IMPLEMENTATION GUIDE

ADVANCING EQUITY IN LOCAL HOUSING DEVELOPMENT

IMPLEMENTATION GUIDE
AFFORDABLE HOUSING SUPPLY TOOLKIT:
COMMUNITY PLANNING AND DEVELOPMENT PROGRAMS

IMPLEMENTATION GUIDE

ADVANCING EQUITY IN LOCAL HOUSING DEVELOPMENT

Disadvantaged communities face systemic housing challenges created by past governmental and market decisions, including segregation, redlining, access to credit, exclusionary zoning, and urban renewal. These decisions have led to a higher housing cost burden, more limited access to opportunity, and a growing racial wealth gap. Today, housing investments can continue to perpetuate these patterns, often unintentionally. This guide identifies tangible actions that local governments can pursue to chart a different course, successfully address and repair these harms, and ensure a more equitable impact when adding to the local housing supply.

CONTENTS

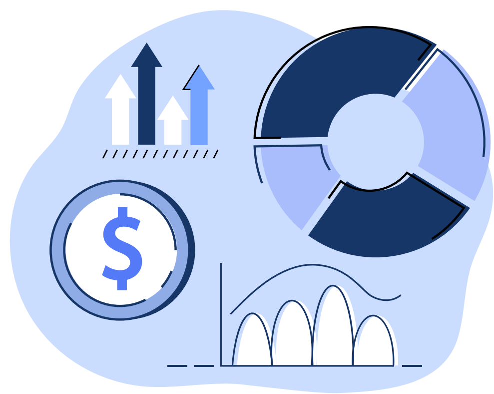
INTRODUCTION

Historically underserved communities face systemic housing challenges: Exclusionary zoning, urban renewal, discriminatory lending and practices, and inaccessible design have led to segregated communities and created disparities that include a higher housing cost burden, limited access to opportunity and jobs, and a widening wealth gap. Government actions and institutions have played a significant role in the creation and endurance of inequitable housing policies. Without deliberate acknowledgment of and attention to address these historical injustices, today's actions to increase local housing supply can perpetuate or worsen inequities.

Incorporating policies and practices to increase equity in housing and community development efforts is not easy; however, it is necessary. New affordable, accessible housing development will not repair decades of harm. Still, if planned with intention, it can be a meaningful starting point. Municipalities must go further to put an end to the catalysts perpetuating disparities and employ strategies, including meaningful engagement with underserved communities, targeted investments that advance opportunities and mitigate displacement risk, and equitable economic development through procurement practices.

Learn more
[Applying an Equity Framework to Guide Housing Decisions]

Meaningful engagement with underserved communities



Targeted investments that advance opportunities and mitigate displacement risk

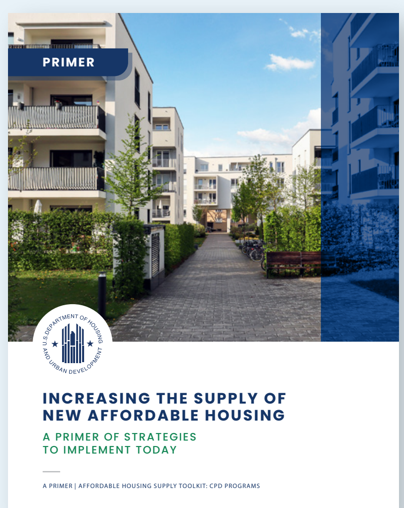
Equitable economic development through procurement practices

Early in the development process, local governments should explore questions such as the following:

- How have our prior housing decisions created disparities that continue today?
- What is our understanding of the housing needs of underserved communities?
- Which communities or populations in our city have been historically disadvantaged by our decisions?
- Have our local decisions resolved or perpetuated harmful conditions for underserved communities?

INCREASING THE SUPPLY OF NEW AFFORDABLE HOUSING

In 2023, the U.S. Department of Housing and Urban Development (HUD) published a **Primer** for state and local government officials who are seeking to explore pathways to create more affordable housing in their communities. The Primer encourages local and state governments to use their regulatory authority and public resources, including HUD's Community Planning and Development (CPD) funds, strategically and creatively to leverage other sources of funding for housing and community development activities. The **Implementation Guide series** was developed to expand on some of the concepts described in the Primer, providing readers with an actionable plan and step-by-step guide to implement each of the strategy components highlighted.



