



Proposed 2022-2026 Analysis of Impediments to Fair Housing Choice

For CDBG & HOME Programs

Prepared by

**Crystal & Company (www.crystco.com)
for the
City of Independence, MO**

March 18, 2022

TABLE OF CONTENTS

Starts On Page

1.0 Executive Summary	1
2.0 Study Purpose and Methodology	4
3.0 City Of Independence Data Analysis	7
➤ Demographic Data	
➤ Incidence Of Disability Analysis	
➤ Income & Poverty Assessment	
➤ Education Assessment	
➤ Employment Assessment	
➤ Housing (Distress) Assessment	
➤ Environmental Health Hazard Exposure Assessment	
➤ Home Lending From HMDA Assessment	
4.0 Evaluation of City Of Independence Current Fair Housing Legal Status.....	24
5.0 Identification of Impediments To Fair Housing Choice	32
6.0 FY 2022-2026 City of Independence Analysis of Impediments	38
7.0 Conclusions, Recommendations and the City Of Independence Fair Housing Action Plan.....	42

1.0 Executive Summary

The City of Independence secures an entitlement allocation of Community Development Block Grant (CDBG) and HOME funds each year. CDBG and HOME funding continues to assist low-income people in the community. A mandate in the past on the receipt of CDBG and HOME resources is the requirement that Independence have a current Consolidated Plan that incorporates citizen participation in establishing local priorities for spending such funds (rule remains in effect) as well as a current Assessment Of Fair Housing (AFH) that is synonymous with the Analysis of Impediments to Fair Housing Choice (AI) Study term used throughout this report. Certifications in the Consolidated Plan indicate that Independence will “affirmatively further fair housing. HUD has recently issued new, Interim Federal Rule (AFFH Rule, 86 FR 30779) that took effect July 31, 2021 regarding planning rules associated with fair housing. Under the new IFR, a HUD program participant may determine how best to engage in the fair housing planning process, so long as it can appropriately certify that it is meeting the affirmative furthering fair housing (AFFH) obligation, consistent with the restored definition of AFFH. Towards this end, the City of Independence elected to generate and implement this new Analysis of Impediments To Fair Housing Choice (AI) report covering FY 2022 to 2026 to be in compliance with federal regulations.

In the course of preparing the City of Independence AI, two citizen participation meeting were held on November 8, 2021 and April 6, 2022 to elicit input and secure comments on the draft. In addition, the draft AI document was subjected to a 30-day formal comment period from March 21, 2022 to April 21, 2022. The aforementioned actions were taken in collaboration with the preparation of the City’s FY 2022-’26 Consolidated Plan, FY 2022-’23 Action Plan and FY 2022-’26 Citizen Participation Plan.

The HUD Office of Fair Housing and Equal Opportunity often utilizes the AI as the basis for review of efforts by Independence to affirmatively further fair housing. Independence understands that:

- Every act of housing discrimination is harmful to the individual and to the community;
- It will endeavor to identify those areas where people in constitutionally protected classes have faced discrimination in housing in any number and at any level; and,
- It will continue to develop programs, processes or solutions to eliminate the discrimination.

Independence’s AI is intended to assess problems associated with people’s ability to choose a place to live with the only condition on that choice being affordability. The AI seeks to identify legitimate problem areas experienced by people in constitutionally protected classes and establishes a prudent approach to foster opportunities in Independence for fair housing choice. Impediments are defined in this process as any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restricts housing choices of these protected classes. The term “fair housing choice” means: “The ability of persons of similar income levels in the same housing market area to have a like range of choices available to them regardless of race, color, religion, national origin, sex, and disability”.

Understanding the functional relationship between income level and fair housing choices are important because lower income persons are often members of protected classes.

Summary of Independence Impediments Identified

The following general impediments were identified and refer to detailed information in Section 6.0 of the report for more information.

- ✓ Evidence of Housing Discrimination – A survey of Independence residents and other stakeholders reveals that housing discrimination does exist. Increased public support and awareness is needed. Additionally, the results of the housing discrimination survey indicate that there is a need for more community education.
- ✓ A Range Of Affordable Housing Needed - Evidence that increased resources are needed to support the production of a range of affordable housing given the incidence of housing distress in the locality motivating the need for more affordable housing units.
- ✓ Equitable Receipt of Public Assisted Housing Resources – In the past, Hispanics in Independence have not received an equitable share of housing vouchers and this needs to be consistently tracked and mitigated going forward.
- ✓ Need for Community Education - The number and nature of the fair housing complaints being received from Independence residents continues to remain comparatively low.
- ✓ Minority/Poverty Concentrations - Minority and poverty concentrations exist in the central and western part of the city.
- ✓ Disability Accessibility - Disability access was the major factor motivating fair housing complaints in Independence according to the current and past volume of fair housing complaints filed with HUD. About 48% to 62% of fair housing complaints filed were for disability issues.
- ✓ Independence's Unified Development Ordinance and City Code - A review of the policies and practices of the City of Independence Zoning and Planning Codes indicates that these Codes do make specific reference to the accessibility requirements contained in the 1988 amendments to the Fair Housing Act. Municipal consideration be given to the adoption by Independence of a formal reasonable accommodation policy via ordinance for housing that informs and provides clear direction to persons with disabilities on the process for making a reasonable accommodation request.

Independence Fair Housing Action Plan, FY 2022-2026

Delineated in Section 7.0 of this report, general provisions of the Independence Fair Housing Action Plan are briefly summarized below. Refer to Section 7.0 for specific details.

- ✓ Increase the volume of affordable housing in Independence, improve the quality of that inventory, continue to offer a range of affordable housing types, ensure Hispanics secure their fair share of rental vouchers/public housing and work with area non-profits and housing organizations to tap homeownership opportunities.

- ✓ Prepare and publish a series public notices relating to aspects of fair housing in addition to the continuing participation with key organizations and sponsorship of events. Sustain usage of fair housing logos, referrals to key organizations, etc.
- ✓ Accelerate the level of community fair housing education through the distribution of flyers, city publications, transit advertisement, television media, training seminars and city internet facilities.
- ✓ Sustain a Limited English Policy in the Community Development Department.
- ✓ Collaborate with the local fair housing and other relevant entities to discourage discriminatory and predatory activities in the community. Continue to refer clients to appropriate non-profits, state and federal agencies for support.
- ✓ Partner with local and regional affordable housing/disability organizations to facilitate community education regarding fair housing in addition to how it pertains to disability issues.
- ✓ Continue to offer fair housing training to targeted Independence staff concerning ordinance review to further federal fair housing statutes.
- ✓ Continue to work with the local and regional lending and real estate entities to discourage predatory lending practices within the City of Independence.
- ✓ Continue to commit a variety of municipal programs for targeted infrastructure, public improvements, transportation and economic development endeavors to assist disadvantaged and minority persons.
- ✓ Enhance public transit opportunities in central and western Independence consistent with the city's adopted Comprehensive Plan for enhanced minority and disadvantaged population access to area employment opportunities.
- ✓ Derived from the 2016-2021 MARC Analysis of Impediments To Fair Housing Choice, consider the adoption by Independence of a formal reasonable accommodation policy via ordinance for housing that informs and provides clear direction to persons with disabilities on the process for making a reasonable accommodation request.
- ✓ Foster affordable and accessible housing in a range of unit sizes for disabled persons pursuant to the City of Independence Comprehensive Plan.
- ✓ Continue to implement the City of Independence Imagine Independence 2040 Comprehensive Plan through the strategic targeting of housing and community development resources projects for disadvantaged and minority persons in the locality as well as guidance in addressing fair housing mitigation issues via land use policies and regulations.

2.0 Study Purpose and Methodology

Who Conducted The Study?

The Independence Analysis of Impediments To Fair Housing Choice, 2022-'26 was prepared by the firm of Crystal & Company for the City of Independence, Missouri (MO). The firm is a specialist in planning and program development for affordable housing in the west. To date, the firm has prepared over 100 Consolidated Plans and affordable housing strategies for states, entitlement jurisdictions, HOME Consortium, Participating Jurisdictions and nonprofit agencies. The firm has also designed a host of affordable housing programs for state and local governments that include state small cities CDBG and HOME programs, mortgage revenue bonds and mortgage credit certificates, housing trust fund programs, low income housing tax credit qualified plans, the creation of state and local public housing authorities and assisted housing programs, single- and multi- family project underwriting standards, neighborhood and downtown financing initiatives, homeless and supportive housing programs as well as specific residential, commercial and mixed-use project design, development and finance for affordable and market-rate projects. The firm also conducts Arizona real estate brokerage and is licensed in Arizona. Refer to www.crystco.com for further information on the firm.

Participants & Methodology Employed

To assess the state of fair housing in Independence in 2021/'22, the following assessments were conducted:

- 1) community attitudes through public input meeting held on November 8, 2021 and April 6 of 2022 (input on the draft AI);
- 2) Independence fair housing online survey conducted in the Fall and Winter of 2021/'22;
- 3) enforcement data from the Fair Housing Assistance Program (FHAP) and Fair Housing Initiatives Program (FHIP agencies) were analyzed;
- 4) analyzed statistical data from public reporting sources that included the American Community Survey (ACS) from the US census, 2010 Independence census tract data, current Home Mortgage Disclosure Act (HMDA) data, Comprehensive Housing Affordability Strategy (CHAS) data used for HUD Consolidated Planning, and extensive information from CPD maps and policymap.com, etc;
- 5) analyzed previous AI and related studies/surveys undertaken in and for Independence, Specifically, these documents included the Metropolitan Kansas City Affirmatively Furthering Fair Housing Plan prepared by the Mid-American Regional Council (MARC) in November of 2016 and the Kansas City Regional Analysis of Impediments To Fair housing Choice prepared by BBC Research & Consulting in 2011;
- 6) prepared a regulatory review assessment through the completion of a formal survey by the locality; and,
- 7) other research conducted by Crystal & Company.

Statistical Analysis

Statistical analyses were undertaken from a host of public reporting sources that included the recent American Community Survey (ACS) from the US census, varying 2010 to 2019 Independence census tract and block group data, recent HMDA data, CHAS data used for HUD Consolidated Planning and mapping information derived from policymap.com, etc. Information collected and analyzed from these sources included the following:

- The tabular and spatial distribution of population by race and ethnicity within the City of Independence by census tract (2019 American Community Survey {ACS}) and the determination of minority concentrations for purposes of this report;
- The distribution of HMDA data and a comparison of such to the distribution of minority households in the community;
- The analysis of HUD fair housing related indicators initially noted in HUD AFH document guidelines and drawn from policymap.com.
- Recent (2019) demographic comparisons between the City of Independence and Jackson County and the State of Missouri concerning the distribution of the population by age and sex as well as race and ethnicity.
- Recent demographic comparisons between the City of Independence and Jackson County and the State of Missouri concerning inflation adjusted median income by race/ethnicity, household type and tenure and disability by age and sex.
- ✓ The analysis of housing needs (the incidence of cost burden and market affordability gaps) drawn from policymap.com and HUD CHAS data.

Review of Previous Studies

A host of studies were reviewed by the consultant in preparing the City of Independence AI, FY 2022-'26. They included the reports itemized below:

- ✓ Kansas City Regional Analysis of Impediments To Fair housing Choice prepared by BBC Research & Consulting in 2011
- ✓ Metropolitan Kansas City Affirmatively Furthering Fair Housing Plan prepared by the Mid America Regional Council (MARC) in November of 2016
- ✓ City of Independence Consolidated Plan, FY 2017-'22
- ✓ City of Independence Annual Action Plan, FY 2020
- ✓ City of Independence Draft Annual Action Plan, FY 2021
- ✓ Input from public hearing held November 8th, 2021 and April 6th, 2022
- ✓ Input from Independence online fair housing survey conducted in the Fall and Winter of 2021/2022
- ✓ Etc.

Regulation, Policy and Ordinance Review

A component of the Independence AI focused on regulations, policies and ordinances with potential impact on Fair Housing in the community. The assessment and analysis was done by completing a municipal survey with municipal staff by the Community Development Department within Independence municipal government. The survey

instrument was secured from HUD and completed by the Community Development Department Director.

Fair Housing Enforcement and Complaints

The City of Independence Fair Housing Coordinator, US Department of HUD District VII FH&EO and the Missouri Department of Labor - Missouri Commission On Human Rights (MCHR) were contacted concerning fair housing enforcement and complaint data evident in Independence from the period 2016 to date. All of this information was analyzed to establish any applicable trends and salient issues that appear to be surfacing in the community.

Targeted Resident Survey

An online survey of personal experience associated with fair housing was disseminated in the Winter of 2021/'22. The online survey was not intended to be scientific or statistically valid. It was intended to see if anecdotal experience would shed light on issues identified in the areas of inquiry and to give people an opportunity to identify other problems that limited choice in securing a place to live in Independence. The survey asked people to target their comments to their experience in Independence. The online survey was generated for distribution by the city in both English and Spanish.

3.0 Jurisdictional Data Analysis

Demographic Assessment

A host of demographic data was compiled and analyzed for this report from the US Census. Analyses at the census tract level were derived from American Community Survey estimates from 2019.

Independence Census Tract (2010 Tracts)	Total Population	Total Minority	Percent Minority	Tracts W More % Minorities Than The % City Average	Anglo	Hispanic	Black	Native American	Asian	Native Hawaiian and Other Pacific Islander	Other Race	Two or More Races
Census Tract 110	4,961	1,413	28.5%	Yes	3,548	776	455	36	28	0	0	118
Census Tract 112	3,056	996	32.6%	Yes	2,060	190	235	30	24	147	266	104
Census Tract 113	5,424	1,010	18.6%	No	4,414	375	298	14	32	84	0	207
Census Tract 114.01	7,835	1,812	23.1%	No	6,023	515	420	73	118	399	39	248
Census Tract 114.05	3,940	1,738	44.1%	Yes	2,202	531	704	37	0	163	265	38
Census Tract 114.06	5,670	1,169	20.6%	No	4,501	343	532	19	23	83	147	22
Census Tract 115	5,884	2,201	37.4%	Yes	3,683	493	966	0	0	380	267	95
Census Tract 116	5,181	848	16.4%	No	4,333	314	191	0	29	0	0	314
Census Tract 117	3,755	1,267	33.7%	Yes	2,488	656	424	0	78	0	18	91
Census Tract 118	4,476	1,163	26.0%	Yes	3,313	433	345	13	0	0	0	372
Census Tract 119	3,361	957	28.5%	Yes	2,404	382	197	31	106	0	179	62
Census Tract 120	3,492	1,066	30.5%	Yes	2,426	385	292	7	54	0	278	50
Census Tract 121	5,512	1,745	31.7%	Yes	3,767	987	448	72	92	0	0	146
Census Tract 122	6,386	1,665	26.1%	Yes	4,721	865	460	0	65	0	26	249
Census Tract 123	3,513	259	7.4%	No	3,254	41	134	0	3	0	0	81
Census Tract 124	3,945	1,124	28.5%	Yes	2,821	397	460	20	97	0	0	150
Census Tract 145.01	3,801	643	16.9%	No	3,158	99	368	29	28	0	0	119
Census Tract 145.02	4,268	418	9.8%	No	3,850	161	149	0	12	0	0	96
Census Tract 146.01	5,276	907	17.2%	No	4,369	164	501	0	0	0	216	26
Census Tract 146.03	3,597	685	19.0%	No	2,912	197	106	0	217	14	0	151
Census Tract 147.01	3,883	832	21.4%	No	3,051	283	332	0	66	117	0	34
Census Tract 147.02	4,939	700	14.2%	No	4,239	170	170	0	188	8	0	164
Census Tract 148.04	2,955	397	13.4%	No	2,558	88	124	19	90	0	52	24
Census Tract 156	2,371	1,341	56.6%	Yes	1,030	903	276	65	34	0	0	63
Census Tract 177	5,003	461	9.2%	No	4,542	156	30	30	70	50	45	80
Independence Total	112,484	26,817	23.8%		85,667	9,904	8,617	495	1,454	1,445	1,798	3,104
Percent of Total		23.8%			76.2%	8.8%	7.7%	0.4%	1.3%	1.3%	1.6%	2.8%

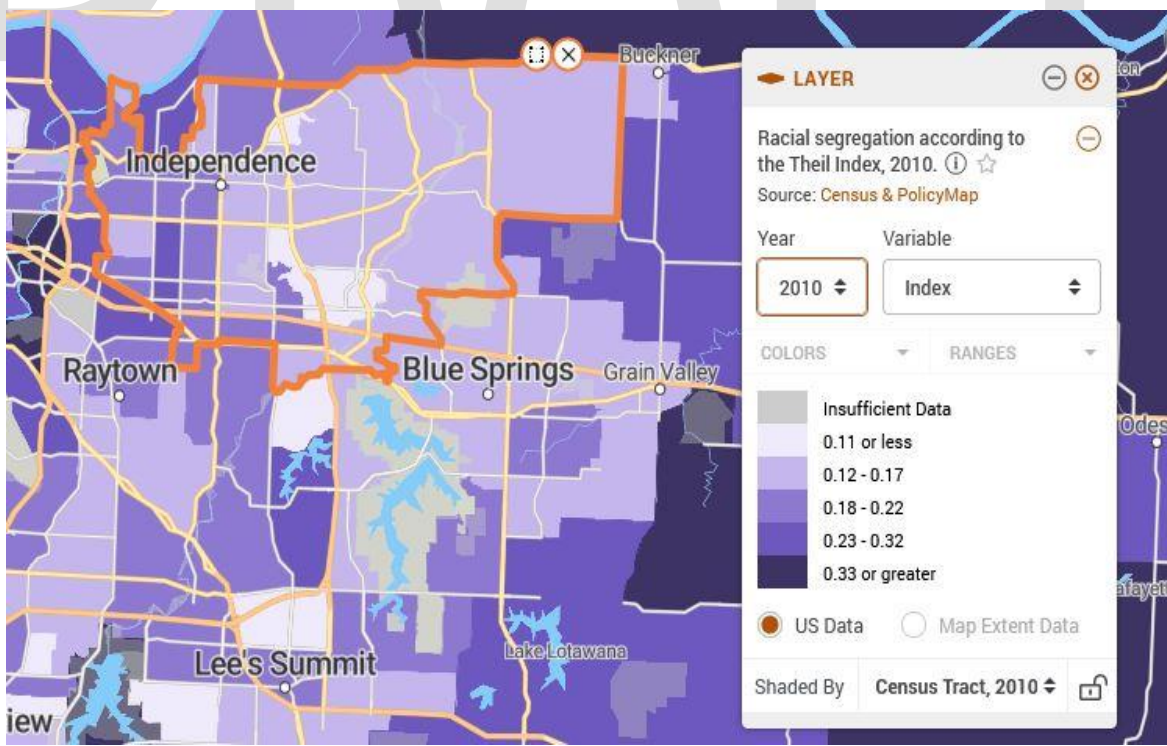
Source: US Census, ACS, 2019.

