ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING

A collaborative community review

2018 - 2023

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Cover Sheet

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1. Submitter name: City of Lincoln, Nebraska
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7. Period covered by this assessment: Program Years 2018 – 2023
8. Initial, amended, or renewal AI: Renewal AI
9. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AI in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;
10. The program participant will take meaningful actions to mitigate impediments identified in its AI conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a) (1), 91.325(a) (1), 91.425(a) (1), 570.487(b) (1), 570.601, 903.7(o), and 903.15(d), as applicable. All Joint and Regional Participants are bound by the certification, except that some of the analysis, Impediments or priorities included in the AI may only apply to an individual program participant as expressly stated in the AI.

(Signature Page)

Executive Summary

Summarize the fair housing issues, significant contributing factors, and impediments. Also, include an overview of the process and analysis

Lincoln is the capital city of Nebraska and the second largest city in the state. In addition to the seat of state government, Lincoln hosts the main campus for the University of Nebraska, several other universities or colleges, and a thriving business community. Lincoln enjoys a strong economy with one of the lowest unemployment rates in the country. The City was founded in 1856 as the village of Lancaster, and was renamed Lincoln in 1867 when it became the capital of Nebraska. The City is governed by a seven member nonpartisan City Council and a Mayor, all elected to four-year terms.

A vibrant and growing community, Lincoln has a population of approximately 280,000 (2016), and a Core Based Statistical Area (CBSA) population (Lancaster and Seward counties) of close to 327,000. As Lincoln has grown, it has also become more diverse, with a growing minority and foreign-born population. As a refugee resettlement community, we are home to numerous nationalities and cultural influences. Nevertheless, Lincoln remains primarily a white community - 83% according to the 2010 census.

The Housing Authority of the City of Lincoln (aka Lincoln Housing Authority or LHA) was created by the City in 1946 with a mission of providing affordable housing to the residents of Lincoln, Nebraska. The Housing Authority fulfills that mission by the ownership and/or management of 1,473 units of rental housing, and by the administration of the federal Housing Choice Voucher Program providing rental assistance to close to 3,000 households. LHA also operates two home ownership programs, provides numerous tenant supportive services, and engages in community partnerships with other providers of housing and social services to further its mission to Lincoln residents.

Although the Lincoln Housing Authority is a governmental entity, it does not have the power to tax, and does not receive local tax dollars. It is governed by a five-member Board of Commissioners appointed by Lincoln's Mayor and approved by the City Council. The Board of Commissioners appoints an Executive Director to oversee the daily operation and ensure that the Board's policies are implemented.

Fair housing has long been an important issue in American urban policy – a problem born in discrimination and fueled by growing civil unrest that reached a boiling point in the Civil Rights Movement. The passing of the Fair Housing Act in 1968 was a critical step towards addressing this complex problem, but it was far from a solution. Since the passing of the Act, community groups, private business, concerned citizens, and government agencies at all levels have worked earnestly at battling housing discrimination.

The Fair Housing Act mandates that the U.S. Department of Housing and Urban Development (HUD) "affirmatively further fair housing" through its programs. Towards this end, HUD requires funding recipients to undertake fair housing planning to take proactive steps that will lead to less discriminatory housing markets and better living conditions for minority groups and vulnerable populations.

The Analysis of Impediments to Fair Housing (AI) report requires communities to analyze a series of fair housing issues, take protected classes into consideration (i.e. race, color, religion, national origin, familial status, sex, and disability), identify contributing factors, and develop Impediments and meaningful actions to create more integrated and balanced living patterns and improve access to opportunity for all. The fair housing issues reviewed in this assessment are:

1. Segregation
2. Racial and Ethnic Concentrations of Poverty
3. Disparities in Access to Opportunity
4. Disproportionate Housing Needs
5. Publicly Supported Housing Location and Occupancy
6. Disability and Access Issues
7. Fair Housing Enforcement, Outreach Capacity and Resources

There is no federal expectation for specific outcomes. Instead, agencies have to carefully and thoughtfully carry out the new process. The City of Lincoln and the Lincoln Housing Authority have collaborated to undertake this Analysis of Impediments to Fair Housing (AI). We sought input from numerous community groups and citizens through focus groups, a community survey, and public comment. We worked to achieve a balanced approach to identifying impediments and actions that builds on Lincoln's unique strengths and challenges.

The following contributing factors have been identified in this AI as areas that contribute to the above fair housing issues (in no particular order) within different areas of analysis:

- Location and type of affordable housing
- Private discrimination
- Community opposition
- Availability, type and frequency of public transportation
- Lack of private investments in specific neighborhoods (grocery, private housing)
- The availability of affordable units in a range of unit sizes
- Lack of public investments in specific neighborhoods, including services or amenities
- Land use zoning laws (mobile home vitality, code enforcement)
- Source of income discrimination (landlord participation in the voucher program)
- Federal funding and policies
- Lack of accessible, affordable housing in a range of unit sizes
- Lack of affordable, integrated housing for individuals who need supportive services
- Sidewalk maintenance
- Access to transportation to persons with disabilities
- Lack of resources for fair housing agencies and organizations

The most common contributing factor was location and type of affordable housing.

Through the actions described in this assessment, we will work to make progress over the next five years on the following seven impediments:

IMPEDIMENT #1: Lack of affordable housing options

IMPEDIMENT #2: Lack of economical ways to preserve adequate housing stock

IMPEDIMENT #3: Lack of knowledge concerning fair housing

IMPEDIMENT #4: Lack of access to information about, affordable homeownership and rental opportunities throughout the city

IMPEDIMENT #5: Lack of access to education and information about policies affecting public transportation

IMPEDIMENT #6: Poor public perception of affordable housing, and neighborhoods with affordable housing

IMPEDIMENT #7: Poor access to identified community and neighborhood assets

Attachments directly mentioned in this assessment will be included as attachments. However, the complete set of maps and data used to inform it will reside via a link on the City of Lincoln website at https://lincoln.ne.gov/city/urban/reports/index.htm. Additionally, this document can be found quickly by navigating to Lincoln.ne.gov keyword: AI

COMPONENT 1: ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

A. Community Participation Process

Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AI process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board.

The Lincoln Housing Authority (LHA) and City of Lincoln Urban Development Department (UDD) developed an outreach plan to engage the Lincoln community in the AI process. HUD-provided tables and charts were supplemented with 100+ additional maps, internal data analysis and local planning documents.

The City of Lincoln amended its citizen participation plan to meet the new community participation requirements outlined in the Affirmatively Furthering Fair Housing (AFFH) rule. Our citizen participation plan was later amended to reflect direction provided by HUD concerning the suspension of the AFFH requirement. After guidance that was received Jan 5th 2018 we reverted to our original Analysis of Impediments to Fair Housing Language and began work to comply with requirements that existed on August 17, 2015.

A team of City of Lincoln and Lincoln Housing Authority staff conducted ten focus groups where they were presented a presentation on the history of fair housing, an overview of previous analysis of impediments to fair housing (AI), and why their engagement was needed. An audiovisual presentation and handouts with ten broad questions were used to guide the conversation. Copies of these documents, recordings of the conversations and summaries of those meetings are available on our website lincoln.ne.gov keyword: AI.

Additionally, we met with the Mayor's Multicultural Advisory Committee to inform them that we would be engaging their communities through cultural centers and other agencies. Nine outreach surveys were sent to cultural centers and to community agencies with hard-to-reach populations. The outreach survey was available in both print and electronic formats. We also met with LHA's landlord and resident advisory boards. Finally, we reached out to local subject matter experts to assist with data analysis, and to engage perspectives held within hard-to-reach populations (i.e. Limited English Proficiency, refugees, homeless, developmental disabled etc.).

Focus groups, outreach surveys, maps and data helped shape the broader, community-wide fair housing survey, In addition, survey design benefited from the best practice experiences of other regional AI surveys. The community survey was promoted and distributed in a number of ways:

- The cities of Lincoln promoted the survey to their respective communities via news releases.
- The Lincoln Housing Authority used their organization contacts to promote its completion.
- The Lincoln Journal Star published an article based on the media release, which promoted survey completion.
- The AI process was discussed on a local radio program and listeners were urged to participate in the survey.
- Requests for survey participation were sent to the City of Lincoln's neighborhood and homeowner associations, the Mayor's Neighborhood Roundtable, and Lincoln Public School principals.
- Request for survey participation were sent to all focus group participants, cultural centers, all city/county employees in Lancaster County, and to Human Service Federation members.

Each contact was asked to complete the community-wide survey, forward it on to others and, if applicable, assist others in completing it (i.e. ESL classes etc.). We also asked contacts who had additional connections, email lists and social media accounts to share and promote the survey. Our community response and support was diverse and balanced. While the complete spectrum of survey recipients is unknown, a few examples of support are presented below.

- NeighborWorks Lincoln sent the request to not only their base, but also to the Lincoln Policy Network, which is a large group of activists who work on neighborhood policy issues.

- The Community Health Endowment -- who received the request for the Human Service Federation -- shared the survey to their network and boosted the survey link on their social media accounts.
- The East Campus Neighborhood Association and Haymarket Neighborhood Association (HNA) also boosted the survey request via their social media accounts with the HNA focusing on 10,000 renters around the City of Lincoln
- Residents in the Census Tract 7 R/ECAP area were engaged in the survey through University of Nebraska-Lincoln housing, and cultural centers and NeighborWorks Lincoln connections among others.

The team also coordinated with the City of Lincoln's City Communications and Lincoln Commission on Human Rights to ensure our message, intent and request were clear. Again, we compiled information into a community website (http://lincoln.ne.gov Keyword: AI) and coordinated with HUD's St. Louis FHEO office to ensure planning standards were met.

A complete list of direct outreach efforts is included in AI Table 36 '*Community Participation Process Table*'

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

Arc of Lincoln
Affordable Housing Initiative
Catholic Social Services
Center for Children Families and the Law
Center for People in Need
City of Lincoln - Analysis
City of Lincoln - Maps (100+)
City of Lincoln - Aging Partners
City of Lincoln - Building & Safety
City of Lincoln - Citizen Information Center
City of Lincoln - Mayor Office
City of Lincoln - Ombudsman, LGBT Liaison, Title VI/ADA Co-Coordinator
City of Lincoln - Parks
City of Lincoln - Planning
City of Lincoln - Public Works
City of Lincoln - Urban Development
Community Development Resources
Community Health Endowment
Department of Health and Human Services
DHHS - Division of Children and Family Services, Refugee Program Coordinator
El Centro de las Américas
Fresh Start
Friendship Home
Good Neighbor Center
Home Builders Association of Lincoln
Housing and Urban Development - Federal
League of Human Dignity
Lincoln Commission on Human Rights
Lincoln Habitat for Humanity
Lincoln Housing Authority – Landlord Advisory Committee
Lincoln Housing Authority – Resident Advisory Committee
Lincoln Public Schools
Lincoln Realtors Association
Lutheran Family Services
Mayor's Multicultural Advisory Committee
National Low Income Housing Coalition – Nebraska Chapter

NeighborWorks-Lincoln
NeighborWorks-Lincoln, Lincoln Policy Network
People's City Mission
Pinnacle Bank Mortgage Lender
Prosper Lincoln - Early Childhood Development
Prosper Lincoln - Employment skills
Prosper Lincoln - Innovation & Entrepreneurship
Real Estate Owners and Managers Association of Lincoln (REOMA)
Region V Systems
Salvation Army
Senator Kate Bolz
South of Downtown Lincoln
The Arc of Lincoln
The Asian Center
The Indian Center
The Malone Center
University of Nebraska Lincoln - Housing
We are Vital / The Commons / Renters Together
Residents of Lancaster and Seward County

How successful were the efforts at eliciting meaningful community participation? If there was low participation, provide the reasons.

The collaboration had a meaningful and balanced community participation process. All planning information was available on our website, which utilizes 'select a language' software that converts information into over 50 languages. Ten focus group were conducted. Outreach surveys were provided to nine cultural and community agencies to share with their respective boards/staff. Lastly, a community-wide fair housing survey was developed and distributed to: all consulted organizations, various groups previously outlined, and the general public. The community-wide survey was promoted through print, web, local radio, and word of mouth. The survey generated 767 responses with roughly 85% of those from Lancaster County. *AI Map 35* shows the distribution of near 60% of survey respondents who gave us their nearest street intersection. All recorded conversations, summaries and reports from various assessment groups are also located on our AI website; Lincoln.ne.gov Keyword: AI.

Initially, there was an unexpected low response rate from the nine cultural center and community agencies. To address this, additional contact was made with each center or agency. The purpose for the Analysis of Impediments to Fair Housing was discussed again, along with the value and benefit of their involvement. Many cultural centers and community agency leaders agreed to support interaction needed to increase the outreach survey's response rate. In spite of these efforts, the study found additional cultural representation was needed to complement the outreach effort. This was adequately achieved through our broader process (as described above) and the community survey.

HUD Table 1 'Demographics' shows the percent of all minorities within the study area --excluding Hispanics -- as 7.25%. Our community survey yielded an 8.2% response rate for the same cohort. Likewise, Hispanics account for 5.61% of the population (per *HUD Table 1*) and 6.2% of our community survey respondents.

While not directly tied to an identified low response rate, this study also recognizes the importance of our disability community and chose to assess the response rate as well. In the community survey, 18.87% of the respondents said "yes" to question #18 'Does any member of your household have a disability of any type-physical, mental, intellectual, or developmental?' This is far greater than the 3% average proportion of the population reported in *HUD Table 13 'Disability by Type'*.

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

Comments and responses from our public hearings are below. Summaries from each focus group and descriptive cross tabs (i.e. county, age, disability, fair housing knowledge, income, race and raw data) for our survey reports can be found in our attachments as well as on our AI website located at Lincoln.ne.gov Keyword: AI.

General Comments:

Comment 1: *How* do you deal with NIMBY-ISM
Response: We agree that it exists, and have identified it as a contributing factor and have identified marketing impediments to begin to address this.

Comment 2: High concentrations of low-income residents in south of downtown area is not sustainable. More citywide effort is needed.
Response: We agree and state this throughout the plan

Comment 3: We need inclusionary zoning
Response: This idea is an action item within Impediment #1

Comment 4: Praise for the work that LHA provides the community. We are lucky to have them.
Response: Noted

Comment 5: The private market needs to do more to construct and maintain affordable housing
Response: This idea is addressed through several action items within Impediment #1 & Impediment #2

Comment 6: Where can residents with ideas come together to solve issues?
Response: This was a discussion during the public hearing. Our actions allow for a variety of opportunities to engage stakeholders.

Comment 7: Lincoln should establish a community land bank.
Response: Currently under Nebraska Revised Statute 19-5203 Lincoln does not qualify for a land bank.

Comment 8: Support for mandating affordable housing when Tax Increment Financing (TIF) is used.
Response: This idea is an action item within Impediment #1

Comment 9: Interest in co-sponsoring events in the five neighborhoods they work in
Response: Noted

Impediment 1 Comments:

Comment 10: Why isn't a percentage defined in Impediment 1, Goal 1 – G 'The City of Lincoln Urban Development Department will create for consideration a proposal in 2018 which would mandate any project with rental unit's created with TIF assistance will include a percentage of units affordable to low income persons.
Response: This is related to the drafting of the proposal, which is an action item in Impediment #1.

Impediment 2 Comments:

Comment 11: The city's Action Center is not enough to ask the city for assistance or feedback for maintenance issues
Response: This is not covered in our assessment, but we will forward it to the city ombudsman.

Comment 12: Current code enforcement is ineffective and requested a resident advisory task force to address enforcement issues.
Response: These issues will be brought forth through action items in Impediment #2

Comment 13: Rental units should be considered for unit rehabilitation?
Response: Previous community development task force directives moved funding toward owner occupied assistance. This practice will be reviewed in our 2018-2023 strategic planning process.

Comment 14: If a community development task force is reinstated its needs to have renter representation
Response: Noted. This practice will be reviewed in our 2018-2023 strategic planning process.

Comment 15: We need more accountability from the landlord community
Response: This issue will be brought forth through action items in Impediment #2

Comment 16: We need more tools to hold landlords accountable

Response: This issue will be brought forth through action items in Impediment #2

Impediment 3 Comments:

Comment 17: Can we have landlord accountability through licensing conditions?
Response: This issue will be brought forth through action items in Impediment #2

Comment 18: Can you explain Impediment 3, Heading 3 – D 'Urban Development will include fair housing information in annual apartment management licensing renewal correspondence starting within six months of Building and Safety's electronic system being deployed'
Response: Building and Safety is moving to an email based system that we can utilize to send fair housing knowledge with each renewal

Impediment 4 Comments:

Comment 19: Can you explain Impediment 4 – Heading 1 – B 'The City of Lincoln will collaborate with league of human dignity to fund reduction of architectural barriers over the next five years'
Response: After discussion, we agreed to replace the word "architectural" with "accessibility" for clarity

Comment 20: Why don't we have a vacancy ordinance?
Response: While we do not propose an ordinance, we do address this issue through an action item in Impediment #2
There was also a broad discussion about how the HCV system works, related wait lists, landlord incentives, and federal funding.

Impediment 5 Comments:

Comment 21: How will you engage low-income persons within your public transportation system?
Response: This issue was addressed in an action item in Impediment #5

Comment 22: Will you host engagement activities where people live and not in office buildings?
Response: This issue was addressed in actions item in Impediment #5

Comment 23: Can you clarify Impediment 5 – Heading 2 – A 'The City of Lincoln will annually work to reach its impediment of increasing 'on-time' status to 85% of the time' Respondent had issues with the bus leaving a few minutes early and having to wait for the next bus. On time should not include being early
Response: This comment will be forwarded to our public transportation system

Impediment 6 Comments:

Comment 24: There was agreement about negative perceptions of certain neighborhoods. Public investments in a neighborhood builds confidence and encourages private investment in the area (e.g. park improvements).
Response: We agree. Actions throughout the impediments will attempt to address this concern.

Impediment 7 Comments:

Comment 25: Bike share stations and bikes should be incorporated in the area South of Downtown
Response: There is an action item in Impediment #7 to increase bike share sites

Comment 26: In relation to Impediment 7 – Heading 1 – B 'The City of Lincoln will assist the redevelopment of one park in a low to moderate income neighborhood annually. A participant proposed Cooper Park for improvements.
Response: Noted. This suggestion will be forwarded to the Parks department.

Comment 27: A discussion about repurposing the F street rec center into a collaborative space that the city, non-profits and residents could better utilize
Response: We will forward this onto the directors of Urban Development and the Parks Department

Comment 28: Can you explain Impediment 7 – Heading 1 – 'The City of Lincoln will support 60 persons to engage in community gardening annually or at a level, that funding permits?
Response: Because the City does not know its funding allocation, we are unable to make a firm commitment outside of the strategic planning process.

LHA Public Hearing Comments:

A representative from NeighborWorks-Lincoln was in attendance to offer comments

Comment 29: LHA the City have done a great job of meeting with different groups and getting input.
Response: Noted

Comment 30: She agreed about the need for affordable housing in all neighborhoods, but expressed concern for continuing to expand the city at the expense of existing areas.
Response: The goals and actions items in the plan attempt to recognize and balance the needs of a growing city and the needs of existing neighborhoods.

Comment 31: Transportation and bus routes are a general concern in the outlying development areas, and do not match the needs to employment opportunities. More public transportation is needed throughout the city
Response: City of Lincoln public transportation system as noted in impediment #5 is working to implement its Transit development plan, which will improve system services.

Comment 32: One part of the Plan generalizes that senior citizens like to downsize into assisted living; the commenter contended that the community also needs to look at continuing opportunities for people to age in place and houses should be built where people can age in place.
Response: The assessment was clarified to recognize this important facet.

No comments or views were rejected. Care and balance was made to incorporate differing points of view into this assessment.

B. Assessment of Past Goals, Actions

Indicate what fair housing impediments, goals & actions were selected by program participant(s) in recent Analyses of Impediments

Seven impediments to fair housing choice were identified in the Analysis of Impediments to Fair Housing Choice (AI) prepared in 2013. The following goals/actions were identified to address the impediments:

1. Yearly community outreach events that concentrate on fair housing law basics.
2. The City of Lincoln conducts a yearly Civil Rights Conference. During the planning meetings for each yearly event, we will discuss potential fair housing sessions and how it may relate to the conference theme.
3. Work with the Lincoln Commission on Human Rights to conduct fair housing testing.
4. Provide fair housing information on the Urban Development Department website by adding links to the AI, Title 11 of the Lincoln Municipal Code, and the Lincoln Commission on Human Rights.
5. Work with the Lincoln Realtors Association to promote fair housing education.

Discuss what progress has been made toward their achievement?

Most of the identified goals/actions center on the Civil Rights Conference because this event reaches over 200 diverse participants annually. For example, the 2015 event focused on both employment and housing issues. Over the years, presenters have included local, regional and national experts in their fields. Conference participants and sponsors have included the Nebraska Department of Economic Development, the Omaha Human Rights and Relations Department, the U.S. Equal Employment Opportunity Commission, the U.S. Department of Housing and Urban Development and the Nebraska Housing Developers Association.

