does not change the classification of the dwelling unit into another type of differently regulated use, making clear that the permanent supportive housing at issue should be characterized as a multifamily use and permitted wherever other multifamily dwellings are permitted; remove restrictions that apply to housing for persons with disabilities; allow group care homes for persons with disabilities by exception in the RMD-S district; and allow residential treatment facilities by exception in the CCG-S district.

The separate settlement with the United States required the City to pay a \$25,000 civil penalty; designate a fair housing compliance officer to receive complaints against the City and coordinate the City's compliance with the settlement agreement obligations; and provide FHA and ADA training for City employees. The Consent Decree remained in effect for five years, with the court maintaining jurisdiction and enforcement authority.

xxi. The PHA may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.

Jacksonville Area Legal Aid works with the Jacksonville Human Rights Commission to host an annual Fair Housing Symposium. JALA reports that it has a supportive, collaborative relationship with JHA and other area fair housing and disability rights organizations.

VI. FAIR HOUSING GOALS AND PRIORITIES

- A. For each fair housing issue (segregation/integration; R/ECAPs; Disparities in Access to Opportunity; Disproportionate Housing Needs; Disability and Access; Publicly Supported Housing; Fair Housing Enforcement, Outreach Capacity, and Resources Analysis) as analyzed in the Fair Housing Analysis section, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.**
- B. For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.**

Listed in the table below are the fair housing issues with their associated contributing factors. The contributing factors are organized into two groups: priority contributing factors are those that are most likely to limit or deny fair housing choice or access to opportunity; non-priority contributing factors are likely to also have a causal relationship to the fair housing issue but are less directly or immediately able to remedy the named issue.

TABLE 22: CONTRIBUTING FACTORS BY PRIORITY LEVEL

Housing Issue	Priority Contributing Factors	Non-Priority Contributing Factors	Priority Justification
Segregation/ Integration	<ul style="list-style-type: none"> •Historic redlining •Lack of public and private investment in historically Black neighborhoods •Community opposition to affordable housing development and voucher acceptance •Source-of-income discrimination by landlords against voucher use 	<ul style="list-style-type: none"> •Policy development not centering community voices •Less environmental resiliency in low-income neighborhoods •Appraisal bias in which realtors undervalue homes in segregated areas 	<p>Stakeholders in Jacksonville consistently noted past redlining as a primary reason for current patterns of residential segregation within the city. Redlining was a historical practice in which banks and financial institutions refused to extend loans for properties within “undesirable” or “hazardous” neighborhoods, which almost exclusively translated to neighborhoods with primarily Black residents. This practice began in the U.S. in the 1930s and was in theory legally ended by the Fair Housing Act of 1968, which prohibits discrimination concerning the sale, rental, and financing of housing based on race, color, religion, national origin, (and as amended) sex, disability, and family status. However, unofficial discriminatory lending and renting has continued to a lesser degree. Perhaps more importantly, historically redlined areas still suffer from declining infrastructure and a lack of resources and services due to a consistent lack of investment and funding. Patterns of historic redlining in Jacksonville correspond to current day patterns of segregation and areas designated as R/ECAPs, or Racially/Ethnically Concentrated Areas of Poverty.</p>

Housing Issue	Priority Contributing Factors	Non-Priority Contributing Factors	Priority Justification
Racially/Ethnically Concentrated Areas of Poverty	<ul style="list-style-type: none"> •Historic redlining •Lack of public and private investment in historically Black neighborhoods •Location of public housing and project-based voucher properties •High housing costs and lack of affordable housing •Community opposition to affordable housing development and voucher acceptance •Source-of-income discrimination by landlords 	<ul style="list-style-type: none"> •Policy development not centering community voices •Less environmental resiliency in low-income neighborhoods •Appraisal bias in which realtors undervalue homes in segregated areas •Lack of transit options in higher-income neighborhoods 	<p>R/ECAPs in Duval County and the region are clustered in the census tracts around downtown Jacksonville (see Figure 36). Of the 13 R/ECAP tracts, seven have populations that are more than 85% Black or African American, indicating disparities in access to low-poverty neighborhoods by race and ethnicity.</p> <p>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. In this way, the locations of public housing and project-based voucher properties contribute to clustering of public housing residents in areas of the county with higher poverty rates. Jacksonville Housing staff members noted that the agency is always looking for new properties, but its ability to purchase properties is limited by high land and housing costs in the county.</p> <p>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. Factors such as transportation access and social networks also shape residents' choices to live in specific neighborhoods.</p>

