A NEW APPROACH TO FAIR HOUSING COMMUNITY ENGAGEMENT

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Supplemental materials

A supplemental document with materials related to the process described in this report is also available. Visit mhponline.org/fair-housing-engagement to download.

Questions or comments

Questions or comments about this report or MHP’s role in support of fair housing community engagement should be directed to Carolyn Szczepanski, Minnesota Housing Partnership Director of Research and Communications, at 651.925.5540 or carolyn.szczepanski@mhponline.org.

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Executive Summary

From mid-2016 to May 2017 Twin Citians demonstrated a novel community engagement process in support of the preparation of an addendum to the region’s 2014 fair housing Analysis of Impediments (AI). This engagement process could serve as a model for other jurisdictions as they plan their community participation required under the new federal fair housing rule.

The addendum and the community engagement process were required in the settlement of a fair housing complaint filed against the cities of Minneapolis and St. Paul. Complainants alleged that the two cities perpetuated segregation in the administration of their affordable housing programs and funding.

By HUD directive, the development of the addendum was to be informed by the guides and resources HUD created for jurisdictions drafting fair housing plans (Assessments of Fair Housing) under the 2015 rule for Affirmatively Furthering Fair Housing. The type of community engagement required under the complaint resolution is seen by HUD as a potential model for Assessments of Fair Housing. HUD contracted with Minnesota Housing Partnership, through the department’s technical assistance program, to support the engagement activities.

The Twin Cities community engagement activities were carried out through two connected initiatives. One was the fair housing advisory committee and the other was a community engagement micro-grant program.

The advisory committee was responsible for assisting the development of the AI addendum. The committee membership represented the major fair housing stakeholders in the Twin Cities. These stakeholders included the jurisdictions responsible for the AI, the local governments and community groups that supported the HUD complaint, and other community-based organizations that opposed the complaint for its potential to cause disinvestment in geographic areas with high percentages of low-income people and people of color.

The community engagement micro-grant program provided resources to organizations closely connected to low-income populations and communities of color to gain those communities’ expertise on issues related to fair housing, including discrimination, housing choice, displacement and segregation. Those community views — obtained through 17 micro-grants — informed the drafting of the AI addendum.

The Twin Cities local governments responsible for preparing the AI addendum found the community engagement process to be groundbreaking in its depth and breadth of participation. The fair housing advisory committee enabled an exchange of viewpoints of stakeholder groups whose views varied on the importance of mobility versus place-based strategies in advancing racial equity and fair housing. Through the micro-grants the government agencies heard from low-income individuals and people of color, perspectives underrepresented in previous AIs because outreach strategies such as public hearings and citizen surveys were ineffective at reaching these communities.

The Twin Cities experience provides a model for governments who hope to facilitate a deeper conversation about discrimination and racial disparities, and bring new community voices to the development of a fair housing plan.
Introduction

In February 2016, Minnesota Housing Partnership (MHP), an experienced HUD technical assistance provider, was requested by HUD to facilitate the creation and work of a fair housing advisory committee. The formation and role of the committee was called for under an agreement to settle a fair housing complaint against the cities of Minneapolis and St. Paul. Under the multi-party agreement, the cities were to revise their fair housing Analysis of Impediments through an addendum assessing the existence of segregation within the Twin Cities, and identifying recommendations for supporting racial integration. The committee’s role was to advise local governments in the selection of a consultant to draft the addendum and to shape the content of the addendum.

To HUD, the addendum was important to achieve a resolution to the complaint, and to improve on past AIs submitted by the HUD grantees in the Twin Cities metropolitan area. It also viewed the work of the committee as an important demonstration of a new approach to community engagement in fair housing planning. This was important as HUD had concerns that populations most directly impacted and intended as the beneficiaries of fair housing were not engaged in the planning process.

The drafting of an addendum to the Twin Cities’ regional AI came at an important juncture in the evolution of fair housing work across the county. In 2015, HUD finalized its rule clarifying what is required of its grantees to meet their obligation of “affirmatively furthering fair housing” (AFFH). By law, the fair housing affirmation is required of jurisdictions that access community development funding from HUD.

With the new fair housing rule HUD prescribed a planning process, the Assessment of Fair Housing (AFH), their grantees must follow before they can affirm that they are furthering fair housing. This process identifies the data that grantee jurisdictions must consider, as well as the type of analysis that must be performed. HUD requires that jurisdictions encourage meaningful community participation in creating the AFH. In their assessments, HUD grantees must report on their types of outreach activities and dates of public hearings or meetings. Local knowledge must also be included in the AFH. This includes information gathered through the community participation process.

To inform this shift to the Assessment of Fair Housing, HUD looks for lessons learned in the Twin Cities preparation of an addendum to the region’s Analysis of Impediments to help other jurisdictions expand community participation as they prepare their fair housing plans.

This report addresses three primary questions raised by HUD as ones being instructive in supporting community engagement:

» What leads to effective participation in fair housing planning by people most impacted by that planning, particularly communities of color?

» How can a HUD-funded technical assistance provider best support low-income people and people of color to participate in fair housing planning?

» What direction or actions by HUD would be most helpful in guiding the work of the technical assistance provider?

1 This process replaces the Analysis of Impediments. The Twin Cities AI addendum was to be a hybrid of the old and new processes. While officially an AI, HUD required that the preparation of the addendum be informed by the tools and guides HUD created for the Assessment of Fair Housing.
In addressing these questions, MHP draws on fair housing advisory committee records and interviews with the range of participants attending the fair housing advisory committee meetings and carrying out related community engagement activities.

The Voluntary Compliance Agreement (VCA)

The Twin Cities fair housing advisory committee was created as the result of the Voluntary Compliance Agreement (VCA), which identified the steps necessary to resolve a complaint concerning the fair housing practices of Minneapolis and St. Paul. ²

The complaints against Minneapolis and St. Paul were two of four brought by community and neighborhood organizations and several suburban jurisdictions,³ alleging that governmental bodies administering federal resources in the Twin Cities were perpetuating racial segregation in violation of the Fair Housing Act.

