
Analysis of Impediments to Fair Housing Choice



Pinellas Park, Florida

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Table of Contents

Executive Summary	1
Introduction.....	6
Community Profile.....	10
Existing Housing Stock.....	16
Disproportionate Housing Needs	17
Impediments to Fair Housing Choice	19
Public Sector Impediments	19
Private Sector Impediments	25
Public and Private Sector	31
Summary of Impediments to Fair Housing Choice	33
Recordkeeping	34

Executive Summary

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, protects the right to fair housing for all people and prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status and handicap (disability). The United States Department of Housing and Urban Development (HUD) administers and enforces the Fair Housing Act.

As a recipient of HUD funds, Pinellas Park certifies that it will affirmatively further fair housing by conducting an analysis of impediments to fair housing choice, take appropriate actions to overcome the effects of any impediments identified, and maintain records reflecting the analysis and actions taken in this regard. Pinellas Park is committed to ensuring fair housing choice for all residents within its jurisdiction.

The goal of this document, the Analysis of Impediments to Fair Housing Choice (AI) in Pinellas Park, is to assess the level of fair housing choice within the City's jurisdiction, identify potential impediments to fair housing choice, and recommend actions that the City and its partners can take to eliminate or remedy the identified impediments. The AI is an analysis and evaluation of housing discrimination and other impediments to fair housing choice. The analysis and evaluation serve as the basis for fair housing planning within Pinellas Park and provide essential information to policy makers, administrative staff, housing providers, lenders, and advocates to affirmatively further fair housing choice.

The City developed the AI based on input from fair housing agencies, housing professionals, non-profit advocates, and government agencies involved in the housing market. The analysis includes a review of Census and other data sets, local municipal laws and policies concerning housing. What follows is a summary of the sections of the plan.

Introduction

The Fair Housing Law was created in 1968 as an Act by Congress to prohibit discrimination in the sale, rental and financing of dwellings and any other housing-related transactions based on the protected classes. The Act initially included four protected classes: race, color, national origin, and religion. In 1974, the Act was amended to include sex as a protected class. In 1988, the Act was amended to include handicap and familial status and to provide additional remedies and strengthen enforcement.

In 1995, the U.S. Department of Housing and Urban Development (HUD) announced that entitlement communities – those communities receiving direct funding from Community Development Block Grant (CDBG), HOME Investment Partnership, and Emergency Shelter Grant (ESG), must conduct a study of existing barriers to fair housing choice. The required study is referred to as the “Analysis of Impediments” (AI).

The AI covers public and private policies, practices, and procedures affecting housing choice. Impediments to fair housing choice are defined as any actions, omissions or decisions that restrict, or have the effect of restricting that availability of housing choices, based on **race, color, religion, sex, disability, familial status or national origin.**

Each entitlement jurisdiction must commit to **Affirmatively Further Fair Housing (AFFH)**. The certification to affirmatively further fair housing specifically requires jurisdictions to do the following:

1. Conduct an AI to fair housing choice within the state of jurisdiction.
2. Take appropriate actions to overcome the effects of any impediments identified through that analysis.
3. Maintain a record reflecting the analysis and actions in this regard.

The purpose of the AI is to examine how state and local laws, private, public and non-profit sector regulations, administrative policies, procedures, and practices are impacting the location, availability, and accessibility of housing in a community. The AI is not a Fair Housing Plan rather it is an analysis of the current state of fair housing choice in Pinellas Park, Florida and identifies specific barriers that need to be addressed if future fair housing initiatives are to be successful.

Pinellas Park Florida Analysis of Impediments to Fair Housing

Introduction is an overview of the Fair Housing Act, impediments to fair housing choice which are prohibited by the Act, and a summary of Florida and local fair housing law.

Community Profile

The Community Profile provides geographic, demographic, housing, economic, and transportation information to put fair housing choice within a local context and analyzes the degree of segregation and restricted housing by race, ethnicity, disability, and familial status.