Race and ethnicity analyzed at the census tract level offer insights into concentrations of minorities within Independence. One of the data items most pertinent are racially/ethnically concentrated areas of poverty (R/ECAP). R/ECAP areas are census tracts where more than half the population is non-White and 40% or more of the population is in poverty OR where the poverty rate is greater than three times the average poverty rate in the area (with revisions to these formula for non-urban areas). This designation is derived from Assessment of Fair Housing (AFH) standards. Census

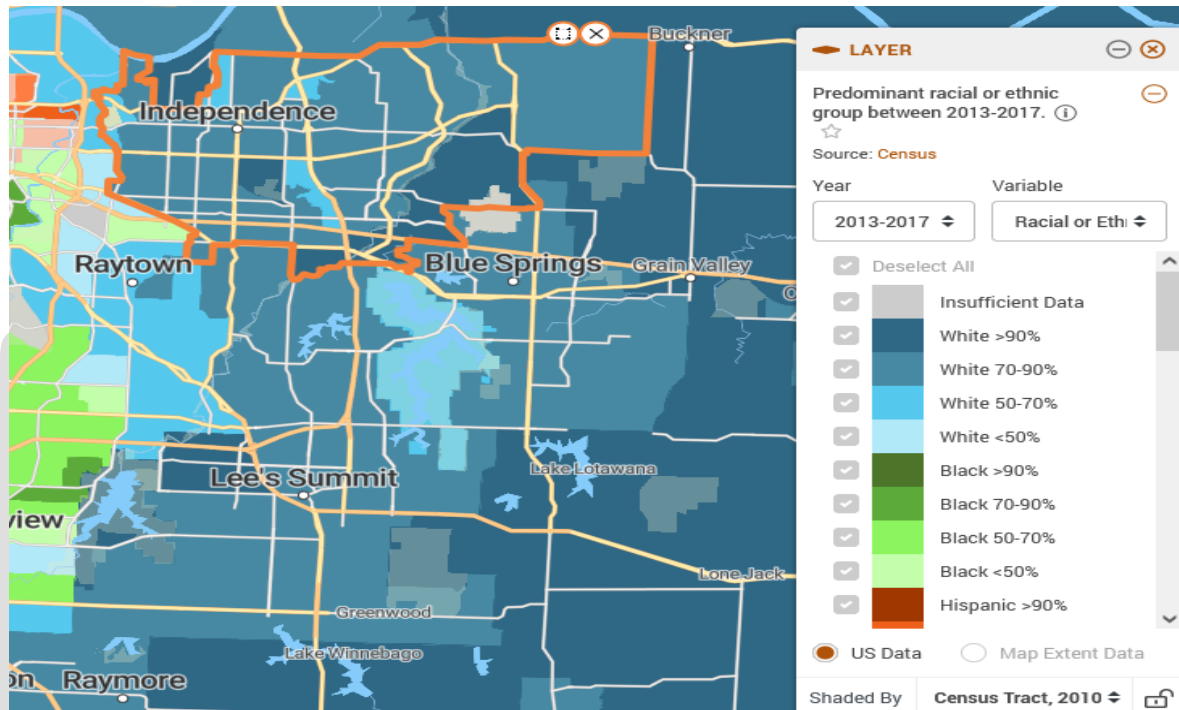
information from 1990 – 2010 was also evaluated. No R/ECAP areas were evident in Independence for 1990 through 2010. The 2010 R/ECAP map is presented below and 2020 data is not yet available.



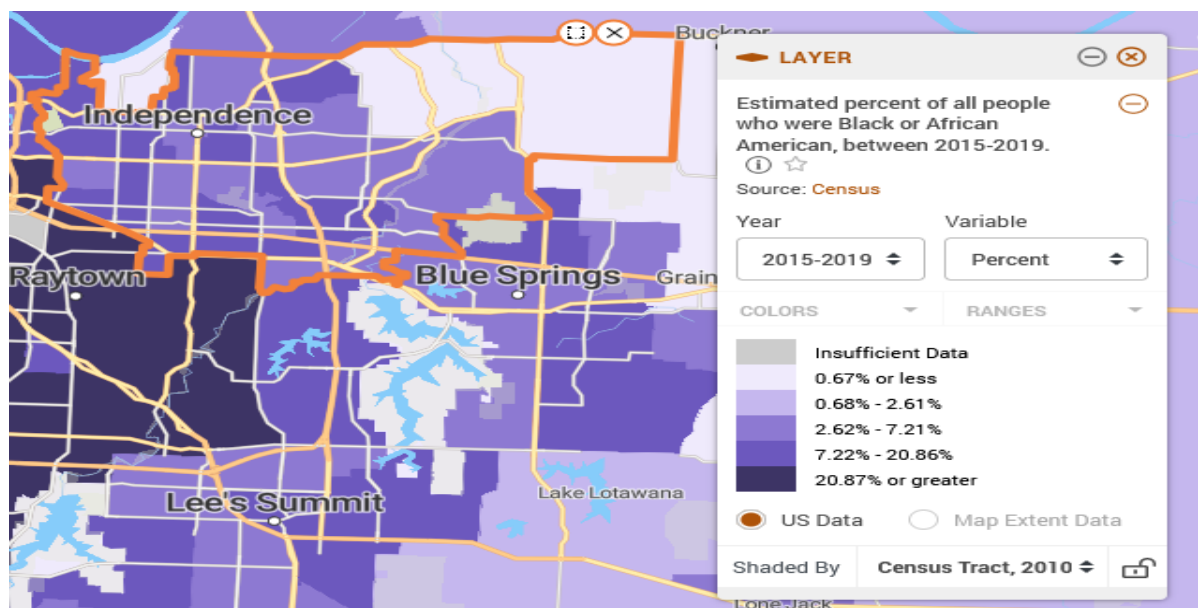
The segregation or Theil index that follows was generated by HUD and offers an insight into the incidence of such in 2010 (2020 not yet available). If neighborhoods within Independence exhibit a very different racial composition than the city as a whole the Index will be higher, suggesting a higher level of segregation and vice-versa. So the Independence tracts in the west in darker blue represent segregation hotspots.



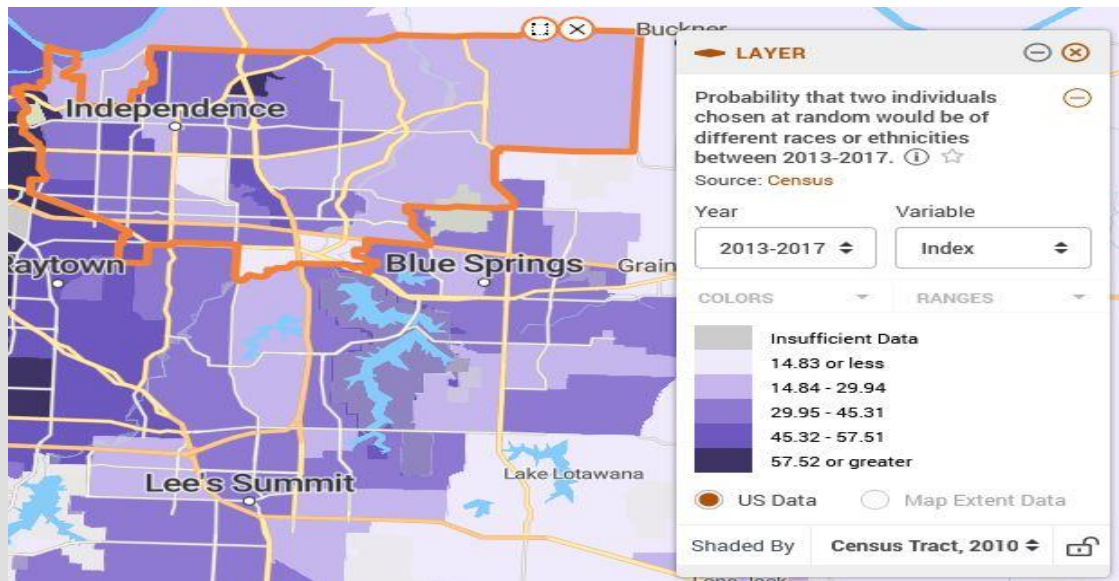
Presented in the table on page 7, those census tracts with minority populations exceeding the Independence citywide average of 23.8% are highlighted in red as 'Yes'. African Americans constitute the highest percentage of any single minority group in Independence at 10.7% of total population in 2019. The spatial distribution of racial and ethnic groups in Independence from 2013-2017 is depicted in the following map.



The chart below offers insight into the distribution of the primary minority group of African Americans in Independence. The western part of the community sees somewhat higher concentrations of African Americans.



The HUD Diversity Index for Independence is defined as the probability that two individuals chosen at random would be of different races or ethnicities is presented below for 2013-2017 (latest data available). The diversity index measures racial segregation and integration, or diversity, at the regional level based on variation within jurisdictions. This approach compares the population of Whites and African Americans relative to each other and uses local data to measure jurisdictional diversity relative to the total population of both groups, thus allowing a national picture of regional segregation patterns within jurisdictions to emerge. In Independence, the index simply reinforces more diversity (not Anglo) in the western portion of the community with the most evident near the northwest border of Independence.



Compared with Missouri and Jackson County in 2019, Independence's population tends to contain a similar age distribution and more minorities than Missouri but less than Jackson County.

Demographic Item	Missouri	%	Jackson County	%	Independence	%
Total Population	6,137,428	100.0%	703,011	100.0%	116,673	100.0%
Male	3,008,169	49.0%	339,789	48.3%	55,897	47.9%
Female	3,129,259	51.0%	363,222	51.7%	60,776	52.1%
Under 5	365,451	6.0%	45,151	6.4%	9,669	8.3%
5 to 9	380,818	6.2%	43,550	6.2%	8,408	7.2%
10 to 14	391,770	6.4%	48,381	6.9%	7,801	6.7%
15 to 19	398,235	6.5%	42,557	6.1%	5,959	5.1%
20 to 24	394,992	6.4%	42,657	6.1%	6,503	5.6%
25 to 34	823,722	13.4%	109,697	15.6%	17,853	15.3%
35 to 44	756,709	12.3%	89,807	12.8%	13,472	11.5%
45 to 54	730,645	11.9%	82,061	11.7%	12,367	10.6%
55 to 59	420,294	6.8%	47,408	6.7%	7,857	6.7%
60 to 64	416,849	6.8%	43,770	6.2%	6,889	5.9%
65 to 74	609,250	9.9%	63,069	9.0%	10,649	9.1%
75 to 84	327,032	5.3%	32,258	4.6%	5,896	5.1%
85 and up	121,661	2.0%	12,645	1.8%	3,350	2.9%
Median Age	39	na	37	na	37	na
Race	6,137,428	100.0%	703,011	100.0%	116,673	100.0%
White	5,022,939	81.8%	472,083	67.2%	85,899	73.6%
Black	703,058	11.5%	161,954	23.0%	12,491	10.7%
Native American	25,516	0.4%	2,283	0.3%	513	0.4%
Asian	127,154	2.1%	13,066	1.9%	2,915	2.5%
Native Hawaiian/Pac. Islander	10,214	0.2%	2,485	0.4%	1,752	1.5%
Other	76,294	1.2%	28,513	4.1%	9,786	8.4%
Two or More	172,253	2.8%	22,627	3.2%	3,317	2.8%
Total Hispanic or Latino (Any Race)	264,334	4.3%	64,986	9.2%	10,919	9.4%
Not Hispanic or Latino	5,873,094	95.7%	638,025	90.8%	105,754	90.6%
White Alone, Not Hispanic or Latino	4,854,400	79.1%	435,027	61.9%	82,881	71.0%
Total Minority Population	1,283,028	20.9%	267,984	38.1%	33,792	29.0%

Source: American Community Survey, 2019

Further demographic information from 2019 regarding housing tenure by race/ethnicity and household type reflected a similar incidence of housing tenure as Missouri and Jackson County and a slightly lower proportion of African American renters and homeowners. Independence also includes a higher proportion of households comprised of females with no husband present. These households typically tend to be more at-risk of distress.

Item	Missouri	%	Jackson County	%	Independence	%
Total Population	6,137,428	n/a	703,011	n/a	116,673	n.a
Persons Per Household	2.50	n/a	2.40	n/a	2.47	n/a
Households	2,458,337	100.0%	292,571	100.0%	47,329	100.0%
Families	1,546,045	62.9%	169,941	58.1%	28,617	60.5%
With Children Under 18	692,909	28.2%	79,227	27.1%	14,324	30.3%
Female householder, no husband present	175,288	7.1%	24,630	8.4%	5,810	12.3%
Occupied Housing Units	2,458,337	100.0%	292,571	100.0%	47,329	100.0%
Owner Occupied	1,650,019	67.1%	169,643	58.0%	27,257	57.6%
Renter Occupied	808,318	32.9%	122,928	42.0%	20,072	42.4%
Renter Occupied Units By Race	808,318	100.0%	122,928	100.0%	20,072	100.0%
White	574,872	71.1%	72,134	58.7%	14,207	70.8%
Black	173,634	21.5%	40,181	32.7%	3,544	17.7%
Native American	5,648	0.7%	721	0.6%	0	0.0%
Asian	19,948	2.5%	1,799	1.5%	352	1.8%
All Other	34,216	4.2%	8,093	6.6%	1,969	9.8%
Hispanic of Any Race	35,926	4.4%	9,281	7.5%	1,369	6.8%
Owner Occupied Units By Race	1,650,019	100.0%	169,643	100.0%	27,257	100.0%
White	1,481,955	87.4%	134,468	89.1%	24,481	91.0%
Black	107,414	2.1%	26,474	2.4%	912	1.5%
Native American	5,073	2.6%	722	0.8%	0	0.6%
Asian	26,559	2.0%	2,332	2.4%	305	2.8%
All Other	29,018	5.8%	5,647	5.2%	1,559	4.0%
Hispanic of Any Race	37,447		10,697		1,616	

Source: American Community Survey, 2019.