The complaints against Minneapolis and St. Paul alleged that the cities were failing to affirmatively further fair housing — a requirement for recipients of community development funds — and that their Analysis of Impediments failed to address segregation. Specifically, the AI did not consider the location of affordable housing funded through the low income housing tax credit program. The complaints would be resolved under the terms of VCA agreements executed in 2016 by HUD, the complainants, and each of the two cities.

The VCA agreements included several primary commitments by the two cities intended to address concerns raised in the complaints.

» The development of an addendum to the 2014 Analysis of Impediments, to be completed by mid-May, 2017.

» The creation of a committee to advise in the preparation of the addendum, including representatives of government grantees of HUD and the complainants, with the specific membership of the committee determined by HUD.

» Robust community participation in the preparation of the addendum.

» Inclusion in their annual Action Plans⁴ steps that overcome the impediments identified in the addendum.

The 2014 Analysis of Impediments for the Twin Cities was the joint undertaking of the Fair Housing Implementation Council (FHIC) funding participants comprised of 13 HUD entitlement jurisdictions and three additional agencies. The FHIC, formed in 2002, is a loosely organized body with a membership that has included fair housing advocates, as well as representatives of the HUD grantees.⁵ Every few years grantee members of the FHIC pool their resources to hire a consultant to prepare the AI for the Twin Cities region.

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² The VCA is a vehicle used by HUD to settle a complaint with or without any investigation or determination of wrongdoing by the department.
³ The other two complaints were against the Twin Cities Metropolitan Council and State of Minnesota.
⁴ Action Plans are required by HUD for its community development grantees, and require that the grantees identify how community development funds would be allocated and the rationale behind that proposed allocation.
⁵ The local government grantees that receive HUD CDBG funds are the counties of Anoka, Dakota, Hennepin, Ramsey, and Washington and these cities: Bloomington, Coon Rapids, Eden Prairie, Minneapolis, Minnetonka, Plymouth, St. Paul, and Woodbury. While non-government individuals have participated in the FHIC, their inclusion largely stopped in 2015.
Individual grantee jurisdictions then adopt the analysis so they can annually certify to HUD that they are affirmatively furthering fair housing.

As part of the complaint resolution, HUD required that all 13 grantee jurisdictions pledge to participate in the drafting of the addendum. HUD further required that, in preparing the addendum, the jurisdictions utilize the resources, tools and processes HUD developed to help communities implement the 2015 fair housing rule. Further, the communities were tasked with developing innovative regional strategies that might serve as best practices for other entitlement jurisdictions.6

Creation of the Fair Housing Advisory Committee

Along with the broader role of ensuring that the addendum was developed in a manner consistent with the VCA, the fair housing advisory committee had three major responsibilities:

1. Provide input into the scope of the analysis performed by the fair housing consultant employed by the FHIC, including common definitions and data to be used in the analysis and a work plan for the consultant.

2. Provide input into the selection of the fair housing consultant.

3. Recommend specific strategies to overcome impediments to fair housing choice and foster inclusive communities.

The VCA stipulated that the advisory committee be comprised of individuals representing a variety of fair housing stakeholders, and reflect a balance of interests, including those of the FHIC and complainants. Appointments to the committee were made by the Region V Director for the HUD Office of Fair Housing and Equal Opportunity, based in Chicago.

Mediated by HUD, discussions about committee membership led to an agreement among the VCA signatories that three major interest groups be represented on the committee: the complainants, the FHIC, and a third group, Equity in Place (EIP).

Equity in Place is a coalition of place-based organizations and advocates in the Twin Cities region, largely led by people of color. Equity in Place members countered what they viewed as the integration-only approach of complainants — and were wary of the possible outcome of the complaint process. The division between the complainants and Equity in Place was characterized by HUD as one between those favoring “place-base” (represented by Equity in Place) versus “mobility” (represented by the complainants) approaches to fair housing.7

Initially, HUD agreed to seating on the committee four representatives of the complainants, five members from the local government (FHIC), and four members of Equity in Place. Each stakeholder group named their own representatives, though HUD did exclude individuals that were viewed as the most polarizing in the place-base versus mobility debate.

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6 The cities not part of the VCA signed a separate agreement documenting their pledge to revise the addendum; this document was titled “Roadmap to Revise Analysis of Impediments.”

7 Place-based strategies are ones that improve the living conditions of low-income people living in impoverished areas, whereas mobility strategies are ones that support low-income people moving to places HUD labels as “high opportunity.” HUD acknowledges the value of both place-based and mobility strategies and encourages jurisdictions to formulate a balanced approach incorporating both strategies. More details on this topic can be found in the AFFH Rule Guidebook, HUD, December 2015, p. 12.
Once the basic structure for advisory committee membership was determined, advocates for the complainants and Equity in Place successfully petitioned HUD to appoint several additional individuals who favored either place-base or mobility approaches. In addition, HUD asked MHP, its technical assistance provider, to recruit an affordable housing developer for the committee. MHP also recruited, and HUD approved, individuals from racial and ethnic groups that were not otherwise represented on the committee.  

In total, the fair housing advisory committee included 23 members. Five were government officials (the FHIC representatives); the remaining members were sometimes referred to as the “community members.” Most members — government and community — had one or more alternates chosen from their respective organizations. While the committee’s rules expressly kept a member and alternate from participating simultaneously, alternates freely stepped in when a member could not attend.  

Realizing that the committee would require multiple meetings and a substantial commitment of time, MHP sought to raise funds to compensate community member organizations for the participation of their staff. This effort was only partially successful in that the Minneapolis Foundation provided grant funds to support community-member participation but only for those organizations located within the city of Minneapolis.  

As a means to understand how to best support the advisory committee, at the outset of the process MHP surveyed committee members on their perspectives related to community engagement.  

In the context of the fair housing planning, MHP asked advisory committee members what they consider most valuable about community engagement. The leading response was that it could help establish indicators of fairness and opportunity and help determine what community indicators would be tracked to hold political leaders accountable. But several also responded that people must feel their voices are being heard through engagement activities, and the activities must lead to meaningful change.  

The survey also sought to identify what committee members would see as their organization’s self-interest in participating in the fair housing planning and hosting engagement sessions. The most frequent response was gaining influence in shaping how government agencies would approach integration or expanding opportunity. This was followed by responses such as helping groups expand their understanding of community development practices, fair housing obligations, and government decision-making processes. Their ability to build important relationships with decision makers was also valued.  