Impediments to Fair Housing Choice and Recommended Actions

The analysis of impediments to fair housing choice is divided into three sections: the public sector, private sector, and the public-private sector. The public sector analysis reviews local policies and procedures that regulate, monitor, or otherwise impact rental, sales, and property insurance practices. These policies can play a significant role in limiting or promoting fair housing choice. The private sector analysis examines impediments within the private marketplace, including actions of landlords, property managers, real estate agents, lenders, and other parties involved in the provision of housing. The public-private sector analysis focuses on areas of fair housing provided through a partnership of the public and private sector, including enforcement, education and outreach.

The analysis revealed the following impediments to fair housing choice within the City. Following each impediment is a set of recommendations that might be undertaken to address the problem. The recommendations are not mandates but rather suggested activities that the City of Pinellas Park and partner agencies or groups can take to improve access to housing options for all individuals. Additional investigation is also merited, in light of the lack of firm evidence to definitely identify the impediments that exist in this community.

Impediment #1: Lack of Public Awareness

There is evidence a substantial number of persons who experience discrimination do not report it. Among the reasons for lack of reporting include the inability to identify discrimination and belief that nothing will result from the report. In some cases, limited English proficiency plays a role as well. The largest impediment to fair housing choice is lack of consumer education regarding fair housing rights. There is a need for a multi-faceted approach that effectively reaches all affected

Pinellas Park Florida Analysis of Impediments to Fair Housing

parties, including housing consumers, housing professionals and landlords, government officials, and public advocacy groups.

Recommendation #1-1: It is recommended that the City maintain fair housing information, including how to file a fair housing complaint, on their web site.

Recommendation #1-2: It is recommended that the City seek to increase the availability of information for non-English speaking populations so that all population groups and ethnic subgroups to ensure that all citizens understand their rights. This could include fair housing brochures printed in Spanish, bi-lingual landlords, and translators available by appointment at various City offices. Materials can be produced and disseminated in print and through electronic and broadcast outlets. Two specific groups that were identified as potentially underserved are Vietnamese and Laotian.

Recommendation #1-3: It is recommended that the City commit to implementing homebuyer education classes at various locations, including the public library, the senior center, and recreation centers.

Recommendation #1-4: There is a need to better educate housing providers on Fair Housing Laws protecting persons with disabilities. This is particularly true for rental units controlled by Homeowner Associations and Condominium Boards as well as other communal housing providers relating to acceptance of assistance animals.

Impediment #2: Need for Greater Coordination

Given the limited amount of resources available to the City, a successful approach to affirmatively furthering fair housing will need involve other like-minded organizations within the region. Coordination is needed among government agencies, advocacy groups, and private market providers, such as landlords, property managers, and realtors.

Recommendation #2-1: It is recommended that the City of Pinellas Park officially designate a person as the City's Fair Housing Officer. This person will coordinate all fair housing actions and issues that arise through the City's programs.

Recommendation #2-2: It is recommended that the City of Pinellas Park will join and actively participate in monthly meetings of the Tampa Bay Fair Housing Consortium, which encompasses the greater Tampa Bay area of Pinellas, Hillsborough, and Pasco counties. The City will also seek

Pinellas Park Florida Analysis of Impediments to Fair Housing

to coordinate its efforts to affirmatively further fair housing with other local stakeholders, including the Pinellas County Department of Human Rights, the Pinellas County Housing Authority, the Housing Finance Authority of Pinellas County, the Pinellas County Economic Council, and the Countywide Planning Authority.

Recommendation #2-3: It is recommended that the City continue refining the referral process for low- and moderate-income individuals and families in need of housing assistance through Pinellas County's HOME and SHIP programs.

Introduction

Federal Fair Housing Law

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status, and handicap (disability). This protection extends to most housing.ⁱ The law makes the following actions illegal if based on race, color, national origin, religion, sex, familial statusⁱⁱ, or disability.

- Refuse to rent or sell housing
- Refuse to negotiate for housing
- Make housing unavailable
- Deny a dwelling
- Set different terms, conditions or privileges for sale or rental of a dwelling
- Provide different housing services or facilities
- Falsely deny that housing is available for inspection, sale, or rental
- For profit, persuade owners to sell or rent (blockbusting) or
- Deny anyone access to, or membership in, a facility or service (such as a multiple listing service) related to the sale or rental of housing

Given the importance of mortgage lending to acquire housing, the law extends to mortgage lending activities. The Fair Housing Act prohibits the following actions based on race, color, national origin, religion, sex, familial status or disability.

