

Omaha-Council Bluffs Regional Assessment of Fair Housing

City of Omaha and
Participating Partners

Draft for Public Comment

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Attachments A-O

SECTION I.

Instructions for Public Comment

This draft of the Regional Fair Housing Assessment will be open for public comment from May 14, 2018 to June 29, 2018. All public comments can be emailed to fairhousing2018gmail.com or mailed to City of Omaha Planning Department, 1819 Farnam St. Suite 1111, Omaha, NE 68183.

Program partners will review all comments submitted. A response will be provided in a timely manner in the same format the comments are received. Comments sent by mail should include a return address. In order to ensure that comments are addressed quickly and most effectively incorporated into the final draft of the document, please consider the following:

- Organize comments by headings or sections
- Reference exact locations for corresponding comments
- Be specific when explaining a viewpoint
- Include details for alternative suggestions
- Provide supporting evidence or data

SECTION II.

Executive Summary

SECTION II. EXECUTIVE SUMMARY

Part I

Purpose of the Assessment of Fair Housing

Part II

Regional Boundaries and Participating Partners

Part III

Summary of Community Engagement

Part IV

Key Findings

Part V

Fair Housing Goals

Part I Purpose of the Assessment of Fair Housing

Key Terms:

AFFH : HUD rule requiring grantees to take efforts to affirmatively further fair housing

AFH: The assessment of fair housing required by the AFFH rule to evaluate fair housing issues and prioritize goals regarding fair housing

The Department of Housing and Urban Development (HUD) published the Rule on Affirmatively Furthering Fair Housing (AFFH) in July of 2015. According to HUD, “affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a program participant's activities and programs relating to housing and urban development (HUD, 2018).”

The purpose of the rule was to clarify and simplify fair housing requirements for recipients of federal housing dollars. The rule requires these grantees to conduct an Assessment of Fair Housing (AFH) in order to better understand local and regional fair housing issues and to set priorities and goals as based on their analysis (HUD, 2018).

The AFFH rule impacts planning processes and creates increased accountability for fair housing guidelines. “Local governments, Public Housing Authorities, States, and Insular Areas must be involved in fair housing planning to ensure follow through on the obligation to affirmatively further the policies of the Fair Housing Act. These policies include the policy of ensuring that persons are not denied equal opportunities in connection with housing because of their race, color , national origin, religion, disability , sex, or familial status . They also include the policy of overcoming patterns of segregation and the denial of access to opportunity that are part of this nation’s history (HUD, 2015).”

Part II Regional Boundaries and Participating Partners

The “region” being assessed for this Regional AFH encompasses a two-state, eight-county Metropolitan Statistical Area (MSA). The counties include Douglas, Sarpy, Cass, Washington, and Saunders in Nebraska, and Pottawattamie, Mills, and Harrison in Iowa.

HUD defines a “jurisdiction” as, “the legal authority of a government body to enforce the law in a given set of circumstances (24 CFR § 92.105).” For the purpose of this assessment, the jurisdictions refer to the cities participating in the Assessment of Fair Housing (AFH), including Omaha, Council Bluffs, and Bellevue. Omaha Housing Authority (OHA), Douglas County Housing Authority (DCHA), Council Bluffs Municipal Housing Agency (MHA), and the Bellevue Housing Authority (BHA) are participating partners. The Council Bluffs/City of Omaha Consortium is the lead entity for this AFH.

This section will provide an overview of the data and analysis for the participating jurisdictions. The trends found in jurisdictions will be compared to the larger region. Details for cities in counties included in the region, but who are non-participating partners (e.g. Fremont or Wahoo) will not be included in the analysis unless they are relevant to large-scale housing trends.

The seven program partners collaborated to identify regional issues and goals based on HUD-provided data, local data, and community input. The jurisdictions also worked separately to provide information and analysis on questions identified by HUD to identify impediments to fair housing for their community. The sections created by and for a specific jurisdiction will be color coordinated by City as follows:

Omaha

Council Bluffs

Bellevue

When necessary, information created by the Public Housing Authorities will also be identified using the acronym associated with the corresponding housing authority.

Omaha Housing Authority- OHA

Douglas County Housing Authority- DCHA

Council Bluffs Municipal Housing Agency- MHA

Bellevue Housing Authority- BHA

Part III Summary of Community Engagement

Purpose and Process

The regional fair housing analysis included a robust community participation process. The engagement process provided opportunities for residents across the region to share knowledge and provide input related to fair housing issues both online and at community events. A wide range of stories, surveys, conversations, and activities pointed to common challenges and priorities in the area. Community input was essential to identifying obstacles to opportunity and access to fair housing in Omaha, Council Bluffs, and Bellevue. These factors were the foundation for regional and jurisdiction goals.

Events and Activities

12 Stakeholder meetings in areas of focus including:

Non-profit and Advocacy Groups

Development Community

Chamber of Commerce

Disability Community

LGBTQ Community

South Omaha/Latinx Meeting

North Omaha Business and Community Leaders

Empowerment Network Event

Realities in Housing Conference (Lenders and Real Estate)

15 Open house meetings;

These meetings were informative and interactive events where attendees could both learn and provide feedback about fair housing and the AFFH process. Meetings were held in Council Bluffs, Bellevue, and several locations in the Omaha area including Northeast and Southeast Omaha, Midtown, Northwest, Southwest, and Elkhorn locations.

Multiple community events and neighborhood meetings including:

Staff members attended festivals, parades, farmer's markets, conferences, and back-to-school events across the city with a focus on promoting the AFFH website and regional survey. The AFFH team attended all Neighborhood Alliance meetings and provided a presentation at the One Omaha board meeting. An announcement was sent to all neighborhood leaders requesting an opportunity to present information about the AFFH

at their association meetings. We sent out a specific request to the 16 neighborhood leaders in the census tracts identified by HUD as R/ECAPs (Racially and/or Ethnically Concentrated Areas of Poverty). Six of the 16 neighborhoods requested and received a presentation on the fair housing initiative. In addition, two “Realities in Housing” conferences were held focused on promoting the AFFH guidelines to the real estate community, landlords, investors, and lenders in the housing community.

Outreach to the Limited English Proficiency community and refugee community:

The regional housing survey was translated specifically for the refugee community in Omaha. AFFH information was presented to the Refuge Task Force. Both the Human Rights and Relations and Planning staff met with interpreters and refugee families at Lutheran Family Services to ask questions about their housing experiences in Omaha. The team also sent information about the initiative to Omaha Public Schools representatives working with refugee families.

Personal Interviews:

Evaluation of community outreach was an ongoing process throughout the Assessment of Fair Housing. As gaps in engagement were identified, attempts were made to reach out to community members and experts to provide more information about specific groups or topics.

Surveys:

- Regional Fair Housing Survey: Covered a range of issues related to fair housing, access to opportunity, and neighborhood health and safety. The survey was translated into over ten languages and distributed online and in paper copies at multiple meetings, events, and locations across the city. Over 1,700 responses were collected from a large demographic of residents across the region.
- What is AFFH? Survey: Distributed by the Human Rights and Relations and Planning Department over the last two years. Questions were focused on experiences of discrimination. This survey was also translated into multiple languages.
- Refugee Housing Survey: Conducted at Lutheran Family Services with the aid of translators to refugee families. This abbreviated survey focused on new refugee families and their personal challenges in obtaining housing in Omaha.
- Tax Increment Financing (TIF) Developer Survey: Distributed by City Planning staff to a select group of TIF developers to gain feedback on the challenges and benefits of developing affordable housing in Omaha.

On October 24th an Affirmatively Furthering Fair Housing Forum was held at the Scottish Rite Center. The purpose of this regional public meeting was to reflect back to the community what was heard during the period of public engagement from June through September of 2017. Attendees were able to see the data gathered from a variety of meetings and surveys and gain a better understanding of how that information was used by regional leaders to identify both jurisdictional and contributing factors to fair housing. Attendees also had the opportunity to share written comments and concerns on regional priorities and strategies and suggestions to overcome barriers in access to opportunities. The event also included speakers on key topics related to the AFH including the disability community, fair housing policy, and transportation. The comments from attendees at the forum echoed the concerns expressed during the engagement period. The community's greatest priorities include:

- More affordable housing across the region but especially along transit routes and near major employers
- More housing and transportation for the disability community
- Increased investment in the form of jobs in R/ECAP areas
- Addressing deteriorated housing stock in R/ECAP areas
- More effective affordable housing policy and more education about fair housing policy
- More single family affordable, elderly affordable, and multifamily affordable housing across the city

For more details on the community engagement process, see Section III. Community Participation Process.

Part IV Key Findings

OMAHA

A summary of the Assessment of Fair Housing findings are included below. The information is organized according to topics designated by HUD for fair housing analysis focused on the seven federally protected classes: race, color, religion, sex, disability, familial status, and national origin.

HUD provided an AFFH Data and Mapping Tool created to assist regional partners in the fair housing analysis. Tables and maps that informed this summary can be accessed online at: <https://egis.hud.gov/affht>.

Segregation/Integration

Redlining practices that began in the 1930's shaped Omaha into a city divided by race/ethnicity. Although these federally supported segregation practices ended with the Fair Housing Act of 1968, segregation remains moderate to high throughout the City of Omaha. The majority of minority households in the city are concentrated in Northeast and Southeast Omaha. Many neighborhoods to the west of 72nd Street have majority White households. These communities are the most insular, some having population where over 90% of the residents identify as white.

Contributing factors of segregation include:

- Community Opposition
- Lack of private investments
- Loss of affordable housing
- Location and type of affordable housing
- Planning practices of the 1970's
- Lending discrimination
- Source of income discrimination
- Private discrimination

Racially and/or Ethnically Concentrated Areas of Poverty (R/ECAP)

R/ECAPs are Census tracts with over 50% of the population identifying as a racial or ethnic minority group, in addition to 40% or more of the households in that same tract with an annual income that qualifies at or below the federal poverty guideline. In 2010, there were nine Census tracts in Northeastern and Southeastern Omaha that qualified as R/ECAPs. Based on 2016 data, there are six R/ECAPs remaining in the eastern portion of the city.

The R/ECAPS in Northeastern Omaha have large percentage of Black households, while those in the Southeastern part of the city have large percentages of Hispanic households. Limited English Proficiency (LEP) households, including refugee and new immigrant families, have also settled in large numbers in these areas. These R/ECAP areas have the highest rates of unemployment, oldest housing stock, most significant housing problems, and greatest risk of environmental hazards including lead and asbestos. The R/ECAPS areas also have a large amount of affordable and publicly supported housing. The lack of affordable housing and publicly supported housing options outside of these areas makes mobility or housing choice for low-income families very difficult.

Contributing Factors to R/ECAPs:

- Community opposition
- Private discrimination
- Deteriorated and abandoned properties
- Displacement of residents due to economic pressures
- Lack of private investment in specific neighborhoods
- Lending discrimination
- Location and type of affordable housing
- Lack of affordable housing in a range of units and sizes
- Source of income discrimination
- Occupancy codes and restrictions
- Siting selection policies, practices, and decisions for publicly supported housing

Disparities in Access to Opportunity

HUD designated five categories for the analysis of disparities in access to opportunity: Education, employment, transportation, low poverty neighborhoods, and environmentally healthy neighborhoods.

Education:

Data for Omaha regarding access to proficient schools shows barriers in opportunity for students who are Black, Hispanic, and Native American. The impact of segregation on housing patterns within the city has created significant differences in the demographic makeup of the four public school districts in Omaha. Most HUD data focuses on public schools; however, public engagement and local data confirm that disparities in access to education are observed in the birth-to-five population.

Based on the location of each school district, Omaha Public Schools (OPS) is providing support to a large majority of students in Omaha who are part of federally protected classes based on race, color, and national origin. While the City of Omaha has a White population that makes up 69% of all residents, only 28% of all students who attend OPS identify as White. Additionally, OPS has a significantly higher percentage of students from low to moderate income households, and the majority of English language learners across all four districts.

When mapping public schools by Nebraska's state performance guidelines, all schools rated as "excellent" are found to the west of 132nd Street. The majority of schools rated "great" or "good" are found west of 72nd Street. The majority of schools east of 72nd Street are categorized as "needs improvement." Households living east of 72nd Street have less access to proficient schools. Because the majority of Non-White households are located east of 72nd Street, there is less access to proficient schools for minority families in Omaha.

Contributing factors to access to disparities in access to education include:

- Segregation
- Location of proficient schools and school assignment policies
- Distribution of resources across school districts

Employment

Analysis of HUD data regarding employment focused on engagement in the labor market and proximity to jobs. According to HUD's Labor Market Index, which measures education attainment and employment rates, Black and Hispanic residents have the lowest index scores in the jurisdiction. Black households also have the lowest job proximity index scores in the Omaha area. Although HUD maps show fairly equal distribution of job proximity index scores across the city, maps based on Census data, the location of major employers, and highest areas of unemployment indicate a mismatch between unemployed residents and corridors of employment.

R/ECAP Census tracts have rates of unemployment that are three times as high as the county average indicating barriers to employment for protected classes. Community input and local data indicates a lack of access to proficient education. This lack of job skills and training may contribute to the high unemployment rates of minority residents living east of 42nd Street. Additionally, a concern of lack of access to reliable transportation was commonly expressed throughout the community engagement process.

Additional contributing factors to disparities in access to employment include:

- Location of employers
- Lack of private investment in specific neighborhoods
- Lack of public investment in specific neighborhoods including services and amenities

Transportation

HUD's indexes for low transportation costs and transit trips are limited by the limitations of the population included in the data. A more accurate representation of access to transportation was created using federal and local data combined with Metro Transit data. There is a need for more transportation from Northeast and Southeast Omaha to areas of major employment in Southwest Omaha. Increasing hours and frequency and/or types of public transportation would help low to moderate income residents who depend on using public transportation for employment. Multiple comments were made in the community participation process expressing a need for more affordable housing along public transportation routes.

Another commonly expressed concern by community members is a lack of access to transportation for the disability community. This was mentioned as a major barrier to accessing other opportunities and resources. Challenges in affordable and accessible transportation for persons with disabilities impact their access to work, school, medical facilities, places of worship, and social activities. Lack of sidewalks and the condition of sidewalks was also mentioned as an obstacle to reaching public transportation.

Contributing factors to disparities in access to transportation:

- Availability, type, frequency, and reliability of public transportation

Access to Low Poverty Neighborhoods

When comparing HUD and local data regarding protected classes in Omaha, Black, Hispanic, and Native American households have the least access to low poverty neighborhoods. These minority households are more likely to live in areas with higher poverty rates. Segregation and a lack of affordable and publicly supported housing to west of 72nd Street contribute to the disparities in access to low poverty neighborhoods for Non-White households.

The need for more diverse and mixed income neighborhoods was expressed in the community participation process. An activity held during community open houses across the city included a station where residents selected solutions for housing issues

identified in their area. The “creation of more mixed income neighborhoods” was a solution that residents chose to solve the following issues:

- Concentration of racial and ethnic minorities in low income communities
- Discrimination/institutional racism
- High quality schools not equally distributed throughout the region

Additional contributing factors in disparities in access to low poverty neighborhoods:

- Location and type of affordable housing
- Access to financial services
- Private discrimination
- Lack of access due to high housing costs
- Impediments to mobility
- Lending discrimination
- Lack of resources for fair housing agencies and organizations

Access to Environmentally Healthy Neighborhoods

HUD data for access to environmentally healthy neighborhoods was limited to federal data focused on air quality. Local data and data provided by the Environmental Protection Agency (EPA) were used to provide a more accurate analysis. Exposure to lead hazards, poor housing maintenance, and asthma triggers are significantly higher in eastern Omaha where there is older housing stock, fewer families with resources with which to maintain their homes, less education about home maintenance, fewer land lords engaged in active property maintenance, more industries, more transportation routes, and a more densely built environment. These same areas contain Omaha’s R/ECAPs, and highest concentrations of minority households.

Throughout the community engagement process, concerns for environmental issues related to aging housing stock were mentioned. Regional fair housing survey respondents listed the concerns with environmental health and housing including: insects, radon, mold, noise, and lead.

Contributing factors to disparities in access to environmentally healthy neighborhoods:

- Location of environmental health hazards
- Environmental concerns associated with deteriorated and abandoned properties

Disproportionate Housing Needs

An analysis of household demographics and disproportionate housing needs shows Hispanic, Black, and Native American households experience the most housing and severe housing issues. HUD’s definition of “housing problems” includes: incomplete

kitchen facilities, incomplete plumbing facilities, more than one person per room, and cost burden greater than 30% of household income. Housing problems defined as “severe” include the same issues of incomplete facilities and overcrowding, but include cost burden greater than 50% of the household income. Families with more than five people and households that are comprised of multiple unrelated residents have the most issues with overcrowding.

Local data and information collected through public participation suggests a need for the following types of housing:

- Rental units considered affordable (30% or less) for households with an annual income of less than \$19,000
- Affordable housing for larger families
- Affordable accessible housing for the disability community and aging residents
- Affordable and mixed income multi-family housing

Publicly Supported Housing Analysis

Omaha Housing Authority (OHA) and Douglas County Housing Authority (DCHA) provided analysis regarding publicly supported housing in Omaha. According to OHA, Hispanic households and Asian/Pacific Islander households are under-served in every publicly supported housing program. Black and Hispanic households represent a disproportionate share of Omaha’s low income households. Both Housing Authorities mentioned a need for more publicly supported housing for large families and for more publicly supported housing units that are accessible for persons with disabilities. Transportation is listed as a challenge for many persons living in publicly supported housing by both OHA and DCHA. There is also a need for more affordable in-home or community based services for persons with disabilities living in public housing.

A lack of publicly supported housing west of 72nd Street was mentioned throughout the community engagement process. Although only a few publicly housing developments are located within the R/ECAP Census tracts, they tend to be very large developments. Cultural attitudes regarding race and poverty and a lack of participation from landlords west of 72nd Street are challenges to providing more options to increasing the number of Housing Choice Voucher participants and other publicly supported housing programs in high opportunity areas.

Contributing factors/barriers to publicly supported housing:

- Lack of community revitalization strategies
- Lack of private investment in specific neighborhoods
- Deteriorated and abandoned properties

- Source of income discrimination
- Lack of access to opportunity due to high housing costs
- Impediments to mobility
- Quality of affordable housing information programs
- Access to publicly supported housing for persons with disabilities
- Lack of affordable accessible housing in a range of sizes
- Lack of affordable in-home or community based services for persons with disabilities
- Lack of meaningful language access

Disability and Access

Analysis of disability and access was completed by City of Omaha Human Rights and Relations staff. As mentioned in previous sections, concerns regarding lack of access to opportunities and disproportionate housing needs for the disability community were also commonly mentioned at events and in activities related to public participation. A major barrier for persons with disabilities is housing insecurity. Many people with disabilities depend on limited/fixed incomes. There is an insufficient supply of affordable housing, especially rental units for households making less than \$19,000 annually. Current standards for Supplemental Security Income (SSI) make securing accessible affordable housing difficult. Over 30% of the persons with disabilities in our community reside in the North Omaha and South Omaha area where most of the public housing, Project Based Section 8, and other Multi-family and Housing Choice Voucher (HCV) Program housing are located.

Community input and stakeholder meetings suggest a need for more programs to provide accessibility modifications for persons with disabilities and more transportation options for the disability community.

Contributing factors/barriers to Disability and Access:

- Source of income discrimination
- Access to transportation
- Location of accessible housing
- Occupancy codes and restrictions
- Lack access to opportunity due to high housing costs
- Lack of affordable accessible housing in a range of units and sizes
- Lack of assistance for housing accessibility modifications
- Lack of affordable in-home or community-based services
- Access to publicly supported housing

COUNCIL BLUFFS

The City of Council Bluffs and Municipal Housing Agency (MHA) worked together to complete the City's AFH. In order to identify contributing factors, the City and MHA analyzed each HUD contributing factor as it relates to Council Bluffs and its citizens. From there, the list was prioritized based on research findings and public feedback. Together, the following fair housing issues and corresponding contributing factors were identified:

Segregation

1. Cultural attitudes regarding race and poverty
2. Access to publicly supported housing for persons with disabilities
3. Lack of assistance for transitioning from institutional settings to integrated housing

Disparities in Access to Opportunity: Access to Low Poverty Neighborhoods

1. Location and type of affordable housing
2. Lack of access to opportunity due to high housing costs
3. Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
4. Lack of resources for fair housing agencies and organizations

Disparities in Access to Opportunity: Access to Environmentally Healthy Neighborhoods

1. Location of employers
2. The availability, type, frequency and reliability of public transportation

Disparities in Access to Opportunity: Access to Employment

1. Location of employers
2. The availability, type, frequency and reliability of public transportation
3. Inaccessible buildings, sidewalks, pedestrian crossings or other infrastructure

Disproportionate Housing Needs

1. Lack of affordable, accessible housing in a range of unit sizes
2. The availability of affordable units in a range of sizes
3. Impediments to mobility
4. Private Discrimination
5. Lack of local or regional cooperation

Publicly Supported Housing

1. Lack of affordable, accessible housing in a range of unit sizes
2. The availability of affordable units in a range of sizes

Disability and Access

1. Lack of assistance for transitioning from institutional settings to integrated housing
2. The availability of affordable units in a range of sizes
3. Impediments to mobility
4. Private Discrimination
5. Source of income discrimination
6. Lack of local public fair housing enforcement

Fair Housing Enforcement, Outreach Capacity and Resources

1. Lack of local public fair housing enforcement
2. Lack of resources for fair housing agencies and organizations

BELLEVUE

Demographics

- According to 2015 ACS, total population of 54,067; this is an 8% increase from 2010.
- Minorities continue to make up similar percentages through the past 20 years, while the Hispanic population has grown 9% to make up almost 13% of the total population.
- While the Hispanic population has grown, the overall Limited English Proficiency (LEP) has only increased to 4%.

Segregation/Integration

- Dissimilarity index values indicated low segregation overall in Bellevue.
- Slightly higher percentage of Hispanic residents live in central and north central Bellevue. Maps indicated segregation of Hispanics north of Harrison Avenue in Omaha/Douglas County.
- Overall, Bellevue has higher percentage of homeowner compared to renters. When looking at race, more White households are homeowners, while Black, Hispanic, Asian, and Native American are renters.

Education

- Index Values indicate no particular protected class has excessively better or worse access to education.
- Non-Hispanic, Black residents living below the poverty line school proficiency index is significantly lower than Black total population index value.
- The total population of Native American, Non-Hispanic students have a lower school proficiency index than those living below the poverty line.

Employment

- Native Americans are faced with living the furthest distance away from employment centers.
- Limited public transportation options in Bellevue discourage those without personal transportation from living a significant distance away from employment centers.
- Bellevue has relatively high labor market index values across all races.
- Bellevue's population tends to be more engaged with the labor market.

Transportation

- Due to limited availability of public transportation, Bellevue residents face higher transportation costs.
- Bellevue residents have a mean travel time to work of 20.7 minutes.

Access to Low Poverty Neighborhoods

- Overall, Bellevue residents have a higher likelihood of living in neighborhoods of lower poverty.
- The Black Non-Hispanic population living below the poverty line have a significantly higher likelihood of living in neighborhoods with higher concentrations of poverty.

Disproportionate Housing Needs

- Although Native American households make up the smallest percentage of Bellevue households, they experience significantly higher rates of housing problems and severe housing cost burden compared to other race and ethnicities.

Publically Supported Housing

- Bellevue is faced with a lack of publicly supported housing

Disability and Access Analysis

- Due to the age of housing in Bellevue, it is reasonable to conclude that the majority of housing units are not accessible including publicly supported housing.
- Of the 21,745 units, 17,230 units were built prior to 1991 and fair housing requirements.

Part V Fair Housing Goals

Below the goals for the NE-IA Region and each participating jurisdiction are listed. Detailed information on the goal setting process is located in Section VI of the AFH under Fair Housing Goals and Priorities.

Goals NE-IA Region

1. Increase accessibility of public transportation through education, outreach, and advocacy:

- Work with the Regional Coordinated Transit Committee (CTC) Education and Advocacy committee to provide education and increase outreach regarding methods of public transportation, ride sharing services, and accessibility.
- Assist Metro Area Planning Agency (MAPA) in developing and disseminating a resource guide with options and/or requirements for specific transit programs.
- Partner and advocate for supportive land use policies regarding transportation.

2. Expand mobility for housing choice voucher holders in high opportunity areas:

- Increase the quality of outreach to landlords about housing choice programs.
- Create a resource for voucher holders to understand and evaluate options that meet their needs.
- Evaluate policies for setting payment standards between regional housing authorities.

3. Increase the supply of housing units for residents who are disabled and/or elderly across the region with a special focus on high opportunity areas:

- Petition the states of Iowa and Nebraska to incentivize development of affordable and accessible units in housing projects that receive state funding.
- Housing and Community Development Divisions will advocate for providing an allotment of housing rehab funds for accessibility modifications.
- Jurisdictions with HOME Investment Partnership Program (HOME) funds will revise HOME applications to include criteria or the accumulation of points for development of accessible affordable housing in areas of high opportunity.
- Regional partners will work to amend building codes to include universal design standards.

4. Develop public-private partnerships with Housing Development divisions, the business community, and philanthropic groups to increase private development in R/ECAP, low-income, and high-poverty neighborhoods:

- Create partnerships with the Greater Omaha Chamber of Commerce and philanthropic groups
- Find a currently established group to focus energy and resources to create an asset inventory on a neighborhood level and a regional economic development level.
- Find opportunities to regionally coordinate to apply for economic development opportunities.

5. Improve the environmental health of neighborhoods (with a focus on those in areas identified as meeting the requirements for federal assistance) by addressing deteriorated and abandoned properties, walkability, and transportation options:

- Research best practices, evaluate programs, and make recommendations to improve the process currently in place to address properties with code violations.
- Increase awareness of programs and agencies that may assist with hazard abatement.
- Promote information on how and where to report code violations.

6. Advocate for partnerships and best practices in regards to use of funds to increase supportive services and help create housing stability in publicly supported housing throughout the region:

- Public housing agencies from the region will attend meetings among human service providers regarding supportive services.
- Evaluate opportunities for housing agencies to partner with regional service providers in moving resources to supportive services to increase stability for public housing residents.
- Attend Metro Area Continuum of Care meetings to collaborate and share information.

7. Creation of a Task Force to help promote fair housing goals, increase access to opportunity for protected classes, and prevent further inequity in housing:

- Advocate, educate, and disseminate fair housing information.
- Ensure the completion of Analysis of Impediments (AI) goals in a timely manner.

- Cost-benefit analysis of current regional policies impacting housing and development.

8. Provide a central fair housing resource to support education and access to opportunities in the region.

- Create a dynamic website where regional residents can find updates on goals to the community, the AI initiative, information about fair housing resources, and links to partnering organization and services.
- Work with the Mayor's Fair Housing advisory board to create a marketing plan to promote the fair housing website across the city.

Goals City of Omaha

1. Increase the amount of affordable housing stock in high opportunity areas in Omaha:

- Collaborate with the Heartland 2050 Housing Affordability and Funding working group to promote education and advocacy for affordable housing across the city.
- Evaluate current incentives for the development of affordable housing and look for opportunities to expand and increase incentives.
- Create a mechanism for prioritizing fair and affordable housing elements in the proposal and selection process of projects requesting federal and state funding through City Planning Department programs.

2. Outreach to Omaha's refugee and new immigrant populations with tools that provide information regarding local rights and duties of landlords and tenant rights and responsibilities in order to help prevent against private discrimination:

- Creation of brochures regarding landlord tenant laws, rights, and responsibilities and contact information for reporting discrimination in the six most widely spoken languages in addition to English for the region.
- Create a video on landlord tenant rights and responsibilities for those who may not be able to read in their native language.
- Conduct workshops presenting landlord/tenant information, rights and responsibilities to multiple refugee and new immigrant populations.

3. Provide opportunities for community conversations on topics related to the history and future of segregation and integration in Omaha:

- Create opportunities for community-led events focused on stigma and stereotypes about race and poverty, redlining, and neighborhood revitalization.
- Seek opportunities to promote public art installations that reflecting the history of segregation and/or the conversations held about integration and moving forward together as a community.
- Meet with City Council members and provide information on the potential impacts of Sanitary Improvement District (SID) annexation on segregation and accessibility.
- Work to increase neighborhood capacity and support neighborhood-based planning

4. Increasing awareness and access for the disability and LEP communities in all City of Omaha programs and communications:

- Address communication for Limited English Proficiency (LEP) communities and Americans with Disabilities Act (ADA) accessibility statements for all City communications and public engagement.
- Training for all city managers on available resources for translation and ADA accommodations provided through the Human Rights and Relations Department.
- Work to identify liaisons in the community that can assist the City in reaching out to the LEP community for events and with program opportunities.

5. Provide mobility and/or affordable housing options for elderly and disabled populations who currently live in homes with multiple floors but cannot access or use amenities while simultaneously opening up opportunities for large family housing to serve refugee and new immigrant populations:

- Identify/find/recruit development partners interested in investing in affordable aging/disabled housing.
- Find a non-profit partner to help facilitate education on benefits of living in housing designed to provide amenities specifically for the aging/disabled population.
- Work with non-profit partners to prepare refugee/new immigrant families for home ownership and/or renting homes that become available.

6. Increase funding for programs focused on demolition or rehabilitation of abandoned buildings and the sustainable management and development of vacant lots in eastern Omaha:

- Create a team including the City of Omaha, Omaha Municipal Land Bank, and Habitat for Humanity who can create a strategic plan and leverage funds to address abandoned and vacant properties and improve the quality of life in neighborhoods in R/ECAP areas.
- Work to diversify funding for rehabilitation of homes and vacant lots and use current redevelopment plans to identify places for projects/strategic use of funds to improve neighborhoods in R/ECAP areas.
- Identify best practices for sustainable and low maintenance vacant lot management in R/ECAP areas.
- Explore funding sources to help persons who qualify as 60% or less of Average Median Income (AMI) who live in R/ECAP areas maintain their homes and avoid code violations.

7. Reduce barriers to infill development in R/ECAP communities:

- Research infill development best practices for cities with similar size and demographics.
- Identify and address barriers through research and design of local codes.
- Implement zoning practices that meet the needs of neighborhoods and encourage infill.

8. Create an effective communication network between City Departments and the community:

- Create a new public engagement strategy for Housing and Community Development to disseminate and collect information from residents/neighborhoods/stakeholders.
- Create and distribute presentations on AI data to share with neighborhood and community groups.
- Hold workshops for the public on city departments and processes.

Goals Douglas County Housing Authority (DCHA):

1. Promote, educate, and advocate for building new housing developments in high opportunity areas within a range of sizes and for a variety of household types and levels of income.

- Educate private landlords, developers, public entities, and network with service agencies as opportunities present. (ongoing)
- Develop informational materials for local governments and community organizations to use to for public education regarding the need for affordable housing. (by 1/2019)
- Coordinate with private developers and partnering agencies for “mainstream housing” vouchers for persons with disabilities (nonelderly). (by 10/2018)
- Research housing trust funds (i.e. Oregon) to determine feasibility of incentive housing for HCV recipients (by 6/2019)

2. Promote and advocate for additional transportation options in currently underserved (transportation) areas of the county (i.e. Western Douglas County). (on going)

- Request a seat and attend transportation committee meetings (by 7/2018).
- Develop a directory of current case management, social service providers, churches and transportation grant holders for underserved (transportation)(by 6/2019)

Goals Council Bluffs

1. Increase quality and number of affordable housing units for a variety of household types.

- NeighborWorks Home Solutions becomes Community-Based Development Organization (CBDO) by December 2018
- Advocate and prioritize funding for seniors and affordable housing along transit corridors, and in close proximity to health care, retail, and recreational facilities (Ongoing)
- Provide emergency assistance for the immediate repair and correction of hazardous housing conditions, which represent a threat to the health, safety, and well-being of the occupant(s) (Ongoing)

- Target the use of CDBG funds to support economically viable rehabilitation in homes for low-income members of protected classes to enable them to remain in their properties (Ongoing).
 - Increase the number of housing options with more than 3 bedrooms by 5% in the next 10
 - Adopt a formal reasonable accommodation policy for housing that informs and provides clear direction to persons with disabilities on the process for making a reasonable accommodation by 2020.
2. Promote opportunities to move homeless into stable permanent housing.
- Increase the number of permanent supporting housing options for the chronically homeless by 5% in 10 years
 - Increase the number of handicap accessible permanent supportive housing options for the chronically homeless by 3% in 5 years.
 - Continue support of nonprofit agencies providing homeless services in Council Bluffs (Ongoing)
3. Improve the environmental health of Council Bluffs.
- Return vacant and blighted properties back into productive use by analyzing disposition policy and recommending changes and applying for EPA Brownfield grants (Ongoing)
 - Explore funding opportunities for Healthy Homes program to protect property occupants from environmental hazards including lead-based paint and improve energy efficiency. Lead safe and mold free (July 2019)
 - Work to reduce flooding within Council Bluffs by exploring new policies and practices around stormwater management (Ongoing)
 - Attend the 2018 National Lead and Healthy Housing Conference
4. Increase knowledge of local assistance programs and fair housing laws to disabled, limited English, and high poverty populations including but not limited to private businesses, nonprofit assistance and City programs.
- Revise and expand Language Access Plan (LAP) by December 2019
 - Expand fair housing outreach, education and enforcement activities and continue support for housing counseling agencies to provide tenant counseling to enable low-income households to remain in their rental units (Ongoing)

- Establish a fair housing education FAQ for landlords, realtors, and lenders and continue to focus programs and activities to prevent housing foreclosure and displacement (December 2018)
 - Utilize various media outlets to inform the public about issues related to fair housing programs and reports
5. Work with local employers to increase the number of quality jobs.
- Adopt economic development strategies that target development, retention and expansion of firms and industries that provide living wages (December 2018)
 - Provide support to nonprofit groups to assist low-income families in accessing programs to increase household financial stability (Ongoing)
 - Assist Advance Southwest Iowa Corporation with their business assistance, retention, expansion and new to market business programs (Ongoing)
 - Work with Iowa Western Community College for technical training programs geared toward specific jobs
6. Utilize outside funding sources to better leverage resources for local community development projects.
- Provide leveraged financing and recommend allocating federal funding and Low Income Housing Tax Credits (LIHTC) for mixed-income projects that are consistent and support redevelopment plans in priority areas (Ongoing)
 - Establish ongoing meetings with the state of Iowa to discuss housing policy and other issues related to community development (June 2018)
 - Revise footprint of City's Neighborhood Revitalization Strategy Area to meet changes in demographics (December 2019)
 - Advocate the Council Bluffs Housing Trust Fund to provide funding at a higher percentage to disabled persons and low-income persons (June 2018)
7. Improve and increase Council Bluffs transportation options including public transit, trails and sidewalks to benefit all citizens of Council Bluffs.
- Form partnerships between local governments and private employers to develop transportation options that connect low income and protected populations with job opportunities
 - Adopt and implement complementary mobility options such as walking, biking car sharing
 - Plan and execute a Bus Ridership program for Human Services/Resource Professionals

- Provide information to the Southwest Iowa Transportation Authority and other transportation providers regarding potential bus routes that would meet current needs within the CB community

Goals CBMHA

1. Expand mobility for housing choice voucher holders in high opportunity areas.
 - Hold a stakeholder meeting with local landlords and housing choice voucher program staff to discuss what type of information would be most helpful to have and share with landlords (December 2018).
 - Create a landlord survey in order to collect data about participation in the housing choice voucher program including why landlords do or do not participate in the program and what incentivizes or prevents their participation (June 2019).
 - Research best practices in housing choice programs for cities similar to the Omaha region (December 2019).
 - Present survey results and best practices at annual event for landlords (June 2020).
2. Advocate for partnerships and best practices in regards to use of funds to increase supportive services and help create housing stability in publicly supported housing.
 - Municipal Housing Agency will maintain partnership with Human Services Advisory Council (2018- 2023).
 - Municipal Housing Agency will work closely with local human services agencies to provide tenants with contact information of services they may be able to utilize (2018- 2023).
 - Municipal Housing Agency will work to create a guidebook of local human services agencies to provide tenants/ participants with information of services they may be able to utilize (December 2018).
 - Municipal Housing Agency will develop life skills curriculum and teach classes in the area of budgeting, housekeeping, and other life skills areas (December 2018).
 - Municipal Housing Agency will teach classes in the area of budgeting, housekeeping and other life skills (2018-2023).
 - Municipal Housing Agency will develop relationships with outside entities to provide information and resources for tenants in the area of life skills (2018-2023).

3. Renovate current units to make more accessible to tenants.

- Municipal Housing Agency will continue to apply for grant money through the Council Bluffs Housing Trust fund to renovate current units to make them more accessible (2018- 2023).
- Municipal Housing Agency will work with local contractors to provide renovations to current units with money gained through Housing Trust Fund grant (2018- 2023).
- Municipal Housing Agency will work tenants to meet needs through Reasonable Accommodations to renovate units to make them more accessible (2018- 2023).

Goals Bellevue

1. Increase affordable housing opportunities to expand housing choice by increasing quality and quantity of affordable housing units and the number of participating landlords in the jurisdiction.
 - Research partners and funding sources to conduct a housing market study for the community and identify opportunities to use the study to enhance development and developer partnerships
 - Review possible developer incentives to increase development of affordable housing and meet with necessary partners to develop, prepare and adopt incentives.
 - Determine prospects to increase the available funding and programs for housing rehabilitations programs in the community.
 - Work with City officials and departments to review current criteria for determining city project need to include accessibility and housing issues.
2. Identify opportunities to safeguard current and future zoning ordinances to encourage the development of affordable housing stock as well as utilize occupancy requirements that do not hinder fair housing choice.
 - Work with local planning department to review current land zoning and develop proposal to increase multi-family zoning.
 - Increase infill development opportunities by reviewing regulations and best practices to identify possible changes to the current regulations and develop proposals.

- Research opportunities to increase the percentage of newly constructed housing units that are affordable and accessible to people with disabilities.
3. Provide opportunities to alter the perceptions of community exclusion and diffuse opposition to affordable housing through knowledge and education.
 - Research proactive marketing strategies to enhance community image and identify community stakeholders to assist with development of community strategies to propel movement forward.
 - Identify possible funding sources to assist with marketing strategies specific for the community.
 - Identify prospects to address Bellevue's aging infrastructure and necessary updates to ensure all residents have accessibility to services.
 - Work with the City of Bellevue ADA Committee to review current status of ADA Transition plan and infrastructure needs in the community along with identifying funding sources for assistance.
 - Develop programs and assistance to address housing accessibility modification needs.
 4. Increase homeownership opportunities through financial literacy and promoting equitable access to credit and home lending.
 - Identify partners, specifically lending agencies, to assist with reviewing current lending concerns to identify areas of opportunities for education and assistance.
 - Enhance educational materials and expand distribution and availability of materials.
 5. Improve knowledge and access to services, programs, and assistance for the disability community and the LEP community.
 - Conduct asset mapping project to locally available housing and public services.
 - Develop innovative ways to highlight existing programs available in Bellevue and review programs offered in the metro area to determine the feasibility and possibility of offering the programs in Bellevue and Sarpy County.
 - Identify community partners and host meetings to discuss plans to highlight current programs and possibility of future programs.

6. Increase the overall knowledge and understanding of fair housing with the community's developers, real estate professionals, financial institutions, elected officials and residents.
 - Identify interested partners to facilitate fair housing workshops for landlords and housing providers
 - Share and distribute fair housing information for renters.
 - Work with local multi-family housing providers to provide information and education about fair housing to managements officials and tenants.

Goals BHA

1. Work to change community perceptions of opposition and community exclusion.
 - Determine the feasibility of adding source of income as a protected class and research other community best practices.
 - Assess the community and elected officials buy-in for the addition of a protected class to prevent discrimination in housing choice.
2. Develop access to publicly supported housing for all residents.
 - Review and develop a Limited English Proficiency Plan with assistance for other community organizations and stakeholders.
 - Review housing needs compared to make p of the waiting list to determine need for accessible units and draft proposal to make necessary modification.
3. Improve knowledge and access to services, programs, and assistance for the disability community and the LEP community.
 - Conduct asset mapping project to locally available housing and public services.
 - Develop innovative ways to highlight existing programs available in Bellevue and review programs offered in the metro area to determine the feasibility and possibility of offering the programs in Bellevue and Sarpy County.
 - Identify community partners and host meetings to discuss plans to highlight current programs and possibility of future programs.

- Review best practices and options for admissions and wait list policies and implements and proposed changes.
- Assist with implementation of a housing navigator program and research additional funding sources for continuation of the program.

SECTION III.

Community Participation Process

Section III. Community Participation Process

HUD requests information from the community engagement period to be organized into four parts:

Part I

Outreach Activities and Methods of Engagement

Part II

Community Organizations Consulted

Part III

Evaluation of Community Participation

Part IV

Summary of Comments and Participation

Part I Outreach Activities and Methods of Engagement

The Cities of Omaha, Council Bluffs, and Bellevue, Council Bluffs Municipal Housing Agency, Bellevue Housing Authority, Omaha Housing Authority, and Douglas County Housing Authority, partnered in the public participation process. As entitlement entities, the partnership was mandated by HUD to complete a robust community engagement process for the Assessment of Furthering Fair Housing. The public participation process involved extensive conversations with multiple groups and individuals regarding the disparity in opportunities for all protected classes as determined by HUD. Multiple methods were used to engage various stakeholders and community members in an effort to be inclusive of people in all protected classes.

A number of government agencies, nonprofit organizations, philanthropic foundations, and other stakeholders across the Omaha-Metro Area continue to work to educate, enforce, and support fair housing activities. Fair housing advocates in the region address inequity in issues related to housing including historical patterns of segregation and ongoing housing discrimination by increasing access to opportunity.

Community partners collaborated with Metropolitan Area Planning Agency (MAPA) on a public engagement strategy to achieve public participation goals. MAPA assisted in facilitating a number of stakeholder meetings, public open houses, public forums and community events. MAPA identified stakeholders and advocacy groups in specific categories related to fair housing. These included: Housing problems and disparities, access to education, employment, transportation, environmentally healthy neighborhoods, disability, and issues concerning publicly supported housing. Meetings were held at MAPA's main offices, libraries, community, community centers, and conference centers.

The stakeholder meetings identified fair housing issues facing the region and developed strategies to mitigate those problems. The majority of these meetings included a presentation on the AFFH process, fair housing history, the content requirement of the AFFH document, setting fair housing priorities, and community goals. Federal and local data was shared with attendees to inform discussions.

Presentations were followed by breakout sessions and reflection activities. Attendees participated in discussions regarding prevalent issues, contributing factors, and strategies.

Small groups were asked to answer the following questions:

1. Identify the most prevalent fair housing issue in the region
2. Identify what factors contribute to fair housing issues/discrimination
3. How would you address these problems and where are the protected classes that are impacted by these issues?

Answers from small groups were reported out in order to identify common themes. A facilitated discussion followed in order to determine prevalent housing issues, contributing factors, and strategies from each stakeholder or community group.

Stakeholder meetings include:

Non-profit/Community Housing Advocacy Groups	June 15, 2017
Disability Community	June 15, 2017
Development Community	June 16, 2017
Transportation Group	June 28, 2017
Omaha LGBTQ Group	July 19, 2017
Latino Community	July 21, 2017
Omaha Businesses	August 4, 2017
North Omaha Stakeholders	September 9, 2017
Lending Institutions	June 16, 2017
University of Nebraska Omaha Service Learning Class	September 13, 2017
Bellevue Housing Developers	October 5, 2017
LGBTQ Focus Group	July 19, 2017
Landlord Outreach Breakfast	June 27, 2017
Council Bluffs Development Community	July 19, 2017
Bellevue Public Meeting	September 15, 2017
Bellevue Public Schools	September 15, 2017
Minority Homeownership Committee	August 11, 2017
24 th Street Corridor Alliance	August 14, 2017
Empowerment Network	September 8, 2017

Open houses were scheduled in locations across the region to provide convenient and meaningful opportunities for residents to give their feedback on fair housing. All locations for opens houses were ADA accessible. A station with activities for kids was included for participants who may need to bring their children to the open house.

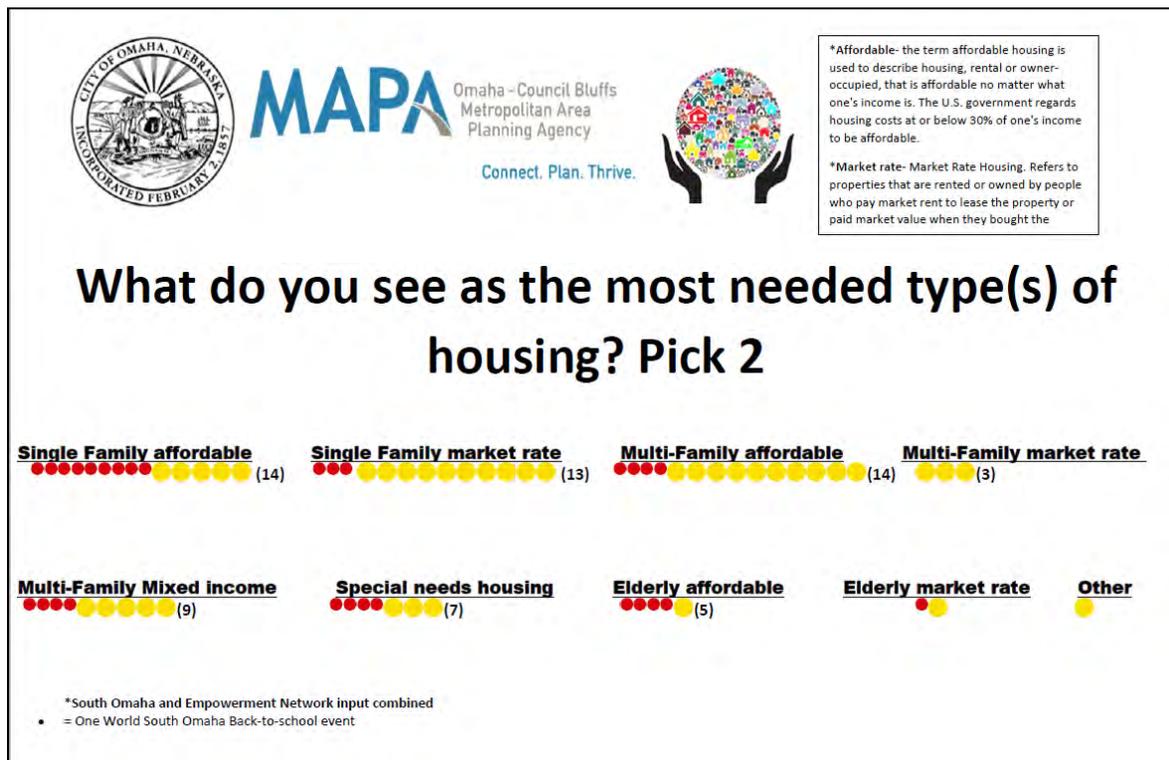
Open house format:

1. Residents were greeted when entering and asked to sign in to receive updates on the progress of the project. They were also given a handout with information about the Regional Fair Housing Survey.
2. The purpose of the first station was to explain the AFFH process. The station included maps focused on demographics, housing burden, employment centers, and public transit lines. Each station had program partnership staff available to answer questions or provide information on maps and the AFFH process.
3. The second station, “My Dream of Omaha”, was created to identify desirable locations for housing and conditions that make them desirable. Residents were able to indicate on a map where they would live if they could live anywhere in the region. Attendees were encouraged to provide written comments on why they selected that location in the area. If the location selected was their current neighborhood, it was indicated with a heart on the map.
4. The third station was set up as an investment game. Attendees were given five chips representing federal housing dollars. Six jars were provided, each representing a strategy to combat a different housing issue. Participants placed chips in the jars indicating how they would invest in strategies to overcome housing issues in the region.
5. The fourth station addressed overcoming barriers to access to opportunity. The station included a list of the largest issues facing the region and potential solutions to address those issues (previously identified by stakeholder meetings). Residents matched solutions with the issue they found most important. Attendees were encouraged to write down additional solutions and issues.
6. The fifth station encouraged participants to indicate the top two types of housing they thought was the most needed in the region. A list was provided that included the following: Single Family Affordable, Single Family Market Rate, Multifamily Affordable, Multifamily Market Rate, Multifamily Mixed Income, Special Needs Housing, Elderly Affordable, Elderly Market Rate, and Other
7. Residents concluded their visit with “My Story” station. This was an opportunity for them to share their housing experiences. Attendees could choose to provide a

of doing voice recording or filling out a worksheet answering one or more of the following questions:

- How has your neighborhood changed over time: (How has segregation been a part of that change?)
- Share your last experience in finding a home
 1. What were your greatest challenges?
 2. Did you know you have resources available to help you find a home?
- If you could change one thing about your neighborhood or residence, what would that be?
- Share your favorite landlord story, good or bad.

Figure III-1 Example of Data Collected from Community Open House



Source: MAPA AFH Community Engagement Materials

Additional results captured by the stations at community open houses in Omaha are included in Attachment A.

Open House dates were as follows :

Midtown Omaha	July 17, 2017
Southwest Omaha	July 24, 2017
North Omaha	July 27, 2017
Northwest Omaha	August 7, 2017
South Omaha	August 9, 2017
Elkhorn Omaha	September 6, 2017

Outreach efforts included attending and presenting information on the AFFH, handing out flyers or surveys, hosted tables or presentation as panel members.

Community Organization and Group meetings include:

Highland South/Indian Hills Neighborhood	August 26, 2017
Minne Lusa neighborhood Association	September 7, 2017
Binney-Wirt-Spencer Neighborhood Association	September 16, 2017
Bellevue Housing Authority Back To School Handouts	July 18-27, 2017
Village Pointe Farmers Market	September 2, 2017
Kids of the Future Center	August 1, 2017
Community Outreach at Warner Park	July 18, 2017
Deer Park Neighborhood Partners Meeting	June 21, 2017
Midtown Neighborhood Alliance	June 20, 2017
Heartland Pride Parade and Festival	June 17&18, 2017
2017 Visually Impaired community Resource Fair	April 29, 2017
Bellevue Senior Center	August 2, 2017
Aksarben Elmwood Park Neighborhood Association	July 20, 2017
Northwest Neighborhood Alliance Meeting	July 13, 2017
BET Child Care Center	August 4, 2017
Elements Child Care	August 4, 2017
Coordinating Transit Committee Meeting	June 21, 2017

Service Agencies, Advocacy Groups include:

Lutheran Family services	August 24, 2017
Rising View Housing – Bellevue	August 29, 2017
Omaha Public Schools Research Division	September 8, 2017
Omaha PFLAG Meeting	July 13, 2017
Omaha 360	July 26, 2017

One Omaha Advisory Board Meeting	June 19, 2017
Heartland 2050 housing & Development Meeting	April 13, 2017
Refugee Task Force	August 3, 2017
Leaning Community Center of South Omaha	July 12, 2017
Restoration Exchange Omaha	August 3, 2017
Habitat for Humanity	May 22, 2017
Council Bluffs Legal Aid	May 22, 2017
The Center (CB Senior Center)	May 18, 2017
Energy Assistance Service Agency	June 15, 2017
Catholic Charities	May 15, 2017
League of Human Dignity	May 18, 2017
Family Housing Advisory Services	May 18, 2017
Micah House	May 17, 2017
New Visions Homeless Services	May 17, 2017
Heartland Family Services	May 18, 2017

Government Entities include:

Omaha City Council Members	
Bellevue City officials	May 3, 2017
City of Bellevue Administration	May 4&8, 2017
Council Bluffs City Council	May 15, 2017
Pottawattamie County	May 15, 2017
Council Bluffs Human Services Civil Rights Focus Group	July 20, 2017
Bellevue chamber of Commerce	September 13, 2017
Council Bluffs Community Dev. Advisory meeting	June 22, 2017
Council Bluffs Civil Rights Commission	July 20, 2017
Council bluffs Government Focus Group	July 20, 2017
Douglas County Housing Authority Board	March 25, 2017
City of Council Bluffs & MHA	November 15, 2017
City of Bellevue	August 28, 2017
2018 Action Plan Focus Group meeting- Special Needs	June 1, 2017
2018 Action Plan Focus Group meeting – neighborhoods	May 17, 2017
MHA Board of commissioners	June 21, 2017

Forums, Conferences, Workshops include:

Park East/Completely Kids Community Event	August 30, 2017
Realities in Housing Conference	July 18, 2017
Realities in Housing Conference	November 17, 2016
Summit on Poverty	October 21, 2017
Housing Affordability Systems Mapping Workshop	September 20, 2017
Mayor's Youth Advisory Commission	October 12, 2017
Transit Oriented Development Workshop	October 5 & 6, 2017
Latino Conference of the Midwest	August 17, 2017
Inclusive community Table Talk	August 2, 2017
Ability Forum	October 20, 2017
Nebraska Investment Finance Authority (NIFA) Conference	March 12, 2017
Neighborhood USA (NUSA) Conference	May 24-28, 2017
Omaha Table Talks- Housing Discrimination	April 12, 2017
Visually Impaired Community Resource Fair	April 29, 2017
Good Life: Housing Affordability Workshop	February 27, 2018

Individual Interviews:

Concerned Citizen Gabriel Wananka	August 4, 2017
UNO Service Learning Academy Director, Julie Dierberger	August 18, 2017
Omaha Multicultural Welcoming Alliance Director, Ann Marie Kudlacz	February 6, 2018
Early Childhood Services Director, Fawn Taylor	March 1, 2018
Nebraska Urban Indian Health Coalition Director, Donna Polk Community Relations Coordinator, June Bear-Noonan	April 6, 2018

Public Housing Resident meetings:

Four of the partners, Omaha Housing Authority, Douglas County Housing Authority, Municipal Housing Agency (CB) and Bellevue Housing Authority, conducted multiple meetings with their Resident Advisory Boards and public housing residents, to gain input and feedback on their experiences and views on the disparity or burdens of

housing, transportation, employment and environment. Regional surveys were provided as well.

Omaha & Douglas County joint meeting of residents	August 7, 2017
Resident Advisory Board MHA	May 17, June 21, June 28, November 6, 2017
Bellevue PHA residents	September 6, October 16, 2017
MHA Residents	November 6, 2017

Realities in Housing Conference

As part of an ongoing effort to educate lenders, real estate persons, landlords, insurance persons and residents, the Mayor's Fair Housing Advisory Board has facilitated annual conferences to address Fair housing issues. The conference held in 2016 featured an introduction to the AFFH mandate, the history, the process and the expected results. A member of HUD presented the information to 112 real estate, lender and landlords participants. The conference held in 2017 utilized the stakeholder format to gain input and feedback from a set of questions designed for each group as well as eliciting strategies in working toward goals for the region and the jurisdictions. Again, the target invitees were real estate persons, lenders, landlords, insurance persons and residents. There were 127 participants who completed worksheets as well as some completing the regional survey.

Individual Interviews

Many individual interviews were held with representatives of various stakeholder agencies and groups, neighborhoods, and private industries. The interviews helped facilitate further discussion with groups most likely not engaged in the public meeting process or to facilitate additional local knowledge data, experiences and views. There has been ongoing conversations with the purpose of forming partnerships or collaborations to further the goals of this assessment. Additional meetings as well as individual discussions will continue as new connections, concerns and strategies evolve.

Outreach to the R/ECAP Neighborhoods

Recognizing the importance of Omaha's neighborhood associations, city staff presented fair housing information at all Neighborhood Alliance meetings including a presentation at the One Omaha board meeting. Additionally an announcement was sent to all neighborhood leaders requesting an opportunity to present information about the regional fair housing assessment at their association meetings. A specific request was sent to the sixteen neighborhood leaders in the census tracts identified by HUD as R/ECAP tracts (Racially and/or Ethnically Concentrated Areas of Poverty). Six of the sixteen R/ECAP neighborhoods requested and received a presentation on the fair housing initiative.

AFFH Forum

A public forum was held in an open house style format that included stations with visual summaries of the jurisdictional and regional information gathered throughout the various meetings and events. The participants were able to view the various survey results, the comments and strategies derived from the stakeholder and community meetings and various maps that depicted demographics and disparities in employment, transportation, and housing. The goal of the event was to reflect to the public what the Regional partners heard during the period of public engagement and ask attendees to prioritize the most frequently mentioned concerns and issues.

The stations provided at the public forum included the following information:

- Station 1: summary of community engagement results. Comments, feedback, results from worksheets, table discussions, questionnaires, and interactive activities were presented here.
- Station 2: summary of regional survey results. The responses to questions relating to housing, transportation, discrimination and access to amenities were compiled and analyzed using graphs.
- Station 3: summary of contributing factors relevant to each jurisdiction (Omaha, Bellevue, Council Bluffs). Barriers to fair housing were identified through community engagement events, HUD data, and local resources. This station also included definitions HUD provides for fair housing categories and potential barriers.
- Station 4: summary of current regional priorities based on jurisdictions findings and feedback from the community engagement process.
- Station 5: summary of strategies and goals identified through the community engagement process. This station requested attendee input on the strategies and

goals based on the information

- Station 6: opportunity for feedback and questions. Attendees were asked to provide comments and concerns regarding the information. They were also asked to prioritize contributing factors and barriers to accessing opportunities. Staff was available to answer questions at each station.

The second half of the forum provided an opportunity for attendees to hear from speakers who are experts in areas impacted by fair housing issues. Several speakers addressed issues including: disparities in opportunities for the disability community, regional transportation needs and strategies, issues of segregation and integration, sanitary improvement districts, lack of affordable housing through policy, and the history of “redlining”, steering and other discriminatory practices.

Feedback provided by forum attendees can be viewed in Attachment B.

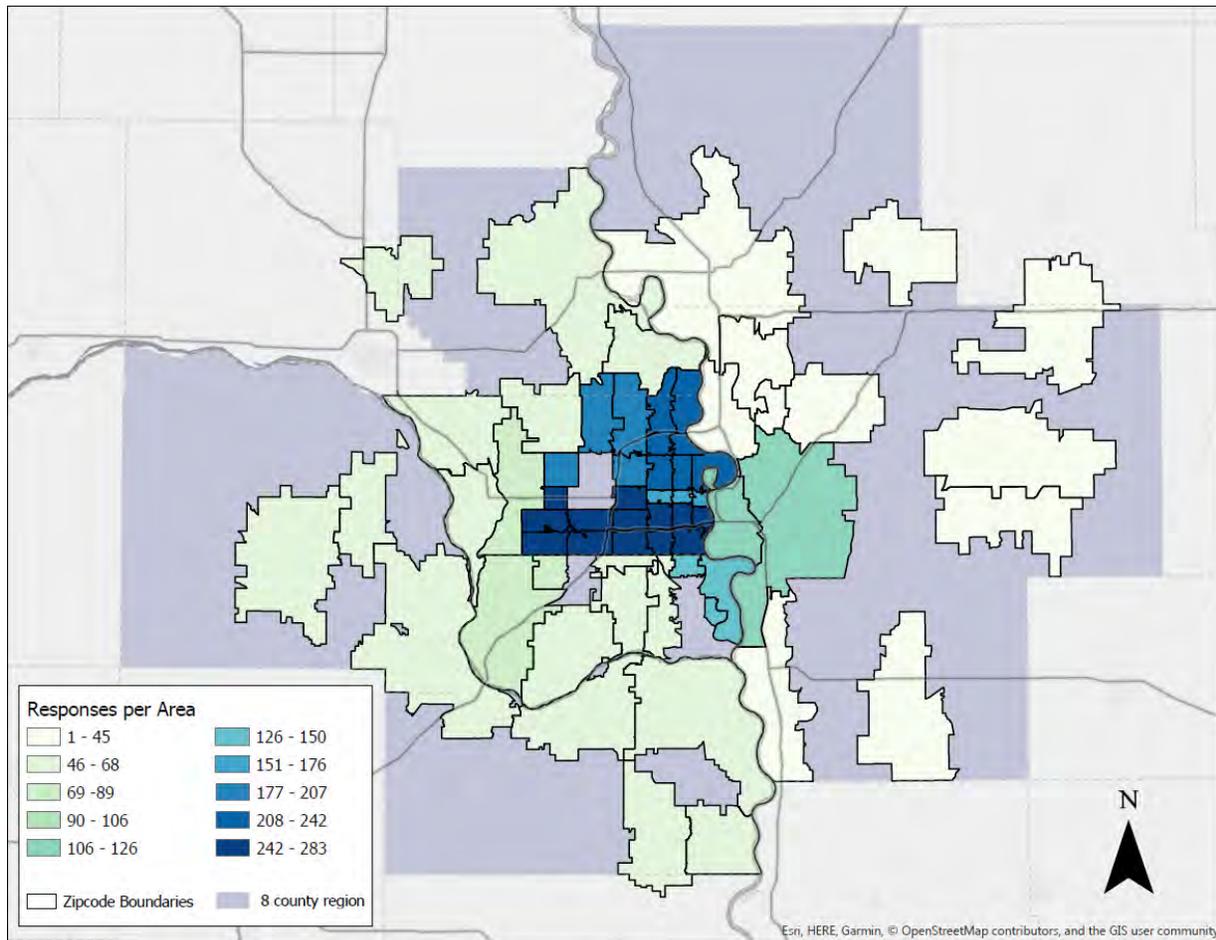
Surveys

To supplement public engagement, several surveys were developed to capture regional opinions on issues related to transportation, education, affordable and accessible housing, employment, and environmental concerns. The four main surveys conducted to identify challenges to fair housing included:

Regional Fair Housing Survey: Covered a range of issues related to fair housing, access to opportunity, and neighborhood health and safety. The survey was translated into over ten languages and distributed online and in paper copies at multiple meetings, events, and locations across the city. Nearly 1,700 responses were collected from residents across the region. The regional survey collected demographic data including information on race and ethnicity, gender, and sexual orientation.

This survey was distributed via websites, emails, hard copy distribution through mailings and was made available digitally as well as hard copy at meetings or accessible on laptops provided. The survey link was emailed to all City and County employees throughout the region. This survey was also distributed to youth groups whose responses were included in the overall survey results. On the AFFH website, the survey was able to be translated in 10 different languages. Specific translations for Spanish and Arabic speaking residents were also distributed in hard copies to organizations and individuals who work in new immigrant and refugee communities.

Figure III-2 Regional Housing Respondents by Zip Code Area



Source: GIS Data, 2014 Census Data

The map above shows Regional Fair Housing Survey respondents by area. The map shows the eight counties included in the regional assessment. Areas were designated based on groups of zip codes and geographic locations. The areas are shaded from dark blue to light green based on the number of survey respondents in the that location. The darkest color blue identifies the greatest number of survey respondents while the lightest green represents the fewest number of respondents. Areas shaded in light purple were included in the region, but did not have any survey participants.

Southwest Omaha had the greatest number of survey respondents at 283, followed by Southeast Omaha at 247 respondents, and Northeast Omaha with 236 respondents. The numbers reflect the participation for the survey from the time the survey opened in early June through the end of September when the survey closed online. There were an additional 77 respondents that submitted paper surveys that were received and entered in the month of October. These surveys are not included in the data reflected in the map

or Table III-1. The table below lists the number of respondents per area and specific zip codes included for each location.

Table III-1 Regional Fair Housing Survey Respondents

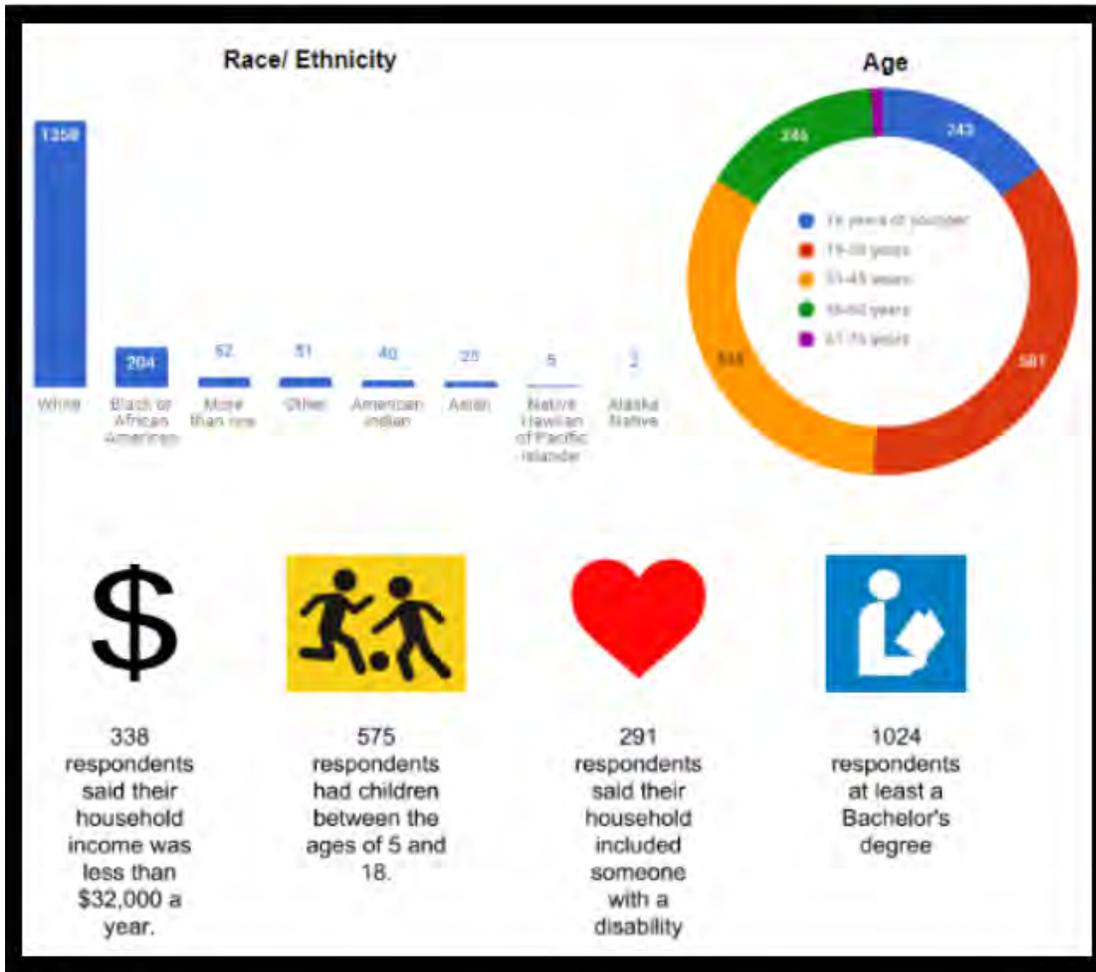
Regional Fair Housing Survey Respondents by Area		
LOCATION IN REGION	# OF RESPONSES	ZIP CODES WITHIN LOCATION
Midtown/Downtown Omaha	155	68102, 68103, 68131, 68132, 68182
Northeast Omaha	236	68104, 68110, 68111, 68112, 68152
Southeast Omaha	247	68105, 68106, 68107, 68108, 68117
Northwest Omaha	178	68116, 68122, 68134, 68142, 68154, 68164
Southwest Omaha	283	68114, 68115, 68118, 68124, 68127, 68130, 68135, 68137, 68144
Far West Omaha	70	68028, 68136, 68138, 68022
Bellevue	136	68005, 68113, 68123, 68147
La Vista Papillion Ralston	66	68046, 68128, 68133, 68133
Rural Nebraska	63	68003, 68007, 68008, 68023, 68037, 68041, 68044, 68048, 68059, 68064, 68066, 68069, 68079, 68413, 68455
Carter Lake and Council Bluffs Iowa	126	51501, 51503, 51510
Rural Iowa	19	51521, 51525, 51526, 51542, 51551, 51555, 51560, 51561, 51563

Source: Regional Fair Housing Survey

Although the second largest group of survey respondents were from Southeast Omaha, where a significant portion of the Metropolitan Area’s Hispanic Community resides, only 84 survey respondents, or 5.11%, identified as Hispanic or Latino. Regionally Hispanic households makes up 8.96% of the population (HUD Table 2, Demographics). This population was under represented in the survey. Additional outreach was conducted in South Omaha, including four open house and stakeholder meetings, in an attempt to get more input from the local Hispanic community.

Additional characteristics of survey respondents are included in the infographic below.

Figure III-2 Regional Survey Respondent Demographics



Source: Regional Fair Housing Survey, Snapshot of Respondents

Additionally, the average median income in the metropolitan statistical areas is \$59,803, but more than half of the Regional Fair Housing Survey respondents listed an annual household income of over \$61,000. Nearly 23% of respondents stated their household earns between \$32,000 and \$61,000, and 22% said their household income was less than \$32,000 per year. 12.63% of all survey respondents are currently living in some type of publicly supported housing or have resided in publicly supported housing in the past. A complete copy of the survey and survey analysis can be viewed in Attachment C.

Additional surveys conducted in order to focus on specific groups or issues regarding the assessment of fair housing included surveys focused on discrimination, experiences of refugee households, and members of the development community.

What is AFFH? Survey: This survey was incorporated into brochures which included information on the AFFH. The brochure was distributed at tables at community events, conferences and workshops by the Human Rights and Relations and Planning Department in 2016-2017. Questions were focused on basic housing issues and experiences of discrimination. This survey was also translated into multiple languages. Shown as Attachment D.

Refugee Housing Survey: Conducted at Lutheran Family services with the aid of translators to refugee families. This abbreviated survey focused on new refugee families and their personal challenges in obtaining housing in Omaha. Shown as Attachment E.

Tax Increment Financing (TIF) Developer Survey: Distributed by Omaha Planning Department staff to a select group of TIF developers to gain feedback on the challenges and benefits of developing affordable housing in Omaha. Data from this survey was incorporated into the goals for increasing the number of affordable units across the region.

Affirmatively Furthering Fair Housing Website

Through the Human Rights and Relations Department of the City of Omaha, an AFFH website was developed to be the repository for all AFFH information throughout the process. The website contained partner information, a calendar of events, summaries of the meetings held, the survey that was translatable, and information on the AFFH process. The site also included links to other organizations and local data. This included a link to the HUD Exchange AFFH Data and Mapping Tool and instructions for how to use the tool.

All public comments that were captured through stakeholder and open house meetings are currently available on the website. The AFFH website will be kept current throughout the process and will then become part of a larger website for Fair Housing resources as determined by a regional goal. The website can be found at AFFH.cityofomaha.org.



Source: affh.cityofomaha.org

Video

A short video was created to inform the public of the AFFH process and invite them to participate in the stakeholder and community meetings. This video was posted on partner websites and the various city websites. The script for the video follows:

“I would like to talk to you about the Affirmatively Furthering Fair Housing Assessment commonly called the AFFH, that is being conducted in our region. All communities that receive federal funding has a responsibility to complete this assessment that includes analyzing and identifying significant contributing factors to discrimination, prioritizing the factors, setting fair housing goals and taking meaningful actions toward those goals. Through community engagement and the sharing of experiences, your voice will help to bring an awareness to the seriousness of the issues that we as a region face regarding inequality in access to opportunities. The Fair Housing Act of 1968 prohibits discrimination in housing on the basis of race, color, national origin, religion, disability, familial status and sex. There are many opportunities for you to participate in establishing realistic and attainable goals toward affirmatively furthering fair housing for all. Stakeholder meetings and community meetings are being held in your communities. Please go to the AFFH website at AFFH.CityofOmaha.org. The calendar of events is available as well as a community survey. You may also call 402-444-5065 to get a hard

copy of the survey in multiple languages and the calendar of events. It is so important that we hear from you. Take the survey, let your voice be heard. Please join us!"

Emails/Mailings

In addition to print and social media advertising, email invitations were sent out to the Heartland 2050 committee members, organizations identified as stakeholders in each focus area, previous public hearing attendees, the Neighborhood Directory leadership, vendor and business contact list and personal email lists received for reference. The emails included notification of events, invitations and updates.

Following is a listing of agencies, businesses and groups that received emails and/or mailings: (not an exhaustive list)

Non-Profit/Community Advocacy

Non-Profit Association of the Midlands, University of Nebraska-Omaha, Latino Center of the Midlands, Nebraska Appleseed, voice Advocacy Center, Omaha by Design, New leaders Council, Midlands Mentorship Partnership, Justice for Our neighbors, Empowerment Network, Heartland Family Services, Goodwill Industries, One Omaha, Eastern Nebraska Community Action partnership, whispering roots, 75 North Redevelopment, United Way of the Midlands, Urban Indian Health Coalition, YMCA, No More Empty Pots, Lutheran Family Services, Omaha Small Business Network, Omaha Healthy Kids Alliance, Watson group, LLC, Western Iowa Development Authority, 712 Initiative, Voices for Children, Nebraska Families Collaborative, Urban League of Nebraska

Disability Community

Outlook Nebraska, Nebraska medicine, CBS Home Real Estate, Omaha Public Schools, Heartland Workforce Solutions, ModeShift Omaha, ICare Counseling, Omaha Housing Authority, American Legion, Black Hills Workshop, Catholic Charities, Eastern Nebraska Community Action Partnership, friendship Program, Eastern Nebraska office of Aging, Goodwill Industries, Kids Can community Center, Metro Transit, United way of the Midlands, Southwest Iowa Transit, Sheltering Tree, Southern Sudan Community Association, Mayor's Commission on citizens with disabilities, Heartland Family Service, Employment First

South Omaha Stakeholder Meeting

Midlands Latino Community development corporation, congressman Don Bacon's Office, South Omaha Boys and Girls Club, South Omaha Neighborhood Alliance, South Omaha Business Association, Catholic Charities, Heartland Workers Center, Peace Presbyterian, Justice for Our Neighbors, Heartland Workforce Solutions, senator Tony Vargas, City of Omaha, Nebraska Realty, Kroc Center, Arts For All, Sisters of Mercy, Omaha Public Library, Juan Diego Center, Victory Boxing Center, Metropolitan Community College, One World, Restoration Exchange Omaha, Habitat for Humanity, Omaha Together One Community, South Omaha Environmental Task Force, South Omaha Community Care Council, Intercultural Senior Center

Transportation

City of Blair, RDG, University of Nebraska medical Center, Drive Spotter, Mode Shift Omaha, Live Well Omaha, Heartland B Cycle, University of Nebraska-Omaha, Sarpy County, Metropolitan Utilities District, Metro Area Transit, DeOld Anderson Architecture, University of Nebraska Medical Center, Omaha Ambulance, Nebraska Department of Transportation, Felsburg Holt Uhlevig Engineering, HCD, Omaha Land Bank, Union Pacific, Lamp Rynearson and Associates, Omaha Bikes, Lund Company, Hush Blackwell, City of Council bluffs, Verdis Group

Omaha LGBTQIA Focus Group

AFFH Facebook Page, Inclusive Life Center mailing list, Mayor of Omaha's LGBTQIA Advisory Council, flyers distributed at Heartland Pride Parade, Human Rights and Relations Department table at Pride Festival at Stinson Park, University of Nebraska-Omaha Gender and Sexuality Resource Center and website

Development Community

Seldin Company, Faith Urban Planning, refugee Empowerment Center, NeighborWorks Home Solutions, PJ Morgan Real Estate, AAA Bank, inCOMMON Development, Omaha by Design, Tranduction Technologies, Baird Holm, LLC, Berkshire Hathaway Real Estate, Lund Company, Habitat for Humanity, JEQ Consulting, Family Housing Advisory Services, Fair Housing center, Investors Omaha, Liberty Ladies, Nebraska Taxpayers for Freedom, City of Blair, University of Nebraska-Lincoln, Olson Associates, Nebraska Investment finance Authority, Metropolitan community College, Vireo Group, Empowerment Network, Nebraska Title Company, Burlington Capital, Southeast Nebraska Development District, Holy Name Housing, GESU Housing;, Omaha Land Bank, Spar, LLC, ONE Omaha, Douglas County Health Department;, Douglas County Housing Authority, Omaha Housing Authority, NuStyle, Development, Birchwood Homes, Metropolitan Omaha Property-owners Association, Metro Omaha Builders

Association, Build Omaha, Metro Area Continuum of Care for the Homeless, Sienna Francis Homeless Shelter, Open Door Mission, Stephen Center, Holland Bashem Architects, Midtown Neighborhood Alliance, South Omaha Neighborhood Alliance, North Omaha Neighborhood Alliance, North 24th Street Corridor Alliance, Omaha Area Board of Realtors,

North Omaha Group

Union for Contemporary Art, North Omaha Neighborhood Alliance, North 24th Street Corridor Alliance, Neighborhood Action and Fact, Empowerment Network, North Omaha Ministerial Alliance, Urban League of Nebraska, ModeShift Omaha, Eastern Nebraska Community Action Partnership, Omaha Together One Community, Omaha Small Business Network, Urban League young professionals, Veridian Federal Credit Union, Lutheran Family services, Christ community Church, Big Muddy, United Methodist Church, Project Interfaith, Mount Nebo Baptist Church, Trinity Church, St. marks Baptist Church, Hope of glory Congregational Fellowship Church, Salem Baptist Church, St. James Nazarene Church, Sacred heart Ministries, Saint Peters Church, St. John Greek Orthodox Church, Omaha Performing Arts, First Lutheran Church, Omaha World Herald, United way of the Midlands, Omaha public Schools, Douglas County Health Department, Big Mamas Kitchen, Omaha Economic Development Corporation, Loves Jazz, Seventy Five North Redevelopment, 100 Black Men, Black Men United, Omaha Talons Athletic League

Omaha Business Community

Greater Omaha Chamber of Commerce, Omaha Small Business Network, Gateway Economic Development Corporation, Heartland Workforce Solutions, Omaha Convention and Visitors Bureau, Leo A. Daly, Omaha City Council Members, Urban league Young Professionals, Midlands Young Latino professional Association, Nebraska Title Company, Omaha Economic Development corporation, University of Nebraska-medical Center, Tyson chicken;, oriental Trading Company, PayPal, PJ Morgan Real Estate, SAC Federal Credit Union, Cargill, Omaha Public Power District, Infinite 8 Institute, The Start Center for entrepreneurship, Do Space, Interface Web School, Omaha Code School, Omaha Startup Collaborative, Omaha Publications, Olsson Associates, Lamp Rynearson Associates, City of LaVista, City of Papillion, City of Gretna, Sarpy County Chamber of Commerce, Investors Omaha, First National Bank of Omaha

Print Media

Multiple flyers, brochures, fact sheets, and posters were mailed out, distributed and posted in various venues. Public notices were placed in local newspapers as required for public meetings and hearings according to the public participation plans of the partners. Flyers and other materials were translated into multiple languages including Spanish, Arabic and several Asian languages.

Table III-2 Omaha Jurisdiction Print Media/Newspaper Advertising

Newspaper Advertising and Target Population		
Outlet	Frequency	Target Population
The Omaha Star	Weekly	Black community
El Perico	Weekly	Hispanic community
Daily Register	Weekly	Business community

AFFH brochures, website, flyers and AFFH fact sheets were distributed at each meeting opportunity and at all community attended events. Mail outs were done to all neighborhood association leaders and business contact lists.

Sample flyers and posters follow: (shown smaller than published size)

Affirmatively Furthering Fair Housing

How am I affected?



Fair Housing is a Right. Know your Rights.
AFFH.cityofomaha.org



Affirmatively Furthering Fair Housing



Where You Live Shapes Your Life and Your Future

Tell us what you want your home & your future to be like.
Take the AFFH Survey:

<https://www.surveymonkey.com/r/AFFH2017>

For more information please contact:
City of Omaha Human Rights and Relations Department at:
(402) 444-5055
AFFH.cityofomaha.org



Fair Housing is a Right. Know your Rights.



AFFORDABLE HOUSING



WOULD YOU LIKE TO MAKE AN IMPACT ON THE STRATEGIES AND GOALS REGARDING EQUALITY IN YOUR CITY? SHARE YOUR EXPERIENCES AND IDEAS! JOIN US FOR A DISCUSSION ON FAIR HOUSING ISSUES IN THE COMMUNITY.

YOUR VOICE MATTERS!

Stakeholder Engagement	Community Engagement
	Monday, July 17th Midtown Open House 6:30 PM – 8:30 PM UNO Barbara Weitz CEC
Wednesday, July 19th Council Bluffs Development Community 1:30 PM – 3 PM Council Bluffs Public Library, Room B	Monday, July 24th Southwest Omaha Open House 6 PM – 7:30 PM Millard Branch Library
Wednesday, July 19th Omaha LGBTQ+ Focus Group 6:30 PM – 8:30 PM Inclusive Life Center	Thursday, July 27th North Omaha Open House 6 PM – 8 PM Union for Contemporary Arts
Thursday, July 20th Council Bluffs Government 10 AM – 11:30 AM Council Bluffs Community Hall	Sunday, July 30th South Omaha Open House 2 PM – 4 PM St. Frances Cabrini Catholic School Gym
Thursday, July 20th Council Bluffs Human Service Agencies / Civil Rights 1:30 PM – 3 PM Council Bluffs Community Hall	Monday, August 7th Northwest Omaha Open House 4:30 PM – 5:30 PM Milton R. Abraham Omaha Public Library
Friday, July 21st Omaha Latino Stakeholder Meeting 2 PM – 4 PM South Omaha Public Library Rooms A & B	Tuesday, August 8th Council Bluffs Chamber / Employers / Public 4:30 PM – 6 PM Council Bluffs Public Library, Room B
Friday, August 4th Omaha Businesses Meeting 10 AM – 12 PM MAPA Training Room	Wednesday, August 9th South Omaha Open House 6 PM – 8 PM South Omaha Public Library Rooms A & B
Monday, August 7th Omaha Housing Authority Meeting 6 PM – 8:50 PM Milton R. Abraham Omaha Public Library	Tuesday, August 10th Council Bluffs Public 6 PM – 8 PM Council Bluffs Public Library Room B

FOR EL CANAL DE COX
Y 89 DE CENTURY LINK

¡DISPONIBLE YA!
directoriolatinoomaha.com

Promoviendo Positivamente La Vivienda Justa

¡SU VOZ IMPORTA!
Usted compartió sus historias sobre como acceder las oportunidades en la región de Omaha. Es tiempo de transformar sus preocupaciones en objetivos y crear un plan para hacer de la vivienda justa una realidad para todos.
Únase con nosotros para el siguiente paso en la creación de estrategias para superar los retos hacia una vivienda justa. Vea los resultados de las reuniones comunitarias y de las encuestas regionales y vote por sus prioridades fundamentales. ¡No pierda la oportunidad de ser parte de una solución!
Para más información visite: affh.cityofomaha.org

¡Únase con nosotros en el camino a las soluciones!

Presentadores con discursos informativos

Actividades interactivas

Presentaciones dinámicas

Scottish Rite Masonic Center
202 S. 20th Street Omaha NE 68102

24 de octubre de 2017
De 6:30 a 8:30 p.m.
Estacionamiento disponible al sur del edificio cerca de la 20th Street

24 DE OCTUBRE DE 2017
DE 6:30 P. M. A 8:30 P. M.

FORO PARA PROMOVER POSITIVAMENTE LA VIVIENDA JUSTA

16 el perico | Del 19 al 26 de Octubre del 2017 |

Digital Advertising

Digital Ads targeted to internet users were used for stakeholder and community meetings, community forums and survey outreach. Invitations and flyers were posted on the partner websites, the City of Omaha HCD Planning Department website, the City of Omaha Human Rights and Relations website, "The Village" website and local news websites.

**CITY OF OMAHA PLANNING DEPARTMENT
HOUSING AND COMMUNITY DEVELOPMENT DIVISION**
Omaha, Nebraska

Douglas County | City of Omaha (402) 444-5150

- Planning Department Home
- HCD Home
- Plans
- Accomplishments
- Archives
- Housing Programs
- Lead Hazard Information
- Neighborhood Resources
- Economic Development
- Healthy Homes
- Urban Gardens
- Holistic Neighborhood Revitalization
- AFFH
- Contact Us

NEIGHBORHOOD ACTION & FACT - KING SCIENCE
Neighborhood Action & Fact - King Science Initiative is a holistic neighborhood revitalization effort led by HCD in partnership with several area non-profit organizations. To learn more about this [Click Here](#).

2018 CONSOLIDATED PLAN
The 2018 Consolidated Plan is available for public review and comment. For more information visit [here](#).

NEIGHBORHOOD ASSOCIATIONS
The Neighborhood Association page contains our handy "look-up" tool and the Neighborhood Directory. To learn more about this [Click Here](#).

Text Size: - | +

What is Affirmatively Furthering Fair Housing? (AFFH)?
[Click to learn more](#)

Mobile users, click on the three horizontal white lines in the upper left to view our website menu.

Welcome to the Omaha Planning Department - Housing and Community Development Division Website!

Social Media

A facebook page was created dedicated to sharing information and events related to the AFFH. Information was also posted and shared on the Heartland 2050's Facebook page.





JUN 29 Fair Housing Assessment Meeting: Transportation

Public · Hosted by Heartland 2050

★ Interested ✓ Going

🕒 Thursday, June 29 at 9:30 AM - 11 AM
about 5 months ago

📍 Omaha-Council Bluffs Metropolitan Area Planning Agency
2222 Cuming St, Omaha, Nebraska 68102 [Show Map](#)

About

Discussion

**Omaha AFFH Meeting:
Non-profit / Community Advocacy**

[Click to RSVP](#)

The City of Omaha, with the assistance of the Metropolitan Area Planning Agency (MAPA), will be conducting an Affirmatively Furthering Fair Housing (AFFH) assessment to study the impediments to fair housing choices throughout the community.

The participation of the non-profit/community advocacy community to identify the impediments to housing choices in the city is vital to the development of AFFH.

Please join us on Thursday, June 15, from 9:30 a.m. to 11:30 a.m. in the downstairs meeting room at MAPA to provide your feedback and comments. If you are unable to attend, please send a representative. In preparation for the meeting, please look over the AFFH site linked below. Sharing this invitation with appropriate contacts in your network would be appreciated.

[Click to View AFFH Site](#)

*Go to Maps & Tables section for instructions to view AFFH maps with data specific to Omaha.

🔄 Forward 🔄 Share

👤 Share



JUN 16 Fair Housing Assessment Meeting: Development Community

Public · Hosted by Heartland 2050

★ Interested ✓ Going

🕒 Friday, June 16 at 12:30 PM - 2:30 PM
about 7 months ago

📍 Metropolitan Area Planning Agency
2222 Cuming St, Omaha, Nebraska 68102 [Show Map](#)

About

Discussion



JUN 15 Fair Housing Assessment Meeting: Disability Community

Public · Hosted by Heartland 2050 · 1 comment pending (1)

★ Interested ✓ Going

🕒 Thursday, June 15 at 12:30 PM - 2:30 PM
about 8 months ago

📍 Metropolitan Area Planning Agency
2222 Cuming St, Omaha, Nebraska 68102 [Show Map](#)

About

Discussion

Do you know neighborhoods that discriminate?
Do you have trouble accessing services like transportation, education, food, or healthcare?
Is your housing affordable for you, and does your housing meet the needs of your family?
Do you experience barriers related to disability?
Does anyone in your family feel targeted because they are 'different'?

Your voice should be heard. The Omaha Housing Authority, together with the City of Omaha and other partners, is conducting an assessment of housing needs in our community. Your experience will help guide our leaders to address discrimination, to build strong neighborhoods, and to ensure equal access to quality affordable housing for everyone in our community.

JOIN US TO LEARN MORE

OHA IS HOSTING A COMMUNITY MEETING
MONDAY, AUGUST 7 at 6:00 pm
MILTON R. ABRAHAMS PUBLIC LIBRARY, 5111 N. 90th ST

OPEN HOUSE COMMUNITY MEETINGS

JULY 24	6:00 – 7:30 pm	MILLARD BRANCH LIBRARY, 13214 Westwood Lane
JULY 27	6:00 – 8:00 pm	UNION FOR CONTEMPORARY ARTS, 2423 N. 24 th Street
JULY 30	2:00 – 4:00 pm	ST. FRANCES CABRINI SCHOOL GYM, 1335 S. 10 th Street
AUG 7	4:30 – 5:30 pm	MILTON R. ABRAHAMS PUBLIC LIBRARY, 5111 N. 90 th Street
AUG 9	6:00 – 8:00 pm	SOUTH OMAHA LIBRARY, 2808 Q Street, Meeting Rooms A&B

TAKE THE ONLINE SURVEY

www.surveymonkey.com/r/AFFH2017

PAPER COPIES ARE AVAILABLE AT ANY OHA OFFICE
OR REQUEST A COPY BY EMAIL mnovak@ohauthority.org

LEARN MORE <https://affh.cityofomaha.org/>

For ADA accessibility, please contact the City ADA Coordinator (402) 444-5067 48 hours prior to the scheduled meeting.

Part II Community Organizations Consulted

As listed in Part I, many organizations, groups and individuals were contacted in various ways to engage both in meetings, conferences, forums and as facilitators for the distribution of information. The partners used all contacts and in-house mailing/email lists, previous activity sign-in sheets, personal contacts and resource guides to distribute information to the region.

Community organizations consulted during the community engagement process: (not an exhaustive list)

Omaha Public Schools
University of Nebraska Omaha Service Learning Academy
Latino Center of the Midlands
Nebraska Appleseed
University of Nebraska-Omaha
Food Bank of the Heartland
in COMMON Community Development
Omaha Economic Development Corporation
Greater Omaha Chamber of Commerce
Omaha Healthy Kids Alliance
Omaha Housing Authority
Omaha by Design
Empowerment Network
Midlands Mentorship Partnership
Urban Indian Health Coalition
United Way of the Midlands
Heartland Family Services
Eastern Nebraska Community Action Partnership
Voices for Children
Douglas County Health Department
Heartland Workforce Solutions
Lutheran Family Service
Justice for Our Neighbors
Habitat for Humanity
Heartland Workers Center
Sherwood Foundation
Non-Profit Association of the Midlands
Urban League of Nebraska

Big Muddy Urban Farm
ONE Omaha
NeighborWorks Home Solutions
75 North Redevelopment
Black Men United
Omaha Small Business Network
AAA Bank
Family Housing Advisory Services
Fair Housing Center
Restoration Exchange Omaha
Metro Transit Authority
ModeShift Omaha
Omaha Bikes
Omaha Land Bank
Spark
Omaha Together One Community
Eastern Nebraska Office on Aging
Outlook Nebraska
Autism Nebraska
Union for Contemporary Art
Refugee Empowerment Network
Heartland 2050 Equity and Engagement Committee

PART III Evaluation of Community Participation

Program partners engaged in numerous activities to obtain thorough, meaningful participation for the AFH. The meeting attendance was generally positive. The engagement process lasted over 10 months. Beginning with existing committees as part of the Heartland 2050 Vision project and transitioning to the kick off of the Regional Affirmatively Furthering Fair Housing (AFFH) effort. The AFFH Forum held October 24th was meant to close the period of engagement by reflecting back to the public what was heard during the period for public input. A handful of interviews and meetings took place after October 24th in an attempt to address any further questions that had not been previously answered.

The first set of stakeholder meetings were used to engage partner organizations, private industry by type, and community based organizations in providing expertise around their experience of fair housing issues, factors, and strategies. These partners were identified through kick off workshops, engagement in prior assessments, and by consulting other housing advocates and organizations.

Some of the barriers to participation of stakeholders were the planning fatigue, concern over the national political climate, and a lack of belief in the efficacy of the project. Many groups in Omaha have been asked to participate in public participation previously around similar issues and did not feel their feedback led to real change. Locally, there exists some grassroots organizations that have communicated concern over the use of federal funds based on previous participation projects. These concerns were noted and resulted in the commitment of program partners to report key findings and their impact on the AFH process.

The feedback received from the stakeholder meetings, individual meetings, focus group meetings, open house meetings, events in the community and the survey were used to inform the framing of contributing factors/issues that led to recommended strategies and goals to overcome barriers to fair housing.

In addition to using the feedback to guide the creation of strategies, the participation broadened the scope of conversation to include holistic approaches to providing an increase of high quality, affordable housing. The AFH has contributed to an increase in the number of stakeholder and community discussions on issues of segregation, lack of access to opportunity, and other disparities across protected classes.

Based on stakeholder feedback, the most prevalent fair housing issues in the region include:

- Lack of affordable housing units equally distributed throughout the region
- Concentration of racial and ethnic minorities in low income communities
- High quality schools are not equally distributed throughout the region
- Lack of affordable housing located near public transportation
- Lack of accessible housing for people with disabilities
- Issues related to discrimination/institutional racism

Comments consistently heard throughout the meetings were :

- “If done correctly, transportation can connect housing, jobs, schools, and social services to give people more choice in where they live”
- “We need to encourage affordable infill development in East Omaha”
- “there are not enough affordable and accessible apartments for the disabled population”
- “A mix of housing size and affordability within a neighborhood means diverse people for the neighborhood”
- “We need to make places that need to be fixed up affordable and accessible”
- “education is key. We need to drastically increase our expectations for kids and families.”

PART IV Summary of Comments and Participation

Results from Public Feedback

The public participation process allowed for fruitful conversations to occur at the stakeholder meetings and public open houses. While many of the issues discussed are not new to the area, many still struggle to find solutions. Feedback received from conversations, surveys and worksheets are incorporated in the body of the assessment. All comments from public meetings were also published on the AFFH website. In addition, meeting summaries can be found in Attachment A.

Figure III-3 Word Graph of Comments from Public Engagement



Source: Community and stakeholder meeting summaries

Additional Comments from Open House events:

In the last 5 years, have you experienced discrimination when trying to buy or rent housing?

- Being a single parent
- Bank employee was extremely slow and asked for more job history than was necessary
- The bank actually told me that if I could show some kind of distress I would qualify for assistance. So they were telling me to miss payments on purpose instead of struggling to make ends meet to get assistance. This is not acceptable.
- Only have been shown certain areas of town. I had to do my own research and demand to be shown houses in other areas
- Before being married as I am now, my felony record, I would fail background checks and be denied. Even though in my profession I made 60-65k/year and haven't had a charge since I was a teen (over 15 years.)
- Pregnancy

If you have applied for or taken out a loan for housing from someone other than a bank, why did you pick that option? What was your experience?

- Refinance at a Credit Union. They are not responding I feel like they are trying to make me keep the current rate of interest I am paying.
- Medical expenses I couldn't afford. It was difficult to get out of the cycle of getting a loan, paying it the next week, and getting another for living money.
- Needed the cash for a deposit, chose the easiest short term solution. Not a pleasant experience & very expensive in the long run.
- I felt dehumanized because payday loan companies OBVIOUSLY rip you off, but I had no choice.
- I tried credit unions and banks; some I was met with professionalism, others I was just given the niceties with the raised eyebrows and the pursed lips with the "we'll let you know" line.
- I couldn't get the loan I needed because I'm self-employed. This creates a less comfortable family situation and is a bit difficult to afford, but we did it for the school district.
- Because my parents have no assets- I put myself into mega debt to get my degree because I knew it would be my ticket up and out.

The community outreach conducted for the Assessment of Fair Housing/Analysis of Impediments provided information that was used to create and prioritize contributing factors to fair housing listed throughout this document. These factors are also the foundation for the goals included in the Executive Summary and Section IV of this assessment.

The community engagement process revealed gaps in communication between government entities and different groups, included protected classes within our communities. In part as a response to the challenges found in outreach efforts for the AFH, a group of City and County staff are working to update community engagement processes for multiple governmental departments.

COUNCIL BLUFFS

Part I Outreach Activities and Methods of Engagement

In conjunction with the Municipal Housing Agency, the City of Council Bluffs held a variety of public meetings and one-on-one sessions to educate residents about AFFH and gain feedback. Attachment B is the meeting schedule for Council Bluffs.

In order to reach the largest number of individuals, the City and MHA employed several tactics:

- i. Emails were distributed to a list of over 170 individuals and covered partnering agencies, government officials and other local stakeholders;
- ii. Social media blasts were provided through the City's Facebook and Twitter pages as well as on the City's and MHA's respective websites;
- iii. Press releases were run in the Daily Nonpareil for each event to reach those without internet access;
- iv. Posters and fliers were displayed/handed out at MHA as well as in the Community Development Department offices; and
- v. The City partnered with Centro Latino to assist with reaching individuals with limited English proficiency.

The Municipal Housing Agency met with their Resident Advisory Board (RAB) on May 17, 2017 for their Annual Resident Advisory Board Meeting. During this meeting information regarding the AFFH process, and how the individuals from the Resident Advisory Board can provide input and feedback in the process was discussed. The individuals of the RAB provided fair housing issues they experience. The RAB expressed concerns over disproportionate housing needs, such as inadequate

affordable housing stock (i.e. not having adequate basic amenities, not having large enough units, cost of housing), housing in specific areas is too costly and does not fall within the payment standards that a Section 8 participant must follow.

The Municipal Housing Agency had two different meetings with the Resident Advisory Board and a few other individuals from different agencies throughout Council Bluffs, as well as the Board of Commissioners for Municipal Housing Agency on June 28, 2017. Information regarding the AFFH process and feedback was provided.

Part II Community Organizations Consulted

The City of Council Bluffs and Municipal Housing Agency consulted with different organizations and will continue to communicate during the community participation process. The organizations that have been consulted are as follows:

Council Bluffs Chamber of Commerce
Hearing/Deaf Council Bluffs Silent Club
Centro Latino
Council Bluffs Rotary Club
Council Bluffs Landlord Association
Justice for our Neighbors
Seldin
NP Dodge
J Development
Council Bluffs Neighborhood Associations
Iowa West Foundation
Legal Aid
City of Council Bluffs Building Division
City of Council Bluffs Planning Commission
Council Bluffs City Council
Pottawattamie County Offices
Council Bluffs Civil Rights Commission
Council Bluffs Health Department
Community Development Advisory Committee
Pottawattamie County Department of Human Services
Council Bluffs Housing Trust Fund
Pottawattamie County Department of Veteran Affairs
Municipal Housing Agency Resident Advisory Board
Municipal Housing Agency Board of Commissioners

Municipal Homes Inc. Board of Directors
Micah House
Heartland Family Services
Family Housing Advisory Services
American Red Cross
Southwest Iowa Board of Realtors
New Visions Homeless Services
Salvation Army
NeighborWorks Home Solutions
League of Human Dignity
Boys & Girls Club
Connections Area Agency on Aging
Metro Area Continuum of Care for the Homeless
Human Service Advisory Council (HSAC)
Catholic Charities
Inter-Faith Response

Part III Evaluation of Community Participation

Meeting turnout varied by stakeholder group. Staff encouraged stakeholders and the public to attend any meetings that met their availability to encourage participation. The landlord and human services stakeholder groups were very active in attending meetings and giving feedback. These groups tend to be more active in Council Bluffs with a strong landlord association and the Human Services Advisory Council (HSAC). The government stakeholders were less active in the process due to a lack of involvement with housing type activities. Public meetings had average turnout with approximately 20-30 attendees commenting at each meeting level. This is average for public participation in Council Bluffs.

Part IV Summary of Comments and Participation

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

The most prevalent comments for Council Bluffs were a need for additional affordable housing in a range of sizes, affordable, accessible housing in a range of sizes, and increased public transit opportunities for residents. The other main comment recognized a need for additional public transit services for all residents.

Other comments were:

- Not enough housing
- There are a limited number of places that accept housing vouchers
- Services for low income/poverty are not realistic or are too difficult to utilize
- Crime in Council Bluffs is high
- Service(s) and assistance is not readily available or not realistic
- Condition of rental units is bad
- The City needs to stop forcing landlords to register their properties
- Council Bluffs has horrible areas for crime and drugs in low income areas

Public comments and summaries from meetings and open house events in Council Bluffs can be found in Attachment F.

BELLEVUE

Part I Outreach Activities and Methods of Engagement

In order to encourage and broaden community participation in the AFFH plan, the City of Bellevue utilized different avenues of outreach activities including expanded distribution of information about the AFFH process including hosting community meetings, distributing a community survey, and holding meeting and phone conferences with individual stakeholders.

The City of Bellevue utilized media outreach as an important avenue to publicizing community meetings. Direct mail and email invitations were sent to members of the CDBG distribution list and community stakeholders, including local service providers, previous applicants and community residents. Legal ads regarding the public hearings were also placed in the Bellevue Leader. The City of Bellevue utilized their website and Facebook page to publicize public hearings and community meetings and reach residents who may not be familiar with the CDBG program.

To provide information regarding the AFFH process, the City of Bellevue utilized the City of Omaha's website for the regional AFFH plan and included the address in all publications. The information was posted on the City's website, social media pages, and distributed at meetings. Also included with the notices was information and directions to obtain publications in additional formats. A variety of organizations working with LEP and persons with disabilities were invited to participate in the AFH events and invitations

included information for those who needed assistance or accommodations to participation.

The City hosted three public meetings to obtain information from residents and public officials. Notices were published on the City's website, social media page, and to the CDBG mailing list. The meetings were held on: May 3, 2017; September 15, 2017; and December 14, 2017. These meetings were held in various locations throughout Bellevue to offer several opportunities for the public to attend including the Bellevue Public Safety Building, Bellevue Fire Training Center, and Bellevue University. To expand outreach efforts, the City also held targeted individual stakeholder meetings to gather insight about specific aspects of community assessment that were lacking information this included City's CDBG staff meeting with Bellevue Public Schools and the Bellevue Chamber of Commerce, as well as city staff members.

Bellevue also participated in the regional fair housing survey. The survey was developed and distributed to the CDBG distribution list as well as advertised on the City's website and Facebook page. In addition, the City provided the survey to all city employees and Sarpy County employees. A memo and survey link were included in emails to providers to make sharing the information with their distribution list easier. Of the survey responses, 142 came from Bellevue associated zip codes with the majority reporting the survey provided by a City of Bellevue employee or website.

Bellevue Housing Authority

Bellevue Housing Authority (BHA) recognizes that significant community involvement in the AFFH process is necessary to make the AFFH identification of issues, goal setting, and strategy development as successful as possible. The agency has worked to reach out to the residents of the Housing Authority, its Housing Choice Voucher participants, waiting list applicants, community members, agency partners, current landlords, potential developers, and the community at large. The agency began in March by gathering commitments from its own board and advisory teams. AFFH topics and ongoing goal setting processes were discussed at each meeting of the BHA board and at all community meetings in which it has participated in the period leading up to the AFFH submission.

Identification of issues was gathered in conjunction with the metro area partners and through individual conversations related to the survey. Surveys were dispersed, advertised, and collected in the Bellevue locations (Bellevue Public Library, Bellevue Senior Center, One World Health, the BHA office, and other public places.) Outreach via

email to established list of the Housing Authority was sent in July. The BHA list at that time had 775 contacts. According to the reporting software, about 31% opened the email and 63 clicked through to the survey. On July 18, 2017 BHA had a booth at a local sports venue and distributed over 500 cards with the survey information.

The agency distributed survey information to 175 BHA households as part of its Back to School distribution the week of July 18. After providing a 45 day notice, BHA held a public meeting for residents on 10/16. Five residents participated. This is consistent with the average turnout for BHA's public housing programs. Historically, it has been very difficult to get residents to attend meetings of this type. As such, in order to expand this involvement, continual conversations about what is impacting our residents with regards to AFFH issues is where BHA's focus has been. As part of annual interviews AFFH questions were asked and information was obtained. Special focus was given to our African and Middle Eastern immigrant households as those families have historically had our highest issues of AFFH issues. Bellevue Housing Authority believes that as documented above, its program participants and waiting list applicants had reasonable opportunities for involvement.

Part II Community Organizations Consulted

City of Bellevue – Administration, Finance, Fire, Human Services, Permits and Inspections, Planning, Police, Public Works Departments

Bellevue City Council

Bellevue CDBG Committee

HUD, Omaha, Field Office

HUD, Kansas City, Office of Fair Housing & Equal Opportunity

Offutt Air Force Base

Bellevue Chamber of Commerce

Metropolitan Area Planning Agency

Sarpy County Economic Development Corporation

Sarpy County Public Administration

Sarpy County Board of Commissioners

Sarpy County Chamber of Commerce

Eastern Nebraska Office on Aging

Bellevue Senior Center

Habitat for Humanity of Sarpy County

Metropolitan Area Continuum of Care for the Homeless

Bellevue Food Pantry

Eastern Nebraska Community Action Partnership

Sheltering Tree, Inc.
Bellevue Public Schools
Rebuilding Together Omaha
Green Bellevue
Sarpy County Museum
United Way of the Midlands
Bellevue Housing Authority Foundation
Sarpy County Court Appointed Special Advocates
Bellevue Leader
Bellevue Junior Sports Association
Bellevue Public Safety Foundation
Better Business Bureau
Fraternal Order of Eagles
Rising View Housing
Eastern Nebraska Veteran's Home
Nebraska Hispanic Chamber of Commerce
Lift Up Sarpy County
Catholic Charities
Goodwill Industries
Heartland America Chapter Military Officers Association
Kiwanis Club of Bellevue
Knights of Columbus Council
Lutheran Family Services
Midlands Community Foundation
Omaha SCORE Chapter
Tobacco Free Sarpy
Sarpy County Health Department
Nebraska Medicine
Bellevue University
Papillion La Vista Community Schools
Omaha Public Schools
Metropolitan Community College
Sarpy County Cooperative Head Start

Part III Evaluation of Community Participation

Following low community input at the first public meeting with elected officials, the City of Bellevue expanded outreach efforts through direct mailing invitation and information as well as increased posting to social media sites in order to elicit additional community

involvement. The following two community meetings provided important and insightful discussion with community members and service providers which assisted in identifying fair housing issues and contributing factors. The responses to personal invitations to the meetings were positive and assisted with increasing participation. For areas needing additional information, the City of Bellevue and Bellevue Housing Authority conducted phone interviews and targeted individual stakeholder meetings which provided valuable information to assist with the shaping of the fair housing analysis.

Part IV Summary of Comments and Participation

Comments obtained through community input was focused on the categories of transportation and affordable housing. Comments included:

Affordable Housing:

- Residents are choosing to remain in Bellevue, but the housing for growing families is not currently available which limits the amount of available affordable housing for new residents.
- The market of three and four bedroom plus housing is very small and larger families are moving outside of Bellevue in order to find housing.
- Lack of housing available for the disabled community.
- Community opposition to additional development of affordable housing.
- Tax laws prohibitive to public/affordable housing, higher tax base makes affordable housing development more difficult

Transportation:

- Citizens who wish to live in Bellevue are aware of the limited availability of public transportation.
- Lack of housing near public transportation.

Other:

- Community assets include the public safety provide by police and fire as well as the public school system.
- Funding available to address issues identified is very limited and additional funding sources will have to be identified.
- Lack of employment opportunities and job centers within in Bellevue, also due to criminal background and transportation limits.
- Lack of supportive services for families with new employment

- Social services are limited and there is confusion regarding city and county limits and borders which limits areas of service availability.

Bellevue Housing Authority

Most frequent comments received from program participants:

- Landlords that aren't tax credit landlords don't take Housing Choice Vouchers.
- It is hard to find larger homes in an affordable range.
- Existing affordable multi-family housing is aging and becoming run down.
- Lack of supportive services for families.
- Homeless and transitional services don't cross county lines.
- Lack of Transportation services.

Most frequent comments from community members:

- Perception of lack of need for services and housing for marginalized persons.
- Zoning isn't conducive to building in higher opportunity areas.
- Property taxes are high and not favorable to unsubsidized affordable construction.
- Supportive services aren't needed because there aren't community members that need them.

SECTION IV.

Assessment of Past Goals, Actions and Strategies

SECTION IV.

Assessment of Past Goals, Actions, and Strategies

SECTION IV Assessment of Past Goals, Actions, and Strategies

Key Terms:

LMI: low and moderate income

NEOC: Nebraska Equal Opportunity Commission

OHRRD: City of Omaha Human Rights and Relations Department

HUD: Housing and Urban Development

CDBG: Community Block Grant Funds

TIF: Tax Increment Financing

ADA: Americans with Disabilities Act

HOME: HOME Investment Partnerships Program

LIHTC: Low Income Housing Tax Credits

AI: Analysis of Impediments

OMAHA

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

Goals articulated in the most recent Analysis of Impediments in 2010 included:

1. Support a community-wide program to help reduce public opposition to group living facilities, public-assisted housing, and other locally unwanted land use through education and outreach
2. Support an integrated approach to fair housing enforcement that includes fair housing education, to inform and encourage the public to recognize and report housing discrimination, and collaboration of all fair housing enforcement agencies.
3. Increase the amount of affordable and accessible housing stock in the community and ensure that persons with physical or mental disabilities fully and equally enjoy housing opportunities.
4. Conduct a more extensive study of the homeowner insurance market to determine the scope of identified problems & identify potential systemic approaches to eliminate insurance barriers to fair housing choice.
5. Promote the access to and utilization of legitimate, non-predatory, and affordable credit services through public education, policy review and advocacy, and the

development of alternative financial services readily available to all sectors of the community.

6. Increase the availability and supply of safe and affordable rental housing stock in Omaha for low and moderate income individuals and families
7. The City of Omaha and the City of Council Bluffs create incentives that would increase the supply of fully accessible housing for rent and for sale as well as units with supportive services readily available
8. Lending institutions in the Consortium area be encouraged to market more aggressively to minority markets as part of their fulfillment of their CRA responsibilities and a good business practice
9. The City studies the pros and cons of instituting a registration process for all rental units, including routine inspections to ensure the housing stock is maintained at the minimum dwelling standards
10. The Mayor's Fair Housing Advisory Group be provided with adequate resources to help them carry out their mission to ensure the City is affirmatively furthering fair housing.
11. The City develop or sponsor a program of fair housing education, such as a conference or similar event, to provide community education on fair housing issues designed for the general public and for housing providers.

2. Discuss what progress has been made toward the achievement of fair housing goals in Program Years (2010 – 2017).

Goal 1: Support a community-wide program to help reduce public opposition to group living facilities, public-assisted housing, and other locally unwanted land use through education and outreach.

Educational materials were created for use by the City, real estate developers, community-based organizations, and local fair housing groups to educate residents and address concerns regarding the inclusion of publicly supported/assisted housing. The materials are aimed at helping the greater community understand the potential benefits of providing housing for LMI families.

The Fair Housing Center has continued to conduct presentations to neighborhood groups, schools, panel discussions, conferences, and workshops. The Fair Housing Center works collaboratively with HUD, the NEOC, and OHRRD, OHA, and property management companies to provide education, training, and other outreach services in the greater Omaha area. In addition to education and outreach activities, the Fair

Housing Center works to end housing discrimination through comprehensive testing program, investigation of complaints, advocacy, and mediation services.

The City of Omaha Human Rights and Relations Department produces brochures, videos, and other educational materials in multiple languages on Fair Housing rights and laws. In addition they consult with other City departments and community organizations on fair housing related outreach and compliance. This department has a presence at many conferences, at workshops, and panel discussions. OHRR sponsors many events annually including a Martin Luther King Celebration, Multicultural Brown Bag Lunch Series, and Table Talk discussions with Inclusive Communities Inc. Staff serve on numerous boards and committees such as the Heartland 2050 Housing Committee, Refugee Task Force, Mayor's Commission for Citizens With Disabilities, Southern Sudan Refugee Resettlement Board, and the Mayor's Fair Housing Advisory Board.

The Omaha office of the Nebraska Equal Opportunity Commission (NEOC) provides fair housing education in the Omaha area, including mandatory fair housing training for respondents in fair housing cases. The commission meets monthly to hear public comment and rule on cases related to discrimination and public accommodations.

Subtask: Develop a formal process that encourages and supports the use of alternative dispute resolution to help housing providers and neighborhoods reconcile differences over group home issues, public-assisted housing and similar locally unwanted land use.

Although a specific network has not been developed, there are existing resources that are being used to provide the services needed. The Planning Board of the City of Omaha meets with residents and interested parties of an action. Council persons hold town hall meetings where residents voice concerns. City staff attend neighborhood meetings in an effort to further the discussion regarding fair housing rights, community perceptions, and anticipated future projects.

Agencies, neighborhood leaders, and others are encouraged to contact Concord Mediation Center for formal conflict resolution. Concord Mediation Center creates pathways for constructive dialogue and conflict resolution. The Center provides mediation, facilitation and education through specialized alternative and innovative methods to manage personal or professional conflicts.

Subtask : Continue to increase the stock of affordable housing that is available to meet the needs of the population of persons with disabilities and the homeless.

The City of Omaha provides, through HUD funding, Emergency Solutions Grants (ESG) to assist the homeless population. ESG funds are passed through to various local organizations that provide assistance and prevention services to homeless and vulnerable populations. Eligible activities for the ESG program include street outreach and emergency shelter services and short and medium-term rental assistance and housing relocation and stabilization services

Supportive Housing Program (SHIP) funds are competitive HUD funds applied for directly by area nonprofit organizations. SHIP funds support activities directed at ending and reducing homelessness. They fund the development and support of Continuum of Care housing Initiatives- permanent housing, permanent supportive housing, transitional housing. The City also receives and administers Shelter Plus Care (S+C) funds that provides rental assistance for chronically homeless individuals with severe mental illness. Chronically homeless individuals and families are identified through the efforts of several outreach and service agencies (Community Alliance, Charles Drew Health Center, Heartland Family Service, the Nebraska Aids project, Sienna Francis House, Stephen Center, Visiting Nurses Association, Veterans Affairs, and Youth Emergency Services). Once identified, they are assessed by those same agencies and referred to what is currently the most appropriate of available housing options. After housing is established, case managers work with the individuals and or families to stabilize their situation and connect them to needed services.

The City is the jurisdiction's grantee for rental assistance for the chronically homeless with mental illness, a 22-bed program, run in partnership with OHA and Community Alliance. Other housing programs serving the chronically homeless are Heartland Family Service's Samaritan Program, the Veterans Administration Supportive Housing (VASH) program; and the Sienna Apartments PSH Project and new Visions PSH. Emergency shelters and other programs, including transitional housing facilities, also provide and/or work to secure housing for the chronically homeless in route to ending their homelessness. The City of Omaha also provides HOME funds for tenant based rental assistance through OHA to assist near homeless households.

Subtask: Provide education to local elected officials, real estate developers, landlords, property managers, and neighborhood associations on NIMBYism, siting issues, and applicable fair housing laws.

The Mayor's Fair Housing Advisory Board, established in 1993 is one vehicle used by the City to address the barriers identified in the AI. The Advisory Board has addressed the need for public education through a public marketing campaign. Fair housing related articles and public service announcements have been published in several print and broadcast media outlets including: Cox Cable, Journal Broadcasting radio stations, apartment guides and magazines, The Omaha Star and El Perico. Members also appeared on a KVNO radio show to discuss fair housing issues. The Advisory Board initiated a partnership with the Omaha Public Schools (OPS) in 2010 to integrate fair housing concepts and issues into current curriculum. Further discussions with OPS have taken place in subsequent years to initiate Fair Housing training for teachers.

The Advisory Board has sponsored a Fair Housing conference, "Realities in Housing" for the past 3 years. This conference has focused on fair housing issues in real estate, lending, landlords and the Affirmatively Furthering Fair Housing analysis that the City has conducted. The board continually is involved in additional training opportunities and pursues various ways to produce information for distribution to the public on fair housing issues.

The Omaha Human Rights and Relations Department continues to provide learning opportunities in diversity, inclusion and fair housing rights. Brochures, flyers, DVD's are produced in multiple languages and distributed at all events attended such as the World Refugee Day, Earth Day, all local conferences, job fairs, and trainings. Sponsored events also offer opportunities such as the Martin Luther King event held annually, Cinco De Mayo celebration, International Women's Day celebrations, activities held during Fair Housing month (April), and Omaha's Diversity Week events. Staff provides training on Small Emerging Business process, ADA compliance, fair housing issues, landlord/tenant law regarding fair housing issues. OHRRD completed the Limited English Proficiency (LEP) Plan for the City of Omaha in 2015.

Goal 2: Support an integrated approach to fair housing enforcement that includes fair housing education, to inform and encourage the public to recognize and report housing discrimination, and collaboration of all fair housing enforcement agencies.

There are four governmental bodies and one private, nonprofit agency providing fair housing services in the City of Omaha or in Council Bluffs:

1. U.S. Department of Housing and Urban Development, Fair Housing and Equal Opportunity Offices (HUD)
2. Nebraska Equal Opportunity Commission (NEOC)
3. City of Omaha's Human Rights and Relations Department (OHRRD)
4. Fair Housing Center of Nebraska – Iowa (FHC)
5. City of Council Bluffs Civil Rights Commission

OHRRD, NEOC and HUD have the capacity to conduct investigations of fair housing complaints in Omaha and to conciliate or settle those complaints. These agencies act as impartial investigators and they have the power to subpoena records and require witness testimony. Council Bluffs' Commission does not file claims with nor does it receive cases from HUD. The Fair Housing Center works to end housing discrimination through testing, investigation, advocacy, mediation services, and additional education and outreach activities. It is a full-service Center providing investigation, broad based testing, and mediation services for all persons protected by Federal, State and local Fair Housing laws. The Center is the only nonprofit agency designated as a Qualified Fair Housing Enforcement organization by HUD in the states of Nebraska and Iowa. The NEOC has created a learning curriculum for all school ages on Fair Housing issues and activities. The Fair Housing Board and the City Planning Department will collaborate to champion the use of this program through the various school system

Goal 3: Increase the amount of affordable and accessible housing stock in the community and ensure that persons with physical or mental disabilities fully and equally enjoy housing opportunities.

Subtask : Educate developers, non-profit organizations and architects about ways they can enhance the accessibility of existing units and increase the availability of accessible units

The City of Omaha complies with Section 504 of the Rehabilitation Act and partners with the League of Human Dignity to create/modify housing to serve persons with disabilities. The City of Omaha uses at least a minimum of 25% "visitability" standard in

HUD funded new construction homes. Visitability refers to single-family housing that is designed to be visited by people who have mobility issues or impairments. The City's nonprofit developers are increasing construction of accessible and/or visitable new homes.

Recently a bill, LB496 allows the use of TIF to finance workforce housing in areas with high unemployment and poverty rates within cities. It defines workforce housing as owner-occupied housing units that cost no more than \$275,000 to build, or rental housing units that cost no more than \$200,000 to build. Other requirements have to be met, however, this provides an opportunity to utilize a source of funding that has not been used in Omaha.

Subtask: Amend existing zoning and land use regulations to enhance access to affordable housing by persons with physical or mental disabilities (removing spacing requirements, define Group Home and Family in charter)

City ordinances were modified to eliminate spacing requirements between group home facilities. No other changes have taken place in this area.

Goal 4: Conduct a more extensive study of the homeowner insurance market to determine the scope of identified problems & identify potential systemic approaches to eliminate insurance barriers to fair housing choice.

Subtask : Conduct preliminary focus groups with insurance and real estate industry and consumer representative, non-profit developers, and community organizations to identify the nature and scope of issues to be addressed.

The Fair Housing Advisory Board has sponsored four "Realities in Housing" conferences with focus on affirmatively furthering fair housing and the contributing factors of discrimination and segregation as it relates to the real estate, lender, insurance, and property owner/manager industries. These conferences targeted specific audiences use panels, individual focus group discussions, certified trainings provided by consultants, and table discussions based on worksheets and survey results. Additional goals were set to specifically address "blockbusting", "steering" and "redlining" issues within housing-related industries.

Multiple task groups were formed, strategies developed, and goals set as a result of the Heartland 2050 Fair Housing Equity Assessment completed in 2015. Addition planning

efforts include the South Omaha Community Assessment Report, the Community Foundation, “Landscape Project”, Empowerment Network Village Plan.

Goal 5: Promote the access to and utilization of legitimate, non-predatory, and affordable credit services through public education, policy review and advocacy, and the development of alternative financial services readily available to all sectors of the community.

Subtask : Promote the development of alternative legitimate services, non-profit or otherwise, to address identified gaps in financial industry practices, which are currently being filled by predatory practices in: check cashing and payday loan” services

The Fair Housing Center produces training materials and makes presentations to neighborhood groups. The City’s Human Rights and Relations Department produces, posters, brochures, DVD’s, psa’s and distributes HUD materials on Fair Housing and predatory practices.

Omaha 100, Inc. represents a consortium of lending institutions pooling funds to provide mortgage financing to homebuyers and cash subsidies to nonprofit developers. Omaha 100, Inc. helps participating institutions fulfill the needs of the community (quality and affordable housing) while increasing their Community Reinvestment Act activity. The main goal of Omaha 100 is to assist renters in becoming homeowners. Its mission is to provide mortgage loans to low and moderate-income borrowers in order for them to purchase homes at an affordable cost.

The City of Omaha utilizes HOME, CDBG, and Nebraska Affordable Housing Trust Funds to provide down payment assistance for the purchase of newly constructed and/or newly rehabilitated homes. Down payment assistance is provided to purchasers of homes constructed by the nonprofit developers or the City. This assistance is available through Omaha 100, Inc. who also provide the first mortgages.

The City of Omaha allocates HOME funds to the City of Council Bluffs to facilitate single family housing and multifamily development. The City of Council Bluffs provides down payment assistance through a non-profit to assist low and moderate income homebuyers.

The City of Omaha provides CDBG funding to micro-enterprise programs through Catholic Charities and Midland Latino Community Development Corporation.

Loans funded through the City require the owner to gain consent from the City to use equity to secure additional debt. Requests are reviewed to determine the financial stability of the applicant before approval is given for a subordination of debt.

Goal 6: Increase the availability and supply of safe and affordable rental housing stock in Omaha for low and moderate income individuals and families.

A recently approved bill, LB496, allows the use of TIF to finance workforce housing in areas with high unemployment and poverty rates within cities. It defines workforce housing as owner-occupied housing units that cost no more than \$275,000 to build or rental housing units that cost no more than \$200,000 to build. Other requirements have to be met, however, this provides an opportunity to utilize a source of funding that has not been used in Omaha.

Another incentive to encourage the development of affordable housing is in Section 55-785 of Chapter 55 of the Municipal Code in Omaha. The language states that for a development in which residential units are intended for individual sale to owner-occupants, an applicant may reduce the required site area per residential unit by up to 20 percent if they certify that the selling price of a specified percentage of the available units will be no more than 2.25 times the current median income of a family of four established by the HUD. For a development in which residential units are intended for rental or for cooperative ownership by tenants, an applicant may reduce the required site area per residential unit by up to 20 percent if they certify that the monthly rental of a specified percentage of the available units will be no greater than Section 8 Fair Market Rents or any comparable official standard established by HUD for a corresponding size for a period of no less than 5 years. Although this provision exists, they have not been used in development.

The Omaha Municipal Land Bank acquires vacant, abandoned or dilapidated properties throughout Omaha and either renovates or demolishes the property for future use and growth. The Land Bank works with nonprofit agencies, neighborhoods, and the City.

The City Planning Department provides funding for rehabilitation programs that include owner occupied rehab/ and or tenant – Emergency Program, Energy Conservation/Healthy Homes Program, Handyman Program, Full Rehabilitation Program, and Exterior Repair Program.

City Planning also collaborates with other organizations in an effort to provide and assure decent, safe and sanitary housing for low to moderate income persons:

- Rebuilding Together to assist with a roofing program
- Habitat for Humanity in Omaha for a demolition program
- League of Human Dignity for barrier removal
- Lead Hazard Control Program
- EPA soil removal and remediation program

The City of Omaha and Council Bluffs have collaborated with nonprofit and for-profit developers to use HUD and state funds to develop multifamily rentals, senior housing, and housing for the mentally or developmentally disabled, and long term single family rental housing. Nonprofit and for-profit developers use LIHTC, TIF funding, private donations, capital fundraising, private loans, and other funding sources to provide for low and moderate income households.

The City of Omaha uses HUD funding for an investor owned rental rehabilitation program for vacant properties east of 72nd Street. This program is for full rehabilitation, removal of lead hazards, and addressing radon. A funding match is required from the investor to the program and an income eligible tenant (low and moderate income) is required for a period of time. Mobility counseling is provided by Family Housing Advisory Services and Omaha Housing Authority.

Subtask : Recruit non-profit, faith-based, grassroots and other existing community organizations in this effort to ensure efficiency and effectiveness.

City partners with and provides funding to non-profit organizations to develop affordable housing units and market them to LMI persons. The City has also participated as a developer of new construction housing and purchase/rehab/resale of multiple homes to provide housing choice for LMI households.

Habitat For Humanity, GESU Housing, Inc. and Holy Name Housing construct new homes for homeownership and or long term rental. These non-profits use multiple sources of funding to include HUD funds, private foundation funding, capital fund campaigns, in-kind donations, and private loans to construct accessible or visitable, energy efficient, three (3+) bedroom homes

Using Low Income Housing Tax Credits, HUD funds, private loans, foundation grants and other sources, multi-family units are constructed or rehabilitated by non-profit and private developers that provide units for low to moderate income households, housing for persons with disabilities and senior housing. Example of recent developments are; Lofts at 24th Street, St Ann Apartments, Sheltering Tree Housing, Cypress Point,

Shannon Heights, Victory Apartments, and the Sawyer Building Apartments and Landon Court Apartments in Council Bluffs.

The Omaha Housing Authority continues to create homeownership opportunities for public housing residents through the sale of single-family housing on scattered sites and the Section 8 program. OHA provides financial planning and homeownership skills training and assistance to residents in securing first and second mortgages for the purchase of OHA homes.

Subtask: Assist in the recruitment of landlords, developers and others to increase deconcentration by increasing those housing providers willing to participate in the Section 8 Housing Choice Voucher program of OHA

- The city continues to recruit new investor owners to participate in its Rental Rehabilitation program to provide affordable rental units for LMI tenants.
- The city provides OHA tenant-based rental assistance for near homeless families
- The Omaha Housing Authority (OHA) Homeownership Program is designed to provide a comprehensive program to empower residents to make informed choices and decisions throughout the home-buying process, followed by long-term homeownership.

Subtask: Continue to support the cooperative efforts of the City Planning department's code inspectors, the County Health Department, and other agencies to provide a rapid response to correct code and health violations and thus increase the supply of safe, affordable rental housing.

The City of Omaha reviewed their processes of code response and the permit process. Revisions were made to bring the division into alignment to create better efficiency, consistency, and accountability. The data system being used allows for better communication between the inspectors both in the code department and the building, electrical, plumbing inspectors. Licensing requirements were expanded to all contractors working in Omaha must be licensed and registered.

The following codes have been amended or updated:

2006 IBC - International Building Code

2006 IRC - International Residential Code

2006 IMC - International Mechanical Code

Municipal Code - Omaha Municipal Code

2015 OPC - Omaha Plumbing Code

Goal 7: The City of Omaha and the City of Council Bluffs create incentives that would increase the supply of fully accessible housing for rent and for sale as well as units with supportive services readily available

Subtask : Minimum requirements of Section 504 of the Rehabilitation Act be reviewed with the City Planning Department, NIFA, IFA, and Midwest Housing equity with the goal of increasing the local standards to more accurately reflect local need. The City should also consider changes to its building codes to require universal design or adaptable features in all future multi-unit construction.

The minimum requirement is still being met.

Goal 8: Lending institutions in the Consortium area be encouraged to market more aggressively to minority markets as part of their fulfillment of their CRA responsibilities and a good business practice.

Subtask : Omaha and Council Bluffs continue to support bilingual (Spanish), high quality homeownership classes that include education on fair lending practices for the consumers and that offer individual counseling and credit repair at no or minimal cost.

The city contracts with Family Housing Advisory Services (FHAS) to provide its clients with required homebuyer education. These classes are available in English, however, if translation is needed, interpreters are facilitated in the language needed, often with smaller sessions. Homebuyer preparation is also provided by Holy Name Housing and Habitat for Humanity for their prospective buyers.

Goal 9: The City studies the pros and cons of instituting a registration process for all rental units, including routine inspections to ensure the housing stock is maintained at the minimum dwelling standards.

A rental registry system for rental units was developed based upon the registry in LaVista, however, it was not accepted in Omaha. A Vacant and Abandoned Property Ordinance is in effect to provide for the establishment of a registration system, including fees and fines, and institute guidelines for the maintenance and security of abandoned, neglected and vacant properties

Goal 10: The Mayor's Fair Housing Advisory Group be provided with adequate resources to help them carry out their mission to ensure the City is affirmatively furthering fair housing.

The Fair Housing Advisory Board has been afforded a budget to conduct conferences, educational materials and outreach. Funding in the past years has supported the Board in completing several projects:

- Public service announcements regarding Fair Housing and contact information were shown in the 20 Grand Theater repeatedly for 1 month.
- PSA aired on Channel 7 throughout the month of April in celebration of Fair Housing Month.
- Four billboards (2 in English and 2 in Spanish) were posted for 3 months; located at 30th & Bedford, 24th & Martha, 24th & Q, and 38th & Ames.
- Three annual "Realities in Housing" conferences held with focus on the real estate, lender, landlord, property management target groups
- Door hangers with Fair Housing information were distributed by volunteers
- Co-sponsoring several fair housing conferences that were conducted by other groups.

Goal 11: The City develop or sponsor a program of fair housing education, such as a conference or similar event, to provide community education on fair housing issues designed for the general public and for housing providers.

The City participates in the Lincoln Civil Rights conference annually and in several community events such as the NIFA conference, fair housing events throughout the city as well as conducting various housing conferences such as; "Realities in Housing", Table Talk with Inclusive Communities, Inc., and participating in various monthly meetings (Empowerment Network, Omaha 360, Heartland 2050 committees, Refugee Task Force). Brochures, posters and fact sheets are available at all events attended, resource information is provided and expert consultants provided when requested. The Mayor's Office hosted three Economic Inclusion meetings to facilitate the training and inclusion of minorities and women owned businesses into the larger construction opportunities throughout the city. The Small and Emerging Business Program, although not protected class driven, does assist small businesses that may be minority or woman owned with opportunities to participate in larger projects. The Minority Business Enterprise requirement that the City Planning Department monitors, attempts to hold contractors accountable to seek out and hire minorities and women owned business with each federally funded opportunity.

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

Numerous studies have been conducted since the AI was updated in 2010. The common factor throughout all of the documents and data show that the barriers listed as goals in both the 2004 AI and the updated 2010 AI are still the same barriers. These barriers have not been reduced but instead there has been a rise in the contributing factors to the lack of equal opportunity in housing, transportation, education, jobs, and financial services.

The data supports a need for education to the general public as well as private stakeholders. Although an immense amount of work has been done over the years through studies, publications, workshops, conferences, table talks, etc. the contributing factors of NIMBYism, misunderstanding or lack of understanding of fair housing rights, landlord/tenant rights, political will and significant changes in zoning and development requirements have not advanced the actual significant accomplishment to the goals.

The current goals established with this update is reflective of the robust community engagement that was conducted from September 2016 through April 2018. Meetings with stakeholders, neighborhoods, non-profit as well as for profit developers, political entities, public housing residents as well as other stakeholders; that were conducted by both the City, Heartland Workforce, The Empowerment Network, Metropolitan Area Planning Agency (MAPA), the Community Foundation and others formulated goals and strategies that the AI mirrors. The barriers, concerns, and action items are consistent throughout.

An enormous amount of effort is being done to bring groups together to tackle the issues in a cohesive and aggressive way. Fair Housing discussions that include diversity and inclusion in all aspects of the community are at the forefront of most discussions in the City. The AFFH process and Regional Assessment of Fair Housing have brought to the forefront things that the community needs to address. Changes in policies, processes, and education must be made in order to accomplish past and present goals.

Moving forward over the next five years, program partners are equipped with data and strategies. Accomplishing AFH goals will make dynamic changes in barriers to fair housing. Equal access to opportunity will be discussed in the development of housing plans, service plans, and action plans. Providing fair housing education to elected officials, neighborhood leaders, private funders, stakeholders, and residents throughout

the city, will be a priority. Program and collaborative partners are committed to accomplishing past and present fair housing goals.

COUNCIL BLUFFS

The City completed its Analysis of Impediments to Fair Housing Choice in June 2012. Overall, the City and MHA has been successful meeting the smaller goals, however continues to work on the larger, long-term goals.

The following potential impediments were identified:

1. The City should amend its Consolidated Plan to modify its definitions of “area of concentrated minorities” and “area of concentration of low income person.”

This item was completed.

2. The City’s increasing diverse minority population may require language accommodations to ensure that all residents can access City programs and services.

The City works with a local interpreter when needed. Program information is not provided in additional languages—specifically, Spanish. The City will address this concern in the current assessment to better reach these individuals.

3. Members of protected classes are under-represented on City appointed boards and commissions dealing with housing issues.

The City actively recruits individuals of protected classes as board and commission positions become available. Boards and commissions that deal with fair housing currently have the following makeup:

Community Development Advisory Committee (CDAC): gender balanced

- Civil Rights Commission (CRC): gender balanced with two racial minorities and two LGBTQ+ representatives
- Planning Commission: gender balanced
- Zoning Board of Adjustment: gender balanced with one racial minority
- Historic Preservation: gender balanced

4. There is an inadequate supply of affordable rental housing that is accessible to City residents.

Since 2013, the City has constructed two low-to-moderate income multi-family rental projects. One of the 36-unit projects is designed for all units to be adaptable for disabled residents as well as one unit accessible for sensory impairments. The other includes at least two accessible units for mobility impairment and one accessible for sensory impairment.

5. Minority households, in particular Black households, have greater difficulty becoming homeowners because of lower incomes.

The City continues to provide financial assistance in the form of down payment assistance to income qualified home buyers as well as fund homeownership counseling and financial management education for lower income households, particularly minority households. Last year, Family Housing Advisory Services (FHAS) provided counseling for 193 households/375 individuals. Of these, 27 identified as Hispanic, 25 as Black, 1 as Asian, 4 identified as Native American, 14 as Black/White, 5 as Native American/Black and 3 as Other Multiracial.

6. Public transit service is largely limited to day and evening hours, thus restricting accessibility to employment opportunities for persons working evening and overnight shifts.

In 2016, route hours were extended to 11pm instead of ending at 6pm in Council Bluffs. Additionally, the City formed a partnership with Southwest Iowa Transit Agency to provide paratransit service on a contract basis. Public transportation is still limited in the City and continues to be a high priority.

7. The City's supply of decent, affordable housing remains inadequate.

Decent, affordable housing in Council Bluffs continues to be an issue. Since 2012, the City has constructed 28 single-family houses that were given down payment assistance in the amount of \$435,000. Additionally, 72 multi-family rental units have been constructed with 27 earmarked for families at or below the median family income (MFI).

8. The majority of fair housing complaints filed through HUD and ICRC in Council Bluffs involved disability and race as basis for discrimination.

According to the Iowa Civil Rights Commission, Pottawattamie County is comprised of 2.56% of the 1,557 jurisdictional complaints filed in the State of Iowa in FY2016. There

was a slight decrease in the number of employment, housing and public accommodation complaints but a slight increase in education and credit complaints. For Council Bluffs specifically, there have been 10 cases since January 2015 with two cases remaining open. All but one of the complaints were filed with residents in the 51501 zip code. Of the 10 cases, seven were disability, one race, one retaliation and one was multiple categories.

9. The City's Zoning Ordinance is not consistent with the Fair Housing Act.

The Zoning Ordinance was amended to remove the distancing requirements on "family homes" (group homes).

10. The City's 1994 Comprehensive Plan should be updated to reflect specific policies and strategies to address affordable housing needs for all housing types.

The Bluffs Tomorrow 2030: Comprehensive Plan was adopted in September 2014. This plan includes a housing land use plan as well as implementation strategies for interconnecting housing with transportation, education, health care, parks and recreation, and commercial development. The plan outlines five residential land uses including rural residential/agriculture, low-density residential, medium-density residential, high-density residential and multifamily/mixed-use. These different levels of zoning allow the City to customize development to fit the needs of specific areas and retain the character of neighborhoods. Under the "Neighborhood and Housing" goal of "enhance and maintain the City's neighborhoods to provide housing, character, and supporting amenities to retain and attract residents to Council Bluffs," the City identifies the following objectives relating to fair housing:

- i. Recognize and preserve the character of Council Bluffs' individual neighborhoods through contextually appropriate infill development and the maintenance of streets, trees, and other public areas.
- ii. Provide quality senior housing or supportive services to allow senior citizens to remain in the community.
- iii. Minimize the impact of the conversion of single-family structures to multi-family housing.
- iv. Encourage the development of multi-family, townhome, and small-lot single-family housing along existing bus transit lines on Broadway, 23rd Avenue, and in downtown.

- v. Require developers to provide local amenities (i.e. open space, trails, detention, etc.) that benefit residents.

11. There is insufficient evidence to support MHA's compliance with Section 504 for the Rehabilitation Act of 1973.

In January 2017, MHA adopted its Admissions and Continued Occupancy Policy which directly addresses nondiscrimination, policies related to persons with disabilities and violence against women. This policy is published on their website at mhacb.org.

12. Mortgage loan denials and high-cost lending disproportionately affect minority applicants in Council Bluffs, similar to national trends.

Most recent data regarding this impediment is 2008. The City continues to work with FHAS to provide homeowner counseling as well as Iowa Legal Aid in Council Bluffs and the Iowa Civil Rights Commission to combat lending discrimination.

13. The Daily Nonpareil newspaper does not include a publisher's policy. In addition, rental real estate advertisements that prohibit or limit pets may discourage persons with service animals from considering these units.

The Daily Nonpareil's website includes a terms of use section. This outlines the liabilities of BH Media Group, Inc and all government regulations.

Previous goals were examined and discussed during the process to see how many have been accomplished and what areas continued to be problems for Council Bluffs. This helped shape the new goals outlined in the AFH for the City and MHA. Areas we continue to fall short are our need for affordable housing for all family types as well as accessibility needs and transportation. These issues are very large and thus are ongoing. Areas we have excelled are policy updates. All suggested updates are completed.

Municipal Housing Agency has the following goals in its Five Year Plan:

- To provide safe and sanitary living conditions for very low income families while maintaining their rent payments at an affordable level.
- To operate a socially and fiscally sound public housing agency that provides drug free, decent, safe and sanitary housing with a suitable living environment for residents and their families.
- To promote personal, economic and social upward mobility to assist residents to make the transition from subsidized to unsubsidized housing.

- To minimize public housing vacancies and continue to improve turnaround days to maintain MHA's consistent High Performer Status in PHAS
- Housing for the Elderly and Disabled and low income families in our Public Housing units
- Housing for the Elderly, Disabled, and Families in our Section 8 Program
- Continue MHA staff training on housing software and HUD regulation changes
- Maintain the 2015 Green Physical Needs Assessment (GPNA), which will assist MHA in Strategic Planning and a 20-Year Action Plan for Capital Funds Improvements
- Working with Non-Profit Sister Company Municipal Homes, Inc. which will partner with developers, or initiate plans to construct more "affordable housing" in the community for single family, disabled, transitional, and group homes
- Family Self Sufficiency (FSS) is a voluntary program open to all of the Municipal Housing Agency's Housing Choice Voucher participants, which assists families in obtaining the skills that they need to achieve financial independence. Clients are assisted by the FSS Program Coordinator and are referred to other community agencies where clients access services such as education, job training, counseling, job search assistance, financial aid assistance, workshops, support meetings, and other appropriate services to assist the family. We currently encourage all participants to enroll in financial and homeownership classes to help prepare them at the end of their five year Contract of Participation should they choose to purchase a home.

FSS Goals and Objectives:

- Assist more voucher holders in becoming self-sufficient by increasing the program to at least 25 participants
- Update our Action Plan to reflect our program more accurately and completely
- Continue to apply and receive funding for the Program Coordinator position through grant
- Work on building our Program Coordinating Committees (PCC) to allow more resources for participants to utilize
- Utilize available technology to increase program participation and communicate with current and potential participant
- Create a welcoming and educational environment within our office to provide information regarding local resources and activities
- Search for and participate in local vendor events to help promote our agency and spread the awareness of the FSS program opportunities

Municipal Housing Agency's Progress in Meeting Mission and Goals:

- Municipal Housing Agency has increased HC Veterans Affairs Supportive Housing (VASH) Vouchers from 10 to 20 and will be receptive to HUD should anymore become available. The Section 8 Program had 45 participants go off the program in the last 12 months and 11 of those are due to economic betterment.
- Three public housing, two HCV and one board member attended Staff Training on new HUD regulation changes in 2016.
- The FSS Coordinator attended an extensive training for her FSS program. HUD staff met with FSS Coordinator to assure to maximize the benefits of MHA's FSS Program.

Within the past 12 months, Municipal Housing Agency's Family Self Sufficiency Program has had four out of six participants graduate. Amongst these participants, they received \$55,088.31 in escrow funds. One of those graduates went into homeownership and used the money from her escrow account as a large down payment on her home. Another graduate successfully left the Housing Choice Voucher Program because her household income exceeded our income guidelines after obtaining employment from a local employer.

Several facility updates have been completed including fire suppression and alarms, cameras, water and sewer upgrades, roof replacements, and unit updates for general aesthetics and accessibility. Additionally, MHA has completed many major projects to keep up with changes in regulations, such as making both properties completely non-smoking, different regulatory items that must be included in our Admissions and Continued Occupancy Policy, as well as other policies that need to be updated due to situations that have presented themselves over the course of time.

By having these goals and making such improvements as these for the Municipal Housing Agency, they are continuing to uphold the mission: It is the intent of the Municipal Housing Agency to provide affordable, decent, safe and sanitary housing to low income families that will promote economic mobility and a suitable living environment free from discrimination.

The Municipal Housing Agency has received grant money from the Council Bluffs Housing Trust Fund to complete various renovations to our Regal Towers and Dudley Court properties. These grant monies were used to renovate existing units and make them more accessible, through walk-in and roll-in shower renovations, providing high-rise toilets in units, and other accessible accommodations as well. The Municipal Housing Agency will continue to apply for grant monies from the Council Bluffs Housing

Trust Fund to renovate units to make them more accessible, and to combat the issue that the region faces with a lack of accessible units in a range of sizes.

The RAB and tenants give feedback to the Municipal Housing Agency regarding what they would like to see as goals for the Housing Agency. The information is taken from the Resident Advisory Board and tenants, to then be considered for future goals. The Municipal Housing Agency's Public Housing serves mainly elderly and disabled individuals; therefore, many of the goals to renovate the structures are to make the buildings more accessible for the tenants, as well as assist tenants/participants in becoming as self-sufficient as possible.

BELLEVUE

The City of Bellevue completed its previously Analysis of Impediments to Fair Housing Choice in 2014 in conjunction with the 2014-2018 Consolidated Plan. As part of the analysis, the City identified impediments to fair housing in the public sector and private sector as well as identified in both areas. Impediments were identified and the City efforts to address the impediment are listed below.

1. Impediment: An inadequate supply of accessible housing is a problem that plagues most housing markets.

a. Efforts to address the impediment: Through review and updates, visitability has remained a part of the zoning ordinance. The City continues to encourage developers to focus on visitability in new developments. The CDBG Housing Rehabilitation was updated to focus on critical repairs for elderly and disabled homeowners with focus on accessibility. Once a house has been evaluated, any accessibility rehabilitation needed is started immediately following the environmental review completion.

2. Impediment : Access to fair housing information and education could be improved.

a. Efforts to address impediment: The City of Bellevue continues efforts to provide information regarding fair housing to residents. The City maintains a fair housing page on the website and updates the information as needed. Additional agencies, advocacy groups, and housing counseling agencies are used as reference for fair housing questions. While all agencies remain in contact, a fair housing committee has not been formed due to lack of interest and time available to commit to additional meetings at this time.

The City is still working to host a fair housing conference in Bellevue or Sarpy County and hopes to identify and recruit additional partners to assist with hosting a conference for non-profit agencies and private sector businesses.

3. Impediment: Affordable housing has limited access to transportation, social service, and job centers.

Efforts to address impediments : The City participated in the Heartland 2050 planning model for the Omaha-Council Bluffs MSA and work with the surrounding communities to identify and develop plans to increase the amount of affordable housing near transportation opportunities. Continued efforts are needed as MAPA completes a transportation plan for Sarpy County.

Private Sector

1. Impediment: The City of Bellevue lacks available affordable housing choices. There is a lack of larger units (with three or more bedrooms) which is considered to be a fair housing impediment because it disproportionately impacts at least two protected class groups – households with children and extended families, as well as minority households, many of which tend to be larger than white households.

- a. Efforts to address impediments: The City continues to identify and pursue outside funding sources and form partnerships to position itself when additional federal and state funds become available.

Public & Private Sector

1. Impediment: Lack of knowledge by housing consumers of Fair Housing Laws, discriminatory practices, and enforcement agencies and procedures. Further, those members of protected classes that suspecting discrimination may lack the confidence to report the incident or proceed with filing a fair housing complaint because of the investigating entity.

- a. Efforts to address impediments: As mentioned above, the City of Bellevue continues to maintain up to date information for residents regarding fair housing laws and enforcement. Due to limited funding, the City has not partnered with a local fair housing agency to offer outreach and information directly to residents.

2. Impediment: The City of Bellevue staff lacks knowledge of the Limited English Proficiency Plan and the requirements within. The LEP population although it does not represent a wide variety of languages and dialects yet, is present in the Bellevue area and is growing. Translation services can be costly to provide and it can be difficult to secure quality translators.

a. Efforts to address impediments : The City of Bellevue worked with all City Departments to develop a LEP plan and include all current available options for city services. In addition, the collaboration assisted to improve coordination of LEP efforts within Departments and the city limits to ensure all close, existing resources are utilized first. The City has worked with other area agency to create a comprehensive list of service providers as a resource.

The City of Bellevue utilizes experiences and knowledge from efforts to address past identified fair housing impediments in moving forward with future fair housing plans. A review of past impediments and efforts to address the need were used a starting point to develop a new plan. Partnerships and collaboration efforts developed in the previous plan will be used to develop future efforts to address fair housing issues on an area wide basis.

SECTION V.

Fair Housing Analysis

According to the HUD Assessment of Fair Housing Tool (AFHT), Section V includes the following information:

- A. Demographic Summary
- B. General Issues
 - i. Segregation/Integration
 - ii. Racially and/or Ethnically Concentrated Areas of Poverty (R/ECAPs)
 - iii. Disparities in Access to Opportunity
 - iv. Disproportionate Housing Needs
- C. Publicly Supported Housing Analysis
- D. Disability and Access Analysis
- E. Fair Housing Enforcement, Outreach Capacity, and Resources

Regional Versus Jurisdiction Analysis

The “region” being assessed for this Regional AFH encompasses a two-state, eight-county Metropolitan Statistical Area (MSA). The counties include Douglas, Sarpy, Cass, Washington and Saunders in Nebraska, and Pottawattamie, Mills, and Harrison in Iowa.

HUD defines a “jurisdiction” as, “the legal authority of a government body to enforce the law in a given set of circumstances” (24 CFR § 92.105). For the purpose of this assessment, the jurisdictions refer to the cities participating in the Assessment of Fair Housing (AFH), including Omaha, Council Bluffs, and Bellevue. Omaha Housing Authority (OHA), Douglas County Housing Authority (DCHA), Council Bluffs Municipal Housing Agency (MHA), and the Bellevue Housing Authority (BHA) are participating partners. The Council Bluffs/City of Omaha Consortium is the lead entity for this AFH.

This section will provide an overview of the data and analysis for the participating jurisdictions. The trends found in jurisdictions will be compared to the larger region. Details for cities in counties included in the region, but who are non-participating partners (eg. Fremont or Wahoo) will not be included in the analysis unless they are relevant to large-scale housing trends.

The seven program partners collaborated to identify regional issues and goals based on HUD provided data, local data, and community input. The jurisdictions also worked separately to provide information and analysis on questions identified by HUD to identify impediments to fair housing for their community. The sections created by and for a specific jurisdiction will be color coordinated by City as follows:

Omaha

Council Bluffs

Bellevue

When necessary, information created by the Public Housing authorities will also be identified using the acronym associated with the corresponding housing authority.

Omaha Housing Authority- OHA

Douglas County Housing Authority- DCHA

Council Bluffs Municipal Housing Agency- MHA

Bellevue Housing Authority- BHA

Many maps and tables included in the assessment will list the Department of Housing and Urban Development (HUD) as a source. These maps and tables were provided through the AFFH Data and Mapping Tool created to assist regional partners in the fair housing analysis. All tables and data can be accessed online at: <https://egis.hud.gov/affht/>.

Each map in the tool has a legend that identifies information about the population or other features relevant to the map including: race, ethnicity, national origin, languages spoken, types of publicly supported housing, disability by type, and defined areas. The following legends are associated with the maps included in this assessment:

Map Info **Legend** TOC

Jurisdiction


Region


Demographics 2010
 1 Dot = 75

-  White, Non-Hispanic
-  Black, Non-Hispanic
-  Native American, Non-Hispanic
-  Asian/Pacific Islander, Non-Hispanic
-  Hispanic
-  Other, Non-Hispanic
-  Multi-racial, Non-Hispanic

TRACT


R/ECAP


Map Info **Legend** TOC

Jurisdiction


Region


**National Origin [Jurisdiction]
 (Top 5 most populous)**
 1 Dot = 25 People

-  Mexico
-  India
-  El Salvador
-  Guatemala
-  Thailand

TRACT


R/ECAP


Map Info **Legend** TOC

Jurisdiction


Region


Limited English Proficiency [Jurisdiction] (Top 5 most populous)
 1 Dot = 75 People

-  Spanish
-  Other Asian Language
-  African
-  Chinese
-  Other Indic Language

TRACT


R/ECAP


Map Info **Legend** TOC

Jurisdiction


Region


Public Housing

-  Public Housing
-  Scattered Sites

Other Multifamily


Project-Based Section 8


Low Income Housing Tax Credit


TRACT


R/ECAP


Map Info **Legend** TOC

Jurisdiction


Region


Disability
 1 Dot = 75
 Hearing Disability
 Vision Disability
 Cognitive Disability

TRACT


R/ECAP


Map Info **Legend** TOC

Jurisdiction


Region


Disability
 1 Dot = 75
 Ambulatory Disability
 Self-Care Disability
 Independent Living Disability

TRACT


R/ECAP


OMAHA

Omaha is the largest city in Nebraska in both area and population. There are over 135 active neighborhood associations in Omaha. These associations are organized under the umbrella of six Neighborhood Alliances which follow natural and constructed geographic boundaries significant to the Omaha area. For the purpose of this document, references to areas of the city will follow the Alliance boundaries unless otherwise specified.

- Northwest Omaha - Alliance Boundaries: Dodge Street to Washington County Line, 72nd Street to Elkhorn River
- Southwest Omaha - Alliance Boundaries: Dodge Street to Harrison Street, 72nd Street to Elkhorn River
- Midtown - Alliance Boundaries: 24th Street to 72nd Street, I-80 to Cuming Street
- North (Northeastern Omaha) - North of Dodge Street from 72nd Street to the Missouri River. Alliance Boundaries: Zip codes 68104, 68110, 68111, 68112, and 68131
- North 24th Street Corridor Alliance Boundaries: 24th and Ames Street to 24th and Cuming Street (This area is a business district within the “North Omaha” designation)
- South (Southeastern Omaha) - Boundaries: 72nd Street to Missouri River, 72nd & Harrison Street to Dodge Street

COUNCIL BLUFFS

Council Bluffs is comprised of several distinct neighborhoods. For the purpose of the AFH, these neighborhoods have been simplified based on location and similarities to adjacent neighborhoods.

1. Downtown: from Kimball Avenue along Kaneshville/West Broadway to South 8th Street and from Kaneshville/West Broadway south to 6th Avenue
2. Mid-City: from West Broadway south to 9th Avenue and from South 8th Street west to South 16th Street
3. Bluff-Willow: includes the area east of Downtown and the adjacent historic neighborhoods as well as Fairmont Park
4. Kaneshville-Tinley: from Avenue G south to West Broadway and from Scott Street west to North 16th Street.
5. North End: area extending from North Broadway and subdivisions to the city limits and from Sims Avenue to North 10th Street
6. West End: from Big Lake Road south to 13th Avenue and from North 16th Street west to the Missouri River

7. South End: from 9th Avenue south to Interstate 29 and from South 6th Street west to 19th Avenue
8. Twin City-Malmore Acres: area south of Interstate 29 following Veterans Memorial Highway and from Indian Creek to city limits
9. Lake Manawa: subdivisions east of Lake Manawa
10. East End: newer area to the east of Bluff-Willow and the North End to the city limits

BELLEVUE

The City of Bellevue, one of the oldest community in Nebraska, has grown from a fur trading post in 1822 to a bustling community encompassing both small business and large corporations as well as home to Offutt Air Force Base and the 55th Wing. Bellevue is the largest city in Sarpy County, and the third largest city in Nebraska following Omaha and Lincoln experiencing continual growth in previous decades.

Development in Bellevue began along the Missouri River which creates the eastern border of the municipality and the State of Nebraska. The oldest residential and commercial developments are located in this area of Bellevue which includes Olde Towne Bellevue, Fontenelle and along Bellevue Boulevard. This area also provided residential housing for Offutt Air Force Base in southern Bellevue, which grew from Fort Crook in the late 1800s to include aviation use during World War I and Offutt Field in 1920s. The installation continued to grow being renamed Offutt Air Force Base and home to Strategic Air Command in 1948. Offutt Air Force Base has been a catalyst for development and is the area's largest employer with planning and development in the area also impacted by military housing and the Air Installation Compatibility Use Zone.

Development in Bellevue continued to move west meeting with residential development in northern Bellevue which expanded from South Omaha and Douglas County. The completion of 75 Highway north into Omaha assisted with further development west into the area of northwest Bellevue. The southwest area of Bellevue has been the most recent area to see a boom in development. Future development in Bellevue does face limitation of available land for development. Bellevue is becoming landlocked with the Missouri River creating the eastern boundary, the Sarpy and Douglas County line the northern boundary, Offutt Air Force Base and Highway 34 on the south, and city of Papillion on the west.

A. Demographic Summary

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

Table V-1. Population Growth and Percentage Change

	1990	2000	2010	Estimate 2016	% change 1990-2000	% change 2000-2010	% change 1990-2016
Region	685,797	767,041	865,350	904,834	11.85%	12.82%	31.94%
Omaha	335,795	390,007	408,958	443,072	16.14%	4.86%	31.95%
Council Bluffs	54,315	58,268	62,326	62,597	7.28%	6.96%	15.25%
Bellevue	30,982	44,382	50,137	52,993	43.25%	12.97%	71.04%

Sources: Social Explorer Dataset(SE), Census 1990, Social Explorer; U.S. Census Bureau, Social Explorer Tables(SE), Census 2000, U.S. Census Bureau and Social Explorer, Social Explorer Tables(SE), Census 2010, Census Bureau; Social Explorer, Social Explorer Tables: ACS 2016 (5-Year Estimates)(SE), ACS 2016 (5-Year Estimates), Social Explorer; U.S. Census Bureau

The Omaha Council Bluffs region has experienced growth in the total population from 1990 to 2016. According to the Heartland 2050 Vision (Heartland 2050 Vision, 2014) the eight county region is projected to increase in total population to 1,228,634 by the year 2050. This projection includes a population growth in all counties with the exception of Harrison County, IA. Sarpy county is anticipating the largest growth, with a current projection of an additional 149,000 residents by 2050, almost doubling the current population.

All participating jurisdictions have also seen total population growth from 1990 to 2016. Omaha's growth over the period is almost identical to the growth of the region. Although Council Bluffs had a lower percentage of total population growth, it still increased steadily over the 26 year period. The city of Bellevue experienced the greatest change in population, with more than double the percentage growth as the region and other participating jurisdictions.