ABOUT THE IMPLEMENTATION GUIDE

The *Advancing Equity in Local Housing Development Implementation Guide* provides direction to the U.S. Department of Housing and Urban Development's (HUD) Community Planning and Development grantees on advancing equity through local strategies, policy, and investment decisions for affordable housing development. The guide details equity concepts, actions to advance equity throughout the development process, and national case studies on equitable development. It also provides references to HUD initiatives that advance equity and highlights additional resources that grantees may use to assist their efforts in embedding equity within local housing strategies.

APPLYING AN EQUITY FRAMEWORK TO GUIDE HOUSING DECISIONS

Municipalities can use an equity framework to analyze the impact of housing supply actions on underserved communities. An equity framework is a lens, process, and practice designed to help those who hold power interrupt inequities and increase the opportunity to achieve equity for those most affected by those designs. It helps local government systematically assess the impact of all of its decisions, including housing decisions, and select those actions that most effectively reduce disparities. While the majority of this guide focuses on those strategies, it is also important for organizations to take the first steps by evaluating the internal norms and processes that affect decisions.

When developing an equity framework, consider creating organizational definitions of diversity, equity, inclusion, and accessibility to ensure a baseline understanding among elected officials, staff, community members, and organizational partners. Common language helps create consensus around intended housing outcomes.

Equity Into Actions

HUD is embedding equity into its actions in the **Equity Action Plan**, updated in 2023. The plan is focused on four action areas: procurement, fair housing and civil rights resources, homeownership, and homelessness.

HUD uses the following definitions:

Diversity: The practice of including the many communities, identities, races, ethnicities, backgrounds, abilities, cultures, and beliefs of the American people, including underserved communities.

Equity: The consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment.

Inclusion: The recognition, appreciation, and use of the talents and skills of employees of all backgrounds.

Accessibility: The design, construction, development, and maintenance of facilities, information and communication technology, programs, and services so that all people, including persons with disabilities, can fully and independently use them.

An example of how communities can establish an equity framework is provided in the **Racial Equity: Getting to Results** tool, published by the Governmental Alliance on Race and Equity (GARE). The tool identifies three phases—normalization, organization, and operationalization—through which governments can establish a framework to build equity into their decision-making processes.

GARE recommends three phases through which local governments can build equity into their decision-making:

Phases	Benchmarks	Levers of Action
Normalize: Create a shared understanding of equity.	• We have a shared understanding of terms. • Our agencies share the values of equity, inclusion, diversity, and understanding. • We foster a work environment where staff respect one another, regardless of background.	Implicit Bias Training
Organize: Build organizational capacity for equity throughout government agencies.	• Our staff represents the demographics of our community. • Our staff has lived experience, which assists us in understanding and responding to community needs. • We procure contracts with enterprises from underserved communities.	Equitable Procurement and Hiring Decisions
Operationalize: Embed equity into housing strategies and community partnerships.	• We intentionally engage with underserved and hard-to-reach residents about their housing needs. • We can evaluate which housing investments and strategies meet those needs. • We partner with community-based organizations to implement strategies.	Place-Based Investments, Community Engagement, and Tax and Financial Incentives

The remainder of this guide focuses primarily on *operational actions* that local governments can take to advance equity when boosting housing supply. The actions that are described below may be used as initial steps that governments can take to get started.

WHAT IS INCLUDED IN THIS GUIDE?

This guide outlines five actions that grantees should take to advance equity as part of their housing supply strategies. A community may employ one or all of these actions. The guide also includes case studies and vignettes to help communities match the most appropriate actions to their own history and context.

The actions are as follows:

1. Know Your Historical Context
2. Meaningfully Engage With Underserved Communities
3. Foster Equitable Economic Development Through Affordable Housing
4. Create Partnerships for Reinvestment
5. Use Data to Hold Your Jurisdiction Accountable

Case Studies

Portland North/ Northeast Preference Policy

Lucy Gonzalez Parsons Apartments, Chicago, Illinois

Twin Cities Developer of Color Initiative/ Minneapolis Developer Technical Assistance Program

Tucson, Arizona/Pima County Community Land Trust Program

ADVANCE EQUITY ACTIONS

ACTIONS

1. *Know Your Historical Context*
2. *Meaningfully Engage With Underserved Communities*
3. *Foster Equitable Economic Development Through Affordable Housing*
4. *Create Partnerships for Reinvestment*
5. *Use Data to Hold Your Jurisdiction Accountable*

1 KNOW YOUR HISTORICAL CONTEXT

Policies and systems constructed decades and centuries ago helped foster inequities that continue today. These systems may have originated from public policy decisions, such as redlining, highway construction or inaccessible design standards, or from private decisions, such as racial covenants or blockbusting. An assessment of the past can demonstrate how inequities, such as disinvestment, displacement, or community opposition to new housing, continue in the present.