Yearly outreach is part of the Lincoln Commission on Human Rights (LCHR) service to the community. In 2016, staff conducted 180 training sessions reaching approximately 6,600 people. In 2015, LCHR staff conducted 108 sessions reaching approximately 6,000 people.

A link to Title 11 of the Lincoln Municipal Code has been placed on the Urban Development Department website. The Lincoln Commission on Human Rights, which investigates housing related complaints, also has a link to Title 11 on their website.

Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences); and

The annual Civil Rights Conference has been a major success and is an excellent venue for education, promotion, and discussion of fair housing topics. Starting in 2001, the conference has enjoyed 16 years of success providing the public with a forum of wide ranging housing topics. Over the last four years, the conference has averaged 190 participants and a wide range of diverse sponsors such as the Nebraska Department of Economic Development, the Omaha Human Rights and Relations Department, the U.S. Equal Employment Opportunity Commission, the U.S. Department of Housing and Urban Development and the Nebraska Housing Developers Association. Recent conference speakers include representatives from the Department of Housing and Urban Development, the District Office of Equal Opportunity, and the Great Plains Americans with Disabilities Action Center.

Due to budget constraints, we have fallen short in the past on conducting fair housing testing. However, we hope to partner with the Lincoln Commission on Human Rights to begin some testing in 2017. We also need to re-establish our contact with REOMA, the Real Estate Owners and Managers Association of Lincoln, after the retirement of the City of Lincoln Urban Development housing manager.

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

Based on the results of the 2013 AI, work with the Lincoln Commission on Human Rights, and if funding is available, we plan to implement fair housing testing and provide community outreach events were described in the Impediments/Action section of the 2012 AI document.

Discuss how the experience of program participants with past goals has influenced the selection of current goals.

The 2013 AI identified seven goals, many of which centered on the need to educate both the consumer and landlords/property managers. In preparing this Analysis of Impediments to Fair Housing (AI), four years later, some of the same issues were identified while conducting our public input and the need for continued efforts in educating the public and landlords was identified.

In preparing the AI goals, we reviewed fair housing educational and outreach efforts over the last five years and realized Lincoln has been doing some good things, but there is room for improvement. For example, by working with the Lincoln Public Schools, Lincoln Electric System and the Lincoln Water Department we reach and make contact with a very high percentage of Lincoln households among ideas presented in the goals section of this assessment.

C. Demographic Summary

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

The study area for this assessment is the Lincoln metropolitan core-based statistical area (CBSA) which includes Lancaster and Seward counties. In this review, we assess key elements of both the City of Lincoln and the CBSA (i.e. study area) as a whole. The City of Lincoln and Lincoln Housing Authority are required to complete this assessment as a function of their consolidated planning process. This process allows both agencies to receive and invest federal dollars within the City of Lincoln.

The Lincoln-Lancaster Planning Department has written extensively on area demographics in its various comprehensive plans, subarea plans and subsequent plan updates. Their materials can be found at lincoln.ne.gov keyword: compplan. Our review is complementary to their on-going effort, and we recognize many of the same trends identified in their materials affect this study's AI assessment.

Briefly the City of Lincoln's overall demographics in 2010 was: 82.6% white, 3.8% black, 3.9% Asian, 0.6% Native American, 6.3% Hispanic, 47.3% families. The study area's overall demographics in 2010 was: 85% white, 3.2% black, 3.3% Asian, 0.5% Native American, 5.6% Hispanic, 46.8% families.

The City of Lincoln and the study area have grown steadily since 1990 and remain predominantly white in composition. In review, the nonwhite population has grown at a faster rate than the white population. Our minority populations have increased as a percentage of the total population from 1990 to 2010. The greatest increase was within our Hispanic population which grew significantly (310%) across the study period. Other cohort gains were limited and are comparable between the City of Lincoln and the study area. One exception is the white, non-Hispanic cohort. We find that the white population in the study area as a whole increased 19.25% from 1990 to 2010 while the City of Lincoln increased 9% in the same time period.

Our review of *HUD Table 2 'Race & Ethnicity'* shows, within the study area, the total population has increased by 29.5% with the largest decennial increment growth of 14.1% being between 1990 and 2000. *HUD Table 2* also shows increases in all five-race categories from 1990 to 2010: White non-Hispanic 19.25%, black non-Hispanic (125.68%), Hispanic (328.53%), Asian non-Hispanic (202.91%) and Native American non-Hispanic (62.85%).

Next, within this subset of *HUD Table 2*, an average of 92% of all minorities live within the Lincoln jurisdiction; however, this percent has decreased since 1990. This indicates the increasing diversification of the study area. Lincoln's average share has decreased from 1990 to 2010 by 3%. Lastly, in 2010 77% of all white non-Hispanic persons lived in the City of Lincoln. This is down from 85% in 2000 and 84% in 1990. The remaining 23% lives within the study area, which is rural in nature.

Overall, Lincoln's population share accounts for 79% of the study area, which is down 7% from 2000.

The review of national origin within the City of Lincoln and study area shows a foreign-born population increase of 286% and 279% respectively from 1990 to 2010. 96% of this population resides in the Lincoln. *HUD Table 1 'Demographics'* states that Mexico, Vietnam, China and Iraq are the largest contributors to this population sector. These subsets account for 3.4% of the study area's population and 4.3% of Lincoln's population. Other national origins listed were; India, Ukraine, Sudan, Canada, Germany and Korea. Within the study area, they accounted for .6% of the total population and 1.3% of Lincoln's population. 96% of all foreign-born residents reside within Lincoln.

The foreign-born and Limited English Proficiency (LEP) populations have increased noticeably, possibly as a result of Lincoln's active refugee resettlement efforts.

Our review of LEP from *HUD Table 2* mirrors many of the same trends that have already been described. The City of Lincoln and study area have seen an increase of individuals with limited English proficiency, 245% and 262% respectively. 97% of the LEP population in 2010 lived within the City of Lincoln. This is an increase from 92% in 1990. *HUD Table 1* states the Spanish, Vietnamese, Chinese and Arabic language are the most common with LEP populations. Within this sub-grouping, an average of 98% live within the City of Lincoln.

The evaluation of disability type within *HUD Table 1*, which is the same data as *HUD Table 13*, informs us on average 3% of Lincoln and study the area has a form of disability. An average of 87% of those with a disability live within the Lincoln jurisdiction. On average, the percentage of disability by type for both reviewed areas is as follows; hearing difficulty 3.25%, vision difficulty 1.73%, cognitive difficulty 3.56%, ambulatory difficulty 4.9%, self-care difficulty 1.82% and independent living difficulty at 3.38%. The HUD data table does not indicate if these are unique counts. This means one person could identify

themselves as having several disability types. We recognize this dynamic in our analysis. Of these disability types, the greatest deviation from the norm was within the hearing difficulty disability. Unlike other discussed traits, only 83% of this disability type is within the Lincoln jurisdiction. Reasonable explanations include the loud nature of many rural work environments and economic pressures associated with rural areas as a limiting factor of care and health programing.

According to the U.S. Census Bureau's 2011-2015 American Community Survey 5-Year Estimates, Table S1810, an equal number of men and women are disabled. Of the total the white (10.6%), black (9.8%) and American Indian and Alaska Native races (15.9%) had the highest percentage of disability by race. 6.4% of Hispanics and Latinos were disabled. Age cohorts with the highest level of disability were 65-74 and 75 plus year with 24% and 50% respectively. Lastly, the population 65 years and over was the most affected through a disability across all categories.

Spatial clustering of these subgroups will be discussed later in the document.

Our examination of gender furthers our initial discussion on race & ethnicity. We see a budding rural culture within the study area, which has a seen a growth of the male (35.6%) and female (29.1%) population from 1990 to 2010 compared to the City of Lincoln's 26.7% & 20.5% growth, respectively.

Next, we examined the differences and trends of age divisions. As could be expected, longitudinal trends follow a trajectory similar to those discussed in both the race/ethnicity and gender reviews. The City of Lincoln's growth rate is less than the study area across all three cohorts. Specifically, for those under 18, Lincoln grew at 18% compared to 27% for the study area. For 18-64 year olds, the growth rate was 26% compared to 35% and for the 65+ category, it was 23% compared to 31%. In later sections of this assessment, we address location of affordable housing by age.

Lastly, we analyzed changes in family type, specifically the number of families with children. Again, a common trend presents itself; from 1990 to 2010, there is growth within the study area (23%) and less growth within the City of Lincoln (13%).

We initially stated that many of these issues were assessed in the Lincoln/Lancaster Comprehensive Plan. Again, we recognize many of the same trends. For example, the increase of our minority population and the diversification of the study area. Another examples, is the challenges of those who have Limited English Proficiency, primarily associated with migration, which are largely located within the City of Lincoln. The third demographic trend we agree with is the significant growth in the area's senior population. The Lincoln-Lancaster County Planning Department states, "The number of people in Lancaster County aged 65 and older is projected to increase by about 44,000 to reach about 75,000 in 2040. This represents a projected annual growth rate of 2.96 %, the highest among all age sectors." The Planning Department continues, stating, "[They will have different housing preferences] which may open a new market for high quality, smaller homes, condos, accessory dwelling units and apartments." This statement is assessed later as we discuss housing choice.

In conclusion, the City of Lincoln and the study area are growing and diversifying. Minority populations in the City Lincoln have increased an average of 170% from 1990 to 2010 with the greatest change within the Hispanic ethnicity at 310%. The white non-Hispanic population outside of the City of Lincoln increased from 16% in 1990 to 23% in 2010. The growing cultural diversity -- as represented by national origin and LEP data -- has been overwhelmingly within the City of Lincoln. The percent share within the City of Lincoln from 1990 to 2010 has grown from 95% to 96% (study area) and 92% to 97% (City of Lincoln) respectively.

Locations and concentrations of protected classes will be discussed later.

Describe the location of homeowners and renters in the jurisdiction and region, and describe trends over time.

The following two maps show the distribution of housing in Lincoln and the surrounding area. *AI Map 1 'Owner Occupied Housing'* shows the percentage of owner-occupied housing and *AI Map 2 'Renter Occupied Housing'* shows the percentage of renter-occupied housing. *AI Map 21_P1* shows the 'Estimated percent change in the number of homeowners between the periods of 2006-2010 and 2011-2015'. *AI Map 22_P1* shows the 'Estimated percent change in the number of renters between the periods of 2006-2010 and 2011-2015'.

AI Map 1 shows in the lightest shaded areas of the map where less than 43% of housing is owner occupied. *AI Map 21_P1* shows where growth of owner occupied housing has increased or decreased over the last five year. The predominant decline of home ownership is in areas of concentrated persistent poverty. There is also general decline in ownership throughout the Lincoln area spreading towards the suburbs. The central core, Airpark, and College View areas have considerably lower rates of

owner-occupied housing than most of the surrounding areas. Rather than segregation, this overall decline in homeownership reflects the national demographic trend of a stagnant wage growth and tight housing markets.

An additional explanation for the decline of homeownership is proposed by the Planning Department. The premise is that the older sector of the population is choosing to downsize to enter a rental market (i.e. independent living, assisted living) or smaller owner occupied home as they age. This premise was explored in the AI Community Survey 1-Age, Question 38, 'What kind of housing would you like?' This initial dataset is then filtered to only include those who had selected a homeownership option in Question 35, 'How would you describe your housing situation?' This refined data was broken out by age groups as defined in Question 5. For those '61 plus,' only 54% indicated their current home was suitable, while 20% selected 'I would like to downsize.' The percentage wishing to downsize in this age group is significantly higher than the other age groups: 19-30 years (0%), 31-45 years (4.55%), and 40-60 years (7.07%). While this study finds 20% interesting, the limited home satisfaction (54%) of an aging population is even more so. For example, planning director David Cary thought it would be near 70%.

AI Map 2 helps inform the AI INFO-Rental housing report, INFO-Home sale report, and AI INFO_Lnkstat_Liveable Neighborhoods report by comparing tract level information to community wide averages. AI Maps 22_P1 shows how renter-occupied housing occupancy has changed in Lincoln between 2010 and 2015. The rates of rental-occupancy have changed more dramatically in the Fallbrook, Southwest Lincoln and Southeast Lincoln areas. The development of large multi-family housing complexes contributes to this change. In addition, as older homeowners change their housing needs, there can be a shift toward renter-occupancy if investors -- rather than owner-occupants -- acquire those properties. In Lincoln, renter-occupied housing has increased by 2.72% from 2010 to 2015. The future impact of this observation is noted in the City of Lincoln *Comprehensive Plan* and later in this study.

D. General Issues

1. Segregation

a. Analysis

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

HUD Table 3 - Racial/Ethnic Dissimilarity Trends shows the racial and ethnic dissimilarity trends in Lincoln and the region as a whole. According to HUD, the "Dissimilarity Index measures the degree to which two groups are evenly distributed across a geographic area and is commonly used for assessing residential segregation between two groups. Values range from 0 to 100, where higher numbers indicate a higher degree of segregation among the two groups measured. Dissimilarity Index values between 0 and 39 generally indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation.

The City of Lincoln has relatively low levels of segregation by race as indicated by dissimilarity index values below 39 for each race listed in *HUD Table 3*. The region has slightly higher index values, which reflects that whites make up a higher percentage of the population living outside of Lincoln. The index values for Lincoln for all races listed in Table 3 are similar - the highest are Black/White (38.05) and Asian or Pacific Islander/White (37.05).

There is no area of a significant size within the city that is predominantly populated by one nonwhite racial or ethnic group. In general, there is a higher concentration of nonwhite population groups in the central core of Lincoln, north and south of downtown.

Explain how these segregation levels have changed over time (since 1990).

The relatively low levels of segregation within the City of Lincoln area have remained generally consistent since 1990. The nonwhite/white index value has remained fairly constant since 1990 (31.58 in 1990, 32.80 in 2000, and 32.68 in 2010). The black/white index has decreased slightly, from 39.53 in 1990 to 38.05 in 2010. The Asian/white index has increased slightly from 34.22 in 1990 to 37.13 in 2010. The largest change occurred in the Hispanic/white index, which increased from 25.55 in 1990 to 34.30 in 2010. This reflects the significant increase in the Hispanic population from 1990 to 2010, and will be a trend to monitor in the future. The most significant jump in the Hispanic/white index value occurred from 1990 to 2000, with only a slight increase from 2000 to 2010; a decade in which the area's Hispanic population doubled.

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

HUD Maps 1, 2, 3 & 4 (*Race and Ethnicity, Race and Ethnicity Trends, National Origin and Limited English Proficiency* respectively) show the density of different groups within Lincoln and the study area. There is no particular area of significant size within the city that is predominantly populated by one nonwhite racial or ethnic group, although in general there is a higher concentration of nonwhite population groups in the central core of Lincoln, north and south of downtown. In reviewing the national origin and limited English data in *HUD Maps 3 & 4*, it appears persons from Mexico and Spanish-speakers in general, are more likely to settle in the area south of downtown or in parts of northwest Lincoln, such as the Belmont neighborhood. Vietnamese populations are lightly clustered in the central core and in Census Tract 30.01, which is north of Superior Street, along Interstate-180. There are also concentrations of "Indian national origin" populations in Census Tract 30.01. These clusters may reflect new multi-family unit developments. Like the Vietnamese population, there is a concentration of Chinese-speaking people in areas around both University of Nebraska campuses and the Nebraska Wesleyan University campus. This may reflect the significant number of Chinese and Asian foreign students who move to Lincoln to attend higher educational opportunities.

Consider and describe the location of owner and renter occupied housing in determining whether such housing is located in segregated or integrated areas.

As stated earlier, there is no particular area of significant size within the city that is predominantly populated by one nonwhite racial or ethnic group. *AI Map 32_P 'Median Rent'* shows the estimated percent change in the typical (median) gross rent between the periods of 2006-2010 and 2011-2015. The greatest change is in the core and within tracts that have existing or new multifamily dwelling units. This distribution closely mirrors the estimated percent change in the number of renters between the periods of 2006-2010 and 2011-2015 found in *AI Map 22_P1*. This study finds that in general the core has substantially more rental units than the city as whole; however, additional multifamily have been and are being built throughout the city and on the edges to fulfil housing demand. Home ownership is dispersed throughout the community with the lowest rates in the central core and the highest rates along the southwest, south and southeast edge of the city.

Lastly, the study reviewed AI Community Survey 5 question #45 'Please rate the degree of difficulty to access the following factors in your neighborhood? (1=not difficult; 5=very difficult)' to assess whether access to community assets, services and facilities are segregated or integrated within the community. An average of 81% of all respondents or 84% of homeowners and 76% of renters found general low levels of challenge/impediment by respondents who selected levels 1, 2 and 3 on the above Likert scale across all assets, services and facilities.

Further examination of AI Community Survey 5-Housing Type question #45 found those who did not own their home or condo had additional difficulty accessing community assets (i.e. respondents selecting 4,5): grocery stores (13.1% - Owner respondents, 24.7%-Renter respondents), places of worship (6%, 15.9%), banks (10.3%, 13.1%), credit unions (16.9%, 21.2%), healthcare/clinics (15.8%, 30.6%), parks (7%, 15.1%), community gathering places (14.6%, 20.4%), urban agriculture/gardening opportunities (25.8% 29.9%), day care availability (16.6%, 21%), tree canopy (9.3%, 14.1%), quality sidewalks (15.7%, 27.9%), public internet (31.9%, 42.2%), cultural centers (30.6%, 35.2%), pools or recreation centers (17.8%, 22%), public libraries (15.6%, 25.6%), on street parking (8.3%, 20.3%), and trails (14.7%, 22.5%).

The city average for 'greater difficulty' (i.e. respondents selecting 4 and 5) was 18.4%, for homeowners it was 15.4 while the renter average for the same level of difficulty was 23.3%. This assessment recognizes that different types of housing have different levels of asset access. This informs our Analysis of Impediments to Fair Housing, and actions.

Discuss how patterns of segregation have changed over time (since 1990).

In general, there is a higher concentration of nonwhite population groups in the central core of Lincoln, just north and south of downtown. However, the HUD dot matrix maps indicate that the trend from 1990 to 2010 is that the nonwhite population has spread significantly throughout more areas of the city. This holds true across the black, Asian and Hispanic populations. However, as the Hispanic sector of the population has grown, that sector has settled somewhat more predominantly in the areas south and southwest of downtown and in neighborhoods in the northwest quadrant of the city.

Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future.

Looking at data provided by HUD, the demographic trends in Lincoln do not appear to be encouraging greater segregation in the future. Investment in cultural/community anchor points will aid this trend. The white and nonwhite distribution has remained relatively stable since 1990. Furthermore, since 1990, the nonwhite population has grown at a faster rate than the white population. As a percentage of the population, whites have decreased from 93% in 1990 to 83% in 2010. Between 1990 and 2010, the Hispanic population grew from 1.92% to 6.38% of the total population, which represents a growth rate of 310% percent. They are now the largest minority group. The black and Asian population each represent approximately 4% of the population each.

Historically, racial segregation between white and nonwhite races has remained relatively stable. The 2010 rate of 32.6 is only slightly increased from 31.5 in 1990. As expected, the dissimilarity index for Hispanic/white has increased, but it is still a modest 34.3, which is only slightly higher than the white/ nonwhite rate.

New affordable rental housing should be built primarily outside of the central core to encourage mobility and integration. However, access to the downtown market should not be diminished. There are many stakeholders, including the City of Lincoln, who influence where affordable housing is placed within the city. However, neighboring residents can have a "Not In My Backyard" (NIMBY) view of affordable housing.

It is important that housing assistance be available in all census tracts to provide opportunities outside of central core areas of the city. With the decrease of federal funding, the ability to afford rent outside of the core becomes problematic for many households. Similarly, less federal housing funding could lead to fewer housing vouchers and limit construction of new affordable housing.

There is a perception developers could be limiting the number of final plot parcel development for home development in an effort to increase profit margins. On the other hand, one of the comments heard from the homebuilders was that the city needs to develop infrastructure faster to open up more land for housing development. They say this will bring down land costs and subsequent housing costs, and that the long-term benefits of homeownership and subsequent purchases offset the high cost of city infrastructure investment.

Other focus groups stated rental-housing needs to be viewed as an equal housing option. Furthermore, they said the city needs to focus on funding infrastructure improvements for existing housing stock to more fully utilize opportunities that already exist.

This assessment recognizes the need for balance between competing private interests. City funds need to be used equitably to address trends, policies, or practices that lead to higher integration and greater access to opportunity throughout the jurisdiction in the future.

b. Additional Information

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

Each focus group discussed segregation and concentration within the community. None of the focus groups identified a particular type or pattern of systemic segregation. However, many of the groups commented on concentrations or clusters of people with similar characteristics in some locations. All the focus groups agreed that the primary determinant of where people live in Lincoln is their level of income. The greater one's income, the greater array of choices and areas that are accessible. Many areas of Lincoln have a limited supply of affordable housing, particularly in the southern part of the city.

Other comments included:

There is some religious clustering based on personal choice to be near the location of certain religious institutions, schools and catholic parishes;

1. Some types of developments, such as student housing and retirement communities, are generally not available to families with children;
2. A significant amount of the existing housing throughout the community, particularly single-family housing, is not designed with mobility impairments in mind - this limits choices and will likely be a growing concern as the population ages;
3. Newer immigrants from the same country often choose to live close to one another;
4. People with mental illness can end up clustered - via housing density - due to economic limitations;
5. NIMBY - Not In My Backyard - is an obstacle for development of new affordable rental housing and/or other service-enriched housing such as group homes.