- Refuse to make a mortgage loan

ⁱ In some circumstances, the Act exempts owner-occupied buildings with no more than four units, single family housing sold or rented without the use of a broker and housing operated by organizations and private clubs that limit occupancy to members.

ⁱⁱ Familial status includes households with children under the age of 18 living with parents or legal custodians, pregnant women, and people in the process of getting custody of children under the age of 18.

- Fail to provide information regarding loans
- Impose different terms or conditions on a loan, such as different interest rates, points or fees
- Discriminate in appraising property
- Refuse to purchase a loan
- Set different terms or conditions for purchasing a loan

The Act provides protection for persons exercising a fair housing right and persons assisting others against threats, coercion, intimidation, and interference. The law prohibits advertisements and statements that indicate a limitation or preference based on race, color, national origin, religion, sex, familial status, or disability. The advertising prohibition applies to single-family and owner-occupied housing that is otherwise exempt from the Fair Housing Act.

The act extends additional protection to persons with disabilities. Federal law defines a disability as any "physical or mental impairment which substantially limits one or more of [a] person's major life activities, a record of having such impairment, or being regarded as having such impairment." Major life activities mean functions such as caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning and working.

A landlord or property manager may not refuse a request to make a reasonable modification to a dwelling or common use area if the modification is necessary for the person with a disability to use the housing. Landlords may require a resident to pay for a modification to the property and require the modification be removed when the resident vacates the property. If the modification were for something the federal law requires a landlord to have in place, the landlord would be responsible for the cost of the modification.

The landlord is not allowed to refuse a request to make a reasonable accommodation in rules, policies, practices, or services if the accommodation is necessary for the person with a disability to use the housing. A reasonable accommodation is at the resident's request and when a landlord or property manager voluntarily makes an exception to standard rules/policies to accommodate the resident's disability. The requested accommodation must be reasonable and should not present an undue burden on the landlord. If the accommodation is not reasonable or if it would impose an undue hardship on the landlord, the request may be denied.

Pinellas Park Florida Analysis of Impediments to Fair Housing

The Fair Housing Act requires newly constructed multifamily dwellings with four or more units to include specific basic design features of accessibility intended to make the units usable by a person who is or becomes disabled. Accessibility standards include: (a) public use and common use areas which are readily accessible to and usable by persons with disabilities; (b) doors designed to allow passage into and within the units which are sufficiently wide to allow passage by persons in wheelchairs; (c) an accessible route into and through each unit; (d) light switches, electrical outlets, thermostats, and other environmental controls in accessible locations; (e) reinforcements in bathroom walls to allow installation of grab bars; and (f) usable kitchen and bathroom for an individual in a wheelchair to maneuver about the space.

Housing developments must comply with the American Disabilities Act (ADA). The ADA does not generally apply to residential housing; however, ADA issues arise with the accessibility of common use areas in residential developments if the facilities are open to persons other than owners, residents, and their guests. Examples include: sales and rental offices, sales areas in model homes, pools and clubs open to the public, and reception rooms that can be rented to non-residents.

HUD defines impediments to fair housing as:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choice; or
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choice on the basis of race, color, religion, sex, disability, familial status, or national origin.

The concept of impediments to fair housing choice includes local laws and administrative policies that affect the location, availability, and accessibility of housing. Policies and practices that appear neutral may serve to adversely affect a person's ability to secure housing because of race, color, religion, sex, disability, familial status, or national origin.

Florida and Local Law

The State of Florida and Pinellas County have enacted fair housing laws that are substantially equivalent to the federal Fair Housing Act, Title VIII of the Civil Rights Act of 1968, as amended. Both the State (Florida Civil Rights Act (ss. 760.01-760.11) and the Fair Housing Act (ss. 760-20-760.37)), and Pinellas County (Chapter 70, Section 103, of the Pinellas County Code) disallow the same activities prohibited under the federal Act. Pinellas County Code has been amended to include protection to additional classes based on sexual orientation in 2008, and gender identity in 2013, and applies to all territory within the legal boundaries of Pinellas County, Florida, including all unincorporated and incorporated areas.