Housing Issue	Priority Contributing Factors	Non-Priority Contributing Factors	Priority Justification
Disparities in Access to Opportunity	<ul style="list-style-type: none"> •Continued need for neighborhood investment in areas with high poverty rates and low levels of access to resources and services •Low labor market engagement and limited incomes restrict housing choice and access to opportunity among protected classes •High housing costs in high-opportunity areas •Location of much of the county's public housing in neighborhoods that experience underinvestment •Limited acceptance of vouchers by landlords 	<ul style="list-style-type: none"> •Location of much of the county's public housing in neighborhoods that experience underinvestment •Voucher amounts insufficient to afford housing •Transportation availability limits access to jobs 	Access to opportunity in Jacksonville is limited by high housing costs in areas of opportunity and a lack of public and private investment, particularly in the neighborhoods north of and surrounding downtown Jacksonville, many of which are racially and ethnically concentrated areas of poverty. Residents and stakeholders also noted that access to opportunity is limited by the location of much of the county's public housing in neighborhoods that experience underinvestment, limited acceptance of vouchers by landlords, insufficient voucher amounts. Low frequency of public transportation and reduced access to jobs in some of the county's high-opportunity areas make it difficult for residents without access to vehicles to live in those areas.
Disproportionate Housing Need	<ul style="list-style-type: none"> •Availability of affordable units in a range of sizes and good condition •High housing costs and lack of affordable housing •Community opposition to affordable housing development and voucher acceptance •Loss of affordable housing •Location and type of affordable housing •Source of income discrimination •Lack of property upkeep by landlords in low-income neighborhoods •Restrictive housing assistance qualification metrics 	<ul style="list-style-type: none"> •Availability, type, frequency, and reliability of public transportation •Impediments to mobility •Displacement of residents due to economic pressures 	One of the most cited issues among community members and stakeholders was an overall lack of affordable housing options in the Jacksonville region. 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. Conversations with residents living in racially/ ethnically concentrated areas of poverty and low-income neighborhoods focused on issues regarding the physical conditions of housing units. This issue is further supported by mapping analysis, which demonstrates that households experiencing at least one of the four HUD-defined housing problems tend to be clustered around Jacksonville's central urban core, either within or near R/ECAP tracts.

Housing Issue	Priority Contributing Factors	Non-Priority Contributing Factors	Priority Justification
Publicly Supported Housing Location and Occupancy	<ul style="list-style-type: none"> •Community opposition to affordable housing •Lack of public and/or private investment in specific neighborhoods, including services and amenities •Policies related to payment standards, FMR, and rent subsidies •Admissions and occupancy policies and procedures, including preferences in publicly supported housing •Impediments to mobility •Lack of access to opportunity due to high housing costs •Lack of publicly supported units in good condition •Location of publicly supported housing •Siting selection policies, practices, and decisions for publicly supported housing •Source of income discrimination 	<ul style="list-style-type: none"> •Quality of affordable housing information programs 	<p>Policies related to assistance qualification and subsidies were frequently cited frustrations in conversations with community members receiving public housing assistance and stakeholders working in housing and community development. Increases in household income might disqualify households from housing assistance but would still not enable residents to afford market rate rents in the area. Residents and stakeholders linked negative perceptions about public housing to inequalities across Jacksonville neighborhoods, patterns of investment, and disparities in access to opportunity. Lastly, residents who receive public housing assistance shared frustrations about the condition of their units, such as poor insulation, pest infestations, and plumbing issues.</p>
Disability and Access Issues	<ul style="list-style-type: none"> •Access to publicly supported housing in good condition for persons with disabilities •Access to transportation for persons with disabilities •Location of accessible housing •Lack of affordable, accessible housing in range of unit sizes •Lack of affordable in-home or community-based supportive services •Lack of affordable, integrated housing for individuals who need supportive services 	<ul style="list-style-type: none"> •Inaccessible public or private infrastructure •Lack of assistance for transitioning from institutional settings to integrated housing •Lack of public and/or private investment in specific neighborhoods, including services or amenities •State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, and other integrated settings 	<p>A lack of affordable accessible housing for people with disabilities was one of most common issues noted by residents and stakeholders during community workshops and focus groups, and this finding is supported by data and mapping analyses conducted as part of this assessment. Persons with disabilities utilize Jacksonville Housing's public housing and HCV programs at more than double their shares of the city's population, suggesting that these programs are significant in meeting the housing needs of a population that experiences difficulties accessing housing. However, there are not enough accessible vouchers and units to meet are demand. Moreover, affordable accessible housing is concentrated in the central region of Jacksonville either within or adjacent to R/ECAPS, further limiting housing options for people with disabilities.</p>