Although no two places or communities are exactly alike, harmful policies can create similar outcomes. A local assessment can point to the most appropriate housing interventions.

Affirmatively Furthering Fair Housing

The 2015 **Affirmatively Furthering Fair Housing (AFFH)** rule, a provision of the Fair Housing Act of 1968, requires recipients of federal funding to take meaningful actions with their federal funds to overcome historical patterns of deliberate housing segregation, promote fair housing choice, and eliminate disparities in opportunities. HUD published a proposed update in 2023 that is under current consideration.

For example:

Community A

Today, **Community A** is a predominately African-American neighborhood, where residents initially moved to seek high-paying industrial jobs. White residents were afforded access to federally guaranteed mortgages, which fueled their economic mobility into new suburban communities. Black residents were denied credit from banks, frequently shepherded by federal policy, which made it impossible for them to qualify for loans to reinvest in their properties and left little home equity to finance education. Today, this neighborhood needs public and private investment. It has many residential buildings vacant or in disrepair; a need for decent, safe housing; and members of the community who fear that additional affordable housing will bring more blight.

Housing Interventions:

The local government can encourage additional public and private investment through the following:

- Strategies to address neglected properties through a demolition, acquisition, or a "blight" tax
- Programs to redevelop banked land as infill housing
- Calling for a mix of low-, moderate-, and middle-income units in development solicitations
- Additional public investment in affordable housing on key sites
- Reinvestment in local infrastructure

Community B

Community B was a destination for immigrants from Mexico in the 1990s as it had a substantial number of rental units with naturally occurring affordability. The 2008 financial crisis and subsequent prevalence of foreclosure hit this neighborhood hard. Outside investors purchased these foreclosed properties in droves, often outbidding locals due to cash offers and an understanding of the foreclosure process. Over time, new owners redeveloped them, which made the neighborhood's housing more expensive and led to the displacement of residents and businesses.

Case Study
Portland North/Northeast Preference Policy

Housing Interventions:

The local government can address displacement pressures through the following:

- Development of new affordable housing on city-owned and institutionally owned property
- Inclusion of culturally relevant amenities, such as affordable commercial or open space, in new affordable housing developments
- Adoption of programs that address the demolition or conversion of naturally occurring affordable housing

Community C

Community C might have a majority of white and affluent residents today, but that was not always the case. Before the land was appropriated by European settlers, it was stewarded by a Tribe whose residents were ultimately displaced. The new occupants used this land to build new housing, schools, and employment centers; however, Tribal descendants often live far from these amenities and have no access to them.

Housing Interventions:

The local government can address disparities in land ownership through the following:

- Establishment of a Community Land Trust (CLT) governed by a board of Tribal members
- Acquisition by a CLT of scattered sites on which to build new housing in locations near jobs, public transit, education, healthcare, fresh food, and other amenities
- Awarding of preference points to applicants who can demonstrate that they have been affected by displacement

Guidelines

When a community makes housing policy or investment decisions, follow these guidelines:

DO:

✓ Reflect on how local land use or development policies have affected underserved populations.

✓ Discuss history when engaging with residents. Listen and develop a deeper understanding of their perspectives.

✓ Publicly acknowledge historical harms.

✓ Ask whether a proposed policy addresses racial disparities. If it does not, it continues these disparities. *No housing policy decision is race neutral.*

DON'T:

✗ Just study maps or data. Some stories are untold in the dominant narrative.

✗ Assume that a new policy will address disparities simply because it results in additional housing units. If affected underserved populations cannot access the housing, then the policy falls short of meeting the community's needs.

✗ Hold public meetings that provide little opportunity for meaningful engagement.

CASE STUDY:

Portland North/Northeast Preference Policy

What Is It?

The North/Northeast (N/NE) Preference Policy creates preference points within city-assisted housing for those displaced from prior urban renewal actions. It is targeted toward Portland's N/NE neighborhood, which was historically Oregon's largest Black neighborhood before highway construction led to significant displacement.

This Preference Policy applies to new affordable rental and homeownership units financed by the Portland Housing Bureau, which manages the city's Community Development Block Grant and HOME Investment Partnerships programs. Applicants are given preference if they can demonstrate that they or their families were previously displaced from N/NE. Families whose homes were condemned under an eminent domain action taken by the city receive the maximum priority.

What Challenge Did It Address?