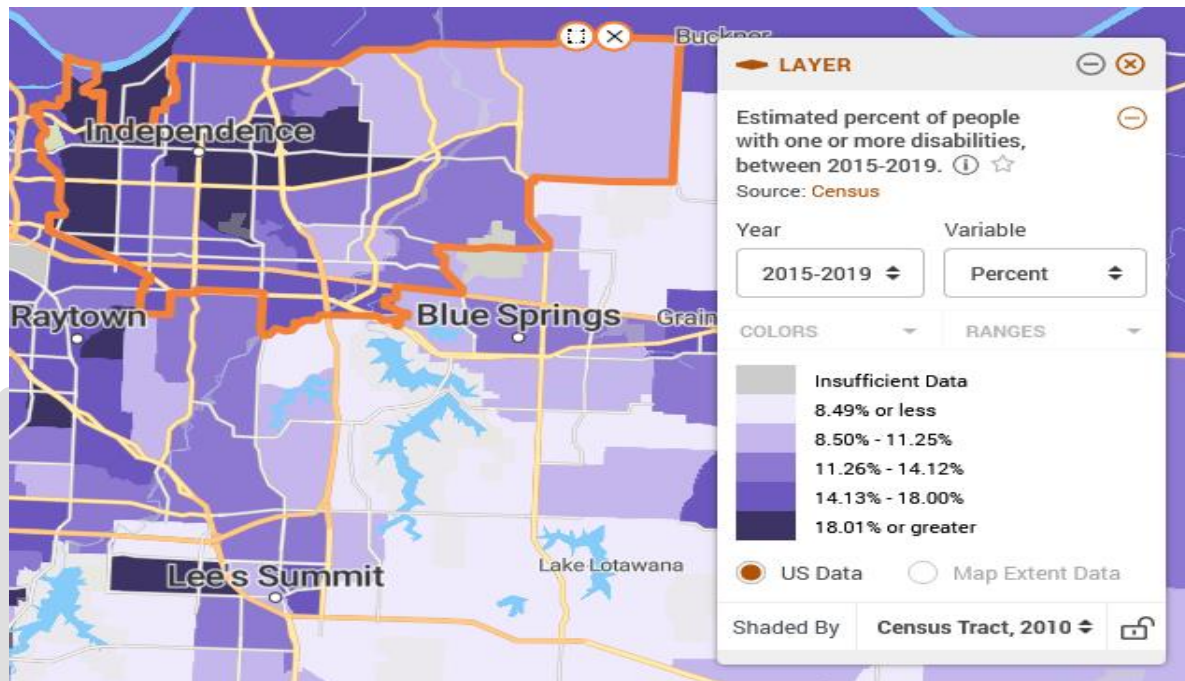
Incidence Of Disability Assessment

In terms of persons with a disability and not institutionalized, the incidence of such in Independence was somewhat more than Missouri and Jackson County in 2019 and a bit more prevalent among young men (5 to 17) and working age women (36 to 64).

Item	Missouri	%	Jackson County	%	Independence	%
Total Population (Non-Institutionalized)	6,020,665	n/a	695,889	n/a	115,509	n/a
Percent of Population With A Disability & Not Institutionalized	14.7%	n/a	13.3%	n/a	15.8%	n/a
Total Non-Institutionalized Persons With A Disability	887,896	n/a	92,647	n/a	18,200	n/a
Non-Institutionalized Males With A Disability	435,510	100.0%	43,377	100.0%	9,357	100.0%
Under Age 5	819	0.2%	57	0.1%	0	0.0%
Age 5 to 17	40,509	9.3%	3,986	9.2%	1,489	15.9%
Age 18 to 34	59,676	13.7%	6,797	15.7%	1,222	13.1%
Age 35 to 64	167,536	38.5%	17,335	40.0%	2,920	31.2%
Age 65 to 74	81,870	18.8%	6,976	16.1%	1,617	17.3%
Over 75	85,100	19.5%	8,226	19.0%	2,109	22.5%
Non-Institutionalized Females With A Disability	452,386	100.0%	49,270	100.0%	8,843	100.0%
Under Age 5	1,282	0.3%	340	0.7%	0	0.0%
Age 5 to 17	22,974	5.1%	2,441	5.0%	212	2.4%
Age 18 to 34	48,984	10.8%	5,240	10.6%	519	5.9%
Age 35 to 64	183,467	40.6%	21,132	42.9%	4,184	47.3%
Age 65 to 74	80,952	17.9%	8,024	16.3%	1,615	18.3%
Over 75	114,727	25.4%	12,093	24.5%	2,313	26.2%

Source: American Community Survey, 2019.

The population with a disability that were not institutionalized in 2019 is depicted in the following map, with central and west Independence indicating the highest concentrations.

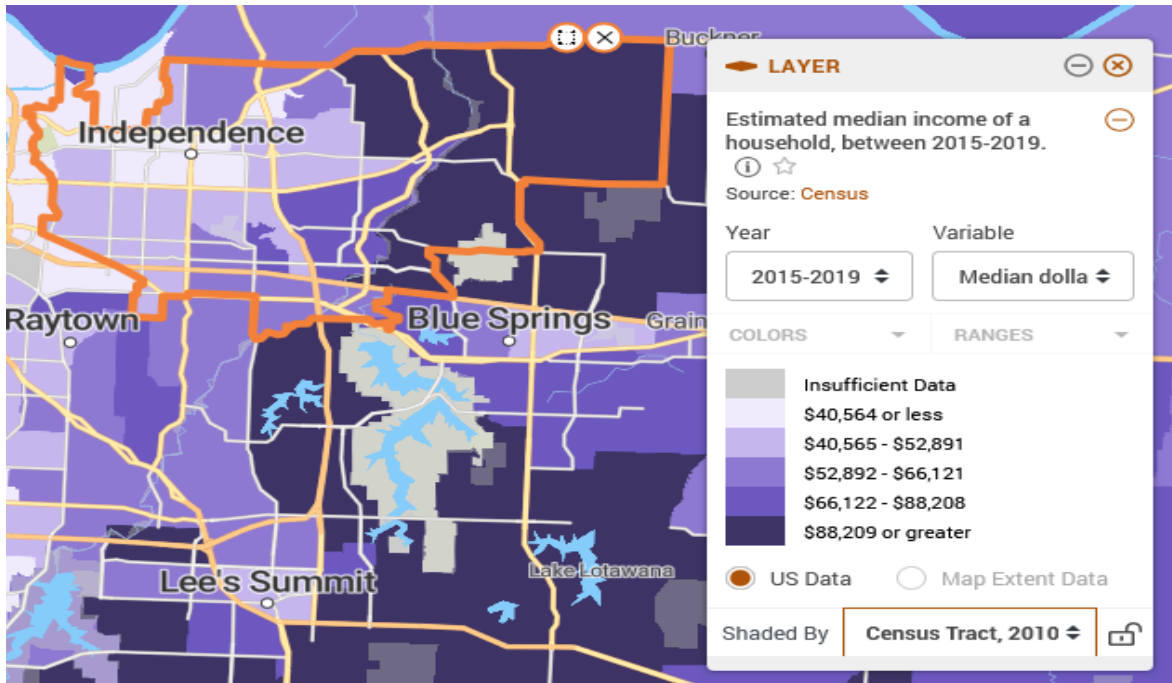


Drawn from the Mid-America Regional Council (MARC) Affirmatively Furthering Fair Housing Plan in 2016, “Independence has 18,562 persons with disabilities”. By age, 5.9 percent of all children and youth age 5-17 years have a disability; 14.6 percent of the working age (18-64) population have a disability, and 38.9 percent of elderly persons (>65) have a disability. Of the city’s persons with disabilities, those with an ambulatory disability numbered 10,857, followed by cognitive disability affecting 7,320 persons. 54 percent of the city’s population resides in neighborhoods with high concentrations of persons of color and those in poverty, and a slightly higher 57 percent of the disabled reside in these neighborhoods. The Independence Citizens with Disabilities Advisory Board conducted a survey in 2013 of transit service routes and bus stops along five routes in the city of Independence. Improvements needed for some stops were identified, including concrete waiting areas with wheelchair ramps, need for shelters and benches. The city of Independence, Missouri, operates paratransit services within its city limits. While 31.7% of the region’s public housing occupants were disabled in 2016 (and somewhat less for other HUD housing programs), Independence does offer publically supported housing for disabled persons in need.”

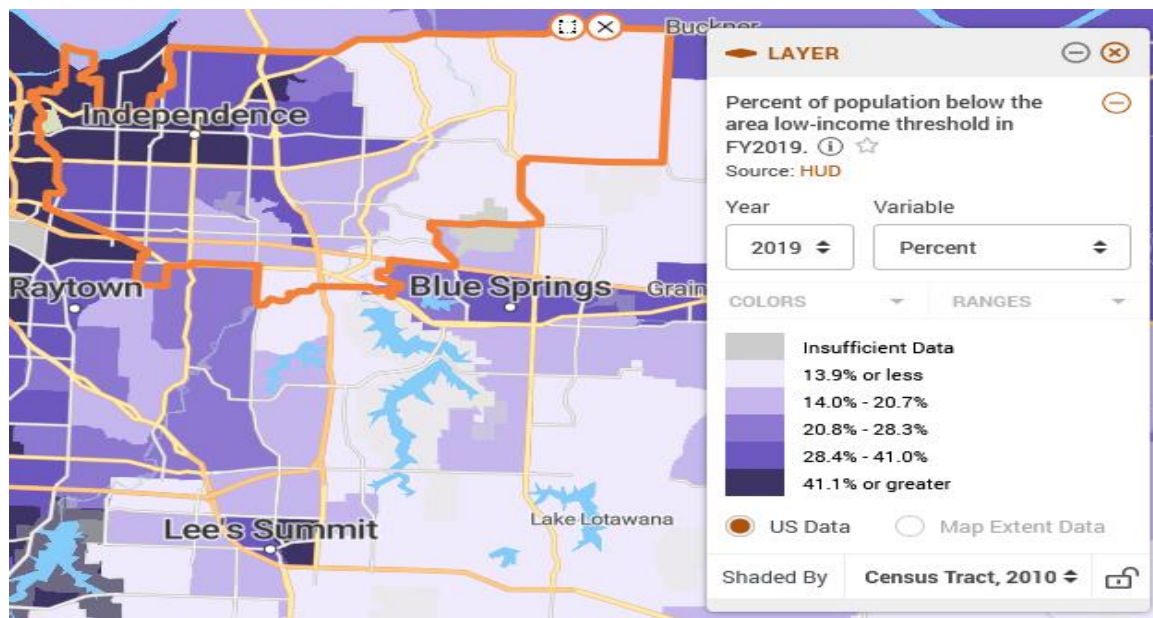
Going forward, Independence will continue to foster access to proficient schools, publically supported housing and transportation for disabled persons, mitigate inaccessible structures, public infrastructure and governmental services, strengthen the availability/accessibility of affordable dwellings in a variety of sizes, enhance the easy transition from institutional to integrated dwellings, enhance needed supportive services and be cognizant of regulatory barriers that adversely affected disabled persons.

Income & Poverty Assessment

The distribution of median household income in 2019 follows for Independence. Again, portions of western and central Independence evidence lower income regions consistent with information presented earlier.



Refer to the map below evidencing the incidence of low income households in 2019 which obviously correlates with the incidence of heightened distress in some of the western and central portions of Independence.

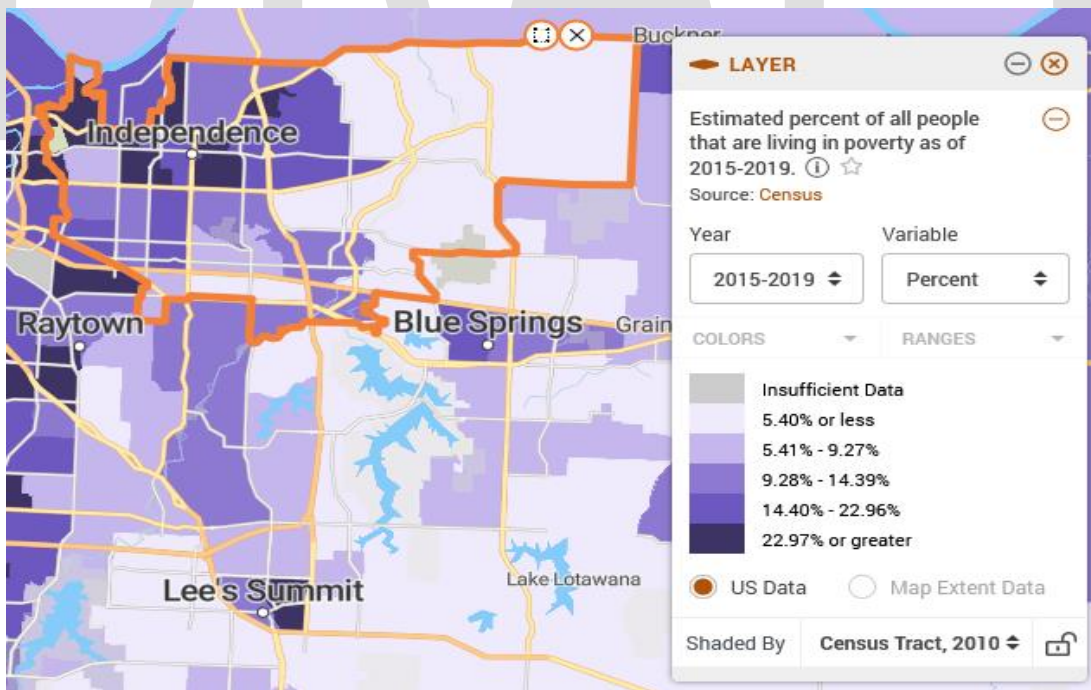


In 2019, the median income of \$53,235 was **about 8% less** than both Missouri and Jackson County. For the African American population, median income in Independence was **almost 20% less** than Missouri and Jackson County.

Median Income By Race/Ethnicity	Missouri	Jackson County	Independence
Total	\$57,409	\$57,936	\$52,325
White	\$60,756	\$66,087	\$56,459
Black	\$39,102	\$38,885	\$31,440
Native American	\$31,186	\$60,986	n/a
Asian	\$75,505	\$42,183	\$49,934
Hawaiin & Pacific Islander	\$48,300	n/a	n/a
White, Not Hispanic	\$60,954	\$68,024	\$55,322
Hispanic (any race)	\$50,839	\$47,260	\$51,945

Source: American Community Survey, 2019

The distribution of households in poverty in Independence in 2019 is depicted in the following map and appears to be concentrated in the western and central sections of the community.



As expected, the incidence of families in poverty in Independence in 2019 is more than Missouri and Jackson County with significantly higher concentrations among at-risk households comprised of single women with and without children under age 18.

Item	Missouri	% In Poverty	Jackson County	% In Poverty	Independence	% In Poverty
Total Families	1,546,045	n/a	169,945	n/a	28,617	n/a
Families In Poverty	136,052	8.8%	15,466	9.1%	4,035	14.1%
Married Couples	1,160,554	n/a	119,016	n/a	19,230	n/a
Married Couples in Poverty	47,583	4.1%	3,570	3.0%	769	4.0%
Married Couples With Kids Aged Less Than 18	450,010	n/a	48,418	n/a	7,906	n/a
Married Couples With Kids Aged Less Than 18 In Poverty	23,400	5.2%	1,839	3.8%	435	5.5%
Females With No Husband Present	274,071	n/a	38,729	n/a	8,051	n/a
Females With No Husband Present In Poverty	70,710	25.8%	12,006	31.0%	3,148	39.1%
Females With Kids < 18 With No Husband Present	175,288	n/a	24,630	n/a	5,810	n/a
Females With Kids < 18 With No Husband Present	61,350	35.0%	10,492	42.6%	2,981	51.3%
Total Population For Which Poverty is Defined	5,953,025	n/a	691,159	n/a	115,075	n/a
Population In Poverty	770,175	12.9%	93,256	13.5%	19,820	17.2%

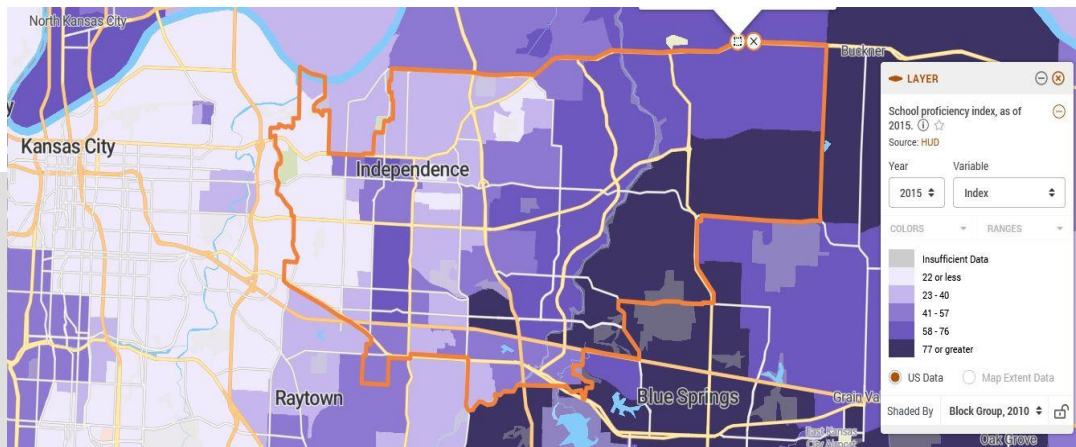
Source: 2019 American Community Survey.