In addition, the survey asked for effective ways to engage a community. The most popular response was to incorporate fair housing conversations

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8 These were individuals from Latino, Native American, Hmong, & Somali communities.  
9 Contrary to how it controlled committee membership, HUD didn’t explicitly approve or object to the individuals named as alternates or their participation.  
10 Receiving participation grants ranging from $3,000 to $5,000 were Urban Homeworks, Renters United for Justice, Native American Community Development Institute, and Khyre Solutions.  
11 MHP used Survey Monkey to gain this input; this was an experiment to see if online tools could be used to help expedite the committee process and jump-start conversations at committee meetings. While the engagement survey was considered successful by MHP, a subsequent survey to get input on prospective consultants generated little response and MHP did not continue use of Survey Monkey.
within existing community meetings or events. In their comments, respondents emphasized a number of points on effectiveness: conveying what would be realistic approaches to the fair housing planning; providing understandable background and context using familiar community concerns; avoiding use of written surveys to get community input and reliance on abstractions (like “fair housing law”); and, finally, respecting that community members must do the outreach. One individual added, “Provide details; don’t just sensationalize the issue.”

**Technical Assistance and the Functioning of the Fair Housing Advisory Committee**

In total, there were 12 advisory committee meetings, roughly one per month. MHP’s support role for the advisory committee encompassed a variety of functions. These included meeting planning, facilitation, and recording. MHP also established a Dropbox account for maintaining committee documents. Later, MHP became the grant administrator for community engagement micro-grants.

Throughout the term of the advisory committee, MHP strove to help the group stay focused on its task. This was challenging for several reasons. The committee included individuals with very different backgrounds, some with deep experience in community processes but less knowledge of HUD programs, others with expertise in HUD programs but little work in community organizing. The committee’s purpose was to provide input on a very complex planning process, which had to be completed within a very constrained time period. And because most members came to the committee table as adversaries in the complaint, trust was lacking at the start and had to be developed.

MHP took a number of steps to overcome these obstacles to support the functioning of the advisory committee. To help foster familiarity among committee members, MHP started the committee process by having each member articulate their hopes for the work of the committee. MHP scheduled background training sessions on topics such as fair housing law and HUD programs. Throughout the process and to facilitate committee discussion, MHP condensed and clarified lengthy documents submitted by the fair housing consultant.

Some of the training and support was initiated by advisory committee members. The most significant of these being the Undoing Racism training. Committee members wanted a more direct conversation on topics of institutional racism and how racism manifests in the work of individuals. A national consulting firm, People’s Institute for Survival and Beyond, provided that training.

MHP brought to the first meeting of the advisory committee a proposal for a relatively restrictive and short set of operating rules. These rules were ultimately accepted by advisory committee members, although only one received a recorded committee vote.

- The committee would not have its own leadership; rather, MHP would lead in the role of creating agendas and facilitating committee meetings.
- Only committee members would be seated at the table and have the right to speak; alternates could take on that role in the absence of the principal member.
- Any decision by MHP could be overridden, and any additional individual – not a member of the committee – could be given right to speak, but only with a two-thirds vote of the committee.
The two-thirds vote for non-member speakers was the most contentious proposed rule, and the only one for which a vote was taken. Speakers for the rule limiting non-member participation stated that, as committee members, they were there to speak for and report back to their respective communities; the meetings didn't need to serve as open forums. Those in opposition to the two-thirds rule argued that it would shut out external voices and, by making the meetings unwelcoming, chill community participation.

12 In support of the broader point of needing a two-thirds vote on all committee decisions, a FHIC member said it would not help the governments to receive committee advice if that advice was the result a vote passing by a narrow margin.

13 Several individuals also wanted to avoid participation in committee discussion of individuals seen as most polarizing in the place-base vs. mobility debate.
Several committee members expressed their frustration when the first two meetings included extended debates about process issues, such as deciding who could speak at committee meetings. Over time, however, committee members became more comfortable in their interactions with one another. Also, the limited time for completing the committee’s work kept the conversation focused on the proposed agenda. While occasional disputes between members occurred, the committee was able to keep on track and complete its work within its allotted time.

Selection of the Addendum Consultant

The first task of the advisory committee was to support the FHIC in the selection of a consultant to prepare the AI addendum. This included both input on the consultant Request for Proposals (RFP), and in the selection of the consultant.

While robust community engagement was required under the VCA and was a priority for the FHIC, FHIC leaders informed the advisory committee that they would not seek a consultant with substantial community engagement experience. It had been the experience of the FHIC that consultants were rarely strong in both data analysis and community engagement. For a consultant to draft the addendum, the FHIC prioritized data competency and looked to local, trusted stakeholders to engage the community on fair housing issues.

Advisory committee members offered a variety of comments in their review of a draft RFP. For instance, members suggested the RFP make clear that the consultant should look broadly at local policies, not just zoning, as was implied by the draft RFP. The consultant, they added, needed to have the ability to build relationships with different cultural groups, even though the community engagement would be handled by others. The final RFP clarified that the consultant would work with the FHIC, MHP, the advisory committee and other stakeholders with respect to community engagement. They would gather input from various community groups. The consultant would be responsible for preparing presentation materials for others to use, compiling information and responses from community engagement activities, and creating a summary from this information to incorporate into the addendum. The final RFP also reflected community member interest in requiring experience in building relationships with racially diverse communities.

Community members of the advisory committee were invited to serve on a subcommittee to screen consultants. As representatives of government agencies subject to regulated contracting practices, FHIC members required that any participating community member pledge confidentiality throughout the review process. This later proved to be an issue as at least one advisory committee member did share with outside parties information about the applicants. While this created tensions and disappointment, it did not undermine the contracting process.

After review of the applicants, the screening subcommittee agreed on its top choice. Unfortunately, the top-rated candidate and the FHIC did not reach agreement on a contract and ultimately the FHIC decided against employing that consulting firm. This necessitated an additional round of discussions within the recruiting subcommittee and a second firm, Atlanta-based Mosaic Community Planning, LLC, was selected to write the AI addendum.
Community Engagement Grants

During one of the initial advisory committee meetings, several community members noted that the advisory committee itself could not be the voice of the people directly impacted by the lack of fair housing. The community members emphasized that they were mostly paid organizers or professionals in the community development field and, without more outreach, the AI addendum would largely remain the work of technical experts.