Highway construction and eminent domain actions first occurred decades ago and generated a wave of disinvestment that displaced many Black families from N/NE. More recently, market pressure created a second wave of displacement. The Preference Policy targets those displaced by these harms. Households can claim points if their parents, grandparents, or former guardians resided in and were affected by urban renewal in N/NE.

How Did It Produce Equitable Outcomes?

As of 2024, the Preference Policy had been applied to 473 available affordable housing units and allowed 400+ families to remain in or return to N/NE. The majority of these households were at risk of displacement from elsewhere in N/NE, although several have returned from as far away as North Carolina.

2 MEANINGFULLY ENGAGE WITH UNDERSERVED COMMUNITIES

Residents understand their community's needs better than anybody else. While adding housing supply, governments should regularly consult with residents to understand their needs, address them through housing investments and strategies, and report back to community members on progress made. This requires effort. Residents have busy lives with responsibilities that may include juggling multiple jobs and caring for children or elders. They may not be able to leave a shift early to participate in a meeting or find affordable childcare. Some may not speak English. For all of these reasons, traditional communications channels may not be designed to reach these residents.

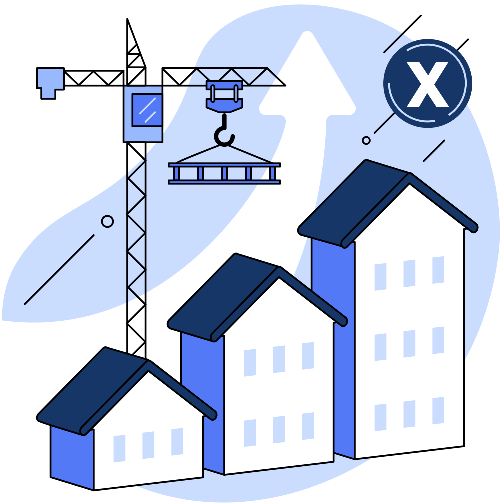
Some residents may express cynicism for the process if past engagement was not transparent or did not lead to positive outcomes. In many cases, when disparities worsen, residents blame the government for prior broken promises. Meet this distrust head on and devise engagement strategies that meet residents where they are.

Violence Against Women Reauthorization Act

Survivors of domestic and sexual violence face a number of serious housing problems related to the acts of violence committed against them. The **Violence Against Women Reauthorization Act**, recognizes that families are being discriminated against and denied access to and even evicted from housing because of their status as survivors. Focusing on defending survivors' rights to maintain rental housing is particularly crucial because women living in rental housing experience domestic violence at three times the rate of women who own their homes.

For example:

Community A is a racially diverse community with many single-family homes and a few apartment buildings. When the community holds meetings at the same location on Monday evenings, only homeowners attend. Recently, a developer proposed building 100 units of affordable housing with city financial assistance. Homeowners showed up in opposition to the development and the meeting was reported on the evening news. The coverage created political pressure for the city to drop its financial assistance. As a result, the developer rescinded its proposal.



In the future, this city could better address the perspectives of all residents. This includes the following:

- Identifying alternative venues and meeting locations.
- Conducting outreach via libraries and schools, which are more trusted spaces for families.
- Offering low-cost or free childcare and meals at the meeting.
- Compensating underrepresented residents for their input.
- Helping key decision-makers understand that the loudest voices are not representative of all residents.

Case Study
Lucy Gonzalez Parsons Apartments, Chicago, Illinois

Community B is a historically underserved community with many foreign-born residents. It has a high housing cost burden, and it lacks shopping and amenities. The city wants to add affordable housing due to the neighborhood's available land and proximity to downtown. The city also hopes to address the housing cost burden and avoid displacement. Recently, a developer proposed building 100 units of affordable one-bedroom apartments on a city-owned lot. To the total surprise of the city, residents opposed the building because it lacked family-sized housing and a grocery store.

Limited English Proficiency Initiative

The HUD **Limited English Proficiency Initiative** provides funding for the creation and promotion of translated materials and other programs that support the assistance of persons with limited English proficiency.

In the future, this city could do a better job of learning about the community's needs during planning processes, such as the Consolidated Plan, and incorporating these needs into the project. This includes the following:

- Conducting outreach in additional languages.
- Contracting with community-based organizations to conduct the outreach.
- Asking about needs other than housing affordability, such as the number of bedrooms and desired features of new housing, shopping, and supportive services.
- Including the community's expressed needs in its request for proposal (RFP).

Guidelines

When a community makes a housing policy or investment decision, follow these guidelines:

DO:

- ✓ Observe whether underserved community members participate in public processes. Use data, if possible.
- ✓ Conduct outreach in multiple languages and via trusted organizations to better reach underserved residents. Treat residents as your partner. They know their community's needs better than you do.
- ✓ Stay accountable to underserved community members and report back to them, even when little or no progress has been made.