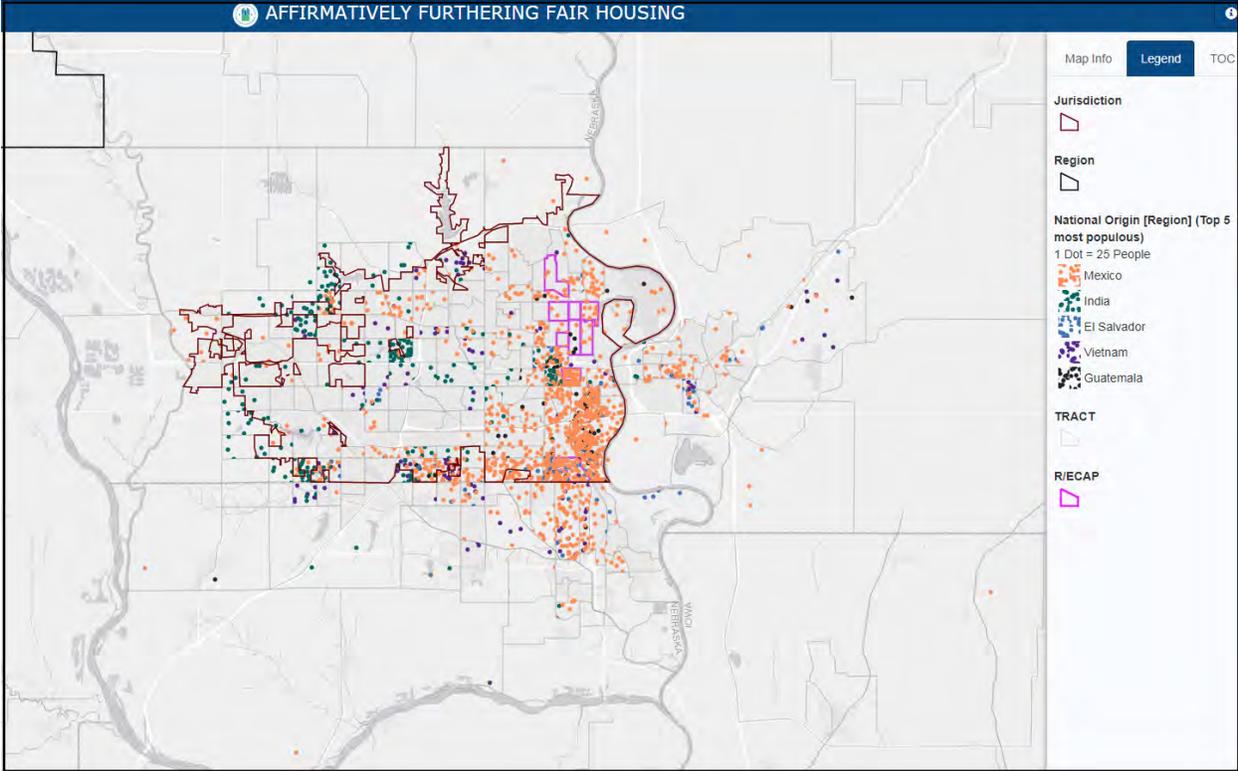
Table V-2. Regional Demographic Trends

	(Omaha-Council Bluffs, NE-IA) Region							
	1990 Trend		2000 Trend		2010 Trend		Current	
Race/Ethnicity	#	%	#	%	#	%	#	%
White, Non-Hispanic	608,068	88.65%	642,805	83.80%	681,172	78.72%	681,172	78.72%
Black, Non-Hispanic	50,830	7.41%	63,236	8.24%	75,916	8.77%	66,864	7.73%
Hispanic	16,664	2.43%	40,207	5.24%	77,508	8.96%	77,508	8.96%
Asian or Pacific Islander, Non-Hispanic	6,138	0.89%	13,605	1.77%	22,557	2.61%	18,318	2.12%
Native American, Non-Hispanic	2,978	0.43%	5,629	0.73%	6,730	0.78%	3,653	0.42%
National Origin								
Foreign-born	15,147	2.21%	34,798	4.54%	53,520	6.18%	59,651	6.89%
LEP								
Limited English Proficiency	9,327	1.36%	24,233	3.16%	34,080	3.94%	40,061	4.63%
Sex								
Male	333,324	48.60%	376,882	49.13%	426,917	49.33%	426,917	49.33%
Female	352,473	51.40%	390,159	50.87%	438,433	50.67%	438,433	50.67%
Age								
Under 18	191,164	27.87%	213,992	27.90%	227,193	26.25%	227,193	26.25%
18-64	418,813	61.07%	469,103	61.16%	542,059	62.64%	542,059	62.64%
65+	75,820	11.06%	83,946	10.94%	96,098	11.11%	96,098	11.11%
Family Type								
Families with children	94,128	51.94%	92,047	50.52%	105,798	48.23%	105,798	48.23%

Source: HUD Table 2 Demographic Trends

The demographics of the region mirror the trends of the participating jurisdictions. Between 1990 and 2010, the White, Non-Hispanic population in the region decreased by 9.93 percentage points. Each of the other racial/ethnic population categories increased in number and in proportion. Black, Hispanic, Asian or Pacific Islander, and Native American populations all increased over the same 20 year period. The Hispanic population had the largest growth in the region, increasing from 2.43% in 1990 to 8.96% in 2010.

Figure V -1. NE IA Region and National Origin



Source: HUD MAP 3 National Origin (Dot Density 1 to 25)

The number of foreign-born residents and persons with limited English proficiency also increased from 1990 to 2010. According to the Equitable Growth Profile of the Omaha-Council Bluffs Region, data from a five year average showed that in 2012 15% of all children in the region had at least one immigrant parent (PolicyLink & PERE, 2014).

Table V-3 NE IA Region National Origin

National Origin			
#1 country of origin	Mexico	24,843	3.06%
#2 country of origin	India	3,433	0.42%
#3 country of origin	El Salvador	2,272	0.28%
#4 country of origin	Vietnam	2,013	0.25%
#5 country of origin	Guatemala	1,710	0.21%
#6 country of origin	China excl. Hong Kong & Taiwan	1,493	0.18%
#7 country of origin	Korea	1,404	0.17%
#8 country of origin	Thailand	1,326	0.16%
#9 country of origin	Philippines	1,311	0.16%
#10 country of origin	Burma	1,056	0.13%

Source: HUD Table 1 Demographics NE-IA Region

According to HUD Table 1, across the region the number one country of origin for foreign-born residents is Mexico at 3.06% and the number one language for limited English proficiency residents is Spanish. All other origins and languages make up less than 1% of the population. India, El Salvador, Vietnam, Guatemala, and China are the next five most populous national origin groups.

The remaining categories in demographics trends for the region from 1990 to 2010 reflect minimal changes. The number of males increased slightly over time, but are almost equal in 2010 with 49.33% of the region identifying as male and 50.67% female. Trends in age groups fluctuated less than 2% in a category over the twenty year period. The current demographics show the region having 26.25% of persons under age 18, 62.64% of persons ages 18-64, and 11.11% of the population over 65 years of age. According to 2012 data from the Equitable Growth Profile, Hispanic residents have a median age of 23 compared to a median age of 27 for residents who identify as Black, and median age of 38 for the White, Non-Hispanic population in the region (PolicyLink & PERE 2014). Families with children have decreased slightly from 51.94% in 1990 to 48.23% in 2010.

Table V-4 Demographic Trends for Jurisdictions

OMA/CB Regional Demographic Trends Percentage of Population 1990, 2000, 2010									
	Omaha			Council Bluffs			Bellevue		
Race/ Ethnicity	1990	2000	2010	1990	2000	2010	1990	2000	2010
White, Non-Hispanic	83.73%	76.47%	68.67%	96.18%	92.78%	87.29%	87.83%	83.26%	76.42%
Black, Non-Hispanic	11.72%	13.24%	14.53%	0.75%	1.32%	2.45%	5.88%	6.84%	7.35%
Hispanic	2.83%	7.19%	12.72%	2.34%	4.26%	8.25%	3.78%	5.65%	11.57%
Asian/Pacific Islander	0.96%	2.05%	2.99%	0.36%	0.82%	1.04%	2.04%	3.13%	3.52%
Native American	0.56%	0.83%	0.86%	0.22%	0.71%	0.89%	0.31%	0.82%	0.94%
National Origin									
Foreign-born	2.69%	6.30%	8.90%	0.99%	2.61%	4.01%	3.75%	5.29%	8.42%
LEP (Limited English Proficiency)									
LEP	1.69%	4.48%	5.94%	.98%	1.96%	3.45%	1.64%	2.77%	4.92%
Sex									
Male	47.99%	48.86%	49.16%	47.27%	48.45%	48.70%	49.98%	49.60%	49.28%
Female	52.01%	51.14%	50.84%	52.73%	51.54%	51.30%	50.02%	50.40%	50.72%
Age									
Under 18	26.59%	26.81%	25.25%	27.00%	26.48%	24.18%	29.38%	28.72%	26.70%
18-64	61.62%	61.82%	63.59%	59.60%	60.29%	62.33%	65.51%	62.37%	62.03%
65+	11.78%	11.37%	11.16%	13.40%	13.23%	13.49%	6.09%	8.91%	11.27%
Family Type									
Families with children	50.59%	50.32%	47.92%	47.81%	44.09%	44.09%	54.00%	50.54%	47.68%

Source: HUD Table 2 Demographic Trends

Demographic Trends

Similar to the trends across the region, from 1990 to 2010 the racial and ethnic compositions of Omaha, Council Bluffs, and Bellevue continue to trend toward greater diversity. The White, Non-Hispanic population shows a decline in proportion and number; however, this population remains the largest racial group by a significant margin.

Omaha's population reflected the greatest decrease in percentage of White residents and the greatest increase in percentage of all other categories with the exception of Native Americans. Council Bluffs saw the smallest percentage of decrease in the White population and the least amount of growth in all other areas with the exception of the Native American population. The Native American population in both Council Bluffs and Bellevue both doubled, but remains at less than 1% of the population for each city.

The most measurable change in demographics for all three cities was the increase in the Hispanic population. In the case of Bellevue and Council Bluffs, the number of Hispanic residents more than tripled between 1990 and 2010. In Omaha, Hispanic residents made up 12.72% of the population in 2010, which is more than five times greater in comparison to 1990.

All jurisdictions also experienced steady growth in foreign-born residents between 1990 and 2010. Omaha's foreign-born population increased from 10,220 in 1990 to nearly 38,000 in 2010, comprising nearly nine percent of the population. Bellevue experienced similar growth with 8.42% of the total population in 2010 identifying as foreign-born. Although only 4.01% of the residents of Council Bluffs are foreign-born, the population has quadrupled from less than 1% in 1990. Residents having limited English proficiency (LEP) also increased for all three jurisdictions as the foreign-born population increased. The number one LEP identified language for all jurisdictions was Spanish.

The small gap between the number of females and males in the population narrowed between 1990 and 2010, with a slight increase of males in both Omaha and Council Bluffs. The number of women increased in Bellevue, by under 1%.

Omaha and Council Bluffs have similar trends in age fluctuations from 1990 to 2010. Indications of an aging population are evident, but subtle. The largest category, the population of 18 to 64, increased in proportion by approximately two percentage points over the 20 year period. Baby boomers make up a large portion of this age category, which is anticipated to cause an increase in the category of people 65 years and older in future decades. This population did see a decline from 1990 to 2010. In contrast, Bellevue has already experienced an increase of 5% in the 65 years and older category over the same period. According to 2010 Census Data, the average age for a resident of Omaha is 33.5 years, for Council Bluffs 36.6 years, and for Bellevue 33.6 years.

All jurisdictions experienced a decrease in persons under age 18. This is also reflected in the decrease in the number of families with children in the same areas from 1990 to 2010. According to 2010 US Census Data, the average size of households in Omaha for Omaha is 2.53, for Council Bluffs 2.43, and for Bellevue 2.62.

Table V-5 Regional Disability by Type

Disability Type		
Hearing difficulty	27,478	3.44%
Vision difficulty	14,601	1.83%
Cognitive difficulty	32,394	4.06%
Ambulatory difficulty	42,837	5.37%
Self-care difficulty	15,027	1.88%
Independent living difficulty	27,896	3.50%

Source: HUD Table 1 Demographics

HUD demographics for the disability community lists the number and percentage of residents in the region according to disability type. According to HUD Table 1, the number one reported disability type is ambulatory difficulty, followed by cognitive difficulties and difficulty with independent living. In the region, 42,837 residents were identified as having ambulatory difficulty, highlighting a need for accessible housing and housing accommodations. Additional demographic details for the disability community can be found in Section V-D Disability and Access.

B. General Issues

The issues discussed in this section address additional trends in regional demographics. HUD requests that the following topics be included under “General Issues”:

- i. Segregation and Integration
- ii. Racially and/or Ethnically Concentrated Areas of Poverty (R/ECAPS)
- iii. Disparities in Access to Opportunity
 - a. Education
 - b. Employment
 - c. Transportation
 - d. Low Poverty Neighborhoods
 - e. Environmentally Healthy Neighborhoods
 - f. Patterns in Disparities
- iv. Disproportionate Housing Needs

i. Segregation/Integration

Part 1. Analysis

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

The Dissimilarity Index (DI), is used to measure segregation by representing how equally or unequally racial and/or ethnic groups are distributed across a geographic area. HUD's DI tool uses the White, Non-Hispanic group as the base for comparison of other racial and ethnic distribution. The DI has a range of values to aid in the evaluation of levels of segregations. Index scores between 0 and 39 indicate no or low segregation, values between 40 and 54 indicate moderate segregation, and values between 55 and 100 indicate a high level of segregation.

Table V-6 Dissimilarity Index

Omaha-Council Bluffs Region				
Racial/Ethnic Dissimilarity Index	1990	2000	2010	Current
Non-White/White	55.35	49.86	44.49	49.78
Black/White	71.47	65.38	58.21	64.70
Hispanic/White	38.76	48.90	48.79	51.25
Asian or Pacific Islander/White	34.58	34.32	33.23	41.50
Omaha				
Racial/Ethnic Dissimilarity Index	1990	2000	2010	Current
Non-White/White	57.80	51.28	46.36	51.07
Black/White	72.84	65.81	58.32	63.44
Hispanic/White	41.37	54.16	54.24	56.95
Asian or Pacific Islander/White	24.27	26.84	29.39	39.84

Council Bluffs				
Racial/Ethnic Dissimilarity Index	1990	2000	2010	Current
Non-White/White	25.05	22.63	20.71	26.43
Black/White	40.90	26.19	21.84	39.37
Hispanic/White	25.70	25.34	25.44	27.74
Asian or Pacific Islander/White	21.45	13.69	17.90	29.23
Bellevue				
Racial/Ethnic Dissimilarity Index	1990	2000	2010	Current
Non-White/White	15.94	15.33	13.94	20.05
Black/White	21.37	22.14	20.27	26.37
Hispanic/White	11.55	18.61	24.35	28.32
Asian or Pacific Islander/White	25.05	19.61	14.19	24.87

Source: HUD Table 3 Racial/Ethnic Dissimilarity Trends

According to HUD’s suggestions in regard to the Dissimilarity Index Ranges, the Omaha Council Bluffs Region has moderate to high levels of segregation in all categories. The region has experienced an increase in segregation levels from 1990 to the present in the distribution between Hispanic and Asian or Pacific Islander identifying residents and White residents. This level is currently considered moderate segregation. Although there has been a decrease in segregation in the comparison between White and Non-White residents over the same period, the current rating shows moderate levels of segregation in the region. The comparison between distribution of White and Black residents indicates the highest segregation in the region. Index numbers have decreased from 1990 to current, but have increased from 2010 to the present and segregation levels remain high.

The protected classes measured by the DI indicate that across the region in each participating jurisdiction, Black, Non-Hispanic residents experience the highest levels of segregation, followed by Hispanic residents. According to the dissimilarity index, Omaha

has a higher index score for segregation between Non-White and White residents than the region; however, Omaha also has the largest population of Non-White residents in the region. The DI also shows Omaha having higher levels of segregation than Council Bluffs and Bellevue in all categories of comparison.

The City of Omaha borders Council Bluffs to the west and Bellevue to the north, yet the percentage of minority residents is higher for Omaha than either city. The percentage of the population that identifies as Black, Non-Hispanic in Omaha is double that of Bellevue's population and almost seven times greater than the percentage of Black residents in Council Bluffs. Regardless of population size, the increase in percentage of minority residents should be considered. While Bellevue and Council Bluffs have lower DI index scores than Omaha, these jurisdictions have notably fewer minority residents. Additional factors impacting the lack of migration of minority residents from eastern Omaha into the surrounding cities should be explored.

OMAHA

Similar to the region, Omaha has moderate to high levels of segregation in every comparison across the Dissimilarity Index. Although a decrease occurred from 1990 to 2010 in the scores comparing Non-White and White residents and Black and White residents, there was an increase in segregation over the same period when comparing White residents to Hispanic and Asian or Pacific Islanders. All categories saw an increase in segregation when comparing 2010 and current scores. Segregation levels comparing Non-White and Asian Pacific Islander to White are moderate, and Black and Hispanic to White segregation levels are high.

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Although Council Bluffs has a smaller population of Non-White residents compared to Omaha and the Region, according to the dissimilarity index, it also has lower levels of segregation than Omaha and the Region in all categories. The scores for Council Bluffs indicate low levels of segregation in all categories in 2010, but a spike in the index scores between 2010 and the current year for all groups increased the Black and White distribution to a moderate segregation level. There was also an increase of over 11 points in the segregation of Asian or Pacific Islander and White residents between 2010 and the current year.

BELLEVUE

According to the Dissimilarity Index, Bellevue experiences the lowest levels of segregation of the three jurisdictions with the exception of the distribution of Hispanic and White residents. Bellevue currently has scores that indicate low segregation, and has experienced a decrease in most categories from 1990 to 2010. However, as the Hispanic population in Bellevue has increased from 1990 to 2010 and into the current year, the DI index scores have also increased. Bellevue experience the same spike in segregation as the surrounding region with numbers rising between 2010 and the current year.

In Bellevue, Hispanic households experience the highest levels of segregation for the jurisdiction followed closely by Black and Asian households. There was a decrease in the average Dissimilarity Index for Non-White, Black, and Asians between 1990 and 2010. This could be due to annexation of additional land by the City of Bellevue. This could also cause questions with the data provided due to the level of difference between 2010 and current levels.

Overall, these dissimilarly index values are significantly lower than the Omaha-Council Bluffs Region where Black households experience the most segregation with a dissimilarity index of 64.70, which is 36.40 points higher than the highest dissimilarity index in Bellevue.

The segregation of Hispanic families in Bellevue has risen over the past 25 years indicated by the increase of the dissimilarity index from 11.55 to 28.32. The majority of Hispanic residents reside in northern Bellevue which is closer to Douglas County, in southeastern Omaha, where a large population of Hispanic households are located.

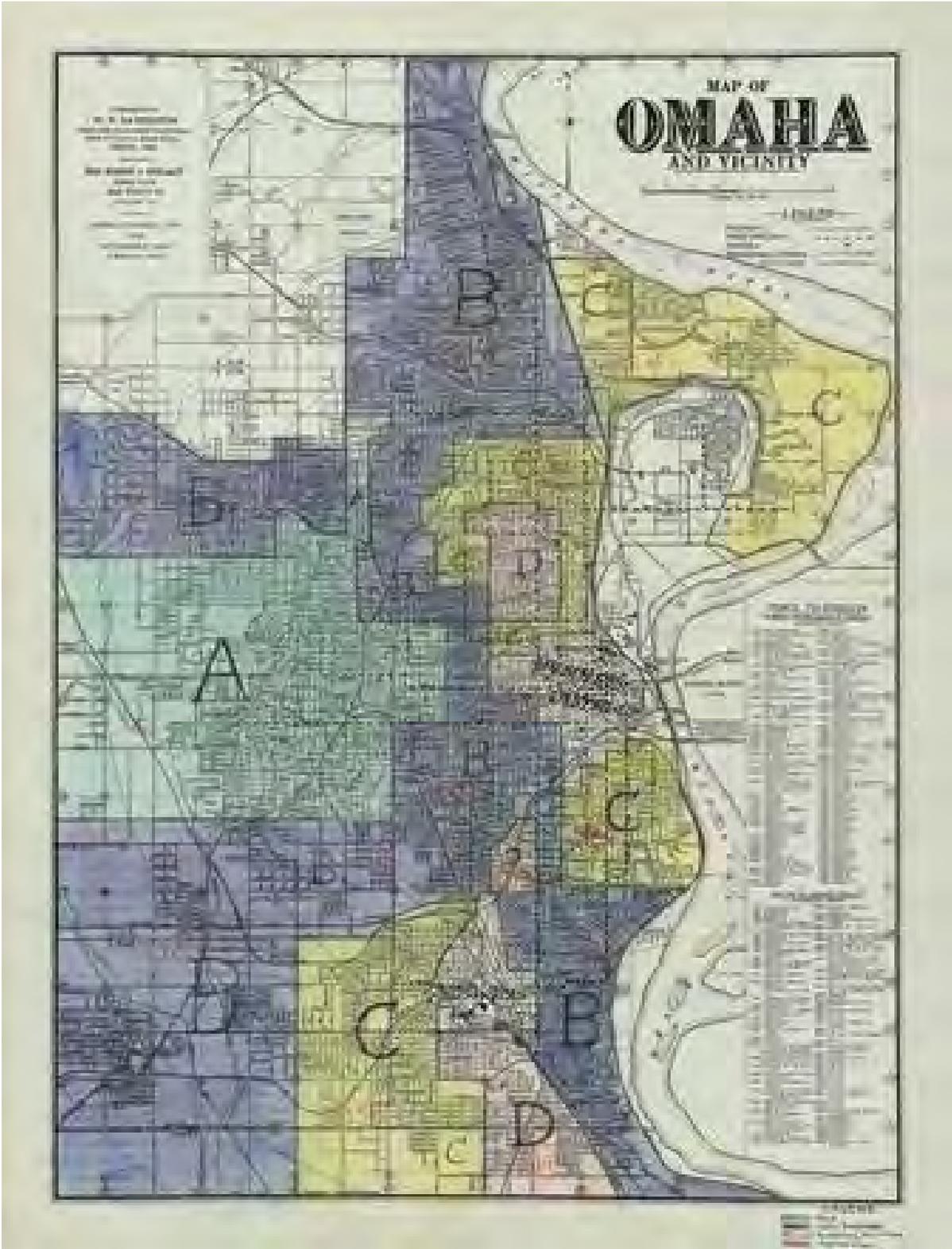
b. Identify areas in the jurisdiction and region with relatively high segregation and integration by race/ethnicity , national origin, or LEP group, and indicate the predominant groups living in each area.

OMAHA

Many areas and communities with high levels of segregation in the Omaha-Council Bluffs region are the result of ordinances/practices that began over a century ago. In 1920, housing segregation was being driven by the federal government agency, Home Owners' Loan Corporation (HOLC) through a practice known as "redlining". This agency was responsible for working with lenders and developers to create a security map that would ultimately determine areas where home loans/mortgages should be issued. These maps designated areas as green (best), blue (still desirable), yellow (definitely declining), and red (hazardous). Areas that were predominantly Black or Hispanic were labeled red (hazardous) and areas that were mostly White were either green (best) or blue (still desirable).

The hazardous or declining designation crippled many Black and Hispanic communities across the nation. The labels prevented investment in the form of home and business loans, therefore stifling economic development for redlined neighborhoods. Areas in North and South Omaha, labeled "colored", did not have access to federal mortgages, limiting the ability of minority residents to secure housing, accumulate wealth, and/or invest in their own neighborhoods. While the Fair Housing Act of 1968 ended legal discrimination through redlining, the impact remains today.

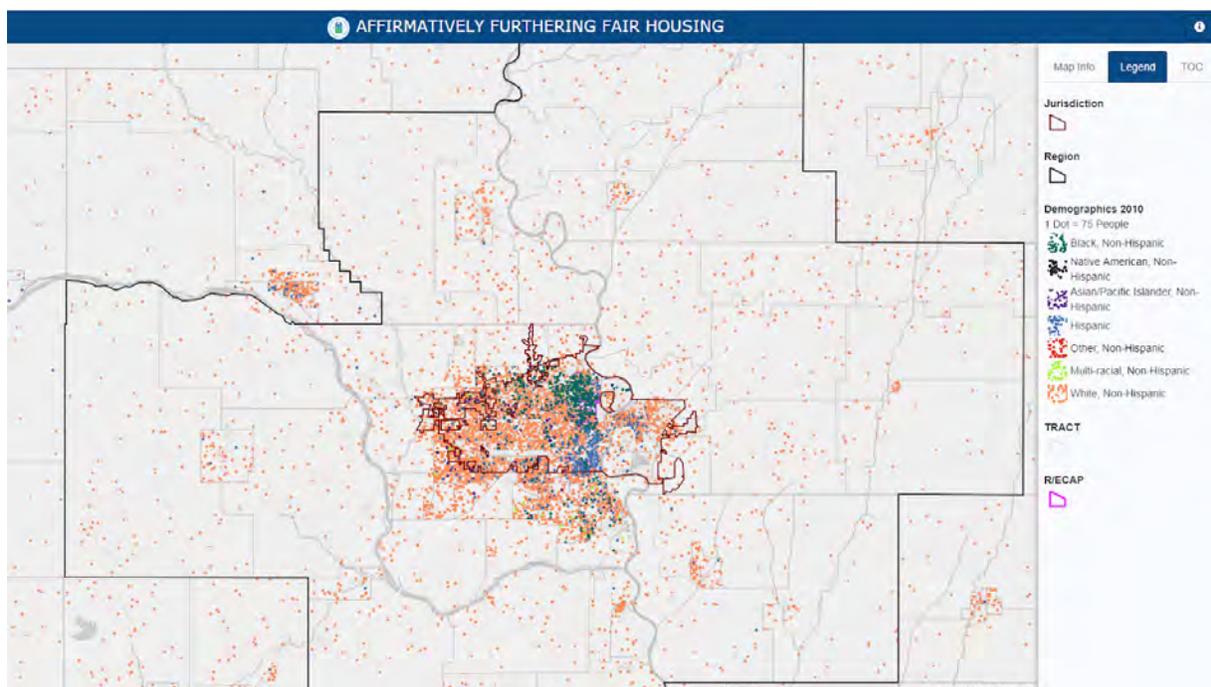
Figure V-2 HOLC Redlining Map Omaha 1935



Source: 1935 HOLC Redlining Map, Omaha and Vicinity -CREDIT PALMA STRAND

The same areas of North and South Omaha designated as “colored” in 1935 currently have the highest concentrations of Non-White residents across the eight county region today. The same northeastern and southeastern portions of Omaha have a majority of the oldest housing stock, highest number of environmental concerns, greatest housing burden, largest amount of publicly supported housing, but also the most affordable housing across the region. These factors contribute to the segregation of people of color, the LEP community, elderly persons, and persons in publicly supported housing to the census tract and neighborhoods that were designated “declining” and “dangerous” in the 1920’s.

Figure V - 3. Omaha-Council Bluffs Regional Demographics

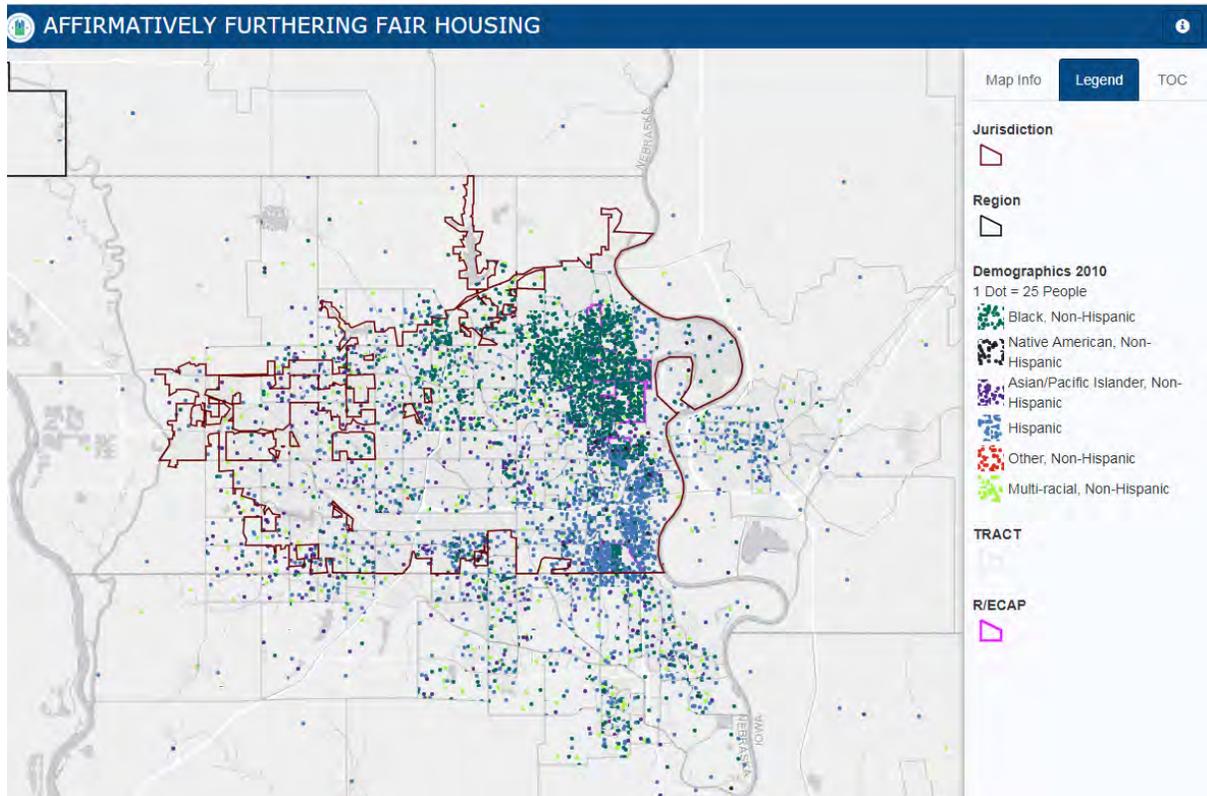


Source: HUD Map 1 Race//Ethnicity

Map 1 from the HUD Data & Mapping Tool is used to identify areas with high segregation and/or integration. Demographic groups are color coded as follows: Non-Hispanic White (orange dots), Black (green dots), and Hispanic (blue dots), Asian/Pacific Islander non-Hispanic (purple dots) and Multiracial (light green dots). The map reveals segregation patterns in the Omaha-Council Bluffs region. The majority of the population across the region is white, but obvious concentrations of Non-White residents are present in Omaha, Council Bluffs, and Bellevue. As mentioned in the previous section, the majority of these residents reside in Omaha. These cities also have the highest populations in the region. Although an increase in total population may

naturally lead to a more diverse population, the following map (HUD Map 1), shows Non-White persons are further segregated to specific areas within the jurisdictions.

Figure V - 4 Omaha, Council Bluffs, and Bellevue Demographics

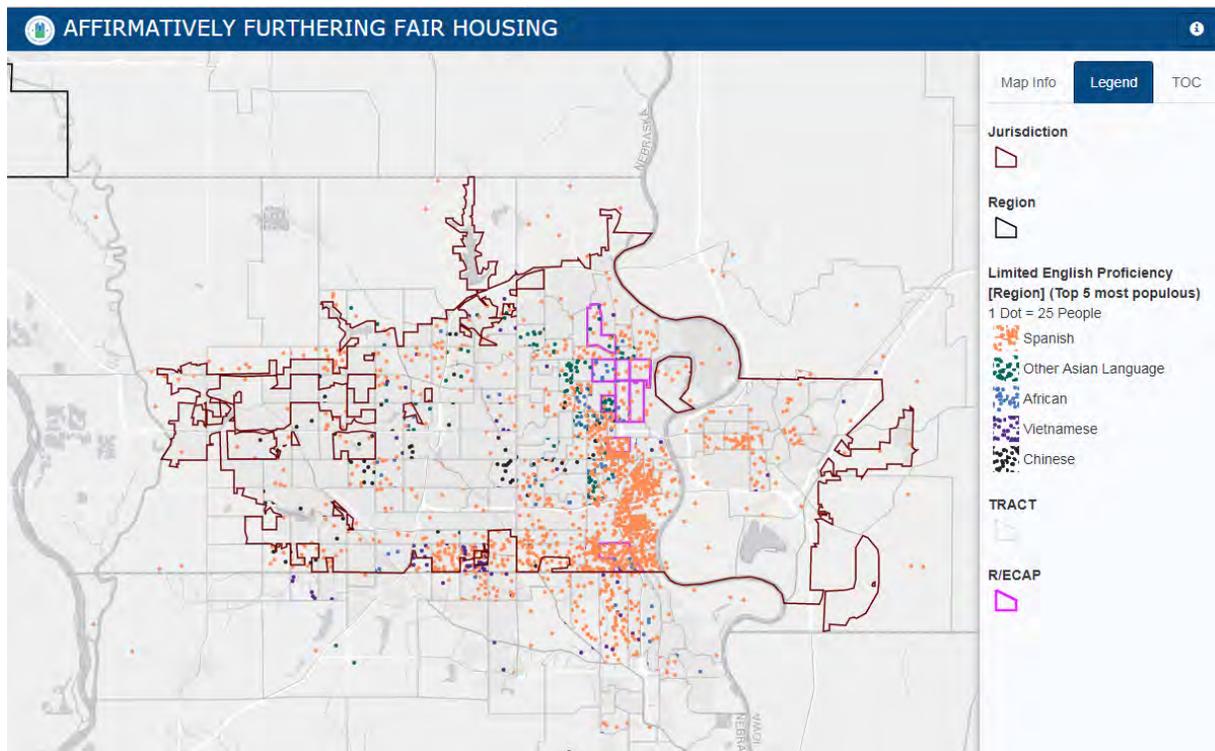


Source: HUD Map 1 Omaha Jurisdiction, Race//Ethnicity, Non-White Population, Dot Density 1:25

When removing White, Non-Hispanic residents from Map 1, the concentration of different races and ethnicities to specific geographic areas becomes even more apparent, especially in Omaha. Residents with LEP are concentrated similarly.

HUD Map 4 LEP below shows the highest populations of residents with limited English proficiency in the region are also concentrated in the Northeastern and Southeastern portions of Omaha; the West End, South End and Mid-City areas in Council Bluffs; and the most northern census tracts of Bellevue. As noted in the Demographics section above, the LEP population has been increasing since 1990 across the region and in these jurisdictions at a rate of an almost 100% increase from decade to decade since 1990.

Figure V-5 Regional LEP Population



Source: HUD Map 4 LEP (5 Most commonly used languages), Dot Density 1:25

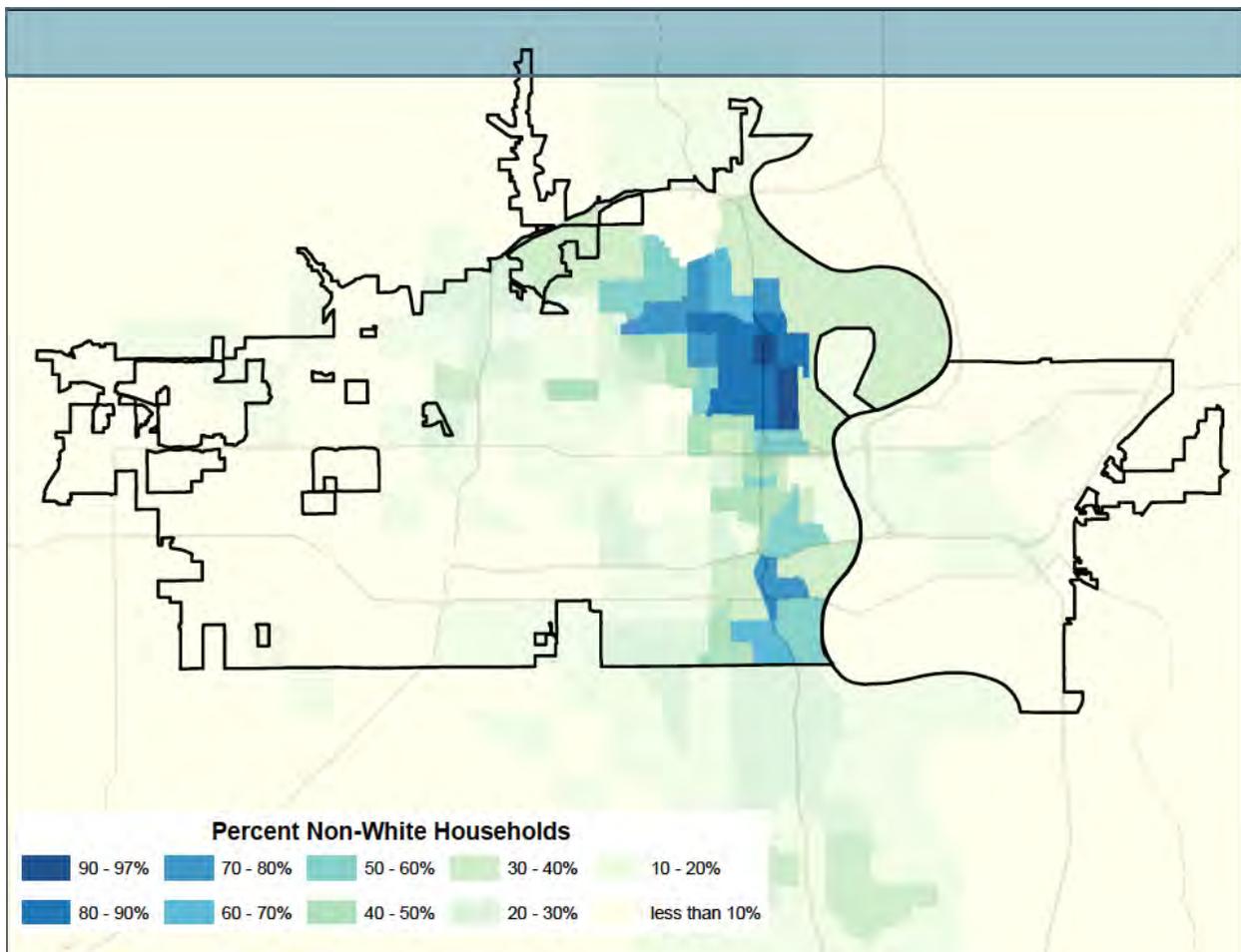
In Omaha, the majority of Spanish-speaking residents are located to the east of 72nd street in the north and along the southern border of the city to the east of 120th street. The largest population of Spanish-speakers and most concentrated areas of the LEP population are in census tracts in the most southeastern corner of the city, to the east of 42nd street and south of Dodge street. For over a century the southeastern portion of Omaha has been known to house new immigrants coming to the area. In the late 1800's and early 1900's, opportunities for employment through Union Pacific Railroad and the stockyards of Omaha drew large populations of foreign-born residents from Europe and eventually Latin America. Ethnic enclaves were reflected in social and religious institutions in the area at the turn of the 20th century and can still be seen in architecture, art, food, and music today.

The most southern R/ECAP has over 30% of persons in the LEP population. Of these, over 25% were identified as Spanish-speaking, and just over 3.5% as speaking African languages. This census tract also has one of the largest public housing complexes, additional scattered site housing, project-based section 8 housing, and low income housing tax credit projects which house many refugee and new immigrant families. Public housing and other forms of affordable housing to the north of Interstate 80 and

east of Interstate 480, may also contribute to the presence of LEP communities comprised of Spanish, Asian, and African languages in the southeast portion of the city.

In North Omaha census tracts have a more diverse population within the LEP communities. In addition to the presence of Spanish-speakers, there are more residents who speak African and “other” Asian languages in LEP communities living in R/ECAPs and other census tracts to the north of Dodge street. This trend is most likely capturing the large population of refugees who have come more recently to Omaha, and tend to reside in areas with more publicly supported and affordable housing options.

Figure V -6 Percentage of Non-White Households in Omaha and Council Bluffs



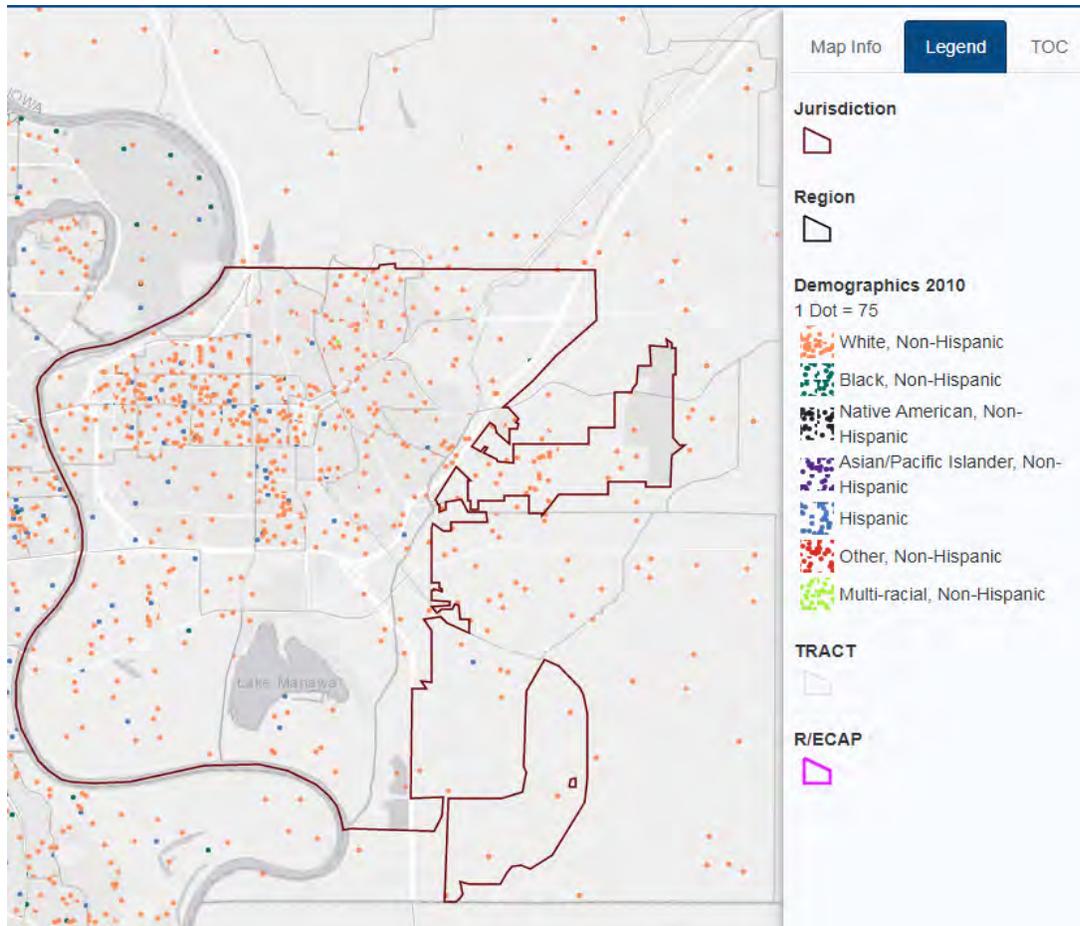
Source: 2014 ACS Census Data

In order to identify more definite boundaries of segregation, the map above was created, which displays the percentage of Non-White households by census tract. The census tracts showing 40%-50% and 50%-60% indicate the most integrated areas of the city. Overall, the most integrated areas of Omaha are in the Northwest, Midtown,

Downtown and some areas in the Southeast. Highly segregated areas included those to the far West, which are more than 90% White, and those in the Northeast and far Southeast Omaha which have 90% or more residents identifying as Non-White.

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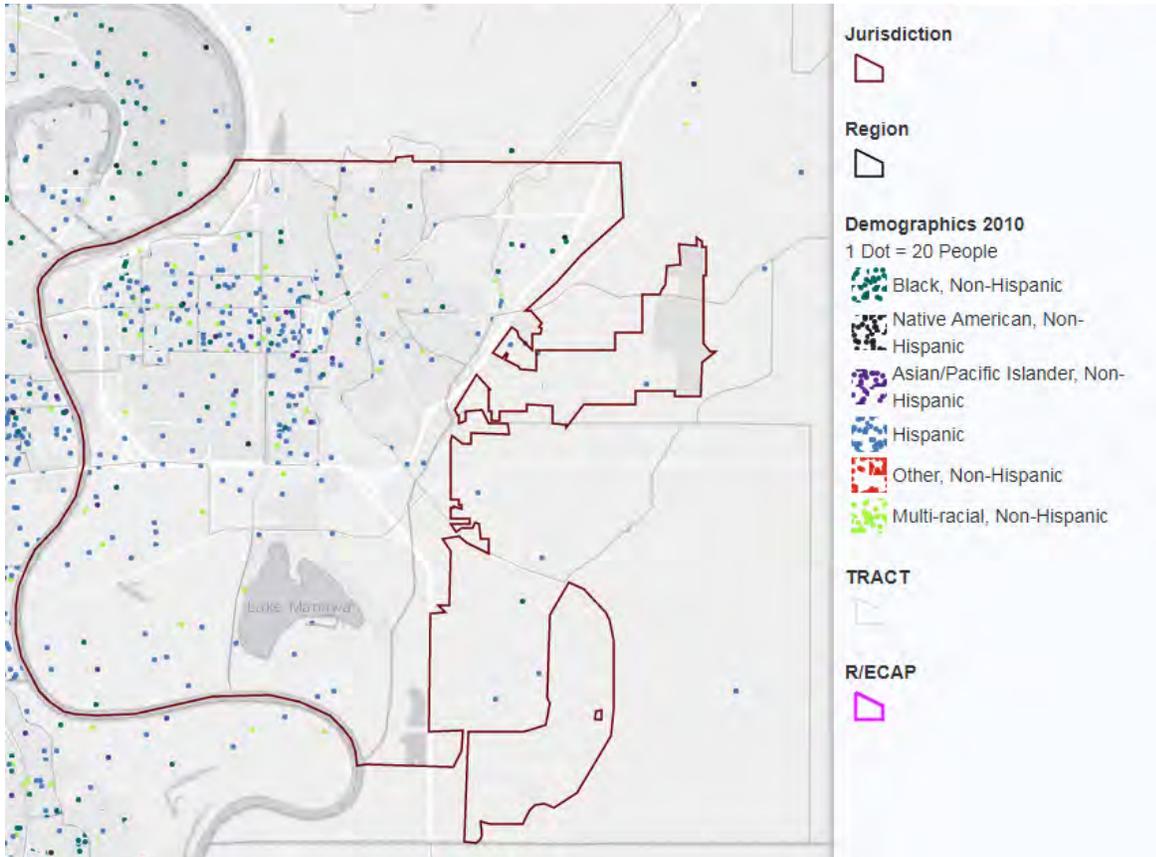
Figure V -7 Council Bluffs Demographics Race/Ethnicity



Source: HUD Map 1 Race//Ethnicity

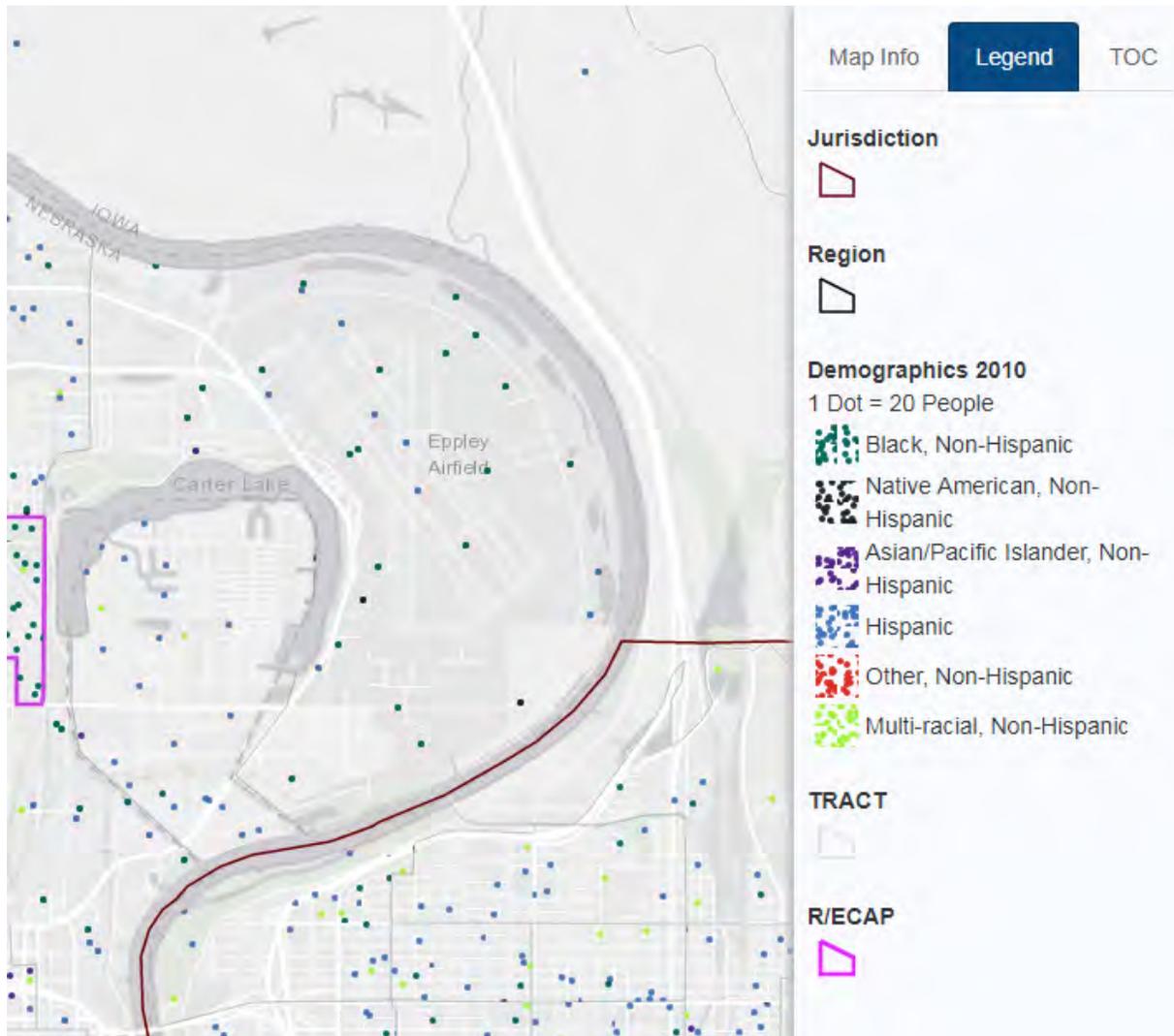
As the largest city in Southwest Iowa, Council Bluffs has significantly more diversity than the other 13 cities within Pottawattamie County. The 2010 Census found seven areas of concentration of minority residents. Census tracts 305.02, 306.02, 307, 308, 309, 313 and 314 are areas of concentration of Hispanic residents. There were no additional areas of concentration for any single minority group in 2010. These census tracts are located in the central and western portions (West-End, South-End and Mid-City neighborhoods) of the City and contain higher concentrations of residents living in poverty or who are low-to-moderate income.

Figure V-8 Council Bluffs Non-White Demographics



Source: HUD Map 1 Race/Ethnicity, Dot Density 1:20 White, Non-Hispanic Population Removed

Figure V-9 Carter Lake Non-White Demographics



Source: HUD Map 1 Race/Ethnicity, Dot Density 1:20 White, Non-Hispanic Population Removed

Carter Lake, Iowa is located on the west side of the Missouri River and is landlocked by the City of Omaha. The city of 3,785 has the highest racial and ethnic diversity by percentage in Pottawattamie County with only 90.3% identifying as White. The City's Hispanic population makes up 11.5% of the total population. Additionally, 5.8% of residents identify as two or more races and 1.0% identify as Black. The median home value in Carter Lake is \$98,000, which is significantly less than the City of Council Bluffs at \$111,900. Children in Carter Lake attend school within the Council Bluffs Public School District.

In Council Bluffs, The number one country of national origin outside of the United States in is Mexico with 2.57% of the population originating from the country. Other countries

of origin are El Salvador (0.46%), Vietnam (0.18%), Korea (0.12%), India (0.11%), Bosnia and Herzegovina (0.10%), Ukraine (0.10%), England (0.09%), Philippines (0.08%), and Turkey (0.07%).

For the region, Mexico is still the number one country of national origin outside of the United States with 3.06%. Other countries of origin include India (0.42%), El Salvador (0.28%), Vietnam (0.25%), Guatemala (0.21%), China excluding Hong Kong and Taiwan (0.18%), Korea (0.17%), Thailand (0.16%), Philippines (0.16%), and Burma (0.13%).

The number one limited English proficiency (LEP) language in Council Bluffs is Spanish with 2.99%. Other LEP languages spoken in the City include Other Slavic (0.11%), Vietnamese (0.08%), Serbo-Croatian (0.05%), Korean (0.03%), Portuguese (0.03%), Tagalog (0.03%), French (0.02%), and German (0.02%).

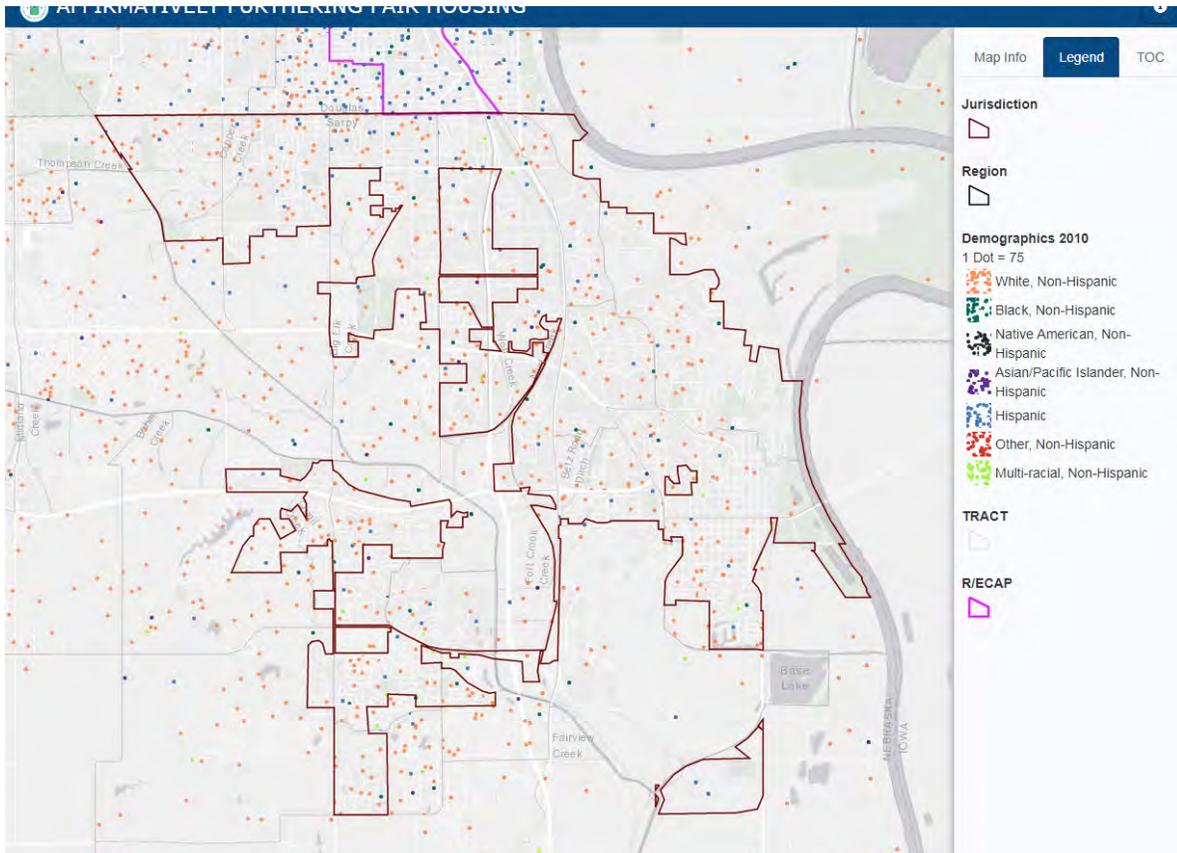
For the region, Spanish is the number one LEP language with 3.42%. Other LEP languages spoken in the region include Other Asian (0.24%), African (0.19%), Vietnamese (0.18%), Chinese (0.14%), French (0.13%), Other Indic (0.11%), Arabic (0.08%), Other Unspecified (0.05%), and Korean (0.04%).

The differences between Council Bluffs and the region are primarily due to size. The Omaha-Council Bluffs Metropolitan area includes several cultural pockets in Omaha that do not exist in Council Bluffs. For this reason, the diversity levels are less pronounced in the City whereas they may be more prevalent in the metro as a whole.

BELLEVUE

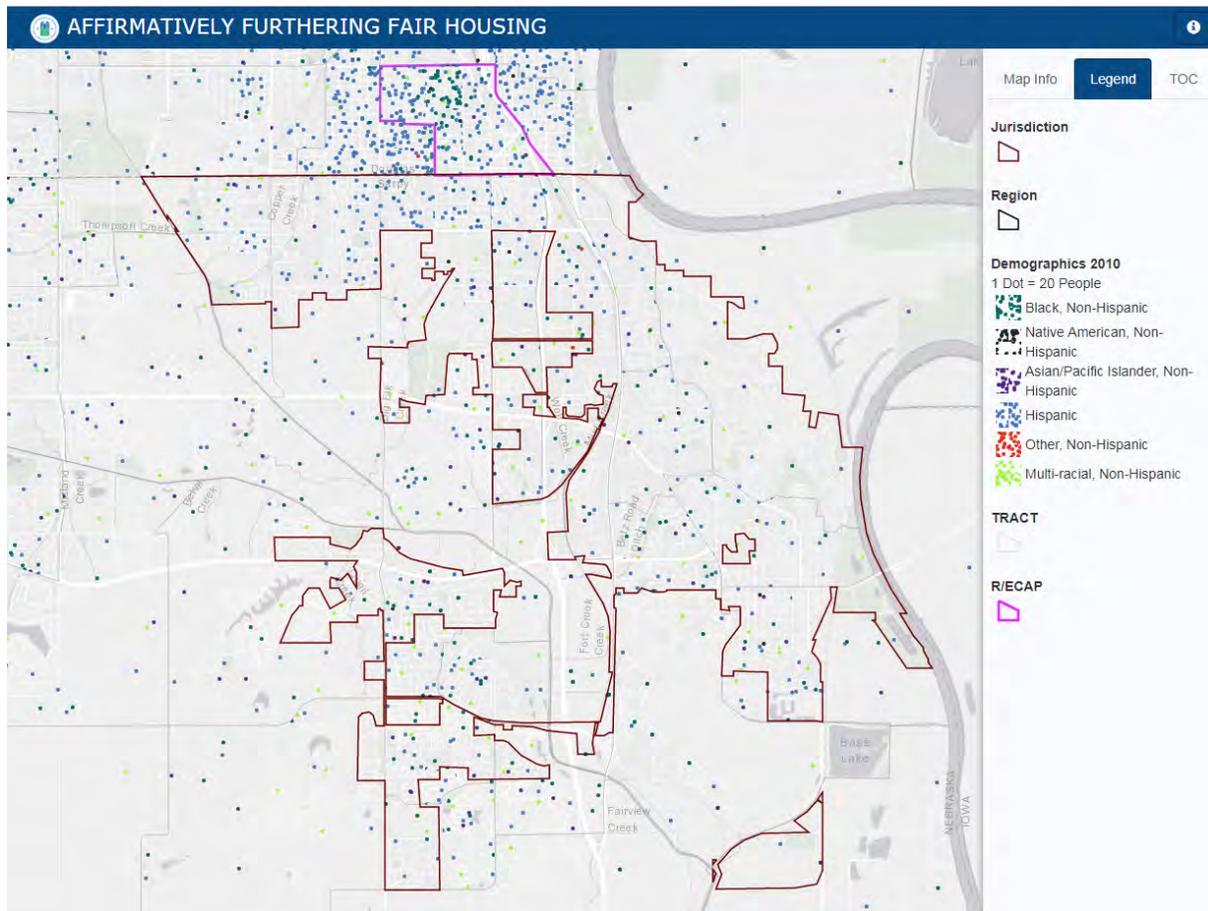
To identify areas with relatively high segregation and integration by race and ethnicity, the AFFH Maps 1, 3, and 4 were utilized to identify ethnicity and race, national origin, and LEP population in the Bellevue city limits and surrounding area.

Figure V -10 Bellevue Demographics



Source: HUD Map 1 Race/Ethnicity, Bellevue

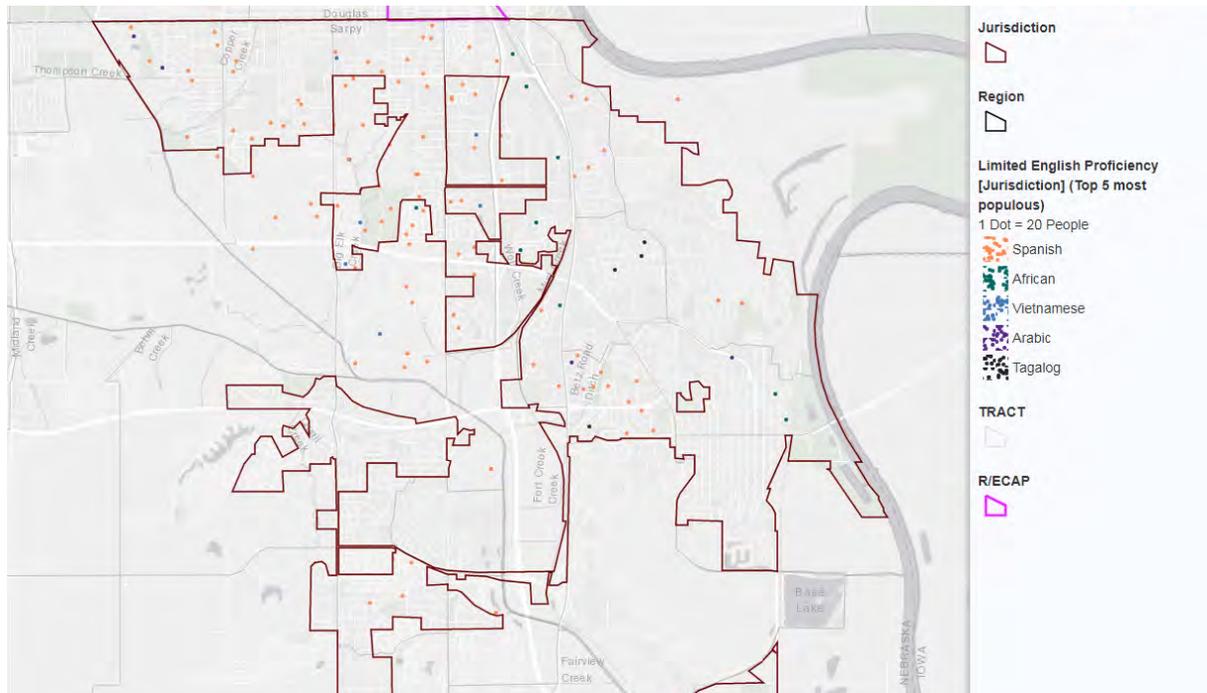
Figure V -11 Bellevue Demographics Race/Ethnicity



Source: HUD Map 1 Race/Ethnicity, Dot Density 1:20 White, Non-Hispanic Population Removed

HUD AFFH Map 1 demonstrates that Bellevue has diversity in most census tracts. The eastern area of Bellevue is the least integrated and also the oldest area, including districts such as Olde Towne Bellevue. More Hispanic residents live in the north central and north east areas of Bellevue than the other areas. The area north of Bellevue city limits has significantly higher concentration of Hispanic households than areas within Bellevue city limits. The Hispanic population in the northern area of Bellevue could be relocating to this specific location to remain close to support systems, family and networks which are notably located in the south area of Omaha (as indicated by Figure V-11). The area just north of Harrison Street is also an industrial job center with many employment opportunities. Harrison Street is a dividing line between Douglas County and Sarpy County which not only separates jurisdictions, but also a number of social services.

Figure V -12 LEP Population Bellevue

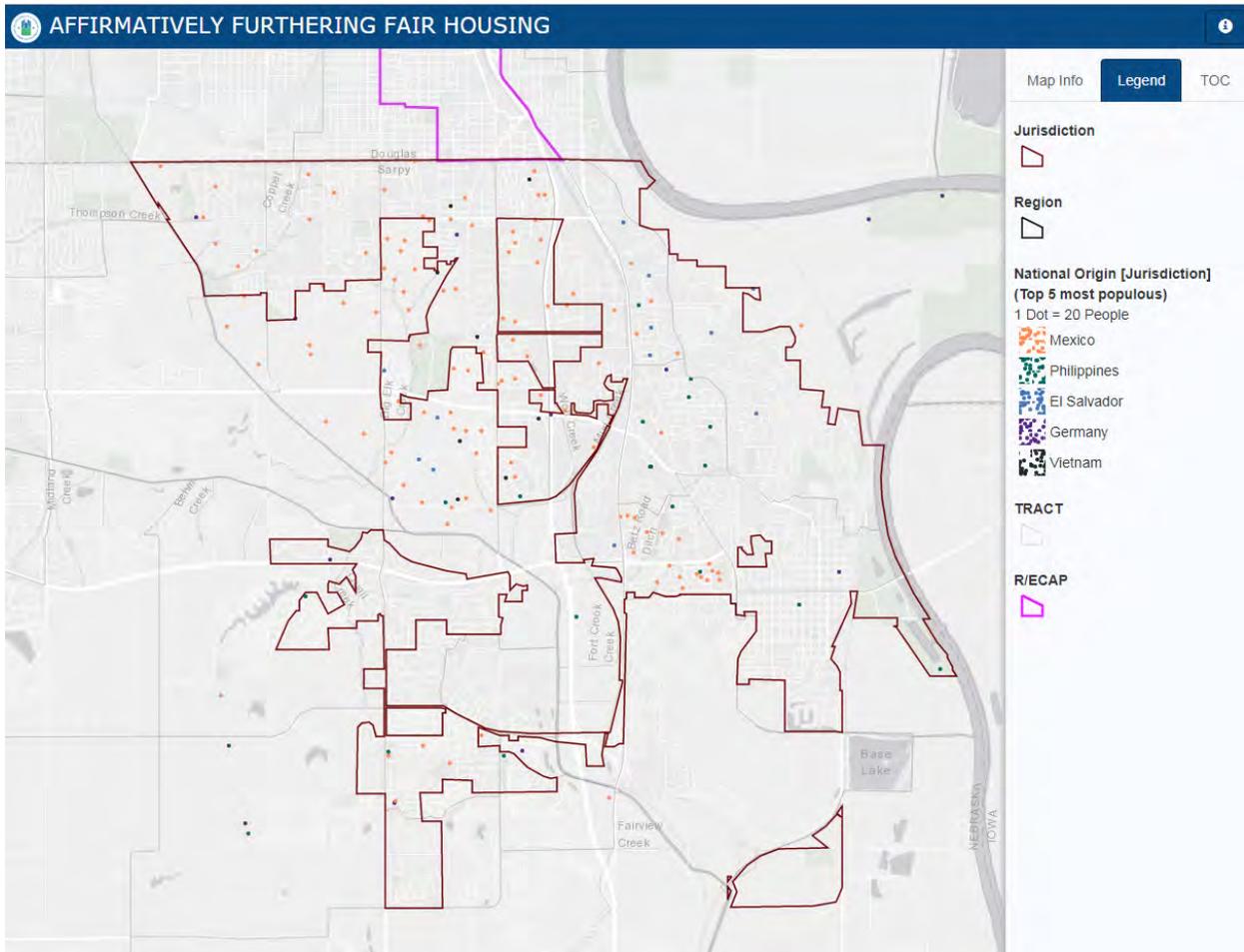


Source: HUD Map 4 LEP, Dot Density 1:20

The percentage of the population in Bellevue that is designated as having Limited English Proficiency (LEP) is 4.77% which is an increase from 2000 when it was 2.77%, but only a slight decrease from 2010 when it was 4.92%. Most LEP households in Bellevue are Spanish-speakers at 4%, followed by residents who speak African languages at a significantly lower percentage of .36%. HUD AFFH Map 4 shows a slight concentration of LEP households is in Central, North Central and Northwest Bellevue. As with racial and ethnic groups, the majority of Spanish-speaking LEP households are located in north central and central Bellevue.

This can also be seen when reviewing national origin presented in HUD AFFH Map 3. Those with national origins of Mexico and El Salvador can be found mostly in in north central and central Bellevue.

Figure V -13 Bellevue National Origin



Source: HUD Map 3 National Origin; Dot Density 1:20

c. Explain how these segregation levels and patterns in the jurisdiction and region have changed over time (since 1990).

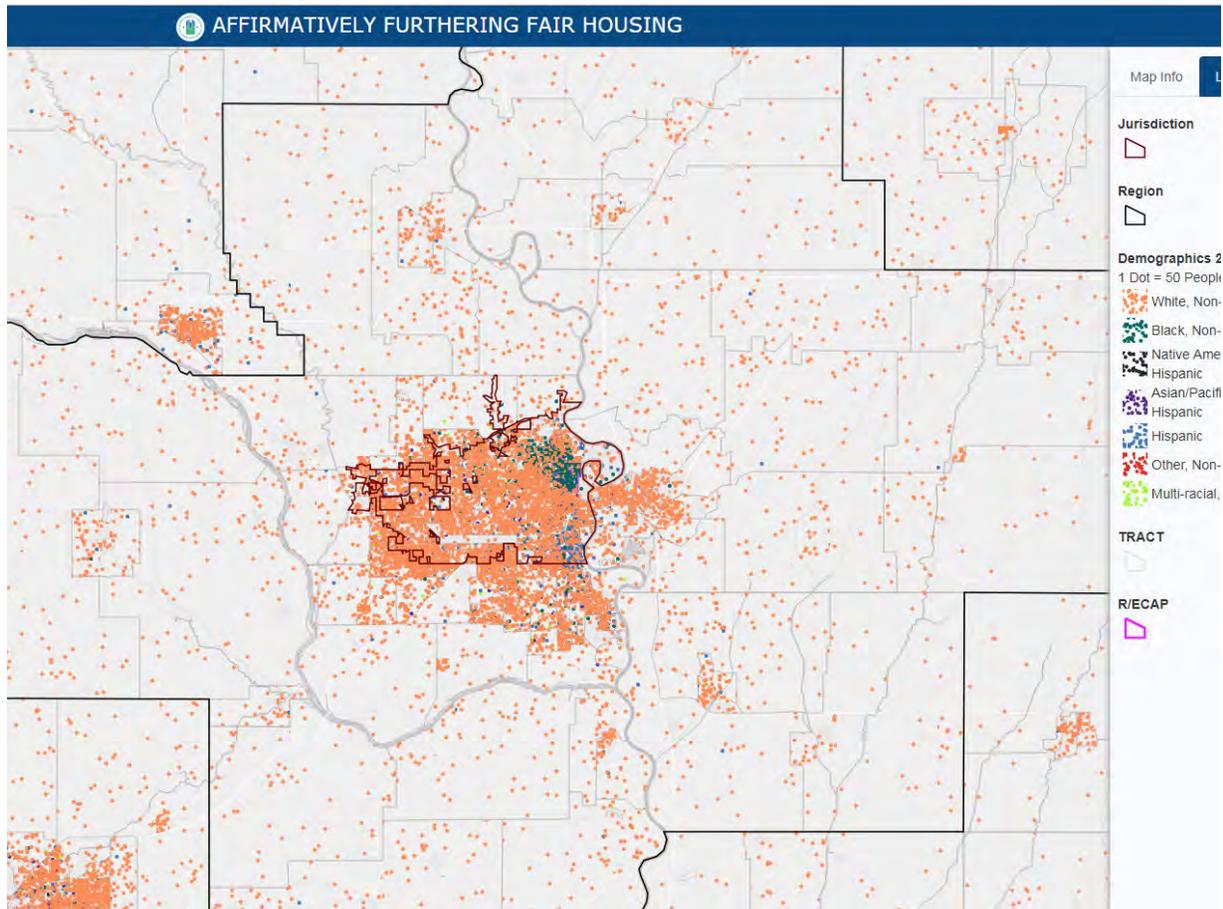
Figure V-7 Regional Demographic Trends

Racial/Ethnicity	NE-IA Region		
	1990	2000	2010
White	608,068	642,805	681,172
Black	50,830	63,236	75,916
Hispanic	16,664	40,207	77,508
Asian or pacific Islander	6,138	13,605	22,557
Native American	2,978	5,629	6,730

Source: HUD Table 2 Demographic Trends

As mentioned in the Demographic Summary in Section A, changes in population according to Census Data from 1990 to 2010 show that the Omaha-Council Bluffs Region is experience growth. Hispanic households are the fastest growing population in the region.

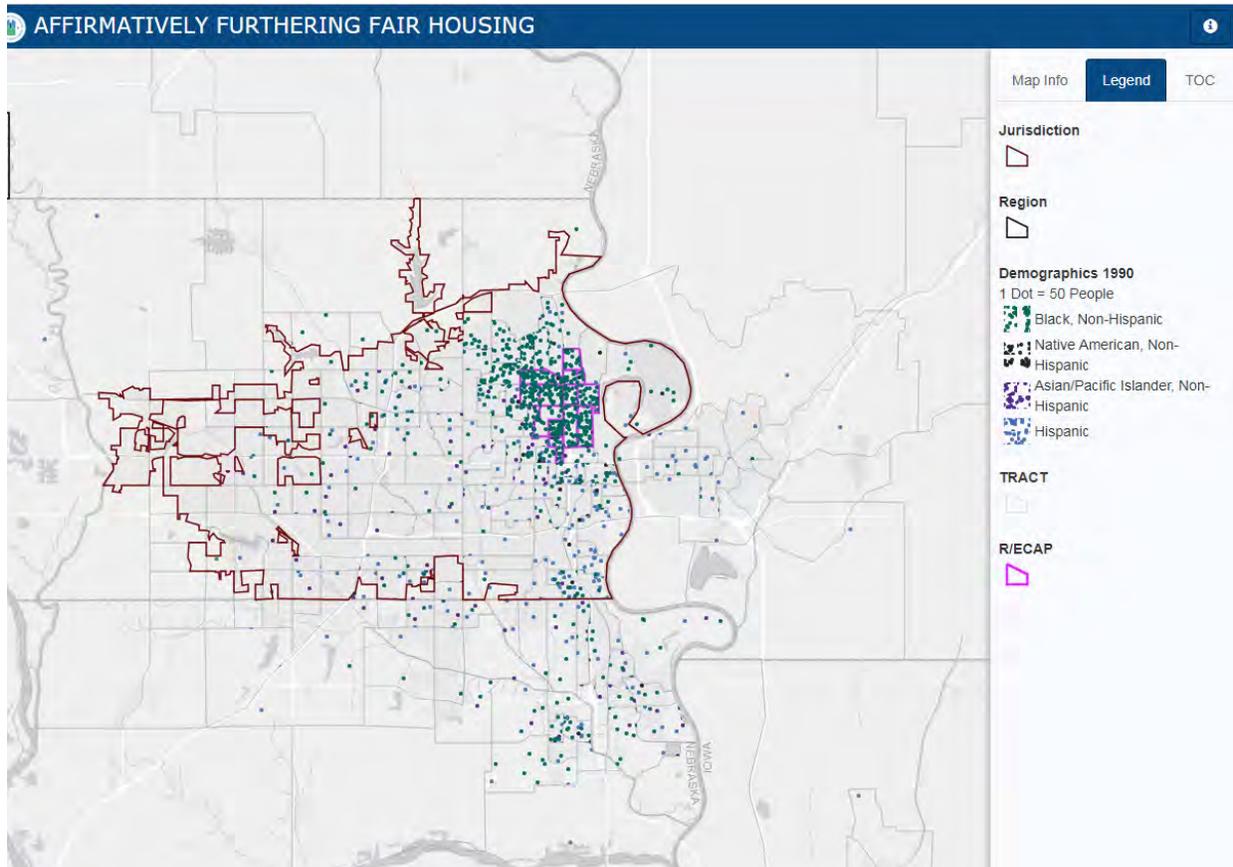
Figure V -14 Current Regional Demographics



Source: HUD Map 1 Race/Ethnicity, Dot Density 1:50

The HUD maps below indicates that the majority of minority residents from the region are living in Omaha, Council Bluffs, and Bellevue, but disproportionately in Omaha. Many Black households and Latino households are located within R/ECAPS. In 1990 all twelve R/ECAPs are located in North Omaha.

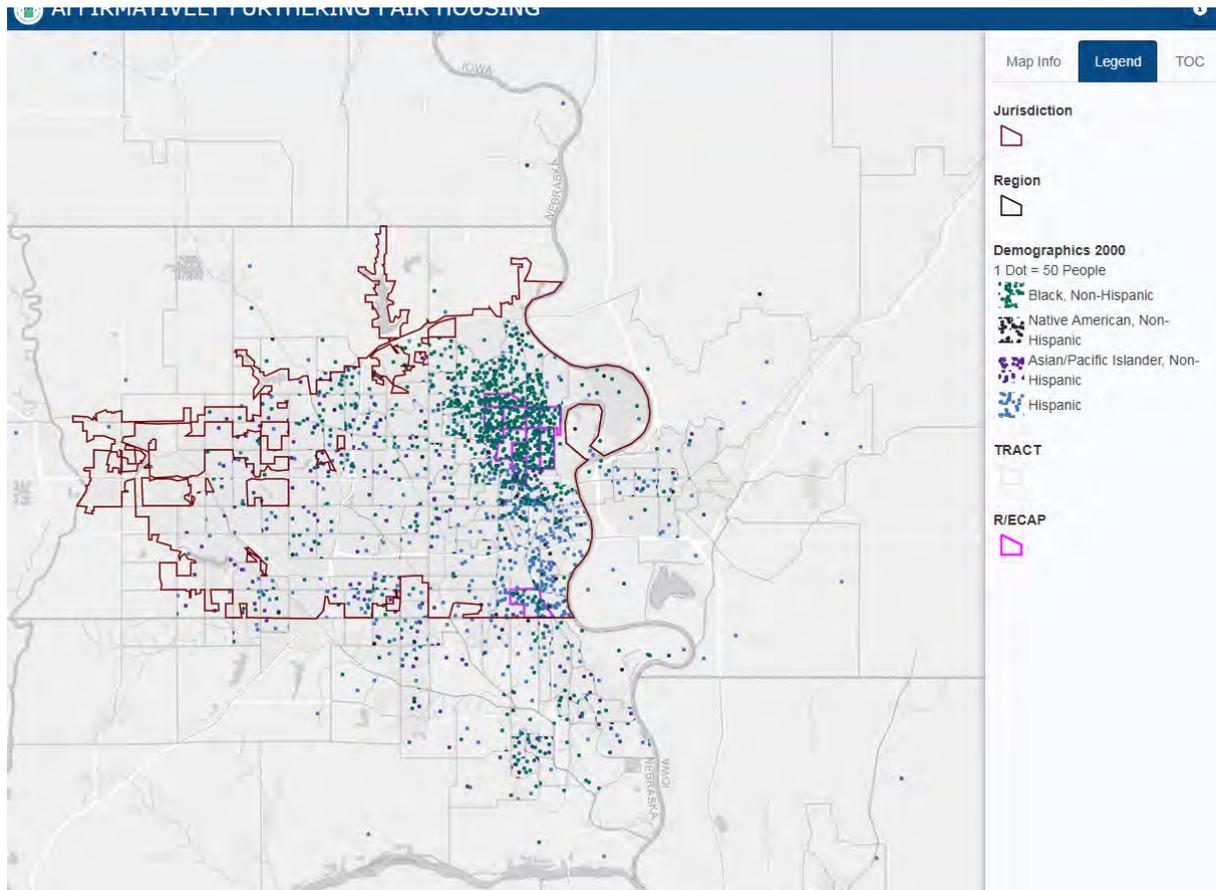
Figure V -15 Regional Demographics 1990



Source: HUD Map 2 Race/Ethnicity Trends, Dot Density 1:50, White, Non-Hispanic Population Removed

The variety of HUD maps regarding Race/Ethnicity Trends provides a visual display of census data of demographics for the region in 1990, 2010, and 2010. The data indicates that the concentration of minority residents in North Omaha in 1990 between 2010 increased and also became more diverse. Census tracts that were primarily Black in 1990 saw an increase in Hispanic and Asian/Pacific Islander households by 2010. Additionally there is a trend of Black residents occupying a larger area into Northwest Omaha and the Midtown areas.

Figure V -16 Regional Demographics 2000



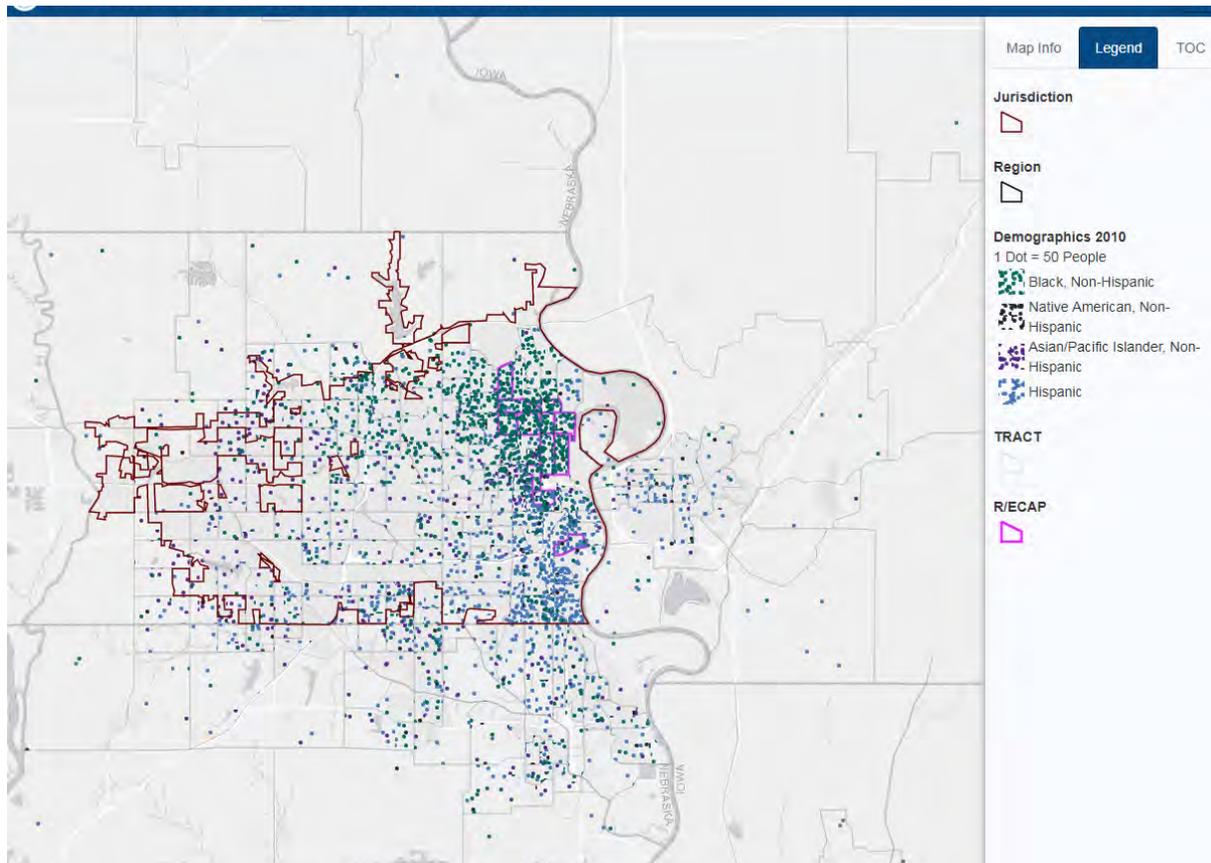
Source: HUD Map 2 Race/Ethnicity Trends, Dot Density 1:50, White, Non-Hispanic Population Removed

HUD Map 2 displays the change in regional demographics in 2010. An increase overall in the total amount of Non-White residents can be seen in Omaha, Council Bluffs, and Bellevue. A majority of this increase can be seen in Southeast Omaha.

OMAHA

Within the Omaha jurisdiction, Black households have moved north and west, while Hispanic households have increased in the south. In 2010, there were eleven R/ECAPs, including 10 in North Omaha and one in South Omaha. Simultaneously, White residents moved further west and southwest. The City of Omaha's westward expansion and development in the western portions of Sarpy County added to this trend.

Figure V -17 Regional Demographics 2010



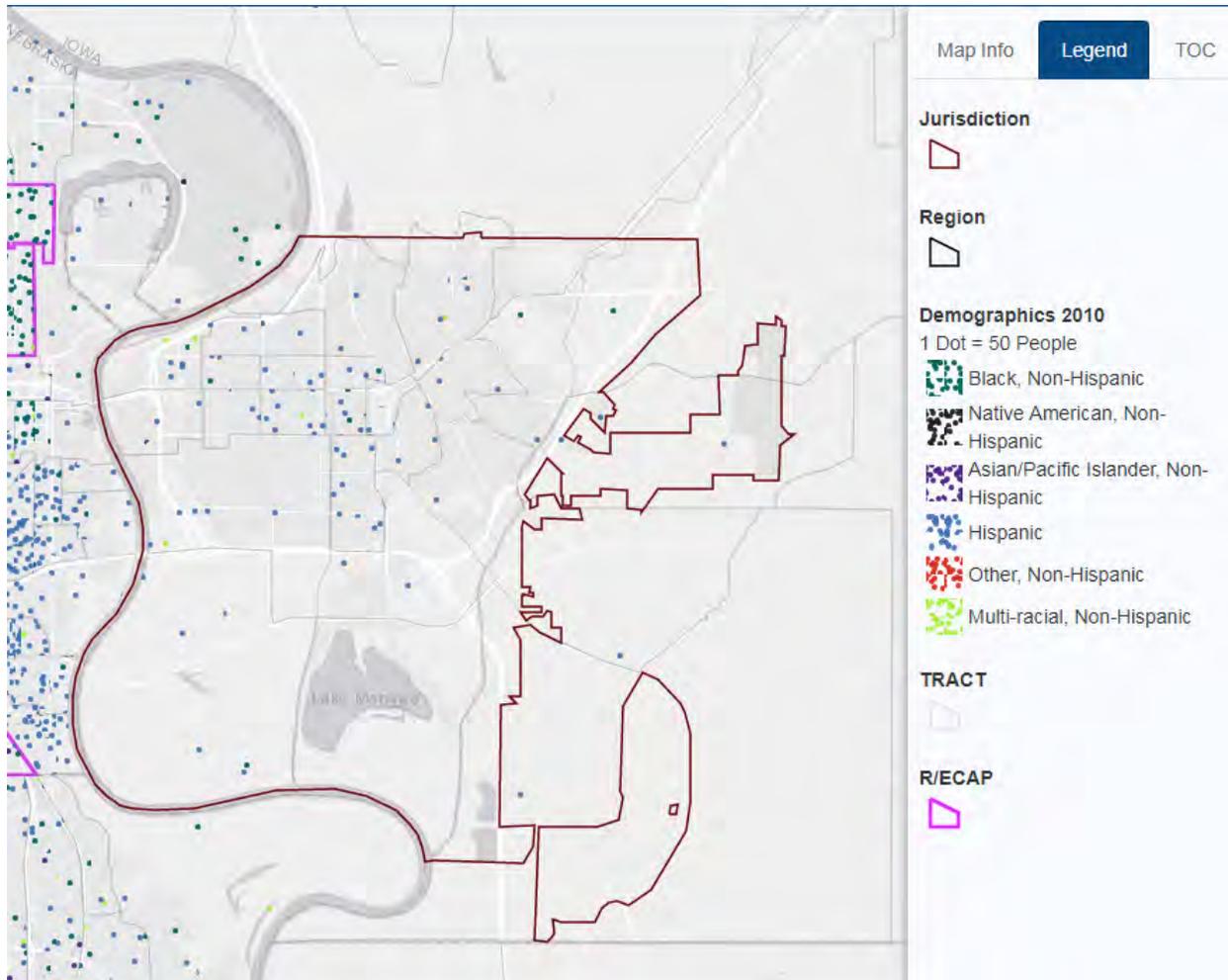
Source: HUD Map 2 Race/Ethnicity Trends, Dot Density 1:50, White, Non-Hispanic Population Removed

The visible increase in the number of Hispanic residents and movement of the Black population further north and west continued in 2010. The number of R/ECAPs increased to 12, although the census tracts with this designation shifted. The density of White residents in the west and south also continued. Omaha's annexation of Elkhorn in 2007 may be a factor in the development of even more neighborhoods and businesses in the far western portion of Omaha.

Omaha's population quadrupled between 1990 and 2010. The increase in population was prominent in South Omaha and Southwestern areas of Omaha. Asian Pacific/Islanders made up less than 1% of Omaha's population in 1990 and were distributed throughout the city but with slightly higher concentrations in North Omaha. This population tripled by 2010 with the majority of Asian/Pacific Islander households located in Midtown, census tracts along the southern border of the city along Harrison Street, and in the west along 168th street.

COUNCIL BLUFFS

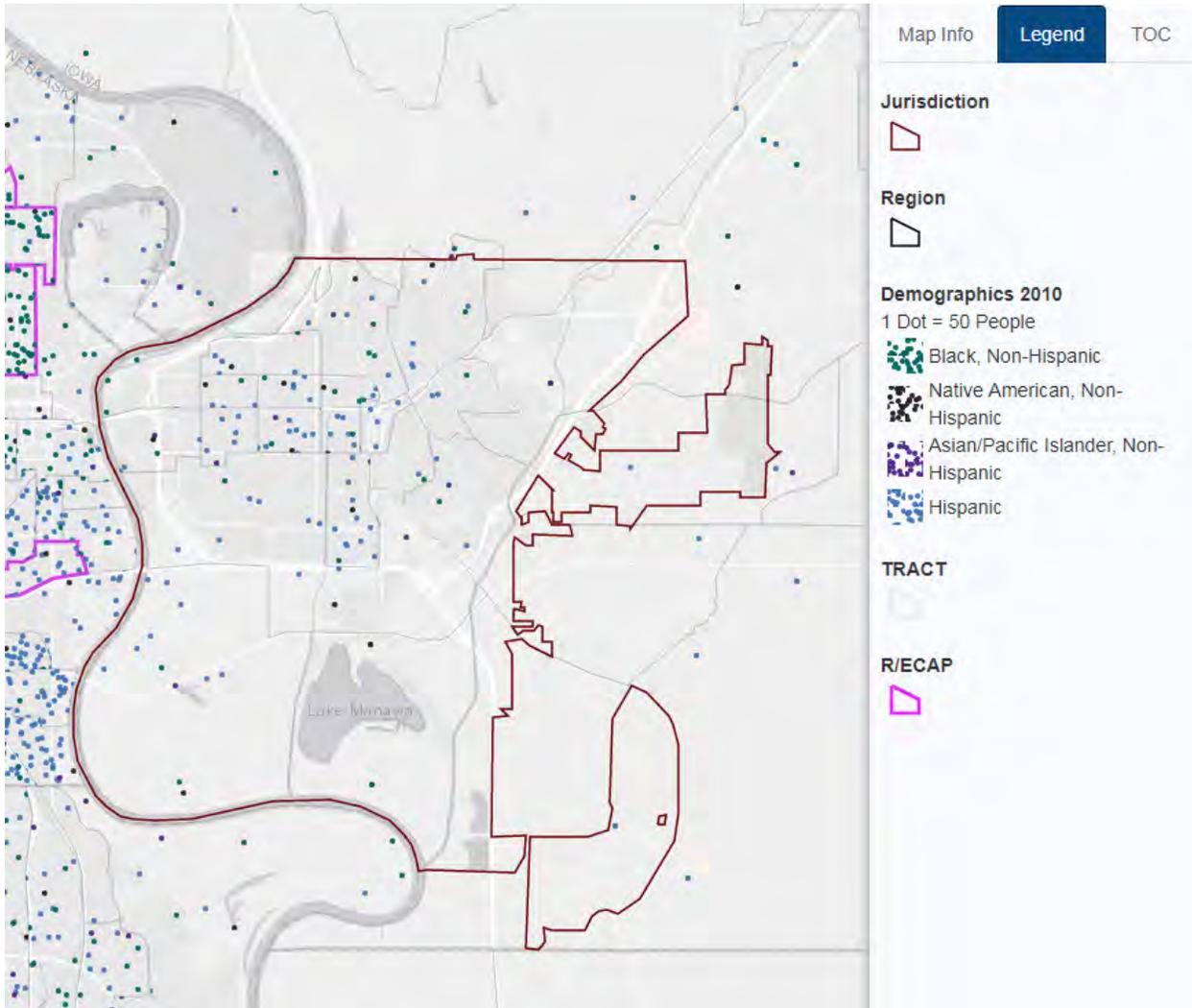
Figure V -18 Council Bluffs Demographic Trends 1990



Source: HUD Map 2 Race/Ethnicity Trends, Dot Density 1:50, White, Non-Hispanic Population Removed

Since 1990, the City has shown steady percentages for all ethnicities with the exception of those identifying as Hispanic. In 1990, 1,313 residents (2.4%) identified as Hispanic/Latino. In 2000, 2,594 (4.5%) of the population identified as Hispanic/Latino population. This trend shows each decade, the City doubles its previous decade's Hispanic/Latino population. Though this is still a small percentage of the total population, it is something the City will need to plan for in the future. There are minor clusters of Hispanic households located in the West End and South Ends of the City including US Census Tracts 305.02, 306.02, 307, 308, 309, 313 and 314. The change overtime is the increase in the number of Hispanic households though no specific trends in segregation exist.

Figure V -19 Council Bluffs Demographic Trends 2010



Source: HUD Map 2 Race/Ethnicity Trends, Dot Density 1:50, White, Non-Hispanic Population Removed

BELLEVUE

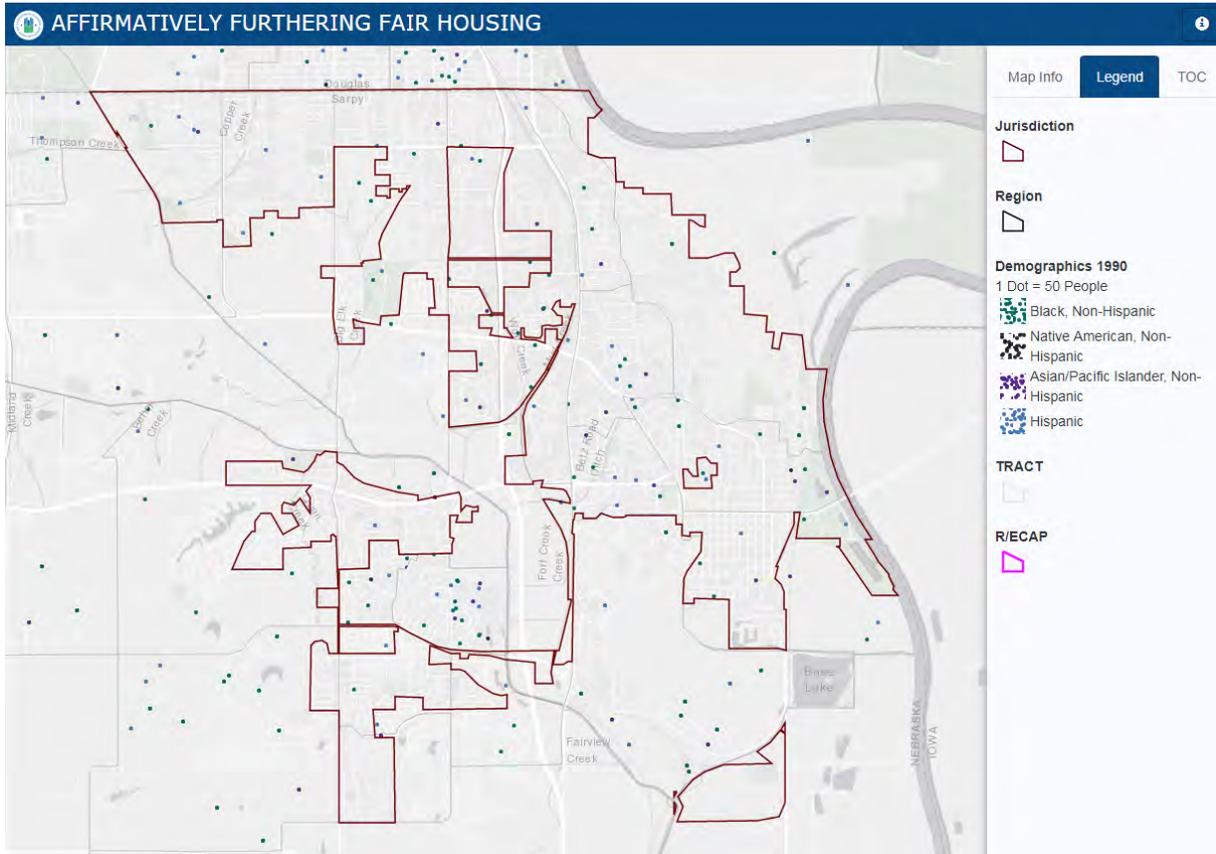
Table V-8 Dissimilarity Trends Bellevue

Table 3 - Racial/Ethnic Dissimilarity Trends				
	(Bellevue, NE CDBG) Jurisdiction			
Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	15.94	15.33	13.94	20.05
Black/White	21.37	22.14	20.27	26.37
Hispanic/White	11.55	18.61	24.35	28.32
Asian or Pacific Islander/White	25.05	19.61	14.19	24.87
Note 1: Data Sources: Decennial Census				

Source: HUD Table 3 Racial/Ethnic Dissimilarity Trends

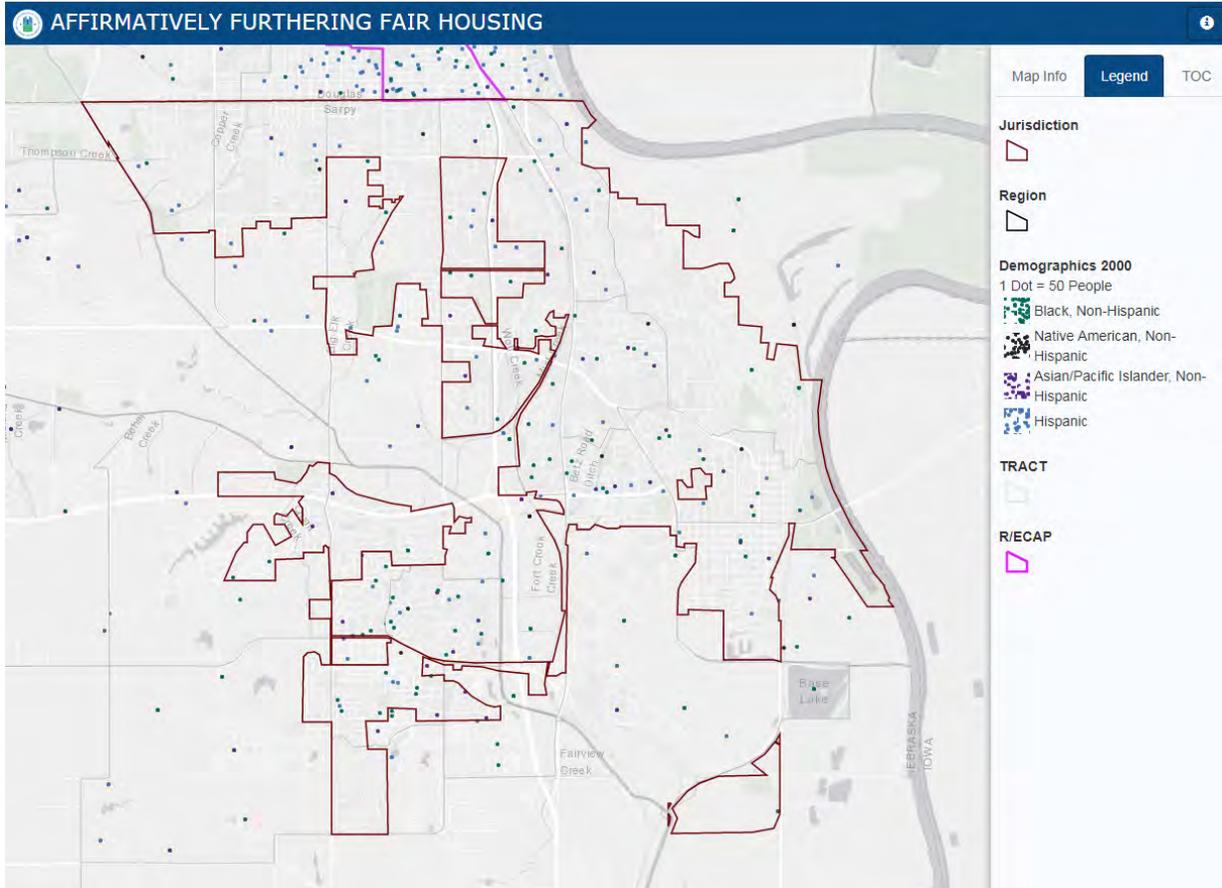
Over time, the segregation level in Bellevue has fluctuated, but not significantly. As shown above in the HUD AFFH Table 3, Bellevue’s segregation for all races has remained in the low category which is likely a result of non-white populations being dispersed evenly throughout the jurisdiction. HUD Map 2 shows data for years 1990, 2000 and 2010. These maps indicate that the race and ethnicity of Bellevue has been similar over a 20 year period. This reiterates the information provided by Table 3.

Figure V -20 Bellevue Demographics 1990



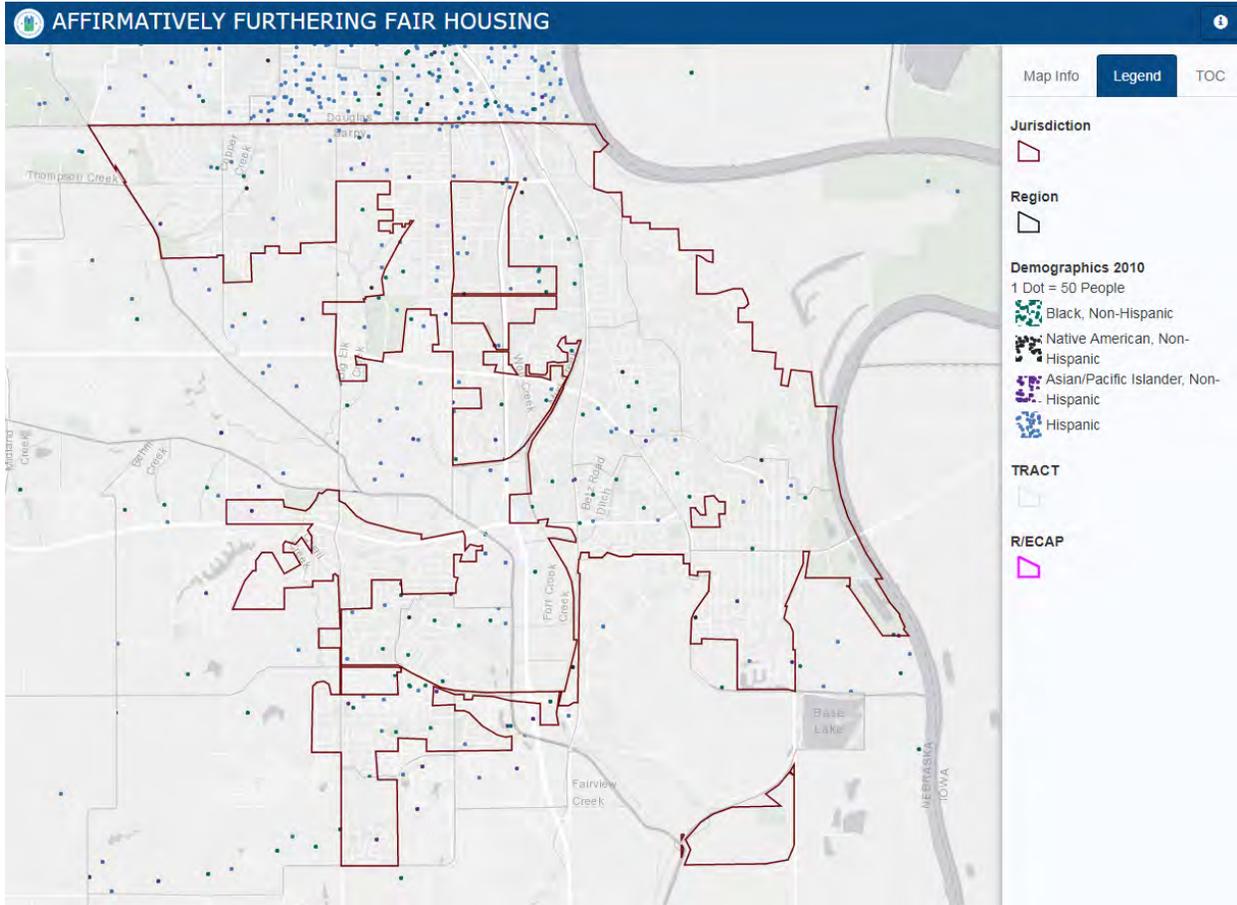
Source: HUD Map 2 Race/Ethnicity Trends, Dot Density 1:50, White, Non-Hispanic Population Removed

Figure V -21 Bellevue Demographics 2000



Source: HUD Map 2 Race/Ethnicity Trends, Dot Density 1:50, White, Non-Hispanic Population Removed

Figure V -22 Bellevue Demographics 2010



Source: HUD Map 2 Race/Ethnicity Trends, Dot Density 1:50, White, Non-Hispanic Population Removed

d. Consider and describe the location of owner and renter occupied housing in the jurisdiction and region in determining whether such housing is located in segregated or integrated areas, and describe trends over time.

Table V-9 Rental and Home Ownership Rates

	Percentage of households Region		Percentage of households Omaha		Percentage of households Council Bluffs		Percentage of households Bellevue	
	Own	Rent	Own	Rent	Own	Rent	Own	Rent
Total % Household Units	73%	27%	59%	41%	64%	36%	68%	32%
Total # Household Units	224,970	112,190	97,745	67,375	15,675	8,845	13,295	6,350

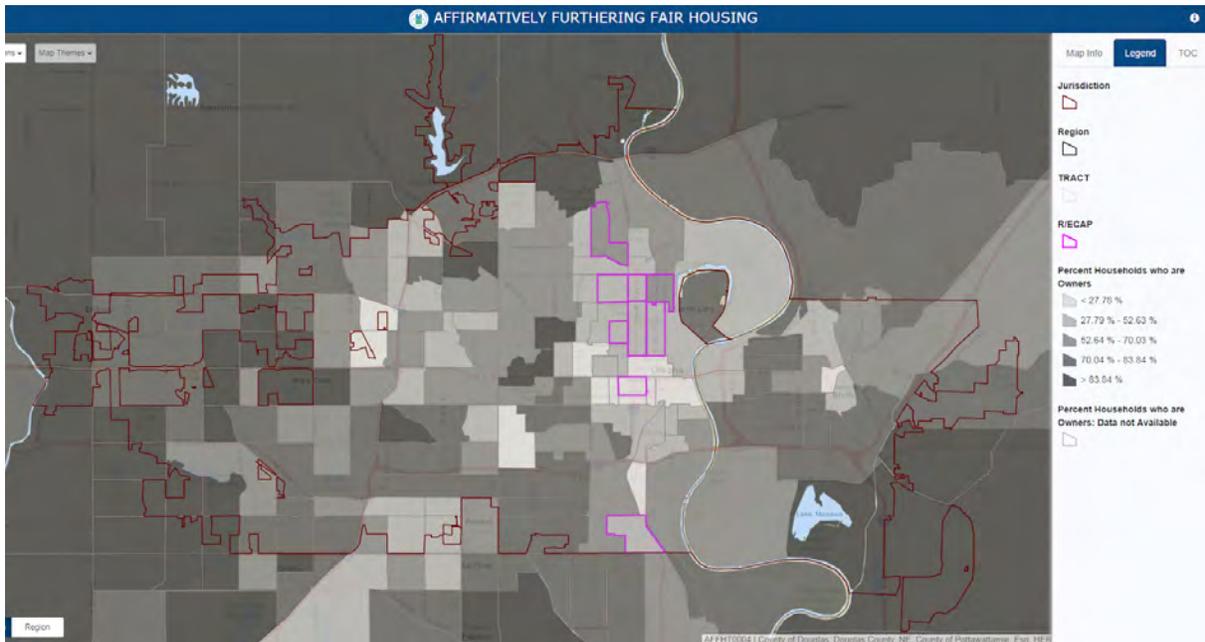
Source: HUD Table 16 Homeownership and Rental Rates

According to HUD Table 16 Homeownership and Rental Rates, there are just over 335,000 households in the region, and the number of households owning their home is over double the number of those who rent. According to 1990 Census Data collected through Social Explorer, the region has experienced a gain in the total number of households over the last two decades and an overall increase in home ownership. In 1990, there were a total of 257,279 households in the eight county region, with 34% of the households renting and 64% of households recorded as owning their homes. Data above from HUD’s Comprehensive Housing Affordability Strategy (CHAS) data provided in HUD Table 16 shows the total number of households for the Region as 337,160, with 27% of households renting and the 73% of the region’s households owning their home.

All jurisdictions have a lower homeownership rate than the region, but Omaha has the lowest among the three cities. In both Council Bluffs and Bellevue, home ownership is double the amount of those households renting, matching the regional trend. Home ownership for White, Non-Hispanic households is much higher in all jurisdictions than any other category of race/ethnicity.

OMAHA

Figure V -26 Home Ownership Omaha-Council Bluffs

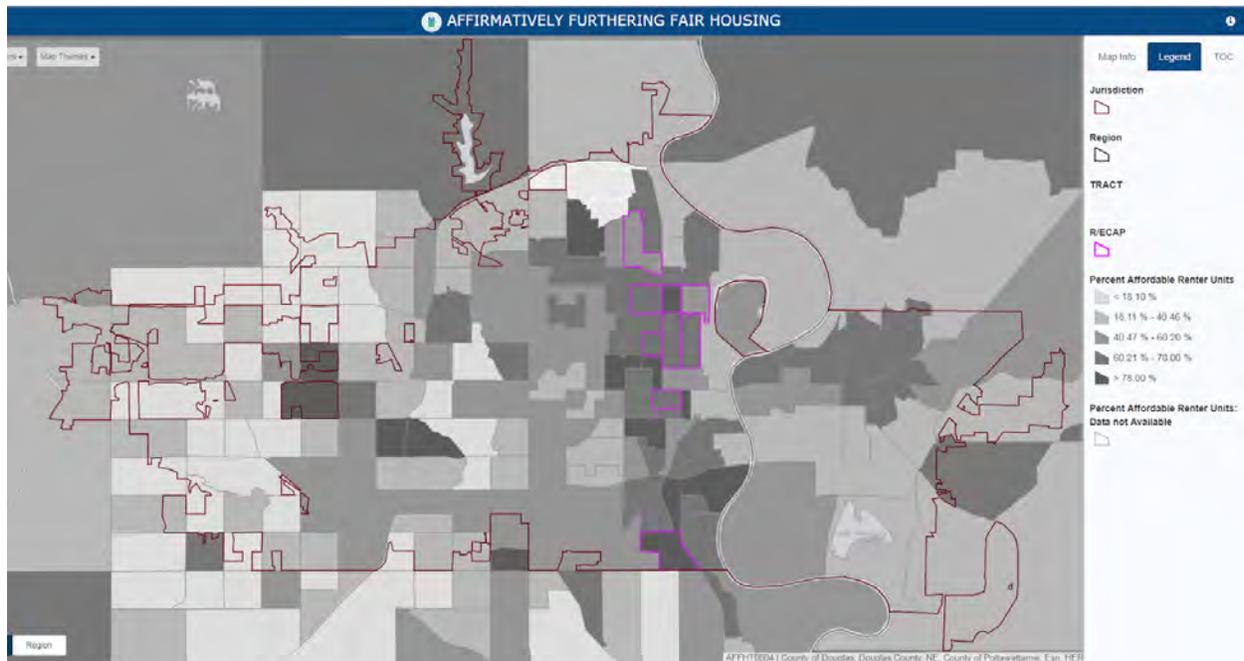


Source: HUD Map 16 Housing Tenure; Percent Households Who Are Owners

In Omaha, home ownership is higher to the west of 42nd street. More than half of the census tracts to the east of 42nd are composed of rental properties, with a majority of the census tracts having less than 20% ownership rates. The highest rate of homeownership in the city is concentrated west of 120th street where all census tract rates are all 60% or higher and the majority over 70%.

In addition to having the highest amount of rental properties, the neighborhoods east of 42nd Street also have the highest percentage of affordable rental units. According to HUD Map 17 which shows the location of rental units affordable to 50% of the average median income, affordable units are concentrated in northeast and southeast Omaha.

Figure V -27 Omaha/Council Bluffs Affordable Rental Housing



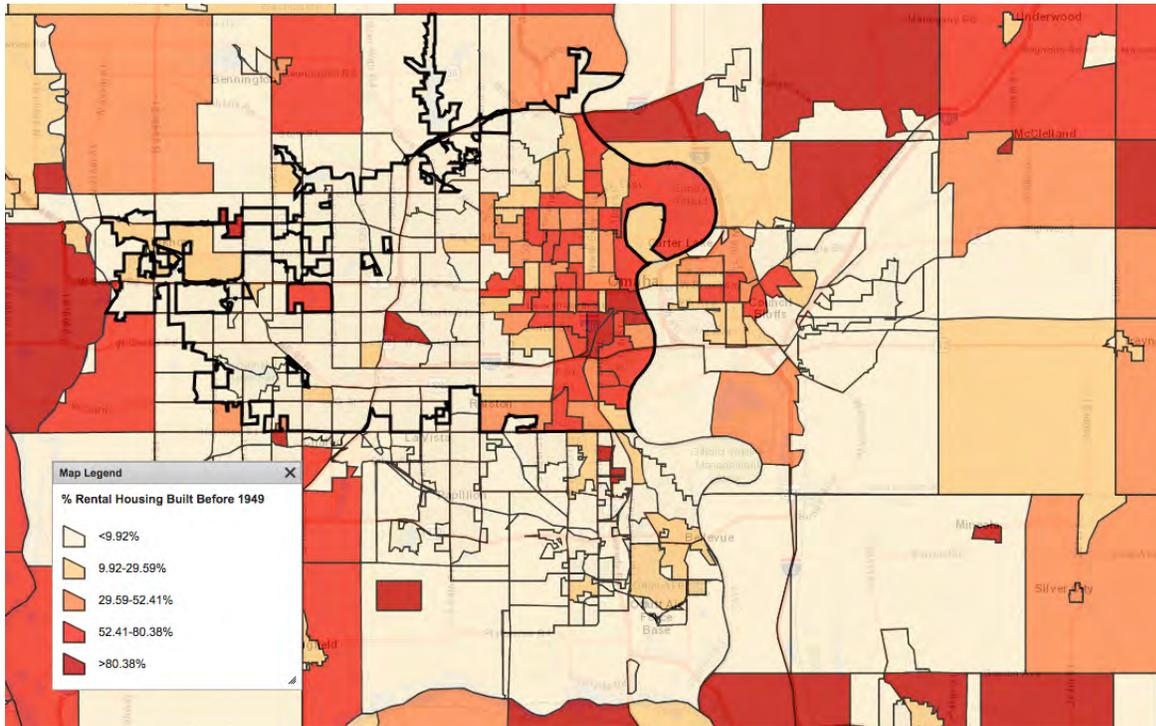
Source: HUD AFFH Map 17 Location of Affordable Rental Housing, Omaha Council Bluffs Consortium

Areas to the east of 42nd also house the largest percentage of Non-White residents in the Omaha area. The concentration of protected classes paired with low rates of homeownership and the high percentage of affordable rental units, all located east of 42nd Street, indicates that there are factors contributing to the segregation in the jurisdiction. Based on local data and community input these factors include:

- Lack of affordable housing for families at 50% average median income (AMI) or lower (see “Access to Low Poverty Neighborhoods)
- Lack of incentives for developers to produce affordable housing
- Barriers to infill development (high construction/rehab costs and current stormwater regulations)
- Community opposition to low-income and mixed income development

This inequity includes the quality of housing available for residents living in the area. According to HUD Community Planning and Development (CPD) maps below, the rental housing east of 42nd Street is also older the rental housing stock in other areas of Omaha. A majority of the census tracts in northeastern and southeastern Omaha have 50% or more of the rental housing units built prior to 1949.

Figure V-28 Percentage of Rental Housing Built Before 1949



Source: HUD Community Planning and Development (CPD) Maps for Omaha Council Bluffs Region

As the City of Omaha has grown west, newer units were constructed. Census tracts in the far western portion of the city have the highest rates of home ownership, lowest rates of rental housing, lowest density of affordable units, and least amount of publicly supported housing. Western Omaha neighborhoods are also the most homogenous, with the largest percentage of white residents per census tract.

When comparing homeownership and rental rates based on race/ethnicity, there are significant differences between White and non-White households. The table below compares homeownership and rental rates from 2010 Census data based on race and ethnicity.

Table V-10 Regional and Jurisdictional Homeownership and Rental Rates

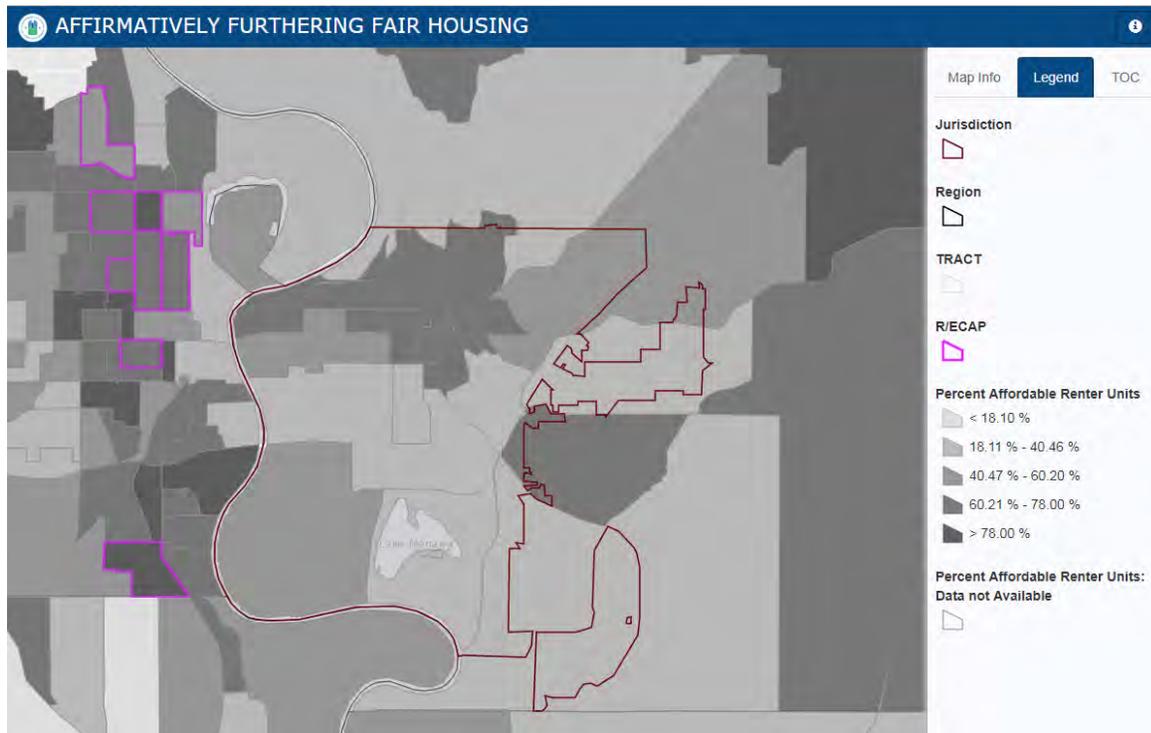
Race/Ethnicity	Percentage of households Region		Percentage of households Omaha		Percentage of households Council Bluffs		Percentage of households Bellevue	
	Own	Rent	Own	Rent	Own	Rent	Own	Rent
White, Non-Hispanic	89.13 %	71.05%	83.99%	62.02%	93.59%	86.8%	83.64%	73.54%
Black, Non-Hispanic	4.14%	14.54%	7.27%	20.71%	0.51%	2.26%	5.04%	10.00%
Hispanic	4.26%	9.00%	6.19%	10.51%	4.59%	8.08%	8.39%	11.34%
Asian or Pacific Islander	1.25%	2.71%	1.18%	3.60%	0.34%	0.73%	1.09%	2.44%
Native American	0.21%	0.54%	0.27%	0.66%	0.13%	0.23%	0.08%	1.10%
Other, Non-Hispanic	0.99%	2.17%	1.11%	2.49%	0.83%	2.37%	1.81%	1.57%
Total % Household Units	73%	27%	59%	41%	64%	36%	68%	32%
Total # Household Units	224,970	112,190	97,745	67,375	15,675	8,845	13,295	6,350

Source: HUD Table 16: Homeownership and Rental Rates by Race/Ethnicity

Across the region and in each jurisdiction, White households are the only demographic with a higher percentage of homeowners than renters. All other races and/or ethnic groups have at least double the amount of households renting rather than owning their homes.

COUNCIL BLUFFS

Figure V -29 Council Bluffs Percentage of Affordable Rental Units by Census Tract



Source: HUD Map 17 Location of Affordable Rental Units (% rental units affordable to 50% AMI)

According to Map 17, the most affordable areas in Council Bluffs are the West End and the Mid-City areas. The percent of affordable rental units in these areas range from 64.56% to 78%.

Single-family rental units are typically located throughout the Council Bluffs jurisdiction with concentrations in Mid-City, the west end, south end and Manawa areas. The number of affordable rental units in the east end is significantly less than other areas of the city.

Owner-occupied units are available throughout the city with the highest ratios of owner-occupied units in the east end of the City. These neighborhoods include older established areas as well as new construction, and high-end subdivisions.

Multi-family apartment complexes are also spread throughout the city with one concentration in the west end, specifically Census Tracts 303 and 304.

In past years, multi-family development tended to be concentrated in areas of lower income; however, this has changed in recent years. In the last 15 years, the City's

Community Development Department has worked to diversify available affordable multi-family housing to other portions of the city including the following developments:

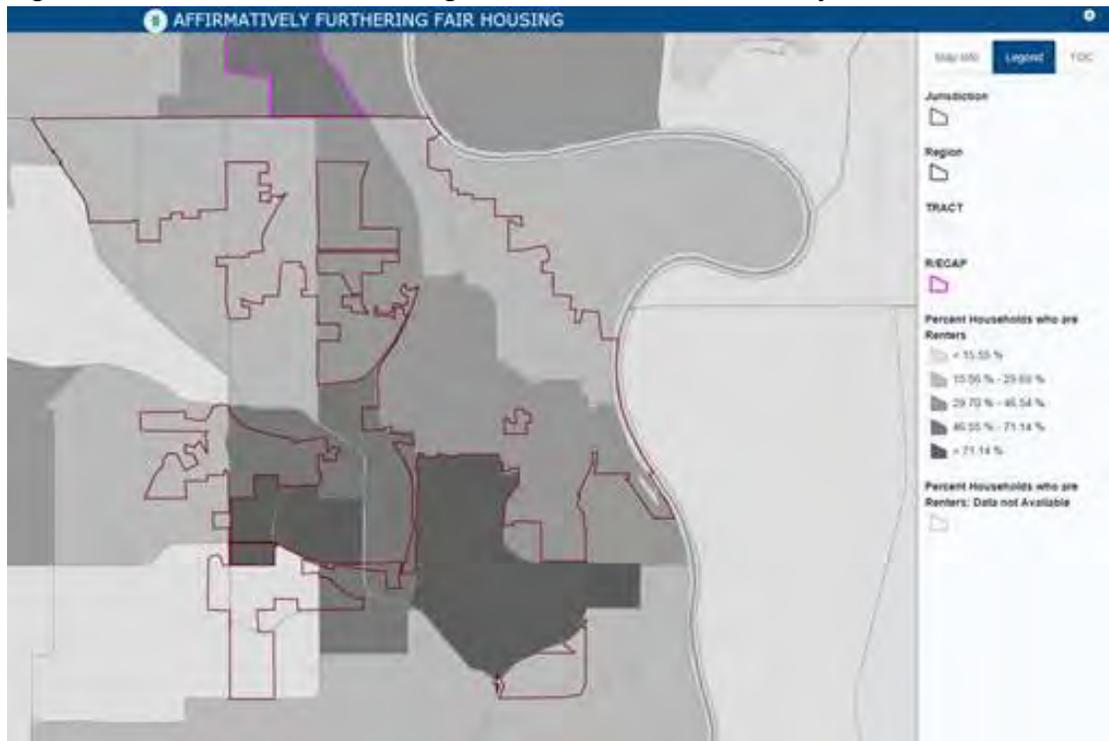
- Kirn Gym, Harvest Artist Lofts and Prime Square developments in the historic center
- Gunn School and Indian Creek Apartments located in the east end on North Broadway
- Dillman Place, Copper Creek, Sherwood Place, The Rose of Council Bluffs and Kaneshville Heights located on the east side

Additionally, the City is working with a development firm to construct an affordable senior housing complex in the west end as part of the first phase of new housing adjacent to the West Broadway Corridor. To the east, the City is working with three separate projects to bring additional senior housing:

- Immanuel Pathways: 56 units consisting of one and two-bedroom
- Agemark Senior Living: memory care facility to serve 36 Alzheimer's and other dementia-related conditions
- Presbyterian Homes and Assisted Living, Inc.: 36 independent living apartments, 24 assisted living apartments, 18 memory care units and 72 care center beds (150 total beds)

BELLEVUE

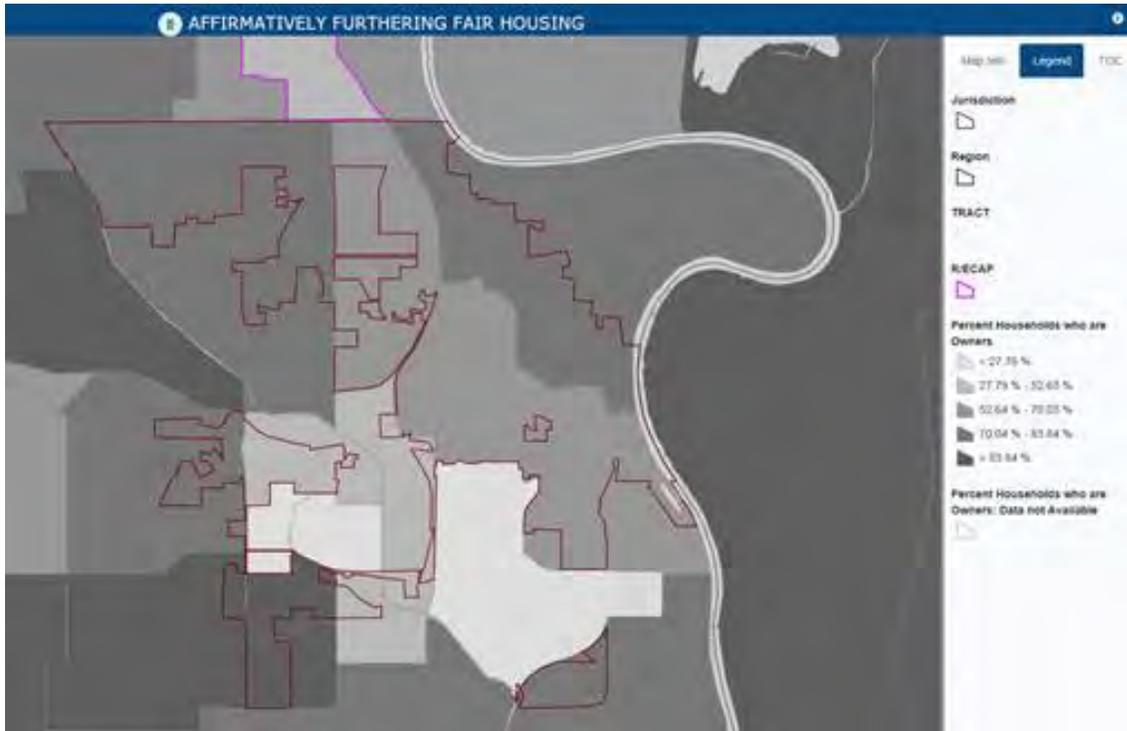
Figure V -30 Bellevue Percentage of Rental Households by Census Tract



Source: HUD Map 16 Housing Tenure; Percentage Who Are Renters

As shown in HUD Map 16 for Housing Tenure, Bellevue's highest rates of renter occupied units is located on Offutt Air Force Base and in military housing which is located on federally owned property. Both areas have the highest percentage of households that are renters at greater than 72%. Other concentrations of renter occupied units are located in southern Bellevue. The neighborhoods in southeast Bellevue include the older neighborhoods that contain smaller, affordable units. Highway 370 runs east/west through south central area of Bellevue. Many multi-family developments are located along the transportation corridor which leads to high rates of renter occupied units.

Figure V -31 Bellevue Home Ownership



Source: HUD Map 16 Housing Tenure; Percent Households Who Are Owners

Greater rates of owner occupied units are located in newer development areas. These areas are concentrated in western and southwestern Bellevue.

Bellevue's development began along the Missouri River in the eastern part of the community. As growth continued, new development continued west along north Bellevue closer to Omaha before expanding west and southwest where most recent housing developments are located.

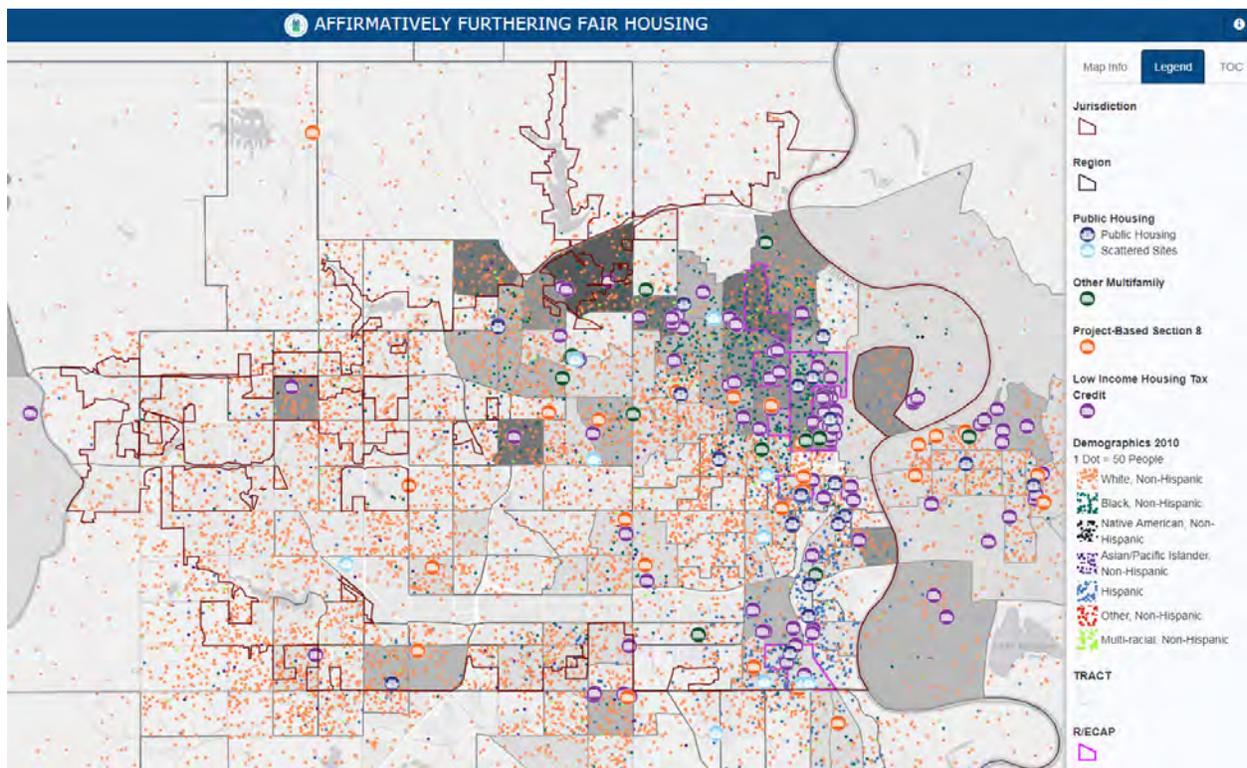
The older neighborhoods which are located in the eastern areas of Bellevue along the river continue to contain more renter occupied housing units. These areas are also the more affordable housing units due to size of units and age.

e. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future. Participants should focus on patterns that affect the jurisdiction and region rather than creating an inventory of local laws, policies, or practices

OMAHA

It is likely that the continual concentration of affordable housing in northeast and southeast Omaha has contributed to segregation in the region. HUD Map 5, Publicly Supported Housing and Race/Ethnicity, demonstrates there is also a concentration of Section 8 voucher units, multi-family, and low-income housing tax credit properties in the areas of Omaha east of 72nd street. Omaha has had a history of NIMBYism or “Not In My Backyard” mentality from neighborhoods and Homeowner Associations to the west of 72nd when affordable and publicly supported housing projects have been proposed. This community opposition is a contributing factor to segregation in the Omaha area.

Figure V -32 Omaha Publicly Supported Housing and Race/Ethnicity



Source: HUD Map 5 Publicly Supported Housing and Race/Ethnicity

The City of Omaha Code of Ordinances provides incentives for developers who incorporate affordable housing (Chapter 55, Article 10, Section 55-785). However,

developers wishing to include affordable housing have to apply for a conditional use permit (Chapter 55, Article 10, Section 55-882). This application process includes the requirement of the developer to “meet with and receive input from each interested party” (Chapter 55, Article 10, Section 55-883). Interested parties are listed as those with properties near or adjacent to the potential development, including neighborhood associations. In theory, making sure developers discuss land use and projects with stakeholders and residents in the area is important to allowing established businesses and residents have a say in what happens in their community. Unfortunately, it can also provide a platform for stigma associated with “affordable housing” to prevent the creation of affordable housing and more mixed income neighborhoods.

As housing prices continue to rise in the Omaha area, multiple neighborhood and community advocacy groups are discussing the need for affordable housing and concern with displacement. Many residents voiced strong support for more affordable housing during the public engagement process for the fair housing assessment. Residents requested that housing be distributed more equally throughout the city and located near transportation to increase connectivity in the region and access to amenities and opportunities.

Another current practice that contributes to lack of affordable housing and segregation in Nebraska are policies associated with Sanitary and Improvement District (SIDs). Dr. Palma Strand, Professor of Law at Omaha’s Creighton School of Law has studied the inequity created by Omaha’s SID policies in depth. Strand (2017) reports that lack of affordable housing in west Omaha is being greatly impacted by current structure of state statutes and annexation process associated with SIDs.

SIDs are taxing districts created by developers to help fund the completion of amenities and services to new housing communities. Residents agree to pay a higher tax to help fund the infrastructure necessary to support the newly built area where they live. In turn the developers receive benefits through different avenues of government financing. They were created in late 1940’s as a way to help cities provide adequate services to growing suburbs (Strand, 2017).

Because SIDs rely on developers making a profit, they are more likely to construct higher end and market-rate only housing in order to minimize their risks. According to Dr. Strand, “Mixed-income and multi-family developments that would provide housing affordable by households of more modest means, as well as mixed-use developments, are perceived as riskier investments; therefore, they are not constructed (2017).” Although SIDs may be responsible for streets, sewers and power, and can also buy land for public parks, developers are not held to the same requirements as cities when providing these services. Without the same federal requirements, such as the mandate

to affirmatively further fair housing, developers can avoid adhering to regulations that include protected classes in the design of cities. The lack of regulation frees developers from the duty to provide affordable housing. According to Dr. Strand, the SIDs are currently providing almost exclusively market-rate housing to a majority of White residents (2017).

Another example is the exemption of these SIDs from complying with the Americans with Disabilities Act (ADA). With no requirement to create complete streets or accessible sidewalks in the construction of their neighborhoods, these SIDs limit access for persons with disabilities. If the City of Omaha annexes these SIDs, these areas remain unaffordable to residents at the average median income and inaccessible for many residents with mobility impairments.

COUNCIL BLUFFS

Although Iowa is located in the heart of Middle America, it has always been more progressive than most of the states in the Union. Examples include:

- 1846: Iowa demonstrated its acceptance of religious minorities by allowing safe passage of the Mormons through western Iowa who were fleeing religious persecution in Illinois.
- 1868: Iowa became the second state to outlaw segregated schools... ninety years before the rest of America. The Iowa State Supreme Court ruled, in the case brought before it by Alexander Clark of Muscatine, that all children in Iowa must attend the same schools.
- 1873: The Iowa State Supreme Court ruled that African Americans are entitled to equal treatment in public accommodation.
- 1884: The Iowa Civil Rights Act was passed. It prohibited discrimination in public accommodation. It was one of the first civil rights acts in the nation.
- 2005: On June 17th, the Iowa State Supreme Court, in *Alons v Iowa District Court*, ruled that a same-sex couple who had been legally joined in another state could be divorced under Iowa law.
- 2008: The Council Bluffs City Council banned discrimination in Council Bluffs due to sexual orientation AND gender identity.
- 2009: On April 3rd the Iowa State Supreme Court handed down a unanimous decision in *Varnum v Brien* in favor of full marriage equality for gays and lesbians. Due to the stay on the 2007 district court ruling, this made Iowa officially the third state to allow marriage equality.

Specific to Council Bluffs, members of protected classes are represented on City boards and commissions dealing with housing issues. Currently, all City and MHA boards are gender balanced with some minority and disabled representation but this could be expanded to include protected populations.

- Community Development Advisory Committee (CDAC): gender balanced
- Civil Rights Commission (CRC): gender balanced with two racial minorities and two LGBTQ+ members
- Planning Commission: gender balanced
- Zoning Board of Adjustment: gender balanced with one racial minority
- Historic Preservation: gender balanced

BELLEVUE

While Bellevue grew substantially between 1990 and 2010, the breakdown of the population between residents of different races and/or ethnicities remain relatively the same. The Hispanic population grew substantially more than any of the other minority group. Segregation has remained in the low category, but if it continues along the same growth rate it will become moderately segregated. Specifically, this is impacting the Hispanic population settling in northern Bellevue closer to the south Omaha neighborhoods.

2. Additional Information

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

OMAHA

Based on community and stakeholder feedback regarding the LEP community, specifically refugees and new immigrants, they are also experiencing segregation. HUD data from the 2010 Census doesn't reflect the current numbers and locations of refugees that have settled in the region. According to the US Department of State: Bureau of Population, Refugees and Migrations' Office of Admissions, between 2011 and 2017, at least 2,505 refugees from 20 different countries have settled in Omaha. A majority of these refugees live in Northeast and Southeast Omaha. See Attachment G.

The table below was created based on data provided by the Omaha Multicultural Welcoming Alliance.

Table V-11 Omaha Refugee Communities

Refugee Community	Nation of Origin	Primary Language(s) Spoken	General Area of Residence
Bhutanese	Bhutan and Nepal	Nepali	Midtown including: Saddlecreek to Benson, and along the Dodge Street Corridor (East and West of 42nd and Dodge), to the North in neighborhoods of Walnut Hill, Gifford Park, Joslyn Castle
Karen and Karenni	Myanmar (Burma)	Karenic languages, Kayah and/or Tibeto-Burman languages	Prospect Village, Benson, Bemis Park, Gifford Park
Chin	Myanmar (Burma)	Chin languages, Burmese, and Tibeto-Burman languages	Prospect Village, Benson, Bemis Park, Gifford Park
Somali	Somalia	Somali and Arabic	Scattered throughout Northeast Omaha, in South Omaha Southside Terrace/Indian Hills South area
Sudanese and South Sudanese	Sudan	Arabic and Nuer	Scattered throughout Northeast Omaha, Papillion, and Bellevue
Iraqi	Iraq	Arabic	Millard
Syrian	Syria	Arabic	Scattered throughout West Omaha and Northeast Omaha

Source: Ann Marie Kudlacz, Omaha Multicultural Welcoming Alliance

As a part of the fair housing assessment, City of Omaha Human Rights and Relations and Planning staff met with refugee and new immigrant families through a partnership with Lutheran Family Services. In order to gain a better understanding of the challenges of refugee and new immigrant families, City of Omaha employees met with 30 individuals who have recently arrived in Omaha from across the world. Through the assistance of an interpreter, City staff asked a series of eight questions related to housing, employment, transportation, and potential experiences of discrimination.

See Attachment E. According to the experiences of these individuals, challenges for new immigrant and refugee families include the following:

- Affordability
- Size of affordable units (needing housing for larger families)
- Experiences of discrimination in both housing and employment

Many refugee families are placed in areas in Omaha within census tracts currently identified as R/ECAPs (Racially and/or Ethnically Concentrated Areas of Poverty-see section ii for R/ECAP maps). Federal law only allows for 90 days of resettlement orientation and support in finding housing, jobs, transportation, and learning the language; after which time new arrivals are on their own. Placing new arrivals together helps them acclimate better as it gives people a sense of community and a support network of friends and extended family. Many refugee families later purchase or rent homes near each other in census tracts in or to the west of the R/ECAP areas once they are able to move out of the apartments.

The majority of refugee families are being settled in areas already burdened by housing and environmental issues, as well as access to proficient schools, employment, and transportation (see Disparities in Access to Opportunity). Although the location of the refugee families is concentrated to areas of the city that are already highly segregated, some of the refugee families surveyed did not perceive this segregation/discrimination. Many stated that they believed learning English would help them overcome the barriers they have experienced in accessing opportunities.

COUNCIL BLUFFS

Local data gathered during the outreach process discussed segregation in Council Bluffs and included a discussion of why the City does not have a larger number of Black/African Americans as compared to Omaha. With the proximity to the R/ECAP areas in North Omaha, observers would presume Council Bluffs would have a higher concentration of this population. Stakeholders stated they believed African Americans choose not to live in Council Bluffs not because of racial tension but so they can be closer and surrounded by a similar population. There is still a perceived segregation in Council Bluffs concerning racial and ethnic backgrounds but the extent is unknown, as the public process did not produce conclusive results.

Segregation is still an issue in the state. For example, Iowa has a relatively low incarceration rate at 282 per 100,000 adults, compared to the national average of 392 per 100,000 adults. However, the incarceration rate for Black Iowans was 11 times higher than for Whites – the fourth highest in 2014 according to The Sentencing Project; a Washington, D.C. based nonprofit (Attachment H).

BELLEVUE

HUD defines segregation a high concentration of persons of a race, color, religion, sex, familial status, national origin, or having a disability or a type of disability in a particular geographic area when compared to a broader geographic area. The Table below demonstrates racial distribution by census tract.

When looking specifically at the table below, the highest percentage of minority population lives in north central Bellevue, in Census Tracts 101.08 and 101.07. This is followed by Census Tracts 103.06 and 103.05 which are in designated military base housing.

Table V-12 Bellevue Demographics by Census Tract

Census Tract	One Race						Two or more Races	Census Tract Total	Minority Percentage
	White	Black/ African Amer.	Amer. Indian/ Alaska Native	Asian	Native Hawaiian /Other Pacific Islander	Some Other Race			
101.03	3,920	169	20	72	0	54	119	4,354	10.0%
101.04	1,489	91	10	36	7	98	70	1,801	17.3%
101.05	2,389	222	26	93	7	96	109	2,942	18.8%
101.06	3,319	263	28	80	32	152	171	4,045	18.0%
101.07	2,448	189	27	100	7	432	169	3,372	27.4%
101.08	2,435	503	19	118	8	296	221	3,600	32.3%
102.03	4,281	183	11	89	4	50	150	4,768	10.2%

102.04	2,763	348	18	92	9	106	145	3,481	20.6%
102.05	4,675	302	20	131	5	46	257	5,436	14.0%
102.06	3,307	356	18	126	6	64	205	4,082	19.0%
102.07	2,026	135	7	71	4	37	81	2,361	14.2%
103.02	764	106	11	24	3	27	59	994	23.1%
103.05	1,318	181	11	26	14	58	170	1,778	25.9%
103.06	1,416	161	20	52	3	72	154	1,878	24.6%
104.01	2,098	206	22	122	0	137	107	2,692	22.1%
104.02	3,535	165	62	103	5	123	192	4,185	15.5%
105.01	5,205	351	48	176	3	684	257	6,724	22.6%
105.02	3,654	95	30	45	4	345	114	4,287	14.8%
105.03	2,955	66	17	53	5	223	85	3,404	13.2%

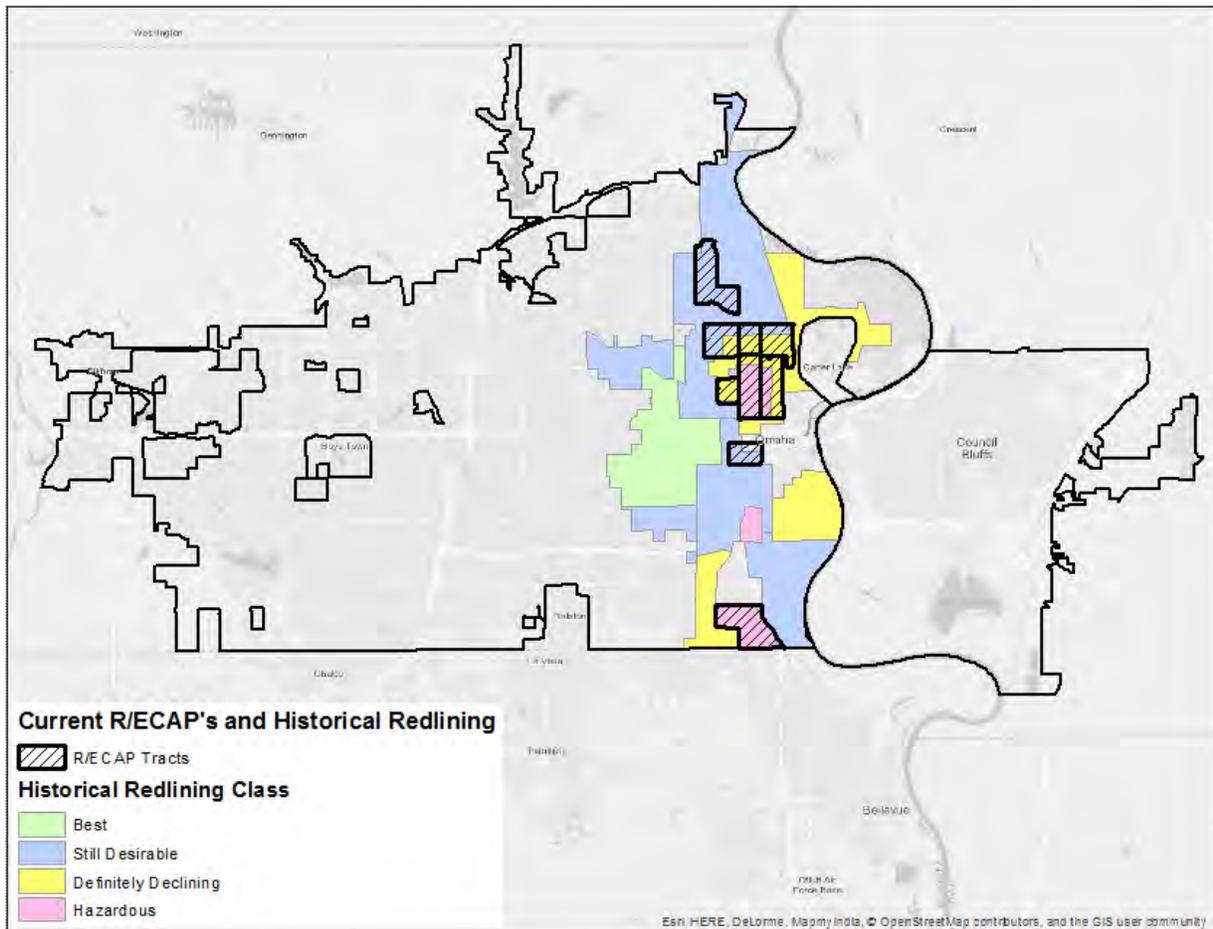
Source: U.S. Census Bureau, 2010 Census Data by Census Tract

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

OMAHA

The map below indicates that current segregation has been impacted by former practices of institutional racism including redlining and blockbusting.

Figure V -33 R/ECAPS Omaha Jurisdiction 2016 Combined with 1935 HOLC Redlining Data



Source: 2016 ACS, 1935 HOLC Redlining Maps

Areas once defined as “definitely declining” and “hazardous” are home to many of the current R/ECAP designations. Although the Fair Housing Act of 1968 was created to reverse the effects of these practices, it was followed by a period of social unrest and poor development practices including:

- White flight and the movement of employers out of North Omaha and to the western portions of the city following the Fair Housing Act of 1968
- Race riots of the 1960's and 1970's
- High levels of unemployment and increasing cost of transportation due to the location of employers
- Construction of the North Freeway in the 1970's dividing neighborhoods and removing housing stock
- Closing of 16th Street in 1970 closing off North Omaha from the downtown Omaha business district
- Loss of density for homes and businesses due to disrepair and demolition
- Lack of private and public investment to revitalize these neighborhoods until recent years

3. Contributing Factors of Segregation

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

OMAHA

Community opposition: Cultural attitudes regarding ability, race and poverty are barriers to integration. Historic segregation laws, policies, and investment practices affected the location of minorities in the Omaha area. As those laws and policies were repealed or modified, community opposition to integrated communities limited housing options for many minority households.

Lack of private investments: Private investment in Northeast and Southeast Omaha has been low compared to the investment in Western Omaha. There has also been a lack of a unified community revitalization strategy between the City, non-profit organizations, developers, and the philanthropic community. This trend appears to be changing with more recent collaborative efforts from community stakeholders focused on development and supportive programming in targeted neighborhoods in Eastern Omaha.

Loss of Affordable Housing: Lack of resources and funding mechanisms to rehabilitate aging homes particularly in Northeast Omaha has led to condemnations and demolition of many homes. Additionally, efforts to revitalize downtown Omaha has improved the quality of housing but increased the price of many units displacing persons depending

on affordable housing and making relocation in downtown unaffordable for many low to moderate income households difficult.

Location and type of affordable housing: The location of affordable housing in Omaha has contributed to segregation. The vast majority of affordable housing is located in the eastern half of the City and more specifically, east of 72nd Street. Many families that need affordable housing, need larger units that either aren't available or aren't affordable.

Lending discrimination: Redlining practices helped to shape original patterns of segregation. Current complaints of discrimination (see fair housing enforcement) based on race/ethnicity show there are still barriers to lending for minority households. Locations of payday lenders in minority majority communities.

Source of income discrimination: Lack of landlords willing to accept Housing Choice Vouchers in high opportunity areas also contribute to segregation.

Private discrimination: Results from the Regional Fair Housing Survey indicated that many minority residents feel unwelcome and unwanted in the western portion of the City, where neighborhoods are nearly all White. Conversely, some survey respondents who identified as White also said they did not feel welcome in majority minority neighborhoods. The survey revealed that the perception of racism and discrimination that likely contributes to the segregation of the City.

COUNCIL BLUFFS

Contributing factors to segregation in Council Bluffs include:

1. Cultural attitudes regarding race and poverty
2. Access to publicly supported housing for persons with disabilities
3. Lack of assistance for transitioning from institutional settings to integrated housing

BELLEVUE

Community opposition: Bellevue faces what many communities face regarding alleged community opposition to minorities and development of additional public housing units. With limited citable instances and lack of supporting data, this community opposition appears to be perceived by surrounding communities and could be addressed with education and outreach.

With limited open land available for growth and focus more on economic development, the creation of additional public housing and affordable housing units lack support. In 2015, the Bellevue Housing Authority completed construction of two new duplex for affordable housing. This project did not receive any community opposition. During public input sessions, those that live outside of the jurisdiction felt there was a perceived targeting of minority individuals by law enforcement.

Since the data does not show specific areas of segregation in the community, the City needs to work to provide outreach to minority populations and create a positive perception of the community to outsiders. This could include working with realtors and financial institutions to assist with outreach and programs to focus and invite minorities households to Bellevue.

Land use and zoning laws: The City of Bellevue Planning Commission reviews all zoning ordinances and land development proposals for consistency with the city comprehensive plan and can make recommendations to the City Council regarding requested changes to these ordinances. This can create situations in which municipalities have institutional barriers to affordable housing, such as minimum lot sizes and setbacks, that limit density. With available land becoming limited and Bellevue becoming landlocked by surrounding communities and natural barriers, future development of affordable housing will become more challenging with the political environment supporting more economic development.

ii. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

1. Analysis

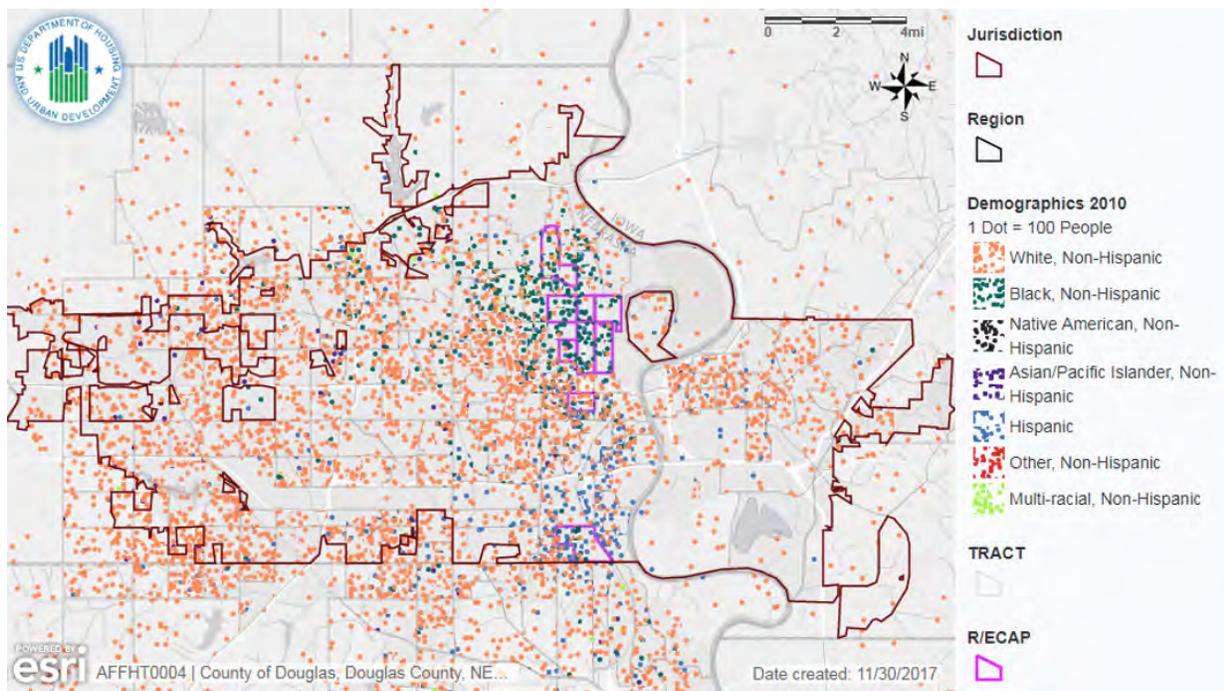
Omaha

The City of Omaha is the only jurisdiction with the region that currently has R/ECAPs.

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

The U.S. Department of Housing and Urban Development (HUD) defines a Racially or Ethnically Concentrated Area of Poverty (R/ECAP) as a census tract where: (1) the Non-White population comprises 50 percent or more of the total population and (2), the percentage of individuals living in households with incomes below the poverty rate is either (a) 40 percent or above or (b) three times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower.

Figure V -34 Current R/ECAP and Demographics Omaha



Source: HUD Map 1 Race/Ethnicity

OMAHA

R/ECAPs within the Omaha Consortia based on 2010 Census data include census tract 24 in south Omaha and a large cluster of census tracts in northeast Omaha comprised

of census tracts: 6, 7, 8, 11, 12, 40, 51, 59.01, 59.02, 60, and 61.01. All of the R/ECAP areas are concentrated in older sections of Omaha, with much of the housing stock dating to the late 19th and early 20th centuries.

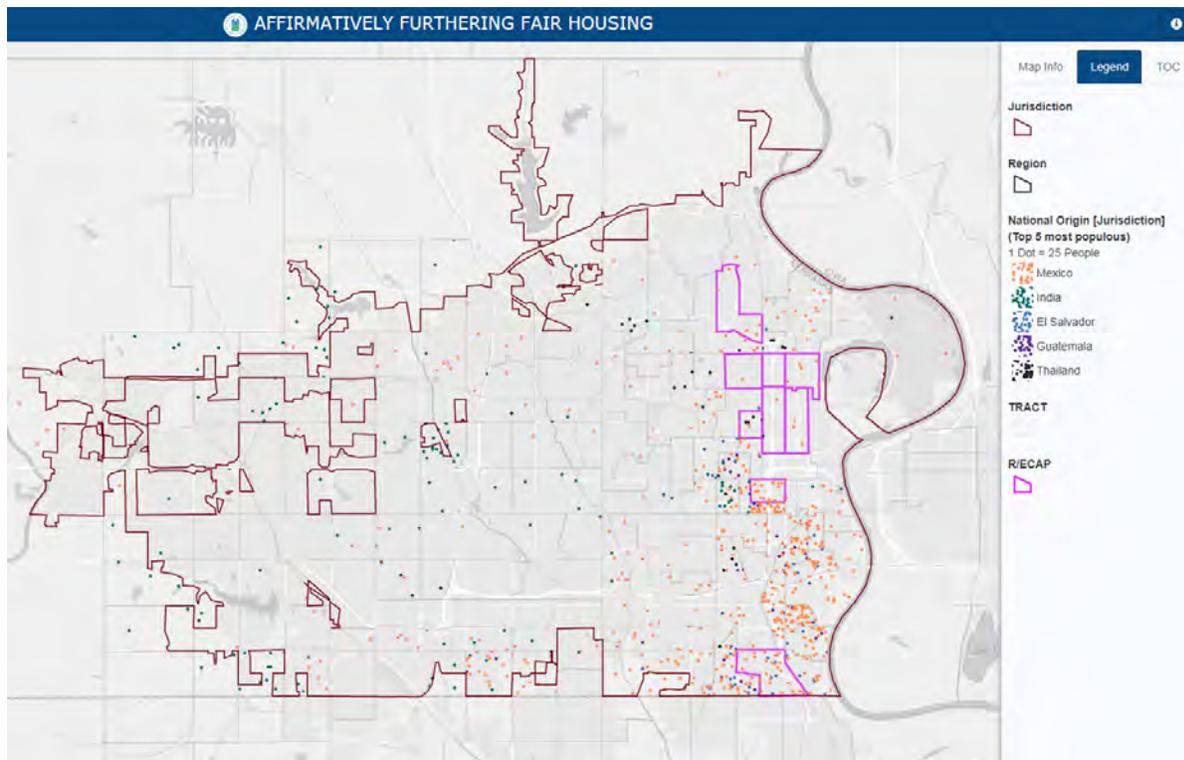
- The large swath of R/ECAPs in north Omaha is primarily composed of Black, non-Hispanic populations while the R/ECAP for census tract 24 in south Omaha is predominantly Hispanic. Tract 24 includes the historic Vinton Street and Deer Park area which is an active neighborhood commercial and retail center. However, it is cut-off from the main south Omaha Hispanic and Latino cultural hub of South 24th Street by Interstate 80.
- Expansion by both Black and Hispanic populations can be seen in the map above into surrounding census tracts and beginning to emerge in tracts with predominantly White populations farther west along major corridors such as Interstate 80 in south central Omaha, Q Street in south Omaha, and the Interstate 680 - Sorensen Parkway area in northwest Omaha. However, the central area of Omaha and areas west of Interstate 680, as well as other census tracts within the consortium area jurisdiction and region continue to have little racial diversity.
- With the exceptions of census tracts 40 and 51, the R/ECAPs in north Omaha all have much smaller White and Hispanic populations than the R/ECAP in south Omaha. The difference these two tracts exhibit is due to their proximity to desirable areas. Tract 40 includes Midtown Crossing, an upscale residential, commercial and office area, and the Dodge and Leavenworth Street corridors. Census tract 51 is adjacent to Midtown Crossing and includes the historic residential areas of Bemis Park and Gifford Park. Many of the homes in the area have been restored and the area has active neighborhood associations. Both tracts 40 and 51 have seen a recent influx of condo and apartment development which is highly sought by people wanting to live in trendy neighborhoods close to downtown and near large employers and transportation along the Dodge Street corridor.
- The remaining R/ECAPs in north Omaha are predominantly Black. R/ECAP census tracts 6, 7, and 11 align along the Highway 75/North Freeway corridor which began construction in the early 1970's and created a significant splitting and loss of neighborhood connectivity within the area. Rather than widening already existing commercial corridors, the highway demolished established residential areas and by-passed existing commercial areas.
- To the east, R/ECAP census tracts 8 and 12 align with North 24th Street, which was a primary commercial corridor and functioning streetcar route until 1951. Census tracts 8 and 12 are bounded on the east by railroad tracks and industrial areas, many of which were originally built in the late 19th Century. While there have been periods of investment in the area, it is now primarily identified by

poverty, industrial activity, vacant property, empty lots and limited commercial or retail providers.