Housing Issue	Priority Contributing Factors	Non-Priority Contributing Factors	Priority Justification
Fair Housing Enforcement, Outreach Capacity, and Resources	<ul style="list-style-type: none"> •Continued need for fair housing education and enforcement •Lack of funding for fair housing organizations and agencies relative to demand for services •Need to increase awareness of fair housing resources and rights 		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.

TABLE 23: FAIR HOUSING PRIORITIES AND GOALS

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe	Responsible Entities
Implement place-based community investment strategies to increase opportunity measures in R/ECAPs and formerly redlined areas	<ul style="list-style-type: none"> •Continued need for neighborhood investment in areas with high poverty rates and low levels of access to resources and services •High housing costs in high-opportunity areas •Location of much of the county's public housing in neighborhoods that experience underinvestment •Limited acceptance of vouchers by landlords •Historic redlining •Lack of public and private investment in historically Black neighborhoods 	Disparities in Access to Opportunity, R/ECAPs, Housing Needs, Publicly Supported Housing	<ul style="list-style-type: none"> •Designate a senior staff person to follow developments within the Choice Neighborhoods program and consider opportunities to propose projects (Ongoing, 2023) •Strengthen connections between Jacksonville Housing and City elected officials and local government planners to shape community improvements and large-scale planning efforts (Ongoing, 2023) •Align with strategies from Jacksonville's 2022-2030 Comprehensive Plan to improve infrastructure, housing, transportation, and property rights in previously redlined areas by the year 2030 (Ongoing, 2023) •Provide periodic workshops to train Jacksonville Housing residents in political advocacy to support residents in pressing for community investments in their neighborhoods (Ongoing, 2023) •Fund or collaborate on projects that develop, expand, or improve community spaces and programming, parks, food access, and development of needed retail and services in low- and moderate-income census tracts, and particularly in R/ECAP census tracts. Partner with local organizations such as LISC Jacksonville to gain understanding of community funding needs (Ongoing, 2023) •Investigate whether the Biden administration's Community Revitalization Fund has the potential to provide additional financial resources to Jacksonville's previously redlined neighborhoods and, if so, encourage and assist local Community Development Corporations in the application process (Ongoing, 2023) •Partner with the school district, local nonprofits, and others to provide resources and services to students attending lower-performing schools (ex: Boulder Housing Partners' Bringing School Home program) (Ongoing, 2023) 	Jacksonville Housing, City of Jacksonville, Duval County Public Schools, community partners,

Discussion: 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.

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe	Responsible Entities
Support residents' engagement with the labor market.	<ul style="list-style-type: none"> •Low labor market engagement and limited incomes restrict housing choice and access to opportunity among protected classes •Continued need for neighborhood investment in areas with high poverty rates and low levels of access to resources and services •High housing costs in high-opportunity areas •Location of much of the county's public housing in neighborhoods that experience underinvestment •Limited access to public transportation in some areas of the county with access to jobs 	Disparities in Access to Opportunity, R/ECAPs, Publicly Supported Housing	<ul style="list-style-type: none"> •Continue to support residents' participation in job search, placement, and training programs, such as Jobs Plus. Consider expanding the Jobs Plus Program to additional public housing locations. Promote residents' awareness of the program (Ongoing, 2023) •Keep track of developments in HUD's Moving to Work Demonstration Program and consider opportunities to apply in order to increase flexibility in service coordination and to implement intensive self-sufficiency services such as linking rental assistance with supportive services, escrow accounts, earned income exclusions, increased case management services, and self-sufficiency requirements, and to support access to educational supports for children (ex: Boulder Housing Partners' Bringing School Home program) (Ongoing, 2023) •Keep track of developments in the Purpose Built Communities program and consider opportunities to partner with other community stakeholders to join the network or implement a similar model to support investments in cradle to college education and community wellness along with investments in mixed-income housing. Consider meeting with key stakeholders in other Florida or Georgia cities that have implemented this model to share information (Ongoing, 2023) •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 (Ongoing, 2023) •Continue to build relationships with employers and workforce agencies to provide career pathways and information to residents (Ongoing, 2023) •Collaborate with residents to understand barriers to accessing employment and education programs, and develop strategies to address these barriers (Ongoing, 2023) •Provide scholarships and resources to residents participating in or interested in community college or technical school programs (Ongoing, 2023) •Collaborate 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 (Ongoing, 2023) •Develop public and affordable housing in high-opportunity neighborhoods with access to jobs and public transportation (Ongoing, 2023) •Include residents, business owners, industry representatives, and representatives from neighborhood groups in planning processes for workforce development programs (Ongoing, 2023) 	Jacksonville Housing, local employers, workforce agencies, educational institutions, community partners