In response to this concern, the FHIC members on the advisory committee proposed that they commit resources to foster input from communities of color. They would make an amount available to fund engagement grants that would approximate the fee of the professional consultant. Grants would be made to organizations that were directly connected to communities of color and best positioned to get honest input.

Community-based members on the advisory committee supported this outreach approach. However, they debated with FHIC how much should be awarded to each engagement grantee and who would decide which organizations would be funded. They advocated for a grant administrator that had a history of making grants to communities of color. A further complication was that several advisory committee community members expressed that they would seek these grants, thus, there needed to be some distance between the committee and the grant making.

Nexus Community Partners was seen as the likely choice for administering the grants. Nexus is a St. Paul-based nonprofit whose mission is to “build engaged and powerful communities of color.” Due to its other commitments, Nexus was unable to serve as grant administrator but Nexus staff did agree to assist the engagement grant process by

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**KEY ASPECTS OF MICRO-GRANT APPLICATION**

**Applicant Qualifications**

» Applicant must have existing relationships with one or more communities of color.

» Applicant must have experience engaging or organizing with one or more communities of color and documenting their community input for an engagement process for a funder, government entity or other community decision process.

» Applicant must have the ability to explain government processes (guidance provided) and how these processes may impact a community.

**Applicant Evaluation Criteria**

» Priority will be given to the engagement of those communities most impacted by fair housing violations, namely people of color, renters, and those with limited incomes.

» Because of underrepresentation of communities of color in previous AIs, priority will be given to applicants whose leadership (Executive Director, Board of Directors, etc.) belongs to one or more community of color.

» Priority will be given to applicants that have connections to one or more of the following communities:

  » Communities of color
  » Limited English Proficiency individuals
  » Immigrants (any immigration status)
  » Low-income
  » Displaced (from rentals and homeownership)
  » Housing Choice Voucher holders (including those unable to place their voucher)
  » Under-represented faith communities
  » Communities under-represented in government processes
recruiting a racially diverse group with community organizing experience to serve as a grant review committee. This structure was acceptable to the community members on the advisory committee. MHP agreed to serve as grant administrator working with the Nexus committee and was able to cover its cost for grant processing through its HUD technical assistance agreement. Starting with a Nexus template for community grant making, MHP and the FHIC developed an RFP for the engagement grants. The draft was then reviewed and accepted by the advisory committee.

The grant application materials both identified the criteria to select proposals and the responsibilities for grantees. Applicants were limited to requesting $4,500. The simple application form reflected the relatively small funding amount offered and the short period allowed to prepare a proposal.

Advisory committee members debated whether the funded community engagement meetings needed to be open to the public. While the FHIC members and some community members wanted to attend the engagement meetings, others believed that certain populations, for instance, immigrants without documents, would be reluctant to share experiences in a room with government officials, or possibly landlords. All agreed that grantees would be encouraged to host open meetings but would have the right to have a closed meeting, if needed, to gain the trust and maintain the safety of community members.

To guide the work of the engagement grantees, Mosaic prepared the “Community Engagement Toolkit.” This toolkit included a form to record demographic information on community participants, a series of questions to be asked in interviews or community meetings, facilitators’ notes providing the rationale behind these questions, and background information on fair housing and the Twin Cities work to create the AI addendum.

Questions specified in the toolkit included asking people to describe their community, whether there is segregation or discrimination, and how community members think living conditions could be improved. Another question asked people to identify other places they would want to live, if...
cost were not an issue, and the barriers they would expect to face in moving there.

The engagement grantees were required to have their community members respond to the questions contained in the toolkit and voluntarily provide their demographic information. Grantees also were obligated to respond to the draft AI addendum, once available, stating whether the draft reflected the interests of their community.

In response to the RFP, 18 organizations submitted applications. The Nexus-convened grant review committee recommended funding for most of these groups. In making its selections, the review committee followed the FHIC’s grant criteria. They considered the geography and population the applicant would reach, its connections to that population, its experience and philosophy of community engagement, the approach for reaching the community for the fair housing dialogue, and budget. In making their recommendations, grant committee members also drew from their direct knowledge of the capacities and authenticities of groups purporting to represent one or more communities.

After engagement grants were awarded,14 FHIC members recognized that some suburban communities would not be adequately covered through the activities of the selected grantees. They decided on a second round of engagement grants and directed MHP to fund five additional organizations. Due to the short amount of time available for completing community engagement activities, no external committee reviewed round-two applications. In total, FHIC committed $71,000 for community engagement micro-grants to 17 organizations.

The grant making process was viewed by all parties as less than ideal because of the short timeframe for gathering community views. Grants were made in November and the grantee reports were due by mid-January. Mosaic was obligated to process the community input and provide the FHIC a report on that input just two weeks after receiving the raw data from the engagement grantees.15

Reflecting the short time allowed to gather community perspectives, most of the engagement grantees purposefully hosted meetings to inform the fair housing addendum, and were not able to bring fair housing discussions to general community meetings or events. Many of these sessions were at apartment properties where participants lived, while others were held at community centers or restaurants frequented by community members. The grantees had full say over how people convened and whether food, daycare, transportation or stipends were provided.

Mosaic reported that 824 individuals responded to the fair housing questions through the engagement grant process, although demographic information was recorded for only a little more than half of the participants. Mosaic estimates that approximately 30% were African American, 20% were Latino, 20% were white non-Latino, 20% were Asian, and slightly less than 10% were American Indian.16

14 In its award of funding the FHIC did modify the proposed list of grantees coming from the Nexus committee based on FHIC’s finding that there were duplications of effort in some service areas or that some applicants already received funding for community engagement as part of an on-going municipal advisory program.

15 The information collected through the round-two grants was submitted after the initial Mosaic community engagement report. The material gathered from these later grantees was used by Mosaic in completing its first draft of the addendum.