Methodology

The City developed the Analysis of Impediments based on input from fair housing agencies, housing professionals, non-profit advocates, and government agencies involved in the housing market. The analysis includes a review of Census and other data sets and local municipal laws and policies concerning housing.

Community Profile

In May of 1911, the Florida Association purchased 12,800 acres in what was then part of western Hillsborough County and created Pinellas Farms. The area became known as the “health Resort among the Pines”, and was granted a charter in 1915 to become the township of Pinellas Park. Between 1935 and 1969, the city, originally a small agricultural community, grew in response to commercial development along its major roadways and the growth of St. Petersburg to the south. Pinellas Park's growth continued in the years following facilitated by its prime location and the abundance of industrial property.

Today, Pinellas Park is a progressive, growing city of over 52,800 residents, with a diversified economy based firmly in educational services, health care and social assistance as well as retail and manufacturing. Pinellas Park offers the advantages of a large, metropolitan area, while retaining a small town atmosphere.

Pinellas Park is ideally located at the heart of Pinellas County on Florida's Gulf Coast, an area commonly referred to as the Suncoast. It is directly located, from the Gulf of Mexico, 15 miles west of Tampa and 5 miles generally north of downtown St. Petersburg. Pinellas Park is a mid-sized City in the Tampa Bay area. The City is the hub of the Suncoast's transportation network. Being the confluence of eight regional roads: Ulmerton Road, Roosevelt Boulevard, Park Boulevard, 66th Street, 49th Street, Belcher Road, U.S. Highway 19, and I-275. The CSX Railroad also traverses the City.

In Pinellas Park, continued economic growth can be attributed in part to the area's exceptional quality of life, including its favorable weather conditions, clean air and water, proximity to beaches and abundance of leisure activities. Pinellas Park is also home to approximately one-third of all industrial lands in the County. This means the City has great potential for all types of new business and industry.

Demographic Trends

Pinellas Park is the fourth largest city, by population, in Pinellas County, Florida. According to the 2017 population estimate of the U.S. Census, Pinellas Park’s estimated population was 52,854. The City has added 3,775 residents since the 2010 Census. This represents an annual growth rate of approximately one percent or 540 new residents. Population projections produced by the County Department of Planning estimates that the population for the planning sector containing Pinellas Park will grow only slightly through 2030.

<u>Year</u>	<u>Population (1)</u>	<u>Estimated Personal Income (2)</u>	<u>Per Capita Personal Income (3)</u>	<u>Median Age (4)</u>	<u>Public School Enrollment (5)</u>	<u>Unemployment Rate (6)</u>
2016	52,497	\$ 2,177,890,542	\$ 41,486 *	47.1	6,753 *	4.3 %
2015	50,946	2,113,545,756	41,486	46.9	6,753	4.7
2014	50,352	2,039,407,056	40,503	47.4	6,949	5.8
2013	49,969	1,976,174,012	39,548	46.8	7,175	6.5
2012	49,653	1,917,847,125	38,625	46.6	7,022	8.4
2011	49,286	1,861,285,790	37,765	46.3	7,065	10.3
2010	48,682	1,775,091,766	36,463	45.6	7,902	12.0
2009	48,939	1,740,760,230	35,570	45.2	7,756	11.3
2008	49,231	1,711,466,484	34,764	45.1	7,665	6.7
2007	49,403	1,683,851,852	34,084	44.7	8,248	4.0

This study compared the data in the 2006-2010 and the 2012-2016 ACS data sets produced by the US Census to determine any trends in the racial and ethnic makeup of the City population. The racial and ethnic composition of Pinellas Park changed only slightly in recent years.

According to the most recent data, the White population comprised 82.5% of residents compared to 83.5% in 2010. The largest minority populations are Asian (8.1%) and African American (5.2%). There are very few American Indian residents (202) and no Native Hawaiian/Pacific Islander residents. The remaining residents identified as “Other” (1.2%) or multiracial (2.6%). The Census treats Hispanic/Latino as an ethnicity and is accounted for outside of the racial categories. In the most recent data set, 10.2% of Pinellas Park residents were Hispanic/Latino.