Education Assessment

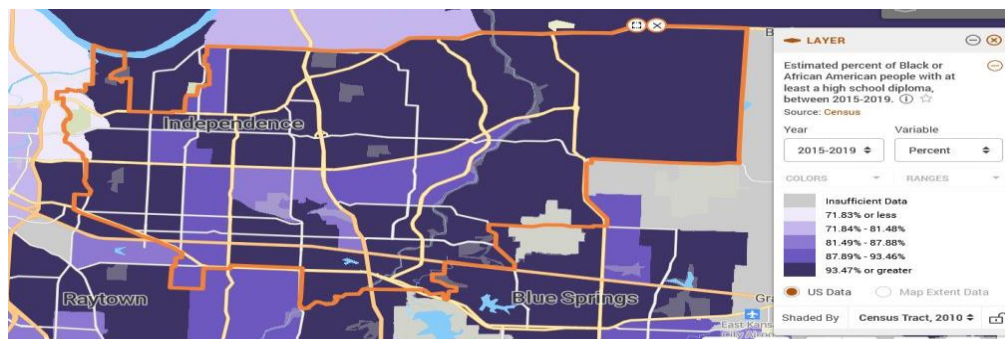
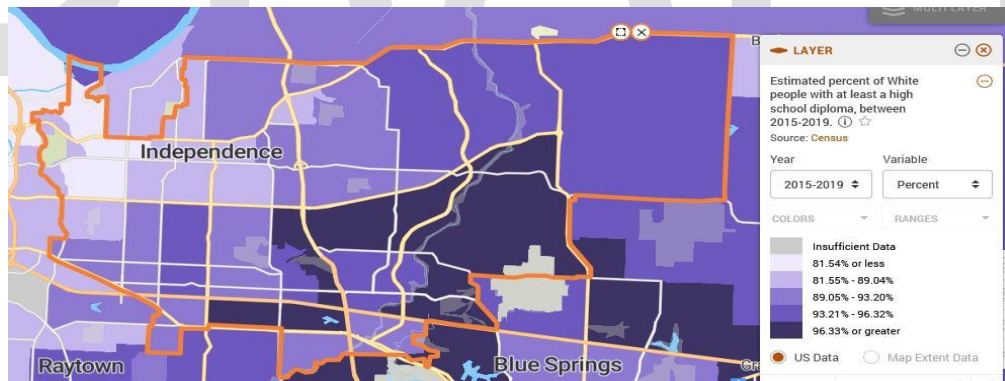
Drawn from the 2106 MARC fair housing study noted earlier, “The city is primarily served by the Independence School District, with 71 percent free and reduced lunch and 38 percent non-white. The school proficiency index is low across races, with somewhat higher scores for Asian and white students. According to HUD-provided data, the level of school proficiency is lower in Independence and Leavenworth than the region as a whole, but consistent across races. This is the result of having a single school district, or very few school districts, within each city. Both Blue Springs and Independence share relatively low levels of disparity in access to proficient schools by race. This dynamic is likely explained by the relative homogeneity of their populations, the relative lack of segregation within their boundaries (as distinct from segregation between those cities and the surrounding area)... The one major caveat to this overall pattern is that Hispanic residents and persons of Mexican national origin have modestly but noticeably less access to proficient schools than do members of other groups in Independence. Additionally, the disproportionately high level of access to proficient schools for Native American residents in Independence would appear to be a product of the very small population of Native Americans in the area rather than a reflection of something deeper. Independence falls somewhat below regional school proficiency scores, but is fairly even across races.”

As noted repeatedly in this study and affirmed by MARC, “The city of Independence has some concentration of people of color in its western reaches, and becomes increasingly white to the east where there are more job opportunities and services. However, because it is served by a single school district, children across the city have access to better educational opportunities”.

Refer to the 2015 school proficiency index below. Generated by HUD, it uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. The school proficiency index is a function of the percent of 4th grade students proficient in reading and math on state test scores.

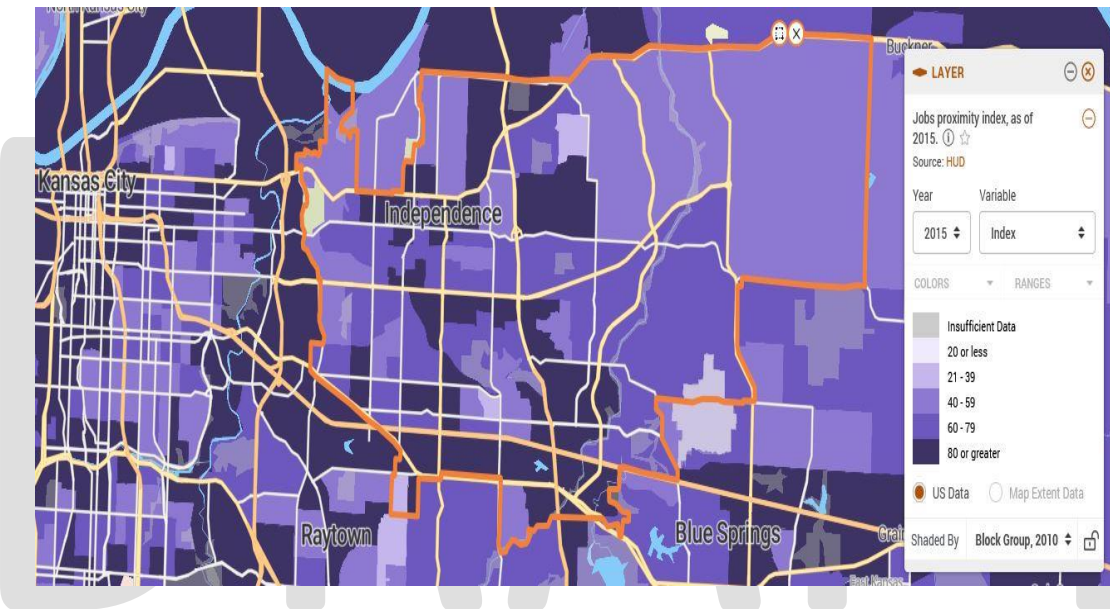


Note the following distributions of high schools graduates plus for Anglos and African Americans.

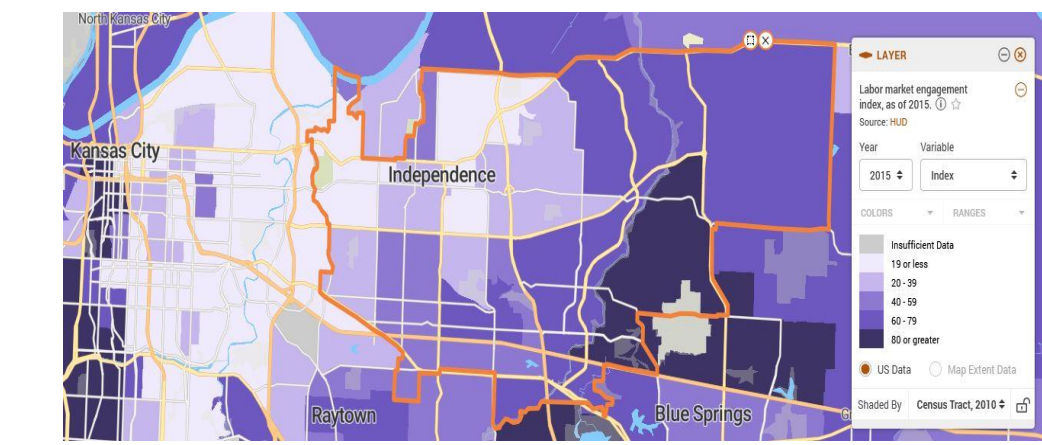


Employment Assessment

The HUD jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a CBSA (aka metro area), with larger employment centers weighted more heavily. Drawn from the MARC study noted earlier, “the population center of Independence has access to 22 percent of the region’s jobs within a 10-mile radius. Both Independence and Blue Springs are relatively job-poor. In each city, nearly 11,000 or more residents leave to work elsewhere in the region than there are people working within their city.” Note the HUD jobs proximity index below. Some central and western portions of Independence hold higher indices.

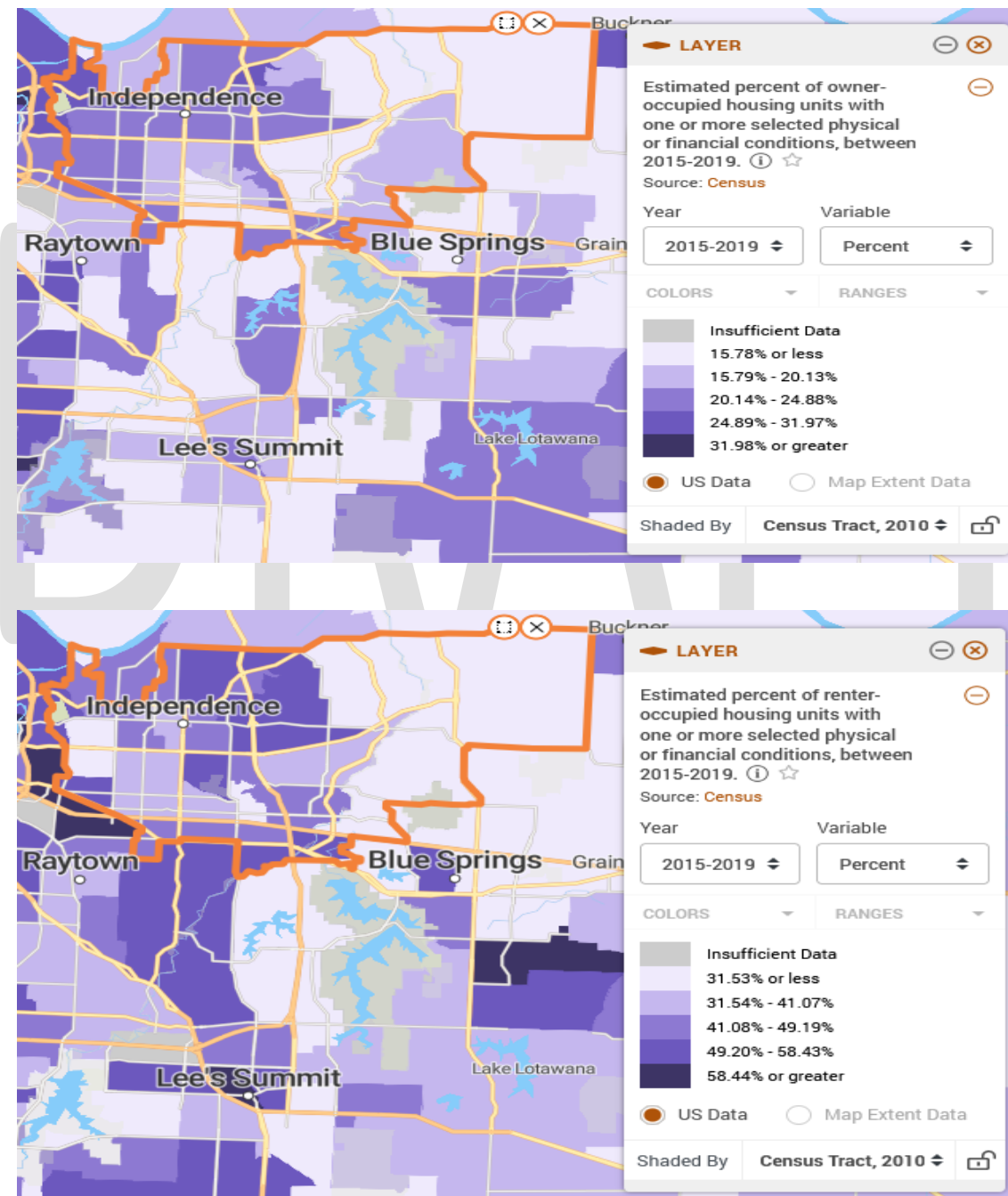


The HUD Labor-Market Engagement Index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. The highest levels of the labor market engagement index were evident in the southeast portions of the locality and the lowest in the central and western portions.



Housing (Distress) Assessment

Housing distress for both owners and renters is presented by the incidence of problems defined as households paying more than 30% of their income for housing and/or lacking plumbing and/or lacking kitchen facilities and/or containing more than 1.01 persons/room (overcrowded). The location of such problems are consistent with other relevant demographic indices and indices of distress evident in the central and western portions of the jurisdiction.



Information compiled for Independence produced the following general findings covering housing distress (aka households with problems) for the period covering 2013-2017:

Households By Income Bracket	Owner Households	Renter Households	Total Households
Total Households	29,440	18,755	48,195
Household Income <= 30% HAMFI	2,580	5,500	8,080
Household Income >30% to <=50% HAMFI	3,715	3,735	7,450
Household Income >50% to <=80% HAMFI	6,410	4,300	10,710
Household Income >80% to <=100% HAMFI	4,000	2,195	6,195
Household Income >100% HAMFI	12,740	3,020	15,760
Total Household Distress Having One Of Four Problems By Income 1/			
Household Income <= 30% HAMFI	1,990	4,120	6,110
Household Income >30% to <=50% HAMFI	1,560	2,520	4,080
Household Income >50% to <=80% HAMFI	1,585	1,100	2,685
Household Income >80% to <=100% HAMFI	420	110	530
Household Income >100% HAMFI	435	130	565
Total 2/	5,990	7,985	13,975
Percentage Of Total Household Distress Having One Of Four Problems By Income 1/			
Household Income <= 30% HAMFI	6.8%	22.0%	12.7%
Household Income >30% to <=50% HAMFI	5.3%	13.4%	8.5%
Household Income >50% to <=80% HAMFI	5.4%	5.9%	5.6%
Household Income >80% to <=100% HAMFI	1.4%	0.6%	1.1%
Household Income >100% HAMFI	1.5%	0.7%	1.2%
Total 2/	20.3%	42.6%	29.0%

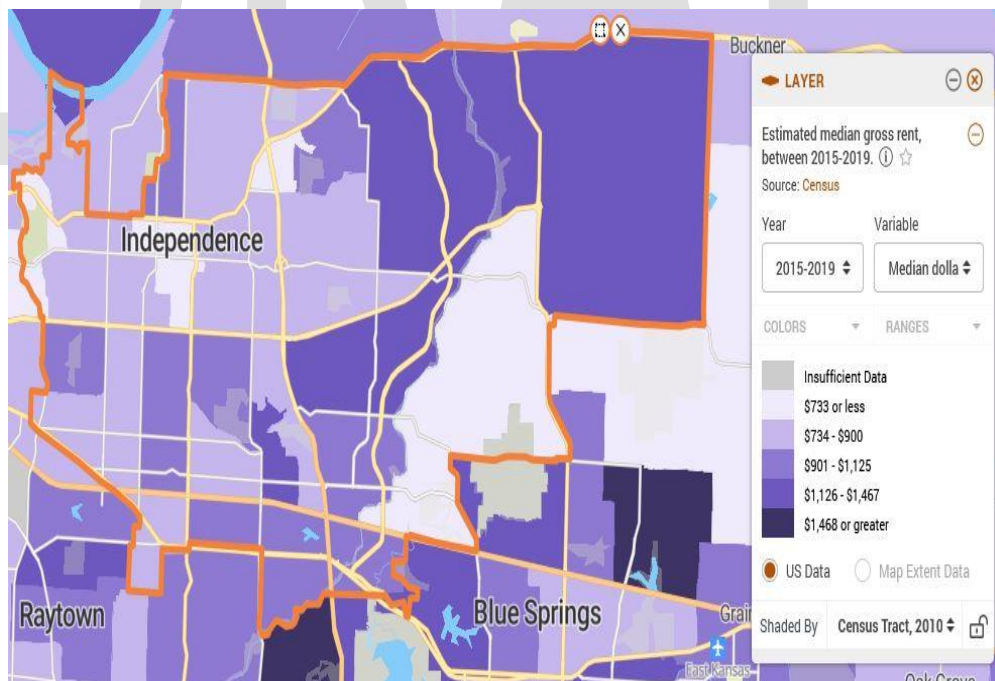
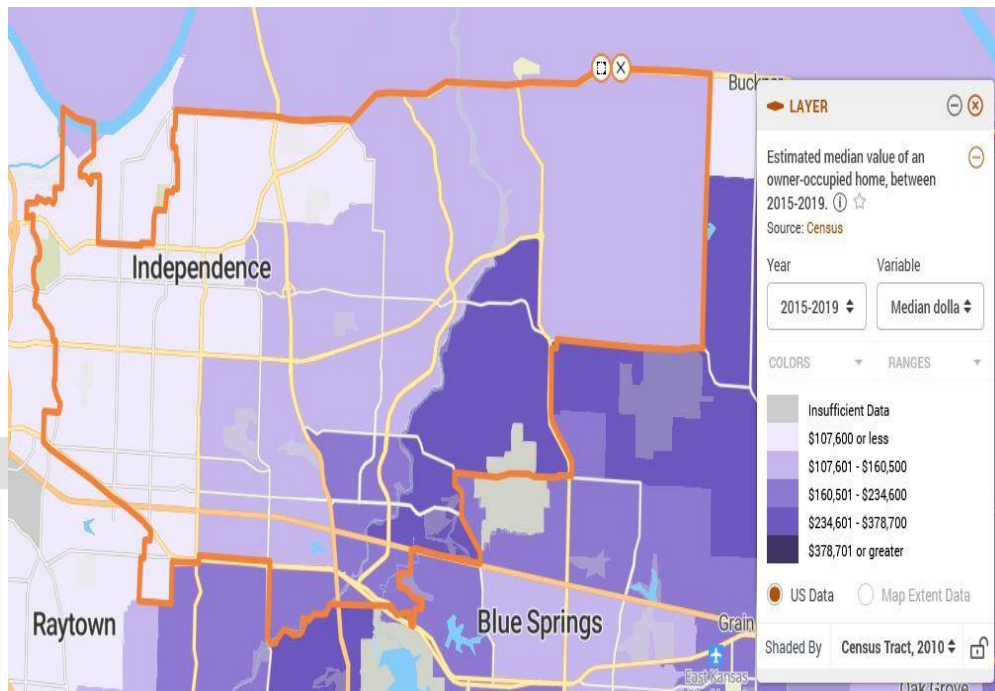
Source: U.S. Dept. of HUD CHAS data derived from special census runs, 2013-2017.