16 Based on the completed demographic forms, only 7% were Asian, but Mosaic then added the number of participants attending the three gatherings of Lao and Cambodians, at which demographic forms were not completed.
Mosaic Reports and Committee and Engagement Grantee Reactions

On the Community Engagement Report

Mosaic summarized the community comments in the “Community Engagement Report.” Mosaic wrote that a variety of opinions were offered regarding where people would want to live. Many spoke of their interest in improving schools, transportation, and access to community services in their current neighborhoods, while others hoped to move to locations where these amenities already existed. Mosaic noted that a number of individuals felt that their moving was precluded, not only by lack of funds, but by localized opposition to affordable housing, or resistance to the presence of their racial or cultural group in the target community. The assertion that there should be more affordable housing in all communities was common across engagement grantee reports. Within that basic need for housing, some called for apartments adequate to accommodate large families and multiple generations. In addition to lack of affordability, numerous participants provided examples of discrimination in renting, particularly because of the presence of children.

Mosaic’s “Community Engagement Report” provided an initial assessment of materials received from the community engagement grantees. In its report, Mosaic organized the information on community impressions into four themes:

» Access to Opportunity
» Segregation and Isolation
» Affordable Housing Challenges
» Housing Discrimination

At the advisory committee meeting subsequent to release of Mosaic's report, members had the opportunity to share their reactions via conference call with the consultant. Representatives of a number of the engagement grantees also attended this committee meeting and shared their reactions to this report.

There was considerable pushback on the four themes identified by Mosaic. Advisory members stated that some terms, like “opportunity” and “isolation,” are not part of the community dialogue. Most attending said that additional themes, especially gentrification, needed to be added.

Advisory committee members also were concerned that the community engagement report did not provide historical context regarding why concentrations of poverty existed, nor did it identify the institutional racism or the economic incentives for cities that led to people living where they did. Members said that there were populations left out of the report (e.g., homeless youth) and others were lumped together (Hmong with Vietnamese and Karen), and this diminished the value of the report. One of the engagement grantees said that the report should be described as a snapshot of a community, as opposed to implying that it was a comprehensive description of the wider universe of opinions within any given community.

Mosaic representatives expressed appreciation for the suggestions and promptly set about incorporating the input they received into their first draft of the AI addendum, due three weeks later.

On the Analysis of Impediments Draft Addendum

Within the nearly 400-page draft addendum, Mosaic included an updated section on community engagement, titled “Community Perspectives.” Other sections included demographic and housing market analyses, community-by-community
reviews of zoning and other public policies, and one called “Geography of Opportunity,” which assessed the location of subsidized housing. The themes from the Community Engagement Report were expanded from four to eight and were included in a section called “Equity Analysis,” followed by 45 recommendations that were intended to address the identified fair housing issues.

In light of the substantial amount of material in the draft addendum and limited time for review, MHP encouraged the advisory committee and engagement grantees to focus on the equity analysis, community perspectives, and recommendations sections of the report.

Mosaic representatives attended the advisory committee meeting in March 2017. This enabled advisory committee members and engagement grantees to directly hear from Mosaic and offer their reactions to the draft addendum.

A broad variety of comments were made by those attending the March advisory meeting. Some committee members spoke of the housing challenges facing particular populations (e.g., youth, large families, undocumented immigrants) that they believed were not adequately discussed in the draft. Other comments challenged Mosaic’s framing of various issues (e.g., committee members urged Mosaic to not dwell on community deficiencies but identify community strengths and opportunities for improvement). In response to Mosaic’s recommended strategies, committee members said that more emphasis should be placed on finding resources to ensure recommendations could be implemented.

In addition, several advisory committee members and most engagement grantees submitted written comments. All of the written comments from the advisory committee members and engagement grantees appear in the Appendix to the final draft of the addendum, and they were very consistent with the points made at the March advisory committee meeting. After taking in over a thousand pages of comments, Mosaic submitted its final addendum draft in early May 2017.

At its mid-May advisory committee meeting, members discussed the final AI addendum. To develop their comments, advisory committee members and others in attendance at the meeting caucused by the three major interest groups that comprised the advisory committee: the FHIC, complainants, and Equity in Place.

The Equity in Place group expressed their concern that a deep analysis of racism was still not included in the document and there was no recognition of the urgent need to address gentrification. Further, they articulated that the language carried over from HUD materials, like use of high and low opportunity areas, is not how communities should be described. Finally, they emphasized that the recommendations lack real accountability.

The FHIC cohort thought that, given the very tight time limits, the draft met their expectations. They appreciated the zoning analysis, and said, overall, the draft provided a useful comparative analysis of the metropolitan area.

The complainants did not offer any additional comments on the draft but echoed the sense that there was too little time given to the development of the addendum and its review.

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17 Mosaic also made presentations on the recommendations at three community forums organized by FHIC members. There were in the cities of Minneapolis, St. Paul and Eagan. Comments made at those forums are included in the Appendix to the Analysis of Impediments Addendum.
18 Commenting on the draft addendum was an obligation of the community engagement grantees and 10 percent of each grant was held back pending comment submission. To facilitate grantee comments, MHP provided the grantees with an outline of a broad range of action strategies and encouraged grantees to focus their comments on identifying recommendations they felt best represented the interest of their communities.
19 The AI addendum and Appendix can be found at www.ramseycounty.us/FHIC.
Participant Reflections, Lessons Learned, and Next Steps

In addition to recording comments on the engagement process at the May advisory committee meeting, MHP completed 26 interviews with advisory committee participants, engagement grantees, Mosaic and HUD staff. The interviews were structured to gain insight into the strengths and weaknesses of the formation and function of the advisory committee, the engagement grant process, and the selection and work of the consultant, Mosaic. MHP also sought to learn what steps interviewees expected to take after the completion of the addendum.

Formation of the Advisory Committee

“This process was not designed to resolve all the tensions [regarding how to approach fair housing] but to get people to talk and engage in the drafting of the AI addendum.”
HUD representative

All the major stakeholder groups found value in the creation and role of the advisory committee.

Complainant representatives said that they had hoped that more individuals with fair housing expertise would serve on the committee. They also expressed disappointment that representatives of other stakeholders — faith communities and education representatives being the ones most frequently mentioned — were not included on the committee.