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

The availability of affordable housing is the driving force determining where lower-income people live in Lincoln. Beginning with the construction of Wood Bridge Apartments in 1997, the Lincoln Housing Authority has followed a development plan to build new rental housing in areas of the city where there is less likely to be intentionally affordable rental housing available to the lower-income population. This plan has resulted in three new affordable rental properties built in newer neighborhoods in south Lincoln - Wood Bridge, Summer Hill, and Prairie Crossing.

The City of Lincoln uses federal entitlement funding to assist lower-income homeowners and first-time homebuyers using federal entitlement, specifically Community Development Block Grant (CDBG) and Home Investment Partnership Program (HOME). The federal goal for CDBG is "… developing viable urban communities, by providing decent housing and a suitable living environment and expanded economic opportunities… for low- to moderate-income persons." HOME funds are focused on housing for low- and moderate-income households. The majority of CDBG and HOME funds are used for housing rehab and homeownership programs administered by the City of Lincoln Housing Rehabilitation & Real Estate Division. However, some

CDBG funding, administered by City of Lincoln community development staff, is used for projects in low- to moderate-income neighborhoods — such as park improvements and neighborhood commercial area streetscapes. In addition, Urban Development staff directly supports the Mayor's Neighborhood Roundtable, the Neighborhood Hotline, and provides a variety of web resources for neighborhood associations.

The City of Lincoln Community development staff facilitates and supports Lincoln's Homeless Coalition. This coalition is an organization that serves Lincoln's homeless and near homeless families and individuals. The coalition applies annually for funding directly from the U.S. Housing and Urban Development Department.

Tax Increment Financing (TIF) is a local funding tool used by the City to support redevelopment opportunity. This tool supports private development in areas of the community that have an active redevelopment plan in place. The redevelopment process — blight studies, plans, redevelopment agreements, and implementation — requires substantial involvement by city staff. City of Lincoln staff works with redevelopment efforts throughout the community.

Lastly, in early 2015 StarTran launched the Transit Development Plan (TDP), an effort to determine the best approach for improving and expanding transit service in Lincoln. This study included a comprehensive evaluation of the entire transit system. An extensive outreach effort was made to engage the community and determine the needs and preferences of clients. As a result of the TDP, evening service will be expanded on key routes, service frequency will be increased, and direct service routes will be added. More information on the TDP improvements can be found at lincoln.ne.gov Keyword: TDP by or contacting the city directly.

c. 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 segregation.

Community Opposition
Location and type of affordable housing
Private discrimination

Contributing Factors of Segregation - Other

N/A

2. R/ECAPs

a. Analysis

Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction.

According to HUD's established thresholds, racially and ethnically-concentrated areas of poverty (R/ECAPs) are census tracts that have a nonwhite population greater than or equal to 50% and meet either of the following poverty criteria: the poverty rate of a tract is 1) higher than 40% or 2) is more than three times the average poverty rate of tracts in the metropolitan area. The racial/ethnic threshold is lowered to 20% for tracts located outside of metropolitan/micropolitan areas. R/ECAP designation began with the 1990 US Census.

This analysis was completed using data with AFFHT version 0001. We also assessed R/ECAP Census Tract data from HUD’s open data website. It shows Lincoln has not had a designated R/ECAP area at any time within the dataset (1990 to 2010). While the two data sources are different, this assessment uses AFFHT version 0001 as its primary data source.

The study area has two R/ECAP tracts. Both are within the City of Lincoln. The first, Census Tract 7, is a R/ECAP in the Malone/Hawley neighborhood directly to the east of the University of Nebraska-Lincoln (UNL) campus. Census Tract 7 is home to the greatest concentration of UNL students and foreign exchange students of any census tract in Lincoln.

The second, Census Tract 35, includes only the Lincoln Regional Center. The Regional Center is a 250-bed, Joint Commission-accredited, state psychiatric hospital operated by the Nebraska Department of Health and Human Services. The center serves people who need very specialized psychiatric services and provides services to people who, because of mental illness, require a highly structured treatment setting. We feel that Census Tract 35 does not merit further examination in subsequent questions.

Which protected classes disproportionately reside in R/ECAPs compared to the jurisdiction and region?

HUD Table 4 'R/ECAP Demographics' displays the population of the Census Tract 7 R/ECAP based on race and ethnicity. In the city as a whole, 82.68% of the population is white, but in the R/ECAP, only 50.61% of the population is white. The R/ECAP is disproportionately Asian (28.32%), compared to the City of Lincoln (3.91%).

HUD Table 4 'R/ECAP Demographics' and *HUD Table 2 'Demographic Trends'* display the population of R/ECAPs based on families and families with children. The percent of families with children is slightly higher in the R/ECAPs than in the City as a whole; 47.37% of families in Lincoln have children as compared to 53.39% in the Census Tract 7 R/ECAP.

Describe how R/ECAPs have changed over time (since 1990).

AFFHT version 0001 data shows the two R/ECAPs in Lincoln did not exist until 2010. Census Tract 7 marginally meets the criteria set forth to be designated as a R/ECAP area. The demographics of this area appear to reflect its proximity to the University of Nebraska, the University's growth initiatives, and its significant population of foreign exchange students living close to campus. Census Tract 35 is the state psychiatric hospital and is not included in this analysis.

b. Additional Information

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.

Responses at public meetings show there is preconceived community opposition to the expansion of affordable rental housing into new areas (NIMBY); for example, the response of area residents to affordable housing proposed for 84th & South Street.

The location and type of affordable housing available outside of core areas such the Census Tract 7 R/ECAP limits opportunity for integration throughout the city.

Lincoln is growing and there is a potential for the displacement of residents due to economic pressures. The presence of several large major universities (University of Nebraska, Wesleyan University, and Union College) may place upward pressure on housing costs, particularly in the short term before additional housing can be built. However, a complete dataset to assess this notion currently does not exist. Approximately 77% or 20,000 of the students at University of Lincoln-Lincoln live off campus and compete for housing with local residents. University and other higher education students who do not live at home are often directly competing with low-income residents. Housing pressure from students is likely to continue for the foreseeable future as each institution is working to increase their enrollment.

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

The Census Tract 7 R/ECAP has seen many private/public investments that are both physical and social in nature. Examples include:

- Business development and redevelopment along North 27th Street - a working partnership between the City of Lincoln and the North 27th Street Business & Civic Association.
- Publicly funded sidewalk rehabilitation to ensure ADA compliance.
- Development of new affordable housing through public/private investment, primarily as opportunities for first-time homebuyers -- including Liberty Village, Antelope Village, and Antelope Square.
- Focused involvement of several social capacity programs - Community Action Partnerships - Free to Grow Program, the Human Service Federation, and Community Policing Programs in partnership with the Lincoln Police Department and Neighborhood Revitalization support through NeighborWorks-Lincoln.
- Designation as part of the Lincoln Neighborhood Revitalization Strategic Area (NRSA), making projects in the area eligible for additional federal funding resources.
- Removal a large portion of the area from the floodplain through the Antelope Valley Project.
- Development of informal and formal citizen projects/policy with the support of the City of Lincoln (i.e. Neighborhood Plan for Action). Participating residents are engaging their state elected officials in an effort to increase

neighborhood-funding streams, develop additional urban agriculture opportunities and create community orchards in existing parks.

c. Contributing Factors

Contributing Factors of R/ECAPs

- Location and type of affordable housing

Contributing Factors of R/ECAPs - Other

N/A

3. Disparities in Access to Opportunity

a. Analysis

Educational Opportunities

Describe any disparities in access to proficient schools based on race/ethnicity, national origin, and family status.

The *HUD Table 12 'School Proficiency Index*' measures the proficiency of elementary schools as determined by the performance of 4th graders on state exams. A higher score indicates a higher level of school proficiency. According to Table 12, Lincoln's white population has the highest School Proficiency Index overall at 61.56, followed by the Asian population at 51.26. The School Proficiency Index scores for the Black, Hispanic and Native American populations are very similar (46.92, 46.35, 46.51), indicating relatively equal access to proficient schools among those groups. Upon review of the population below the federal poverty line, the indices scores fall across all racial/ethnic groups, and most dramatically in the white, non-Hispanic population group (from 61.56 to 44.9). The Asian/Pacific Islander group has the highest score at 48.25.

HUD Map 7 'Demographics and School Proficiency' displays the School Proficiency Index paired with race/ethnicity, national origin, and households with children. Darker gray areas on the map indicate census tracts with higher school proficiency scores. Lincoln's highest proficiency schools tend to be those in the south central neighborhoods and the edges of the city. The lowest proficiency schools tend to be in the central core, and some scattered areas in the northeast, northwest and southeast parts of the city. The areas north and south of downtown and northeast also correspond to areas with higher rental occupancy rates and a higher concentration of lower-income households.

The nonwhite population is more likely to live in areas with lower school proficiency scores. The white population appears to be spread throughout the city in both lower and higher school proficiency census tracts. The foreign-born population is also more likely to live in areas that have lower proficiency schools, particularly those born in Mexico and China. There does not appear to be any particular connection between households with children and school proficiency scores according to *HUD Map 7.*

Describe the relationship between the residency patterns of racial/ethnic, national origin, and family status groups and their proximity to proficient schools.

According to *HUD Map 7 'Demographics and School Proficiency'*, lower proficiency school areas tend to be located in the older areas north, northwest and south of downtown, and along a northeast corridor following Cornhusker Highway. These areas also have higher concentrations of nonwhite racial/ethnic groups and foreign-born populations, and are surrounded with high rental census tracts. This may indicate a need to increase the supply of affordable rental housing in other areas of the city. The Lincoln Housing Authority Resident Advisory Board also indicated a need to increase affordable housing in south and east Lincoln.

As discussed in the demographics section, the HUD dot matrix maps indicate the trend from 1990 to 2010 is that the nonwhite population has spread significantly throughout more areas of the city. This indicates increased access and proximity to higher proficiency schools. The highest proficiency school areas are in south central Lincoln, the edges of the city, and surrounding rural areas in all directions.

Describe how school-related policies, such as school enrollment policies, affect a student's ability to attend a proficient school. Which protected class groups are least successful in accessing proficient schools?

Dr. Linda Hix, Director of Federal Programs at Lincoln Public Schools (LPS), provided the following response.

> "The labeling of schools as "in need of improvement" and others as "proficient" was part of the Elementary and Secondary Education Act - No Child Left Behind federal legislation. We are now transitioning to new legislation in the Every Student Succeeds Act that gives more decision making to State Departments of Education. The Nebraska Department of Education is in the process of deciding how to measure and support achievement in all schools across the state. Schools who don't meet state achievement expectations will be given extra support. The state plan will be finalized in September 2017."

Students can get permission to transfer into any school in our district that is not already full. A high percentage of families choose to have their children attend their neighborhood school. Students who are homeless or move due to foster care placement are allowed to remain in their current school unless a school change is in the best interests of the student. The Lincoln Housing Authority Resident Advisory Board expressed strong support for LPS school choice policies, especially at the high school level.

Lastly, a member of Urban Development will complete a yearlong LPS citizen academy by spring of 2019. The knowledge gained will help the department with further analysis of impediments to fair housing.

Employment Opportunities

Describe any disparities in access to jobs and labor markets by protected class.

HUD Table 12 'Opportunity Indicators, by Race/Ethnicity' displays the Labor Market Index and the Jobs Proximity Index. The Labor Market Index is a measure of unemployment rate, labor-force participation rate, and percent of the population (over 25 years old) with at least a Bachelor's degree. The Job Proximity Index measures the physical distance between where someone lives and their job, based on race. These two indices combined with *HUD Map 10 'Job Proximity and Race/Ethnicity'* and *Map 11 'Labor Market and Race/Ethnicity'*, show employment opportunity disparities in the region. *HUD Map 10 'Demographics and Transit Trips'* shows the racial demographics and proximity to jobs. *HUD Map 11 'Demographics and Low Transportation Costs'* shows labor engagement and racial demographics.

The Jobs Proximity Index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within the study area, with larger employment centers weighted more heavily. Values are percentile ranked and range from 0 to 100. Higher index values suggest better access to employment opportunities. HUD created this index using 2013 Longitudinal Employer-Household (LEHD) data.

The Jobs Proximity Index in the city is more consistent across racial groups than the Labor Market Index. The highest score in the Jobs Proximity index is the Asian or Pacific Islander population with a score of 52.96, while the lowest score is the Native American non-Hispanic population with a score of 44.75. In Lincoln, the Jobs Proximity Index for populations below the poverty line is very similar to those above the poverty line. In fact, all areas increased except for the Hispanic population, which saw a slight decrease from 47.37 to 46.75. The HUD data indicates that all racial groups have reasonable access to jobs. *AI Map 28 'Jobs proximity index, as of 2015'* reflects Lincoln's zoning regulations which limits employment centers and higher access to jobs along commercial corridors and less access in dense residential neighborhoods

In Lincoln, there is a significant difference in the Labor Market Index of white non-Hispanics (74.66) compared to the remaining groups. The index assesses labor market engagement and human capital in terms of educational attainment (i.e. those with a bachelor's degree). The construction of this index doesn't take into many trade skill educations with that level of education. The difference diminishes for those in poverty. *AI Map 24 'Labor Market Engagement (2015)'* helps provide an explanation, showing areas of lower Labor Market Index values primarily in low- to moderate- income areas. These same areas have generally lower levels of educational attainment as shown in *AI Map 29 'Percent of workers, by residence, without a high school degree in 2014'* and lower levels of per capita income as seen in *AI Map 11 'Estimated typical (median) income of a household between 2011-2015*'. However, a low income does not always indicate low labor market participation. Lastly, *AI Map 24 'Labor Market Engagement Index (2015),'* identifies three census tracts (32.02, 31.03 and 18) that are significantly lower than the community averages reported in *HUD Table 12 'Opportunity Indicators by Race/Ethnicity*'. These three tracts have index values of 24 or less. Possible explanations for these low index values vary depending on personal choice and limitations of HUD's index. Again, the construction of this index doesn't take into many trade skill education achievements that are earned at an associate degree level.

AI Map 34 shows areas of substantial unemployment (ASU). ASUs are used to determine the allocation of funds under the Adult and Youth Program Activities of the Workforce Innovation and Opportunity Act (WIOA). An ASU is an area that is composed of any combination of areas and/or census tracts that meets three qualification requirements as set by the Employment and Training Administration (ETA). In general, ASU's are contiguous census tracts with a population of 10,000 and have a 12-month average [not seasonally adjusted] unemployment rate of 6.5% or higher for the reference period. Census Tracts 31.03, 30.02, 30.03, 5, 6, 4, 18 and 17 meet the criteria above. There are no ASUs in Seward County. For comparison, in July of 2017 Lancaster and Seward county's unemployment rate of 2.7% and 2.9% respectively.

This map further illustrates why lower index scores maybe present in the Labor Market Index for some Census Tracts. It is also a useful tool for the Greater Lincoln Workforce Development Board force board as it creates strategies for service delivery in the neediest of areas.

Disparities in proximity to jobs and labor market, based on data from HUD, provided similar indices for the Lincoln study area. We recognize the difficulty to get public input pertaining to non-standard shifts (i.e. second and third shifts). Lastly, Lincoln's public transit system limits its operational hours on nights and weekends, which affects the general labor market.

How does a person's place of residence affect their ability to obtain a job?

HUD Table 12 'Opportunity Indicators by Race/Ethnicity -.Job Proximity Indices' indicate there are no barriers to employment based on place of residence. However, a person's place of residence can certainly affect their ability to find a preferred job. Most people like to be fairly close to their place of employment or at least have easy access to an arterial street for the commute to work.

For low-income populations and certain familial status populations, convenient access to the public transportation system is particularly important.

Lincoln's public transportation system recognizes bus transfers are impediments to timely access to locations outside of the core. Before implementation of the new Transit Development Plan, an average weekday transfer wait periods was 30 minutes. Since implementation, there has been improvement. For example, with route improvements and new bus stop rules, total trip time has decreased by 25%-50%. The Transit Development Plan includes five phases of expansion based on public input. The phases are dependent on adequate funding from a variety of sources. When the plan is fully implemented, total trips will increase and transportation costs will decrease.

Which racial/ethnic, national origin or family status groups are least successful in accessing employment?

According to *HUD Table 12 'Opportunity Indicators, by Race/Ethnicity'*, the Native American and Black, non-Hispanic populations are least successful in accessing employment. They have a lower ranking in the Labor Market Index than the city and the study area as a whole. Black, non-Hispanic populations below the poverty line are the group with the most difficulty accessing employment.

Transportation Opportunities

Describe any disparities in access to transportation based on place of residence, cost, or other transportation related factors.

HUD Table 12 'Opportunity Indicators, by Race/Ethnicity' includes information on access to transportation by using the Low Transportation Cost Index and the Transit Trips Index. The Low Transportation Cost Index measures the cost of transportation and proximity to public transportation, and the Transit Trips Index measures how often low-income families use public transportation. *HUD Map 12 'Demographics and Transit Trips'* and *HUD Map 13 'Demographics and Low Transportation Cost'*, show racial demographics and Transit Trips as well as racial/ethnic demographics and Low Transportation Costs.
In Lincoln, the Transit Trips Index score is very similar for all racial/ethnic groups. The highest score is 39.40 for the Native American population and the lowest is 35.07 for the white population. In general, the population below the poverty line is comparable to the total population. The Hispanic population below the federal poverty level has a score of 42.49 (the highest for this index) and the Asian population below the federal poverty level has a Transit Trips Index score of 36.19 (the lowest for this index).

Which racial/ethnic, national origin or family status groups are most affected by the lack of a reliable, affordable transportation connection between their place of residence and opportunities?

The group most affected by lack of reliable, affordable transportation are select groups of new American residents. This group is effected primarily through economic class, language barrier and potential distrust of governmental services (i.e. use of mass transit or broader governmental services). Focus group input from refugee representatives indicated the Karen population is slow to adapt to motor vehicle use. This population prefers areas near bus routes and within walkable distances to services. They also noted the Iraqi population adapts more quickly to motor vehicle use and support systems.

Describe how the jurisdiction's and region's policies, such as public transportation routes or transportation systems designed for use personal vehicles, affect the ability of protected class groups to access transportation.

Lincoln's public transportation system does not operate outside of the city limits and has limited night and weekend service. The regional transportation network is primarily designed for personal vehicle use. Lincoln has an active recreational community who uses its road network and bike/walk trail system, and is active in its development (i.e. Great Plains Trail Network, BicycLincoln etc.)

Lincoln's public transportation system is designed with a single common hub located downtown. This is convenient for some, but can increase commute times for riders with non-downtown destinations. While the system is very beneficial to core residents or those working in the city core, the current route configuration limits timely transportation for those not living or working in the core of the city. Because of trip duration or stress, residents may experience limits on their choice of housing or employment. Ideally, lower-income housing opportunities should be in a walkable/bicycle friendly environment with easy access to public transportation.

Low Poverty Exposure Opportunities

Describe any disparities in exposure to poverty by protected class groups.

HUD Table 12 'Opportunity Indicators, by Race/Ethnicity' includes the Low Poverty Index, which uses rates of family poverty by household to measure exposure to poverty. A higher score generally indicates less exposure to poverty and a lower score generally indicates high exposure to poverty. *HUD Map 12 'Low Poverty Index by Race/Ethnicity'* displays racial/ethnic demographics and poverty rates.

In Lincoln, there is a variance in exposure to poverty based or racial/ethnic demographics. In the population as a whole, the nonwhite population has a lower score (ranging from 40.54 to 47.88). The white population has a score of 61.95, which means they have less exposure to poverty. This matches what we see in *HUD Map 12* where the areas of higher nonwhite concentrations are also the areas with the greatest poverty.

Unsurprisingly, scores on the Low Poverty Index are lower across all racial/ethnic demographics for the population below the federal poverty line for the city of Lincoln. The black and Hispanic population below the poverty line has the lowest score with 25.59 and 20.84 respectively, and the white and Asian populations have the highest scores with 40.35 and 43.12, respectively. In the region as a whole, scores are generally consistent with the overall trend, but the same racial disparity exists.

What role does a person's place of residence play in their exposure to poverty?

For housing: location, quality, poverty and health are so intertwined that it's difficult, if not impossible, to separate cause from effect when considering their impact. Lack of affordable housing can force families to make hard budget decisions about food, transportation, and health care. Poverty, the 'cause of causes' for poor health, often means that people will live, work, and play in environments that are unhealthy and unsafe. Poverty also creates toxic stress that can harm both mental and physical health, especially in young children.