- The remaining R/ECAP census tracts, are primarily residential with only limited commercial activity occurring along Ames Avenue, an east-west corridor, and North 30th Street to the east. Sorensen Parkway, a curvilinear, limited-access drive, and Fontenelle Boulevard, a residential drive, are the other main arterials in the area.
- All of the R/ECAP areas fall within the EPA Lead Superfund Focus Area with the exception of census tract 61.01.

b. Describe and identify the predominant protected classes residing in R/ECAPs in the jurisdiction and region. How do these demographics of the R/ECAPs compare with the demographics of the jurisdiction and region ?

Figure V -35 Omaha National Origin by Census Tract



Source: HUD Map 3 National Origin; Dot Density 1:25

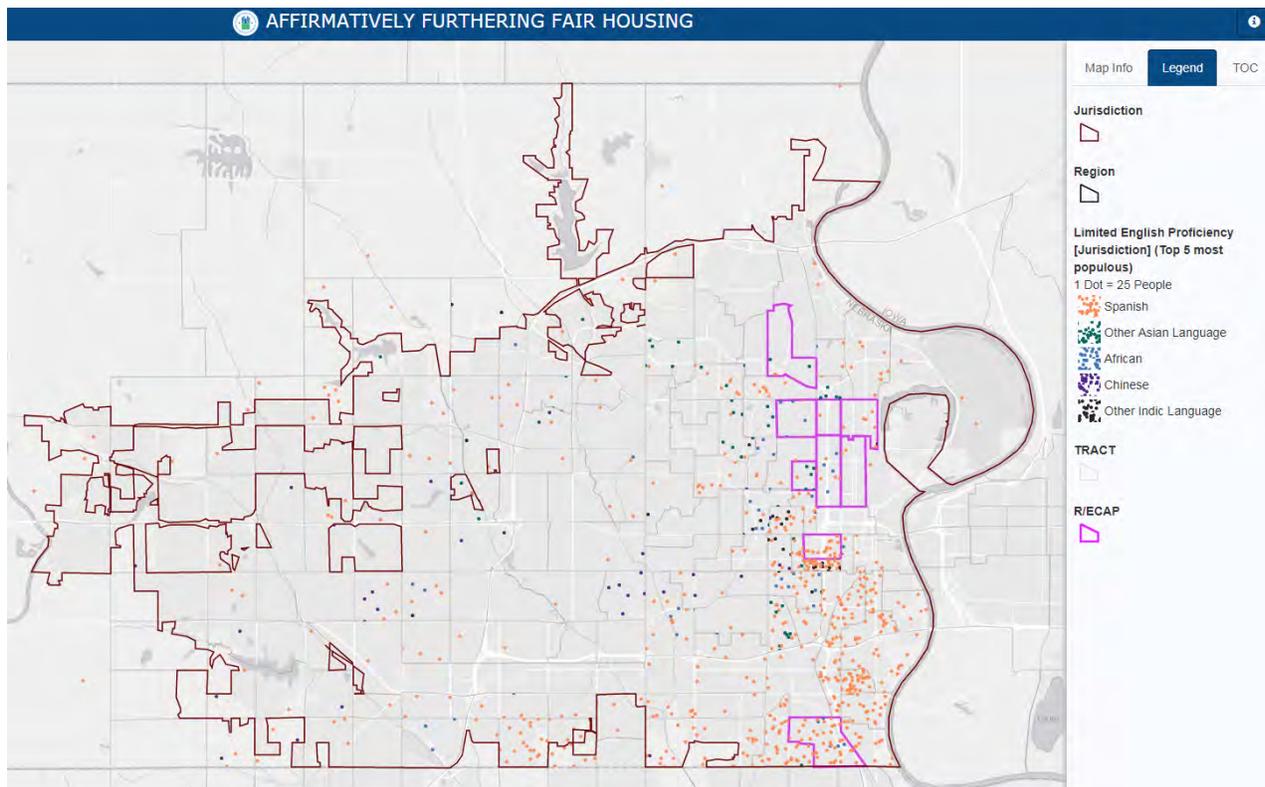
Half of the R/ECAPs within the Omaha Consortia area have relatively small but diverse groups of foreign-born residents, with 2% or less of the population having a different national origin. They represent nationalities from East Asia; South Central Asia;

Southwest Asia and the Middle East; South, West and East African countries; the Caribbean; and Central and South America.

As seen in Map 3 above, many non-R/ECAP census tracts within the Consortia area have much higher concentrations of populations from other nationalities than some of the R/ECAP areas. However, four R/ECAPs, representing census tracts 6, 8, 51, and 60, have nearly 5% to almost 10% of their population originating from a foreign place of birth. In each of those census tracts, the primary foreign nationality is Mexican, with smaller percentages from El Salvador, Guatemala, and Thailand. The only exception is census tract 6, in the northern portion of the R/ECAP cluster. In that Census tract, the primary foreign place of origin is Thailand, representing 9.21% of all residents.

The two R/ECAP areas with the highest concentrations of foreign-born populations are census tracts 40 and 24. In census tract 40, in the southern portion of the R/ECAP cluster, 17.83% are of Mexican origin. In census tract 24, in south Omaha, 27.56% are of Mexican origin, and about 1% to 2% are natives of El Salvador and Guatemala. These concentrations are most likely due to proximity to jobs, friends and family already established in south Omaha, and the many culturally relevant shopping and services available in the area. The hub of Omaha's Latino and Hispanic community is in south Omaha along South 24th Street. As mentioned earlier, Vinton Street and the Deer Park neighborhood in census tract 24 is a disconnected offshoot of that hub, separated by Interstate 80. South Omaha is also the home of large meat packing and other industrial employers, which are often the source of first employment for many new immigrants. This is particularly true for new arrivals that may not speak English well or have limited educational backgrounds.

Figure V -36 Omaha Limited English Proficiency



Source: HUD Map 4 LEP; Dot Density 1:25

Limited English Proficiency (LEP) distribution within the R/ECAP areas is, not surprisingly, quite similar to the distribution of foreign-born populations. Spanish is by far the most common language among LEP populations in the R/ECAP areas. This is followed by Asian, African, Chinese, and other Indic languages. Areas of particular note are census tracts 24 and 40, the two southernmost R/ECAP areas, which have the highest concentrations of R/ECAP LEP populations. In census tract 24, 29.6% of the total population are LEP Spanish speakers with no other languages represented. In census tract 40, 17.25% of the population are LEP Spanish speakers, and 0.37% are LEP African language speakers.

The next largest area of LEP concentration is in census tract 6 in the north central R/ECAP area. Here 10.55% of the total population are LEP Asian language speakers and 1.05% are LEP Spanish speakers. This is followed by census tract 51 in the center of the R/ECAP area with a total population composed of 7.96% LEP Spanish speakers, 2.21% LEP African language speakers, and 0.71% LEP Chinese speakers. Census tract 8, in the north, accounts for the next largest area of LEP concentration and is the only R/ECAP area to have a concentration of other Indic language speakers. They make up 0.94% of the total population, while LEP Spanish account for 8.17% of the

population. The R/ECAP with the smallest concentration of LEP populations is census tract 61.01, the northernmost R/ECAP. Here 0.46% of the total population are African language speakers and 0.17% are Chinese speakers.

Overall though, the R/ECAPs do not represent the highest concentrations of LEP populations. Many of the census tracts immediately surrounding and to the south of the R/ECAP areas have much higher concentrations of LEP populations than the RE/CAPs themselves. These non-R/ECAP tracts also tend to have greater diversity among the language groups represented and include much larger concentrations of African, Asian and other Indic language populations. Throughout the jurisdiction and region, Spanish is still the dominant LEP language; however, there are small pockets of Tagalog, Slavic and many other languages not found in the R/ECAP areas. The fact that limited English proficiency is fairly widespread may be due to several factors including large enough population groups that the need to learn English is not very strong, low levels of literacy in general, and population age groups that may not have opportunities to interact with the larger English speaking population as often.

Table V-13 Omaha R/ECAP Demographics

		(Omaha, NE CDBG, ESG) Jurisdiction	
R/ECAP Race/Ethnicity		#	%
Total Population in R/ECAPs		24,490	-
White, Non-Hispanic		5,125	20.93%
Black, Non-Hispanic		12,705	51.88%
Hispanic		4,802	19.61%
Asian or Pacific Islander, Non-Hispanic		508	2.07%
Native American, Non-Hispanic		278	1.14%
Other, Non-Hispanic		92	0.38%
R/ECAP Family Type			
Total Families in R/ECAPs		5,268	-
Families with children		3,088	58.62%
R/ECAP National Origin			
Total Population in R/ECAPs		24,490	-
#1 country of origin	Mexico	2,072	8.46%
#2 country of origin	Sudan	359	1.47%
#3 country of origin	Other Eastern Africa	275	1.12%
#4 country of origin	Burma	244	1.00%
#5 country of origin	El Salvador	228	0.93%
#6 country of origin	Kenya	180	0.73%
#7 country of origin	Thailand	139	0.57%
#8 country of origin	Honduras	118	0.48%
#9 country of origin	Other South Central Asia	62	0.25%
#10 country of origin	Ethiopia	49	0.20%

Source: Table 4 R/ECAP Demographics

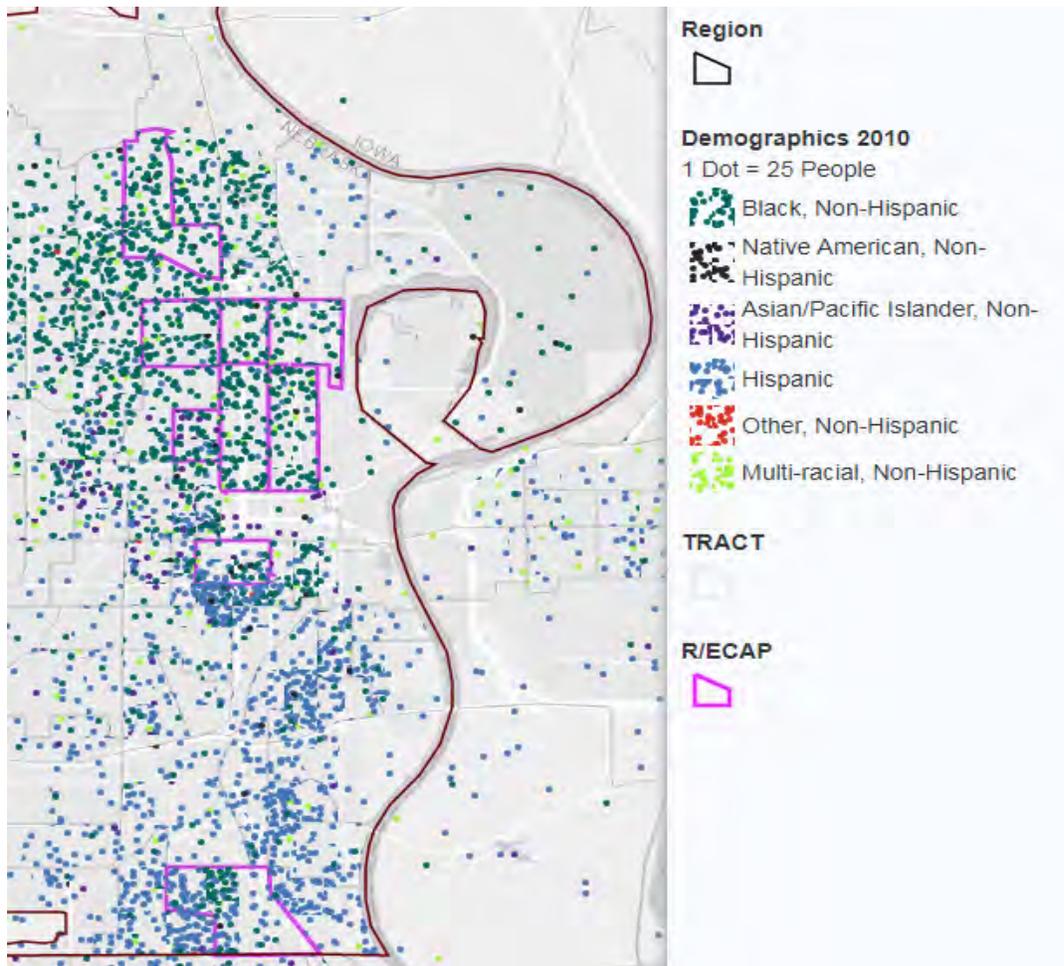
Race and Ethnicity

It is important to note that the R/ECAP areas identified in the jurisdiction (Omaha) are the only ones in the region; therefore, the R/ECAP demographics for the region are identical across all categories. When compared to the overall regional and jurisdiction populations, the R/ECAP areas represent a marked difference in population concentrations.

The predominant minority group residing within the Omaha Consortia R/ECAPs is Black. While the Black, non-Hispanic population in the region is 7.73%, Black residents account for 51.88% of the total population in R/ECAP Census tracts. The second largest minority group residing in the R/ECAP areas is Hispanic, making up 19.61% of the total population, compared to 8.96% of the region. Conversely, while White residents make up 78.72% of the region, only 20.93% of the R/ECAP population is White. Much smaller

percentages of 2% or less account for the remaining minority groups within the R/ECAP areas. They are Asian, Pacific Islander, Native American or other non-Hispanic populations.

Figure V -37 R/ECAP Race and Ethnicity Omaha



Source: HUD 2 Race/Ethnicity Trends; White, Non-Hispanic Removed; Dot Density 1:25

The percentages are only slightly different for the jurisdiction compared to the region. For the jurisdiction, the predominant population is White and makes up 70.66% of the total population. Black residents make up 11.9% of the total population and Hispanic residents are 12.3% of the population. There is little change among the other racial populations for the jurisdiction. These distribution differences between the R/ECAP areas and the regional and jurisdiction areas, indicate an extremely high level of racial concentration among the Black population within R/ECAPs, and to a lesser degree, high concentrations of the Hispanic population in R/ECAPs. Native Americans also tend to

be slightly more concentrated in R/ECAP areas, while Asian populations have a relatively steady dispersal rate within the R/ECAP areas, jurisdiction, and region.

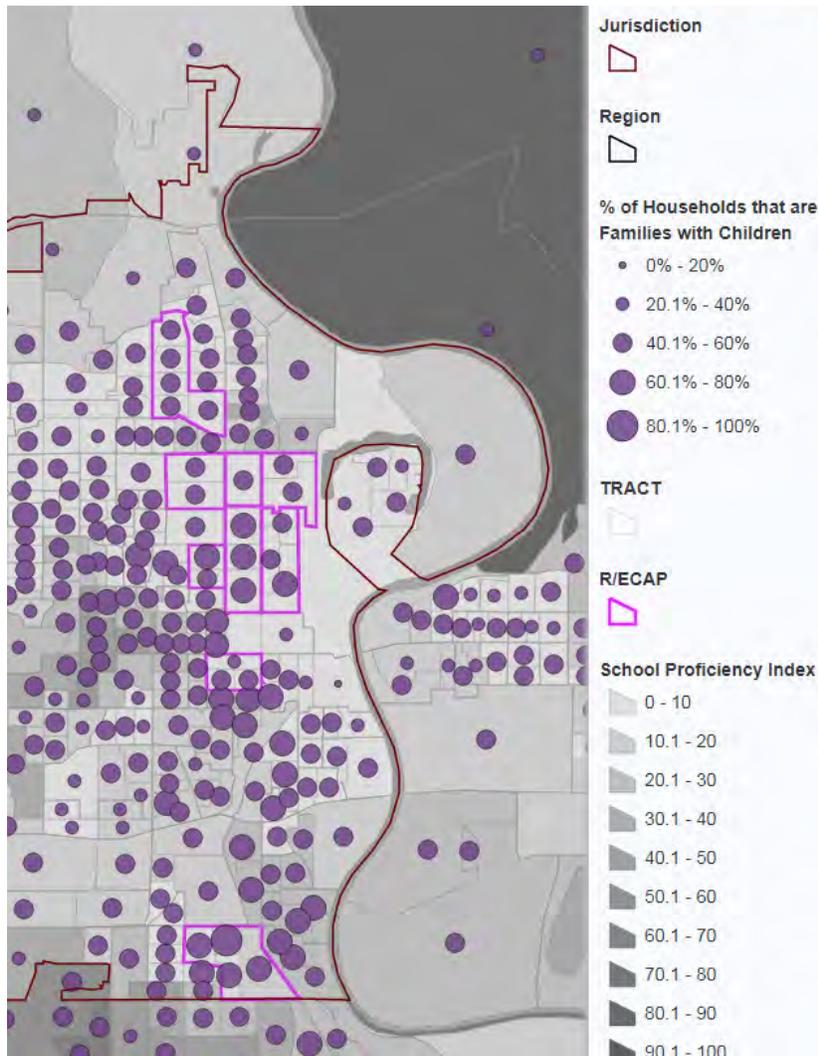
As mentioned earlier, R/ECAP census tracts 40 and 24 have large concentrations of protected classes based on national origin, with Mexico being the most common place of foreign birth within the region. In census tract 24, 27.56% of the total population is of Mexican origin, and in census tract 40, 17.83% of the total population is of Mexican origin.

Compared to the jurisdiction and the region, these two R/ECAP areas represent an unusually high concentration of people of foreign birth. People born in Mexico account for just 4.62% of the total jurisdiction population and 3.06% of the total regional population. In the R/ECAP areas, 8.46% of the total population were born in Mexico. Sudan represents the second largest nationality group in the R/ECAP areas accounting for 1.47% of the total population. Other nationalities are also represented, with each making up 1% or less of the total population in the R/ECAP areas.

Gender and Age

Data for gender and age for individual R/ECAP areas is not available in the AFFH mapping tool. The population within the jurisdiction, however, is 49.07% male and 50.93% female. Similarly, in the region the population is 49.33% male and 50.67% female. The majority of the population in both the region and the jurisdiction are between the ages of 18 and 64, making up about 63% of the total population. Children under the age of 18 make up about 26% of the population, while people aged 65 and older make up about 11% of the population.

Figure V -38 R/ECAP Omaha, Family Status



Source: HUD Map 7 Demographics and School Proficiency

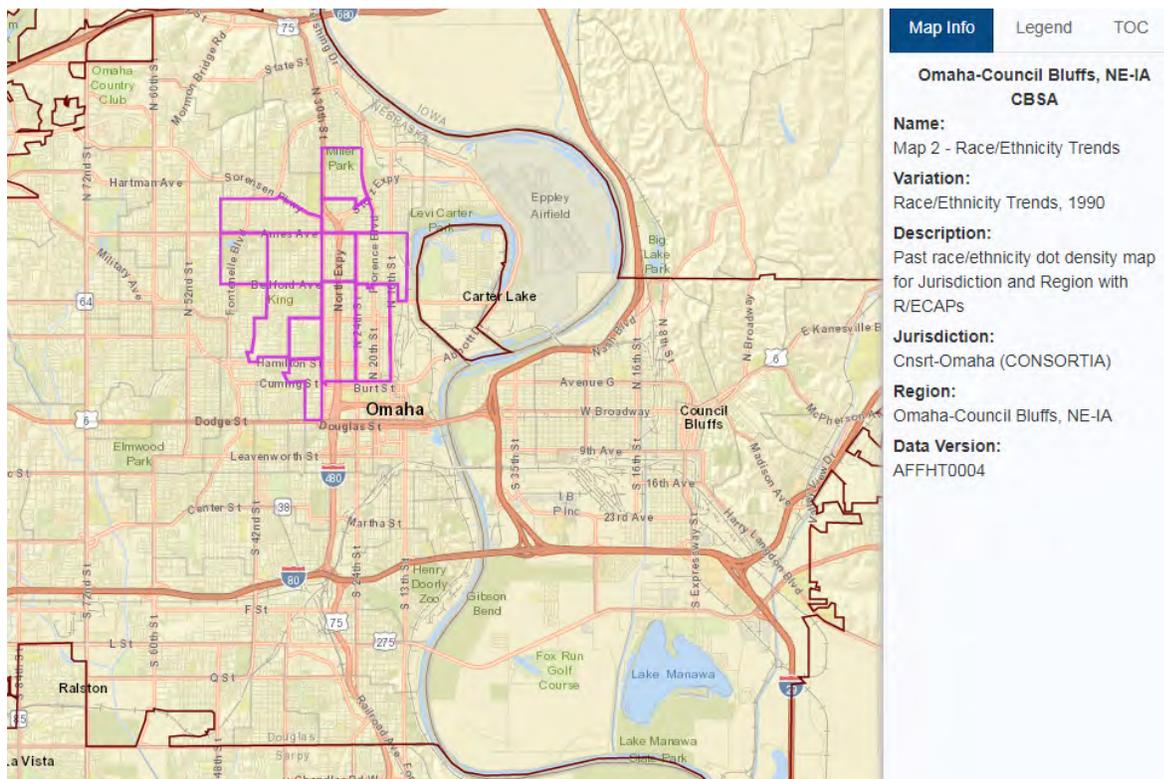
Familial Status, Persons with Disabilities and Other Protected Classes

Data for familial status is unavailable; however, 58.62% of the families in the R/ECAP areas consist of families with children. This is much higher than both the jurisdiction and the region. In the jurisdiction, 47.45% of families consist of families with children, and in the region 48.23% of families consist of families with children. R/ECAP populations with disabilities are discussed in Section D of this report. Data for religion, sexual orientation, and other protected categories are not available in the AFFH mapping tool.

c. Describe how R/ECAPs have changed over time in the jurisdiction and region (since 1990)

In addition to the changes in patterns of demographics and segregation/integration, Map 2 provides insight on the changes in concentrations of poverty among minority communities by outlining Racially/Ethnically Concentrated Areas of Poverty (R/ECAP). Observing the changes in the pattern of R/ECAPs also indicate patterns of segregation within Omaha’s jurisdiction.

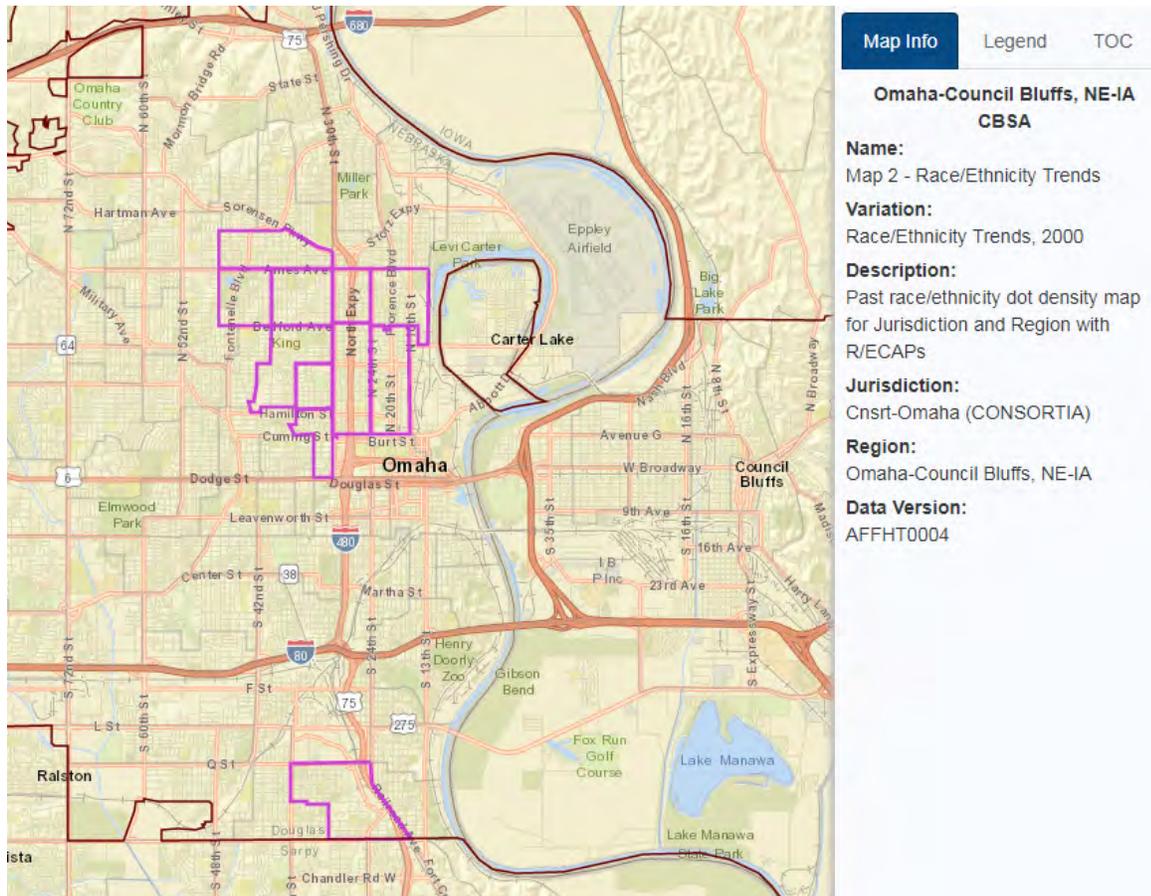
Figure V -39 R/ECAPS Omaha Jurisdiction 1990



Source: HUD Map 2 Race/Ethnicity Trends, Streets Background, No Demographic Data

In 1990 all twelve R/ECAPS were consolidated in North Omaha. These neighborhoods were primarily Black in 1990. The concentration of high levels of poverty in this area were a result of many different factors including those that were federally mandated in the form of housing discrimination prior to 1968 and the white flight of residents and businesses that followed the implementation of the Fair Housing Act.

Figure V -40 R/ECAPS Omaha Jurisdiction 2000



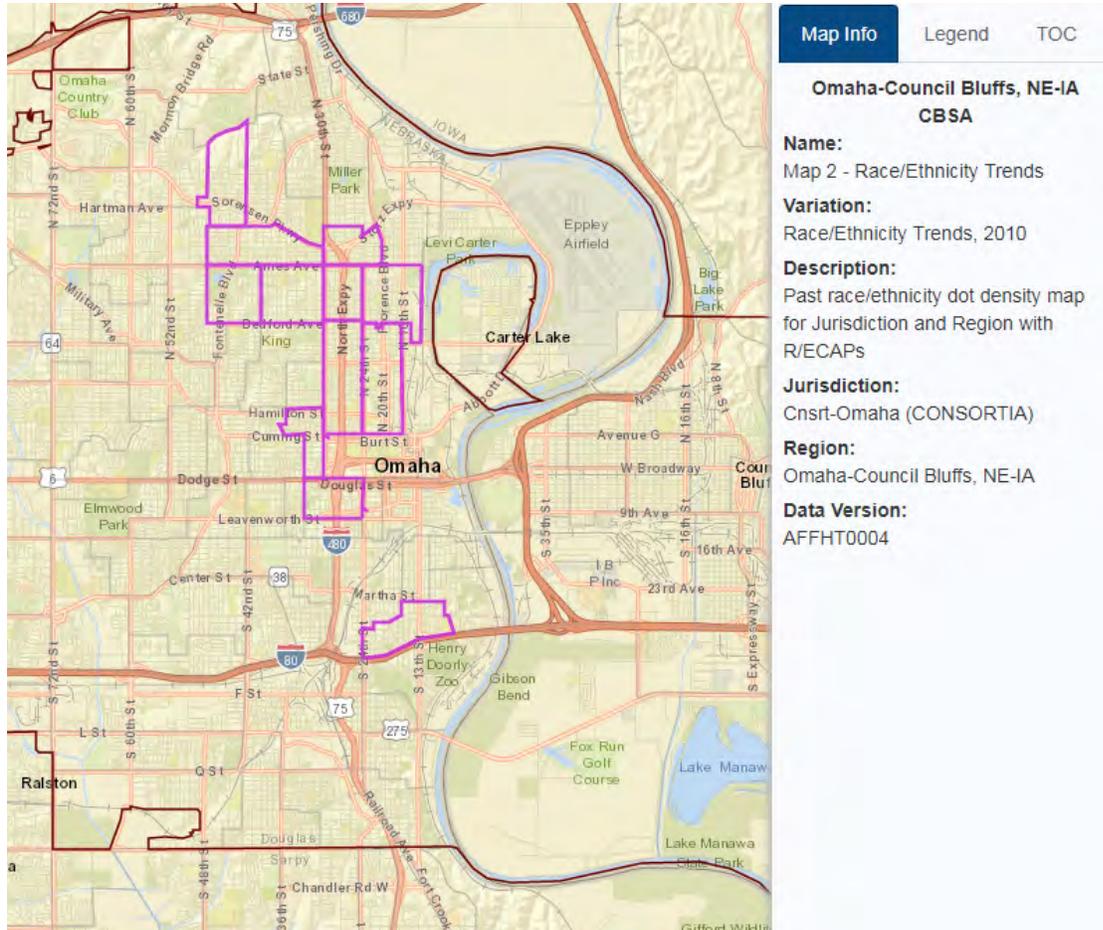
Source: HUD Map 2 Race/Ethnicity Trends, Streets Background, No Demographic Data

The loss of two R/ECAPs to the north and the addition of a R/ECAP in the far southeastern portion of the city shows the beginning of migration for Non-White residents out of North Omaha and the increase in population of Hispanic households already existing in South Omaha. The presence of one of Omaha Housing Authority's largest public housing communities, the Southside Terrace, is in the southern R/ECAP census tract. This complex provides homes for many new immigrant and refugee families because of the large number of 4, 5, 6, and 7 bedroom units.

The 2010 map shows an increase in the number of R/ECAPS from eleven back up to twelve. The continual migration of Non-White residents to the northwest and south as the population grows shifted the areas of concentrated poverty. The R/ECAP to the far south has moved further north to the Deer Park neighborhood located near the intersection of Interstates 80 and 480. This tract (24) includes the historic Vinton Street corridor which is an active neighborhood commercial and retail center. However, it is

cut-off from the main south Omaha Hispanic and Latino cultural hub of South 24th Street by Interstate 80.

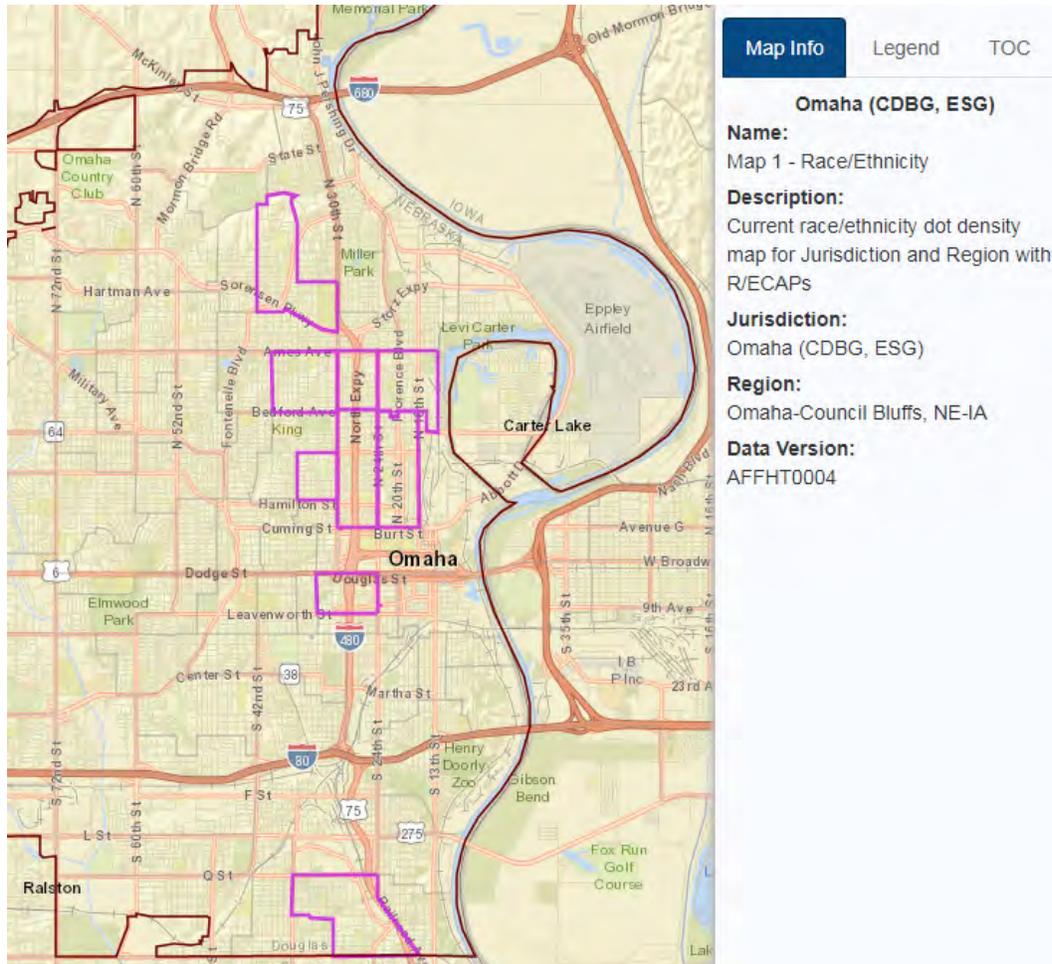
Figure V -41 R/ECAPS Omaha Jurisdiction 2010



Source: HUD Map 2 Race/Ethnicity Trends, Streets Background, No Demographic Data

The R/ECAPS once consolidated further north shifted to the south, with census tracts bordering the north and south of Dodge Street and downtown Omaha. The presence of several public housing towers and tax increment financing project for lower income households may have also impacted this southern movement of R/ECAPs. Census tract 51 is adjacent to Midtown Crossing and includes the historic residential areas of Bemis Park and Gifford Park. Many of the homes in the area have been restored and the area has active neighborhood associations. Both tracts 40 and 51 have seen a recent influx of condo and apartment development which is highly sought by people wanting to live in trendy neighborhoods close to downtown and near large employers and transportation along the Dodge Street corridor.

Figure V -42 Current R/ECAP Omaha



Source: HUD Map 1 Race/Ethnicity; Current R/ECAPs based on 2016 ACS Data

The current demographic map, based on 2016 ACS data, shows an decrease in the number of R/ECAPS from twelve down to nine. This may in part be do the beginning of economic recovery in the years following the 2008 housing crisis. The R/ECAP in the Deer Park Neighborhood is no longer present. This area was the location of the Omaha City Planning Department’s Holistic Revitalization Program from 2015 to 2017. The area post-2010 was already beginning to re-invest in the once booming Vinton Street business district and was due in part to active business owners along the corridor, an active neighborhood association, and City Council support. The R/ECAP to the far southern edge of the city has reemerged. The R/ECAP that bordered Dodge Street to the north has moved further north between Ames Avenue and Bedford Street. Development projects in midtown and downtown continue to improve the quality of housing but have also increased the prices in rental and homeownership driving residents in these areas to the south and north. Neighborhood revitalization in Bemis

Park, Walnut Hill, and Gifford Park may have also impacted the movement of the R/ECAP north of Dodge further north.

COUNCIL BLUFFS

According to the HUD R/ECAP data, Council Bluffs has zero R/ECAP tracts as reported in the 1990, 2000 and 2010 US Censuses. The 2010 Census found seven areas of concentration of minority residents. Census tracts 305.02, 306.02, 307, 308, 309, 313 and 314 are areas of concentration of Hispanic residents. There were no additional areas of concentration for any single minority group in 2010. These census tracts are located in the central and western portions of the City and also contain higher concentrations of residents living in poverty or who are low-to-moderate income.

BELLEVUE

There are currently no R/ECAPs in Bellevue.

2. Additional Information

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

Since 1990, R/ECAPs within the Consortia area, jurisdiction, and region have remained consistently anchored in North Omaha census tracts 7, 8, 11 and 12. This trend was influenced in part by destructive forces on the social and economic fabric of the area during construction of Highway 75 North in the early 1970's.

Over a span of two decades, homes were demolished, quiet residential streets and long standing neighborhoods ripped apart, and a sense of community destroyed. The scar that remains from the highway intrusion is both visible and deeply felt as its impacts continue to reverberate today.

During the same time period, between the 1960's and 1980's, the area also experienced increasing White flight from north Omaha neighborhoods into outlying suburbs. This exacerbated the economic and social fallout from highway construction and diverted infrastructure investment to newer suburbs.

It further decreased property values and increased the frequency of absentee landlords holding neglected and vacant property. The Nebraska Department of Economic Recovery reported, "Construction of the North Omaha Freeway, coupled with social unrest in the 1970s, greatly impacted the North Omaha area. One neighborhood experienced a 30 percent housing loss and major increase in crime (2001)."

Figure V -43 Images of North Omaha Pre and Post Highway 75



North Omaha, 1962

The pre-highway North Omaha neighborhood structure of residential tree-lined streets can be seen in the aerial image on the left from 1962. The image on the right, from 1982, shows the partially completed highway. This long, slow separation of North Omaha is only today beginning a path toward healing.



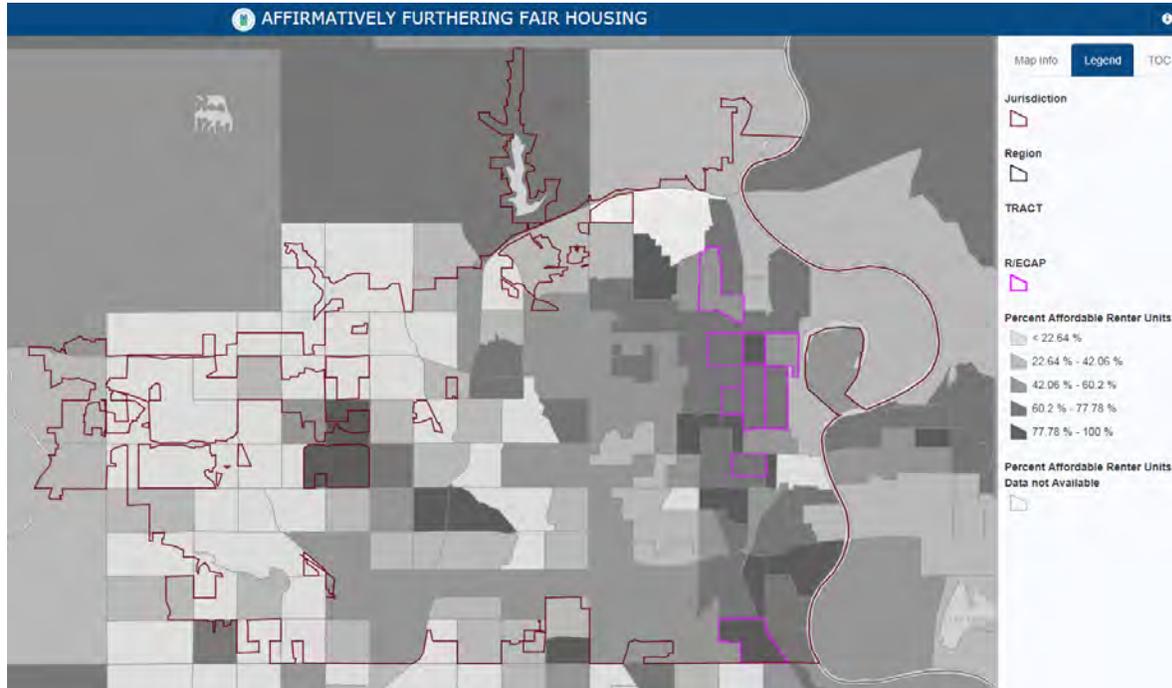
North Omaha, 1982

Rather than serving as a connector, Highway 75 North cut off and accelerated the decline of commercial corridors along 30th and 24th Streets and the remaining industrial employment in the area. Business investment and job opportunities were pulled farther away to more accessible, affluent shopping centers, office and industrial corridors. The highway is often considered one of the greatest tragedies befalling Omaha and north Omaha in particular.

The pre-highway North Omaha neighborhood structure of residential tree-lined streets can be seen in the aerial image on the left from 1962. The image on the right, from 1982, shows the partially completed highway. This long, slow separation of North Omaha is only today beginning a path toward healing.

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

Figure V -44 Omaha Rental Housing Affordability

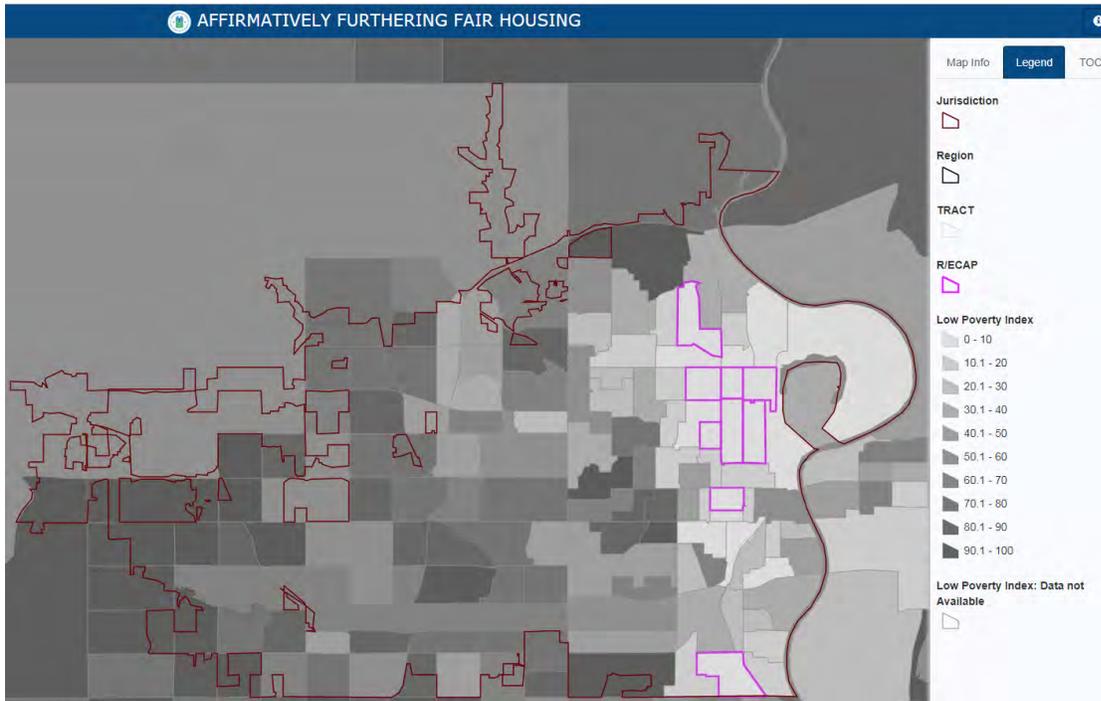


Source: HUD Map 17 Location of Affordable Rental Housing

HUD Map 17 displays housing affordability based on rental units that are affordable in terms of 30% or less for residents making 50% of the average median income (AMI). However, a large population of Omaha residents living in R/ECAP census tracts earn incomes that qualify them at extreme poverty, or 30% AMI or lower (see HUD Map 12).

Census tract 7, for example, shows has over 50% of households incomes at 30% AMI or lower. When housing affordability is considered for households lower that 50% AMI, there are little to no options for units west of 72nd Street that would qualify as affordable (less than 30% of household income) that would not be included in publicly supported housing.

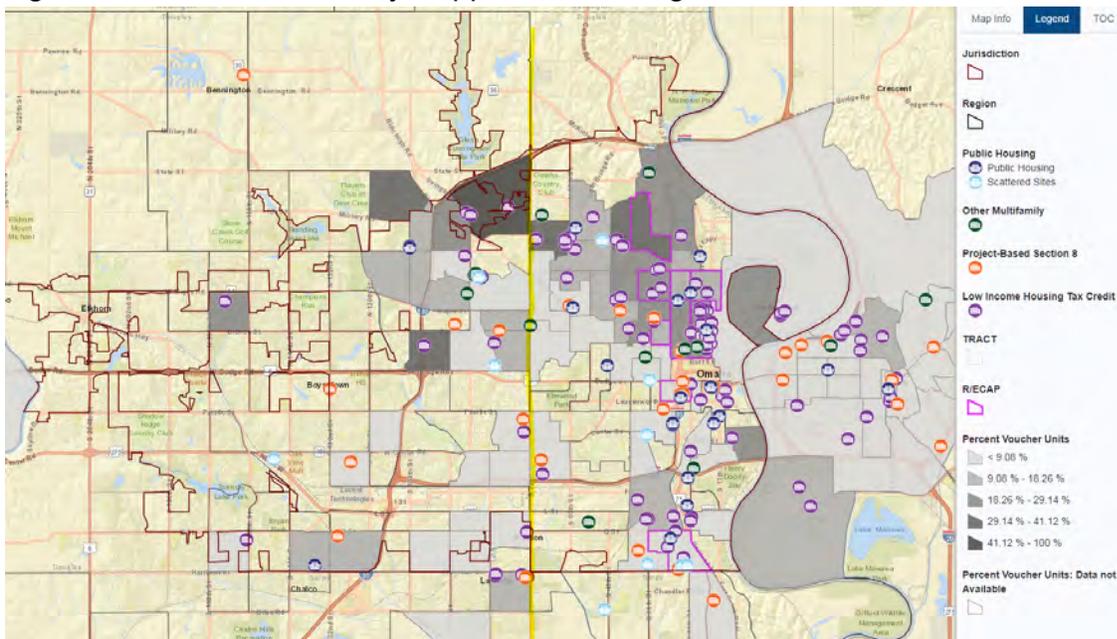
Figure V -45 Omaha Low Poverty Index



Source: HUD Map 12 Demographics and Poverty

Map 5 shows few options to reside in publicly supported housing west of 72nd Street.

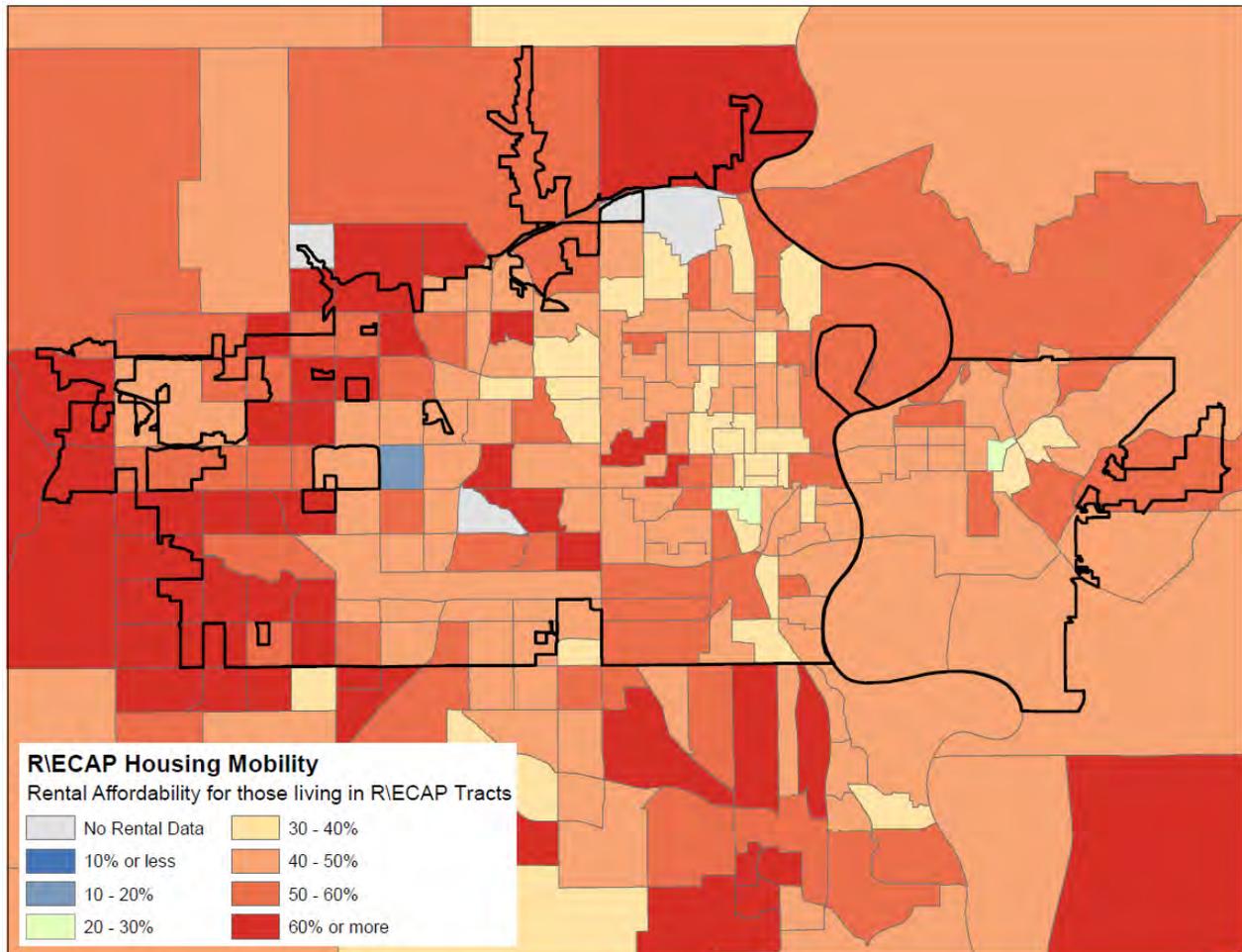
Figure V -46 Omaha Publicly Supported Housing



Source: HUD Map 5 Publicly Supported Housing (yellow line indicates 72nd St boundary)

The maps below show housing affordability at 30% or lower based on the average median income for household in the R/ECAP tracts for both renters and homeowners.

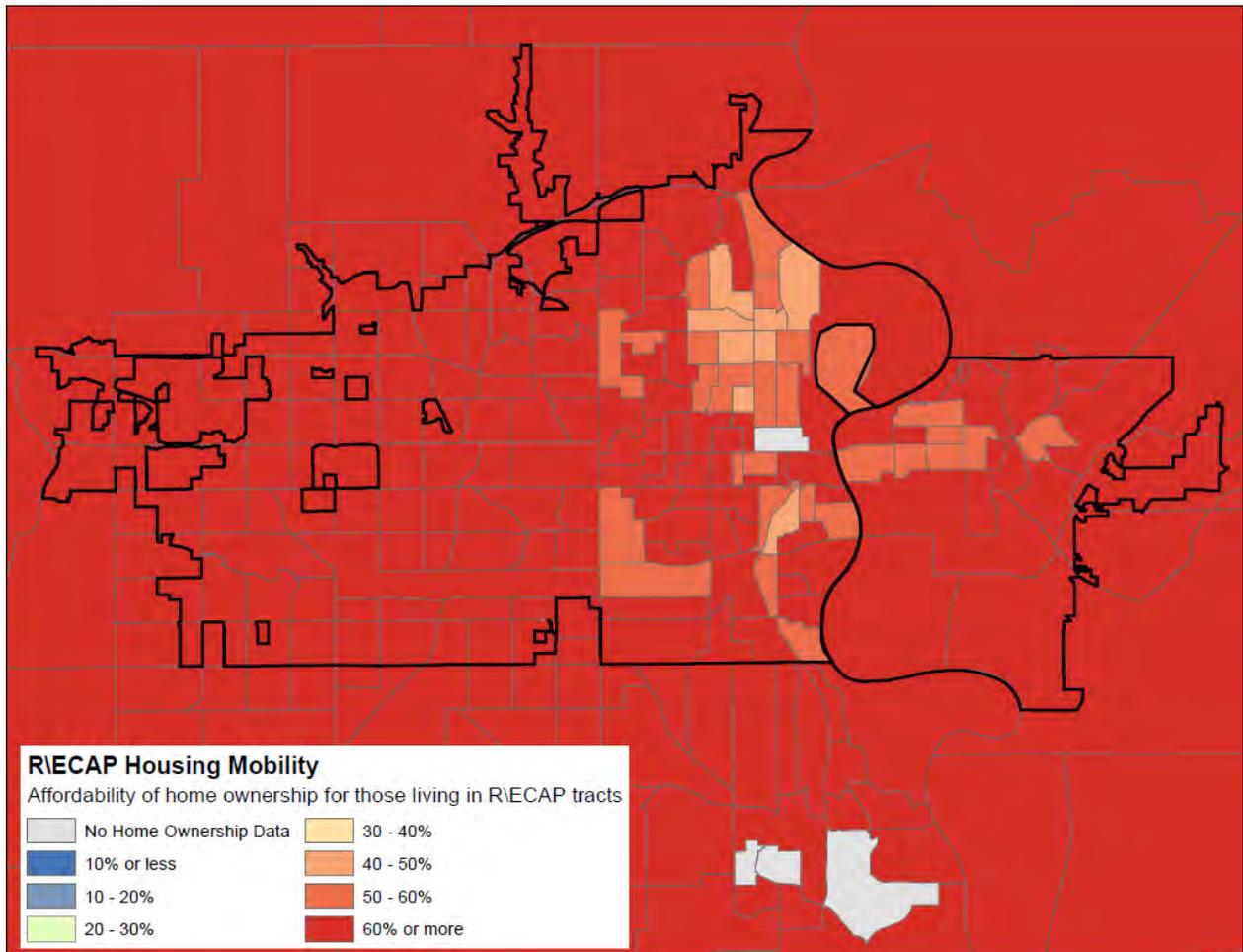
Figure V -47 R/ECAP Housing Affordability



Source: GIS Data, 2014 Census Data Affordable rental units by census tract based on R/ECAP median income

When considering the median income of R/ECAP households, there is only one census tract outside of the current R/ECAP areas, which is tract 38 with units at rental rates between 20% and 30%. Even current R/ECAP census tracts have rental rates between 30% and 50% of the average R/ECAP households. The blue/grey census tract to the east of Boystown contains very little housing because it includes a cemetery, three schools, and two parks. There are apartments and houses listed in the area for rent, with at least one apartment complex listed under project-based section 8 housing.

Figure V -48 R/ECAP Affordable Home Ownership



Source: 2014 ACS

When considering home ownership, the opportunities are even more limited for households at the average median income in R/ECAP tracts. There is not a census tract with homes listed at a range that would be considered 30% to 40% or less of the average median income for R/ECAP households. There are no options west of 72nd Street that would be under 60% of the average median R/ECAP income, and only select areas inside or outside the R/ECAPS at even 40% to 60%.

If affordable homes are either rare or not existent to rent or own outside of the R/ECAP areas it appears that the opportunity for low income persons living in R/ECAP tracts to move outside of concentrated areas of poverty is slim to none. The location and amount of affordable housing outside of R/ECAP tracts is a barrier to mobility for protected classes living in poverty within the R/ECAP areas.

3. Contributing Factors of R/ECAPs

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

OMAHA

Deteriorated and abandoned properties: Age of housing stock in R/ECAP areas is on average older than most areas of the city. Community feedback included concerns about landlords not maintaining properties in the R/ECAP areas. Low income homeowners also struggle to maintain their housing or adapt it for accessibility.

Lack of public investments in specific neighborhoods, including services or amenities
Loss of housing density in many R/ECAP areas due to deteriorating housing stock and necessary demolitions has led to a loss of services and amenities in many neighborhoods. Lack of amenities and services also means fewer jobs within areas and limited ability for the residents of the area to spend money in their own neighborhoods.

Lending discrimination: Former redlining practices limited the investment of businesses and residents in R/ECAP areas. Comparison of current R/ECAP areas and formerly redlined areas shows the impact of redlining is still present today.

Land use and zoning laws: Laws and zoning including stormwater regulations, industrial zoning close to housing, and lack of zoning incorporating commercial and residential spaces are all issues in R/ECAP communities.

Loss of Affordable Housing and displacement of residents due to economic pressures: Redevelopment of Downtown and Midtown areas has increased housing costs in areas including: Dundee, Aksarben, Benson and Blackstone Neighborhoods, Midtown Crossing area and along Park Avenue, and neighborhoods near north of Downton.

Location and type of affordable housing and lack of range of units and sizes, source of income discrimination, impediments to mobility, siting and selection policies, practices, and decisions for publicly supported housing: All of these factors contribute to the concentration of poverty in majority minority neighborhoods. Lack of affordable and public housing to the west of 72nd is a barrier to housing choice and the ability of persons currently living in R/ECAP Census tracts to move elsewhere. The concentration of affordable housing and public housing to the east of 72nd also results in refugee and new immigrant groups settling in R/ECAP tracts.

COUNCIL BLUFFS

Council Bluffs does not have any R/ECAP areas. However, the areas with some racial/ethnic concentrations are areas with more affordable housing than areas that are high income mainly inhabited by White/Non-Hispanic households. The City has seen opposition in the past to affordable housing in the several neighborhoods. Recent examples of economic discrimination are the affordable units constructed in the Sawyer Building project located in the historic 100 Block of Council Bluffs and the Gunn School/Linden Place project in the north end. Private businesses and residents opposed the project and was the subject of many debates throughout the project.

BELLEVUE

There are currently no R/ECAP areas in Bellevue.

ii. Disparities in Access to Opportunity

1. Analysis

a. Education

i. For the protected class groups HUD has provided data, describe any disparities in access to proficient schools in the jurisdiction and region.

Table V-14 Opportunity Indicators by Race/Ethnicity School Proficiency

Total population	Region	Omaha	Council Bluffs	Bellevue
White, Non-Hispanic	52.38	43.63	27.18	44.13
Black, Non-Hispanic	20.43	14.26	32.17	43.15
Hispanic	29.13	21.04	20.46	40.73
Asian or Pacific Islander, Non-Hispanic	50.15	40.93	23.39	44.87
Native American, Non-Hispanic	33.59	23.20	23.26	39.03
Population Below Federal Poverty Line				
White, Non-Hispanic	39.23	30.24	26.63	39.35
Black, Non-Hispanic	16.03	13.18	30.82	33.65
Hispanic	23.01	17.68	24.05	44.91
Asian or Pacific Islander, Non-Hispanic	35.05	31.51	7.70	42.05
Native American, Non-Hispanic	23.01	22.62	16.64	42.23

Source: HUD Table 12 Opportunity Indicators by Race/Ethnicity

HUD Table 12 ranks access to proficient schools based on the state assessment score of 4th grade student in reading and math. The index incorporates scores for up to three schools within 1.5 miles of a block group. According to HUD, “values are percentile ranked and range from 0 to 100. The higher the score, the higher the school system quality is in a neighborhood.”

When comparing opportunity indicators according to HUD Table 12 across the region Black, Non-Hispanic households have the lowest scores and White, Non-Hispanic students have the highest scores. This is true for all students and students identified as living below the federal poverty line. According to the same data, the score for Black, Non-Hispanic students in Omaha are lower than those regionally both above and below the poverty line. Index scores for all other groups of students are also lower in Omaha compared to the region.

Both Council Bluffs and Bellevue show higher school proficiency scores than those regionally for Black, Non-Hispanic students. Council Bluffs index scores are highest for Black, Non-Hispanic students living both above and below the poverty line. Scores are lowest for Hispanic students when looking at all students, but almost three times lower for students who identify as Asian-Pacific Islander when looking at those below the federal poverty line. In Bellevue, White students have the highest index scores above the poverty line but Hispanic students have the highest scores below the poverty line. Native American students have the lowest index scores above the poverty line but below the poverty line Black, Non-Hispanic students have the lowest scores.

Although the HUD school proficiency index provides data related to the distance of census tracts to proficient schools, analysis is limited because the data collected is limited to only 4th graders and only standardized test score. In order to gain a more accurate view of access to proficient schools, it would require a look at more than one factor and students at different age ranges.

OMAHA

According to HUD table 12 above, in the Omaha jurisdiction, White and Asian populations have proficiency index scores that are twice as high as the proficiency scores for Black and Hispanic students. Native Americans have a slightly higher average than Black and Hispanic students, but still almost have the proficiency index scores of White and Asian students.

For students living below the federal poverty line and within areas of concentrated poverty, the gap is even larger between White and Asian students and Black and

Hispanic students. Asian students living below the poverty line have slightly higher school proficiency index scores than White students living in poverty. Again, Native American students have slightly higher index scores than Black or Hispanic children, but still significantly lower scores than their White or Asian counterparts. Black students in the jurisdiction had the lowest proficiency scores both above and below the poverty line.

The school proficiency index is a limited measurement of assessing access to proficient education, but when comparing state test scores for all grades, gaps between White and Black students are also present. For example, when comparing Nebraska State Assessment scores in Omaha Public Schools (OPS), which has 28% students who identify as white, the overall percentage of students grades 3 through 11 who test a level considered to be proficient in English language arts is 35%. When comparing proficiency by race, only 23% of Black students were proficient compared to 55% of White students who tested at a proficient level. In Math for the same grades, 53% of all students were at a proficient level. The gap, however, was even greater, with only 37% of Black students achieving proficiency compared to 71% of White students. The gap was greatest in the area of science, with 50% proficiency across all students, but only 35% of Black students compared to 74% of White students achieving proficient scores.

Table V-15 Nebraska State Assessment, Percentage Proficiency of Students Grades 3-11

Student Population	Omaha Public Schools (OPS)			Millard Public Schools(MPS)		
	English	Math	Science	English	Math	Science
All Students	35%	53%	50%	63%	80%	80%
White	55%	71%	74%	64%	82%	84%
Black	23%	37%	35%	44%	59%	59%

Source: Nebraska Department of Education; Public Schools 2016-2017 School Year

Conversely, in primarily White school districts, Black students have higher test scores than those in primarily Non-White school districts. For example, Millard Public Schools (MPS) has 78% of students who identify as White. Black students that achieved scores considered proficient were more than 20 percentage points higher in every category than Black students at OPS. The gaps in English, Math, and Science between Black and White students at MPS still exist but are roughly 20 to 25 percentage points apart rather than a difference of 22 to 39 percentage points in OPS.

In recent years some researchers have suggested that cultural bias may influence standardized testing, giving white students an advantage over non-white students. Standardized tests should not be used to alone identify which schools are proficient, but they are a major factor measured by the state to identify school proficiency and college readiness for students.

Cultural bias may serve as one explanation for the difference in percentage of students who are proficient within schools. Additionally, poverty and language barriers may have a significant impact on both the difference in proficiency between Black and White students and the difference in test scores from one school district to another.

Table V-16 Percentage of Students Qualifying for Free/Reduced Meals and ELL Services

Specific Segment of Student Population	Statewide Average	Omaha Public School Students	Westside Public School Students	Millard Public School Students	Elkhorn Public School Students
%English Language Learners	7.28	18.43	3.15	1.81	.70
%Qualify for Free /Reduced Meal	44.65	74.24	34.99	20.91	7.56

Source: Nebraska Department of Education; Public Schools 2016-2017 School Year

When comparing Omaha Public School district (OPS), the only majority Non-White district, to other schools districts within Omaha City limits, there are significant differences in the number of students who qualify for services for English Language Learners (ELL) and those who qualify for free/reduced meals based on household income. OPS has more than double the percentage of ELL students as compared to the statewide average, and over 5, 10, and 26 times more ELL students than other school districts within the city. Considering the fact that OPS only allows ELL services for students for up to 2 years, the likelihood of an additional percentage of students who have may have additional needs in OPS is likely higher.

When comparing students who qualify for free or reduced meals across the same four districts, it is apparent that the average household income is higher for the primarily White school districts than it is for OPS. OPS has over 2, 3, and almost 10 times more students whose household incomes qualify them for free and reduced lunch as compared to Westside, Millard, and Elkhorn Public School districts. Research on the

impact of socioeconomic factors on developing communication skills, academic performance, and dropouts rates shows that in addition to affecting learning, poverty also creates psychological and physical effects that further disadvantage students in the classroom (Ooms et al., 2016).

COUNCIL BLUFFS

In Council Bluffs, access to high-performing elementary schools is consistent across the races/ethnicities except in those below the poverty line. For those below the poverty line, Asian/Pacific Islanders have the biggest disparity with an 8.92 value difference.

Students of school age in the Council Bluffs Community School District are assigned schools based on residency. However, the school district has an in-district transfer option for parents so they may choose to send their children to any school within the district. The other option available throughout the state is the ability for a parent to use the Open Enrollment option, and enroll into a school district other than the one in their area of residence. There are two middle schools and two high schools in the Council Bluffs Community School District.

The specific barrier to attendance or enrollment at a school other than the assigned school is transportation. The school district does not provide free school bus transportation to another school or district if a student is not attending the school to which they are assigned based on residency. The exception to this is if a student has an Individual Education Plan that calls for specialized transportation based on a developmental or physical disability.

The Lewis Central Community School District serves the southern and eastern-most portions of the City (Census Tracts 313 Block 2, 314, 315, 316.01, and 316.02) and has approximately 2,500 students enrolled. Starting as the school for the township, areas served within city limits include the Lake Manawa area, Twin City and Malmore Acres, Ferndale, Forest Glen/Kingsridge, and Hills of Cedar Creek. The school district has four buildings located in the district. Each building serves specific grades: Kreft Primary (pre-kindergarten to 1st grade), Titan Hill Intermediate (grades 2-5), Lewis Central Middle (grades 6-8) and Lewis Central High school (grades 9-12). Students are bussed to the school for their respective grades no matter where located within the district. This system helps combat disparities within the district. For both school districts, more than half of all students receive free or reduced lunch.

Council Bluffs is also home to Iowa School for the Deaf (ISD). ISD offers both day and boarding options and is financed primarily by the State of Iowa. There is no charge for

tuition, room, board or transportation fees to families. The school offers pre-school, kindergarten – 12 and 12+ programs for students who are deaf or hard of hearing. Residents from both Iowa and Nebraska are accepted. ISD often partners with Lewis Central High School for classes due to adjacent campuses.

BELLEVUE

According to data from HUD Table 12 (see below), the opportunity scores related to education for the City of Bellevue’s block groups. The school proficiency index is calculated based on the performance of fourth grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. Elementary schools are linked with block-groups based on attendance zones, or within district proximity matches of elementary schools which 1.5 miles of the block group.

Table V-17 Bellevue School Proficiency

Population	School Proficiency Index	
	Bellevue	Omaha-CB Region
Total Population		
White, Non-Hispanic	38.00	37.45
Black, Non-Hispanic	43.39	16.80
Hispanic	37.61	16.87
Asian or Pacific Islander, Non-Hispanic	40.21	36.35
Native American, Non-Hispanic	34.82	21.93
Population below federal poverty line		
White, Non-Hispanic	37.41	35.22
Black, Non-Hispanic	30.76	18.33
Hispanic	41.38	17.78
Asian or Pacific Islander, Non-Hispanic	42.75	33.71
Native American, Non-Hispanic	47.26	32.19

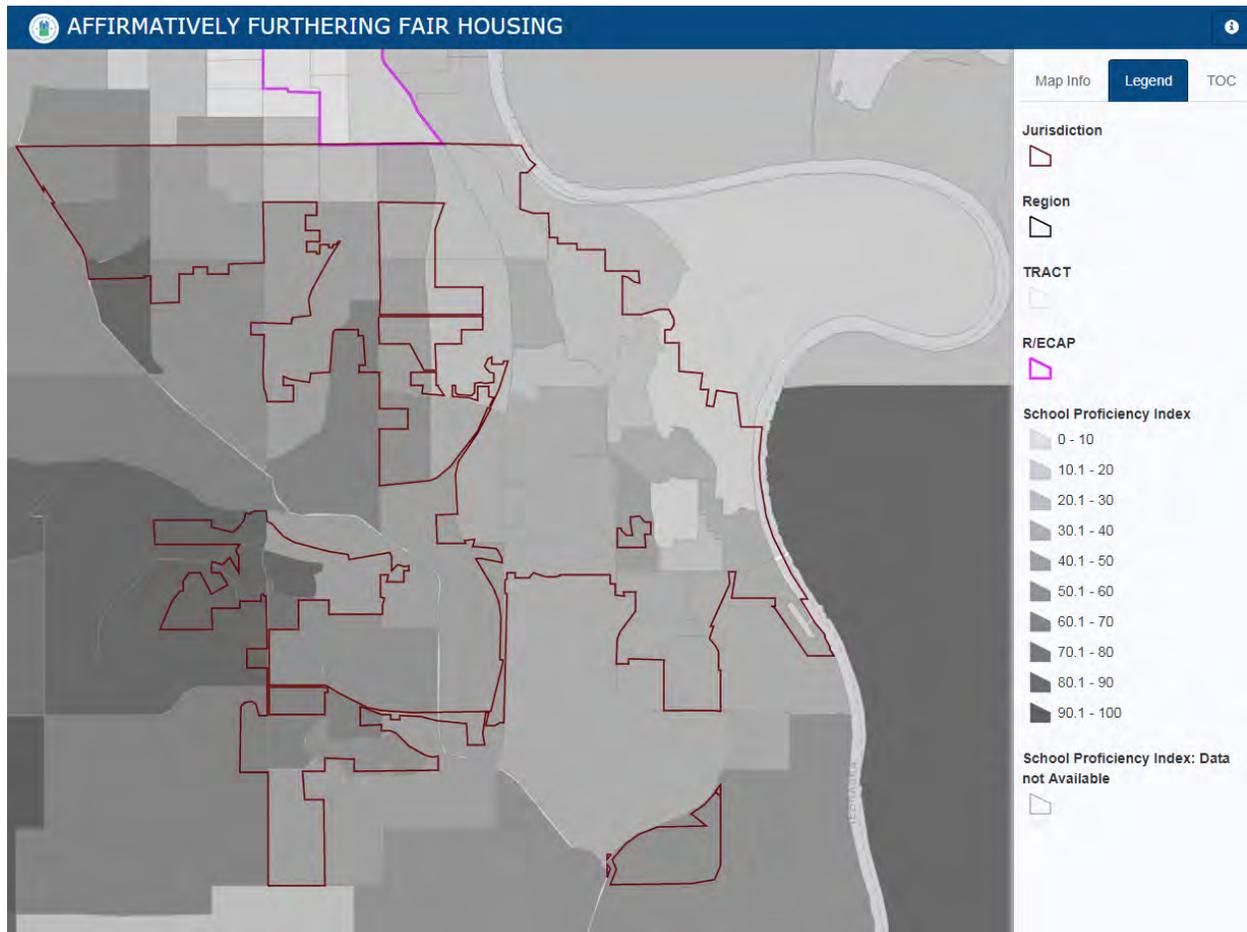
Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA

In Bellevue, the average school proficiency index value is very close for all races with a difference of only 8.57 between the highest index of 43.39 and lowest index of 34.82. This small range indicates that no particular protected class has excessively better or worse access to education. Non-Hispanic Black residents have the highest average school proficiency index value at 43.49. The lowest index value is for non-Hispanic Native American residents with 34.82.

Disparities become apparent when taking federal poverty levels into consideration. When reviewing only the population below the federal poverty line, non-Hispanic Black residents school proficiency index is 30.78, which is 12.63 below the Black total population index value. The school proficiency index number increases for non-Hispanic Native American, Asian or Pacific Islander, and Hispanic residents living below the federal poverty line.

Overall, School Proficiency indices in Bellevue are higher than the surrounding Omaha-Council Bluffs regional area.

Figure V -49 Bellevue School Proficiency



Source: HUD Map 7 School Proficiency

HUD AFFH Map 7 was utilized to view School Proficiency by census tract. The higher the indices, the higher the level of school proficiency. The highest level of school proficiency is located in southwest area of Bellevue while the lowest proficiency is located in northeast Bellevue.

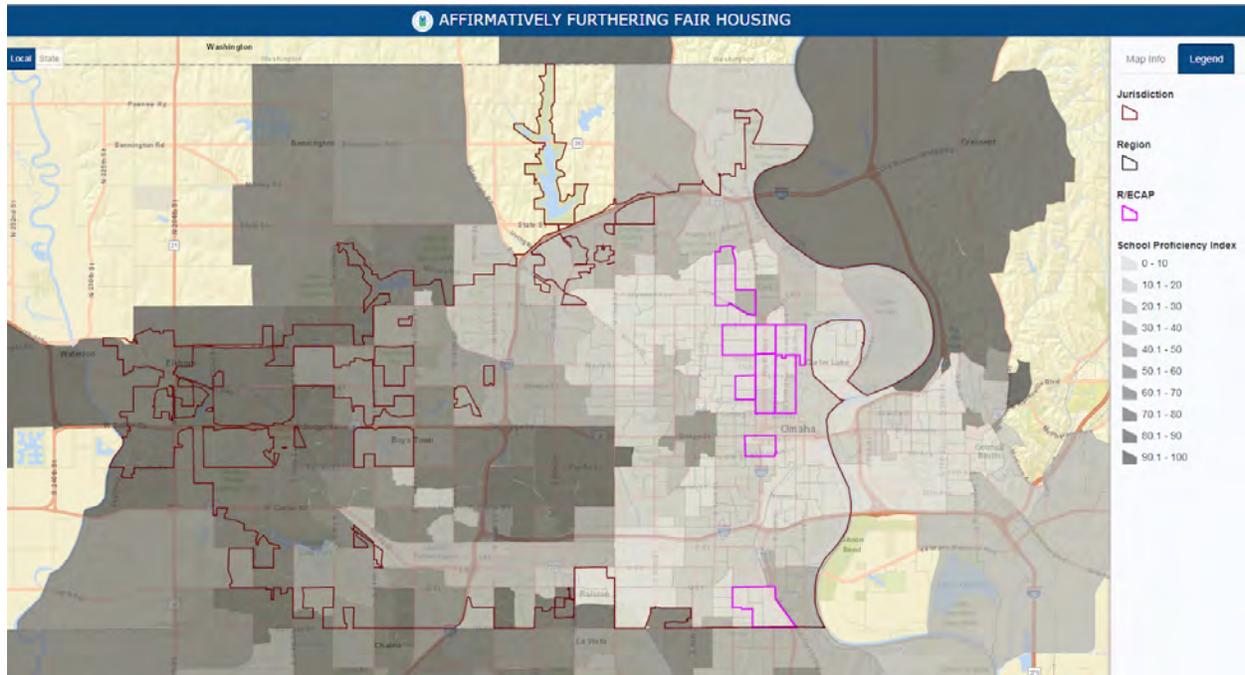
ii. For the protected class groups HUD has provided data, describe how the disparities in access to proficient schools relate to residential living patterns in the jurisdiction and region.

OMAHA

Residential living patterns play a larger role in the disparities in access to proficient schools in the Omaha jurisdiction. According to HUD Map 7 below, Demographics and School Proficiency, shows how school proficiency scores decrease moving geographically from west Omaha to east Omaha, with the lowest performing schools

locate in and around R/ECAP census tracts. These census tracts also have the highest numbers of Black and Hispanic residents.

Figure V -50 Omaha School Proficiency

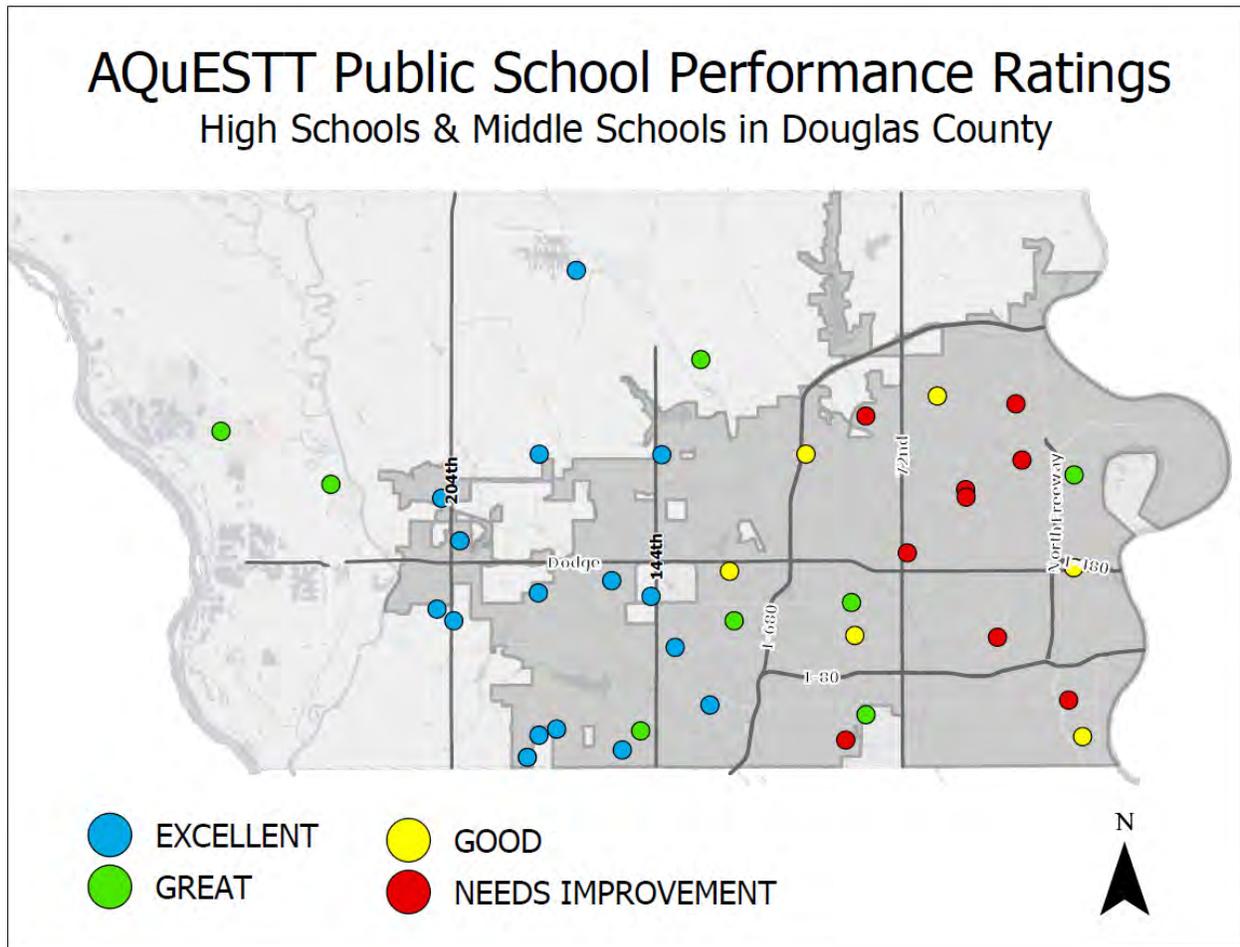


Source: HUD Map 7 School Proficiency

As previously established in section i, school proficiency rates vary between race and/or ethnicities and between school districts in the Omaha jurisdiction. In 2014 the Nebraska legislature implemented a performance system for rating schools called Accountability for a Quality Education System Today and Tomorrow (AQuESTT). The system is meant to rate a school for performance beyond just state assessment and graduation rates. See Attachment I for details on the index for AQuESTT ratings. (Source: NDE.AQuESTT@nebraska.gov)

The map below was created to reflect AQuESTT ratings for public middle schools and high schools in the Omaha area. It is again apparent that living patterns play a role in access to school proficiency.

Figure V -51 Ratings for Douglas County Public High Schools and Middle Schools



Source: GIS Data and <https://aquestt.com/>

Schools to the East of 72nd Street are categorized as either “good” or “needs improvement” with the exception of King Science Magnet Middle School, which received a rating of “great.” West of 72nd Street there are only two schools with a “needs improvement” rating. Of the 28 schools to the West of 72nd Street, 16 of those schools received an “excellent” rating and seven received a “great” rating.

The majority of schools in the Omaha Public School District (OPS) are located to the East of 72nd Street. Westside, Millard, and Elkhorn District schools are all located to the West of 72nd street. Looking further into the discrepancies between school districts within the City of Omaha, the impact of living patterns on school proficiency rates reveals the impact of segregation on access to proficient education for persons based on race and/or ethnicity.

When comparing the population of the City of Omaha with Omaha Public Schools, the district and city have very different racial dynamics. A city with a population which is 69% White contains a schools district (the largest in the city), which is 72% Non-White. This would not be possible without segregatory living patterns.

Table V-18 Public School District Demographics

Population	Omaha (City Limits)	Omaha Public School Students	Westside Public School Students	Millard Public School Students	Elkhorn Public School Students
Total	443,072	52,344	5,999	23,980	8,685
% White	69%	28%	73%	78%	88%
%Non-White, Non-Hispanic	31%	72%	27%	22%	12%

Source: Nebraska Department of Education, Public Schools 2016-2017 School Year, Population Data 2016 American Community Survey

Segregation patterns in the City can also be observed by comparing teachers in each school district. According to the Nebraska Department of Education data on teachers, Millard and Elkhorn both have over 97% teachers employed that identify as White and Westside just slightly lower at 96%. OPS data shows just under 88% of teachers identifying as White. Across the state, only 1.02% of teachers identify as Black or African American, but Westside, Millard, and Elkhorn all have less than 1% of teachers who are Black or African American. OPS, having a makeup of over 25% African American or Black students, has 4.69% of teachers identifying as African American or Black. Other interesting data sets are average tenures of teachers across schools districts, average salaries, and the percentage of teachers with Master's Degrees. Although there are some differences among tenure and salary, the greatest difference is found in the percentage of teachers with Master's degrees. Although the percentages of teachers with Master's degrees are slightly lower in OPS, it may be due to the significantly larger size of the district and number of teachers within the schools.

Table V-19 Public School Teacher Profiles

Teacher Profile	Statewide Average	Omaha Public School Students	Westside Public School Students	Millard Public School Students	Elkhorn Public School Students
Average Years Teaching Experience	14.15	11.86	11.59	14.03	12.78
Average Teaching Salary	52,534	49,881	49,694	53,137	54,045
%Teachers with Masters Degree	54.14	57.92	68.13	70.42	68.54

Source: Nebraska Department of Education Public Schools 2016-2017 School Year

As mentioned in section i, statewide assessment proficiency percentages vary between school districts within the City of Omaha. Westside, Millard, and Elkhorn districts all have averages above the statewide average in every category. Omaha Public Schools proficiency percentages are all below the statewide average.

Figure V-20 Nebraska Statewide Assessment Proficiency Percentage Scores 2016-2017

NESA	Statewide Average	Omaha Public School Students	Westside Public School Students	Millard Public School Students	Elkhorn Public School Students
English	51%	35%	59%	63%	80%
Math	72%	53%	78%	80%	95%
Science	70%	50%	76%	80%	95%

Source: Nebraska Department of Education Public Schools 2016-2017 School Year (*2017 statewide percents include students in grades 3-8 and 11th grade alternate assessment students)

COUNCIL BLUFFS

Because the local districts differ in how students are assigned schools, the HUD AFFH mapping tool does not accurately represent access to proficient schools. Map 9 identifying proficient public schools shows those in the western and northern-most portions of the city having lower access to proficient schools than the rest of the community. Additionally, it shows the southern and eastern portions as low access as well, however this is deceiving due to how the Lewis Central Community School District classifies its levels. A portion was not graded in the system creating a skew in the mapping. The City consulted with HUD Technical Assistance but because of the data query type, this was unable to be corrected. The City utilized only local data to ensure proper representation.

The Iowa Department of Education grades each public school on a variety of performance measures. The data come from multiple sources. Assessment results are received from the state's assessment vendor, Iowa Testing Programs at the University of Iowa. Graduation rates and attendance rates are reported to the Department by school districts through the Student Reporting in Iowa collection system. Lastly, staff retention data are reported by districts in the Fall Basic Educational Data Survey Staff collection. This information is added into the Iowa School Report Card database and the system assigns one of six overall ratings based on the measures: Exceptional, High-Performing, Commendable, Acceptable, Needs Improvement and Priority.

Table V-21 Iowa Department of Education School Report Cards 2016

School Name	School Type	Grades	Year Academic	Rank
Council Bluffs Community School District				
Edison Elementary School	Elementary	KG, 01, 02, 03, 04, 05	2016-2017	Needs Improvement
Hoover Elementary School	Elementary	KG, 01, 02, 03, 04, 05	2016-2017	Commendable
Carter Lake Elementary School	Elementary	KG, 01, 02, 03, 04, 05	2016-2017	Needs Improvement
Lewis & Clark Elementary School	Elementary	KG, 01, 02, 03, 04, 05	2016-2017	Acceptable
Longfellow Elementary School	Elementary	KG, 01, 02, 03, 04, 05	2016-2017	Acceptable
College View Elementary	Elementary	KG, 01, 02, 03, 04, 05	2016-2017	Acceptable
Crescent Elementary School	Elementary	KG, 01, 02, 03, 04, 05	2016-2017	Commendable
Roosevelt Elementary School	Elementary	KG, 01, 02, 03, 04, 05	2016-2017	Acceptable
Bloomer Elementary School	Elementary	KG, 01, 02, 03, 04, 05	2016-2017	Needs Improvement
Franklin Elementary School	Elementary	KG, 01, 02, 03, 04, 05	2016-2017	Acceptable
Rue Elementary School	Elementary	KG, 01, 02, 03, 04, 05	2016-2017	Acceptable
Woodrow Wilson Middle School	Middle	06, 07, 08	2016-2017	Needs Improvement
Gerald W Kim Middle School	Middle	06, 07, 08	2016-2017	Acceptable
Abraham Lincoln High School	High	09, 10, 11, 12	2016-2017	Acceptable
Thomas Jefferson High School	High	09, 10, 11, 12	2016-2017	Needs Improvement
Lewis Central Community School District				
Titan Hill Intermediate School	Elementary	02, 03, 04, 05	2016-2017	Commendable
E A Kreft Primary School	Elementary	KG, 01	2016-2017	Unable to Rate
Lewis Central Middle School	Middle	06, 07, 08	2016-2017	Acceptable
Lewis Central Senior High School	High	09, 10, 11, 12	2016-2017	Acceptable

According to the Iowa School Report Card, two of the Council Bluffs Public School District elementary schools were identified as “commendable” in the study’s 2016 findings (Crescent, Hoover). Four were identified as “acceptable” (College View, Lewis and Clark, Longfellow, and Rue) and three were identified as “needs improvement” (Bloomer, Edison, Franklin). Two elementary schools in the district are “priority” (Carter Lake and Roosevelt). The “needs improvement” and “priority” schools are located in the West End and Mid-City areas, which coincide with the highest poverty areas.

For middle schools, Woodrow Wilson was identified as “needs improvement” and Gerald W. Kirn labeled “acceptable.” Abraham Lincoln High School was labeled “acceptable” and Thomas Jefferson as “needs improvement.” Woodrow Wilson and Thomas Jefferson are both located in the West End and are populated with students from Carter Lake, Edison, Franklin, Roosevelt, and Rue which are all “needs improvement” or “priority” schools with the exception Rue.

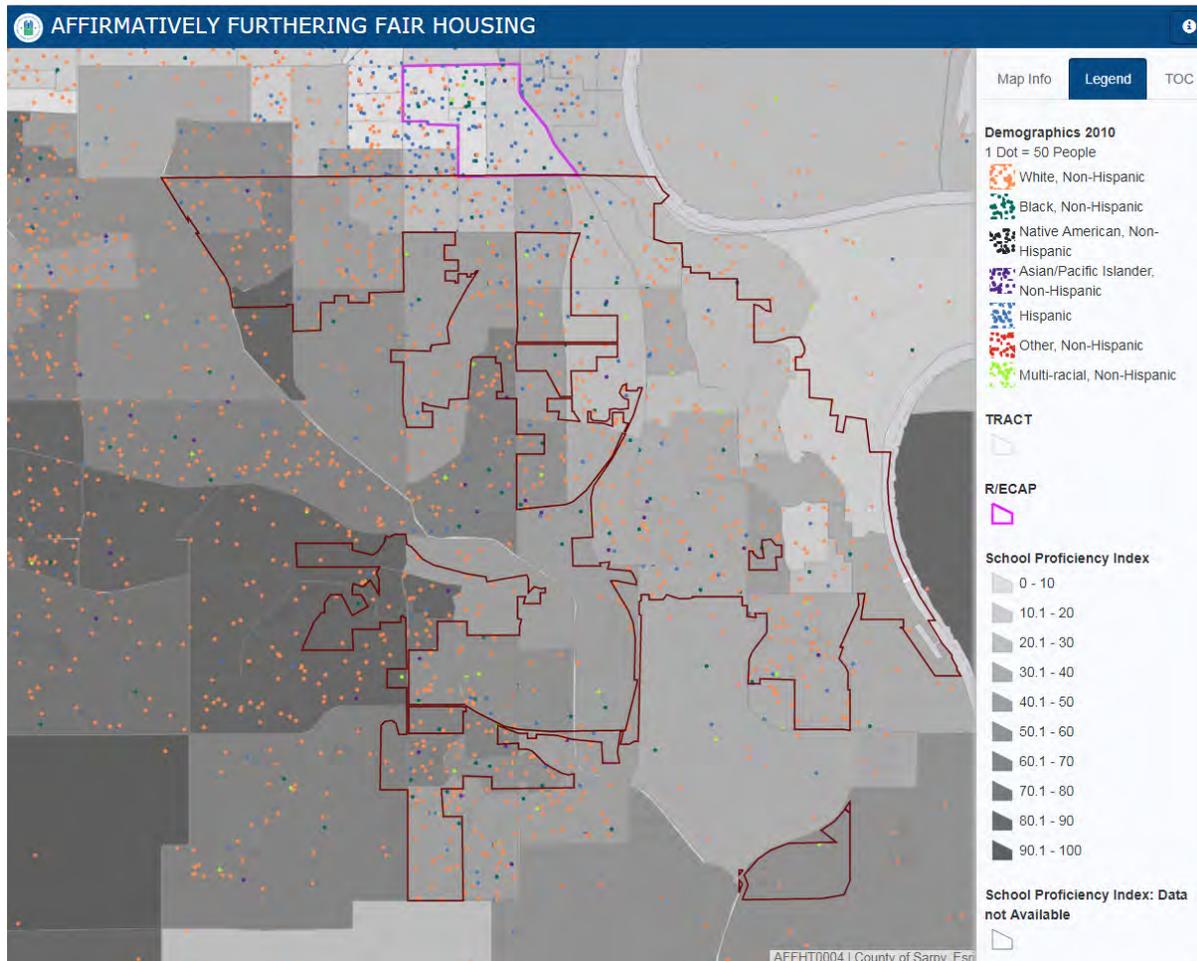
The Lewis Central Community School District is divided into primary (pre-kindergarten to 1st grade), intermediate (grades 2-5), middle (grades 6-8) and high school (grades

9-12) levels. The primary level was not rated. Both intermediate and middle school levels were identified as “acceptable” and high school as “commendable.” Attachment G includes all Iowa Department of Education School Report Cards.

BELLEVUE

HUD AFFH Map 7 shows the school proficiency index with race indicated by the dots. When looking at the Bellevue community the higher school proficiency rates can be found in the southwest area of town, which is a newer development area. This area is in the Bellevue Public school district. The lower school proficiency index rates were in northeast sections of Bellevue. A portion of the north area of Bellevue is covered by Omaha Public school district.

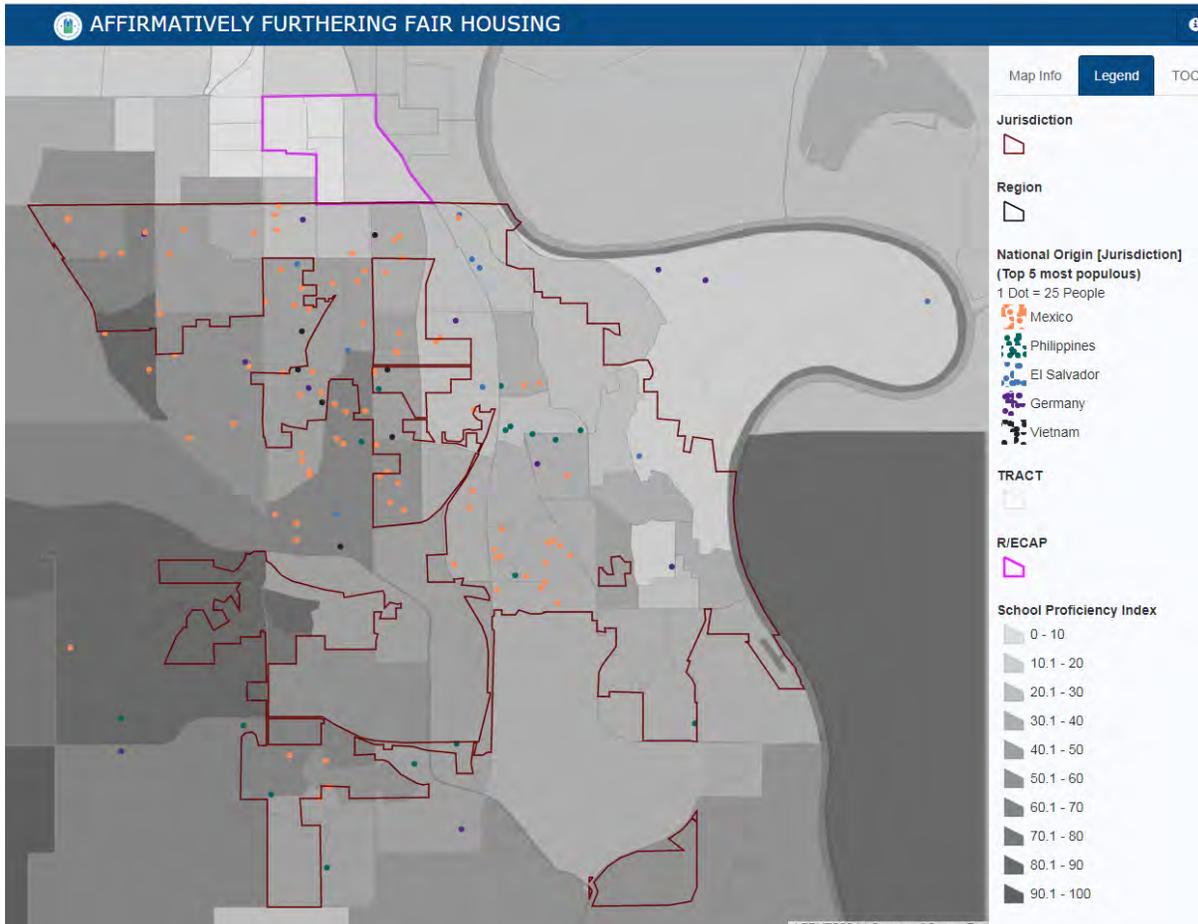
Figure V -52 Bellevue School Proficiency and Race/Ethnicity



Source: HUD Map 7 School Proficiency and Race/Ethnicity; Dot Density 1:50

The Map 7 also depicts the School Proficiency Index with an overlay of National Origin. The majority of residents with national origins outside of the United States are in areas of Bellevue with moderate school proficiency index values. Most are in areas where school proficiency index values are between 30 and 50.

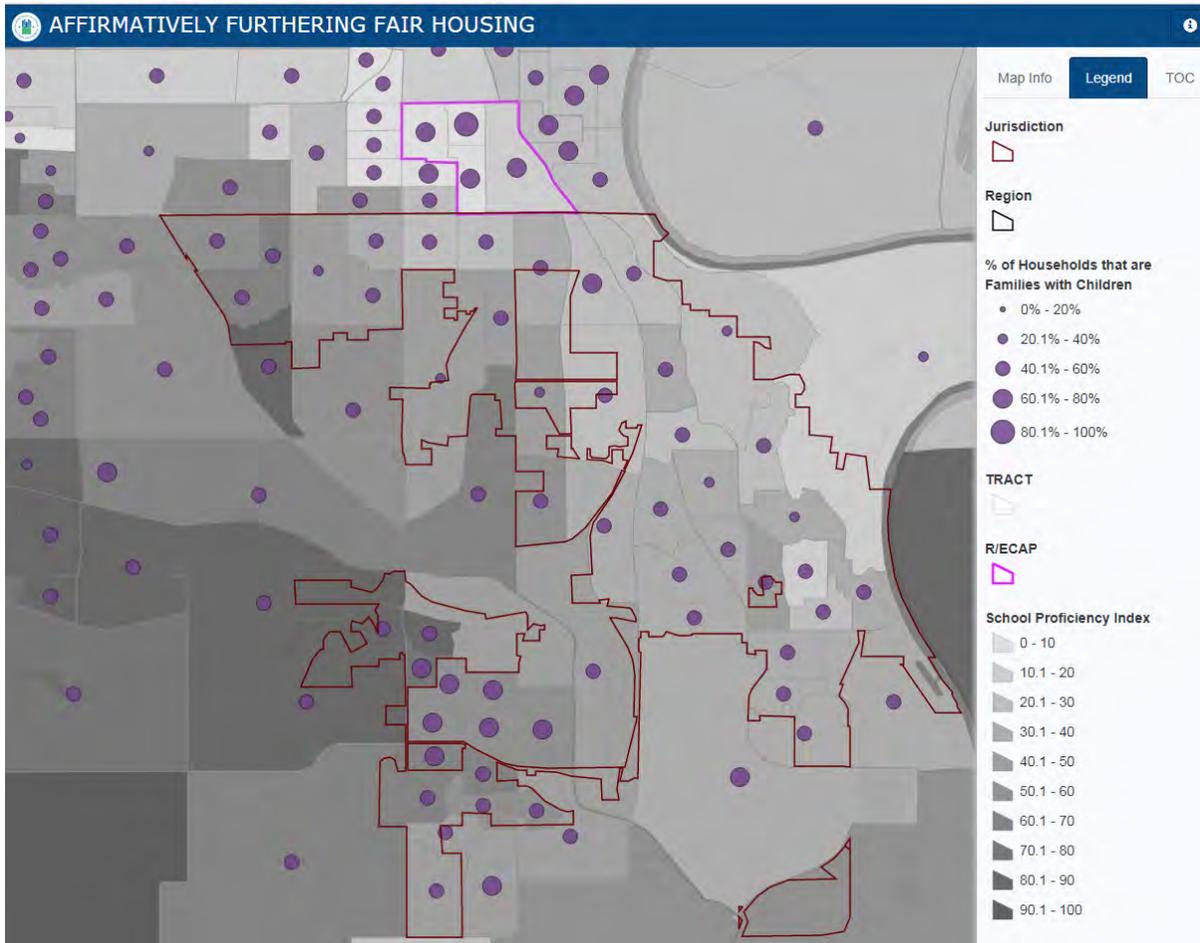
Figure V -53 Bellevue School Proficiency National Origin



Source: HUD Map 7 School Proficiency and National Origin; Dot Density 1:25

School Proficiency Index as related to Family Status shows that several block groups with high concentrations of families with children are in areas with high school proficiency. Specifically, these areas include the neighborhoods in southwest Bellevue.

Figure V -54 Bellevue School Proficiency and Family Status



Source: HUD Map 7 School Proficiency and Family Status

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss programs, policies, or funding mechanisms that affect disparities in access to proficient schools.

OMAHA

School boundaries, race/ethnicity, disparities, and funding in Douglas and Sarpy County have been a topic of debate for decades. In 1973 Omaha Public Schools, the only schools district in the City at that time, was sued for allowing and intentionally maintaining racial segregation among both students and staff. Many attempts to desegregate schools including busing children of different races to different parts of the City, experienced community opposition. In 1999 the busing policy ended and OPS returned to a neighborhood school policy.

In more recent years, the issue debated has been funding and additional resources for OPS schools with significant needs. In 2009 the Learning Community of Douglas and Sarpy County, made up of 11 school districts across two counties, was formed to ensure families across the region received access to quality education and schools had the resources necessary to support students. A shared or "common" tax levy was created to help fund Learning Community initiatives. The tax levy was heavily debated in the Nebraska District and Federal courts. In 2016 the common tax levy was removed. (Source: learningcommunityds.org) The disproportionate burden placed on OPS to serve students with financial assistance and language services remains.

The impact of poverty and the importance of early childhood development on educational disparities has become an issues many are prioritizing in Douglas and Sarpy Counties. Organizations such as Educare Nebraska, Holland's Children's Movement, Step Up to Quality, First Five Nebraska, and the Buffett Early Childhood Institute are working towards solutions to help bridge the gap for children living in or near poverty in the area. Strategies include coordinated entry programs for young mothers, comprehensive family health care and support, improving the quality of childcare and early learning centers, and other programs aimed to connect low to moderate income families with necessary resources (Source: Fawn Taylor, Executive Director of Educare Nebraska).

COUNCIL BLUFFS

The two school districts focus on student achievement. Significant intervention and attention to strengthening the classroom instruction to each of the Iowa core standards for education are the norm.

Both districts offer preschool and summer school learning programs based on need. These programs are funded by a combination of state, federal and private sources. Additionally, before and after school programs are available for parents to accommodate working schedules. These programs offer a learning-child watch combination to assist parents with care.

In addition to the public schools, Council Bluffs has three private schools:

1. St. Albert Catholic School is a Pre-K to 12th grade district with approximately 775 students. It is the sixth largest catholic school in Iowa with at 13:1 pupil/teacher ratio.
2. Heartland Christian School is a Pre-K to 12th grade district that also sponsors homeschool learning in addition to standard classroom work.
3. Liberty Christian School is a K to 12th grade district with approximately 20 students. Each student is prescribed learning materials at their own academic level. Academic level is not determined by age or school grade, but by his/her own ability as evidenced through specialized testing. Each student is then able to learn at their own rate with all teacher help being on a one-to-one basis.

Overall, the city's population has a high school graduation rate of 85.8% according to the 2016 US Census Update. In the 2017 school year, graduation rates rose to 88.42% city-wide. This almost matches the highest percent level ever reach which was 88.5% in 2015. Council Bluffs achieved a rate of 88.42% and Lewis Central a rate of 93.36% in 2017.

In 1999, Council Bluffs CSD hired its first graduation coach to combat high dropout rates. In the 2009-2010 school year, the dropout rate was 6.7%, or 178 students, which was the highest rate in a five-year period. There are now 10 graduation coaches throughout the district with significant improvement shown in reduced dropout rates. In 2016, the dropout rate dropped to 2.7%, or 71 students. Currently, eight schools in the Council Bluffs school district staff graduation coaches: Bloomer, Franklin and Roosevelt elementary schools; Thomas Jefferson and Abraham Lincoln high schools; Wilson and Kirn middle schools; and Kaneshville Alternative School. These schools coincide with the high poverty neighborhoods within the city.

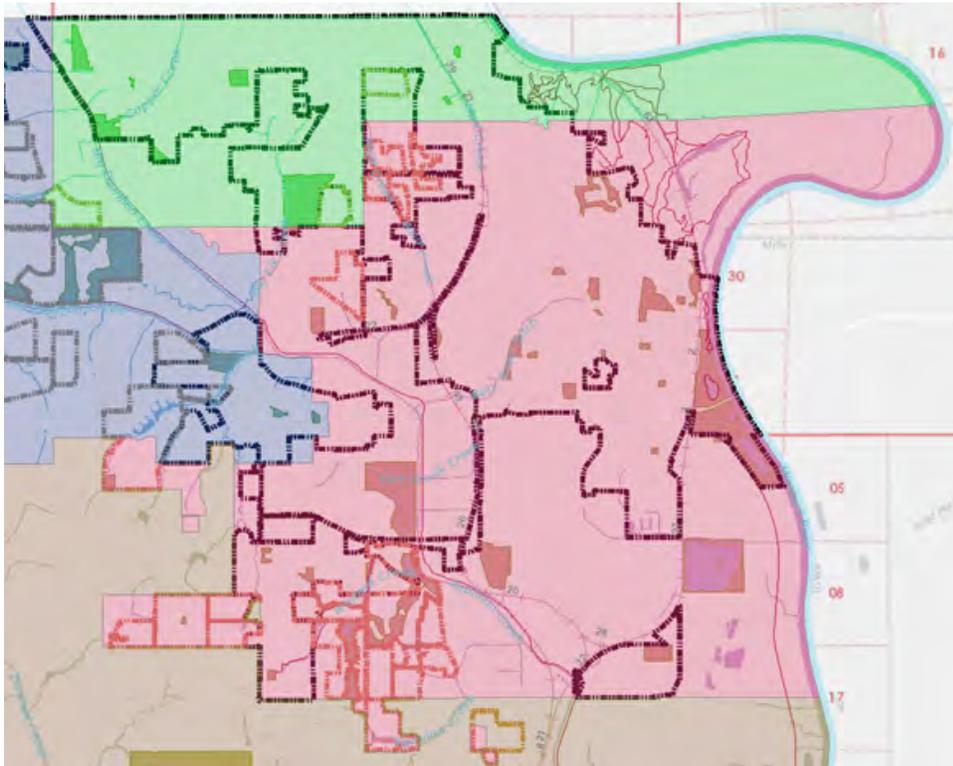
Council Bluffs Municipal Code 1.40.120 “Unfair or Discriminatory Practices – Education” states that no institution shall discriminate in education in any program or activity (see Attachment J).

BELLEVUE

According to the 2015 American Community Survey, 92 percent of Bellevue residents have is a high school graduate or higher. Of the high school graduates, 28 percent have a bachelor’s degree or higher.

The City of Bellevue city limits are served by three different school Bellevue, Papillion-La-Vista, and Omaha. In the map below, green indicates Omaha School District, pink is Bellevue School District, and blue is Papillion-La-Vista School District. The main school district is Bellevue Public School District which consist of 2 high schools, 3 middle schools, and 15 elementary schools serving slightly over 10,000 students.

Figure V -55 Bellevue School Districts



During community outreach, the overall input was that households move to Bellevue for the education opportunity provided by Bellevue Public Schools. The schools provided a

sense of community and outreach to include students, parents, and the surrounding supportive community.

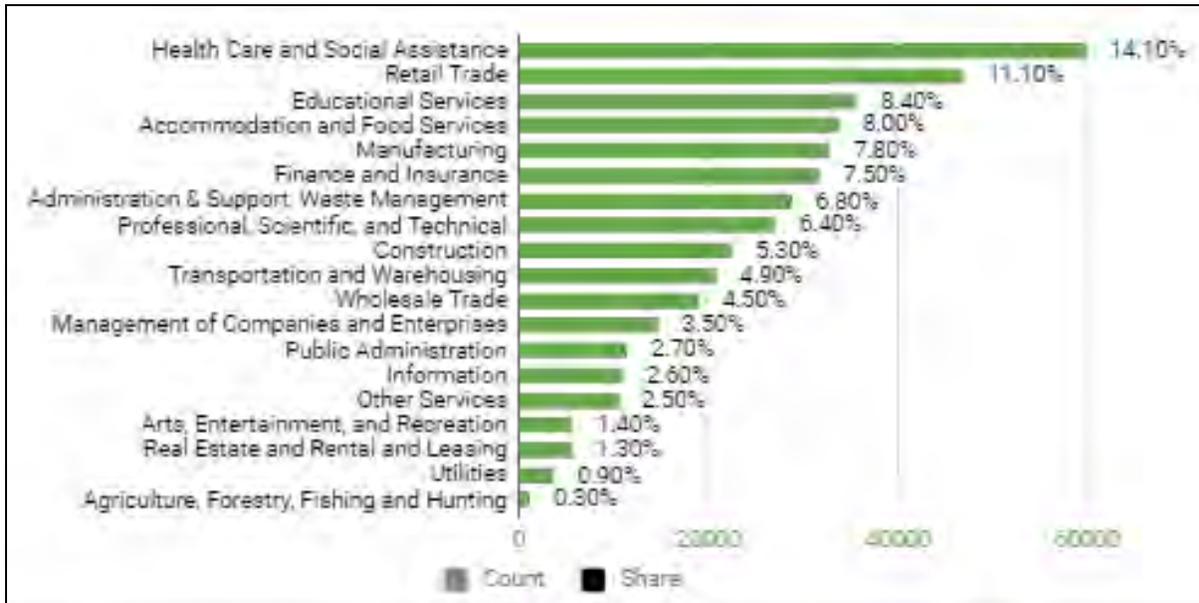
Current policies allow for “open enrollment” which allow students to request a transfer between school districts. There is no waiting list overall for transferring into Bellevue Public Schools. There are restrictions on request for specific schools; if that school is full, the student would need to request a different school within the school district.

School transportation is provided above state requirements. If a household is within four miles of a high school, two miles of a middle school, and one mile of an elementary school, transportation is not provided by the school district. If an open enrollment request is granted, transportation is the responsibility of the household. This could present barriers to transferring between school districts for some households with limited transportation options.

b. Employment

i. For the protected class groups HUD has provided data, describe any disparities in access to jobs and labor markets by protected class groups in the jurisdiction and region.

Figure V -56 Regional Employment by Industry



Source: LEHD, 2014

Regional employment is Distributed among several sectors, yet the largest sectors include healthcare and social assistance, retail trade, educational services, accomodation and food services, manufacturing, and finance and investment. Both local and HUD supplied data was combined to create the following, more detailed analysis of employment throughout the region. The employment data from Omaha, Council Bluffs and Bellevue will be compared against that of the region below.

OMAHA

Labor Markets

According to HUD, the Labor Market Engagement Index “provides a summary description of the relative intensity of the labor market engagement and human capital in neighborhoods (HUD, 2015).” Factors that contribute to the index are employment opportunities, persons participating in the labor force, and the level of education in an area, specifically persons 25 years or older who have achieved a bachelor’s degree. A higher index number is an indicator of the more participation and human capital within the census tract.

Table V-23 Comparison of Labor Market Index

	Labor Market Index			
	(Omaha, NE CDBG, ESG) Jurisdiction	(Council Bluffs, IA CDBG) Jurisdiction	(Bellevue, NE CDBG) Jurisdiction	(Omaha-Council Bluffs, NE-IA) Region
Total Population				
White, Non-Hispanic	73.64	56.09	68.68	74.72
Black, Non-Hispanic	38.03	50.33	68.59	43.98
Hispanic	43.81	45.22	66.61	51.10
Asian or Pacific Islander, Non-Hispanic	70.74	50.51	66.87	75.16
Native American, Non-Hispanic	47.52	49.07	63.42	55.77
Population below federal poverty line				
White, Non-Hispanic	61.13	50.30	61.53	62.80
Black, Non-Hispanic	32.25	60.81	55.66	35.25
Hispanic	37.33	51.89	67.58	43.21
Asian or Pacific Islander, Non-Hispanic	60.98	50.00	67.10	63.45
Native American, Non-Hispanic	46.75	52.33	62.50	48.31

Source: HUD Table 12 Opportunity Indicators by Race/Ethnicity

While every group living in Omaha shows Labor Market Index scores below the regional average, Figure V indicates that within Omaha the labor market index is highest for persons who identify as White and Asian or Pacific Islander (designated as non-Hispanic). These same groups have the lowest level of poverty within the jurisdiction, according to the low poverty index. Additionally, large disparities between individuals identifying as White and Asian, non-Hispanic and other groups exists, with those identifying as Black non-Hispanic and Hispanic scoring at least thirty points lower in the Labor Market Index for the city. These large disparities exist for populations both above and below the poverty line. Moreover, Black and Hispanic households, particularly those falling below the poverty line, living in Omaha show the lowest labor market index scores of any city with in the region.

Job Proximity

Job Proximity Index as defined by HUD is “the accessibility of a given residential neighborhood as a function of its distance to all job locations within a CBSA, with larger employment centers weighted more heavily.” The index uses a gravity model to measure access of neighborhoods to job locations and incorporating size of employer and job opportunities as well as the labor supply or competition for jobs at those locations. A higher the index number is an indicator of greater proximity to jobs within the census tract.

Table V-24 Comparison of Job Proximity Index

	Jobs Proximity Index			
	(Omaha, NE CDBG, ESG) Jurisdiction	(Council Bluffs, IA CDBG) Jurisdiction	(Bellevue, NE CDBG) Jurisdiction	(Omaha-Council Bluffs, NE-IA) Region
Total Population				
White, Non-Hispanic	52.58	49.44	40.95	51.20
Black, Non-Hispanic	47.46	50.23	49.44	47.32
Hispanic	49.83	52.93	42.04	49.60
Asian or Pacific Islander, Non-Hispanic	54.13	53.95	49.61	53.97
Native American, Non-Hispanic	53.32	52.35	39.63	52.51
Population below federal poverty line				
White, Non-Hispanic	55.49	57.68	49.16	53.87
Black, Non-Hispanic	47.33	48.90	48.32	47.32
Hispanic	50.40	52.25	42.70	49.97
Asian or Pacific Islander, Non-Hispanic	47.45	29.08	54.32	48.26
Native American, Non-Hispanic	50.29	49.67	39.73	49.63

Source: HUD Table 12 Opportunity Indicators by Race/Ethnicity

Similar to households across the region, households living in Omaha have lack luster scores on the Jobs Proximity Index. Regardless of race, ethnicity or income the Jobs Proximity Index shows less than a ten point variation for all households living within Omaha. Yet for those above the poverty line, Asian/ Pacific Islander households and Native American households show the greatest proximity to jobs, while Black households show the least proximity to jobs. For households falling below the poverty line, White households show the greatest proximity to jobs, while Black households and Asian/ Pacific Island households are shown to be the furthest from jobs. This difference in job proximity for Asian/ Pacific Island households living below the poverty line and their counterparts above the poverty line may indicate that they live in significantly different areas of the city.

COUNCIL BLUFFS

According to the Labor Market Engagement Index, in the metro area, White/Non-Hispanic have higher rate of employment, labor-force participation and population over 25 with a bachelor's degree than any other race (74.72%). When below the poverty rate, White/Non-Hispanics have a Labor Market Engagement rate of 62.80%. Black/Non-Hispanic have the lowest with 43.98% and when below the poverty level a rate of 35.25%.

In Council Bluffs, disparities in the labor market index show a clear picture of the locations of high poverty neighborhoods. The west end and mid-city neighborhoods have the lowest labor market index and the highest is located in the east end or high-end housing exists.

The job proximity map reverses the labor market index map with individuals from the east end having longer commutes than those in the west end and mid-city neighborhoods. According to the US Census, of the 30,328 over 16 years old workers 83.8% drive to work alone, 9.3% carpool, 2.3% work from home and 1.1% use public transportation. The mean travel time to work is 18.5 minutes.

BELLEVUE

Table V-25 Bellevue Job and Labor Market Engagement Indexes

Population	Jobs Proximity Index		Labor Market Engagement Index	
	Bellevue, NE	Omaha-Council Bluffs Region	Bellevue, NE	Omaha-Council Bluffs Region
Total Population				
White, Non-Hispanic	40.70	51.20	68.68	74.72
Black, Non-Hispanic	49.75	47.32	68.59	43.98
Hispanic	43.23	49.60	66.61	51.10
Asian or Pacific Islander, Non-Hispanic	51.24	53.97	66.87	75.16
Native American, Non-Hispanic	39.84	52.51	63.42	55.77
Population below federal poverty line				
White, Non-Hispanic	49.35	53.87	61.53	62.80
Black, Non-Hispanic	48.50	47.32	55.66	35.25
Hispanic	43.10	49.97	67.58	43.21
Asian or Pacific Islander, Non-Hispanic	54.91	48.26	67.10	63.45
Native American, Non-Hispanic	39.92	49.63	62.50	48.31
Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA				

According to the Job Proximity Index, compared to the total population, Asian families live closest to employment center with a 51.24 index. The White, Black and Hispanic residents are all relatively similar with 40.7, 49.75, and 43.34 respectively. Native Americans are faced with the living the furthest distance to employment centers with an index of 39.84. For the population living below the federal poverty line, White residents

live closer to than their general population counterparts with an increased index of 49.35. The remaining groups have similar job proximity to the general population counterparts.

Regional index rates shows that White, Black, and Hispanic households all have similar job proximity to their counterparts living below the poverty level with index rates fluctuating only slightly +/-2.6. The biggest difference was in Asian and Native American who saw a decrease in the population living below the poverty line from 53.97 to 48.26 and from 52.51 to 49.36 respectively. Overall, regional figures are not an improvement over Bellevue scores, which suggest that a housing location within Bellevue will likely offer residents similar access to job centers.

Bellevue's total population has relatively high labor market index values with the highest being non-Hispanic Whites with 68.68, followed closely by non-Hispanic Blacks with 68.59 and the lowest being non-Hispanic Native American with 63.42. The discrepancy increases for the population below the federal poverty line. This causes the labor market index for non-Hispanic Blacks to drop to 55.66.

Overall, Asian or Pacific Islander and Hispanic households living below the poverty line tend to have better labor force participation than the general population, while White Non-Hispanic households, Blacks and Native Americans living below the poverty line have lower labor work participation than their populations at large.

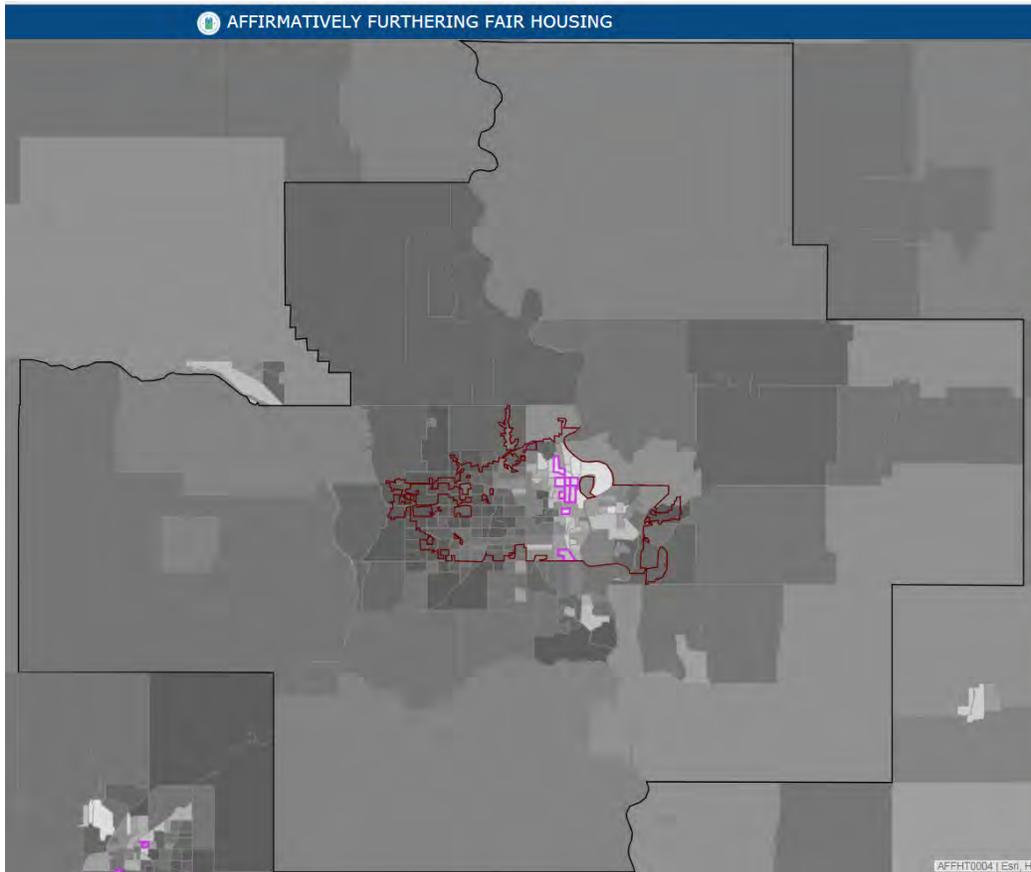
Regional index rates show that non-Hispanic White and Asian residents tend to have better labor force participation, regardless of income. The population of non-Hispanic Blacks has the lowest labor market index rates regardless of income. Overall, regional figures are not an improvement over Bellevue scores, which suggest that Bellevue has better labor force participation and human capital than the surrounding region.

Together the Jobs Proximity Index and Labor Market Engagement Index show that while the city population tends to be more engaged with the labor market both areas offer the same regarding employment proximity to neighborhoods and most residents must find transportation to employment.

ii. For the protected class groups HUD has provided data, describe how disparities in access to employment relate to residential living patterns in the jurisdiction and region.

Labor Market Index

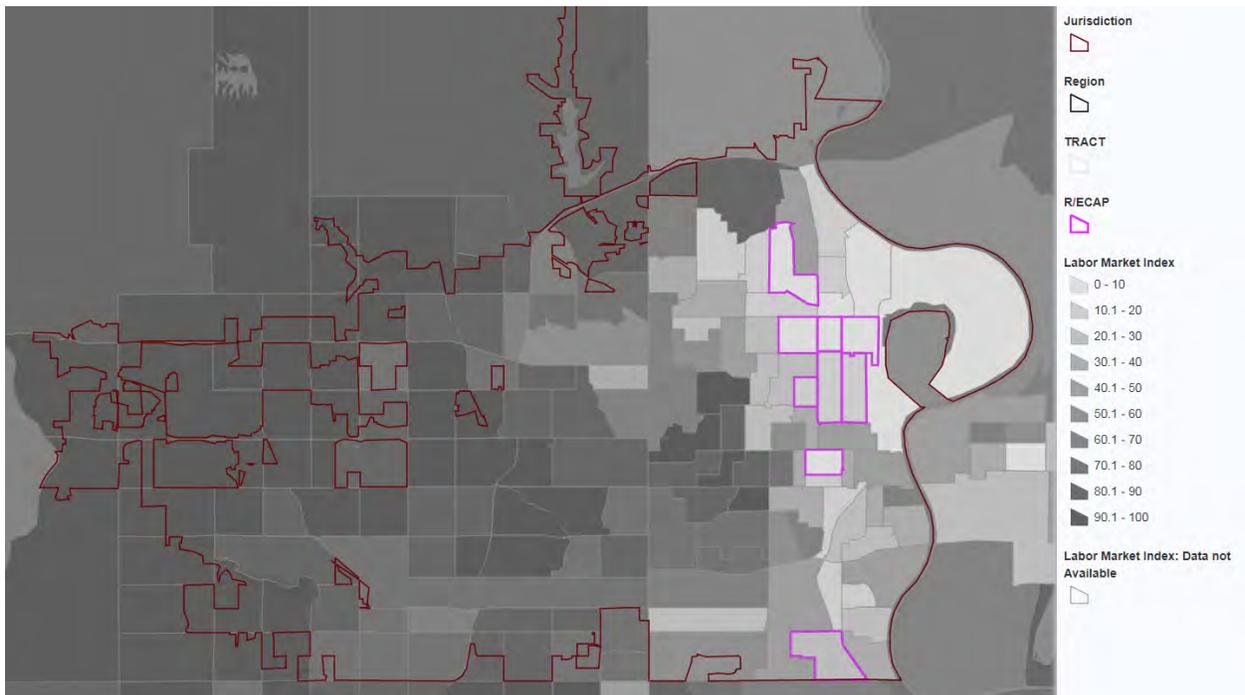
Figure V -57 Regional Labor Market Index



Source: HUD Map 9 Labor Market; A view of the regional labor market index.

OMAHA

Figure V -58 Omaha Labor Market Index

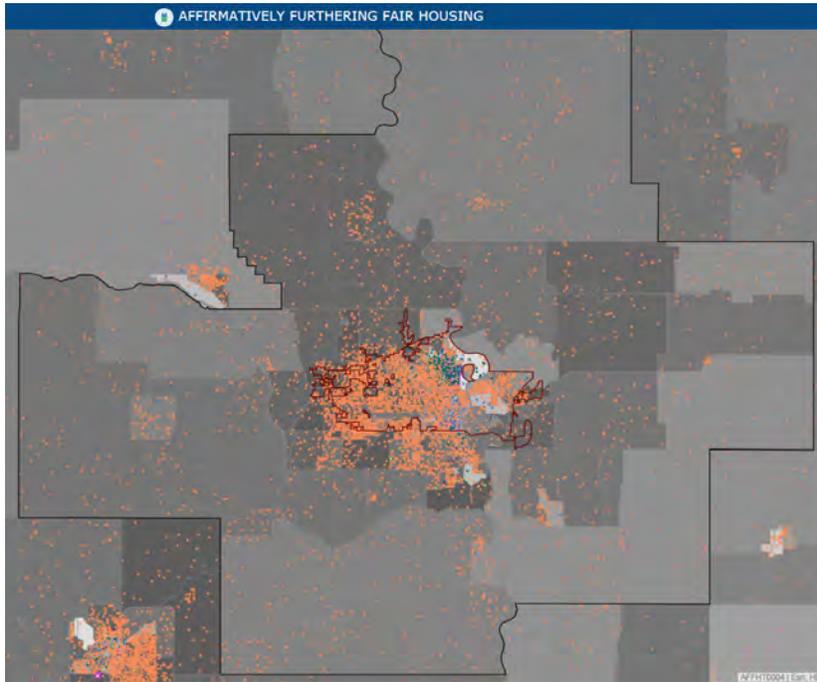


Source: HUD Map 9 Labor Market; Labor market index data for the Omaha area. Census tract codes with lower labor market index numbers are lighter and color, and as those numbers increase, the shade of grey becomes darker.

Comparison of the labor market index between the City of Omaha and the Region show that the lowest labor market index numbers are located on the far eastern portion of Omaha, along the border of Nebraska and Iowa. All R/ECAPS tracts in the region are also found within Omaha's jurisdiction along the far eastern portion of the City. The lowest Labor Index score in the jurisdiction falls within a R/ECAP tract and has a score of 4, while the majority of R/ECAP tracts have labor market index scores under 20.

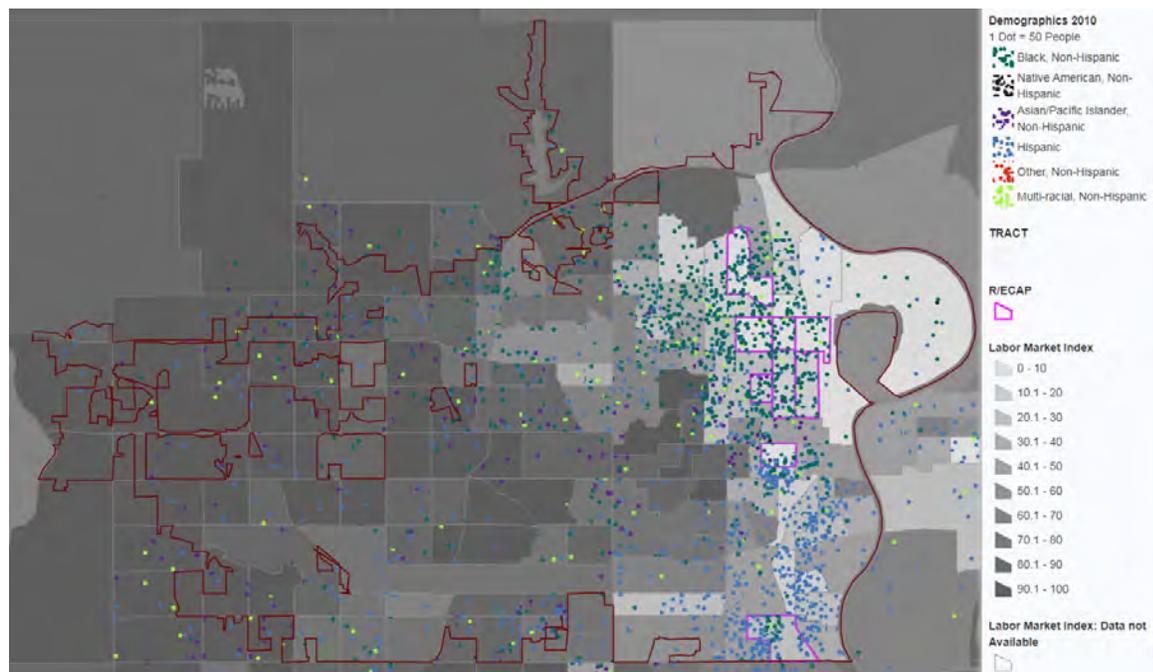
Race/Ethnicity Labor Market

Figure V -59 Regional Labor Market Index



Source: HUD Map 9 Demographics and Labor Market Index

Figure V -60 Omaha Race/Ethnicity Labor Market Index

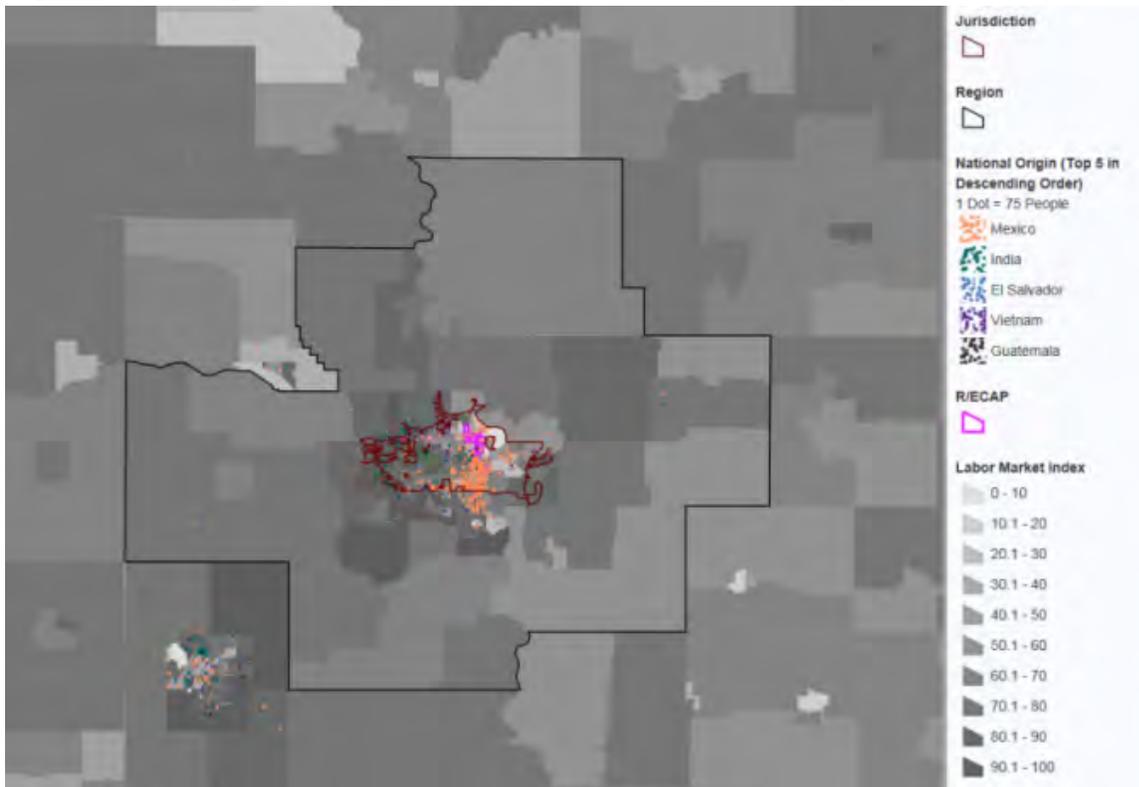


Source: HUD Map 9 Labor Market, White Population Removed, Dot Density 1:50

According to the Map 9 above, R/ECAP tracts and groups other than those who identify as White or Asian, non-Hispanic are concentrated within the eastern portion of Omaha's jurisdiction. A majority of the population living in R/ECAP areas is made up of a people identifying as Black, non-Hispanic, while areas in the southeastern part of the City has a large population identifying as Hispanic.

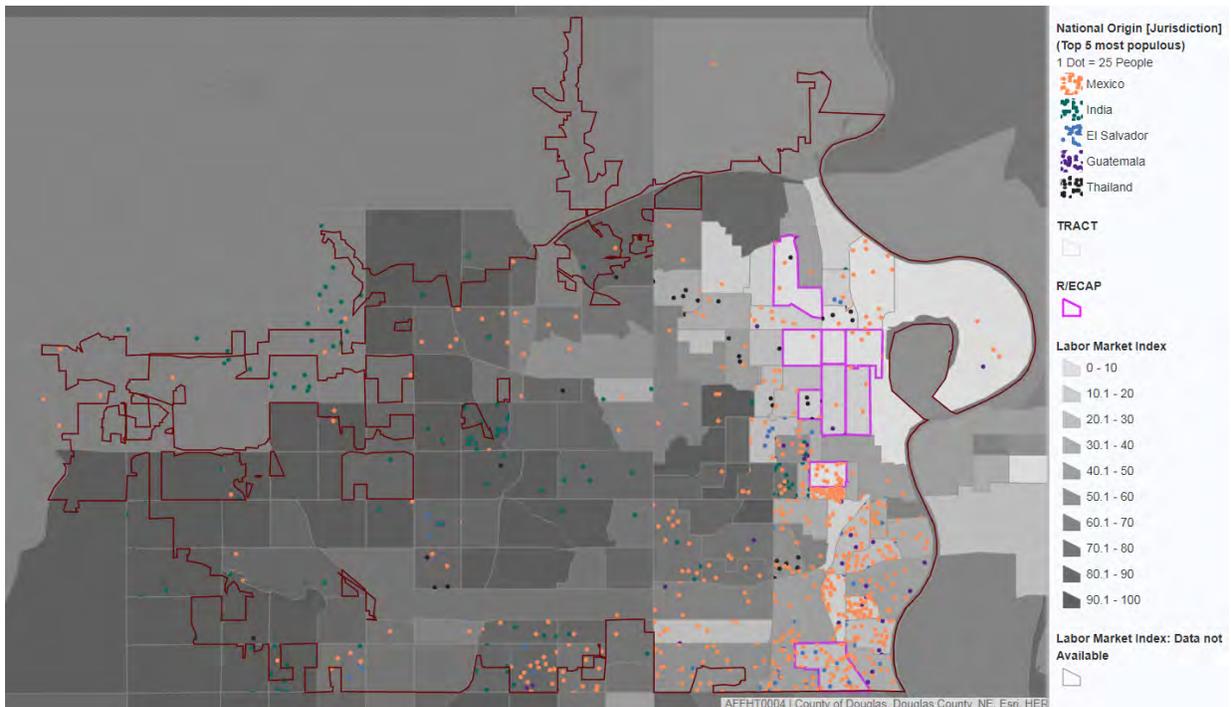
National Origin and the Labor Market

Figure V -61 Regional Labor Market Index and National Origin



Source: HUD Map 9 Labor Market Index

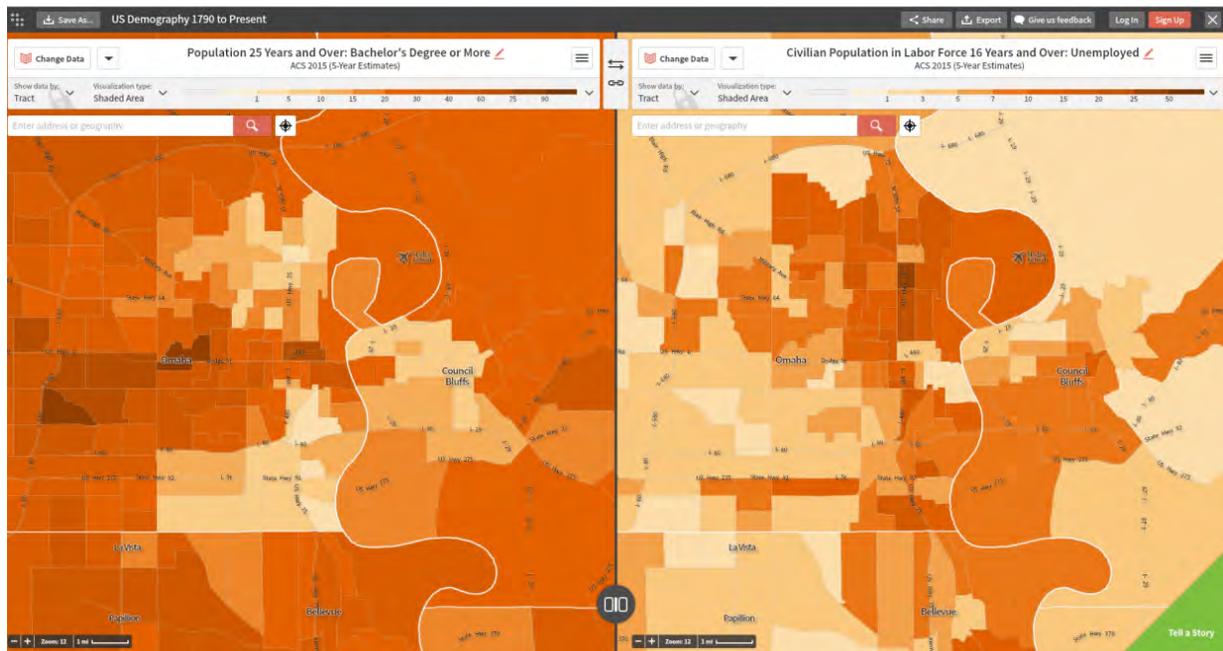
Figure V -62 Omaha Labor Market Index and National Origin



Source: HUD Map 9 Labor Market, Dot Density 1:25

Additionally, when comparing the the City of Omaha to the greater region, higher levels of foreign-born persons are also more concentrated in the eastern portion of the City, along the Iowa and Nebraska border. According to AFFH Table 1 and HUD Map 2, the largest population within the jurisdiction and the region of foreign-born persons identify, Mexico as their national origin. Maps of the jurisdiction show the highest concentrations of foreign-born persons in the eastern and southeastern portion of the jurisdiction. Again, the labor market indexes in these areas are lower than the surrounding areas, especially compared to those western parts of the jurisdiction and areas outside of the jurisdiction, except for portions of Council Bluffs. Within Omaha the areas with the lowest labor market indexes also have the highest populations of protected classes.

Figure V-63 Comparison of Education and Unemployment

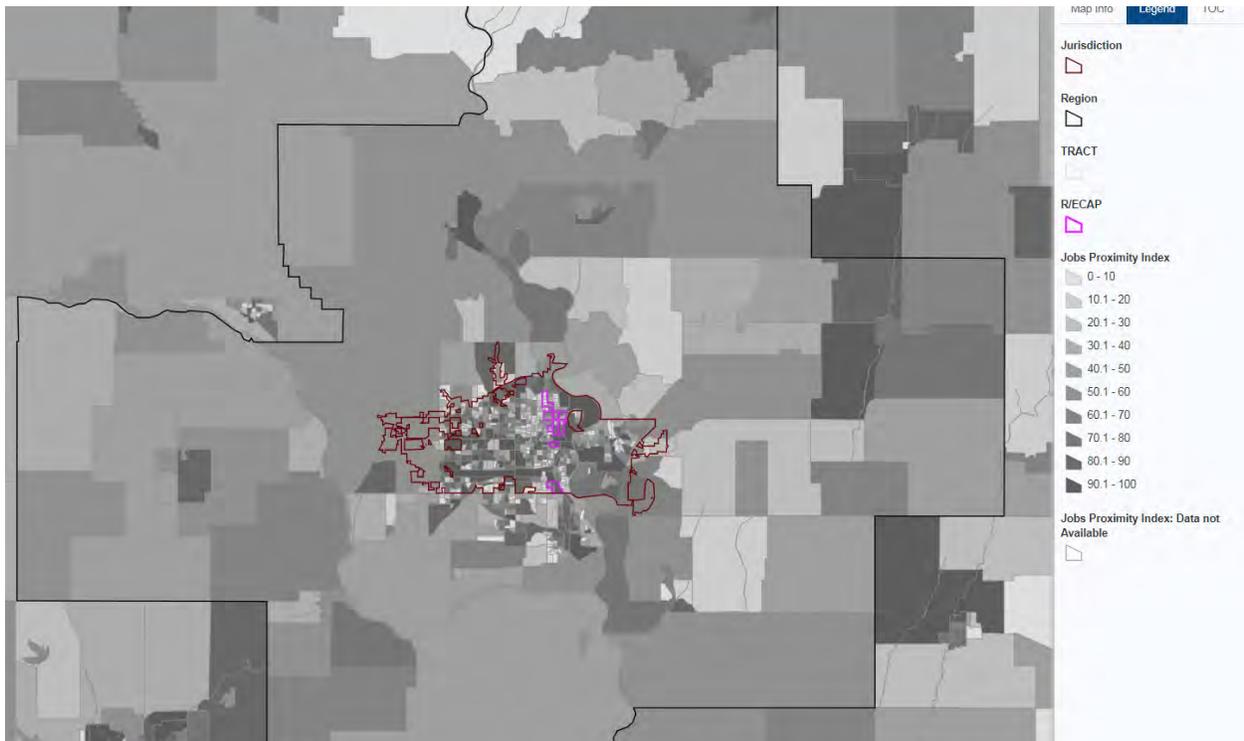


Source: Social Explorer (On left population 25yr+ with a Bachelor's degree or higher; on right population 16yrs+ population unemployed)

Moreover, if a portion of the labor market index is measured by how many persons in an area have a bachelor's degree, it is important to consider the overall educational achievement in a neighborhood. The maps above are based on data from the American Community Survey (ACS) 5 year survey. This survey produces information from 60 months of US Census data for social, economic, housing, and demographic issues. Areas to the far northeast and southeast of Omaha show lower levels of education and higher levels of unemployment. Both factors impact the labor market index and overall "human capital" in an area. These maps along with the Labor Market Index indicate that areas with low educational attainment correlate with reduced engagement in the workforce and households who live within these areas face subpar educational opportunities which in turn narrow employment opportunities.

Job Proximity Index

Figure V -64 Regional Job Proximity Index

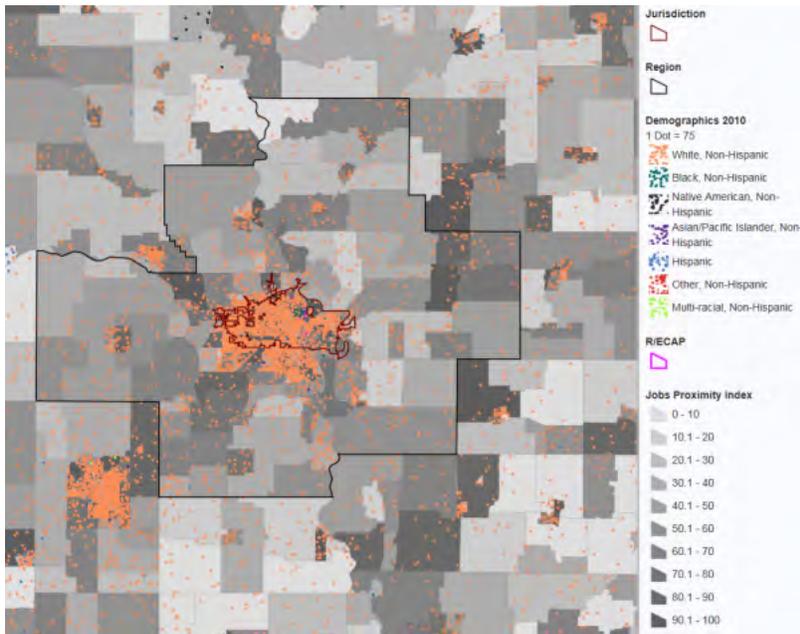


Source: HUD Map 8 Job Proximity; The map above provides a view of the regional job proximity index. Census tracts with lower job proximity index numbers are lighter in color, and as those numbers increase, the shade of grey becomes darker.

At both the regional level and individually at jurisdictional level, scores on the Job Proximity Index are mediocre at best, regardless of race or jurisdiction there were no scores at or above 60. The census tracts within Omaha and directly outside of the jurisdiction have a large range of job proximity index ratings, yet both the highest and lowest job proximity ratings are found within Omaha. Within Omaha, areas with lower job proximity scores can generally be found dispersed along the western, southwestern, and southeastern edges of the city. However, the most noticeable concentration of lower job proximity scores appear in a large area located in the northeast quarter of the City.

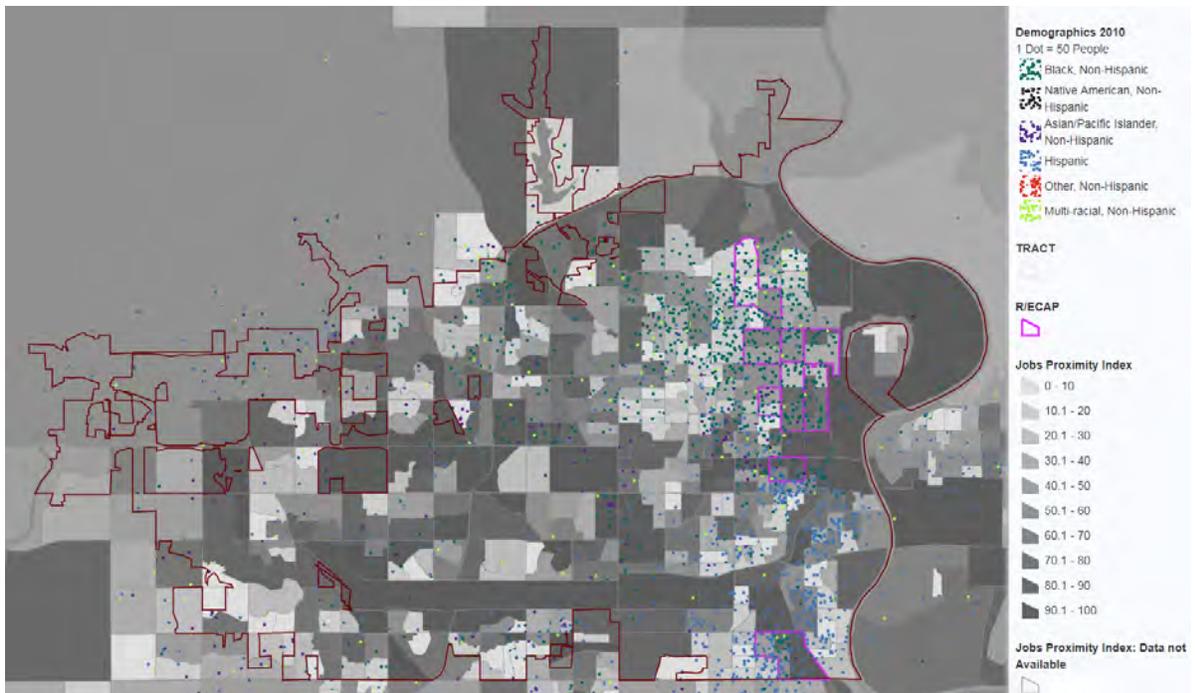
Race and Ethnicity

Figure V -65 Race/Ethnicity and Regional Job Proximity



Source: HUD Map 8 Job Proximity

Figure V -66 Race/Ethnicity and Omaha Job Proximity



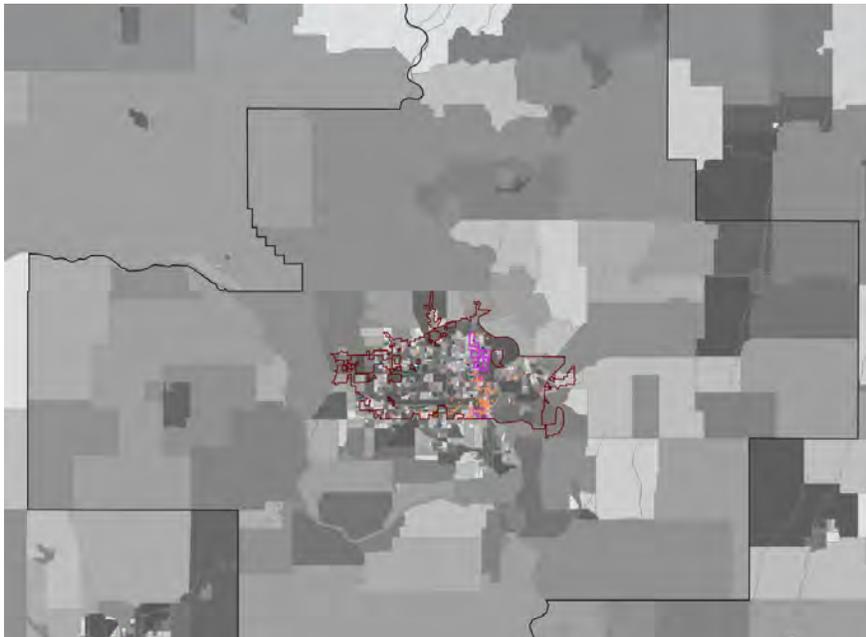
Source: HUD Map 8 Job Proximity, White Demographic Removed, Dot Density 1:50

When the location of Racial and Ethnic households are compared to areas of high and low job proximity, we find that while all household types live in areas of both high and low job proximity, there are noticeable correlations between household type and distance to regional employment opportunities.

White households living along the northwestern and southwestern edges of the jurisdiction are more likely to experience lower job proximity, while some concentrations of Hispanic households in the southeastern corner of the city are also exposed to areas of low job proximity. Notably, in the contiguous area of low job proximity located in the northeastern quarter of the city, while inhabited by a mix of household types, there is a very noticeable overlap of concentrations of Black households and several R/ECAP tracts. This may explain why the Job Proximity Index showed very little variation in scores for Black households living above and below the poverty line—they often live in close proximity and experience lower proximity to regional employment. This contiguous area of low proximity to employment could be seen as a bubble within a city otherwise teeming with employment, and as a consequence households living in this area likely face longer commute times, and greater transportation related expenses.

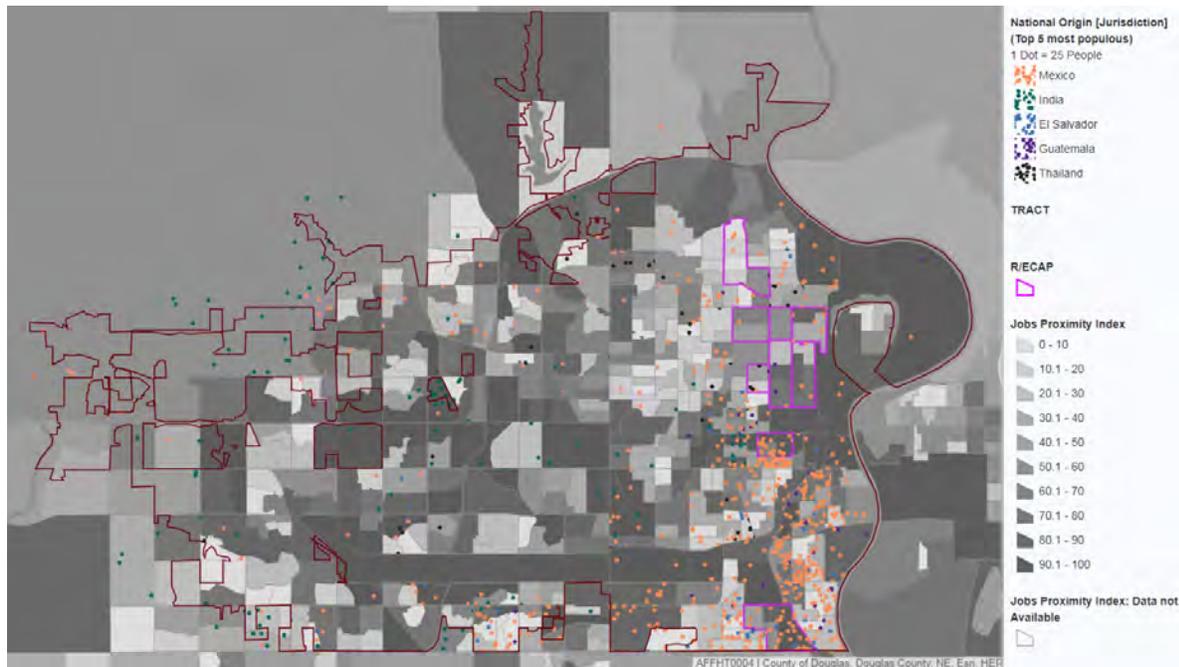
National Origin

Figure V -67 NE-IA Region National Origin and Job Proximity



Source: HUD Map 8 Job Proximity

Figure V-68 Omaha Council Bluffs National Origin and Job Proximity

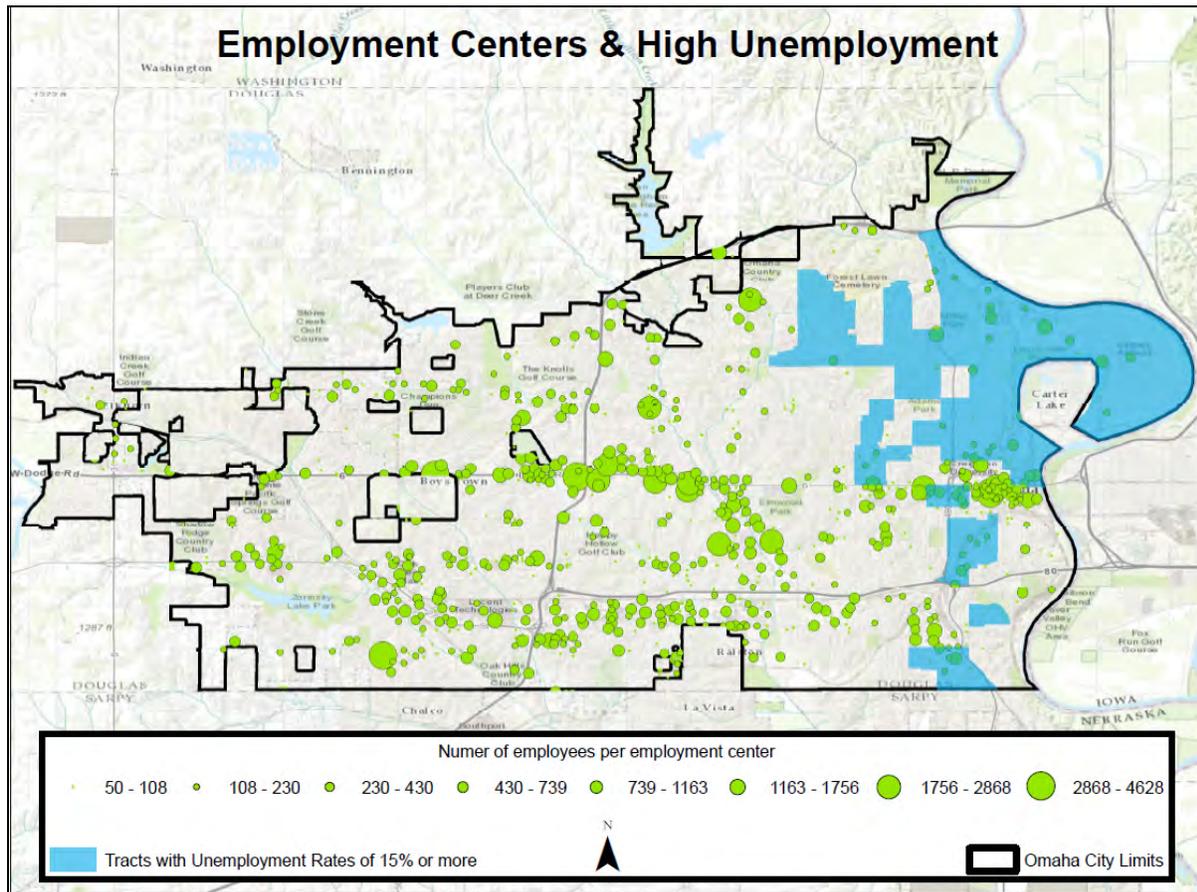


Source: HUD Map 8 Job Proximity

Comparison of jurisdiction and regional job proximity does not show a significant trend for foreign born households. However, the job proximity index does not show the types of jobs available in each Census tract.

Although the majority of foreign-born persons within both the jurisdiction and the R/ECAP are from Mexico, the job proximity index varies in the census tracts within the jurisdiction. Areas with both high and low job proximity index have concentrations of persons from Mexico and other national origins.

Figure V -69 Omaha Employment Centers & Census Tracts with High Unemployment



Source: ACS 2014

Although HUD Map 8 and Table 12 Job Proximity Index shows little difference in job proximity throughout Census tracts and between race/ethnicity across Omaha, the index does not take into account the number of jobs available. The map above focuses on the number of employees per employment center and their location to Census tracts with 15% unemployment or higher. The employment centers listed all have fifty employees or more.

Although there are some large employment centers in Downtown Omaha and a few in the southeastern portion of the city, the majority of employment opportunities appear to be along the Dodge Street corridor and in Southwest Omaha. There are very few employers with more than 50 employees in Northeast Omaha. Conversely, the majority of Census tracts with high unemployment rates are located in Northeast Omaha. The areas with the highest unemployment also have large numbers of minority households, which suggests that the location of larger employers is impacting protected classes.

COUNCIL BLUFFS

The Labor Engagement Map for Council Bluffs shows the areas with the highest availability for labor engagement in US Census Tracts 301, 309, 311, 313 and 315. These areas coincide with the City's main business park areas and schools. Unfortunately, the areas adjacent to the business parks have low residential usage and few residents. However, Council Bluffs and the Metro overall, is small enough that the average commute time is 18.6 minutes. This accounts for 43.1% of the population that work in a different state of residence—typically Nebraska.