DON'T:

- ✗ Just check the box. Engagement should guide decision-making and not occur after the decisions are made.
- ✗ Fatigue residents by surveying them repeatedly. Act on their input.
- ✗ Assume that you will be trusted. You earn trust through transparency, honesty, and results.
- ✗ Assume that a meeting will reflect everyone's input. Some voices are louder than others.

CASE STUDY:

Lucy Gonzalez Parsons Apartments, Chicago, Illinois

What Is It?

In Chicago's Logan Square neighborhood, city departments collaborated with community-based organizations to facilitate the development of the Lucy Gonzalez Parsons Apartments on a city-owned parking lot, next to a transit station. The building contains 100 new units of affordable housing in a historically Mexican-American neighborhood with high displacement risk.

Community-based partners had identified the need for the housing through a racial equity impact assessment (REIA). Through the REIA, the city engaged community members and assessed who would benefit from or be burdened by the new investment. The REIA included four recommendations: (1) for the city to invest in affordable housing on the lot; (2) inclusion of a Latin-American style plaza, either on the lot or along a nearby commercial corridor; (3) an end to housing demolition elsewhere; and (4) the creation of other welcoming spaces. The city's departments utilized the REIA to implement recommendations and integrated community preferences when it developed the RFP for the city-owned lot.

What Challenge Did It Address?

Before the apartments were constructed, community anger had been rising. The neighborhood had recently experienced a flood of outside investment, which had resulted in the loss of existing affordable housing. Announcements about new developments were frequently only made in English, even though the neighborhood was home to many Spanish speakers. Community members had concluded that their needs were being ignored, despite having repeatedly provided feedback during the planning process.

How Did It Produce Equitable Outcomes?

The developer's proposal included features initially identified by community members in the REIA. The redevelopment includes several three-bedroom, ground floor townhomes designed for families. It also includes a new plaza, which will be home to street vendors displaced from elsewhere. The building's completion also added momentum to implement other anti-displacement measures in the REIA, including a demolition fee ordinance passed in 2021 and the development of another 189 units of new affordable housing that are under construction.

3 FOSTER EQUITABLE ECONOMIC DEVELOPMENT THROUGH AFFORDABLE HOUSING

It is important to view public expenditures in affordable housing supply as an opportunity to direct employment and contracting prospects to community members whom the new housing supply is benefiting. These opportunities include jobs to develop, design, construct, and manage the housing. By ensuring that employment opportunities generated by public funds directly support low-income and/or minority-owned enterprises, municipalities are promoting the economic health of their underserved communities.

Potential strategies include the following:

- **Expanding Section 3 thresholds in developments with HUD financial assistance:** The Section 3 cross-cutting requirement obliges municipalities who meet certain thresholds to provide, to the greatest extent feasible, economic opportunities to residents and businesses in the community where the financial assistance is expended. Instead of viewing the requirement as merely a “box to check,” go beyond the basic requirements and apply Section 3 to all developments receiving HUD funding. Additionally, consider expanding the opportunities to minority-owned business enterprises, not just those who meet socioeconomic criteria.
- **Building developer capacity:** Take additional steps to expand representation among those applying for public financing. Developers may need additional training to submit a complex public funding application, develop a project, and manage the asset(s). Consider training and educational opportunities for newer or less experienced developers of color. Partner organizations may run the training and help you update your underwriting criteria to improve uptake. Consider partnering with neighboring jurisdictions, counties, and state housing finance authorities.
- **Hiring staff and consultants who mirror the constituent demographics:** Your city will better understand underserved residents’ needs when its staff represents the community’s demographics. Value and recruit for lived experience when hiring full-time staff or consultants. Give equal weight to lived and technical experience and train for technical skills when necessary. For staff who interact with the public, ensure that there is additional representation in language and cultural competency to improve communications.