The concentration of poverty affects other aspects of household life as well. For example, a parent-teacher organization (PTO) of an elementary school in a high poverty area has fewer parents who have time to participate -- working two jobs to make ends meet doesn't leave much time for family and even less for a PTO. If most households in the school's area are struggling financially, the PTO won't be able to raise as much funding for extra school activities as a PTO in a high-income area. That limits student experiences and, in some cases, student potential.
In Lincoln, the Community Health Endowment's recent "Place Matters – More Than Ever" Community Mapping Project showed that in the areas of the city where poverty is the highest, women are less likely to receive prenatal care in the first trimester,

access to healthy food is lower, childhood obesity is higher, and there is a lower concentration of primary health care providers. From the lowest poverty index areas to the highest, life expectancy across the city varies more than 20 years.
This assessment affirms that health is more than healthcare. Because residents of high poverty neighborhoods often do not visually see healthy food stores, doctor's offices, or fitness facilities in their neighborhoods, they are less likely to receive subliminal messages that their health is important.

Which racial/ethnic, national origin or family status groups are most affected by these poverty indicators?

HUD's Low Poverty Index, as of 2015, is based on the poverty rate and the values range from 0 to 100, with the highest scores signaling less exposure to poverty in a neighborhood. The lower the income in an area, the more likely they are housed in and are exposed to areas with a Low Poverty Index. This facet is evident across all races above the poverty level. Yet, minorities, which have roughly equal index assessments, are at a greater risk of being exposed to poverty. The index scores for black (41), Hispanic (45), Asian (49) and Native American (44) are lower than the white (65). This exposure to poverty increases for those beneath the poverty level across all races; however, as before the disparity affects minorities more. The index scores for the races below poverty are Black (26), Hispanic (22), Asian (44), Native American (35), and white (43).

Areas with high poverty levels/lower Poverty Index scores are largely within the 1950's boundary of Lincoln, and also contain a majority of both Lincoln's and the study area's minority population. These same areas have the greatest concentration of affordable housing, the lowest household median incomes, and the highest density of population within the city and study area. Households having limited economic resources and needing affordable housing may find their geographic choices limited and the concentration of low-income households becomes self-reinforcing when they lack housing choice.

For further insight into this concentration, we turn to the AI Community Survey for input. When we examined responses from those who indicated they lived in in the 68503 zip code -- a zip code within the core of the City of Lincoln -- in question #3 we see a minority response rate three times the city average to the question 'What is your race or cultural background'. However, there was no clear and consistent answer to question #82 'Why do you think these concentrations exist for each group in your neighborhood'. Combining both 'I don't know' and 'personal choice to live there' no one protected category stated that they lacked choice: White (92%), Black (80%), American Indian (83%), Asian (86%), Hawaiian (87%), other (88%), color (85%), familial status (87%), male (96%), female (94%), and disability (84%). Due to the limited number of respondents who selected Hispanic in this zip code, this assessment cannot assess this ethnicity.

These survey results were taken into consideration, along with focus group discussions and institutional knowledge, to determine that these groups live in their area due to choice, for its affordability, and proximity to other community assets.

Describe how the jurisdiction's and region's policies affect the ability of protected class groups to access low poverty areas.

The availability of affordable housing is the driving force determining where lower-income people live in Lincoln. Protected class groups with higher incomes have many options to pursue housing in low poverty areas, while lower income households have more limited options.

Beginning with the construction of Wood Bridge Apartments in 1997, the Lincoln Housing Authority has followed a development plan to build new affordable rental housing in higher income areas of the city where there is less likely to be intentionally affordable rental housing available to the lower-income population. This plan has resulted in three new affordable rental properties built in newer neighborhoods in south Lincoln - Wood Bridge, Summer Hill, and Prairie Crossing.

The availability of funding is probably the largest contributing factor impacting the location and occupancy of affordable housing. No new funding is available to create more Publicly Supported Housing within this jurisdiction. The one Publicly Supported program that offers low-income individuals and families an opportunity to live anywhere within the city of Lincoln is the Section 8 Housing Choice Voucher (HCV) program. Because the HCV program determines maximum housing subsidy through HUD's established Fair Market Rents, the program participants are often geographically limited to areas of Lincoln with affordable housing. HUD establishes Fair Market Rents by using the bottom forty-percent of the community's rental market. The rental units within the Fair Market Rent (FMR) range tend to be located in the older, core parts of the city. This concentration is a function of the way HUD funds the program.

The Low Income Housing Tax Credit Program is a critical funding tool for new affordable rental housing, although few tax credit units have been awarded to Lincoln in recent years. Tax Credit properties located outside of the city's core are considered affordable housing, yet their rent rates typically exceed HUD's FMR range. The result is a reinforcement of the tendency to concentrate affordable housing options in the city's older, core areas. Lincoln Housing Authority can increase payment

standards for the HCV program up to 110% of the Fair Market Rent. However, making this policy decision would restrict the number of extremely or very low-income individuals and families that can be served because the funding available for the LHA HCV program is limited. As it is, there is never enough funding available to fully support the number of vouchers at 100% Fair Market Rents. There is already a waiting list with over 4,000 households. Each year the voucher program continues to be insufficiently funded. The situation is made worse when local FMRs do not keep pace with the inflation of local rental rates, effectively freezing the number households that can be served.

Environmentally Healthy Neighborhood Opportunities

Describe any disparities in access to environmentally healthy neighborhoods by protected class groups.

HUD Table 12 'Opportunity Indicators, by Race/Ethnicity' includes the Environmental Health Index which measures exposure based on EPA estimates of air quality, carcinogenic, respiratory and neurological toxins by neighborhood. *HUD Map 13 'Demographics and Environmental Health'* shows residency patterns of racial/ethnic and national origin groups and families with children overlaid by shading showing the level of exposure to environmental health hazards for the jurisdiction and the region.

Within the City of Lincoln and the study area there is little variation among racial/ethnic groups in Environmental Health Index scores. The highest score in Lincoln is the white population at 61.67, and the lowest is the Hispanic population at 57.54. The scores also do not change significantly when isolating the population below the federal poverty line. The Native American population has the highest score, 61.08, for groups below the poverty line, and Hispanics have the lowest at 57.30.

HUD Map 13 'Demographics and Environmental Health' does not show any particular pattern of disparity in access to environmentally healthy neighborhoods by race/ethnicity, national origin, or households with children. The marginally lower scores are within older portions of the city and have no connection with race, ethnicity or national origins locations.

Which racial/ethnic, national origin or family status groups have the least access to environmentally healthy neighborhoods?

The Hispanic population has slightly less access to environmentally healthy neighborhoods based on the index scores. The difference among groups is very small and does not show disproportionate access.

Patterns in Disparities in Access to Opportunity

Identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors based on race/ethnicity, national origin or familial status. Identify areas that experience an aggregate of poor access to opportunity and high exposure to adverse factors. Include how these patterns compare to patterns of segregation and R/ECAPs.

In general, the older central core area of Lincoln have a higher concentration of rental housing, higher concentrations of poverty, and lower HUD index scores that assess access to opportunity. *AI Maps: 23 'Low Poverty Index', 24 'Labor Market Index'* and *30 'Elementary School Proficiency Index'* support this statement. These areas are often located within the HUD-identified low- to moderate-income area as seen in *AI Map 31 'LMI eligibility status'*. Additionally, older central core areas also have higher levels of persons who do not have a high school degree, which is explored in *AI Map 29 'Percent of workers, by residence, without a high school degree in 2014'*.

The challenges of persistent poverty are real. Persistent poverty is identified in *AI Map 6 'Concentrated persistent poverty, as of 2014'*. Those areas are defined as tracts having had 20% or more of its population living in poverty over the past 30 years. These tracts are located within the central core, which includes and surrounds downtown Lincoln. While these areas are predominantly white, they also tend to have a larger nonwhite population, a greater number of persons who are foreign born, and contain a higher density of students engaged in higher education opportunities.

While the general core has its own unique challenges, it also has unique strengths. *AI Map 25 'Environmental Health Index'* shows limited disparities through the community. *AI Map 26 'Low Transportation Cost'* shows index values of transportation cost estimates for a 3-person single-parent family with income at 50% of the median income for renters of the study area. The higher the index score, the lower the transportation costs in that neighborhood. Low transportation costs can be indicative of many factors, such as good access to public transportation or a high density of homes, services, and jobs in and around a neighborhood. Higher values of this measure are located within the core of the community.
AI Map 27 'Transit Trips Index' estimates transit trips taken by a 3-person single-parent family with income at 50% of the median income for renters for the region. The higher the index score, the more likely residents in that neighborhood utilize

public transit. The index controls for income such that a higher index value often reflects better access to public transit. Again, higher index levels are generally within the core.

AI Map 28 'Job Proximity Index' is especially telling. This index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a study area, with larger employment centers weighted more heavily. Values are percentile ranked and range from 0 to 100. Higher index values suggest better access to employment opportunities for the residents of that block group. HUD created this index using 2013 Longitudinal Employer-Household (LEHD) data. This index tells us our residential core areas have better access to employment opportunities than newer less dense neighborhoods. Additionally, it show us that higher index values are located along commercial corridors and near nodes of employment. This is reasonable and is in line with Lincoln's *Comprehensive Plan*.

In conclusion, there is no overarching patterns of significant impediment to access or opportunity. Areas with challenges are also areas with great strengths.

b. Additional Information

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.

All of the focus groups discussed concentrations of people, quality of neighborhoods and the type of public or private investments they need/want. All of the focus groups agreed the primary determinant of where people live in Lincoln is their level of income. The greater one's income, the greater array of choices and areas that are attainable. Many areas of Lincoln have a limited supply of affordable housing, particularly in the southern part of the city.

Focus group participants provided a variety of comments on neighborhoods and needed services. The primary theme related to access to opportunities revolved around the availability of transportation. Lincoln's transportation network is primarily designed for the use of personal vehicles. Recent trends have led to the movement of more services such as grocery stores and medical clinics away from neighborhoods and toward main arterials, which limits accessibility for some people.

The location of bus routes and stops also necessarily limits where some people are able to live, particularly disabled people, and their ongoing ability to access transportation to employment or other services. All focus groups also expressed a need for increased levels of sidewalk repairs and improvements to improve walkability, particularly for persons with mobility limitations. Lincoln Public Schools garnered strong support for their efforts in neighborhood schools, highlighted by their support for immigrant families and their school choice policies.

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).

The availability of affordable housing is the driving force of where lower income people live in Lincoln. Beginning with the construction of Wood Bridge Apartments in 1997, the Lincoln Housing Authority has followed a development plan to build new rental housing in areas of the city where there is less likely to be intentionally affordable rental housing available to the lower-income population. This plan has resulted in three new affordable rental properties built in newer neighborhoods in south Lincoln - Wood Bridge, Summer Hill, and Prairie Crossing.

Lincoln Housing Authority owns a significant amount of rental property in the Arnold Heights neighborhood in northwest Lincoln. To better serve the neighborhood, LHA owns and operates a Family Resource Center and is the lead agency for the Arnold Elementary School Community Learning Center (CLC). The NW 48th Neighborhood Advisory Council, coordinated by the Arnold CLC/LHA, has been working with a community-wide collaboration called "Prosper Lincoln." Their goal over the past year has been to build an employer collaborative that will help bridge the gap between local employers who have job openings and neighborhood residents looking for jobs with career advancement. Current employer partners include Duncan Aviation, Kawasaki, and Lincoln Industries. A model and pilot project are being developed that will provide training and certification through the Arnold CLC and the Family Resource Center to help move local residents from part-time work to full-time careers. The City of Lincoln uses federal entitlement funding to assist lower-income homeowners and first-time homebuyers using federal entitlements, specifically Community Development Block Grant (CDBG) and Home Investment Partnership Program (HOME). The federal goal for CDBG is "… developing viable urban communities, by providing decent housing and a suitable living environment and expanded economic opportunities… for low- to moderate-income persons." HOME funds are focused on housing for low- and moderate-income households. The majority of CDBG and HOME funds are used for housing rehab and

homeownership programs administered by the City of Lincoln Housing Rehabilitation & Real Estate Division. However, some CDBG funding, administered by City of Lincoln Community Development staff, is used for projects in low- to moderate-income neighborhoods — such as park improvements and neighborhood commercial area streetscapes. In addition, Urban Development staff directly supports the Mayor's Neighborhood Roundtable, the Neighborhood Hotline, and provides a variety of web resources for neighborhood associations.

The City of Lincoln Community Development staff facilitates and supports Lincoln's Homeless Coalition. The Coalition serves Lincoln's homeless and near homeless families and individuals. Coalition member organizations apply annually for ESG funding through the City of Lincoln. Locally, ESG dollars are used for operating costs of local shelters and homeless programs, homeless prevention activities (payment of rent and utility arrearages for persons facing eviction), and homeless client services. Coalition agencies also receive funds through the State of Nebraska's Homeless Shelter Assistance Trust Fund (HSATF). The City of Lincoln has been given the responsibility of recommending allocations of HSATF monies to Lincoln providers.

Tax Increment Financing (TIF) is a local funding tool used by the City to support redevelopment opportunity. This tool supports private development in areas of the community that have an active redevelopment plan in place. The redevelopment process — blight studies, plans, redevelopment agreements, and implementation — requires substantial involvement by city staff. City of Lincoln staff works with redevelopment efforts throughout the community.

Lastly, in early 2015 StarTran launched the Transit Development Plan (TDP), an effort to determine the best approach for improving and expanding transit service in Lincoln. This study included a comprehensive evaluation of the entire transit system. An extensive outreach effort was made to engage the community and determine the needs and preferences of customers. As a result of the TDP, evening service will be expanded on key routes, service frequency will be increased, and direct service routes will be added. More information on the TDP improvements can be found at lincoln.ne.gov Keyword: TDP or by contacting the city directly.

c. 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.

- The availability, type, frequency, and reliability of public transportation
- Location and type of affordable housing
- Private discrimination

d. Contributing Factors of Disparities in Access to Opportunity – Other

N/A

4. Disproportionate Housing Needs

a. Analysis

Which groups (by race/ethnicity and family status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups? Which groups also experience higher rates of severe housing burdens when compared to other groups?

HUD Table 9 'Demographics of Households with Disproportionate Housing Needs' defines housing problems as incomplete kitchen facilities, incomplete plumbing facilities, more than one (1) person per room or a cost burden greater than 30%.

Within both the City of Lincoln and the study area, the percentage of households experiencing any of the four (4) housing problems is broken into three groups along racial/ethnic lines. Two racial/ethnic populations have high rates of experiencing housing problems -- Native American (56.61% in the City of Lincoln or 55.74% in the study area) and black (50.14% in the City of Lincoln or 55.24% in the study area).

Both the City of Lincoln and the study area experience housing problems at comparable levels, 30.27% and 29.03% respectively. Three racial/ethnic populations experience slightly more housing problems than the average overall area population; other (39.33% in the City of Lincoln or 37.55% in the study area), Hispanic (39.24% in the City of Lincoln or 39.16% in the study area),

and Asian or Pacific Islander (38.17% in the City of Lincoln or 37.94% in the study area). The population group experiencing the fewest housing problems is white with 28.55% in the City of Lincoln or 27.41% in the study area.

Large households (5 plus people) and non-family households are more likely to face housing problems. Non-family households are more likely to experience housing problems than other household types and sizes with a rate of 40.62% in Lincoln or 40.03% in the Region. The large households or families with five or more people experience housing problems at a rate of 32.30% in the City of Lincoln or 30.98% in the study area. Households or families with less than 5 people experience the fewest housing problems at 21.92% in the City of Lincoln or 20.99% within the study area.

For populations facing severe housing problems, the racial and ethnic populations broke down into the same three groups. The two racial/ethnic populations with the highest percentage experiencing severe housing problems are Native American (32.50% in the City of Lincoln or 32.01% in the study area) and black (33.53% in the City of Lincoln or 33.27% in the study area). The average percentage of households who experience severe housing problems in the area is 14.51% in the City of Lincoln and 13.66% in the study area. Three other racial/ethnic groups have a higher than average percentage experiencing severe housing problems compared to the average overall area population: other (23.76% in the City of Lincoln or 22.68% in the study area), Hispanic (22.26% in the City of Lincoln or 22.40% in the study area), and Asian or Pacific Islander (20.15% in the City of Lincoln or 20.14% in the study area). The lowest population group experiencing severe housing problems is white with 13.01% in the City of Lincoln or 12.27% within the study area.

HUD Table 10 'Demographics of Households with Severe Housing Cost Burden' defines severe housing problems is defined as spending greater than 50% of income on housing costs.

There is some variation among racial and ethnic populations when it comes to severe housing cost burdens. The Asian or Pacific Islander populations experience severe housing cost burden at the lowest rate of 10.53% in the City of Lincoln and 10.52 % in the study area. The white population is close behind at 11.77% in the City of Lincoln and 11.11% in the study area. There are three racial/ethnic population groups, with similar rates, that experience the highest rate of severe housing cost burdens within the City Lincoln or the study area respectively; black (28.28%, 28.07%), Native American (26.44%, 26.03%) and other (24.27%, 23.17%). The Hispanic population experiences severe housing cost burdens at 17.41% in the City of Lincoln and 17.15% within the study area.

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?

HUD Map 6 'Housing Burden and Race/Ethnicity or National Origin' shows there are no clear residential living patterns that directly connects housing burden (problems) with a single race or ethnicity. However, there are areas within Lincoln that tend to have higher housing problems. In fact, most of the higher Housing Burden areas tend to be in locations with a high density of rental units and/or close to a university or college such as Union College, Wesleyan, or the University of Nebraska. Census Tract 6 is predominantly the University of Nebraska campus and has the highest population experiencing housing problems. The 2010 data in the *HUD Map 6* shows 100% of the households residing in Census Tract 6 experience at least one of the 4 housing problems; incomplete kitchen, incomplete plumbing facilities, more than 1 person per room and cost burden greater than 50%. The demographics for Census Tract 6 is 87.66% white, non-Hispanic, 3.02% black, .37% Native American, 2.51% Asian, 4.74% Hispanic.

HUD Map 6 shows there is no clear residential living patterns that directly connects the housing burden problems areas with a specific household national origin. Higher housing burden areas tend to be in locations with a high density of rental units and/or close to a university or college such as Union College, Nebraska Wesleyan, or the University of Nebraska.

In census tracts just east of Census Tract 6, 38.59%-56.86% of the population is experiencing housing burdens. Chinese and Vietnamese nationalities are among the more populous nationalities in these census tracts. There are significant numbers of Chinese and Asian foreign students who move to Lincoln to attend the University of Nebraska. Furthermore, *HUD Map 6* shows the majority of the Chinese tend to reside in areas surrounding the University of Nebraska campus, which are also high housing burden areas.

HUD Map 6 indicates people from Mexico, in general, are more likely to settle in the area south of downtown and in parts of northwest Lincoln, such as the Belmont neighborhood. These areas tend to be high-density rental neighborhoods with higher housing burdens.

HUD Map 6 also shows the households with Indian origins tend locate in areas of the city of Lincoln with lower housing burden. Iraqi and Vietnamese households settle throughout the city, but typically north of Van Dorn Street and west of 56th Street; an area which includes a mixture of low to moderate housing burden census tracts.

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.

HUD Table 11 'Publicly Supported Housing Program Category; Unit by Number of Bedrooms and Number of Children' displays the publicly supported housing programs and properties in Lincoln. *HUD Table 11* shows that there are many bedroom options to accommodate different family sizes through a variety of subsidized housing properties and programs. The current Public Housing stock provides 56.25% of its housing to families with children. Lincoln's Public Housing jurisdiction has 86.4% of the 198 two-bedroom or larger units occupied with children. The project-based Section 8 housing in this jurisdiction predominantly provides housing for the elderly and disabled -- 75.35% of these units have one-bedroom or less. There are 192 project-based households with children who occupy 75.6% of the 254 units with two bedrooms or more. The Housing Choice Voucher households are evenly distributed among the various units sizes; 28.08% for households in zero to one-bedroom units, 37.43% for households in two-bedroom units, and 31.78% for households in three-bedroom units or larger. This unit size disbursement is somewhat reflective of the local program's waiting list. *HUD Table 11* shows 1,403 Housing Choice Voucher households have children residing in units with two bedrooms or larger which is 79.6% of the voucher units with two bedrooms or larger (1,762 units).

Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.

Within the City of Lincoln, there is a modest difference in the rates of owner-occupancy by race and ethnicity. According to the 2010 Census American Fact Finder Table '*Qt-H1 General Housing Characteristics*', the white population makes up 82.68% of the total population, but 92.9% of the owner-occupied housing . The black population is 3.84% of the total population and 1.2% of the owner-occupied housing. The Asian-Pacific Islander population is 3.91% of the total population and 2.3% of the owner-occupied housing. The Hispanic population is 6.38% of the total population and 2.7% of the owner-occupied housing.

In Seward County an even higher percentage of the white population, make up the owner-occupied housing at 98.4%. Lancaster County's rate of white owner-occupied housing is at 93.6%, which is slightly above the City of Lincoln. The rate of renter housing by race and ethnicity matches the total population proportions.

b. Additional Information

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.