- 1) One of four problems include paying more than 30% of income for housing and/or unit lacks plumbing and/or unit lacks kitchen facilities and/or unit contains more than 1.01 person per room (overcrowded).
2/ Excludes units/households where cost burden not available and no other problems.

Regardless of ethnicity in Independence, note the following:

- ✓ 6,110 or 76% of households earning less than 30% of the area median (very low income) had problems;
- ✓ 4,080 households or 55% earning from 31 to 50% of the area median (low income) had problems;
- ✓ 2,685 households or 25% earning from 51 to 80% of the median (median income households) had housing problems of some sort.
- ✓ Overall, about 30% of Independence households (13,975) had housing problems;
- ✓ About 20% of owner households (5,990) had problems; and
- ✓ A very sizable 42% of renter households (7,985) had problems.

The distribution of home valuations and rent levels in Independence reinforce where those households with problems are situated as indicated below.

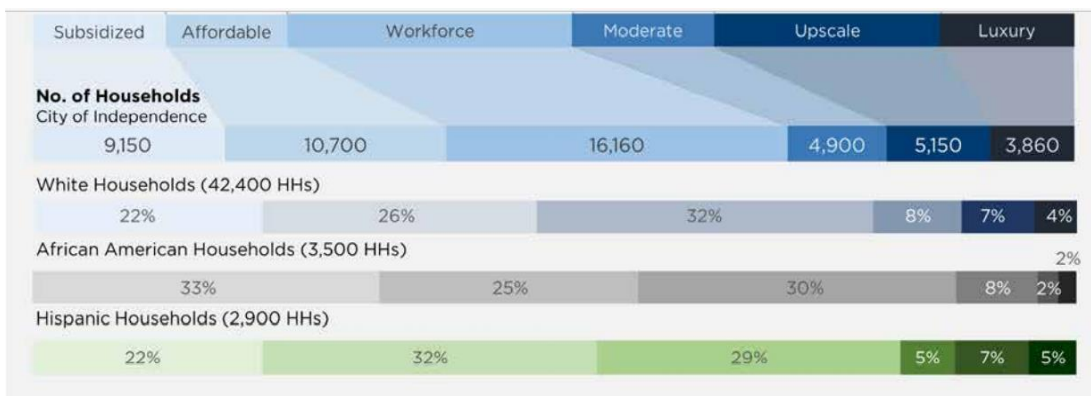


Drawn from the MARC study in 2016, the following table indicates the incidence of households and persons securing governmental housing support compared with their

proportion of the total Independence population. While African Americans were securing resources beyond their percentage composition of the total and lower-income population of Independence, Hispanics were generally not.

	Independence			Lee's Summit			Blue Springs		
		Variance 10+ pts.			Variance 10+ pts.			Variance 10+ pts.	
	Total pop.	0-30% AMI pop.		Total pop.	0-30% AMI pop.		Total pop.	0-30% AMI pop.	
<i>Compare percent white in assisted housing to percent white in population total and percent white population with income less than 30% of AMI</i>									
Percent non-Hispanic white									
Of population total	82%			84%			85%		
Of population with income 0-30% AMI	80%			80%			85%		
Public Housing	74%			98%	+	+			
Section 8 Project-Based	67%	—	—	67%	—	—	93%		
Other HUD Multifamily	92%		+						
Housing Choice Vouchers	54%	—	—	42%	—	—	45%	—	—
<i>Compare percent black in assisted housing to percent black in population total and percent black population with income less than 30% of AMI</i>									
Percent non-Hispanic black									
Of population total	5%			8%			6%		
Of population with income 0-30% AMI	9%			16%			3%		
Public Housing	20%	+	+	2%		—			
Section 8 Project-Based	21%	+	+	11%			4%		
Other HUD Multifamily	3%					—			
Housing Choice Vouchers	41%	+	+	56%	+	+	55%	+	+
<i>Compare percent Hispanic in assisted housing to percent Hispanic in population total and percent Hispanic population with income less than 30% of AMI</i>									
Percent Hispanic									
Of population total	8%			4%			5%		
Of population with income 0-30% AMI	9%			2%			8%		
Public Housing	3%			0%					
Section 8 Project-Based	9%			2%			2%		
Other HUD Multifamily	2%								
Housing Choice Vouchers	3%			1%			0%		

Drawn from the Independence Housing Study in 2022, note the following distribution of housing being provided by race/ethnicity.



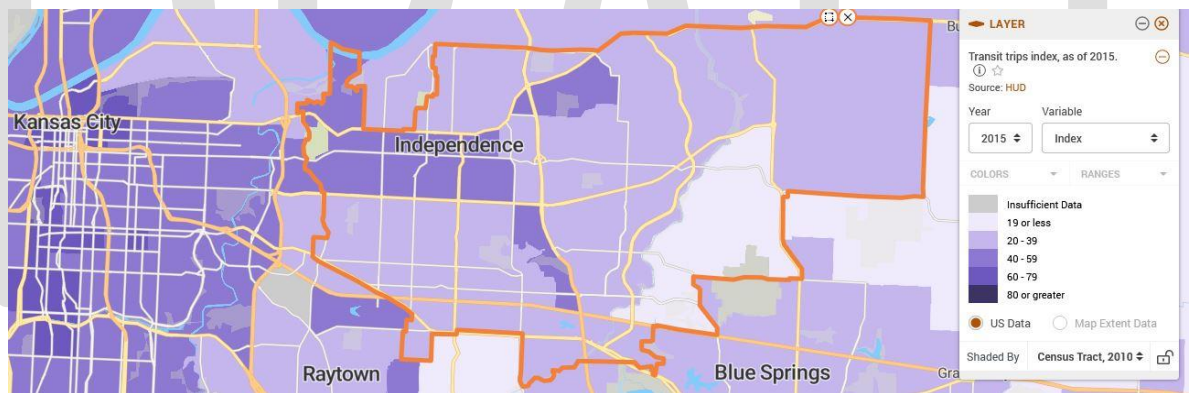
Source: Income Limits 2021 - HUD, ESRI 2021, ACS 2019, Development Strategies 2021

The housing assessment conducted herein reinforce local and regional issues identified in the 2016 MARC study. Independence will continue to assess the following items in addition to others:

- ✓ Admissions and occupancy policies and procedures, including preferences in its publicly supported housing
- ✓ The ongoing quality of its affordable housing information programs
- ✓ Opportunities to preclude landlords from discriminating against HCV households attempting to use vouchers as a source of payment for rent.
- ✓ Foster land use and zoning laws conducive to affordable housing
- ✓ Mitigate community opposition to affordable housing
- ✓ Continue to foster convenient and affordable public transit options for poor households who are transit dependent.
- ✓ Foster public investment in targeted neighborhoods, including services and amenities
- ✓ Continue to foster siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs

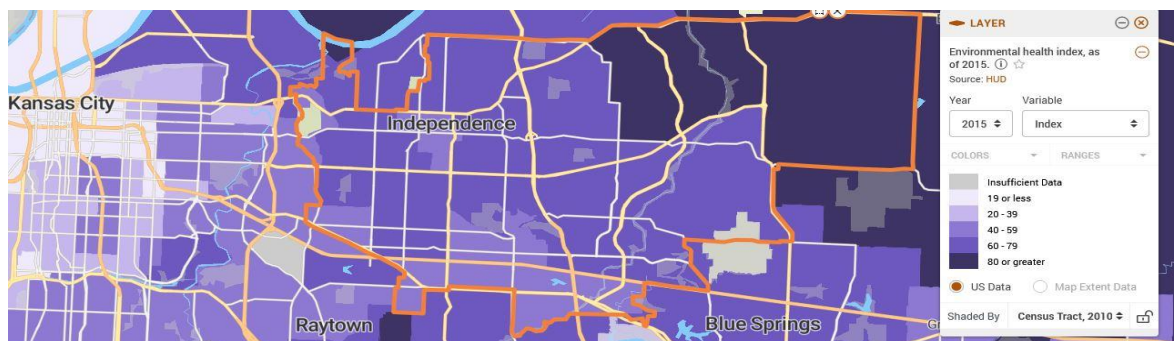
Transportation Assessment

The HUD Low Transportation Cost Index is based on estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters in the region (i.e. metro area). The central part of the community appears the most impacted here. Also note the transportation trips index (commuter related).



Environmental Health Hazard Exposure Assessment

The HUD Environmental Health Hazard Exposure Index summarizes potential exposure to harmful toxins at a neighborhood level. The northern and central portions of Independence appear less affected than the northeast quadrant of the locality.



Home Lending From HMDA Assessment

Information derived from HMDA was analyzed relative to lending patterns evident in Independence as of late (2017). More recent information was sought but none available by tract.

Generally speaking, when the incidence of loan denials for new FHA/VA and conventional loans in 2017 were compared with the incidence of minorities by census tract in 2019, no correlations were evident. For refinancing and home improvement loan denials, no coherent correlations were also apparent. Realize refinancing and home improvement origination loan data appeared somewhat questionable.

HOME MORTGAGE DISCLOSURE ACT (HMDA) LOAN ACTIVITY, 2017
LOAN APPLICATIONS AND DENIALS
BY CENSUS TRACT IN INDEPENDENCE
COMPARED WITH MINORITY INCIDENCE IN 2019

Independence Census Tract (2010 Tracts)	FHA Loans Originated	FHA Loans Denied	Percent Denied	Conventional Loans Originated	Conventional Loans Denied	Percent Denied	Refinancing Loans Originated	Refinancing Loans Denied	Percent Denied	HOME Improvement Loans Originated	HOME Improvement Loans Denied	Percent Denied	Percent Minority (In 2019)	Tracts W More % Minorities Than The % City In 2019
Census Tract 110	21	4	16%	19	2	10%	9	15	63%	4	2	33%	28.5%	Yes
Census Tract 112	26	6	19%	15	2	12%	17	12	41%	1		0%	32.6%	Yes
Census Tract 113	32	10	24%	18	4	18%	32	23	42%	3	3	50%	18.6%	No
Census Tract 114.01	69	9	12%	97	9	8%	94	44	32%	8	7	47%	23.1%	No
Census Tract 114.05	13	1	7%	10	1	9%	9	8	47%	1	1	50%	44.1%	Yes
Census Tract 114.06	51	7	12%	24	3	11%	22	18	45%	5	3	38%	20.6%	No
Census Tract 115	30	9	23%	24	3	11%	22	18	45%	5	3	38%	37.4%	Yes
Census Tract 116	20	4	17%	19	4	17%	21	11	34%	1	3	75%	16.4%	No
Census Tract 117	6	1	14%	18	1	5%	22	10	31%	1	3	75%	33.7%	Yes
Census Tract 118	20	8	29%	30	1	3%	13	13	50%	1	3	75%	26.0%	Yes
Census Tract 119	29	4	12%	24	3	11%	38	12	24%	2	4	67%	28.5%	Yes
Census Tract 120	34	8	19%	22	8	27%	30	14	32%	2	3	60%	30.5%	Yes
Census Tract 121	36	6	14%	40	3	7%	52	26	33%	2	3	60%	31.7%	Yes
Census Tract 122	50	13	21%	42	10	19%	61	31	34%	4	11	73%	26.1%	Yes
Census Tract 123	27	2	7%	31		0%	39	29	43%	5	4	44%	7.4%	No
Census Tract 124	52	9	15%	33	3	8%	42	21	33%	12	6	33%	28.5%	Yes
Census Tract 145.01	28	4	13%	34	1	3%	48	20	29%	5	4	44%	16.9%	No
Census Tract 145.02	12		0%	35	7	17%	40	23	37%	6	6	50%	9.8%	No
Census Tract 146.01	50	6	11%	42	6	13%	54	38	41%	4		0%	17.2%	No
Census Tract 146.03	34	2	6%	28	1	3%	48	14	23%	9	4	31%	19.0%	No
Census Tract 147.01	18	6	25%	28	3	10%	40	8	17%	6		0%	21.4%	No
Census Tract 147.02	42	1	2%	33	1	3%	83	35	30%	8	6	43%	14.2%	No
Census Tract 148.04	16	0	0%	52	3	5%	67	15	18%	7	5	42%	13.4%	No
Census Tract 156	1		0%	5	1	17%	2	5	71%				56.6%	Yes
Census Tract 177	54	7	11%	52	12	19%	75	35	32%	11	2	15%	9.2%	No
Total	771	127	14%	775	92	11%	980	498	34%	113	86	43%		

Source: FFIEC, 2017, ACS 2019.

4.0 Evaluation of Jurisdiction's Current Fair Housing Legal Status

Prepared by the Mid-American Regional Council (MARC) in 2017, The Kansas City Regional Analysis Of Impediments To Fair Housing Choice Study indicated the following fair housing complaints filed with the HUD Region VII Fair Housing & Equal Opportunity Office (FH&EO) in the region from Oct 1, 2010 to Sept 30, 2015.

	Share of Study Area Complaints	Number of Complaints	Race	Disability	Gender	Family Status	Retaliation	Other
Kansas								
Johnson County	16%	88	23%	55%	1%	7%	1%	13%
Overland Park	4%	27	41%	52%	0	7%	0	0
Shawnee	1%	7	29%	57%	0	0	0	14%
Lenexa	2%	10	20%	50%	0	10%	20%	0
Wyandotte County	9%	54	52%	30%	11%	4%	0	4%
Leavenworth Co	2%	10	50%	20%	10%	0	10%	10%
City of Leavenworth	1%	7	43%	20%	14%	0	0	13%
Miami County	>1%	3	34%	33%	0	0	33%	0
Missouri								
City of Kansas City	49%	305	44%	30%	6%	10%	4%	5%
Cass County	3%	16	19%	44%	0	19%	0	18%
Clay County	8%	48	42%	40%	4%	21%	6%	6%
Kansas City (part)	4%	23	35%	39%	9%	4%	9%	9%
Jackson County	61%	382	43%	30%	5%	13%	4%	5%
Independence	10%	55	26%	47%	5%	14%	2%	2%
Blue Springs	2%	8	42%	17%	0	8%	0	0
Lee's Summit	2%	21	76%	14%	0	5%	0	5%
Kansas City (part)	43%	270	43%	29%	4%	10%	4%	6%
Platte County	3%	18	39%	33%	11%	11%	6%	5%
Kansas City (part)	2%	12	50%	25%	8%	8%	8%	8%
Ray County	1%	4	25%	75%	0	0	0	0
Kansas City Metro	100%	623	40%	35%	5%	10%	3%	6%

Source: HUD Kansas City, Kan., Regional Office of Fair Housing and Equal Opportunity

Noted above, annual averages (2010 to 2015) of approximately 11 complaints were filed with HUD for the following reasons. No trends of any consequence appear evident from the data with the exception of the significant incidence of disability.

- ✓ Disability at 47% of the total;
- ✓ Race at 26%;
- ✓ Familial status at 14%; and,
- ✓ Gender, retaliation and other from 2.0 to 5% each.

Drawn from the 2017 MARC Fair Housing Study, "Note that in April 2015, the HUD Office of Fair Housing & Equal Opportunity (FH&EO) reached two Voluntary Compliance Agreements (VCAs) with the Housing Authority of Independence (HAI), Missouri, resolving HUD findings which showed that the agency failed to provide persons with disabilities and individuals with limited English proficiency meaningful access to its HUD-funded housing programs. HAI owns and operates 522 public housing units and administers more than 1,600 Housing Choice Vouchers. The two agreements are the result of a HUD compliance review of the housing authority's operations, which found that the agency was not fulfilling its obligation to provide access to services for persons with disabilities and individuals with limited English proficiency, as required by Section

504 of the Rehabilitation Act of 1973 and Title VI of the Civil Rights Act of 1964.”
[http://portal.hud.gov/hudportal/HUD?src=/press/press_releases_media_advisories/2015/HUD No 15-042](http://portal.hud.gov/hudportal/HUD?src=/press/press_releases_media_advisories/2015/HUD_No_15-042)

Contact was made with the HUD Regional FH&EO Office and the State Of Missouri Department of Labor Commission On Human Rights (MCHR) in October of 2021 to collect information on the number, type and disposition of fair housing complaints evident from Independence from 2016 to date. The US Department of Housing and Urban Development Region VII FH&EO Office all information on the complaints filed. MCHR was contacted in 10/'21 and indicated they were getting a new computer system and referred us to HUD FHEO Region VII. In addition, per HUD FHEO, Missouri state law changed around 2016/'17 and any complaints filed with them related to state statute that is not equivalent with federal law. Thus, of the 34 total complaints filed, the largest category by far was for disability (21) with the second being race (11). From information contained within the prior AI prepared by MARC, HUD brought compliance reviews with the City of Independence Housing Authority (HAI). Per MARC, “HAI owns and operates 522 public housing units and administers more than 1,600 Housing Choice Vouchers. The two agreements (reached with the HAI) are the result of a HUD compliance review of the housing authority's operations, which found that the agency was not fulfilling its obligation to provide access to services for persons with disabilities and individuals with limited English proficiency, as required by Section 504 of the Rehabilitation Act of 1973 and Title VI of the Civil Rights Act of 1964.