Case Study
Twin Cities Developer of Color Initiative/Minneapolis Developer Technical Assistance Program

Guidelines

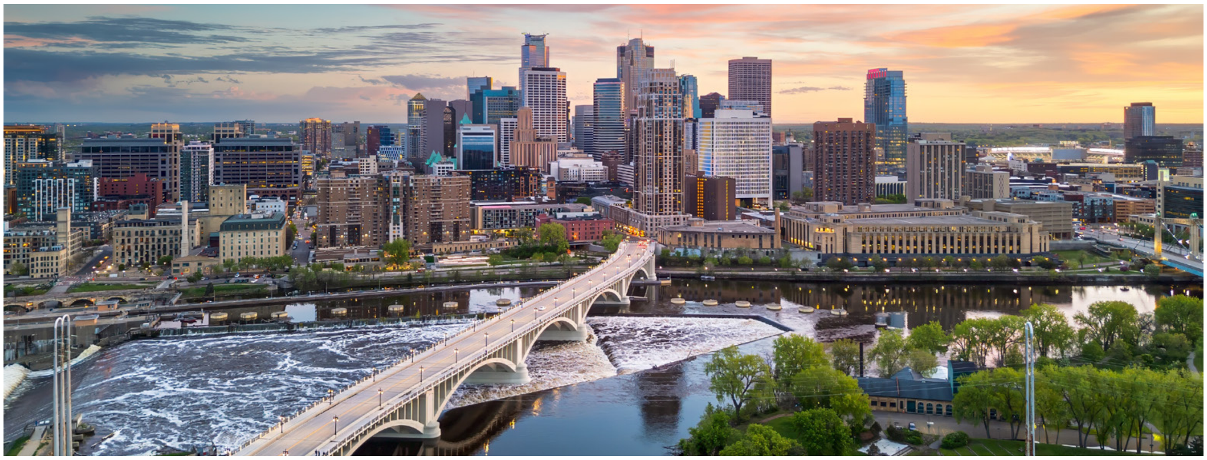
When considering these strategies, follow these guidelines:

DO:

- ✓ Ask whether your contracts are being awarded to underrepresented groups.
- ✓ Utilize partners, such as minority business supply councils or chambers of commerce, to better reach entrepreneurs of color.
- ✓ Work with other municipalities to build supplier lists.
- ✓ Staff and train municipal employees on Section 3 requirements. Where feasible, apply the requirements beyond the thresholds.

DON'T:

- × Use contract set-asides for minority-owned enterprises as your only strategy. Be sure to focus on increasing the capacity of entrepreneurs of color to seek and win awards.
- × Only hire staff of color for external-facing positions. Ensure that their lived experience can influence and inform all internal policies and procedures.



CASE STUDY:

Twin Cities Developer of Color Initiative/Minneapolis Developer Technical Assistance Program

What Is It?

In Minneapolis, partners have created a new ecosystem to encourage emerging developers to build equitable housing developments:

- **The Twin Cities Developer of Color Initiative**, operated by Local Initiatives Support Corporation (LISC) Twin Cities, operates regionwide to break down barriers to entry for emerging developers of color. LISC supports each Developer of Color cohort through intensive development training, networking events, and facilitation of peer-to-peer advice.
- The **Minneapolis Developer Technical Assistance Program (DTAP)** offers free classes and technical assistance for developers. Graduates of either the city's or LISC's program then qualify for attending more targeted workshops on pro forma development, as well as direct 1:1 technical assistance.

Within Minneapolis, the programs have created a supportive ecosystem for emerging developers of color. DTAP staff help alumni navigate and secure financing resources across city departments, including the city's Affordable Housing Trust Fund and HOME-funded Minneapolis Homes program.

What Challenge Does It Address?

The complexity of the development process does not favor small developers of color. Challenges include navigating the landscape of public financing, securing funding, and other complexities of infill development. These barriers leave emerging developers and entrepreneurs of color uncompetitive compared with more established companies.

How Did It Produce Equitable Outcomes?

All LISC alumni and 94 percent of city technical assistance recipients have been developers of color. Ongoing support from city staff has helped these emerging developers utilize city financing tools. In response to feedback from emerging developers, program staff changed funding applications to make them more accessible.

Program alumni continue to be awarded new city and state development contracts. Specific developments awarded since 2022 include new Low-Income Housing Tax Credit housing developments in underserved Minneapolis neighborhoods affected by the George Floyd demonstrations, as well as 10 new small-scale multifamily developments on vacant lots, in accordance with recent zoning changes.

4 CREATE PARTNERSHIPS FOR REINVESTMENT

Community-based partners play key roles in implementing equitable housing development strategies. Community-based development gives partners influence and authority over new housing development. In turn, partnerships help municipalities ensure that the new housing better meets the needs of underserved residents.

Strategies vary depending on community context. Examples include the following:

- **Community Benefits Agreements (CBAs):** When negotiating an agreement for a major redevelopment effort, consider a CBA. CBAs can be voluntary or legal agreements between community benefit groups and developers, which stipulate local benefits in exchange for the support of neighborhood groups. CBAs can be executed in any development deal but frequently occur in public-private partnerships where approval for development rights and/or major financial supports require local political approval. CBAs can include the construction of affordable or family-sized housing, affordable retail space, open space, or commitment to local hiring. Whether a CBA is voluntary or legally binding, it should have an accountability and enforcement mechanism throughout the duration of the project.