According to the US Census, industries with the highest number of employees include educational services, and health care and social assistance (22.8%); retail trade (13.3%); and manufacturing (11.7%).

Figure V -70 Council Bluffs Jobs Proximity Index

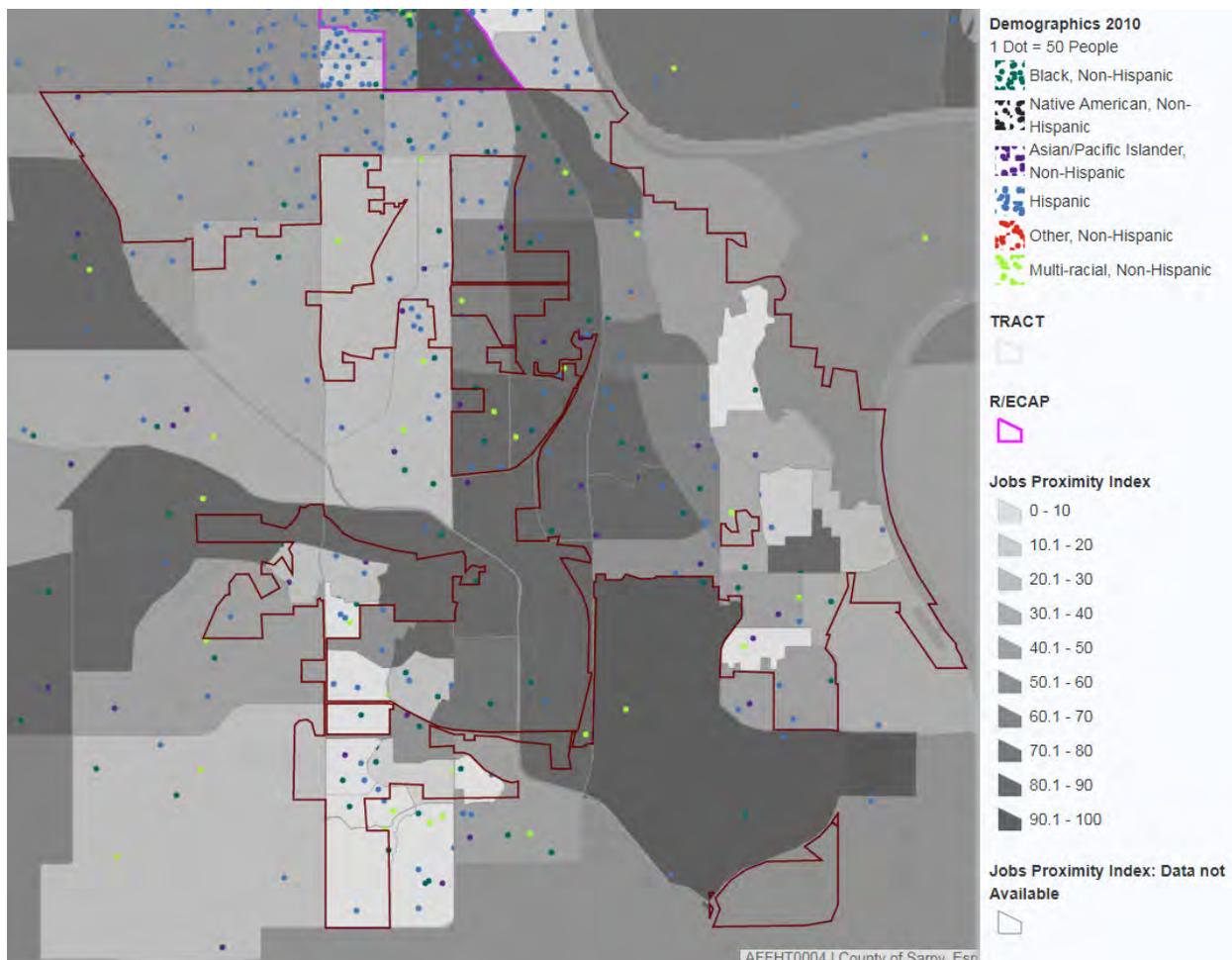


Source: HUD Map 8 Job Proximity

BELLEVUE

As previously noted, most Bellevue has job proximity indexes of 40 to 50. The job proximity for household along the transportation and commercial corridors of Highway 75 which is the major thoroughfare into the Omaha metro area and State Highway 370 which runs east to west and leads to Offutt Air Force Base shows to be slightly higher than the surrounding area. HUD Map 8 shows the job proximity by race/ethnicity. The areas in northern Bellevue are located further from major employers and therefore have lower job proximity. These areas are also further away from public transportation routes.

Figure V-71 Bellevue Job Proximity and Race/Ethnicity



Source: Map 8 Job Proximity, White Demographic Removed, Dot Density 1:50

Offutt Air Force Base plays a huge part in the city's employment numbers in addition to housing opportunities for those serving in the armed services which is indicated by the high job proximity indexes closer to the base.

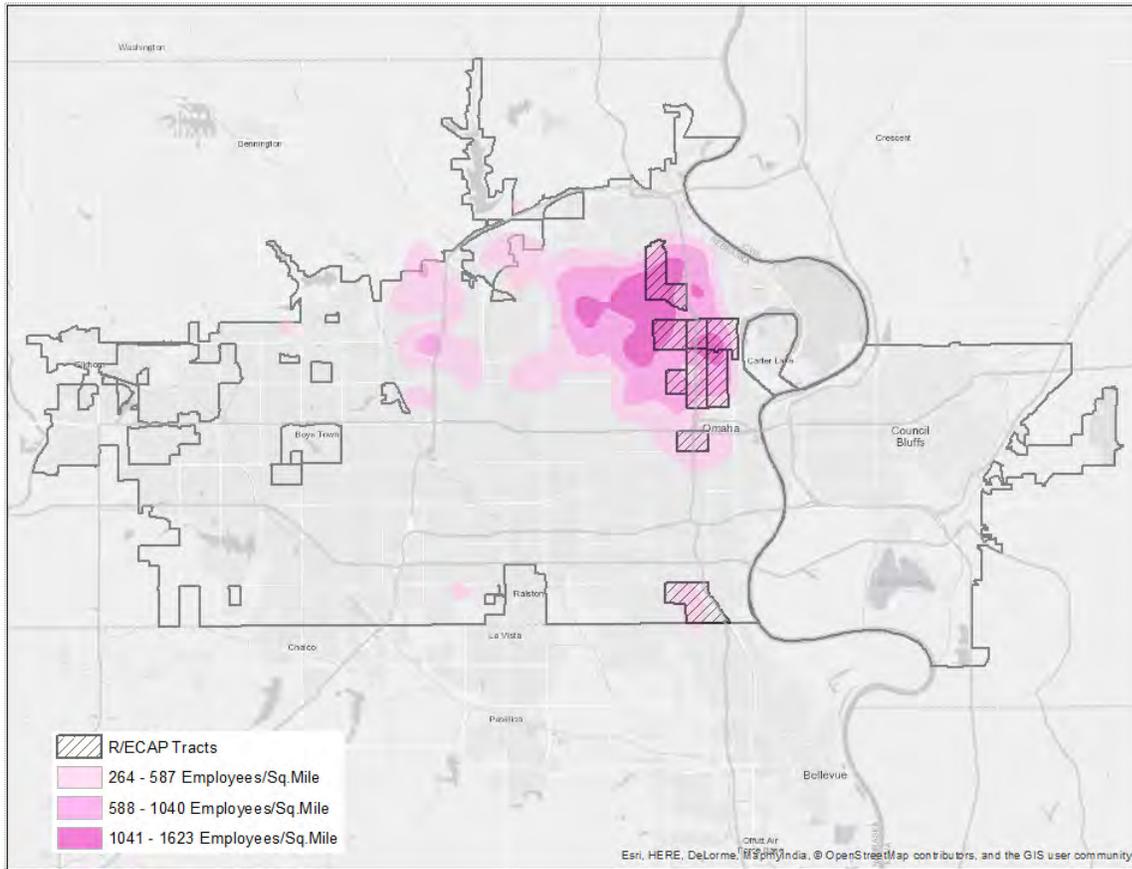
Most of the national origin households are in lower job proximity index areas. This is also true for households with families.

Job proximity is likely to have an impact on employment opportunities. The residents that are dependent on affordable transportation to and from employment centers have been more constrained. Currently, Bellevue has one public transportation route to employment centers in the Omaha metro area which limits the amount of accessibility to these areas.

As shown in the HUD map, most areas of Bellevue have high labor market engagement indexes, but the lowest areas appear to be Offutt Air Force Base and military housing areas. This could be a result of the inclusion of labor-force participation and bachelor degree percentages in the Labor Market Engagement Index.

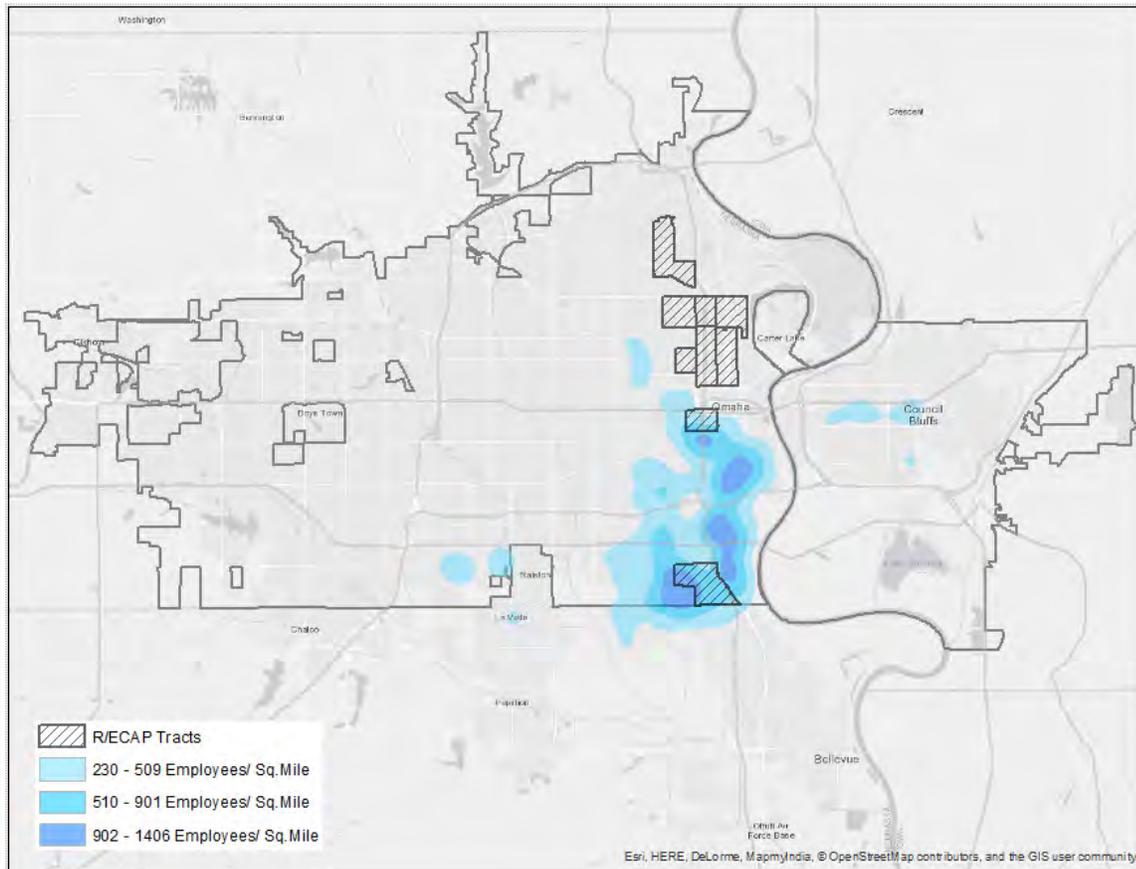
Higher numbers of families with children can be found in the census tract with military housing located in southwest Bellevue.

Figure V -73 Black and/or African American Identifying Employees Omaha



Source: 2014 LEHD; 2016 ACS; The map above shows the concentration of employees who identify as Black or African American in Omaha

Figure V -74 Hispanic and/or Latino Identifying Employees Omaha



Source: 2014 LEHD; 2016 ACS The map above shows the concentration of employees who identify as Hispanic or Latino in Omaha

In contrast, the highest concentration of Black employees is located in the northeast, and the highest concentration of Hispanic employees is found in the southeast. This information correlates with the HUD's Job Proximity map and highlights the lack of employment in northeast Omaha and the low proximity to jobs that many Black and Hispanic employees face, a burden shared by many living in nearby R/ECAP areas. Moreover, In addition to the spatial distribution of employment and employees, industry type and educational attainment should be considered, as many of the jobs that residents in the northern and southern parts of the city qualify for, may be located in west and southwest Omaha. As Heartland 2050 points out in the Fair Housing Equity Assessment, about half of jobs closer to the northeastern and southeastern Omaha are in downtown, jobs are largely high skilled jobs - for example, Public Administration (18%), Finance and Insurance (17%), and Professional, Scientific, and Technical Services (14%) - and require higher educational attainment. Essentially, due to lower educational attainment, spatial distribution of employment opportunities, and lack of

reliable transportation, many Black and Hispanic households living in eastern Omaha likely face additional hurdles finding and maintaining employment.

Regardless of the attribution, people of protected classes face measurable disparities in regards to employment. According to 2014 ACS data, The unemployment rate for the city rests at 7.3%, 5.9% for White households, and 3.6% for Asian households. Yet, most other racial groups face unemployment rates of 10% or greater with American Indian/ Alaska Native households and Black households showing unemployment rates above 15%. For those who are employed, the annual median income for households living in Omaha is \$48,751, and White households enjoy a higher Median income of \$54,177. In comparison median income for Hispanic households falls to \$37,522, while the median income for Black households is \$26,076 - nearly half of the median income for all families living in Omaha. The disparities between racial groups in regard to unemployment and income are also reflected in the city's poverty levels. 16.8% of the Omaha's population lives below the poverty level, 43.8% of whom are employed. Along racial and ethnic lines, 12.4% those who identify as White live below the poverty line, while all other racial and ethnic groups have between 23% and 42.5% of their respective populations living in poverty.

Disability Community

According to disability population statistics for Douglas County, Nebraska based on 2005-2007 ACS PUMS data, disparities exist in the area of employment. Unemployment for persons ages 16 to 64 with a disability participating in the workforce is at 9.1 percent compared to ACS data for the same time period in the general population of Douglas County at 6.4 percent. The same ACS data also shows that 15 percent of persons ages 21 to 64 with a disability have a Bachelor's degree or higher, compared to 35 percent of the general population ages 25 year or over in Douglas County. Information from the Nebraska Disability Status Report based on 2010 ACS data indicates that statewide, the median earnings of people with a disability of working-age and employed full time was \$30,200 compared to an average of \$38,000 statewide for individuals without a disability.

Stakeholders in the employment community (Employers), mentioned not being able to fill a range of jobs including skilled constructors, administrative support, and technology based positions. They found that a variety of skills were lacking in prospective employees ranging from typing, and basic math to soft skills and understanding of technology. Additionally, employers identified lacking transportation and availability of childcare as key encumbrances to employee retention. Additionally, personal issues

like poor mental health , poor physical health, and substance abuse were noted as issues which hindered employment. In regards to RE\CAP areas employers specifically mentioned that these areas lack a skilled workforce. These responses seem to align with much of what both local data and HUD's data portrayed and point to both spatial and educational mismatches between local employment opportunities and potential employees.

COUNCIL BLUFFS

While the City of Council Bluffs has enjoyed numerous successes over the last five years, we have also experienced 0% growth rate in our overall population, a flood in 2011 that devastated areas of the City and continues to be a financial hardship on both the City and numerous homeowners in the west end of Council Bluffs. In addition, attracting new businesses to Council Bluffs has been difficult due to the commercial property tax variances between the City of Council Bluffs and Omaha, NE.

Retail options for Council Bluffs residents have expanded over the past decade with new development of over one million square feet of retail space collectively at Metro Crossing and The Marketplace. However, the downside of this growth has been its negative impact upon Mall of the Bluffs. With over 75 storefronts, only 14 are currently occupied today. Other retail closures include Shopko which closed in 2017. Griffin Pipe, a large manufacturing company reduced its staff in 2015 laying off over 250 employees. In the last five years, it is estimated 370 jobs have been lost.

Council Bluffs Municipal Code for employment discrimination is outlined in 1.40.080 stating that any firm within Council Bluffs must adhere to the antidiscrimination requirements set forth (Attachment H). Municipal Code 1.40.140 also outlines retaliation guidelines under the discriminatory practices clause.

BELLEVUE

Bellevue has one major employer for the region which is Offutt Air Force Base. Most of the employment centers are located outside of the city limits which requires commuting.

Table V-26 Bellevue Employers

Employer	Industry	Employees (approx.)
Offutt Air Force Base	Military	9,000
Bellevue Public Schools	Education	1,500
Bellevue University	Education	650
Hillcrest Health Systems	Senior Care	650
Walmart	Retail	500
City of Bellevue	Government	420
Nebraska Medicine Bellevue	Medical	400

Source: Bellevue Chamber of Commerce

Stakeholders expressed that the majority of Bellevue residents provide their own transportation to employment and live in the community for the opportunities provided such as schools, safety services, and the sense of community.

c. Transportation

i. For the protected class groups HUD has provided data, describe any disparities in access to transportation related to costs and access to public transit in the jurisdiction and region.

Transportation Index Score Tables

HUD provides the Transit Index and the Low Transportation Cost Index to help gauge transportation infrastructure. The Transit Index (V-27) estimates how often public transportation is used by families and is used by HUD as measure of access to transit. Higher scores on the Transit Index indicate greater public transportation use. HUD’s Low Transportation Cost Index (Table V-28) is a estimate of household transportation costs, higher scores on this index indicate lower transportation costs. Both indices are based on data from the 2008-2012 Location Affordability Index (LAI) and are used to paint a general picture of transportation costs and transit use for the entire country.

Figure V -27 Regional T ransit Index

Transit Index Scores				
	(Omaha, NE CDBG, ESG) Jurisdiction	(Bellevue, NE CDBG) Jurisdiction	(Council Bluffs, IA CDBG) Jurisdiction	(Omaha-Council Bluffs, NE-IA) Region
Total Population				
White, Non-Hispanic	35.71	30.31	31.89	28.43
Black, Non-Hispanic	37.77	30.29	33.40	36.42
Hispanic	38.8	29.17	32.88	35.69
Asian or Pacific Islander, Non-Hispanic	38.12	30.48	32.08	34.19
Native American, Non-Hispanic	38.5	31.21	33.17	34.00
Population below federal poverty line				
White, Non-Hispanic	38.7	30.44	32.63	31.91
Black, Non-Hispanic	38.59	33.56	31.26	37.95
Hispanic	41.01	28.92	33.05	38.57
Asian or Pacific Islander, Non-Hispanic	41.14	29.78	32.00	38.16
Native American, Non-Hispanic	43.18	26.66	33.79	41.08

Source; HUD Table 12 Opportunity Indicators by Race/Ethnicity

While the region as a whole has low scores on the Transit Index, Omaha has by far the most robust public transportation system in the region and has the highest transit index scores as well, consistently scoring higher than the regional average. Additionally compared to the region, White households show the lowest Transit Index scores, this is likely due to a large number of White households living outside of urban areas who do not have access to public transportation.

OMAHA

Within Omaha, White households are shown to use public transportation the least and score about two to three points less than other ethnic groups on the Transit Index, all other groups only vary about one point from each other. While those who fall below the federal poverty line are shown to use public transportation more often compared to the population as a whole, Black households living below the poverty line showed the least public transportation use as well as the smallest increase in public transportation use compared to their counterparts above the poverty line.

Figure V -28 Regional Low T ransportation Cost Index

Low Transportation Cost Index Scores				
	(Omaha, NE CDBG, ESG) Jurisdiction	(Bellevue, NE CDBG) Jurisdiction	(Council Bluffs, IA CDBG) Jurisdiction	(Omaha-Council Bluffs, NE-IA) Region
Total Population				
White, Non-Hispanic	70.72	60.89	66.28	60.80
Black, Non-Hispanic	71.63	61.91	68.52	69.82
Hispanic	73.43	60.86	68.59	69.60
Asian or Pacific Islander, Non-Hispanic	74.97	61.56	67.49	68.93
Native American, Non-Hispanic	73.64	62.03	68.19	67.42
Population below federal poverty line				
White, Non-Hispanic	75.59	63.31	68.18	66.20
Black, Non-Hispanic	72.20	67.31	68.02	71.51
Hispanic	76.00	59.39	66.99	72.76
Asian or Pacific Islander, Non-Hispanic	79.43	64.02	63.00	75.31
Native American, Non-Hispanic	76.73	56.68	69.41	74.27

Source; HUD Table 12 Opportunity Indicators by Race/Ethnicity

HUD' s Low Transportation Cost Index also shows that Omaha has the lowest transportation costs in the region, and consistently scores higher than the regional average. Again, White households show the greatest variation in transportation costs compared to the region, which is likely due to to the large number of White households living outside of urban areas who likely have longer commutes and who do not have access to public transportation.

For the total population in Omaha, White households have the highest transportation costs. All household living below the poverty line show lower transportation costs than the total population. Yet among those who fall below the federal poverty line, Black households have the highest transportation costs and only show a minimal improvement in transportation cost when compared to their counterparts above the poverty line.

Index Tables Conclusion

Both the Transit Index and the Low Transportation Cost Index show that Omaha's total population as well as its population living below the federal poverty line scores higher than the regional average on both measures. This indicates that the city of Omaha has higher quality transportation infrastructure compared to other cities in the region and the region as a whole. The tables also indicate that, those living below the federal poverty line in Omaha are more likely to have lower transportation costs and use public transportation more often compared to the city's total population. Yet of the racial and ethnic populations living below the federal poverty line, Black households had the lowest transportation use, highest transportation costs, and showed less than a one point increase on both indices, a much lower variation compared to other ethnic groups. This indicates that Black households, particularly households living below the poverty, likely face additional transportation burdens.

COUNCIL BLUFFS

According to Table 12, transportation costs for metro residents are similar for all races. The Low Transportation Cost Index indicates the population below the poverty line spends a higher percentage of income on transportation. Proximity to jobs is similar for all races and economic classes across the board.

Lack of adequate public transportation continues to be an issue in Council Bluffs. In 2016, bus routes were modified to provide more stops along the most utilized routes. This change made little impact on the number of riders utilizing the system.

BELLEVUE

Bellevue has very limited availability of public transportation which could account for the low transit trip indexes. The Transit Trips Index reflects this fact with low values for all race and ethnicities. For the total population, the Transit Trip Index is around 30 for all races and ethnicities. The index drops slightly for the average population living below poverty. The Black population living below poverty utilizes public transportation more than the total population of Blacks while Native Americans living below the poverty line utilize public transportation significantly less than the total population of Native Americans.

The lack of public transportation and low job proximity could cause the increase in transportation cost. Bellevue's low transportation cost index ranges from 60-62 for all race/ethnicity of the total population. Hispanic and Native Americans living below the poverty line face higher transportation costs than their total population counterparts.

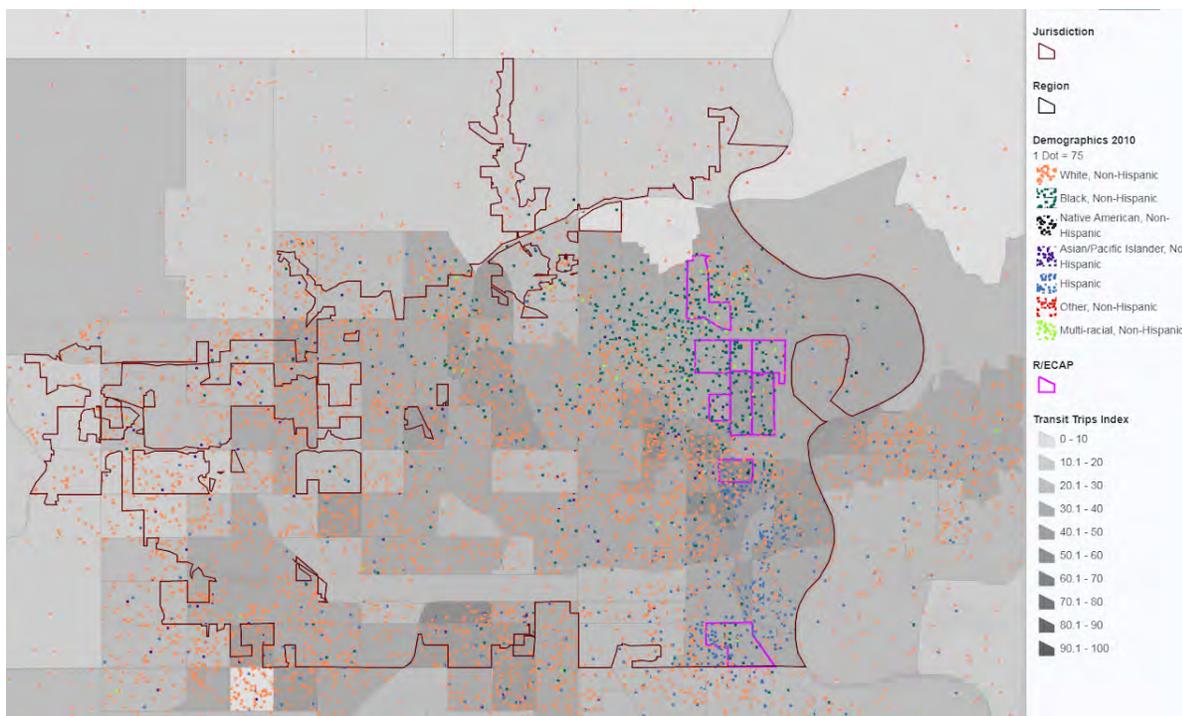
ii. For the protected class groups HUD has provided data, describe how disparities in access to transportation related to residential living patterns in the jurisdiction and region.

OMAHA

Transit Trips

HUD Maps 1 and 2 both relate to HUD's Transit Index and show how often low-income families in a neighborhood use public transportation. These maps imply that the areas with the highest public transportation use are located primarily in East-central Omaha along with high levels in the Northwest, while a noticeably lower level of public transportation use can be observed in the Southwestern parts of the city.

Figure V -75 Comparison of Transit Trips and Race/Ethnicity

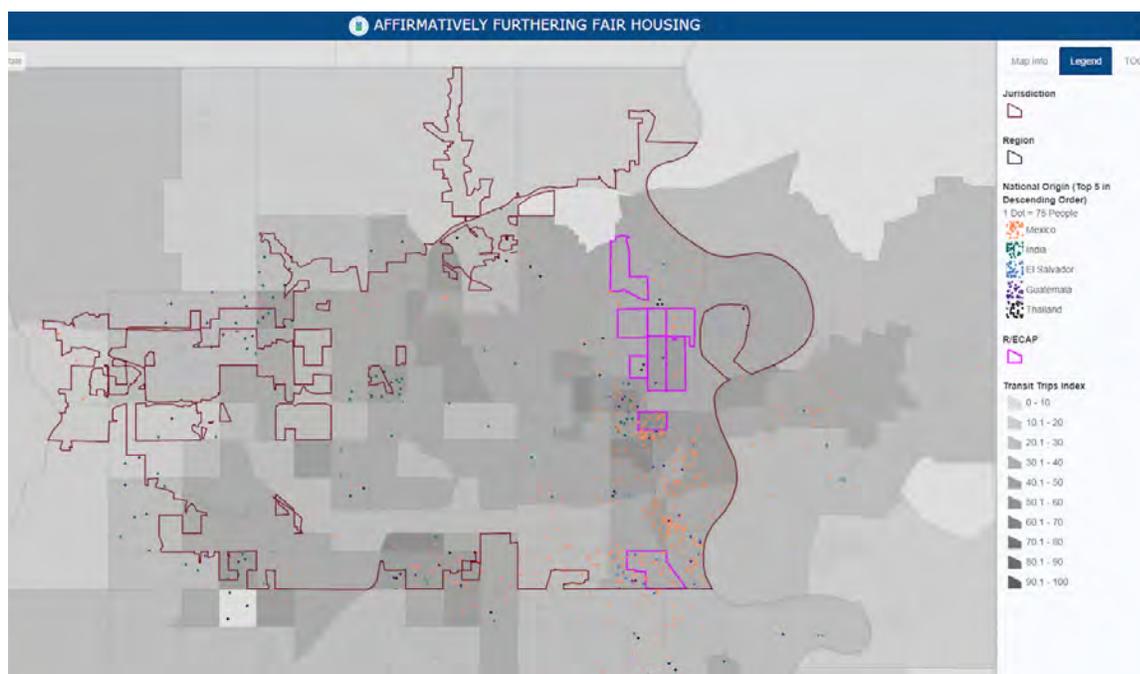


Source: HUD Map 10 Demographics and Transit Trips

When viewing HUD Map 1, it is immediately noticeable that there are concentrations of racial and ethnic groups in northeastern and southeastern Omaha. In the Northeast there is a large concentration of Black households and in the Southeast a large concentration of Hispanic households. The concentration of Black households in the Northeast coincides with areas that have lower transit trip scores for the city (30-40), and may explain why these households are shown to use public transportation less in

the Transit Index. In the Southeast the concentration of Hispanic households is aligned with a mix of both low scoring and above average scoring areas, which may explain why they are shown to have relatively higher public transportation use.

Figure V-76 National Origin and Transit Trips



Source: HUD Map 10 Demographics and Transit Trips

HUD Map 2 shows that people with Mexican, El Salvadoran, and Guatemalan origin are clustered in areas in the south and southeast which generally align with areas of average and above average usage of public transportation when compared with the rest of the city.

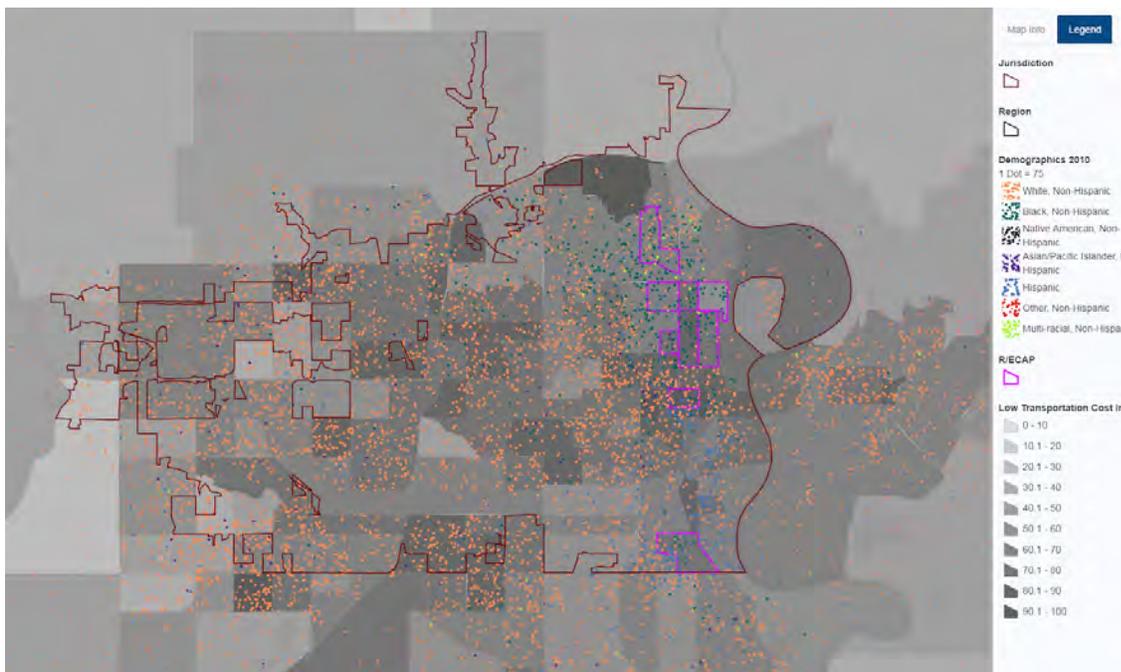
Both HUD Maps 1 and 2 show a general misalignment between R/ECAP areas and higher public transportation use. All nine of the areas R/ECAPs are located in eastern Omaha, Seven of these areas are located in northeast Omaha, five of which have average transit trip scores compared to the city as a whole. Additionally, these seven R/ECAP areas overlap with concentrations of Black residents, which have been shown to use public transportation least among those who fall below the federal poverty line. The remaining 2 R/ECAPs, located in the midtown area just outside of the downtown core and in southeast Omaha, coincide with areas which had low and above average scores on the transit trips index compared to the rest of the city. These maps indicate that in the majority of R/ECAP areas public transportation is utilized at a low rate

compared to the rest of the city, and that public transportation use by low income households is generally highest in and around the downtown core.

Low Transportation Cost

Both HUD Maps 3 and 4 depict low transportation costs throughout the city. The areas with the lowest transportation costs are generally located in and around the city's urban core, with other areas of low transportation cost appearing along highways and major arterials, as well as in close proximity to employment centers. Areas of higher transportation cost are located in the northeast, south central, and the westernmost areas of the city.

Figure V-77 Transportation Cost and Race/Ethnicity Omaha



Source: HUD Map 3 Transportation Cost Index and Race/Ethnicity

HUD Map 3 focuses on racial and ethnic distributions in relation to the Low Transportation Cost Index.

HUD map 3 shows, both Black households in the north Omaha and White households in the westernmost edges of the City carry the some of the highest transportation costs. The concentration of the city's Hispanic households in the Southeast coincides with a patchwork of different levels of transportation costs. Asian/ Pacific Island households

are generally clustered throughout the city in lower transportation cost areas.

Figure V -78 Transportation Cost and National Origin Omaha



Source: HUD Map 11 Demographics and Low Transportation Cost; Nation Origin

Map 4 depicts national origin and transportation cost throughout the city. People with Mexican origins cover a spectrum of transportation cost levels in the southern and eastern parts of the city. Similarly, people with origins in El Salvador and Guatemala are spread throughout the south and east of the city occupying a range of transportation cost areas. While spread throughout the city, those with origins in India are mostly clustered in low transportation cost areas. People with origins in Thailand are clustered throughout the city, yet there are significant pockets of this population in north and northeastern Omaha who are subject to higher transportation cost compared to the rest of the city.

Both maps show that R/ECAP areas are split between high and low transportation cost areas. R/ECAPs in close proximity to downtown and in southeastern Omaha show lower transportation costs. However three R/ECAPs in northeastern Omaha show higher transportation costs compared to the rest of the city. This difference in transportation costs is likely due to less public transportation use as well as higher costs associated with a greater proximity to jobs and other daily resources for households living in the later R/ECAP areas.

HUD Map Conclusion

Overall HUD's Low Transportation Cost Index and Transit Trips Index show that, in Omaha, the areas with highest use of public transportation are generally in and around the Downtown and Midtown with other areas of noticeably high use located in the northwest and south western parts of the city. Areas with low transportation cost extend from downtown through central Omaha to the west and northwest of the city, leaving areas with higher transportation costs located in the Northeast, along the western edge, and scattered through the southeastern parts of the jurisdiction.

Except for areas closest to the downtown core, concentrations of Black households in northeast Omaha overlap with areas of lower public transportation use and higher transportation costs. Hispanic households and households originating from Mexico and Guatemala which are concentrated in the southeast overlap with areas of lower and above average public transportation use, and areas of both lower and high transportation costs. Further, many R/ECAP areas are shown to have higher transportation costs and an average use of public transportation when compared to the rest of the city, while R/ECAP areas adjacent to Downtown and Midtown show lower transportation costs and higher public transportation usage.

COUNCIL BLUFFS

In Council Bluffs, public transit is less developed than other portions of the metro area. The Transit Trip Index illustrates the West End, Mid-City and Downtown areas have the highest access to public transit. Council Bluffs continues to partner with agencies to increase access to public transportation but it is a work in progress. Currently Metro Area Transit (MAT) has two fixed routes within Council Bluffs:

- (1) West Broadway to Metro Crossing, Market Place and the Mid America Center and
- (2) West Broadway to the Lakin Human Services Campus, Iowa Western Community College and Mall of the Bluffs.

Additionally, Southwest Iowa Transit Agency (SWITA) offers paratransit (on demand) service. In 2017, the City began contracting with SWITA to provide paratransit and taxi services.

SWITA also provides two "work routes" that provide round trip transportation to specific companies in the area:

(1) Menards Distribution Center in Shelby, Iowa. The route is available between Atlantic, Council Bluffs and Shelby Monday through Saturday for all three shifts.

(2) OSI in Oakland, Iowa. This route is available between Omaha, Council Bluffs and Oakland seven days a week for the 5:00 am shift. It is also open to the public with a round trip costing \$7.00.

BELLEVUE

Overall, Bellevue has very low access to transit which means all race/ethnicity and national origin households face a higher cost for transportation. This is also true for the region. National Origin households have higher transit trips indexes overall since most households are in northern Bellevue. Households with children in southern Bellevue have slightly higher access to public transportation than the household in north center Bellevue.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to transportation.

OMAHA

HUD's indices were developed to depict information for the entire country, and unfortunately can overlook important information at the local level. The Transit Trips and Transportation Cost indices are no exception. The Transit Trips Index, is a estimate of transit usage based on self-reported trips to work by a narrowly defined group of low income households. It does not account for actual existence of transit routes or the frequency of service, yet it is used to estimate access to transit. While in larger, denser urban areas this index may be useful in identifying the location and intensity of public transportation usage, in the Omaha- Council Bluffs Region this measure is less accurate. The Transportation Cost Index is hindered at the local level because scores are percentile ranked nationally, which overlooks how affordable or unaffordable transportation is as a percentage of household income.

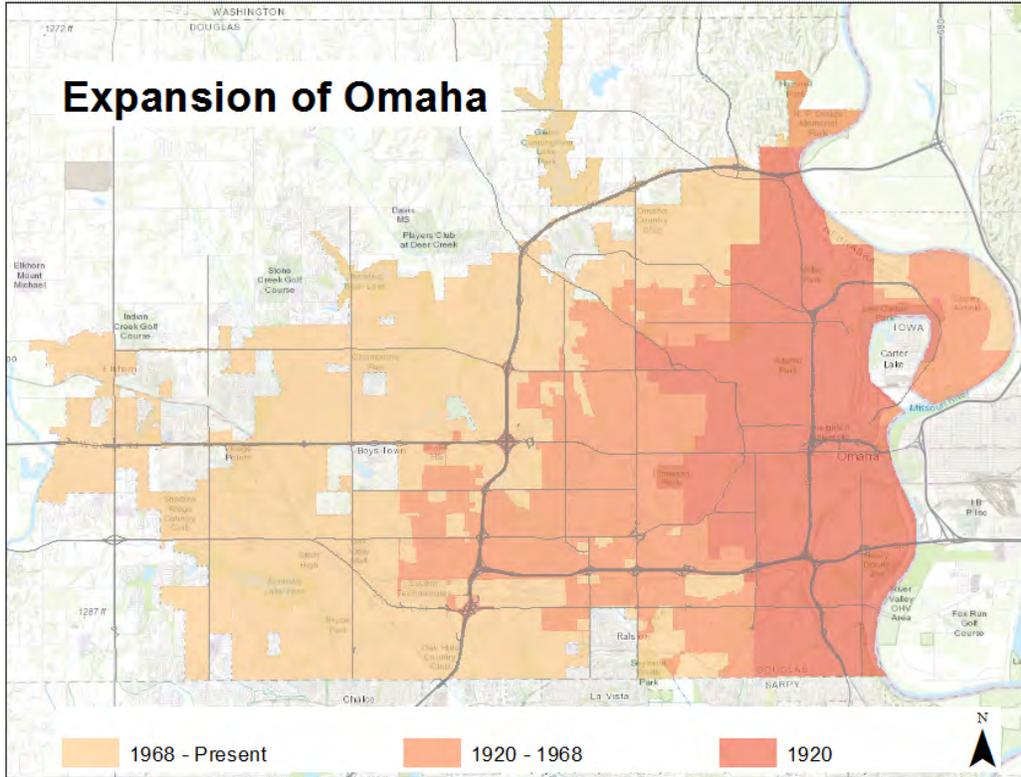
Table V-29 Vehicle Ownership Rates by County

Vehicle Ownership by County 2012-2016			
Number of Vehicles Per Household	Pottawattamie	Douglas	Sarpy
No Vehicle	6.5%	7.7%	2.6%
1 Vehicle	32.1%	35.2%	27.3%
2 Vehicles	38.5%	39.8%	45.3%
3 + Vehicles	22.9%	17.3%	24.7%

Source: U.S. Census Bureau 2012-2016 ACS (5 yr)

Local data shows that, as with most American cities, the automobile has had an unprecedented impact on Omaha’s urban form. Omaha began orienting its streets to car travel in the 1920s and by 1960, travel within the city was predominately by car. This mode of travel was a catalyst for Omaha’s expansion, allowing families to move from the dense urban center into new suburban subdivisions. This suburban growth was further facilitated by the development of the Interstate Highway System, which allowed for faster travel over longer distances, and both federal and local policies which incentivised development of communities further from the urban core. (Transportation Element, p.7; Mirror Mirror p.201)

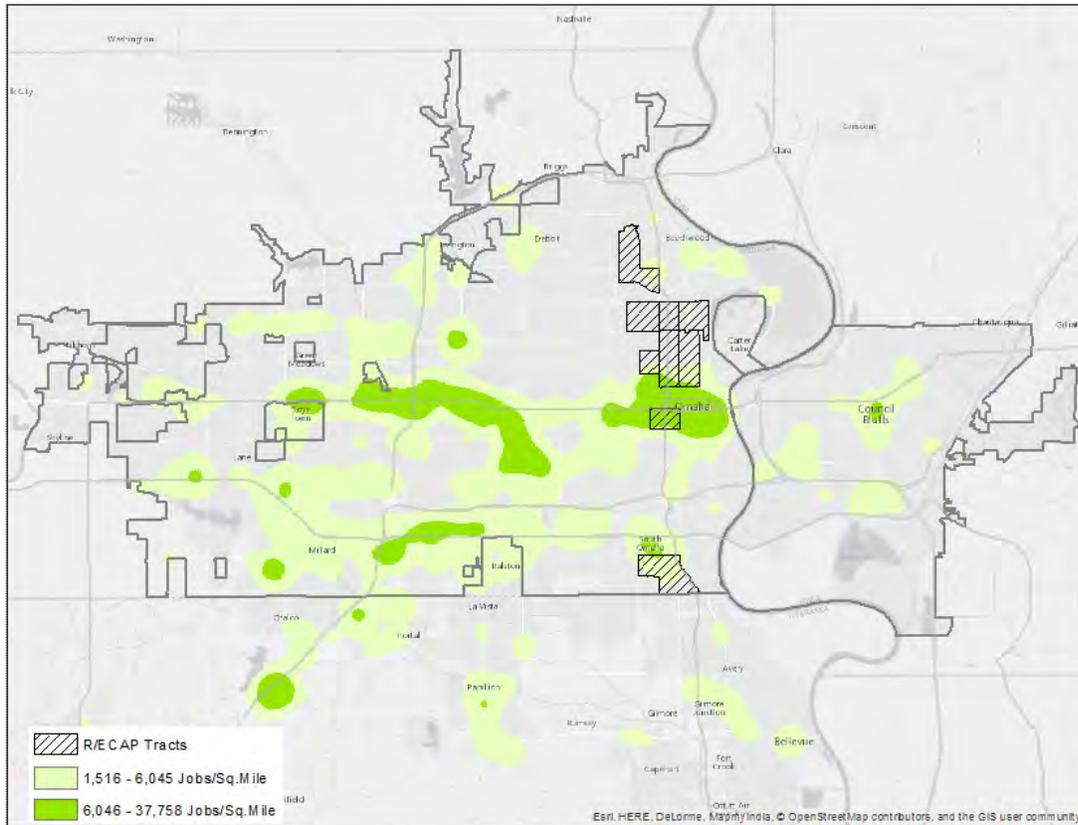
Figure V-79 City of Omaha Expansion 1968 to Present (2018)



Source: City of Omaha Planning Department (2018)

With its physical expansion increasing twice as fast as population growth, Omaha has excelled at low density, auto-centric growth. As a result, today approximately 92% of commutes to work are by car and 82% travel alone.

Figure V -80 Omaha R/ECAPs and Employment Density

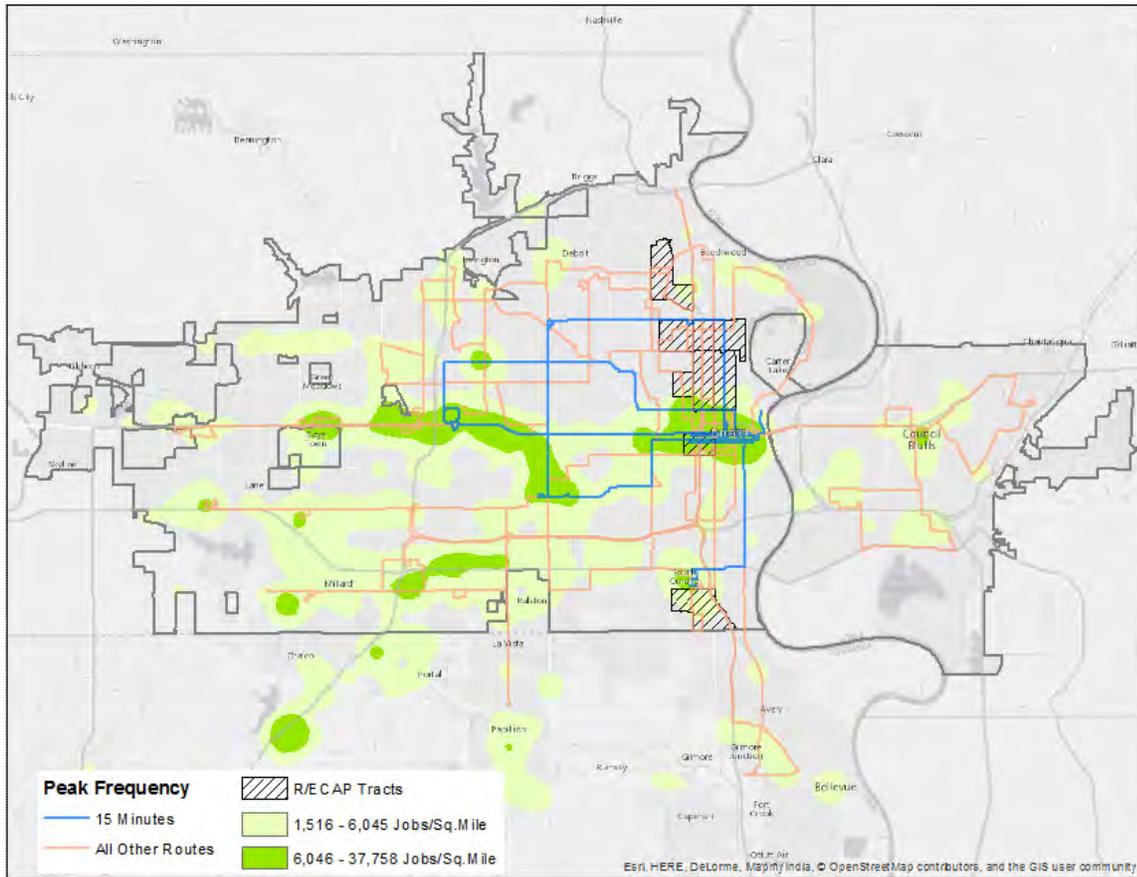


Source: Source LEHD, 2014; U.S Census, 2010

While transportation is important to accessing many resources throughout the city, there is little doubt that employment is one of the most important resources for any household. Map 5 shows the concentrations of employment which have developed within Omaha and highlights these concentrations in relation to R/ECAP areas. Generally, employment is most heavily concentrated in downtown, central, western, and southwestern Omaha. Additionally, there are contiguous areas of high employment which extend from the downtown area westward and connect the most heavily concentrated areas.

For the most part, R/ECAP areas about the City's downtown employment core and extend outward to the north and south. While R/ECAP areas can be said to have a reasonable proximity to downtown employment, there is an obvious separation of R/ECAP areas from the other employment centers in the western and southwestern most parts of the city. This mismatch between employment and R/ECAP areas indicates that there are spatial barriers and higher costs to accessing and maintaining employment for people living in and around these areas, especially as the city has become reliant on car ownership for transportation.

Figure V -81 R/ECAPS, Employment Density , Metro Routes Omaha/Council Bluffs



Source LEHD, 2014; U.S Census, 2010; City of Omaha; Employment Density,R/ECAP areas, METRO bus route frequency

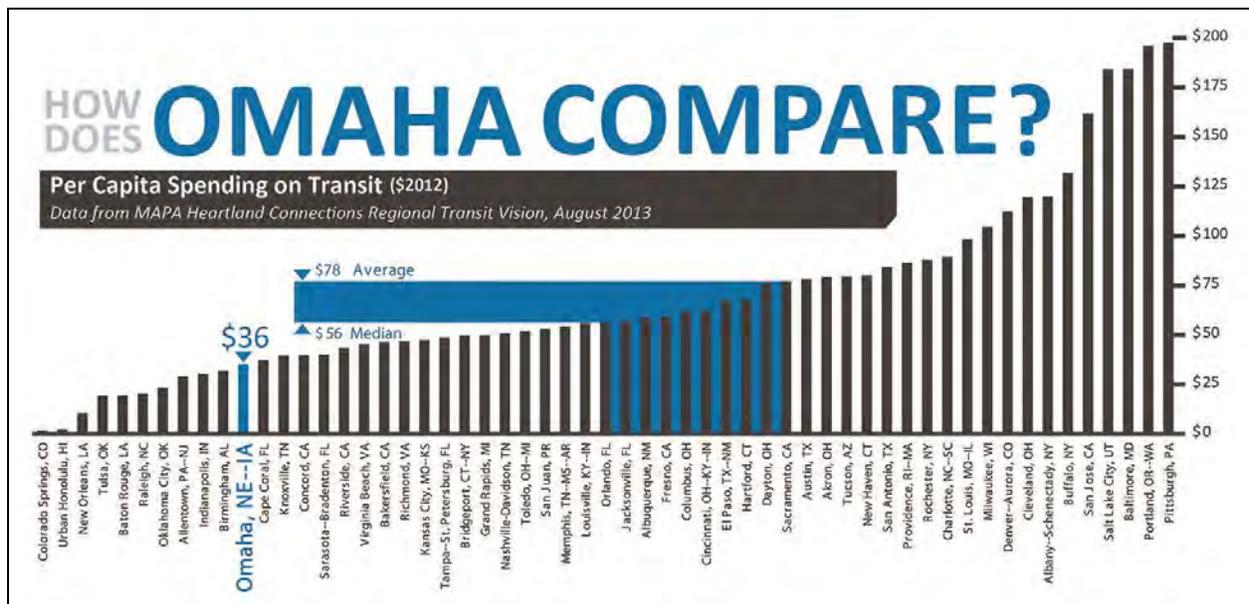
When Omaha’s weekly public transportation routes are compared to employment areas (Map 6), It becomes clear that there is good (15 minute frequency) transit service linking the eastern parts of the city to Downtown and central employment centers. Outside of this area, service drops to a much less reliable 30 minute frequency, reaching additional concentrations of employment in the west and southwestern areas of the city. Unfortunately, the fringes of the city, including some of the western and southwestern most areas of employment, have limited service (1 hour or greater frequency) at best.

There are additional characteristics of Omaha’s public transportation system to consider, along with what is depicted in the preceding maps. Omaha’s public transportation services vary in frequency throughout a given day, many routes fall below the depicted peak frequencies, in the evenings, outside of peak hours, and additionally, many transit trips require one or more transfers which can add substantial wait times

and extend total travel time. Moreover, on Saturdays transit service is reduced to 30 minute frequency at best, many routes which run at 30 minute frequency during weekdays are reduced to hourly intervals, and several routes are not provided. On Sundays service is further reduced only four routes provide 30 minute service, most routes run on a hour or greater frequencies, and even more routes are discontinued.

When the city's transit system is analyzed it becomes apparent that there are gaps in service and many areas which lack reliable service, especially on weekends and outside of peak hours. In general, public transportation is best in eastern and central Omaha, while coverage and service frequencies atrophy throughout the suburban reaches of the City. This means that while R/ECAP areas may have good access to transit, the usefulness of transit is limited to eastern and central Omaha which limits access to more suburban opportunities. These shortfalls in service likely have a greater impact on the city's most vulnerable populations, people living in and around R/ECAP areas and those who cannot afford a car. This being said, Omaha's public transit provider (Metro) may be among the most efficient transit agencies in the country. Metro, has done a lot with tight fiscal constraints, which are partially a result of a cap on its tax based income. According to MAPA's 2013 Heartland Connections Regional Transit Vision, Metro receives less than half of the national average for transit funding per person. This below average level of investment in public transit no doubt impacts Metro's ability to provide quality service throughout Omaha and the greater metropolitan area.

Figure V -82 Investment in T ransit Per Capita



Source: MAPA Heartland Connections Regional Transit Vision, 2013

Community Feedback

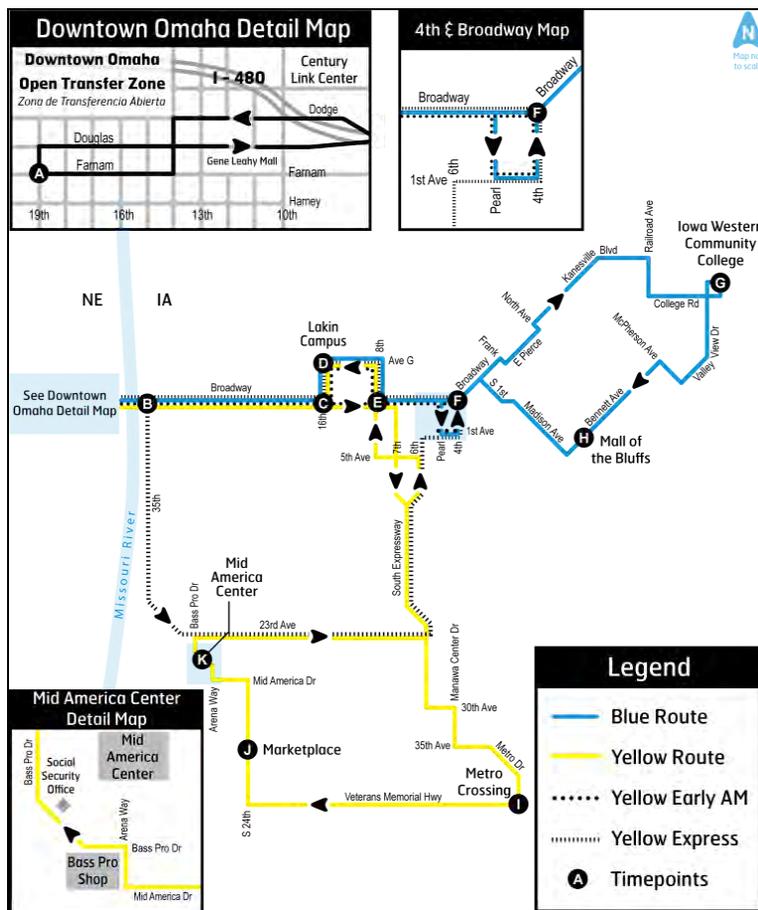
Community Feedback reinforced many of the issues surrounding transportation mentioned above. When asked what modes of travel people use to get to work, 93% of those surveyed said that they travel to work by automobile, while 7% said they commute using METRO bus service and about 12% said that they walk or cycled to work. Other than having access to a car and personal preferences, survey respondents mentioned long commutes (30%), infrequent service (22%), and lack of connectivity(25%) as reasons for not using public transportation. More than 35% of respondents noted typical trips by bus took greater than 30 minutes, and just over 10% said that typical bus trips take more than an hour. So It is no surprise that, following close behind votes for increased awareness of fair housing issues (20%) and increasing affordable housing in close proximity to where people work (20%), 18% of those surveyed said that federal dollars should be spent on public transportation in order to address fair housing issues. Moreover, meetings with stakeholder groups Identified a lack of affordable housing near public transportation as a key fair housing issue in the region. Stakeholder sub groups also identified transportation to jobs, limited public transportation after hours and on weekends, limited public transportation options in low income areas, and a lack of transportation funding as prevalent issues facing the city.

COUNCIL BLUFFS

According to the US Census American Community Survey, 83.8% of the workforce own their vehicle. This is up from the 2000 Census which stated 81.8% owned their own vehicle. Only 1.1% of the population utilizes public transportation for commuting to work.

Main concerns fielded from the public were related to transportation and busing not available in employment corridors or ending before third shift. The City has worked to relocate many of the industrial-type businesses to the south along Veterans Memorial Highway away from residential corridors. This has created an area where public transportation struggles. Additionally, many of Council Bluffs residents work in Omaha and are required to commute to areas where public transit does not connect or is time prohibitive.

Figure V-83 Council Bluffs Metro Area Transit Routes

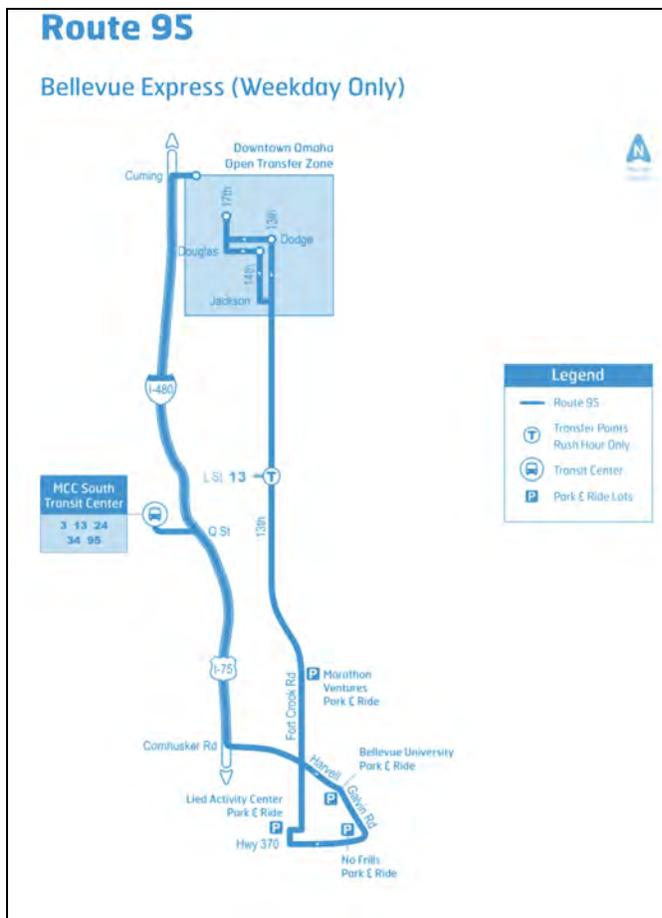


Source: www.ometro.com

BELLEVUE

The 2011-2015 American Community Survey reported 84.7 percent of the labor force commuted alone to work with a mean travel time of 20.7 minutes. Only 17.2% occupied households have access to one vehicle and 1.3 percent of households do not have a vehicle available. Those with access to two or more vehicles make up 45.2 percent of occupied households, and three vehicles or more is 36.1 percent. To commute to work, 84.7 percent drive alone, 11.3 percent carpooled, 0.1 percent used public transportation, 0.7 percent walked, 1 percent use taxicab, motorcycle or other means, and 2.2 percent work from home.

Figure V -84 Bellevue Express Route 95



Source: Omaha METRO Routes, ometro.com

To help address any transportation needs, the Omaha Metro public transportation system provides one route through Bellevue. The Bellevue Circulator Express, or Route 95, runs through the city limits and provides service to Downtown Omaha, Metro

College Transit Center (MCTC), Metro Community College - South Campus, Downtown Bellevue, Bellevue Plaza and Bellevue University. Below is a map showing this route.

The public transportation route runs through the older part of the community that is already well established and with limited open land available for new development. The area also has more affordable housing which is close to transportation, services, and job centers. In Bellevue, public transportation possesses an impediment. Most services are offered in Omaha, such as the VA Medical Clinic. The only public transportation loop provided only runs twice a day so those individuals must depend on other modes of transportation that may not be as affordable.

The City of Bellevue operates a Specialized Transportation Bus Service. This service is a limited senior and disabled transportation program, which offers door-to-door service in the Bellevue and Omaha area Monday through Friday. For this service, elderly must call in advance and pre-register for transportation services for a minimum fee, but it limited to daytime hours from 8 a.m. to 4:30 p.m.

Community input reiterated the desire to reside in Bellevue comes with the knowledge that the majority of work transportation must be done by personal car due to the lack of public transportation and the limited number of job centers located within Bellevue.

Conclusion

People of color and low-income residents in the Omaha Metropolitan area, as well as those living in Racially/ethnically-concentrated areas of poverty (R/ECAPs) have access to public transportation. However, service to suburban employment centers and areas of job growth in the metro area is limited. Past public policy coupled with a car-focused real estate market has encouraged the movement of jobs from the urban core westward to the suburban edge. This in turn has created a spatial mismatch where, those living in eastern Omaha, including those in R/ECAP areas, are separated from employment and other opportunities farther out. Because of fragmentation, the public transportation system has not been able to make strong connections between R/ECAP areas and suburban opportunity. In addition, in its current form, the public transportation system has lost influence on real estate market decisions to create favorable development patterns that allow for higher employment levels in and near R/ECAPs areas.

This said, a community conversation recently began around elevating the region's transit system, fostering stronger connections between areas of concentrated poverty and people of color to opportunities, and more importantly how to foster development

patterns suitable to return jobs in and around R/ECAP areas which have been lost over the past fifty years. Two projects which will begin this process are already underway; a Bus Rapid Transit line along Omaha's main corridor (Dodge Street) which is expected to be completed in 2018, and a Modern streetcar line connecting the city' Downtown and Midtown districts which is currently in final design.

d. Access to Low Poverty Neighborhoods

i. For the protected class groups HUD has provided data, describe any disparities in access to low poverty neighborhoods in the jurisdiction and region.

According to the AFFH Rule Guidebook, the Low Poverty Index measures the poverty rate by neighborhood. The index incorporates the family poverty rate of a census tract and how many households within that tract receive public assistance. The higher the number more likely it is that a family may live in a low poverty neighborhood, the lower the number, the more likely it is that the family is living in a neighborhood with a higher rate of poverty.

Table V-30 Regional Low Poverty Index

(Omaha-Council Bluffs, NE-IA) Region	
Total Population	
White, Non-Hispanic	67.30
Black, Non-Hispanic	34.02
Hispanic	41.73
Asian or Pacific Islander, Non-Hispanic	64.02
Native American, Non-Hispanic	47.53
Population below federal poverty line	
White, Non-Hispanic	51.23
Black, Non-Hispanic	23.91
Hispanic	31.44
Asian or Pacific Islander, Non-Hispanic	47.89
Native American, Non-Hispanic	32.94

Source: HUD Table 12 Opportunity Indicators by Race/Ethnicity

Across the region, White and Asian/Pacific Islander households have a significantly higher chance of living in a low poverty neighborhood compared to all other race/ethnicity categories when comparing residents who live both above and below the poverty line. Black, Non-Hispanic families live in neighborhoods with the highest rates of poverty, followed by Hispanic and Native American Households.

OMAHA

Table V-31 Low Poverty Index Omaha by Race/Ethnicity

(Omaha, NE CDBG, ESG) Jurisdiction	Low Poverty Index
Total Population	
White, Non-Hispanic	61.13
Black, Non-Hispanic	27.25
Hispanic	32.61
Asian or Pacific Islander, Non-Hispanic	55.42
Native American, Non-Hispanic	36.76
Population below federal poverty line	
White, Non-Hispanic	46.05
Black, Non-Hispanic	20.99
Hispanic	25.10
Asian or Pacific Islander, Non-Hispanic	42.30
Native American, Non-Hispanic	31.23

Source: HUD Table 12 Opportunity Indicators by Race/Ethnicity

According to HUD table 12, low-poverty index, in the Omaha jurisdiction is very similar to the regional data in terms of the race/ethnicity of the households who are most and least likely to live in low-poverty neighborhoods. One difference however, is that all races and ethnicities both above and below the poverty line have a lower index in Omaha, suggesting that there are more households who have less access to low-poverty neighborhoods. The difference between the Omaha jurisdiction and the region is greater for those living above the poverty line. Below the poverty line there is a greater difference for White and Hispanic households than across the region, but White households still have the highest index over all.

COUNCIL BLUFFS

Figure V -32 Council Bluffs Low Poverty Index by Race/Ethnicity

(CNSRT-Omaha, NE CONSORTIA) Jurisdiction	Low Poverty Index
Total Population	
White, Non-Hispanic	62.77
Black, Non-Hispanic	29.91
Hispanic	35.35
Asian or Pacific Islander, Non-Hispanic	61.10
Native American, Non-Hispanic	40.39
Population below federal poverty line	
White, Non-Hispanic	45.96
Black, Non-Hispanic	22.91
Hispanic	26.08
Asian or Pacific Islander, Non-Hispanic	44.35
Native American, Non-Hispanic	31.17
(Omaha-Council Bluffs, NE-IA) Region	
Total Population	
White, Non-Hispanic	67.30
Black, Non-Hispanic	34.02
Hispanic	41.73
Asian or Pacific Islander, Non-Hispanic	64.02
Native American, Non-Hispanic	47.53
Population below federal poverty line	
White, Non-Hispanic	51.23
Black, Non-Hispanic	23.91
Hispanic	31.44
Asian or Pacific Islander, Non-Hispanic	47.89
Native American, Non-Hispanic	32.94

HUD Table 12 Opportunity Indicators by Race/Ethnicity

According to Table 12, Council Bluffs' residents of all races and ethnicities have similar access to low poverty neighborhoods. The low percentages of non-white residents is reflective of this number. As related to families living below the poverty line, Council Bluffs has a larger disparity with Non-Hispanic (56.67) and Asian or Pacific Islander, Non-Hispanic (61.00) significantly more likely to be below the federal poverty line than any other race/ethnicity.

BELLEVUE

In HUD AFFH Table 12, HUD provides the Low Poverty Index which measures concentration of poverty by neighborhood. The higher value on this index indicates a higher likelihood that a family may live in a low poverty neighborhood. A lower value indicates the group has a higher likelihood of living in neighborhood with higher concentration of poverty.

Figure V -33 Bellevue Low Poverty Index by Race/Ethnicity

Population	Low Poverty Index	
	Bellevue	Omaha – Council Bluffs
Total Population		
White, Non-Hispanic	62.65	67.30
Black, Non-Hispanic	61.34	34.02
Hispanic	58.69	41.73
Asian or Pacific Islander, Non-Hispanic	61.04	64.02
Native American, Non-Hispanic	56.98	47.53
Population below federal poverty line		
White, Non-Hispanic	51.64	51.23
Black, Non-Hispanic	34.88	23.91
Hispanic	61.35	31.44
Asian or Pacific Islander, Non-Hispanic	55.76	47.89
Native American, Non-Hispanic	61.98	32.94

Source: HUD Table 12 Opportunity Indicators by Race/Ethnicity

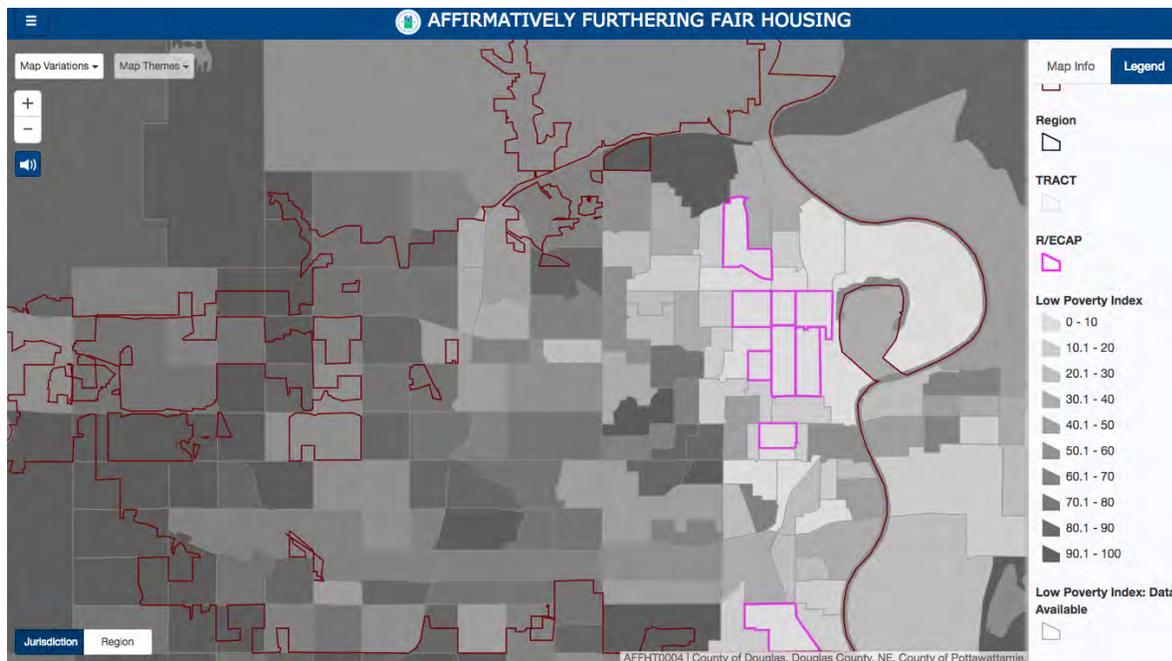
The total population of Bellevue has a higher likelihood of living in neighborhoods of lower poverty. The close range of the values indicated that no race or ethnicity faces a higher likelihood of living in a low poverty neighborhood.

The Black population living below the poverty line have a significantly higher likelihood of living in neighborhoods with higher concentrations of poverty. While Hispanics and Native Americans living below the poverty line are more likely to live in an area of low poverty.

ii. For the protected class groups HUD has provided data, describe how disparities in access to low poverty neighborhoods relate to residential living patterns of those groups in the jurisdiction and region.

OMAHA

Figure V -85 Omaha Low Poverty Index

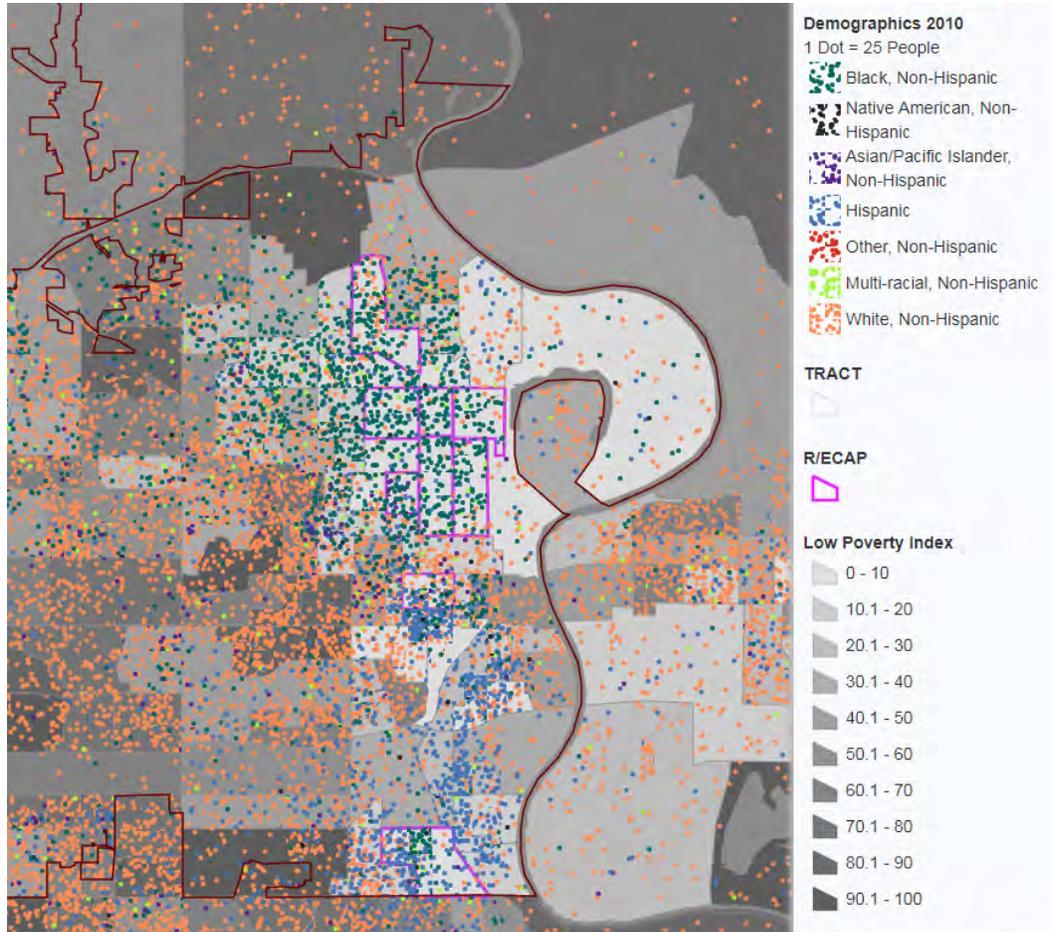


Source: HUD MAP 12 Low Poverty Index

The poverty index map above shows the distinct change in poverty index moving from West (left) to East (right). Eastern Omaha neighborhoods have much lower poverty index scores than those neighborhoods in the West. The map below includes the demographics layer for the low poverty index map.

Census tracts in the Northeast and Southeast Omaha have higher percentages of minority households and LEP families than those to the west.

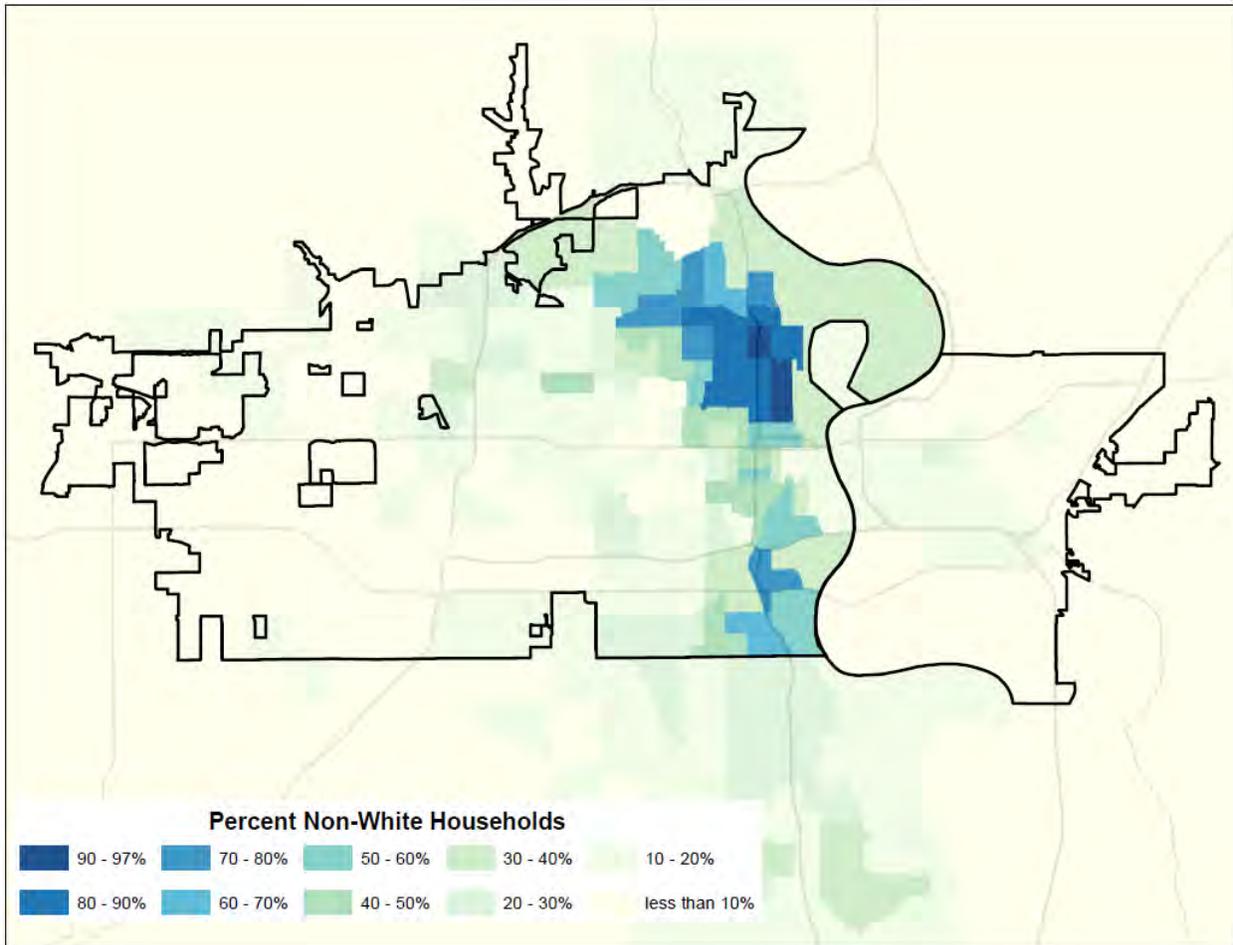
Figure V -86 Omaha Race/Ethnicity and Low Poverty Index



Source: HUD Map 12 Race/Ethnicity, Dot Density 1:25

When focusing in on Northeast and Southeast Omaha, where the census tracts with the lowest Low Poverty Index scores are found, the demographics layers show how protected classes are impacted. Minority and LEP households are found in greater numbers in the census tracts with the lowest index scores. These protected classes have less access to low poverty neighborhoods than the majority white neighborhoods in the western portion of the City.

Figure V -87 Omaha Neighborhood Diversity

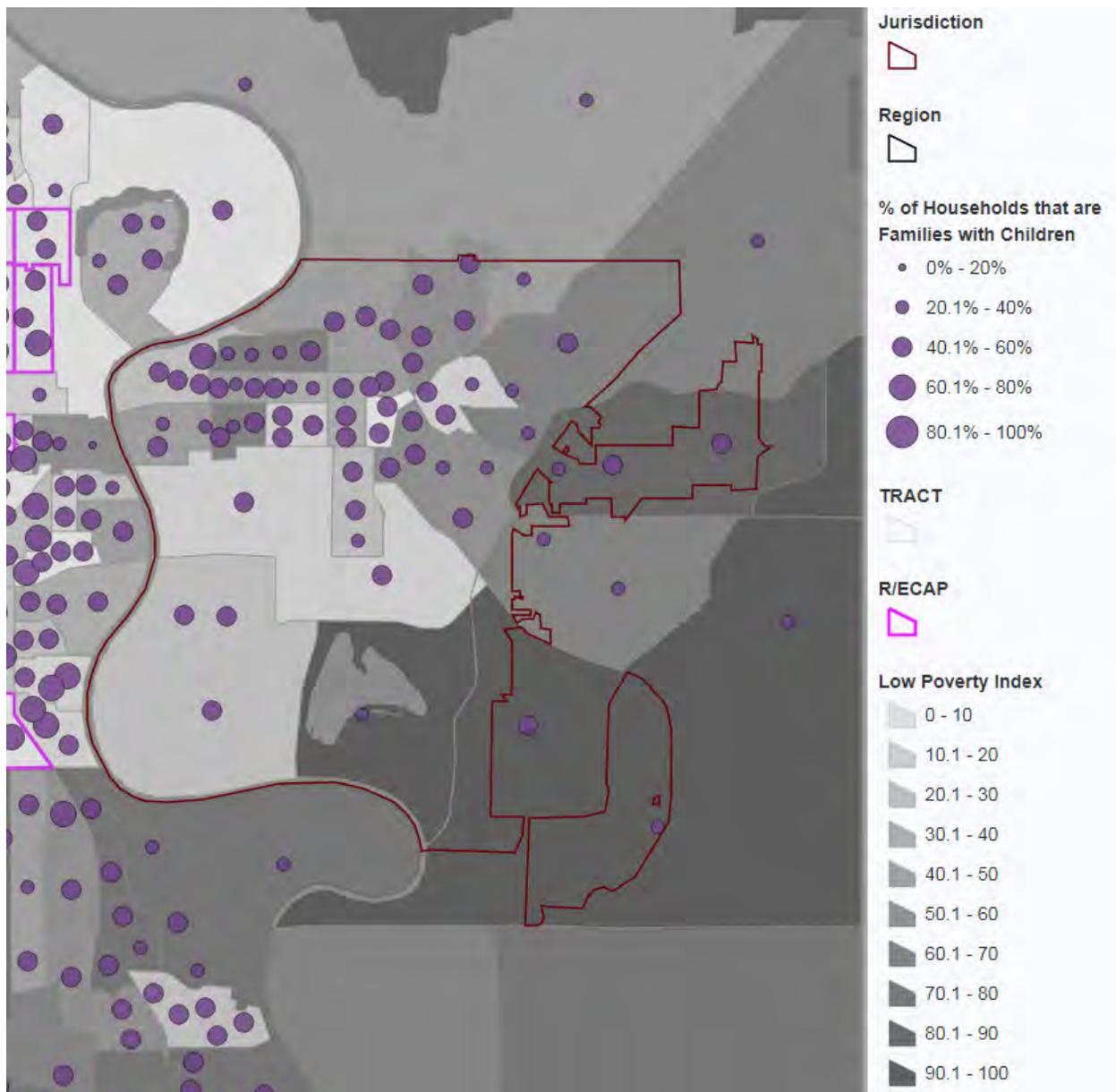


Source: 2014 American Community Survey (ACS) Data

As mentioned in the Segregation/Integration section above, mapping census tracts by percentage of white versus non-white residents reveals where the most homogenous neighborhoods are located in Omaha, and those with the most diversity. The same neighborhoods to the far West of Omaha with less than 10% of minority households also have the highest index for low poverty. Similarly, those neighborhoods to the far Northeast and Southeast have the lowest index for low-poverty.

COUNCIL BLUFFS

Figure V -88 Council Bluffs Low Poverty Index and Family Status



Source: HUD Map 12 Low Poverty Index

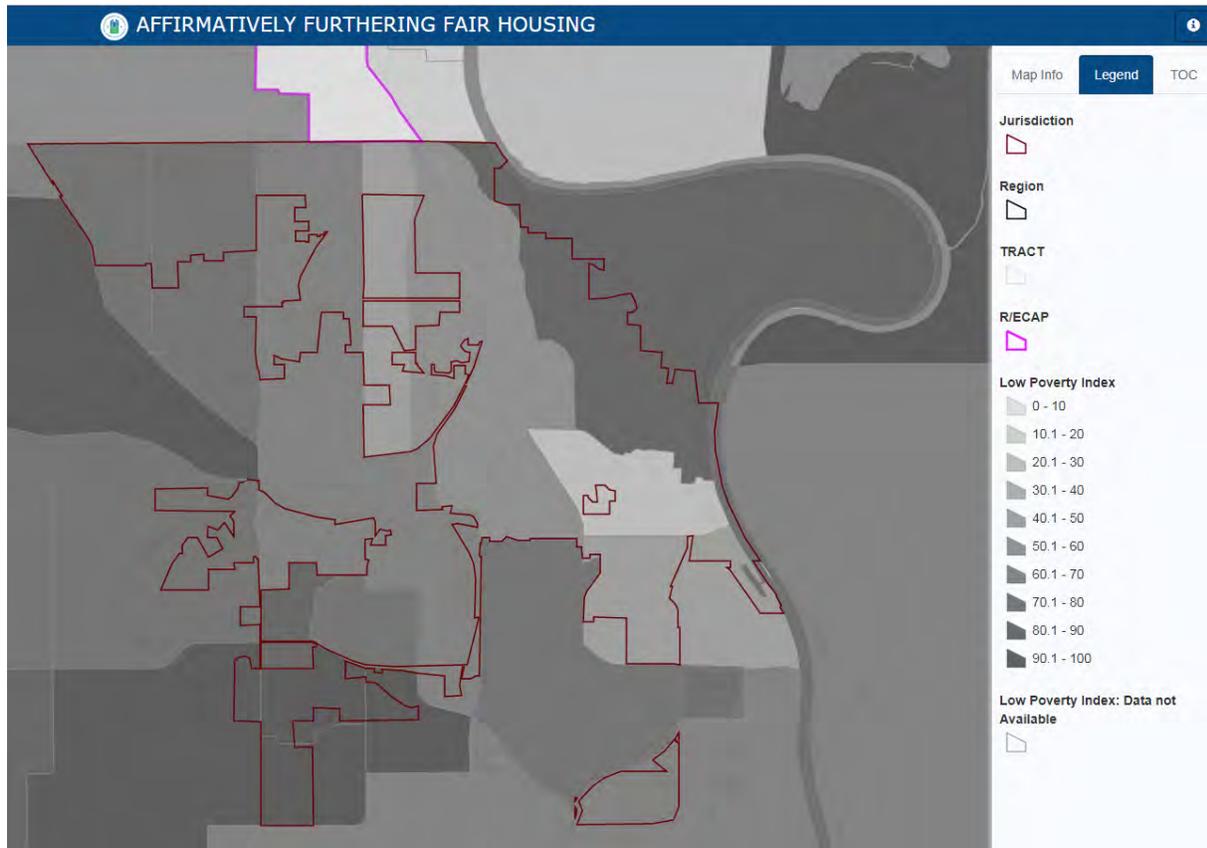
Map 12 shows the disparities in access to high poverty neighborhoods. In Council Bluffs, the highest poverty neighborhoods are located in US Census Tracts 306.02, 309, 311 and 313, which range in poverty index from 7 to 18. These census tracts include Mid-City, the West End, the South End and a small portion of the East End. These areas primarily consist of White/Non-Hispanic because Council Bluffs has a very low diversity rate. For national origin, there are small clusters of native Mexicans within Census

Tracts 311 and 306.02. Additionally, 40-60% of the households have children, which suggests a large number of children within these census tracts are living at or below the federal poverty line.

BELLEVUE

HUD AFFH Map 12 show values for the Low Poverty Index with shading at the census tract level.

Figure V -89 Bellevue Low Poverty Index



Source: HUD Map 12 Low Poverty Index

Bellevue has one area of low poverty in southeast Olde Towne area. The families with children and all race and ethnicities face living in neighborhood in high poverty. Most families with children live in areas of low poverty

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to low poverty neighborhoods.

OMAHA

A contributing factor to fair housing identified through HUD information, local data, and the community engagement, is the location and lack of affordable housing in Omaha. Most low poverty census tracts are located in West Omaha. The lack of affordable housing to the west of 72nd Street limits the ability of some protected classes currently located in R/ECAP areas from accessing low poverty neighborhoods. The concentration of affordable housing east of 72nd also limits persons in the disability community who are on Supplemental Security Income (SSI) and/or elderly persons on fixed income from having more housing choice.

As mentioned in previous sections, growth patterns westward based on geographic boundaries and policies within Sanitary Improvement Districts (SIDs) contribute to the development of new and high end housing in the western portion of the city. Additional codes mentioned in Segregation/Integration (Section 2e), requiring developers to hold meetings with stakeholders including neighborhoods on projects that include affordable housing may create barriers to the addition of new low-income or mixed-income developments in the western portion of the city.

An activity incorporated into community open houses held across the city included a station where residents could select solutions for housing issues identified in their area. The "creation of more mixed income neighborhoods" was a solution that residents chose to solve the following issues:

- Concentration of racial and ethnic minorities in low income communities
- Discrimination/institutional racism
- High quality schools not equally distributed throughout the region

The diversity of neighborhoods in regards to race/ethnicity as well as socioeconomic diversity, was also a key topic discussed among professionals and community stakeholders at a Housing Affordability Workshops hosted in January and February by the Douglas County Health Department.

COUNCIL BLUFFS

Council Bluffs has 36 block groups in 15 census tracts that meet HUD’s definition of high concentration low-to-moderate income households. From a neighborhood perspective, the north end and east end have the fewest number of high-poverty block groups with only five in the north end and one in the east end. The west end and mid-city/Kanesville-Tinley, downtown and bluff-willow neighborhoods have the highest number of qualified block groups. Between these two areas, only 10 block groups do not meet the definition.

Table V-34 High Poverty Census Tracts by Neighborhood

North End			South End			East End			West End			Mid-City/Kanesville-Tinley, Downtown, Bluff-Willow			Industrial Area, Twin-City/Malmore, Lake Manawa		
Census Tract	Block Group	% Low-Mod	Census Tract	Block Group	% Low-Mod	Census Tract	Block Group	% Low-Mod	Census Tract	Block Group	% Low-Mod	Census Tract	Block Group	% Low-Mod	Census Tract	Block Group	% Low-Mod
30100	1	47%	30800	1	60%	31100	1	40%	30500	1	61%	30700	1	87%	31300	1	69%
30100	2	77%	30800	2	45%	31100	2	42%	30500	2	67%	30700	2	46%	31300	2	76%
30100	3	16%	30800	3	53%	31100	3	65%	30300	3	39%	30700	3	82%	31400	1	54%
30100	4	20%				31200	1	40%	30300	4	34%	30700	4	42%	31400	2	85%
30100	5	49%				31200	2	35%	30401	1	62%	30900	1	99%	31400	3	44%
30200	1	36%				31200	3	32%	30401	2	62%	30900	3	91%	31900	1	10%
30200	2	57%				31601	1	39%	30401	3	40%	31000	1	52%	31900	2	53%
30200	3	66%				31601	2	16%	30401	4	70%	31000	2	35%	31900	3	64%
30200	4	67%				31601	3	14%	30402	1	62%	31000	3	41%	31900	4	16%
31700	1	33%				31602	1	19%	30402	2	42%						
31700	2	83%				31602	2	27%	30402	3	58%						
31700	3	11%							30501	1	52%						
31700	4	41%							30501	2	34%						
31800	1	19%							30501	3	60%						
31800	2	42%							30502	1	58%						
31800	3	9%							30502	2	44%						
									30502	3	63%						
									30601	1	62%						
									30601	2	49%						
									30601	3	68%						
									30602	1	63%						
									30602	2	61%						
									30602	3	72%						

Source: HUD 2017 LMISD by State, 2006-2010 ACS

Many comments during the public comment period surrounded availability of affordable housing in a range of sizes in all areas of the city. This included rental and owner occupied. Voucher holders stated they cannot find housing large enough within their budget in areas they wish to live. According to the American Community Survey, there are only 653 units in Council Bluffs with five or more bedrooms (2.4%). This significantly hinders large families from finding affordable housing that suits their needs. Approximately 17% of households have four or more persons.

Access to housing in the Lewis Central Community School District was also discussed by families of low-to-moderate income. Located in the east end, housing in the district is typically more expensive and in low-poverty neighborhoods. While most comments

were not provided by protected classes, the overwhelming request for more affordable housing would benefit all residents of Council Bluffs.

BELLEVUE

Examination of the conditions of poverty in Bellevue is also necessary to understand fair housing opportunities in the city. When comparing poverty rates in Bellevue to those in state, Bellevue poverty rates are relatively low in all categories except in the female head of household and related children under 18 years of age, which could be related.

Table V-35 Poverty by Category

Category	Bellevue (%)	Nebraska (%)	National (%)
Age 65 and older	4.7	7.8	9.4
All Families	8.0	8.7	11.3
Families with Female Head of Household	27.2	30.3	30.6
Related children under 18 years of age	15.2	16.6	18.0
All categories	11.3	12.7	15.5

Source: 2010-2012 ACS

Bellevue has 10 census tracts spread through the city limits that meet HUD definition of a high concentration low- to moderate-income census block group, which is a census tract in which 51 percent or more of the residents are low- to moderate-income. The below a table presents data on LMI areas of Bellevue and a map shows the areas described. The map shows each census tract as a different color with each low and moderate income block groups outlined in red.

Figure V -36 . LMI Census Tracts & Block Groups within the City of Bellevue

Census Tract	Block Group	Total Population	LMI Population	% LMI
101.04	2	1,105	685	61.99 %
101.06	4	530	435	82.08 %
101.06	5	680	515	75.74 %
101.07	1	1,635	1,170	71.56 %
101.08	1	845	710	84.02 %
102.04	1	925	690	74.59 %
103.05	1	215	115	53.49 %
103.05	3	750	435	58.00 %
103.06	1	650	350	53.85 %
103.05	2	345	185	53.62 %
104.02	4	970	525	54.12 %
105.01	1	955	615	64.40 %
105.02	2	1,335	905	67.79 %
105.03	3	420	220	52.38%

Source: HUD 2017 LMISD by State, 2006-2010 ACS

e. Access to Environmentally Healthy Neighborhoods

i. For the protected class groups HUD has provided data, describe any disparities in access to environmentally healthy neighborhoods in the jurisdiction and region.

Figure V -37 Regional Environmental Health Index

(Omaha-Council Bluffs, NE-IA) Region	
Total Population	
White, Non-Hispanic	67.73
Black, Non-Hispanic	57.01
Hispanic	56.19
Asian or Pacific Islander, Non-Hispanic	62.38
Native American, Non-Hispanic	58.61
Population below federal poverty line	
White, Non-Hispanic	60.40
Black, Non-Hispanic	53.91
Hispanic	52.29
Asian or Pacific Islander, Non-Hispanic	52.11
Native American, Non-Hispanic	50.85

Source: HUD Table 12 Opportunity Indicators by Race/Ethnicity

Through the Affirmatively Furthering Fair Housing Data and Mapping Tool, HUD has provided Environmental Health Indicator (“EHI”) scores for use in this study. The scores are on a scale of 0 to 100. Higher scores are meant to reflect greater the access to environmentally health neighborhoods. According to Table 12 – Opportunity Indicators, by Race/Ethnicity, the average EHI score for people living within the Omaha-Council Bluffs Region is 60.38, which is higher than average scores for the Omaha, Council Bluffs, and Bellevue. The region includes many rural, less-populated areas, which generally have higher EHI scores.

Across the region, Asian or Pacific Islander, Non-Hispanic group shows the largest difference in scores between Total Population and Population Below Federal Poverty Line (10.27 points), and the Black, Non-Hispanic Group shows the smallest difference in

scores (3.1). The Native American, Non-Hispanic group has the lowest EHI score (50.85) for Population Below the Federal Poverty Line. The Hispanic group has the lowest EHI score (56.19) for Total Population. The White, Non-Hispanic group has the highest EHI score (67.73) for Total Population, and the highest EHI score (60.40) for Population Below Federal Poverty Line. The White, Non-Hispanic group is also the largest population in most Census tracts with higher EHI scores within the region.

OMAHA

Table V-38 Omaha Council Bluffs Consortium Environmental Health Index Scores

(CNSRT-Omaha, NE CONSORTIA) Jurisdiction	Environmental Health Index
Total Population	
White, Non-Hispanic	59.75
Black, Non-Hispanic	55.24
Hispanic	51.96
Asian or Pacific Islander, Non-Hispanic	58.87
Native American, Non-Hispanic	52.65
Population below federal poverty line	
White, Non-Hispanic	52.71
Black, Non-Hispanic	53.40
Hispanic	49.19
Asian or Pacific Islander, Non-Hispanic	47.38
Native American, Non-Hispanic	49.12

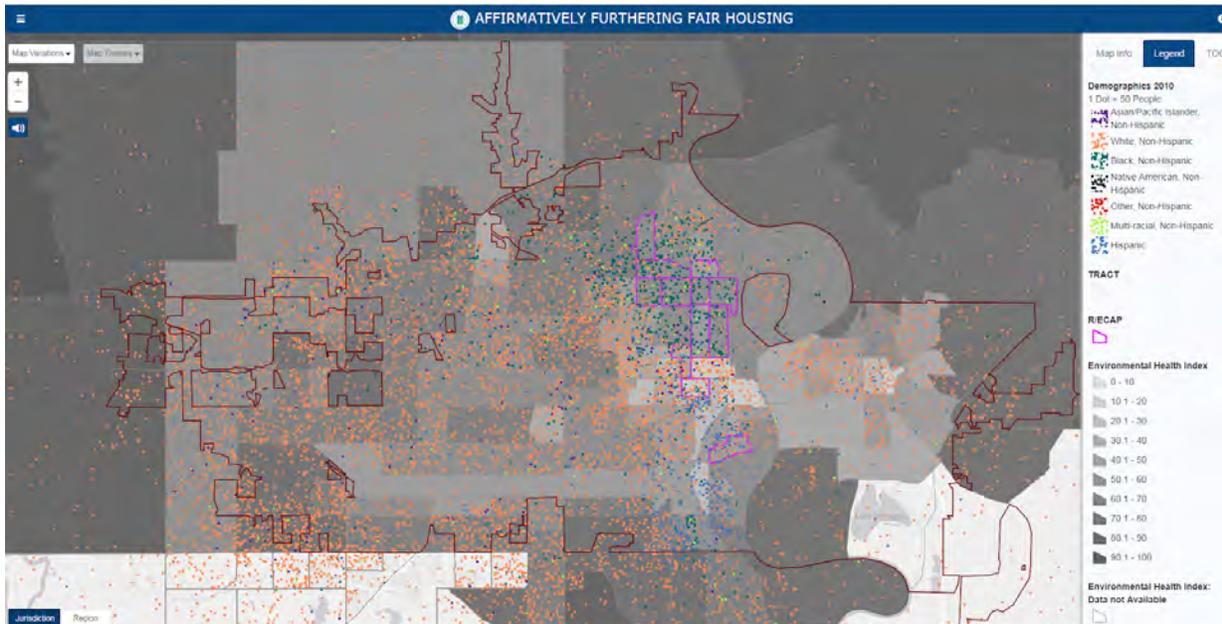
HUD Table 12 Environmental Health Index Scores

Within the jurisdiction, the EHI scores between Total Population and Population Below Federal Poverty Line vary. The Asian or Pacific Islander, Non-Hispanic group shows the largest difference between scores (11.49 points). This may be due to the large number of Asian refugees living within Census tracts 16, 18, 43, 48, 49, and 52 which have fairly low EHI scores. The Black, Non-Hispanic group shows the smallest difference between scores (1.84 points), and this may be due to the concentration of the Black population in

northeastern Omaha. The census tracts in that area do not show significant fluctuations in the EHI scores.

The Asian or Pacific Islanders, Non-Hispanic group has the lowest EHI score (47.38) for Population Below Federal Poverty Line. The Hispanic group has the lowest EHI score (51.96) for Total Population. The White, Non-Hispanic group has the highest EHI score (59.75) for Total Population, while the Black, Non-Hispanic group has the highest EHI score (53.40) for Population Below Federal Poverty Line.

Figure V -91 Omaha Jurisdiction Environmental Health Index



Source: HUD Map 13 Demographics and Environmental Health

Within both the jurisdiction and region, the Hispanic and Native American groups have low EHI scores. The White, Non-Hispanic groups scores the highest. It is the highest scoring group for Total Population within the jurisdiction and region, the highest scoring group Population Below Federal Poverty Line in the region, and second highest in the jurisdiction.

COUNCIL BLUFFS

Environmental health index numbers for the City of Council Bluffs range from 15 to 76. The area with the lowest health index is Census tract 309 with a score of 15. This area includes the historic 100 Block to the east, South 8th Street on the west, Mill Street to

the north and 9th Avenue to the south. Census tract 309 includes some of the poorest neighborhoods in Council Bluffs.

West End areas and neighborhoods adjacent to US Interstate 80 also have lowered environmental health ratings, which range from 35 to 44. These corresponding census tracts are outlined above as having higher concentrations of low-to-moderate income families and families living in poverty.

Table V-39 Environmental Health Index by Race/Ethnicity

(Council Bluffs, IA CDBG) Jurisdiction	Environmental Health Index
Total Population	
White, Non-Hispanic	46.19
Black, Non-Hispanic	45.05
Hispanic	40.68
Asian or Pacific Islander, Non-Hispanic	44.01
Native American, Non-Hispanic	42.51
Population below federal poverty line	
White, Non-Hispanic	43.61
Black, Non-Hispanic	50.19
Hispanic	45.52
Asian or Pacific Islander, Non-Hispanic	44.00
Native American, Non-Hispanic	47.65

Source: HUD Table 12 Opportunity Indicators by Race/Ethnicity

Table 12 provides information on the environmental health index for the City as well as the region. The health index for Council Bluffs and the metropolitan area is similar across the board for all racial/ethnic groups.

BELLEVUE

The Environmental Health Index in HUD AFFH Table 12 measures exposure based on EPA estimates of air quality, carcinogenic, respiratory, and neurological toxins by neighborhood. All of the scores for individuals' racial and ethnic groups are relatively close to each other, with no one group appearing to be affected more by environmental issues.

Figure V -40 Bellevue Environmental Health Index

Population	Environmental Health Index	
	Bellevue	Omaha – Council Bluffs
Total Population		
White, Non-Hispanic	70.70	63.71
Black, Non-Hispanic	68.97	55.70
Hispanic	69.76	53.40
Asian or Pacific Islander, Non-Hispanic	68.96	58.49
Native American, Non-Hispanic	69.74	55.25
Population below federal poverty line		
White, Non-Hispanic	66.78	56.50
Black, Non-Hispanic	59.82	53.02
Hispanic	69.98	50.32
Asian or Pacific Islander, Non-Hispanic	69.74	49.61
Native American, Non-Hispanic	71.49	48.97
Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA		

Source: HUD Table 12 Opportunity Indicators by Race/Ethnicity

The Environmental Health Index in HUD Table 12 measures exposure based on EPA estimates of air quality, carcinogenic, respiratory, and neurological toxins by

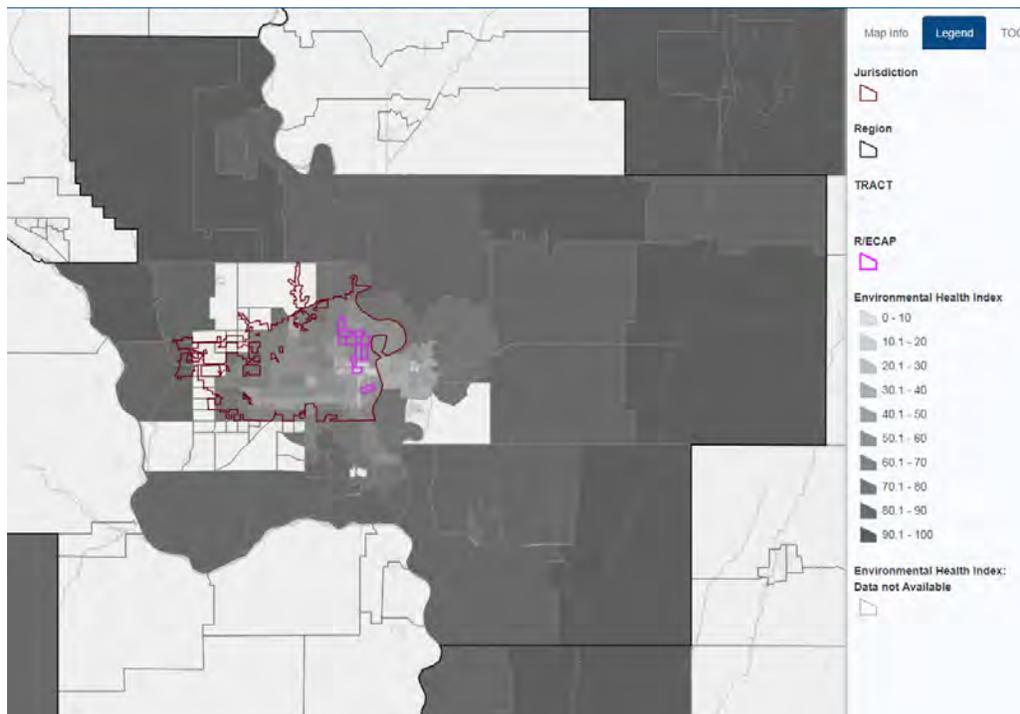
neighborhood. All of the scores for individuals' racial and ethnic groups are relatively close to each other, with no one group appearing to be affected more by environmental issues. Bellevue appears to have greater opportunity for access to environmental health index when compared to the region as a whole. The Omaha-Council Bluffs region areas to be 10 to 20 points lower than the Bellevue community.

ii. For the protected class groups HUD has provided data, describe how disparities in access to environmentally healthy neighborhoods relate to residential living patterns in the jurisdiction and region.

OMAHA

HUD Map 13 is generated from HUD's Affirmatively Furthering Fair Housing Data Mapping Tool. On this map, Census tracts are color coded in shades of gray by their EHI score. According to HUD, "the Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory and neurological toxins by neighborhood."

Figure V -92 Regional Environmental Health Index



Source: HUD Map 13 Demographics and Environmental Health; 2010 Census EHI scores are based on a scale of 0 to 100 points. Darker shaded census tracts have higher (better) scores, while lighter shaded areas have a lower (worse) scores. Areas

without shading do not have an EHI value. This is probably due to a lack of data with which to calculate a score.

Census tracts with darker shading, indicating higher EHI scores, tend to be furthest from the urban core (i.e., Omaha and Council Bluffs) and are rural in nature. Although there are environmental hazards present in these areas, such as farm chemicals, lead-based paint hazards, and emissions from transportation routes, they are not frequently occurring. Urban areas tend to have more emissions, more hazards, and more people who may be exposed to health risks.

Figure V - 93Omaha 2010 R/ECAP Environmental Health Index



Source: HUD Map 13 Demographics and Environmental Health; 2010 Census

Also visible on this map (in magenta) are the 12 R/ECAP Census tracts within the jurisdiction and region. A close up view of that area is presented at left. All twelve areas are located in Omaha, Nebraska, and most of those are located in an area referred to as North Omaha.

Table V-41 Environmental Health Index for R/ECAP Census Tracts

R/ECAP Census Tract	EHI	R/ECAP Census Tract	EHI
006101	60	000800	60
006000	52	001100	43
000600	42	001200	55
005901	60	005100	31
005902	60	004000	18
000700	53	002400	50

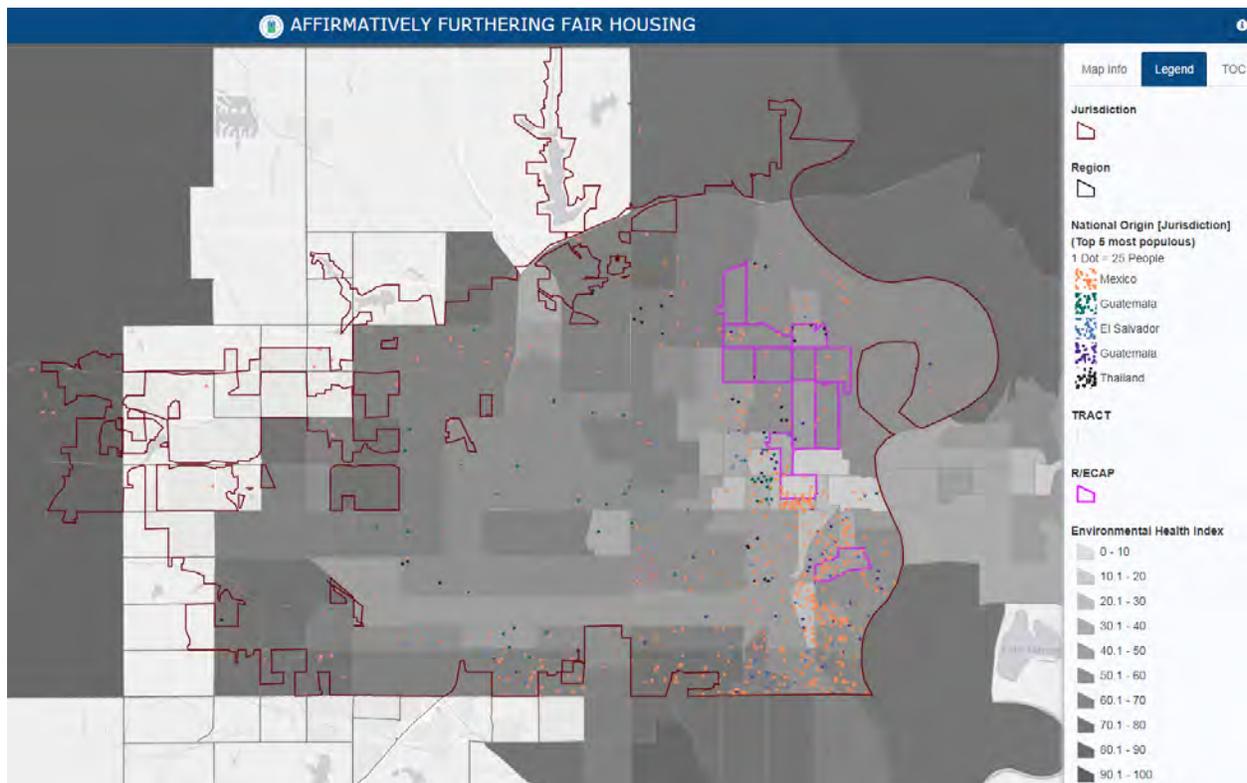
Source: HUD Map 13

Based on visual observation, the EHI scores of the twelve R/ECAP Census tracts are generally consistent with EHI scores for the adjacent non-R/ECAP Census tracts, as well as Census tracts within the urban areas in the region. However, no R/ECAP Census tract scores higher than 60 points (as may be seen on the table presented below), while some non-R/ECAP Census tract exceed 80 points and a few score more than 90 points.

In general, Census tracts located closer to Omaha’s Central Business District, and areas with a commercial, civic, or industrial focus score more poorly than areas with a residential or rural character. In Omaha, major transportation routes such as Interstates and railroad lines also appear to be a factor in restricting high EHI scores. Census tracts with older housing stock, including much of eastern Omaha and most of Council Bluffs, appear to have lower scores than those in western Omaha, Sarpy County and portions of Council Bluffs, which generally have newer housing stock and have been heavily developed over the past 20 to 30 years.

In general, Black, Non-Hispanic and Hispanic populations are focused eastern Omaha. The following map shows that in north Omaha specifically, the Black population is focused in R/ECAP Census tracts. The southern two R/ECAP Census tracts are predominantly a mix of White, Non-Hispanic and Hispanic populations. The lowest scoring R/ECAP Census tract is predominantly White, Non-Hispanic.

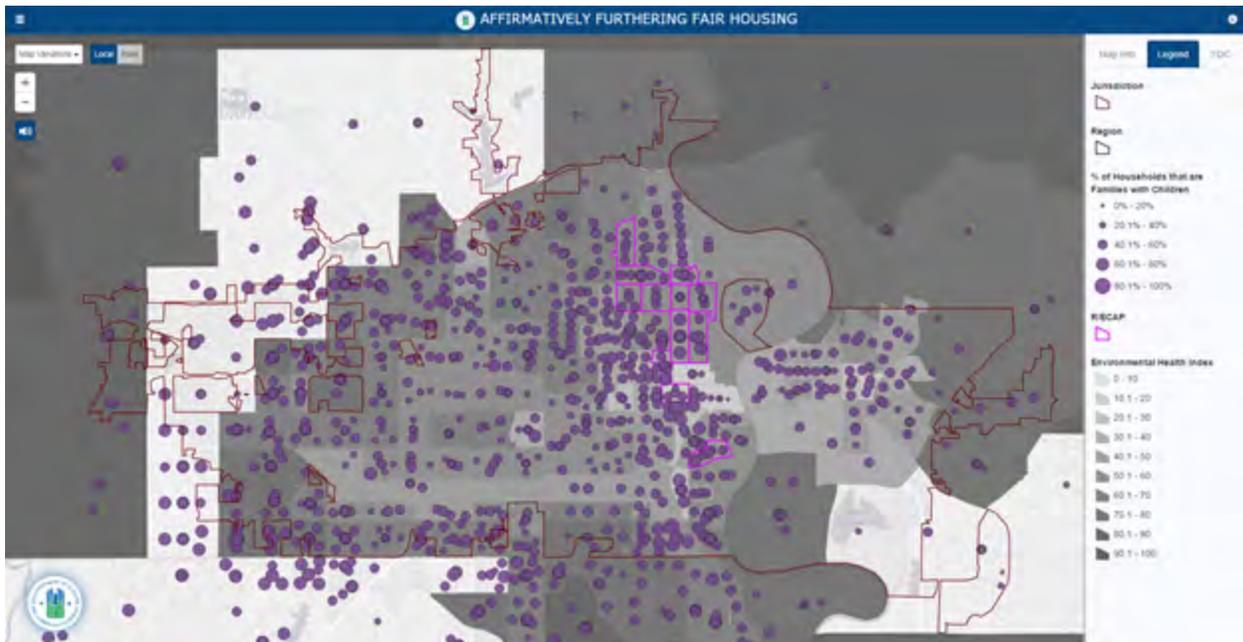
Figure V -94 Omaha National Origin and Environmental Health Index



Source: HUD Map 13 Demographics and Environmental Health; National Origin, 2010 Census Data, Dot Density 1:25

A majority of the population in all R/ECAP Census tracts was born in the United States of America. According to the following map, Mexico is the most common point of origin for people of foreign birth. The orange dots on the following map are representative of Mexican origin. Two of the R/ECAP Census tracts have sizeable populations from Mexico, equaling about 17 and 28 percent of each total population. One of the R/ECAP Census tracts has a small, but significant population from Thailand, representing 9 percent of the population.

Figure V-95 Omaha Family Size and Environmental Health Index



Source: HUD Map 13 Demographics and Environmental Health, Family Size

In the R/ECAP Census tracts, 40 to 80 percent of households are families with children, according to the map presented below. These numbers are generally consistent with those of adjacent non-R/ECAP Census tracts, but higher overall than many parts of the jurisdiction, specifically central Omaha.

However, these maps do not tell the tale of three interrelated issues, lead hazards, asthma triggers, and housing maintenance, which do create a disparity in access to healthy neighborhoods. Exposure to lead hazards, poor housing maintenance, and asthma triggers are significantly higher in eastern Omaha where there is older housing stock, fewer families with resources with which to maintain their homes, less education about home maintenance, fewer land lords engaged in active property maintenance, more industries, more transportation routes, and a more densely built environment. These same areas contain Omaha's R/ECAP, and highest concentrations of minority households.

COUNCIL BLUFFS

Map 13 outlines environmental health as related to race/ethnicity, national origin, and familial status. For race/ethnicity, census tracts in the west end, mid-city and south end have the highest proportion of Hispanic families compared to other areas of the City. Additionally, they are the areas with the highest number of LEP families and are average for family size. These areas also have the highest environmental health risk as they are near major thoroughfares and industrial areas.

BELLEVUE

HUD AFFH Map 13 shows the values for the Environmental Health Index with shading at the census tract level indicating levels of exposure to environmental health hazards. Data for one census tract is unavailable, but contains no environmental concerns that would be separate from the surrounding neighborhoods.

Those races, ethnicities and families with children living in southwest Bellevue in the Olde Towne area appear to have very slightly lower access to environmental healthy neighborhoods than the rest of the community.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to environmentally healthy neighborhoods.

The Regional Fair Housing survey, sought to identify environmental issues that are concerning to residents by asking the question, "Do you have concerns about any of the following environmental issues at your residence? Select all that apply." Options given as a selection choice included: lead, mold, asbestos, air quality indoor, air quality outdoor, radon, noise, insects, rodents, illegal dumping, working utilities (water, electricity, gas, trash, etc.), and other. Respondents identified their top five concerns as follows, listed in the order they were prioritized:

- Insects
- Radon
- Mold
- Noise
- Lead

In the other category, the most common responses among residents listed were water quality and vehicle noise.

Residents were also asked “Have you experienced any health issues related to environmental health issues?” Out of the 1,323 respondents that chose to answer this question, 7.74% (102 persons) responded, “yes.” Over half of these respondents stated that they have asthma issues, followed by COPD and allergy issues they associate with environmental impacts.

Additionally, when surveyed, “In the last 5 years, did you knowingly move into an environmentally unhealthy neighborhood or residence because you could not afford to move into an environmentally healthy neighborhood or residence?” 4.72% or 62 persons who answered the question said “yes.”

The maps and tables provided by HUD are based on the EPA’s National Air Toxics Assessment (NATA). This assessment is conducted by collecting data on air toxics that are released outdoors. This presents limitations to how the data should be used, as EPA acknowledges (<https://www.epa.gov/national-air-toxics-assessment/nata-limitations>). Although the NATA may provide a more reliable regional look at the air quality, it is not useful for comparing nearby neighborhoods to one another. In addition the HUD Environmental Health Index data would not include some of the more prevalent environmental challenges that region faces which may disproportionately affect lower-income areas such as lead in the soil or proximity to Brownfields.

OMAHA

As a part of our stakeholder and community meetings, the majority of comments raised in regards to environmental issues were related to concerns over the quality of rental housing and elderly housing. Many neighborhoods East of 72nd have older housing stock which is deteriorating. Issues with lead paint and asbestos provide a challenge in safety/health as well as housing rehab.

Additionally Omaha has the largest superfund site in the country that is located within a residential area. HUD and EPA resources have assisted the City and County, as well as non-profit organizations such as Omaha Healthy Kids Alliance to address lead hazards in homes and yards across the superfund site.

The Omaha Lead Site was designated as a superfund site in 1999 due to high levels of lead contamination in soil resulting primarily from lead smelting and refining at the ASARCO facility from the late 1800s until the mid-1990s. The EPA added the Omaha Lead Superfund Site to the National Priority List in 2003. The boundaries of the Final

Focus area are defined as south of Read Street, north of the Sarpy County Line (Harrison Street), and east of 56th Street to the State line. The site is defined as the residential properties that became contaminated with lead above health-based levels as a result of historic emissions due to lead processing (USEPA, 2009). The primary source of contamination was from aerial deposition of lead particles from smelting and refining activities located in downtown in Omaha.

(SOURCE: EPA, 2009, Omaha Lead Site, Operable Unit 02, Final Record of Decision, EPA Region 7, May 13, 2009.)

Table V-42 EPA Timeline of Events for Omaha Lead Superfund Site

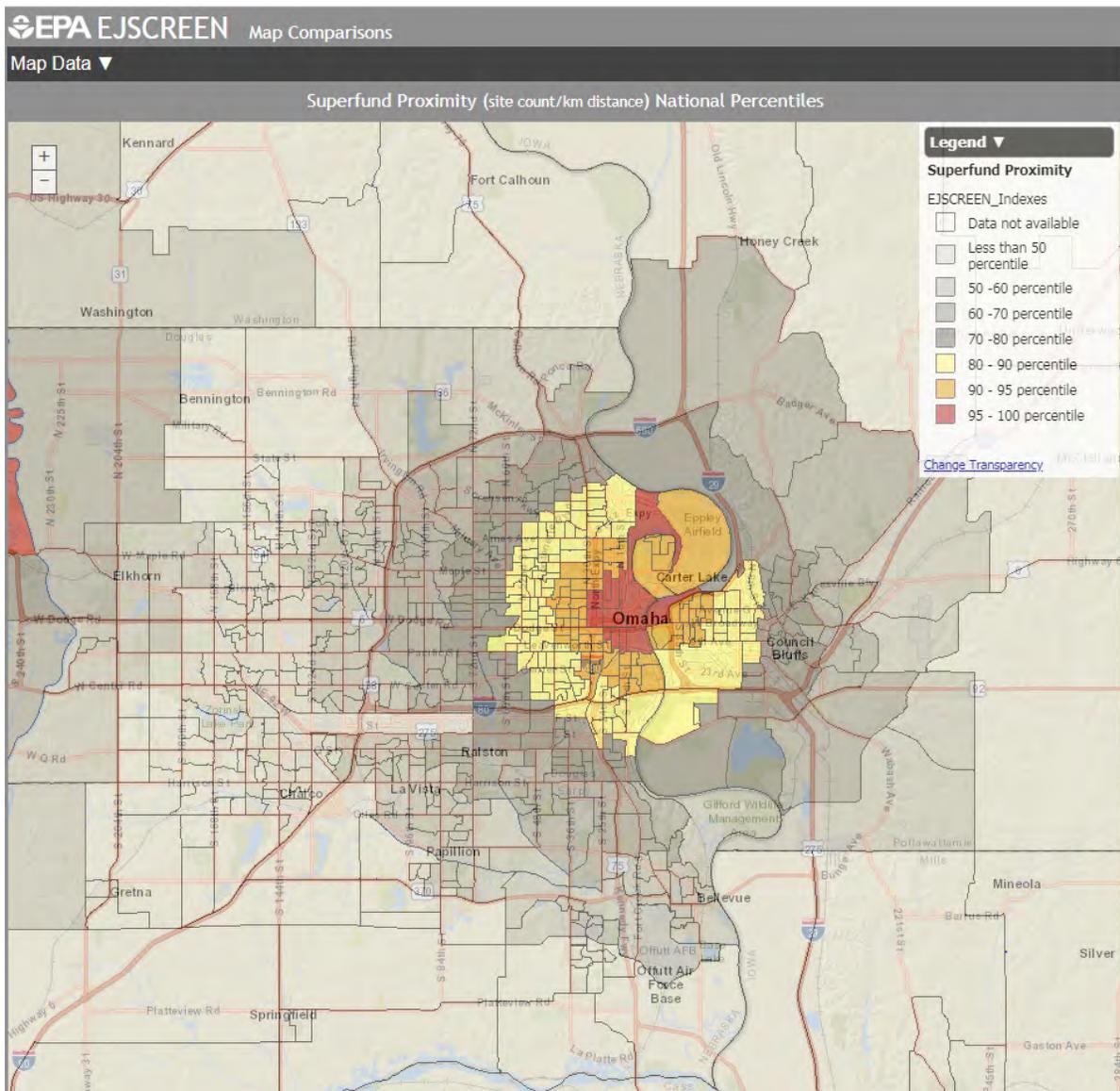
1998	The Omaha City Council sent a letter to EPA requesting assistance to address the high incidence of elevated blood lead levels found in children.
March 1999	EPA began collecting soil from residential properties being used as child day-care facilities.
August 1999	EPA entered into several interagency agreements with the US Army Corps of Engineers to conduct Time Critical Removal Actions at more than 250 properties. EPA also issued a Unilateral Order to ASARCO.
April 2003	Omaha Lead Superfund Site listed on the National Priority List (NPL).
December 2004	EPA issued an Interim Record of Decision
May 2009	EPA issued the Final Record of Decision
June 2009	Settlement of the court case with ASARCO for more than \$200 million
December 2015	EPA completed the cleanup of 13,090 residential properties
Ongoing	The City of Omaha and Douglas County Health Department continue efforts to address lead contamination issues at the remaining properties where the owner was not willing to grant access to collect soil samples or clean up lead contaminated soil.

Source: EPA Superfund Site Cleanup Activities; Omaha <https://cumulis.epa.gov/supercpad/SiteProfiles>

The final focus site is completely East of 72nd Street which also contains all of Omaha's R/ECAP areas and the majority of housing stock built prior to 1960.

Additional information on EPA environmental indicators can be viewed on EJSCREEN, the EPA's Environmental Justice Screening and Mapping Tool (<https://ejscreen.epa.gov>). For example, the map below ranks census tracts based on the the distance of the total population from superfund sites on the National Priorities List.

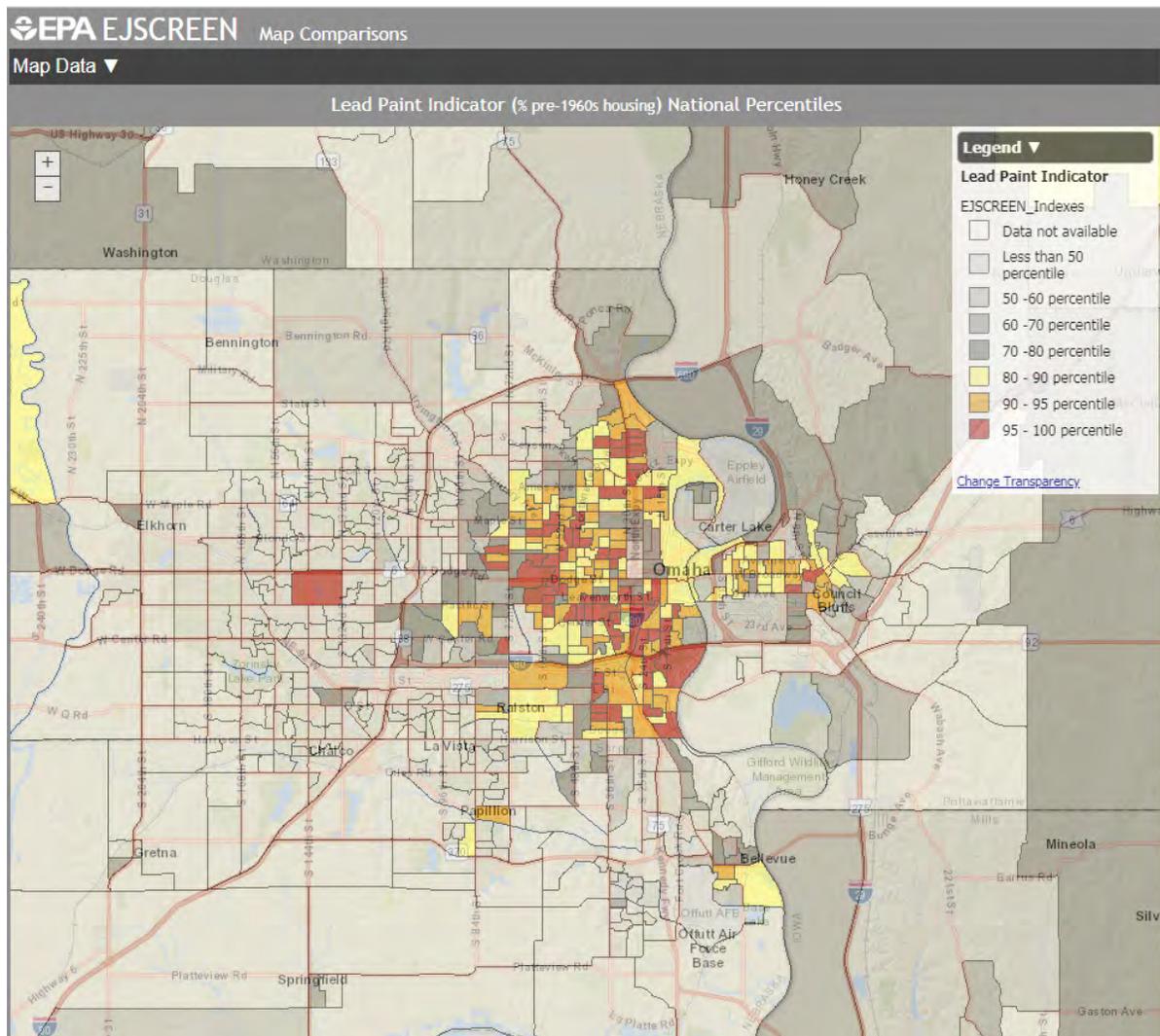
Figure V -96 Omaha Superfund Proximity Index



Source: EJSCREEN Maps, Environmental Indicators, Superfund Proximity

The Lead Paint Indicator is another index, that rates the risk of exposure to lead paint based on the age of the housing stock (pre-1960). The map below indicates that the risks are again greater to the East of 72nd Street.

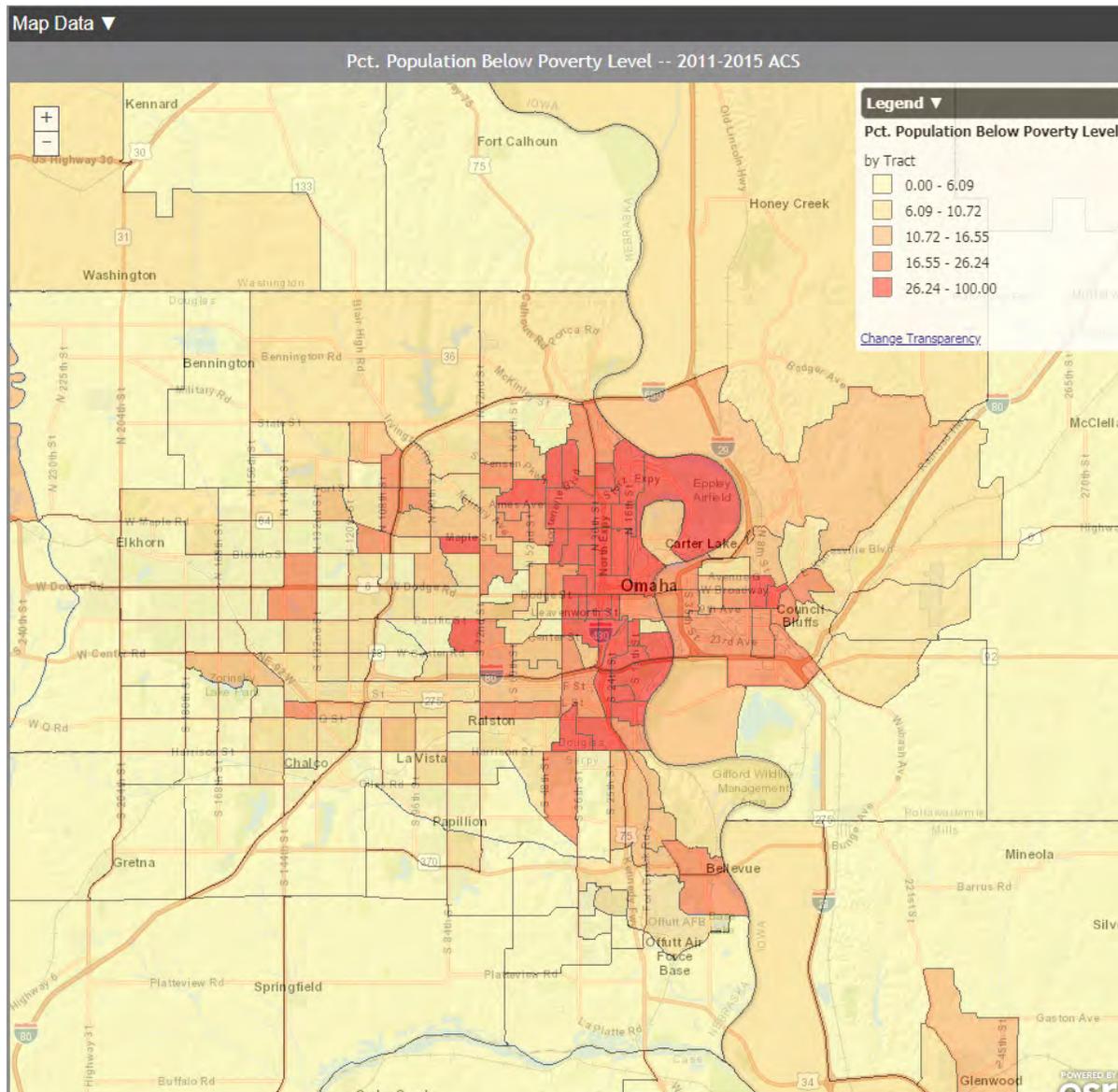
Figure V -97 Omaha EPA Lead Paint Indicator



Source: EJSCREEN Maps, Environmental Indicators, Lead Paint Indicator

When comparing these environmental indicators for the population in Omaha living below the poverty level, it indicates that areas with the highest poverty are also neighborhoods with the highest risk of exposure to lead. Residents and especially children in these areas are at a greater risk for lead poisoning. Efforts to provide education and resources to families in Eastern Omaha are ongoing.

Figure V -98 Omaha Population Below Federal Poverty Level



Source: EJSCREEN Maps, Income/Poverty, Population Below Poverty Level

For more information on EJ Indexes go to:

<https://www.epa.gov/ejscreen/overview-environmental-indicators-ejscreen>

COUNCIL BLUFFS

Leaky Underground Storage Tanks: The City of Council Bluffs has 164 underground storage tanks according to the Iowa Department of Natural Resources (IDNR). Of

these, 16 are considered “high risk,” six are considered “low risk,” 138 are considered “no action required” and four are not classified. Of the 16 that are “high risk,” they are located throughout the City with concentrations along the business and industrial corridors. These areas align with the West End, South End, Mid-City and Downtown neighborhoods.

Lead Nonattainment Area: In 2008, the area bounded by Avenue G on the north, N 16th/S 16th street on the east, 23rd Avenue on the south, and N 35th/S 35th street on the west was designated a lead nonattainment area. This section encompasses Census Tracts 304.01, 304.02, 305.01, 305.02, 306.01, and 306.02. As stated previously, these census tracts are overwhelmingly low-to-moderate income and represent the City’s cluster of minority population.

Radon: The Iowa Radon Survey found that Iowa has the largest percentage (71.6 percent) of homes with radon levels above the EPA action level of 4 picocuries per liter (pCi/L) of any state, according to the Iowa Department of Public Health website. The national average for indoor radon levels is 1.3 picocuries per liter, while Iowa’s average is 8.5 pCi/L. Radon causes an estimated 21,000 lung cancer deaths a year in the United States, making it the second-leading cause of lung cancer (after tobacco use). It is the leading cause of lung cancer for nonsmokers.

Brownfields: Because of Council Bluffs’ industrial history, the City has several brownfield sites throughout the community. Most industrial uses were located in the Mid-City and West End neighborhoods, which align with some of the most impoverished areas in Council Bluffs. The City has worked closely with the US Environmental Protection Agency (EPA) and the Iowa Department of Natural Resources (IDNR) to identify brownfield redevelopment sites and complete cleanup activities. To date, the City has spent over \$1.4 million in EPA grant dollars to complete site assessments and cleanups.

BELLEVUE

Quality of neighborhood environmental health is similar for all racial and ethnic group. As with the Labor Market Engagement and Poverty concentration, Blacks living below the poverty line are more likely to face a higher risk of exposure to environmental health concerns.

f. Patterns in Disparities in Access to Opportunity

i. For the protected class groups HUD has provided data, identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors. Include how these patterns compare to patterns of segregation, integration, and R/ECAPs. Describe these patterns for the jurisdiction and region.

Table V-43 NE-IA Regional Opportunity Indicators by Race/Ethnicity

	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
TOTAL POPULATION							
White, Non-Hispanic	67.30	52.38	74.72	28.43	60.80	51.20	67.73
Black, Non-Hispanic	34.02	20.43	43.98	36.42	69.82	47.32	57.01
Hispanic	41.73	29.13	51.10	35.69	69.60	49.60	56.19
Asian, Pacific Islander	64.02	50.15	75.16	34.19	68.93	53.97	62.38
Native American	47.53	33.59	55.77	34.00	67.42	52.51	58.61
POPULATION BELOW FEDERAL POVERTY LINE							
White, Non-Hispanic	51.23	39.23	62.80	31.91	66.20	53.87	60.40
Black, Non-Hispanic	23.91	16.03	35.25	37.95	71.51	47.32	53.91
Hispanic	31.44	23.01	43.21	38.57	72.76	49.97	52.29
Asian, Pacific Islander	47.89	35.05	63.45	38.16	75.31	48.26	52.11
Native American	32.94	23.01	48.31	41.08	74.27	49.63	50.85

Source: HUD Table 12 Opportunity Indicators by race/ethnicity

OMAHA

Table V-44 Omaha Jurisdiction Opportunity Indicators by Race/Ethnicity

	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
TOTAL POPULATION							
White, Non-Hispanic	61.13	43.63	73.64	35.71	70.72	52.58	58.46
Black, Non-Hispanic	27.25	14.26	38.03	37.77	71.63	47.46	54.42
Hispanic	32.61	21.04	43.81	38.80	73.43	49.83	51.74
Asian, Pacific Islander	55.42	40.93	70.74	38.12	74.97	54.13	55.40
Native American	36.76	23.20	47.52	38.50	73.64	53.32	51.67
POPULATION BELOW FEDERAL POVERTY LINE							
White, Non-Hispanic	46.05	30.24	61.13	38.70	75.59	55.49	52.89
Black, Non-Hispanic	20.99	13.18	32.25	38.59	72.20	47.33	53.01
Hispanic	25.10	17.68	37.33	41.01	76.00	50.40	49.10
Asian, Pacific Islander	42.30	31.51	60.98	41.14	79.43	47.45	46.52
Native American	31.23	22.62	46.75	43.18	76.73	50.29	49.25

Source: HUD Table 12 Opportunity Indicators by race/ethnicity

According to HUD Table 12, in the Omaha jurisdiction, White, Non-Hispanic households have higher opportunity index scores in every category measured with the exception of transit index scores and low transportation cost index scores for the total population. Below the poverty line White households also have the highest scores with the exception of the same transit and transportation categories and the environmental health index scores. Conversely, Black, Non-Hispanic households have the lowest opportunity index scores above and below the poverty line with the exception of transit

index, low transportation cost index, and environmental health index. Overall, White and Asian or Pacific Islander households have higher index scores in the majority of categories. Black, Hispanic, and Native American households have lower scores above and below the poverty line in most access to opportunity categories with the exception those related to transportation and environmentally healthy neighborhoods.

As mentioned in the access to transportation section, the HUD data regarding transit index and transportation cost index was based on a very small percentage of the population in Omaha. In comparison to local data and community feedback, HUD data in these categories does not accurately reflect access to transportation in Omaha.

Similarly, as mentioned in the access to environmental healthy neighborhoods section, HUD's environmental health index was based solely on air quality index models. These models are based on estimates from local monitors and the self-reporting of local businesses. The data is recommended for use when assessing regions rather than on a neighborhood to neighborhood basis.

COUNCIL BLUFFS

Overall, the Opportunity Indicators are evenly dispersed by all race/ethnic groups with the exception of school proficiency. According to Table 12, Hispanic residents are slightly lower in opportunities than other races. Additionally, of those below the poverty line, Asian or Pacific Islander, Non-Hispanic and Native American, Non-Hispanic are disproportionately negatively impacted in the school proficiency area. This is debatable because the method of data collection by HUD skews the results for the Lewis Central Community School District.

BELLEVUE

Overall, the Opportunity Indicators Index values are evenly dispersed through the race and ethnicities in Bellevue. Multiple indices are inversely correlated with each other such as the Transit Trips index values being low while Low Transportation Cost index being high for Bellevue.

ii. Based on the opportunity indicators assessed above, identify areas that experience: (a) high access; and (b) low access across multiple indicators.

OMAHA

a. Areas to the west of 72nd Street in Omaha have the highest access to low poverty neighborhoods, jobs, and proficient schools. These neighborhoods also have the fewest number of housing problems. It is more difficult to find affordable housing west of 72nd and there is also less access to public transportation in the western portion of the city. The neighborhoods in Southwest Omaha tend to be the most homogenous neighborhoods in Omaha, with many Census tracts showing 90% or more households identifying as White, Non-Hispanic.

b. Areas of Omaha to the east of 72nd Street have a higher percentage of issues with housing problems, deteriorating housing stock, proximity to environmental issues, higher unemployment, higher rates of poverty, and less access to proficient schools. The same neighborhoods to the east of 72nd also have significantly higher populations of protected classes including minority households and residents with limited English proficiency. This area also has some of the most affordable housing based on the median income of the City. The majority of publicly supported housing is also concentrated to the east of 72nd Street.

COUNCIL BLUFFS

In Council Bluffs, residents in the east end have a higher access level than those in the west end, mid-city and Kaneshville-Tinley areas. This is particularly relevant in with access to low poverty neighborhoods.

BELLEVUE

Most neighborhoods are similar throughout Bellevue. The central and north central areas of Bellevue appear to be the most segregated for national origin while the southeastern, Olde Towne area has more poverty.

2. Additional Information

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

OMAHA

As mentioned in previous sections, a majority of the issues identified in HUD tables and maps under disparities in access to opportunities in Omaha included the impact of protected classes by race/ethnicity, national origin, limited English proficiency, and family size. Additional issues regarding access to opportunity for residents in protected classes mentioned throughout the community engagement process include access for aging residents, the disability community, and the LGBTQIA+ Community (Lesbian, Gay, Bisexual, Transgender, Queer, Intersex, and Asexual and plus indicating the inclusion of all other identities).

In both community meetings and through the Regional Fair Housing Survey, senior citizens expressed concerns with discrimination in employment opportunities, limited affordable housing for persons on fixed-incomes, and a need for more programs and services to help with affordable home repair and accessibility modifications. Similar concerns regarding lack of affordable housing and a need for accessibility modifications were expressed by the disability community. In addition the need for more transportation options and senior and accessible housing along transportation corridors was mentioned in multiple forms of community feedback. Residents representing the disability community also expressed the need for making certain sidewalks in the city are in good repair and allow for persons with mobility challenges to cross streets and access bus stops.

Attendees of the LGBTQIA+ focus group shared experiences of discrimination and fears of safety based on sexual orientation or gender identity regarding their employment, housing, and living situations. Attendees expressed the importance of the ordinance passed in 2012 to include the protection of the LGBTQIA+ community in Omaha's law prohibiting discrimination in employment, and the need for a similar policy that would provide protection against discrimination in housing. Additionally, survey respondents that identified as being part of the LGBTQIA+ community said that it was very important to feel welcome in their neighborhood. At least one respondent mentioned moving to a different location based on experiences of discrimination and concerns for safety.

COUNCIL BLUFFS

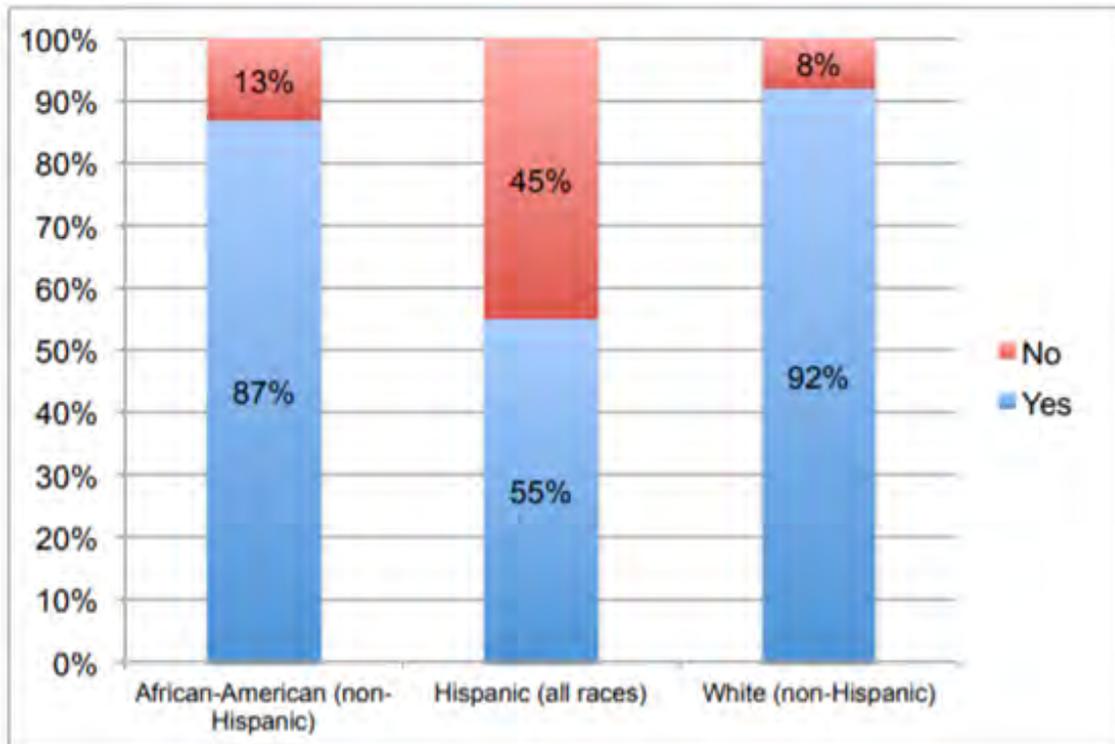
Major disparities in Council Bluffs relate to income and poverty levels.

The United Way ALICE (Asset Limited, Income Constrained, Employed) Report outlines the minimum cost option for each of the five basic household items needed to live and work in today's economy, which is called the "Household Survival Budget". The average annual Household Survival Budget for a four-person family living in Iowa is \$46,680, an increase of 17 percent from the start of the Great Recession in 2007, driven primarily by a 43 percent increase in the cost of healthcare and a 20 percent increase in the cost of food. The rate of inflation over the same period was 14 percent. This translates for a family of four to an hourly wage of \$23.34, 40 hours per week for 50 weeks per year for one parent (or \$11.67 per hour each if two parents work). Below is a chart that outlines monthly costs for the average Iowan in 2014 (Attachment L).

Additionally, according to the American Community Survey, 14.8% of Council Bluffs residents lived below the poverty line in the past 12 months. This is higher than both Bellevue (8.0%) and Omaha (11.9%).

In Pottawattamie County, 10,909 children are enrolled in HAWK-i children's health insurance program for uninsured children of working families. In a 2010 study completed by the University of Iowa, survey respondents reported that almost half of the parents of Hispanic/Latino children did not have health insurance.

Figure V-99 Parent's Health Insurance by Children's Race/Ethnicity Council Bluffs



Source: Health Insurance Coverage of Children in Iowa; An Overview of the 2010 Iowa Child and Family Household Health Survey

BELLEVUE

Bellevue's major employers positively impact many of the opportunity indicators. While the current employment market provides opportunities for different level positions, the City needs to continue efforts towards economic development. Local education institutions are partnering with employers and service providers to create job training programs to assist job seekers learn the skills for industries identified for development in Bellevue. Again, stakeholders identified the need for additional transportation opportunities into the Omaha metro area. As the Highway 34 corridor in southern Bellevue is developed, transportation, job training, and housing will be emphasized to encourage industrial jobs location to the area.

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

OMAHA

With over 1,000 non-profit organizations, many for profit, and government agencies, and Omaha's strong philanthropic community all working to increase quality of life for residents in the metropolitan areas, it would be impossible to provide an exhaustive list of the activities and groups addressing disparities in access to opportunity within this assessment.

Some the organizations who provided data and are working towards common goals in areas regarding access to proficient schools, employment, and transportation include:

Education

- Buffett Early Child Institute
- Early Childhood Services
- Educare Omaha
- College Possible Omaha
- Avenue Scholars
- Learning Communities of Douglas and Sarpy County

Employment

- Greater Omaha Chamber
- Heartland Workforce Solutions
- Empowerment Network/Step-Up Omaha
- Urban League of Nebraska
- Heartland Workers Center
- Vocational Development Center

Transportation

- Mode Shift Omaha
- Metro Area Planning Agency (MAPA)
- Metro Omaha/MOBY by Metro
- Ways to Work
- Heartland BCycle

COUNCIL BLUFFS

Council Bluffs continues to work to remove barriers that may exist for access in opportunities. For transportation, routes were updated in 2016 to reflect areas most frequently traveled and paratransit service was expanded with the assistance of SWITA.

For employment, Advance Southwest Iowa, the Council Bluffs Chamber of Commerce and the City work together to provide incentive packages for existing and prospective businesses. The City utilizes the following forms of incentives to attract development:

- Workforce Housing Tax Credit Program (WHTC)
- Targeted Jobs Withholding Tax Credit Pilot Program
- High Quality Jobs Program
- Iowa Industrial New Jobs Job Training Program (260E)
- Urban Renewal – Tax Increment Financing
- Urban Revitalization
- Capital Improvement Funds
- Community Development Block Grant Program Funds
- Home Investment Partnership Program Funds
- Redevelopment Tax Credits Program for Brownfield and Grayfield Sites
- Historic Preservation Tax Credit Program

BELLEVUE

In 2015, the bus route was changed due to lack of ridership. The Bellevue City Council approved changes to the bus route and the required funding levels to support the route. The City of Bellevue also offers a Specialized Transportation Program that provides transportation to qualified elderly and disabled residents. The cost is \$2.00 per trip each way for in town trips and \$4.00 for out of Bellevue trips. This service is operated between 8:00 am and 3:00 pm Monday through Friday.

The City of Bellevue is expected to share cost for both services which does affect the service provided. While the overall cost is a factor, the ridership must support the continued delivery of the service. With lower ridership numbers and limited public service dollars available, the transportation services will be scrutinized for benefit provided. Since the service is only provided twice a day five days a week, the households that need the service may not be reached and therefore not truly reflecting the need in the community.

3. Contributing Factors of Disparities in Access to Opportunity

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

OMAHA

Factors included in previous sections under disparities in access to opportunity:

- Location of employers
- Lack of public and private investment in specific neighborhoods
- Segregation
- Availability, type, frequency, and reliability of public transportation
- Location of proficient schools and school assignment policies
- Location of affordable housing
- Access to financial services
- Private discrimination
- Lack of resources for fair housing agencies and organizations
- Impediments to mobility
- Lack of access to opportunity due to high housing costs
- Lending discrimination
- Private discrimination
- Availability of affordable units in a range of sizes
- Deteriorated and abandoned properties
- Source of income discrimination
- Occupancy codes and restrictions
- Displacement of residents due to economic pressures

COUNCIL BLUFFS

Disparities in Access to Opportunity: Access to Low Poverty Neighborhoods

1. Location and type of affordable housing
2. Lack of access to opportunity due to high housing costs
3. Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
4. Lack of resources for fair housing agencies and organizations

Disparities in Access to Opportunity: Access to Environmentally Healthy Neighborhoods

1. Location of employers
2. The availability, type, frequency and reliability of public transportation

Disparities in Access to Opportunity: Access to Employment

1. Location of employers
2. The availability, type, frequency and reliability of public transportation
3. Inaccessible buildings, sidewalks, pedestrian crossings or other infrastructure

BELLEVUE

Availability, type, frequency and reliability of public transportation:

Bellevue currently is limited on public transportation opportunities. This is shown in the low scores on the HUD Transportation Index (HUD Table 12). With Bellevue having substantially more housing development and job centers located in Douglas County and western Sarpy County, most households must rely on their personal car for transportation to employment. Residents also stated that the frequency of the provided bus route and limited coverage does not provide a viable option for transportation.

Households who depend on public transportation are presented barriers to employment opportunities and services. Those who most often depend on public transportation are households living in poverty, individuals with a disability, and elderly.

With the bus route focused east of Highway 75, the remaining western portion of Bellevue has no bus routes into Omaha. This service is limited by the times the services are provided and does not have weekend transportation.

During the community input sessions, Bellevue received input from residents and economic development entities that public transportation is a high need and should be a high priority. While services are being provided, the true need may not be reflected in the ridership and anticipated needs will need to be evaluated to determine effectiveness in addressing need.

Lack of private investments in specific neighborhoods:

Economic development is always a high priority for communities to ensure continued future growth. Developed areas of the city need additional focus to bring private investment such as services and job opportunities to areas that have become stagnant.

With focus on the future growth of the Highway 34 corridor in southern Bellevue, the City will have to look at additional housing, job trainings, and transportation options to encourage development and employment opportunities.

The majority of the established areas, specifically north of Olde Towne Bellevue and east of Fort Crook Road, are residential zoned and have limited commercial and retail space. Development in the older eastern areas of Bellevue are limited by lot availability and have limited commercial zoning available.

The lack of private investments affect those that live in this area of the community including all races, but does not affect any one class specifically. Accessibility to employment would be more affected by those who are limited to this area based on public transportation needs. The issue has not changed in recent years and change is not anticipated with continued new development moving west and southwest.

With future economic development anticipated specifically along the Highway 34 Development and housing development to continue in the west and southwest portions of Bellevue, the discussion needs to begin regarding housing needs, transportation between housing and employment centers with identification of possible incentives to encourage needed development.

Location and type of affordable housing:

Black households living below the poverty level are more likely to be living in a high poverty neighborhood. By addressing the contributing factors listed above and providing affordable housing options throughout the city, opportunities for access could be increased.

Location of employers:

This contributing factor is related to others concerning public transportation. Bellevue is limited on employment centers with most households commuting with a mean travel time of 20 minutes (2011-2015 ACS). Most of the major employers in the region are located outside of the city limits. Access to employment centers would assist with creating increased opportunities for low-income households.

The limited access to transportation denies access to employment opportunities for those who cannot not access public transportation. Specifically those who depend on public transportation, such as low-income households, elderly and those with a disability.

Most major employers and employment centers are located outside city limits in west Sarpy County and north in Douglas County. There have not been any major permanent employment increases in Bellevue in previous years. The Highway 34 corridor is the only substantial economic development opportunity on the horizon, but there has not been a commitment from any major industry to begin construction in the area. Economic development and job centers will continue in western Sarpy County which has open land ready for development and is closer to transportation corridor of Interstate 80.

The City of Bellevue does have influence on the development within city limits and the extra territorial jurisdiction. The City does have tools provided by the Legislative Bill 840, Local Option Municipal Economic Development Act, which provides power to use local sources of revenue for economic or industrial projects and programs. This program is being used to promote new development in the Highway 34 Corridor by providing assistance for eligible economic activities such as land purchase, execute options, construction, and loan funding.

Lack of public investments in specific neighborhoods:

The City of Bellevue is continually working to address public infrastructure needs. With limited resources available, many projects and needs are not met timely.

iv. Disproportionate Housing Needs

1. Analysis

a. Which protected class groups (by race/ethnicity and familial status) experience higher rates of housing problems (cost burden, overcrowding, or substandard housing) when compared to other groups for the jurisdiction and region? Which groups also experience higher rates of severe housing cost burdens when compared to other groups?

Table V-44 Housing Characteristics for Region by County

Subject	Regional Housing Characteristics by County 2012-2016							
	Harrison	Mills	Pottawattamie	Douglas	Sarpy	Cass	Saunders	Washington
Total Housing Units	6,731	6,087	39,537	227,013	60,991	11,272	9,380	8,419
Occupied Units	89.8%	89.4%	92.8%	92.9	94.7%	86.1%	85.2%	95.3%
Owner Occupied Avg Household Size	2.39	2.64	2.55	2.69	2.89	2.65	2.6	2.61
Renter Occupied Avg Household Size	2.10	2.51	2.31	2.25	2.34	2.36	2.52	2.07
Single Family Detached	85.4%	82.3%	75.8%	67.1%	73.7%	87.4%	86.5%	83.4%
10-19 Units	.7%	2.3%	3.4%	7.2%	7.4%	1.0%	.2%	1.4%
20 or More Units	2.2%	.5%	6.3%	10.4%	6.5%	1.7%	2.5%	4.0%
Built 1939 or earlier	43.2%	28.6%	27.8%	18.6%	3.3%	26.2%	33.5%	21.2%
No Bedroom	.6%	.9	1.7%	2.2%	1.1%	2.1%	1.2%	1.2%
1 Bedroom	7.7%	8.5%	10.7%	14.9%	8.7%	6.2%	5.9%	6.3%
2 Bedroom	30.4%	21.8%	29.8%	23.4%	18.8%	26.5%	26.3%	21.7%
3 Bedroom	38.3%	43.9%	39.4%	36.9%	42.7%	38.3%	39.1%	40.0%
4 Bedroom	16.9%	19.2%	14.5%	17.7%	23.4%	20.1%	20.4%	24.3%
5 or More Bedroom	6.2%	5.7%	3.9%	4.9%	5.2%	6.9%	7.1%	6.5%

Source: US Census Bureau Comparative Housing Characteristics 2012-2016 ACS (5yr)

Table V-45 Regional Disproportionate Housing Needs

Disproportionate Housing Needs	(Omaha-Council Bluffs, NE-IA) Region		
Households experiencing any of 4 housing problems	# with problems	# households	% with problems
Race/Ethnicity			
White, Non-Hispanic	73,076	280,218	26.08%
Black, Non-Hispanic	12,097	25,625	47.21%
Hispanic	9,530	19,697	48.38%
Asian or Pacific Islander, Non-Hispanic	1,942	5,864	33.12%
Native American, Non-Hispanic	543	1,102	49.27%
Other, Non-Hispanic	1,986	4,669	42.54%
Total	99,150	337,160	29.41%
Household Type and Size			
Family households, <5 people	41,380	187,371	22.08%
Family households, 5+ people	11,952	34,078	35.07%
Non-family households	45,830	115,732	39.60%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems
Race/Ethnicity			
White, Non-Hispanic	32,668	280,218	11.66%
Black, Non-Hispanic	6,817	25,625	26.60%
Hispanic	5,726	19,697	29.07%
Asian or Pacific Islander, Non-Hispanic	1,128	5,864	19.24%
Native American, Non-Hispanic	428	1,102	38.84%
Other, Non-Hispanic	1,104	4,669	23.65%
Total	47,840	337,160	14.19%

Source: HUD Table 9 Disproportionate Housing Needs, CHAS

HUD table 9 is based on Comprehensive Housing Affordability Strategy (CHAS) data. HUD’s definition of “housing problems” includes: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30% of household income. Housing problems defined as “severe” include the same issues of incomplete facilities and overcrowding, but include cost burden greater than 50% of the household income.

Across the region Native American households have the highest percentage of households experiencing problems and the highest percentage of severe housing problems. Hispanic and black households also have higher percentages of problems

and severe housing problems. Non-family households experience the highest amount of household problems followed by households with five or more people.