Each of the focus groups discussed issues of housing quality and the need for investments that could improve livability and address disproportionate housing needs. All focus groups noted a shortage of affordable housing throughout the city -- either to rent or to buy -- and that prices have been rising dramatically in recent years. Respondents to the Community Survey indicated and several focus groups noted that affordable 3+ bedroom units were the most difficult to find. Other focus group comments included:

- New housing units should be designed for life-long living with barrier free access for an aging population.
- There is a need for three bedroom units.
- The current strong demand in the rental market allows landlords to rent units without making needed improvements. There is no financial incentive to keep rental properties well maintained.
- Rental properties not inspected by LHA's Voucher Program are in poorer condition. LHA housing inspections have a positive impact in the quality of units.
- There is a need for more homeowner rehabilitation funding to help people stay in their homes longer.
- Affordable and accessible housing needs to be spread throughout the city and not all concentrated in the core area.
- The Karen community is more likely to be living in poorer quality housing. Culturally, they care more about living in a close community than the quality of housing or being overcrowded. They are also less likely to complain about conditions.
- There is a need for creative redevelopment of mobile home parks, which are affordable but often substandard. The concept of a cooperatively run management structure was specifically noted.

- There is a need for more security deposit assistance to help lower income household's lease-up.

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.

Across the city, the following housing needs have been identified as impacting publicly supported housing units.

1. Many property owners have a "NIMBY" perspective on assisted housing, which limits the development of affordable housing outside of the core neighborhoods. Recently LHA attempted to purchase land near 84th and South in an attempt to build more affordable housing outside the core of the city. The neighbors' resistance to the project resulted in storage units being built rather than affordable housing, even though the area has a high need for affordable rental units.
2. Rental property demands have increased, resulting in extremely low vacancy rates, increased rental rates, and a shortage of affordable housing. For two consecutive years (2015 & 2016), Fair Market Rents have increased by 5% to 13%, illustrating the ongoing increases in rental rates.
3. Increases in market rent have also been rising in areas where there has been new multifamily developments and in traditional northern core neighborhoods (i.e. Malone, Hawley and Clinton). This reflects the demand in rental housing. Market rates have increased by 20% or more in some areas and decreased by 5% or less in others. *AI Map 32_P 'Median Rent Change'* shows the estimated percent change in the median gross rent for rental units with cash rent between the periods of 2006-2010 and 2011-2015. Gross rent is the contract rent plus the estimated average monthly cost of utilities (electricity, gas, water and sewer) and fuels (oil, coal, kerosene, wood, etc.) if these are paid by the renter (or paid for the renter by someone else).
4. There is a lack of affordable housing within the city of Lincoln. Low Income Housing Tax Credit projects are the only affordable rental properties being developed in higher income areas and outside the core of the city. While there has been a surge in development of new rental units designed to serve students and higher income households, the last LIHTC development was built in 2014. There is a new project under construction that will serve homeless or near homeless veterans. LHA continues to have long waiting lists for affordable housing, with wait times varying from two to five years. At the end of FY 2016, over 3,800 families were on the Housing Choice Voucher waiting list, 781 families were on the Public Housing Waiting list and another 156 elderly were on a site-specific waiting list.
5. Public Housing and Housing Choice Voucher (HCV) programs continue to experience yearly budget reductions, while the cost of providing subsidized housing continues to substantially increase with local market trends. For example in calendar year 2015, the HCV program funding only supported 2707 households even though the Housing Authority was authorized 2916 vouchers.

c. 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 disparities in access to opportunity.

- The availability of affordable units in a range of sizes
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Land use and zoning laws (Mobile Home Vitality, Code Enforcement)

d. Contributing Factors of Disproportionate Housing Needs – Other

N/A

E. Publicly Supported Housing Analysis

1. Analysis

a. *Publicly Supported Housing Demographics*

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))?

HUD Table 6 'Publicly Supported Housing Residents by Race/Ethnicity' lists statistics for three categories of publicly supported housing (Public Housing, Project-based Section 8, and Housing Choice Voucher HCV). Blacks are more likely to reside in Public Housing or HCV (20.4% and 19.66%) than in Project-based Section 8 (9.51%), although all three programs serve a higher proportion than the general population. Asians are more likely to be served by the HCV program (3.59%) than Public Housing or Project-Based Section 8 (1.00% and 0.67%). Whites are slightly more likely to reside in Project-based Section 8 (83.67%) than Public Housing or HCV (74.92% and 69.05%). All three categories serve Hispanics (3.01%, 4.61%, and 4.85%) at fairly similar rates.

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.

Race/Ethnicity

HUD Table 6 'Publicly Supported Housing Residents by Race/Ethnicity' lists race/ethnicity statistics for three categories of publicly supported housing (Public Housing, Project-based Section 8, and Housing Choice Vouchers HCV). The race/ethnicity demographics of all three categories generally reflect the proportions of the population groups in the extremely low-income category (30% of AMI). The order in that category is whites (77.58%), blacks (7.18%) Hispanics (6.79%) and Asians (4.48%). All three housing program categories serve primarily whites (74.92%, 83.67%, 69.05% respectively), followed by blacks (20.40%, 9.51%, 19.66% respectively), Hispanics (3.01%, 4.61%, 4.85% respectively), and Asians (1.00%, 0.67%, 3.59% respectively). In this analysis, blacks are somewhat overrepresented in all three programs, while whites (except in project-based Section 8), Hispanics and Asians are somewhat underrepresented. However, the order of percentages are the same in all three-program categories, matching the order of the 30% of AMI group. The over-representation of blacks could be a reflection of their Disproportionate Housing Needs (*HUD Table 9*) and Housing Cost Burden (*HUD Table 10*) relative to whites, Hispanics and Asians.

The order of the general population *(HUD Table 2*) differs from the extremely low-income group with whites making up a higher percentage (85.01%) followed by Hispanics (5.61%), Asians (3.34%) and blacks (3.21%). Native Americans, making up only 0.57% of the general population, were not included in *HUD Table 6* and so are not included in this analysis.

Elderly

According to the *HUD Table 2 'Demographic Trends'* in 2010, elderly persons aged 65+ made up 10.97% of the population in Lincoln. *HUD Table 7* shows the elderly make up a much larger percentage of residents in publicly supported housing compared to the general population: 31.91% of the Public Housing units, 59.29% of the Project-based Section 8 units in non-R/ECAP census tracts, and 78.26% of the Project-based Section 8 units in the Census Tract 7 R/ECAP. For the Housing Choice Voucher (HCV) program, only 14.56% of the voucher participants were elderly and residing in non-R/ECAP census tracts. Within the R/ECAP census tract 7, there are 47 HCV assisted units with 20.51% being an elderly voucher participant. Again, this is slightly higher in proportion to Lincoln's population composition (10.97%) of elderly.

It should be noted that *HUD Table 2* uses age 65 or older as a definition of elderly, while the publicly supported housing programs define elderly at 62 or older. The fixed Publicly Supported Housing is mostly designated as elderly; therefore, it pre-determines their residential area and the number and percentage of the elderly publicly supported housing tenants living in R/ECAP areas. Whereas, the voucher program provides the participant the freedom of residential choice, so the percentage of elderly with voucher assistance living in the R/ECAP area tends to be more reflective of the general population.

Disabled

The evaluation of disability type within *HUD Table 1*, which is the same data as *HUD Table 13*, informs us on average 3% of Lincoln and study the area has a form of disability. An average of 87% of those with a disability live within the Lincoln jurisdiction. On average, the percentage of disability by type for both reviewed areas is as follows; hearing difficulty 3.25%, vision difficulty 1.73%, cognitive difficulty 3.56%, ambulatory difficulty 4.9%, self-care difficulty 1.82% and independent living difficulty at 3.38%. The HUD data table does not indicate if these are unique counts. This means one person could identify themselves as having several disability types. Persons with a disability made up a larger percentage of the publicly supported housing population in both the R/ECAP census tract and the non-R/ECAP census tracts. *HUD Table 7 ' R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category'* shows persons with disabilities live within 15.46% of the Public Housing units, 26.06% Project-based Section 8 units and 21.34% Housing Choice Voucher(HCV) units located in non-R/ECAP tracts. It also shows persons with disabilities who live in RECAP tracts include 26.06% of the Project-based Section 8 units and 33.33% HCV units. It should be noted there are only 93 publicly supported housing units occupied in the R/ECAP census tract.

Families with Children

According to the HUD's Table 2- Demographic Trends in 2010, families with children made up 47.37% of the City of Lincoln's population or 46.84% of the study area. Looking at residents living in publicly supported housing, *HUD Table 7 'R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category*' shows a slightly larger percentage of families with children living in Public Housing units (56.25%) and living in Housing Choice Voucher units (55.4%). Fewer families with children live within the Project-based Section 8 housing units (18.88%).

b. *Publicly Supported Housing Location and Occupancy*

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.

Housing Choice Voucher

HUD Map 5 'Housing Choice Vouchers and Race/Ethnicity (Housing Choice Vouchers and Race/Ethnicity)'
The largest voucher concentration areas by census tract are in Census Tracts 30.01 and 31.03. In Census Tract 30.01, 27.48% of households utilize voucher assistance, while 22.56% of Census Tract 31.03 households utilize voucher assistance. Rental units in these census tracts are affordable and likely less desirable to college students. There are several Tax Credit properties and former Tax Credit properties that may also contribute to a higher voucher concentration in these two census tracts. Low Income Housing Tax Credit properties are required to accept Housing Choice Vouchers and the units are typically newer and in better condition compared to other units within the same rent range. They also have restrictions on renting to college students.

Overall, the concentrated voucher areas tend be where Tax Credit properties are located. Within the City of Lincoln, voucher units tend to be more concentrated north of A Street. The HCV voucher residences are mostly proportionate to the race and ethnicity of the city's general population. However, Census Tract 31.03 has a high concentration of voucher residents (22.56%) which has a higher Hispanic population concentration (29.29%).

R/ECAP area Census Tract 7 also stands out as a high Asian minority concentration area because 34.1% of the population is Asian/Pacific Islander. However only 6.35% of the households in Census Tract 7 have vouchers. As stated previously, this may reflect a concentration of international students attending the University of Nebraska.

Public Housing

LHA operates 320 public housing units. Of those, 120 are located in one senior high rise, Mahoney Manor, which is located in the Havelock neighborhood and Census Tract 1. That census tract is 89% white and is not a minority concentrated area. The other 200 are two-, three-, four-, and five-bedroom units of scattered site single-family or duplex units. These units were built in the 1970's (or before) and are scattered throughout the neighborhoods in existence at that time. They are not concentrated in any particular area.

Project Based Section 8

There are several developments scattered across the city; however, most are located in areas north of downtown (and south of Interstate 80) or just south of downtown. As such, most are located in areas with higher minority populations and higher rental unit concentrations. Malone Manor is a project-based Section 8 with 46 units in Census Tract 7, which is a R/ECAP area. Malone Manor's resident population is disproportionate to the population in Census Tract 7. Specifically Malone Manor has 20% Black households compared to 6.85% in Census Tract 7. Malone Manor has 0% Asian households compared to 34.1% in Census Tract 7.

Low Income Housing Tax Credit (LIHTC)

The location of LIHTC properties is critical in determining where housing opportunities exist for Housing Choice Voucher holders. Similar to Project based Section 8 properties; most of the LIHTC properties are also located north of downtown and south of Interstate 80. Lincoln Housing Authority has made a concerted effort to develop LIHTC properties in areas of opportunity in far south Lincoln, where there is significantly less affordable rental housing available. LHA has developed three properties offering 342 units of affordable rental housing in south Lincoln: Wood Bridge, Summer Hill, and Prairie Crossing.

HUD Table 7 illustrates that the percentage of publicly supported units in the Census Tract 7 R/ECAP is very small, and those units do not seem to play a significant role in that area. Overall, the HUD maps show Lincoln as having low levels of segregation of any one-minority group.

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?

HUD Table 11 'Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children' provides data for Publicly Supported Housing in the City of Lincoln only. *HUD Table 7 ' R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category'* indicates that the percentage of publicly supported units in the Census Tract 7 R/ECAP is very small, and those units do not seem to play a significant role in that areas.

Project-based Section 8 Housing

The Project-based Section 8 Housing is spread throughout the city of Lincoln with the majority of the units located in the Northwestern quadrant of the city, west of 27th Street and north of O Street. *HUD Table 11* shows that 75.35% of the Project-Based Section 8 Housing units in Lincoln are 1 bedroom or smaller, so they primarily serve the elderly and disabled. Only 18.06% of the Project-based Section 8 Housing units serve families with children. This coincides with only 23.9% of the Project-based Section 8 units being 2 bedrooms or larger. There is only one Project-based Section 8 Housing development in the Census Tract 7 R/ECAP area, which is Malone Manor, with 48 units designated for the elderly. *HUD Map 5* also shows small elderly housing developments in Seward, Utica, and Milford.

Public Housing

There are 320 total Public Housing units in Lincoln. No Public Housing units are located in the Census Tract 7 R/ECAP area. There is one 120-unit high-rise building, Mahoney Manor that serves the elderly and disabled and is located in the Havelock neighborhood (Census Tract 1). The remaining 200 units are 2, 3, 4, and 5 bedroom units available to families with children. These units are scattered throughout the city and are not particularly located in any marginally segregated area. Of the 2+ bedroom units, there are 44 units (22%) with a disabled head or co-head of household residing in the public housing unit.

Housing Choice Voucher (HCV)

Housing Choice Voucher program's jurisdiction is only within the city of Lincoln.

HUD Table 7 shows that the HCV vouchers in Census Tract 7 (R/ECAP area) consists of 20.51% elderly, 33.33% disabled and 35.9% families with children. According to *HUD Table 7,* this reflects only 1.6% of the total HCV households. This is a very small portion of the housing in Census Tract 7 and does not seem to play a significant role for this area.

HUD Table 11 shows 55.11% of the HCV assisted units have families with children. As of April 2017, Lincoln Housing Authority reported that participation in the HCV program included 17% elderly households (62+ years), 41% disabled households (head of household or co-head is disabled) and 42% families with no elderly or disabled head or co-head household member. HUD Table

2 shows Lincoln's population in general has 47.37% families and 10.97% age 65+. Although the HCV percentages are slightly lower for families and slightly higher for elderly, the distribution of HCV household composition types is generally similar to the overall city population.

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?

HUD Table 7 'R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category' shows the percentage of publicly supported units in the Census Tract 7 R/ECAP to be very small. They do not seem to play a significant role in this area.

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? Describe how these developments differ.

The Lincoln Housing Authority has not converted any public housing developments under the Rental Assistance Demonstration (RAD) program. The Low-Income Housing Tax Credit (LIHTC) is a resource for creating affordable housing within the City. Because LIHTC properties are required to participate in the voucher program, they are a valuable resource for Housing Choice Voucher holders looking for safe, decent and affordable housing. The HUD-provided tables do not provide a demographic breakdown of the LIHTC properties.

Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing.

Project-Based Housing

HUD Table 8 'Demographics of Publicly Supported Housing Developments, by Program Category' shows the following. There are two and half times more elderly-disabled designated project-based Housing units within the city of Lincoln than family units. The elderly-disabled project-based units are predominately white. About 42% of the elderly- disabled project-based developments are diversified and relatively consistent with the city demographics of the city. Preston Place (46th and Prescott) has an above average population of Hispanic residents (16%) and Malone Manor (22nd and Vine) has an above average population of black residents. (20%).

There are 4 Project-Based Housing developments whose residents are mostly families with children; New 32 (81%), Glenbrook Townhouses (90%), Fairfield West Townhouses (78%), and Mercy Northglen Apartments (62%).

The following Project-based Housing Developments have resident demographics noticeably different than the City of Lincoln's and study area's overall demographics: The City of Lincoln's overall demographics in 2010 was: 82.6% white, 3.8% black, 3.9% Asian, 0.6% Native American, 6.3% Hispanic, 47.3% families. The study area's overall demographics in 2010 was 85% White, 3.2% Black, 3.3% Asian, 0.5% Native American, 5.6% Hispanic, 46.8% families.

- Mercy Northglen Apartments, 3301 Portia St, 68521 (Census Tract 30.03);
  - 69% white, 23% black, 8% Asian, 0% Hispanic, 62% families.
- Mercy Western Manor, 2206 West Q St, 68528 (Census Tract 33.01) ;
  - 56% white, 33% black, 0% Asian, 7% Hispanic , 44% families
- Garden Apartments (Census Tract 30.03);
  - 70% white, 10% black, 5% Asian, 15% Hispanic, 50% families
- Fairfield West Townhomes, 231 Fairfield St & 3741 Chadd Ct & 3621 N 3rd St 68521 (Census Tract 31.03);
  - 69% white, 23% black, 3% Asian, 3% Hispanic , 78% families
- Glenbrook Townhouses, 1660 Knox St (Census Tract 30.03);
  - 42% white, 33% black, 4% Asian, 19% Hispanic , 90% families

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.

Public Housing

There are 200 Public Housing units, mostly family units, scattered throughout the city. Because the structures are scattered and the number of units in each structure is small, the overall number of units is also small and they do not play a role in the city's demographics. Mahoney Manor is the elderly-disabled designated public housing high rise with 120 units. *HUD Map 5* and *HUD Table 8* show that Mahoney Manor's demographics are similar to demographics in Census Tract 1.

Project-based Housing

The majority of the elderly-disabled project-based developments have residential demographics that reflect the overall population demographic with a few exceptions.

HUD Table 8 'Demographics of Publicly Supported Housing Developments, by Program Category' and *HUD Map 5 'Publicly Supported Housing and Race/Ethnicity'* show Preston Place (46th and Prescott, in Census Tract 27.01) as having an above average population of Hispanic residents (16%) in comparison to census tract's general population (6.52%). Malone Manor (22nd and Vine, in Census Tract 7) is shown as having an above average population of black residents (20%) and below average Asian population 0% as compared to the census tract general population proportions -- black (6.85%) and Asian (34.1%).

The following Project-based Section 8 Housing Developments, which predominantly house residents with children, have noticeably different demographics than their corresponding census tract. Specifically more residents are black in these project-based units in comparison with their corresponding Census Tract area.

- Mercy Northglen Apartments, 3301 Portia Street, 68521;

  - 69% white, 23% black, 8% Asian, 0% Hispanic, 62% families compared to 30.03 Census Tract: 57.7% white, 10% black, 4.3% Asian, 21.7% Hispanic and 1.29% Native American.

- Mercy Western Manor, 2206 West Q Street, 68528;

  - 56% white, 33% black, 0% Asian, 7% Hispanic, compared to Census Tract 33.01: 82.8% white, 3.13% black, 6.85% Asian, 4.48% Hispanic

- Fairfield West Townhomes, 231 Fairfield Street, 3741 Chadd Ct, 3621 N 3rd, 68521 ;
  - 69% white, 23% black, 3% Asian, 3% Hispanic, compared to Census Tract 31.03: 74.54% white, 4.11% black, 10.07% Asian, 6.61% Hispanic

c. Disparities in Access to Opportunity

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.

Based on location, there are no greater disparities for Publicly Supported Housing residents than what was described in the prior sections regarding access to opportunities for the low-income renting population. However, Publicly Supported Housing residents tend to actually have more access to services that could increase their opportunities in comparison to the rest of the low-income renting population in Lincoln.

2. Additional Information

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.

N/A

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 mobility programs.

a. LHA-Sponsored Programs for Family Self-Sufficiency and Family Support

Family Self-Sufficiency Program

Since 1993, LHA has offered the Family Self-Sufficiency (FSS) Program to families in Public Housing or the Section 8 Rental Assistance Programs. The program helps families work toward becoming financially self-sufficient. Each family works with a caseworker to develop an individualized plan for up to a five-year period. The plan includes the steps that the family will take to reach their goals and the support or help they might need. Families who reach their goals may receive an escrow savings account, which is based on deposits made following increases in rent resulting from increases in earned income. In 1990, LHA established a Down Payment Assistance Program to provide up to $3,750 or 5% of the purchase price of a home. The program is available to qualified clients of the Family Self-Sufficiency Program. The family can receive a no-interest loan up to $3,750 for down payment and closing costs. Principal repayment is required when the family sells or transfers title to the home.

Northeast High School Home Building Project

Since 1994, LHA has sponsored a home building program with Northeast High School. Students build a home to LHA's specifications. An LHA family is selected to purchase or enter a five-year lease-to-purchase program. LHA works with the family to help ensure they are preparing for homeownership. Support services include case management & financial assistance.

Family Support Program

In 1997, LHA created the Family Support Program to assist families served by LHA in changing situations or behavior that threaten household members health, safety, or general family welfare. A case manager provides outreach, assessment, referral, and supportive services. Referrals are made by the general public, other agencies, landlords, neighbors, and LHA staff. A computer database program matches clients with police contact records, so LHA becomes aware of families with high incidents of police contact or singular incidents of a very serious nature. Once a referral is made, the case manager researches the family background, contacts them for a visit, does an assessment, and assists in providing referrals to other agencies. LHA has some financial resources to help family's access services.

Nutrition Education Program

Since September 1992, the Lincoln Housing Authority and Lancaster County Extension Office have cooperated in providing the Nutrition Education Program (NEP). The primary purpose of the program is to provide nutrition and food resource education to families receiving housing assistance from Lincoln Housing Authority. Major topic areas include nutrition, food safety, and budgeting. Funds from LHA support the operation of the program. Programs are delivered in-group or individual settings.