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe	Responsible Entities
------	----------------------	---------------------	------------------------------------	----------------------

Discussion: 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.

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe	Responsible Entities
Increase supply of affordable housing in good condition	<ul style="list-style-type: none"> •Availability of affordable units in a range of sizes •Lack of access to opportunity due to high housing costs •Lack of public and/or private investment in specific neighborhoods, including services or amenities •Loss of affordable housing •Lack of public and private investment in housing •Lack of affordable housing in good condition 	Segregation/ Integration; R/ECAPS; Disproportionate Housing Needs; Publicly Supported Housing; Disparities in Access to Opportunity	<ul style="list-style-type: none"> •Track HUD funding opportunities throughout the fiscal year and apply for relevant program funding when announced (Ongoing, 2023) •Continue to utilize the Rental Assistance Demonstration (RAD) Project Based Voucher (PBV) program to access additional sources of funding to maintain, repair, and replace public housing units and to develop workforce housing (Ongoing, 2023) •Use S&P credit rating (expected in December 2022) to issue bonds in order to build or acquire new affordable housing (2023) •Consider ways to combine other funding sources and mechanisms for flexibility in developing new housing, including Low Income Housing Tax Credits and flexibilities included in the Moving to Work program, which may be used to support programs such as developing mixed-income and tax credit properties, landlord incentives, foreclosure prevention, mortgage assistance and homeownership programs, and increasing the percentage of project-based vouchers (Ongoing, 2023) •Partner with the City of Jacksonville and other stakeholders to address how zoning regulations limit missing middle and multifamily housing types, such as by considering upzoning more corridors and acreage to zoning districts that allow greater diversity of housing types by right, rather than waiting on developers to seek rezoning of specific parcels (ex: jurisdiction-wide upzoning or upzoning more acreage to medium/high density multifamily and mixed-use zones; adopting minimum density requirements; upzoning in single family districts; and rezoning underutilized industrial/ commercial areas for adaptive residential use) (Ongoing, 2023) •Partner with the City of Jacksonville and other stakeholders to support the development of an inclusionary zoning ordinance (Ongoing, 2023) •Use the first right of refusal to purchase mechanism in Jacksonville's City Ordinance to purchase a portion of affordable housing units approved and developed through F.S. § 166.04151(6) or through an inclusionary zoning ordinance, if developed (Ongoing, 2023) 	<ul style="list-style-type: none"> •Jacksonville Housing •Local nonprofits •Florida Housing Finance Corporation (FHFC) •Finance Authority •State Housing Initiatives Partnership (SHIP) •State Apartment Incentive Loan (SAIL) fund •Florida Housing Coalition

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe	Responsible Entities
			<ul style="list-style-type: none"> •Partner with the City of Jacksonville in exploring opportunities to expand alternative and low-impact affordable housing options like Accessory Dwelling Units (ADUs) (Ongoing, 2023) •Ensure at least one senior member of JH staff attends the Florida Housing Coalition's annual conference to network and build relationships with potential development partners (Ongoing, 2023) •Present annual PHA plans with specific priorities and goals for future development to the Resident Advisory Board and the public for comment (Ongoing, 2023) •Ensure that requests for inspections of properties are addressed quickly and needed remediations are completed and documented (Ongoing, 2023) 	

Discussion: 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.