Case Study

Tucson, Arizona/Pima County Community Land Trust Program

- **Community Land Trusts (CLTs):** CLTs can increase land ownership within an underserved community, including those experiencing displacement. CLTs typically acquire land within a community, develop housing, and sell the units to residents. Because the CLT owns the land, the property can be kept permanently affordable, while homeowners build equity and wealth. Local governments do not manage CLTs; however, they can provide technical assistance funding to those community representatives interested in establishing one. CLTs can be combined with other financial tools to acquire key sites and retain community control over development outcomes.
- **Affirmative Marketing:** Affirmative marketing ensures that outreach is conducted proactively to all groups so that those least likely to hear about the housing will apply. Affirmative strategies can be provided through city outreach, independent housing organizations, or shared tools. Consider using available data and information for affirmative marketing. For example, a city may work with all developers receiving its public funds to build a citywide or regional rental database, which lists all opportunities for affordable housing on a single website.

Guidelines

When considering these strategies, follow these guidelines:

DO:

- ✓ Ask whether local community groups support and can help shape housing supply strategies.
- ✓ Utilize your funding to provide technical assistance to build the capacity of community-based groups.
- ✓ Work together to find the right tool for the job (e.g., it may be costly to negotiate a CBA on a small site).

DON’T:

- ✗ Settle on a single strategy. Actions must be layered to maximize the community impact.
- ✗ Assume that one size fits all. Collaborate with your community and development partners to find the right tool(s) to use.

CASE STUDY:

Tucson, Arizona/Pima County Community Land Trust Program

What Is It?

When the city of Tucson created its policy for accessory dwelling units (ADUs), it partnered with the Pima County Community Land Trust (PCCLT) to broaden homeowner awareness and collect community input on the impact of the change on the city's majority Latino communities, many of which are underserved. After the city changed its code to allow ADUs in residential areas, the partners realized that PCCLT could better connect with residents and help them build new ADUs to generate income and slow displacement.

Through city and philanthropic support, the *Mi Casita* project has facilitated the development of ADUs through the following:

- Conducting in-person community meetings and outreach to residents, in both English and Spanish, that highlighted ADU policy and identified community barriers to construction.
- Posting readily accessible educational materials on the process and assistance available for developing ADUs, such as YouTube videos, available in both English and Spanish.
- Providing mini grants of up to $10,000 to underserved homeowners, which can be utilized for predevelopment costs.

What Challenge Does It Address?

Known locally as *Casitas*, ADUs historically provided Tucson families with affordable, multigenerational housing options. Over time, they were restricted through the city's zoning code. In 2022, when the city began allowing them again in residential areas, affluent homeowners had access to capital and resources to develop them; however, low-income homeowners did not. Without the assistance provided through PCCLT's program, underserved residents would have been less likely to explore developing ADUs and benefit from the change.

Housing for Older Persons

Critical for supporting the rapidly growing population of America's older adults is expanding the supply of **aging-friendly housing options**, rental assistance, home repairs and modifications, accessible residential design, and community planning. Additionally, improving the links between housing and healthcare, among other strategies, can help seniors age safely, comfortably, and affordably in their homes and communities.

How Does It Produce Equitable Outcomes?

The *Mi Casita* meetings connected the city with community members, ensured that homeowners understood the new ordinance, and identified barriers to developing ADUs that city policy could address. As a follow-up action, city staff modified utility metering requirements, held a design competition to promote model building plans, and identified impact fees as a priority. Additionally, program staff are bilingual and help community members make direct connections with contractors, architects, and others.

The model ADUs have utilized traditional architectural techniques to increase interest in the policy. For example, an ADU in Tucson's Barrio Hollywood neighborhood uses low-cost clay and adobe construction techniques traditionally found in Arizona's Latino communities. These ADUs inspired the construction of similar low-cost adobe residential buildings across the neighborhood.

5 USE DATA TO HOLD YOUR JURISDICTION ACCOUNTABLE

Equitable housing development should narrow gaps in opportunity. Governments can use quantitative and qualitative data to monitor whether housing production has affected disparities. Governments can also use data to report on progress and hold themselves accountable with residents if needs remain unaddressed.