Nebraska RentWise

LHA is a lead partner in the Lincoln RentWise Network, a group of agencies and landlords who offer the Nebraska RentWise program in Lincoln. Nebraska RentWise uses a standardized curriculum and certified trainers to offer a six-module tenant education program to help ensure a successful landlord/tenant relationship. Topics include how to find a rental unit, how to take care of and maintain a unit, how to improve communication and reduce landlord/tenant conflict, how to improve the rental experience, manage money, and information on legal/fair housing rights and responsibilities. Graduates of the program may receive a higher priority on the housing voucher waiting list. Sessions are generally conducted twice a month on the second and fourth weeks of the month.

Moving to Work Demonstration (MTW)

In 1999, Lincoln Housing Authority was one of 23 high-performing housing authorities in the United States selected to implement a federal demonstration project entitled Moving To Work (MTW). The MTW program allows LHA more local control and flexibility in the public housing and housing choice voucher programs by providing waivers from certain provisions of federal housing law. The goals of the demonstration are:

- To increase housing choices for families
- Provide incentives for work
- Increase administrative efficiencies

The initial five-year program has received several extensions and will continue through March 2028. There are currently 39 housing authorities in the United States with MTW programs, and Congress has authorized the expansion of the demonstration project to up to 100 additional agencies.

The Lincoln Housing Authority will continue to use HUD regulatory waivers as a means to achieve the overall goals of the MTW program and provide greater program benefits to Lincoln citizens.

Reading Matters

Beginning in 2017, LHA began promoting reading at home by distributing new and used books to children in low-income families. Part of the promotion is to "Read Aloud 15" in which parents are encouraged to read to their children for 15 minutes per day or listen to their children reading for 15 minutes each day. The program was developed in recognition of the critical importance of grade-level reading by third grade. Reading Matters is supported by donations from LHA employees, LHA residents, community members, city employees, and local and national foundations. Over 3,000 children per year will receive books through the program.

Emergency Assistance Programs

- Discretionary Fund program: LHA provides one-time assistance for subsidized housing program participants and tenants who have unexpected expenses that could jeopardize their ability to maintain their housing, employment or self-sufficiency activities. Examples of expenses that can be paid by this program are childcare, transportation, clothing, moving expenses and vehicle repairs.
- Security Deposit Assistance Program for Homeless Families: In 1997, LHA began a program to provide rental deposit assistance to homeless families. The funds are provided under an agreement with the City of Lincoln Urban Development Department. LHA provides one-time security deposit assistance to voucher holders who have homeless case management services.

Resident Advisory Board

LHA maintains a Resident Advisory Board made up of volunteers from our assisted housing programs. The board reviews the annual Moving to Work Plan as well as discusses policy changes.

Carol Yoakum Family Resource Center - 4621 NW 48th Street

In 1995, LHA opened the Carol Yoakum Family Resource Center. Located in northwest Lincoln, the center features a childcare center operated by Cedars Youth Services for 48 children under age 6. Other services include a police substation, nutrition education, neighborhood meetings, a computer center, summer youth programs, food distribution, senior services, parenting education, and public workshops. The center is staffed by an LHA service coordinator and receptionist.

Arnold School Community Learning Center

In 2005, LHA became the lead agency in operating Arnold Elementary School Community Learning Center program. The initiative focuses on improved student learning and youth development, strengthening and supporting families, and strengthening and engaging neighborhoods. The family resource center service coordinator leads the program and works with school & community agencies to offer before and after school programs for all students. Key objectives include increasing academic achievement, providing positive and enriching activities outside of school hours, providing resources to families to improve literacy skills, parent skills and family wellbeing.

Lincoln Army Airfield Regimental Chapel

Lincoln Housing Authority owns this historic building located at 4601 Northwest 48th Street. Built for use as a non-denominational military chapel during World War II, it is now used by local church congregations, community organizations, groups, or individuals if the proposed use is educational, religious, charitable, neighborhood-oriented, or family-oriented. Reasonable fees are charged to defray the costs of utilities, maintenance, etc.

Newsletters and Information

- LHA Today - published quarterly and distributed to all LHA households to provide news and information on programs and services of LHA and other agencies.
- Lighthouse - published three times per year to provide information to landlords about LHA and issues related to the voucher program.
- Carol Yoakum Family Resource Center Newsletter - distributed bi-monthly newsletter from the Carol Yoakum Family Resource Center to over 1,800 homes in northwest Lincoln.

Current and past issues of these newsletters can be found online at the LHA website: www.L-housing.com

Property Specific Newsletters

- Monthly newsletters are distributed at Burke Plaza, Crossroads House and Mahoney Manor.
- Quarterly newsletters are distributed at Summer Hill, Wood Bridge, Sunny Ridge and Prairie Crossing.

Rental Listings

LHA provides a listing of rental units where vouchers may be used. The list is available at 5700 R Street and is also available online at www.housing.ne.gov.

Support Services at Burke Plaza, Crossroads House, and Mahoney Manor

- Resident Services Programs: LHA provides full time resident services staff at Burke Plaza and Mahoney Manor and part-time resident services staff at Crossroads House. These Resident Services Specialists are responsible for an ongoing program of resident activities and support. Regular social, recreational, and educational programs are offered at all buildings and a van is provided for group transportation for shopping and recreation. Resident Services Specialists ensure a plan for urgent and emergency response services for residents and maintain ongoing contact with residents so concerns or needs are addressed quickly.

- Congregate Housing Services Program (CHSP): CHSP is a grant program of Housing and Urban Development (HUD) to provide assistance in the form of supportive services to residents of Mahoney Manor and Burke Plaza who are frail elderly, persons with disabilities, and temporarily disabled persons. The purpose of the program is to allow seniors to continue to live independently or with support for as long as possible. The CHSP program is a partnership between the City of Lincoln, through Aging Partners, and the Lincoln Housing Authority. Aging Partners is the grantee of the federal funds for the program. The program began in November 1994. A similar program with separate funding was started at Crossroads House in 1999. Among the three LHA buildings, two full-time counselors from Aging Partners regularly contact every resident, do screening and assessment, develop care plans for individuals who qualify for services, and arrange for the services needed. The CHSP program can provide transportation, personal care services, and housekeeping services. At Burke Plaza and Mahoney Manor, two meals per day are provided for 6 days per week. At Crossroads House, residents are able to participate in a meal program located across the street at Aging Partners. Lincoln Housing Authority provides the local match required for operation of the program.

3. Contributing Factors of Publicly Supported Housing Location and Occupancy

Contributing Factors of Publicly Supported Housing Location and Occupancy

- Community opposition
- Source of income discrimination (Landlord participation in the voucher program)

Other Federal funding and policies

Funding is probably the largest contributing factor impacting the location and occupancy of Public Supported Housing. No funding is available to create more Publicly Supported Housing within this jurisdiction. Since Public Housing, Section 8 Project-based Housing and Multi-family Housing are all site-based assisted housing programs, there is little to no opportunity to change their pre-established locations, even as city and/or the county dynamics change. Tenant selection for these properties is based on HUD-approved designations and tenant suitability. A large percentage of the site-based, assisted housing is designated as elderly/disabled housing. The Publicly Supported Housing properties and programs are probably more closely monitored for Fair Housing compliance than private, unassisted properties. It should also be noted that HUD policies largely dictated the location of these subsidized housing units, often in concentrated areas.

The one Publicly Supported program that offers low-income individuals and families an opportunity to live anywhere within the city of Lincoln is the Section 8 Housing Choice Voucher (HCV) program. However, the HCV program is only available in the city of Lincoln. Because the HCV program determines maximum housing subsidy through HUD's established Fair Market Rents, the program participants are often geographically limited to areas of Lincoln with affordable housing. HUD establishes Fair Market Rents by using the bottom forty-percent of the community's rental market. The rental units within the Fair Market Rent (FMR) range tend to be located in the older, core parts of the city.

Tax Credit properties located outside of the city's core are considered affordable housing, yet their rent rates typically exceed HUD's FMR range. The result is a reinforcement of the tendency to concentrate affordable housing options in the city's older,

core areas. Lincoln Housing Authority can increase payment standards for the HCV program up to 110% of the Fair Market Rent. However, making this policy decision would restrict the number of extremely or very low-income individuals and families that can be served because the funding available for the LHA HCV program is limited. As it is, there is never enough funding available to fully support the number of vouchers at 100% Fair Market Rents. There is already a waiting list with over 4,000 households. Each year the voucher program continues to be insufficiently funded. The situation is made worse when local FMRs do not keep pace with the inflation of local rental rates, effectively freezing the number households that can be served.

Another growing trend with the HCV program is that out-of-state voucher applicants "voucher shop" Housing Authorities across the United States looking for programs with "open" waiting lists. They do this because their community has closed their waiting list or has an extremely long wait time to receive voucher assistance. The out-of-state applicants apply for the HCV program in communities with open waiting listings intending to take their voucher assistance back to the state where they reside. The HCV program policy allows for this out-of-state transfer, which is called "portability".

The portability policy is costly to Lincoln's HCV program. When an out-of-state voucher household moves to a high-cost rental area (metropolitan areas in California, for example), Lincoln Housing Authority still pays the housing assistance in the other community. It can cost LHA's HCV program 3 to 4 times more to assist out-of-state participants than local Lincoln participants. As a result, fewer households are served by LHA's voucher program in order to pay for the housing assistance for a household ported to another state. In spite of that drawback, LHA chooses to keep their HCV waiting list open so they can serve the most destitute households -- the homeless, displaced due to domestic violence, and those displaced due to natural disaster -- as quickly as possible.

F. Disability and Access Analysis

1. Analysis

a. *Population Profile*

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?

John Turner, Director of Housing and Supportive Living for Region V Systems, contributed his perspective to this section. He helped review of disabilities data in *HUD Table 13*. The types of disabilities reviewed are hearing, vision, cognitive, ambulatory, self-care and independent living. John also provided input on mental and behavioral barriers when applicable.

HUD Map 14 'Disability by Type' does not show any concentration of persons with disabilities. Additionally, *AI Map 14 'Estimated Disabilities Concentration'*, which displays areas where more than 10% of the population has a disability, also shows no clustering of persons with disabilities. Conversely, it does show the disabled population as being largely scattered throughout the city. The evaluation of disability type within *HUD Table 1 'Demographics'*, which is the same data as *HUD Table 13*, informs us on average 3% of Lincoln and study the area has form of disability. An average of 87% of those with a disability live within the Lincoln jurisdiction. On average, the percentage of disability by type for both reviewed areas is as follows; hearing difficulty 3.25%, vision difficulty 1.73%, cognitive difficulty 3.56%, ambulatory difficulty 4.9%, self-care difficulty 1.82% and independent living difficulty at 3.38%. The HUD data table does not indicate if these are unique counts. This means one person could identify themselves as having several disability types. We recognize this dynamic in our analysis.

According to the U.S. Census Bureau's 2011-2015 American Community Survey 5-Year Estimates, Table S1810, an equal number of men and women are disabled. Of the total the white (10.6%), black (9.8%) and American Indian and Alaska Native races (15.9%) had the highest percentage of disability by race. 6.4% of Hispanics and Latinos were disabled. Age cohorts with the highest level of disability were 65-74 and 75 plus year with 24% and 50% respectively. Lastly, the population 65 years and over was the most affected through a disability across all categories.

AI Maps 13 'Estimated percent of people with one or more disabilities between 2011-2015' and *AI Map 16 'Percent of People 65 and Older with a Disability between 2011-2015'* address the percentage of a population who may be disabled. In *AI Map 13*, almost 7% of the population in Census Tract 32.02 (the Arnold Heights/Airpark neighborhood) has a hearing or cognitive disability, which is approximately, double the city average of 3.4% shown in *HUD Table 14 'Disability by Age Group'*. There is no attribution by race or ethnicity for disability, but age categories can be examined. In Census Tract 13.01, the level of 18-64 year olds with a disability (14.1%) is higher than the city average (5.2%). Census Tracts 31.03 and 13.01 (the Belmont neighborhood and the 70th & O area) also have higher levels of overall disability.

HUD Table 15 'Disability by Publicly Supported Housing Program Category' indicates a positive connection between areas with higher proportions of persons with disabilities and areas with higher levels of Publicly Supported Housing, Project-based Section 8 Vouchers and Housing Choice Voucher recipients. As one rate increases, so does the other. Persons with a disability access publicly supported housing at a greater rate than the general population. Those with vouchers generally are only able to rent in affordable areas. HUD provided data indicates that at least 20% of persons utilizing these programs has a disability. Local public housing authority data indicates this figure near 40%.

Like persons with other disabilities, persons with mental and behavioral difficulties are dispersed but are likely in higher concentrations in affordable areas where single room rents are near $500/month. Overall, the distribution of persons with a disability seems fair. *AI Map 14* supports this statement.

Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges.

A common theme throughout this analysis is that the place a person resides is primarily due to household income, not a disability or diagnosis. *HUD Map 15 'Disability by Age Group'* details the location of disability by age. *HUD Table 14 'Disability by Age Group'* provides a broad overview of both Lincoln and the study area. Lastly, *HUD Table 15 'Disability by Publicly Supported Housing Program Category'* reviews the disability status of those receipts within several publicly supported housing programs. *HUD Table 14* shows that 0.74% of people 5-17 have a disability within both Lincoln and the study area. *HUD Map 15* shows a scattering of this age cohort largely within the core and north of O Street. Within the 18-64 age group, an average of 5.29% of the general population has a disability across both Lincoln and the study area. *HUD Map 15* shows a scattering of this age group across the city with a slightly higher concentration within the pre-1950 boundaries of Lincoln. This distribution is reasonable as

this age group constitutes the largest percentage of the population and is located in a mix of moderate to higher income areas. Lastly, within the 65+ age group an average of 4.1% of the general population has a disability across both Lincoln and the study area. *HUD Map 15* shows a scattering of this age group with a slightly higher concentration at the city's edges. This distribution is reasonable as eldercare and higher income households, among others, account for this distribution.
Our visual analysis does not show any broad clustering of disability by type. There were, not surprisingly, common clusters among all disability types coinciding with large care centers and retirement communities. Persons with mental and/or behavior difficulties are also fairly evenly dispersed, but are also somewhat concentrated in affordable areas where neighborhood level services are more readily available.

b. Housing Accessibility

Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.

The area of this analysis does not have sufficient affordable, accessible/available housing in a range of unit sizes for persons/households with a disability. In our AI Community Survey, those who self-identified as having a disability selected: finding a unit in a safe neighborhood, finding an affordable/accessible unit, finding a unit large enough to accommodate my family, and finding a unit near services and amenities as the greatest challenges in obtaining housing to question #22 'In your experience, which of the following issues have presented challenges to you when looking for housing?' Additionally, in question #23 'Does your current housing meet your accessibility needs,' only 18% of disabled survey respondents said their housing was insufficient.

Those who stated their housing was insufficient then selected cost of construction, lack of knowledge of resources, and fear that requesting accommodations could jeopardize housing stability in question #26 'What barriers did you experience when attempting to modify your housing to accommodate your disability?'.

Depending on your disability type, according to John Turner, Region V Services, "It's really hard to find housing that is up to community standards. Challenges such as a poor credit, eviction histories, and criminal charges only compound a tight housing market." John further states that even without those complications, the underlying ambulatory barriers that many faces (i.e. wheelchair ramp, appropriate steps, elevator access, and wide doorways, etc.) aren't addressed in existing affordable housing opportunities. These challenges can be difficult to overcome, especially if landlord knowledge of fair housing law does not fully support equal access.

In Questions 78 & 79 of our Community Survey, respondents were asked about the availability of units in a variety of sizes. Question 78 was 'Are you able to find affordable rental housing in each category?' Households with a disability that answered "no" had greater challenges finding affordable rental housing compared to the survey population as a whole; studio (19.% Disability household , 16% - Nondisability household), one bedroom (27%, 18%), two bedroom (36%, 26%), three bedroom (42%, 36%) four bedroom (46%, 36%), and five plus bedroom (46%, 35%). However, an average of 48% of respondents did not know about the affordability of rentals. This study recognizes the additional barriers those with a disability face in accessing housing of a variety of unit sizes. We also recognize that, as household income declines, so do the available choices of housing size.

Community Survey, Question 79 was 'Are you able to find affordable housing for sale in each category?' Households with a disability that marked "no" had greater challenges finding affordable housing for sale compared to the survey population as a whole; Studio (32.% - Disability Household , 16% - Nondisability household), one bedroom (33%, 17%), two bedroom (36%, 23%), three bedroom (45%, 29%) four bedroom (51%, 33%), and five plus bedroom (49%, 33%). However, an average of 42% of respondents did not know about the affordability of homes for sale. This study recognizes the additional barriers those with a disability face in accessing rental housing of variety of unit sizes. We also recognize that, as household income declines, so do the available choices of housing size.

Community Survey, Question 74 supports these conclusions. It asks the true/false question, 'I believe there are not many barriers to fair housing choice in Lancaster County.' If respondents had a household member with a disability, 65% disagreed with that statement. If they did not have a disabled household member, 52% disagreed.

The citywide lack of sufficient affordable, accessible/available housing in a range of unit sizes for persons/households with a disability was confirmed by data, survey and particularly our focus groups. For example, our disability focus group was asked to rate the level of housing fairness citywide for those with a disability. Other focus groups rated this broad question somewhat positively with an 8 of 10; the disability focus group focus group rated the question with 3 or 4 of 10; a much less positive response.

Throughout this category of our assessment, the Census Tract 7 R/ECAP area was not directly noted as having greater needs compared to the city as a whole.

Describe the areas where affordable accessible housing units are located. Do they align with R/ECAPs or other areas that are segregated?

Physically accessible housing is generally located in publicly supported housing, low-income housing tax credit units, and assisted living facilities. These types of housing are located throughout the community with limited units found in Census Tract R/ECAP area. Within Lincoln, assisted living or nursing homes can be located in any district zoned for residential or office use through a special use permit.

The City follows the 1988 Fair Housing Amendment Act, which was fully enacted in 1991. The City reviews multi-unit properties with four units or more to determine if they meet fair housing and accessible design standards. Data on the affordability of these properties is not available. Geographically, the majority of Lincoln's multi-unit properties built after 1991 are located on the edges of the community, and in locations where infill has occurred since 1991. In Lincoln, if a multiunit property is substantially renovated, it must be brought up to current housing and safety codes. In contrast, townhomes and single-family homes are not required to meet any level of accessibility.

Of the AI community survey respondents who stated they experienced a 'Lack of units that accommodate specific needs,' in Q #41 'In your experience, do you feel any of the following factors were barriers to your ability to accessing housing of your choice?' this study found no area of concentration of those who also provided their street intersection.

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

The type, size and structure of buildings in Project-based Housing and Public Housing can limit where disabled individuals can live. The Housing Choice Voucher program, which serves the largest low-income disabled population, offers more possibilities of choice and flexibility in meeting the needs of persons with a disability. Overall, Lincoln Housing Authority serves a higher percentage of the disabled population than the general population. They recognize a variety of needs for supportive services for mental health and behavior clients to enable them to obtain and retain housing. Aging Partners, the aging agency serving eight southeast Nebraska counties, also sees the need for specialized supportive housing that understands a variety of needs.

Both LHA and Aging Partners have seen how regulatory or program issues impact the continuum of stable housing. For example, a client utilizes Region V Systems assisted-housing and receives supportive services. Once the client exceeds the length he/she can be in the program, they are eligible for a waiting list preference from the LHA HCV program to help them transition into permanent housing. However, the supportive services are lost in that transition. In some cases, those services are what made it possible for that person to retain housing. All agree that development of financial resources for supportive services would improve housing outcomes for persons with disabilities.

c. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

There is not a link between segregated areas and disability types (i.e. hearing, vision, ambulatory, self-care, and independent living). However, according to John Turn of Region V Services, which serves behavioral, mental health and other disabled clients, housing for the disabled population is located together; primarily due to the affordability of the rent and location of supportive partner options. Persons in rehabilitative institutions are located in facilities that provide wrap around services.

The State of Nebraska's invests $500,000 annually in 16 counties in Southeast Nebraska including Lancaster and Seward counties. This initiative funds the reintegration of consumers with a serious mental illness who are discharged from inpatient mental health board commitment into the community. As Turner observed, the standard for reintegration of those with a behavior disability is integration, not segregation into behaviorally disabled enclaves. He recommended, per federal HUD language Integration means that no more than 25% of a housing complex's residents be persons of a similar diagnosis. While Region V tries to conform to this standard per housing structure, the lack of affordable & available rental options makes it difficult. Sometimes the 25% standard has to be applied to the overall block context because of the lack of housing

options. Ultimately, the ideal is that all persons with any aspect of disability can be successfully integrated into their respective neighborhoods.

The City has taken steps to improve access for residents with a disability and supports efforts to expand where these individuals may be able to reside. To further this, the City adheres to the Americans with Disabilities Act (ADA), which states that the City will not discriminate on the basis of disability in the admission or access to employment, programs and activities. All contents on the City's website can also be made accessible to those with disabilities if it does not impose undue burden on the City. A City ADA compliance officer can be contacted for all concerns and violations concerning the provision of the ADA and rights of those with a disability.

Describe the range of options for persons with disabilities to access affordable housing and supportive services.