Filed Cases in Independence, MO b/w Jan. 2016 and Nov. 3, 2021

Bases	Metrics CY Filed HUD/ FHAP	Number of Filed Cases														
		2016		2017		2018		2019		2020		2021		Total		
		FHAP	Total	HUD	FHAP	Total	HUD	Total	HUD	Total	HUD	Total	HUD	Total		
Race		2	2				2	2	2	2	3	3	2	2	11	
Color		1	1												1	
National Origin		3	3										1	1	4	
Sex									2	2			1	1	3	
Disability		7	7	1	3	4	1	1	3	3	4	4	2	2	21	
Familial Status											1	1			1	
Retaliation		1	1						1	1					2	
Total		11	11	1	3	4	3	3	7	7	4	4	5	5	34	

Note: The numbers don't add up since persons filing complaints may fall (and do) in more than one of the categories mentioned.

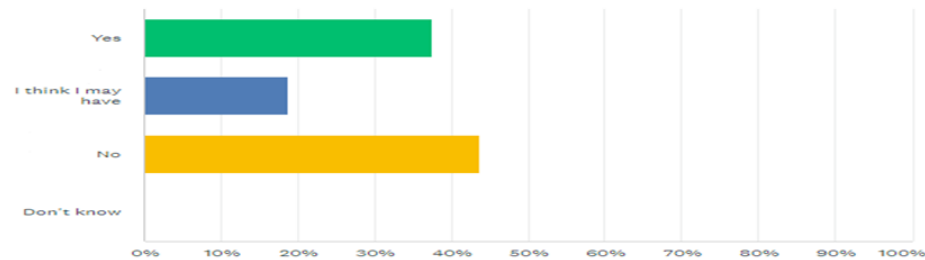
The resolution of the cases filed with HUD Region VII FHEO from January of 2016 to date (November, 2021) are noted below. This information was also provided by HUD FHEO.

Violation City	HUD/ FHAP	Bases	Issues	Closure Date	Closure Reason
Independence	HUD	Disability	Discrimination in terms/conditions/privileges relating to rental	05/01/19	Conciliation/settlement successful
Independence	HUD	Disability	Discrimination in terms/conditions/privileges relating to rental	11/06/20	Conciliation/settlement successful
Independence	HUD	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	08/25/17	Conciliation/settlement successful
Independence	HUD	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	12/06/18	Conciliation/settlement successful
Independence	HUD	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	11/04/19	No cause determination
Independence	HUD	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to permit reasonable modification	12/31/19	Conciliation/settlement successful
Independence	HUD	National Origin	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	08/26/21	Complaint withdrawn by complainant without resolution
Independence	HUD	Race	Discrimination in terms/conditions/privileges relating to rental	05/01/19	Conciliation/settlement successful

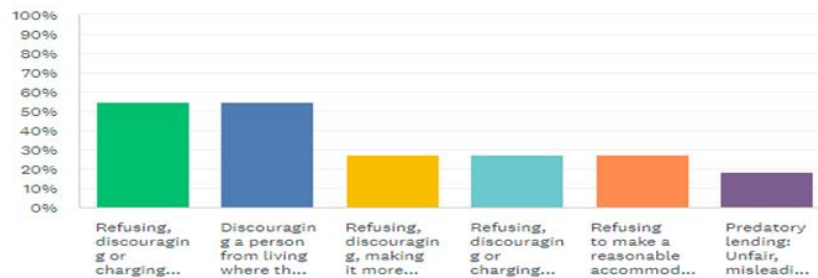
Independence	HUD	Sex	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	09/09/20	No cause determination
Independence	FHAP	Color, National Origin	Discriminatory refusal to rent	03/16/17	No cause determination
Independence	FHAP	Disability	Discrimination in terms/conditions/privileges relating to rental	12/13/16	No cause determination
Independence	FHAP	Disability	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental	09/19/16	Complainant failed to cooperate
Independence	FHAP	Disability	Discriminatory refusal to negotiate for rental; Failure to make reasonable accommodation	04/24/17	Conciliation/settlement successful
Independence	FHAP	Disability	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	04/05/17	Conciliation/settlement successful
Independence	FHAP	Disability	Discriminatory terms, conditions, privileges, or services and facilities	06/29/16	Dismissed for lack of jurisdiction
Independence	FHAP	Disability	Discriminatory terms, conditions, privileges, or services and facilities	12/21/17	Complaint withdrawn by complainant after resolution
Independence	FHAP	Disability	Failure to make reasonable accommodation	01/14/16	No cause determination
Independence	HUD	Race	Discrimination in terms/conditions/privileges relating to rental	08/18/20	No cause determination
Independence	HUD	Race	Discrimination in terms/conditions/privileges relating to rental	07/15/21	Conciliation/settlement successful
Independence	HUD	Race	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	06/19/18	Complainant failed to cooperate
Independence	HUD	Race	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	12/31/19	Conciliation/settlement successful
Independence	HUD	Race, Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	08/07/20	Complaint withdrawn by complainant after resolution
Independence	HUD	Race, Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to permit reasonable modification	03/12/21	Conciliation/settlement successful
Independence	HUD	Race, Disability, Familial Status	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	06/02/21	No cause determination
Independence	HUD	Race, Sex	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	03/26/21	Complaint withdrawn by complainant after resolution
Independence	FHAP	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to permit reasonable modification; Failure to make reasonable accommodation	06/14/16	No cause determination
Independence	FHAP	National Origin	Discrimination in terms/conditions/privileges relating to rental	06/29/16	Complaint withdrawn by complainant after resolution
Independence	FHAP	National Origin	Discrimination in terms/conditions/privileges relating to rental	06/05/17	No cause determination
Independence	FHAP	Race	Discrimination in terms/conditions/privileges relating to rental	01/20/17	No cause determination
Independence	FHAP	Race, Disability	Discriminatory refusal to rent and negotiate for rental	01/20/17	No cause determination

An online fair housing survey was conducted in the Fall/Winter of 2021 and '22 attempting to secure insight into the incidence of fair housing problems in Independence. The survey was generated in both English and Spanish and distributed to the public by city staff. Survey results follow.

Have you ever encountered any of these aforementioned forms of discrimination or known someone who has?



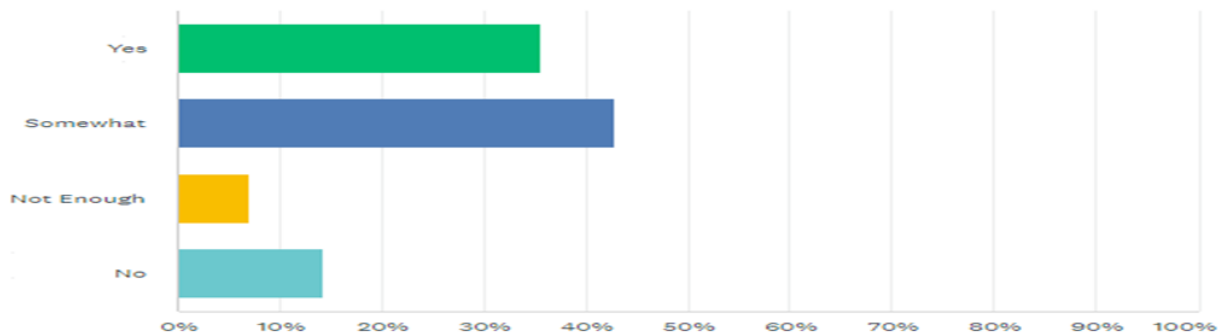
If you believe or think that you or someone you know encountered illegal discrimination please note the reasons below.



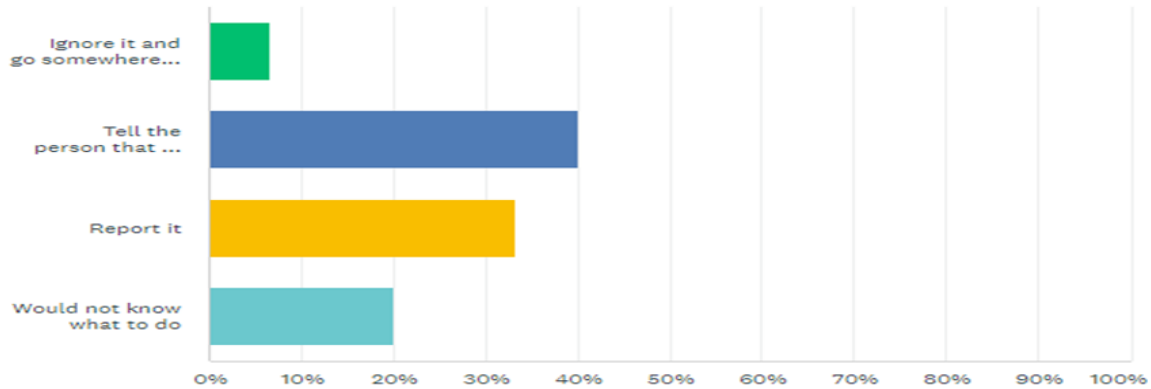
ANSWER CHOICES

- ▼ Refusing, discouraging or charging more to rent an apartment or buy a home.
- ▼ Discouraging a person from living where they want to live. Steering them to another apartment, complex or neighborhood.
- ▼ Refusing, discouraging, making it more difficult or charging more or providing less favorable terms on a home loan to buy, refinance, fix up or use the equity in a home.
- ▼ Refusing, discouraging or charging more for home insurance.
- ▼ Refusing to make a reasonable accommodation or allowing a modifications to make an apartment more accessible for person with a disability.
- ▼ Predatory lending: Unfair, misleading and deceptive loan practices including loan modification.

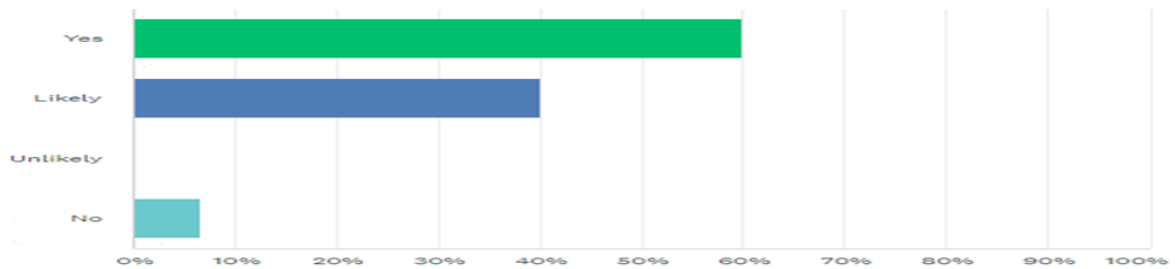
Do you feel you are well informed on Housing Discrimination?



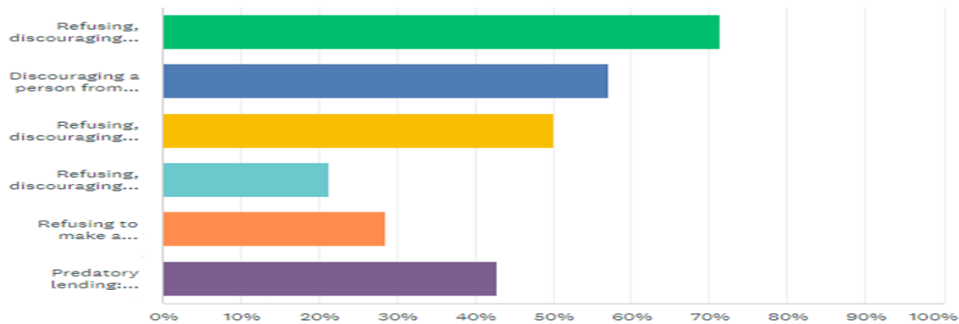
What would you do if you encountered housing discrimination?



Do you believe Housing Discrimination occurs in Independence?



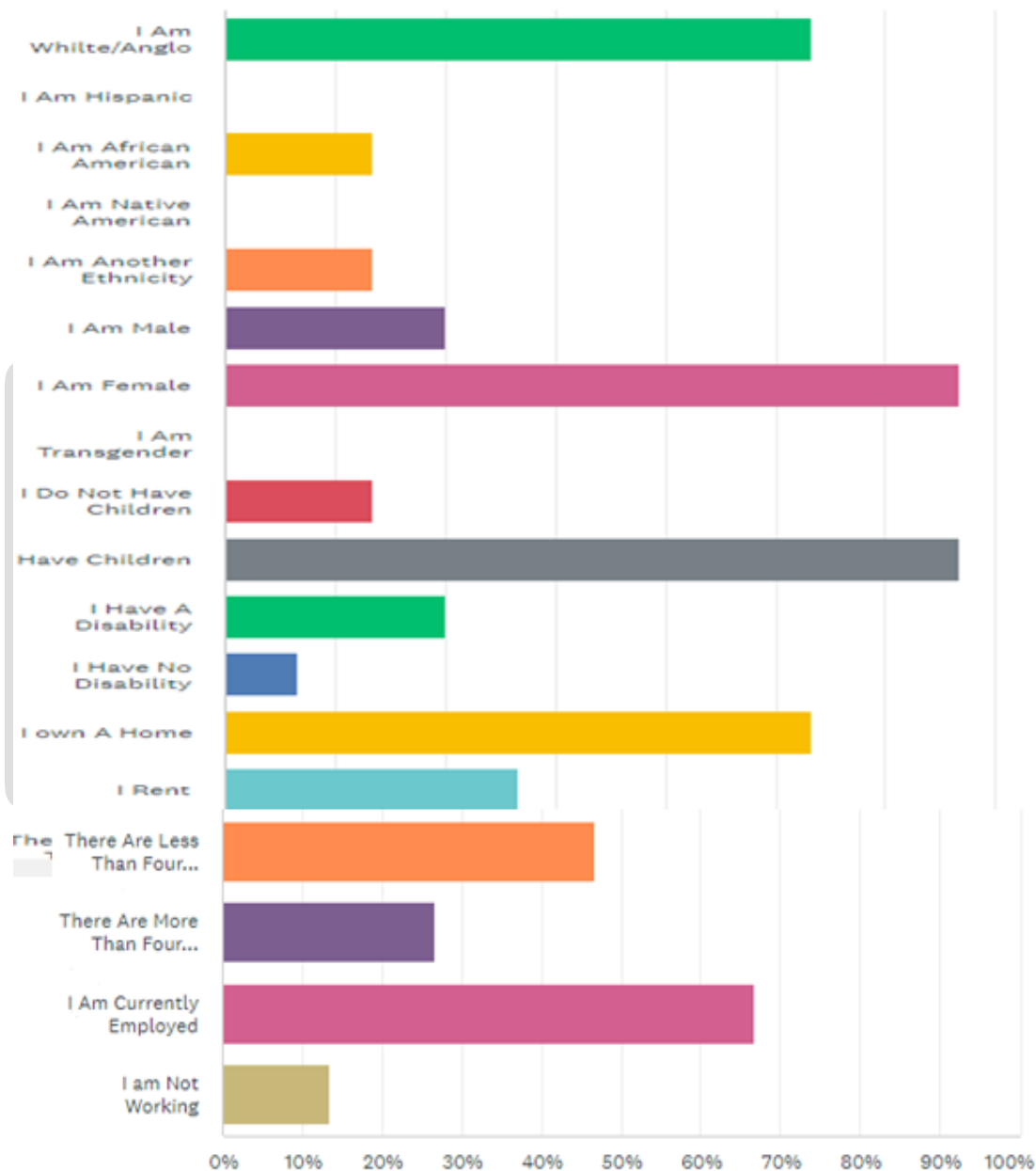
If you think housing discrimination is occurring, what types of discrimination do you think are the largest problems



ANSWER CHOICES

- ▼ Refusing, discouraging or charging more to rent an apartment or buy a home.
- ▼ Discouraging a person from living where they want to live. Steering them to another apartment, complex or neighborhood.
- ▼ Refusing, discouraging, making it more difficult or charging more or providing less favorable terms on a home loan to buy, refinance, fix up or use the equity in a home.
- ▼ Refusing, discouraging or charging more for home insurance
- ▼ Refusing to make a reasonable accommodation or allowing a modifications to make an apartment more accessible for person with a disability.
- ▼ Predatory lending: Unfair, misleading and deceptive loan practices including loan modification.

Please check all that apply to you. Thanks.



**CITY OF INDEPENDENCE FAIR HOUSING DIVISION
ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE, 2021
November 8, 2021 Community Input Meeting Notes**

FY 2022-2026 Analysis Of Impediments To Fair Housing Choice Findings

Overall Top Fair Housing Needs/Priorities – People really don't understand what their rights are. Education of both tenants and landlords is key.