OMAHA

Table V-46 Demographics of Disproportionate Housing Needs Omaha

Table 9 - Demographics of Households with Disproportionate Housing Needs			
Disproportionate Housing Needs		(Omaha, NE CDBG, ESG) Jurisdiction	
Households experiencing any of 4 housing problems	# with problems	# households	% with problems
Race/Ethnicity			
White, Non-Hispanic	36,035	125,140	28.80%
Black, Non-Hispanic	10,705	21,485	49.83%
Hispanic	6,885	13,345	51.59%
Asian or Pacific Islander, Non-Hispanic	1,300	3,644	35.68%
Native American, Non-Hispanic	369	733	50.34%
Other, Non-Hispanic	1,380	2,820	48.94%
Total	56,640	167,120	33.89%
Household Type and Size			
Family households, <5 people	21,225	82,724	25.66%
Family households, 5+ people	7,285	16,600	43.89%
Non-family households	28,130	67,800	41.49%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems
Race/Ethnicity			
White, Non-Hispanic	16,905	125,140	13.51%
Black, Non-Hispanic	6,120	21,485	28.48%
Hispanic	4,355	13,345	32.63%
Asian or Pacific Islander, Non-Hispanic	830	3,644	22.78%
Native American, Non-Hispanic	290	733	39.56%
Other, Non-Hispanic	694	2,820	24.61%
Total	29,185	167,120	17.46%

Source: HUD Table 9, CHAS

In Omaha, Hispanic households have the highest percentage of households with problems at 51.59%. About 50% of Native American and Black households have housing problems. Native Americans have the highest percentage of severe housing

problems, followed by Hispanic and Black households. Households with five or more people have the highest percentage of household problems in Omaha at 43.89%.

Discussions with organizations who serve the Native American tribes who are living in Omaha have expressed a concern with housing security. The displacement of local tribal members based on rising housing costs and over the several decades has created a trend of Native American Households returning to reservations to find housing and other resources. As mentioned in previous sections, Native Americans also experience the highest amount of housing problems across the region and in the Omaha jurisdiction.

Activities included in the community engagement process, asked residents in Omaha to select the most needed types of housing in order to gain feedback on housing need. The top three most commonly requested housing types across all events were single family affordable, elderly affordable, and multifamily affordable.

COUNCIL BLUFFS

Table V-47 Disproportionate Housing Needs Council Bluffs

Disproportionate Housing Needs		(Council Bluffs, IA CDBG) Jurisdiction		
Households experiencing any of 4 housing problems	# with problems	# households	% with problems	
Race/Ethnicity				
White, Non-Hispanic	6,729	22,328	30.14%	
Black, Non-Hispanic	124	274	45.26%	
Hispanic	679	1,428	47.55%	
Asian or Pacific Islander, Non-Hispanic	58	118	49.15%	
Native American, Non-Hispanic	20	44	45.45%	
Other, Non-Hispanic	193	335	57.61%	
Total	7,800	24,520	31.81%	
Household Type and Size				
Family households, <5 people	3,285	13,584	24.18%	
Family households, 5+ people	914	2,009	45.50%	
Non-family households	3,610	8,929	40.43%	
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	
Race/Ethnicity				
White, Non-Hispanic	3,163	22,328	14.17%	
Black, Non-Hispanic	99	274	36.13%	
Hispanic	449	1,428	31.44%	
Asian or Pacific Islander, Non-Hispanic	39	118	33.05%	
Native American, Non-Hispanic	20	44	45.45%	
Other, Non-Hispanic	169	335	50.45%	
Total	3,940	24,520	16.07%	

Source: HUD Table 9, CHAS

According to Table 9, Other, Non-Hispanics experience more household problems than any other race/ethnicity with 57.61%. Asian or Pacific Islander, Non-Hispanics also have a higher percentage of household problems with 49.15%. These two groups also have a higher percent with severe cost burden with 50.75% and 45.45% respectively. For severe housing problems, White, Non-Hispanic experiences significantly less problems than all other races. Asian-Pacific Islander, Non-Hispanic and Native American, Non-Hispanic make up a total of 1.13% (704 people) of the city's population but nearly half of both populations experience housing problems with Native-Americans experiencing four severe housing problems.

BELLEVUE

HUD defines housing issues as one or more of the following: incomplete kitchen facilities, incomplete plumbing facilities, more than one person per room, and cost burden greater than 30 percent. According to HUD AFFH Table 9 in the City of Bellevue, 27 percent or 5,215 of the 19,645 households experience housing problems and 13 percent or 2,635 households experience severe housing problems. These numbers are slightly less than the Omaha-Council Bluffs metro area.

Table V-48 Demographics of Households with Disproportionate Housing Needs

Disproportionate Housing Needs	Bellevue Jurisdiction			Omaha-Council Bluffs Region		
	# with problems	# households	% with problems	# with problems	# households	% with problems
Households experiencing any of 4 housing problems						
Race/Ethnicity						
White, Non-Hispanic	3,740	15,780	23.70%	73,076	280,218	26.08%
Black, Non-Hispanic	435	1,299	33.49%	12,097	25,625	47.21%
Hispanic	814	1,833	44.41%	9,530	19,697	48.38%
Asian or Pacific Islander, Non-Hispanic	85	304	27.96%	1,942	5,864	33.12%
Native American, Non-Hispanic	54	79	68.35%	543	1,102	49.27%
Other, Non-Hispanic	83	343	24.20%	1,986	4,669	42.54%
Total	5,215	19,645	26.55%	99,150	337,160	29.41%
Household Type and Size						
Family households, <5 people	2,425	11,715	20.70%	41,380	187,371	22.08%

Family households, 5+ people	770	2,249	34.24%	11,952	34,078	35.07%
Non-family households	2,025	5,685	35.62%	45,830	115,732	39.60%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	1,795	15,780	11.38%	32,668	280,218	11.66%
Black, Non-Hispanic	215	1,299	16.55%	6,817	25,625	26.60%
Hispanic	453	1,833	24.71%	5,726	19,697	29.07%
Asian or Pacific Islander, Non-Hispanic	75	304	24.67%	1,128	5,864	19.24%
Native American, Non-Hispanic	50	79	63.29%	428	1,102	38.84%
Other, Non-Hispanic	60	343	17.49%	1,104	4,669	23.65%
Total	2,635	19,645	13.41%	47,840	337,160	14.19%
<p>Data Sources: CHAS</p> <p>Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.</p>						

Although Native American households make up the smallest percentage of Bellevue households, they experience significantly higher rates of housing problems compare to other race and ethnicities. Sixty-eight (68) percent of Native American households and 44 percent of Hispanic households face housing problems while only 23 percent of

White households have housing problems.

The majority of households in Bellevue have less than five people and face the least housing problems as shown in HUD AFFH Table 10. Non-family households have the most housing problems at 35 percent followed closely by family households with more than five people with 34 percent.

Native American households also face the highest percentage of severe housing problems. Severe housing problems are the same as the housing problems, but with cost burden greater than 50%.

Table V-49 Demographics of households with Severe Housing Cost Burden

Households with Severe Housing Cost Burden	Bellevue Jurisdiction			Omaha-Council Bluffs Region		
	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
Race/Ethnicity						
White, Non-Hispanic	1,540	15,780	9.76%	28,670	280,218	10.23%
Black, Non-Hispanic	205	1,299	15.78%	6,203	25,625	24.21%
Hispanic	295	1,833	16.09%	3,444	19,697	17.48%
Asian or Pacific Islander, Non-Hispanic	35	304	11.51%	635	5,864	10.83%
Native American, Non-Hispanic	50	79	63.29%	393	1,102	35.66%
Other, Non-Hispanic	45	343	13.12%	920	4,669	19.70%
Total	2,170	19,645	11.05%	40,265	337,160	11.94%
Household Type and Size						

Family households, <5 people	1,009	11,715	8.61%	15,899	187,371	8.49%
Family households, 5+ people	209	2,249	9.29%	3,340	34,078	9.80%
Non-family households	929	5,685	16.34%	21,013	115,732	18.16%

Data Sources: CHAS

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

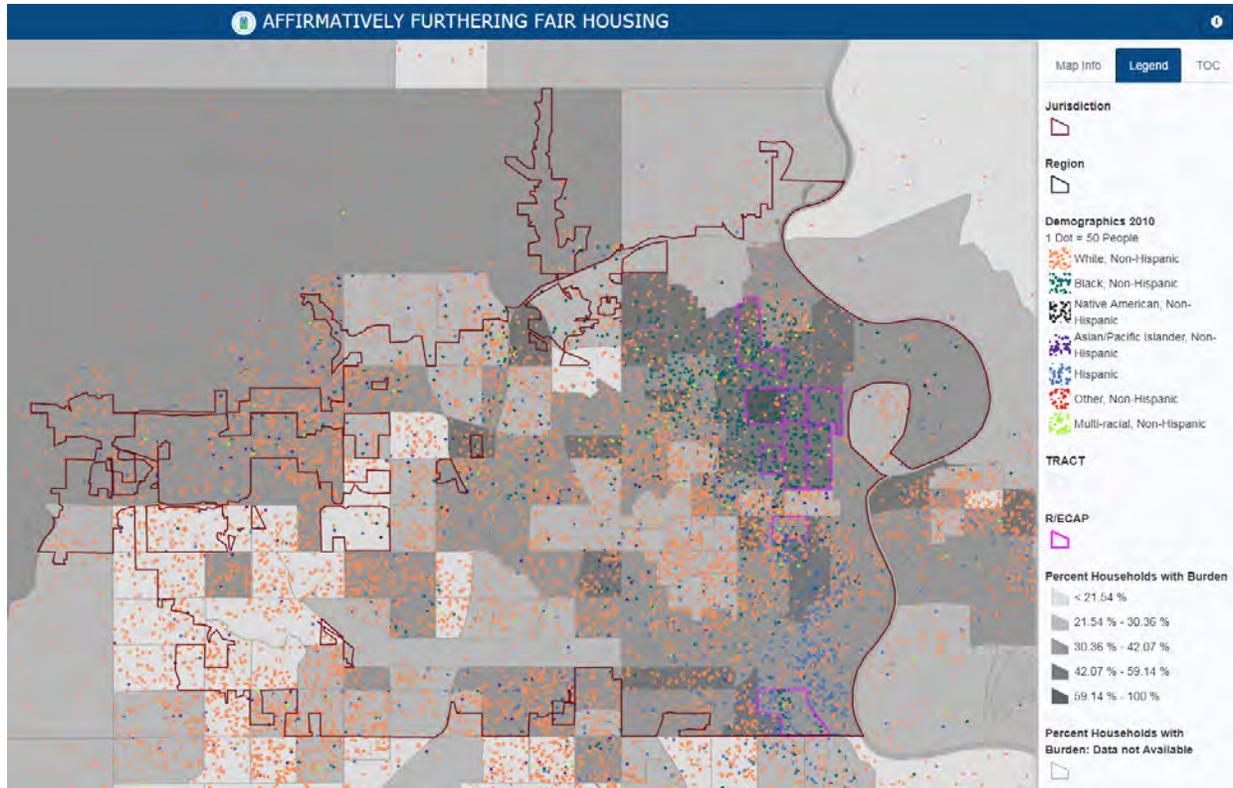
As with housing problems, Native American Households face far more severe housing cost burden in Bellevue. Of the 79 Native American households in Bellevue, 50 are faced with severe cost burden, which is paying more than 50 percent of household income on housing cost. This is significantly higher percentage than the metro area as a whole.

Again, non-family households are more severely cost burdened than family households, but percentages are closer, only a difference of 8 percent.

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

OMAHA

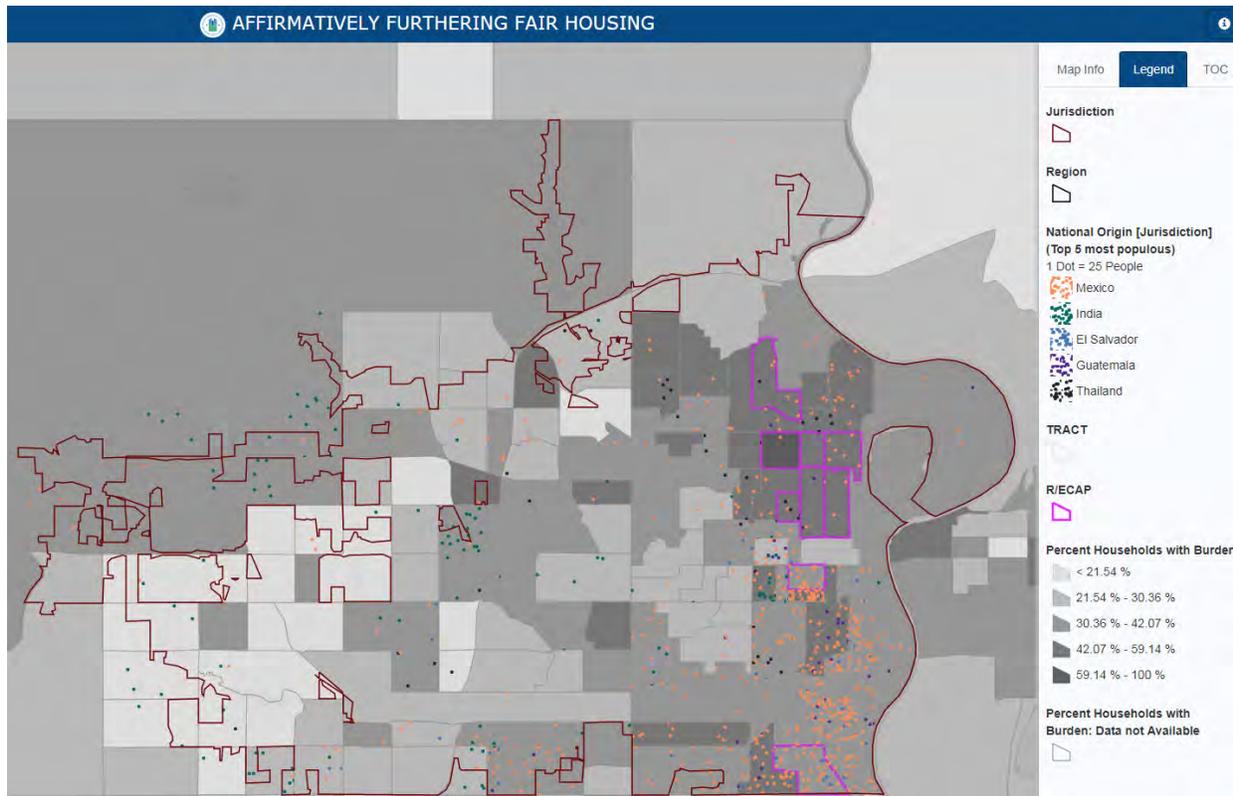
Figure V -100 Omaha Percentage of Housing Problems and Race/Ethnicity



Source: HUD Map 6 Housing Problems, Dot Density 1:50

The majority of census tracts with 40% or more of households with housing problems are east of 72nd street. Northeast Omaha has the highest percentage of households with housing problems. Areas with highest concentrations of minority households, including R/ECAP tracts also have the highest percentage of housing problems. For example, 63.58% of households or 480 units in R/ECAP census tract 59.02 have housing problems. Similarly, census tracts in Northeast and Southeast Omaha with highest percentage of housing problems also have the highest populations of persons born outside of the US.

Figure V -101 Omaha Percentage of Housing Problems and National Origin



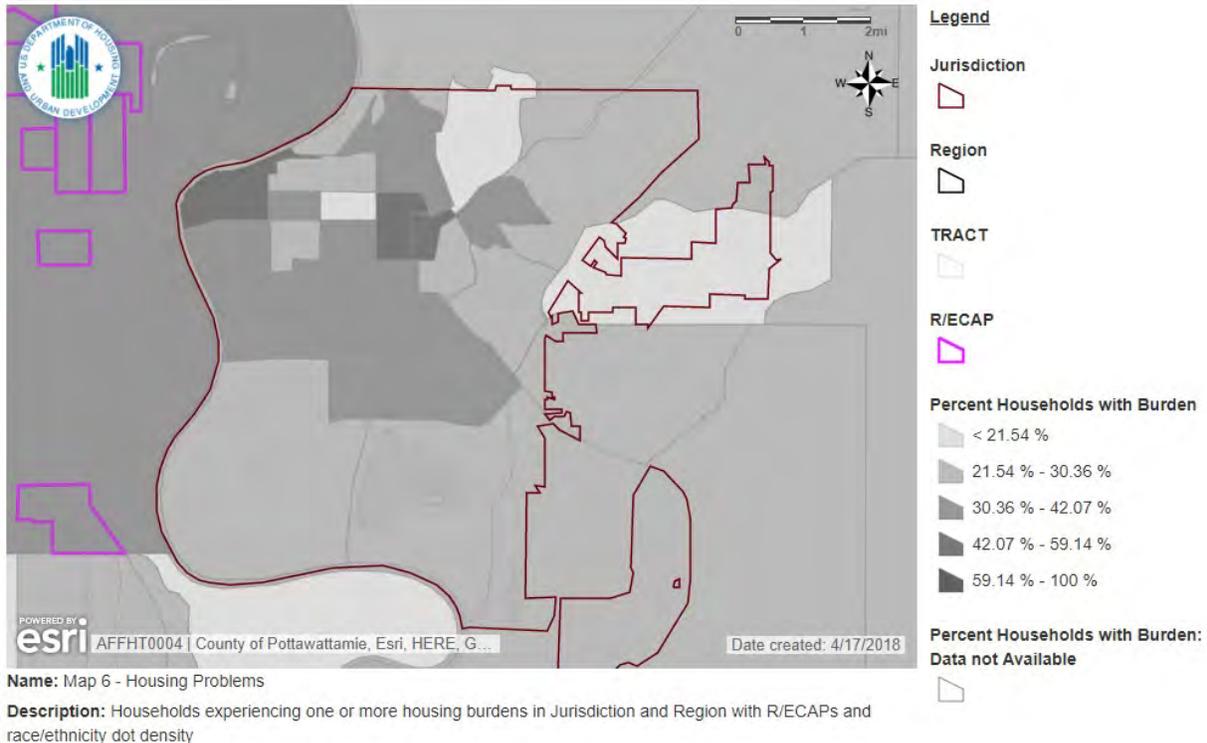
Source: HUD Map 6 Housing Problems, Dot Density 1:25

COUNCIL BLUFFS

Based on Map 6, areas with the highest housing burdens are US Census Tracts 304.01, 307, and 309. As stated previously, these census tracts also include the highest poverty neighborhoods, higher levels of racial/ethnic concentration, and the highest environmental health concerns. Additionally, Census Tract 307 shows a higher concentration of individuals with a national origin of Mexico than other tracts.

These areas show a percentage of households with any four housing problems greater than 46.11%. Housing problems is defined by HUD includes housing cost burden, severe housing cost burden, substandard housing conditions, and overcrowding.

Figure V -102 Housing Burdens by Census Tract Council Bluffs



Source: HUD Map 6 Housing Problems

BELLEVUE

AFFH Map 9 show residential living patterns for persons by race/ethnicity and national origin overlaid on shading indicating the percentage of households experiencing one or more housing problems.

The areas on the map indicating higher percentages of housing problems are Offutt Air Force Base and privatized military housing. None of the identified national origins are living in areas with housing problems of 35 percent and higher. The indication of housing burden above 46 percent could be due to the inclusion of enlisted dormitories as the majority of the housing in this area which are occupied by single airmen.

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

OMAHA

Table V-50 Publicly Supported Housing by Program Category

Omaha Jurisdiction								
	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	1,464	54.73%	372	13.91%	811	30.32%	986	36.86%
Project-Based Section 8	601	62.73%	237	24.74%	115	12.00%	271	28.29%
Other Multi-family	186	67.15%	8	2.89%	0	0.00%	NA	NA
HCV Program	1,266	26.60%	1,471	30.90%	1,910	40.13%	2,642	55.50%

Source: HUD Table 11, APSH

According to HUD table 11, children reside in 36.86% of households within Public Housing, 28.29% of Project-Based Section 8, and 55.50% of households accessing the Housing Choice Voucher (HCV) program. Although many households with a need for publicly supported housing have children, the largest percentages of Public Housing, Project-Based Section 8 housing, and other multi-family housing units are 0-1 bedrooms.

COUNCIL BLUFFS

In Council Bluffs, 184 households with children are in project-based Section 8 housing and 225 are in homes with housing choice vouchers (HCV) for a total of 439 households with children in publicly supported housing. Table 9 outlines that 45.50% of families with

households of five or more have household problems. This is a significantly higher proportion of households compared to families of less than five (24.18%) or non-family households (40.43%).

The city’s publicly supported housing does not house families that have more than two occupants. There are other subsidized housing units within the City of Council Bluffs that house more than two occupants. The majority of families reside in the west end of Council Bluffs. The City of Council Bluffs does not have a lack of stock in housing that is suitable for families, except there is a lack of housing suitable for large families. There have been families who have received a Housing Choice Voucher from the Municipal Housing Agency of Council Bluffs, and are unable to find housing that is large enough and is affordable.

Table V-51 Public Housing Types by Program Category: Units by Number of Bedrooms and Number of Children

Council Bluffs								
Housing Type	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
	#	%	#	%	#	%	#	%
Public Housing	288	100.00%	0	0.00%	0	0.00%	N/a	N/a
Project-Based Section 8	217	47.48%	134	29.32%	81	17.72%	184	40.26%
Other Multifamily	44	97.78%	0	0.00%	0	0.00%	N/a	N/a
HCV Program	148	24.46%	237	39.17%	195	32.23%	255	42.15%

Note 1: Data Sources: APSH

BELLEVUE

Table V-52 below shows publicly supported housing by program category with units by number of bedrooms and number of children.

Table V-52

Bellevue, NE								
Housing Type	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
	#	%	#	%	#	%	#	%
Public Housing	0	0.00%	19	42.22%	23	51.11%	35	77.78%
Project-Based Section 8	179	58.69%	54	17.70%	70	22.95%	109	35.74%
Other Multifamily	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
HCV Program	36	26.28%	36	26.28%	50	36.50%	63	45.99%
Source HUD Table 11 Note 1: Data Sources: APSH (A Picture of Subsidized Households)								

Households with children make up over 75 percent of households in public housing. There are 35 households are in public housing; only 42 units are available. Almost half of the HCV program participants are households with children. For Project-Based Section 8 Housing, 35 percent of units are occupied by households with children while 40 percent of the housing units have 2 bedrooms or more. This illustrates the need for affordable housing for households with children.

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

Figure V -53 Regional and Jurisdictional Homeownership and Rental Rates by Race/Ethnicity

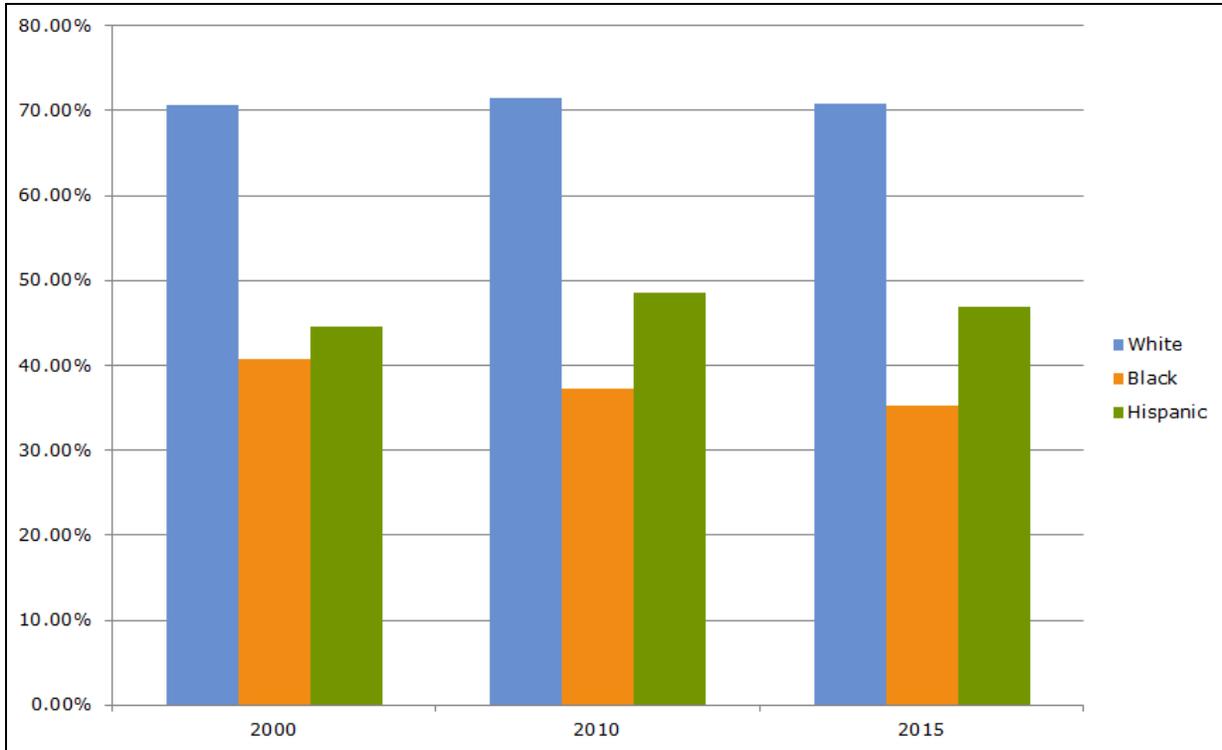
Race/Ethnicity	Percentage of households Region		Percentage of households Omaha		Percentage of households Council Bluffs		Percentage of households Bellevue	
	Own	Rent	Own	Rent	Own	Rent	Own	Rent
White, Non-Hispanic	89.13%	71.05%	83.99%	62.02%	93.59%	86.8%	83.64%	73.54%
Black, Non-Hispanic	4.14%	14.54%	7.27%	20.71%	0.51%	2.26%	5.04%	10.00%
Hispanic	4.26%	9.00%	6.19%	10.51%	4.59%	8.08%	8.39%	11.34%
Asian or Pacific Islander	1.25%	2.71%	1.18%	3.60%	0.34%	0.73%	1.09%	2.44%
Native American	0.21%	0.54%	0.27%	0.66%	0.13%	0.23%	0.08%	1.10%
Other, Non-Hispanic	0.99%	2.17%	1.11%	2.49%	0.83%	2.37%	1.81%	1.57%
Total % Household Units	73%	27%	59%	41%	64%	36%	68%	32%
Total # Household Units	224,970	112,190	97,745	67,375	15,675	8,845	13,295	6,350

Source: HUD Table 16 Homeownership and Rental Rates by Race/Ethnicity

Across the region and in each jurisdiction, White households are the only demographic with a higher percentages of homeowners than renters. For every other race and/or ethnicity, there are on average at least twice as many households renting rather than owning their home.

The table below provides information on the eight county Metropolitan Statistical Area (MSA) between 2010 and 2015 for White, Black, and Hispanic households.

Figure V -103 Regional Homeownership Rates by Race/Ethnicity



Source: HUD Data, Earl Redrick

The percentage of White households owning homes is nearly double the percentage of homeowners in Black and Hispanic households. Between 2000 and 2015 there is decline in ownership among Black households.

T

Table V-54 2015 Regional MSA Demographics and Home Mortgage Loan Origination Data

Demographic Race/Ethnicity	NE/IA MSA Population	% of Total MSA Population	# of Loan Originations by Race/Ethnicity	% of Total Loan Originations by Race/Ethnicity
White	756,180	81.03	13,111	90.55
Black	69,641	7.46	340	2.35
Hispanic	86,076	9.22	634	4.38
Asian/PI	21,374	2.29	394	2.72
Total	933,271	100	14,479	100

Source: Home Mortgage Disclosure Act, Credit Earl Redrick

There are also differences in the number of home mortgages based on race and/or ethnicity across the eight county Metropolitan Statistical Area (MSA). The table above provides a comparison of the percentage of the total population of the MSA and the percentage of households who originated home mortgage loans. According to 2015 data, White residents account for 81.03% of the MSA population but originated over 90% of loans for homes in the area. 7.46% of the population identifies as Black, but black households only made up 2.35% of home mortgage loans. Over 9% of the MSA population is Hispanic, but only 4.38% of home mortgage loans originated were Hispanic households. Asian and/or Pacific Islander families had the most accurate representation based on, accounting for 2.29% of the MSA population and 2.72% of the home mortgage loans.

OMAHA

Table V-55 Omaha Comparison of Homeowners and Renters by Race/Ethnicity

Percentage of Households by Race/Ethnicity		
Race/Ethnicity	Own	Rent
White, Non-Hispanic	83.99%	62.02%
Black, Non-Hispanic	7.27%	20.71%
Hispanic	6.19%	10.51%
Asian or Pacific Islander	1.18%	3.60%
Native American	0.27%	0.66%
Other, Non-Hispanic	1.11%	2.49%
Total % Household Units	59%	41%
Total # Household Units	97,745	67,375

Source: HUD Table 16 Homeownership by Race/Ethnicity

Similar to the NE-IA Region, minority households in Omaha are at least twice as likely to rent rather than own their home. According to the most recent US Census Bureau Comparative Housing Characteristics data (2012-2016 ACS 5yr), 75% of homeowners with a mortgage in Douglas County pay less than 30% of their monthly household income on mortgages, real estate taxes, various insurances and fees. Across the County, 47.8% of those same homeowners list these ownership costs as less than 20% of their household income. Measuring the same costs, 86% percent of homeowners without a mortgage pay less than 30% of their household income on owner costs, and 74% of those same homeowners are paying 20% or less of their household income on owner-related costs. According to the same data source, only 51% of renters in Douglas County are paying less than 30% of their household income on rent. Only 27% of those households are paying a monthly rent that makes up less than 20% of their household income.

According to HUD data, minority households are twice as likely to rent than own, and according to Census Bureau data the percentage of renters who are paying less than 30% of their household income on housing is much lower than for those who own their home. It is likely based on this information that minority households who are renting

their homes have greater difficulty attaining housing that is considered “affordable” or at a cost less than 30% of their average monthly household income.

COUNCIL BLUFFS

The housing stock in Council Bluffs varies in construction from the late 1800s to the present. With approximately 27,000 housing units, the City has an estimated 19,000 single-family units and 8,000 two-family and multi-family units. Of the 27,000 units, approximately 24,750 (37.1%) are owner-occupied, 15,500 are rental (11.2%) and the remaining are vacant (2.4%).

The median mortgage for Council Bluffs is \$1,140 per month with 21.5% of households spending 35.0% or more of the household income on a mortgage payment. This is slightly higher than the Omaha-Council Bluffs Metropolitan area, which averages \$1,013 per month. The median rent per month for the City is \$694 with 38.8% of households spending 35.0% or more of the household income on rent. In the Omaha-Council Bluffs Metropolitan area, the average rent for a one bedroom in the city center is \$905.25 per month in the city center or \$683.93 per month outside the center. This aligns with the rents for Council Bluffs.

Table V-56 Homeownership and Rental Rates by Race/Ethnicity

Race/Ethnicity	Council Bluff Jurisdiction				Omaha-Council Bluffs Region			
	Homeowners		Renters		Homeowners		Renters	
	#	%	#	%	#	%	#	%
White, Non-Hispanic	14,670	93.59%	7,640	86.38%	200,520	89.13%	79,715	71.05%
Black, Non-Hispanic	80	0.51%	200	2.26%	9,325	4.14%	16,308	14.54%
Hispanic	720	4.59%	715	8.08%	9,594	4.26%	10,095	9.00%
Asian or Pacific Islander, Non-Hispanic	54	0.34%	65	0.73%	2,822	1.25%	3,038	2.71%
Native American, Non-Hispanic	20	0.13%	20	0.23%	478	0.21%	607	0.54%
Other, Non-Hispanic	130	0.83%	210	2.37%	2,220	0.99%	2,435	2.17%
Total Household Units	15,675	-	8,845	-	224,970	-	112,190	-
Note 1: Data presented are numbers of households, not individuals.								
Note 2: Data Sources: CHAS								

According to American FactFinder 2010 Census data, White/Non-Hispanic families live in 58.5% of the owner-occupied houses. Hispanics live in 2.7% of owner-occupied

units. Other Races include Black/Non-Hispanic (0.3%), American Indian/Non-Hispanic (0.1%), Asian/Non-Hispanic (0.3%), and two or more races (0.4%).

For renter-occupied units, 36.4% are Non-Hispanic and 2.4% are Hispanic.

White/Non-Hispanic households make up 34.5% of total renter-occupied units and additional units are occupied by Black/Non-Hispanic (0.9%), American Indian/Non-Hispanic (0.2%), Asian/Non-Hispanic (0.2%), and two or more races (0.6%).

BELLEVUE

Table V-57 below has data regarding homeownership and rental rates by race and ethnicity.

Table V-57 Bellevue Homeownership and Rental Rates

Race/Ethnicity	Bellevue Jurisdiction				Omaha-Council Bluffs Region			
	Homeowners		Renters		Homeowners		Renters	
	#	%	#	%	#	%	#	%
White, Non-Hispanic	11,120	83.64%	4,670	73.54%	200,520	89.13%	79,715	71.05%
Black, Non-Hispanic	670	5.04%	635	10.00%	9,325	4.14%	16,308	14.54%
Hispanic	1,115	8.39%	720	11.34%	9,594	4.26%	10,095	9.00%
Asian or Pacific Islander, Non-Hispanic	145	1.09%	155	2.44%	2,822	1.25%	3,038	2.71%
Native American, Non-Hispanic	10	0.08%	70	1.10%	478	0.21%	607	0.54%
Other, Non-Hispanic	240	1.81%	100	1.57%	2,220	0.99%	2,435	2.17%
Total Household Units	13,295	-	6,350	-	224,970	-	112,190	-

Source: HUD Table 12 , Data Source CHAS

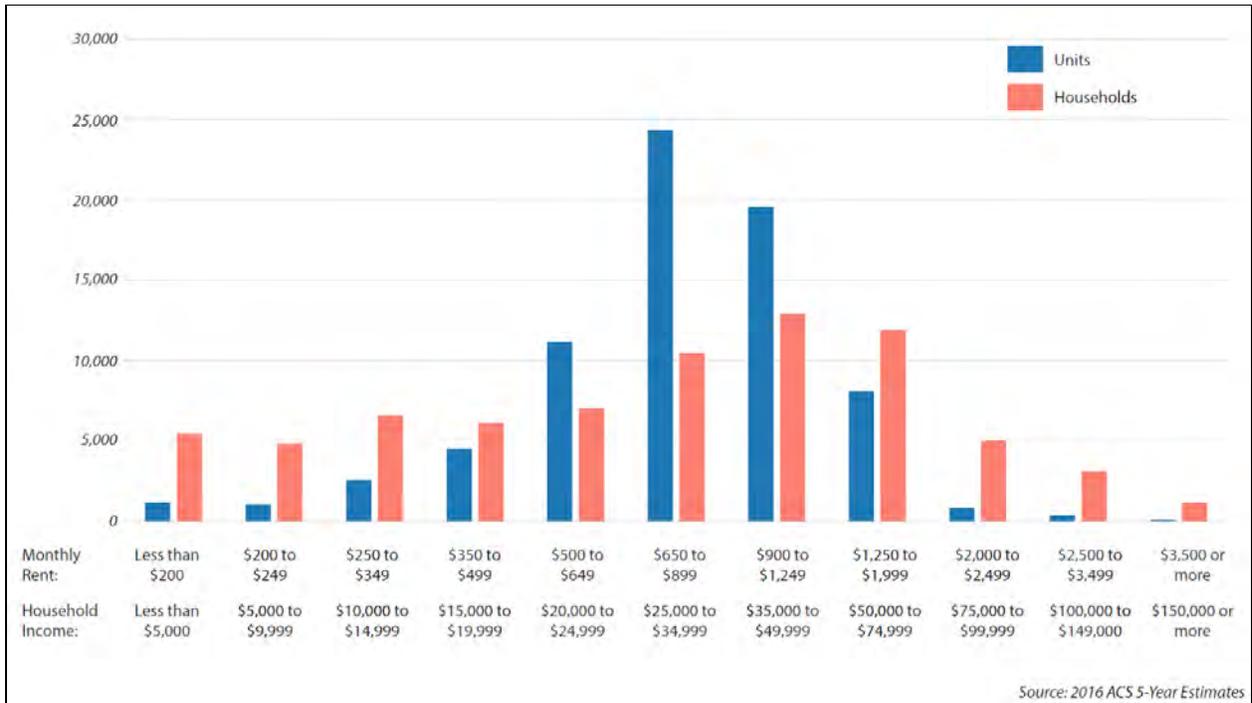
In Bellevue, the majority of households are homeowners, or 67.6 percent. This is similar to the region with a homeowner rate of 66.7 percent. Whites and Other non-Hispanic races are more likely to own their home while Blacks, Hispanics, Asian and Native Americans are more likely to rent. Blacks are two times more likely to rent than own a home, which is similar for Native Americans. This is similar to the surrounding region, except for Hispanics which are more likely to own in Bellevue rather than the surrounding area.

2. Additional Information

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

OMAHA

Figure V -104 Omaha Comparison of Units of Rent to Number of Households by Income



Source: U.S. Census Bureau, 2016 ACS Data (5yr)

Figure V-104 above compares the number of rental units available in Omaha by price range in blue, and average annual household incomes of renters in red. The graphs paired side by side show the number of rental units (to the far left) that would be available at a monthly rental rate considered affordable (at or near 30%) for the corresponding household incomes (locate below each pair of graphs).

According to the data, there is a shortage of rental housing that would be affordable for households earning \$19,000 annually or less. There is also a lack of units that are priced at or near 30% for households who earn \$50,000 to \$150,000 or more. The mismatch is more significant for households earning less than \$9,999 and more than \$75,000.

For households who earn between \$20,000 and \$49,000, many more units are priced in a range considered affordable. However, it is likely that many of the households earning \$75,000 to \$150,000 or more are renting units priced at a monthly rate that is less much than 30% based on the lack of units that are available at \$2,000 or more a month. With an average annual household income in Omaha of \$50,827, it is likely that many persons are renting below affordability. In addition, many of the households who make \$19,000 are likely renting units that are more than 30% of their annual household income because of the lack of housing available for their households.

The shortage of rental units for households making less than \$19,000 annually may be impacting minority households at a higher rate than white households in Omaha. Although the specific data on race/ethnicity for renter households is not provided, as discussed in previous sections, minority households are twice as likely to rent rather than to own their home. HUD maps identifying affordability of rental housing show the most affordable units are located in areas (east of 42nd Street) with high concentrations of non-white households. The highest rates of unemployment and poverty have also been identified in R/ECAPs (Racially and/or Ethnically Concentrated Areas of Poverty). It is likely that the lack of affordable rental units for low income households is disproportionately impacting minority families in the Omaha area.

Additional considerations for protected classes and disproportionate housing needs include the lack of affordable housing for large families and accessible housing for the disability community. As mentioned in previous sections, Omaha has a large refugee and new immigrant population. Based on interviews and meetings with persons working to assist these populations, there is a need for affordable housing that would accommodate large families and multi-generational families. According to Table V-44 shown at the beginning of this section, only 4.9% of the units available in Douglas County have 5 bedrooms or more. Challenges to preserving and creating more housing that can accommodate large families were discussed in stakeholder meetings. The rehabilitation cost of the current housing stock with 5 bedrooms or more is very expensive, especially for older housing stock that often requires considerations for lead and asbestos. New construction of homes with 5 bedrooms or more for low to moderate income families is difficult to produce at affordable costs even when including support from federal housing subsidies.

The disability community is also experiencing issues with housing security. According to the Douglas County Housing Authority, apartments that are subsidized and accessible for persons with disabilities under the age of 62 generally have longer waiting lists. There are more units available for people over the age of 62 regardless of disability status. In the recent decade, private landlords that are willing to accept Housing Choice

Vouchers (HCV) have been decreasing. With disability preference for HCV, as well as limited income, some disabled HCV still struggle to find housing in all areas. With there being only a limited number of landlords accepting this voucher as well as high housing costs, it can be difficult for the lowest income SSI person with a disability to meet the payment standard of those developments in the DCHA jurisdiction (west of 72nd St).

COUNCIL BLUFFS

It is very relevant within the Municipal Housing Agency’s Housing Choice Voucher Program that the City of Council Bluffs does not have enough homes to accommodate larger families. Those who have applied for the Municipal Housing Agency’s Housing Choice Voucher program are refugees who tend to have larger families. They struggle to find suitable, affordable housing to accommodate their larger families. The majority of housing that is available in the City of Council Bluffs is one-bedroom, two-bedroom, three-bedroom and four-bedroom homes.

BELLEVUE

Lending practices impact disproportionate housing needs. The Home Mortgage Disclosure Act (HDMA) data provided by the Consumer Financial Protection Bureau for 2015 was used to review home loan purchase approvals and denials to assist with identifying disparities in access to financial services. The Table below describes the loan denial rate by race in Bellevue.

Figure V -58 Home Loan Origination Bellevue

Home Mortgage Disclosure Act Data for 2015					
Race	Total Loan Request	% of Total Loan Request	# of Originated Loans	# of Applications Denied	Denial Rate
White	1,251	71.4%	1,172	79	6.3%
Black or African American	61	3.5%	57	7	11.4%
Asian	25	1.4%	23	2	8.0%
American Indian/Alaska Native	4	0.2%	4	0	-
Native Hawaiian or Other Pacific Islander	9	0.5%	9	0	-

Information not provided by applicant	109	6.2%	93	16	14.7%
Not applicable	294	16.8%	294	-	-
Total	1,753	100%	1,652	104	

SOURCE: HDMA 2015

With such a significant number of applicants not providing information and not applicable, the percentage of loan request by race is difficult to accurately determine. Of those who provided information, individuals who identified as white had the highest number of loan request with 71 percent followed by Blacks with 3.5 percent. Individuals who identified as American Indian and Native Hawaiian had a 0 percent denial rate while Blacks had a denial rate of 11 percent. White applicants experienced a denial rate of 6 percent.

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

OMAHA

OHA

Non-family heads of household (HHs) represent more than one-third of total HHs in our region. These are single-person HHs or HHs of 2+ unrelated persons. This population has disproportionately high housing needs: 40% of these HHs experience one of 4 housing problems; 18% experience severe housing cost burden. Single-person HHs (and other families who require only 1 bedroom) represent 40%+ of OHA's public housing list. OHA's waiting lists are good indicator of housing needs for low income families in the metro area.

In Omaha, persons with criminal backgrounds have been identified as a population struggling to establish housing security. This population will have difficulty meeting screening requirements for OHA (and likely other publicly subsidized housing) and may have limited affordable housing options otherwise.

DCHA

At DCHA waiting lists for units of 3 and 4 bedroom status are very long, often taking years before a unit has become available. Applicants often accept smaller unit that still meets occupancy standards as it is available long before the appropriate size unit is.

COUNCIL BLUFFS

The City and the Municipal Housing Agency received a great deal of feedback that there is a lack of affordable units in a range of sizes. The City of Council Bluffs and the Municipal Housing Agency have developed a goal, alongside the regional partners throughout Omaha to address the issue of lack of availability of affordable units in a range of sizes.

BELLEVUE

According to the 2011-2015 ACS, the majority of housing units in Bellevue have 3 bedrooms or less. These units make up 81% of the housing units available. Only 19% of housing units in Bellevue have 4 bedrooms or more. The number of housing units with more than four bedrooms is limited and affects larger families' ability to find affordable housing units.

3. Contributing Factors of Disproportionate Housing Needs

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

OMAHA

- Availability of affordable units in a range of sizes
- Deteriorated and abandoned properties
- Lack of access to opportunity due to high housing costs
- Lack of private investments in specific neighborhoods
- Source of income discrimination
- Lending discrimination
- Displacement of residents due to economic pressures

COUNCIL BLUFFS

Disproportionate Housing Needs

1. Lack of affordable, accessible housing in a range of unit sizes
2. The availability of affordable units in a range of sizes
3. Impediments to mobility
4. Private Discrimination
5. Lack of local or regional cooperation

BELLEVUE

Availability of affordable units in a range of sizes:

Smaller families with fewer than five members are much less likely to have housing problems than large family and non-family households. With limited numbers of public housing units available, families of five or more may face more housing problems than small families.

According to the 2011-2015 ACS, the majority of housing units in Bellevue have 3 bedrooms or less and make up 81% of the housing units available. Only 19% of housing units in Bellevue have 4 bedrooms or more. The number of housing units with more than four bedrooms is limited and affects larger families' ability to find affordable housing units.

Native American households while the smallest racial group in Bellevue face the highest percentage of severe housing cost burden and housing problems. Native American households are also more likely to renter than own.

The City of Bellevue has assistance for elderly and disabled owner-occupied households to address housing rehabilitation such as kitchen and plumbing issues, but this does not assist with overcrowding or cost burden.

Overall, Bellevue lacks available public housing. HUD Table 6 states that Bellevue has a total household of 19,216 households in the jurisdiction with 2,445 households, or 12.7%, with of income 50% below the area median income. There are only 454 publicly supported housing units in Bellevue, which is substantial lower than the households that would qualify for assistance. According to Bellevue Housing Authority, the placement of larger families is difficult due to limited available units with four bedrooms or more.

Lending Discrimination:

HDMA data shows that Black applicants have a denial rate almost twice that of White applicants. Black households are twice as likely to rent rather than own a home. Of the total Black households in Bellevue 10% are renters and 5% are homeowners.

Black households are scattered through the jurisdiction, with no data indicating segregated areas of Black households nor a significant number of Black households in the areas of higher poverty. Data does show that Black households below the federal poverty line have less access to school and lower indices regarding labor market engagement. As identified above, Black Households are more likely to live in high poverty neighborhood

Lack of private investment in specific neighborhoods:

With focus on the future growth of the Highway 34 corridor in southern Bellevue, the City will have to look at additional housing, job trainings, and transportation options to encourage development and employment opportunities. The majority of the established areas, specifically north of Olde Towne Bellevue and east of Fort Crook Road, are residential zoned and have limited commercial and retail space. Development in the older eastern areas of Bellevue are limited by lot availability/size and commercial zoning availability.

Source of Income Discrimination: Many Housing Choice Voucher holders have a hard time finding appropriate housing that will lease to Voucher Holders. Despite education and outreach from the Housing Authority staff, this continues with several large management companies in the jurisdiction.

C. Publicly Supported Housing Analysis

1. Analysis

This section provides the HUD-required analysis of publicly supported housing programs located in the jurisdiction of Omaha and the Omaha/Council Bluffs region. More than 11,000 households in the region receive publicly supported housing assistance. Nearly 75% of these assisted households reside within the jurisdiction of Omaha. This section examines the characteristics of assisted households and their location, within the jurisdiction and the region, for the purpose of identifying barriers to housing choice, and more importantly, to guide planning for actions to expand housing choice and access to opportunity for our region’s low-income families.

This analysis generally relies on the HUD-provided data from HUD’s AFFH maps and tables. The data provided by HUD for publicly supported housing programs has limitations, as HUD has acknowledged.

Where HUD’s data is inconsistent with local knowledge or other local sources, our analysis notes the discrepancies. For our region, we’ve generally found that even where the HUD data has limitations, it supports the same conclusions that we would determine based on local knowledge and local data sources. There may be discrepancies in the precise counts or percentage points but, unless these discrepancies are significant, this analysis relies on the HUD provided data.

Important Definitions for Public Housing Discussion			
AMI	Area Median Income (Middle Household Income)	LIHTC	Low Income Housing Tax Credits
BHA	Bellevue Housing Authority	MHA	Council Bluffs Municipal Housing Authority
DCHA	Douglas County Housing Authority	OHA	Omaha Housing Authority
FMR	Fair Market Rent	PBV	Project Based Voucher
HCV	Housing Choice Voucher	RAD	Rental Assistance Demonstration
HQS	Housing Quality Standards	R/ECAP	Racially and/or Ethnically Concentrated Areas of Poverty

a. Publicly Supported Housing Demographic

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

OMAHA

OHA:

Publicly supported housing serves more than 8,000 households in the Omaha jurisdiction. More than 85% of these households are assisted through the HCV and public housing programs. These two programs predominantly serve Black households. Black households represent 73% of HCV program participants and 68% of public housing households.

White households are more likely to be served by the jurisdiction’s project-based Section 8 and other multi-family housing programs. However, within the jurisdiction of Omaha, these programs comprise only approximately 1,100 households, less than 15% of the jurisdiction’s public supported households.

Hispanic households are under-served in every publicly supported housing program, as are Asian/Pacific Islander households (discussed more fully in Section C.1.a.iii.). The number of Asian/Pacific Islander households served by the jurisdiction’s publicly supported housing programs is too small (12 households) to provide comparisons between the programs.

Table V-59 Omaha Race/Ethnicity of Publicly Supported Households by Program

	WHITE	BLACK	HISPANIC	ASIAN/PI	TOTAL	% TOTAL
PUBLIC HOUSING	24%	68%	6%	0.38%	2,626	31%
PROJECT-BASED SECTION 8	64%	27%	8%	0.32%	938	11%
OTHER MULTIFAMILY	71%	25%	3%	0.00%	188	2%
HOUSING CHOICE VOUCHERS	24%	73%	3%	0.26%	4,636	55%
TOTAL	29%	65%	4%	0.30%	8,388	100%

Source: HUD Table 6 Publicly Supported Housing Residents by Race/Ethnicity

Table 2, below, is based on the same data as Table 1, but asks a different question: Given an assisted household's race or ethnicity, which program is likely to serve them? Among assisted households, both White and Black households are most likely to be served by the HCV program, which is appropriate, given that the HCV program is the largest source of publicly supported housing assistance in the jurisdiction. The percentage of White households and Black households receiving HCV program assistance is roughly 20% higher or more than their participation in the public housing program.

Hispanic households do not follow this trend. Hispanic households are more likely to be supported by the public housing program, and less likely to be supported by the HCV program.

Table V-60 Omaha Program Utilization by Race/Ethnicity of Assisted Households

	WHITE	BLACK	HISPANIC	ASIAN/PI	TOTAL	% TOTAL
PUBLIC HOUSING	26%	33%	44%	40%	2,626	31%
PROJECT-BASED SECTION 8	24%	5%	20%	12%	938	11%
OTHER MULTIFAMILY	5%	1%	1%	0%	188	2%
HOUSING CHOICE VOUCHERS	45%	62%	34%	48%	4,636	55%
TOTAL	100%	100%	100%	100%	8,388	100%

Source: HUD Table 6 Publicly Supported Housing Residents by Race/Ethnicity

DCHA:

Based on HUD maps it appears that overall there is a large amount of white tenants in other categories of publicly support housing. It appears that most of the black tenants are more densely populated in the Northeast service area while the Hispanic, Asian, and other multiracial people are more consistently throughout the entire service area. Trends in the statistics show a rapidly increasing Hispanic and Asian population.

According to DCHA 2017 annual report the following are the demographics of served population: 2,794 household participants (public housing and HCV) Reported ethnicity being 54% White, 40% African American, 5% Hispanic, and 1% other. 31% of

households employed part time, 24% employed full time, and 65% on Social Security income.

COUNCIL BLUFFS

The Municipal Housing Agency’s Public Housing properties are Dudley Court and Regal Towers. The MHA’s Public Housing properties mainly house elderly, disabled and near-elderly residents. The Municipal Housing Agency’s first preference for the waiting list is elderly and disabled individuals that currently reside in the city limits of Council Bluffs.

Figure V -61 Publicly Supported Households by Race/Ethnicity

(Council Bluffs, IA CDBG) Jurisdiction	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Public Housing	272	96.11%	5	1.77%	6	2.12%	0	0.00%
Project-Based Section 8	371	86.68%	27	6.31%	23	5.37%	3	0.70%
Other Multifamily	45	100.00%	0	0.00%	0	0.00%	0	0.00%
HCV Program	521	88.91%	43	7.34%	21	3.58%	1	0.17%
Total Households	22,328	91.06%	274	1.12%	1,428	5.82%	118	0.48%
0-30% of AMI	3,209	81.78%	125	3.19%	335	8.54%	24	0.61%
0-50% of AMI	5,594	75.76%	129	1.75%	570	7.72%	54	0.73%
0-80% of AMI	10,379	82.09%	154	1.30%	964	7.62%	68	0.54%

Note 1: Data Sources: Decennial Census; APSH; CHAS

Note 2: Numbers presented are numbers of households not individuals.

The Municipal Housing Agency manages no additional public housing units except for Dudley Court and Regal Towers. The Municipal Housing Agency does administer 677 housing choice vouchers and in addition, Municipal Housing Agency’s Housing Choice Voucher program has 20 VASH vouchers that are designated for homeless veteran applicants. The Municipal Housing Agency has strong ties with many different agencies throughout the community that provide support to those that are disabled and in need of assistance.

BELLEVUE

Table V-62 Publicly Supported Households by Race/Ethnicity

HUD AFFH Table 6 - Publicly Supported Households by Race/Ethnicity								
Bellevue, NE	Race/Ethnicity							
	White		Black		Hispanic		Asian/Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	28	66.67%	12	28.57%	1	2.38%	1	2.38%
Project-Based Section 8	217	73.06%	48	16.16%	24	8.08%	4	1.35%
Other Multifamily	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
HCV Program	75	63.03%	36	30.25%	5	4.20%	3	2.52%
Total Households	15,780	80.33%	1,299	6.61%	1,833	9.33%	304	1.55%
0-30% of AMI	1,435	70.86%	269	13.28%	184	9.09%	10	0.49%
0-50% of AMI	2,445	63.02%	364	9.38%	554	14.28%	65	1.68%
0-80% of AMI	5,370	71.46%	544	7.24%	924	12.30%	139	1.85%
Omaha-Council Bluffs Region	Race/Ethnicity							
	White		Black		Hispanic		Asian/Pacific Islander	
	#	%	#	%	#	%	#	%
Public Housing	1,824	31.13%	3,586	61.19%	327	5.58%	21	0.36%
Project-Based Section 8	2,157	71.21%	610	20.14%	212	7.00%	16	0.53%
Other Multifamily	380	76.00%	102	20.40%	10	2.00%	0	0.00%
HCV Program	2,533	38.80%	3,747	57.39%	186	2.85%	24	0.37%
Total Households	280,218	83.11%	25,625	7.60%	19,697	5.84%	5,864	1.74%
0-30% of AMI	25,922	65.39%	7,732	19.50%	3,616	9.12%	823	2.08%
0-50% of AMI	45,627	58.37%	12,616	16.14%	7,599	9.72%	1,668	2.13%
0-80% of AMI	93,097	67.59%	17,725	12.87%	12,532	9.10%	2,569	1.87%
<i>Note 1: Data Sources: Decennial Census; APSH; CHAS</i>								
<i>Note 2: #s presented are numbers of households not individuals.</i>								

Source: HUD Table 6 Publicly Supported Housing

As provided by the HUD data Table 6, White households are most likely to reside in project-based Section 8 housing with 73%, but also are the highest percentage to reside in Public Housing and Housing Choice Voucher Programs with 57% and 42% residency respectively. Black households are more likely to participate in housing choice vouchers with 40% while Hispanic households participate mostly in Project-Based Section 8. There are no “other-multi family” units listed for Bellevue.

Overall participation in Project Based Section 8 is roughly similar to the general population. In the HVC and Public Housing, Hispanics are underrepresented while Blacks are overrepresented.

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

OMAHA

OHA

In the Omaha/Council Bluffs region, more than 11,000 households receive publicly supported housing assistance. Omaha is the largest jurisdiction within the region, and nearly 75% of assisted households reside within the jurisdiction of Omaha. Only approximately 3,000 of the region's assisted households reside outside the jurisdiction of Omaha. Because the jurisdiction of Omaha represents such a predominant share of assisted households in the region, analysis of assisted households in the region leads to similar patterns as identified above for the jurisdiction. Thus Table 3, below, breaks down racial/ethnic demographics of the region's assisted households who reside within the jurisdiction of Omaha compared to households who reside outside the jurisdiction.

As Table 3 shows, outside the jurisdiction of Omaha, the region's publicly supported housing programs predominantly serve White households. White households represent roughly 79% of the of the region's assisted households who reside outside the jurisdiction of Omaha. This proportion is commensurate with the region's demographics, as described below in Section C.1.a.iii., which show that roughly 80% of the region's low income households who reside outside of the jurisdiction of Omaha are White households. But it is significantly different from the demographics of assisted households who reside within the jurisdiction of Omaha, above all for the public housing and HCV programs.

The HCV program is the largest source of housing assistance in the region—both within the jurisdiction of Omaha and outside the jurisdiction. Although White households represent the large majority of the region's assisted households who reside outside the jurisdiction of Omaha, roughly 20% of households who are assisted by the HCV program and who reside outside the jurisdiction are Black households. Also note that the percentage of Hispanic households assisted by the HCV program is largely identical (3%) both within the jurisdiction and outside the jurisdiction.

Table V-63 Comparing Region and Jurisdiction Race/Ethnicity of Publicly Supported Housing

	WITHIN OMAHA JURISDICTION				OUTSIDE OMAHA JURISDICTION				OMAHA REGION TOTAL			
	W	B	H	Total	W	B	H	Total	W	B	H	Total
PUBLIC HOUSING	24%	68%	6%	2,626	92%	5%	2%	325	31%	61%	6%	2,951
PROJECT BASED SECTION 8	64%	27%	8%	938	81%	10%	6%	725	71%	20%	7%	1,663
OTHER MULTIFAMILY	71%	25%	3%	188	92%	6%	0%	62	76%	20%	2%	250
HOUSING CHOICE VOUCHERS	24%	73%	3%	4,636	76%	20%	3%	1,893	39%	57%	3%	6,529
TOTAL	29%	65%	4%	8,388	79%	16%	4%	3,005	42%	52%	4%	11,393

Source: HUD Table 6 Publicly Supported Housing Residents by Race/Ethnicity

The Omaha/Council Bluffs region includes more than 335,000 households. White households represent the large majority (83%) of the region’s households. White households also represent the large majority of the region’s low-income households: roughly 68% of the region’s households with income less than 80% of AMI are White. Black households and Hispanic households represent a small proportion of the region’s households (8% and 6%, respectively), but are more likely to be low-income. Although Black households represent only 8% of the region’s population, they represent 13% of households with incomes less than 80% of AMI. Hispanic households represent roughly 6% of the region’s households, but roughly 9% of the region’s low income households.

The City of Omaha is the largest jurisdiction within the region, and represents roughly half of the region’s households. White households represent the majority of low-income households within the City. But Black and Hispanic households represent a disproportionate share of the jurisdiction’s low-income households. Black households represent 13% of the jurisdiction’s households, but 20% of the jurisdiction’s low-income households, and 28% of extremely low income households (AMI 0-30%). Hispanic households represent 8% of the jurisdiction’s households, but roughly 11% of the jurisdiction’s low-income households. The jurisdiction of the City of Omaha is home to

roughly half of the region’s households and roughly 75% of the region’s assisted households.

Table V-64 Regional and Jurisdiction Comparison of Public Housing Demographics

	WITHIN OMAHA JURISDICTION				OUTSIDE OMAHA JURISDICTION				OMAHA REGION TOTAL			
	W	B	H	TOTAL	W	B	H	TOTAL	W	B	H	TOTAL
PUBLIC HOUSING	24%	68%	6%	2,626	92%	5%	2%	325	31%	61%	6%	2,951
PROJECT BASED SECTION 8	64%	27%	8%	938	81%	10%	6%	725	71%	20%	7%	1,663
OTHER MULTIFAMILY	71%	25%	3%	188	92%	6%	0%	62	76%	20%	2%	250
HOUSING CHOICE VOUCHERS	24%	73%	3%	4,636	76%	20%	3%	1,893	39%	57%	3%	6,529
TOTAL ASSISTED HHs	29%	65%	4%	8,388	79%	16%	4%	3,005	42%	52%	4%	11,393
TOTAL HOUSEHOLDS	75%	13%	8%	167,107	91%	2%	4%	170,063	83%	8%	6%	337,170
LOW INCOME HHs 0-30% AMI	55%	28%	11%	25,427	85%	5%	6%	14,216	65%	20%	9%	39,643
LOW INCOME HHs 0-50% AMI	50%	24%	12%	48,707	72%	3%	6%	29,466	58%	16%	10%	78,173
LOW INCOME HHs 0-80% AMI	58%	20%	11%	80,649	81%	3%	6%	57,077	68%	13%	9%	137,726

Source: HUD Table 6 Publicly Supported Housing Residents by Race/Ethnicity

White households represent approximately 68% of the region’s low income households, and roughly 58% in the jurisdiction of Omaha. Overall, white households are under-served by publicly supported housing programs within the jurisdiction: Only 29% of assisted households in the jurisdiction are White, even though white households represent 58% of the jurisdiction’s low income households. This is particularly true of the public housing and HCV programs in the jurisdiction, in which White households represent only roughly 24% and 29% of households served, respectively. White households are proportionately served by the jurisdiction’s project-based Section 8 and other multi-family housing programs, but these represent a fairly small proportion of the jurisdiction’s assisted housing. However, outside the jurisdiction of Omaha, White households are proportionately served by the region’s publicly supported housing programs.

Hispanic households represent 9% of the region's low income households, and roughly 11% of low income households who reside in the jurisdiction of Omaha. Hispanic households are under-served by the region's publicly supported housing programs, both in the jurisdiction of Omaha and outside the jurisdiction.

Black households represent 13% of the region's low income households, and 20% of low-income households who reside in the jurisdiction of Omaha. Black households represent a disproportionate share of extremely low income households (households with income at 0-30% of AMI): 20% of the region's extremely low income households are Black, and 28% of the jurisdiction's extremely low income households. The region's publicly supported housing programs predominantly serve Black households. Fifty-two percent of the region's assisted households are Black. Within the jurisdiction of Omaha, 65% of assisted households are Black

DCHA:

Census data shows DCHA jurisdictional area to historically and currently to be predominantly white, with few minority populations. Based on map 2, all minority populations are sparse in this area. However, it can also be noted that there does not appear to be significant pockets of settlement but rather minorities are sparsely represented throughout the entire DCHA jurisdiction. Also relative to the historical lack of integration over the past 30 years, it does appear to be improving statistically by percentage, the same as other areas of Omaha even though overall rates are lower than much of the East side of the city. While segregation appears to be high, this is an area of opportunity with barriers in relation to housing availability and transportation needs.

According to HUD map 1 and 2, the area code 68134 is an area within DCHA jurisdiction where minorities, particularly Black, Non-Hispanic, seem to integrate in the western part of Omaha, and this is expected to continue. However, other minority populations of Hispanic, Asian or Pacific Islander, Non-Hispanic, Native American, Non-Hispanic, and Other are more sporadically integrating in the DCHA service area.

COUNCIL BLUFFS

According to data tables provided by HUD for Publicly Supported Households by Race/ Ethnicity, the following are the demographics found:

For Public Housing the breakdown of Race/ Ethnicity is:

White	96.11%
Black	1.77%
Hispanic	2.12%
Asian or Pacific Islander	0.00%

For Project-Based Section 8 the breakdown of Race/ Ethnicity is:

White	86.68%
Black	6.31%
Hispanic	5.37%
Asia or Pacific Islander	0.70%

For Other Multifamily the breakdown of Race/ Ethnicity is:

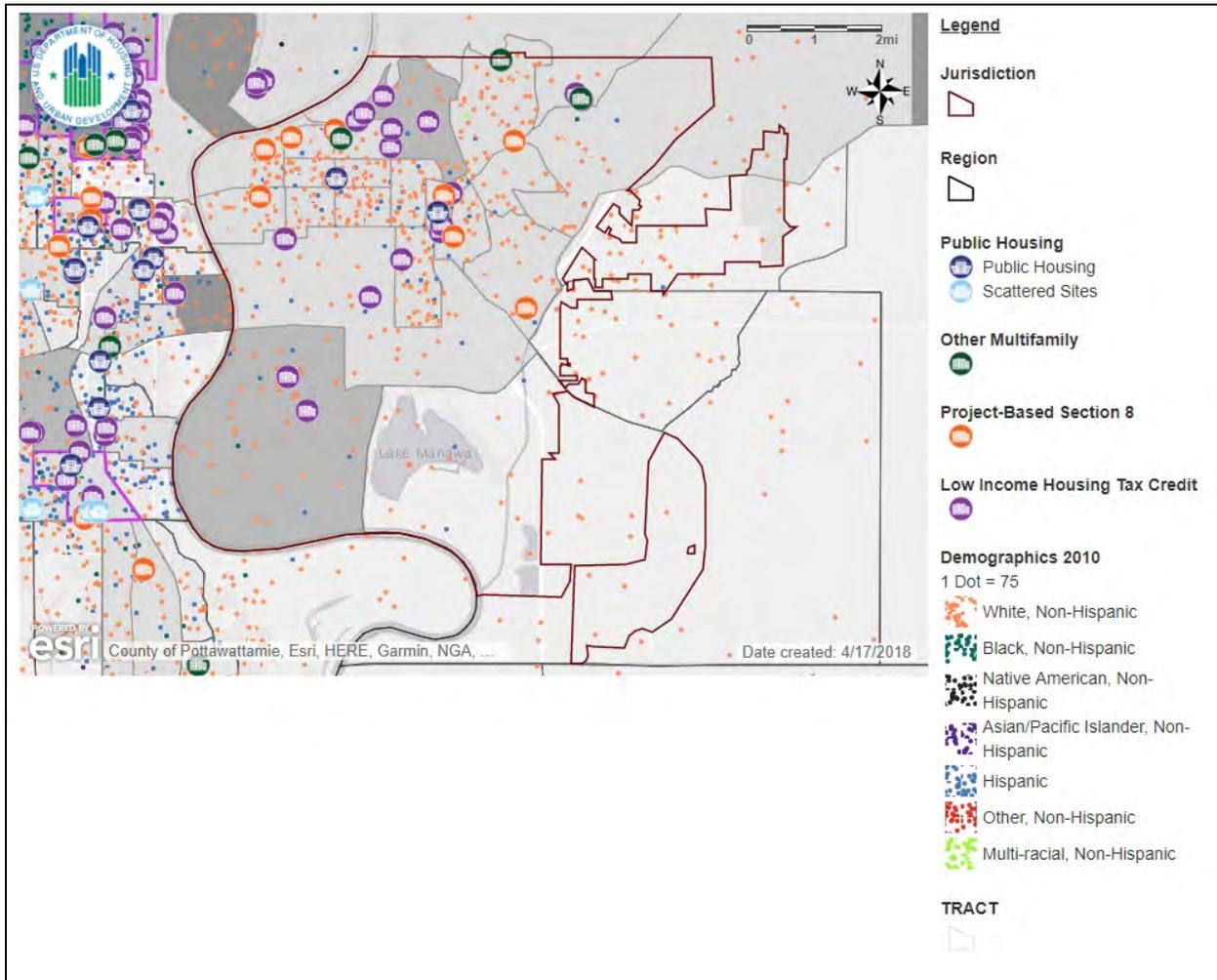
White	100.00%
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For Housing Choice Voucher Program the breakdown of Race/ Ethnicity is:

White	88.91%
Black	7.34%
Hispanic	3.58%
Asian or Pacific Islander	0.17%

Throughout the city of Council Bluffs, there are 41,510 households, out of those households 91.06% consist of White residents, 1.12% consist of Black residents, 5.82% consist of Hispanic residents and 0.48% consist of Asian or Pacific Islanders. Although there are significantly less residents that fall into protected classes, there is something that is largely noticeable about the city of Council Bluffs; over half of the population of White residents fall within the extremely low to moderate-income category. Therefore, the city of Council Bluffs has a significant difference from other areas within its region; while the city of Omaha may see a larger number of families that fall into protected classes that are in the extremely low to moderate-income category, this is not the case for the city of Council Bluffs.

Figure V -105 Publicly Supported Housing and Race/Ethnicity



Source: HUD Map 5 Publicly Supported Housing

BELLEVUE

When comparing Bellevue publicly supported housing data to the Omaha-Council Bluffs region, Project-Based Section 8 is very similar. For both the Public Housing and HCV Program, the region as a whole has more Black household participation than Bellevue. Hispanic households participate slightly more in the public housing program in the region than in Omaha.

Eligibility for housing assistance is based on income and households must earn less than 50% of the area median income to qualify although the threshold can be higher depending upon the program. When looking at the racial and ethnic make up of the households participating in publicly supported housing, the households have a very

similar racial and ethnic breakdown as the general population.

According to HUD Table 6, the number of Bellevue residents living at or below 50% of the area median income are:

- White – 2,445 (15.5% of total White households)
- Black – 364 (28% of total Black households)
- Hispanic – 554 (30% of total Hispanic households)
- Asian or Pacific Islander - 65 (21% of total Asian or Pacific Islander population)

The total population of households living at or below 50% of the AMI is 3,428 while the total number of publicly supported housing programs is only 454, providing housing for only 13% of those that qualify. The chart below shows the percentage of income eligible households that are participating in publicly supported housing programs. While 30% of Hispanic households income qualify, only 5% currently participate in housing assistance programs.

Table V-65

HUD Table VI. Publicly Supported Housing Residents by Race/Ethnicity (#)						
Race/Ethnicity	Public Housing	Project Based Section 8	Other Multi-Family	HCV Program	TOTAL	% of Income Eligible in Publicly Supported Housing (based on 50% MFI)
White	28	217	-	69	314	12.84%
Black or African American	12	48	-	67	127	34.89%
Hispanic	7	24	-	20	51	9.21%
Asian	2	4	-	11	17	26.15%
Total	49	293	-	167	509	14.84%

SOURCE: Decennial Census; APSH; CHAS

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

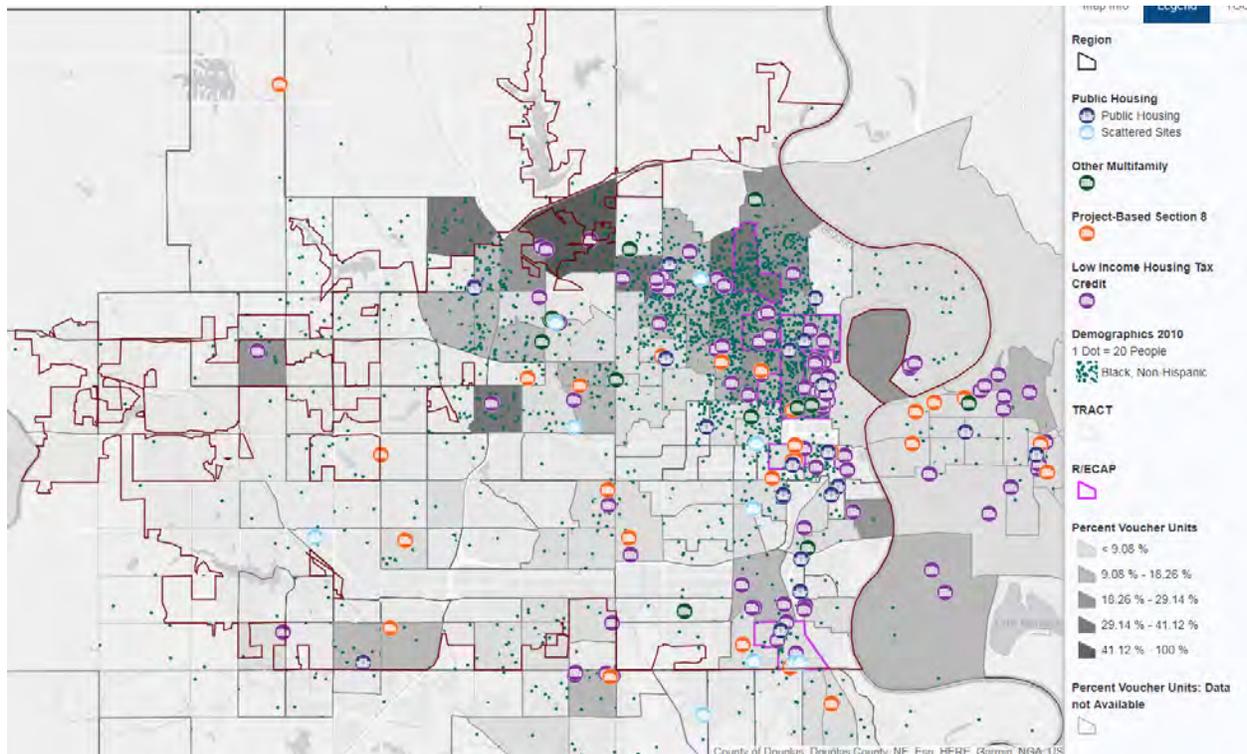
OMAHA

OHA

HUD data indicate that R/ECAP areas exist in 9 of the region's Census Tracts. All 9 of the R/ECAPs are located within the jurisdiction of the City of Omaha and are located in east Omaha--north and south of Omaha's downtown.

Seven of the R/ECAPs are clustered north of Omaha's downtown in Omaha's historically black neighborhoods. In the past twenty years, there has been significant redevelopment in northwest Omaha, with new housing and business, which has provided opportunities to North Omaha families. The concentration of black families in Omaha has expanded west, but predominantly remains north of Dodge Street.

Figure V -106 Omaha Black Households, R/ECAPS, & Publicly Supported Housing

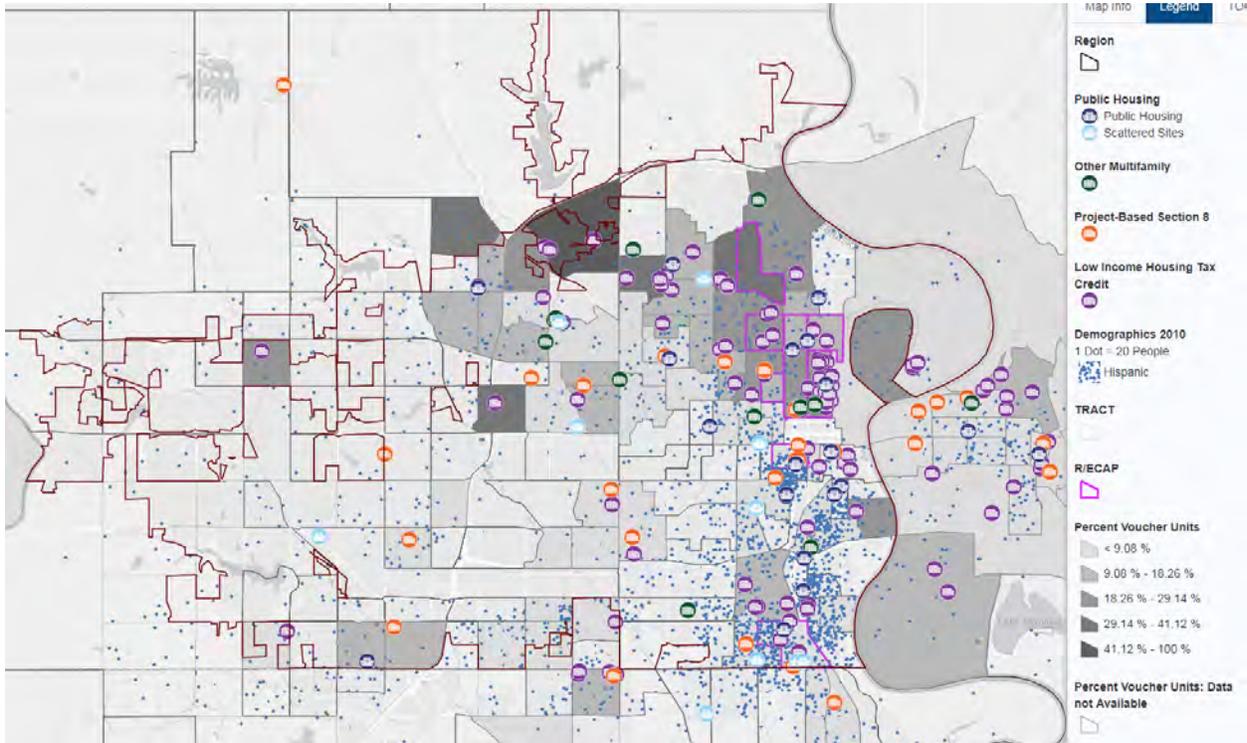


Source: HUD Map 5 Publicly Supported Housing and Race/Ethnicity: Black, NH Demographic Only, Dot Density 1:20

An eighth R/ECAP is located just south and west of downtown, in a neighborhood that historically has had a reputation as “rough” and very low-income but, currently, is surrounded by vibrant redevelopment of Omaha’s Midtown and surrounding neighborhoods. The ninth R/ECAP is isolated near the southeast border of the jurisdiction and located in south Omaha. South Omaha’s neighborhoods have become predominantly Hispanic, and traditionally have been considered Omaha’s “ethnic” neighborhoods (whether Polish, Italian, Hispanic etc), in part because of their historical proximity to the stockyards.

While these 2 south R/ECAPs appear isolated, they are located in neighborhoods that are predominantly Hispanic. The concentration of Hispanic residents extends beyond Omaha’s jurisdiction to cities south and east, particularly Bellevue, and has grown north toward Omaha’s downtown.

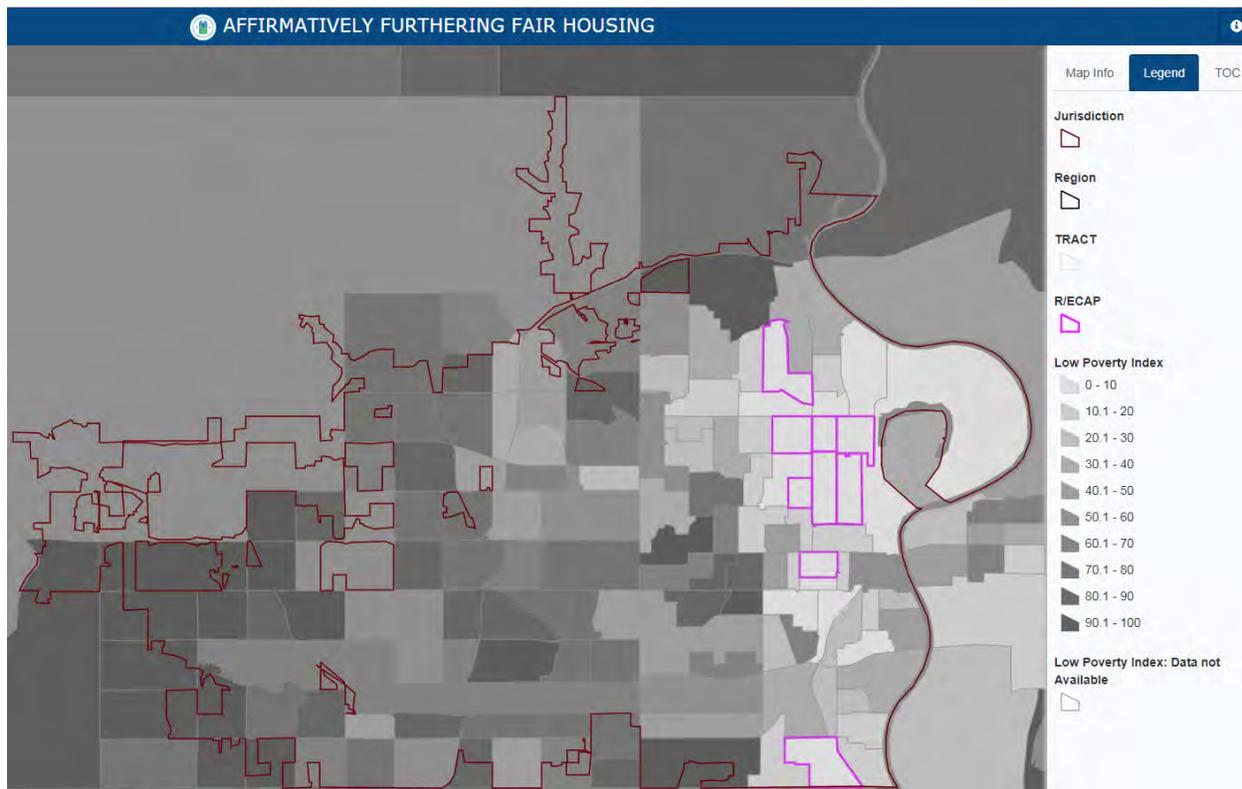
Figure V -107 Omaha Hispanic Households, R/ECAPS, & Publicly Supported Housing



Source: HUD Map 5 Publicly Supported Housing and Race/Ethnicity: Hispanic Demographic Only, Dot Density 1:20

The concentration of Black and Hispanic families corresponds with concentrations of poverty. This map shows a broad white swatch extending north to south through east Omaha, which reflects high concentration of poverty. The highest concentration of poverty encompasses the R/ECAPs, as well as their surrounding neighborhoods, which are the neighborhoods with concentration of Black and Hispanic households. In north Omaha, the concentration of poverty is expanding west.

Figure V -108 Omaha Access to Low Poverty Neighborhoods



Source: HUD Map 12 Low Poverty Index

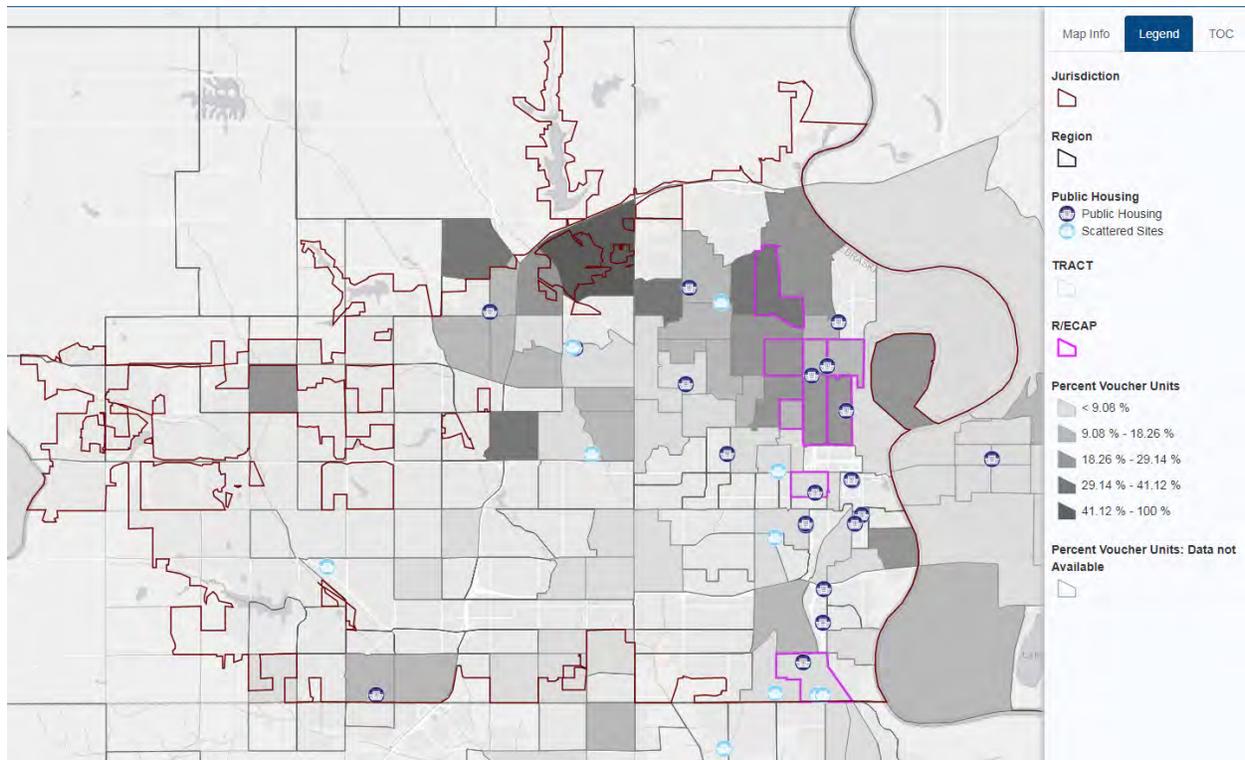
Per HUD data, there are approximately 11,400 households in the region who reside in publicly assisted units. The majority of these households, approximately 8,300, reside within the jurisdiction of Omaha. 1,984 assisted households reside within R/ECAP areas. This represents roughly 24% of Omaha's assisted households, and roughly 17% of the region's assisted households.

Only a handful of Omaha's public housing developments are located within the R/ECAP areas, but these tend to be large developments, and these developments contribute to the concentration of poverty in neighborhoods that are racially/ethnically segregated. OHA has three large public housing developments with larger bedroom-size units for families with children: Southside Terrace, Spencer Homes, and Chambers Court. All three are located within R/ECAP areas. In addition, the R/ECAP areas include two large public housing developments, Jackson Tower and Evans Tower, with efficiencies and one-bedroom apartments. These five public housing developments located within the R/ECAPs represent roughly 30% of the public housing units in the region.

While the large majority (roughly 70%) of Omaha's public housing units are located

outside of the R/ECAPs, the location of Omaha’s public housing developments tends to correspond with the neighborhoods of minority concentration. Nearly every public housing development is located east of 72nd Street, and the vast majority are located east of 50th Street. The developments likely create or contribute to the concentration of poverty in these neighborhoods, and they track with the concentrations of poverty.

Figure V -109 Omaha Public and Scattered Site Housing

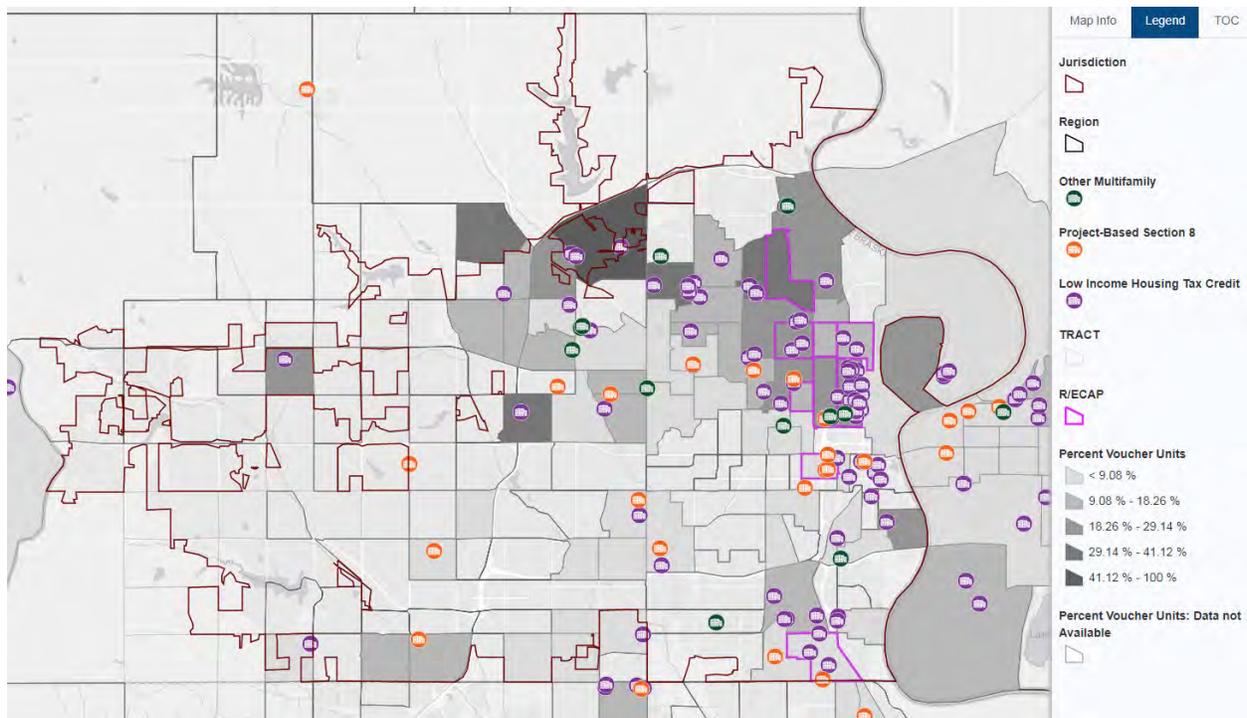


Source: HUD Map 5 Publicly Supported Housing; Public and Scattered Site Only

OHA’s scattered site public housing units are an exception. (Due to HUD’s asset management requirements, they are not represented on the HUD maps.) OHA has more than 600 units which are considered to be scattered sites, many are single family homes or duplexes. The majority were developed according to a settlement agreement that required that an equal number of scattered site public housing units be sited within each city council district. OHA’s scattered site public housing units located in north east Omaha are located in neighborhoods of high concentration of minorities and high concentrations of poverty—as are, though to a lesser degree, OHA’s scattered site public housing units sited in southeast and northwest Omaha. OHA also has 76 scattered site units located in southwest Omaha, which are sited outside of Omaha’s neighborhoods of high minority concentration and concentration of poverty.

The primary source of development of new affordable housing in the region—the project-based voucher program, other multi-family housing, and above all, Low Income Housing Tax Credit (LIHTC) units—are predominantly concentrated in the same neighborhoods as OHA’s public housing developments. These are the neighborhoods that contain or surround the R/ECAPs, with high minority concentrations and with high concentrations of poverty. The location of LIHTC developments, represented by purple dots, tracks almost identically with concentrations of poverty in Omaha. However, as the map below demonstrates, these programs have expanded west. The project-based voucher program has expanded publicly supported housing that is sited south and southwest Omaha.

Figure V -110 Omaha Project-Based Section 8, LIHTC, and Other Multifamily Housing

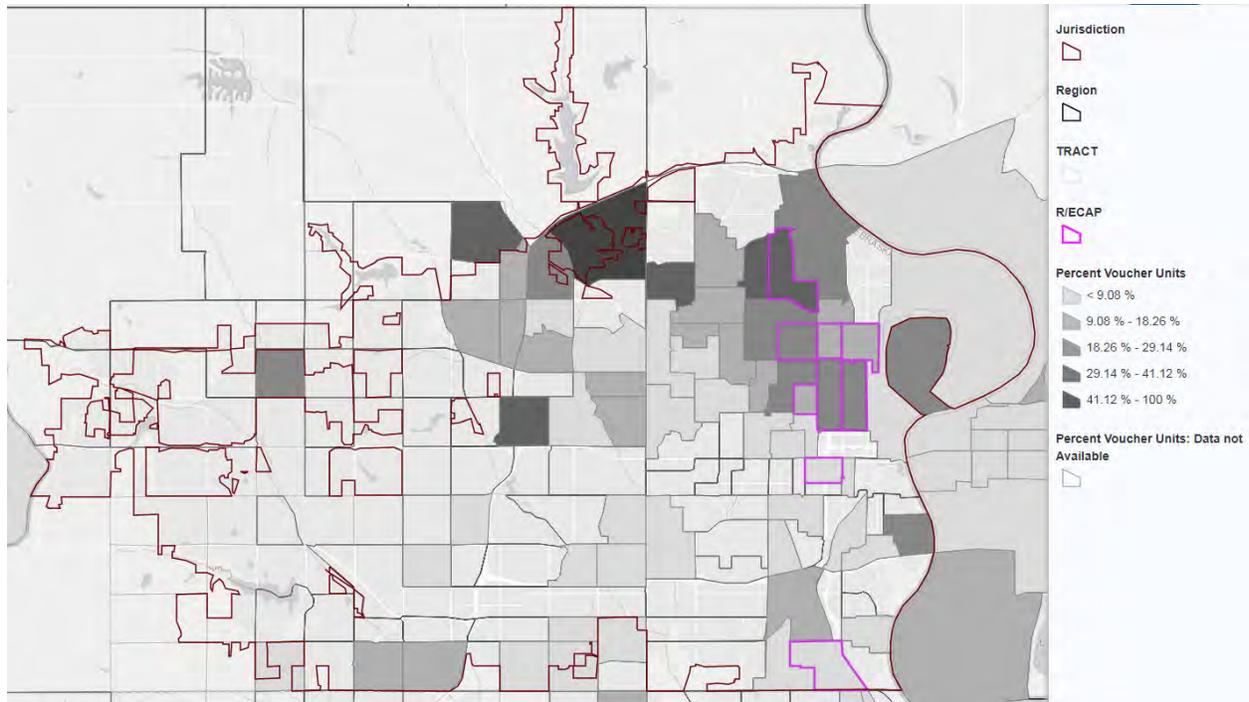


Source: HUD Map 5 Publicly Supported Housing; Project-Based Section 8, LIHTC, and Other Multifamily Housing Only

The HCV program is the largest publicly supported housing program in the region and in the jurisdiction. As the HCV program assistance is not site-based, the program is intended to expand low income families’ housing choice. Less than 20% of Omaha’s voucher holders reside within R/ECAP areas. Nonetheless the majority reside in the same neighborhoods that have high concentrations of minority households and high concentrations of poverty. Voucher utilization in Omaha follows the map of poverty

concentration and, particularly, the map of concentrations of Black households, as the majority of assisted families are Black.

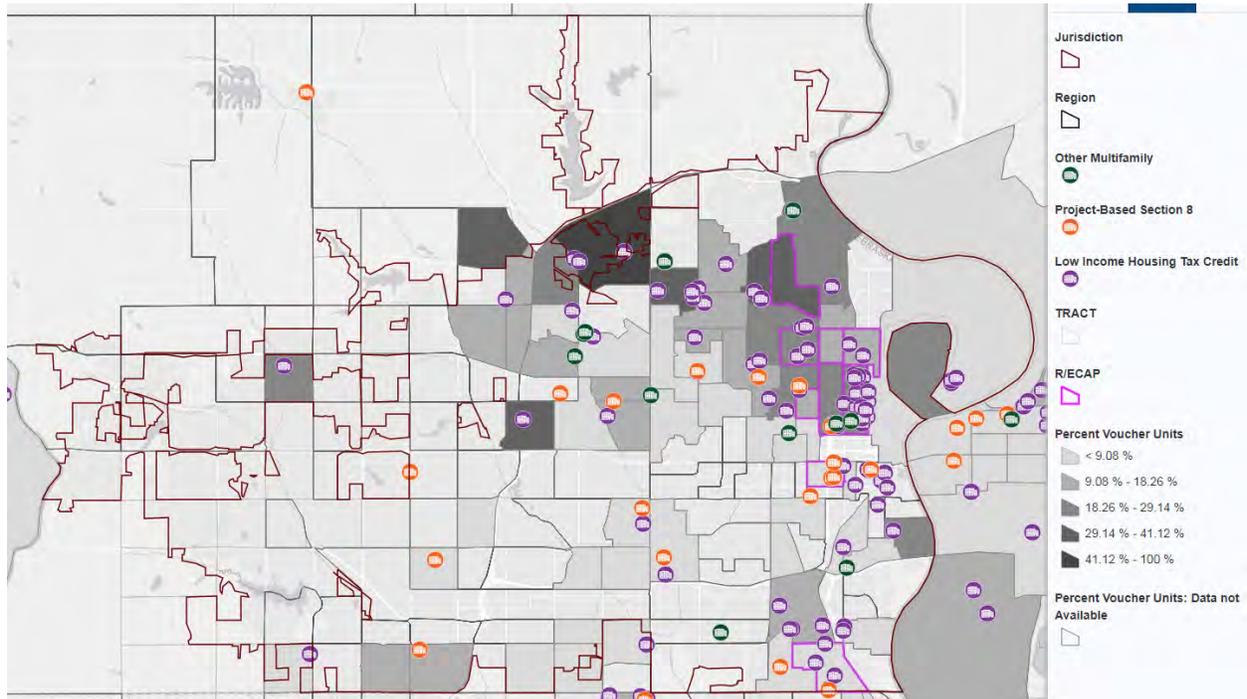
Figure V -111 Omaha Percentage of Voucher Units by Census Tract



Source: HUD Map 5 Publicly Supported Housing

The map above, showing voucher utilization, also shows a dozen or so tracts with higher voucher utilization located in southwest Omaha. This utilization tends to track with the development of other, site-based publicly supported housing, as shown in the map below, which includes project-based voucher developments, LIHTC developments, and other multi-family housing developments.

Figure V -112 Omaha Voucher Units, Other Multifamily , Project-Based Section 8, LIHTC



Source: HUD Map 5 Publicly Supported Housing

DCHA

DCHA, OHA, and BHA are the PHA's in the service area. Jurisdiction lines were established at 72nd Street and the Sarpy county line. All areas serve very different populations and demographics. OHA is in the jurisdiction of the R/ECAP. DCHA does not have any properties in the R/ECAP area. Map 5 provides further information about the publicly supported residents in the non-R/ECAP areas. Many of DCHA developments and projects are more rurally focused in the surrounding areas that are still within the service area.

DCHA properties include the following identifications:

PROJECT	LOCATION	PROJECT TYPE
<p>Benn View I 16 Apartment Units Property Code: bv1 Program Type: HUD New Const./ HAP</p> <p>Handicap units #1,2</p>	<p>15652 N. 4th Bennington Units 1-8 Units 9-16 Built 1981 570 sq ft</p>	<p>Section 8 New Construction NE26R000035</p>
<p>Benn View II 8 Apartment Units Property Code: bv2 Program Type: Rural Elderly</p> <p>Handicap = 0</p>	<p>15652 N. 4th Bennington Units 17-24 Built 1988</p> <p>570 sq ft</p>	<p>Owner is DCHA Section 8 project-based Vouchers used to subsidize the rent</p>
<p>North Acres 40 Apartment Units Property Code: na Program Type: HUD Low Rent</p> <p>Handicap Units # 7, 9, 43 & 45</p>	<p>54__ N. 108th St. Omaha 68164</p> <p>Built 1983</p> <p>602 sq ft</p>	<p>Low Rent NE153000006</p> <p>Flat Rent = \$635</p>
<p>Single Family Homes 38 Houses Property Code: sf Program Type: HUD Low Rent</p> <p>Handicap Unit: 15329 (Monroe)</p>	<p>Various locations (see property revised document)</p> <p>Built between 1978 and 1995</p>	<p>Low Rent NE153000006</p> <p>Flat Rent 3Bd = \$1,150 Flat Rent 4Bd = \$1,200</p>
<p>Valley Heights 16 Units Property Code: vh Program Type: Rural Elderly</p> <p>Handicap Unit #1</p>	<p>309-317 W. Meigs – Valley</p> <p>Built 1988</p> <p>570 sq ft</p>	<p>Owner is DCHA Section 8 project-based Vouchers used to subsidize the rent</p>
<p>Valley View 28 Units Property Code: vv Program Type: HUD New Const./ HAP</p> <p>Handicap units #5 & 8</p>	<p>400 W. Meigs Valley</p> <p>Built 1978</p> <p>585 sq ft</p>	<p>Section 8 New Construction NE26R000004 REAC Property ID 800013572</p>

<p>Woodgate 20 Units Property Code: wg Program Type: LIHTC</p> <p>Handicap Units: 10 2-bdrm/10 3-bdrm</p>	<p>78th & Whitmore Plaza</p> <p>2 Bed – 1356 sq ft 3 Bed – 1836 sq ft</p>	<p>LIHTC and NAHTF</p>
<p>Valley CROWN 12 – 3 bedroom / 2 story houses Property Code: vc Program Type: LIHTC</p> <p>Handicap Units: one house</p>	<p>102 – 123 West Condron St. Valley 1548 sq ft and 1472 sq ft</p>	<p>LIHTC and NAHTF</p>
<p>Gretna CROWN 15 – 4 bedroom / ranch houses Property Code: gc Program Type: LIHTC</p> <p>Handicap Units: one house</p>	<p>11208 So. 212th St. 11212 So. 212th St. 11302 So. 212th St. 11306 So. 212th St. 11310 So. 212th St. 11314 So. 212th St. 21108 Paradise Dr. 21112 Paradise Dr.</p>	<p>LIHTC 21116 Paradise Dr. 21120 Paradise Dr. 21109 Paradise Dr. 21113 Paradise Dr. 21117 Paradise Dr. 11219 So. 212th St. 11223 So. 212th St. Gretna, NE 1,550-1,700 Sq. Ft.</p>
<p>Platte Valley Apartments 48 Units Property Code: pv Program Type: LIHTC</p> <p>No Handicap Units</p>	<p>712 S. West St. 1 Bed - 650 Sq Ft 2 Bed - 937 Sq. Ft 3 Bed – 1300 Sq. Ft 25 1 bedroom 12 2 bedrooms 11 3 bedrooms</p>	<p>LIHTC and AHP Building #1 Unit 1-18 (BIN NE-96-00956) Building #2 Unit 19-30 (BIN NE-96-00957 Building #3 Unit 31-48</p>
<p>River Road Townhomes 14 – 2 bedrooms Property Code: RR Program Type: LIHTC</p> <p>Handicap Units: 14</p>	<p>23255 Denton 23257 Denton 23261 Denton 23263 Denton 23267 Denton 23269 Denton 23273 Denton</p>	<p>LIHTC – 23275 Denton 23267 Kelsey 23269 Kelsey 23275 Kelsey 23277 Kelsey 23291 Kelsey 23293 Kelsey</p>

COUNCIL BLUFFS

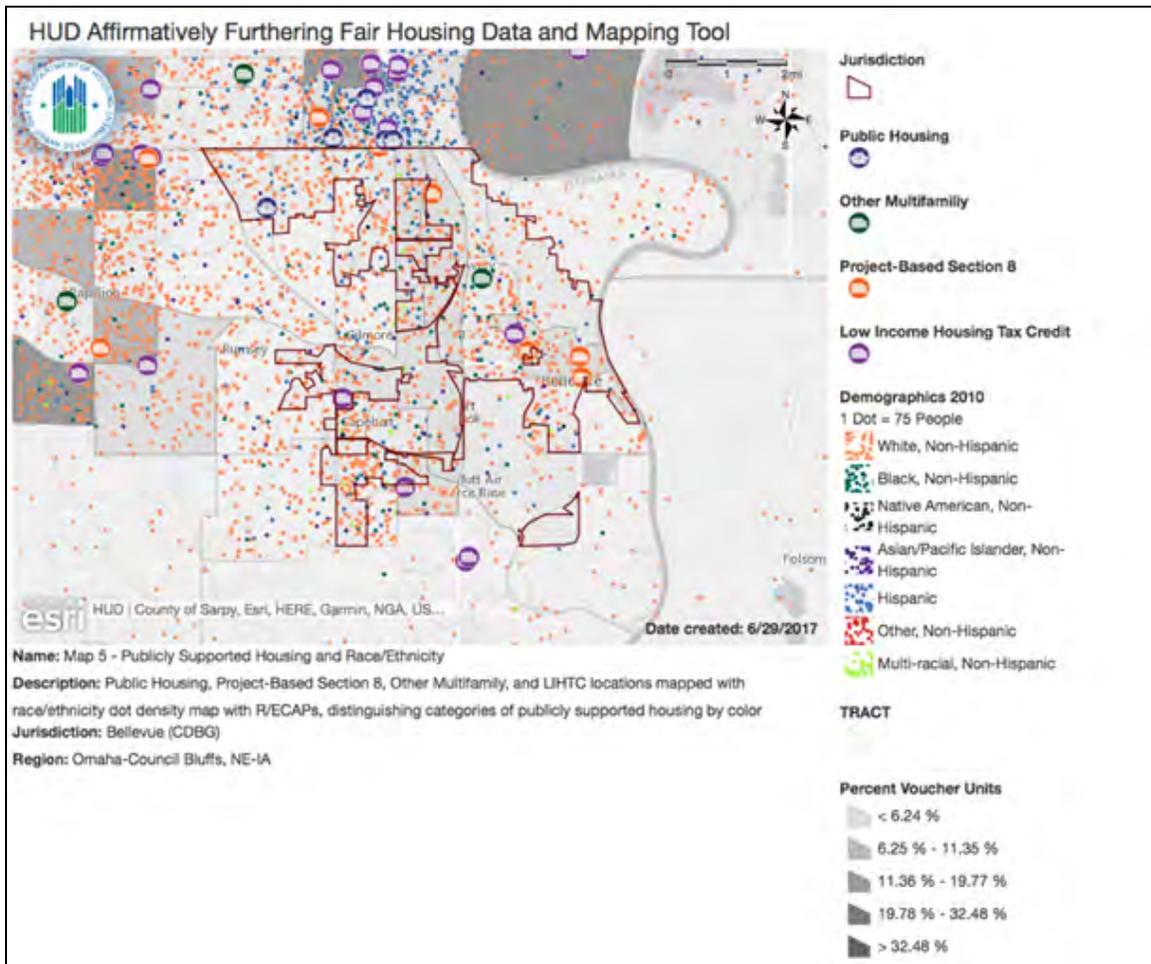
Publicly Supported Housing is spread throughout the city of Council Bluffs. There are many different properties located throughout the city that provide subsidized housing, along with voucher holders through the HCV program that live in a variety of different areas throughout the city of Council Bluffs. The city of Council Bluffs does not see any segregated areas or R/ECAPs.

BELLEVUE

HUD Map 5 displays publicly supported housing in Bellevue including public housing, project based section 8, low income housing tax credit Overall, publicly supported developments are throughout Bellevue. There are several Low Income Housing Tax Credit and Project-Based Section 8 locations with one Other Multifamily project. Housing Choice Voucher units are limited throughout the community with no more than 11.35% voucher units in any census tract.

There are no R/EACPs in Bellevue as defined by HUD's AFFH tool.

Figure V -113 Publicly Supported Housing Bellevue



Source: HUD Map 5 Publicly Supported Housing and Race/Ethnicity

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

OMAHA

OHA

Only a handful of Omaha's public housing developments are located within the R/ECAP areas, but these tend to be large developments, and these developments contribute to the concentration of poverty in neighborhoods that are racially/ethnically segregated. These public housing developments located within the R/ECAPs represent roughly 30% of the public housing units in the region.

OHA has three large public housing developments with larger bedroom-size units for families with children: Southside Terrace, Spencer Homes, and Chambers Court. All three are located within R/ECAP areas.

In addition, the R/ECAP areas include two large public housing developments, Jackson Tower and Evans Tower. These two developments are primarily comprised of efficiency and one-bedroom apartments. Evans Tower is designated for elderly residents. Jackson Tower is open to any income-eligible household of appropriate size for its small apartments.

OHA has 4 developments designated for elderly residents. Evans Tower is located in a R/ECAP area in north Omaha. The other three elderly developments—Kay Jay, Underwood Tower, and Crown Tower—are located outside but near R/ECAP areas, in east Omaha neighborhoods with high concentrations of minorities and higher concentrations of poverty.

The majority of OHA's other public housing developments are located outside of R/ECAP neighborhoods, but like the majority of OHA's public housing units, they tend to be located in east Omaha, generally east of 72nd Street, in neighborhoods of minority concentration and higher concentrations of poverty.

OHA's public housing stock also includes more than 600 units which are considered to be scattered sites, many are single family homes or duplexes. With a few exceptions, these units are larger bedroom size and serve families with children. The majority were developed according to a settlement agreement that required that an equal number of scattered site public housing units be sited within each city council district. OHA's

scattered site public housing units located in north east Omaha are located in neighborhoods of high concentration of minorities and high concentrations of poverty—as are, though to a lesser degree, OHA’s scattered site public housing units sited in southeast and northwest Omaha. OHA also has 76 scattered site units located in southwest Omaha, which are sited outside of Omaha’s neighborhoods of high minority concentration and concentration of poverty. OHA also has roughly 45 units of public housing in the Timbercreek Apartments development, which is located in the southwest.

DCHA

DCHA properties offer preference points at many developments for disability and employment. There is a higher demographic of persons with disability in the developments. DCHA also offers a range of houses that provide subsidized housing to larger family structures that with family member that is disabled or employed 25 hours/week or more.

COUNCIL BLUFFS

Publicly Supported Housing is spread throughout the city of Council Bluffs. There are many different properties located throughout the city that provide subsidized housing, along with voucher holders through the HCV program that live in a variety of different areas throughout the city of Council Bluffs. The city of Council Bluffs does not see any segregated areas or R/ECAPs.

BELLEVUE

Bellevue does not contain a R/ECAPS area. The publicly support housing is spread out throughout our community. There is one project-based section 8 location for specifically for elderly located in Western Bellevue in the Olde Towne Bellevue area and another low income housing tax credit property specifically for persons with disabilities in west central Bellevue. The remaining units available to families with children are scattered throughout Bellevue.

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

OMAHA

OHA

Table V-66 Omaha Comparison of Demographics in R/ECAP Census Tracts and Non-R/ECAP Census Tracts

		WHITE	BLACK	HISPANIC	ASIAN/PI	TOTAL
PUBLIC HOUSING	R/ECAPs	18%	72%	8%	0.12%	815
	NON-R/ECAPs IN JURISDICTION	27%	66%	5%	0.49%	1857
	JURISDICTION TOTAL	24%	68%	6%	0.38%	2,626
	OUTSIDE JURISDICTION (NON-R/ECAPs)	92%	5%	2%	0.31%	325
	REGION TOTAL	31%	61%	6%	0.37%	2,951
PROJECT-BASED SECTION 8	R/ECAPs	57%	35%	6%	0.27%	363
	NON-R/ECAPs IN JURISDICTION	68%	22%	9%	0.35%	566
	JURISDICTION TOTAL	64%	27%	8%	0.32%	938
	OUTSIDE JURISDICTION (NON-R/ECAPs)	81%	10%	6%	0.97%	725
	REGION TOTAL	71%	20%	7%	0.60%	1,663
OTHER MULTI-FAMILY	R/ECAPs	30%	65%	3%	0.00%	38
	NON-R/ECAPs IN JURISDICTION	81%	15%	3%	0.00%	150
	JURISDICTION TOTAL	71%	25%	3%	0.00%	188
	OUTSIDE JURISDICTION (NON-R/ECAPs)	92%	6%	0%	0.00%	62
	REGION TOTAL	76%	20%	2%	0.00%	250
HOUSING CHOICE VOUCHER	R/ECAPs	8%	89%	1%	0.26%	768
	NON-R/ECAPs IN JURISDICTION	27%	69%	3%	0.26%	3,724

JURISDICTION TOTAL	24%	73%	3%	0.26%	4,636
OUTSIDE JURISDICTION (NON-R/ECAPs)	76%	20%	3%	0.63%	1,893
REGION TOTAL	39%	57%	3%	0.37%	6,529

Source: HUD Tables 6 -7 Publicly Supported Housing by Program and R/ECAP Demographics

Roughly 30% of the jurisdiction’s public housing assisted households reside within R/ECAP areas. The public housing program predominantly serves Black households, in the R/ECAP areas and outside of R/ECAP areas, both in the jurisdiction and in the region as a whole. However the regional demographics largely reflect the jurisdiction’s demographics, as nearly 90% of the region’s public housing households reside within the jurisdiction. The percentage of Black households is higher in R/ECAPs than outside of the R/ECAPs. The percentage of White households is significantly higher (50% higher) outside of the R/ECAPs within the jurisdiction. Outside of the jurisdiction of Omaha, the region’s public housing units predominantly serve White households. There are only roughly 300 public housing units located outside the jurisdiction, and 92% of the households assisted are White. Hispanic households who receive public housing assistance are more likely to reside in a R/ECAP area. This is primarily due to the large concentration of Hispanic households in OHA’s Southside Terrace development, a large family development located in southeast Omaha, in a R/ECAP neighborhood.

Roughly 1,700 households in the region are assisted with project-based Section 8 programs. The Project Based Voucher (PBV) program has different demographics than other publicly supported housing programs in the jurisdiction and in the region, namely the PBV program serves a larger percentage of White households. White households represent 64% of all PBV-assisted households in the jurisdiction, and 71% of all PBV-assisted households in the region. Roughly 22% of the region’s PBV households reside in R/ECAP areas. These households include a higher percentage of Black families (35% in R/ECAPs, compared to 22% of households who reside in non-R/ECAP areas within the jurisdiction, and 10% of households who reside in non-R/ECAP areas outside of the jurisdiction). Roughly 44% of the region’s PBV-assisted households reside outside of the jurisdiction, and 81% of these households are White.

The region is home to roughly 250 households who are assisted by other multi-family programs. Only 15% of these households reside in R/ECAP areas, and the majority of these households (65%) are Black households. Roughly 85% of other multi-family program units are located outside of the R/ECAP neighborhoods. These programs predominantly serve White households. White households represent 81% of assisted households who reside in the jurisdiction and in neighborhoods outside of the R/ECAP

areas. White households represent 92% of households who reside in other multi-family programs located outside of the jurisdiction.

The HCV program, like the public housing program, predominantly serves Black households. Within the jurisdiction, roughly 17% of HCV-assisted households reside in R/ECAP areas. The percentage of Black households served in R/ECAP areas is significantly higher than HCV assisted households who reside outside of R/ECAP areas (89% compared to 69%). There is a significantly higher percentage of White households (27%) among PBV households who reside outside the R/ECAP areas. Only 8% of assisted households in R/ECAP areas are White households. The demographic makeup of HCV-assisted households who reside outside the jurisdiction of Omaha are very different: 76% of the approximately 1,900 households are White households.

DCHA

DCHA does not serve the R/ECAP area. On average our households show a higher income, more employed demographic.

COUNCIL BLUFFS

Council Bluffs does not contain any R/ECAPS as defined by HUD's AFFH tool.

BELLEVUE

Bellevue does not contain any R/ECAPS as defined by HUD's AFFH tool.

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

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

OMAHA

OHA

Hispanic households are under-served by OHA's public housing programs and other publicly supported housing in the jurisdiction. However developments located in south and southwest Omaha, tend to have higher percentages of Hispanic residents. This includes Southside Terrace, a large development (359 units) with larger-bedroom size apartments for families with children. It also includes two small "scattered site" family developments, Crown II and Crown II, which are located just south of Southside Terrace. A pair of public housing Towers that are located in southeast Omaha—Kay Jay Tower and Highland Tower—also have higher percentage of Hispanic households (18% and 11%, respectively). Even in scattered site public housing, Hispanic families are more likely to reside in units located in the southeast and southwest. This includes Timber Creek (16% Hispanic), Scattered Sites Southwest (13%) and Scattered Sites Southeast (8%).

OHA's public housing developments located in north Omaha, particularly northeast Omaha—in Omaha's historically Black neighborhoods—have notably higher percentages of Black households. Spencer Homes is a large development (112 units) with larger bedroom sizes to serve families with children. Located in one of Omaha's north R/ECAP areas, Spencer Homes' households are 80% Black. Chambers Court, with 70 family units located in the same neighborhood, has 90% Black households. Scattered site units in the north also predominantly serve Black families.

OHA's towers, primarily composed of small bedroom size units, tend to have a more mixed demographic composition. For example, Pine Tower has 35% White households, 59% Black households, and 4% Hispanic households. However, public housing towers located in north Omaha, have much higher percentages of Black households. For example, Florence Tower, which has 88% Black households, 9% White households, and 2% Hispanic households.

The HCV program follows the same pattern as OHA's public housing program. Of the roughly 4,600 households in the jurisdiction who are assisted through the HCV program, 73% are black households. The largest concentrations of vouchers are located in northeast and northwest Omaha.

DCHA

DCHA properties offer preference points at many developments for disability and employment. Therefore there is a higher demographic of persons with disability in the developments. DCHA also offers a range of houses that provide subsidized housing to larger family structures with a family member that is disabled or employed 25 hours/week or more.

Project-based Section 8 and other Multifamily housing appears to be further away from the R/ECAP area, more than standard public housing and LIHTC developments

COUNCIL BLUFFS

Council Bluffs has eight Project-Based Section 8 complexes that are primarily occupied by White, Non-Hispanic households. The exception is the Plains View Apartments which has a Hispanic occupancy of 43%.

Table V-67 Public Housing, Project-Based Section 8, and Other Multifamily Assisted Housing

Public Housing								
Council Bluffs Jurisdiction								
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
Regal Towers	IA023	MHA	209	95%	2%	3%	N/a	N/a
Dudley Court	IA023	MHA	85	95%	2%	1%	N/a	N/a
Project-Based Section 8								
Council Bluffs Jurisdiction								
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
Woodbury Pines Apts.	N/a	N/a	100	89%	2%	5%	1%	82%
Featherstone Apartments	N/a	N/a	102	69%	21%	7%	N/a	80%
Bluffs Homes, Inc.	N/a	N/a	70	N/a	N/a	N/a	N/a	N/a
Camelot Village	N/a	N/a	35	100%	N/a	0%	N/a	N/a
Maple Park Apts.	N/a	N/a	51	94%	4%	0%	N/a	N/a
North Avenue Tower Apts.	N/a	N/a	92	93%	1%	0%	N/a	N/a
Northgate Apts.	N/a	N/a	45	81%	7%	2%	9%	68%
Plains View Apartments	N/a	N/a	30	54%	4%	43%	N/a	N/a
Other Multifamily Assisted Housing								
Council Bluffs Jurisdiction								
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
Kanesville Heights	N/a	N/a	37	100%	N/a	0%	N/a	N/a
Mosaic Housing Corp. Xv	N/a	N/a	12	100%	N/a	0%	N/a	N/a
<small>Note 1: For LIHTC properties, this information will be supplied by local knowledge. Note 2: Percentages may not add to 100 due to rounding error. Note 3: Data Source: APSH</small>								

Source: APSH

BELLEVUE

For Project-Based Section 8 units, the demographic composition for Bellewood Courts, Mission House Vue, and Bellevue Place developments are similar to the demographic make-up of the city as a whole. Southgate Apartments demographic make-up is significantly different than other developments with a higher population of Black households and possibly families with children.

Table V-68

Table 8 - Demographics of Publicly Supported Housing Developments, by Program Category								
Public Housing								
Bellevue, NE Jurisdiction								
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
Bellevue Housing Authority	NE174	Bellevue Housing Authority	49	57%	24%	14%	4%	94%
Project-Based Section 8								
Bellevue, NE Jurisdiction								
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
<u>Bellewood Courts/Bellewood South</u>	N/a	N/a	84	93%	1%	2%	4%	N/a
<u>Mission House Vue</u>	N/a	N/a	42	97%	N/a	3%	N/a	N/a
<u>Bellevue Place</u>	N/a	N/a	42	90%	5%	2%	N/a	N/a
<u>Southgate Apts</u>	N/a	N/a	145	47%	33%	16%	1%	78%
Other HUD Multifamily Assisted Housing								
Bellevue, NE Jurisdiction								
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
<u>Sheltering Tree Housing Corp</u>	N/a	N/a	11	N/a	N/a	N/a	N/a	N/a
<i>Note 1: For LIHTC properties, this information will be supplied by local knowledge.</i>								
<i>Note 2: Percentages may not add to 100 due to rounding error.</i>								
<i>Note 3: Data Sources: APSH</i>								

Source: HUD Table 8

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

OMAHA

OHA

Hispanic households are under-served by OHA's public housing programs and other publicly supported housing in the jurisdiction. However developments located in south and southwest Omaha tend to have higher percentages of Hispanic residents. This includes Southside Terrace, a large development (359 units) with larger-bedroom size apartments for families with children. It also includes two small "scattered site" family developments, Crown I and Crown II, which are located just south of Southside Terrace. A pair of public housing Towers that are located in southeast Omaha—Kay Jay Tower and Highland Tower—also have higher percentage of Hispanic households (18% and 11%, respectively). Even in scattered site public housing, Hispanic families are more likely to reside in units located in the southeast and southwest. This includes Timber Creek (16% Hispanic), Scattered Sites Southwest (13%) and Scattered Sites Southeast (8%).

OHA's public housing developments located in north Omaha, particularly northeast Omaha—in Omaha's historically Black neighborhoods—have notably higher percentages of Black households. Spencer Homes is a large development (112 units) with larger bedroom sizes to serve families with children. Located in one of Omaha's north R/ECAP areas, Spencer Homes' households are 80% Black. Chambers Court, with 70 family units located in the same neighborhood, has 90% Black households. Scattered site units in the north also predominantly serve Black families.

OHA's towers, primarily composed of small bedroom size units, tend to have a more mixed demographic composition. For example, Pine Tower has 35% White households, 59% Black households, and 4% Hispanic households. However, public housing towers located in north Omaha, have much higher percentages of Black households. For example, Florence Tower, which has 88% Black households, 9% White households, and 2% Hispanic households.

The HCV program follows the same pattern as OHA's public housing program. Of the roughly 4,600 households in the jurisdiction who are assisted through the HCV program, 73% are black households. The largest concentrations of vouchers are located in northeast and northwest Omaha.

DCHA

Since many of DCHA properties are located outside of the service area and in smaller communities, there is a correlation to the amount of racial and ethnic diversity. These communities are generally smaller, established towns primarily white. This is a trend that we feel is gradually changing over the years. We are directing out marketing toward a more diverse population. Schools and communities in those areas are making adaptations to the changing cultures.

COUNCIL BLUFFS

Throughout the city of Council Bluffs, there are 41,510 households, out of those households 91.06% consist of White residents, 1.12% consist of Black residents, 5.82% consist of Hispanic residents and 0.48% consist of Asian or Pacific Islanders. Although there are significantly less residents that fall into protected classes, there is something that is largely noticeable about the city of Council Bluffs; over half of the population of White residents fall within the extremely low to moderate-income category. Therefore, the city of Council Bluffs has a significant difference from other areas within its region; while the city of Omaha may see a larger number of families that fall into protected classes that fall into the extremely low to moderate-income category, which is not the case for the city of Council Bluffs.

The Municipal Housing Agency's Public Housing properties are Dudley Court and Regal Towers. The MHA's Public Housing properties mainly house elderly, disabled and near-elderly residents. The Municipal Housing Agency's first preference for the waiting list is elderly and disabled individuals that currently reside in the city limits of Council Bluffs.

The Municipal Housing Agency manages no additional public housing units except for Dudley Court and Regal Towers. The Municipal Housing Agency does administer 677 housing choice vouchers and in addition, Municipal Housing Agency's Housing Choice Voucher program has 20 VASH vouchers that are designated for homeless veteran applicants. The Municipal Housing Agency has strong ties with many different agencies

throughout the community that provide support to those that are disabled and in need of assistance.

BELLEVUE

Southgate Apartments is located in a census tract that is demographically different than the community as a whole. This area is made up of 39% White households, 25% Black households and 25% Hispanic households. Bellevue Place Apartments is specifically for elderly households. The multifamily assisted housing project, Sheltering Tree Housing, is specifically for adults with developmental disabilities to provide individual apartments with a live-in manager caregiver.

c. Disparities in Access to Opportunity

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

OMAHA

OHA

Publicly supported housing is heavily concentrated in the eastern portion of the City of Omaha. This is also the area that has lower performing schools.

Many of the large employers in the City of Omaha are located centrally in either the downtown area, Midtown or along the Dodge Street corridor. There are far fewer employment opportunities in northeast Omaha when compared with the rest of the jurisdiction. The northeast section of Omaha also has the largest concentration of publicly supported housing.

Public transit access is generally poor throughout the jurisdiction but is slightly better in east Omaha when compared with west Omaha.

Because of the concentration of publicly supported housing in the eastern portion of the City, the protected classes have limited access to low poverty neighborhoods, which are

concentrated in the western portion of the City.

The environmentally impacted neighborhoods in the jurisdiction are primarily located in the eastern part of the City. These neighborhoods were impacted by the lead smelting plant that was located along the Missouri River. The heavily impacted areas are located specifically in the northeast portion of the City.

DCHA

The access to opportunity is primarily caused by lack of transportation options to many residents of publicly supported housing at various levels. There are a limited number of employment, housing, and educational opportunities throughout the area, opportunities to utilize these are dependent on the abilities of the person to get to them, something that having a family, disability or lower income can limit. Very few publicly supported housing options are in areas with greater access to opportunity and those that are often have long waiting lists. There are no public transportation areas near many of the larger employment hubs. Also, the level of skill and entry level positions may not be available at these locations.

COUNCIL BLUFFS

While the city of Council Bluffs has many different options for low-income or subsidized housing, there are still many individuals that are living in subpar housing that is not adequate. There are many participants in the HCV program that have different barriers when they attempt to find suitable housing, either the landlord will not accept a Voucher, the rent and utilities do not meet the payment standards, or the unit does not pass HQS standards. The Municipal Housing Agency is the only agency in Council Bluffs that has Public Housing. There is a need for larger units that are subsidized, as the Municipal Housing Agency only has units that are efficiencies and one-bedroom.

BELLEVUE

HUD Map 5 shows that there are publicly supported housing developments throughout Bellevue. While the location of project-based Section 8 Housing, LIHTC and Public Housing units are spread out through the community, HCV participants have limited choice within Bellevue when compared to the region as a whole

2. Additional Information

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

OMAHA

OHA

The Omaha Housing Authority, as part of the settlement of a lawsuit, was required to acquire 521 scattered site units that are evenly distributed among the Omaha City Council districts. With the exception of these units, Omaha Housing Authority units are located in east Omaha, generally east of 50th Street.

DCHA

The general public often is more in support of senior housing options. There is a wider selection of LIHTC options for elderly designation throughout all areas. Communities and areas seem more concerned and oppositional to housing primarily serving families with children in many areas.

COUNCIL BLUFFS

Through feedback the City of Council Bluffs and the Municipal Housing Agency heard concerns that there is a lack of housing stock in affordable units in a variety of sizes, as well as that there is not enough affordable accessible housing in Council Bluffs. It was expressed by participants of the Housing Choice Voucher program that there is a definite issue with impediments to mobility. One Voucher holder expressed that she would like to move due to her son's need to be in a certain school district, due to his disability, but could not find a landlord that would take her voucher or a home that fell within the payment standard guidelines.

BELLEVUE

Table V-69 Bellevue Housing Authority Waiting List Demographics

Bellevue Housing Authority Waiting List								
Bellevue, NE Jurisdiction								
Development Name	PHA Code	PHA Name	# Households	White	Black	Hispanic	Asian	Households with Children
HCV Waiting List – Current Bellevue Residents	NE174	Bellevue	267	143(54%)	71(26%)	22(8%)	2(.1%)	201
HCV Waiting List – Not Current Bellevue Residents	NE174	Bellevue	1155	222	622	52	6	725

Source: Bellevue Housing Authority, Waiting List 2017

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

OMAHA

OHA

OHA's public housing stock represents a significant share (roughly 3,000 units) of the region's publicly supported housing. With the exception of scattered site units, the majority of OHA's public housing developments are located in east Omaha, in the jurisdiction's neighborhoods identified as R/ECAPs or having high concentrations of minority households and high concentrations of poverty. Obviously, these site-based units cannot be relocated. Instead, OHA's intent is to seek to strengthen neighborhoods in which its public housing stock is located. This may include redevelopment or renovations of OHA's large multifamily housing developments. It also includes cooperation with community stakeholders for improvements and redevelopment in the neighborhoods surrounding OHA's public housing. From this perspective, the location of new affordable housing within R/ECAPs and areas of concentrated poverty may have significant benefits, for purposes of redeveloping blighted properties and increasing public and private investment in neighborhoods.

In the 1990s-2000s, OHA entered into a settlement agreement to develop 521 scattered site units located throughout the city of Omaha. Private discrimination was a significant barrier to these acquisitions, particularly in neighborhoods with limited affordable

housing and lower concentrations of poverty.

Poverty is a significant barrier to many families' housing choice and access to opportunity. OHA operates Family Self-Sufficiency programs serving both its public housing and Section 8 program participants. While the service resources are not sufficient to address the need in our community, these programs make a significant impact on the lives of the families assisted.

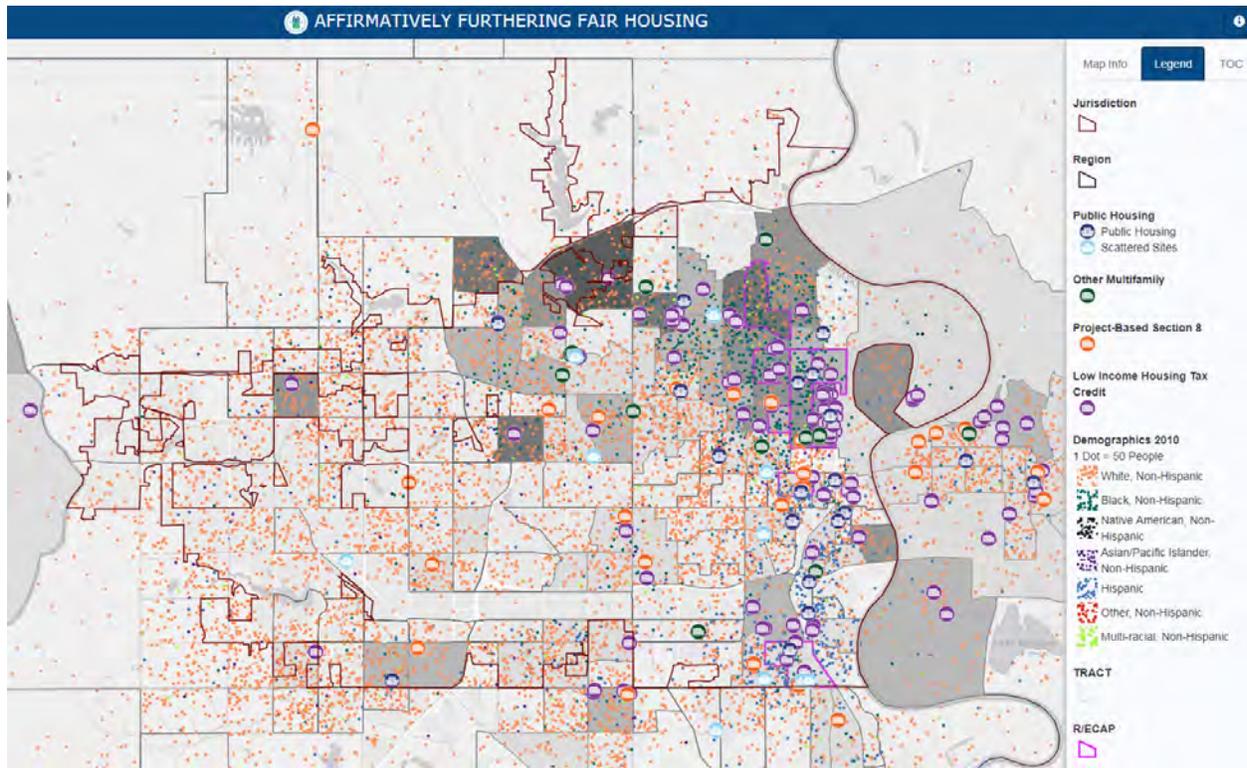
The demographics of OHA's public housing developments tend to reflect the demographics of their surrounding neighborhoods. There is a large concentration of Hispanic families in south Omaha. OHA's public housing developments likewise contain a large number of Hispanic families. In north Omaha, Omaha's historically Black neighborhoods, OHA's public housing developments have high concentrations of Black families. OHA maintains site-based waiting lists, so that families can choose their priorities developments for admission. To a large extent, the households served request to live in the same neighborhoods with high minority concentrations. There are a number of very practical reasons for this—their family may live nearby, their child care providers, their support networks, the restaurants and churches and cultural resources they prefer. In many cases when OHA offers to transfer a family, Hispanic families may refuse to move outside of south Omaha, and likewise Black families may refuse to move outside of north Omaha. OHA's commitment is to support family choice, and to expand access to opportunity for all families served.

DCHA

DCHA has had much success with a limited number of self-sufficiency tenants, and resident services offered to elderly and disabled complexes. It appears that often tenant's may be in a generational cycle of poverty and subsidized housing. The opportunity to have additional guidance and support in this environment has proven in the programs to have success.

Overall, there is an ongoing need for additional need for more publicly supported housing in DCHA jurisdictional area. HUD map 17 clearly shows a significant lack of affordable units in the western area of DCHA jurisdiction.

Figure V -114 Publicly Supported Housing Omaha



Source: HUD Map 17

There are some pockets of more affordable options noted but in the vast majority of the area, this is not the case. One of the biggest barriers is income discrimination. Despite there being a vast amount of apartment complexes and rental units in the area, often there is much resistance and willingness to accept HCV. Some of this also comes from community opposition as well. Historically there has been public resistance in some areas when housing plans are released to the general public. Often it is reported, property owners experience NIMBYism. This significantly impacts the willingness of developers to build outside the core neighborhoods. Occupancy codes are an issue in the service area. Since the FMR is at a higher level, families often cannot afford or locate the appropriate size unit for their family size. Fair Market rents have increased significantly in up and coming areas of the city. This has caused an increased demand of rental housing in various areas of the jurisdiction. In addition, the HCV programs continue to face additional budgetary reductions.

COUNCIL BLUFFS

The Municipal Housing Agency has received grant money from the Council Bluffs Housing Trust Fund to complete various renovations to the Regal Towers and Dudley Court properties. These grant monies were used to renovate existing units and make them more accessible, through walk-in and roll-in shower renovations, providing high-rise toilets in units, and other accessible accommodations as well. The Municipal Housing Agency will continue to apply for grant monies from the Council Bluffs Housing Trust Fund to renovate units to make them more accessible, to combat the issue that the region faces with a lack of accessible units in a range of sizes. The Family Self-Sufficiency Program strives to obtain new participants, so they may one day maintain self-sufficiency without the help of the Housing Choice Voucher program. Within the past 12 months, Municipal Housing Agency's Family Self Sufficiency Program has had four out of six participants graduate. Amongst these participants, they received \$55,088.31 in escrow funds. One of those graduates went into homeownership and used the money from her escrow account as a large down payment on her home. Another graduate successfully left the Housing Choice Voucher Program because her household income exceeded the income guidelines after obtaining employment from a local competitive employer.

BELLEVUE

Bellevue Housing Authority (BHA) has had a great deal of success with a limited number of residents through participation in a family self-sufficiency program. The program provides personalized goals and case coordination for community resources and education programs.

BHA offers Rentwise curriculum to the Omaha metropolitan area residents.

BHA does annual and ongoing outreach to private landlords. A great deal of this outreach is framed around fair housing education.

3. Contributing Factors of Publicly Supported Housing Location and Occupancy

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, 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.

OMAHA

Lack of community revitalization strategies:

Community revitalization strategies are focused on certain areas of the jurisdiction. Omaha's redevelopment has proven to be very successful in revitalizing older neighborhoods with high concentrations of poverty—for example, Omaha's redevelopment of Midtown and surrounding neighborhoods—however there are insufficient resources to meet the needs within the community.

Lack of private investment in specific neighborhoods:

Companies and developers are reluctant to invest in certain impacted areas of the jurisdiction due to the prevalence of crime, urban blight, and perceptions that the schools are lower quality. Developing green fields is less expensive than redeveloping and infilling in older neighborhoods. Public housing stock tends to be located in older Omaha neighborhoods with high concentrations of poverty.

Deteriorated and abandoned properties:

Deteriorated and abandoned properties in the older neighborhoods further discourage investment.

Source of Income discrimination:

Nebraska law does not prohibit landlords from refusing to lease to families with Housing Choice vouchers. Some states include "source of income" among the protected classes, and prohibit discrimination against vouchers. However, often landlords can get around legal prohibitions by increasing rents beyond the payment standard. The effect is to further limit the supply of affordable housing.

Lack of access to opportunity due to high housing costs:

Housing choice voucher families tend to concentrate in Omaha's neighborhoods with existing concentrations of minorities and concentrations of poverty. Many families prefer to live in Omaha's older neighborhoods. However, there are significant barriers for

families who chose (or would consider) to relocate to areas with lower concentration of poverty, namely west and southwest Omaha and surrounding communities.

Impediments to mobility:

There is limited availability of publicly supported housing in southwest Omaha, west of 72nd Street. Rental units in the southwest and west tend to be more expensive than units in the east. South and west Omaha are areas of job growth. Low income families residing in east Omaha, particularly northeast Omaha, have significant commutes to work. Families who rely on buses for transportation may face commutes of an hour or more.

Lack of affordable in-home or community based services for persons with disabilities:

OHA's public housing program serves a large number of persons with behavioral health disabilities. There is a need for increased supportive services to help persons with behavioral health disabilities to maintain lease compliance and maintain their housing. OHA continues to build partnerships with community resources to assist our residents. However, funding restrictions—both for OHA and for community service providers—result in unmet needs.

Access to publicly supported housing for persons with disabilities and lack of affordable accessible housing in a range of sizes:

OHA likely has the largest supply of affordable accessible housing in the region. However, the demand is greater than supply, particularly for large bedroom sizes.

Quality of affordable housing information programs and lack of meaningful language access:

The analysis of publicly supported housing programs indicates that Hispanic households are under-served. OHA has Spanish speaking staff and has not found that language is a barrier for Hispanic families' access to our housing programs.

COUNCIL BLUFFS

Disproportionate Housing Needs

1. Impediments to mobility
2. Lack of local or regional cooperation

BELLEVUE

Quality of affordable housing information programs:

While there are housing assistance opportunities in the community, the issues appears to be coordination of efforts so that the information is readily available and residents are aware of options available. This limits fair housing choice and access to opportunities due to lack of knowledge of the programs available.

Community Opposition:

Many Housing Choice Voucher holders have a hard time finding appropriate housing that will lease to voucher holders. Despite education and outreach from the Housing Authority staff, this has continued with several large management companies in the jurisdiction.

Lack of meaningful language access for individuals with Limited English Proficiency:

The City of Bellevue currently has a Limited English Proficiency plan, but is unaware of other plans and additional resources available. All organizations, including the City and Bellevue Housing Authority, with plans could work together to ensure all gaps are being addressed and sharing resources for a positive outcome.

Land Use and Zoning Laws:

The City of Bellevue Planning Commission reviews all zoning ordinances and land development proposals for consistency with the city comprehensive plan and has the opportunity to make recommendations to the City Council regarding requested changes to these ordinances. This can create situations in which municipalities have institutional barriers to affordable housing, such as minimum lot sizes and setbacks, that limit density. With available land becoming limited and Bellevue becoming landlocked by surrounding communities and natural barriers, future development of affordable housing will become more challenging with the political environment supporting more economic development.

Siting selection policies, practices, and decisions for publicly supported housing, including discretionary aspects of QAPs and other programs:

Overall, Bellevue lacks available public housing. HUD Table 6 states that Bellevue has a total household of 19,216 households in the jurisdiction with 2,445 households, or 12.7%, with of income 50% below the area median income. There are only 454 publicly supported housing units in Bellevue, which is substantial lower than the households that would qualify for assistance. The property tax structure in Sarpy County increases cost for affordable housing development. QAPs from NIFA have not taken this into

consideration when awarding credits.

Availability of affordable units in a range of sizes:

Overall, Bellevue lacks available public housing. HUD Table 6 states that Bellevue has a total household of 19,216 households in the jurisdiction with 2,445 households, or 12.7%, with of income 50% below the area median income. There are only 509 publicly supported housing units in Bellevue, which is substantial lower than the households that would qualify for assistance. The placement of larger families is difficult due to limited available units with four bedrooms or more.

Source of Income discrimination:

Many Housing Choice Voucher holders have a hard time finding appropriate housing that will lease to Voucher Holders. Despite education and outreach from the Housing Authority staff, this continues with several large management companies in the jurisdiction. BHA's Administrative and Occupancy Plans provide preferences to disabled and elderly households.

D. Disability and Access Analysis

1. Population Profile

Figure V-70 Disability by Type: Comparison of Region versus Jurisdictions

Disability type by percentage of the total population.				
	Region	Omaha	Council Bluffs	Bellevue
Hearing Difficulty	3.44%	3.28%	4.82%	3.24%
Vision Difficulty	1.83%	2.16%	2.46%	1.56%
Cognitive Difficulty	4.06%	4.72%	5.84%	3.51%
Ambulatory Difficulty	5.37%	5.87%	7.87%	5.35%
Self-care Difficulty	1.88%	2.14%	2.28%	1.77%
Independent Living Difficulty	3.50%	3.99%	5.02%	3.07%

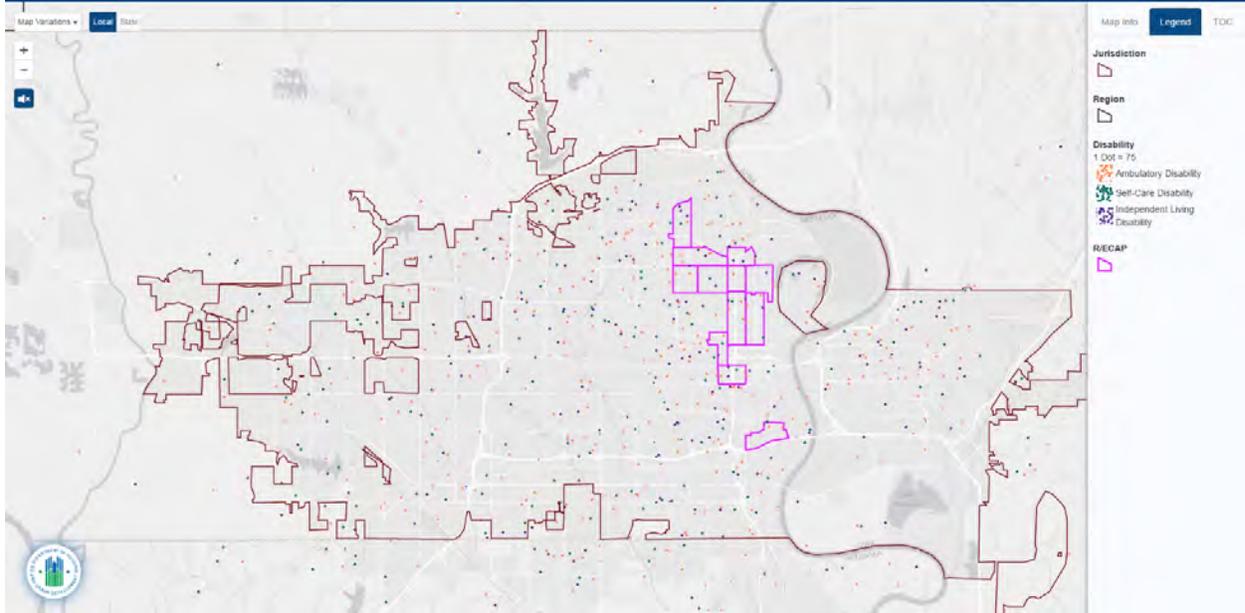
Source: HUD Table 13 Disability by Type

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

OMAHA

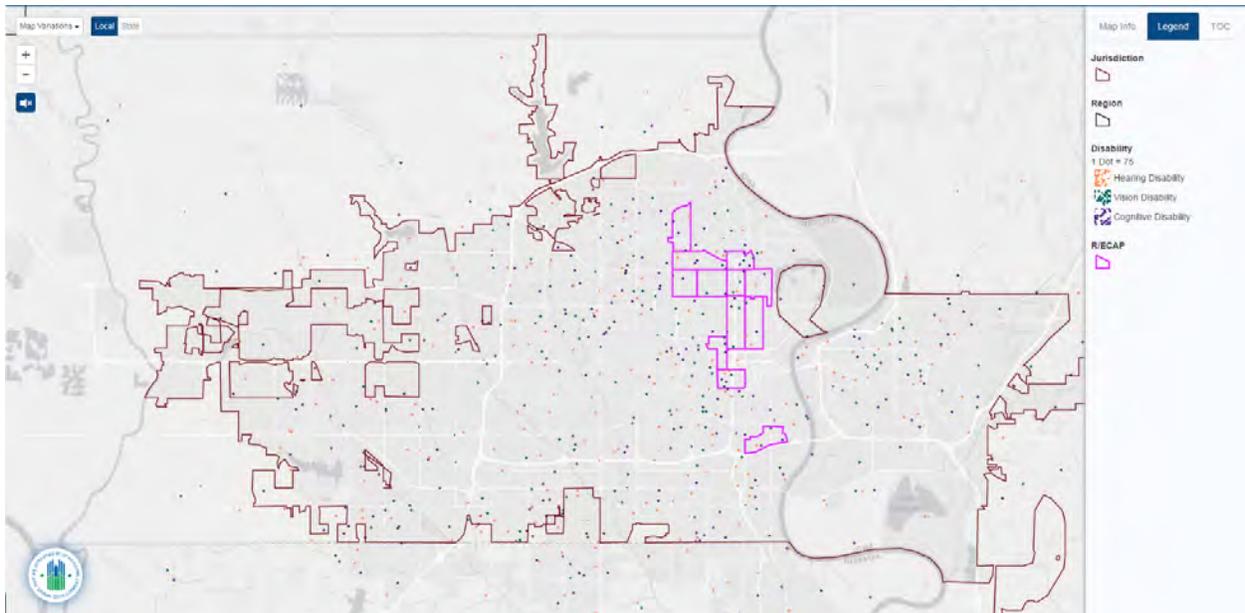
Persons with disabilities in all categories are not more highly concentrated in R/ECAP areas than in non- R/ECAP areas. However, persons with disabilities are more densely populated in areas east of 72nd street rather than the more affluent neighborhoods west of 72nd street in the Omaha metropolitan area.

Figure V -115 Dispersion of Auditory , Self-Care, and Independent Living in Omaha



Source: HUD Map 14 Disability by Type

Figure V -116 Dispersion of Hearing, V ision, and Cognitive Disability Living in Omaha



Source: HUD Map 14 Disability by Type

COUNCIL BLUFFS

According to Table V-71, the number one disability in Council Bluffs is ambulatory difficulty (7.87%). This is also the number one disability for the region with 5.37% of the population struggling with mobility.

Figure V-71 Disability by Type Council Bluffs

Disability Type	Council Bluffs Jurisdiction		Omaha-Council Bluffs Region	
	#	%	#	%
Hearing difficulty	2,740	4.82%	27,478	3.44%
Vision difficulty	1,400	2.46%	14,601	1.83%
Cognitive difficulty	3,318	5.84%	32,394	4.06%
Ambulatory difficulty	4,472	7.87%	42,837	5.37%
Self-care difficulty	1,297	2.28%	15,027	1.88%
Independent living difficulty	2,851	5.02%	27,896	3.50%

Note 1: All % represent a share of the total population within the jurisdiction or region.

Source: HUD Table 13, ACS

The disabled population does not have a concentration within a specific area in Council Bluffs. There are several retirement communities and senior projects within the City as well as two public housing facilities as outlined previously.

BELLEVUE

A total of 8,749 persons living in Bellevue have a type of disability. The majority are faced with an ambulatory difficulty (5.35%) as illustrated in the table below. The rates in Bellevue by disability type are similar to those in the Omaha-Council Bluffs region.

Table V-72 Bellevue Disability by Type

Bellevue Disability by Type				
	Bellevue, NE Jurisdiction		Omaha – Council Bluffs Region	
Disability type	#	%	#	%
Hearing difficulty	1,532	3.24%	27,478	3.44%
Vision difficulty	736	1.56%	14,601	1.83%
Cognitive difficulty	1,659	3.51%	32,394	4.06%
Ambulatory difficulty	2,531	5.35%	42,837	5.37%
Self-care difficulty	839	1.77%	15,027	1.88%
Independent living difficulty	1,452	3.07%	27,896	3.50%
TOTAL	8,749		160,233	

Source: HUD Table 13, ACS

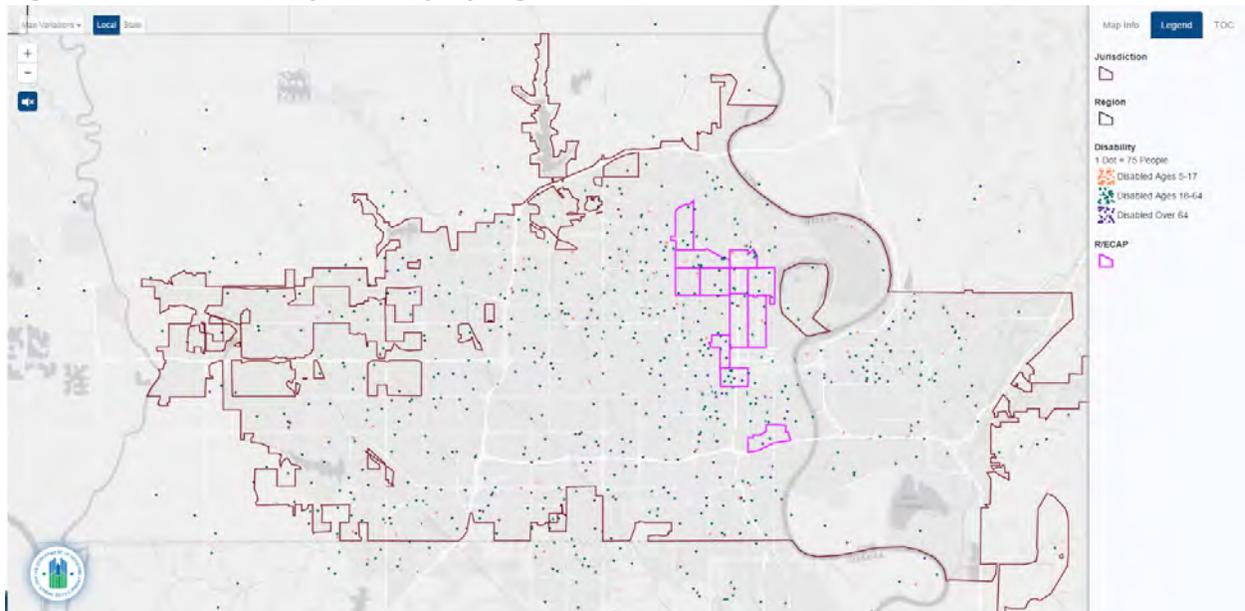
In Bellevue, persons with disabilities are dispersed throughout the community which is comparable with the region as a whole. The HUD Map 14 shows that persons with disabilities distribution throughout the city limits.

There is a slight variation in the location of these protected classes. In both maps, persons with disabilities are more focused on the areas in southeast and northwest Bellevue. These areas are also association with the older areas of the community with lower income levels and more affordable units.

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

OMAHA

Figure V -117 Disability Density by Age Omaha Council Bluffs Consortium



Source: HUD Map 15 Disability by Age Group

There does not appear to be a trend or pattern in the location regarding the age of persons with disabilities across the Omaha area.

COUNCIL BLUFFS

Facilities that accommodate disabled residents are located throughout the City.

BELLEVUE

The geographic location of individuals with a disability is similar when considering age and type of disability Citywide, the age group of 18 – 64 has the highest proportion of individuals with disabilities with 5.85%. This is similar to the Omaha-Council Bluffs metro area as a whole where the age group of 18 - 64 makes up 6.09% of the population. As with type of disability, the age groups are living more in the southeast and north central areas of Bellevue. There are no significant concentrations of

individuals with self-care and independent living disabilities.

Table V-73 Bellevue Disability by Age

Bellevue Disability by Age Group				
	Bellevue, NE Jurisdiction		Omaha – Council Bluffs Region	
Age of People with Disabilities	#	%	#	%
Ages 5-17 with Disabilities	388	0.82%	7,811	0.98%
Ages 18-64 with Disabilities	2,768	5.85%	48,546	6.09%
Ages 65+ with Disabilities	1,873	3.96%	31,797	3.99%
TOTAL	5,029		88,154	

Source: HUD Table 14, ACS

2. Housing Accessibility

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

OMAHA

The Fair Housing Act requires that most multifamily properties built after 1991 meet federal accessibility standards. As a result, multifamily housing built after this date, if built in compliance with federal law would meet this minimum level of accessibility, while buildings built before this date generally would not be accessible. The age of housing stock can be a useful measure in answering this question. In addition, affordable housing subject to Section 504 of the Rehabilitation Act must include a percentage of units accessible for individuals with mobility impairments and units accessible for individuals with hearing or vision impairments

There is no specific comprehensive data set for the Omaha, NE area that identifies the location of affordable accessible housing units. There is also no comprehensive data on whether or not rents below \$500 per month are accessible to the disability community.

COUNCIL BLUFFS

Despite long-term efforts to increase affordable, accessible housing in a range of unit sizes, this continues to be an obstacle for Council Bluffs. As stated previously, only 14% of units in the City have 4 or more bedrooms and only 2.4% have 5 or more bedrooms (American Fact Finder 2015 Update). This number decreases again when discussing accessible units.

BELLEVUE

HUD is unable to provide data at this time as there is limited nationally available disability related data. Specific data on privately-owned affordable, accessible housing is unavailable.

As discussed previously, the City has limited affordable housing stock available through public housing, Section 8 housing and HCV. Most single-family housing in general is not accessible to persons with disabilities specifically if the home was built prior to 1991 and

the Fair Housing Act. The majority of Bellevue housing or 79 percent was built prior to 1990. Additionally, city staff during the development of the AFH stated that the state's building codes have only recently caught up to the federal accessibility standard.

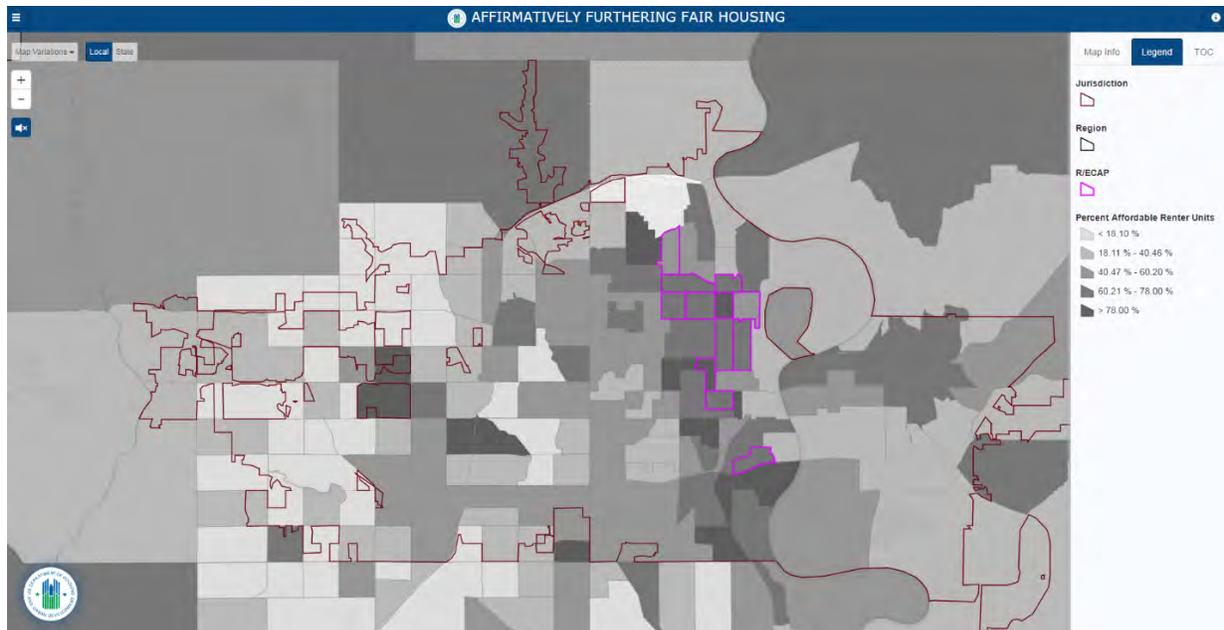
Although specific accessible housing data is unavailable, it is reasonable to conclude that these findings indicate that neither the City nor region has an adequate supply of affordable, accessible housing in a range of unit sizes.

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

OMAHA

There are only two of the 12 R/ECAP regions that have more than 78 percent of affordable housing renter units making up the housing market.

Figure V -118 Percentage of Affordable Rental Units Omaha/Council Bluffs Consortium



Source: HUD Map 17

COUNCIL BLUFFS

Council Bluffs is fortunate that accessible units are throughout the City. Affordability tends to be concentrated in the 51501 zip code which coincides with the poorest Census Tracts as well as areas of minority concentration. This is due to an older housing stock in 51501 compared to many new construction neighborhoods in zip code 51503.

BELLEVUE

HUD is unable to provide data at this time; single-family housing is generally not accessible to persons with disabilities unless state or local law requires it to be accessible or the housing is part of a HUD-funded program or other program providing for accessibility features. The Fair Housing Act requires that most multifamily properties built after 1991 meet federal accessibility standards.

Bellevue has a total of 21,745 housing units with only 4,515 that were built since 1990 which leaves 79 percent of the housing units built prior to 1991 and fair housing requirements.

The location of limited publicly supported housing is dispersed throughout Bellevue, and does not appear to align with segregated areas.

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

OMAHA

Over 30 percent of persons with disabilities in the Omaha jurisdiction and the Omaha-Council Bluffs jurisdiction live in public housing as well as over 20 percent in both areas living in Project-Based Section 8 Housing. Just over 20 percent of persons with disabilities in the two areas are part of the Housing Choice Voucher program. That means that almost 74 percent of the persons with disabilities received housing assistance.

Table V-74 Omaha Consortia Disability and Publicly Supported Housing

(Cnsrt-Omaha, NE CONSORTIA) Jurisdiction	People with a Disability	
	#	%
Public Housing	915	30.88%
Project-Based Section 8	327	23.11%
Other Multifamily	82	24.19%
HCV Program	1,187	20.79%
(Omaha-Council Bluffs, NE-IA) Region		
Public Housing	1,831	30.66%
Project-Based Section 8	685	21.85%
Other Multifamily	164	23.84%
HCV Program	1,395	20.86%
<p>Note 1: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.</p> <p>Note 2: Data Sources: ACS</p>		

Source: HUD Table 15

COUNCIL BLUFFS

Council Bluffs has two publicly supported housing complexes. Each are handicap accessible and adaptable as needed; however, neither support households with needs above two-bedroom. In these cases, vouchers must be used to provide housing assistance. Currently, half of public housing units are utilized by individuals with a disability.

Table V-75 Council Bluffs Disability and Publicly Supported Housing

Council Bluffs Disability by Publicly Supported Housing Program Category		
Council Bluffs Jurisdiction	People with a Disability	
	#	%
Public Housing	144	50.00%
Project-Based Section 8	65	14.22%
Other Multifamily	11	24.44%
HCV Program	175	28.93%
Omaha-Council Bluffs Region		
Public Housing	916	30.45%
Project-Based Section 8	358	20.81%
Other Multifamily	82	23.50%
HCV Program	1,395	20.86%
Note 1: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.		
Note 2: Data Sources: ACS		

Source: HUD Table 15

BELLEVUE

Table V-76 Bellevue Disability and Publicly Supported Housing

Bellevue Disability by Publicly Supported Housing Program Category				
	Bellevue, NE Jurisdiction		Omaha – Council Bluffs Region	
	#	%	#	%
Public Housing	1	2.22%	1,831	30.66%
Project-Based Section 8	31	10.16%	685	21.85%
Other Multifamily	N/a	N/a	164	23.84%
HCV Program	25	18.25%	1,395	20.86%
<p>Note 1: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs. Note 2: Data Sources: ACS</p>				

In Bellevue, 2 percent of public housing residents have a disability which is significantly lower than Project-Based Section 8 and HCV Program residents which are 10 percent and 18 percent respectively. These numbers are also considerably lower than regional percentages. This also shows Bellevue's limited public supported housing units available overall. Data is not available for type of disability or for other types of assisted housing.