The total population increase was 2,171. Approximately 61% of this growth was White (1,332 residents), 19% was multi-racial or other (546 residents), 16% was Asian (353 residents), and 3% was American Indian (60 residents). Both the African American and Hispanic population decreased slightly over the same period of time (70 residents and 116 residents, respectively).

Pinellas Park Florida Analysis of Impediments to Fair Housing

When considering all family types with children present, the data indicates that 72.1 percent of all white households, 7.5 percent of all African American households, 10.8 percent of Asian households, and 17.2 percent of all Hispanic households were in this household type.

Income levels are disproportionately lower among African Americans and Hispanics living in Pinellas Park, with the median household income reported to be \$36,250 and \$36,523 respectively. Median income levels for Whites was \$41,586 and Asians \$64,787. The 2012 – 2016 American Community Survey reports the median household income to be \$41,669.

Household Type	Renter by % Area Median Income				Owner by % Area Median Income			
	0-30%	30-50%	50-80%	Total	0-30%	30-50%	50-80%	Total
Small Related	345	255	365	965	135	70	420	625
Large Related	0	20	10	30	10	35	50	95
Elderly	70	200	100	370	304	595	660	1,559
Other	235	405	380	1,020	170	75	94	339
Total	650	880	855	2,385	619	775	1,224	2,618

Household Type	Percent of Area Median Family Income				
	0-30%	30-50%	50-80%	80-100%	>100%
Small Family	700	425	1,090	845	4,995
Large Family	10	55	95	145	465
At least one person 62-74 years of age	395	560	1,025	495	2,245
At least one person age 75 or older	195	625	940	315	920
At least one child 6 years old or younger	260	150	410	420	644
Total Households	1,860	2,140	3,590	2,235	10,380

Pinellas Park Florida Analysis of Impediments to Fair Housing

According to the 2012-2016 ACS Survey, the overall poverty rate for Pinellas Park was 15.7%. The poverty rate among African Americans and Hispanics were 35 and 21%, respectively.

Employment opportunities in Pinellas Park and educational levels of the employees make a significant impact on housing affordability and the housing choice of residents. Occupation data indicates that the industries demonstrating the most annual growth are low-to-mid level positions in the medical fields, such as diagnostic medical sonographers, physical therapist assistants and medical assistants; and technology, specifically computer systems analysts and web development. Based on data collected from Enterprise Florida, Inc., both of these industries are demonstrating a greater than three percent annual growth rate.

The unemployment rates have dropped significantly in Pinellas Park. White persons age 16 and over report a 3.7 percent unemployment rate; while Hispanics in the same group reported a 5.4 percent unemployment rate, African Americans reported a 2.4 unemployment rate, and the Asian population in this group reported a 4.7 percent unemployment rate. Detailed data collected from the 2011-2015 American Community Survey is illustrated in Table 1.2.

Table 1.2 Employment Status by Race for Pinellas Park

Employment Status:	White		African American		Hispanic		Asian	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
In Labor Force:	20,167	56.1%	1,216	75.6%	2,447	64%	2,529	72.2%
In Armed Forces	16	0.04%	0	0.0%	0	0.0%	0	0.0%
Civilian:	20,151	56%	1,216	75.6%	2,447	64%	2,529	72.2%
Employed	18,638	51.8%	1,177	73.2%	2,240	58.7%	2,363	67.4%
Unemployed	1,513	4.2%	39	2.4%	207	5.4%	166	4.7%
Not in Labor Force	15,797	43.9%	392	24.4%	1,377	36%	976	27.8%
Total Population 16 Years or Older	35,964	100%	1,608	100%	3,824	100%	3,505	100%

2011-2015 American Community Survey

To further examine the impact of employment proximity relative to housing choice for low- and moderate-income persons, the use and availability of public transportation was analyzed. Pinellas Suncoast Transit Authority (PSTA) provides public transportation services throughout Pinellas County, operating 40 routes including 2 express routes to downtown Tampa. PSTA is filling a need for a growing urban population with the Pinellas Park Transit Center. Located in the middle of Pinellas County, the Center offers full customer service and is a transfer hub for 6 routes. The PSTA provides demand response transportation services (DART) for people who, because of their disability, are unable to independently use the regular, accessible PSTA buses; demand response services are provided wherever regular PSTA bus service is available. PSTA also provides 50 percent reduced fares for adult students, persons 18 years or younger, and senior citizens.