Equity in Place representatives said that they were initially skeptical of the influence the advisory committee would have and were reluctant to participate. But they eventually pushed for inclusion of their membership as they wanted to be at the table with local decision makers as fair housing issues were discussed.

FHIC members said that, while HUD was very directive about its structure, there was substantial agreement with HUD regarding the creation and membership of the advisory committee. In hindsight, they would have encouraged the inclusion of education representatives and more suburban perspectives on the committee.

Functioning of the Advisory Committee

The interviewees of all stakeholder groups agreed that the committee experienced a challenging launch but improved over time. There was consensus among interviewees that the committee rules and process enabled deep although sometimes contentious exchanges to occur over a period of many months, and this enabled members to have a much better understanding of alternative perspectives on advancing fair housing.

Still, several Equity in Place representatives were concerned that the language used during the committee was, at times, hostile to communities of color and often inaccessible and jargon-laden.

“It felt as though the government officials thought that they were doing the community a favor by allowing them space at the table.”
EIP representative

All parties credited MHP for being able to remain neutral and supportive of the committee. However, several interviews suggested that MHP could have done more at the outset of the committee to allow time for trust to develop among committee members, and should have enabled discussions about process prior to launching into the substantive work of the committee.
There was consensus among interviewees that agenda preparation, frequency and length of meetings, venue location, meeting records, materials and food provided at the meetings contributed to sustaining the interchange of ideas at meetings and the strong attendance that occurred throughout the year. A FHIC representative said that the detail of minutes helped others at her agency keep abreast of the work of the committee.

While pre-meeting training sessions were valued — including background on fair housing history and scope, as well as the role of government agencies — some thought that the content of the trainings, such as the federal requirements for an Analysis of Impediments, should have been reintroduced at the time the committee members began review of the materials produced by Mosaic. Also, the voluntary training on “Undoing Racism” was well received by all interviewees that participated, but most thought that it should have been held early in the process of the advisory committee — and one interviewee said that it should have been made mandatory for all committee members.

There were varying perspectives on the purpose of the advisory committee meetings, particularly whether the meetings themselves should have served as a public forum. Members differed in whether committee meetings should have been open to the public or restricted to committee membership. For instance, an Equity in Place interviewee faulted MHP for having all meetings during daytime hours, which limited public participation. Most others agreed that limits placed on participation (including the rule that required a two-thirds vote to allow non-committee members to speak) as being necessary for the committee to accomplish its work.

Community Engagement Grants

While the engagement grants were not called for in the VCA, they were seen by all interviewed as an important addition to the community process — despite the shared viewpoint among grantees and advisory committee members that the quality of the input suffered because the engagement process was rushed.

Engagement grantee reports were frequently characterized as providing valuable snapshots of community voices, but not a comprehensive portrayal of a given community. However, most of the interviewed grantees added that they believed the voice and perspective of at least some significant part of their community was accurately captured in the AI addendum.

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**UNDOING RACISM WORKSHOP**

The Undoing Racism training was a two-day workshop provided by three facilitators from the People’s Institute for Survival and Beyond for approximately 40 community organizers, advocates and government officials affiliated with the Fair Housing Advisory Committee. The impetus for the training came from organizers of color on the committee who felt the language and lens used in the discussions and process of the FHAC was lacking a requisite understanding of systemic and structural racism — and that the work of the FHAC and the entities involved was limited in its immediate and ongoing impact to address fair housing issues if that knowledge gap was left unresolved. The workshop was multi-racial with approximately two-third white and one-third people of color participants.

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20 Identifying one negative associated with the advisory committee operations, interviewees said that MHP’s use of Dropbox to retain committee records did not work as intended; in part, this was due to the complexity behind keeping some committee records private while making others available to the public.

21 Regarding the Undoing Racism training, one community participant voiced disappointment that it appeared that several white leaders from FHAC-participant organizations had lower level staff of color participate in their place.
Several interviewees said that grantees should have been better oriented in how to collect data and the requirements for gathering community input. They said that data from community meetings should have been structured and weighted in a way that better distinguishes differences among geographic areas and cultures.

There was a mix of opinions among grantees regarding the toolkit provided by Mosaic. Some found it very helpful; others saw it as requiring significant interpretation and translation to make it relevant to targeted communities, especially those with strong oral cultures.22

“Some questions didn’t make sense, such as the one asking whether someone would move out of their neighborhood if money were no object. The [Somali elders] view public housing as a resource, not a deficiency of a poor neighborhood that they would aspire to move from.” Engagement grantee facilitator

Grantees were also of different minds regarding the fairness of the maximum $4,500 payment for their work. Some thought $10,000 should have been paid for the assignments, while others said that the amount was sufficient for hosting and recording a single community meeting. A FHIC representative noted that, should this process be repeated, there would be a better effort to match compensation with work level since there was a wide variety among engagement grantees in the number of meetings and interviews conducted. Members of the FHIC were also unsure whether targeted outreach to recruit engagement grantees would be more effective than an RFP.

Grantees were happy with the flexibility provided in how they could budget their funds and pointed to the value of being able to provide gift cards to those surveyed (these ranged from $5 to $25). They also noted that people attending their sessions were very appreciative that their views were being sought by government agencies.

One of the greatest challenges for the engagement grantees was their limitation in being able to convey to their community members that anything would change because of their input. Some thought that this type of conversation with community members should be included in ongoing education activities in the community, and not be undertaken in an abstracted, one-session setting.

“My struggle, our struggle professionally, morally: how do we respond to what we’ve heard?” Engagement grantee facilitator

Interviewees were frustrated that the process of hiring a consultant was derailed when the initially selected consultant didn’t pan out. Opinions varied about Mosaic’s qualifications to do the work, as well as the process for selecting Mosaic as the replacement.

There was general appreciation for the FHIC’s inclusion of community members in the selection of the consultant. However, an EIP interviewee said that there was a breach of trust when a community member of the committee disclosed candidates to an outside party in violation of the confidentiality agreement. A FHIC member said that, should this process be repeated, the consequence of any breach should be spelled out in an agreement (e.g., exclusion from the advisory committee).