These numbers indicate a need for affordable housing stock that is accessible. Public-supported housing units in Bellevue are fully-occupied with waiting list, which not only demonstrated need but also the long wait to essentially access these units.

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

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

OMAHA

As noted in Table 15 above, over 30% of the areas disability community resides in the North Omaha and South Omaha area where most of the public housing, Project Based Section 8, Other Multi-family and HCV Program housing is located.

COUNCIL BLUFFS

Council Bluffs has several organizations that provide living accommodations for persons with disabilities living in institutions or other settings including VODEC (Vocational Development Center), Crossroads of Western Iowa and Mosaic. These organizations partner with multi-family complexes to provide family-style living for clients with onsite caretakers. These units are throughout the City in a variety of complexes. Single-family units also exist throughout the city to house individuals with disabilities but on a more limited basis.

BELLEVUE

Overall, persons with disabilities in publicly supported housing live throughout the City. Those with hearing, vision, or cognitive disability are living in a more integrated setting than those with ambulatory, self-care and independent living disabilities which are found more in segregated settings due to housing options. Project-Based Section 8 are in eastern areas of Bellevue which are more aligned with those with ambulatory, self-care and independent living disabilities as shown in the maps below. Housing Choice Voucher holders are able to use vouchers throughout the community.

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

OMAHA

The Fair Housing Act, Section 504, and the ADA contain mandates related to integrated settings for persons with disabilities. Integrated settings are those that enable individuals with disabilities to live and interact with individuals without disabilities to the greatest extent possible and receive health care and supportive services from the provider of their choice.

There are very few options available for persons with disabilities to access affordable housing.

Good rehabilitation services improve function. Great rehabilitation services rebuild lives. QLI has become one of the nation's premier post-hospital centers for brain and spinal cord injury rehabilitation by embracing the concept that great rehabilitation is more than just the science of physical recovery – it is the art of rebuilding a life.

For more than two decades, QLI has set and raised the bar for working with individuals and families whose lives have been affected by brain injury or spinal cord injury. There are times in life when it is imperative that you seek out the best resources. QLI has a brand new, state of the art campus in Omaha.

Beyond the League of Human Dignity very few organizations provide support in modifying housing. Individuals with disabilities look for accessible housing just like any non-disabled individual by checking out various apartment complexes in the area. There is limited housing available under \$500 per month. If they are fortunate enough to find affordable housing, modifications/accommodations must be requested to their landlord.

COUNCIL BLUFFS

For single persons, the availability of accessible units is significantly higher than for families needing larger units. This is an area Council Bluffs realizes has shortfall.

BELLEVUE

Bellevue is faced with a lack of affordable housing to meet the needs of residents including those with disabilities who are faced with finding affordable and accessible units. The need for additional supportive housing in Bellevue has been identified, but is limited due to the location of many supportive services which are located in Douglas County and the lack of public transportation option to those services.

4. Disparities in Access to Opportunity

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

OMAHA

i. Government services and facilities

Local governments in the Omaha area have made substantial progress over the past decade in improving the availability of services for disabled persons, including the availability of information in alternate formats (for visually impaired), and interpreters and other support services to enable these residents to have access to information and services at public meetings or events.

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

Local government has reviewed infrastructure, including crosswalks, pedestrian lights, signage, parks and recreation facilities, city halls and other city facilities to improve accessibility for persons with disabilities. All facilities built since 1990 are accessible, and communities are making upgrades as funding allows to older buildings to address accessibility. The City of Omaha entered into a Department of Justice agreement in 2005 for a period of 10-years to address and become compliant with ADA Title II requirements. The City of Omaha completed that agreement in full in 2015. The agreement included updating old and enforcement of new sidewalks to be ADA-compliant. Sidewalks are inspected after installation for ADA compliance. The City works with the state department of transportation and developers when appropriate on the installation of pedestrian crossings and signals. Funding limitations are barriers to more comprehensively addressing needs in some areas. The City of Omaha encourages citizens to request reasonable accommodations and accessibility for public

events.

iii. Transportation

According to the Local Disability Data for Planners 2005-2007 report, 1.6 percent of the disabled population used mass transit to get to work in Douglas County where only 1.0 percent of the population without a disability used mass transit. Seven percent of the disabled population in Douglas County worked from home compared to 3.6 percent of the population without a disability, and 81.7 percent used a car, truck or van to get to work compared to 90.6 percent of the non-disabled population.

Forty four percent of the disabled population in Douglas Country spend 1-15 minutes getting to their place of work, 36.9 percent spend 16-30 minutes, 4.1 percent spend 31-60 minutes, and less than 2 percent spend more than an hour getting to work.

iv. Proficient schools and educational programs

According to the Local Disability Data for Planners 2005-2007 report, 32 percent of the disabled population had at least a high school degree in Douglas County compared to 21 percent of the population without a disability. Only 15 percent had a Bachelor's degree or higher compared to over 39 percent of the population without a disability.

v. Jobs

According to the 2010 Status Report released for Nebraska, 43.1 percent of the disabled population in the state were employed compared to 83.8 percent of the population without a disability. The Local Disability Data for Planner 2005-2007 report identified 45 percent of the disabled community employed in Douglas County. The largest percentage of those with a disability live below the poverty level in Douglas County with 21.3 percent living below 100 percent of the poverty level.

COUNCIL BLUFFS

i. Government services and facilities

The City and Pottawattamie County operate approximately 15 buildings with public access. Of these, all are accessible to persons with disabilities with the exception of the City's Community Development Department located in the Fire Department Headquarters Station Building. However, staff in this department are able to meet individuals unable to navigate the steps in the lower level of the building (Community Hall) that is accessible via an ADA ramp. An additional fire station is also not ADA compliant but renovations are underway to reconstruct the interior of the fire station to meet compliance.

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

All new sidewalks constructed are required to meet ADA requirements. The City continues to add pedestrian crossings and sidewalks to all projects to ensure access. As part of the Council Bluffs Code, all new construction projects require sidewalks and pedestrian crossings (where applicable) as part of the construction project.

iii. Transportation

The City collaborates with Metro Area Transit (MAT) for fixed routes and Southwest Iowa Transit Agency (SWITA) for paratransit, which is available to all Council Bluffs residents.

iv. Proficient schools and educational programs

Students with Individual Education Plans that call for specialized transportation based on a developmental or physical disability are able to get free transportation to the school that best fits his/her needs for educational development.

v. Jobs

Iowa residents with a disability are far less likely to be employed: Only 30 percent of working-age residents (16–64 years old) with a disability are employed compared to 66 percent of those with no disability and for those who are working, they earn less. The median annual earnings for an Iowa resident with a disability are \$18,647 compared to \$30,900 for a worker without a disability (American Community Survey, 2014). A total of

14 percent of adults in Iowa have a lasting physical, mental, or emotional disability that impedes them from being independent or able to work. Approximately 19 percent of Iowa residents aged 16 and over with a severe disability live in poverty, compared with 11 percent of the total population. Disability is generally disproportionately associated with age; in Iowa, 37 percent of residents 65 years or older are living with a disability, more than double the 14 percent average for all ages (American Community Survey, 2014). Additionally, while the overall unemployment rate for Iowa is 3.0%, it is 9.6% for persons with disabilities (Iowans with Disabilities: 2017, Attachment I). Council Bluffs Code Ord. 5973 § 1, 2008 outlines the requirements for businesses concerning discrimination of individuals with disabilities (Attachment H).

BELLEVUE

i. Government services and facilities

Services offered by the City of Bellevue are offered at three buildings and at various parks throughout the community. The City has an ADA Committee that reviews, identifies and works to correct ADA issues at each location. While funding is limited, the Committee works with each department to address issues within the annual budget.

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

With the age of Bellevue infrastructure, there are many areas and neighborhoods that lack sidewalks and curb ramps due to development prior to requirements being adopted. The City is working to install sidewalks and curb ramps in older areas in coordination with other public improvement projects. The City also works to address areas of concerns as they are brought to the attention of each department.

iii. Transportation

The City of Bellevue offers transportation service for those that are elderly and disabled during regular service hours. Those trips are limited by distance from the city limits.

Individuals with disabilities are more affected by the lack of transportation options offered within the community. The City's is provided with one public transportation route into Omaha that runs only during the week.

iv. Proficient schools and educational programs

The schools provide educational opportunities for children with disabilities. According to stakeholders, Bellevue Public School buildings are generally accessible to persons with disabilities; unfortunately the school bus stops are not always accessible.

v. Jobs

According to the American Community Survey 2011-2015 5-year survey, Bellevue has a total of 1,679 individuals with a disability in the workforce. Of those individuals, 89 percent are employed. Unfortunately, there are 1,400 individuals with a disability that are not in the labor force.

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

OMAHA

On each page of the City of Omaha's website and under the City of Omaha's Department of Human Rights and Relations website, the City's ADA Coordinator can be contacted to address barriers to City Programs, Services and Facilities and request accommodations and/or modifications. The City has an ADA Liaison Team to address ADA issues in a timely manner.

The Human Rights and Relations Department also addresses complaints of discrimination in Housing (Title VIII), Employment (Title VII), Public Accommodations and Title VI. The Department also enforces these laws through investigations, civil court, and settlement agreements.

METRO Transit also has an ADA Coordinator and addresses complaints from citizen transit riders and makes attempts to accommodate and/or modify issues related to Transportation Services, Programs and Facilities.

COUNCIL BLUFFS

According to the Iowa Code, an employer is obligated to accommodate an employee's disability under two prongs of the definition of disability: (1) actual and (2) record of impairment. There is no obligation to provide a reasonable accommodation for perceived disabilities. The employer must determine if the person has the requisite skill, education, experience and training as well as be able to perform the essential functions of the job with or without reasonable accommodation. If a qualified employee is unable to perform the essential job functions without a reasonable accommodation, the employee must request the reasonable accommodation and the employer must initiate an interactive process for determining what is reasonable. The interactive process has the following steps:

1. Analyze the particular job involved and determine its purpose and essential functions
2. Consult with the individual with a disability to ascertain the precise job-related limitations imposed by the individual's disability and how those limitations could be overcome with a reasonable accommodation
3. In consultation with the individual to be accommodated, identify potential accommodations and assess the effectiveness each would have in enabling the individual to perform the essential functions of the position
4. Consider the preference of the individual to be accommodated, select, and implement the accommodation that is most appropriate for both the employee and the employer. This may not be the employee's preference, but the solution that works best for both parties. Should the employee reject the proposed accommodation, he/she may be rendered unqualified for the position.

In order for the interactive process to work correctly, "both parties, not just the employer, have an obligation to participate in the interactive process. Should the employee fail to participate in good faith in the interactive process, he/she may be barred from asserting a failure-to-accommodate claim under the ADA (Attachment J)."

It is the policy and practice of the City of Bellevue to ensure exceptional public service by providing full access to programs, services, and activities for all members of the public, including persons with disabilities. The City continually strives to eliminate barriers that may prevent persons with disabilities from access to or participation in City programs, services, activities, and facilities. The City will make reasonable modifications in policies, practices, and procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless the City can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity.

Request for Reasonable Accommodations can be submitted to the City of Bellevue for consideration and more information is available on the City's website.

BELLEVUE

The City of Bellevue will not discriminate against individuals with disabilities based on a disability in its services, programs, or activities in accordance with the requirements of title II of the Americans with Disabilities Act of 1990.

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

OMAHA

The challenge is for disabled persons on limited incomes to secure homeownership. In particular, those receiving SSI from Social Security. This level of income (SSI) does not enable disabled persons to qualify for many homeownership programs.

COUNCIL BLUFFS

Difficulties for individuals achieving homeownership in Council Bluffs tend towards two main issues: (1) finding accessible homes within the City's affordable housing stock and (2) lack of income to qualify for a mortgage. Because of the age of the City's housing stock, many homes are not accessible to those with physical disabilities. Additionally, the median earnings for lowans at 16 and over with disabilities is \$19,607 compared to those without disabilities is \$30,964 (lowans with Disabilities 2017, Attachment K).

BELLEVUE

The greatest difficulty facing persons with disabilities in homeowners is located an accessible home. Cost to renovate an existing home to make it accessible can be cost prohibitive for many. Features such as no-step entries, bathrooms on the first floor, ect. Are not always common features among the available housing stock. With the area topography, many home are split level or have stairs along entryways.

5. Disproportionate Housing Needs

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

OMAHA

The challenge is for disabled persons on limited incomes to secure housing. There is an insufficient supply of such housing and rents in the area are typically above \$500. The typical SSI income does not enable disabled persons to secure adequate housing.

COUNCIL BLUFFS

The main housing need for disabled persons outlined is accessibility including entryways and interior doorways, bathrooms and kitchens. Because of the age of the housing stock in Council Bluffs, many homes unless previously converted do not meet the accessibility requirements of persons with disabilities.

BELLEVUE

Bellevue has limited public housing options which are even more limited when the unit needs to be fully accessible. It was noted that persons with disabilities are more likely to be low and moderate income and lack housing options due to accessibility.

6. Additional Information

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

OMAHA

Local Disability Data for Planners 2005-2007 Report retrieved at:

<https://www.infouse.com/disabilityplanningdata>

COUNCIL BLUFFS

The City partners with the League of Human Dignity each year to complete barrier removal projects for income qualified disabled residents who specifically need entrance and bathroom modifications to his/her residence. After the initial assessment and investment, the City has continues working with the property owner to further update his/her property in order to increase the safety of the property.

Also, the City has collaborated with the Vocational Development Center (VODEC) of Council Bluffs to improve group home housing for disabled clients. This includes exterior improvements (ramps), kitchen updates for safety and relocation of laundry facilities for disability access.

Lastly, the City has provided HOME Investment Partnership Program (HOME) funds to the following HUD Section 811 projects:

1. Mosaic: Reconstruction of a 10-unit apartment complex into a 14-unit rehabilitation complex for persons with disabilities and mental illness.
2. Indian Creek Apartments: Construction of a 12-unit complex comprised of one and two-bedroom units to serve persons with disabilities only.
3. Plain View Apartments: 30-unit complex for individuals who are wholly physically disabled and require wheelchair accessibility.

Council Bluffs Municipal Code outlines the requirements for accommodation for persons with disabilities (Attachment O).

BELLEVUE

The City of Bellevue is faced with pedestrian accessibility due to the age of the community and infrastructure. While the city is working towards becoming a Complete Streets community, the improvement of pedestrian infrastructure is delayed due to cost and overwhelming need across the area.

7. Disability and Access Issues Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, 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.

OMAHA

- Source of income discrimination
- Access to transportation
- Location of accessible housing
- Occupancy codes and restrictions
- Lack access to opportunity due to high housing costs
- Lack of affordable accessible housing in a range of units and sizes
- Lack of assistance for housing accessibility modifications
- Lack of affordable in-home or community-based services
- Access to publicly supported housing

COUNCIL BLUFFS

Disability and Access

- 1.Lack of assistance for transitioning from institutional settings to integrated housing
- 2.The availability of affordable units in a range of sizes
- 3.Impediments to mobility
- 4.Private Discrimination
- 5.Inaccessible government facilities or services
- 6.Source of income discrimination
- 7.Lack of local public fair housing enforcement

BELLEVUE

Access to publicly supported housing for persons with disabilities:

As stated previous, Bellevue lacks publicly supported housing units. This impacts persons with disabilities at a greater level when needing accessible units. According to HUD Table 7, 50 of the 455, or 11%, publicly supported housing units are occupied by disabled individuals.

According to the Bellevue Housing Authority, accessible units are difficult to fill for public housing, but Section 8 Voucher holders have a difficult time finding rental units that are accessible due to the age of the affordable housing. There is not one area affected more than another by the available of accessible publicly supported housing and no public housing has been lost.

Access to transportation for persons with disabilities:

As discussed above, issues with transportation also affect persons with disabilities, although individuals with disabilities may be disproportionately affected by limited transportation options as they tend to rely more on public transportation. While Bellevue does offer a Specialized Transportation Service specifically for disabled and elderly residents, it is limited by the hours of services and locations of service. By limiting the hours of service, access to opportunities are limited.

Inaccessible public or private infrastructure:

Due to the age of the community, many of Bellevue's existing infrastructure is deteriorating and some areas that were annexed after development lack necessary infrastructure.

Currently, many areas of infrastructure in Bellevue lack sidewalks, handicap accessible curb cuts, and APS signals due to the overall age of the community. As the City updates the infrastructure, accessibility is addressed. The increasing the timeliness of the improvements continues to face barriers such as limited resources. The City of Bellevue has an ADA Committee that reviews accessibility laws, regulations and guidance to ensure all issues or concerns within the community are addresses. Residents who experience barriers to accessibility can file an accommodation request for the City's review and consideration.

Lack of affordable in-home or community-based supportive services:

While Bellevue does offer some services to disabled, many services are not well known. Also, Bellevue and Sarpy County lack supportive services which then requires residents to travel to Omaha and Douglas County to access services. This may add additional cost onto individuals with disabilities that may already be living on a fixed income.

Faced with these issues that may present a barrier to fair housing choice, services that are offered in Bellevue need to be highlighted and those only in Douglas County needed to be reviewed to determine the feasibility of offering the program in Bellevue and Sarpy County.

Lack of affordable, accessible housing in range of unit sizes:

With much of the housing stock built prior to the 1991 Fair Housing Act, many housing units are not accessible and modification may be cost prohibitive. Bellevue has a total of 21,745 housing units with only 4,515 that were built since 1990, which leaves 79 percent of the housing units built prior to 1991.

While the City of Bellevue can influence future development with zoning and code requirements, the existing housing stock built prior to 1991 will have accessibility issues. Currently, offer CDBG assistance to elderly and disabled households to address accessibility issues in owner occupied housing units. No known assistance is offered for rental units.

Land use and zoning laws:

With land available for development becoming limited, the City needs to review current land use and zoning laws to ensure all housing options are encouraged and to have mechanisms to require fair housing development such as inclusionary zoning.

Zoning requires should also be reviewed to ensure occupancy requirements for the land use do not prohibit fair housing choice.

Lack of assistance for housing accessibility modification:

City of Bellevue can influence future development with zoning and code requirements, the existing housing stock built prior to 1991 will have accessibility issues. Currently, the CDBG program, offers assistance to elderly and disabled households to address accessibility issues in owner occupied housing units. No known assistance is offered for rental units.

Occupancy Codes and restrictions:

The City of Bellevue reviews and updates ordinances regularly throughout the year with text amendments as necessary. In 2011, there was a complete update of the ordinances by a consulting firms. With continual updates, any recommended changes to occupancy codes or fair housing ordinances need to be reviewed by those affected by the change to ensure there is not a violation or hindrance to fair housing.

Source of Income Discrimination:

Many Housing Choice Voucher holders have a hard time finding appropriate housing that will lease to Voucher Holders. Despite education and outreach from the Housing Authority staff, this continues with several large management companies in the jurisdiction.

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

1. List and summarize any of the following that have not been resolved:

- a charge or letter of finding from HUD concerning a violation of a civil rights-related law
- a cause determination from a substantially equivalent state or local fair housing agency concerning
- a violation of a state or local fair housing law
- a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law
- or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally , including an alleged failure to affirmatively further fair housing
- a pending administrative complaints or lawsuits against the locality alleging fair housing violations or discrimination

TESTING OVERVIEW

The Fair Housing Center of NE-IA (the Center), is a program of Family Housing Advisory Services, Inc. (FHAS) and serves all of Nebraska and Iowa. The Center was established (1994) as a full-service fair housing center under a HUD Fair Housing Initiatives Program (FHIP) grant for three years. The grant was applied for in order to expand the capacity of FHAS to address the problems experienced by its clients who were experiencing discrimination in their attempts to secure housing. Full-service fair housing centers include complaint intake and investigation of fair housing complaints, fair housing testing, education and outreach, and counseling and advocacy on behalf of persons who have experienced discrimination.

The Center operates the only HUD approved testing program in the two states. Testing is a process for gathering information on actual practices in the marketplace. Such information can then be used in measuring any differences in treatment, including the quality, content, and the quantity of information and service, given by real estate firms, rental property managers, private landlords, or other providers of housing including loans to determine if there is a difference in treatment based on race, color, sex, religion, national origin, disability, or familial status.

Testers are trained individuals who pose as home seekers. They visit real estate offices, apartment complexes, banks etc. and inquire about the availability of housing and or other services that are offered by the entity.

In addition to being funded by HUD, the Center has partnerships and conducted tests at the request of the Nebraska Equal Opportunity Commission, Omaha Human Rights and Relations Department, the Lincoln Commission on Human Rights, the Iowa Civil Rights Commission, Sioux City Human Rights Commission, Davenport Civil Rights Commission, the Des Moines Civil & Human Rights Commission, and for the cities of Fremont NE and Dubuque, Iowa.

TESTING DATA

Between the years of 2011 and 2016 the Fair Housing Center of NE-IA (the Center), conducted a total of 275 tests in Omaha, Bellevue and Council Bluffs. The Center categorizes the results of the tests 3 ways, Evidence, Inconclusive or No Evidence.

Evidence is determined when a housing provider:

- Does not make a unit available to an individual of a protected class
- Refuses to sell or rent to a person of a protected class
- Places different terms or conditions for occupancy on an individual of a protected class
- Will not allow a reasonable accommodation (waiver in policy) to a person with a disability
- Advertises or states a preference, limitation or discriminates based on a person's protected class
- Or a multi-family housing complex does not meet the design and construction requirements as set forth in the Fair Housing Act.

Inconclusive is determined when a housing provider shows some differences in treatment stated above, but not quite to the level of “evidence” as stated above.No Evidence is determined when a housing provider has treated both Testers’ equally.

Of the 275 tests conducted during 2011-2016:

- 53 tests were determined as evidence
- 94 tests were determined as inconclusive
- 128 tests were determined as no evidence

Therefore, in over half (53%) of the tests conducted showed some type of differential treatment/or does not meet design and construction requirements.

The following is a breakdown by year, city/town, protected class and determination of the tests conducted.

Omaha 2011							
	Race	National Origin	Disability	Familial Status	Sex	Other	Total
Evidence		4	6				10
Inconclusive	9	3					12
No Evidence	14	6	2	1			23
Total	23	13	8	1			45
Bellevue 2011							
Evidence							0
Inconclusive							0
No Evidence							0
Total	0	0	0	0	0	0	0
Council Bluffs 2011							
Evidence							0
Inconclusive	1						1
No Evidence							0
Total	1						1
Omaha 2012							
Evidence			6	1			7
Inconclusive	10	5	1		1		17
No Evidence	10	9	20	1		1	41
Total	20	14	27	2	1	1	65
Bellevue 2012							
Evidence							0
Inconclusive				1			1
No Evidence							0
Total				1			1
Council Bluffs 2012							
Evidence							0
Inconclusive							0
No Evidence	1						1
Total	1						1

Omaha 2013							
	Race	National Origin	Disability	Familial Status	Sex	Other	Total
Evidence		1	3	2	2	1	9
Inconclusive	3	1					4
No Evidence	9		3	1			13
Total	12	2	6	3	2	1	26
Bellevue 2013							
Evidence							0
Inconclusive		3	1				4
No Evidence		2					2
Total		5	1				6
Council Bluffs 2013							
Evidence	2						2
Inconclusive	3						3
No Evidence	3						3
Total	8						8
Omaha 2014							
Evidence	1		16				17
Inconclusive	6	5	24	1			36
No Evidence	2	2	16				20
Total	9	7	56	1			73
Bellevue 2014							
Evidence			1				1
Inconclusive							0
No Evidence		2		1			3
Total		2	1	1			4
Council Bluffs 2014							
Evidence			1				1
Inconclusive							0
No Evidence			1				1
Total			2				2

Omaha 2015							
	Race	National Origin	Disability	Familial Status	Sex	Other	Total
Evidence		1	1				2
Inconclusive		5	3				8
No Evidence	4	2					6
Total	4	8	4				16
Bellevue 2015							
Evidence							0
Inconclusive							0
No Evidence							0
Total							0
Council Bluffs 2015							
Evidence							0
Inconclusive							0
No Evidence							0
Total							0
Omaha 2016							
Evidence		2	2				4
Inconclusive		7					7
No Evidence	3	8	1				12
Total	3	17	3				23
Bellevue 2016							
Evidence							0
Inconclusive	1						1
No Evidence	3						3
Total	4						4
Council Bluffs 2016							
Evidence							0
Inconclusive							0
No Evidence							0
Total							0

COUNCIL BLUFFS

According to the State of Iowa Civil Rights Commission (ICRC), the city has two open cases within Council Bluffs regarding reasonable accommodation for a person/s with disability claim. Both claims originate in the 51501 zip code, which is located in the western portion of the City including the West End, South End and Mid-City neighborhoods. Since 2015, the ICRC has fielded 10 cases regarding fair housing within the City of Council Bluffs. (Attachment M).

BELLEVUE

The Fair Housing Center of Nebraska & Iowa provided information regarding fair housing complaints within the City of Bellevue by year.

Table V-77 Fair Housing Complaints Bellevue

Fair Housing Complaints							
Protected Class	2011	2012	2013	2014	2015	2016	TOTAL
Race	-	-	1	-	1	2	4
Color	-	-	-	-	-	-	-
Sex	-	-	-	-	-	-	-
Religion	-	1	-	-	-	-	1
National Origin	2	-	-	-	2	-	4
Disability	9	8	11	7	6	8	49
Familial Status	-	1	2	-	-	-	3
Other	-	-	-	-	-	-	-
TOTAL	11	10	14	7	9	10	61

SOURCE: Fair Housing Center of Nebraska & Iowa

The City of Bellevue is not party to unresolved legal issues or claims related to fair housing or civil rights.

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

OMAHA

The Nebraska Fair Housing Act can be viewed in full in Attachment N.

COUNCIL BLUFFS

Council Bluffs Municipal Code has the following protected statutes as part of the Council Bluffs Civil Rights Commission (Chapter 1.40) (Attachment O):

- 1.40.030 – Definitions. Definitions of each civil rights phrases
- 1.40.080 – Unfair employment practices. Discrimination laws regarding employment, labor organizations, and hiring practices
- 1.40.090 – Unfair practices: accommodation or services. Regulations regarding accommodations regarding leasing, site management, and rental properties
- 1.40.100 – Unfair or discriminatory practices: Housing. Discrimination laws regarding real estate and rental property for housing activities
- 1.40.110 – Unfair credit practices. Discrimination laws for credit approval, loans, business licenses
- 1.40.120 – Unfair or discriminatory practices: Education. Discrimination of participation in extracurricular activities, programs, or other activities within educational institutions
- 1.40.130 – Aiding or abetting. Intentionally aid, abet, compel or coerce another person to engage in any of the practices declared unfair or discriminatory
- 1.40.200 – City employment. Fair employment practices and recruitment within the City positions.

BELLEVUE

The State of Nebraska Fair Housing Act prohibits discrimination in housing on the basis of race, color, national origin, religion, sex, disability or familial status. Covered entities generally include residential property owners, property managers, realtors and multiple listing services. However, exemptions exist for dwellings owned or operated by religious organization and bona fide private clubs for non-commercial purposes, housing for older persons, and owner-occupied private homes in which no more than three sleeping rooms are rented.

Unlawful housing practices generally include discrimination in the advertisement, acquisition (showing, negotiating for or transmitting offers for sale or rental), financing, or possession and enjoyment (terms, conditions, privileges) of residential property.

The housing law also contains provisions barring retaliation. Anyone who has opposed any practice made unlawful by the statutes or who has participated in any manner in any proceeding to enforce the statutes is protected.

The Nebraska Fair Housing Law does place a deadline on filing. From the date of any alleged harm, the time limit for a housing charge is 1 year.

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

OMAHA

Many groups are working in Omaha to provide different services and resources regarding fair housing. The following organizations are included in those whose mission includes providing information and outreach and/or enforcement resources:

- Fair Housing Center of NE & IA
- HUD Fair Housing Hotline
- City of Omaha Human Rights and Relations Department
- Mayor's Fair Housing Advisory Committee
- Family Housing Advisory Services
- Metro Area Continuum of Care for the Homeless (MACCH) and partnering organizations

COUNCIL BLUFFS

The City works with a number of agencies to provide fair housing information:

1. Family Housing Advisory Services (regional): housing and financial counseling
2. Iowa Legal Aid (statewide): free civil legal service for income qualified
3. Heartland Family Service (regional): housing counseling and shelter service for homeless
4. League of Human Dignity (regional): assistance with housing modifications for income qualified disabled residents
5. Mosaic (regional): housing assistance for intellectually disabled
6. VODEC (regional): housing assistance for intellectually disabled as well as job assistance
7. Catholic Charities Domestic Violence and Sexual Assault Shelter (regional): housing assistance, financial and housing counseling for victims of domestic violence and sexual assault
8. MICAH House (local): housing counseling and shelter service for homeless families
9. Connections Area Agency on Aging (local): advocacy and assistance for senior and disabled populations regarding housing
10. NeighborWorks Home Solutions (regional): provides down payment assistance to income qualified home buyers purchasing new infill houses.

Resources for the agencies vary based on size and types of programs. The City works with many of the above providers to provide Community Development Block Grant (CDBG) funds to support the organization and its work in Council Bluffs related to housing counseling, shelter service and home modifications.

BELLEVUE

The City of Bellevue has information regarding fair housing available for all residents and distributes the information directly to those who call requesting assistance or ask questions. Information regarding fair housing is also available on the City of Bellevue website. For fair housing concerns and enforcement, the City of Bellevue refers residents to the Fair Housing Center of NE & IA and to HUD Fair Housing hotline.

4. Additional Information

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

These charts show the total number of fair housing complaints received and investigated by the Center and are broken down by protected class and year. The first chart reflects the total number while the second chart reflects the numbers for Bellevue, Council Bluffs and Omaha.

Fair Housing Complaints by protected class (#'s include all of NE and all of IA)							
	2011	2012	2013	2014	2015	2016	TOTAL
Race	12	15	18	21	28	57	151
Color	0	0	0	0	0	0	0
Sex	5	6	13	7	3	11	45
Religion	1	1	3	2	0	1	8
National Origin	19	13	16	6	21	32	107
Disability	141	154	159	230	200	270	1,154
Familial Status	12	11	14	13	6	7	63
Other *	12	10	11	5	4	2	38
TOTAL	202	210	234	284	262	380	1,572

FH Complaints by protected class for Bellevue (B), Council Bluffs (CB) and Omaha (O)																			
	2011			2012			2013			2014			2015			2016			TOTAL
	B	CB	O	B	CB	O	B	CB	O	B	CB	O	B	CB	O	B	CB	O	
Race	-	-	5	-	3	3	1	1	7	-	-	8	1	-	10	2	1	23	65
Color	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0
Sex	-	-	2	-	-	3	-	-	6	-	-	5	-	-	2	-	-	2	20
Religion	-	-	1	1	-	-	-	1	1	-	-	1	-	-	-	-	-	-	5
National Origin	2	-	5	-	-	8	-	-	6	-	1	1	2	-	6	-	1	7	39
Disability	9	14	60	8	9	63	11	20	61	7	25	105	6	16	91	8	10	103	626
Familial Status	-	-	-	1	-	2	2	1	7	-	-	2	-	1	2	-	1	2	21
Other *	-	-	8	-	-	6	-	-	4	-	-	5	-	-	-	-	-	-	23
TOTAL	11	14	81	10	12	85	14	23	92	7	26	127	9	17	111	10	13	137	799

*Other includes Age, Marital Status, and Sexual Orientation

The chart below reflects the total number of complaints received and broken down by industry.

Complaint Type (#'s include all of NE and all of IA)							
	2011	2012	2013	2014	2015	2016	TOTAL
Rental	194	207	233	279	262	373	1,548
Sales	0	1	0	0	0	0	1
Lending	7	1	0	0	0	0	8
Design and Construction	0	0	0	5	0	5	10
Advertising	0	0	1	0	0	0	1
Insurance	0	0	0	0	0	0	0
Other*	1	1	0	0	0	2	4
TOTAL	202	210	234	284	262	380	1,572

*Other includes rent to own and predatory lending

The following is a further breakdown by industry of the charts from the previous pages. In 2011, all of the tests conducted in Omaha, Bellevue and Council Bluffs were rentals.

Omaha 2012 (65)

- 27 Disability, all rentals, 6 evidence, 1 inconclusive, 20 no evidence
- 2 Familial Status, both rentals, 1 evidence and 1 no evidence
- 1 Other (marital status), rental, no evidence
- 14 National Origin, 8 lending (2 inconclusive and 6 no evidence) 6 rentals (3 inconclusive and 3 no evidence)
- 20 Race, all rentals, 10 inconclusive and 10 no evidence
- 1 Sex, rental, inconclusive

Bellevue 2012 (1)

- 1 Familial Status, rental, inconclusive

Council Bluffs 2012 (1)

- 1 Race, sales, no evidence

Omaha 2013 (26)

- 6 Disability, all rentals 3 evidence, 3 no evidence
- 3 Familial Status, all rentals, 2 evidence, 1 no evidence
- 1 Other (Advertisement), evidence
- 2 National Origin, both rentals 1 evidence and 1 inconclusive
- 12 Race, 6 lending (3 inconclusive and 3 no evidence), 6 rentals, all no evidence
- 2 Sex, both rentals, both evidence

Bellevue 2013 (6)

- All rentals

Council Bluffs 2013 (8)

- All rentals

Omaha 2014 (73)

- All rentals

Bellevue 2014 (4)

- 1 Disability, rental, evidence
- 1 Familial Status, rental, no evidence
- 2 National Origin, both sales, both no evidence

Council Bluffs 2014 (2)

- 2 Disability, both rentals, 1 evidence and 1 no evidence

Omaha 2015 (16)

- 4 Disability, all rentals, 1 evidence 3 inconclusive
- 4 Race, all rentals, all no evidence
- 8 National Origin, all rentals, 1 evidence, 5 inconclusive, 2 no evidence

Bellevue 2015 (0)

Council Bluffs 2015 (0)

Omaha 2016 (23)

- 3 Disability, all rentals, 2 evidence and 1 no evidence
- 3 Race, 1 sales, no evidence, 2 rentals, no evidence
- 17 National Origin, 5 sales, no evidence, 12 rentals (2 evidence, 7 inconclusive, 3 no evidence)

Bellevue 2016 (4)

- 4 Race, all sales, 1 inconclusive and 3 no evidence

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

OMAHA

- Lack of local public fair housing enforcement
- Lack of resources for fair housing agencies and organizations

COUNCIL BLUFFS

Fair Housing Enforcement, Outreach Capacity and Resources

1. Lack of local public fair housing enforcement
2. Lack of resources for fair housing agencies and organizations

BELLEVUE

Lack of local private fair housing outreach and enforcement

Private industry in Bellevue does not report fair housing outreach efforts. Without the knowledge of fair housing, reports of issues go unreported and then enforcement cannot take place. There is a need for additional awareness and information regarding fair housing for residents, landlords, property managers, realtors, and other housing professionals.

Lack of resources for fair housing agencies and organizations:

Bellevue lacks a site or office for the agencies and organizations supporting fair housing in our community. With limited fair housing services in the community, many complaints are referred to agencies in Omaha and HUD.

SECTION VI.

Fair Housing Goals and Priorities

GOAL SETTING PROCESS

Following the period of public engagement conducted for the Regional Fair Housing Assessment, program partners held meetings to analyze and interpret community comments alongside of HUD and local data in order to create regional fair housing goals. Each jurisdiction was also required to set goals specific to their community.

Regional program partners took the following required steps included in the HUD AFFH Rule Guidebook in order to set fair housing goals and priorities for the region and their corresponding jurisdictions:

“In the Assessment Tool, HUD provides a list of potential contributing factors in each section, accompanied by descriptions of those potential factors. Program participants must consider the HUD-provided list of potential fair housing contributing factors, along with the explanation of each factor, to determine whether any factor listed creates, contributes to, perpetuates, or increases the severity of one or more fair housing issues.

Program participants must also identify any other factors, not included on the HUD-provided list, if they create, contribute to, perpetuate, or increase the severity of one or more fair housing issues. In addition to the analysis using HUD-provided data, local data, and local knowledge in each section of the AFH, the community participation process may be of assistance to program participants in helping to identify and prioritize the contributing factors that should be the focus of the AFH. Under the AFFH rule, program participants must:

- Identify fair housing issues and significant contributing factors;
- Prioritize contributing factors, giving 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;
- Justify the prioritization of contributing factors; and
- Set priorities and goals to address the identified contributing factors and related fair housing issues (HUD, 2015).”

FAIR HOUSING ISSUES AND CONTRIBUTING FACTORS

City and Public Housing staff identified and prioritized the following contributing factors to fair housing issues as “medium” or “high” based on community engagement, HUD and local data for each jurisdiction.

Omaha

Contributing Factors of Jurisdiction

Fair Housing Issue	Contributing factors
Disparities in Access to Opportunity: Employment	This information represents the priorities identified by Omaha through the public engagement process combined with HUD and local data. <ul style="list-style-type: none"> • Location of employers • Lack of private investment in specific neighborhoods • Lack of public investment in specific neighborhoods including services and amenities
Disparities in Access to Opportunity: Transportation	<ul style="list-style-type: none"> • Availability, type, frequency, and reliability of public transportation
Disparities in Access to Opportunity: Education	<ul style="list-style-type: none"> • Location of proficient schools and school assignment policies • Lack of education in regards to landlord tenant laws
Disparities in Access to Opportunity: Environment	<ul style="list-style-type: none"> • Location of environmental health hazards • Environmental concerns associated with deteriorated and abandoned properties
Disparities in Access to Opportunity: Access to Low Poverty Neighborhoods	<ul style="list-style-type: none"> • Location and type of affordable housing • Access to financial services • Private discrimination • Lack of access due to high housing costs • Impediments to mobility • Lending discrimination • Lack of resources for fair housing agencies and organizations
Disparities in Access to Opportunity: RECAP (Racially and/or Ethnically Concentrated Areas of Poverty)	<ul style="list-style-type: none"> • Community opposition • Private discrimination • Deteriorated and abandoned properties • Displacement of residents due to economic pressures • Lack of private investment in specific neighborhoods • Lending discrimination • Location and type of affordable housing • Lack of affordable housing in a range of units and sizes • Source of income discrimination • Occupancy codes and restrictions

Omaha

Contributing Factors of Jurisdiction

Fair Housing Issue	Contributing factors <small>This information represents the priorities identified by Omaha through the public engagement process combined with HUD and local data.</small>
Disability and Access	<ul style="list-style-type: none"> • Source of income discrimination • Access to transportation • Location of accessible housing • Occupancy codes and restrictions • Lack access to opportunity due to high housing costs • Lack of affordable accessible housing in a range of units and sizes • Lack of assistance for housing accessibility modifications • Lack of affordable in-home or community-based services • Access to publicly supported housing
Segregation/Integration	<ul style="list-style-type: none"> • Community opposition • Cultural attitudes regarding race and poverty • Access to publicly supported housing for people with disabilities • Location and type of affordable housing • Lack of private investment in specific neighborhoods • Land use and zoning laws • Lending discrimination • Source of income discrimination • Private discrimination
Disproportionate Housing Needs	<ul style="list-style-type: none"> • Availability of affordable units in a range of sizes • Deteriorated and abandoned properties • Source of income discrimination • Lack of private investment in specific neighborhoods
Public Housing	<ul style="list-style-type: none"> • Community opposition • Source of income discrimination • Lack of private investment in specific neighborhoods • Occupancy codes and restrictions • Quality of affordable housing information programs • Siting selection policies, practices and decisions for publicly supported housing • Impediments to mobility • Lack of meaningful language access for individuals with limited English proficiency • Land use and zoning laws

Council Bluffs

Contributing Factors of Jurisdiction

Fair Housing Issue	Contributing factors <small>This information represents the priorities identified by Council Bluffs through the public engagement process combined with HUD and local data.</small>
Disability and Access	<ul style="list-style-type: none"> • Access to publicly supported housing • Inaccessible public or private infrastructure • Lack of affordable accessible housing in a range of units and sizes • Lack of assistance for housing accessibility modifications • Lack of affordable in-home or community-based services • Lack of local or regional cooperation
Segregation/Integration	<ul style="list-style-type: none"> • Cultural attitudes regarding race and poverty • Access to publicly supported housing for people with disabilities • Lack of assistance for transitional housing from institutional settings to integrated housing
Disproportionate Housing Needs	<ul style="list-style-type: none"> • Availability of affordable units in a range of sizes • Deteriorated and abandoned properties • Source of income discrimination • Lack of private investment in specific neighborhoods
Public Housing	<ul style="list-style-type: none"> • Community opposition • Source of income discrimination
<small>Disparities in Access to Opportunity:</small> Employment	<ul style="list-style-type: none"> • Location of employers • Lack of public investment in specific neighborhoods including services and amenities
<small>Disparities in Access to Opportunity:</small> Transportation	<ul style="list-style-type: none"> • Availability, type, frequency, and reliability of public transportation
<small>Disparities in Access to Opportunity:</small> Education	None
<small>Disparities in Access to Opportunity:</small> Environment	<ul style="list-style-type: none"> • Location of environmental health hazards
<small>Disparities in Access to Opportunity:</small> Access to Low Poverty Neighborhoods	<ul style="list-style-type: none"> • Location and type of affordable housing • Lack of access due to high housing costs • Impediments to mobility • Source of income discrimination

Bellevue

Contributing Factors of Jurisdiction

Fair Housing Issue	Contributing factors identified by Bellevue
	This information represents the priorities identified by Bellevue through the public engagement process combined with HUD and local data.
Disability and Access	<ul style="list-style-type: none"> • Access to publicly supported housing • Occupancy codes and restrictions • Lack of affordable accessible housing in a range of units and sizes • Land use and zoning laws • Lack of local or regional cooperation • Source of income discrimination • Access to transportation • Inaccessible public or private infrastructure • Lack of affordable in-home or community-based services
Segregation/Integration	<ul style="list-style-type: none"> • Cultural attitudes regarding race and poverty • Access to publicly supported housing for people with disabilities • Private discrimination • Community opposition • Source of income discrimination • Land use and zoning laws
Disproportionate Housing Needs	<ul style="list-style-type: none"> • Availability of affordable units in a range of sizes • Lending discrimination • Source of income discrimination
Public Housing	<ul style="list-style-type: none"> • Land use and zoning laws • Lack of meaningful language access to individuals with limited English proficiency • Source of income discrimination • Quality affordable housing information programs • Siting selection policies, practices, and decisions for publicly supported housing
Disparities in Access to Opportunity: Employment	<ul style="list-style-type: none"> • Location of employers
Disparities in Access to Opportunity: Transportation	<ul style="list-style-type: none"> • Availability, type, frequency, and reliability of public transportation
Disparities in Access to Opportunity: Education	None
Disparities in Access to Opportunity: Environment	None
Disparities in Access to Opportunity: Access to Low Poverty Neighborhoods	<ul style="list-style-type: none"> • Location and type of affordable housing • Lack of private investment • Lack of regional cooperation • Lack of resources for fair housing agencies and organizations

After identifying and prioritizing fair housing issues and contributing factors in each jurisdiction, program partners collaborated to determine common factors across the region. The following contributing factors were identified as medium and high priorities in each of the fair housing categories across the region:

Segregation/Integration:

- Community opposition including cultural attitudes regarding ability, race and poverty
- Access to publicly supported housing for people with disabilities
- Land use and zoning laws

R/ECAPs (Racially and/or Ethnically Concentrated Areas of Poverty):

- Lack of private investment
- Deteriorated and abandoned properties
- Lack of affordable housing in a range of units and sizes

Disparities in Access to Opportunity:

EDUCATION (Access to Proficient Schools)

- Lack of job/skills training programs for youth and adults
- Lack of support for families in areas including transportation, childcare, and health centers
- Lack of education regarding landlord tenant laws, financial services, and home ownership in multiple languages

EMPLOYMENT

- Location of employers
- Lack of private investment in specific neighborhoods
- Lack of affordable housing near major employers
- Lack of employers who provide housing and/or transportation for employees

TRANSPORTATION

- Lack of availability, type, frequency, and reliability of public transportation
- Lack of affordable housing along transit routes
- Lack of transportation resources for elderly residents and persons with disabilities

ENVIRONMENT (Access to Environmentally Health Neighborhoods)

- Age and deteriorating housing stock associated with environmental hazards such as lead, mold, asbestos, and radon
- Insects and rodents
- Noise pollution

ACCESS TO LOW POVERTY NEIGHBORHOODS

- Access to financial services
- Lack of resources for fair housing agencies and organizations
- Source of income discrimination regarding housing vouchers and SSI
- Lack of affordable housing policy

Disproportionate Housing Needs

- Location and type of affordable housing and lack of affordable housing in a range of units and sizes
- Source of income discrimination
- Deteriorated and abandoned properties

Disability and Access

- Lack of access to transportation
- Lack of affordable, accessible housing in a range of units and sizes
- Lack of assistance for housing accessibility modifications

Publicly Supported Housing

- Community opposition
- Impediments to mobility
- Quality and affordable housing information

GOALS

The following goals were created in order to address previously identified issues regarding fair housing. Bullet points indicate important actions steps.

Goals NE-IA Region

1. Increase accessibility of public transportation through education, outreach, and advocacy:

- Work with the CTC Education and Advocacy committee to provide education and increase outreach regarding methods of public transportation, ride sharing services, and accessibility.
- Assist MAPA in developing and disseminating a resource guide with options and/or requirements for specific transit programs.
- Partner and advocate for supportive land use policies regarding transportation.

2. Expand mobility for housing choice voucher holders in high opportunity areas:

- Increase the quality of outreach to landlords about housing choice programs.
- Create a resource for voucher holders to understand and evaluate options that meet their needs.
- Evaluating policies for setting payment standards between regional housing authorities.

3. Increase the supply of housing units for residents who are disabled and/or elderly across the region with a special focus on high opportunity areas:

- Petition the states of Iowa and Nebraska to incentivize development of affordable and accessible units in housing projects that receive state funding.
- Housing and Community Development Divisions will advocate for providing an allotment of housing rehab funds for accessibility modifications.
- Jurisdictions with HOME funds will revise HOME applications to include criteria or the accumulation of points for development of accessible affordable housing in areas of high opportunity.
- Regional partners will promote and support the inclusion of universal design standards into building codes.

4. Develop public-private partnerships with Housing Development divisions, the business community, and philanthropic groups to increase private development in R/ECAP, low-income, and high-poverty neighborhoods:

- Create partnerships with the Greater Omaha Chamber of Commerce and philanthropic groups.
- Find a currently established group that could focus energy and resources to create an asset inventory on a neighborhood level and a regional economic development level.
- Look for opportunities to coordinate as a region to apply for economic development opportunities.

5. Improve the environmental health of neighborhoods (with a focus on those in areas identified as meeting the requirements for federal assistance) by addressing deteriorated and abandoned properties, walkability, and transportation options:

- Research best practices, evaluate programs, and make recommendations to improve the process currently in place to address properties with code violations.
- Increase awareness of programs and agencies that may assist with hazard abatement.
- Promote information on how and where to report code violations.

6. Advocate for partnerships and best practices in regards to use of funds to increase supportive services and help create housing stability in publicly supported housing throughout the region:

- PHAs from region will attend meetings among human service providers regarding supportive services.
- Evaluate ways housing agencies might partner with regional service providers could assist in moving more resources to supportive services and increase stability for public housing residents.
- Attend Metro Area Continuum of Care meetings to collaborate and share information.

7. Creation of a Task Force to help promote fair housing goals, increase access to opportunity for protected classes, and prevent further inequity in housing:

- Advocate, educate, and disseminate fair housing information.
- Ensure the completion of Analysis of Impediments (AI) goals in a timely manner.

- Cost-benefit analysis of current regional policies impacting housing and development.

8. Provide a central fair housing resource to support education and access to opportunities in the region.

- The creation of a dynamic website where regional residents can find updates on the AI initiative, information about fair housing resources, and links to partnering organization and services
- Work with the Mayor's Fair Housing advisory board to create a marketing plan to promote the fair housing website across the city.
- Use the website to provide updates on goals to the community.

Goals City of Omaha

1. Increase the amount of affordable housing stock in high opportunity areas in Omaha:

- Collaborate with the Heartland 2050 Housing Affordability and Funding working group to promote education and advocacy for affordable housing across the city.
- Evaluate current incentives for the development of affordable housing and look for opportunities to expand and increase incentives.
- Create a mechanism for prioritizing fair and affordable housing elements in the proposal and selection process of projects requesting federal and state funding through City Planning Department programs.

2. Outreach to Omaha's refugee and new immigrant populations with tools that provide information regarding local rights and duties of landlords and tenant rights and responsibilities in order to help prevent against private discrimination:

- Creation of brochures regarding landlord tenant laws, rights, and responsibilities and contact information for reporting discrimination in the six most widely spoken languages in addition to English for the region.
- Create a video on landlord tenant rights and responsibilities for those who may not be able to read in their native language.
- Conduct workshops presenting landlord/tenant information, rights and responsibilities to multiple refugee and new immigrant populations.

3. Provide opportunities for community conversations on topics related to the history and future of segregation and integration in Omaha:

- Create opportunities for community-led events focused on stigma and stereotypes about race and poverty, redlining, and neighborhood revitalization.
- Seek opportunities to promote public art installations that reflecting the history of segregation and/or the conversations held about integration and moving forward together as a community.
- Meeting with City Council members providing information on the potential impacts of SID annexation on segregation and accessibility.
- Work to increase neighborhood capacity and support neighborhood-based planning

4. Increasing awareness and access for the disability and LEP communities in all City of Omaha programs and communications:

- Address communication for LEP communities and ADA accessibility statements for all City communications and public engagement.
- Training for all city managers on resources available for translation and ADA accommodations provided through the Human Rights and Relations Department.
- Work to identify liaisons in the community that can assist the City in reaching out to the LEP community for events and with program opportunities.

5. Provide mobility and/or affordable housing options for elderly and disabled populations who currently live in homes with multiple floors but cannot access or use amenities while simultaneously opening up opportunities for large family housing to serve refugee and new immigrant populations:

- Identify/find/recruit development partners interested in investing in affordable aging/disabled housing.
- Find a non-profit partner to help facilitate education on benefits of living in housing designed to provide amenities specifically for aging/disabled population.
- Work with non-profit partners to prepare refugee/new immigrant families for home ownership and/or renting homes that become available.

6. Increase funding for programs focused on demolition or rehabilitation of abandoned buildings and the sustainable management and development of vacant lots in eastern Omaha:

- Create a team including the City of Omaha, Omaha Municipal Land Bank, and Habitat for Humanity who can create a strategic plan and leverage funds to address abandoned and vacant properties and improve the quality of life in neighborhoods in R/ECAP areas.
- Work to diversify funding for rehabilitation of homes and vacant lots and use current redevelopment plans to identify places for projects/strategic use of funds to improve neighborhoods in R/ECAP areas.
- Identify best practices for sustainable and low maintenance vacant lot management in R/ECAP areas.
- Explore funding sources to help persons who qualify as 60% or less of AMI who live in R/ECAP areas maintain their homes and avoid code violations.

7. Reduce barriers to infill development in R/ECAP communities:

- Research infill development best practices for cities with similar size and demographics.
- Identify and address barriers through research and design of local codes.
- Implement zoning practices that meet the needs of neighborhoods and encourage infill.

8. Create effective network of communication between City Departments and the community:

- Create a new public engagement strategy for Housing and Community Development to disseminate and collect information from residents/neighborhoods/stakeholders.
- Create and distribute presentations on AI data to share with neighborhood and community groups.
- Hold workshops for the public on city departments and processes.

Goals Douglas County Housing Authority (DCHA):

1. Promote, educate, and advocate for building new housing developments in high opportunity areas within a range of sizes and for a variety of household types and levels of income.

- Educate private landlords, developers, public entities, and network with service agencies as opportunities present. (ongoing)
- Develop informational materials for local governments and community organizations to use to educate the public for the need for affordable housing. (by 1/2019)
- Coordinate with private developers and partnering agencies for “mainstream housing” vouchers for people with disabilities, nonelderly. Apply (by 10/2018)
- Research housing trust funds (i.e. Oregon) to determine feasibility of incentive housing for HCV recipients (by 6/2019)

2. Promote and advocate for additional transportation options in currently underserved (transportation) areas of the county (i.e. Western Douglas County). (on going)

- Request a seat and attend transportation committee meetings (by 7/2018).
- Develop a directory of current case management, social service providers, churches and transportation grant holders for underserved (transportation) (by 6/2019)

Goals Council Bluffs

1. Increase quality and number of affordable housing units for a variety of household types.

- NeighborWorks Home Solutions becomes Community-Based Development Organization (CBDO) by December 2018
- Advocate and prioritize funding for seniors and affordable housing along transit corridors, and in close proximity to health care, retail, and recreational facilities (Ongoing)
- Provide emergency assistance for the immediate repair and correction of hazardous housing conditions, which represent a threat to the health, safety, and well-being of the occupant(s) (Ongoing)

- Target the use of CDBG funds to support economically viable rehabilitation in homes for low-income members of protected classes to enable them to remain in their properties (Ongoing).
 - Increase the number of housing options with more than 3 bedrooms by 5% in the next 10 years.
 - Adopt a formal reasonable accommodation policy for housing that informs and provides clear direction to persons with disabilities on the process for making a reasonable accommodation by 2020.
2. Promote opportunities to move homeless into stable permanent housing.
- Increase the number of permanent supporting housing options for the chronically homeless by 5% in 10 years
 - Increase the number of handicap accessible permanent supportive housing options for the chronically homeless by 3% in 5 years.
 - Continue support of nonprofit agencies providing homeless services in Council Bluffs (Ongoing)
3. Improve the environmental health of Council Bluffs.
- Return vacant and blighted properties back into productive use by analyzing disposition policy and recommending changes and applying for EPA Brownfield grants (Ongoing)
 - Explore funding opportunities for Healthy Homes program to protect property occupants from environmental hazards including lead-based paint and improve energy efficiency. Lead safe and mold free (July 2019)
 - Work to reduce flooding within Council Bluffs by exploring new policies and practices around stormwater management (Ongoing)
 - Attend the 2018 National Lead and Healthy Housing Conference
4. Increase knowledge of local assistance programs and fair housing laws to disabled, limited English, and high poverty populations including but not limited to private businesses, nonprofit assistance and City programs.
- Revise and expand Language Access Plan (LAP) by December 2019
 - Expand fair housing outreach, education and enforcement activities and continue support for housing counseling agencies to provide tenant counseling to enable low-income households to remain in their rental units (Ongoing)

- Establish a fair housing education FAQ for landlords, realtors, and lenders and continue to focus programs and activities to prevent housing foreclosure and displacement (December 2018)
 - Utilize various media outlets to inform the public about issues related to fair housing programs and reports
5. Work with local employers to increase the number of quality jobs.
- Adopt economic development strategies that target development, retention and expansion of firms and industries that provide living wages (December 2018)
 - Provide support to nonprofit groups to assist low-income families in accessing programs to increase household financial stability (Ongoing)
 - Assist Advance Southwest Iowa Corporation with their business assistance, retention, expansion and new to market business programs (Ongoing)
 - Work with Iowa Western Community College for technical training programs geared toward specific jobs
6. Utilize outside funding sources to better leverage resources for local community development projects.
- Provide leveraged financing and recommend allocating federal funding and Low Income Housing Tax Credits (LIHTC) for mixed-income projects that are consistent and support redevelopment plans in priority areas (Ongoing)
 - Establish ongoing meetings with the state of Iowa to discuss housing policy and other issues related to community development (June 2018)
 - Revise footprint of City's Neighborhood Revitalization Strategy Area to meet changes in demographics (December 2019)
 - Advocate the Council Bluffs Housing Trust Fund to provide funding at a higher percentage to disabled persons and low-income persons (June 2018)
7. Improve and increase Council Bluffs transportation options including public transit, trails and sidewalks to benefit all citizens of Council Bluffs.
- Form partnerships between local governments and private employers to develop transportation options that connect low income and protected populations with job opportunities
 - Adopt and implement complementary mobility options such as walking, biking car sharing
 - Plan and execute a Bus Ridership program for Human Services/Resource Professionals

- Provide information to the Southwest Iowa Transportation Authority and other transportation providers regarding potential bus routes that would meet current needs within the CB community

Goals CBMHA

4. Expand mobility for housing choice voucher holders in high opportunity areas.
 - Hold a stakeholder meeting with local landlords and housing choice voucher program staff to discuss what type of information would be most helpful to have and share with landlords (December 2018).
 - Create a landlord survey in order to collect data about participation in the housing choice voucher program including why landlords do or do not participate in the program and what incentivizes or prevents their participation (June 2019).
 - Research best practices in housing choice programs for cities similar to the Omaha region (December 2019).
 - Present survey results and best practices at annual event for landlords (June 2020).

5. Advocate for partnerships and best practices in regards to use of funds to increase supportive services and help create housing stability in publicly supported housing.
 - Municipal Housing Agency will maintain partnership with Human Services Advisory Council (2018- 2023).
 - Municipal Housing Agency will work closely with local human services agencies to provide tenants with contact information of services they may be able to utilize (2018- 2023).
 - Municipal Housing Agency will work to create a guidebook of local human services agencies to provide tenants/ participants with information of services they may be able to utilize (December 2018).
 - Municipal Housing Agency will develop life skills curriculum and teach classes in the area of budgeting, housekeeping, and other life skills areas (December 2018).
 - Municipal Housing Agency will teach classes in the area of budgeting, housekeeping and other life skills (2018-2023).
 - Municipal Housing Agency will develop relationships with outside entities to provide information and resources for tenants in the area of life skills (2018-2023).

6. Renovate current units to make more accessible to tenants.

- Municipal Housing Agency will continue to apply for grant money through the Council Bluffs Housing Trust fund to renovate current units to make them more accessible (2018- 2023).
- Municipal Housing Agency will work with local contractors to provide renovations to current units with money gained through Housing Trust Fund grant (2018- 2023).
- Municipal Housing Agency will work tenants to meet needs through Reasonable Accommodations to renovate units to make them more accessible (2018- 2023).

Goals Bellevue

7. Increase affordable housing opportunities to expand housing choice by increasing quality and quantity of affordable housing units and the number of participating landlords in the jurisdiction.

- Research partners and funding sources to conduct a housing market study for the community and identify opportunities to use the study to enhance development and developer partnerships
- Review possible developer incentives to increase development of affordable housing and meet with necessary partners to develop, prepare and adopt incentives.
- Determine prospects to increase the available funding and programs for housing rehabilitations programs in the community.
- Work with City officials and departments to review current criteria for determining city project need to include accessibility and housing issues.

8. Identify opportunities to safeguard current and future zoning ordinances to encourage the development of affordable housing stock as well as utilize occupancy requirements that do not hinder fair housing choice.

- Work with local planning department to review current land zoning and develop proposal to increase multi-family zoning.
- Increase infill development opportunities by reviewing regulations and best practices to identify possible changes to the current regulations and develop proposals.

- Research opportunities to increase the percentage of newly constructed housing units that are affordable and accessible to people with disabilities.
9. Provide opportunities to alter the perceptions of community exclusion and diffuse opposition to affordable housing through knowledge and education.
- Research proactive marketing strategies to enhance community image and identify community stakeholders to assist with development of community strategies to propel movement forward.
 - Identify possible funding sources to assist with marketing strategies specific for the community.
 - Identify prospects to address Bellevue's aging infrastructure and necessary updates to ensure all residents have accessibility to services.
 - Work with the City of Bellevue ADA Committee to review current status of ADA Transition plan and infrastructure needs in the community along with identifying funding sources for assistance.
 - Develop programs and assistance to address housing accessibility modification needs.
10. Increase homeownership opportunities through financial literacy and promoting equitable access to credit and home lending.
- Identify partners, specifically lending agencies, to assist with reviewing current lending concerns to identify areas of opportunities for education and assistance.
 - Enhance educational materials and expand distribution and availability of materials.
11. Improve knowledge and access to services, programs, and assistance for the disability community and the LEP community.
- Conduct asset mapping project to locally available housing and public services.
 - Develop innovative ways to highlight existing programs available in Bellevue and review programs offered in the metro area to determine the feasibility and possibility of offering the programs in Bellevue and Sarpy County.
 - Identify community partners and host meetings to discuss plans to highlight current programs and possibility of future programs.

12. Increase the overall knowledge and understanding of fair housing with the community's developers, real estate professionals, financial institutions, elected officials and residents.

- Identify interested partners to facilitate fair housing workshops for landlords and housing providers
- Share and distribute fair housing information for renters.
- Work with local multi-family housing providers to provide information and education about fair housing to managements officials and tenants.

Goals BHA

4. Work to change community perceptions of opposition and community exclusion.

- Determine the feasibility of adding source of income as a protected class and research other community best practices.
- Assess the community and elected officials buy-in for the addition of a protected class to prevent discrimination in housing choice.

5. Develop access to publicly supported housing for all residents.

- Review and develop a Limited English Proficiency Plan with assistance for other community organizations and stakeholders.
- Review housing needs compared to make p of the waiting list to determine need for accessible units and draft proposal to make necessary modification.

6. Improve knowledge and access to services, programs, and assistance for the disability community and the LEP community.

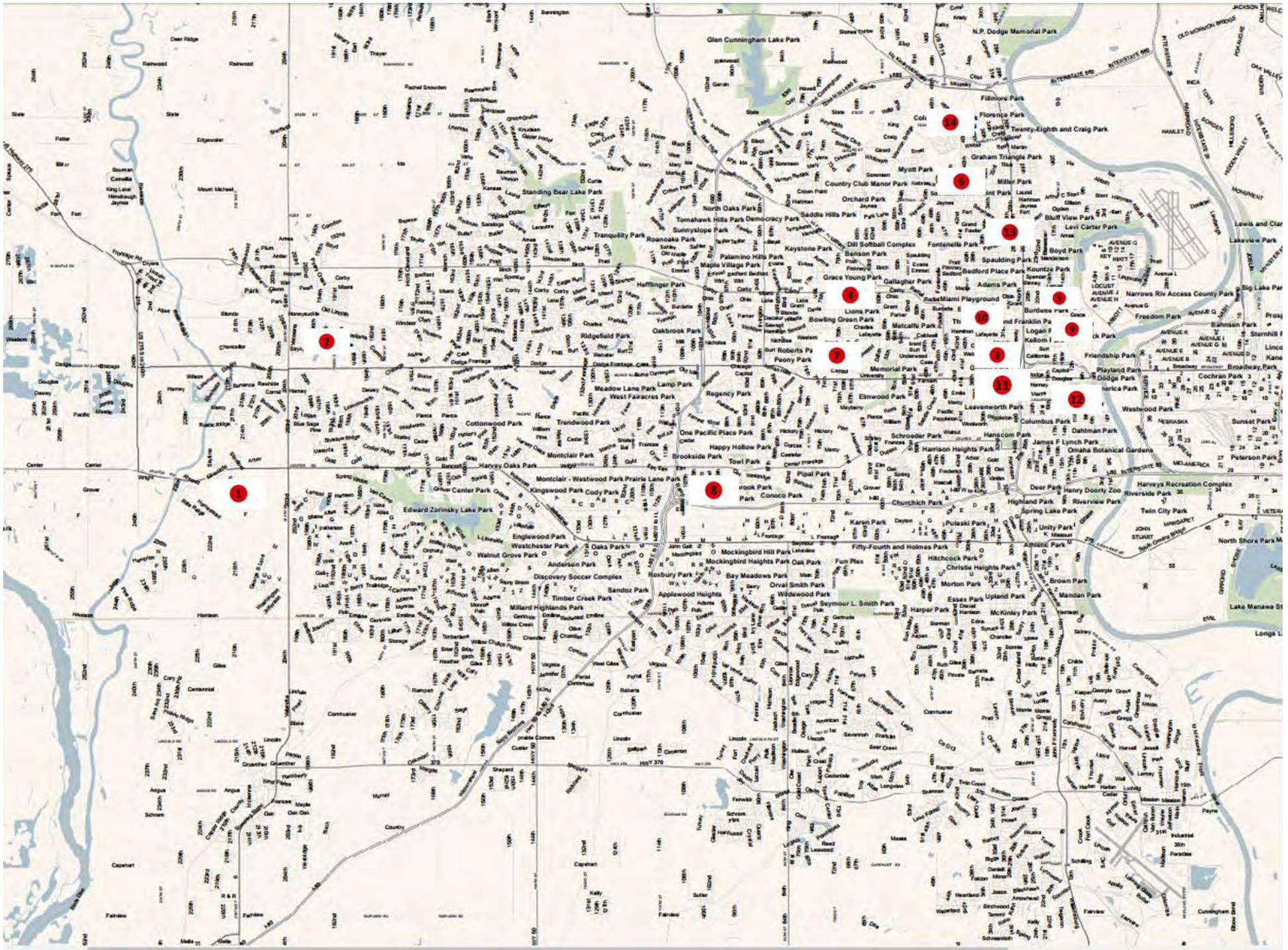
- Conduct asset mapping project to locally available housing and public services.
- Develop innovative ways to highlight existing programs available in Bellevue and review programs offered in the metro area to determine the feasibility and possibility of offering the programs in Bellevue and Sarpy County.
- Identify community partners and host meetings to discuss plans to highlight current programs and possibility of future programs.

- Review best practices and options for admissions and wait list policies and implements and proposed changes.
- Assist with implementation of a housing navigator program and research additional funding sources for continuation of the program.

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North /Midtown/ Southwest Omaha Open House

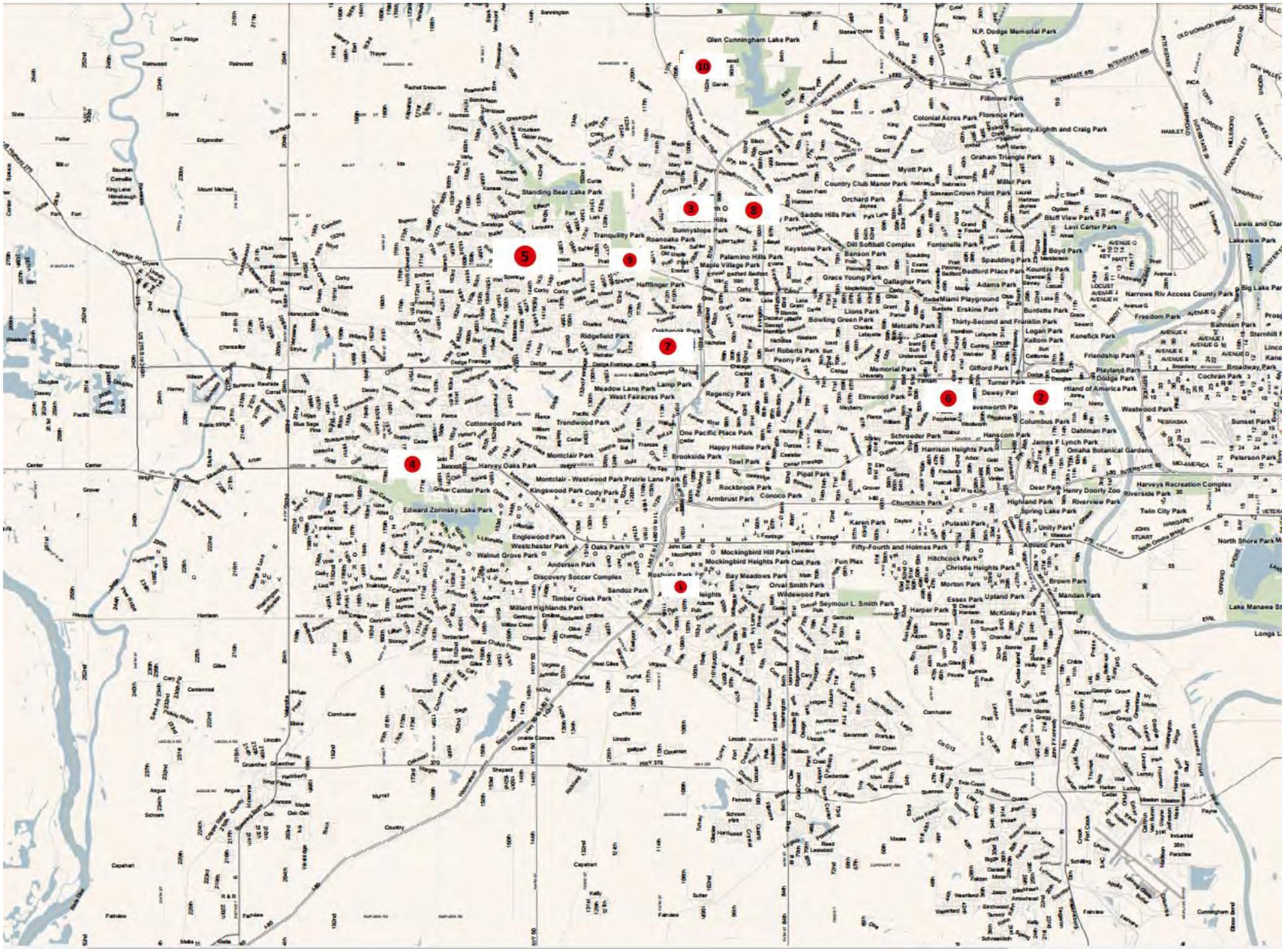


Comment worksheet



1	
2	Good proximity to shopping, quality schools, and familiar with the area
3	Love diversity and access to public transportation. Proximity to downtown
4	I love that I can hop on the bus and go almost anywhere. Also love the culture along maple St. and my neighbors are great.
5	Old people
6	I have the best view of Omaha and well-built tornado proof home. Good neighborhood
7	Peaceful area, no crime or very low crime. Great community, cost of living
8	Quiet neighborhood, good size lots, good treat canopy, well-kept area, middle of Omaha, in city, but not so city feeling
9	
10	Proximity to Adams park, near North Omaha's best assets, 24 th St. 30 th St, schools, parks, on transit route
11	I have always loved the view, close to downtown, airport, art district
12	I would like to live here for nightlife
13	Near downtown, near airport, good neighbor, walkable, flat land, new church, affordable
14	Good view, away from everything
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North Omaha 7-27-17 Open House



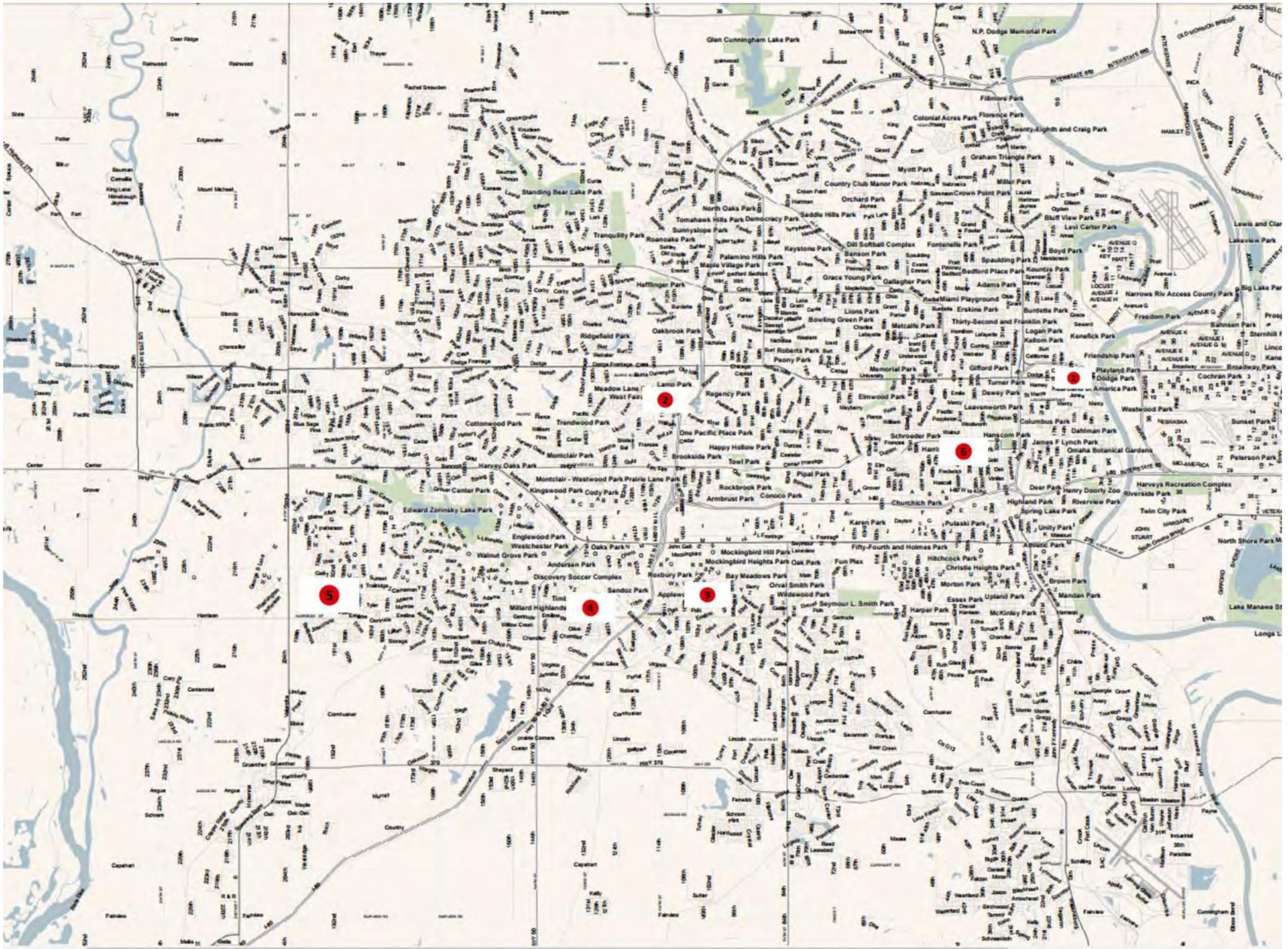
Comment worksheet



♥ = Current area

1	Where I currently live and have for 20 years
2	Grew up in this area. Love that everything is I frequent most is nearby
3 ♥	Just moved to 92 nd and Military. I like the area a lot because it's close to work and my family
4	Area seems to have more section of grocery stores and clothing.
5	Quiet neighborhood
6	Would most want to live here as it is the best area in Omaha as a whole. i.e. public transit
7	Where I see the greatest need for ADA affordable housing
8 ♥	Safe, NW police is close. Close I-80, ease to get to work. Grand ridge apartment will managed and care for.
9	Centrally located. Less crime
10	New homes are being built at this location, no traffic, and no crime
11	
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South Omaha 8/9/17 Open House



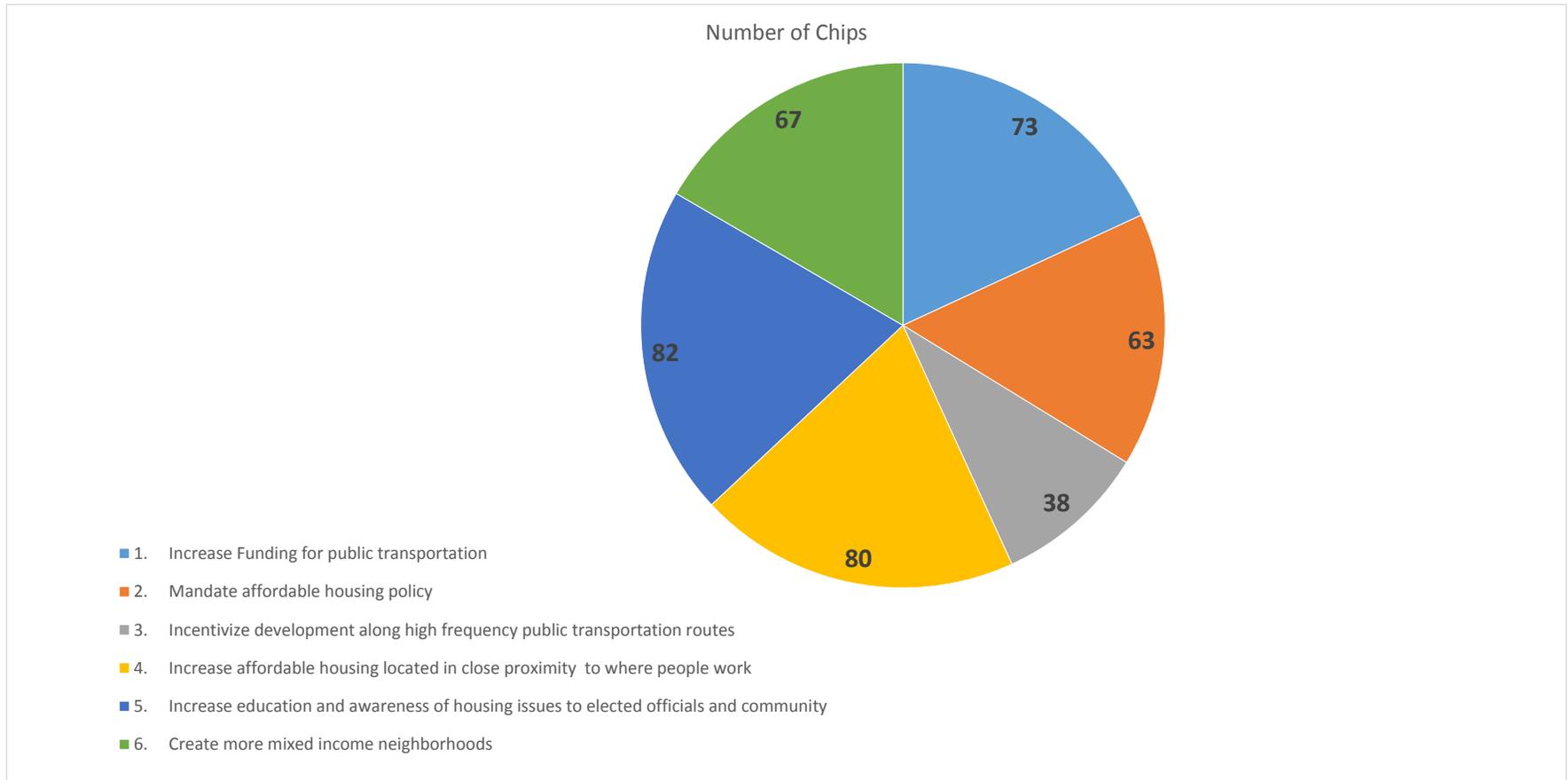
Comment worksheet



1	Where I used to live at, but moved because of cost. Would love to move back
2	Access to 6-80, housing prices, centrally located
3	To be closer to work and where my kids to go to school
4	I would like to live in west Omaha. Nicer, and feel safe
5	Towards the western part of Omaha. Good quality of living.
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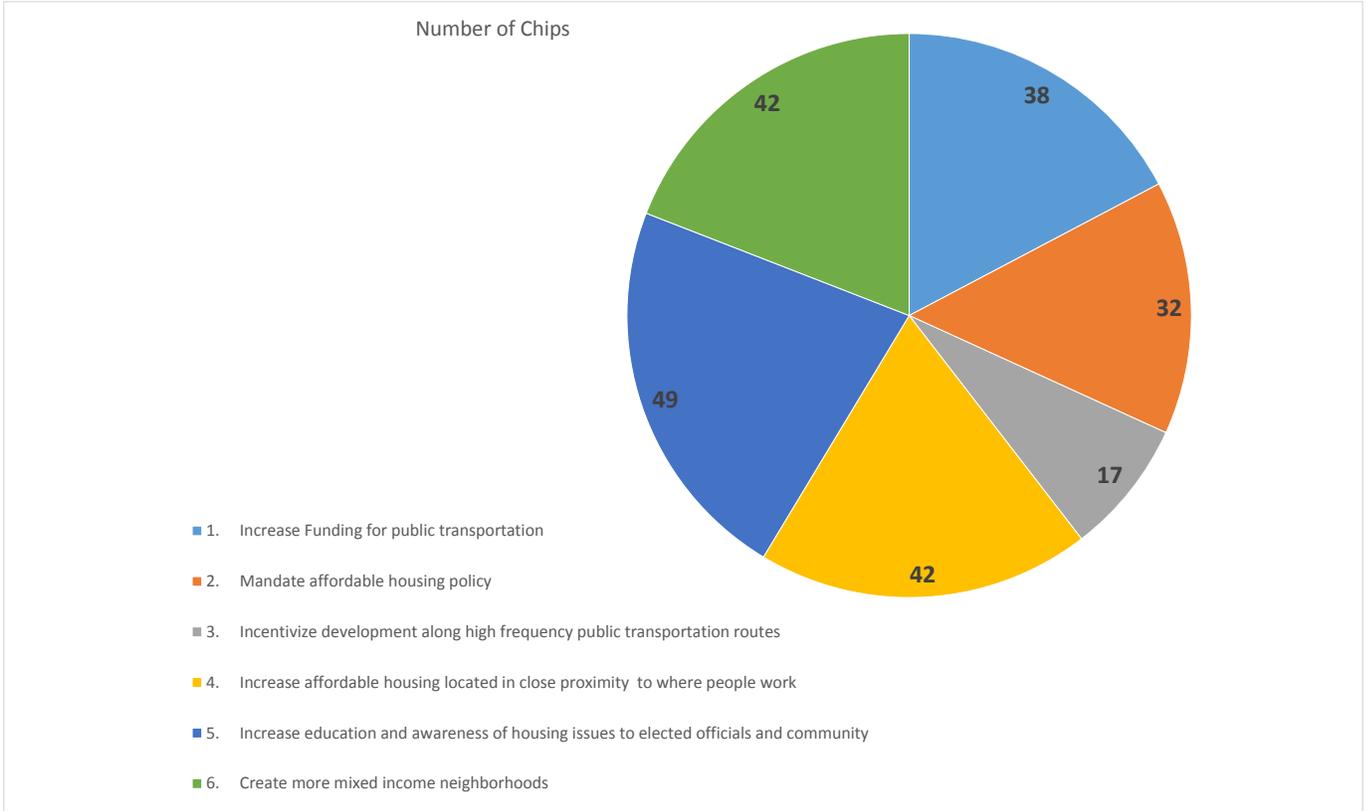
updated on: 8/14/17 **Master Sheet**

	Number of Chips
1. Increase Funding for public transportation	73
2. Mandate affordable housing policy	63
3. Incentivize development along high frequency public transportation routes	38
4. Increase affordable housing located in close proximity to where people work	80
5. Increase education and awareness of housing issues to elected officials and community	82
6. Create more mixed income neighborhoods	67



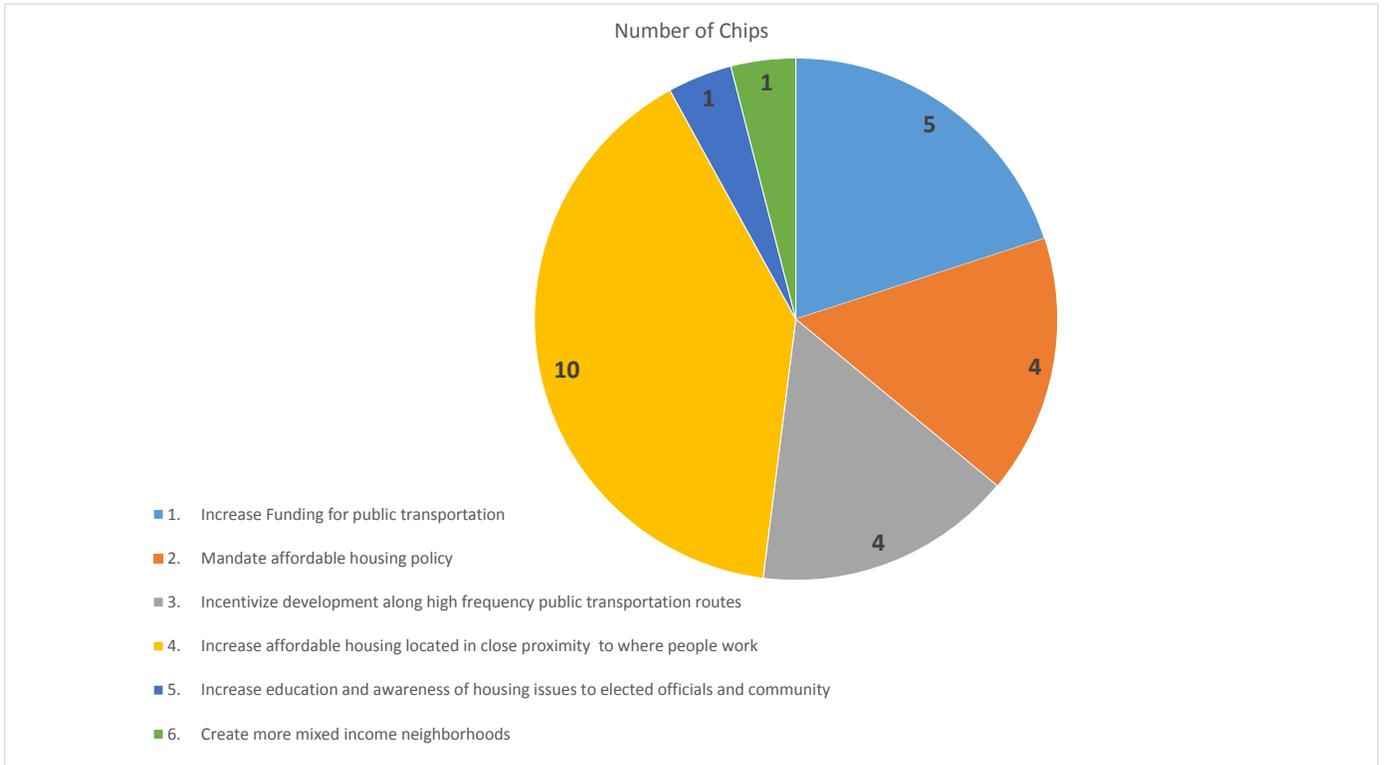
Midtown

	Number of Chips
1. Increase Funding for public transportation	38
2. Mandate affordable housing policy	32
3. Incentivize development along high frequency public transportation routes	17
4. Increase affordable housing located in close proximity to where people work	42
5. Increase education and awareness of housing issues to elected officials and cc	49
6. Create more mixed income neighborhoods	42



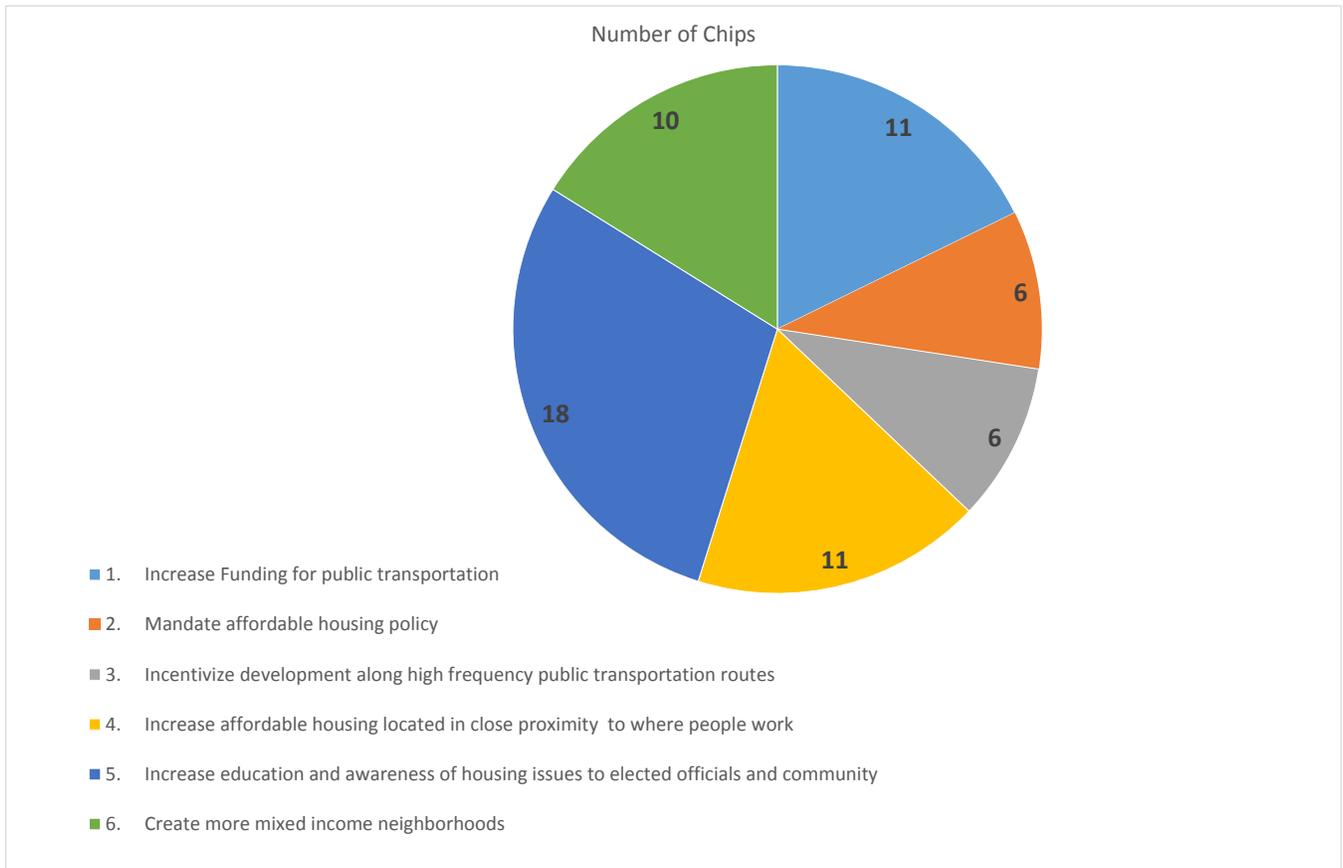
SouthWest

	Number of Chips
1. Increase Funding for public transportation	5
2. Mandate affordable housing policy	4
3. Incentivize development along high frequency public transportation routes	4
4. Increase affordable housing located in close proximity to where people work	10
5. Increase education and awareness of housing issues to elected officials and cc	1
6. Create more mixed income neighborhoods	1



North Omaha

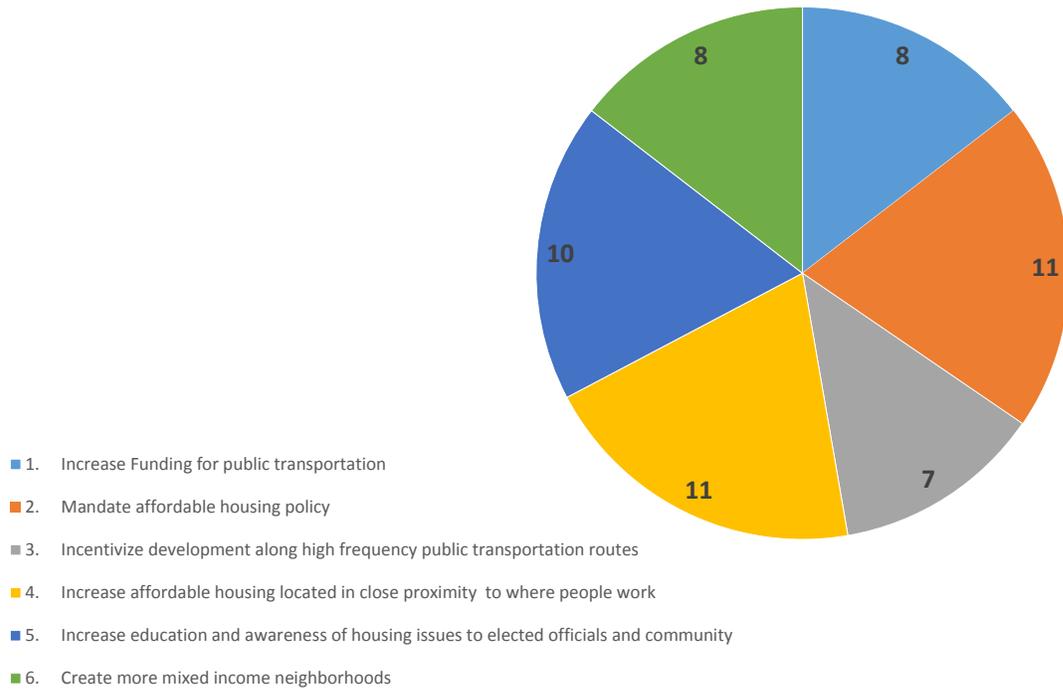
	Number of Chips
1. Increase Funding for public transportation	11
2. Mandate affordable housing policy	6
3. Incentivize development along high frequency public transportation routes	6
4. Increase affordable housing located in close proximity to where people work	11
5. Increase education and awareness of housing issues to elected officials and community	18
6. Create more mixed income neighborhoods	10



Northwest

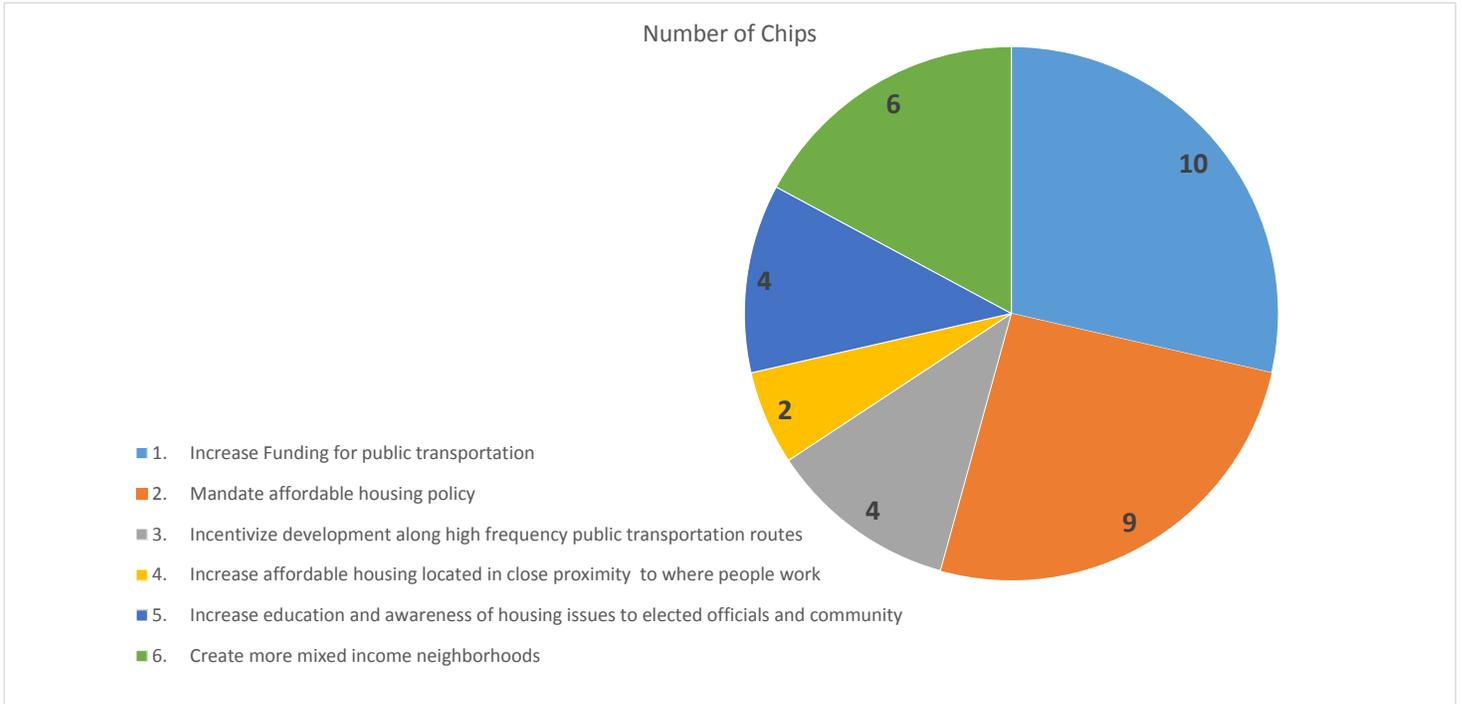
	Number of Chips
1. Increase Funding for public transportation	8
2. Mandate affordable housing policy	11
3. Incentivize development along high frequency public transportation routes	7
4. Increase affordable housing located in close proximity to where people work	11
5. Increase education and awareness of housing issues to elected officials and community	10
6. Create more mixed income neighborhoods	8

Number of Chips



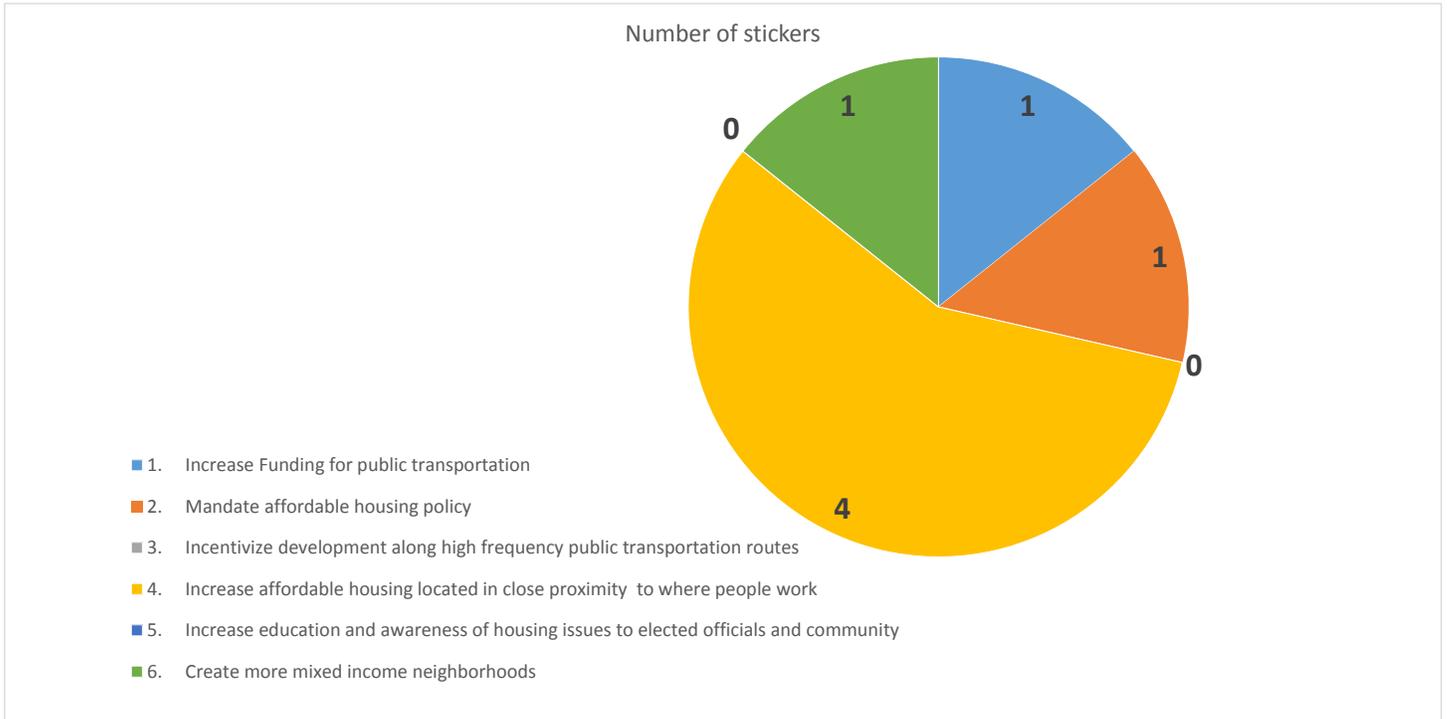
South Omaha

	Number of Chips
1. Increase Funding for public transportation	10
2. Mandate affordable housing policy	9
3. Incentivize development along high frequency public transportation routes	4
4. Increase affordable housing located in close proximity to where people work	2
5. Increase education and awareness of housing issues to elected officials and community	4
6. Create more mixed income neighborhoods	6



Empowerment Network

	Number of stickers
1. Increase Funding for public transportation	1
2. Mandate affordable housing policy	1
3. Incentivize development along high frequency public transportation routes	0
4. Increase affordable housing located in close proximity to where people work	4
5. Increase education and awareness of housing issues to elected officials and community	0
6. Create more mixed income neighborhoods	1



- Read through the most common issues and solutions that had been proposed by community leaders.
- After identifying the issue you find important, place a sticker that you think represents the best solution to that issue.
- Provide comments on worksheet next to this board in the comment box associated with number on your sticker.



Biggest Issues → Solutions ↓	Lack of transportation/ Lack of affordable housing near public transportation	Lack of affordable housing units all throughout the region	Concentration of racial and ethnic minorities in low income communities	Discrimination/ institutional racism	High quality Schools are not equally distributed throughout the region	Lack of accessible housing for people with disabilities
Increase Funding for public transportation	●●●●●	●●		●●	●	●
Mandate affordable housing policy	●	●●●●	●●●		●	●●●
Incentivize development along high frequency public transportation routes	●●		●			●
Increase affordable housing located in close proximity to where people work		●●●●●●	●	●●		
Increase education and awareness of housing issues to elected officials		●●●●●●	●●	●●●	●●	●
Create more mixed income neighborhoods			●●●●●●●	●	●●●●●●	



 = red Midtown Open House

 = Green Southwest Open House

 = Purple North Omaha Open House

 = Black, South Omaha Open House

 = Northwest Omaha Open House



MAPA Omaha - Council Bluffs Metropolitan Area Planning Agency

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***Affordable-** the term affordable housing is used to describe housing, rental or owner-occupied, that is affordable no matter what one's income is. The U.S. government regards housing costs at or below 30% of one's income to be affordable.
***Market rate-** Market Rate Housing. Refers to properties that are rented or owned by people who pay market rent to lease the property or paid market value when they bought the

What do you see as the most needed type(s) of housing? Pick 2



*South Omaha and Empowerment Network input combined
● = One World South Omaha Back-to-school event

Please list one or more ideas or strategies for how to improve programs or overcome barriers to opportunity/access in the following areas:

Education

Ideas for improving the quality of education for:

CHILDREN?

- Stop social promotions
- All youth must stay in school until 18
- Soccer fields
- city pool
- tutoring

ADULTS?

- More adult education programs for adults looking to further their careers
- Metro College needs to be better
- More core classes

Employment

What types of jobs would you like to see in your neighborhood/community?

- Construction (2)
- Retail entrepreneurs
- Dry cleaning
- Movie theaters
- Coffee shop
- Cement workers
- Masons
- Bigger shopping centers

Housing

What kind of development would you like to see in your neighborhood/community? Where specifically could you see this development being successful?

Recommended between Cummings & Lake Street:

- Better streets
- more cameras
- new housing

- up-to-date electrical grid
- volunteer clean-up every season

Recommended throughout North Omaha but also between N 16th and N 23rd Streets:

- Rehab of existing homes

Recommended for N 16th and N 24th and 30th Streets:

- Home ownership
- Economic development

Is there a specific demographic this development might serve?

- Young professionals
- Educators

What resources or programs would you like to see in order to improve the quality of current housing in your neighborhood/community?

- Use Land Bank programs
- Better use of rehab programs for housing
- Job training-it all starts with jobs

Environment

What is your greatest environmental concern for your neighborhood/community?

- Too many cars
- Not enough bike trails
- Keeping the streets clean and buildings tidy

Transportation

What transportation issues do you experience or hear that may prevent access to jobs, education, amenities or resources?

- Uber is helping
- Better east-west transit options
- If we had great transportation a large population could get quality jobs to provide for their families

1) How would you prioritize the issues above? **Please label the following with numbers 1 through 5**, 1 being the issue you find to be the most important or top priority and 5 being the least important.

__2__ Education

__2__ Education

__2__ Education

__1__ Employment

__3__ Employment

__1__ Employment

__4__ Housing

__1__ Housing

__3__ Housing

__5__ Environment

__5__ Environment

__5__ Environment

__3__ Transportation

__4__ Transportation

__4__ Transportation



Fair Housing Assessment Worksheet

Development Community

Prevalent Issues

1. What fair housing issues are most prevalent in the region
 - Concentration of poverty. Cyclical poverty
 - Lack of affordable housing
 - Lack of transportation to jobs
 - Schools w/o \$90billion investment
 - Difficult to find housing in district 66
 - Financing
 - Urban core
 - Rental issue
 - Disconnect between transit route/network and housing opportunities for low income
 - High cost of parking for development
 - Quality schools, employment, transportation, NIMBY
 - Schools
 - Transportation
 - Affordability in desirable area
 - Housing quality in low income areas
 - Clustered of low income housing
 - Concentrations of low income housing in isolate areas
 - Affordability
 - Housing condition
 - Concentrated poverty
 - Low income housing concentrated- not throughout the city
2. What housing challenges, if any, do marginalize communities' experience?
 - Quality of housing within income level/distance to and from work
 - Transportation to and from job, retail, for food
 - Rundown, high utility bill, bed bugs, roach infestation, rodent, poor insulation
 - Distance to/ access to employment
 - Good quality, low income housing
3. Has NIMBY (not in my backyard) been an issue for you?
 - YES
 - Negative perception of affordable and low income housing tenants
 - Yes, in district 66 blame lower income rental units for decline in test scores
 - Refugee settlement in county club
4. Any challenges leasing accessible unites to PWD (People with disability)
 - Affordability and access
 - Access- curbside bus aces
 - Cost to move too high

- Apartments with no elevators, limited first floor units
- Availability of units
- Medicaid cuts/lack of expansion. How to choose between north and availability of housing

Contributing Factors

- 1.) Is there a lack of incentives/capacity to build or preserve affordable housing?
 - Yes, land bank and political climate
 - Providing federal funding
 - It can be denied for no reason by landlords
 - There are no problems for residents in surrounding areas to guard against rent inflation
 - Need more funding mechanism
 - Boston property tax surcharge \$24 to fund affordable housing and preservation
- 2.) Are there zoning/regulations that result in higher rent/prices?
 - Urban design code
 - Yes, Blackstone renovation
 - Parking requirements
 - Yes, but not always a bad thing for with single family homes
 - Filing fee. \$1 goes to preservation projects
- 3.) Do marginalized communities experience disparities in access to employment? High quality schools? Transportation? Low poverty neighborhoods? Why or why not?
 - Institutional racism
 - Decline of industrial
 - Cheap land in hinterland
 - Low employment
 - Yes, there's a lack of access, geographically to prime areas of the city
 - Transportation issues
 - Education quality
 - Quality of homes
 - Childcare issues
 - Yes, they are isolated from having access to civic/urban amenities
 - History of institutional racism
 - Tax on lodge
 - Adaptive reuse ordinance in LA- don't have to do updated parking, green space
- 4.) What types of housing are in high demand in the region?
 - Single family
 - Affordable rental
 - Affordable homeownership
 - Affordable single family and all form of multi-family
 - Midtown apartment
 - Rental houses
 - Affordable housing
 - Higher density, housing in walkable communities
 - Affordability quality housing close to transportation/ work
 - Places with character-original woodwork
 - Make places that need fixed up affordable accessible

Strategies

5.) Who is underserved in the market?

- People that aren't wealthy
- We all are
- Low class citizen workers and families who qualifies or barely miss affordable housing limit
- Young homosexuals
- People with criminal history
- Medium to low income people
- People in poverty, nonwhite, PWD

6.) How would you mitigate housing issues in the area to increase access to opportunity?

- Mandate affordable housing policy
- Incentivize development in prime corridor and transit to and from low quality area
- Easier qualifications
- Infill housing programs
- Restoration
- Housing overhaul- special district for infill affordable housing along transit and benefits for building market rate in concentrated areas
- More funding mechanism for non-profit developers
- Require for-profit developers to provide more affordable housing



Fair Housing Assessment Worksheet

Disability/Accessibility Community

Access

1. How easy or hard is it for you or your clients to find a place to live?

If hard, Why?

- Low income (sec 8)
- Disability need accommodation
- ESA's (emotional support animals and dealing with cities that ban or don't understand fair housing laws)
- Lack of resources to locate or visit potential places to live
- Lack of funds to move, don't know where to move, or how to get moved
- Nonsupport in mental health
- Lack of transportation to find a place, hard to know what's available
- Knowing the area
- Lack of guidance
- Transportation
- Racial discrimination
 - Interracial couple
- Waiting list
- Support to maintain independent living
- Hidden disability
- No guidance
- Disruptive neighbors not accommodating to vulnerable disable population

2. Does your housing meet your accessibility needs?

- There are not enough Affordable/ accessible apartments for disable population
- No, old home, needs updating

Contributing Factors

3. In your opinion what is the biggest challenge to providing more accessible housing options

- Builders are not forced to build or include it in new development
- Funding
- Lack of knowledge for housing provider to understand ADA laws
- Education for developers
- People not knowing their rights
- Rehabbing old homes to be more ADA while keeping historic value
- Money
- Lack of understanding on housing options for the disable

4. If you need a modification or accommodation, why hasn't it been done? Cost? Landlord said no?
 - Cost, finding a person to do the work
 - Not enough small contractors
 - Resources and not enough knowledge
 - Older homes cost too much to modify
 - Unreasonable needs
 - Apartments don't allow chickens

5. What challenges, if any, do you experience related to transportation? Housing? Employment? Education? Accessing community amenities? Traversing your neighborhood? Town? City? Living in the most integrated, independent setting? Participating in community and civic activities?
 - Not enough affordable housing partitions-cabs expensive, bus route do not cover some areas. Moby drivers are impatient
 - Available and affordable transportation is difficult to find especially for the disable
 - More bus routes
 - More affordable housing on bus route
 - Lack of public or alternative transportation
 - Tell-a-Ride- Medicaid only
 - Tons of issues getting round town by bus
 - Lack of community outreach program
 - Most of us need to live with another person

Strategies

6. How would you address these issues?
 - Research
 - Assessments
 - Education
 - Developers
 - Landlords
 - Citizens
 - Advocate for resources



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AFFH Worksheet

Empowerment Network Village Community Meeting
Saturday, September 9, 2017

Employment/Education

The following strategies to increase access to employment and education have been identified as achievable in the metro region:

- Livable wage jobs
 - a. Increase funding for public transportation I I I I
 - b. Incentivize development along high frequency public transportation routes I I I I
 - c. Increase affordable housing located in close proximity to where people work I I I I
 - d. Increase education and awareness of housing issues to elected officials and community I I I
 - 1. Open jobs are not the same as jobs w/benefits

Do you think these strategies are achievable? Why or why not?

1. No. As long as there is racism and discrimination, these issues will not improve
2. No, based on societal woes. Too many obstacles that preclude people
3. All of these are possible
4. "C" is the hardest one to achieve because there are too many things/people out of control
5. A & B are achievable, C seems less realistic
6. Yes, most important to include individuals who are affected by each of these strategies to be part of the discussion and implementation
7. Yes
8. Yes, transportation is a barrier with most jobs in west O
9. Yes
10. Bring employers into the community. People don't always want to leave
11. I do think these are achievable because awareness is increasing
12. Yes
13. Yes, but they are big goals and will take time and funding and buying in
14. Yes, they are achievable with hard work and determination. Everyone want to do better and be able to provide for their family however lack of opportunities as well as systematic strategies prevent that from being attainable.
15. Yes, entrepreneurship be easily achievable. New business with new employees
16. No, need more people to care
17. Jobs in our community
18. These are very realistic and attainable strategies that are already in the works



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19. I hope so. The public transportation system is far behind small town and so unreliable.
20. Not focused on actual education, yes feasible but we should actually focus on education and tempting to shuffle the mindset of our youth
21. YES

i. What other strategies should we consider?

1. We need constant culture dependency training, education and minority in every job sector (government, business, education, etc.)
2. Encourage those in community to take advantage of programs that already exists
3. More strategies that address education and workplace preparedness. There might be a stronger connection between job relocation and safety concern
4. Align transportation routes w/ areas of employment
5. Ensuring people who are affect get a seat at the table
6. Increase social education
7. Increase/ frequency of public transportation
8. Further community engagement and discussion awareness about how they can support these solution, not just doing it for the people
9. Access to Metro (all of them) and UNO is a huge issue.
10. Instead of housing close to jobs, bring jobs closer to housing. Provide more opportunities and business closer to economically struggling communities
11. More transition programs for incarcerated individuals being released
12. More mental health education initiatives
13. Problem of unemployment and single paying job
14. Stipends, grants, loans for people and business to grow independently
15. Strategies to help students become college to career ready, prepare families/parents-educate them (college possible)
16. These 4 steps appear focused on employment mainly so as increase in education development is needed to focus on
17. Lots of red tape for people that don't fit the easy path of income and/or assets.
18. Subsidies with educators



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Racism/Segregation

Have you or someone you know experienced fair housing discrimination based on the following?
Select all that apply

- Relationship building is important- get involved
 - a. Race **IIIIIIIIIIIIIIII**
 - b. Color **IIIIII**
 - c. National origin **II**
 - d. Religion **IIII** (**refugee issues**)
 - e. Disability **IIIIII**
 - f. Familial status (marital status, with children, pregnant) **IIII**
 - g. Sex (this can include sexual orientation and gender identity) **II**
 - h. Others (not included in the definition of “protected class”)
 - 1. Felons
 - 2. Veterans
 - 3. Income

Have you experience more or less discrimination in the last 5 years?

1. What area of city and the types of housing the person qualified for
2. Less
3. Yes
4. Less, but still present
5. No
6. Less
7. No
8. Less
9. More
10. Some, but more in your face now
11. More
12. More
13. More subversive discrimination
14. Less, then more in the last year
15. No
16. More because of the times (government, freedom of speech)
17. MORE

Environment

What strategies or activities should be implemented to solve environmental health issues?

1. Diverse work staff at all levels in the housing, government, education workforce
 - a. I am concern about lead, water/air quality and mold for children playing in certain areas



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2. Free healthcare, mobile clinics to assist the needy
3. Lead
4. Lead, violence, waste management, recycling glass
5. Keep up lead testing programs, increase recycling
6. Take care of the trees in N.O, cut the branches, keep the lawn eye level
7. Have health department officials come to community meetings such as NON and Empowerment Network and update the community on community health and issues impacting the area such as environmental issues that correlate to health
8. Violence. Transparency- information available to public in ways that people can understand. Address blight issues ASAP to prevent spiral effect
9. Awareness campaign
10. Active work to implement sustainability initiatives that move Omaha towards an environmentally conscious city
11. We need to educate families on the health risks environmentally that can affect their families. Landlords need to also be held accountable for mold lead issues in their rentals
12. Environment health awareness fairs, education, cleaning program incentive based park rebuilding
13. Lead, parks and activities (safe for families), indoor air quality, education and services
14. Universal health care and health education
15. Addressing lead issues, voice, and trauma
16. Self-care. I agree with violence, but only way to resolve this is constant mindset shift and pride of ownership in families.
17. Violence- health environment. Glass recycling
18. Awareness of recycling and reusable products
19. Awerness

Transportation:

What percentage of their income they invest in transportation?

- 1) 20
- 2) 50
- 3) 15-20
- 4) 15
- 5) 10
- 6) 15
- 7) 25
- 8) 15-20
- 9) 3
- 10) 30



- 11) 59
- 12) 15
- 13) Public transportation does not go far enough and times to accommodate mid-shift or night shift
- 14) 12 (gas, insurance for car)
- 15) 20

Which of the following would you **prioritize** and **why**?

- 1) **Increasing job and career opportunities in North Omaha**
 - a) **IIIIIIIIIIIIIIIIIIII**
 - b) More jobs & opportunities in N.O can also provide an increase in capitalism which will also improve surrounding areas and increase redevelopment projects.
 - c) To improve N.O we need more jobs to be located in N.O
 - d) Need more walking distance jobs
 - e) More education, training, information
 - f) Shouldn't have to leave the community for good opportunities
 - g) With increase of employment decrease in poverty and crime. If people have a job/career to look less likely to use drugs and commit other crime
 - h) Better opportunities will automatically solve transportation issues
 - i) People will care more and be more connected to the community they live, work, and play in it. Empower our community. Can create integrated neighborhoods in N.O
 - j) Closer proximity jobs minimizes commute times and pollution
 - k) There are jobs, but access to employment for people who actually live there
- 2.) **Increasing access to transportation to get to jobs where it already exist?**
 - a) **IIIIIIIIII**
 - b) Easier to accomplish. Factory job for example are further out
 - c) If I knew my job was consistent and reliable, I would find away and hopefully improve my financial situation
 - d) We have job opportunities. Really its an ethic issue

Housing:

What percentage of our funding should go towards the following solutions?

- Place-based* _____
- 1.) 60
 - 2.) 50
 - 3.) 40
 - 4.) 25



MAPA

Omaha - Council Bluffs
Metropolitan Area
Planning Agency

Connect. Plan. Thrive.



- 5.) 70
- 6.) 60
- 7.) 40
- 8.) 25
- 9.) 50
- 10.) 70
- 11.) 30
- 12.) 60
- 13.) 50
- 14.) 70
- 15.) 70
- 16.) 75
- 17.) 75
- 18.) 60
- 19.) 75
- 20.) 65
- 21.) 75
- 22.) 70
- 23.) 25
- 24.) 50
- 25.) 50

Mobility Based _____

- 1.) 40
- 2.) 50
- 3.) 40
- 4.) 75
- 5.) 30
- 6.) 40
- 7.) 60
- 8.) 75
- 9.) 50
- 10.) 30
- 11.) 70
- 12.) 40
- 13.) 50
- 14.) 30
- 15.) 30
- 16.) 25



MAPA

Omaha - Council Bluffs
Metropolitan Area
Planning Agency

Connect. Plan. Thrive.



- 17.) 25
- 18.) 40
- 19.) 25
- 20.) 35
- 21.) 25
- 22.) 30
- 23.) 75
- 24.) 50
- 25.) 50M

Funding = 100



Fair Housing Assessment Worksheet

Transportation

Prevalent Issues

1. Do transportation issues create barriers to housing or access to opportunity for residents you serve? How?
 - Limited access to transit (underfunded and unsupported by land use)
 - Spatial mismatch between affordable housing and where people wants to live and go
 - Mismatch between employment and skillset/education
 - Housing choice limited by proximity to routes
 - Lack of bus services to reach employment centers out west (PayPal, Cabela's, etc.)
 - Frequency of transit services as well. Over an hour via bus to a job is not a realistic option
 - Coverage in some areas too low, and some are too high. Finding a balance
 - Sprawl/disconnect between areas where people live vs work
 - Areas with the greatest housing affordability are often far from employment centers and expensive/ difficult access from affordable areas
 - Mismatch of housing and employment, as well, as other daily services
 - Transit is focused on downtown and doge St. less access for low income to live out west and get to employment or recreation Areas.
 - Transportation in Omaha is a catch 22 for transit-dependent population.
 - People with disability, Sarpy county, school-students
 - Lack of convenient, low-cost transportation impact employment opportunity
 - The population is limited in mobility about the city so jobs that maybe accessible via car, aren't necessarily accessible via transit. This limits opportunity for schooling, employment, housing, fresh foods, and more.
 - Available jobs are too far away for those living in poverty
 - Without reliable
 - Without reliable transportation, it can be difficult to maintain a job, get a higher-paying job, or have a wide selection of job opportunities. Metro transit attempts to provide service for a large number of Omaha residents but funding is limited so there are areas of Omaha not served
 - Daily resource access- employment, disability community
 - Multiple children on the bus, time frame to take bus to work, cost, unreliable, routes doesn't line up with hours, can't afford car, call cabs
 - Potential jobs in Sarpy county but no transportation to get there
 - Bus routes to areas in time frame
 - Continue parties to fund transit to get people back in workforce
 - Disability

- Car ownership, disability, available employment, differing hours of transit, daily resources management, conflicting schedules, underage, 2nd shift
 - Being able to get jobs that people are qualified for from where they live via transit or walking
 - Barriers to having to live near transit and finding quality affordable housing
2. If you could identify one neighborhood (where people live or where services are located) and/or a protected class that is underserved in the market where or who would that be?
- Missing connection between NE/SE Omaha and SW Omaha
 - R/ECAP areas
 - For jobs in La Vista/Papillion
 - High poverty tracts
 - NE Omaha
 - North and South Omaha
 - North east and south eastern Omaha spatially
 - People with low and moderate income, and by default many with ethnic/ racial minorities
 - Expanded access to jobs via transit for north/central Omaha
 - Transportation for people with disability, west of 108
 - Recap, west Omaha
 - 60th St and Sorenson parkway south to Cuming St, East to the Airport
 - Ares in west Omaha and north Sarpy County are underserved by transit, primarily due to funding barriers (and geographic barriers).
 - Refugee population, N & South Omaha
 - Disable, east Omaha
 - Refugee, north and south Omaha
 - North Omaha

Contributing Factors

3. What factors contribute to fair housing issues/discrimination?
- Cost of transportation provision momentum
 - Institutional racism and historic racism
 - Call centers moved to southwest instead of relocating to industrial centers
 - Cost of providing transportation
 - Mismatch of housing and transportation
 - Racism, historic and current, individual and institutional
 - Housing
 - Employment sprawl
 - Lack of mobility and access to employment and other civic opportunities
 - Affordability of housing and access to transit service
 - Realtors
 - Perceptions about people of color and their value and ability
 - Income, reliable employment, race, religion
 - Redlining- landlord- realtors- race doesn't necessarily matters
 - Biased, judgment, gender, race, identify, income, disability, family, status
 - Jobs, education, health care access
 - Racism, prejudices, media coverage
 - Racial divide, historic concentration of minority communities, civic disconnect from certain areas

4. Do any local/state policies/practices contribute to fair housing issues? Which? Who is impacted?
- Lack of interagency communication
 - High fare/costs
 - Land use policy that encourage sprawl and automobile-dependency
 - Tax credits for development in downtown/ R/ECAP area
 - Not requiring landlords to accept vouchers
 - SID issues
 - Requiring a percentage of affordable housing in new development and rehab homes
 - Cost of putting transportation services on the street
 - High density rental in NE
 - Parking, SIDs
 - The transportation system
 - The ability to discriminate against section 8 vouchers adds to housing issues
 - Not sure of policies, but attitudes do
 - State law regarding transportation funding. Rural vs Urban
 - Section 8 landlords can deny based on funding source
 - State law public transit
 - Attitudes procedures about poverty
 - Where the city/county choose to invest money and publicity (type of publicity)

Strategies

5. How would you mitigate transportation issues in the region to increase access to opportunity?
- Higher public funding for transit, both locally and at state level
 - Investment in transit
 - Asking the community about needs
 - Incentive for business to locate on transit
 - Higher percentage of taxes going to transportation
 - Housing subsidy?
 - Pilot business transportation program
 - Increase affordable housing where people work
 - Encourage employers to locate closer to their workforce
 - More affordable housing out west
 - Make a percentage of section 8 mandatory in all rentals which are within price range. Increase transit and couple transit, housing, and employment
 - Transit oriented development
 - BRT will be a good step. Transit needs to be reasonable in terms of travel time to make it a viable option. 1 bus/hr. is not necessarily helpful in making area of town livable without a car
 - Incentivize commercial business to locate along existing transit particularly high frequency/ planned high frequency transit corridors (dodge, 24th, 72nd, Center, Maple)
 - Access, cost for people with disability
 - Car-sharing
 - Create transit/housing hubs
 - Increase gas prices
 - Put more funding towards public transportation. Ad campaign showing what other cities have done with how much they spend public

- Omaha needs more funding for public transit in order to provide more service over larger geographic areas.
 - More short routes for shuttles
 - Cost, EBT card for transportation
 - Ride share program w/ employees
 - Growth boundaries
 - Living close to where you utilize resources
 - Bike lanes, sidewalks
 - Shuttle systems, subsidized taxis, employer collaborations
 - Land use investment policies prevents land speculations in vulnerable areas
 - Provide greater investment in accessible public transit
6. Do planned transportation investments increase access to housing choice or opportunity?
How?
- BRT, infill and TOD land use changes
 - Bike facilities
 - Walkable neighborhood
 - Planning to include jobs, schools, amenities
 - Transit oriented planning
 - Increasing frequency of service
 - BRT for frequency/speed of service
 - Where route are changed we have to look at the impact on minorities that the change cause
 - They can, if they incorporate low and affordable housing and link to and include employment and services
 - BRT should for reason started above
 - More riders= more efficiency= higher service levels
 - Discussion of transportation to OTC, Embassy, PayPal, and Cabela's
 - Yes, very complex
 - Sarpy county transit study
 - Well-planned transit opportunities can provide better overall opportunities for residents. Higher frequency and greater areas served can make a huge difference, but are often traded off because the two due to funding.
 - Decisions made out of control of metro
 - Studies created to show need
 - More opportunity all around
 - Sarpy county transit study
 - No, need to create solutions for long term relief and access
 - Yes, if they are done correctly they can connect housing opportunities w/ jobs, schools, social services to allow people a greater choice in where they live

Comments:

1. What words, or phrases stand out?
 - a. Transportation
 - b. Autonomy
2. How does this make you feel?
 - a. Down
 - b. Frustrated
3. What did you find new or refreshing?
 - a. Many strategies are in place or in the works
4. What is the next step?
 - a. Getting into elected officials with solid and detailed information
 - b. Have a better communication flow, especially with the public
 - c. Connect land use to transportation



Fair Housing Assessment Worksheet

Non-Profit/Community Advocacy

Prevalent Issues

1. What fair housing issues are most prevalent in the region?
 - Affordability for safe, decent housing
 - Landlords not maintaining properties
 - Tenants- no way to file maintenance request
 - Housing in bus route
 - Closing of buildings to build condos
 - Transportation
 - Keeping up to code
 - Physical quality of homes
 - Internet access
 - Displacement from redevelopment in midtown
 - Access to daily needs via transit
 - Private sector not building affordable housing
 - SIDs (Sanitary and Improvement District)
 - Price
 - Discriminatory practices in landlords
 - Access to transportation
 - Affordability
 - House quality
 - Lead contamination
 - School quality/ choice
 - Contractors/ city
 - Living condition
 - Concentration of low income housing
 - Low transportation quality

Contributing Factors

2. What factors contribute to fair housing issues/discrimination?
 - Long standing history- unfair housing laws
 - Inequality in the city
 - Loss of income due to illness, transportation
 - Land owner wanting more money
 - Market rate for apartment and homes increasing due to re-evaluation
 - Family income
 - Education

- Availability of jobs
 - Unplanned growth
 - Jobs, other destination moving west (outside of transit network)
 - Walkability of west Omaha- low density
 - Cost
 - Transportation
 - Education/ employment
 - Food desert
 - Substance abuse/ incarceration
 - Institution racism
 - Urban sprawl- business moving to hinterland
 - Decline of industrial revolution
 - Property owners
 - Landlords can deny section 8 housing without a cause
3. Do any state/local policies/practices limit the ability of people with disabilities to live in independent integrated settings? Zoning? Family definition? Group home regulations? Medicaid reimbursement? How would you address?
- Policies benefits landlords- money- greed- politics
 - Need funding for transportation system
 - Quantify of accessible units (+ affordability)
 - Density of mixed-use along transit corridor
 - Transit
 - Invest more money public transportation infrastructure
 - State funding
 - Code enforcement at city level
 - Lack of accessibility for people with disability
 - Walkability
 - ADA accessibility at a neighborhood scale needs to be address
 - Zoning creates barriers
4. Do any local/state policies/practices contribute to fair housing issues? Which? Who is impacted? How address?
- Transportation to jobs, services- lift people out of poverty
 - Home valuation
 - Enforced regulation
 - State policy supporting rural housing and workforce housing more than urban housing.
 - More adequate housing in rural than urban
 - More money goes to rural than urban
 - SIDs- privatizing what should be public planning
 - Should be addressed at state level to fix Sarpy/ Douglas
 - Parking requirements raise rents
 - Lack of an affordable housing policy
 - Lack of code enforcement
 - School districts + funding mechanism
 - Budget for demolition
 - Assessor Diane L. Battiato + racism institution
 - Banks profit from poverty
 - Code enforcement at city level

- Small funding from HUD
- SID policies, rental/ section 8
- Availability of both low income and affordable housing

Strategies

5. How would you address these issues? Which protected classes are impacted?
 - City plan- city council- mayor- Douglas county- city code enforcement- human relations- social service agency- city and state
 - Funding for transportation
 - Plan neighborhood services
 - Money to support housing needs to relate to the population or amount of housing needs.
 - Black, women, and single parents-families are effected the most
 - Encourage affordable infill development in East Omaha
 - Provisions for affordable housing all over the city
 - We need to increase affordable transportation all low income area
 - Enable wages are essential and then lets about rental prices
 - Eliminate food deserts
 - Set locally determined fair housing priorities
 - Affordable housing policy mandate mixed income
 - Get a city manager
 - New funding mechanism for schools
 - Advocacy and organizing around these issues
 - Must push for elected official to make changes
 - Private sector must make a bigger impact in address issues, e.i housing segregation
 - More non-private developers
 - Housing policy overhaul
 - Make landlords accept a percentage of housing vouchers
 - Align transit with affordable/ low income housing
 - People of color and low/medium income household impacted



Fair Housing Assessment Worksheet

North Omaha Stakeholder

- Please list one or more ideas or strategies for how to improve programs or overcome barriers to opportunity/access in the following areas:
 - Life skills- financial literacy
 - Cooking
 - **Education**
 - **Support- health center- after school program- transportation**
 - **Keep class room sizes management**
 - **Free preschool- Buffett foundation**

Ideas for improving the quality of education for:

Children?

- Look into Connection Academy
- Smaller class sizes, better teacher evaluation and pay
- More work to connect with parents
- More attention paid to how kids learn in different ways
- More attention to culture
- After school program that do transport, health clinic at more schools
- Children in poverty need a more surrounded support of service to optimize their success in educational setting
- Small class sizes
- More ESL
- More alternative adoption
- Need to more towards a more robust approach to meet the needs of kids
- Incentives for teachers who work in R/ECAPS
- ESL in N.O
- More tutors, more teammates, free preschools
- Desegregation and bussing
- More trade, getting kids experience with careers

Adults?

- Community center for setting a GED program
- Transportation availability, childcare
- More information about the variety of educational services and opportunities
- More financial help with aspect of student paying back financial loans
- ESL classes with daycare
- Mix of college educated and skilled jobs
- ESL teaching at N.O Learning center
- MCC providing affordable childcare
- Buses running frequently to MCC
- Access to community college and certification training → local scholarship

- More adults to work individually on English
- Language with immigrants
- Child care
- Business adopt a school (job shadowing or internships)
- Relevant job training

▪ **Employment**

What types of jobs would you like to see in your neighborhood/community?

- Use history preservation method to employ people in order to keep the history fabric
- Manufacturing, tech
- Youth/ sports programs and activities
- More diverse job training programs, with direct movement to job
- Retail, entry level
- A mix Retail/ entertainment/ FedEx, UPS drivers
- Retail & entry level jobs
- More trade and trade training
- Tech and trade clubs
- More jobs of all types in N.O
- More jobs of all levels
- SNAP and get people inventive to get out of poverty

How could community or financial support assist current programs or create new programs to increase participation in the labor market?

- HUD housing funds, or any of the federal housing funds, AmeriCorps volunteers (all ages)
- Better outreach to encourage people to attend
- More access to workforce solution places
- More awareness/access to workforce solution program
- Outreach= coding, 4-mos certification/ Awareness= step-up, 2 building of Workforce Solutions
- Increase contracts

▪ **Housing**

What kind of development would you like to see in your neighborhood/community?

- Provide paid incentive for neighbors to cut grass and shovel
- Community spaces, coffee/ restaurants
- Affordable and accessible housing for those with physical disabilities
- A mix housing classes and training more easily available and affordable.
- Mix use of housing- size and affordability within neighborhood so that diverse people form neighborhood
- Rehab vacant prop
 - Land bank
 - Holy name housing
- More public transportation, more access to libraries, community centers, opportunity for home ownership to those who have been in the area a long time
- Rehab of vacant/ abandon property
- More affordable housing & rental property that are not rundown
- Hold landlords accountable to decent property
- More home rehab
- More yard clean up
- Need for more low income housing, but need scattered site housing rather than larger concentration on low income

Where specifically could you see this development being successful?

- Florence/ Minne Lusa
- All over cities and counties
- City investment
- Land bank purchase of vacant homes
- City attorney enforce city code violation fines and complains
- N.O, NW Radial and Maple
- Areas where housing codes are not enforced

What resources or programs would you like to see in order to improve the quality of current housing in your neighborhood/community?

- Better community cohesion. Neighbors reaching out
- PACE program
- Training/support for first time buyers
- City investment in legal advisor/attorney to prosecute non-compliance city ordinances
- Pass laws for apartment to be accountable for safety as they have done in Council Bluffs

▪ **Environment**

What is your greatest environmental concern for your neighborhood/community?

- North Omaha power plant, lead, poorly enforce regulations
- Lead and asbestos
- Lead, air pollution, mix yard waste, trash/ more composting, residential PAC program
- Safe affordable housing
- Water waste, more awareness of water quality, landfill for yard waste, residential PACE program
- Composting- water quality-Lead, PACE residential program
- Lead & water quality
- Lessening of regulations, lack of oversight
- Create more opportunity for people to connect with their neighbors
- crime

▪ **Transportation**

What transportation issues do you experience or hear that may prevent access to jobs, education, amenities or resources?

- Streets are poorly navigable for those w/ mobility issues. Sidewalks along 30th are very narrow
- Lack of more bus routes to Bellevue
- City needs more user friendly transportation system with routes and time determine by user input, more knowledge about routes. Mayor office encouraging and promoting transportation use.
- Not enough public transportation
- Limited lines, multiple transfers, not running frequency enough, not accessible everywhere
- More city promotion of public transit
- More MOBY
- All public transit not access. Need to have metro, cabs, schools, UBER, Lyft, other meet and use available resourced to make transit more accessible.
- North and South routes seems less available than East and West
- No bus transportation on after 11

- How would you prioritize the issues above? Please label the following with numbers 1 through 5, 1 being the issue you find to be the most important or top priority and 5 being the least important.

2 Education

Rating	1	2	3	4	5
# of people	**	***	**	**	

1 Employment

Rating	1	2	3	4	5
# of people	*****	***		*	

3 Housing

Rating	1	2	3	4	5
# of people	**	**	****	*	

5 Environment

Rating	1	2	3	4	5
# of people			**	*	*****

4 Transportation

Rating	1	2	3	4	5
# of people		*	*	****	***

- What current programs or organizations are you aware of that address barriers to opportunity or access to resources for your community/neighborhood?
 - Fair housing Dept.
 - OTOC Housing Action Team
 - Fair Housing
 - Habitat
 - Omaha Equity

Group Answer

1. Please list one or more ideas or strategies for how to improve programs or overcome barriers to opportunity/access in the following areas:
 - a. Education
 - i. *Children*
 1. Skill training program at MCC> Access to internet
 2. Afterschool programs and transportation
 3. Job training in school for children and education about opportunities other than just college
 4. Addressing behavioral issues/ attention issues
 - a. Alternative education options
 5. Support for teachers and developing skills
 6. Desegregation and extended housing
 - a. Louisville, KY might be a model to look at
 7. More tutor/ teammates/ mentors
 8. More ELS w kids

9. Free preschool for everyone
 - a. Buffett Foundation has done some preschool in OPS
10. Class sizes
11. Better methods of teacher evaluations
12. Community involvement
 - a. Sports coaches, community service projects
13. Teaching kids life skills/ financial lending/ budget
- ii. *Adult*
 1. Job ready education
 2. Affordable childcare for adult
 3. Better transportation
 4. Childcare
 - a. Cost of childcare provider is often insurance
 5. Public transportation
 - a. Bellevue has one express bus per day each way times are odd
 6. Financial aid
 7. Community involvement
 - a. Staff at college learning community needs
- b. Employment
 - i. Jobs in neighborhood- need training
 - ii. Address need for skills job/ good pay jobs that don't require college necessarily
 - iii. Workforce solution programs
 - iv. Outreach to young employed people
 - v. More trade training/ fix things
 - vi. Club/ after school
 - vii. Complaints about black-owned business not getting city contracts
- c. Housing
 - i. Affordable, multi family
 - ii. Poor landlord mandatory inspection
 1. 75% of complaints are in rental properties
 - iii. Addressing vacant properties and code issues
 - iv. City attorney designated only for code enforcement and housing
 - v. Rental property registration
 - vi. Residential PACE program
- d. Environment
 - i. Lead, crime, lack of physical activities, neighbor isolation
 - ii. Waste management return to composting
 - iii. Air quality asthma
 - iv. Awareness of water quality
- e. Transportation
 - i. Frequency and routes increased
 - ii. City support/promotion of transportation
 - iii. Using all resources
 - iv. More MOBY

Comments:

1. Lack of affordable homes contributes to long waiting list and people dying while on the waiting list.
2. Comments and common themes
 - a. Education
 - i. Life skills
 - ii. Financial literacy
 - b. Housing
 - i. Quality in home in variety of income level
 - ii. Enforcement of city code
 - iii. All abilities
 - c. Environment
 - i. Knowing where to report environmental issues
 - ii. Knowing regulations about environmental issues
 - iii. Apartments needs more recycling options
 - d. Transportation
 - i. Buses need to run after 11pm
 - ii. Narrow sidewalks makes it unsafe to walk on and bus stops
3. Political will
 - a. Keeping eyes on legislations



Comments and Concerns

Zip Codes Represented:

68104 (2)	68132	68135
68106 (2)	68138	None listed (1)
68110	68111	51503
68108	68114	

Disparities in Access to Opportunity

Transportation

Contributing Factors/Barriers to Accessing Opportunities	Prioritization TOTALS LISTED in ()
1. Lack of availability, type, frequency, and reliability of public transportation.	H(11) M (2) L (1)
2. Lack of affordable housing along transit routes	H(9) M(3) L(2)
3. Lack of accessible transportation resources for elderly residents and persons with disabilities.	H(3) M(7) L(4)
4. Other: How to gain understanding of information on accessibility <ul style="list-style-type: none"> Paratransit service is limited to bus routes, express routes exempt. We are doing the minimum service mandate by ADA. Better transportation to jobs 	

Employment

Contributing Factors/Barriers to Accessing Opportunities	Prioritization TOTALS LISTED in ()
1. Location of employers (Example: spatial mismatch between the location of major employers and the largest population of unemployed residents. Also a mismatch between the types of jobs located nearest residents in eastern Omaha and Council Bluffs and the education and job skills required)	H(10) M(4) L (0)
2. Lack of private investment in specific neighborhoods. Impacts density and available amenities leading to lack of jobs in or near high poverty and/or minority majority neighborhoods Additional comments: <ul style="list-style-type: none"> Lack of serious local government 	H(9) M(4) L (1)
3. Lack of affordable housing near major employers and/or a lack of employers who provide or invest in housing and/or transportation for employees.	H(10) M(4) L (0)
4. Other: Transportation Limitations <ul style="list-style-type: none"> Worker preparedness and skills to be gainfully employed. 	

Education

Contributing Factors/Barriers to Accessing Opportunities	Prioritization TOTALS LISTED in ()
1. Lack of education and/or job skills training for both youth and adults (Example: job shadowing and internships)	H (7) M (5) L (2)
2. Lack of services for families that support access to education. (Examples: better transportation, childcare, health centers, after school programming)	H (7) M (6) L (1)
3. Lack of education on landlord tenant laws, financial services, and home ownership to a broad range of residents and in multiple languages.	H (7) M (4) L (3)
4. Other: Need places to complain and seek help <ul style="list-style-type: none"> Lack of education to landlords-discrimination and fair housing 	

Environment

Contributing Factors/Barriers to Accessing Opportunities	Prioritization TOTALS LISTED in ()
1. Deteriorated and abandoned properties. Aging and poor quality of affordable housing stock associated with environmental health issues including lead, mold, asbestos, radon not being addressed	H (8) M (4) L (2)
2. Insects/rodents	H (6) M (8) L (0)
3. Noise pollution	H (2) M (8) L (4)
4. Other: Does not cost much more in the development stage instead of after the fact.	

Access to Low Poverty Neighborhoods

Contributing Factors/Barriers to Accessing Opportunities	Prioritization TOTALS LISTED in ()
1. Access to financial services	H (6) M (7) L (0) One no vote
2. Lack of resources for fair housing agencies and organizations	H (3) M (7) L (4)
3. Lack of affordable housing policy	H (9) M (4) L (1)
4. Other: Transportation limitations Have to change policy, we can legislate against racist policies Needs to be part of developing neighborhoods	



Comments and Concerns

Zip Codes Represented:

68106 (3)	68104	68154
68131	68117	68108
68105 (2)	68111	
68114	68132	

Public Housing

Contributing Factors/Barriers to Accessing Opportunities	Prioritization TOTALS LISTED in ()
1. Community opposition (Example: NIMBYism-Not in My Back Yard mentality)	H (8) M (4) L (4)
2. Impediments to mobility (Examples: lack of mobility counseling, lack of appropriate payment standards-vouchers meeting rental <i>market rate</i> , <i>available properties</i> , <i>interested landlords</i>)	H (4) M (7) L (5)
3. Quality and affordable housing information programs. (<i>Example</i> : education programs aimed at increasing the pool of landlords accepting vouchers.)	H (4) M(12) L(0)
4. Siting selection policies, practices, and decisions for publicly supported housing. (Integrated into neighborhood available throughout the city)	H (9) M(3) L (2)
5. Other: <ul style="list-style-type: none"> • Racism • Advocates for victims of discrimination • Place to complain • Resources for help with issues • Need for more ADA public housing and prioritization in section 8 	

Disability and Access

Contributing Factors/Barriers to Accessing Opportunities	Prioritization TOTALS LISTED in ()
1. Lack of access to transportation	H (9) M (6) L (1)
2. Lack of affordable, accessible housing in a range of units and sizes	H (11) M (5) L (1)
3. Lack of financial assistance for housing modifications	H (8) M (6) L (2)
Additional comments: Advocacy for victims of discrimination	

Segregation/Integration

Contributing Factors/Barriers to Accessing Opportunities	Prioritization TOTALS LISTED in ()
1. Community opposition/ cultural attitudes regarding ability, race and poverty	H (11) M (3) L (3)
2. Land use and zoning (Example: Use of Sanitary Improvement Districts as a tool for segregation or to reduce affordable housing inclusion)	H (11) M (4) L (2)
3. Access to publically supported housing for the disability community	H (6) M (10) L (1)
Additional comments: Keep residents who are disabled independent and in the community	

RECAP (Racially and/or Ethnically Concentrated Areas of Poverty)

Contributing Factors/Barriers to Accessing Opportunities	Prioritization TOTALS LISTED in ()
1. Lack of private investment	H (9) M (5) L (3)

2. Deteriorated and abandoned properties	H (11) M (3) L (3)
3. Lack of affordable housing in a range of units and sizes	H (14) M (3) L (0)
Additional comments: Safety	

Disproportionate Housing Needs

Contributing Factors/Barriers to Accessing Opportunities	Prioritization TOTALS LISTED in ()
1. Location and type of affordable housing and/or lack of affordable housing in a range of units and sizes	H (9) M (7) L (1)
2. Source of income discrimination (Example: people being denied for housing based on their source of income being disability benefits or section 8 vouchers)	H (8) M (6) L (3)
3. Deteriorated and abandoned properties	H (6) M (7) L (4)
Additional comments: <ul style="list-style-type: none"> • Lack of vouchers • Lack of quality landlords • Environments that are smoke-free, healthy properties 	



Strategies and Solutions

After reviewing the strategies and solutions collected in community meetings and surveys, please provide any additional ideas about how to potentially address the following fair housing issues below.

Bullet points in blue represent attendee comments.

Public Housing

Suggested Strategy or Solution

- Create more areas like the mixed housing on N. 30th St., target low income/high poverty areas where homes are occupied but worn-out and start rehab effort.
- More ADA: ramp, 0 entry shower, be able to pave grab bars and wider doors
- Elect progressive to US congress, so we can better expand supply
- We need a budge or path from public housing to nonpublic housing
- Increase housing stock availability vouchers
- Decrease barriers to being eligible to receive voucher. Ex. People having to provide life story on application just to sit on waitlist forever
- Enactment of a rental property owners registration ordinance: stat of IA, City of LA Vista

Disability and Access

Suggested Strategy or Solution

- This need to be a higher priority. There needs to be more ADA affordable housing. The need is growing everyday
- More inclusion of mental health care illness
- Give tax incentives to landlords, or discontinue building permit fee to landlords, who they are providing accessible improvements
- Transportation is the issue
- Provide incentive to builders to build remodel units that are handicap accessible
- Strengthen of law. Increase funding for law enforcement

Segregation/Integration

Suggested Strategy or Solution

- Keep the disable independent and in the community. Not all disable are elderly
- Better education in public/private school about real Omaha history (include redlining)
- Landlord buying in higher income concentrated areas
- Concentration of all stakeholder to solve problems

RECAP (Racially and/or Ethnically Concentrated Areas of Poverty)

Suggested Strategy or Solution

- Job training, access and outreach job training, connect with churches. Help people get off assistance by providing job training
- Building throughout Omaha
- Incentive to move and employ in these Ares. Charter schools in these areas.
- Provide incentive

Disproportionate Housing Needs

Suggested Strategy or Solution

- Grants for home improvement, possibly for new home owners. Incentive to buy repair homes
- Mandate developer funding of relocation cost upon TIF (or building/demo permit if no TIF). Rent controlling NYC or better. All TIF must include a percentage of affordable housing. Zone for dense, multi-use housing, restrict demo permits for usable houses.
- Offer funding options for those living on SSI
- Need efficiency. 1br, 2br, 3brd options to meet family needs
- Adequate money as incentives. Education is a major factor. Immigrants and refugees need extra assistance w/o being pinned against other minorities

Transportation

Suggested Strategy or Solution

- Push for more support from local gov't entities for increased transportation funding and real transportation solutions (i.e. bus, BRT, not a streetcar)
- Be door to door! Para-transit, expand routes. Don't always use large bus and invest in smaller vans. Don't pick up blind or people who walk with walkers up with large Moby bus/van. Use smaller car. Team up with Cabs or Uber
- Increase transit funding
- Less parking spaces more crowded streets lead to more reliance on public transportation. Make public transportation a choice and alternative not a last chance.
- Omaha2050 is dealing with some of this encouraging more varieties of ideas.

Employment

Suggested Strategy or Solution

- Train people for workforce, and new emerging jobs
- A living wage ordinance. A city lending bank for startups.
- Give employees better incentives and flexibility to be able to use public transportation

- Increase employment opportunities located in city areas that have high unemployment-use TIF
- Raise minimum wage, public work space for unemployed
- Housing stock available to low income residents need to be in all areas of town

Education

Suggested Strategy or Solution

- Job training for the workforce demand in healthcare, trade, and finance(relevant education)
- Ernie chamber 3 district plan
- Charter school-longer school year, increase length of days
- Major factor in all disparities. Major money infusion. Most import part of improvement in all area of concern

Environment

Suggested Strategy or Solution

- Crack down on slum lords and implement policies
- Have a place for the future. Do not react from past mistakes

Access to Low Poverty Neighborhoods

Suggested Strategy or Solution

- Systematically improve streets in the older/ poorer neighborhoods.
- Support churches. Mentor groups, to become non-profit
- Freedom from fear & education

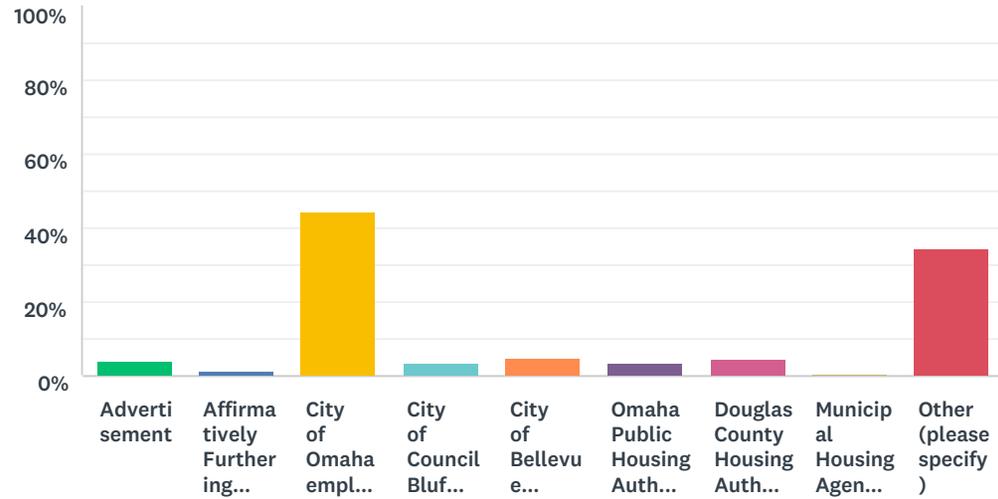
Other

Suggested Strategy or Solution

- Don't be afraid to try things that have been successful in other cities, too many times I hear "that will never work in Omaha." But too few seem to be willing to try and actually find out if a strategy will work or not.
- Put city and regional planning discussion, forum, planning board on the web
- Reach out to the disable community. I.e. meeting they could come to when boy would actually bring them
- Thank you for researching and providing the community with this information. More people need to be at the table.

Q1 How did you hear about this survey?

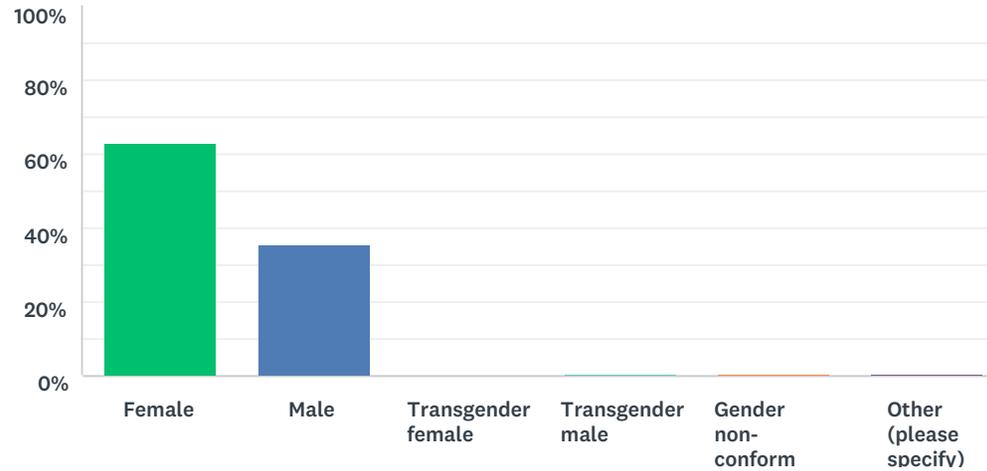
Answered: 1,627 Skipped: 60



ANSWER CHOICES	RESPONSES
Advertisement	3.81% 62
Affirmatively Furthering Fair Housing Website	1.60% 26
City of Omaha employee or department	44.25% 720
City of Council Bluffs employee or department	3.50% 57
City of Bellevue employee or department	4.86% 79
Omaha Public Housing Authority	3.38% 55
Douglas County Housing Authority	4.55% 74
Municipal Housing Agency of Council Bluffs	0.74% 12
Other (please specify)	34.60% 563
Total Respondents: 1,627	

Q2 Gender

Answered: 1,671 Skipped: 16



ANSWER CHOICES	RESPONSES
Female	62.96% 1,052
Male	35.43% 592
Transgender female	0.06% 1
Transgender male	0.42% 7
Gender non-conforming	0.66% 11
Other (please specify)	0.48% 8
TOTAL	1,671

Q3 A. In what zip code do you reside?

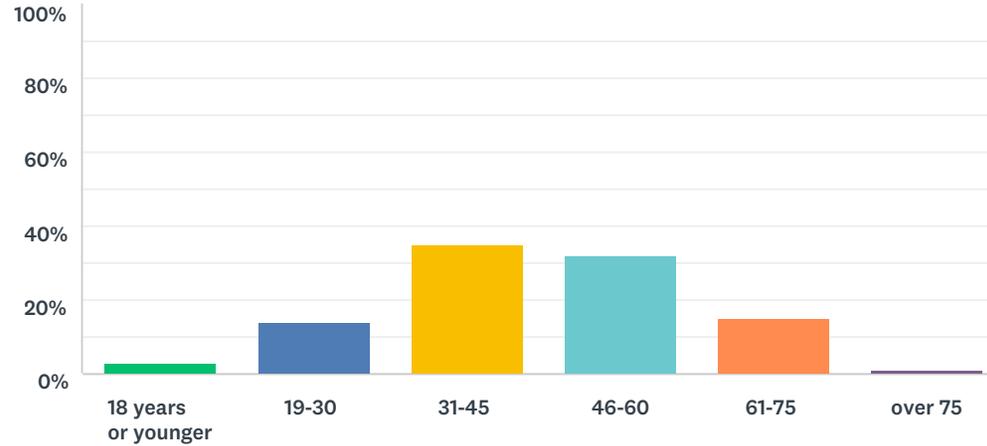
Answered: 1,657 Skipped: 30

Q4 If you know the name of your neighborhood, please list it here.

Answered: 1,083 Skipped: 604

Q5 Please select your current age range

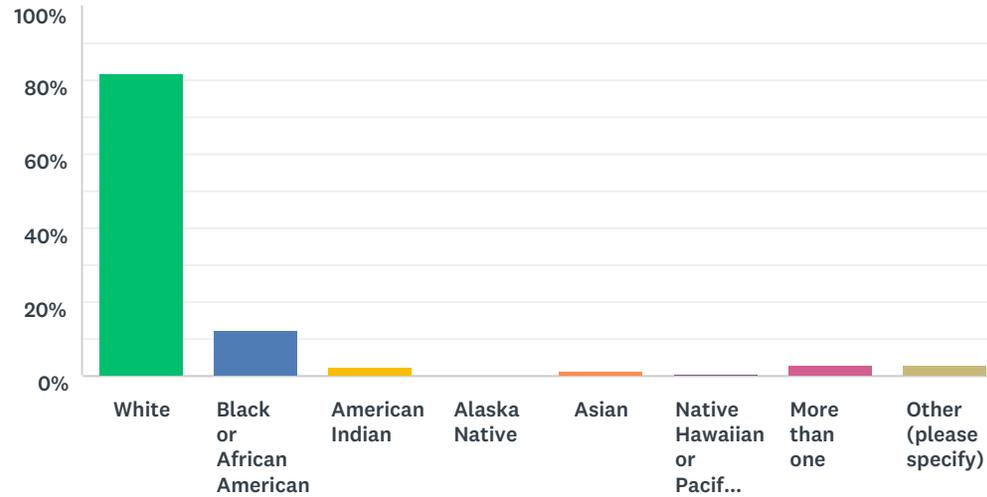
Answered: 1,666 Skipped: 21



ANSWER CHOICES	RESPONSES	
18 years or younger	3.24%	54
19-30	14.05%	234
31-45	34.87%	581
46-60	32.11%	535
61-75	14.77%	246
over 75	0.96%	16
TOTAL		1,666

Q6 What is your race or cultural background? Select all that apply.

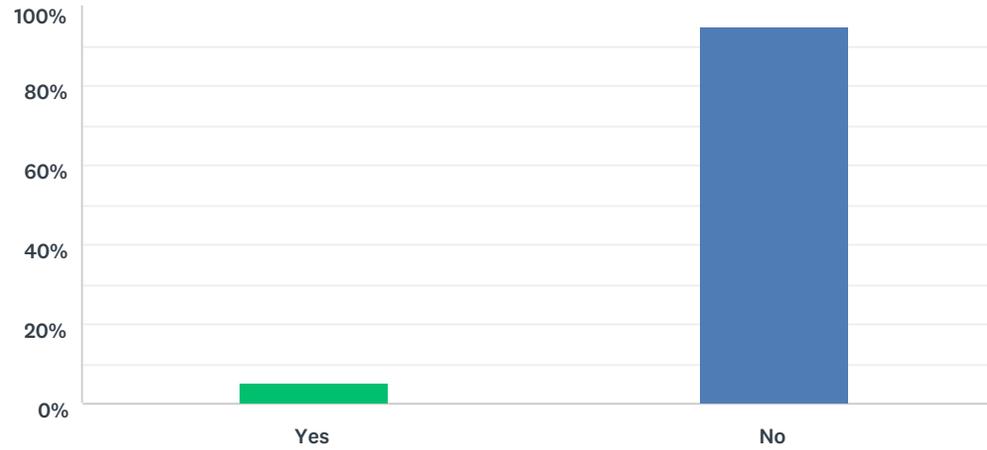
Answered: 1,654 Skipped: 33



ANSWER CHOICES	RESPONSES	
White	82.10%	1,358
Black or African American	12.33%	204
American Indian	2.42%	40
Alaska Native	0.12%	2
Asian	1.69%	28
Native Hawaiian or Pacific Islander	0.30%	5
More than one	3.14%	52
Other (please specify)	3.08%	51
Total Respondents: 1,654		

Q7 Are you Hispanic or Latino?