Incidence of Fair Housing Discrimination Experienced

<i>Are you aware of any housing discrimination that occurs? If so, what kind?</i>	<i>What are some of the things that can be done to overcome discrimination?</i>
<ul style="list-style-type: none">• Not rent or sale to certain racial demographics• Not rent to individuals with children• Not rent to someone that has a disability	<ul style="list-style-type: none">• Housing authorities are required to review the 4 Factor Analysis of the Safe Harbor Rule by HUD that looks at the top used languages in the area that we serve and provide documents in those languages or interpreters. It is the LEP policy – Limited English Proficiency.• I think the City needs to coordinate with the County and work together on the Fair Housing topic. We all love the new term AFFH.

Housing Market/Supply Conditions Affecting Housing Choice

<i>Is there an adequate supply of livable ownership and rental housing for residents regardless of their income? If not, what is needed?</i>
<ul style="list-style-type: none">• There is not an adequate of supply of affordable rentals. I think we need to expand in all areas, owner, rental, we need homes that are under \$125,000 for low-income individuals to be able to purchase. Section 8 vouchers can be used to assist in payment of mortgages for Homeownership programs.• The supply of affordable housing that is adequate and meets housing standards needs to be expanded. I feel there are stereotypes and misinformation about low-income housing units and a desire to not have them built as they will impact "resale value" or overall value of a neighborhood.

Supply of Housing for Persons with Disabilities

<i>Is there an adequate supply of housing that is accessible to people with disabilities? If not, what is needed?</i>
<ul style="list-style-type: none">• I don't specifically have housing for disabled but I do have preferences on our application for Elderly and for people with disabilities to help get them into housing quicker. I only have 528 units with a waiting list of 4,000 – we need more affordable units.

Neighborhood Resident Access to Public Amenities

Are public resources (e.g. parks, schools, roads, police and fire services, etc.) invested equitably throughout neighborhoods? If not, what is needed and where?

- Transit services have decreased their service areas and need to expand and not decrease.
- Infrastructure needs attention in certain areas of the City.
- Police response in certain areas of the City.
- I would agree that certain areas of the City need more attention/repair than others. Expand public transit options and availability.
- We need more retail, businesses in certain areas of the city. Maybe incentives to bring those businesses in to provide jobs close to the low-income developments. Then transportation would not be an issue. Parts of the City that are blighted with manufacturing buildings or warehouses, businesses, houses that are abandoned.

Fair Housing Resources and Mitigation

What type of fair housing services (education, complaint investigation, testing) are in the area?

- Fair housing complaints go to the HUD KC Field Office in KC, KS.
- Our direct service providers in our housing programs educate clients on their housing rights and landlords are given info on VAWA housing rights for tenants. If a client feels they are experiencing an issue and want to file a complaint, they are assisted by their advocate or case manager.

Other Issues

Are there other issues or recommendations related to our discussion you would like to raise?

- We issue all applicants with Violence Against Women Act (VAWA) housing rights as well as our current tenants at their Annual Re-examination for Continued Services. They sign a form showing they received the information. We also hand out Fair Housing Materials and flyers for both Public Housing and Section 8. We do a Fair Housing Training once a year for all employees.

5.0 Identification of Public Impediments to Fair Housing Choice

A variety of efforts were undertaken to assess the public sector in the City of Independence with respect to zoning and site selection. Consistent with past FHEO suggestions, the following HUD adopted survey was provided to officials of the City of Independence Planning and Development Services functions years back regarding zoning, building codes and accessibility issues. In 2021, the City of Independence commissioned its AI and the city zoning ordinance, building codes and public policies were examined to reveal any public policies and ordinances that impede fair housing. No concerns were noted then as a result.

FAIR HOUSING IMPEDIMENT STUDY Review of Public Policies and Practices (Zoning and Planning Codes)

Name of Jurisdiction:	City of Independence, MO
Reviewing Agency:	Community Development Department
Reviewer:	Tom Scannell
Date:	October 12, 2021

The Fair Housing Impediments Study reviews the Zoning and Planning Code and identifies land use and zoning regulations, practices and procedures that act as barriers to the development, the site and the use of housing for individuals with disabilities. The Study analyzes the Code and other documents related to land use and zoning decision-making provided by the participating jurisdiction. Additional information should be provided through interviews with Planning and Building and Safety Department staff and non-profit developers of special needs housing. In identifying impediments to housing for individuals with disabilities, the Study should distinguish between *regulatory* impediments based on specific Code provisions and *practice* impediments, which describe practices by the jurisdiction.

- Zoning Regulation Impediment: Does the Code definition of “family” have the effect of discriminating against unrelated individuals with disabilities who reside together in a congregate or group living arrangement? Yes ☐ No ☒
- Zoning Regulation Impediment: Does the Code definition of “disability” the same as the Fair Housing Act? Yes ☒ No ☐
- Practice Impediment: Are personal characteristics of the residents considered? Yes ☐ No ☒
- Practice Impediment: Does the zoning ordinance restrict housing opportunities for individuals with disabilities and mischaracterize such housing as a “boarding or rooming house” or “hotel”? Yes ☐ No ☒
- Practice Impediment: Does the zoning ordinance deny housing opportunities for disability individuals with on site housing supporting services? Yes ☐ No ☒
- Does the jurisdiction policy allow any number of unrelated persons to reside together, but restrict such occupancy, if the residents are disabled? Yes ☐ No ☒
- Does the jurisdiction policy not allow disabled persons to make reasonable modifications or provide reasonable accommodation for disabled people who live in municipal-supplied or managed residential housing? Yes ☐ No ☒

- Does the jurisdiction require a public hearing to obtain public input for specific exceptions to zoning and land-use rules for disabled applicants and is the hearing only for disabled applicants rather than for all applicants? Yes ☐ No ☒

- Does the zoning ordinance address mixed uses? Yes ☒ No ☐
 - a. How are the residential land uses discussed?

The City's PUD district discusses them as housing. See attached 14-902.
 - b. What standards apply?

The applicant can apply the base zoning or create/modify the standards that will apply to the development. See 14-902

- Does the zoning ordinance describe any areas in this jurisdiction as exclusive? Yes ☐ No ☒ Are there exclusions or discussions of limiting housing to any of the following groups? No ☒ If yes, check all of the following that apply:

Race ☐ Color ☐ Sex ☐ Religion ☐ Age ☐ Disability ☐
 Marital or Familial Status ☐ Creed of National Origin ☐

- Are there any restrictions for Senior Housing in the zoning ordinance? Yes ☐ No ☒ If yes, do the restrictions comply with Federal law on housing for older persons (i.e., solely occupied by persons 62 years of age or older or at least one person 55 years of age and has significant facilities or services to meet the physical or social needs of older people)? Yes ☐ No ☐ If No, explain:

- Does the zoning ordinance contain any special provisions for making housing accessible to persons with disabilities? Yes ☐ No ☒

- Does the zoning ordinance establish occupancy standards or maximum occupancy limits? Yes ☐ No ☒ Do the restrictions exceed those imposed by state law? Yes ☐ No ☐ N/A ☒

- Does the zoning ordinance include a discussion of fair housing? Yes ☐ No ☒ If yes, how does the jurisdiction propose to further fair housing?

- Describe the minimum standards and amenities required by the ordinance for a multiple family project with respect to handicap parking.
Must be designed to UFAS standards, requires a minimum number of accessible spaces and dimensions, location of spaces, signs and markings and ramps. See 14-501-11.
- Does the zoning code distinguishes senior citizen housing from other single family residential and multifamily residential uses by the application of a conditional use permit (cup).? Yes ☐ No ☒ XXX
- Does the zoning code distinguishes handicapped housing from other single family residential and multifamily residential uses by the application of a conditional use permit (cup).? Yes ☐ No ☒ XXX
- How are “special group residential housing” defined in the jurisdiction zoning code?
The City follows the State of Missouri requirement regarding group homes. See 14-200-02-A
- Does the jurisdiction’s planning and building codes presently make specific reference to the accessibility requirements contained in the 1988 amendment to the Fair Housing Act? Yes ☒ No ☐ . Is there any provision for monitoring compliance? Yes ☒ No ☐

Noted below are the definitions of family and disabled from the city’s Unified Development Ordinance (UDO) (relevant to first two survey questions on page 32).

14-201-01 General terms

Unless otherwise noted, the following words and terms shall apply to this chapter.

DISABILITY, PERSON WITH. A person who has a condition of physical or mental disability that substantially limits one or more major life activities, as stated in Section 504 of the Federal Rehabilitation Act of 1973.

FAMILY. The following living arrangements shall constitute a family for the purposes of this chapter:

- One or more persons related by blood, marriage, legal adoption or custodial relationship living as a single housekeeping unit; or,
- Not more than three unrelated persons, all of whom live together in a dwelling unit; or,
- Two unrelated persons, plus their biological, adopted or foster children or other minors for whom they have legally established custodial responsibility, living as a single housekeeping unit.

With respect to items 4 through 7 on page 32 of the survey, the City of Independence follows the State of Missouri requirements regarding Group Homes that follow.

14-200-02 Residential use group

The residential use group includes uses that provide living accommodations to one or more persons. The group includes two use categories: group living and household living.

14-200-02-A.Group Living. Residential occupancy of a dwelling by other than a "family," typically providing communal kitchen/dining facilities. Examples of group living uses include but are not limited to fraternities, sororities, convents, monasteries, and the following specific use types:

1. **Group Home, Custodial.** A home for nine or more unrelated persons with mental and/or physical handicaps. Such homes may also be occupied by paid staff and caregivers.
2. **Group Home, Residential.** In accordance with ~~BSMO~~ 89.020.2. A single-family residence in which eight or fewer unrelated mentally or physically handicapped persons reside, along with up to two additional persons acting as houseparent's or guardians who need not be related to each other or to any of the mentally or physically handicapped persons, residing in the dwelling.
3. **Domestic Violence Residence.** A residential building in which temporary housing is provided for up to eight persons who are victims of domestic violence. Any children or support staff using sleeping accommodations at a domestic violence residence will be counted in determining maximum occupancy.
4. **Domestic Violence Shelter.** A building in which temporary housing is provided for more than eight persons who are victims of domestic violence.
5. **Substance Abuse Treatment House.** A residential building in which temporary housing is provided for up to 12 persons who are undergoing treatment for alcohol or other substance abuse. Any support staff using sleeping accommodations will be counted in determining maximum occupancy.
6. **Penal Halfway House.** A residential building in which temporary housing is provided for up to 12 persons who are on probation, on parole, or are participating in a penal institute's pre-release program. Any support staff using sleeping accommodations will be counted in determining maximum occupancy.
7. **Recovery Center.** A residential building in which temporary housing is provided for 13 to 50 persons who are either:
 - (a) undergoing treatment for alcohol or drug dependence
 - (b) on probation, on parole, or are participating in a penal institute's pre-release programAny support staff using sleeping accommodations will be counted in determining maximum occupancy. Facilities with more ~~that~~ 50 persons are considered detention/correction facilities, see Sections 14-200-04-C and 14-302-03 for further information.
8. **Nursing Home.** An extended or intermediate care facility licensed or approved to provide full-time convalescent or chronic care to individuals who, by reason of advanced age, chronic illness or infirmity, are unable to care for themselves. This term shall also include assisted living facilities.
9. **Homeless Shelter.** A facility providing temporary personal assistance on a nonprofit basis to individuals of an indigent status. Such assistance may include food and/or shelter and may, in addition, include religious instruction, counseling, and incidental services.
10. **Soup Kitchen.** An establishment where meals are provided to a person or persons unrelated to the provider at no cost or at a charge that is less than the full cost of providing same and that the provision of such meals is the principal service of the establishment, whether or not additional services are provided; however, lodging is prohibited. A soup kitchen is not a restaurant.

With respect to item 2 on page 33 of the survey, note the Planned Unit Development (PUD) section of the city's UDO. The PUD allows for mixed-unit developments.

14-902 /PUD, PLANNED UNIT DEVELOPMENT OVERLAY DISTRICT

14-902-01 Purpose

The /PUD, Planned Unit Development overlay district regulations are intended to:

14-902-01-A. Ensure development that is consistent with the comprehensive plan;

14-902-01-B. Ensure that development can be conveniently, efficiently and economically served by existing and planned utilities and services;

14-902-01-C. Allow design flexibility that results in greater public benefits than could be achieved using conventional zoning district regulations;

14-902-01-D. Preserve natural, historic and cultural resources; and

14-902-01-E. Promote attractive and functional residential, nonresidential and mixed-use developments that are compatible with surrounding areas.

14-902-02 Procedure

PUDs must be reviewed and approved in accordance with the procedures of Article 14-703.

14-902-03 Effect of other development ordinance standards

Except as expressly authorized by the regulations of this section and approved as part of a PUD plan (in accordance with the procedures of Section 14-703), all of the standards of this development ordinance apply to development within a PUD district.

14-902-04 Standards eligible for modification

Unless otherwise expressly approved by the City Council as part of the PUD approval process, PUDs are subject to all applicable standards of this development ordinance. The City Council is authorized to approve PUDs that deviate from strict compliance with specified standards if they determine that the resulting development provides a greater level of public benefit than would normally be expected for projects developed under conventional zoning district standards.

14-902-04-A. Allowed Uses. A list of uses to be allowed in a PUD must be approved as part of the PUD approval process. Regardless of the underlying zoning, the City Council may approve a mix of use types within a PUD as a means of accommodating mixed-use developments and developments with a range of housing and commercial options.

14-902-04-B. Lot Size. The minimum lot area and width size standards of the base zoning district may be reduced as part of the PUD approval, provided that lot sizes must be adequate to safely accommodate all proposed buildings and site features.

14-902-04-C. Residential Density. The maximum allowable residential density of the base zoning district may be increased by up to 30 percent if the City Council determines that such an increase is warranted to support the public benefit likely to result from the proposed development and such density increase can be supported by existing and planned public facilities and services.

14-902-04-D. Setbacks. The minimum setback standards of the base zoning district may be reduced as part of the PUD approval, provided that:

1. Buildings located along any PUD district boundary that is adjacent to an R zoning district must be set back a distance at least equal to the height of the proposed building or a depth equal to the setback requirement of the abutting R district, whichever is greater; and
2. All exterior walls of detached buildings within the PUD must be separated by a minimum distance of 10 feet.

14-902-04-E. Height. The City Council may allow an increase in allowable building heights if the City Council determines that such an increase is warranted to support the public benefit likely to result from the proposed development. No building height increases are allowed within 100 feet of the outer perimeter of the PUD.

14-902-04-F. Parking and Loading. Off-street parking and loading requirements may be reduced when the City Council determines that decreased requirements are in keeping with projected parking and loading demand of the PUD.

14-902-04-G. Streets. Alternatives to otherwise "standard" street cross-sections and designs may be approved when the City Council determines that such alternative designs would better the context of the proposed development while still providing a safe and efficient circulation system.

14-902-05 Additional requirements and standards

14-902-05-A. Unified Control. No application for a PUD will be accepted or approved unless all of the property included in the application is under unified ownership or a single entity's control.

14-902-05-B. Zoning Map. Approved PUDs must be identified on the zoning map by appending the map symbol "/PUD" as a suffix to the base zoning district classification, as in "R-4/PUD" or "C-1/PUD."

With respect to item 1 on page 34 of the survey, note the accessible parking section from the city's UDO that follows.

14-501-11 Accessible parking (for persons with disabilities)

14-501-11-A. Uniform Federal Accessibility Standards. Off-street parking areas must be designed and laid out to comply with the Uniform Federal Accessibility Standards (UFAS). In the event of conflict between the standards of this section (14-501-11) and the UFAS, the UFAS will govern.

14-501-11-B. Number of Spaces. A portion of the total number of required off-street parking spaces in each off-street parking area must be specifically designated, located, and reserved for use by persons with disabilities. The following table shows the minimum number of accessible spaces that must be provided. Parking spaces designed for persons with disabilities will be counted toward fulfilling off-street parking standards.

Total Parking Provided	Accessible Spaces Required
1—25	1
26—50	2
51—75	3
76—100	4
101—150	5
151—200	6
201—300	7
301—400	8
401—500	9
501—1,000	2% of total spaces
1,001+	20, plus 1 per 100 spaces over 1,000

14-501-11-C. Space Dimensions. All parking spaces reserved for persons with disabilities must comply with the parking space dimension standards of Section 14-501-12, provided that aisles must be provided immediately abutting such spaces, as follows:

1. **Car-Accessible Spaces.** Car-accessible parking spaces must abut an access aisle with a minimum width of five feet.
2. **Van-Accessible Spaces.** Van-accessible parking spaces must abut an access aisle with a minimum width of eight feet.

14-501-11-D. Location of Spaces. Required spaces for persons with disabilities must be located in close proximity to building entrances and be designed to permit occupants of vehicles to reach the building entrance on an unobstructed path.

14-501-11-E. Signs and Marking. Required spaces for persons with disabilities must be identified with signs and pavement markings identifying them as reserved for persons with disabilities. Signs must be posted directly in front of the parking space at a height of no less than 42 inches and no more than 72 inches above pavement level. Signs must include the international symbol of accessibility (in white on a blue background) and the words "Minimum \$50 to \$300 fine."

14-501-11-F. Ramps. Accessibility ramps shall be designed and constructed so as to be integrated into the sidewalk. Ramps shall not be located within or extend into an accessible aisle or any other portion of the parking lot.