The choice of housing is further limited for those disabled persons with bad credit, landlord history, collections or felonies. Services that are able to assist with these types of deficiencies are very limited and require coordination among existing service agencies and the local Continuum of Care. Access to supportive services falls into two broad categories:

- For elderly/disabled clients, the main service obstacle is typically lack of money, so those supportive services need to be financial.
- For behaviorally/mentally disabled persons and persons leaving the correctional system, the main obstacle to service is often behavior, so social/ counseling/support services are needed. This type of housing is limited by the concentration of clients within existing buildings and the reluctance of new units to be accommodating to those needs.

Lincoln has several examples of developments with wrap-around supportive services and several homes designed to assist individuals recompose without having to enter traditional supportive services. There are also many warm support lines for persons with mental disabilities, addictions, behavioral supports and for the general aging disabled population.

d. Disparities in Access to Opportunity

To what extent are persons with disabilities able to access the following?
Identify major barriers faced concerning:

Government services and facilities

The City of Lincoln has an ADA policy and has issued a notice that the City will not discriminate against qualified individuals with disabilities on the basis of any disability in the City's services, programs or activities. The City will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all City programs, services, and activities. For example, individuals with service animals are welcomed in City offices, even where pets are generally prohibited. However, there may be times where an individual may require auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a City program, service, or activity.

Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

In accordance with the City's Code of Ordinances (available in the City's website) design, construction and maintenance of public sidewalks, pedestrian crossings and signals is in compliance with the American With Disabilities Act.

Transportation

Transportation for persons with a disability can become an issue if there is not adequate accessibility. The cost of privately owned transportation can be quite high because vehicles may be required to be outfitted to accommodate the person's disabilities. This an option many disabled persons with limited incomes cannot afford.

StarTran, the city public bus system, offers several paratransit programs, which provide individuals with disabilities with opportunities of independence and flexibility. Regular fixed-route and shuttle services for seniors and persons with disabilities are available for a reduced fare. Service animals are allowed on all vehicles.

Proficient schools and educational programs

Students can get permission to transfer into any school in our district that is not already full. A high percentage of families choose to have their children attend their neighborhood school. Students who are homeless or have move due to foster care placement are allowed to remain in their current school unless a school change is in the best interests of the student. The

Lincoln Housing Authority Resident Advisory Board expressed strong support for LPS school choice policies, especially at the high school level.

Jobs

The City of Lincoln and LHA are both Equal Opportunity Employers. They enforce equal opportunity and support the accommodation provisions of the ADA, which protects persons with a disability who may be seeking a job. The City also understands that reasonable accommodations may be necessary to enable qualified individuals with disabilities to perform their jobs. If any person with a disability is selected for an interview and needs an accommodation to participate, they are welcome to contact the Human Resources Office.

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.

- The City Ombudsman is the ADA Coordinator and coordinates all external complaints of against the City of Lincoln.
- The Commission on Human Rights coordinates all internal complaints of discrimination within Lancaster County.

The City of Lincoln is in full compliance with the Americans With Disabilities Act (ADA). The City does not discriminate on the basis of disability in the admission or access to, or treatment or employment in, its programs or activities. An exceptional level of service can only be achieved by an exceptional group of people. Therefore, the City of Lincoln places great importance on both hiring and maintaining a diverse group of employees to service our citizens. Everyone is different, everyone is necessary and everyone has a valuable perspective to offer.

Each of us possesses a unique and valuable mix of personal characteristics and experiences that contribute to the fabric of who we are. These include, but are not limited to age, race, gender, religion, ancestry, veteran status, pregnancy, sexual orientation, national origin, disability or handicap, physical characteristics or marital status.

The City of Lincoln recognizes and respects the intrinsic benefit provided by incorporating these differences into our workforce. We are committed to employing a diverse and talented team of individuals who reflect our community and whose differences enhance the services we provide to our citizens.

The City recognizes the importance of making the website accessible to everybody, regardless of their level of ability or disability, and is also committed to providing access for persons with a disability. Under reasonable accommodations, all information on the website can be made available in an alternative format and/or arrangements can be made by the City's ADA Coordinator to meet the needs of the individual.

Lastly, the City of Lincoln complies with Title VI of the Civil Rights Act of 1964 and Section 504 of the Rehabilitation Act of 1973 guidelines. Ensuring the public's access to and participation in public meetings is a priority for the City of Lincoln. If a person is in need of a reasonable accommodation in order to attend or participate in a public meeting conducted by the City of Lincoln, they are invited to contact the Director of Equity and Diversity, Lincoln Commission on Human Rights, at (402) 441-7624, as soon as possible before the scheduled meeting date to allow time for the response to their request.

Partners Utilized

The Assistive Technology Partnership (ATP), through collaboration, provides all Nebraskans access and opportunities to better live, learn, and work. Since 1989, ATP has assisted Nebraskans with disabilities, their families, educators, service coordinators, employers and a host of agencies to learn about and use assistive technology. ATP, located in Lincoln, is a state agency in the Department of Education. ATP provides a variety of services including equipment, funding, home modifications, and assistance at work and school.

Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities.

Several of the focus groups indicated that persons with disabilities experience an increased difficulty in achieving homeownership compared to persons without a disability. Many individuals with disabilities are on a fixed-income, which can prohibit homeownership because of income eligibility requirements, or if they already own their home, they may not be able to afford to adequately maintain/modify their property. For some disabled individuals, the obstacles go beyond meeting the basic requirements of income eligibility and credit-worthiness to achieve homeownership; they must also find suitable housing to meet their physical requirements. A homebuilder commented that handicap accessible housing is rarely a builders priority because of the higher costs associated with building these types of units. The costs associated with retrofitting existing housing tend to prohibit the contractors from doing this on a speculative basis. As the costs rise, the market narrows, making building or renovating mobility accessible housing less desirable to contractors. In addition, the majority of Lincoln's housing stock consists of multi-level homes, which present major obstacles for individuals with physical limitations. Accessible, affordable single-family dwelling homes within the city are in short supply. A focus group also indicated that the need for a person with a disability to be within close proximity to certain services can also limit their homeownership choices; this is a particularly common barrier for persons with a mental disability.

e. Disproportionate Housing Needs

Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities.

AI Community Survey 3-Disability question 26 asked those who identified as being disabled or having a member in the household with a disability, 'If modifications were needed, what barriers did you experience when attempting to modify your housing to accommodate your disability?' the following was reported as barriers to home modification: cost of construction (42.8%), not a priority (35.7%), lack of space or ability to construct necessary accommodations (26.1%), fear that requesting accommodations could jeopardize housing stability (26.1%), Lack of knowledge of resources (19%) and landlord denied request (19%).

AI Community Survey 3-Disability question 41 asked, 'In your experience, do you feel any of the following factors were barriers to your ability to accessing housing of your choice' 12% of the self-identified disability households respondents selected 'Lack of units that accommodate specific needs' compared to 6% for the general public. This study found no area of concentration of those who also provided their street intersection. The remainder of the AI Community Survey 3-Disability shows how each group (disability and non-disability groups) found the importance of factors that contributed to a perceived housing barrier. The top three responses for each group was 'the need for affordable housing options', 'needing better credit' and 'I have not experienced any barriers'. Lastly, there were low barriers to housing choice due to transportation, employment opportunities, and access to childcare across both groups.

2. Additional Information

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

N/A

The program participant may also describe other information relevant to its assessment of disability and access issues.

N/A

a. 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.

- Access to transportation for persons with disabilities
- Lack of affordable, accessible housing in range of unit sizes
- Lack of affordable, integrated housing for individuals who need supportive services

3. Other Contributing Factors

a. Sidewalk Maintenance

As with many communities, sidewalk maintenance can be an issue. The Lincoln sidewalk repair program is intended to make sidewalks accessible and safe for all users. The repair program objective is to repair sidewalk separations that are greater than one half inch and comply with the maximum ADA slope criteria. Several years ago, the City initiated repair contracts to focus on repairs and construct curb ramps to meet ADA requirements. The City also offers a sidewalk reimbursement program to property owners who wish to repair their sidewalk, but funds are limited.

G. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

1. Analysis

List and summarize any of the following that have not been resolved: a charge or letter of a 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.

N/A

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

Title 11 Lincoln Municipal Code, Chapter 11, prohibits housing discrimination based on race, religion, color, national origin, familial status, sex and disability. Protected characteristics include sales, rental, housing accommodation, dog guide, discriminatory denial of loan, multiple listing service, real estate service, and residential real estate transactions.

The Nebraska Equal Opportunity Commission is authorized to enforce the Nebraska Fair Housing Act. Discrimination is prohibited based on race, religion, color, national origin, familial status, sex and disability. Protected characteristics include sales, rental, transactions related to residential real estate, multiple listing service, religious organization, private home, private club, or housing for older persons; restricting use not prohibited; local restrictions; how treated; controlled substances; and illegal activities.

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.

The Lincoln Commission on Human Rights

The commission was created in 1966 and they play a neutral role, investigating complaints of discrimination, to settle complaints if possible; to determine, after investigation, whether there was discrimination in violation of Title 11 City of Lincoln Equal Opportunity Ordinance; state and federal laws, and to order remedies if a hearing of the complainant proves that discrimination has occurred. Resources include City of Lincoln General Fund, the Department of Housing and Urban Development and the Equal Employment Opportunity Commission.

The Nebraska Equal Opportunity Commission

They are a neutral administrative agency created by statute in 1965 to enforce the public policy of the state against discrimination and to enforce state and federal law. The principal function of the NEOC is to receive, investigate and pass upon charges of unlawful discrimination occurring anywhere within the State of Nebraska in the areas of Employment, Housing, and Public Accommodations.

The Fair Housing Center of Nebraska & Iowa/Family Housing Advisory Services

They help fight housing discrimination across Nebraska and in Western Iowa. They provide investigative services, testing, advice, advocacy, conciliation, attorney referral and community education. Resources include City of Omaha - CDBG (Housing Counseling), City of Council Bluffs - CDBG (Housing Counseling), Department of Housing and Urban Development - Housing Counseling, Department of Housing Urban Development - Private Enforcement Initiatives, Volunteer Income Tax Assistance, and State of Nebraska - Housing Assistance Payments.

NeighborWorks Lincoln (NWL)

They fully support Fair Housing and invite speakers from the Lincoln Commission on Human Rights to the homebuyer education classes. The front page of the NeighborWorks website states that NWL supports and promotes fair housing. Also, through the homebuyer education classes, fair housing law is discussed along with information on where to go if a homebuyer feels that discrimination has taken place. Resources include, City of Lincoln and Trust Funds from the Department of Economic Development.

Nebraska Rentwise Lincoln Network

They are a group of local organizations and volunteers certified by Nebraska Rentwise who collectively work together to provide renters education within the city of Lincoln. The Nebraska RentWise education program promotes Fair Housing and educates the participants on the Fair Housing laws and how to file discrimination complaints. These Nebraska RentWise classes are offered to the community at least twice a month. The Lincoln Network's goal is to help potential renters obtain and maintain affordable housing.

Community Action Partnership

They support fair housing through the Tenant Support Services program. This program focuses on eviction prevention, landlord and tenant mediation, and information regarding tenant rights and obligations in the state of Nebraska, including fair housing law. This program is supported by Lancaster County Joint Budget Committee and the Nebraska Department of Health and Human Services Community Services Block Grant funds.

2. Additional Information

Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.

In September 2016, The Lincoln Commission on Human Rights (LCHR) was awarded a Department of Housing and Urban Development (HUD) grant in the amount of $22,500 to support outreach efforts to women and underserved minorities in Lincoln. This is in addition to the efforts described in the next question below. In preparing the grant, the LCHR identified women as a target population who may not know or fully understand their civil fair housing rights. This includes not knowing where to file a complaint or reluctance to do so based on fear of retaliation. The mission is to educate and connect with women and underserved populations from different backgrounds through Lincoln's cultural centers and cultural events. With the assistance of a marketing contractor, the LCHR has developed posters, brochures, television commercials, and billboards in an attempt to reach not only women, but others who are in need of fair housing education.

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

The Lincoln Commission on Human Rights (LCHR) has outreach activities throughout the year to ensure that the refugee, immigrant and community at large have the opportunity to learn about fair housing. The outreach done through the University of Nebraska is handled through the Husker's Pantry, Women's office and Greek Affairs office, the Jackie Gaughan Multicultural Center and the LGBTQ Center. The LCHR also works with the Good Neighbor Community Center's Mena Project that assists women from the Middle East. The commission investigates discrimination complaints based on housing, employment, and public accommodation. Furthermore, they host a yearly civil rights conference that responds to the needs of the community by organizing speakers and topic material, which often includes fair housing updates.

Additional relationships have been established with:

- CenterPoint (addiction and mental health treatment center)
- Friendship Home (shelter and advocate for victims of domestic abuse)
- Fresh Start (transitional women's shelter)
- St Monica's (substance abuse and mental health treatment organization)
- Center for People in Need (housing, education and hunger prevention)
- Catholic Social Services (refugee resettlement, food pantry and emergency services)
- Yazidi Community Center (serves Lincoln's Yazidi community)
- NeighborWorks Lincoln (community revitalization)
- Matt Talbot (homeless prevention and hunger relief)
- F Street Recreation Center (low/moderate income community center)
- El Centro de Las Americas (community center)
- Malone Center (cultural center)
- Ponce Tribe (cultural center)
- Indian Center (cultural center)

- Asian Center (cultural center)

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 enforcement, outreach capacity, and resources and the fair housing issues, which are Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

- Lack of resources for fair housing agencies and organizations

3. Other

N/A

H. Outcome Analysis:

1. Prioritization of Contributing Factors

For each fair housing issue, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the impediment set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.

Note that contributing factors may be outside the ability of program participants to directly control or influence. In such cases, those factors must be included in the prioritization. There still may be policy options or goals that program participants should identify, while recognizing the limitations involved.

Ranking with the greatest priority start with '1'

Contributing Factors of Segregation

- ❑ Location and type of affordable housing – 1
- ❑ Private discrimination – 2
- ❑ Community Opposition – 3

A majority of focus group respondents and other data sources agree that, in Lincoln, the cost of housing (as a proportion of household income) is the primary factor determining where one lives; rather than a person's protected, disability or diagnosed characteristics. We assigned affordable housing as our highest priority. Improving the location and type of affordable housing will improve our already low dissimilarity index values.

Private discrimination is illegal, but it still happens throughout the City of Lincoln and within the study area. When looking to rent or buy a home in the last five years, 6.8% of community survey respondents reported that they were discriminated against. Respondents shared examples of perceived discrimination that ranged from discrimination based on protected characteristics (i.e. gender status, disabilities, age etc.) to discrimination based on unprotected characteristics (i.e. bad credit). Through focus groups, we also heard discrimination varied in severity and degree of intentionality. We believe private discrimination is a factor that needs continued attention and we rank it second.

Community opposition limits neighborhood reinvestment and locations available for public housing. Often, the opposition is based on misconceptions with little or no basis. Changing preconceived ideas and misconceptions can be a slow, subtle, hard to measure process, but even small beginning steps can make a difference. We have ranked community opposition as third within our contributing factors of segregation.

Contributing factors of RECAP

- ❑ Location and type of affordable housing - 1

A majority of focus group respondents and other data sources agree that, in Lincoln, the cost of housing (as a proportion of household income) is the primary factor determining where one lives; rather than a person's protected, disability or diagnosed characteristics. We assigned affordable housing as our highest priority. Improving the location and type of affordable housing will improve our already low dissimilarity index values.

Contributing factors of disparities in Access to Opportunity

- ❑ Location and type of affordable housing – 1
- ❑ Availability, type, frequency, and reliability of public transportation - 2
- ❑ Private Discrimination - 3

A majority of focus group respondents and other data sources agree that, in Lincoln, the cost of housing (as a proportion of household income) is the primary factor determining where one lives; rather than a person's protected, disability or diagnosed characteristics. In our community survey, we asked respondents to think about the types of jobs for which they were qualified, for based on factors such as work experience, job skills, and level of education. Of the responses, 38.8% said those jobs typically located in areas where housing was unaffordable, both to rent and purchase. Improving the location and type of affordable housing will positively impact education, employment, transportation, poverty exposure, environmentally healthy neighborhood opportunities.

In early 2015, StarTran launched the Transit Development Plan (TDP), an effort to determine the best approach for improving and expanding transit service in Lincoln. This study included a comprehensive evaluation of the entire

transit system. An extensive outreach effort was made to engage the community and determine the needs and preferences of customers. As a result of the TDP, evening service will be expanded on key routes, service frequency will be increased, and direct service routes will be added. More information on the TDP improvements can be found at lincoln.ne.gov Keyword: TDP or by contacting the city directly.

In our community survey, 7.7% of respondents were not using the transportation of their choice and noted a need for better public transportation. We recognize that an improved transit and trail system will increase access to opportunities (i.e. job training, employment, etc.) and have ranked this factor second in importance.

Private discrimination is illegal, but it still happens throughout the City of Lincoln and within the study area. When looking to rent or buy a home in the last five years, 6.8% of community survey respondents reported that they were discriminated against. Respondents shared examples of perceived discrimination that ranged from discrimination based on protected characteristics (i.e. gender status, disabilities, age etc.) to discrimination based on unprotected characteristics (i.e. bad credit). Through focus groups, we also heard of discrimination that varied in severity and degree of intentionality. We believe private discrimination is a factor that needs continued attention and we rank it third.

Contributing Factors of Disproportionate Housing Needs

- ❑ Lack of private investments in specific neighborhoods (Grocery, Private housing) – 1
- ❑ The availability of affordable units in a range of sizes – 2
- ❑ Lack of Public Investments in specific neighborhoods, including services or amenities – 3
- ❑ Land use and zoning laws (Mobile Home Vitality, Code Enforcement) - 4

Focus group participants provided a variety of comments on needed private investment. However, a common statement centered on the need for increased grocery access. Recent trends have led to the movement of services such as grocery stores and medical clinics away from neighborhoods and toward main arterials, which limits accessibility for some people. We rank lack of specific private investments in specific neighborhoods (Grocery, Private housing) as our top issue.

When we asked focus groups and other local professionals what type of housing was needed, the most common response was an affordable three-bedroom plus unit. While a majority of community survey respondents answered 'I don't know' to question #79 'are you able to find affordable housing,' many renters and potential homeowners did rate the availability of homes difficult to find. Hence, we rate this need next as it harmonizes with the contributing factor of 'location and type of affordable housing' found in other sections. Our assessment ranks this second.

The need for investment in public transportation access was a concern we heard again and again. As part of the AI Community Survey, respondents were asked if they experience impediments/ discrimination when they access community assets, services and facilities. About 84% of homeowners and 76% of renters identified low levels of impediments; they selected 1, 2, or 3 on a 1 to 5 scale. Homeowners and renters have different levels of access to community assets. Because of this, and because the Transit Development Plan has not yet been fully implemented, we rate 'Lack of Public Investments in specific neighborhoods, including services or amenities' as our third issue.

We also rate 'Land use and zoning laws (Mobile Home Vitality, Code Enforcement)' fourth. We recognize there is a need for creative redevelopment of mobile home parks. They are affordable but susceptible to substandard factors. Lastly, comments about code enforcement encouraging repairs only to a base standard were recognized.

Contributing Factors of Publicly Supported Housing

- ❑ Federal Funding and Policies - 1
- ❑ Source of income discrimination (Landlord participation in the voucher program) - 2
- ❑ Community opposition - 3

Funding is probably the largest contributing factor affecting the location and occupancy of public supported housing. No funding is available to create more publicly supported housing within this jurisdiction. A growing trend with the Housing Certificate Voucher program is that out-of-state voucher applicants "voucher shop" housing authorities across the United States looking for programs with "open" waiting lists. The federal portability policy is costly to Lincoln's HCV program. A detailed review was presented at the end of that assessment section.

We rank 'Source of income discrimination (Landlord participation in the voucher program)' as our second contributing factor. Strong demand in the rental market has allowed landlords to rent units without making needed improvements. These landlords do not see the need to meet LHA's inspections standards. Increasing housing location choice is critical piece of the HCV program and warrants continued effort.

Community misperceptions about people who live in publicly supported housing can cause opposition and limit neighborhood support. Often, opposition is based on misconceptions with little or no basis. Changing preconceived ideas and correcting misconceptions can be a slow, subtle, hard to measure process, but even small beginning steps can make a difference. We have ranked community opposition as third within our contributing factors impacting publicly supported housing.

Contributing Factors of Disability and Access Issues

- ❑ Lack of affordable, accessible housing in range of unit sizes – 1
- ❑ Lack of affordable, integrated housing for individuals who need supportive services - 2
- ❑ Sidewalk maintenance - 3
- ❑ Access to transportation for persons with disabilities - 4

A majority of focus group respondents and other data sources agree that, in Lincoln, the cost of housing (as a proportion of household income) is the primary factor determining where one lives; rather than a person's protected, disability or diagnosed characteristics. The citywide lack of sufficient affordable, accessible/available housing in a range of unit sizes for persons/households with a disability is more pronounced than for those without a disability. On average, across the housing options offered in the AI community survey, we see that is is much more difficult for a disabled person to find housing. For rental units, a disabled household has on average a 10% greater challenge to find a suitable unit. For homes for sale, a disabled household has on average a 19% greater challenge to find a suitable unit. For this reason, we rate the factor 'Lack of affordable, accessible housing in range of unit sizes' as our top priority.