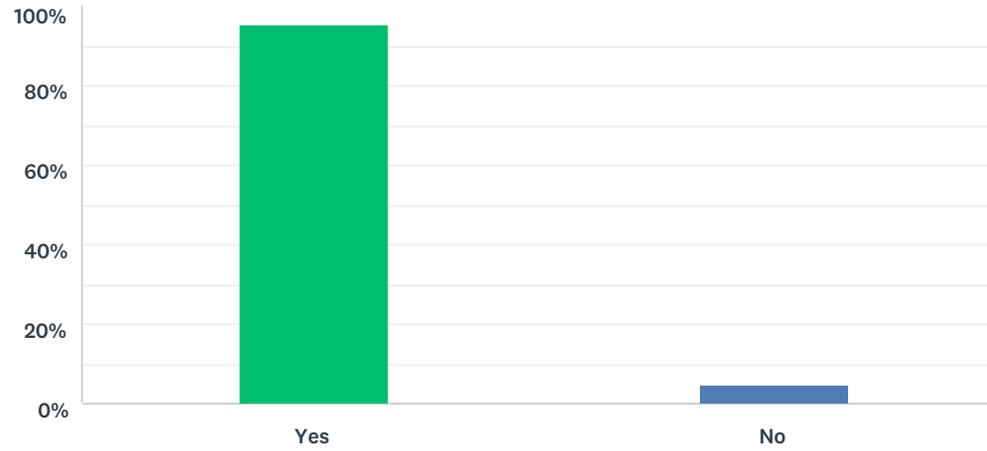
Answered: 1,644 Skipped: 43



ANSWER CHOICES	RESPONSES	
Yes	5.11%	84
No	94.89%	1,560
TOTAL		1,644

Q8 Are you a United States citizen by birth?

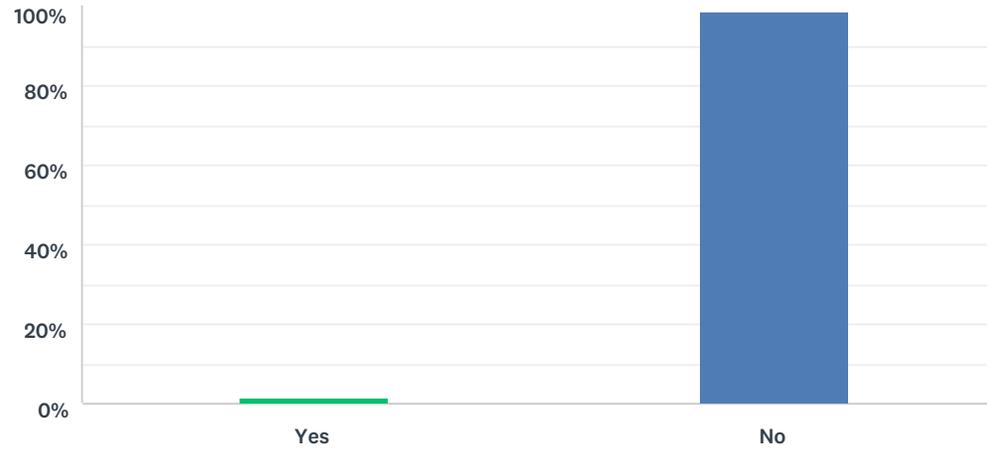
Answered: 1,660 Skipped: 27



ANSWER CHOICES	RESPONSES	
Yes	95.30%	1,582
No	4.70%	78
TOTAL		1,660

Q9 Do you currently have refugee status?

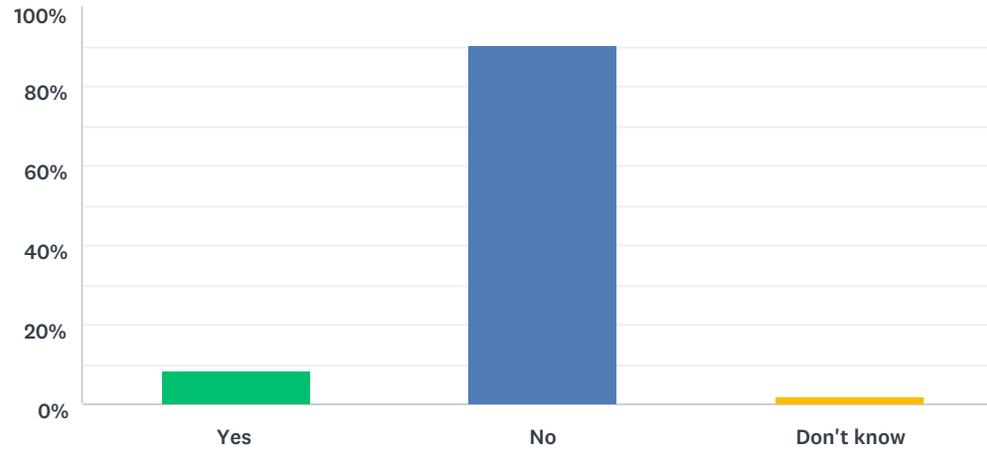
Answered: 1,646 Skipped: 41



ANSWER CHOICES	RESPONSES	
Yes	1.22%	20
No	98.78%	1,626
TOTAL		1,646

Q10 Do you identify as part of the LGBTQ+ (Lesbian, Gay, Bisexual, Transgender, Queer, +) community?

Answered: 1,654 Skipped: 33



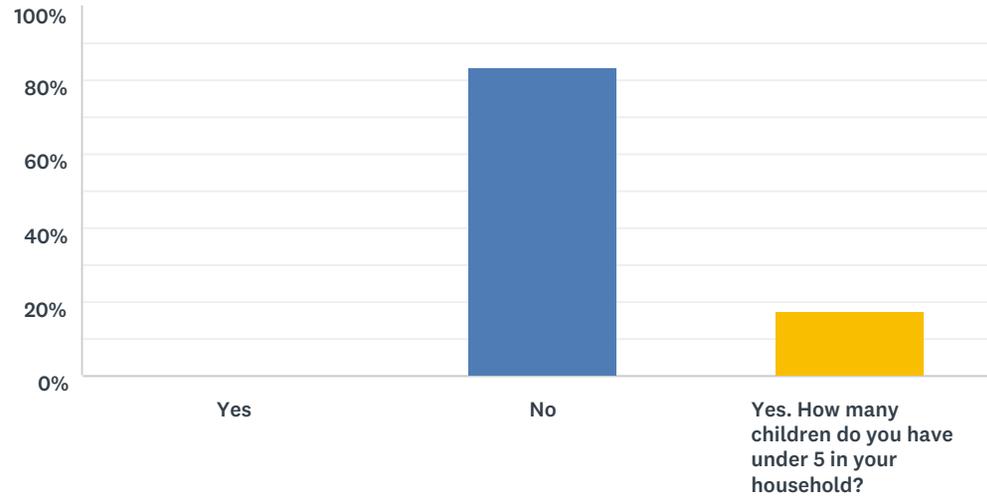
ANSWER CHOICES	RESPONSES	
Yes	8.28%	137
No	90.08%	1,490
Don't know	1.63%	27
TOTAL		1,654

Q11 How many adults (19 years and older) reside in your household?

Answered: 1,586 Skipped: 101

Q12 Do you have children in your household under 5?

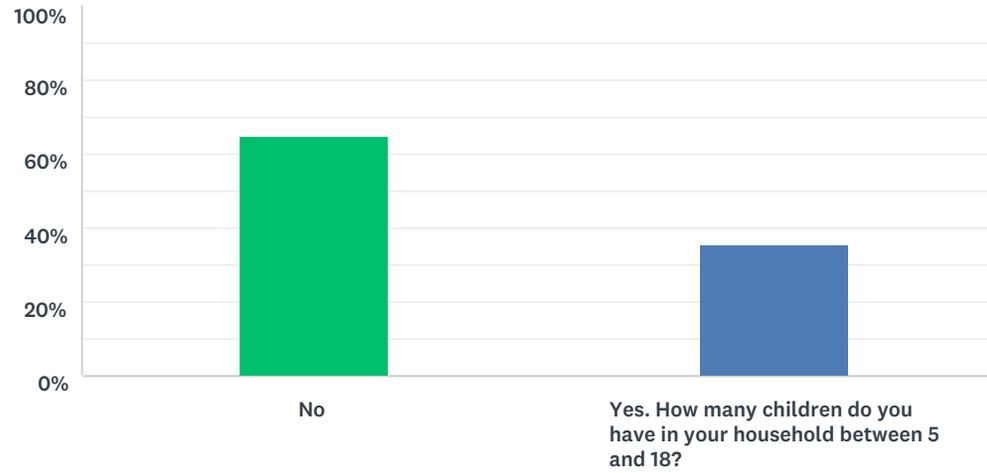
Answered: 1,623 Skipped: 64



ANSWER CHOICES	RESPONSES	
Yes	0.00%	0
No	83.30%	1,352
Yes. How many children do you have under 5 in your household?	17.25%	280
Total Respondents: 1,623		

Q13 Do you have children in your household age 5-18?

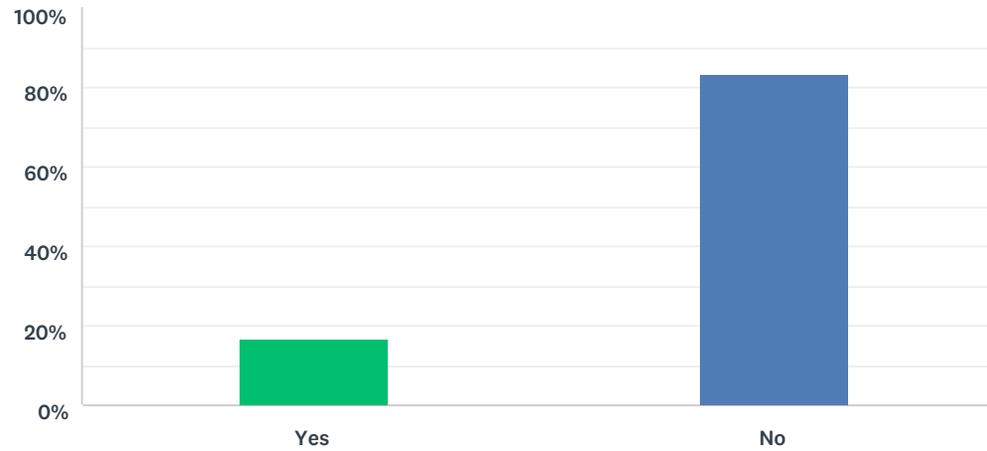
Answered: 1,627 Skipped: 60



ANSWER CHOICES	RESPONSES	
No	64.90%	1,056
Yes. How many children do you have in your household between 5 and 18?	35.34%	575
Total Respondents: 1,627		

Q14 If more than one adult resides in your household, are any adults in your household unrelated by blood or marriage?

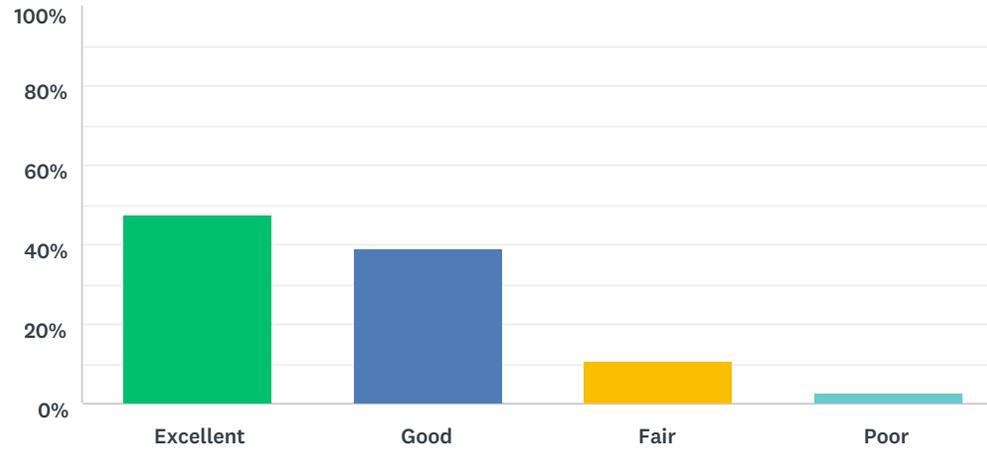
Answered: 1,487 Skipped: 200



ANSWER CHOICES	RESPONSES	
Yes	16.75%	249
No	83.25%	1,238
TOTAL		1,487

Q15 How would you rate the quality of schools that your child attends?

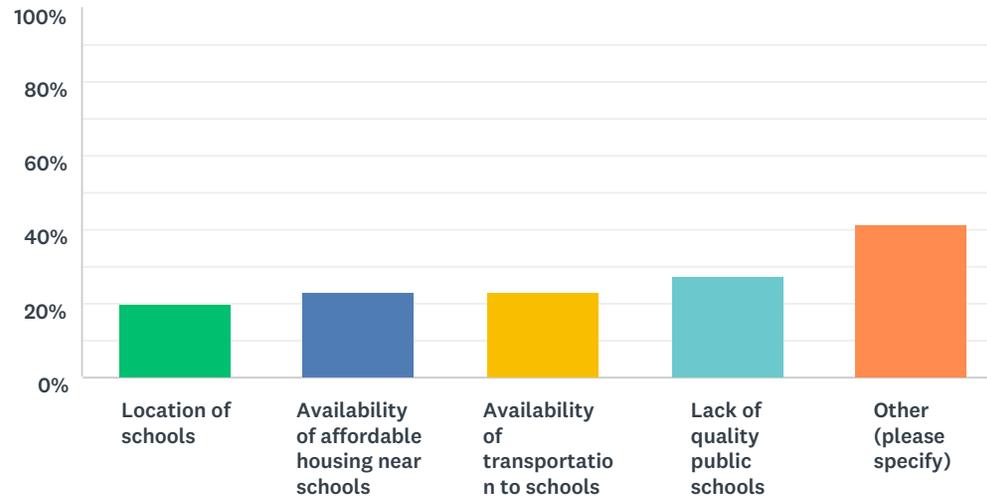
Answered: 597 Skipped: 1,090



ANSWER CHOICES	RESPONSES	
Excellent	47.40%	283
Good	39.20%	234
Fair	10.55%	63
Poor	2.85%	17
TOTAL		597

Q16 What barriers have you experienced to accessing a high quality education for your child? Select all that apply.

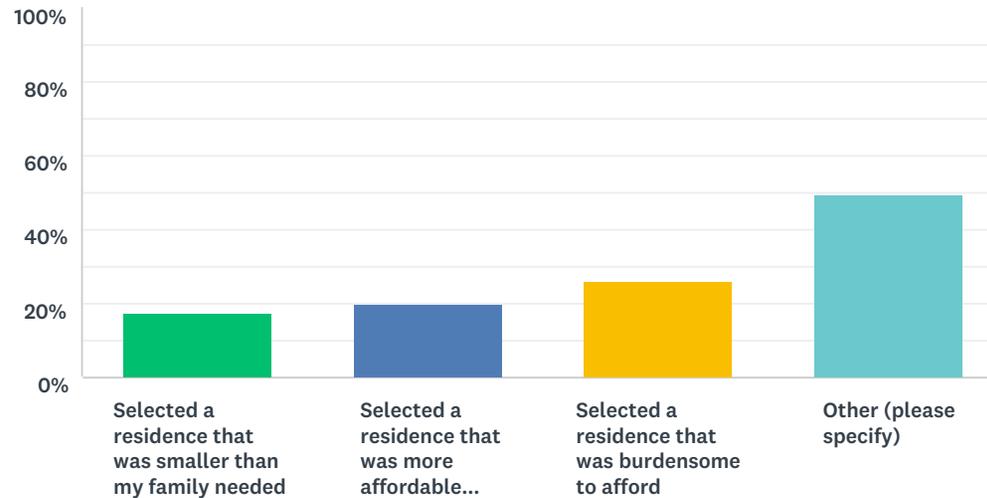
Answered: 460 Skipped: 1,227



ANSWER CHOICES	RESPONSES	
Location of schools	20.22%	93
Availability of affordable housing near schools	23.04%	106
Availability of transportation to schools	22.83%	105
Lack of quality public schools	27.39%	126
Other (please specify)	41.74%	192
Total Respondents: 460		

Q17 In the last 5 years, have you made any of the following choices when seeking housing to ensure that your child could attend a high-quality school? Select all that apply.

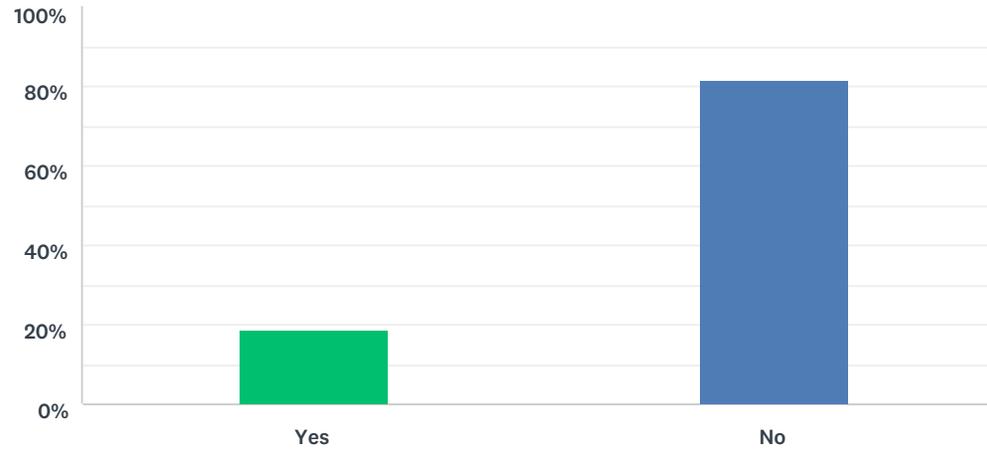
Answered: 373 Skipped: 1,314



ANSWER CHOICES	RESPONSES	
Selected a residence that was smaller than my family needed	17.43%	65
Selected a residence that was more affordable because it needed significant repairs	20.11%	75
Selected a residence that was burdensome to afford	26.01%	97
Other (please specify)	49.33%	184
Total Respondents: 373		

Q18 Does any member of your household have a disability of any type-physical, mental, intellectual, or developmental?

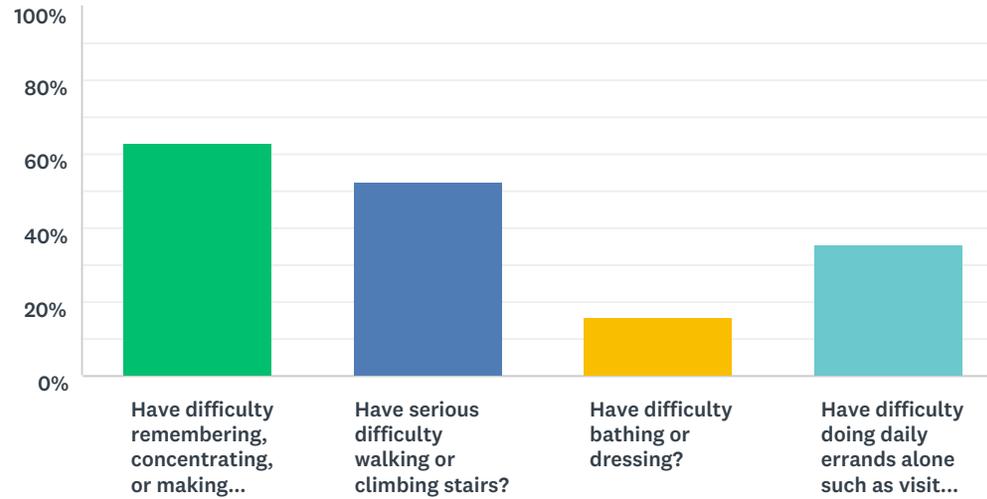
Answered: 1,576 Skipped: 111



ANSWER CHOICES	RESPONSES	
Yes	18.46%	291
No	81.54%	1,285
TOTAL		1,576

Q19 Does any member of your household (check all that apply):

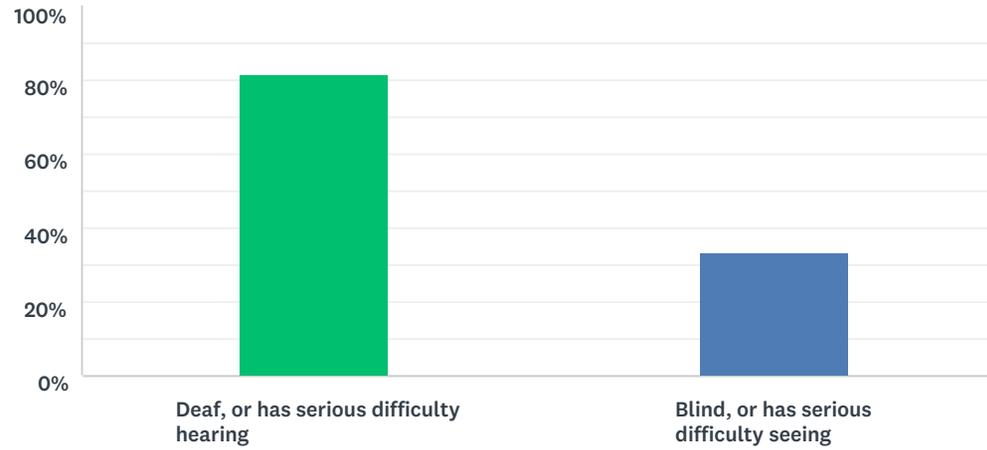
Answered: 196 Skipped: 1,491



ANSWER CHOICES	RESPONSES	
Have difficulty remembering, concentrating, or making decisions because of physical, mental, or emotional problems	62.76%	123
Have serious difficulty walking or climbing stairs?	52.55%	103
Have difficulty bathing or dressing?	15.82%	31
Have difficulty doing daily errands alone such as visiting a doctor's office or shopping because of a physical, mental, or emotional problem	35.71%	70
Total Respondents: 196		

Q20 Is anyone in your household (Check all that apply):

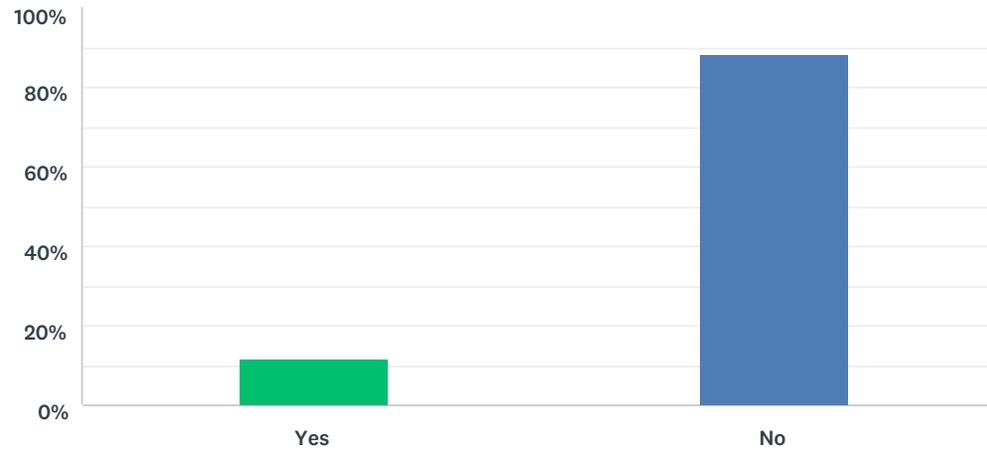
Answered: 27 Skipped: 1,660



ANSWER CHOICES	RESPONSES	
Deaf, or has serious difficulty hearing	81.48%	22
Blind, or has serious difficulty seeing	33.33%	9
Total Respondents: 27		

Q21 If you have or a member of your household has serious difficulty walking or climbing stairs, do you require the use of wheelchair daily?

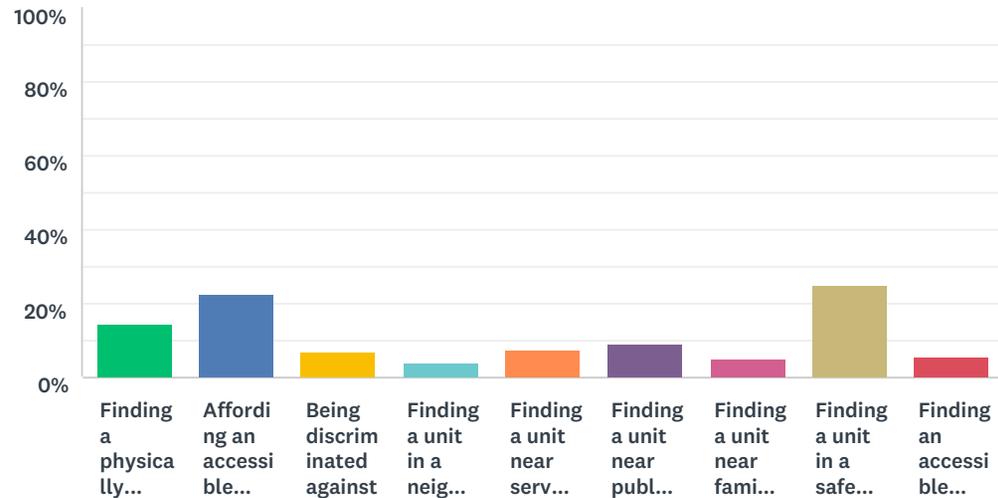
Answered: 210 Skipped: 1,477



ANSWER CHOICES	RESPONSES	
Yes	11.43%	24
No	88.57%	186
TOTAL		210

Q22 In your experience, which of the following issues have presented challenges to you when looking for housing? Select all that apply.

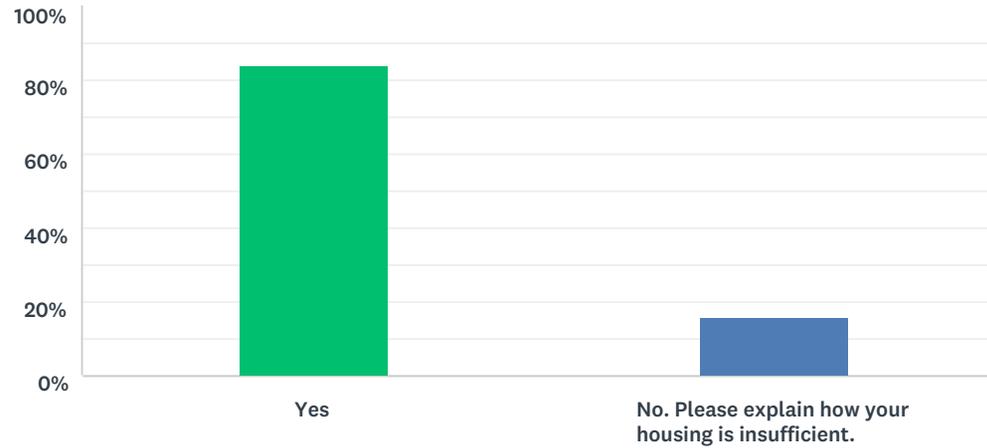
Answered: 159 Skipped: 1,528



ANSWER CHOICES	RESPONSES	
Finding a physically accessible unit	14.47%	23
Affording an accessible unit	22.64%	36
Being discriminated against	6.92%	11
Finding a unit in a neighborhood with accessible sidewalks and infrastructure	3.77%	6
Finding a unit near services and amenities	7.55%	12
Finding a unit near public transit	8.81%	14
Finding a unit near family and friends	5.03%	8
Finding a unit in a safe neighborhood	25.16%	40
Finding an accessible unit that is large enough to accommodate my family	5.66%	9
TOTAL		159

Q23 Does your current housing meet your accessibility needs?

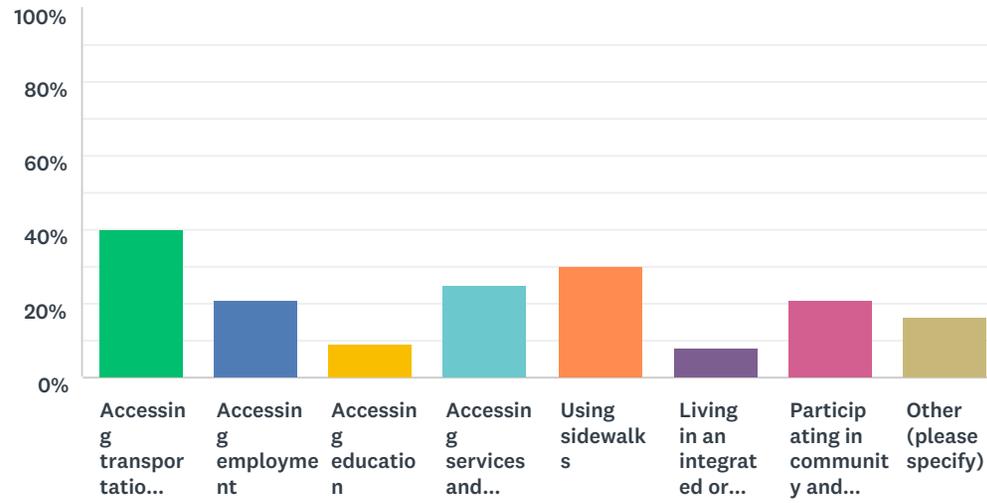
Answered: 260 Skipped: 1,427



ANSWER CHOICES	RESPONSES	
Yes	84.23%	219
No. Please explain how your housing is insufficient.	15.77%	41
Total Respondents: 260		

Q24 Where you currently live, do you experience difficulty with any of the following? Select all that apply.

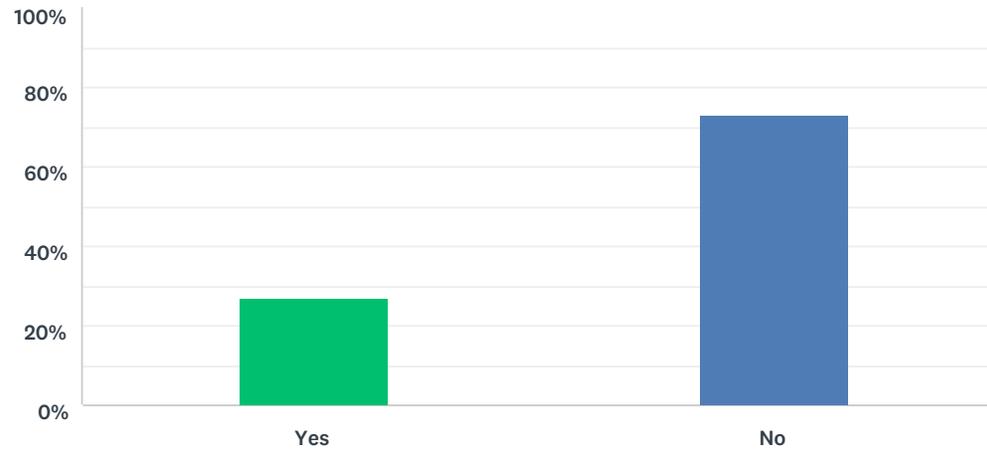
Answered: 123 Skipped: 1,564



ANSWER CHOICES	RESPONSES	
Accessing transportation (personal or public transit)	39.84%	49
Accessing employment	21.14%	26
Accessing education	8.94%	11
Accessing services and amenities	25.20%	31
Using sidewalks	30.08%	37
Living in an integrated or independent setting	8.13%	10
Participating in community and civic activities	21.14%	26
Other (please specify)	16.26%	20
Total Respondents: 123		

Q25 In the past 5 years, have you modified or needed to modify your housing to accommodate your disability?

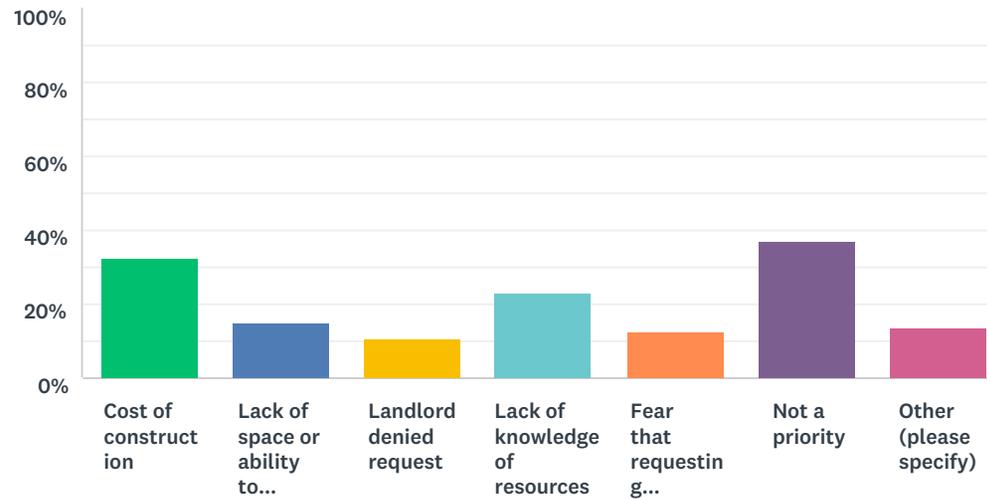
Answered: 260 Skipped: 1,427



ANSWER CHOICES	RESPONSES	
Yes	26.92%	70
No	73.08%	190
TOTAL		260

**Q26 If you have needed to modify your housing to accommodate your disability, what barriers have you experienced when attempting to modify your housing to accommodate your disability?
Select all that apply.**

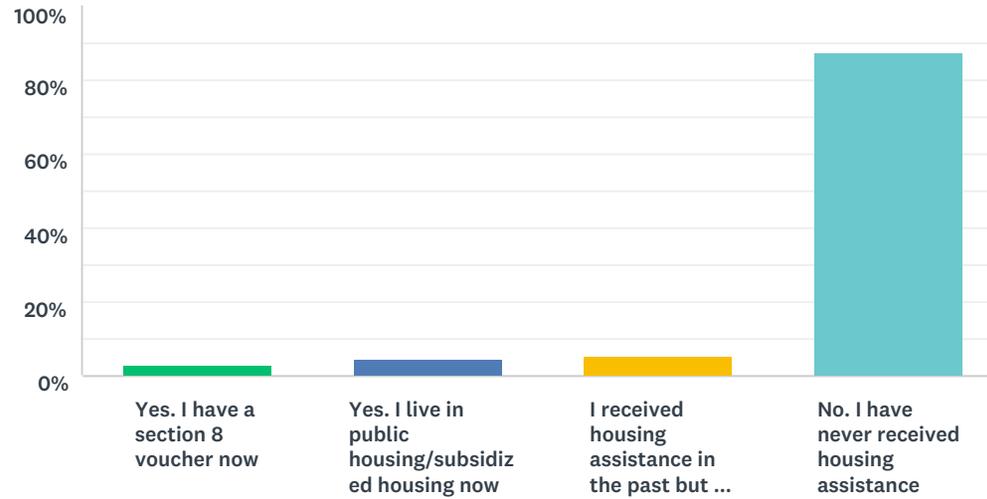
Answered: 113 Skipped: 1,574



ANSWER CHOICES	RESPONSES	
Cost of construction	32.74%	37
Lack of space or ability to construct necessary accommodations	15.04%	17
Landlord denied request	10.62%	12
Lack of knowledge of resources	23.01%	26
Fear that requesting accommodations could jeopardize housing stability	12.39%	14
Not a priority	37.17%	42
Other (please specify)	13.27%	15
Total Respondents: 113		

Q27 Have you ever received housing assistance?

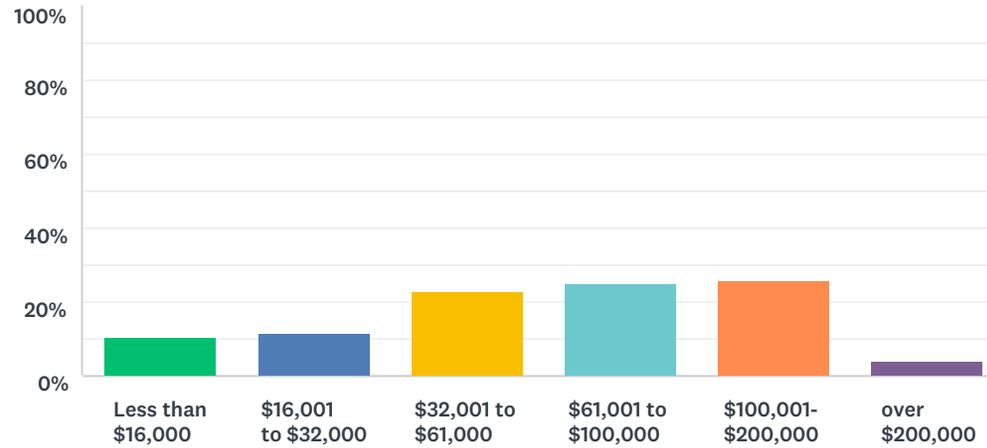
Answered: 1,520 Skipped: 167



ANSWER CHOICES	RESPONSES	
Yes. I have a section 8 voucher now	2.83%	43
Yes. I live in public housing/subsidized housing now	4.41%	67
I received housing assistance in the past but I do not receive housing assistance now	5.39%	82
No. I have never received housing assistance	87.37%	1,328
TOTAL		1,520

Q28 Please select your annual household income range.

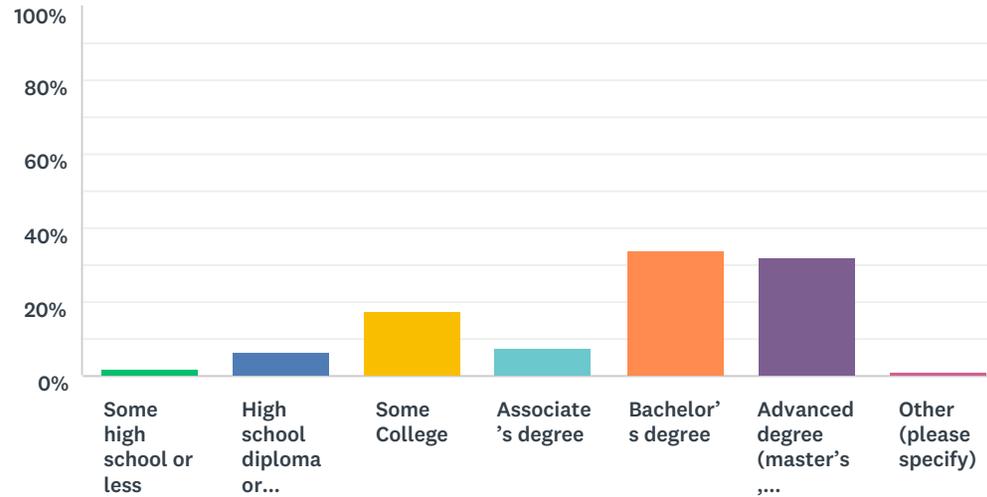
Answered: 1,537 Skipped: 150



ANSWER CHOICES	RESPONSES	
Less than \$16,000	10.28%	158
\$16,001 to \$32,000	11.71%	180
\$32,001 to \$61,000	22.97%	353
\$61,001 to \$100,000	24.98%	384
\$100,001- \$200,000	25.83%	397
over \$200,000	4.23%	65
TOTAL		1,537

Q29 What is the highest level of education achieved by persons in your household?

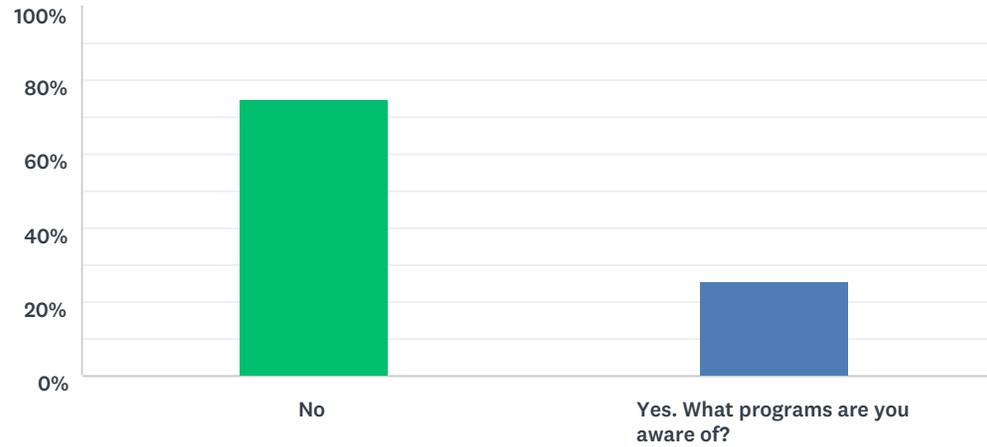
Answered: 1,555 Skipped: 132



ANSWER CHOICES	RESPONSES	
Some high school or less	2.12%	33
High school diploma or equivalent (GED)	6.30%	98
Some College	17.56%	273
Associate's degree	7.40%	115
Bachelor's degree	33.95%	528
Advanced degree (master's, professional, or doctorate degree)	31.90%	496
Other (please specify)	0.77%	12
TOTAL		1,555

Q30 Are you aware of programs that could provide you with assistance in purchasing a home?

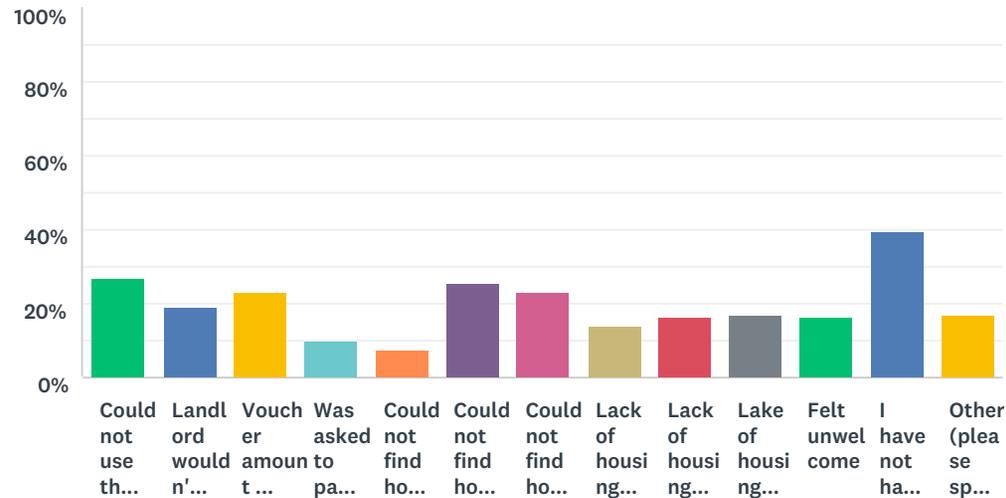
Answered: 180 Skipped: 1,507



ANSWER CHOICES	RESPONSES	
No	75.00%	135
Yes. What programs are you aware of?	25.56%	46
Total Respondents: 180		

Q31 If you have had difficulty using a housing choice voucher, which of the following challenges have you faced? Select all that apply.

Answered: 122 Skipped: 1,565



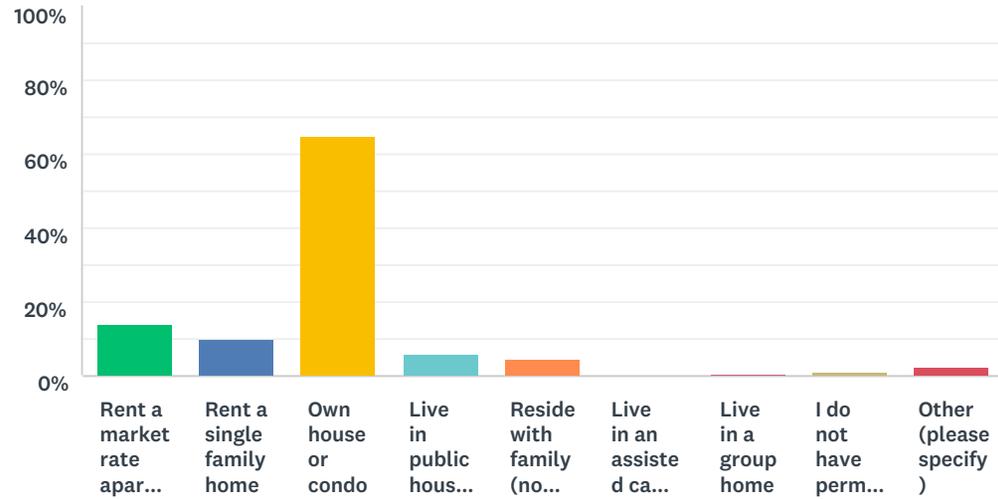
ANSWER CHOICES	RESPONSES
Could not use the voucher in the neighborhood in which I wanted to live	27.05% 33
Landlord wouldn't accept voucher	18.85% 23
Voucher amount was not sufficient to cover the cost of housing	22.95% 28
Was asked to pay more rent if used the voucher	9.84% 12
Could not find housing large enough for my family	7.38% 9
Could not find housing in a safe neighborhood	25.41% 31
Could not find housing in good condition	22.95% 28
Lack of housing in areas with employment opportunities	13.93% 17
Lack of housing in areas with access to public transportation	16.39% 20
Lack of housing in areas with access to goods and services (stores, banks, etc.)	17.21% 21

AFFH

Felt unwelcome	16.39%	20
I have not had difficulty using a housing choice voucher	39.34%	48
Other (please specify)	17.21%	21
Total Respondents: 122		

Q32 How would you describe your housing situation? Select all that apply.

Answered: 1,453 Skipped: 234



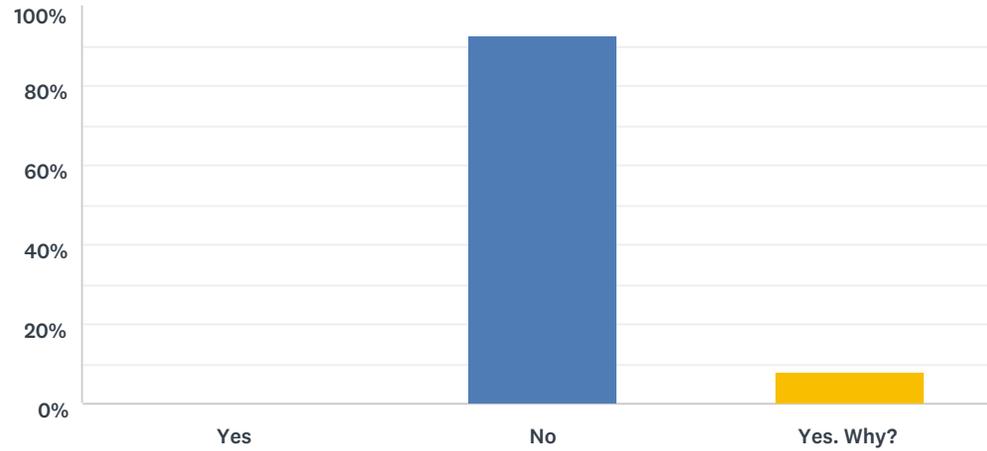
ANSWER CHOICES	RESPONSES	
Rent a market rate apartment	13.83%	201
Rent a single family home	9.84%	143
Own house or condo	65.18%	947
Live in public housing or other subsidized housing, such as housing choice vouchers	6.13%	89
Reside with family (no rent)	4.27%	62
Live in an assisted care facility	0.07%	1
Live in a group home	0.28%	4
I do not have permanent housing at this time	0.89%	13
Other (please specify)	2.27%	33
Total Respondents: 1,453		

Q33 How many times have you looked for a new place to live in the last 5 years?

Answered: 1,312 Skipped: 375

Q34 Have you been denied the opportunity to rent or buy housing in the last 5 years?

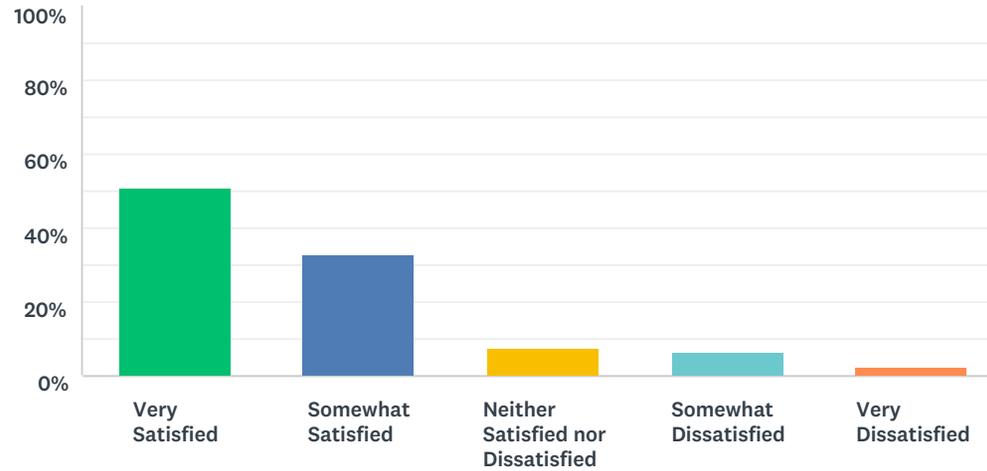
Answered: 1,447 Skipped: 240



ANSWER CHOICES	RESPONSES
Yes	0.14% 2
No	92.33% 1,336
Yes. Why?	7.74% 112
Total Respondents: 1,447	

Q35 How satisfied are you with your current neighborhood?

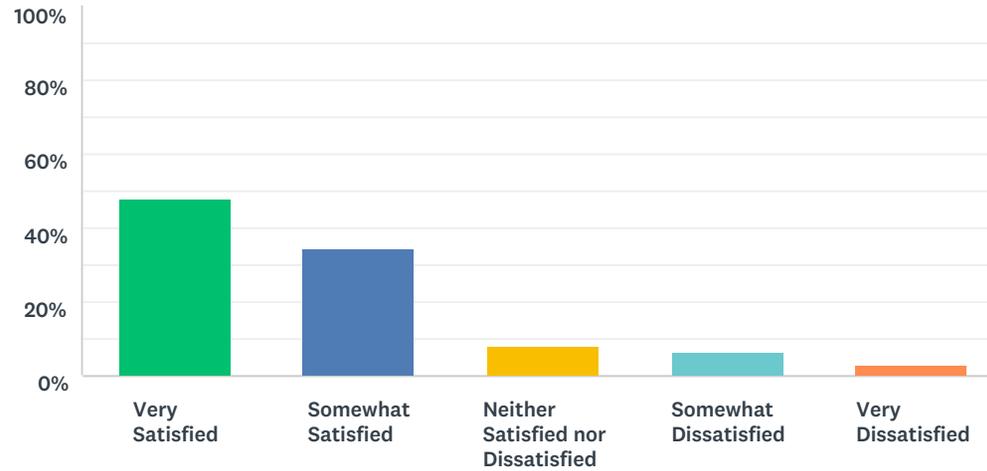
Answered: 1,474 Skipped: 213



ANSWER CHOICES	RESPONSES	
Very Satisfied	51.02%	752
Somewhat Satisfied	32.84%	484
Neither Satisfied nor Dissatisfied	7.46%	110
Somewhat Dissatisfied	6.38%	94
Very Dissatisfied	2.31%	34
TOTAL		1,474

Q36 A. How satisfied are you with your current residence?

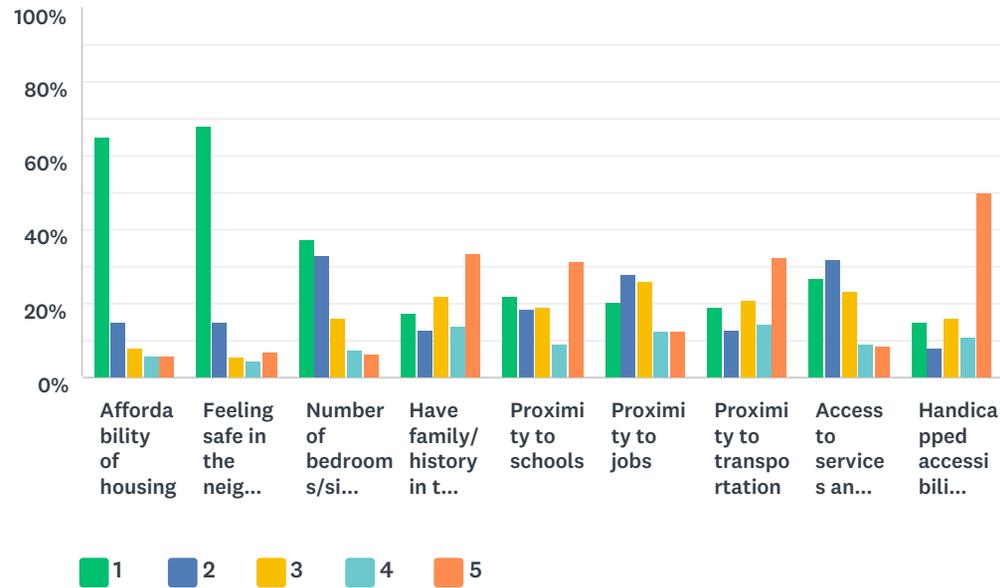
Answered: 1,474 Skipped: 213



ANSWER CHOICES	RESPONSES	
Very Satisfied	48.24%	711
Somewhat Satisfied	34.40%	507
Neither Satisfied nor Dissatisfied	8.01%	118
Somewhat Dissatisfied	6.45%	95
Very Dissatisfied	2.92%	43
TOTAL		1,474

Q37 Please rate the degree to which the following factors influence your choice of residence? (1=very important; 5=not important)

Answered: 1,463 Skipped: 224



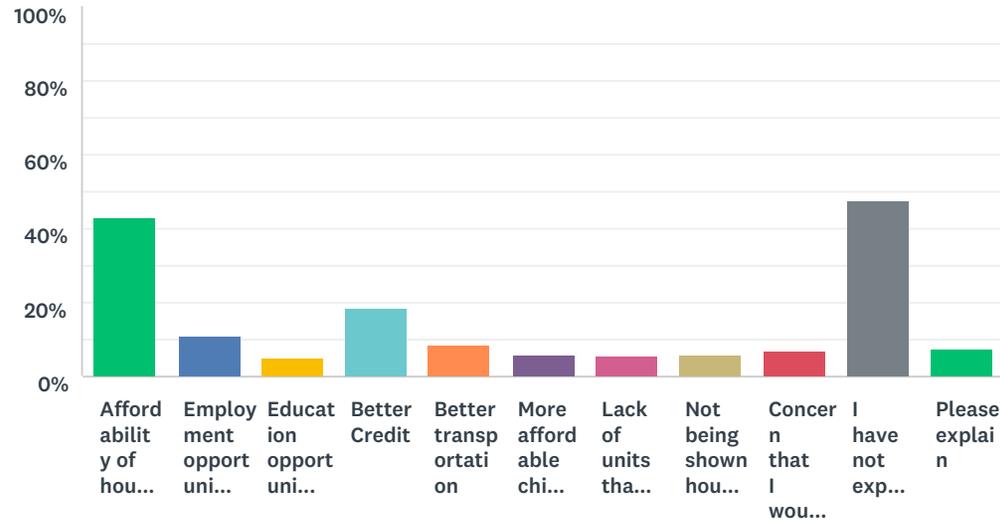
	1	2	3	4	5	TOTAL	WEIGHTED AVERAGE
Affordability of housing	64.84% 937	15.16% 219	8.17% 118	5.81% 84	6.02% 87	1,445	0.00
Feeling safe in the neighborhood	67.82% 984	14.82% 215	5.44% 79	4.69% 68	7.24% 105	1,451	0.00
Number of bedrooms/size of house	37.73% 543	32.94% 474	15.77% 227	7.30% 105	6.25% 90	1,439	0.00
Have family/history in the area	17.50% 249	12.86% 183	21.86% 311	14.05% 200	33.73% 480	1,423	0.00
Proximity to schools	21.97% 312	18.31% 260	19.08% 271	9.01% 128	31.62% 449	1,420	0.00

AFFH

Proximity to jobs	20.47% 290	28.09% 398	26.18% 371	12.56% 178	12.70% 180	1,417	0.00
Proximity to transportation	19.21% 272	12.92% 183	20.97% 297	14.48% 205	32.42% 459	1,416	0.00
Access to services and community resources (grocery stores, places of worship, banks, credit union, healthcare)	26.97% 387	31.85% 457	23.69% 340	9.20% 132	8.29% 119	1,435	0.00
Handicapped accessibility features	15.05% 211	8.06% 113	15.76% 221	11.20% 157	49.93% 700	1,402	0.00

Q38 In your experience, do you feel any of the following factors have served as barriers to your ability to access the housing of your choice? Select all that apply. If yes, please explain.

Answered: 1,327 Skipped: 360



ANSWER CHOICES	RESPONSES	
Affordability of housing	43.18%	573
Employment opportunities	10.93%	145
Education opportunities	4.82%	64
Better Credit	18.31%	243
Better transportation	8.59%	114
More affordable childcare	6.03%	80
Lack of units that accommodate specific needs	5.28%	70
Not being shown housing in neighborhood(s) I would like to live in	5.95%	79
Concern that I would not be welcome in a particular neighborhood	6.86%	91
I have not experienced any of these barriers	47.32%	628

Please explain

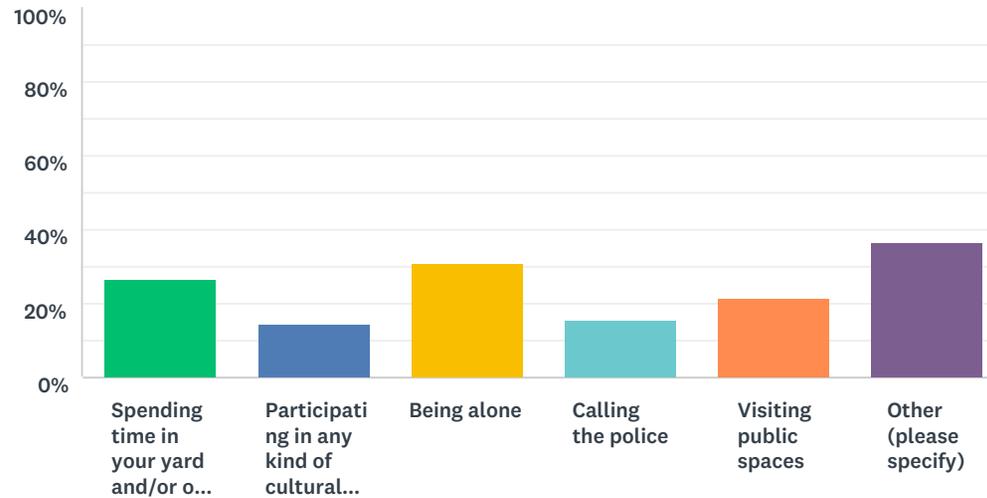
7.31%

97

Total Respondents: 1,327

Q39 While in your neighborhood, do you more than occasionally feel uncomfortable and/or unsafe in any of the following situations? Select all that apply.

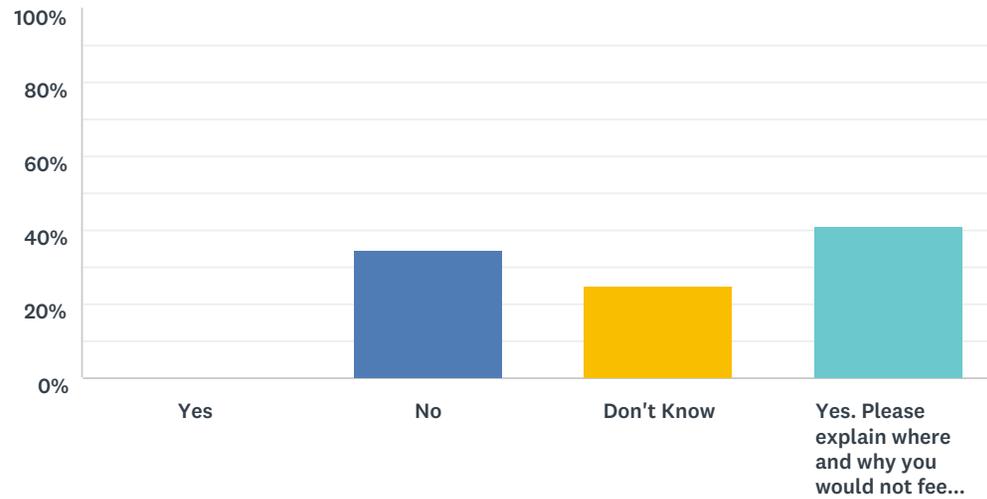
Answered: 529 Skipped: 1,158



ANSWER CHOICES	RESPONSES	
Spending time in your yard and/or on your porch	26.47%	140
Participating in any kind of cultural expression	14.37%	76
Being alone	30.81%	163
Calling the police	15.31%	81
Visiting public spaces	21.55%	114
Other (please specify)	36.29%	192
Total Respondents: 529		

Q40 Are there certain neighborhoods or cities in the Omaha/Council Bluffs region where you would not feel comfortable living because of your race, ethnicity, color, religion, sexual orientation, gender identity, disability, criminal background, national origin, or family status?

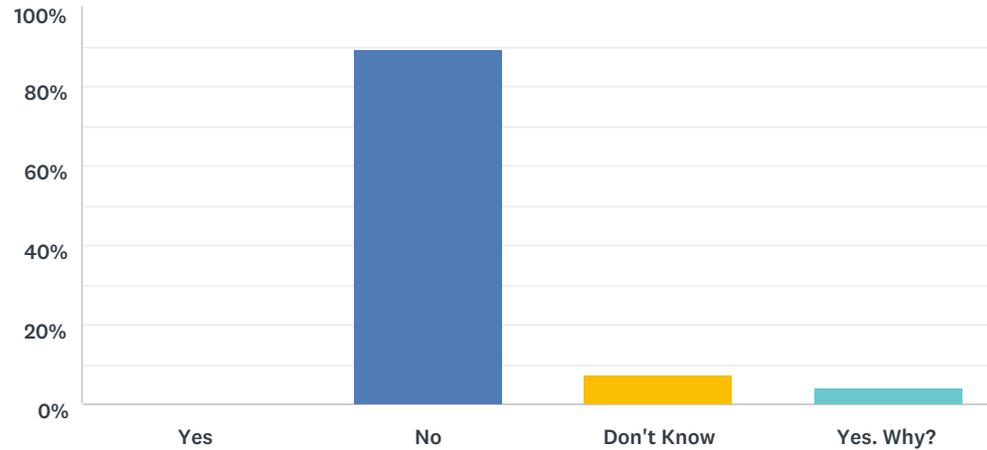
Answered: 1,423 Skipped: 264



ANSWER CHOICES	RESPONSES	
Yes	0.21%	3
No	34.65%	493
Don't Know	24.95%	355
Yes. Please explain where and why you would not feel comfortable.	41.18%	586
Total Respondents: 1,423		

Q41 In the last 5 years, have you experienced discrimination when trying to buy or rent housing?

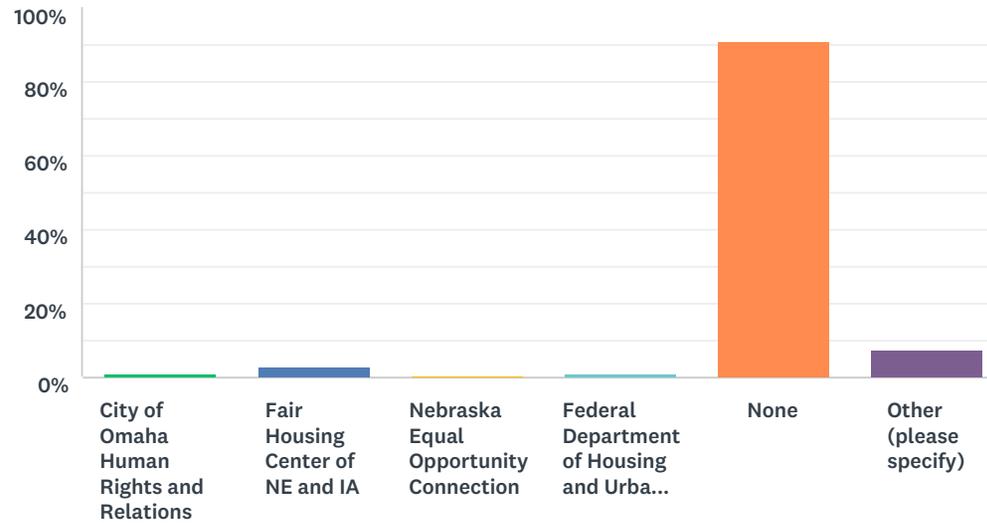
Answered: 1,427 Skipped: 260



ANSWER CHOICES	RESPONSES	
Yes	0.00%	0
No	89.21%	1,273
Don't Know	7.50%	107
Yes. Why?	3.99%	57
Total Respondents: 1,427		

Q42 If you responded yes to the previous question, did you contact any of the agencies below to report discrimination? Select all that apply

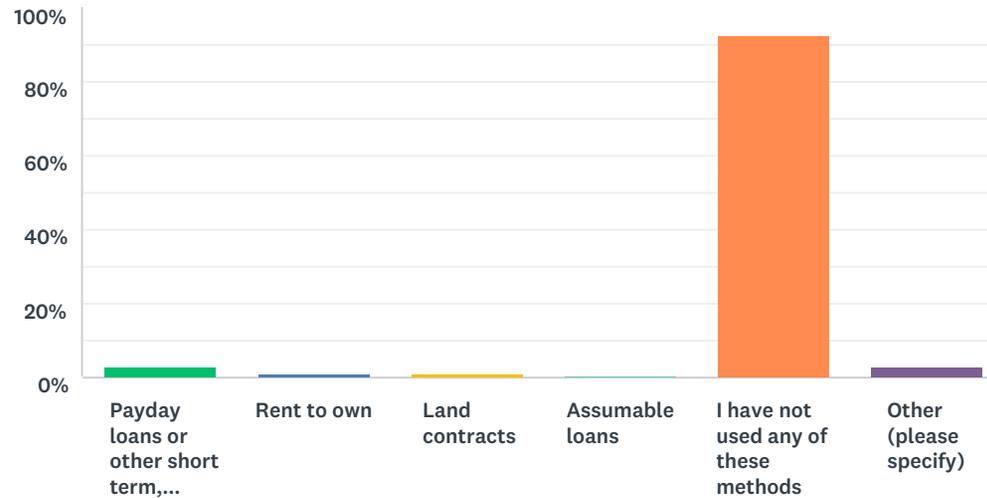
Answered: 427 Skipped: 1,260



ANSWER CHOICES	RESPONSES	
City of Omaha Human Rights and Relations	0.94%	4
Fair Housing Center of NE and IA	2.81%	12
Nebraska Equal Opportunity Connection	0.70%	3
Federal Department of Housing and Urban Development (HUD)	0.94%	4
None	91.10%	389
Other (please specify)	7.26%	31
Total Respondents: 427		

Q43 In the last five years, have you applied for or taken out a loan through any methods other than a bank or credit union in order to obtain housing?

Answered: 1,201 Skipped: 486



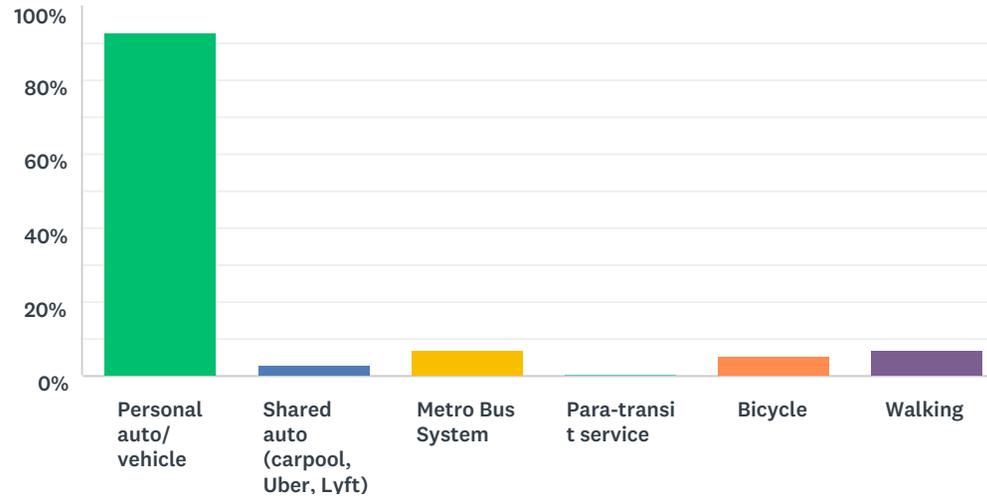
ANSWER CHOICES	RESPONSES	
Payday loans or other short term, high-rate loans	2.91%	35
Rent to own	1.25%	15
Land contracts	0.83%	10
Assumable loans	0.42%	5
I have not used any of these methods	92.51%	1,111
Other (please specify)	3.16%	38
Total Respondents: 1,201		

Q44 If you have applied for or taken out a loan for housing from someone other than a bank, why did you pick that option? What was your experience?

Answered: 131 Skipped: 1,556

Q45 How do you travel to work? Please check all that apply.

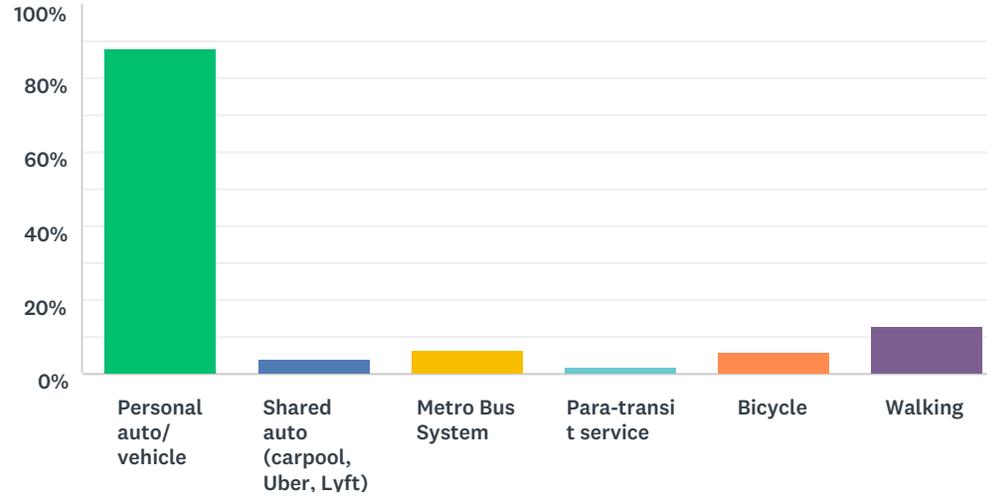
Answered: 1,354 Skipped: 333



ANSWER CHOICES	RESPONSES	
Personal auto/ vehicle	92.98%	1,259
Shared auto (carpool, Uber, Lyft)	3.25%	44
Metro Bus System	6.87%	93
Para-transit service	0.59%	8
Bicycle	5.39%	73
Walking	7.09%	96
Total Respondents: 1,354		

Q46 How do you travel to school? Please check all that apply.

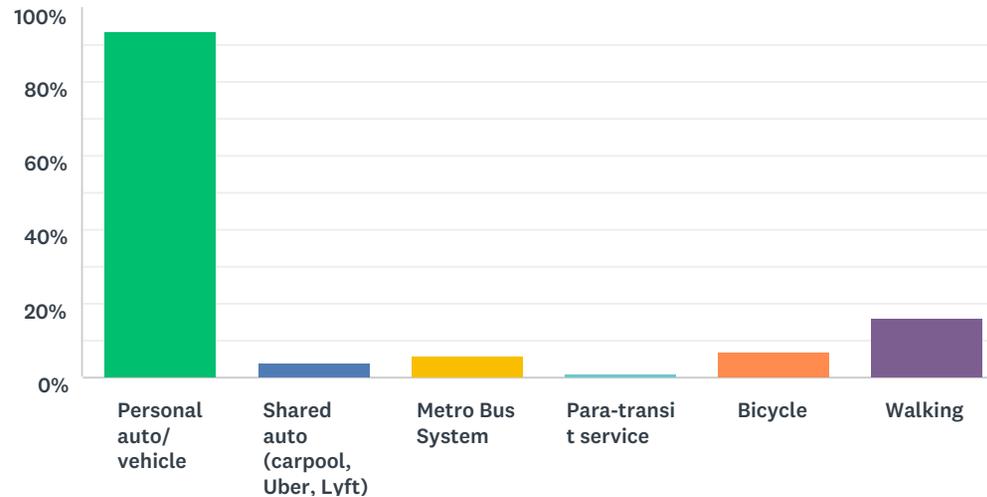
Answered: 791 Skipped: 896



ANSWER CHOICES	RESPONSES	
Personal auto/ vehicle	88.24%	698
Shared auto (carpool, Uber, Lyft)	4.05%	32
Metro Bus System	6.70%	53
Para-transit service	1.77%	14
Bicycle	5.82%	46
Walking	13.02%	103
Total Respondents: 791		

Q47 How do you run basic errands/leisure (grocery shopping, doctor, parks, religious activities)? Please check all that apply.

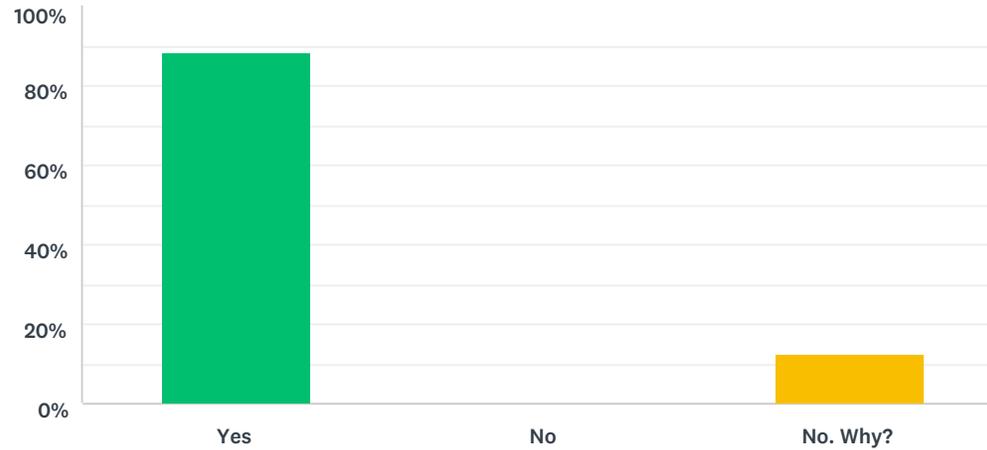
Answered: 1,433 Skipped: 254



ANSWER CHOICES	RESPONSES
Personal auto/ vehicle	93.37% 1,338
Shared auto (carpool, Uber, Lyft)	4.05% 58
Metro Bus System	5.86% 84
Para-transit service	1.19% 17
Bicycle	6.91% 99
Walking	16.19% 232
Total Respondents: 1,433	

Q48 Are you currently using the transportation of your choice?

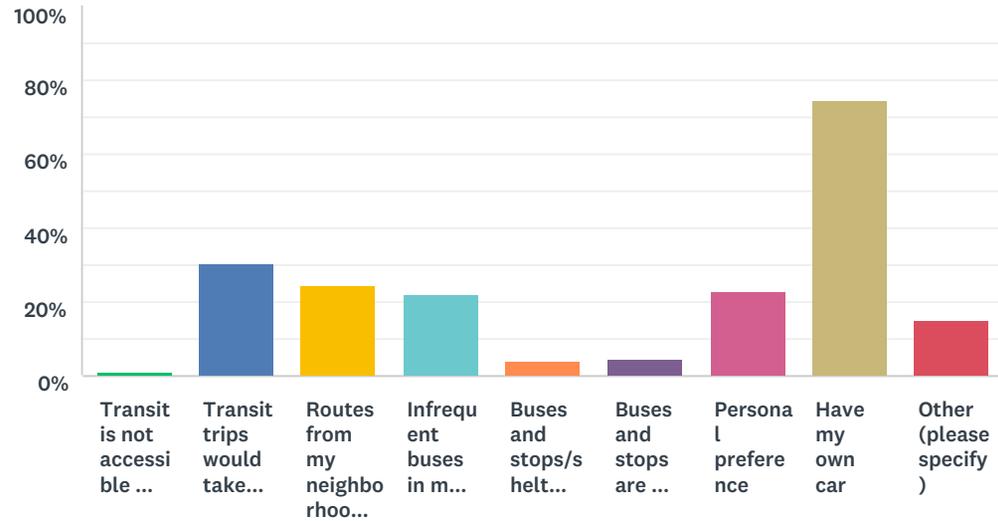
Answered: 1,448 Skipped: 239



ANSWER CHOICES	RESPONSES	
Yes	88.19%	1,277
No	0.21%	3
No. Why?	12.64%	183
Total Respondents: 1,448		

Q49 Why don't you use Metro buses on a regular basis? Check all that apply.

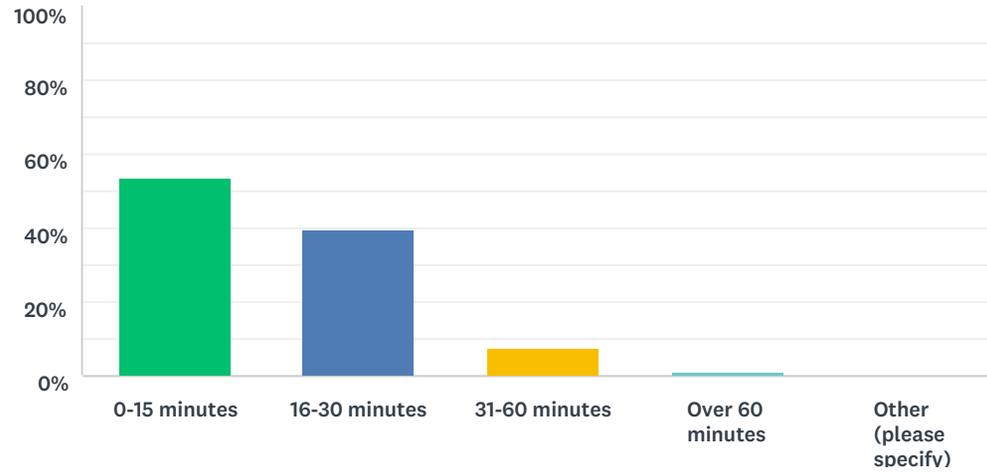
Answered: 1,303 Skipped: 384



ANSWER CHOICES	RESPONSES	
Transit is not accessible for people with disabilities	1.23%	16
Transit trips would take too long from my neighborhood	30.47%	397
Routes from my neighborhood don't service where I need to go	24.71%	322
Infrequent buses in my neighborhood	22.10%	288
Buses and stops/shelters are not safe in my neighborhood	3.99%	52
Buses and stops are not clean in my neighborhood	4.68%	61
Personal preference	22.79%	297
Have my own car	74.52%	971
Other (please specify)	15.20%	198
Total Respondents: 1,303		

Q50 How long does it usually take for you to travel to work?

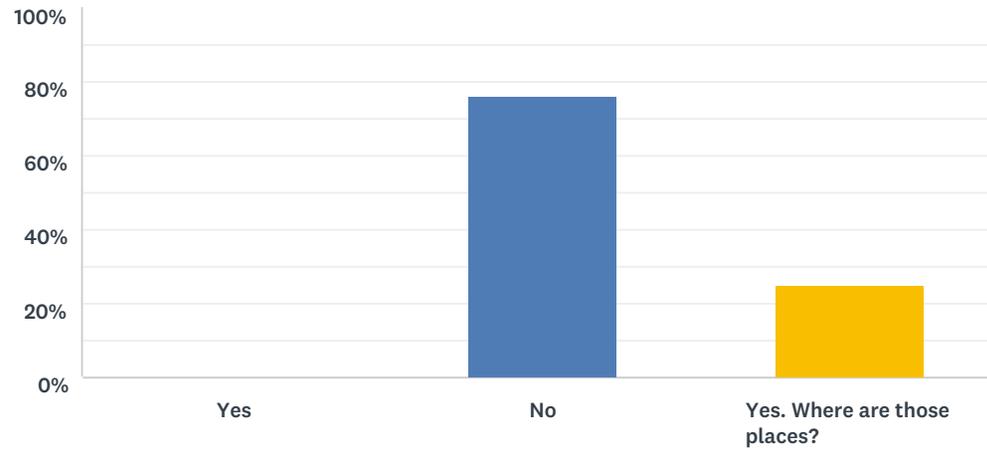
Answered: 1,275 Skipped: 412



ANSWER CHOICES	RESPONSES	
0-15 minutes	53.57%	683
16-30 minutes	39.37%	502
31-60 minutes	7.29%	93
Over 60 minutes	1.10%	14
Other (please specify)	0.00%	0
Total Respondents: 1,275		

Q51 Are there places in the Omaha metro area that you wish you could access by public transportation but cannot?

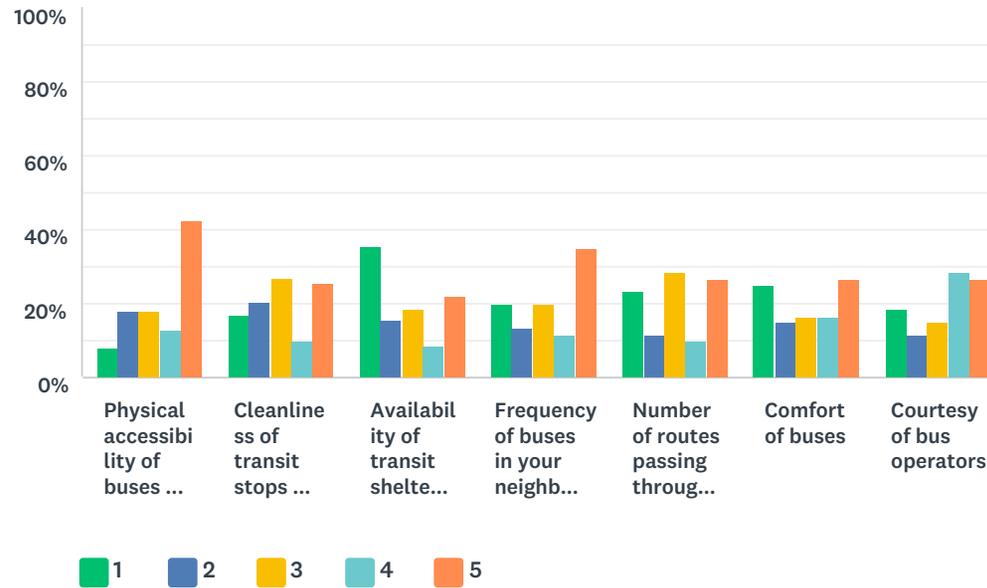
Answered: 1,257 Skipped: 430



ANSWER CHOICES	RESPONSES	
Yes	0.16%	2
No	75.89%	954
Yes. Where are those places?	24.98%	314
Total Respondents: 1,257		

Q52 Please rate the quality of the following transit features of the Metro Bus System on a scale from 1 to 5 (1 = poor; 5 = excellent)

Answered: 61 Skipped: 1,626



	1	2	3	4	5	TOTAL
Physical accessibility of buses and stops	8.20% 5	18.03% 11	18.03% 11	13.11% 8	42.62% 26	61
Cleanliness of transit stops in your neighborhood	16.95% 10	20.34% 12	27.12% 16	10.17% 6	25.42% 15	59
Availability of transit shelters in your neighborhood	35.59% 21	15.25% 9	18.64% 11	8.47% 5	22.03% 13	59
Frequency of buses in your neighborhood	20.00% 12	13.33% 8	20.00% 12	11.67% 7	35.00% 21	60
Number of routes passing through your neighborhood	23.33% 14	11.67% 7	28.33% 17	10.00% 6	26.67% 16	60
Comfort of buses	25.00% 15	15.00% 9	16.67% 10	16.67% 10	26.67% 16	60

AFFH

Courtesy of bus operators

18.33%
11

11.67%
7

15.00%
9

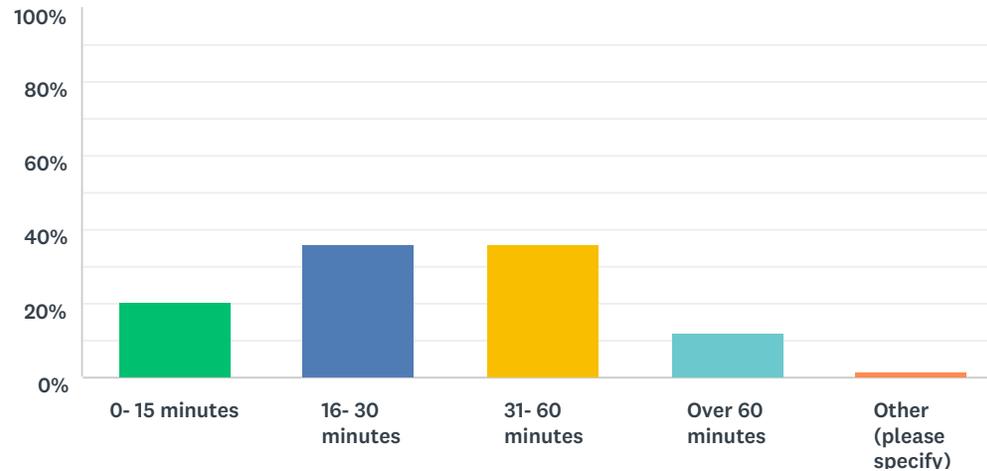
28.33%
17

26.67%
16

60

Q53 On average how long does it take you while using the Metro transit system to get to your typical destinations (work, grocery store, visit family)?

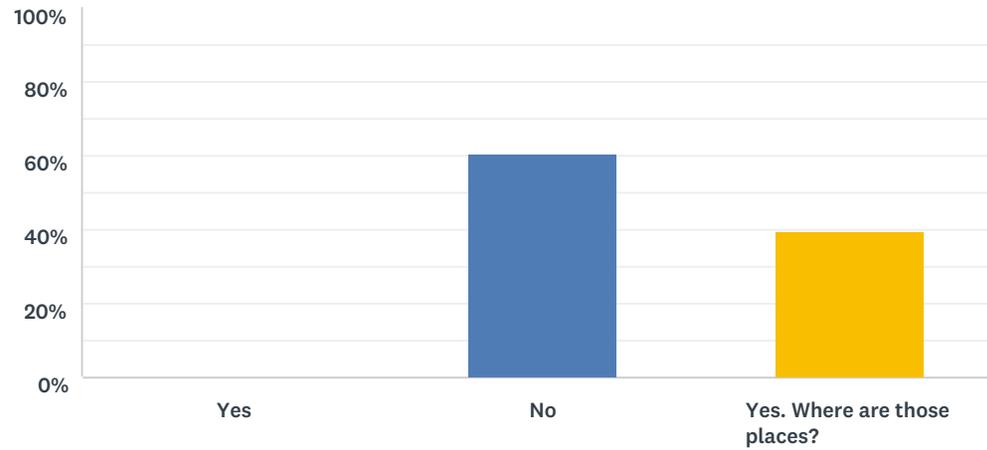
Answered: 58 Skipped: 1,629



ANSWER CHOICES	RESPONSES	
0- 15 minutes	20.69%	12
16- 30 minutes	36.21%	21
31- 60 minutes	36.21%	21
Over 60 minutes	12.07%	7
Other (please specify)	1.72%	1
Total Respondents: 58		

Q54 Are there neighborhoods or specific locations in the Omaha metro area that you wish you could get to by bus but cannot?

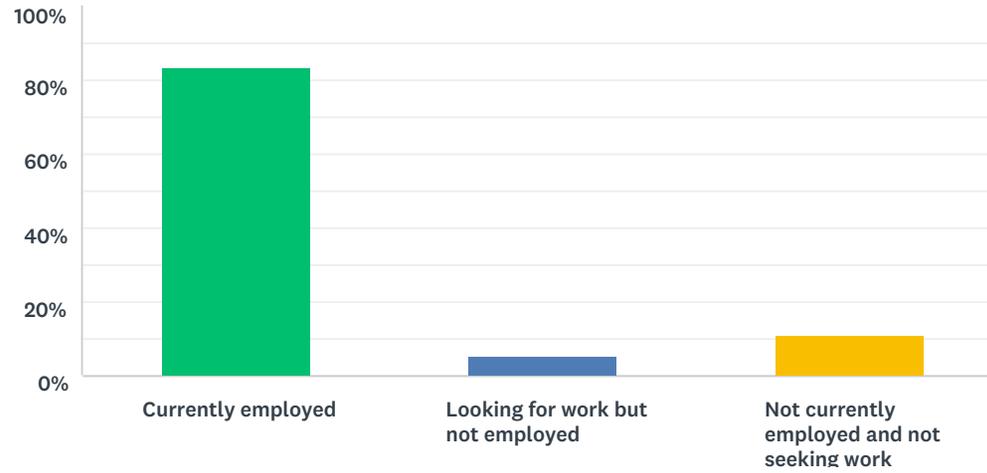
Answered: 63 Skipped: 1,624



ANSWER CHOICES	RESPONSES	
Yes	0.00%	0
No	60.32%	38
Yes. Where are those places?	39.68%	25
TOTAL		63

Q55 What is your employment status?

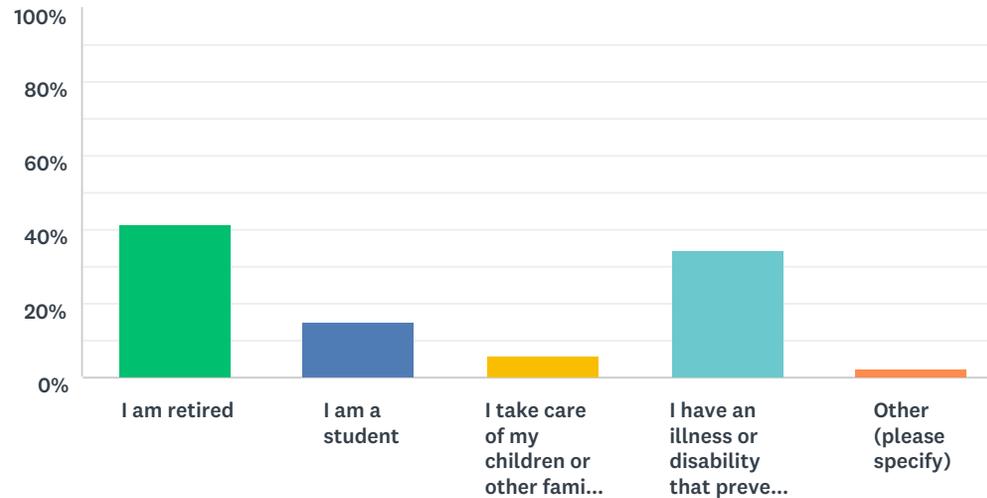
Answered: 1,427 Skipped: 260



ANSWER CHOICES	RESPONSES	
Currently employed	83.67%	1,194
Looking for work but not employed	5.47%	78
Not currently employed and not seeking work	10.86%	155
TOTAL		1,427

Q56 If you are not currently working, which of the following best describes why you are not currently employed and not seeking work?

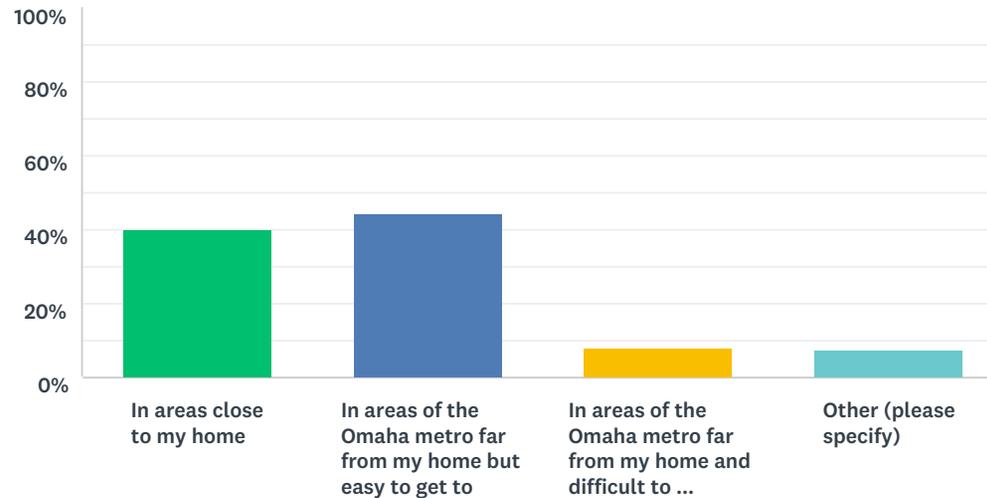
Answered: 147 Skipped: 1,540



ANSWER CHOICES	RESPONSES	
I am retired	41.50%	61
I am a student	14.97%	22
I take care of my children or other family members	6.12%	9
I have an illness or disability that prevents me from working	34.69%	51
Other (please specify)	2.72%	4
TOTAL		147

Q57 Think about the types of jobs you are qualified for based on factors such as your work experience, job skills, and level of education. Where are those jobs typically located?

Answered: 1,331 Skipped: 356



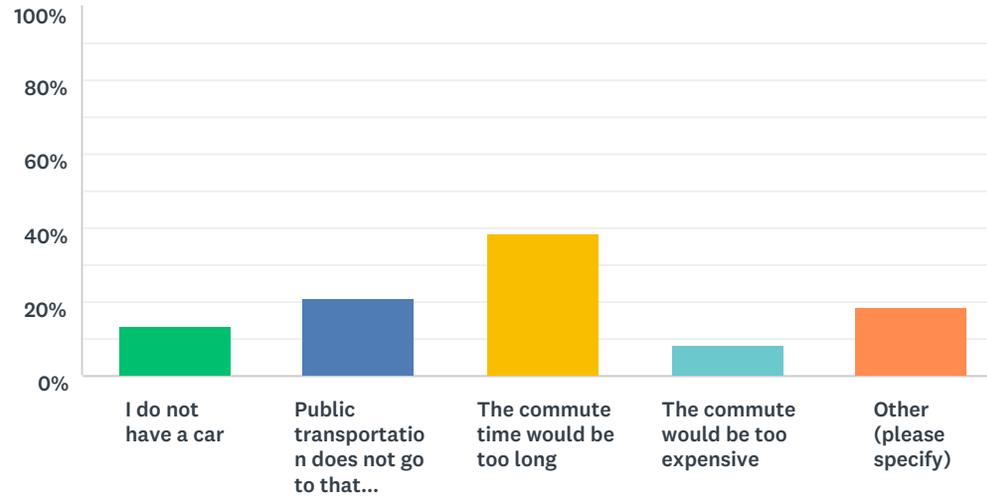
ANSWER CHOICES	RESPONSES	
In areas close to my home	40.12%	534
In areas of the Omaha metro far from my home but easy to get to	44.63%	594
In areas of the Omaha metro far from my home and difficult to get to	7.89%	105
Other (please specify)	7.36%	98
TOTAL		1,331

Q58 Since you responded “In areas of the Omaha metro far from my home and difficult to get to” to the previous question, please identify what area or areas of the Omaha metro you are referring to in regards to jobs that you feel that you are qualified for.

Answered: 92 Skipped: 1,595

Q59 Why is that area(s) difficult to get to? Select all that apply:

Answered: 119 Skipped: 1,568



ANSWER CHOICES	RESPONSES	
I do not have a car	13.45%	16
Public transportation does not go to that area(s)	21.01%	25
The commute time would be too long	38.66%	46
The commute would be too expensive	8.40%	10
Other (please specify)	18.49%	22
TOTAL		119

Q60 Think about the types of jobs you are qualified for based on factors such as your work experience, job skills, and level of education. Are those jobs typically located in areas of the Omaha/Council Bluffs region that are:

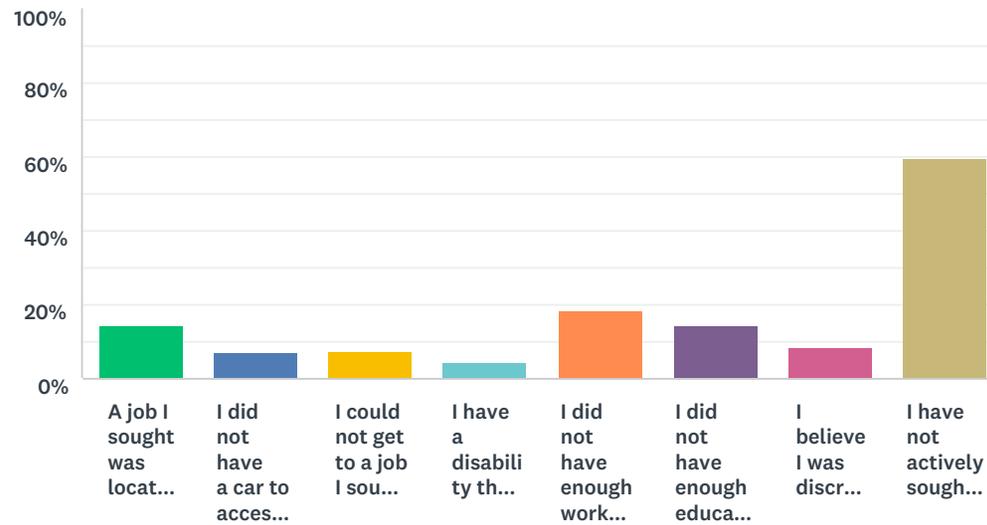
Answered: 1,265 Skipped: 422



ANSWER CHOICES	RESPONSES	
Unaffordable to rent or purchase a home	30.20%	382
Affordable to rent or purchase a home	64.19%	812
Other (please specify)	5.61%	71
TOTAL		1,265

Q61 Think about the types of jobs you are qualified for based on factors such as your work experience, job skills, and level of education. In the past 5 years, when seeking employment in the Omaha/Council Bluffs area, have you experienced any of the following barriers to getting a job you actively sought? Select all that apply.

Answered: 1,016 Skipped: 671

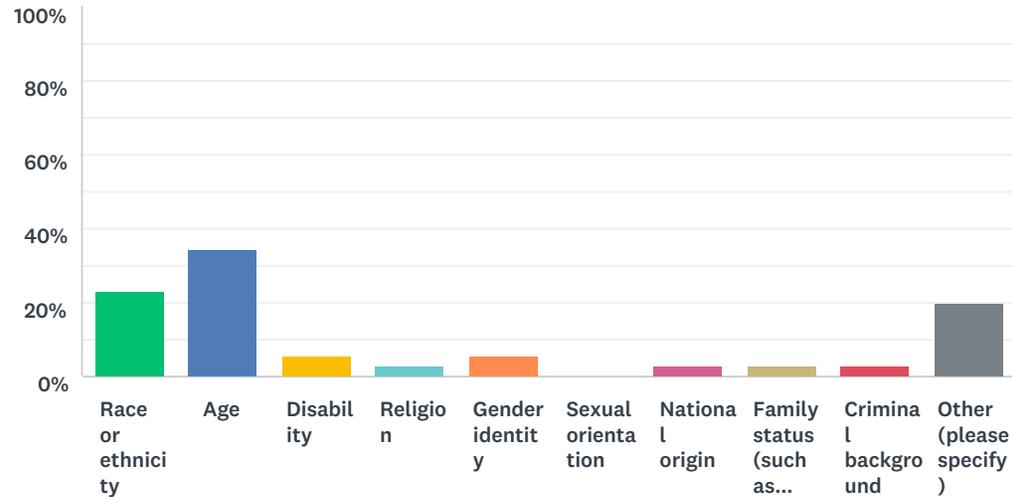


ANSWER CHOICES	RESPONSES	
A job I sought was located too far from where I live	14.67%	149
I did not have a car to access a job I sought	6.79%	69
I could not get to a job I sought using public transportation	7.28%	74
I have a disability that prevented me from taking a job I sought	4.43%	45
I did not have enough work experience to get a job I sought	18.41%	187
I did not have enough education or training to get a job I sought	14.57%	148
I believe I was discriminated against in a job I sought	8.27%	84
I have not actively sought a job in the Omaha area in the past 5 years	59.74%	607

Total Respondents: 1,016

Q62 For those responding “I believe I was discriminated against for a job I sought” do you believe you were discriminated against due to any of the following? Select all that apply.

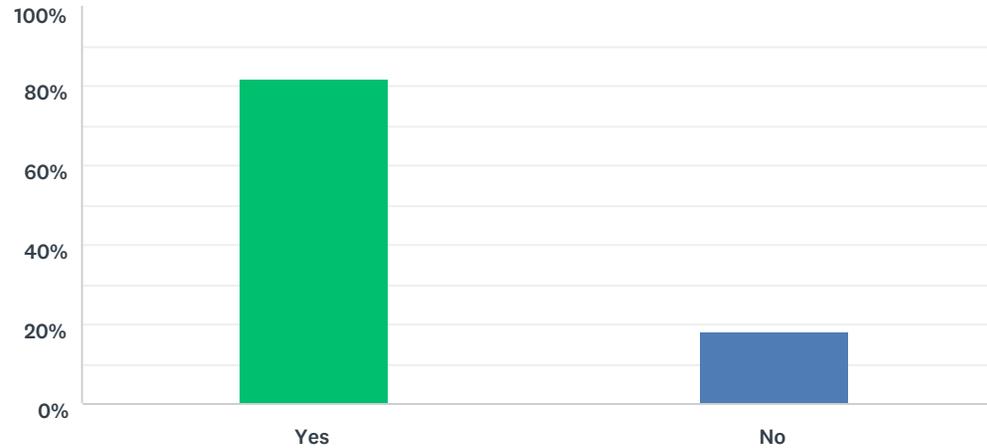
Answered: 35 Skipped: 1,652



ANSWER CHOICES	RESPONSES	
Race or ethnicity	22.86%	8
Age	34.29%	12
Disability	5.71%	2
Religion	2.86%	1
Gender identity	5.71%	2
Sexual orientation	0.00%	0
National origin	2.86%	1
Family status (such as being married or single, having children or pregnant, etc.)	2.86%	1
Criminal background	2.86%	1
Other (please specify)	20.00%	7

Q63 Thinking about jobs in the Omaha/Council Bluffs region that pay enough to support yourself or your immediate family, do you believe you have the right job skills and education to obtain those types of jobs

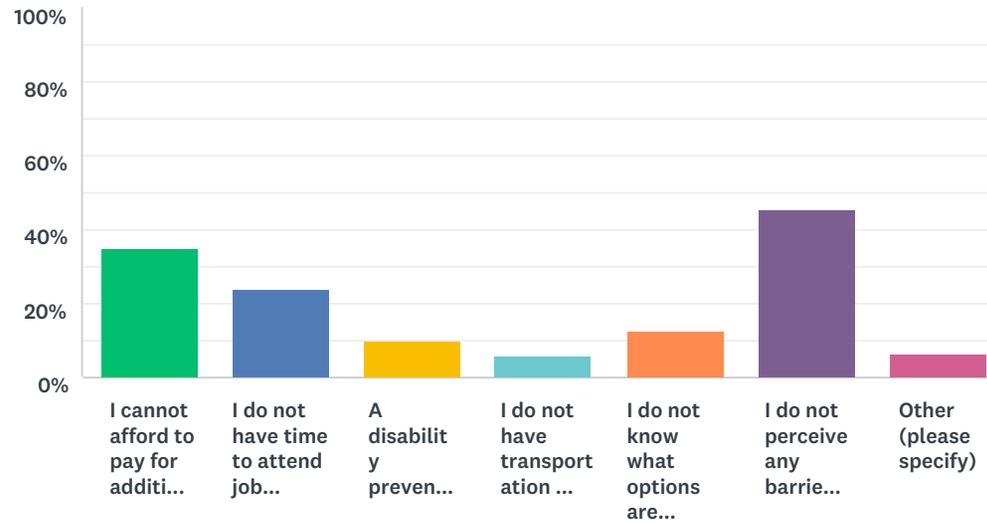
Answered: 998 Skipped: 689



ANSWER CHOICES	RESPONSES	
Yes	81.76%	816
No	18.24%	182
TOTAL		998

Q64 If no, which of the following do you believe are barriers to increasing your job skills or education? Select all that apply.

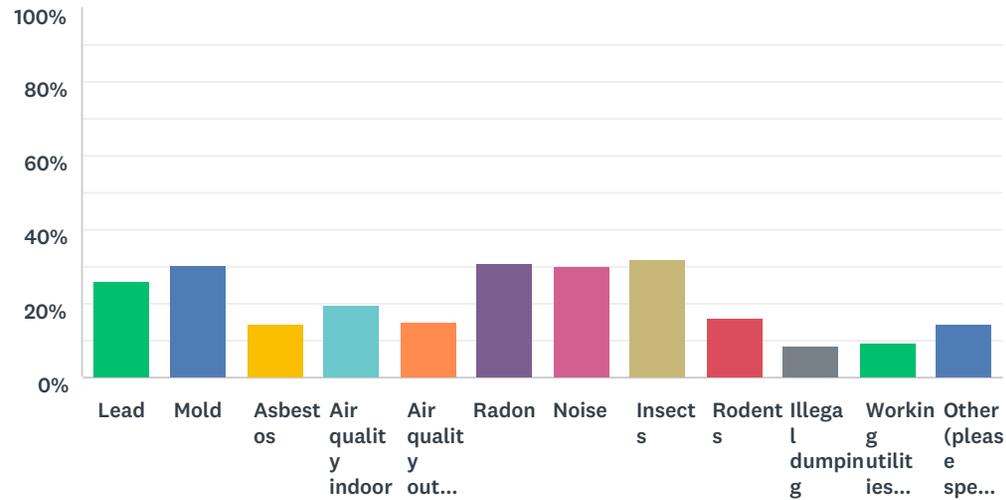
Answered: 423 Skipped: 1,264



ANSWER CHOICES	RESPONSES	
I cannot afford to pay for additional job training or school	34.75%	147
I do not have time to attend job training or school	23.88%	101
A disability prevents me from attending job training or school	9.93%	42
I do not have transportation to attend job training or school	5.91%	25
I do not know what options are available to increase my job skills or education	12.53%	53
I do not perceive any barriers to increasing my job skills or education	45.63%	193
Other (please specify)	6.62%	28
Total Respondents: 423		

Q65 Do you have concerns about any of the following environmental issues at your residence? Select all that apply.

Answered: 780 Skipped: 907



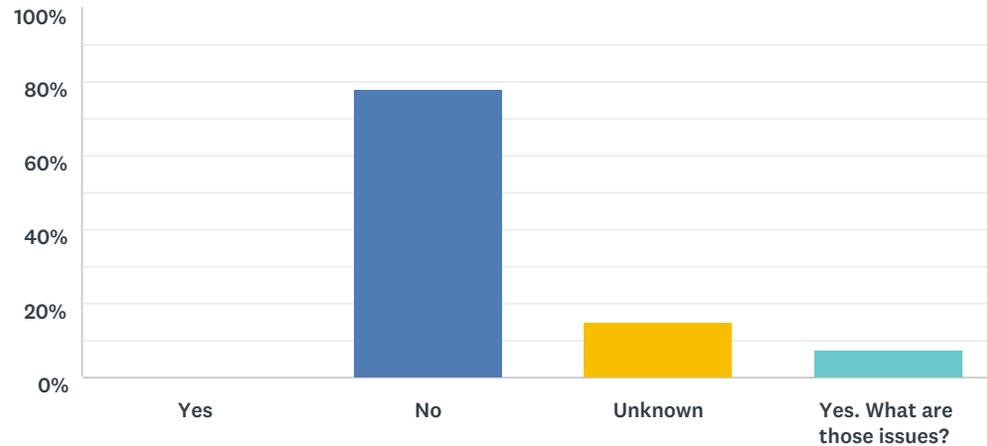
ANSWER CHOICES	RESPONSES
Lead	26.03% 203
Mold	30.51% 238
Asbestos	14.74% 115
Air quality indoor	19.74% 154
Air quality outdoor	15.00% 117
Radon	31.03% 242
Noise	29.87% 233
Insects	31.92% 249
Rodents	16.15% 126
Illegal dumping	8.33% 65

AFFH

Working utilities (water, electricity, gas, trash, etc.)	9.49%	74
Other (please specify)	14.49%	113
Total Respondents: 780		

Q66 Have you experienced any health issues related to environmental health issues (i.e. asthma, elevated blood lead levels, COPD, etc.)?

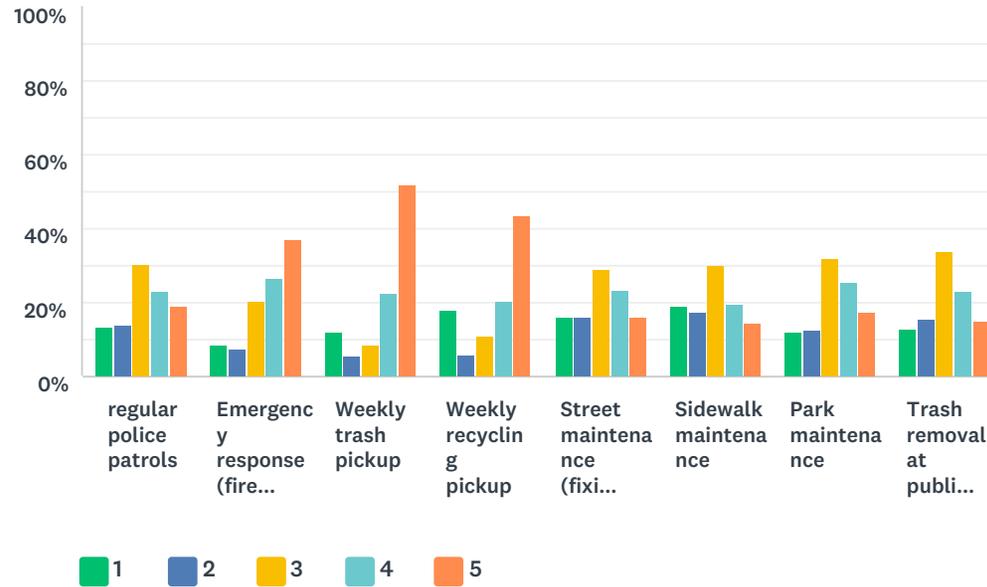
Answered: 1,318 Skipped: 369



ANSWER CHOICES	RESPONSES	
Yes	0.00%	0
No	77.77%	1,025
Unknown	14.87%	196
Yes. What are those issues?	7.74%	102
Total Respondents: 1,318		

Q67 Which of the following services are available in your neighborhood? For services provided, please rate the level of service (1=poor, 5=excellent)

Answered: 1,339 Skipped: 348



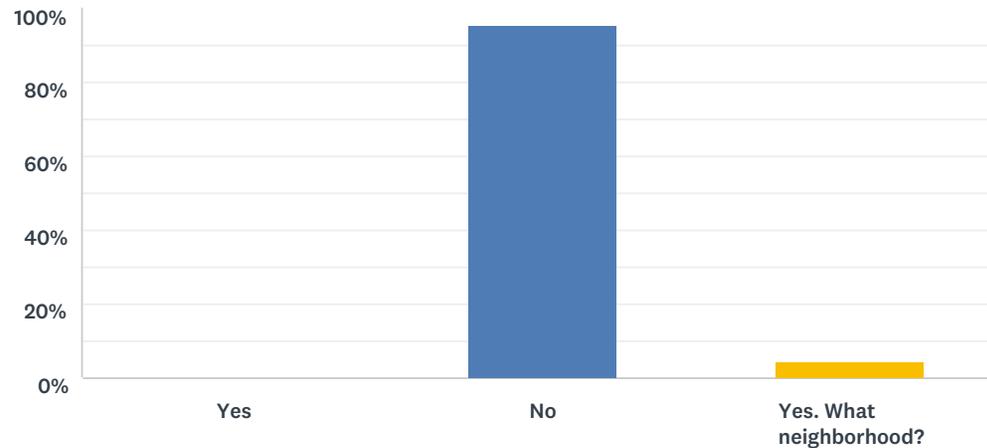
	1	2	3	4	5	TOTAL	WEIGHTED AVERAGE
regular police patrols	13.54% 175	14.01% 181	30.57% 395	23.07% 298	18.81% 243	1,292	3.20
Emergency response (fire, police, ambulance)	8.52% 111	7.67% 100	20.57% 268	26.48% 345	36.76% 479	1,303	3.75
Weekly trash pickup	11.76% 154	5.50% 72	8.32% 109	22.52% 295	51.91% 680	1,310	3.97
Weekly recycling pickup	18.21% 230	6.18% 78	11.24% 142	20.67% 261	43.71% 552	1,263	3.65
Street maintenance (fixing potholes, street sweeping, snow plowing)	15.91% 206	15.83% 205	28.88% 374	23.47% 304	15.91% 206	1,295	3.08
Sidewalk maintenance	18.80% 228	17.31% 210	30.01% 364	19.46% 236	14.43% 175	1,213	2.93

AFFH

Park maintenance	12.08%	12.49%	32.05%	25.64%	17.75%		
	147	152	390	312	216	1,217	3.24
Trash removal at public spaces (bus stops, street or park containers)	12.79%	15.41%	33.93%	23.11%	14.75%		
	156	188	414	282	180	1,220	3.12

Q68 In the last 5 years, did you knowingly move into an environmentally unhealthy neighborhood or residence because you could not afford to move into an environmentally healthy neighborhood or residence?

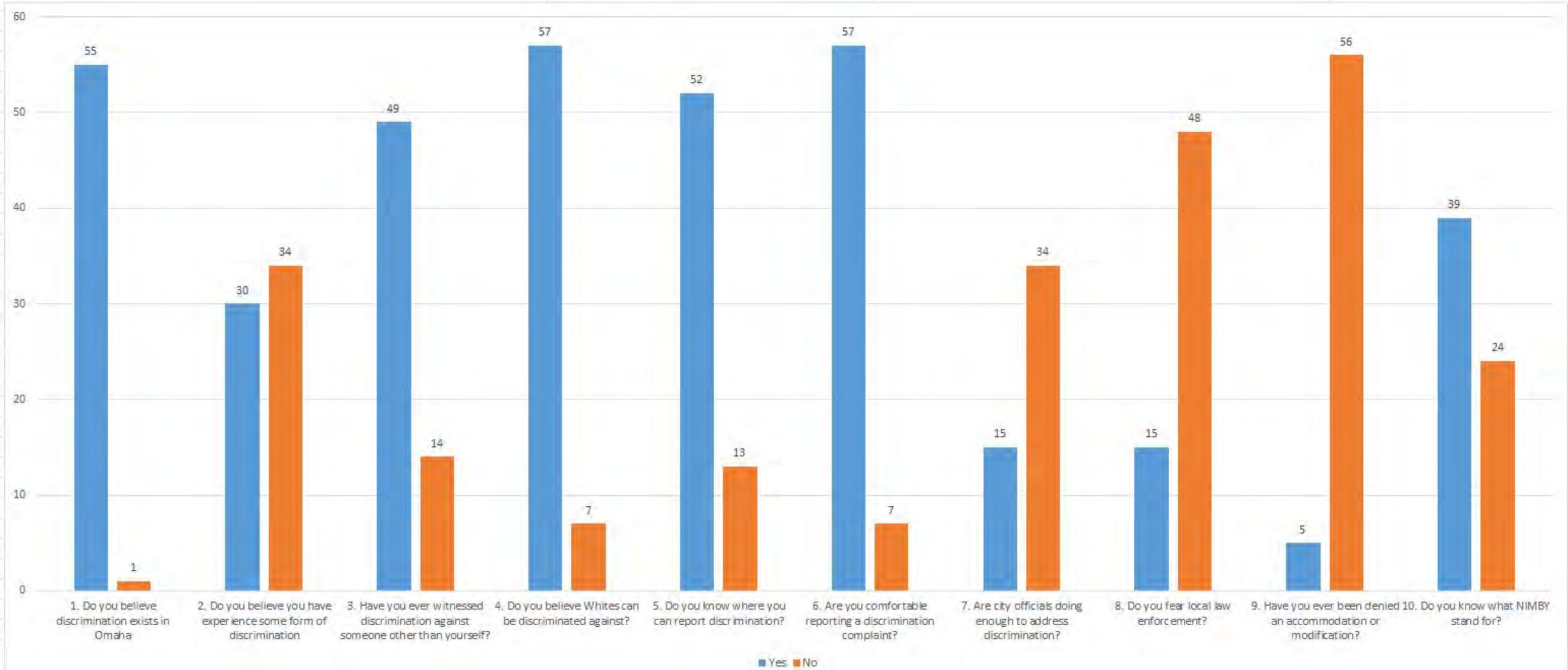
Answered: 1,313 Skipped: 374



ANSWER CHOICES	RESPONSES	
Yes	0.08%	1
No	95.43%	1,253
Yes. What neighborhood?	4.72%	62
Total Respondents: 1,313		

Q69 Is there any other feedback you would like to give in regards to access to housing and resources in the Omaha metro area?

Answered: 326 Skipped: 1,361



**FOR MORE INFORMATION REGARDING
AFFIRMATIVELY FURTHERING FAIR HOUSING,
PLEASE CONTACT ONE OF THE FOLLOWING:**

Mayor's Fair Housing Advisory Board

Attention: City of Omaha Planning Department

Pat Evans, Liaison to the Board

Patricia.Evans@cityofomaha.org

(402) 444-5150

City of Omaha Human Rights & Relations Department

Attention: Rhonda Uher, Education and Outreach Manager

Rhonda.Uher@cityofomaha.org

(402) 444-5067

Fair Housing Center of Nebraska and Iowa

Attention: Joe Garcia, Director

Joe@fhasinc.org

(402) 934-6669



Fair Housing Center of NE-IA

a program of



CITY OF
OMAHA
HUMAN
RIGHTS
& RELATIONS
DEPARTMENT

WHAT IS AFFIRMATIVELY FURTHERING FAIR HOUSING (AFFH)?

Why should I learn about AFFH?

What should I know about AFFH?

Who is the driving force behind AFFH?



Why should I learn about AFFH?

Affirmatively Furthering Fair Housing effects all of us who live in Omaha and the surrounding area.

What should I know about AFFH?

Affirmatively Furthering Fair Housing is the U.S Department of Housing and Urban Developments way of assisting communities like Omaha to provide equality throughout the community in housing.

Specifically, "affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing and needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity and fostering and maintaining compliance with civil rights and fair housing laws."

Who is implementing AFFH?

The Affirmatively Furthering Fair Housing Rule has been in effect since the beginning of the Fair Housing Act. However, the Rule was amended in 2015 and is being implemented by the U.S. Department of Housing and Urban Development along with it's state and local fair housing partners; i.e. City of Omaha Planning Department, City of Omaha Human Rights and Relations Department, and the Fair Housing Center of Nebraska and Iowa.



Do you believe discrimination exists in Omaha?

YES ___ NO ___

Do you believe you have experienced some form of discrimination?

YES ___ NO ___

Have you ever witnessed discrimination against someone other than yourself?

YES ___ NO ___

Do you believe Whites can be discriminated against?

YES ___ NO ___

Do you know where you can report discrimination?

YES ___ NO ___

Are you comfortable reporting a discrimination complaint?

YES ___ NO ___

Are City officials doing enough to address discrimination?

YES ___ NO ___

Do you fear local law enforcement?

YES ___ NO ___

What do you believe is the number one reported basis for discrimination

Race ___ Color ___ Sex (gender) ___ Religion ___ Disability ___

National Origin ___ Marital Status ___ Age ___ OR

Familial Status (children in the home under 18) ___

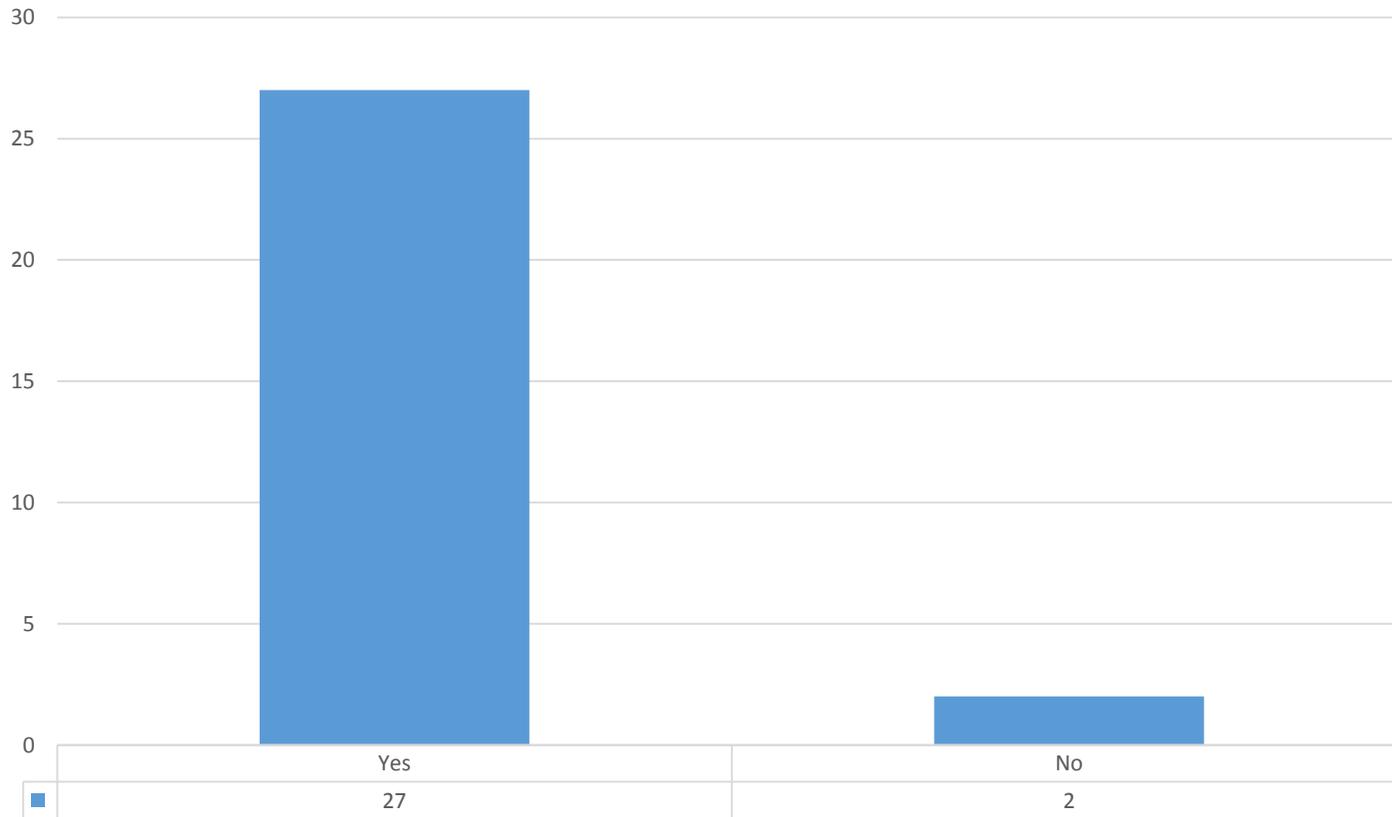
Have you ever been denied an accommodation or modification?

YES ___ NO ___

Do you know what NIMBY stands for?

YES ___ NO ___

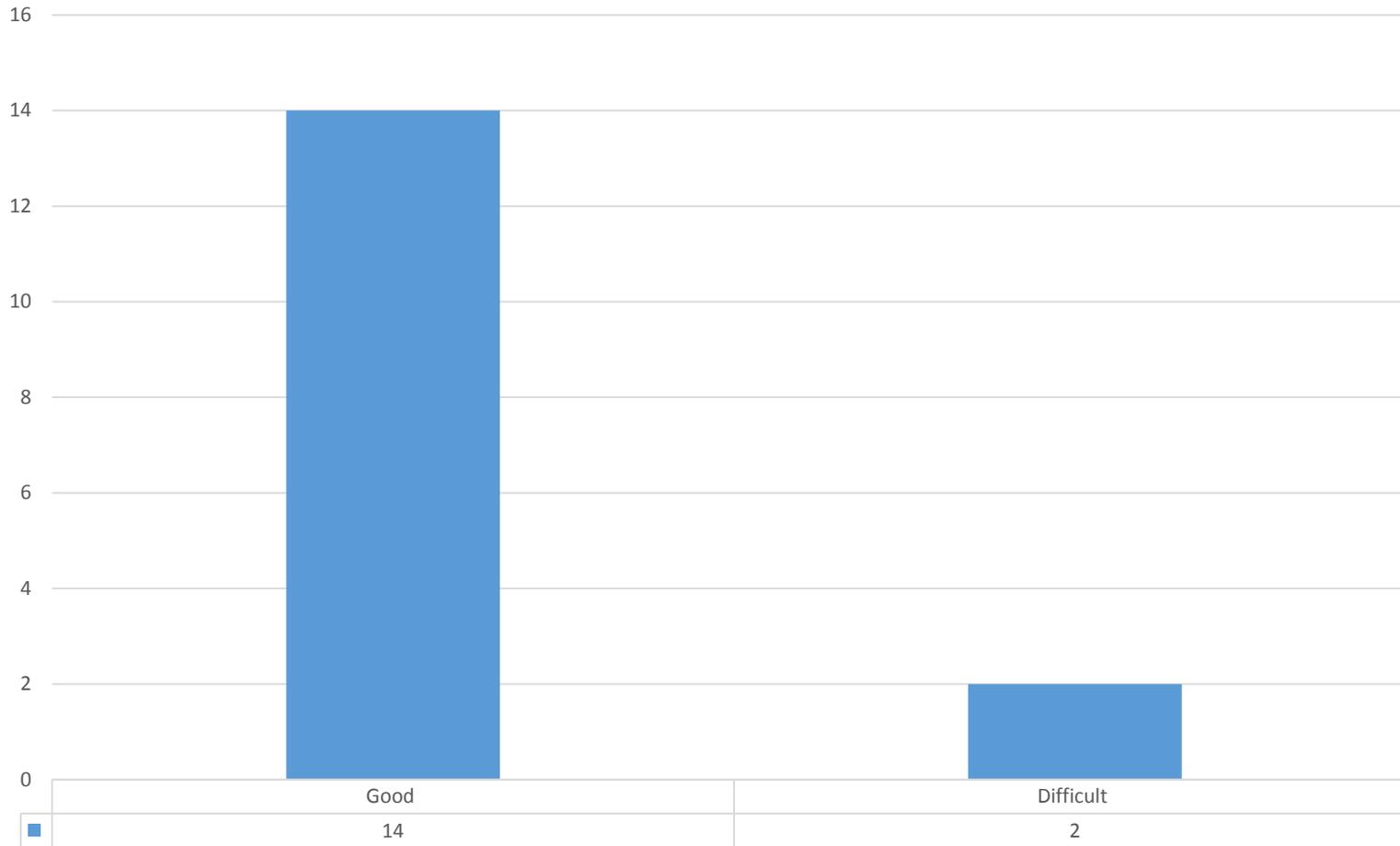
Does your current housing meet your needs? (Are you satisfied with the quality, location, and size?)



Comments:

- 1.) Meet needs, but need a larger house
- 2.) No, not happy with the location

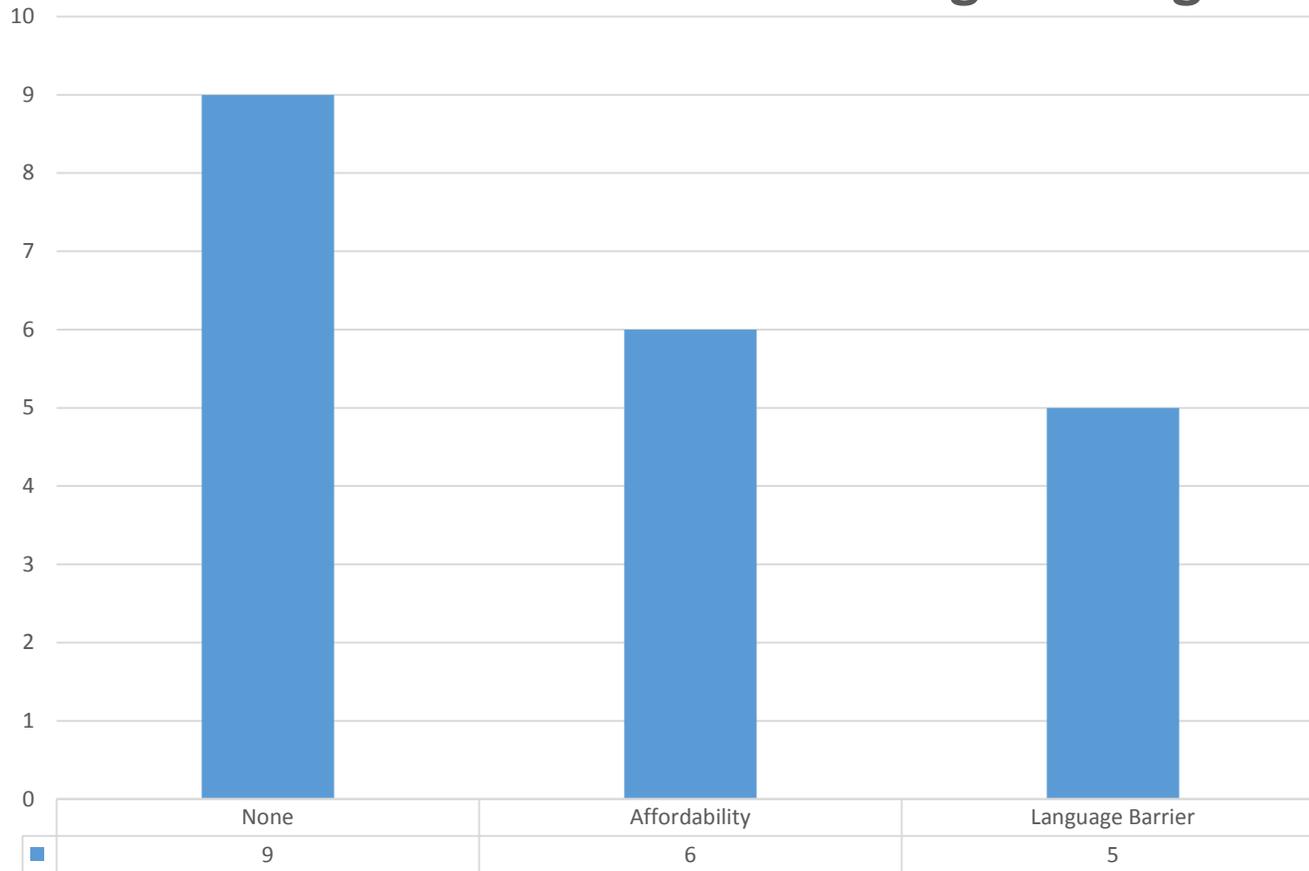
How did you find housing?



Comments:

- 1.) Omaha Housing Authority
- 2.) Martin Luther Building
- 3.) Ad in newspaper
- 4.) Caseworker
- 5.) Cousin
- 6.) Lutheran Family Services
- 7.) Online
- 8.) (Omaha housing for sale
- 9.) I identified the location and then I searched
- 10.) Friend
- 11.) Omaha Housing Authority
- 12.) Friend

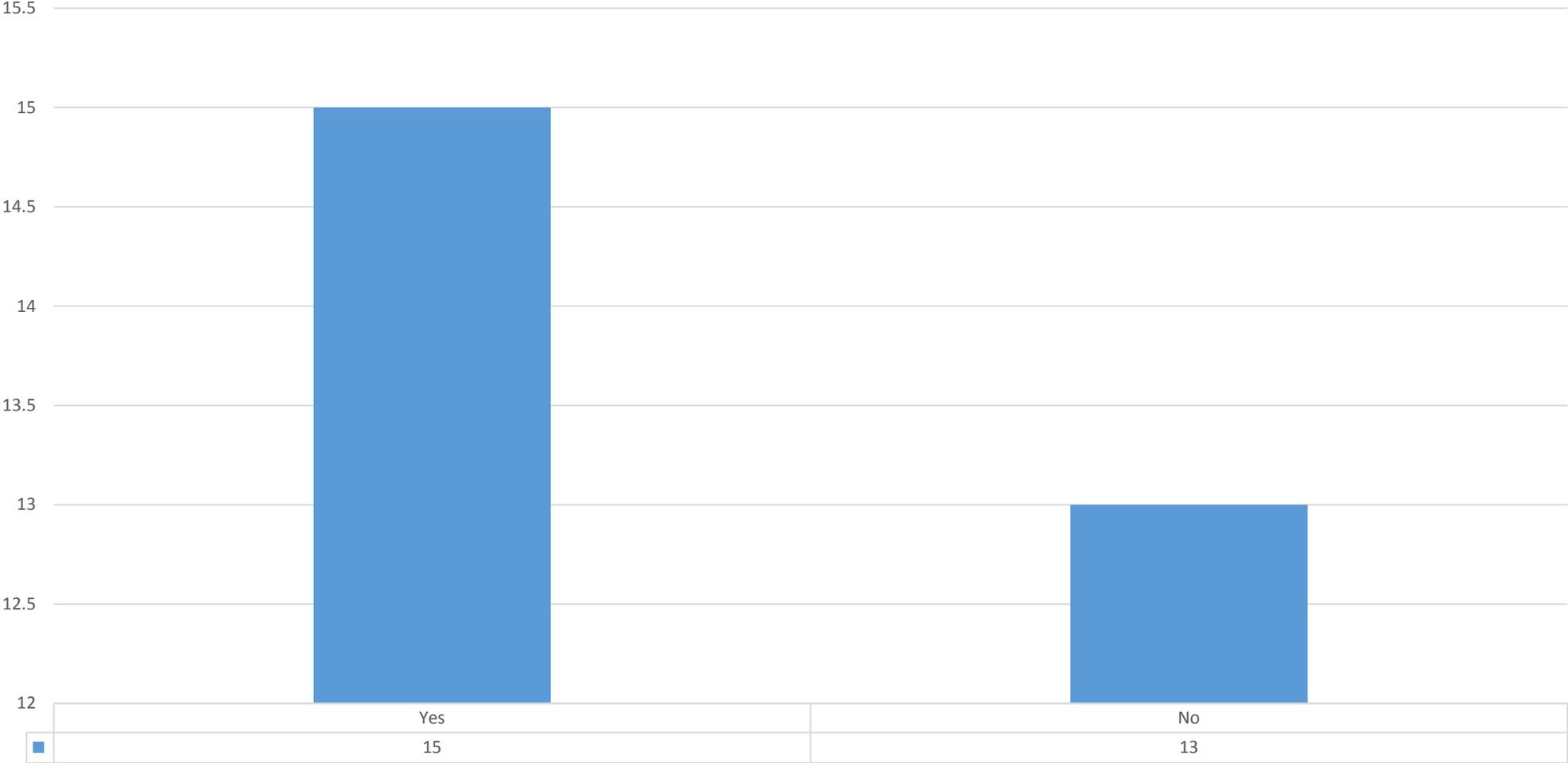
What was your greatest challenge/obstacle to obtaining housing



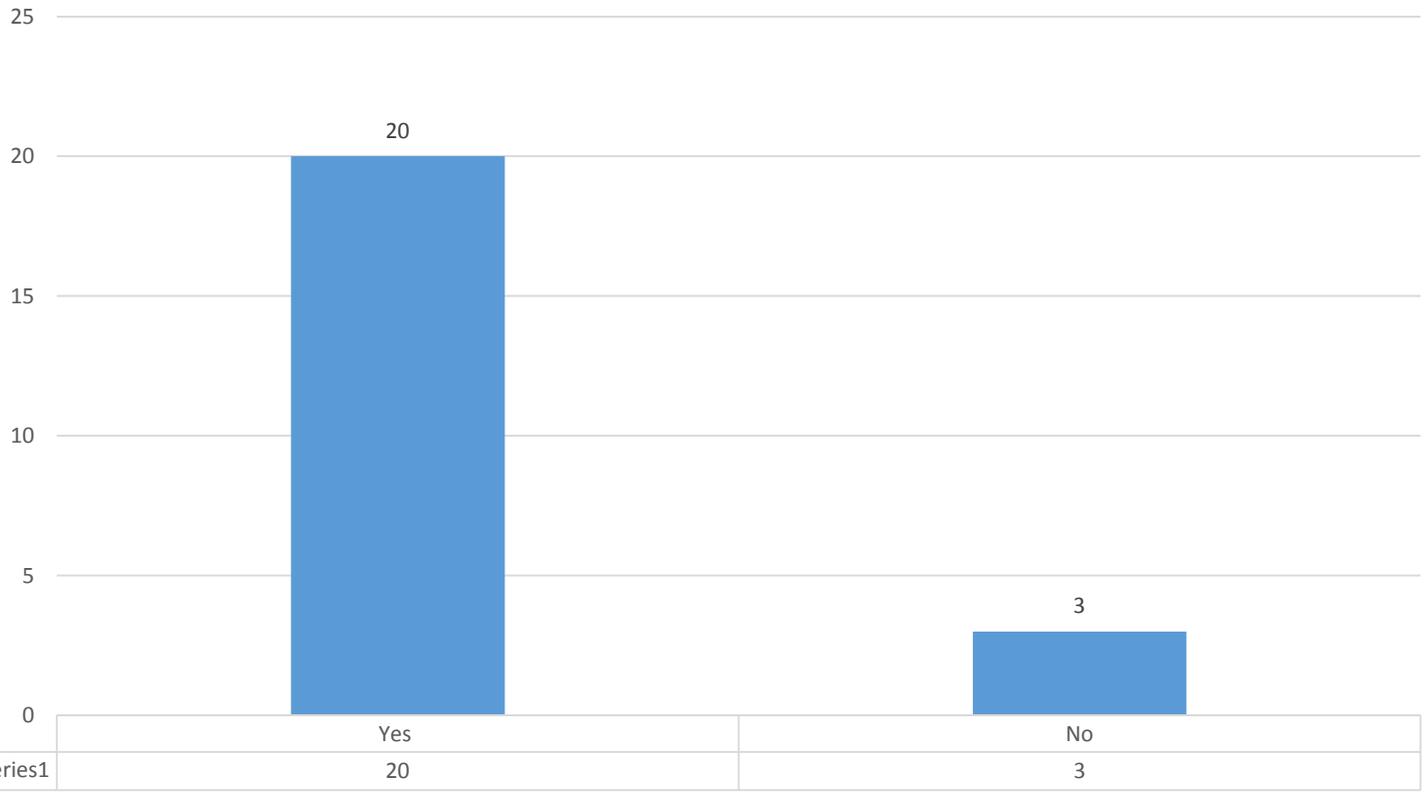
Comments:

- 1.) Rental history
- 2.) Lack of documents
- 3.) Website are not showing every option
- 4.) Rent and location
- 5.) It takes time to get it
- 6.) Lack of information on where to find the right location and right house to suit budget
- 7.) Lack of information on housing
- 8.) Long waitlist

Do you spend more than 30% of your income on housing?

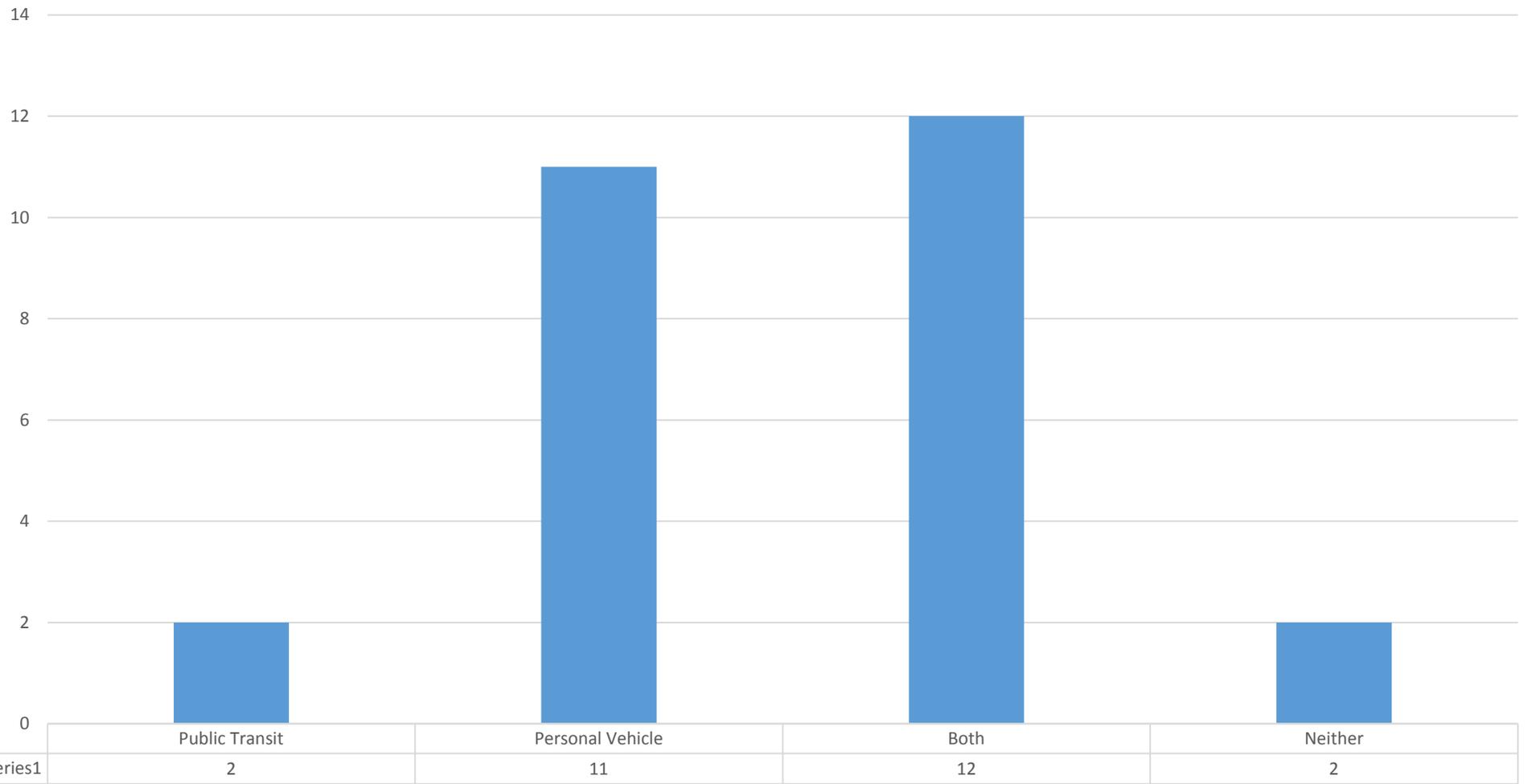


If you are employed, how did you find employment? Are you satisfied with your current employment?

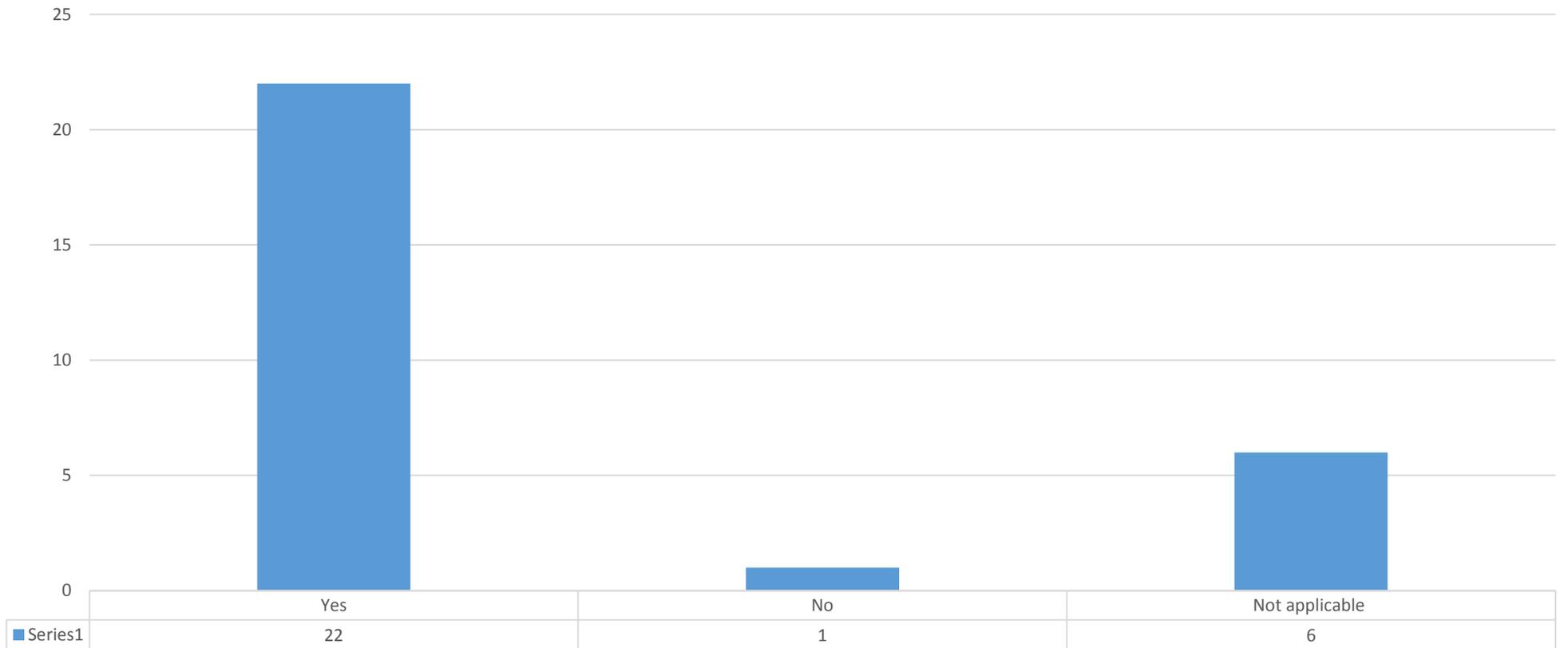


- How did you find employment?**
- 1.) Online
 - 2.) Career link
 - 3.) Workforce development currently
 - 4.) The payment does not meet my housing needs
 - 5.) Caseworker
 - 6.) Through agency
 - 7.) Not employed
 - 8.) Online
 - 9.) Online

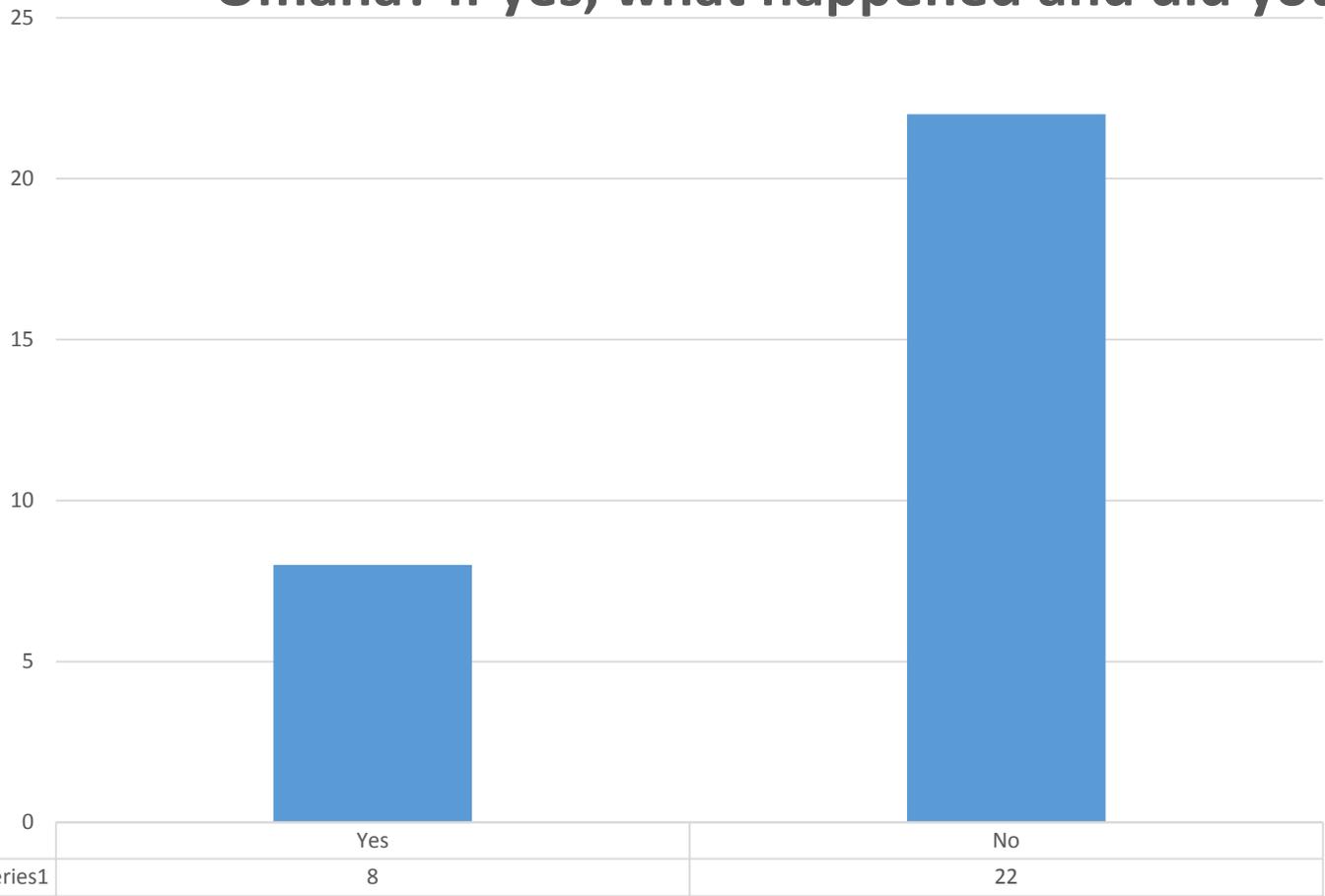
What method of transportation do you use/how do you get from one place to another in Omaha?



If you have children, what has been your experience with your children attending school? Are you satisfied with the quality of education? Has the school provided adequate assistance for your child?



Have you experience any discrimination/unfair treatment when trying to obtain housing, employment, education in Omaha? If yes, what happened and did you report it?



Comments:

- 1.) Yes, when trying to find an apartment
- 2.) It is always there in the work place
- 3.) Yes. I experience discrimination at work all the time
- 4.) Somehow every day in everything
- 5.) Yes. There still unfair treatment when it comes to housing and education in Omaha. I don't know where to report it.



Fair Housing Assessment Worksheet

Council Bluffs Development Community Meeting

Prevalent Issues

1. What fair housing issues are most prevalent in the region
 - Income
 - Lack of available housing and Lack of housing assistance
 - High price housing
 - Comfort animals
 - People not having the income to get info on homes
 - Affordability
 - Affordability and availability housing stock
 - Lack of affordable housing for families 4 or more
 - Lack of high paying jobs
 - Affordability quality, multi-family units
 - Handicap accessible
2. What housing challenges, if any, do marginalize communities' experience?
 - Credit
 - Poor housing choices- major repairs needed, lack of safe houses
 - Political
 - Quality people to rent to in the area
 - Having people who qualify without gaming the system
 - Availability, cost
 - Education and training for individuals to increase their paycheck to be able to afford rent
 - People living poor standards- bad houses/apartment that charge too much
 - Funding to build affordable housing too low of income to affordable housing, housing to accommodate family size

Top prevalent issues:

- Lack of affordable/ accessible housing
 - Affordability of the housing available
 - Income
3. Has NIMBY (not in my backyard) been an issue for you?
 - Major reason for Gunn school not becoming low, income apartments
 - NO- 4 major apartment buildings in one neighborhood
 - Yes- laws, zoning changes
 - Not in CB

- North Broadway w/senior housing
4. Any challenges leasing accessible unites to PWD (People with disability)
- Lack of accessible houses
 - Picking houses that would be hard to make accessible
 - Need affordable apartments that are handicap accessible all area of the city. Money to make existing buildings accessible
 -

Contributing Factors

- 1.) Is there a lack of incentives/capacity to build or preserve affordable housing?
- a. The cost to maintain affordable housing is greater than the rent income received
 - b. Funding streams/ political
 - c. Single family housing- mid- city, North and South, higher end housing no- both are prominent
 - d. It is there if people will qualify for it
 - e. No, the city wants to build accessible hosing to force landlords that are already supplying those needs out of the market
 - f. Cost often prohibits building of new units
 - g. Cost of what is often more than individual can afford
 - h. Cost of rehab vs available funding
 - i. There is not a lot of green space to build new units
 - j. Yes, a lot of old homes on west end need resources towards rehab and repair
- 2.) Are there zoning/regulations that result in higher rent/prices?
- a. Yes
 - b. House inspection programs
 - c. Unaware of the aspect
- 3.) Do marginalized communities experience disparities in access to employment? High quality schools? Transportation? Low poverty neighborhoods? Why or why not?
- a. Schools becoming overcrowded- Walnut Grove, lack of public transit
 - b. Skills, pass drug and alcohol screening
 - c. Transportation limited
 - d. Yes, transportation too far away, cost is a factor
 - e. Not in CB. They are low enough that people have access in the whole town
 - f. Transportation in an issue often for individuals living in poverty- living further because of affordability
 - g. Transportation- the routes are not there, bus stops are too far away
 - h. Transportation to get jobs is a concern, higher paying jobs, and management opportunities for families
 - i. Yes, public transportation is a major barrier in CB
- 4.) What types of housing are in high demand in the region?
- a. Single family and affordable housing
 - b. Entry level
 - c. All type of housing
 - d. Rental units

- e. 3 bedroom homes
- f. Single family
- g. New houses, affordable/ market value homes units
- h. Family/ affordable that are decent to live in
- i. Low income 2bedroom
- j. Affordable multi-family units
- k. Affordable, accessible, right size

Top contributing factors:

- Funding to build or rehab homes
- Lack of transportation
- Lack of single family affordable housing

Strategies

5.) Who is underserved in the market?

- a. Working poor
- b. The poor
- c. Low income- non working people on drugs
- d. The landlord who must put up with low quality people
- e. Low income/ individual with credit issues
- f. Low income people
- g. Families with poor credit and work history
- h. Lowest poverty residents, people in the middle housing section above public assistance but below owning their own homes
- i. Low income

6.) How would you mitigate housing issues in the area to increase access to opportunity?

- a. Incentivize owners and landlords
- b. Less control by government
- c. Encourage people to stay off drugs and get jobs
- d. More bus routes
- e. Work history, number of children, references
- f. More investment on the west end of CB

Top Strategy:

- City incentivized landlords to improve their homes
- Revising vacant lot policy to allow development on vacant lots
- More incentive to rehab homes

Comments:

Why minorities don't live in Council Bluffs

- Latinos prefer to live in South Omaha
- People tends to stay where they know
- Self-segregation by living around people and group of people you know
- More refugee resources in Omaha
- Disable population are living up north due to low housing cost

What phrase stands out to you?

- Quality
- Housing
- Incentive

What does this tell you about housing in Council Bluffs?

- People have maintained old homes for years
- Lack of green space

Pressing issues?

- Jobs for people
 - Training for quality people
- Landlords don't upgrade homes due to tax increase



Fair Housing Assessment Worksheet

Civil Rights Group

Prevalent Issues

1. What fair housing issues are most prevalent in the region?
 - Affordable safe housing
 - Repair multifamily homes with multi-bedroom units
 - Because Omaha is one of the most segregated cities in the USA, a revamp is headed in the South Omaha, and North Omaha Regions
 - Issues affecting persons with disability/ accessibility/ companion animals/ tenant screening, racial and ethnic screening
 - Discrimination against families with children
 - Safe, accessible affordable houses large enough to accommodate larger, low-income families
 - Safe, affordable, and clean house
 - Affordable in non-desirable areas

Top prevalent issues:

- Lack of safe affordable housing
- Lack of large multifamily homes

Contributing Factors

2. What factors contribute to fair housing issues/discrimination?
 - Lack of housing and affordable
 - School politics/ marketing by school districts
 - Landlords are always an issue with being up to code for people with disabilities
 - Race/ethnicity/income/ lack of affordable homes
 - Low income, disability, racial basis
 - Age of housing units, ability of housing units to be updated
 - Lack of affordable housing, limited or reduced federal funding section 8
3. Do any state/local policies/practices limit the ability of people with disabilities to live in independent integrated settings? Zoning? Family definition? Group home regulations? Medicaid reimbursement? How would you address?
 - Earnings
 - Policies aren't the issue, the problem is the reinforcement of codes/policies to landlords
 - Family definition- how many can occupy
 - Support system help disable people

4. Do any local/state policies/practices contribute to fair housing issues? Which? Who is impacted? How address?

- Reinforcement of fair housing policies to landlords to be emphasized
- Rental inspection program benefits
- Rental inspections

Top contributing factors:

- Landlords
- Lack of code reinforcements
- Lack of affordable housing

Strategies

5. How would you address these issues? Which protected classes are impacted?

- Low income- moderate income
- Disabilities
- Provide more affordable housing
- More tax break to landlords
- Offer more mortgagee options
- CDBG/TIF
- Provide more low income and larger units for families in CB
- Minorities, disable, low income

Top strategies:

- Provide more affordable/larger units
- More funding for incentives



Fair Housing Assessment Worksheet

Resident Advisory Board

Prevalent Issues

1. What fair housing issues are most prevalent in the region?
 - Affordability
 - Increase rent prices/ property taxes/ mental health/ substance abuse
 - Services for low income/poverty are not realistic or are too difficult to utilize
 - The area you live in (neighbors)
 - No matter where you are there is going to be people that don't like it
 - Affordability (income)
 - Service weren't realistic (assistance)
 - Substance abuse
 - Not enough low income and disability accessible housing
 - Employment (income)
 - Lack of affordable housing
 - Rent condition
 - Schools, grocery stores, public transit
 - Not enough housing
 - Services and assistance is not readily available or not realistic
 - Affordable housing
 - Crime
 - Affordability

Top prevalent issues:

- Lack of affordable homes
- Affordability
- Income
- Substance abuse/crime

Contributing Factors

2. What factors contribute to fair housing issues/discrimination?
 - Size of family
 - Record
 - Income
 - Housing (not enough facilities)
 - Income
 - Disability
 - Employment opportunity
 - Lack of understanding
 - Schools (location and adequate facilities)

- NIMBY (Not in my backyard)
3. Do any state/local policies/practices limit the ability of people with disabilities to live in independent integrated settings? Zoning? Family definition? Group home regulations? Medicaid reimbursement? How would you address?
 - A lot of it has to do with the people in certain areas
 - Disable population having a hard time finding housing
 - Apartments to include units that has proper doorway, public access
 4. Do any local/state policies/practices contribute to fair housing issues? Which? Who is impacted? How address?
 - Tax increase affect low income/poverty because rent increase
 - The new inspection has been a contributing factor into rent increase
 - Schools
 - Accessibility
 - NIMBY
 - Income
 - Limited options because of disability, criminal background, family size
 - New inspection increased vent in CB
 - ADA, elevators, doorways
 - Rental inspections

Top contributing factors:

- Income/ education level
- Housing
- Background record

Strategies

5. How would you address these issues? Which protected classes are impacted?
 - Offer tax breaks to landlords/apt complexes.
 - Have more public meetings to get areas input from people in all areas of the cities
 - Offer more incentive to complexes to provide affordable housing to disable and low income population
 - Legislation
 - Report and hold people/officials accountable

Top strategies:

- More funding for incentives to landlords
- Educate the community

Comments

Word or phrase that stood out?