Quantitative Data

Housing planners regularly start with housing cost burden measured as a percentage of income and Area Median Income across income groups, available via HUD Comprehensive Housing Affordability Strategy (CHAS) data. While important, this will not tell the entire story about how increased housing supply affects historically underserved groups. In addition to measuring CHAS, consider directly measuring outcomes through the American Community Survey. Due to multiyear sampling, data may not significantly change year over year; however, it will provide an ongoing snapshot of unmet needs. Consider utilizing other data tools, such as PolicyLink's National Equity Access, the Urban Institute's Data and Tools for Fair Housing Planning, or the Center for Neighborhood Technology's Housing + Transportation Affordability Index to capture measures of access to opportunity not reflected in housing data.

Use Your Consolidated Plan

HUD grantees can utilize a housing needs assessment and the analysis of impediments (AIs) to measure progress and barriers. In the Chicago and Washington, DC regions, local municipalities have joined forces to produce regional AIs that go beyond HUD baseline requirements and use quantitative and qualitative data to comprehensively measure disparities in housing for underserved populations across multiple jurisdictions.

Additionally, map the location of housing investments against your city's racial composition or income distribution. Very frequently, maps of housing investment mirror the redlined maps of today's underserved communities. Ask the following questions:

- Is the new market rate housing concentrated in affluent, majority white areas?
- Is subsidized, affordable housing concentrated within underserved communities?
- Is subsidized, affordable housing concentrated in communities with poor transportation access or underserved schools?
- Is public financing awarded to projects distributed across all communities?
- Are underserved communities awarded a higher share of the funding given that they have been shut out of investment in the past?

If data shows that housing strategies have reinforced existing patterns, then the city should change its approach.

Qualitative Data

Without context, data will not provide a comprehensive story at the neighborhood level. Consider utilizing surveys and engagement conducted via past plans to monitor whether new housing meets local needs. Use engagement to identify what may be missing, such as multi-bedroom units, retail and amenities, and open space. As noted in the engagement section, it can be difficult to build trust with underserved communities, so partner with community-based organizations to collect information.

RESOURCES

HUD has produced additional resources to help your community embed equity into housing supply decisions:

- **Liberty Bank Building, Seattle, WA, Case Study**, Affordable Housing Supply Toolkit
- **HUD's Equity Action Plan**
- **Community Engagement Toolkit: Building Purpose and Participation**
- **Citizen Participation & Equitable Engagement (CPEE) Toolkit**
- **Reasonable Accommodations and Modifications**
- **LGBTQIA+ Fair Housing Toolkit**

Utilize these additional resources, which are available through public and not-for-profit partners:

- **Advancing Racial Equity in Housing, Land, and Development**, Government Alliance on Race and Equity
- **Disability Justice and Equity in Housing**, Shelterforce
- **Embedding Racial Equity in Housing**, National League of Cities
- **Housing America's Older Adults 2023**, Joint Center for Housing Studies of Harvard University
- **Housing Futures & Land Justice**, PolicyLink
- **LGBTQIA+ Equity and Housing Fact Sheet**, Opportunity Starts at Home
- **Place and Opportunity: Using Federal Fair Housing Data to Examine Opportunity Across US Regions and Populations**, Urban Institute
- **Racial Equity: Getting to Results**, Government Alliance on Race and Equity
- **Removing Barriers to Participation in Local and State Government Procurement and Contracting for Entrepreneurs of Color**, Urban Institute

ACKNOWLEDGMENTS

This document was authored by Kyle Smith, Toni Gallo, and Janine Cuneo with the support of Camille Brown and Melissa Mikel of ICF and Kaziem Woodbury, Jennifer Cobb, and Kirsten Cook of the Partnership for Southern Equity under the project management of Olga Mulherin.

ICF is grateful for the partnership, vision, and critical input from the many HUD staff dedicated to this effort.

This material is based upon work supported, in whole or in part, by Federal award number C-20-TA-VA-0011 awarded to ICF by the U.S. Department of Housing and Urban Development. The substance and findings of the work are dedicated to the public. Neither the United States Government, nor any of its employees, makes any warranty, express or implied, or assumes any legal liability or responsibility for the accuracy, completeness, or usefulness of any information, apparatus, product, or process disclosed or represents that its use would not infringe privately owned rights. Reference herein to any individuals, agencies, companies, products, process, services, service by trade name, trademark, manufacturer, or otherwise does not constitute or imply an endorsement, recommendation, or favoring by the author(s), contributor(s), the U.S. Government, or any agency thereof. Opinions contained herein are those of the author(s) and do not necessarily reflect the official position of, or a position that is endorsed by, HUD or any Federal agency.