According to John Turn of Region V Services, which serves behavioral, mental health and other disabled clients, housing for the disabled population is located together; primarily due to the affordability of the rent and location of supportive partner options. Persons in rehabilitative institutions are located in facilities that provide wrap around services. The standard for reintegration of those with a behavior disability is integration, not segregation into behaviorally disabled enclaves. Ultimately, the ideal is that all persons with any aspect of disability can be successfully integrated into their respective neighborhoods. The City has taken steps to improve access for residents with a disability and supports efforts to expand where these individuals may be able to reside. We recognize this effort must continue and rate the factor 'Lack of affordable, integrated housing for individuals who need supportive services' as our second priority.

As with many communities, sidewalk maintenance can be an issue. The Lincoln sidewalk repair program is intended to make sidewalks accessible and safe for all users. The repair program objective is to repair sidewalk separations that are greater than one half inch and comply with the maximum ADA slope criteria. Several years ago, the City initiated repair contracts to focus on repairs and construct curb ramps to meet ADA requirements. The City also offers a sidewalk reimbursement program to property owners who wish to repair their sidewalk, but funds are limited. Nevertheless, this assessment recognizes its importance, and rates the factor 'sidewalk maintenance' as our third priority.

In early 2015, StarTran launched the Transit Development Plan (TDP), an effort to determine the best approach for improving and expanding transit service in Lincoln. This study included a comprehensive evaluation of the entire transit system. An extensive outreach effort was made to engage the community and determine the needs and preferences of customers. As a result of the TDP, evening service will be expanded on key routes, service frequency will be increased, and direct service routes will be added. More information on the TDP improvements can be found at lincoln.ne.gov Keyword: TDP or by contacting the city directly. In our community, survey 7.7% stated that they weren't using the transportation of their choice and noted a need for better public transportation. Of those that self-selected a household with a disability, 16% indicated they were not using the transportation of their choice. Responses varied when prompted to describe why, but we recognize the additional challenge a disability may have in accessing transportation and rank the factor 'Access to transportation for persons with disabilities' as our fourth priority.

Contributing Factors of Fair Housing Enforcement, Outreach Capacity and Resource

- ❑ Lack of resources for fair housing agencies and organizations - 1

Our ability to provide fair housing testing, assessment and outreach is largely limited to our budget. Its importance to the community as a whole is why the factor 'Lack of resources for fair housing agencies and organizations' is our first priority.

COMPONENT 2: TAKING ACTIONS TO ELIMINATE IDENTIFIED IMPEDIMENTS

Below are our identified impediments:

IMPEDIMENT #1: Lack of affordable housing options

- **Metrics, Milestones, and Timeframe for Achievement:** The City of Lincoln and Lincoln Housing Authority will work to engage, implement and document actions below within the five-year strategic plan. Each AI impediment will have actions to address their contributing factors and fair housing issues.
- **Contributing Factors:** location and type of affordable housing; community opposition; lack of affordable, accessible housing in range of unit sizes; lack of private investments in specific neighborhoods (private housing); lack of public investments in specific neighborhoods, including services or amenities.
- **Fair Housing Issues:** segregation/integration; R/ECAPs; disparities in access to opportunity; disproportionate housing needs; publicly supported housing analysis; disability and access analysis.
- **Goal & Actions:**

  Increase affordable housing production and reduction in cost-burdened households.

  A. The City will develop six new homeowner units annually or at a limit, that funding supports.
  B. The city will provide homeownership education to 50 households annually or at a limit that funding support.
  C. The City will support 50 first time homebuyers annually or at a limit, that funding supports.
  D. The City will discuss inclusion of rental housing gap financing during the community participation process in the 2018-2023 strategic plan. This discussion will also include how the city can support the affordable housing development in all parts of the city.
  E. The City of Lincoln will examine mandating affordable units in new multifamily unit construction in the next Lincoln Lancaster comprehensive plan update in 2021
  F. The City of Lincoln Urban Development Department will create for consideration a proposal in 2018 that would mandate any project with housing financed by TIF or other public assistance to participate in the housing choice voucher (HCV) program and accept tenants with HCV's.
  G. The City of Lincoln Urban Development Department will create for consideration a proposal in 2018 which would mandate any project with rental unit's created with TIF assistance will include a percentage of units affordable to low income persons.
  H. The City of Lincoln will seek out opportunities to develop new affordable housing with community housing development organizations (CHDOs) and other partners to promote both ownership and rental opportunities of the next five years.
  I. The City of Lincoln will create for consideration a plan in 2018 to use turn back tax funds to fund low income tax credit housing projects or other uses related to affordable housing.
  J. The City of Lincoln will continue to rebate impact fee for low to moderate-income families when they construct new homes over the next five years.
  K. LHA will build at least one new unit a year in partnership with Lincoln Public Schools, which will be sold to a low to moderate income household who participates in a LHA program.
  L. LHA will seek to develop at least one new affordable multifamily rental housing development in the next five years utilizing Low Income Housing Tax Credits and incorporating accessible units.
  M. LHA will seek to allocate 20 project-based vouchers with a partner who provides affordable, integrated housing for individuals who need supportive services within the next five years.
  N. LHA will annually educate congressional representatives on the need for federal housing funds and suggested policy changes.

- **Responsible Program Participant(s):** The City of Lincoln and Lincoln Housing Authority (LHA)
- **Discussion:** The location and availability of affordable housing was noted throughout this assessment as a primary contributing factor of where people live. There was a strong consensus amongst focus groups about the need for additional affordable and accessible housing. The actions above are designed to facilitate policy discussions and

public/private investment, which will lead to the production additional of affordable and accessible housing throughout the study area.

IMPEDIMENT #2: Lack of economical ways to preserve adequate housing stock

- **Metrics, Milestones, and Timeframe for Achievement:** The City of Lincoln and Lincoln Housing Authority will work to engage, implement and document actions below within the five-year strategic plan. Each AI impediment will have actions to address their contributing factors and fair housing issues.
- **Contributing Factors:** location and type of affordable housing; community opposition; lack of affordable, accessible housing in range of unit sizes; lack of private investments in specific neighborhoods (private housing); lack of public investments in specific neighborhoods, including services or amenities; land use and zoning laws (mobile home vitality, code enforcement).
- **Fair Housing Issues:** segregation/integration; R/ECAPs; disparities in access to opportunity; disproportionate housing needs; publicly supported housing analysis; disability and access analysis.
- **Goals & Actions:**

Rehabilitate housing units

A. The City of Lincoln will rehabilitate and/or repair 77 owner occupied housing units annually or at a limit, that funding supports to help maintain a quality housing stock.
B. The City of Lincoln will utilize Community Development Organizations and Community Housing Development Organizations to market the City's three rehabilitation programs over the next five years.

Support code enforcement of the existing housing stock

A. The Urban Development Department will participate in Building and Safety's review and adoption of minimum maintenance codes. They will bring forward fair housing concerns, and promote positions to maintain existing affordable housing.
B. The Urban Development Department will participate in Building and Safety's annual review and adoption of apartment licensing program changes. They will bring forward fair housing concerns, and promote positions to maintain existing affordable housing.

Support healthy neighborhoods

C. The City will provide administrative support to the community health endowment in their work to improve neighborhood health over the next five years.
D. Collaborate with other agencies/departments to keep existing housing occupied and residents stable
E. The City of Lincoln will provide data and administrative support to the Problem Resolution Team over the next five years.
F. The City of Lincoln and LHA will provide data and administrative support to the Greater Lincoln Workforce Development Board in their efforts to enhance both employer and employee opportunities over the next five years.
G. The City of Lincoln will continue to promote the Lincoln Electric System's weatherization program through our housing programs over the next five years.
H. Urban Development Department will partner with other departments/agencies to prioritize for action 150 potential vacant properties and develop a method to engage high priority properties over the next five years
I. Urban Development Department will include in the community participation process for the 2018-2023 strategic plan a conversation about the need for: mobile home parks, cooperative housing opportunities, small homes, and accessory dwelling units.
J. Urban development Department in 2018 will draft for consideration a model policy to require the replacement of affordable housing if units are lost to redevelopment projects using TIF financing.
K. LHA will support and promote Nebraska Rentwise training for at least 500 lower income renters per year as funding allows.
L. LHA will annually inspect and maintain LHA-operated publicly supported housing at a UPCS score of 85 or above.
M. LHA will monitor police contact monthly at LHA supported properties on a monthly basis to stabilize households through its family support program.

- **Responsible Program Participant(s):** The City of Lincoln and Lincoln Housing Authority (LHA)

- **Discussion:** Community feedback stressed the need to balance support given to existing neighborhoods, resident quality of life, and housing quality with the need to develop new housing. A majority of existing affordable housing opportunities are in established neighborhoods with an older housing stock. These actions were established to encourage public/private investment to maintain or rehabilitate the existing affordable housing stock. These actions were created to maintain existing collaborations and proposes new policies, conversations and partnership to address neighborhood stability and viability.

IMPEDIMENT #3: Lack of knowledge concerning fair housing

- **Metrics, Milestones, and Timeframe for Achievement:** The City of Lincoln and Lincoln Housing Authority will work to engage, implement and document actions below within the five-year strategic plan. Each AI impediment will have actions to address their contributing factors and fair housing issues.
- **Contributing Factors:** community opposition; private discrimination; lack of resources for fair housing agencies and organizations.
- **Fair Housing Issues:** segregation/integration; disparities in access to opportunity; publicly supported housing analysis; fair housing enforcement.
- **Goals & Actions:**

Implement fair housing education through workshops and fair housing support services

A. The City of Lincoln will hold a civil rights conference annually.
B. The City of Lincoln's Commission on Human Rights will engage in 50 plus community outreaches annually.
C. The City of Lincoln Commission on Human Rights and LHA will educate all new voucher holders from 2018-2023 in regular new voucher briefing sessions.
D. Urban Development Department will create a fair housing education module by the end of 2020 that can be incorporated in educational settings such as Lincoln public schools, refugee resettlement specialists etc.

Support fair housing enforcement efforts

A. The City of Lincoln will support the Commission of Human Rights as an approved HUD agency to investigate discrimination.
B. The City of Lincoln will work to identify funding over the next five years to assist the Commission on Human Rights to conduct fair housing testing.

Support fair housing marketing efforts

A. Urban Development Department will publish information annually on fair housing in the Urban Development Department's Urban Page Newsletter.
B. Urban Development Department will propose to include fair housing information in Lincoln Public School information distribution systems annually.
C. Urban Development Department will seek to include fair housing information in Lincoln Electric System, Lincoln Water System utility statements and in the public transportation system by 2020.
D. Urban Development Department will include fair housing information in annual apartment management licensing renewal correspondence starting within six months of Building and Safety's electronic system being deployed.
E. LHA will publish information on fair housing at least once per year in the Lincoln Housing Authority Landlord Newsletter, The Lighthouse.
F. LHA will publish information on fair housing at least once per year in the Lincoln Housing Authority Tenant Newsletter, LHA Today.
G. LHA will conduct monthly outreach to explain programs to community organizations. LHA will conduct at least 20 outreach events annually.

- **Responsible Program Participant(s):** The City of Lincoln and Lincoln Housing Authority
- **Discussion:** This assessment indicated the continuing need for fair housing outreach, education**,** and enforcement to combat community opposition, private discrimination, and a lack of resources for fair housing enforcement. These actions were developed to create new platforms to inform and encourage compliance with fair housing laws.

IMPEDIMENT #4: Lack of access to information about, affordable homeownership and rental opportunities throughout the city

- **Metrics, Milestones, and Timeframe for Achievement:** The City of Lincoln and Lincoln Housing Authority will work to engage, implement and document actions below within the five-year strategic plan. Each AI impediment will have actions to address their contributing factors and fair housing issues.
- **Contributing Factors:** community opposition; private discrimination; lack of public investments in specific neighborhoods, including services or amenities; source of income discrimination.
- **Fair Housing Issues: s**egregation/integration; disparities in access to opportunity; disproportionate housing needs; publicly supported housing analysis; disability and access analysis.
- **Goal & Actions:**

  Increase access to opportunities

  A. The City of Lincoln will collaborate with an appropriate partner in 2019 to create a credit improvement module to be used in appropriate educational courses.
  B. The City of Lincoln will collaborate with league of human dignity to fund reduction of accessibility barriers over the next five years.
  C. The City of Lincoln and LHA will provide 45 security deposit down payments annually or at a limit, that funding supports.
  D. The City of Lincoln will collaborate with the Greater Lincoln Workforce Development Board in 2019 to create an educational module for employers to share with their employees to promote stable housing via fair housing knowledge.
  E. The City of Lincoln will staff the local Continuum of Care, which serve homeless and near homeless clients over the next five years
  F. The City of Lincoln will develop a searchable database to communicate locations of existing licensed rental properties by 2019.
  G. LHA will conduct at least 20 outreach events annually to explain programs and services to community organizations.
  H. LHA will promote the Lincoln Housing Authority's forgivable down payment assistance program for new homeowners to it residents through the family self-sufficiency program over the next five years
  I. LHA will annually incorporate a landlord incentive program to the next MTW plan to increase the number of participating landlords and units available to Housing Choice Voucher participants.
  J. LHA will support and promote Nebraska Rentwise training for at least 500 lower income renters per year as funding allows.
  K. LHA will annually incorporate into their MTW plan a rent choice program to allow voucher participants to lease in higher cost units and areas.
- **Responsible Program Participant(s):** The City of Lincoln and Lincoln Housing Authority
- **Discussion:** The assessment recognize there is a concentration of lower income residents in core of Lincoln. These actions were crafted to assist residents with the opportunity to diversify their access to neighborhoods throughout the city.

IMPEDIMENT #5: Lack of access to education, and information about policies affecting public transportation

- **Metrics, Milestones, and Timeframe for Achievement:** The City of Lincoln and Lincoln Housing Authority will work to engage, implement and document actions below within the five-year strategic plan. Each AI impediment will have actions to address their contributing factors and fair housing issues.
- **Contributing Factors:** availability, type, frequency, and reliability of public transportation; access to transportation for person with disabilities.
- **Fair Housing Issues:** disparities in access to opportunity; disability and access analysis.

- **Goals & Actions**

  Improve access to public transportation

  A. The City of Lincoln will assess new development access to public transportation annually.
  B. The City of Lincoln will examine technology options to provide improved access to transportation options that will utilize both public & private investments in the next five years.
  C. The City of Lincoln will explore governance options for expanding transit and developing new revenue sources as outlined in the 2016 Transit Development Plan in the next five years.

  Improve reliable access to public transportation

  A. The City of Lincoln will annually work to reach its goal of increasing 'on-time' status to 85% of the time.
  B. The City of Lincoln will work to improve bus passenger amenities in accordance with the TDP

  Improve education about public transportation

  A. The City of Lincoln will restart their public transportation-marketing program to major employers to educate their workforce about transportation options.

  Review and Implement policies to improve public transportation

  A. The City of Lincoln over the next five years will support the Transit Development Plan phasing plan for improved public transportation options.
  B. The City of Lincoln over the next five years will explore governance options for expanding transit and developing new revenue sources as outlined in the 2016 Transit Development Plan.
  C. The City of Lincoln will continue to collect client information through a ridership survey every three years to better inform and educate our client base beginning in 2020.

- **Responsible Program Participant(s):** The City of Lincoln

- **Discussion:** Public transportation is a service required by many residents to access services and employment opportunities. The core has the highest levels of service. Again, community feedback stated that the availability of transportation influenced where some residents lived. The City of Lincoln conducted an extensive public transportation planning process that resulted in the development of the transit development plan. This plan seeks to improve and expand Lincoln public transportation system in a series of five phases as funding allows. These actions reflect that process.

IMPEDIMENT #6: Poor public perception of affordable housing, and neighborhoods with affordable housing

- **Metrics, Milestones, and Timeframe for Achievement:** The City of Lincoln and Lincoln Housing Authority will work to engage, implement and document actions below within the five-year strategic plan. Each AI impediment will have actions to address their contributing factors and fair housing issues.

- **Contributing Factors: c**ommunity opposition; lack of private investments in specific neighborhoods (private housing); lack of public investments in specific neighborhoods, including services or amenities
- **Fair Housing Issues:** segregation/integration; disproportionate housing needs; publicly supported housing analysis.
- **Goals & Actions**

  Support Lincoln's Neighborhoods that have affordable housing

  A. The City of Lincoln will assist 1000 contacts in the Neighborhood Revitalization Strategy Area through community building efforts annually to increase neighborhood livability or at a level, that funding permits.
  B. The City of Lincoln will draft a community indicator relating to fair housing knowledge in 2018.
  C. The City of Lincoln will provide administrative support to the Community Health Endowment in their work to improve neighborhood health over the next five years.
  D. The City of Lincoln will provide data and administrative support Mayor's Environmental Task Force
  E. The City of Lincoln will provide data and administrative support the Mayor's Stronger Safer Neighborhood Initiative.
  F. The City of Lincoln will provide data and administrative support to the Prosper Lincoln initiatives over the next five years.

G. The City of Lincoln will organize monthly neighborhood conversations through the Mayor's Neighborhood Roundtable.
H. The City of Lincoln will provide data and administrative support for NeighborWorks-Lincoln's Lincoln Policy Network.

Promote Affordable Housing Initiatives

A. The City of Lincoln & LHA will create five public service announcements promoting their programs and future affordable housing initiatives starting in 2018.
B. LHA will promote successes as a Moving to Work agency through its annual report to the community.
C. LHA will promote a homebuilding partnership with Lincoln Public Schools through an annual open house and press release.
D. LHA will promote new affordable housing development projects through an open house and press release upon completion of construction over the next five years.

- **Responsible Program Participant(s):** The City of Lincoln and Lincoln Housing Authority
- **Discussion:** Community feedback highlighted the need for neighborhood marketing. Preconceived or dated negative perceptions may impact where residents choose to live, invest and influence community opposition to new affordable housing initiatives. These actions continue to address that barrier.

IMPEDIMENT #7: Poor access to identified community and neighborhood assets

- **Metrics, Milestones, and Timeframe for Achievement:** The City of Lincoln and Lincoln Housing Authority will work to engage, implement and document actions below within the five-year strategic plan. Each AI impediment will have actions to address their contributing factors and fair housing issues.
- **Contributing Factors:** lack of private investments in specific neighborhoods (private housing); lack of public investments in specific neighborhoods, including services or amenities
- **Fair Housing Issues:** disproportionate housing needs
- **Goals & Actions**

Public Improvements

A. The City of Lincoln will continue the expansion of Lincoln's trail network to allow more residents access to opportunities over the next five years
B. The City of Lincoln will support 60 persons to engage in community gardening annually or at a level, that funding permits.
C. The City of Lincoln will assist the redevelopment of one park in a low to moderate income neighborhood annually.
D. The City of Lincoln will provide data and administrative support the Mayor's Stronger Safer Neighborhood Initiative.
E. The City of Lincoln will develop a draft plan for the development of public Wi-Fi in targeted low-income areas over the next five year.
F. The City of Lincoln will explore the creation of a community services management information system to create a single hub for collaboration between nonprofits, the community and the City of Lincoln over the next five years.
G. The City of Lincoln will explore ways of increasing disability parking opportunities over the next five years
H. The City of Lincoln will expand bike share sites to increase access to community assets over the next five years.
I. The City of Lincoln will annually review the prioritization of sidewalk maintenance to ensure equitable access to opportunities.
J. The City of Lincoln will explore and consider minimum parking requirements modifiers (i.e. within a distance of trails, and bus lines) in the Neighborhood Revitalization Strategic Area during their next comprehensive plan update in 2021.
K. The City of Lincoln will take areas of concentrated and persistent poverty into consideration when they create their neighborhood revitalization strategic area during the 2018-2023 strategic planning process

Private Improvements

A. The City of Lincoln will provide data and administrative support to Community Health Endowments work with the University of Nebraska Extension to improve healthy food access over the next five years or as funding allows.

- **Responsible Program Participant(s):** The City of Lincoln
- **Discussion:** A majority of existing affordable housing opportunities are in established neighborhoods with an older housing stock. Community feedback reflected the need to continue investment in existing neighborhoods to provide equal opportunity to community assets as the city continues to develop and grow. These actions respond to community input on the need for certain services, improvements and amenities.

COMPONENT 3: MAINTENANCE OF RECORDS

Describe Methods:
Staff will meet quarterly and update our progress on our website and records in the links below. A proposed break of yearly activities will be documented on the website. If time permits additional activities will be undertaken.

Link to website:

https://lincoln.ne.gov/city/urban/reports/index.htm

Supporting Material:
https://www.dropbox.com/sh/8kj7drnbm57ev86/AAAtXL1IgmwE550zRH-WvLdBa?dl=0

Link to Records:

Implementation Schedule -
https://docs.google.com/spreadsheets/d/1Rg1VM6K1JsoR6lLc3_CdMG9xAjPgQ_hBZajsqmRrLW4/edit?usp=sharing

Documentation –
https://www.dropbox.com/sh/pbcouen9h714pxe/AACkzfhf2ambViOSol8eKseKa?dl=0