- Resistance to change
- Affordability
- Accessibility

What is most challenging?

- Finding resources to social services and awareness
 - Many resources are based out of Omaha, so they are not always in Council Bluffs
 - Having more resources based in Council Bluffs
- Getting the community involved or to care

What is the next step?

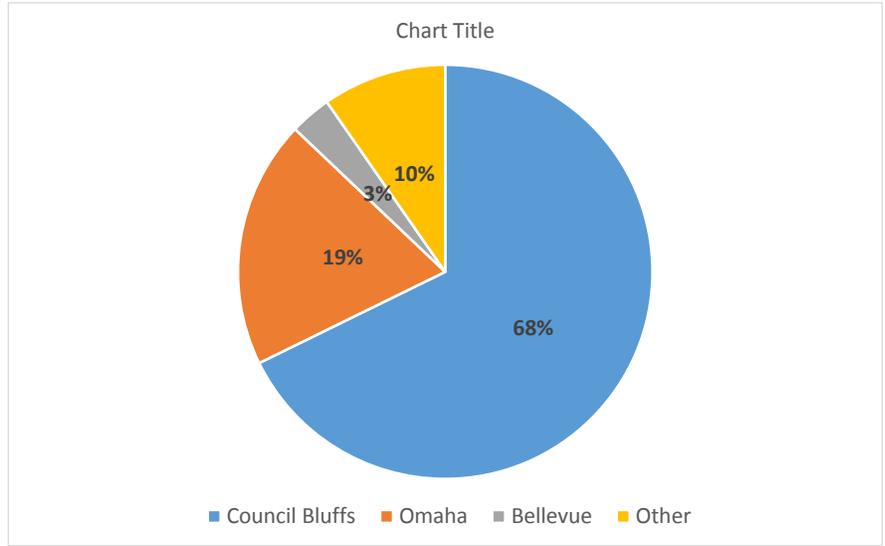
- Encourage agencies to work together

Number 1 priority?

- Education and coordinate
 - Showing people and educating people about housing discrimination

Where do you work?

Council Bluffs	21
Omaha	6
Bellevue	1
Other	3



Where do you work?

	8/8/2017	8/10/2017
Council Bluffs	10	11
Omaha	4	2
Bellevue	1	0
Other	2	1

Do you rent or own your home?

Rent

Own

6

23

Do you rent or own your home?

Rent

Own

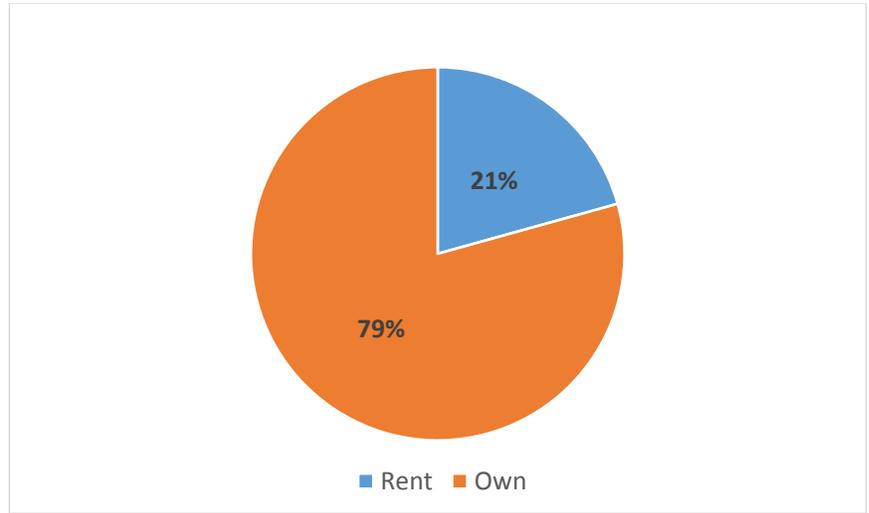
8/8/2017 8/10/2017

3

3

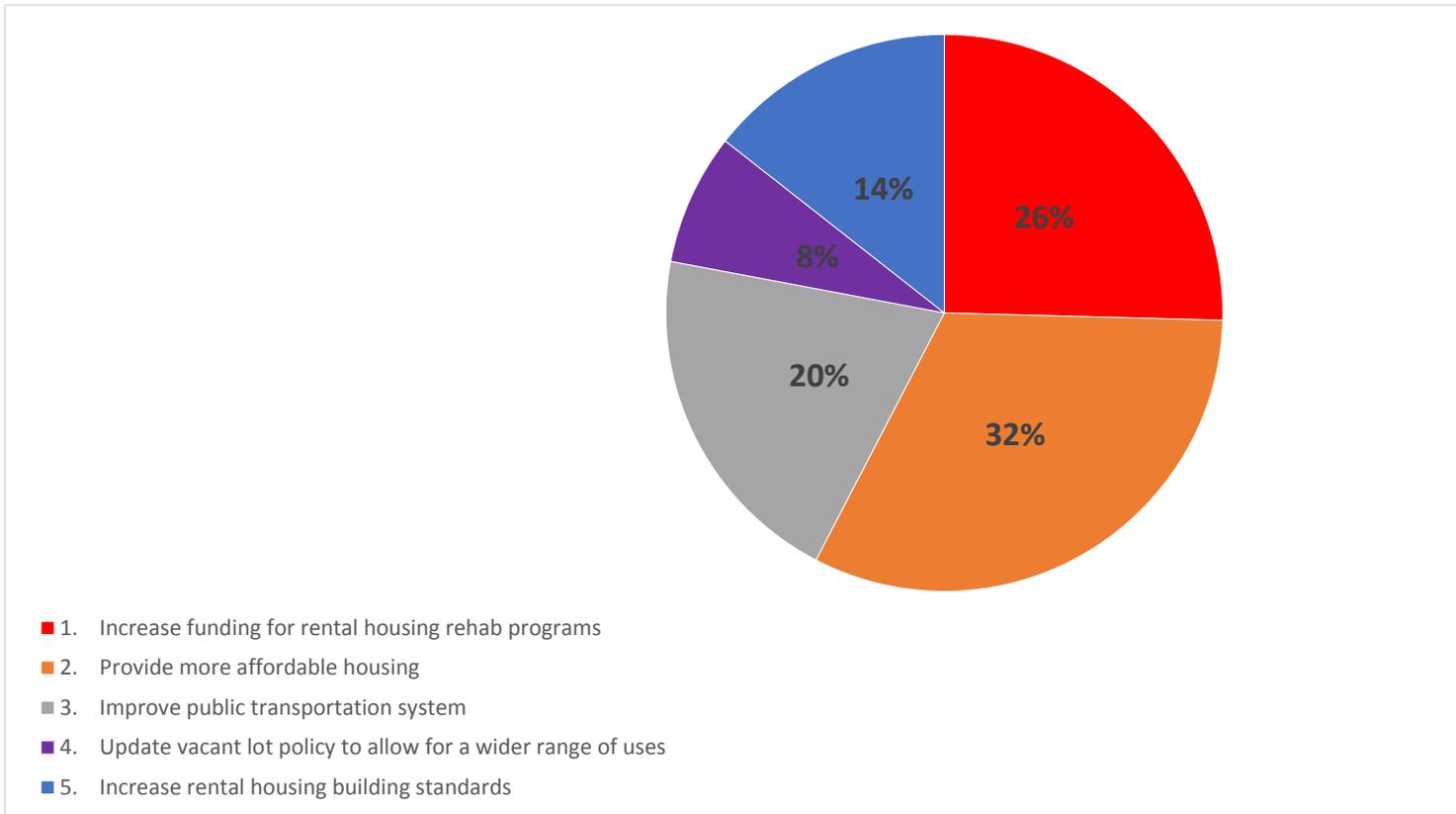
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11



Updated on: 8/9/17

Strategy	Number of Chips
1. Increase funding for rental housing rehab programs	30
2. Provide more affordable housing	38
3. Improve public transportation system	24
4. Update vacant lot policy to allow for a wider range of uses	9
5. Increase rental housing building standards	17



Strategy	8/8/17 open house Number of Chips	8/10/17 Open house
1. Increase funding for rental housing rehab programs	16	14
2. Provide more affordable housing	15	23
3. Improve public transportation system	15	9
4. Update vacant lot policy to allow for a wider range of uses	6	3
5. Increase rental housing building standards	9	8



MAPA Omaha - Council Bluffs
Metropolitan Area
Planning Agency
Connect. Plan. Thrive.



***Affordable-** the term affordable housing is used to describe housing, rental or owner-occupied, that is affordable no matter what one's income is. The U.S. government regards housing costs at or below 30% of one's income to be affordable.

***Market rate-** Market Rate Housing. Refers to properties that are rented or owned by people who pay market rent to lease the property or paid market value when they bought the property. There is no subsidy for the housing

What do you see as the most needed type(s) of housing? Pick 2

Single Family affordable



Single Family market rate



Multi-Family affordable



Multi-Family market rate



Multi-Family Mixed income



Special needs housing



Elderly affordable



Elderly market rate

Other

● = 8/8/17
● = 8/10/17

- Read through the most common issues and solutions that had been proposed by community leaders.
- After identifying the issue you find important, place a sticker that you think represents the best solution to that issue.
- Provide comments on worksheet next to this board in the comment box associated with number on your sticker.



Council Bluffs

Biggest Issues → Solutions ↓	Lack of transportation/ Lack of affordable housing near public transportation	Lack of affordable housing units all throughout the region	Lack of accessible housing for people with disabilities	Concentration of communities in high poverty in Council Bluffs	Lack of employment opportunities located in Council Bluffs
Increase funding for rental housing rehab programs	11	3	12 13	2	8
Provide more affordable housing		2 4 5 3 5 6	7	6 4	
Improve public transportation system	1 9 14				10 16
Update vacant lot policy to allow for a wider range of uses					
Increase rental housing building standards					

17

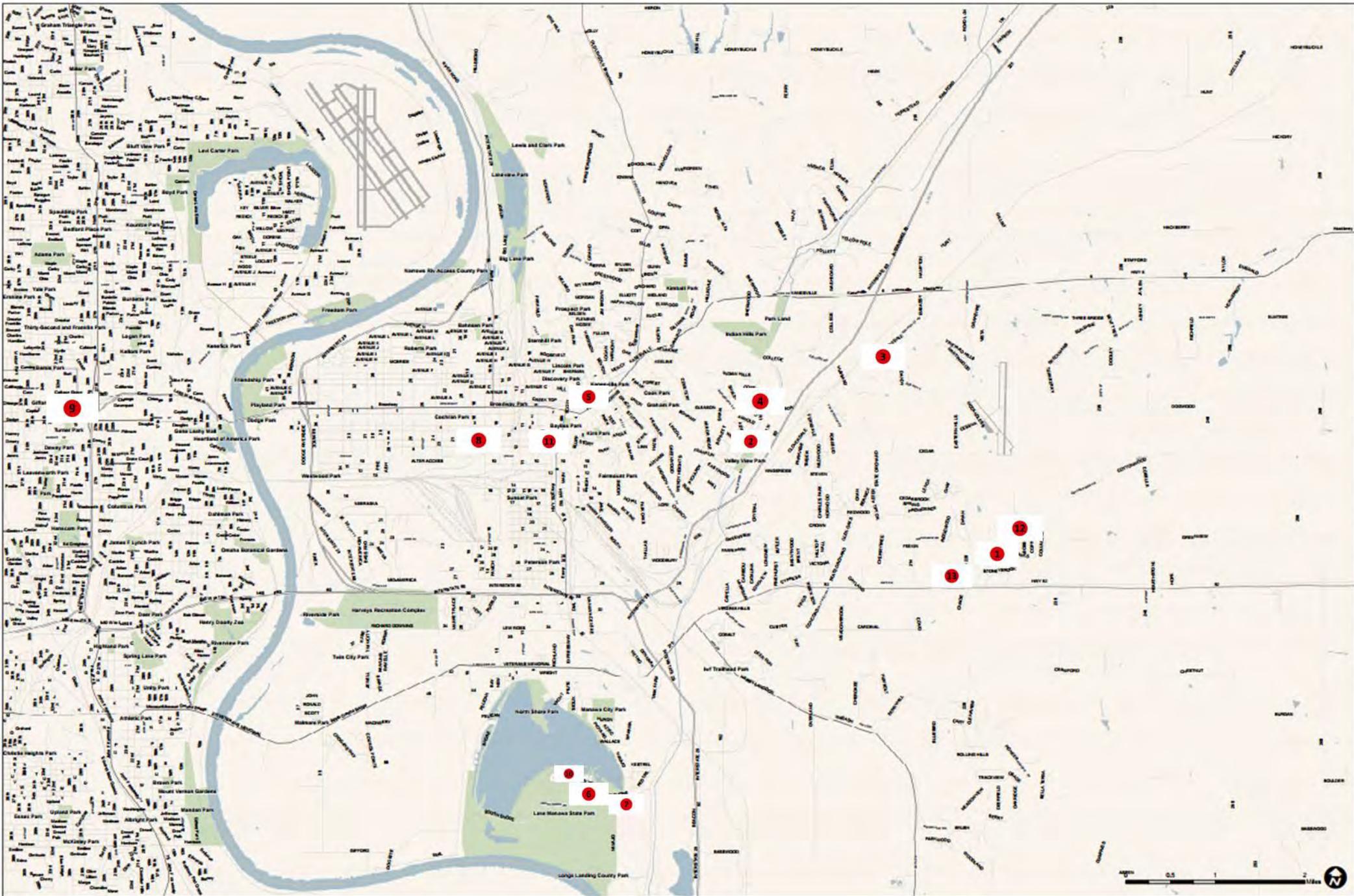
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● = 8/8/17
● = 8/10/17

Comment worksheet

1	
2	Single mom of 4 live in bad area, but affordable
3	Transportation for individuals in poverty extremely limited
4	Many homeless and poverty population have time but have hard time affording housing
5	More affordable, high rise apartments
6	Provide more affordable housing
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8-10-17 CB Open House

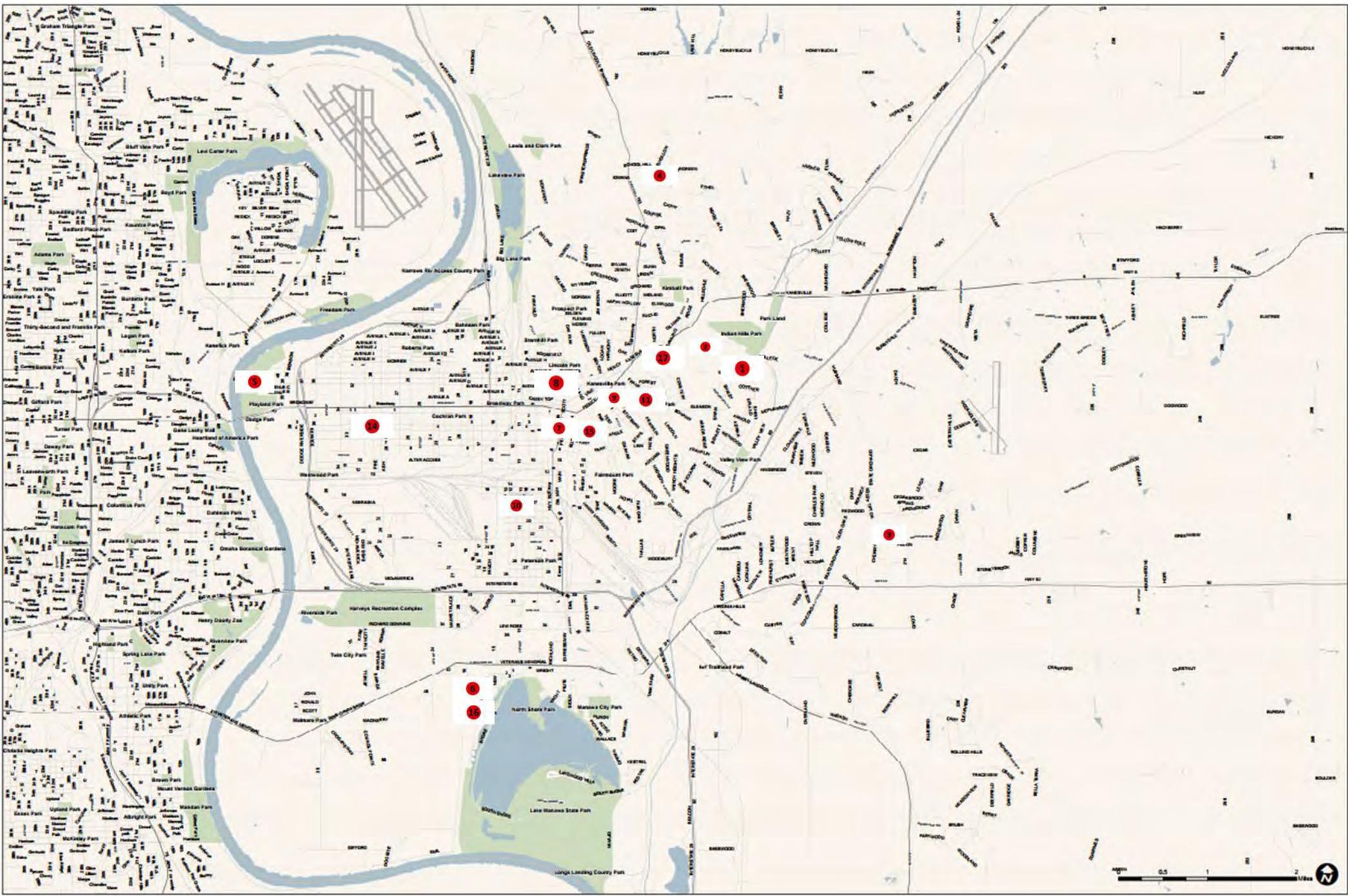


Comment worksheet



1	I would like to live within the Lewis Central school district to offer my children better education
2	Less crime, less drugs
3	
4	
5	
6	Just want to be by the lake
7	I want to live on the water. Bike trails, easy access to Omaha, near shopping. ON WATER
8	I don't have loud neighbors. I like my big backyard. Off street parking (Driveway)
9	Millard or Elkhorn better schools
10	
11	It is where I live. Accessible of amenities and transportation
12	
13	Want house with land
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19	
20	

8-8-17 CB Open House



Comment worksheet



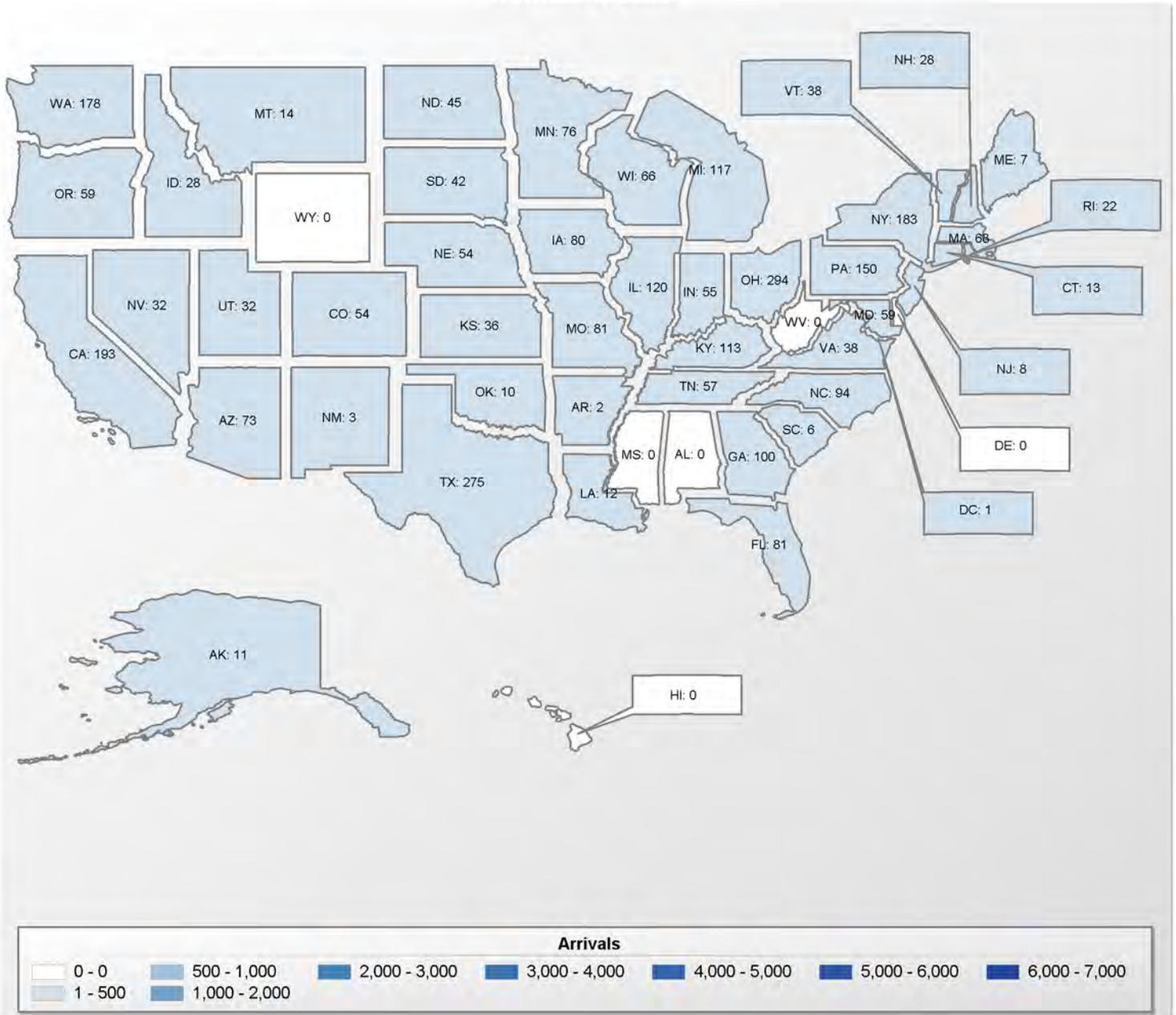
♥ = Current area

1 ♥	No neighbors
2	By other stickers- like neighbors
3 ♥	Small old neighborhood
4 ♥	Country, private, like to move in town for retirement
5	View of downtown
6	Beautiful lake, outdoor, access to lake
7	Like to live near downtown, like to be by park and library
8	Downtown, historic Council Bluffs, walkable
9 ♥	Close to everything
10	South end is diverse, young couples, affordable
11	Friends in area, nice homes, Bluffs
12	Newer area, new housing stock
13	New housing stock
14 ♥	Quiet, safe, clean, only hispanics
15	My neighborhood is well mixed economically and nice place
16	Pretty, expensive
17	
18	Favorable environment, older population, beautiful
19	
20	

Department of State
Bureau of Population, Refugees, and Migration
Office of Admissions - Refugee Processing Center
Refugee Arrivals by State
From October 1, 2017 through November 30, 2017

Cases: 1,290 **Individuals:** 3,108

Arrivals by State



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Refugee Arrivals by State
From October 1, 2017 through November 30, 2017

Cases: 1,290 **Individuals:** 3,108

State	Case	Inds
Alaska	2	11
Arizona	34	73
Arkansas	2	2
California	92	193
Colorado	23	54
Connecticut	4	13
District of Columbia	1	1
Florida	33	81
Georgia	45	100
Idaho	9	28
Illinois	48	120
Indiana	21	55
Iowa	34	80
Kansas	10	36
Kentucky	47	113

State	Case	Inds
Louisiana	3	12
Maine	2	7
Maryland	31	59
Massachusetts	34	68
Michigan	54	117
Minnesota	37	76
Missouri	25	81
Montana	4	14
Nebraska	21	54
Nevada	17	32
New Hampshire	8	28
New Jersey	3	8
New Mexico	3	3
New York	75	183
North Carolina	47	94

State	Case	Inds
North Dakota	18	45
Ohio	107	294
Oklahoma	3	10
Oregon	29	59
Pennsylvania	61	150
Rhode Island	9	22
South Carolina	2	6
South Dakota	15	42
Tennessee	28	57
Texas	110	275
Utah	15	32
Vermont	14	38
Virginia	14	38
Washington	73	178
Wisconsin	23	66

*Please note Special Immigrant Visa (SIV) recipients who have elected and received U.S. Refugee Admissions Program (USRAP) Reception and Placement (R&P) benefits are not included in this report.

Iowa still near top for locking up blacks, study says

[Charly Haley](#), chaley@dmreg.com Published 7:30 p.m. CT June 15, 2016



(Photo: The Register)
CONNECTTWEETLINKEDINCOMMENTEMAILMORE

Iowa once again ranks among the worst states for locking up disproportionate numbers of African-Americans, with blacks imprisoned at 11 times the rate of whites, a recent study shows.

The study, released this week by Washington, D.C.-based [The Sentencing Project](#), gave Iowa low marks in multiple measurements for incarcerating large shares of blacks compared with whites.

But the state's rankings improved enough to drop it out of the No. 1 spot it occupied in 2007, when Iowa incarcerated black people at 13 times the rate of white people. At the time, it was the highest rate in the nation.

"We are glad to see a drop in the incarceration disparity," said Betty Andrews, president of Iowa-Nebraska NAACP, adding that the slight decrease is evidence of Iowa's hard work responding to the "embarrassing" ranking in 2007.

But Andrews and other local advocates say there is still a lot of work to do.

"We should be one of the lowest states" in the study's rankings, state legislator Ako Abdul-Samad said.

Although only 3.1 percent of Iowa's population is African-American, 25.8 percent of the state's prison inmates are black, according to 2014 statistics in The Sentencing Project's study.

"That's criminal in itself," Abdul-Samad said.

According to this year's study, Iowa ranks third for disproportionately locking up African-Americans, with blacks 11.1 times more likely to be incarcerated than whites, based on the state's population.

Iowa also has the country's fourth-highest incarceration rate for blacks, according to this year's study, with 2,349 of every 100,000 black residents incarcerated, compared with 211 per 100,000 whites and 361 per 100,000 Hispanics.

When Andrews saw Iowa's poor showing in the 2007 Sentencing Project study, she pushed for a committee of the Iowa-Nebraska NAACP dedicated to criminal justice reform, she said.

Similarly, the NAACP and other groups have worked with the governor's office, law enforcement officials and other local and state leaders to raise awareness through different initiatives, Andrews said. The NAACP also has worked to provide training to law enforcement and judiciary officials across the state, she said.

Andrews pointed out that this year's study shows slight improvement across the U.S. For example, the study shows the state with the highest incarceration disparity, New Jersey, sees black people incarcerated 12 times the rate of white people, which is lower than Iowa's rate in 2007.

"No state is as high as Iowa once was," she said.

Still, advocates say there is more work to be done. And one place to look is [likely the state's mandatory minimum sentencing laws](#), officials have said.

In a 2013 report, members of Iowa's Public Safety Advisory Board wrote that reducing the racial disparity "in Iowa's prison system will be extremely difficult, absent some modifications" of mandatory minimum sentences.

For three straight years, the Public Safety Advisory Board has recommended that the Iowa Legislature ease minimum sentencing mandates for first- and second-degree robbery.

A Des Moines Register [review in April](#) showed that Iowa had the most restrictive sentencing guidelines among 11 Midwestern states for robbery charges, and, during a four-decade period, 42 percent of Iowa inmates serving prison time for robbery were black.

Abdul-Samad said Iowa should also address the problem through education, offering more resources to help boost [graduation rates among black students](#), who drop out of high school at a disproportionate rate compared with white students.

"We have to begin to deal with systemic change" to reduce Iowa's incarceration rates, he said.

Abdul-Samad said he believes Iowa can improve its racial disparity in prisons if the problem is approached several ways.

"It's something that we can change," he said. "It's doable for us to reverse this trend."

<https://www.desmoinesregister.com/story/news/crime-and-courts/2016/06/15/iowa-still-near-top-locking-up-blacks-study-says/85936006/>

AQuESTT Classification System

12/3/2015

The following business rules are used to calculate AQuESTT school/district classifications for accountability. The data used is collected from NeSA assessments and NSSRS data submitted by districts.

- i. Every eligible public school and district is included and held accountable. The same process is used to classify districts and schools into four rating levels: Excellent (4), Great (3), Good (2), or Needs Improvement (1).
 - a. A school or district's overall classification rating is a combination of ratings in six areas (Status, Improvement, Growth, Graduation, Non-Proficiency, and Participation). The rules for combining these areas into the overall ratings are defined throughout this document.
 - b. Starting with the list of all Nebraska schools for the current school year as collected in the NSSRS system, these school buildings will be excluded from eligibility:
 - i. All schools with a *District Type* other than Public; such as Interim, State Operated, ESU, Non-Public, etc.
 - ii. Schools that are wholly SPED or Prekindergarten programs (*Kind of School* codes 16 or 20, or *High Grade Level* code "PK")
 - iii. Schools that are wholly Alternative programs (*Type of School* code "NA")
 - iv. Note: any otherwise eligible school that contains any grade levels between Kindergarten and 3rd, and therefore may not have NeSA assessments, is still included in the Classification process as an elementary school. The school's Status rating is copied from their district's Status rating as detailed later in this document.
 - c. The list of eligible districts is defined by selecting all districts that contain at least one eligible school after taking into account the above rules.
 - d. School ratings will be set per school building and school type (elementary, middle, high), so a single school building may have two or three "schools" as defined in this process.
 - i. The school buildings have been split into schools according to their preference and these AYP rules. Please refer to NDE's internal Federal Accountability Adequate Yearly Progress (AYP) Manual – Version 17.0.0 – June 08, 2014 document.
 - ii. Accordingly, the grade levels that constitute the elementary, middle, or high schools are customized for each school building and school year. The resulting elementary/middle/high school divisions have been prepared before the Classification process begins.
 - iii. Whenever the Classification process references previous school years' data, the E/M/H division logic for the corresponding years will be used rather than only using the current year's logic.

- ii. **Status (Initial Rating of 4, 3, 2 or 1) – Current Year NeSA Performance:** For each eligible district and school as defined above, a Status rating will be determined based on the average NeSA score in the district/school for the current school year.
- a. Scores from all four NeSA subjects (reading, mathematics, science and writing) at the district/school will be combined.
 - i. Reading, math and science assessments are scored on a 0-200 point scale, while Writing is scored from 0-70 points.
 - ii. In order to combine all four subjects into a single average, the Writing scores will be scaled up to a 200 point maximum by using a linear regression based on the NeSA Below/Exceeds Expectations cutoff scores for each grade level that takes the writing assessment.
 1. These cut scores are used in the regression formulas:
 RMS cuts: 85, 135
 Grade 4 writing cuts: 40, 57
 Grade 8 writing cuts: 40, 55
 Grade 11 writing cuts: 40, 53
 2. Example formula for 4th grade writing:
 Scale Adjust = $(135-85) / (57-40)$
 Intercept Adjust = $135 - (57 * \text{Scale Adjust})$
 Adjusted Score = $(\text{Score} * \text{Scale Adjust}) + \text{Intercept Adjust}$
 3. Any adjusted score that results in a negative number will be changed to zero instead.
 - b. For reference, this chart shows which grade levels participate in NeSA assessments by subject, as well as in which school year each subject's assessments were first available for use in Classification:

Subject	Participating Grade Levels							First School Year Subject Available
	3	4	5	6	7	8	11	
Reading	x	x	x	x	x	x	x	2009-2010
Math	x	x	x	x	x	x	x	2010-2011
Science			x			x	x	2011-2012
Writing		x				x	x	2011-2012*

- i. *Due to a change in the NeSA writing assessment format, writing scores from before the 2011-2012 school year will be excluded. Similarly, the 4th grade writing scores in 2011-2012 will be excluded as well (other grade levels in that school year are valid).
 - ii. Due to formatting issues with the NeSA writing assessment, 8th and 11th grade writing scores from the 2012-2013 and 2013-2014 school years will be excluded.
- c. A NeSA assessment score will be excluded from counting towards a school's average if the student has not been enrolled at the school for the full academic

year (enrolled continuously from the last day of September through their school's NeSA testing date in the spring).

- i. Similarly, a score will be excluded from a district's average if the student has not been enrolled within the district for the full academic year. However, the student may still count if they moved between schools within a district during the year.
- d. A NeSA assessment score will also be excluded from counting towards the average if it is marked with a valid *Reason Not Tested* in regards to Performance calculations, as defined by this SOSR guidance document:
http://www.education.ne.gov/assessment/pdfs/SOSR_Guidance-NeSA-RMSW_%20Calculations_%208.1.14.pdf
 - i. Note that the rules for valid *Reason Not Tested* codes vary depending on the school year, NeSA subject, and whether you are calculating Performance scores or Participation rates.
 - ii. If an assessment has a *Reason Not Tested* value other than those on the approved list above, its score of 0 will count towards the school/district average.
 - iii. A school must have a minimum of 25 eligible assessment scores to calculate a Status rating. If a school doesn't have 25 assessments, or does not contain any grade levels that participate in NeSA assessments, their district's Status rating will be assigned as their school Status rating.
- e. A school's average NeSA score is calculated by finding the sum of the eligible assessment scores at the school, divided by the number of eligible assessments. This average is then compared against the cut scores for the corresponding school type in order to determine the school's initial Status rating:

Elementary

- Level 4: Average NeSA Score > 132
- Level 3: Average NeSA Score > 114 but ≤ 132
- Level 2: Average NeSA Score > 96.5 but ≤ 114
- Level 1: Average NeSA Score ≤ 96.5

Middle School

- Level 4: Average NeSA Score > 129.5
- Level 3: Average NeSA Score > 113.5 but ≤ 129.5
- Level 2: Average NeSA Score > 96.8 but ≤ 113.5
- Level 1: Average NeSA Score ≤ 96.8

High School

- Level 4: Average NeSA Score > 129
- Level 3: Average NeSA Score > 112 but ≤ 129
- Level 2: Average NeSA Score > 95 but ≤ 112
- Level 1: Average NeSA Score ≤ 95

- f. The district's average NeSA score is calculated by finding the sum of the applicable assessment scores at all eligible schools in the district, divided by the number of applicable assessments at those same schools. This district average is then compared against the district cut scores listed below to determine the district's Status rating of 4, 3, 2, or 1:

District

Level 4: Average NeSA Score > 130.1667

Level 3: Average NeSA Score > 113.1667 but ≤ 130.1667

Level 2: Average NeSA Score > 96.1 but ≤ 113.1667

Level 1: Average NeSA Score ≤ 96.1

iii. **Improvement (+1 or 0 Rating Adjustment) – 3-Year NeSA Performance**

Trend: For each school/district an adjustment to the rating generated in the Status area may be made based on an upward trend in average NeSA scores in the school/district across all subjects for the last three school years. This adjustment can reward schools that are generally improving their NeSA scores across all students.

- a. The trend for Improvement at a school/district is determined by calculating a linear regression for available average NeSA scores across three years using all available subjects and grade levels, this being equivalent to the score used in the Status rating.
- i. Details about the linear regression formula used can be found in this document – [AQuESTT Linear Regression Calculations.pdf](#):



AQuESTT Linear
Regression Calculatio

- ii. As in the Status area, for each school year used in the trend calculation: assessment scores from students that weren't enrolled for the full academic year in the corresponding school year(s) will be excluded from this calculation as well as the previously mentioned writing assessment scores.
- iii. Unlike Status, all assessments with a score of 0 will be excluded from Improvement calculations, regardless of the *Reason Not Tested*.
- b. A minimum of 25 eligible assessment scores are required for any of the three school years included in the calculation. A school year may be available to be used in the trend line calculation independently of the other two school years.
- i. If a school/district has only two years of score data the equivalent of the linear regression slope calculation can still be performed.
- ii. If a school/district has only a single year for score data, then the slope will be 0 and the Improvement rating adjustment will be 0.
- c. If the slope of the trend line (representing the change in average NeSA scores per year) is greater than or equal to the calculated cut score for the

corresponding school/district, then the school/district overall rating is increased by one, otherwise it is unchanged.

- i. The cut scores for the Improvement rating adjustment use a formula that is based on the number of eligible assessments available for each school/district. The cut score is not represented by a single value, but by slope and intercept values that describe a cut score line for each school type. For each school/district: the count of all Improvement-eligible assessments in the current year, across all four subjects, is multiplied by the given slope value and the result is added to the intercept value to create this school/district's specific Improvement cut score.

Elementary

Cut score line slope: -0.003164845

Cut score line intercept: 10.57234

Middle School

Cut score line slope: -0.001393162

Cut score line intercept: 9.768585

High School

Cut score line slope: -0.001646391

Cut score line intercept: 11.91494

District

Cut score line slope: 0

Cut score line intercept: 9.778745

- iv. **Growth (+1 or 0 Rating Adjustment) – Rate of Individual Student NeSA Improvements:** For each district/school an adjustment to the rating may be made based on the percent of NeSA assessment scores that showed improvement compared to the same individuals' performance in the previous year.
 - a. Only reading and math scores will be used in Growth rate calculations, since science and writing assessments are not taken in consecutive grades.
 - i. Each individual student may be counted up to two times in the Growth percentage, one for math and one for reading.
 - b. Each district/school will calculate a Growth rate, which is the percentage of Growth-eligible assessment scores that showed an improvement (as defined in the table below) compared to the performance level/score in the previous year for that same student and subject area.
 - i. Since the Growth calculation uses data from individual students across multiple years, it will attempt to match the current Student ID against any retired IDs for the same student.

- ii. Any scores from students that were not enrolled for the full academic year in the current school year are excluded from the Growth rate calculation. This is not checked for in the previous year however.
 - 1. School Growth scores require a full academic year at that particular school, while district Growth scores only require a full academic year in the district. Students that move between schools within the same district during the school year are still eligible for district Growth.
- iii. Unlike Status calculations, an assessment will be excluded from the Growth rate if it has a score of 0 in the current year, regardless of the *Reason Not Tested*.
- iv. Any student that didn't have an assessment score in the previous year for the corresponding NeSA subject areas, or that had a score of 0 for any reason, is excluded from the Growth rate.
 - 1. Because of this rule and the grade levels that participate in NeSA assessments, all 3rd and 11th graders are excluded. This also means that all high schools are excluded from receiving an adjustment for Growth.
- v. For both school and district Growth calculations, if a student's NeSA assessments were not located at a school within the same district in the previous year, any school scores for that student are excluded.
- vi. A school/district must have a minimum of 25 growth-eligible assessment scores to take part in the growth calculation.
- c. For all Growth-eligible NeSA assessments, the following table is used to determine whether or not that assessment is assigned a Growth point by comparing the current year NeSA performance level and score against the previous year for the same subject area. An "X" indicates when an assessment qualifies for a Growth point:

		Current Year				
		Performance Levels	Exceeds	Met		Not Met
Previous Year	Exceeds	X	-		-	
	Met	X	Score Gain < 0	Score Gain ≥ 0	-	
			-	X		
	Not Met	X	X		Score Gain ≤ 0	Score Gain > 0
-					X	

- d. The Growth is determined by finding the percentage of eligible assessments that qualify for a Growth point at each school/district. If that percentage is greater

than or equal to the calculated cut score, the school/district overall rating is increased by one, otherwise it is unchanged.

- i. The cut scores for the Growth rating adjustment use a formula that is based on the number of eligible assessments available for each school/district. The cut score is not represented by a single value, but by slope and intercept values that describe a cut score line for each school type. For each school/district: the count of all Growth-eligible assessments in the current year is multiplied by the given slope value and the result is added to the intercept value to create this school/district's specific Growth cut score.

Elementary

Cut score line slope: -0.003292874

Cut score line intercept: 85.63568

Middle School

Cut score line slope: 0.0003376768

Cut score line intercept: 76.97569

High School: N/A

District

Cut score line slope: 0

Cut score line intercept: 82.17609

- v. **Graduation (*Rating Limitation*) – Cohort Graduation Rates:** For each district/high school their four or seven year cohort graduation rate in the previous year (the school year used for Graduation data lags one year behind the NeSA data) defines the maximum possible overall classification rating.
 - a. The cohort graduation rates are the percentage of members in a cohort who graduated with a diploma. The preexisting rules that define a cohort can be reviewed here:
http://www.education.ne.gov/nssrs/docs/Guidance_for_Graduation_Cohort_4_0_0.pdf
 - b. The graduation rate will be determined using the set of district-corrected data that is used for AYP calculations.
 - c. Only high schools are eligible, other schools will not have their overall rating affected. All districts are eligible.
 - d. A school or district cohort must have at least 25 members for it to be used in the Graduation rating.
 - i. If a cohort doesn't have 25 members, the previous year's counts for the matching cohort year (four or seven) can be added – i.e. for the 2013-2014 classification rating, if the 2012-2013 seven year cohort only has 18 members, the 2011-2012 seven year cohort can be added to it.

- ii. If either cohort is still lacking enough members, the 2nd prior year can be added as well, but no more than that.
- e. The greater of the eligible four or seven year cohort rate in the current year will be used for determining the Graduation rating limitation.
 - i. If neither cohort at a school/district has at least 25 members, then the school/district will not have a Graduation limit placed on it.
- f. The Graduation rating limitation is determined by comparing the highest cohort rate against these cut rates, which will limit the school/district overall classification rating:

No limitation: graduation rate $\geq 90\%$
 Limit rating to 3: graduation rate $< 90\%$ and $\geq 80\%$
 Limit rating to 2: graduation rate $< 80\%$ and $\geq 70\%$
 Limit rating to 1: graduation rate $< 70\%$

- vi. **Non-Proficiency (+1, 0, or -1 Rating Adjustment) – 3-Year NeSA Non-Proficiency Trend:** For each district/school an adjustment to the overall classification rating may be made based on a decreasing or increasing three year trend of the percentage of NeSA assessment scores that are defined as non-proficient according to the yearly NeSA score cutoffs determined by the assessments team.
 - a. The non-proficiency rate uses only reading and math scores from the set of assessments used in the Status calculation earlier.
 - i. As in the Status area, for each school year used in the trend calculation: assessment scores from students that weren't enrolled for the full academic year in the corresponding school year(s) will be excluded from this calculation as well as the previously mentioned writing assessment scores.
 - ii. Unlike Status, all assessments with a score of 0 will be excluded from Non-Proficiency calculations, regardless of the *Reason Not Tested*.
 - b. The non-proficient rate is calculated by dividing the number of reading/math assessments with scores in the Below Expectations range by the total number of reading/math assessments. This rate is calculated for the current year as well as the two previous years for each school/district, and this data will be combined into non-proficiency trend lines using linear regressions.
 - i. The linear regression will be performed using the same formula detailed in the Improvement area above.
 - ii. A minimum of 25 eligible assessment scores are required for any of the three school years included in the calculation. A school year may be available to be used in the trend line calculation independently of the other two school years.
 - iii. If a school/district has only two years of score data, the equivalent of the linear regression can still be performed.

- iv. If a school/district has only the current year for score data, then the slope will be 0 and the Non-Proficiency rating adjustment will be 0.
- c. The slope of the Non-Proficiency rate trend line is compared against the calculated cut scores as describe below. This determines the school/district Non-Proficient rating adjustment.
 - i. The cut scores for the Non-Proficiency rating adjustment use a formula that is based on the number of eligible assessments available for each school/district. The cut score is not represented by individual values, but by slope and intercept values that describe two cut score lines for each school type. For each school/district: the count of all Non-Proficiency-eligible assessments in the current year is multiplied by the given slope value and the result is added to the intercept value to create this school/district's specific Non-Proficiency cut scores.

Elementary

+1 adjustment: cut score line slope: 0.004615919

+1 adjustment: cut score line intercept: -11.5498

-1 adjustment: cut score line slope: -0.004971438

-1 adjustment: cut score line intercept: 8.073698

Middle School

+1 adjustment: cut score line slope: 0.0004769387

+1 adjustment: cut score line intercept: -8.284611

-1 adjustment: cut score line slope: -0.002725164

-1 adjustment: cut score line intercept: 8.591097

High School

+1 adjustment: cut score line slope: 0.004569985

+1 adjustment: cut score line intercept: -11.64624

-1 adjustment: cut score line slope: -0.00787609

-1 adjustment: cut score line intercept: 9.396319

District

+1 adjustment: cut score line slope: 0

+1 adjustment: cut score line intercept: -9.782147

-1 adjustment: cut score line slope: 0

-1 adjustment: cut score line intercept: 7.182314

- vii. **Participation (0, -1, or -2 Rating Adjustment/Rating Limitation) – Current Year NeSA Participation Rate:** For each school/district an adjustment or limitation

to the overall classification rating may be made based on the NeSA assessment participation rate.

- a. For all subjects and grade levels, the participation rate is defined as the percentage of eligible assessments with scores (completed assessments) compared to the total number of eligible assessments.
 - i. A score will be excluded from the participation rate if it is marked with a valid *Reason Not Tested* for the current school year in regards to Participation calculations. Note that this is a different set of reasons than those used for performance calculations, again refer to this document for details: http://www.education.ne.gov/assessment/pdfs/SOSR_Guidance-NeSA-RMSW_%20Calculations_%208.1.14.pdf
 - ii. If a writing assessment does not have an excused *Reason Not Tested* but has a *Not Scorable Code* of “B” or “R” (indicating that the student left the test blank or indicated they would not create a response) then that assessment will be marked as non-participating.
 - iii. A student does not have to be enrolled for a full academic year to be counted in the participation rate.
 - iv. Due to a change in the NeSA writing assessment format, writing scores from before the 2011-2012 school year will be excluded. Similarly, the 4th grade writing scores in 2011-2012 will be excluded as well (other grade levels in that school year are valid).
 - v. Due to formatting issues with the NeSA writing assessment, 8th and 11th grade writing scores from the 2012-2013 and 2013-2014 school years will be excluded.
 - vi. A school/district must have a minimum of 25 eligible assessment scores to take part in the growth calculation.
- b. The current year’s participation rate is compared to these cut rates to determine if the school/district receives a rating adjustment or a rating limitation:

-1 rating adjustment: Participation rate < 95%

-2 rating adjustment: Participation rate < 90%

Limit rating to 1: Participation rate < 85%

viii. **Raw Classification (4, 3, 2, or 1):** Each district and school receives a raw rating.

- a. The first step to determining the raw rating is to add or subtract any rating adjustments (Improvement, Growth, Non-Proficiency, Participation) from the initial Status rating.
 - i. During the adjustment calculations it is acceptable to go above the highest rating of 4. If a school/district is above 4 at the end of the formula then it will be reset to 4. For example: if a school has a Status rating of 4, has an Improvement adjustment of +1, and a Participation adjustment of -2, their overall rating will be 3.
 - ii. If the adjustments result in a rating less than 1, it will be reset to 1.

- b. After all adjustments have been calculated for each school/district, the lower of the two possible rating limitations (Graduation, Participation) will be applied when applicable.

ix. **Final Classification (4, 3, 2, or 1):** Each district and school receives an overall final classification.

- a. The final classification is based on the school/district's raw classification described above. The final classification can then be raised one level above the raw classification if the school or district receives an Evidence-Based Analysis (EBA) adjustment. Refer to the Resources page on AQuESTT.com for examples of the school and district EBA contents.
 - i. EBA adjustments do not apply to District classifications.
 - ii. The EBA adjustment does not apply to schools that are already classified as Excellent (4) in the raw classification.
 - iii. Each school/district is assigned a total EBA response score that combines the responses of the 5 "policies, practices, and procedures" questions in each of the 6 tenets. A response of "Never" is worth 0 points, "Seldom" is worth 1 point, "Sometimes" is worth 2 points, and "Usually" is worth 3 points. This results in a maximum score of 90 points for each school/district.
 - 1. If a school/district were to not submit an EBA, their score would be 0.
 - iv. For a school to receive an EBA adjustment, their total response score must be in the top percentile amongst the other schools that share their raw classification. The percentiles needed to be considered for an EBA adjustment for each raw classification level are:

Great (3): EBA score at the 95th percentile (88 points) or higher amongst schools classified as Great

Good (2): EBA score at the 90th percentile (84 points) or higher amongst schools classified as Good

Needs Improvement (1): EBA score at the 80th percentile (83 points) or higher amongst schools classified as Needs Improvement

- 1. Once the schools that have reached these target percentiles are identified, their EBA responses may be subject to audit and confirmation before an EBA Adjustment is assigned to them.

Revision Summary

8/17/2015

- ii.c. and ii.c.i. was changed to specify that district status ratings only require a full academic year in the district, no change for schools. This change also affects Improvement (iii.a.ii.) and Non-Proficiency (vi.a.i.) but no change to the text was required.
- A new section vii.a.ii. was added to indicate Not Scored codes that will include or exclude a Writing assessment in the Participation rate.

10/6/2015

- i.b.iv. was modified to clarify that all eligible schools with K-2 grade levels will receive an elementary school rating.
- iii.a.ii. was modified and iii.a.iii. was added to indicate that all NeSA assessments with a score of 0 are excluded from Improvement calculations, regardless of the *Reason Not Tested*.
- iv.b.iii. was modified to indicate that all NeSA assessments with a score of 0 in the current year are excluded from Growth calculations, regardless of the *Reason Not Tested*.
- vi.a.i. was modified and vi.a.ii. was added to indicate that all NeSA assessments with a score of 0 are excluded from Non-Proficiency calculations, regardless of the *Reason Not Tested*.

10/13/2015

- ii.e. and ii.f. were modified with new Status cut scores due to the adjustment to the distribution of schools and districts across the classification levels.
- iii.c. was modified to describe the new size-based cut score lines for Improvement rating adjustments.
- iv.d. was modified to describe the new size-based cut score lines for Growth rating adjustments.
- vi.c. was modified to describe the new size-based cut score lines for Non-Proficiency rating adjustments.

10/27/2015

- ii.e., ii.f., iii.c., iv.d., and vi.c. were modified with new District cut scores.

11/25/2015

- ix. was added to describe the final classification process.

12/3/2015

- ix.a.iv. was updated to include the specific 2015 cut scores

EMPLOYERS' DUTY TO ACCOMMODATE

**Ben
Humphrey
&
Tim
Reilly**

**October 22,
2015**

ACCOMMODATING A QUALIFIED DISABILITY

QUALIFIED EMPLOYEE

Is the disabled employee qualified?

➤ Two Prongs:

- 1) Requisite skill, education, experience, & training
- 2) Perform the **essential functions** of the job with or without reasonable accommodation

ESSENTIAL FUNCTIONS

Initial inquiry:

Whether the employer actually requires employees in the position to perform the functions that the employer asserts are essential.

ESSENTIAL FUNCTIONS

If the employee is required to perform the function, the next inquiry is:

Whether removing the function would fundamentally alter that position

ESSENTIAL FUNCTIONS

What are the essential functions of a job?

➤ **Factors:**

- 1) Whether the reason the position exists is to perform that function;
- 2) Whether a limited number of employees available among whom the performance of that job function can be distributed; and/or
- 3) Whether the function is highly specialized so that the incumbent in the position is hired for his or her expertise or ability to perform the particular function.

ESSENTIAL FUNCTIONS

Evidence to consider:

- 1) the employer's judgment as to which functions are essential
- 2) written job descriptions prepared before advertising or interviewing applicants for the job
- 3) the amount of time spent on the job performing the function
- 4) the consequences of not requiring the incumbent to perform the function
- 5) the terms of a collective bargaining agreement
- 6) the work experience of past incumbents in the job
- 7) the current work experience of incumbents in similar jobs

29 C.F.R § 1630.2(n)(3)

ACCOMMODATION REQUEST

If a qualified employee is unable to perform the essential job functions without a reasonable accommodation

- 1) Employee must request a reasonable accommodation
- 2) Proper employer response: initiate interactive process

INTERACTIVE PROCESS

When an individual with a disability has requested a reasonable accommodation to assist in the performance of a job, the employer, using a problem solving approach, should:

- 1) Analyze the particular job involved and determine its purpose and essential functions;**

29 C.F.R. Part 1630, Appendix (under the heading "Process of Determining the Appropriate Reasonable Accommodation").

INTERACTIVE PROCESS

When an individual with a disability has requested a reasonable accommodation to assist in the performance of a job, the employer, using a problem solving approach, should:

- 2) Consult with the individual with a disability to ascertain the precise job-related limitations imposed by the individual's disability and how those limitations could be overcome with a reasonable accommodation;**

29 C.F.R. Part 1630, Appendix (under the heading "Process of Determining the Appropriate Reasonable Accommodation")

INTERACTIVE PROCESS

This assessment will make it possible to ascertain the precise barrier to the employment opportunity which, in turn, will make it possible to determine the accommodation(s) that could alleviate or remove that barrier.

29 C.F.R. Pt. 1630, App. (under the heading "Process of Determining the Appropriate Reasonable Accommodation");
see also 29 C.F.R. § 1630.2(o)(3) (emphasis added).

INTERACTIVE PROCESS

- "This provision permits employers to make inquiries or require medical examinations (fitness for duty exams) when there is a need to determine whether an employee is still able to perform the essential functions of his or her job."
- "The provision permits employers or other covered entities to make inquiries or require medical examinations necessary to the reasonable accommodation process described in this part."

29 C.F.R. § 1630.14(c) App.

INTERACTIVE PROCESS

When an individual with a disability has requested a reasonable accommodation to assist in the performance of a job, the employer, using a problem solving approach, should:

- 3) In consultation with the individual to be accommodated, identify potential accommodations and assess the effectiveness each would have in enabling the individual to perform the essential functions of the position**

29 C.F.R. Part 1630, Appendix (under the heading "Process of Determining the Appropriate Reasonable Accommodation").

INTERACTIVE PROCESS

When an individual with a disability has requested a reasonable accommodation to assist in the performance of a job, the employer, using a problem solving approach, should:

- 4) Consider the preference of the individual to be accommodated and select and implement the accommodation that is most appropriate for both the employee and the employer.**

29 C.F.R. Part 1630, Appendix (under the heading "Process of Determining the Appropriate Reasonable Accommodation").

REASONABLE ACCOMMODATION

- An employer need not agree to the reasonable accommodation preferred by an employee.
- An employee need not accept a proposed reasonable accommodation by the employer.
- An employee's rejection of a proposed reasonable accommodation may render the employee unqualified.

29 C.F.R. § 1630.9(d)

Sturgill v. United Parcel Service, Inc.
215 F.3d 1024, 1031 (8th Cir. 2008).

INTERACTIVE PROCESS

Two-Way Street:

“The appropriate reasonable accommodation is best determined through a flexible, interactive process that involves *both* the employer and the individual with a disability.”

29 C.F.R. Pt. 1630, App. (under the heading “Process of Determining the Appropriate Reasonable Accommodation”) (emphasis added).

“Both parties, not just the employer, have an obligation to participate in the interactive process.”

Magnussen v. Casey's Marketing, Co., 787 F.Supp.2d 929, 956-57 (N.D. Iowa 2011) (citing *Kratzer v. Rockwell Collins, Inc.*, 398 F.3d 1040, 1045 (8th Cir. 2005), and *EEOC v. Convergys Customer Mgmt. Group, Inc.*, 491 F.3d 790, 796 (8th Cir. 2007)).

GOOD FAITH: EMPLOYEE

An employee's failure to participate in good faith in the interactive process may bar him or her from asserting a failure-to-accommodate claim under the ADA.

Magnussen, 787 F.Supp.2d at 956-57 (citing *Kratzer*, 398 F.3d at 1045, and *Convergys Customer Mgmt. Group, Inc.*, 491 F.3d at 796).

GOOD FAITH: EMPLOYEE

One way an employee might fail to meet his or her obligation to participate in the interactive process is by refusing to provide the employer information necessary for the fashioning of a reasonable accommodation.

Magnussen, 787 F.Supp.2d at 956-57(citing *Kratzer*, 398 F.3d at 1045, and *Convergys Customer Mgmt. Group, Inc.*, 491 F.3d at 796).

GOOD FAITH

“...[F]or purposes of summary judgment, the failure of an employer to engage in an interactive process to determine whether reasonable accommodations are possible is prima facie evidence that the employer may be acting in bad faith.”

Fjellestad v. Pizza Hut of Am., Inc., 188 F.3d 944, 952 (8th Cir. 1999).

GOOD FAITH

To establish liability for failure to engage in the interactive process, Complainant must show:

- 1. The employer knew about the disability**
- 2. The employee requested accommodations for the disability**
- 3. The employer did not make a good faith effort**
- 4. The employee could have been accommodated but for the employer's lack of good faith**

STATE DATA
CENTER OF
IOWA - A
PROGRAM OF
THE STATE
LIBRARY OF
IOWA

AND

THE OFFICE
OF PERSONS
WITH
DISABILITIES

IOWANS WITH DISABILITIES: 2017

JULY 2017

On July 26, 1990, President George H.W. Bush signed into law the Americans with Disabilities Act, guaranteeing equal opportunity for people with disabilities in public accommodations, commercial facilities, employment, transportation, state and local government services and telecommunications.

368,036

The number of people in Iowa in 2015 who have some kind of disability. They represent 11.9% of the civilian, noninstitutionalized population.

32.7%

Percentage of people 65 and older in 2015 with a disability, the highest of any age group.

31,589

Number of children under 18 in 2015 who have disabilities. This amounts to 4.3% of the population under 18 years of age.

180,139

The number of people aged 18-64 with a disability in 2015 or 9.6% of the population aged 18-64.

12.1%

The percent of males in Iowa in 2015 with a disability. This compares to 11.8% of females.

42.6%

The percent of households receiving food stamps which have one or more persons with a disability in 2015.

59,992

The number of households receiving food stamps which have one or more persons with a disability in 2015.

9,666

Number of Iowa grandparents with a disability living with grandchildren under 18 in 2015.

37.7%

Percentage of above grandparents with a disability who are responsible for grandchildren.



Specific Disabilities

123,105

The number of Iowans in 2015 reporting an inability to hear conversations or a serious hearing loss.

6.1%

Percentage of population age 5 and over with an ambulatory disability in 2015.

63,497

The number of Iowans age 5 and over in 2015 who reported that a disability made it difficult to perform self-care activities such as dressing, bathing, or getting around inside the home.

109,360

The number of noninstitutionalized Iowans age 18 and over in 2015 who reported an independent living disability that made it difficult to go outside the home alone to shop or visit a doctor's office.

57,891

The number of Iowans of any age in 2015 who reported a disability of blindness or serious difficulty seeing even when wearing contacts or glasses.

132,818

Number of people with limitations in cognitive functioning or who have a mental or emotional illness that interferes with daily activities, including those with Alzheimer's disease and intellectual disabilities. This included people with one or more problems that interfere with daily activities, such as frequently being depressed or anxious, trouble getting along with others, trouble concentrating and trouble coping with stress.

Veterans

56,109

Number of Iowa veterans in 2015 with a disability representing 29.1% of Iowa veterans.

36.7%

The percent of the veteran with population 18 to 64 years of age below the poverty level who have a disability.

52.3%

The percent of the veteran population 65 years and over below the poverty level in 2015 who have a disability.

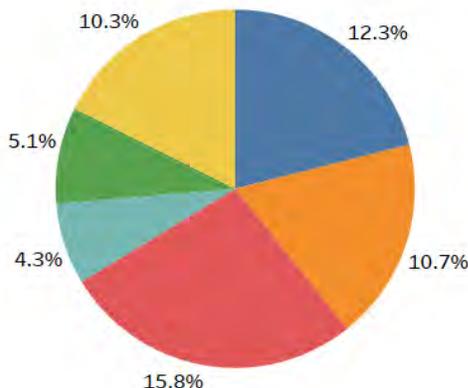
97.4%

Percent of transit buses nation-wide that were lift or ramp-equipped as of 2011.

Source:

http://www.rita.dot.gov/bts/sites/rita.dot.gov.vts/files/publications/national_transportation_statistics/html/table_01_08.html

Disability in Iowa by Race: 2015



- White alone
- Black or African American alone
- American Indian and Alaska Native alone
- Asian alone
- Some other race alone
- Two or more races



7.0

The percent of the population in 2015 with a disability in Iowa that was Hispanic or Latino



STATE DATA
CENTER OF
IOWA A
PROGRAM THE
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www.iowadatacenter.org



This program is supported by the Institute of Museum and Library Services under the provisions of the Library Services and Technology Act as administered by the State Library of Iowa.

OFFICES OF PERSONS WITH
DISABILITIES

Lucas State Office Building
Second Floor
321 E. 12th St
Des Moines, IA 50319
515-242-6334
jill.avery@iowa.gov
www.humanrights.iowa.gov

The data presented in this report are for the civilian noninstitutionalized population which excludes people in prisons, nursing homes, and active duty military

Data Source (unless otherwise noted) :
U.S. Census Bureau,
American Community Survey, 2015
Photos by the U.S. Census Bureau

Employment

50,180

The number of lowans age 18 to 64 with a disability who were employed in 2015 in a full-time status. 55.1% of lowans with a disability worked at least part-time.

9.6%

Percent of the labor force with a disability of some type.

9.6%

The unemployment rate in 2015 for lowans with a disability. The unemployment rate in Iowa at that time was 4.2%



78,222

The number of Iowa disabled workers in 2015 receiving benefits under Social Security's Old Age, Survivors, and Disability Insurance (OASDI) program.

Source:

http://www.socialsecurity.gov/policy/docs/factsheets/cong_stats/2015/ia.pdf

Health Insurance

97.5%

Percent of children under age 18 in Iowa that have a disability and are covered by insurance in 2015.

6.0%

Percent of lowans 18 to 64 years of age with a disability that had no health insurance coverage in 2015.

32.7%

The percent of lowans age 65 and over that have a disability and are covered by insurance in 2015.

356,277

The number of lowans with disabilities that have health insurance coverage in 2015. This is 96.8% of all persons with disabilities in Iowa.

Income and Poverty

\$19,607

Median earnings for lowans age 16 and over with disabilities with earnings in 2015. The median earnings for lowans age 16 and over without disabilities is \$30,964.

21.5%

The poverty rate for lowans with disabilities in 2015. The poverty rate for lowans without disabilities is 12.2%.

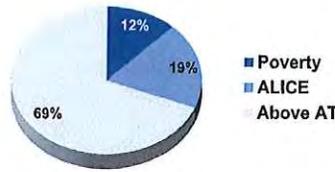
AT-A-GLANCE: IOWA

2014 Point-in-Time Data

Population: 3,107,126 | Number of Counties: 99 | Number of Households: 1,242,859
 Median Household Income (state average): \$53,712
 Unemployment Rate (state average): 4.4%
 Gini Coefficient (zero = equality; one = inequality) (state average): 0.44

How many households are struggling?

ALICE, an acronym for **A**sset **L**imited, **I**ncome **C**onstrained, **E**mloyed, are households that earn more than the U.S. poverty level, but less than the basic cost of living for the state (the ALICE Threshold). Combined, the number of poverty and ALICE households (31 percent) equals the total Iowa population struggling to afford basic needs.



Income Assessment for Iowa

The total annual income of poverty-level and ALICE households in Iowa is \$5.8 billion, which includes wages and Social Security. This is only 44 percent of the amount needed just to reach the ALICE Threshold of \$13.1 billion statewide. Government and nonprofit assistance makes up an additional 51 percent, or \$6.7 billion, but that still leaves an Unfilled Gap of 14 percent, or \$586 million.

ALICE Threshold	–	Earned Income and Assistance	=	Unfilled Gap
\$13.1 billion	–	\$12.5 billion	=	\$586 million

What does it cost to afford the basic necessities?

This bare-minimum Household Survival Budget does not allow for any savings, leaving a household vulnerable to unexpected expenses. Affording only a very modest living in each community, this budget is still significantly more than the U.S. poverty level of \$11,670 for a single adult and \$23,850 for a family of four.

Monthly Costs – Iowa Average – 2014			
	SINGLE ADULT	2 ADULTS, 1 INFANT, 1 PRESCHOOLER	PERCENT CHANGE, 2007–2014
Housing	\$422	\$623	12%
Child Care	\$-	\$745	10%
Food	\$176	\$533	20%
Transportation	\$351	\$702	8%
Health Care	\$147	\$587	43%
Miscellaneous	\$128	\$354	17%
Taxes	\$187	\$346	35%
Monthly Total	\$1,411	\$3,890	17%
ANNUAL TOTAL	\$16,932	\$46,680	17%
Hourly Wage	\$8.47	\$23.34	17%

Source: See Appendix C

AT A GLANCE: IOWA

AT-A-GLANCE: IOWA

2014 Point-in-Time Data

Population: 3,107,126 | Number of Counties: 99 | Number of Households: 1,242,859

Median Household Income (state average): \$53,712

Unemployment Rate (state average): 4.4%

Gini Coefficient (zero = equality; one = inequality) (state average): 0.44

Iowa Counties, 2014		
County	Total HH	% ALICE & Poverty
Adair	3,252	29%
Adams	1,735	29%
Allamakee	5,899	32%
Appanoose	5,447	39%
Audubon	2,703	29%
Benton	10,137	26%
Black Hawk	53,204	34%
Boone	10,619	28%
Bremer	9,296	27%
Buchanan	8,298	22%
Buena Vista	7,635	35%
Butler	6,222	26%
Calhoun	4,310	34%
Carroll	8,557	34%
Cass	6,074	31%
Cedar	7,639	23%
Cerro Gordo	19,864	30%
Cherokee	5,384	28%
Chickasaw	5,330	28%
Clarke	3,686	36%
Clay	7,269	28%
Clayton	7,698	30%
Clinton	19,977	33%
Crawford	6,371	35%
Dallas	27,718	21%
Davis	3,085	41%
Decatur	3,085	46%
Delaware	7,115	28%
Des Moines	16,881	38%
Dickinson	7,831	25%
Dubuque	38,824	28%
Emmet	4,150	34%
Fayette	8,470	31%
Floyd	6,923	34%
Franklin	4,321	31%
Fremont	3,003	29%
Greene	3,849	31%
Grundy	5,112	28%

Iowa Counties, 2014		
County	Total HH	% ALICE & Poverty
Guthrie	4,559	33%
Hamilton	6,354	35%
Hancock	4,629	25%
Hardin	6,997	29%
Harrison	5,959	33%
Henry	7,512	38%
Howard	3,917	32%
Humboldt	4,200	32%
Ida	3,124	27%
Iowa	6,705	23%
Jackson	8,494	32%
Jasper	14,658	30%
Jefferson	6,886	39%
Johnson	55,574	35%
Jones	8,235	25%
Keokuk	4,386	32%
Kossuth	6,628	28%
Lee	14,319	34%
Linn	88,216	24%
Louisa	4,386	31%
Lucas	3,745	38%
Lyon	4,495	28%
Madison	6,103	31%
Mahaska	9,084	31%
Marion	12,843	30%
Marshall	15,354	32%
Mills	5,348	26%
Mitchell	4,453	29%
Monona	3,972	36%
Monroe	3,280	34%
Montgomery	4,590	39%
Muscatine	16,301	33%
O'Brien	6,018	31%
Osceola	2,697	30%
Page	6,379	32%
Palo Alto	4,011	30%
Plymouth	9,899	25%
Pocahontas	3,222	32%

Iowa Counties, 2014		
County	Total HH	% ALICE & Poverty
Polk	179,188	29%
Pottawattamie	37,321	32%
Poweshiek	7,424	30%
Ringgold	2,078	37%
Sac	4,413	29%
Scott	67,822	27%
Shelby	5,171	31%
Sioux	11,782	27%
Story	35,880	42%
Tama	6,815	28%
Taylor	2,752	31%
Union	5,293	38%
Van Buren	2,986	29%
Wapello	14,608	39%
Warren	17,584	25%
Washington	9,056	24%
Wayne	2,548	40%
Webster	15,397	37%
Winnebago	4,584	31%
Winneshek	8,141	28%
Woodbury	38,898	42%
Worth	3,194	30%
Wright	5,419	35%

Sources: 2014 Point-in-Time Data: American Community Survey, 2014. ALICE Demographics: American Community Survey, 2014, and the ALICE Threshold, 2014. Income Assessment: Office of Management and Budget, 2015; Department of Treasury, 2016; American Community Survey, 2014; National Association of State Budget Officers, 2015; NCCS Data Web Report Builder, 2012; see Appendix E. Budget: U.S. Department of Housing and Urban Development (HUD); U.S. Department of Agriculture (USDA); Bureau of Labor Statistics (BLS); Internal Revenue Service (IRS) and Iowa Department of Revenue; Iowa Department of Human Services, 2014.

INTRODUCTION

Iowa is perhaps best known for being an agricultural-industry center – the site of some of the country's largest farms and host to the Iowa State Fair—as well as for being the first presidential caucus state in the nation.

Yet the idea of bounty that often describes farmland states can be deceptive in Iowa. Despite its agriculture and the strength of its advanced manufacturing, financial services, biotechnology, and green energy production industries, the Hawkeye state also contains disparities in wealth and income. What is often overlooked is the growing number of households that earn above the Federal Poverty Level (FPL), but are unable to afford the state's cost of living.

Traditional measures hide the reality that 31 percent of households in Iowa struggle to support themselves. Because income is distributed unequally in Iowa, there is both great wealth and significant economic hardship. That inequality increased by 13 percent from 1979 to 2014; now, the top 20 percent of Iowa's population earns 48 percent of all income earned in the state, while the bottom quintile earns only 4 percent (see Appendix A).

In 2014, Iowa's poverty rate of 12 percent was below the U.S. average of 15 percent and the median annual household income of \$53,712 was just slightly above the U.S. median of \$53,657. Yet, the state's overall economic situation is more complex. Iowa has outpaced the national economic recovery from the Great Recession (2007 to 2010). In particular, the state's Gross Domestic Product (GDP) fell by less than one percent through the Great Recession and unemployment has been lower than the national average; but labor force participation has fallen as well. Economic recovery has not benefited all of the state's workers to the same degree.

None of the economic measures traditionally used to calculate the financial status of Iowa's households, such as the FPL, consider the actual cost of living in each county in Iowa or the wage rate of jobs in the state. For that reason, those indices do not fully capture the number of households facing economic hardship across Iowa's 99 counties.

The term "ALICE" describes a household that is Asset Limited, Income Constrained, Employed. ALICE is a household with income above the FPL but below a basic survival threshold, defined here as the ALICE Threshold. Defying many stereotypes, ALICE households are working households, composed of women and men; young and old; urban, suburban, and rural; of all races and ethnicities. They live in every county in Iowa.

This United Way ALICE Report for Iowa provides better measures and language to describe the sector of Iowa's population that struggles to afford basic household necessities. It presents a more accurate picture of the economic reality in the state, especially regarding the number of households that are severely economically challenged.

The Report asks whether conditions have improved since the Great Recession, and whether families have been able to work their way above the ALICE Threshold. It includes a toolbox of ALICE measures that provide greater understanding of how and why so many families are still struggling financially. Some of the challenges Iowa faces are unique, while others are trends that have been unfolding nationally for at least three decades.

This Report is about far more than poverty; it reveals profound changes in the structure of Iowa's communities and jobs. It documents the increase in the basic cost of living, the decrease in the availability of jobs that can support household necessities, and the shortage of housing that workers in the majority of the state's jobs can afford.

"None of the economic measures traditionally used to calculate the financial status of Iowa's households, such as the FPL, consider the actual cost of living in each county in Iowa or the wage rate of jobs in the state."

“The ALICE measures show how many households in the state are struggling, and they provide the new language needed to discuss this segment of our community and the economic challenges that so many residents face.”

The findings are sobering: Though the impact of the Great Recession seemed relatively mild in Iowa, conditions were hard for ALICE households in the four years following the technical end of the Recession in 2010. In 2007, 28 percent of Iowa households had income below the ALICE Threshold, and that share increased to 29 percent in 2010. By 2014, 31 percent of Iowa households had income below the ALICE Threshold. In contrast, the official U.S. poverty rate in Iowa reports that in 2014, only 12 percent, or 148,239 households, were struggling. But the FPL was developed in 1965, its methodology has remained largely unchanged despite changes in the cost of living over time, and it is not adjusted to reflect cost of living differences across the country.

The ALICE measures show how many households in the state are struggling, and they provide the new language needed to discuss this segment of our community and the economic challenges that so many residents face. In Iowa, there are 233,027 ALICE households that have income above the FPL but below the ALICE Threshold. **When combined with households below the poverty level, in total, 381,266 households in Iowa –31 percent – struggled to support themselves in 2014.**

ALICE households are working households; they hold jobs, pay taxes, and provide services that are vital to the Iowa economy, in a variety of positions such as retail salespeople, truck drivers, food preparers, and office clerks. The core issue is that these jobs do not pay enough to afford the basics of housing, child care, food, health care, and transportation. Moreover, the growth of low-skilled jobs is projected to outpace that of medium- and high-skilled jobs into the next decade. At the same time, the cost of basic household necessities continues to rise. Given these projections, ALICE households will continue to make up a significant percentage of households in the state.

REPORT OVERVIEW

Who is struggling in Iowa?

Section I presents the **ALICE Threshold**: a realistic measure for income inadequacy in Iowa that takes into account the current cost of basic necessities and geographic variation. In Iowa there are 381,266 households – 31 percent of the state’s total – with income below the realistic cost of basic necessities; 148,239 of those households are living below the FPL and another 233,027 are ALICE households. This section provides a statistical picture of ALICE household demographics, including geography, age, race/ethnicity, gender, family type, disability, education, military service, and immigrant status. Except for a few notable exceptions, ALICE households generally reflect the demographics of the overall state population.

How costly is it to live in Iowa?

Section II details the average minimum costs for households in Iowa to simply survive – not to save or otherwise “get ahead.” It is well known that the cost of living in Iowa outpaces the state’s low average wages. The annual **Household Survival Budget** quantifies the costs of the five basic essentials of housing, child care, food, transportation, and health care. Using the thriftiest official standards, including those used by the U.S. Department of Agriculture (USDA) and the U.S. Department of Housing and Urban Development (HUD), the average annual Household Survival Budget for an Iowa family of four (two adults with one infant and one preschooler) is \$46,680 and for a single adult it is \$16,932. These numbers vary by county, but all highlight the inadequacy of the 2014 U.S. poverty designation of \$23,850 for a family and \$11,670 for a single adult as an economic survival standard in Iowa.

The Household Survival Budget is the basis for the ALICE Threshold, which redefines the basic economic survival standard for Iowa households. Section II also details a **Household Stability Budget**, which reaches beyond survival to budget for savings and stability at a modest level. Even at this level, it is more than double the Household Survival Budget for a family of four in Iowa.

Where does ALICE work? How much does ALICE earn and save?

Section III examines where members of ALICE households work, as well as the amount and types of assets these households have been able to accumulate. With more than 68 percent of jobs in Iowa paying less than \$20 per hour, it is not surprising that so many households fall below the ALICE Threshold. In addition, the housing and stock market crash associated with the Great Recession, as well as high unemployment, took a toll on household savings in the state. More than 22 percent of Iowa households are asset poor, and 26 percent do not have sufficient liquid net worth to subsist at the FPL for three months without income.

“With more than 68 percent of jobs in Iowa paying less than \$20 per hour, it is not surprising that so many households fall below the ALICE Threshold.”

How much income and assistance are necessary to reach the ALICE Threshold?

Section IV examines how much income is needed to enable Iowa households to afford the Household Survival Budget. This section also compares that level of income to how much households actually earn as well as the amount of public and private assistance they receive. The **ALICE Income Assessment** estimates that ALICE and poverty-level households in Iowa earn 44 percent of what is required to reach the ALICE Threshold. Resources from nonprofits and federal, state, and local governments contribute 14 percent, and health care spending adds another 37 percent. What remains is an Unfilled Gap of 5 percent for families below the ALICE Threshold to reach the basic economic survival standard that the Threshold represents.

What are the economic conditions for ALICE households in Iowa?

Section V presents the **Economic Viability Dashboard**, a measure of the conditions that Iowa’s ALICE households actually face. The Dashboard compares three indices—Housing Affordability, Job Opportunities, and Community Resources—across the state’s 99 counties. From 2007 to 2010, housing actually became more affordable and community resources increased. Job opportunities fell slightly from 2010 to 2012, but improved above 2007 levels by 2014. Housing affordability improved through 2012, but has fallen since. It remains difficult for ALICE households in Iowa to find both affordable housing and job opportunities in the same county.

What are the consequences of insufficient household income?

Section VI focuses on how households survive without sufficient income and assets to meet the ALICE Threshold. It outlines the difficult choices ALICE households face, such as forgoing preventative health care, accredited child care, healthy food, or car insurance. These choices threaten their health, safety, and future, and have consequences for their wider communities as well.

Conclusion

The Report concludes by outlining the structural issues that pose the greatest challenges to ALICE households going forward. These include changes in the age and diversity of Iowa's population, Iowa's prospects for both numbers and types of jobs in the coming decades, and ALICE's leverage at the ballot box. This section also identifies a range of general strategies that would reduce the number of Iowa households living below the ALICE Threshold.

DATA PARAMETERS

The ALICE measures presented in this Report are calculated for each county. Because Iowa is economically diverse across the state, state averages mask significant differences between counties. For example, the percent of households below the ALICE Threshold ranges from 21 percent in Dallas County to 46 percent in Decatur County.

The ALICE measures are calculated for 2007, 2010, 2012, and 2014 in order to compare the beginning and the end of the economic downturn known as the Great Recession and any progress made in the four years since the technical end of the Recession. The 2014 results will also serve as an important baseline from which to measure both the continuing recovery and the impact of the Affordable Care Act in the years ahead.

This Report examines issues surrounding ALICE households from different angles, trying to draw the clearest picture with the range of data available. The Report uses data from a variety of sources, including the American Community Survey, the U.S. Department of Housing and Urban Development (HUD), the U.S. Department of Agriculture (USDA), the Bureau of Labor Statistics at the U.S. Department of Labor (BLS), the Internal Revenue Service (IRS), Child Care Aware (formerly NACCRRRA), and these agencies' Iowa state counterparts. State, county, and municipal data is used to provide different lenses on ALICE households. The data are estimates; some are geographic averages, others are 1-, 3-, or 5-year averages depending on population size. Starting in 2014, 3-year averages are no longer produced by American Community Survey, so data for all communities with populations of less than 65,000 will be 5-year averages.

For the purposes of this Report, many percentages are rounded to whole numbers. In some cases, this may result in percentages totaling 99 or 101 percent instead of 100 percent.

“Because Iowa is economically diverse across the state, state averages mask significant differences between counties.”

Council Bluffs Housing complaints: January 2015 – Present (Dec. 6, 2017)

Case – Open/Closed	Complainant zip code	Type
1 – Closed	51501	Harassment, eviction Basis: Retaliation
2 – Closed	51501	Terms and Conditions Basis: Race
3 – Closed	51501	Reasonable Accommodation, terms and conditions, eviction Bases: Race, Disability, Retaliation
4 – Closed	51503	Reasonable Accommodation, terms and conditions Basis: Disability
5 – Closed	51501	Refusal to rent, reasonable accommodation, terms and conditions Basis: Disability
6 – Closed	51503	Reasonable Accommodation, terms and conditions Basis: Disability
7 – Closed	51501	Reasonable Accommodation, terms and conditions Basis: Disability
8 – Closed	51501	Reasonable Accommodation, terms and conditions Basis: Disability
9 – Open	51501	Reasonable Accommodation, terms and conditions, eviction Basis: Disability
10 – Open	51501	Refusal to rent, reasonable accommodation, terms and conditions Basis: Disability

Nebraska Fair Housing Act

Legislative Bill 825

Amended by Legislative Bill 361

Effective Date: September 6, 1991

Amended Effective Date: April 28, 2005

Article 3 - Housing

Section - Explanation

20-301 - Act, how cited.

20-302 - Civil rights; policy of state.

20-303 - Definitions, where found.

20-304 - Aggrieved person, defined.

20-305 - Commission, defined.

20-306 - Complainant, defined.

20-307 - Conciliation, defined.

20-308 - Conciliation agreement, defined.

20-309 - Discriminatory housing practice, defined.

20-310 - Dwelling, defined.

20-311 - Familial status, defined.

20-312 - Family, defined.

20-313 - Handicap, defined.

20-314 - Person, defined.

20-315 - Rent, defined.

20-316 - Respondent, defined.

20-317 - Restrictive covenant, defined.

20-318 - Unlawful acts enumerated.

20-319 - Handicapped person; discriminatory practices prohibited; design and construction standards; enforcement of act.

20-320 - Transaction related to residential real estate; discriminatory practices prohibited.

20-321 - Multiple listing service; other service, organization, or faculty; discriminatory practices prohibited.

20-322 - Religious organization, private home, private club, or housing for older persons; restricting use not prohibited; local restrictions; how treated; controlled substances; illegal activities; effect.

20-323 - Affirmative action required; cooperation with commission.

20-324 - Equal Opportunity Commission; educational and conciliatory activities; programs of compliance and enforcement.

20-325 - Commission; duties.

20-326 - Discriminatory housing practice; complaint; procedure; investigation.

20-327 - Complaint; conciliation; conciliation agreement; contents, restrictions.

20-328 - Final investigative report; contents; amendment.

20-329 - Conciliation agreement; breach; civil action authorized.

20-330 - Conciliation proceedings; investigations; restrictions on use of information.

20-331 - Temporary or preliminary relief; other proceedings; actions authorized.

20-332 - Complaint; referral to local agency; procedure; certification of local agency.

20-333 - Commission; discriminatory housing practice; determination; charge; contents; service; referral to Attorney General; dismissal of complaint.

20-334 - Commission; investigations; hearings; powers and duties; violation; penalty.

20-335 - Civil action in lieu of hearing; election authorized.

20-336 - Commission; hearings; hearing officer; appearance; discovery; discontinuance of proceedings; when.

20-337 - Hearing officer; powers and duties; civil penalties; order; effect.

20-338 - Finding, conclusion, or order; review; final order; service.

20-339 - Appeal; enforcement of hearing officer's order; procedure.

20-340 - Civil action in lieu of hearing; relief authorized.

20-341 - Attorney's fees and costs; when allowed.

20-342 - Statute of limitations; civil action; rights and duties of parties; remedies allowed; attorney's fees and costs.

20-343 - Attorney General; civil action; powers and duties; relief authorized; intervention; when permitted.

20-344 - Violations; penalty.

Section 20-301. Act, how cited.

Sections 20-301 to 20-344 shall be known and may be cited as the Nebraska Fair Housing Act.

Section 20-302. Civil rights; policy of state.

It is the policy of the State of Nebraska that there shall be no discrimination in the acquisition, ownership, possession, or enjoyment of housing throughout the State of Nebraska in accordance with Article I, section 25, of the Constitution of Nebraska.

Section 20-303. Definitions, where found.

For purpose of the Nebraska Fair Housing Act, the definitions found in sections 20-304 to 20-317 shall be used.

Section 20-304. Aggrieved person, defined.

Aggrieved person shall include any person who:

- (1) Claims to have been injured by a discriminatory housing practice; or
- (2) Believes that he or she will be injured by a discriminatory housing practice that is about to occur.

Section 20-305. Commission, defined.

Commission shall mean the Equal Opportunity Commission.

Section 20-306. Complainant, defined.

Complainant shall mean the person, including the commission, who files a complaint under section 20-326.

Section 20-307. Conciliation, defined.

Conciliation shall mean the attempted resolution of issues raised by a complaint or by the investigation of a complaint through informal negotiations involving the aggrieved person, the respondent, and the commission.

Section 20-308. Conciliation agreement, defined.

Conciliation agreement shall mean a written agreement setting forth the resolution of the issues in conciliation.

Section 20-309. Discriminatory housing practice, defined.

Discriminatory housing practice shall mean an act that is unlawful under section 20-318, 20-319, 20-320, 20-321, or 20-344.

Section 20-310. Dwelling, defined.

Dwelling shall mean any building, structure, or portion thereof which is occupied as or designed or intended for occupancy as a residence for one or more families and any vacant land which is offered for sale or lease for the construction or location thereon of any such building, structure, or portion thereof.

Section 20-311. Familial status, defined.

Familial status shall mean one or more minors being domiciled with:

- (1) A parent or another person having legal custody of such individual; or
- (2) The designee of a parent or other person having legal custody, with the written permission of the parent or other person.

The protections afforded against discrimination on the basis of familial status shall apply to any person who is pregnant or is in the process of securing legal custody of any minor.

Section 20-312. Family, defined.

Family shall include a single individual.

Section 20-313. Handicap, defined.

Handicap shall mean, with respect to a person:

- (1) A physical or mental impairment which substantially limits one or more of such person's major life activities;
- (2) A record of having such an impairment; or
- (3) Being regarded as having such an impairment.

Handicap shall not include current, illegal use of or addiction to a controlled substance as defined in section 28-401.

Section 20-314. Person, defined.

Person shall include one or more individuals, corporations, partnerships, associations, labor organizations, legal representatives, mutual companies, joint-stock companies, trusts, unincorporated organizations, trustees, trustees in bankruptcy, receivers, and fiduciaries.

Section 20-315. Rent, defined.

Rent shall include lease, sublease, let, and otherwise grant for consideration the right to occupy premises not owned by the occupant.

Section 20-316. Respondent, defined.

Respondent shall mean:

- (1) The person or other entity accused in a complaint of a discriminatory housing practice; and
- (2) Any other person or entity identified in the course of investigation and notified as required with respect to respondents so identified under section 20-326.

Section 20-317. Restrictive covenant, defined.

Restrictive covenant shall mean any specification limiting the transfer, rental, or lease of any housing because of race, creed, religion, color, national origin, sex, handicap, familial status, or ancestry.

Section 20-318. Unlawful acts enumerated.

Except as exempted by section 20-322, it shall be unlawful to:

(1) Refuse to sell or rent after the making of a bona fide offer, refuse to negotiate for the sale or rental of or otherwise make unavailable or deny, refuse to show, or refuse to receive and transmit an offer for a dwelling to any person because of race, color, religion, national origin, familial status, or sex;

(2) Discriminate against any person in the terms, conditions, or privileges of sale or rental of a dwelling or in the provision of services or facilities in connection therewith because of race, color, religion, national origin, familial status, or sex;

(3) Make, print, publish, or cause to be made, printed, or published any notice, statement, or advertisement with respect to the sale or rental of a dwelling that indicates any preference, limitation, or discrimination based on race, color, religion, national origin, handicap, familial status, or sex or an intention to make any such preference, limitation, or discrimination;

1. Represent to any person because of race, color, religion, national origin, handicap, familial status, or sex that any dwelling is not available for inspection, sale, or rental when such dwelling is in fact so available;

2. Cause to be made any written or oral inquiry or record concerning the race, color, religion, national origin, handicap, familial status, or sex of a person seeking to purchase, rent, or lease any housing;

3. Include in any transfer, sale, rental, or lease of housing any restrictive covenants or honor or exercise or attempt to honor or exercise any restrictive covenant pertaining to housing;

4. Discharge or demote an employee or agent or discriminate in the compensation of such employee or agent because of such employee's or agent's compliance with the Nebraska Fair Housing Act; and

5. Induce or attempt to induce, for profit, any person to sell or rent any dwelling by representations regarding the entry or prospective entry into the neighborhood of a person or persons of a particular race, color, religion, national origin, handicap, familial status, or sex.

Section 20-319. Handicapped person; discriminatory practices prohibited; design and construction standards; enforcement of act.

(1) Except as exempted by section 20-322, it shall be unlawful to:

(a) Discriminate in the sale or rental of or otherwise make unavailable or deny a dwelling to any buyer or renter because of a handicap of:

(i) The buyer or renter;

(ii) Any person associated with the buyer or renter; or

(iii) A person residing in or intending to reside in the dwelling after it is so sold, rented, or made available; or

(b) Discriminate against any person in the terms, conditions, or privileges of sale or rental of a dwelling or in the provision of services or facilities in connection with a dwelling because of a handicap of:

(i) Such person;

(ii) Any person associated with such person; or

(iii) A person residing in or intending to reside in the dwelling after it is so sold, rented, or made available.

(2) For purposes of this section, discrimination shall include:

(a) A refusal to permit, at the expense of the handicapped person, reasonable modifications of existing premises occupied or to be occupied by the person if the modifications may be necessary to afford the person full enjoyment of the premises, except that in the case of a rental, the landlord may, when it is reasonable to do so, condition permission for a modification on the renter agreeing to restore the interior of the premises to the condition that existed before the modification, reasonable wear and tear excepted.

(b) A refusal to make reasonable accommodations in rules, policies, practices, or services when such accommodations may be necessary to afford the handicapped person equal opportunity to use and enjoy a dwelling; and

(c) In connection with the design and construction of covered multifamily dwellings for first occupancy after September 1, 1991, a failure to design and construct the dwellings in such a manner that:

(i) The public use and common use portions of the dwellings are readily accessible to and usable by handicapped persons;

(ii) All the doors designed to allow passage into and within all premises within the dwellings are sufficiently wide to allow passage by handicapped persons in wheelchairs; and

(iii) All premises within the dwellings contain the following features of adaptive design:

- (A) An accessible route into and through the dwelling;
 - (B) Light switches, electrical outlets, thermostats, and other environmental controls in accessible locations;
 - (C) Reinforcements in bathroom walls to allow later installation of grab bars; and
 - (D) Kitchens and bathrooms such that a handicapped person in a wheelchair can maneuver about the space.
- (3) Compliance with the appropriate requirements of the American National Standards Institute standard for buildings and facilities providing accessibility and usability for physically handicapped people, ANSI A117.1, shall satisfy the requirements of subdivision (2)(c)(iii) of this section.
- (4) (a) If a political subdivision has incorporated into its laws the design and construction requirements set forth in subdivision (2)(c) of this section, compliance with such laws shall be deemed to satisfy the requirements.
- (b) A political subdivision may review and approve newly constructed covered multifamily dwellings for the purpose of making determinations as to whether the design and construction requirements are met.
- (c) The commission shall encourage but may not require political subdivisions to include in their existing procedures for the review and approval of newly constructed covered multifamily dwellings determinations as to whether the design and construction of the dwellings are consistent with the design and construction requirements and shall provide technical assistance to political subdivisions and other persons to implement the requirements.
- (d) Nothing in this section shall be construed to require the commission to review or approve the plans, designs, or construction of all covered multifamily dwellings to determine whether the design and construction of the dwellings are consistent with the design and construction requirements.
- (5) (a) Nothing in subsection (4) of this section shall be construed to affect the authority and responsibility of the commission or a local agency certified pursuant to section 20-332 to receive and process complaints or otherwise engage in enforcement activities under the Nebraska Fair Housing Act.
- (b) Determinations by the commission or a political subdivision under subdivision (4)(a) or (b) of this section shall not be conclusive in enforcement proceedings under the act.
- (6) For purposes of this section, covered multifamily dwellings shall mean:
- (a) Buildings consisting of four or more units if such buildings have one or more elevators; and

(b) Ground floor units in other buildings consisting of four or more units.

(7) Nothing in this section shall be construed to invalidate or limit any law of a political subdivision or other jurisdiction in which this section is effective that requires dwellings to be designed and constructed in a manner that affords handicapped persons greater access than is required by this section.

(8) Nothing in this section shall require that a dwelling be made available to an individual whose tenancy would constitute a direct threat to the health or safety of other individuals or whose tenancy would result in substantial physical damage to the property of others.

Section 20-320. Transaction related to residential real estate; discriminatory practices prohibited.

(1) It shall be unlawful for any person or other entity whose business includes engaging in transactions related to residential real estate to discriminate against any person in making available such a transaction or in the terms or conditions of such a transaction because of race, color, religion, sex, handicap, familial status, or national origin.

(2) For purposes of this section, transaction related to residential real estate shall mean any of the followings:

(a) The making or purchasing of loans or providing other financial assistance:

(i) For purchasing, constructing, improving, repairing, or maintaining a dwelling; or

(ii) Secured by residential real estate; or

(b) The selling, brokering, or appraising of residential real property.

(3) Nothing in this section shall prohibit a person engaged in the business of furnishing appraisals of real property from taking into consideration factors other than race, color, religion, national origin, sex, handicap, or familial status.

Section 20-321. Multiple listing service; other service, organization, or facility; discriminatory practices prohibited.

It shall be unlawful to deny any person access to or membership or participation in any multiple listing service, real estate brokers organization, or other service, organization, or facility relating to the business of selling or renting dwellings or to discriminate against any person in the terms or conditions or such access, membership, or participation on account of race, color, religion, national origin, handicap, familial status, or sex.

Section 20-322. Religious organization, private home, private club, or housing for older persons; restricting use not prohibited; local restrictions; how treated; controlled substances; illegal activities; effect.

(1) Nothing in the Nebraska Fair Housing Act shall prohibit a religious organization, association, or society or any nonprofit institution or organization operated, supervised, or controlled by or in conjunction with a religious organization, association, or society from limiting the sale, rental, or occupancy of a dwelling which it owns or operates for other than commercial purposes to persons of the same religion or from giving preferences to such persons unless membership in such religion is restricted on account of race, color, national origin, handicap, familial status, or sex.

(2) Nothing in the act shall prohibit a private club not in fact open to the public, which as an incident to its primary purpose or purposes provides lodgings which it owns or operates for other than commercial purposes, from limiting the rental or occupancy of such lodging to its members or from giving preference to its members.

(3) Nothing in the act shall prohibit or limit the right of any person or his or her authorized representative to refuse to rent a room or rooms in his or her own home for any reason or for no reason or to change tenants in his or her own home as often as desired, except that this exception shall not apply to any person who makes available for rental or occupancy more than four sleeping rooms to a person or family within his or her own home.

(4) (a) Nothing in the act shall limit the applicability of any reasonable local restrictions regarding the maximum number of occupants permitted to occupy a dwelling, and nothing in the act regarding familial status shall apply with respect to housing for older persons.

(b) For purposes of this subsection, housing for older persons shall mean housing:

(i) Provided under any state program that the commission determines is specifically designed and operated to assist elderly persons as defined in the program;

(ii) Intended for and solely occupied by persons sixty-two years of age or older; or

(iii) Intended and operated for occupancy by at least one person fifty-five years of age or older per unit. In determining whether housing qualifies as housing for older persons under this subdivision, the commission shall develop regulations which require at least the following factors:

(A) The existence of significant facilities and services specifically designed to meet the physical or social needs of older persons or, if the provision of such facilities and services is not practicable, that such housing is necessary to provide important housing opportunities for older persons;

(B) That at least eighty percent of the units are occupied by at least one person fifty-five years of age or older per unit; and

(C) The publication of and adherence to policies and procedures which demonstrate an intent by the owner or manager to provide housing for persons fifty-five years of age or older.

(c) Housing shall not fail to meet the requirements for housing for older persons by reason of:

(i) Persons residing in the housing as of September 6, 1991, who do not meet the age requirements of subdivision (b)(ii) or (iii) of this subsection if succeeding occupants of the housing meet the age requirements; or

(ii) Unoccupied units if the units are reserved for occupancy by persons who meet the age requirements.

(5) Nothing in the act shall prohibit conduct against a person because such person has been convicted by any court of competent jurisdiction of the illegal manufacture or distribution of a controlled substance as defined in section 28-401.

Section 20-323. Affirmative action required; cooperation with commission.

All executive departments, state agencies, and independent instrumentalities exercising essential public functions, including any state agency having regulatory or supervisory authority over financial institutions, shall administer their programs and activities relating to housing and urban development in a manner affirmatively to further the purposes of the Nebraska Fair Housing Act and shall cooperate with the commission to further such purposes.

Section 20-324. Equal Opportunity Commission; educational and conciliatory activities; programs of compliance and enforcement.

The commission shall conduct such educational and conciliatory activities as in the commission's judgment will further the purposes of the Nebraska Fair Housing Act. The commission shall call conferences of persons in the housing industry and other interested persons to acquaint them with the act and suggested means of implementing it and shall endeavor with their advice to work out programs of voluntary compliance and of enforcement. The commission shall consult with local officials and other interested parties to learn the extent, if any, to which housing discrimination exists in their locality and whether and how local enforcement programs might be utilized to combat such discrimination in connection with or in place of the commission's enforcement of the act. The commission shall issue reports on such conferences and consultations as it deems appropriate.

Section 20-325. Commission; duties.

The commission shall:

- (1) Make studies with respect to the nature and extent of discriminatory housing practices in representative urban, suburban, and rural communities throughout the state;
- (2) Publish and disseminate reports, recommendations, and information derived from such studies, including an annual report to the Legislature:
 - (a) Specifying the nature and extent of progress made statewide in eliminating discriminatory housing practices and furthering the purposes of the Nebraska Fair Housing Act, obstacles remaining to achieving equal housing opportunity, and recommendations for further legislative or executive action; and
 - (b) Containing tabulations of the number of instances and the reasons therefore in the preceding year in which:
 - (i) Investigations have not been completed as required by subdivision (1)(b) of section 20-326;
 - (ii) Determinations have not been made within the time specified in section 20-333; and
 - (iii) Hearings have not been commenced or findings and conclusions have not been made as required by section 20-337;
- (3) Cooperate with and render technical assistance to state, local, and other public or private agencies, organizations, and institutions which are formulating or carrying on programs to prevent or eliminate discriminatory housing practices;
- (4) Annually report to the Legislature and make available to the public data on the age, race, color, religion, national origin, handicap, familial status, and sex of persons and households who are applicants for, participants in, or beneficiaries or potential beneficiaries of programs administered by the commission. In order to develop the data to be included and made available to the public under this subdivision, the commission shall, without regard to any other provision of law, collect such information relating to those characteristics as the commission determines to be necessary or appropriate.
- (5) Adopt and promulgate rules and regulations, subject to the approval of the members of the commission, regarding the investigative and conciliation process that provide for testing standards, fundamental due process, and notice to the parties of their rights and responsibilities; and
- (6) Have authority to enter into agreements with the United States Department of Housing and Urban Development in cooperative agreements under the Fair Housing Assistance Program. The commission shall further have the authority to enter into agreements with testing organizations to

assist in investigative activities. The commission shall not enter into any agreements under which compensation to the testing organization is partially or wholly based on the number of conciliations, settlements, and reasonable cause determinations.

Section 20-326. Discriminatory housing practice; complaint; procedure; investigation.

(1)(a)(i) An aggrieved person may, not later than one year after an alleged discriminatory housing practice has occurred or terminated, file a complaint with the commission alleging such discriminatory housing practice. The commission, on its own initiative, may also file such a complaint.

(ii) The complaint shall be in writing and shall contain such information and be in such form as the commission requires.

(iii) The commission may also investigate housing practices to determine whether a complaint should be brought under this section.

(b) Upon the filing of a complaint:

(i) The commission shall serve notice upon the aggrieved person acknowledging such filing and advising the aggrieved person of the time limits and choice of forums provided under the Nebraska Fair Housing Act;

(ii) The commission shall, not later than ten days after such filing or the identification of an additional respondent under subsection (2) of this section, serve on the respondent a notice identifying the alleged discriminatory housing practice, and advising such respondent of the procedural rights and obligations of respondents under the act, together with a copy of the original complaint;

(iii) Each respondent may file, not later than ten days after receipt of notice from the commission, an answer to the complaint; and

(iv) Unless it is impracticable to do so, the commission shall investigate the alleged discriminatory housing practice and complete such investigation within one hundred days after the filing of the complaint or, when the commission takes further action under section 20-332 with respect to a complaint, within one hundred days after the commencement of such further action.

(c) If the commission is unable to complete the investigation within one hundred days after the filing of the complaint or after the commencement of such further action, the commission shall notify the complainant and respondent in writing of the reasons for not doing so.

(d) Complaints and answers shall be under oath and may be reasonably and fairly amended at any time.

(2)(a) A person who is not named as a respondent in a complaint but who is identified as a respondent in the course of investigation may be joined as an additional or substitute respondent upon written notice under subdivision (1)(b)(ii) of this section to such person from the commission.

(b) The notice shall explain the basis for the commission's belief that the person to whom the notice is addressed is properly joined as a respondent.

Section 20-327. Complaint; conciliation; conciliation agreement; contents, restrictions.

(1) During the period beginning with the filing of the complaint and ending with the issuance of a charge or a dismissal by the commission, the commission shall, to the extent feasible, engage in conciliation with respect to the complaint.

(2) A conciliation agreement shall be an agreement between the complainant and the respondent and shall be subject to the approval of the members of the commission, which approval may not be delegated.

(3) A conciliation agreement arising out of such conciliation shall be an agreement between the respondent and the complainant and shall be subject to approval by the commission.

(4) A conciliation agreement may provide for binding arbitration of the dispute arising from the complaint. Any such arbitration that results from a conciliation agreement may award appropriate relief, including monetary relief.

(5) Each conciliation agreement shall be made public unless the complainant and respondent otherwise agree and the commission determines that disclosure is not required to further the purposes of the Nebraska Fair Housing Act.

(6) A conciliation agreement between a respondent and complainant which has been approved by the commission shall not be deemed an adjudication that the respondent has committed a discriminatory housing practice nor shall the conciliation agreement be the subject of an order for relief under section 20-337, unless the conciliation agreement is entered after an adjudication pursuant to an administrative proceeding or a civil action pursuant to state or federal law in which the respondent was found to have committed a discriminatory housing practice.

Section 20-328. Final investigative report; contents; amendment.

(1) At the end of each investigation of a complaint, the commission shall prepare a final investigative report containing:

(a) The names and dates of contacts with witnesses;

- (b) A summary and the dates of correspondence and other contacts with the aggrieved person and the respondent;
 - (c) A summary description of other pertinent records;
 - (d) A summary of witness statements; and
 - (e) Answers to interrogatories.
- (2) A final investigative report may be amended if additional evidence is later discovered.

Section 20-329. Conciliation agreement; breach; civil action authorized.

Whenever the commission has reasonable cause to believe that a respondent has breached a conciliation agreement, the commission shall refer the matter to the Attorney General for filing of a civil action under section 20-343 for the enforcement of such agreement.

Section 20-330. Conciliation proceedings; investigations; restrictions on use of information.

- (1) Except as provided in subsection (5) of section 20-327, nothing said or done in the course of conciliation may be made public or used as evidence in a subsequent proceeding under the Nebraska Fair Housing Act without the written consent of the persons concerned. All records compiled in the course of conciliation activities shall be exempt from public release. The commission may release any fully executive conciliation agreement.
- (2) (a) Notwithstanding subsection (1) of this section, the commission shall make available to the aggrieved person and the respondent, upon request, following the completion of an investigation, information derived from an investigation and any final investigative report relating to that investigation.
- (b) The commission's release of information pursuant to subdivision (2)(a) of this section is subject to the federal Privacy Act of 1974, Public Law 93-579, as such act existed on January 1, 2005, and any other state or federal laws limiting the release of confidential information obtained in the course of an investigation under the Nebraska Fair Housing Act.
- (3) Notwithstanding subsections (1) and (2) of this section, materials in the investigative file shall be disclosed to the complainant and respondent to the extent reasonably necessary to further the investigation or conciliation discussions.

Section 20-331. Temporary or preliminary relief; other proceedings; actions authorized.

(1) If the commission concludes at any time following the filing of a complaint that prompt judicial action is necessary to carry out the purposes of the Nebraska Fair Housing Act, the commission may authorize a civil action for appropriate temporary or preliminary relief pending final disposition of the complaint under this section. Upon receipt of such an authorization, the Attorney General shall promptly commence and maintain such an action. Any temporary restraining order or other order granting preliminary or temporary relief shall be issued in accordance with sections 25-1062 to 25-1080. The commencement of a civil action under this section shall not affect the initiation or continuation of administrative proceedings under this section and section 20-336.

(2) Whenever the commission has reason to believe that a basis may exist for the commencement of proceedings against any respondent under subsection (1) or (3) of section 20-343 or for proceedings by any governmental licensing or supervisory authorities, the commission shall transmit the information upon which such belief is based to the Attorney General or to such authorities, as the case may be.

Section 20-332. Complaint; referral to local agency; procedure; certification of local agency.

(1) Whenever a complaint alleges a discriminatory housing practice (a) within the jurisdiction of a local agency in an incorporated city or a county and (b) as to which the agency has been certified by the commission under this section, the commission shall refer the complaint to that agency before taking any action with respect to the complaint.

(2) After a referral is made, the commission shall take no further action with respect to such complaint without the consent of the agency unless:

(a) The agency has failed to commence proceedings with respect to the complaint before the end of the thirtieth day after the date of such referral;

(b) The agency, having so commenced proceedings, fails to carry forward the proceedings with reasonable promptness; or

(c) The commission determines that the agency no longer qualifies for certification under this section with respect to the relevant jurisdiction.

(3) (a) The commission may certify a local agency under this section only if the commission determines that the following are substantially equivalent to those created by and under the Nebraska Fair Housing Act:

(i) The substantive rights protected by the agency in the jurisdiction with respect to which certification is to be made;

(ii) The procedures followed by the agency;

(iii) The remedies available to the agency; and

(iv) The availability of judicial review of the agency's action.

(b) Before making such certification, the commission shall take into account the current practices and past performance, if any, of the agency.

Section 20-333. Commission; discriminatory housing practice; determination; charge; contents; service; referral to Attorney General; dismissal of complaint.

(1) (a) The commission shall, within one hundred days after the filing of the complaint or after the commencement of further action under section 20-332, determine based on the facts whether reasonable cause exists to believe that a discriminatory housing practice has occurred or is about to occur unless it is impracticable to do so or unless the commission has approved a conciliation agreement with respect to the complaint. If the commission is unable to make the determination within one hundred days after the filing of the complaint or after the commencement of such further action, the commission shall notify the complainant and respondent in writing of the reasons for not doing so.

(b) (i) If the commission determines that reasonable cause exists to believe that a discriminatory housing practice has occurred or is about to occur, the commission shall, except as provided in subdivision (iii) of this subdivision, immediately issue a charge on behalf of the aggrieved person, for further proceedings under sections 20-335 to 20-340.

(ii) Such charge shall consist of a short and plain statement of the facts upon which the commission has found reasonable cause to believe that a discriminatory housing practice has occurred or is about to occur, shall be based on the final investigative report, and need not be limited to the facts or grounds alleged in the complaint filed under section 20-326.

(iii) If the commission determines that the matter involves the legality of any state or local zoning or other land-use law or ordinance, the commission shall immediately refer the matter to the Attorney General for appropriate action under section 20-343 instead of issuing such charge.

(c) If the commission determines that no reasonable cause exists to believe that a discriminatory housing practice has occurred or is about to occur, the commission shall promptly dismiss the complaint. The commission shall make public disclosure of each such dismissal.

(d) The commission may not issue a charge under this section regarding an alleged discriminatory housing practice after the filing of a civil action commenced by the aggrieved party under state or federal law seeking relief with respect to that discriminatory housing practice.

(2) After the commission issues a charge under this section, the commission shall cause a copy of the charge, together with information as to how to make an election under section 20-335 and the effect of such an election, to be served:

(a) On each respondent named in the charge, together with a notice of opportunity for a hearing at a time and place specified in the notice, unless such an election is made; and

(b) On each aggrieved person on whose behalf the complaint was filed.

Section 20-334. Commission; investigations; hearings; powers and duties; violation; penalty.

(1) The commission may issue subpoenas and order discovery in aid of investigations and hearings under the Nebraska Fair Housing Act. The subpoenas and discovery may be ordered to the same extent and subject to the same limitations as would apply if the subpoenas or discovery were ordered or served in aid of a civil action in the district court.

(2) Witnesses summoned by a subpoena shall be entitled to the same witness and mileage fees as witnesses in proceedings in district court. Fees payable to a witness summoned by subpoena issued at the request of a party shall be paid by that party or, when a party is unable to pay the fees, by the commission.

(3) (a) Any person who willfully fails or neglects to attend and testify or to answer any lawful inquiry or to produce records, documents, or other evidence, if it is in such person's power to do so, in obedience to the subpoena or other lawful order under subsection (1) of this section shall be guilty of a Class I misdemeanor.

(b) Any person shall be guilty of a Class I misdemeanor who, with intent to mislead another person in any proceeding under that act:

(i) Makes or causes to be made any false entry or statement of fact in any report, account, record, or other document produced pursuant to subpoena or other lawful order under subsection (1) of this section;

(ii) Willfully neglects or fails to make or to cause to be made full, true, and correct entries in such reports, accounts, records, or other documents; or

(iii) Willfully mutilates, alters, or by any other means falsifies any documentary evidence.

Section 20-335. Civil action in lieu of hearing; election authorized.

When a charge is issued under section 20-333, a complainant, a respondent, or an aggrieved person on whose behalf the complaint was filed may elect to have the claims asserted in that

charge decided in a civil action under section 20-340 in lieu of a hearing under section 20-336. The election must be made not later than twenty days after service has been made under section 20-333. The person making the election shall give notice of doing so to the commission and to all other complainants and respondents to whom the charge relates.

Section 20-336. Commission; hearings; hearing officer; appearance; discovery; discontinuance of proceedings; when.

(1) If an election is not made under section 20-335 with respect to a charge issued under section 20-333, the commission shall provide an opportunity for a hearing on the record with respect to the charge. The commission shall delegate the conduct of a hearing under this section to a hearing officer. The hearing officer shall meet the qualifications of a judge of the district court prescribed in section 24-301 or any successor statute. The hearing officer shall be appointed by the commission pursuant to rules and regulations promulgated by the commission. The hearing officer shall conduct the hearings at a place in the vicinity of the place where the discriminatory housing practice is alleged to have occurred or to be about to occur.

(2) At the hearing each party may appear in person, be represented by counsel, present evidence, cross-examine witnesses, and obtain the issuance of subpoenas under section 20-334. Any aggrieved person may intervene as a party in the proceeding. The rules of evidence shall apply to the presentation of evidence in such hearing as they would in a civil action in district court.

(3) (a) Discovery in administrative proceedings under this section shall be conducted as expeditiously and inexpensively as possible consistent with the need of all parties to obtain relevant evidence.

(b) A hearing under this section shall be conducted as expeditiously and inexpensively as possible consistent with the needs and rights of the parties to obtain a fair hearing and a complete record.

(4) Any resolution of a charge before issuance of a final order under section 20-337 shall require the consent of the aggrieved person on whose behalf the charge is issued.

(5) A hearing officer may not continue administrative proceedings under this section regarding any alleged discriminatory housing practice after the filing of a civil action by the aggrieved party under state or federal law seeking relief with respect to that discriminatory housing practice.

Section 20-337. Hearing officer; powers and duties; civil penalties; order; effect.

(1) The hearing officer shall commence the hearing no later than one hundred twenty days following the issuance of the charge unless it is impracticable to do so. If the hearing officer is

unable to commence the hearing within one hundred twenty days, he or she shall notify the commission, the aggrieved person on whose behalf the charge was issued, and the respondent in writing of the reasons for not doing so.

(2) The hearing officer shall make findings of fact and conclusions of law within sixty days after the end of the hearing unless it is impracticable to do so. If the hearing officer is unable to make findings of fact and conclusions of law within such period or any succeeding sixty-day period thereafter, he or she shall notify the commission, the aggrieved person on whose behalf the charge was issued, and the respondent in writing of the reasons for not doing so.

(3) (a) If the hearing officer finds that a respondent has engaged or is about to engage in a discriminatory housing practice, he or she shall promptly issue an order for such relief as may be appropriate which may include actual damages suffered by the aggrieved person and injunctive or other equitable relief.

(b) Subject to subdivision (c) of this subsection, the order may, to vindicate the public interest, assess a civil penalty against the respondent:

(i) In an amount not exceeding ten thousand dollars if the respondent has not been adjudged to have committed any prior discriminatory housing practice or if subdivision (ii) or (iii) of this subdivision does not apply;

(ii) In an amount not exceeding twenty-five thousand dollars if the respondent has been adjudged to have committed one other discriminatory housing practice during the five-year period ending on the date of the issuance of the current charge; or

(iii) In an amount not exceeding fifty thousand dollars if the respondent has been adjudged to have committed two or more discriminatory housing practices during the seven-year period ending on the date of the issuance of the current charge.

(c) If the acts constituting the discriminatory housing practice that is the object of the charge are committed by the same individual who has been previously adjudged to have committed acts constituting a discriminatory housing practice, the civil penalties set forth in subdivisions (b)(ii) and (iii) of this subsection may be imposed without regard to the period of time within which any subsequent discriminatory housing practice occurred.

(4) No such order shall affect any contract, sale, encumbrance, or lease consummated before the issuance of such order and involving a bona fide purchaser, encumbrancer, or tenant without actual notice of the charge.

(5) In the case of an order with respect to a discriminatory housing practice that occurred in the course of a business subject to licensing or regulation by a government agency, the commission shall, not later than thirty days after the date of the issuance of the order or, if the order is judicially reviewed, thirty days after the order is in substance affirmed upon such review:

- (a) Send copies of the findings of fact, conclusions of law, and the order to that governmental agency; and
- (b) Recommend to that governmental agency appropriate disciplinary action, including, when appropriate, the suspension or revocation of the license of the respondent.
- (6) In the case of an order against a respondent against whom another order was issued under this section within the preceding five years, the commission shall send a copy of each such order to the Attorney General.
- (7) If the hearing officer finds that the respondent has not engaged or is not about to engage in a discriminatory housing practice, as the case may be, he or she shall enter an order dismissing the charge. The commission shall make public disclosure of each such dismissal.

Section 20-338. Finding, conclusion, or order; review; final order; service.

- (1) The commission may review any finding, conclusion, or order issued under section 20-337. The review shall be completed not later than thirty days after the finding, conclusion, or order is so issued or the finding, conclusion, or order will become final.
- (2) The commission shall cause the findings of fact and conclusions of law made with respect to any final order for relief, together with a copy of such order, to be served on each aggrieved person and each respondent in the proceeding.

Section 20-339. Appeal; enforcement of hearing officer's order; procedure.

- (1) Any party aggrieved by a final order granting or denying in whole or in part the relief sought may appeal the order. The appeal shall be in accordance with the Administrative Procedure Act, except that venue of the proceeding shall be in the county in which the discriminatory housing practice is alleged to have occurred.
- (2) (a) The commission may petition the district court for the county in which the discriminatory housing practice is alleged to have occurred or in which any respondent resides or transacts business for the enforcement of the order of the hearing officer and for appropriate temporary relief or restraining order.
- (b) The commission shall file in court with the petition the record in the proceeding. A copy of such petition shall be transmitted by the clerk of the court to the parties to the proceeding before the hearing officer.
- (3) (a) Upon the filing of a petition under subsection (1) and (2) of this section, the court may:

- (i) Grant to the petitioner or any other party such temporary relief, restraining order, or other order as the court deems just and proper;
 - (ii) Affirm, modify, or set aside the order, in whole or in part, or remand the order for further proceedings; and
 - (iii) Enforce the order to the extent that the order is affirmed or modified.
- (b) Any party to the proceeding before the hearing officer may intervene in the district court.
- (c) An objection not made before the hearing officer shall not be considered by the court unless the failure or neglect to urge such objection is excused because of extraordinary circumstances.
- (4) If no appeal is filed before the expiration of forty-five days after the date the hearing officer's order is entered, the hearing officer's findings of fact and order shall be conclusive in connection with any petition for enforcement:
- (a) Which is filed by the commission under subsection (2) of this section after the end of such forty-fifth day; or
 - (b) Under subsection (5) of this section.
- (5) If before the expiration of sixty days after the date the hearing officer's order is entered no appeal has been filed and the commission has not sought enforcement of the order under subsection (2) of this section, any person entitled to relief under the order may petition for a decree enforcing the order in the district court for the county in which the discriminatory housing practice is alleged to have occurred.
- (6) The district court in which a petition for enforcement is filed under subsection (2) or (5) of this section shall enter a decree enforcing the order. The clerk of the court shall transmit a copy of such decree to the commission, the respondent named in the petition, and any other parties to the proceeding before the hearing officer.

Section 20-340. Civil action in lieu of hearing; relief authorized.

- (1) If an election is made under section 20-335 to have the claims asserted in the charge decided in a civil action, the commission shall authorize, and not later than thirty days after the elections is made the Attorney General shall commence and maintain, a civil action on behalf of the aggrieved person in the appropriate district court seeking relief under this section.
- (2) Any aggrieved person with respect to the issues to be determined in a civil action under this section may intervene as of right.

(3) In a civil action under this section, if the court finds that a discriminatory housing practice has occurred or is about to occur, the court may grant any relief which a court could grant with respect to such discriminatory housing practice in a civil action under section 20-342. Any relief so granted that would accrue to an aggrieved person in such a civil action shall also accrue to that aggrieved person in a civil action under this section. If monetary relief is sought for the benefit of an aggrieved person who does not intervene in the civil action, the court shall not award such relief if that aggrieved person has not complied with discovery orders entered by the court.

Section 20-341. Attorney's fees and costs; when allowed.

In any administrative proceeding brought under section 20-336, any court proceedings arising from such a proceeding, or any civil action under section 20-340, the hearing officer or the court, as the case may be, may allow the prevailing party, other than the state, reasonable attorney's fees and costs. The state shall be liable for such fees and costs to the same extent as private person.

Section 20-342. Statute of limitations; civil action; rights and duties of parties; remedies allowed; attorney's fees and costs.

(1) (a) (i) An aggrieved person may commence a civil action in an appropriate district court not later than two years after the occurrence or the termination of an alleged discriminatory housing practice or the breach of a conciliation agreement entered into under section 20-327, whichever occurs last, to obtain appropriate relief with respect to such discriminatory housing practice or breach.

(ii) The computation of such two-year period shall not include any time during which an administrative proceeding under section 20-336 is pending with respect to a complaint or charge under the Nebraska Fair Housing Act based upon such discriminatory housing practice. This subdivision shall not apply to actions arising from a breach of a conciliation agreement.

(b) An aggrieved person may commence a civil action under this section whether or not a complaint has been filed under section 20-326 and without regard to the status of any such complaint, but if the commission or a local agency has obtained a conciliation agreement with the consent of an aggrieved person, no action may be filed under this section by such aggrieved person with respect to the alleged discriminatory housing practice which forms the basis for the complaint except for the purpose of enforcing the terms of the agreement.

(c) An aggrieved person may not commence a civil action under this section with respect to an alleged discriminatory housing practice which forms the basis of a charge issued by the commission if a hearing officer has commenced a hearing on the record under section 20-336 with respect to such charge.

(2) Upon application by a person alleging a discriminatory housing practice or a person against whom such a practice is alleged, the court may, if in the opinion of the court the person is financially unable to bear the costs of an action:

(a) Appoint an attorney for the person; or

(b) Authorize the commencement or continuation of a civil action under subsection (1) of this section without the payment of fees, costs, or security.

(3) (a) In a civil action under subsection (1) of this section, if the court finds that a discriminatory housing practice has occurred or is about to occur, the court may award to the plaintiff actual damages and, subject to subsection (4) of this section, may grant as relief, as the court deems appropriate, any permanent or temporary injunction, temporary restraining order, or other order, including an order enjoining the defendant from engaging in such practice or ordering such affirmative action as may be appropriate.

(b) In a civil action under subsection (1) of this section, the court may allow the prevailing party, other than the state, reasonable attorney's fees and costs. The state shall be liable for such fees and costs to the same extent as a private person.

(4) Relief granted under this section shall not affect any contract, sale, encumbrance, or lease consummated before the granting of such relief and involving a bona fide purchaser, encumbrancer, or tenant without actual notice of the filing of a complaint with the commission or a civil action under the act.

(5) Upon timely application, the Attorney General may intervene in the civil action if the Attorney General certifies that the case is of general public importance. Upon intervention the Attorney General may obtain such relief as would be available under section 20-343.

Section 20-343. Attorney General; civil action; powers and duties; relief authorized; intervention; when permitted.

(1) Whenever the Attorney General has reasonable cause to believe that any person or group of persons is engaged in a pattern or practice of resistance to the full enjoyment of any of the rights granted by the Nebraska Fair Housing Act or that any group of persons has been denied any of the rights granted by the act and such denial raises an issue of general public importance, the Attorney General may commence a civil action in any appropriate district court.

(2) (a) The Attorney General may commence a civil action in any appropriate district court for appropriate relief with respect to a discriminatory housing practice referred to the Attorney General by the commission under section 20-337. The action may be commenced not later than the expiration of eighteen months after the date of the occurrence or the termination of the alleged discriminatory housing practice.

(b) The Attorney General may commence a civil action in any appropriate district court for appropriate relief with respect to breach of a conciliation agreement referred to the Attorney General by the commission under section 20-329. The action may be commenced not later than the expiration of ninety days after the referral of the alleged breach under such section.

(3) The Attorney General, on behalf of the commission or other party at whose request a subpoena is issued under section 20-334, may enforce the subpoena in appropriate proceedings in the district court for the county in which the person to whom the subpoena was addressed resides, was served, or transacts business.

(4) (a) In a civil action under subsection (1) or (2) of this section, the court:

(i) May award such temporary relief, including a permanent or temporary injunction, a restraining order, or any other order against the person responsible for a violation of the act as is necessary to assure the full enjoyment of the rights granted by the act;

(ii) May award such other relief as the court deems appropriate, including monetary damages to persons aggrieved; and

(iii) May, to vindicate the public interest, assess a civil penalty against the respondent:

(A) In an amount not exceeding fifty thousand dollars for a first violation; and

(B) In an amount not exceeding one hundred thousand dollars for any subsequent violation.

(b) In a civil action under this section, the court may allow the prevailing party, other than the state, reasonable attorney's fees and costs. The state shall be liable for such fees and costs to the same extent as a private person.

(5) Upon timely application, any person may intervene in a civil action commenced by the Attorney General under subsection (1) or (2) of this section which involves an alleged discriminatory housing practice with respect to which such person is an aggrieved person or a conciliation agreement to which such person is a party. The court may grant such appropriate relief to any such intervening party as is authorized to be granted to a plaintiff in a civil action under section 20-342.

Section 20-344. Violations; penalty.

It shall be unlawful to coerce, intimidate, threaten, or interfere with any person in the exercise of enjoyment of or on account of the person having exercised or enjoyed or having aided and encouraged any other person in the exercise of benefits and rights guaranteed by the Nebraska Fair Housing Act. Any person who violates this section shall be guilty of a Class I misdemeanor.

Attachment G

Chapter 1.40 - COUNCIL BLUFFS CIVIL RIGHTS COMMISSION

Sections:

1.40.010 - Purposes.

The purposes of the city in enacting this chapter are:

- (1) To secure for all individuals within the city, freedom from discrimination because of race, color, religion, creed, sex, sexual orientation, gender identity, national origin, age or mental or physical disability in connection with employment, public accommodations, housing and credit; and thereby to protect the personal dignity of these individuals, to ensure their full productive capacities, to preserve the public safety, health and general welfare, and to promote the interest, rights and privileges of individual citizens within the city;
- (2) To provide for the execution within the city of policies embodied in the Iowa Civil Rights Act of 1965 and in the Federal Civil Rights Act, and to promote cooperation between the city and the state and federal agencies enforcing those acts;
- (3) To provide, at the local level, a civil rights commission dedicated to the following: effective enforcement of this chapter; service as a source of information to employers, laborers, businessmen, employees, tenants and other citizens relative to various civil rights legislation and regulations; and active assistance to prevent and eliminate the effects of discriminatory acts and practices.

(Ord. 5970 § 1, 2008).

1.40.020 - Construction.

This chapter shall be construed broadly to effectuate its purposes.

(Ord. 5655 § 1 (part), 2001).

1.40.030 - Definitions.

For the purposes of this chapter, the following words, terms and phrases are defined as follows:

- (1) "Affirmative action" means a plan whereby a set of specific result-oriented procedures are established and to which a "person" commits himself or herself to apply every good faith effort to achieve. The objective of those procedures is to ensure equal opportunity in public and private employment, housing, public accommodation, credit transactions and city contracts.

- (2) "Bona fide occupational qualification (BFOQ)" means a job-related requirement which bears a demonstrable relationship to the successful performance of the job for which it is used.
- (3) "Commission" means the civil rights commission created by this chapter.
- (4) "Commissioner" means a member of the local civil rights commission.
- (5) "Complainant" means any person filing a complaint with the commission.
- (6) "Contract" means any agreement that is awarded, let, procured or entered into with, or on behalf of, the city or any awarding authority thereof.
- (7) "Contracting authority" means any city department, agency, commission, board or any authorized employee, including any purchasing agent of the city, who makes or enters into any contract agreement for the provision of any goods or services of any kind or nature whatsoever for and on behalf of the city.
- (8) "Court" means the district court in and for the judicial district of the state of Iowa in which the alleged unfair or discriminatory practice occurred, or any judge of the court if the court is not in session at the time.
- (9) "Director" means the city attorney or his or her designee.
- (10) "Disability" means a physical or mental impairment which substantially limits one or more of a person's major life activities, a record of having such an impairment or being regarded as having such an impairment. In reference to employment under this chapter, "disability" also means the physical or mental condition of a person which constitutes a substantial handicap, but which is unrelated to a person's ability to engage in a particular occupation. "Disability" does not include current, illegal use of or addiction to a controlled substance.
- (11) "Employee" means any person employed by an employer.
- (12) "Employer" means the city of Council Bluffs or any board, commission or department thereof, and every other person employing employees within the state of Iowa.
- (13) "Employment agency" means any person undertaking to procure employees or opportunities to work for any other person or any person holding himself or herself to be equipped to do so.
- (14) "Familial status" means one or more individuals under the age of eighteen (18) domiciled with one of the following:
 - (A) A parent or another person having legal custody of the individual or individuals.
 - (B) The designee of the parent or other person having custody of the individual or individuals, with the written permission of the parent or other person.
 - (C) A person who is pregnant or is in the process of securing legal custody of the individual or individuals.

"Familial status" also means a person who is pregnant or who is in the process of securing legal custody of an individual who has not attained the age of eighteen (18) years.

- (15) "Gender identity" means a gender-related identity of a person, regardless of the person's assigned sex at birth.
- (16) "Housing for older persons" means any of the following:
- (A) Housing intended and operated for ninety (90) percent occupancy by at least one person fifty-five (55) years of age or older per unit, and providing significant facilities specifically designed to meet the physical or social needs of such person.
 - (B) Housing intended for and occupied solely by persons sixty-two (62) years of age or older.
 - (C) Housing provided under any state or federal program specifically designated and operated to assist elderly persons (as defined in the state or federal program).
- (17) "Individual" means any natural person.
- (18) "Labor organization" means any organization that exists for the purpose, in whole or in part, of collective bargaining, of dealing with employers concerning grievances, terms or conditions of employment, or of other mutual aid or protection in connection with employment.
- (19) "Person" means one or more individuals, partnerships associates, corporations legal representatives, trustees, receivers, employees or agents, and the city and all of this boards and commissions.
- (20) "Public accommodation" means each and every place, establishment, or facility of whatever kind, nature or class which caters or offers services, facilities or goods to the general public for a fee or charge, provided that any place, establishment or facility which caters or offers services, facilities or goods to the general public gratuitously is a public accommodation if the accommodation receives any substantial governmental support or subsidy.
- "Public accommodation" does not mean any bona fide private club or other place, establishment, or facility which by its nature is distinctly private, except when a distinctly private place, establishment or facility caters or offers services, facilities, or goods to the general public for a fee or charge, or gratuitously, it shall be deemed a public accommodation during such period of use.
- "Public accommodation" includes each state and local government unit or tax-supported district of whatever kind, nature or class that offers services, facilities, benefits, grants, or goods to the public, gratuitously or otherwise. This definition shall not be construed by negative implication or otherwise to restrict any part or portion of the pre-existing definition of the term "public accommodation."
- (21) "Referral" means the process by which the Iowa Civil Rights Commission notifies the local commission that a complainant has been filed with the state commission, and that the same is postponing its investigative activities for a period of sixty (60) days while the local commission investigates and attempts to resolve the matter.
- (22) "Respondent" means that person against whom a complaint has been filed with the commission.

- (23) "Retaliation" means any act directed at a complainant or other person with the intent of affecting that person unfavorably because of his or her formal or informal efforts to secure or aid in securing compliance with this chapter.
- (24) "Sexual orientation" means actual or perceived heterosexuality, homosexuality, or bisexuality."
- (25) "Unfair practice" or "discriminatory practice" is synonymous with, and shall be as specified, in this chapter.

(Ord. 5971 § 1, 2008).

1.40.040 - Establishment, membership and organization.

There is established the Council Bluffs civil rights commission. The commission shall consist of nine members. Commissioners shall be appointed by the mayor, subject to approval by the city council, for a term of three years, with terms expiring on August 1st. In the event of vacancies, special appointments to the commission shall be made by the mayor, subject to approval by the city council. The commission shall elect its own chairperson and such other officers as the commission may deem necessary. All members of the commission shall be residents of the city and shall be broadly representative of the geographical areas of the community. Any member of the commission may, for cause, be removed from office by the mayor, subject to approval of the city council. Missing three or more regular meetings in a calendar year shall be deemed cause, and may result in a commissioner's removal from office. Members shall serve without compensation. A quorum shall consist of five members of the commission. All acts of the commission shall require a majority vote, unless otherwise required by Robert's Rules of Order.

(Ord. 5959 § 1, 2007).

1.40.050 - Holding over in office.

If, for any reason, appointments are not made in a timely manner to fill vacancies on the commission created by the expiration of terms, the commissioners whose terms have expired shall hold over until new appointments are made.

(Ord. 5655 § 1 (part), 2001).

1.40.060 - Powers and duties.

The commission shall have the following powers and duties:

- (1) To investigate and study the existence, character, causes and extent of discrimination in public accommodations, employment, apprenticeship programs, on-the-job training programs, vocational schools, extension of credit, real estate, financial transactions and housing in the city, and to attempt the elimination of such discrimination by education and conciliation;

- (2) To advise and consult with the mayor and city council on all matters involving racial, religious, ethnic, or handicapped prejudice or discrimination in the above-listed areas;
- (3) To report to the mayor and city council relative to the actions taken by the commission as requested by the city council or initiated by the commission;
- (4) To invite and enlist the cooperation of racial, religious and ethnic groups, community organizations, labor and business organizations, fraternal and benevolent societies, veterans' organizations, professional and technical organizations, and other groups in the city in order to carry on the work of the commission. The commission may also aid in the formation of local community groups in such neighborhoods as it may deem necessary or desirable to carry out specific programs designed to lessen tensions or to improve understanding in the community;
- (5) To conduct fact-finding conferences to seek settlements between the charging party and respondent prior to a formal investigation, yet subsequent to the timely filing of a charge of discrimination;
- (6) To receive, investigate, and finally determine the merits of complaints alleging unfair or discriminatory practices;
- (7) By written notice, to request the presence of any person having possession of material or real evidence for the purpose of investigating a complaint of discrimination. The written request shall be by certified mail, return receipt requested. When a person fails to provide the requested information, the commission, or its agent, may petition the district court having jurisdiction for the issuance of a subpoena for the person to so appear, and the court shall in a proper case issue such subpoena;
- (8) To hold hearings upon any complaint made against a person, an employer, an employment agency or labor organization, or the employees or members thereof, to administer oaths and take the testimony of any person under oath, and to compel such persons, employer, employment agency or labor organization, or employees or members thereof, to produce for examination any books and papers relating to any matter involved in such complaint. Such hearings may be held by the commission, by any commissioner or by any hearing officer appointed by the commission;
- (9) To take the necessary remedial action, as to the judgment of the commission, to carry out the purposes of this chapter. For purposes of this subsection and pursuant to the provisions of this chapter, "remedial action" includes, but is not limited to, the following:
 - (A) Hiring, reinstatement or upgrading,
 - (B) Admission or restoration of individuals to programs and admission to a public accommodation or an educational institution,
 - (C) Sale, exchange, lease, rental, assignment or sublease of real property to an individual,
 - (D) Payment to the complainant of damages for an injury caused by the discriminatory or unfair practice, which damages shall include, but are not limited to, actual damages, court costs, and reasonable attorney fees, and the issuance of an order requiring the respondent to cease and desist from said practice,

- (E) Reporting as to the manner of compliance,
 - (F) Posting notices in conspicuous places in the respondent's place of business in a form prescribed by the commission and inclusive of notices in advertising material,
 - (G) In addition to the remedies provided in the preceding provisions of this subsection, the commission may issue an order requiring the respondent to cease and desist from the discriminatory or unfair practice and to take such affirmative action as, in the judgment of the commission, will carry out the purposes of this section,
 - (H) The terms of a conciliation agreement reached with the respondent may require him or her to refrain in the future from committing discriminatory or unfair practices of the type stated in the agreement; to take remedial action as in the judgment of the commission, will carry out the purposes of this chapter; and a consent to the entry in an appropriate district court of a consent decree embodying the terms of the conciliation agreement. Violation of such a consent decree may be punished as contempt by the court upon showing by the commission of the violation at any time within six months of its occurrence. In all cases where a conciliation agreement is entered into, the commission shall issue an order stating its terms and furnish a copy of the order to the complainant, respondent, and such other person(s) as the commission deems proper. At any time, in its discretion, the commission may investigate whether the terms of the agreement are being complied with by the respondent;
- (10) To seek a temporary injunction against the respondent when it appears that a complainant may suffer irreparable injury as a result of alleged violations of this chapter;
 - (11) To issue such publications and reports of investigations and research as in the judgment of the commission shall tend to promote goodwill among the various racial, religious, ethnic and other groups within the city, and which shall tend to minimize or eliminate discrimination in public accommodations, employment, apprenticeships and on-the-job training programs, vocational schools, housing, or credit because of race, creed, color, sex, sexual orientation, gender identity, national origin, disability or age;
 - (12) To cooperate, within the limits of any appropriations made for its operation, with other agencies or organizations, both public and private, whose purposes are consistent with those of this chapter, and in the planning and conducting of programs designed to eliminate discrimination;
 - (13) To hold regularly scheduled meetings at the call of the chairperson of the commission or when requested by a majority of the members of the commission. The meetings of the commission shall be held at the city hall building in Council Bluffs, Iowa. The city attorney or his or her designee shall provide the commission with such staff as is deemed necessary to carry out the duties and responsibilities of the commission. The mayor or his or her designee shall designate the city fund from which the necessary expenses of the commission shall be paid;
 - (14) To enter into contracts with the federal and state civil rights agencies which would further the purposes of this chapter and seek from the federal equal employment

opportunity commission and the federal and state civil rights commission the designation as a deferral agency, which shall have legal precedence in all other cases in its jurisdiction, except where otherwise agreed, or where a complainant requested in written form that the deferral agency not be notified;

- (15) To establish and administer a positive affirmative action plan for the city, and administer any fair housing programs as are necessitated by federal and state regulations;
- (16) To assist all city contracting authorities in preparing equal employment opportunity and anti-discrimination provisions for contract specifications and advise them as to the compliance records of prospective contractors;
- (17) To require that all contracts entered into on behalf of the city, and all subcontractors thereon for which the consideration is in excess of fifty thousand dollars (\$50,000.00) shall contain a nondiscrimination clause barring discrimination in employment, and shall require that the public notices contain the provisions set forth therein;
- (18) To require that all city agencies, boards and commissions forward to the agency all equal employment opportunity documents for review and evaluation prior to their submission thereof to any state or federal agency.

(Ord. 5972 § 1, 2008).

1.40.070 - Public meetings, records and confidentiality.

- (a) All meetings of the commission shall be held in compliance with Chapter 21 of the Code of Iowa regarding open meetings, except that the commission shall hold a closed session for consideration of any complaint of discrimination of a report concerning investigation or conciliation of a complaint, as provided in this chapter.
- (b) The disclosure of information, whether a charge has been filed or not, or revealing the contents of any file is prohibited except in the following circumstances:
 - (1) If a final decision has been reached, a party or a party's attorney may, upon showing that a petition appealing the commission action has been filed, have access to the commission's case file on that complaint.
 - (2) If a case has been approved for public hearing, and the letter informing parties of this fact has been mailed, any party or party's attorney may have access to file information through prehearing discovery measures set out in Iowa Code Chapter 17A. (3) If a decision rendered by the commission in a contested case has been appealed, any party or party's attorney may, upon showing that the decision has been appealed, have access to the commission's case file on that complaint.

The fact that copies of documents related to or gathered during an investigation of a complaint are introduced as evidence during the course of a contested case proceeding does not affect the confidential status of all other documents in the file that are not introduced as evidence.

(Ord. 5655 § 1 (part), 2001).

1.40.080 - Unfair employment practices.

- (a) It is an unfair or discriminatory practice for any:
- (1) Person to refuse to hire, accept, register, classify or refer for employment, to discharge from employment, or to otherwise discriminate in employment against any applicant for employment or an employee because of the age, race, creed, color, sex, sexual orientation, gender identity, national origin, religion or disability of such applicant or employee, unless based upon a bona fide occupational qualification;
 - (2) Labor organization or the employees, agents or members thereof to refuse to admit to membership any applicant, to expel any member, or to otherwise discriminate against any applicant for membership or any member in the privileges, rights or benefits of such membership because of age, race, creed, color, sex, sexual orientation, gender identity, national origin, religion or disability of such applicant or member;
 - (3) Employer, employment agency, labor organization, or the employees, agents, or members thereof to directly or indirectly advertise or in any other manner indicate or publicize that individuals of any particular age, race, creed, color, sex, sexual orientation, gender identity, national origin, religion or disability are unwelcome, objectionable, not acceptable or not solicited for employment or membership unless based upon a bona fide occupational qualification. An employer, employment agency or their employees, servants or agents may offer employment or advertise for employment to only the disabled, when other applicants have available to them other employment compatible with their ability which would not be available to the disabled because of their handicap. Any such employment shall not discriminate among the disabled on the basis of race, color, creed, sex, sexual orientation, gender identity, or national origin.
- (b) This section shall not apply to:
- (1) Any employer who regularly employs less than four individuals. For the purpose of this subsection, individuals who are members of the employer's family shall not be counted as employees;
 - (2) The employment of individuals for work within the home of the employer, if the employer or a member of his or her family reside therein during such employment;
 - (3) The employment of individuals to render personal service to the person of the employer or members of his or her family;
 - (4) Any bona fide religious institution or its educational facility, association, corporation or society with respect to any qualifications for employment based upon religion when such qualifications are related to a bona fide religious purpose. A religious qualification for instructional personnel or administrative officer, serving in a supervisory capacity of a bona fide religious educational facility or religious institution, shall be presumed to be a bona fide occupational qualification;
 - (5) This section shall not prohibit discrimination on the basis of age if the person subject to the discrimination is under the age of eighteen (18) years, unless the person is considered by law to be an adult;

- (6) This section shall not apply to age discrimination in a bona fide apprenticeship employment program if the employee is over forty-five (45) years of age;
- (7) After a handicapped individual is employed, the employer shall not be required under this chapter to promote or transfer such handicapped person to another job or occupation. Any collective bargaining agreement between an employer and labor organization shall contain this section as a part of such agreement.

(Ord. 5973 § 1, 2008).

1.40.090 - Unfair practices—Accommodations or services.

- (a) It is an unfair or discriminatory practice for any owner, lessee, sublessee, proprietor, manager or superintendent of any public accommodation or agent or employee thereof:
 - (1) To refuse or deny any individual because of race, creed, color, sex, sexual orientation, gender identity, national origin, religion or disability, the accommodations, advantages, facilities, services or privileges thereof, or otherwise to discriminate against any individual because of race, creed, color, sex, sexual orientation, gender identity, national origin, religion or disability in the furnishing of such accommodations, advantages, facilities, services or privileges;
 - (2) To directly or indirectly advertise or in any other manner indicate or publicize that the patronage of individuals of any particular race, creed, color, sex, sexual orientation, gender identity, national origin, religion or disability is unwelcome, objectionable, not acceptable, or not solicited.
- (b) This section shall not apply to:
 - (1) Any bona fide religious institution with respect to any qualifications the institution may impose based upon religion, when such qualifications are related to a bona fide religious purpose.
 - (2) The rental or leasing to transient individuals of less than six rooms within a single housing accommodation by the occupant or owner of such housing accommodation if the occupant or owner or members of his or her family reside therein.

(Ord. 5974 § 1, 2008).

1.40.100 - Unfair or discriminatory practices—Housing.

It is an unfair or discriminatory practice for any owner, or person acting for an owner, of rights to housing or rental property, with or without compensation, including but not limited to persons licensed as real estate brokers or salespersons, attorneys, auctioneers, agents or representative by power of attorney or appointment, or any person acting under court order, deed or trust, or will:

- (1) To refuse to sell, rent, lease, assign or sublease any real property or housing accommodation or part, portion or interest therein to any individual because of the race, creed, color, sex, sexual orientation, gender identity, national origin, religion or disability of such individual;

- (2) To discriminate against any individual because of his or her race, color, creed, sex, sexual orientation, gender identity, religion, national origin or disability, in the terms, conditions, and privileges of the sale, rental, lease, assignment, or sublease of any real property or housing accommodation or any part, portion or interest therein;
- (3) To directly or indirectly advertise, or in any other manner indicate or publicize, that the purchase, rental, lease, assignment or sublease of any real property or housing accommodations or any part, portion or interest therein by individuals of any particular race, color, creed, sex, sexual orientation, gender identity, religion, national origin or disability is unwelcome, objectionable, not acceptable or not solicited;
- (4) To discriminate against the lessee or purchaser of any real property or housing accommodation, or part, portion or interest in real property or housing accommodation, or against any prospective lessee or purchaser of the property for accommodation, because of the race, color, creed, religion, sex, sexual orientation, gender identity, disability, or familial status, age or national origin of individuals who may, from time to time, be present in or on the lessee's or owner's premises for lawful purposes at the invitation of the lessee or owner as friends, guests, visitors, relatives or in any similar capacity;
- (5) The provisions of subsections (1) through (4) of this section shall not apply to the following:
 - (A) The rental, leasing or occupancy of dwellings owned or operated by a religious organization, association, or society, or any nonprofit institution operated, supervised, or controlled by a religious organization, association or society, where preference in rental, leasing, or occupancy is given to persons of the same religion, unless membership in the religion is restricted on account of race, color, or national origin,
 - (B) The rental or leasing of a housing accommodation in a building which contains housing accommodations for not more than two families living independently of each other, if the owner or member of the owner's family reside in one of the accommodations,
 - (C) The rental or leasing of a housing accommodation in a building which contains housing accommodations for not more than four families living independently of each other, if the owner resident in one of the housing accommodations for which the owner qualifies for the homestead tax credit under Iowa Code Section 425.1,
 - (D) The rental or leasing of less than six rooms within a single housing accommodation by the occupant or owner of such housing accommodation, if the occupant or owner or members of that person's family reside there,
 - (E) Restrictions based on sex on the rental or leasing of housing accommodations by nonprofit corporation,
 - (F) The rental or leasing of a housing accommodation within which residents of both sexes must share a common bathroom facility on the same floor, of the building;
- (6) The provisions of this section relating to "familial status" shall not apply to housing for older persons, as defined in Section 1.40.030(22);

- (7) Nothing in this chapter limits the applicability of any reasonable local, state or federal restriction on the maximum number of occupants permitted to occupy a dwelling.

(Ord. 5975 § 1, 2008).

1.40.110 - Unfair credit practices.

- (a) It is an unfair or discriminatory practice for any:
- (1) Creditor to refuse to enter into a consumer credit transaction or impose finance charges or other terms or conditions more onerous than those regularly extended by that creditor to consumers of similar economic backgrounds, because of age, color, creed, national origin, race, religion, marital status, sex, sexual orientation, gender identity, or physical disability;
 - (2) Person authorized or licensed to do business in this state pursuant to Chapter 524, 533, 534, 536, or 536A of the Code of Iowa, to refuse to loan or extend credit or to impose terms or conditions more onerous than those regularly extended to individuals of similar economic backgrounds, because of age, color, creed, national origin, race, religion, marital status, sex, sexual orientation, gender identity or physical disability;
 - (3) Creditor to refuse to offer credit, life or health accident insurance because of color, creed, national origin, race, religion, marital status, age, physical disability or sex, sexual orientation, gender identity. Refusal by a creditor to offer credit, life or health accident insurance based upon the age or physical disability of the consumer shall not be an unfair or discriminatory practice if such denial is based solely upon bona fide underwriting considerations not prohibited by U.S.C.A Title 20.
- (b) The provisions of this section shall not be construed by negative implication or otherwise to narrow or restrict any other provisions of this chapter.

(Ord. 5976 § 1, 2008).

1.40.120 - Unfair or discriminatory practices—Education.

- (a) It is an unfair or discriminatory practice for any educational institution to discriminate on the basis of sex in any program or activity. Such discrimination shall include, but not be limited to, the following practices:
- (1) On the basis of sex, exclusion of a person or persons from participation in, denial of the benefits of, or subjection to discrimination in any academic, extracurricular, research, occupational training or other program or activity, except athletic programs;
 - (2) On the basis of sex, denial of comparable opportunity in intramural and interscholastic athletic programs;
 - (3) On the basis of sex, discriminate among persons in employment and the conditions thereof;
 - (4) On the basis of sex, the application of any rule concerning the actual or potential parental, family, or marital status of a person, or the exclusion of any person from any

program or activity or employment because of pregnancy or related conditions dependent upon the physician's diagnosis and certification.

- (b) For the purpose of this section, "educational institution" includes any public preschool, elementary, secondary or merged-area school or any education agency and their governing boards. Nothing in this section shall be construed to prohibit any educational institution from maintaining separate toilet facilities, locker rooms or living facilities for the different sexes so long as comparable facilities are provided.

(Ord. 5655 § 1 (part), 2001).

1.40.130 - Aiding or abetting.

It is an unfair or discriminatory practice for any person to intentionally aid, abet, compel or coerce another person to engage in any of the practices declared unfair or discriminatory by this chapter.

(Ord. 5655 § 1 (part), 2001).

1.40.140 - Retaliation.

It is an unfair or discriminatory practice for any person to:

- (1) Discharge, harass, penalize or otherwise retaliate against an individual because of that individual's attempts to secure compliance or aid in securing compliance with this chapter or the remedies provided hereunder;
- (2) Discharge, harass, penalize or otherwise retaliate with respect to employment, housing, public accommodation or financial practices against any individual because of that individual's association with persons of a particular race, religion, creed, national origin or sex, sexual orientation, or gender identity;
- (3) Discriminate against another individual in any of the rights protected against discrimination on the basis of age, race, creed, color, sex, sexual orientation, or gender identity, national origin, religion or disability by this chapter because such individual has lawfully opposed any practices forbidden under this chapter, obeys the provisions of this chapter, or has filed a complaint, testified or assisted in any proceeding under this chapter.

(Ord. 5977 § 1, 2008).

1.40.150 - Complaint procedures.

- (a) An individual claiming to be aggrieved by a discriminatory practice, his or her agent, the director of the commission, the city attorney or a nonprofit organization with a purpose of combating discrimination, may file a written complaint stating that a discriminatory practice has been committed, setting forth the facts upon which the complaint is based, and setting forth facts sufficient to identify the person charged, who shall hereinafter be referred to as the respondent. The allegations of discriminatory practice set forth in the complaint shall be

promptly reviewed by staff, and a copy shall be sent by certified mail to the respondent. The complaint must be made within one hundred eighty (180) days after the alleged discriminatory practice occurs.

- (b) It is recommended that all parties consider entering into no-fault mediation prior to a full investigation of the complaint.
- (c) The director may administratively close a case for failure to cooperate with the commission or its representatives.
- (d) A complainant may request an administrative release/right-to-sue after their complaint has been on file for more than sixty (60) days. Once a right-to-sue has been issued, the complaint will be closed, and the complainant will have ninety (90) days to commence an action in Iowa District Court.
- (e) If it is determined, after investigation, that no probable cause exists for such complaint, the commission shall notify the complainant and respondent of such determination, and the case shall be closed with the commission.
- (f) If it is determined, after investigation, that probable cause does exist for crediting the allegations of the complaint, the commission's staff shall promptly proceed with conciliation.
- (g) Legal department staff shall notify the Iowa Civil Rights Commission whenever a finding of probable cause or no probable cause has been made with respect to any case within their jurisdiction or whenever such case is otherwise closed.
- (h) The complaint may be amended at any time prior to the scheduling of the complaint for a public hearing and, thereafter, only upon the consent of the person or persons conducting the hearing. Such leave shall be freely given when justice so requires.
- (i) Legal department staff shall notify the Iowa Civil Rights Commission of all complaints filed within five working days of the filing of the complaint.

(Ord. 5910 § 1, 2007).

1.40.160 - Conciliation.

- (a) Prior to a finding of probable cause, the person investigating the complaint may enter into the conciliation process with the respondent at the respondent's request where the investigation has been sufficient for the investigator to determine adequate remedies for the alleged discrimination.
- (b) After a finding of probable cause, the respondent shall be promptly notified, in writing, of the finding and shall be informed of his or her right to conciliate. The notification shall further contain a suggested place, date and time for the conciliation meeting.
- (c) Where the conciliation results in an agreement between the respondent and the commission, the agreement shall be in writing and signed by the respondent or his or her representatives and by the director of the commission. The director shall consult with the complainant prior to signing the agreement, and should the complainant object to the agreement, the agreement must be presented to the commission for its approval before the

agreement may be signed. The complainant shall be given an opportunity to state the reasons for dissatisfaction to the commission.

- (d) If, after attempts to conciliate, the person directed to conciliate finds that conciliation efforts have failed, such failure shall be reported, in writing, to the commission. If the commission determines the charge to be well founded, it will promptly schedule the matter for public hearing. If the commission determines the charge not to be well founded, it shall declare the case closed and shall so notify the Iowa Civil Rights Commission of the failure of conciliation efforts and of the action taken.

(Ord. 5655 § 1 (part), 2001).

1.40.170 - Public hearing.

- (a) After the commission has voted to take a complaint to a public hearing, the commission shall serve on the respondent by certified mail a written notice, together with a copy of the complaint as it may have been amended, requiring the respondent to answer, in writing, the allegations of the complaint at a hearing before one or more members of the commission or a hearing officer at a time and place specified in the notice. A copy of the notice shall be furnished to the complainant, the Iowa Civil Rights Commission, and such other public officers and such other persons as the commission deems proper.
- (b) The notice shall include:
 - (1) A statement of the time, place and nature of the hearing;
 - (2) A statement of legal authority and jurisdiction under which the hearing is to be held;
 - (3) A reference to the particular sections of the ordinance and rules involved;
 - (4) A short and plain statement of the matters asserted. If the commission is unable to state the matters in detail at the time the notice is served, the initial notice may be limited to a statement of the issues involved.
- (c) The hearing will be conducted by any member of the commission or a panel of commission members not to exceed three members elected by vote of the commission or by any person selected as a hearing officer by majority vote of those members eligible to take part in the conducting of the hearing, pursuant to subsection (d) of this section.
- (d) No person shall take part in the conducting of the hearing who has any personal interest in its outcome or who has taken part in the investigation of the complaint. No commissioner who would be disqualified under the above criteria shall take part in any vote or discussion by the commission respecting the complaint.
- (e) If a party fails to appear in a contested case proceeding after a proper service of notice, the person(s) conducting the hearing may proceed and make a decision in the absence of the party.
- (f) Opportunity shall be afforded all parties to respond and present evidence and arguments on all issues involved and to be represented by legal counsel at their own expense. The case for the commission may be presented by any member of the commission's staff or by an

attorney from the city attorney's office. The hearing need not be bound by strict rules of evidence, but the admission of evidence should be based upon sound discretion.

- (g) The record in a case shall include:
 - (1) All pleadings, motions and intermediate rulings;
 - (2) All evidence received or considered and all other submissions;
 - (3) A statement of all matters officially noticed;
 - (4) All questions and offers of proof, objections and rulings thereon;
 - (5) All proposed findings and exceptions.
- (h) Oral proceedings shall be open to the public and shall be recorded either by mechanized means or by a certified shorthand reporter. Oral proceedings or any part thereof shall be transcribed at the request of any party, with the expense of transcription charged to the requesting party. The recording or stenographic notes of oral proceedings or the transcription hereof shall be filed and maintained by the commission for at least five years from the date of the decision. Notice of public hearing shall be disseminated among local news media at least five days prior to the date of the hearing.
- (i) Findings of fact shall be based solely upon the evidence in the record and on matters officially noticed in the record.
- (j) The person(s) conducting the hearing will make written findings of fact and will state, in writing, their determination as to whether or not the respondent discriminated against the complainant, and their recommended disposition, including remedies provided under subsection (9) of Section 1.40.060.
- (k) The commission shall vote as to whether to adopt, modify or overrule the written findings and proposed remedies. Thereupon the commission shall issue a ruling, either incorporating the proposed findings and remedies as its own, stating the commission's decision, including separate findings in remedy. Decisions shall be sent by certified mail to the parties of record for the purposes of Section 1.40.180; the date of filing shall be considered the date of the commission's decision.

(Ord. 5655 § 1 (part), 2001).

1.40.180 - Judicial review.

- (a) Any complainant or respondent claiming to be aggrieved by a final order of the commission, including a refusal to issue an order, may obtain judicial review thereof pursuant to Chapter 17A, Code of Iowa. The commission may obtain an order of court for the enforcement of commission orders in a proceeding as provided in this section.
- (b) An enforcement proceeding brought by the commission shall be brought in the district court in the county in which the alleged discriminatory or unfair practice which is the subject of the commission's order was committed, or in which any respondent required in the order to cease or desist from a discriminatory or unfair practice or to take other affirmative action, resides or transacts business.

- (c) Such an enforcement proceeding shall be initiated by the filing of a petition in such court and the service of a copy thereof upon the respondent. Thereupon, the commission shall file with the court a transcript of the record of the hearing before it. The court shall have the power to grant such temporary relief or restraining order as it deems just and proper, and to make and enter upon the pleadings, testimony and proceedings set forth in such transcript an order enforcing modifying and enforcing as so modified, or setting aside the order of the commission in whole or in part.
- (d) An objection that has not been urged before the commission shall not be considered by the court in an enforcement proceeding, unless the failure or neglect to urge such objection shall be excused because of extraordinary circumstances.
- (e) If no proceeding to obtain judicial review is instituted within thirty (30) days from the service of an order of the commission, the commission may obtain an order of the court for the enforcement of such order of one showing that respondent is subject to the jurisdiction of the commission and resides or transacts business within the county in which the petition for enforcement is brought.
- (f) Any aggrieved party of record may obtain judicial review by filing a petition for judicial review in the District Court of Iowa in and for Pottawattamie County as specified in the Iowa Rules of Civil Procedure.

(Ord. 5655 § 1 (part), 2001).

1.40.190 - Sixty-day administrative release.

- (a) A person claiming to be aggrieved by an unfair or discriminatory practice must initially seek administrative relief by filing a complaint with the commission in accordance with this chapter. A complainant, after the proper filing of a complaint with the commission, may subsequently commence an action for relief in the District Court of Iowa if all of the following conditions have been satisfied:
 - (1) The complainant has timely filed the complaint with the commission as provided in this chapter; and
 - (2) The complaint has been filed with the commission for at least sixty (60) days, and the commission has issued a release to the complainant pursuant to subsection (b) of this section.
- (b) Upon a request by the complainant, and after the expiration of sixty (60) days from the timely filing of a complaint with the commission, the commission shall issue to the complainant a release stating that the complainant has a right to commence an action in the District Court. A release under this subsection shall not be issued if a finding of no probable cause has been made on the complaint or a conciliation agreement has been executed, or the commission has served notice of hearing upon the respondent pursuant to this chapter, or the complaint if closed as an administrative closure and two years have elapsed since the issuance date of the closure.
- (c) An action authorized under this section is barred unless commenced within ninety (90) days after issuance by the commission of a release under subsection (b) of this section. If a

complainant obtains a release from the commission under subsection (b) of this section, the commission shall be barred from further action on that complaint.

(Ord. 5655 § 1 (part), 2001).

1.40.200 - City employment.

In an effort to develop and maintain fair employment practices within city government, pursuant to federal and state equal opportunity laws, the commission shall advise the mayor and city council of personnel practices implemented by the city, including recruitment, selection and general work conditions. In the event it is alleged that the city is in violation of applicable federal or state equal opportunity laws, the allegation shall be received and processed by the state of Iowa Civil Rights Commission. Upon notification that a discrimination complaint has been filed with the Iowa Civil Rights Commission identifying the city as the respondent, the city shall notify the commission within ten (10) calendar days of receipt of the discrimination complaint. Upon receiving notice of a discrimination complaint identifying the city as a respondent, the commission shall investigate the complaint and report its findings, including suggested remedies, to the mayor and city council within thirty (30) calendar days or within the time limits prescribed by the state of Iowa Civil Rights Commission.

(Ord. 5655 § 1 (part), 2001).

1.40.210 - Exceptions.

This chapter shall not apply to the police department or fire department of Council Bluffs, except in respect to employment and housing.

(Ord. 5655 § 1 (part), 2001).

1.40.220 - Limitations.

The prohibitions contained within this chapter pertaining to unfair or discriminatory practices because of age shall be limited to individuals who are at least forty (40) years of age but less than seventy years of age.

(Ord. 5655 § 1 (part), 2001).