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe	Responsible Entities
Increase affordable, accessible housing options for people with disabilities	<ul style="list-style-type: none"> •Access to publicly supported housing in good condition for people with disabilities •Access to transportation for people with disabilities •Location of accessible housing •Lack of affordable, accessible housing in range of unit sizes •Lack of affordable in-home or community-based supportive services •Lack of affordable, integrated housing for individuals who need supportive services 	Disability and Access; Disparities in Access to Opportunity; Publicly Supported Housing; Fair Housing Enforcement; Disproportionate Housing Needs	<ul style="list-style-type: none"> •Track HUD funding opportunities throughout the fiscal year and apply for Special Housing Vouchers and Section 811 when announced (Ongoing, 2023) •Develop partnerships with disability advocacy organizations in the region in order to collaborate with residents with disabilities to better understand the housing challenges they face and work to develop solutions and to create more housing opportunities and services for persons with disabilities (Ongoing, 2023) •Work with Jacksonville Area Legal Aid to identify the fair housing issues that persons with disabilities most frequently face and develop strategies to address them (Ongoing, 2023) •In addition to meeting required ADA standards in new construction, consider incorporating universal design principles in future developments; appropriate JH staff should be directed to evaluate and recommend specific universal design principles that can feasibly be integrated into future projects (Ongoing, 2023) •Partner with the City of Jacksonville to review data and results regarding the implementation of the 2017 Consent Decree that expired in June of this year (Ongoing, 2023) •Partner with disability advocacy organizations, the City of Jacksonville, and other stakeholders to how a Universal Design Ordinance could support the production of housing for people with disabilities (Ongoing, 2023) 	<ul style="list-style-type: none"> •Ability Housing •Arc Jacksonville •Jacksonville Area Legal Aid •CIL Jacksonville •Mental Health Resource Center Inc (MHRC) •Jacksonville Transportation Authority (JTAFLA) •City of Jacksonville

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe	Responsible Entities
------	----------------------	---------------------	------------------------------------	----------------------

Discussion: 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).

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe	Responsible Entities
Increase access to public, assisted, and affordable housing in areas with access to opportunity	<ul style="list-style-type: none"> •Community opposition to affordable housing •Lack of public and/or private investment in specific neighborhoods •Impediments to mobility •Lack of access to opportunity due to high housing costs •Lack of publicly supported units in good condition •Location of publicly supported housing •Siting selection policies, practices, and decisions for publicly supported housing 	R/ECAPS; Disparities in Access to Opportunity; Disproportionate Housing Needs; Publicly Supported Housing	<ul style="list-style-type: none"> •Develop goals for public and affordable housing development in areas with high levels of access to opportunity, including Rental Assistance Demonstration (RAD) Project Based Voucher properties, to increase access to public and assisted housing in high-opportunity neighborhoods, particularly those with low Housing Choice Voucher acceptance (Ongoing, 2023) •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 (Ongoing, 2023) •Implement education and incentive programs for landlords to encourage participation in the Housing Choice Voucher program. Conduct intentional outreach to landlords managing properties in areas such as the Southside and the Beaches, where little publicly assisted housing exists (Ongoing, 2023) •Host workshops in neighborhoods with high opposition to public and affordable housing to address misconceptions and promote support for affordable housing development, collaborating with current public housing residents and a wide range of stakeholders (Ongoing, 2023) •Partner with the City of Jacksonville, fair housing organizations, affordable housing developers, and other stakeholders to 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 (Ongoing, 2023) •Partner with the City of Jacksonville and other stakeholders to address how zoning regulations limit missing middle and multifamily housing types, such as by considering proactively upzoning more corridors and acreage to zoning districts that allow a greater diversity of housing types by right, rather than waiting on developers to seek rezoning of specific parcels (Ongoing, 2023) 	<ul style="list-style-type: none"> •Jacksonville Housing •City of Jacksonville •Local landlords •HUD •Florida Housing Coalition •Florida Association of Housing and Redevelopment Officials •Local business owners •Neighborhood coalitions/ organizations •Florida Housing Finance Corporation

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe	Responsible Entities
------	----------------------	---------------------	------------------------------------	----------------------

Discussion: 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.