22 Mosaic’s representative acknowledged the challenge of creating the toolkit, and, with more time, would have enhanced the phrasing of questions and provided clearer instructions for the grantee facilitators.
Interviewees agreed that Mosaic was charged with a large task on a short timeline, and there was general agreement that Mosaic communicated well with the advisory committee and responded adequately to criticisms and suggestions. FHIC members appreciated Mosaic’s ability to meet deadlines. There were numerous comments made on the strengths and weaknesses of the work product of Mosaic. Most did say that the recommendations by Mosaic were bolstered and enhanced as a result of the interaction between the advisory committee and the consultant.

For its part, Mosaic’s representative said that the process would have been improved had the consultant’s relationship with the advisory committee been identified at the time it was preparing its bid. Mosaic did appreciate the comments it received and, had more time been available, would have wanted more “feedback loops.” A primary challenge to the process, the representative added, was that while Mosaic worked to be neutral among all the parties submitting input, the FHIC was its client. “As long as one party is paying the bill, there will be bias,” the representative acknowledged.

On the Overall Value of the Process and Next Steps

Most of the interviewees found value in their participation in the advisory committee, citing a good exchange of opinions that resulted in understanding the perspectives of others. Additionally, they said the quality of the AI addendum significantly improved as a result of the community process. But one interviewee made clear that the value of community input would only be seen in how the recommendations are handled by the political bodies and if desired change occurs across the region.

“It was a constant struggle to review and remind myself why the [advisory committee] process was important and if it was worth the time or just taking me away from immediate community needs.” EIP representative

At the time of this writing, FHIC members were introducing the recommendations to their agencies and policy makers, with action steps to be determined during the summer and fall of 2017. FHIC members described a new understanding and appreciation for community engagement, which they suggested will be reflected in their agencies’ future approaches to citizen participation. One action already was taken by the City of St. Paul when its council created a Fair Housing Workgroup.

“The AI addendum process transformed the way of getting community input, and seeing community engagement as part of the process, not just a point-in-time feedback opportunity.” FHIC representative

FHIC members also said they expect the FHIC itself will evolve and restructure to include diverse community voices, while still reflecting the unique role and responsibilities of the government representatives.

“While the technical terms are defined in regulation and need to be used in the city’s work, day-to-day vernacular is meaningful and impactful as well. If those who work in government are using terms that are offensive, there needs to be a change in that language.” FHIC representative

23 In general, interviewees thought the data sections were good, though complainants said that some important data sources had been ignored. Several interviewees stated that the analysis and recommendations sections needed more detail. Others commented that the addendum should identify constraints placed on local government, and that the document should provide more historical context to Twin Cities housing patterns.
Advisory committee community members, both Equity in Place and complainants, said they saw their work turning to advocacy to get the recommendations contained in the addendum adopted by participating jurisdictions. They said they will work to ensure the inclusion of the recommendations in HUD grantee Action Plans and Consolidated Plans, as well as municipal comprehensive plans, and advocate for development of affordable housing in suburban areas, as called for in the recommendations.

Several advisory committee community members plan to advocate that community representatives become part of the FHIC, and that the government representatives are racially diverse. In addition, several interviewees suggested that the FHIC periodically report on progress made in implementing the fair housing recommendations.

For its part, HUD sent the FHIC agencies letters stating that, based on their assurances of the completion of obligations identified in the VCA and Roadmap, HUD will accept the fair housing certifications from those jurisdictions. Going forward, HUD will review the Action Plans and other HUD required reporting to determine whether these jurisdictions are taking needed actions to overcome the impediments identified in the addendum.

MHP Response to Research Questions

At the outset of this report, we identified three primary questions of interest to HUD related to the Twin Cities community engagement approach. Our response to these questions is informed by our role in supporting the advisory committee and the interviews undertaken for this report.

What leads to effective participation in fair housing planning by people most impacted by that planning, particularly communities of color?

We believe that the Twin Cities approach to community engagement in the drafting of the AI addendum does provide a model for jurisdictions undertaking fair housing-related planning. This model has two major components: a staff/consultant-supported committee of stakeholders; and funded, community-led outreach and interviews.

The engagement process used in the Twin Cities was expensive and time consuming, but we believe that it resulted in a significant increase in participation by communities of color. We also believe that the approach is scalable; instead of 17 engagement grants as were funded in the Twin Cities, a jurisdiction could elect to make just a few grants, and target those to one or more communities hardest to engage in the typical public input process.

To the extent possible, the engagement process should not be a top-down imposition. The process should build on dialogue, language and perspectives already existing within the communities the jurisdictions hope to reach.

These communities need to know what they are getting in return for their participation. The outcomes from the engagement and government accountability need to be stated as clearly as possible, while recognizing the political context of a given jurisdiction’s fair housing planning.

For the technical assistance provider, the following tasks are critical for the functioning of the stakeholder committee and efficacy of the community engagement.
**Advisory Committee of Stakeholders**

» Clarify the objectives, strategies, and time commitments required for the fair housing advisory committee.

» Identify and recruit members for the advisory committee, maintaining a balance in influence among major stakeholder groups.

» Recommend rules for the functioning of the committee and have the committee agree to its rules (such as for membership, leadership, decision-making, and meeting conduct).

» Provide training and background information to create a baseline of knowledge on items such as the role of the committee, fair housing, issues facing the jurisdiction (and repeating the training as needed to ensure that the information is understood at key times based on the input requested of the committee).

» Provide a mechanism and encouragement for members to step outside of their organizational roles and personally connect with others on the committee, both as people who have common interests and in understanding consequences of racism and the related role and history of institutions.

» Provide neutral and trusted facilitation and support for the committee (including information retention and communications protocols).

**Engagement Grants**

» Identify the communities to participate by culture and geography.

» Provide a process to reach (and translate for, if needed, and record) people in those communities through intermediaries trusted by the community (through RFP process or direct recruitment).

» Identify information to be collected and how it will be used (identify key information to be collected in a manner that enables comparative statements about populations and geographies).

» Provide incentives, funding and other resources, for both the intermediaries and the community members, and offer ways needed fair housing information can be collected within ongoing community conversations.

» Develop a timeline that provides a reasonable period for the process to occur and provides check-in points for the intermediaries during the course of their work.

» Provide the intermediaries program materials, facilitator guides, background information on fair housing and the reasons for collecting and using community comments.

» Train the intermediaries to carry out their roles.