With respect to item 5 on page 34 of the survey, note that the UDO doesn't make reference other than that in the accessible parking section. However, the City has adopted ANSI 2009 and chapter 11 of 2018 IBC states, "The provisions of the I codes are intended to meet or exceed the federal requirements in the federal accessibility requirements found in the Americans With Disabilities Act and Fair Housing Act".

6.0 Assessment of Current Public And Private Fair Housing Programs And Activities in Independence

Findings on Impediments to Fair Housing Choice

Evidence of Insufficient Income Is Causing Housing Distress And Impeding Fair Housing Choice

- ✓ The incidence of cost burden and other indices of housing distress faces approximately 12,875 households or 49% of the population in Independence earning less than 80% AMI (2017).
- ✓ About 12,705 owner households, or 43% of total households, are earning under 80% AMI and are cost burdened or face other indices of housing distress.
- ✓ Approximately 7,740 renter households, or 42% of total households, are earning under 80% AMI and are cost burdened or face other indices of housing distress.
- ✓ The incidence of cost burden and other indices of housing distress are most apparent in the central and western portions of Independence in 2019.
- ✓ The public distribution of Independence housing vouchers was assessed by MARC in 2016 and Hispanics were not receiving their fair share given their proportion of the city's total population (8.8%). Recent (2021) discussions with the Independence IHA indicated that presently the Section 8 rental assistance wait list consists of 8% Hispanics and 6% of actual beneficiaries (recipients). For public housing, Hispanics comprise 13% of the wait list and 7% of actual beneficiaries. Thus, Hispanics have substantively increased their proportion of securing assisted housing assistance in Independence. Proportionate allocations to Hispanics are encouraged going forward.

Evidence of Housing Discrimination

- ✓ About 60% of residents surveyed on housing discrimination believe that discrimination "is" or is "likely" occurring in Independence.
- ✓ A little less than 60% of those residents surveyed on housing discrimination feel they have been discriminated against or may have been.

Need for Community Education

- ✓ The community needs to be more informed. Only about 6 fair housing complaints were filed with HUD annually on average in Independence. More than half involve persons with disability with the balance comprised of national origin, race, religion or retaliation.
- ✓ Between 25 to 40% of those residents surveyed on housing discrimination feel they could be better informed.

Minority/Poverty Concentrations

- ✓ Presently (2019), minorities comprise about 23.7% of the Independence population. African Americans constitute 7.7% of the Independence population and Hispanics at 8.8%, with five other minority groups ranging from .4 to 2.4% of the total population.
- ✓ Minority concentrations exist in the northern and western parts of the city. About 12 census tracts have minority populations exceeding the citywide average of 23.7%.

- ✓ In 2019, the poverty rate of 17.2% in Independence is higher than Missouri at 12.9% and Jackson County at 13.5%.
- ✓ In 2019, the distribution of households in poverty in Independence to be concentrated in the western half of the community. This distribution did not generate any minority concentrations warranting HUD R/ECAP designated areas. R/ECAP areas are census tracts where more than half the population is non-White and 40% or more of the population is in poverty OR where the poverty rate is greater than three times the average poverty rate in the area (with revisions to these formula for non-urban areas).

HMDA Mortgage Origination

- ✓ Generally speaking, when the incidence of loan denials for new FHA/VA and conventional loans in 2017 were compared with the incidence of minorities by census tract in 2019, no correlations were evident whatsoever.
- ✓ For refinancing and home improvement loan denials, no coherent correlations were apparent due to data limitations.

Disability Accessibility

- ✓ Disability access is a major type of discrimination that exists in Independence according to the actual Title VIII complaints filed (>50%) on housing discrimination.
- ✓ In 2019, 15.8 percent of Independence's population has a disability (not institutionalized). This is slightly more than the State at 14.7% and Jackson County at 13.3%; however it was a bit more prevalent among young men (ages 5 to 17) and working age women (ages 36 to 64). The highest concentrations of persons with a disability are located in the central and western parts of Independence.

Education Accessibility

- ✓ As noted repeatedly in this study and affirmed by MARC, "The city of Independence has some concentration of people of color in its western reaches, and becomes increasingly white to the east where there are more job opportunities and services. However, because it is served by a single school district, children across the city have access to better educational opportunities".
- ✓ The HUD Labor-Market Engagement Index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. The highest levels of the labor market engagement index were evident in the southeast portions of Independence and the lowest in the central and western portions.

Transportation & Employment Accessibility

- ✓ Drawn from the MARC study, "the population center of Independence has access to 22 percent of the region's jobs within a 10-mile radius and Independence exported about 11,000 residents daily to work elsewhere in the region.
- ✓ For a 3-person single-parent family with income at 50% of the median income for renters in the region (i.e. metro area), residents in the portion of Independence are the most negatively impacted per the HUD Low Transportation Cost Index.

Public Policies and Zoning

- ✓ The City of Independence Zoning Code does not not make specific reference to the accessibility requirements contained in the 1988 amendments to the Fair Housing Act yet does define disability as the Federal Fair Housing Act.
- ✓ While the City of Independence zoning ordinance does not contain any special provisions for making housing accessible to persons with disabilities, the city's building code does have guidelines for accessibility.
- ✓ Municipal consideration be given to the adoption by Independence of a formal reasonable accommodation policy via ordinance for housing that informs and provides clear direction to persons with disabilities on the process for making a reasonable accommodation request.

Assessment of Current Public and Private Fair Housing Programs and Activities in Independence

The City of Independence continues to do a fine job completing a variety of activities aimed at furthering fair housing. Key accomplishments since the preparation of the last regional AI in 2016 continue to include:

- ✓ Sustained fair housing training for city staff.
- ✓ Maintenance of a fair housing page on the city's web page.
- ✓ Maintenance of a direct link from the city's web page to the HUD fair housing website.
- ✓ Maintenance of a call log for fair housing complaints and referrals.
- ✓ Ongoing fair housing complaint referrals to the HUD Fair Housing & Equal Opportunity (FH&EO) Division and Missouri Commission On Human Rights (MCHR)
- ✓ Sustained engagement of the professional housing community in discussion of fair housing issues.
- ✓ Continuing review of local ordinances for compliance with the Fair Housing Act and ADA.
- ✓ Continuing fair housing posters displayed in public buildings.
- ✓ Continuing purchases and distribution of fair housing marketing materials.
- ✓ Maintenance of the Fair Housing logo on business cards, local brochures and program marketing information.
- ✓ Sustained monitoring of sub recipients for compliance with fair housing and affirmative marketing requirements.

The city continues to update/maintain its fair housing web page which includes web links to the HUD Fair Housing & Equal Opportunity (FH&EO) and State Of Missouri Commission On Human Rights (Consumer Guide) web pages for filing fair housing complaints along with other information on a wide variety of other information and resources available. Fair housing brochures and information in Spanish continue to used and distributed throughout public locations in the city including the public library.

According to HUD, the following entities render fair housing information, outreach and counseling services in the Kansas City region.

- **Community Housing of Wyandotte County** — serves Wyandotte County, Kansas; focus on homeownership counseling.
- **Community Services League** — serves Eastern Jackson County; HUD-certified housing counseling.
- **Housing Information Center of Greater Kansas City** — serves metro Kansas City area; HUD-certified housing counseling.
- **Credit and Homeownership Empowerment Services** — located in Kansas City, MO; focus on homeownership counseling.
- **Legal Aid of Western Missouri** — serves the Missouri side of the Kansas City metro area; serves low-income residents with housing issues.
- **Neighborhood Assistance Corporation of America (NACA)** — located in Kansas City, MO; focus on homeownership.

The City of Independence's Fair Housing Coordinator continues to collaborate with relevant local and regional fair housing and affordable housing entities. The city's Fair Housing Coordinator and the ADA Accessibility Specialist continue to meet with Community Development Department staff about continuing to provide ongoing education to housing facility property owners and neighborhood associations on the importance of integrating people with disabilities into the entire community. The ADA Accessibility Specialist continues to render training to Community Development Department staff about accessibility and the need for increased accessible units in the City of Independence.

7.0 Conclusions, Recommendations and Independence Fair Housing Action Plan

Issue #1: Insufficient income for housing that continues to impede fair housing choice in Independence. Current data suggests that approximately 12,875 households or 49% of the population in Independence earning less than 80% AMI are cost burdened and likely facing other issues (i.e. overcrowding and substandard dwellings, etc) associated with the lack of affordable housing in the community.

Objective #1: Support the production of a range of affordable housing.

Objective #2: Improve the quality and maintain the current Inventory of affordable housing in Independence.

Objective #3: Continue to offer a range of affordable housing opportunities to those in need in Independence.

Objective #4: Utilize The Independence Housing Needs Assessment & Report, 2022-2042 as a guide concerning the investment of housing and community development resources and projects for affordable housing for disadvantaged and minority persons.

Objective #5: In concert with other jurisdictions and MARC, investigate a regional housing locator service to assist voucher holders find suitable housing.

Objective #6: Continue to administer the Rental Ready property inspections program going forward.

Objective #7: Continue to identify and mitigate deteriorated and abandoned properties in Independence.

Objective #8: On a continuing basis, ensure Hispanics are receiving their fair share of Section 8 vouchers and public housing resources given disparities identified in Independence from the MARC Analysis of Impediments To Fair Housing Choice, 2016-2021 report.

Objective #9: Continue to work with the lending community to discourage predatory lending practices within the City of Independence.

Objective #10: Continue to encourage and refer residents to attend classes on homebuyer education and foreclosure prevention held by providers.

Issue #2: Evidence of Housing Discrimination – A survey of Independence residents reveals that housing discrimination does exist. Increased public support and awareness, along with more documented evidence is needed.

Objective #11: Continue participation with local and regional fair housing organizations and consider sponsoring a local fair housing awareness event annually.

Objective #12: Continue to ensure that the fair housing Logo is on business cards, local brochures and program marketing information.

Objective #13: Continue to maintain a call log for all fair housing complaints and referrals via the city's landlord/tenant existing complaint procedures and sustain the city's fair housing website.

Objective #14: Continue to make fair housing complaint referrals to HUD Region VII FH&EO and the Missouri Commission On Human Rights.

Objective #15: Encourage Fair Housing Enforcement Agencies to target fair housing testing for multifamily properties.

Issue #3: Need for Community Education - The number and nature of the fair housing complaints being received from Independence residents continues to remain low. There is a need for more community education.

Objective #16: Continue to annually place ads in the "Independence City Scene, The Examiner and The Star" that goes out to all Independence households regarding the fair housing services provided by the City of Independence Community Development Department.

Objective #17: Annually, continue to sponsor or put on fair housing training for Independence residents. Specific information is provided in the Independence Landlord-Tenant Guide and continue to update that document as needed.

Objective #18: Continue to maintain a fair housing page on the City of Independence's web page that includes a direct link to the HUD fair housing website and community resources associated with filing complaints, fair housing advisory services and education, etc.

Objective #19: Continue to display fair housing posters and make fair housing materials available in City of Independence public facilities.

Objective #20: Continue to assess the need for local and CDBG public services funding for agencies effectively addressing fair housing issues and associated educational needs in the community.

Objective #21: Continue to foster fair housing education for landlords, realtors and lenders in the locality through the commitment of community resources.

Issue #3: Minority/Poverty Concentrations - Minority and poverty concentrations exist in the central and western part of the city.

Objective #22: Continue to implement the 24 Highway Fairmount Business District Plan completed in 2017 that has resulted in the funding of projects for area disadvantaged and minority persons through resources for targeted infrastructure, public improvements, transportation and economic development endeavors.

Objective #23: Continue to foster redevelopment in distressed neighborhoods of central and western Independence.

Objective #24: Enhance public transit opportunities in central and western Independence consistent with the city's adopted Comprehensive Plan for enhanced minority and disadvantaged population access to area employment opportunities.

Objective #25: Foster the receipt of CDFI and NMTC in the central and western portions of the City of Independence to strengthen area employment opportunities for lower income households.

Objective #26: Advocate for and update the regional transit plan consistent with the Independence Comprehensive Plan to connect affordable housing residents with area employment opportunities.

Objective #27: Continue to undertake targeted efforts to have Spanish fair housing brochures distributed to specific areas with concentrations of Hispanic minority populations.

Objective #28: Continue to implement a Limited English Policy for the City of Independence's Community Development Department.

Objective #29: Continue to provide education on fair housing to individuals/families for whom English is not their first language who come into the City of Independence's Community Development Department and Public Housing Authority for assistance.

Objective #30: Continue to encourage minorities and lower-income families to seek housing counseling that will help find housing outside areas of concentration.

Issue #4: Disability Accessibility - In addition to race and poverty, disability access was raised as the other major type of discrimination that exists in Independence according to residents surveyed on housing discrimination.

Objective #31: Derived from the 2016-2021 MARC Analysis of Impediments To Fair Housing Choice, consider the adoption by Independence of a formal reasonable accommodation policy via ordinance for housing that informs and provides clear direction to persons with disabilities on the process for making a reasonable accommodation request.

Objective #32: Foster affordable and accessible housing in a range of unit sizes for disabled persons pursuant to the City of Independence Comprehensive Plan and investigate universal design initiatives.

Objective #33: Continue to refine and distribute the Independence Landlord-Tenant Guide which offers guidance on the process and rules for persons with disabilities to make a reasonable accommodation request.

Objective #34: Annually, continue to partner with other local and regional fair housing and other agencies to sponsor and facilitate a community education event about fair housing and how it pertains to disability issues.

Objective #35: Continue to provide a part-time ADA Accessibility Specialist in the Independence Community Development Department.

Objective #36: Continue to encourage the development of handicapped accessible or adaptable housing on all projects receiving federal funds.

Issue #5: Public Policies, Land Use and Zoning - A survey of the policies and practices of the City of Independence Zoning and Planning Codes indicates general compliance with federal Fair Housing legislation but undertake sustained reviews going forward to ensure conformity.

Objective #37: Continue to implement the City of Independence Revised Comprehensive Plan in 2017 through the strategic targeting of housing and community development resources projects for disadvantaged and minority persons in the locality as well as guidance in addressing fair housing mitigation issues via land use policies and regulations.

Objective #38: Continue to set Independence affordable and fair housing goals consistent with its Consolidated Plans and Comprehensive Plans.

Objective #39: Encourage Development of a Variety of Housing Types per the provisions of the Independence Comprehensive Plan and consider compact use zoning provisions.

Objective #40: Continue to provide fair housing training to City of Independence staff, particularly targeting Community Development Department staff.

Objective #41: Continue to review of Zoning and Planning Codes to determine if there are any guidelines that may discourage affordable housing.

Issue #6: Advocate for the sustained implementation of regional fair housing initiatives generated by and in the most recent MARC Analysis Of Impediments To Fair Housing Choice for metro Kansas City.

Objective #42: Continue to advocate for and assist MARC with the regional housing locator initiative, universal design incentive policies, Kansas City rising

education and job training initiatives, transportation option partnership, the alignment of regional transit to jobs initiatives, the generation of regional affordable housing education initiatives and the continuing generation of fair housing goals and metrics.

Oversight and Monitoring

The Analysis of Impediment process has been conducted under the oversight and coordination of the City of Independence Community Development Department (CDD). The City of Independence Community Development is the lead agency for the City of Independence with responsibility for ongoing oversight, self-evaluation, monitoring, maintenance and reporting of the City's progress in implementing the applicable actions and other efforts to further fair housing choice. The Community Development Department, as the designated lead agency, will therefore provide oversight, as applicable, of the following activities.

- ✓ The CDD will evaluate each of the recommendations and remedial actions presented and ensure consultation with appropriate City Departments and outside agencies to determine the feasibility of implementation.
- ✓ The CDD will continue to ensure that all sub-grantees receiving CDBG, HOME and other grant funds have an up-to-date Affirmative Fair Housing Marketing Plan; display a Fair Housing poster and include the Fair Housing Logo on all printed materials as appropriate; and provide beneficiaries with information on what constitutes a protected class member and instructions on how to file a complaint.
- ✓ The CDD will ensure that properties and organizations assisted with federal, state and local funding are compliant with uniform federal accessibility standards during any ongoing physical inspections or based on any complaints of non-compliance received by the City.
- ✓ The CDD will continue to support Fair Housing outreach and education activities through its programming for sub-recipients and its participation in community fairs and workshops; providing fair housing information brochures at public libraries and City facilities; and sponsoring public service announcements with media organizations that provide such a service to local government.
- ✓ The CDD will continue to refer fair housing complaints and or direct person persons desiring information or filing complaints with the United States Department of Housing and Urban Development Fair Housing and Equal Opportunity Regional Office in Kansas City, MO and the Missouri Commission On Human Rights in Jefferson City.

Maintenance of Records

In accordance with Section 2.14 in the HUD Fair Housing Planning Guide, the CDD will maintain the following data and information as documentation of the City's certification that its efforts are affirmatively further fair housing choice.

- ✓ Copies of the Analyses of Impediments to Fair Housing Choice and any updates will be maintained and made available upon request.

- ✓ Efforts taken as part of the implementation of this report and other relevant endeavors associated with the remediation of impediments to fair housing choice.

DRAFT