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe	Responsible Entities
Increase HCV program capacity and acceptance	<ul style="list-style-type: none"> •Lack of public and private investment in historically Black neighborhoods •Community opposition to affordable housing development and voucher acceptance •Source-of-income discrimination by landlords against voucher use 	Segregation and Integration; R/ECAPS; Publicly Supported Housing	<ul style="list-style-type: none"> •Search for opportunities to increase funding to the Housing Choice Voucher program to increase program capacity (ex: funding targeting specific protected groups such as veterans). Set goal for increased voucher program capacity (ex: 15% increase in capacity by 2025) (Ongoing, 2023) •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 (Ongoing, 2023) •Conduct a focus group with landlords to determine the greatest barriers to voucher acceptance. Develop strategies to address barriers (Ongoing, 2023) •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, subsidized repairs for HCV residences or partnering with Duval County to implement property tax breaks for HCV residences (Ongoing, 2023) •Implement education programs for landlords to encourage participation in the Housing Choice Voucher program. Conduct intentional outreach to landlords managing properties in areas such as the Southside and the Beaches, where little publicly assisted housing exists (Ongoing, 2023) 	Jacksonville Housing

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe	Responsible Entities
------	----------------------	---------------------	------------------------------------	----------------------

Discussion: 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.

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe	Responsible Entities
Support continued access to affordable housing as individuals and families increase incomes	<ul style="list-style-type: none"> •Restrictive housing assistance qualification metrics 	Publicly Supported Housing; Disproportionate Housing Needs	<ul style="list-style-type: none"> •Use S&P credit rating to issue bonds in order to build or acquire workforce and mixed-income housing to address the needs of residents whose incomes fall above HUD-established income limits for public and assisted housing, up to 140% of the area median income, with a particular focus on housing affordable to households earning up to 80% of the area median income (Ongoing, 2023) •Keep track of research regarding impacts of the Moving to Work Demonstration Program Rent Reform Demonstration and consider implementing policies demonstrated to support residents in maintaining housing assistance while increasing income (Ongoing, 2023) •Implement an assistance program to assist disqualified households in finding new housing, including support in areas such as security deposit assistance, moving assistance, and housing search assistance (Ongoing, 2023) 	Jacksonville Housing

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe	Responsible Entities
------	----------------------	---------------------	------------------------------------	----------------------

Discussion: 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.

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe	Responsible Entities
Reduce and limit the impact of community opposition to affordable housing development and acceptance of Housing Choice Vouchers	<ul style="list-style-type: none"> •Community opposition to affordable housing development and voucher acceptance 	Segregation/ Integration, R/ECAPs, Publicly Supported Housing, Disparities in Access to Opportunity	<ul style="list-style-type: none"> •Partner with the City of Jacksonville to consider how F.S. § 125.01055/ §166.04151 may be implemented to support affordable housing development, such as by adopting an ordinance that explicitly permits and provides review criteria for its City Council to approve, approve with conditions, or reject affordable development proposals in certain zoning districts without requiring a rezoning or change of the Comprehensive Plan's Future Land Use designation (2023) •Partner with the City of Jacksonville and other stakeholders to address how zoning regulations limit missing middle and multifamily housing types, such as by considering upzoning more corridors and acreage to zoning districts that allow greater diversity of housing types by right, rather than waiting on developers to seek rezoning of specific parcels (ex: jurisdiction-wide upzoning or upzoning more acreage to medium/high density multifamily and mixed-use zones; adopting minimum density requirements; upzoning in single family districts; and rezoning underutilized industrial/ commercial areas for adaptive residential use) (Ongoing, 2023) •Partner with the City of Jacksonville, fair housing organizations, affordable housing developers, and other stakeholders to 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 (2023) •Implement community education programs on the benefits of affordable housing development, including initiatives such as conducting tours of successful affordable housing properties in Jacksonville for local leaders and other interested parties, to build public support for affordable housing development (Ongoing, 2023) •Ensure that Jacksonville Housing staff with responsibility for meeting facilitation receive training at least every other year on techniques to counter NIMBYism, such as framing community discussions to support residents in providing input on elements such as design, amenities, and services in affordable housing development, rather than offering perceived veto power (Ongoing, 2023) 	Jacksonville Housing

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe	Responsible Entities
------	----------------------	---------------------	------------------------------------	----------------------

Discussion: 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).

Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe	Responsible Entities
Support fair housing education and enforcement efforts	<ul style="list-style-type: none"> •Lack of resources for fair housing organizations and agencies 	Fair housing enforcement, outreach capacity, and resources	<ul style="list-style-type: none"> •Provide education to housing providers and property managers regarding their fair housing responsibilities and liabilities (Ongoing, 2023) •Disseminate community-oriented fair housing education materials, including information on resources available, in print and online (Ongoing, 2023) •Partner with fair housing organizations to host fair housing workshops and trainings and connect residents with affordable fair housing/legal services (Ongoing, 2023) 	Jacksonville Housing, fair housing organizations and agencies

Discussion: 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.