» Have a coordinator manage the process and have a lead contact to answer questions as they arise.

**How can a HUD-funded technical assistance provider best support low-income people and people of color to participate in fair housing planning?**

This response assumes that the assistance provider is responsible for helping to convene and support a group similar to the Twin Cities fair housing advisory committee.

With the Twin Cities, MHP had the advantage of being a known entity, with fair levels of trust with all the major stakeholders, and knowledge of both fair housing issues and local community development practices. In many situations, the technical assistance provider would not have this local knowledge. While the points below draw from the Twin Cities experience, they are intended to be applicable in jurisdictions where the technical assistance provider knows fair housing and community development but not the local actors. Still, the technical assistance provider should seek a local partner that has relationships and trust among the fair housing stakeholders within a jurisdiction.
To support the advisory committee and engagement grants as described above, the technical assistance provider should take the following preliminary steps.

» Learn the role and expectation for recruiting and supporting the advisory committee, the context for the fair housing work, parameters for the functioning of the advisory committee, budget to utilize, and primary clients and contacts.

» Learn who are the key stakeholders on fair housing issues, and why they are stakeholders.

» Strategize how to relate to stakeholder groups in the community (identifying goals for the racial/cultural composition of the technical assistance team). This might also include helping local governments build bridges with specific communities.

» Meet with stakeholder leaders, understand their concerns, history, relationship with other stakeholders and interests in fair housing planning.

What direction or actions by HUD would be most helpful in guiding the work of the technical assistance provider?

With the Twin Cities assignment, MHP’s work was in the context of the resolution of a fair housing complaint. The list below is based on the assumption that a community seeks HUD support to create an Assessment of Fair Housing through the involvement of a technical assistance provider and that a VCA or complaint is not driving the process.

» Provide the technical assistance provider clear guidance on stakeholders to the issue (including the identification of one or more clients for the technical assistance), objectives to be accomplished, constraints faced in reaching the objectives, budget and time limitations.

» Provide a HUD point person as liaison, and back-up point people in case needed.

» Attend advisory committee meetings, and share information on the history of fair housing or rules and procedures the federal government uses in the fair housing law’s implementation.

» Provide as much flexibility as possible with respect to how the technical assistance provider is to help jurisdictions reach their objective; language adjustments might be needed should HUD terms and approaches create barriers to dialogue (e.g., for the Twin Cities the use of the terms “segregation” and “opportunity areas” were considered offensive by a number of community participants).

» Provide local jurisdictions clarity in what outcomes are expected and how they would be monitored (this simply could be a review of the process identified in the AFFH Rule Guidebook).

» Encourage and/or put pressure on jurisdictions to engage with communities normally not part of citizen input processes, suggest that they fund community engagement processes.

» Share experiences and lessons learned in community engagement and technical assistance provider roles among HUD offices and grantees.
List of those interviewed for this report

Asad Aliweyd, President and CEO, New American Academy, Minneapolis MN (community engagement grantee)

Jennifer Arnold, Renters United for Justice, Minneapolis MN (community member, fair housing advisory committee)

Daisy Barton, Program Manager, CROSS Services, Rogers MN (community engagement grantee)

Marian Biehn, Executive Director (retired), Whittier Alliance, Minneapolis MN (community member, fair housing advisory committee)

Andrea Brennan, Housing Director, City of Minneapolis (FHIC member, fair housing advisory committee)

Debbie Goettel, Commissioner District 5, Hennepin County, Richfield MN (community member, fair housing advisory committee)

Jeremy Gray, Principal, Mosaic Community Planning LLC, Atlanta GA

Eric Hauge, Director of Organizing and Public Policy, HOME Line, Minneapolis MN (community engagement grantee)

Elizabeth Johnson, Executive Director, CROSS Services, Rogers MN (community engagement grantee)

Shannon Jones, Executive Director, Hope Communities, Minneapolis MN (community member, fair housing advisory committee)

Mustafa Jumale, Principal, Khyre Solutions, Minneapolis MN (community engagement grantee; community member, fair housing advisory committee)

Katherine Kugel, Housing Finance Program Coordinator, Dakota County CDA, Eagan MN (FHIC member, fair housing advisory committee)

Sara Parcero Leites, Research Associate, Hispanic Advocacy and Community Empowerment (HACER), St. Paul MN (community engagement grantee)

Maurice McGough, Region V Director of the Office of Fair Housing and Equal Opportunity, U.S Department of Housing and Urban Development, Chicago IL

Yusef Mgeni, Vice President & Political Action Chair, MN/Dakota’s Area Conference NAACP, St. Paul MN (community member, fair housing advisory committee)

Maleta Kimmons, Principal, One Family One Community, Minneapolis (community engagement grantee)

Nelima Sitati Munene, African Career, Education and Resource, Inc. (ACER), Brooklyn Center MN (community engagement grantee; community member, fair housing advisory committee)

Kimberly Nevels, Chicago FHEO Center Director, Office of Fair Housing and Equal Opportunity, U.S Department of Housing and Urban Development

Lael Robertson, Attorney, Housing Justice Center, St. Paul MN (community member, fair housing advisory committee)

Michele Smith, Field Office Director, Minneapolis Field Office, U.S Department of Housing and Urban Development

Will Stancil, Research Fellow, Institute on Metropolitan Opportunity, Minneapolis MN

Kaying Thao, Public Policy Advocate, Office for Social Justice, Catholic Charities of St. Paul and Minneapolis (community member, fair housing advisory committee)

Charlie Vander Aarde, Government Relations Specialist, Metro Cities, St. Paul MN

Carl Warren, Visiting Professor of Law, University of St. Thomas, St. Paul MN (community member, fair housing advisory committee)

Sue Watlov-Phillips, Executive Director, Metropolitan Interfaith Council on Affordable Housing, St. Paul MN (community engagement grantee; community member, fair housing advisory committee)

Alyssa Wetzel-Moore, Human Rights Specialist & ADA Coordinator, Human Rights and Equal Economic Opportunity, City of St. Paul MN (FHIC member, fair housing advisory committee)

Tia Williams, Community Organizer, Frogtown Neighborhood Association, St. Paul MN (community member, fair housing advisory committee)
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