Racial Concentrations within Pinellas Park

In order to identify racial and ethnic concentrations, this study relied on 2017 data set provided by the Federal Financial Institutions Examination Council (FFIEC). Pinellas Park contains all or a portion of 16 census tracts. Minority composition of the tracts ranged from 11 to 39 percent. Based on a review of the data below, the City could not identify significant geographic concentrations of any minority residents. Nor was there a high correlation between lower incomes and high minority populations.

Tract Code	% Below Poverty Line	Tract Median Family Income %	Tract Population	Minority Population		American Indian		Asian/ Hawaiian/ Pacific Islander		African American		Hispanic		Other Population/ Two or More Races	
				#	%	#	%	#	%	#	%	#	%	#	%
245.13	8.14	83.76	3377	378	11%	0	0%	28	1%	154	5%	196	6%	0	0%
250.11	4.91	139.3	5411	832	15%	0	0%	296	5%	133	2%	308	6%	95	2%
249.06	16.7	90.46	3565	643	18%	14	0%	33	1%	219	6%	331	9%	46	1%
248.01	14.3	89.18	4568	845	18%	37	1%	367	8%	19	0%	312	7%	110	2%
245.12	16	90.49	3290	646	20%	7	0%	259	8%	68	2%	312	9%	0	0%
249.01	9.8	98.09	5671	1186	21%	13	0%	674	12%	119	2%	252	4%	128	2%
250.14	8.23	112.8	4742	1072	23%	7	0%	488	10%	28	1%	353	7%	196	4%
246.01	14.1	95.86	3610	825	23%	0	0%	358	10%	83	2%	330	9%	54	1%
249.05	10.9	99.13	6282	1499	24%	0	0%	575	9%	178	3%	698	11%	48	1%
250.09	10.9	101.3	3655	931	25%	10	0%	256	7%	224	6%	388	11%	53	1%
247.01	31.6	57.96	3381	867	26%	0	0%	364	11%	124	4%	250	7%	129	4%
250.04	16.9	84.86	6106	1639	27%	103	2%	516	8%	288	5%	641	10%	91	1%
249.02	27.8	60.34	6488	1870	29%	23	0%	505	8%	307	5%	832	13%	203	3%
245.05	13.4	89.61	7705	2224	29%	42	1%	780	10%	155	2%	833	11%	414	5%
248.03	16.2	67.89	2616	834	32%	0	0%	316	12%	202	8%	316	12%	0	0%
249.04	16.7	90.88	3702	1435	39%	0	0%	587	16%	140	4%	576	16%	132	4%

Existing Housing Stock

Within the jurisdiction there are a total of 23,848 residential housing units with the majority being single family unit structures. The number of units increased by 8.4% since 2000 (Census 2000). Data provided by the 2012-2016 American Community Survey (ACS) indicates that that the jurisdiction’s primary housing tenure is comprised mainly by homeowners, as opposed to renters, with more than two times as many owner units than renter units. Among the approximately 20,942 occupied housing units in Pinellas Park, an estimated 65% are owner occupied and 34.9% are renter occupied. An estimated 2,906 or 13.8% of housing units were vacant.

An estimated 14,482 housing units (60.7%) are single family; 5,154 (21.6%) are multi-family properties. Of the multi-family properties, approximately 5.5% or 1,322 units are located on properties of 20 units or more. According to the 2012-2016 ACS, an approximate 37.9% of the housing units have 3 or more bedrooms and 62% have two bedrooms or less.

Property Type	Number	%
1-unit detached structure	13,017	56%
1-unit, attached structure	1,465	6%
2-4 units	1,166	5%
5-19 units	2,666	12%
20 or more units	1,322	6%
Mobile Home, boat, RV, van, etc.	3,443	15%
Total	23,079	100%

Units by Number of Bedrooms	Owners		Renters	
	Number	%	Number	%
No bedroom	111	1%	117	2%
1 bedroom	661	5%	1,436	23%
2 bedrooms	6,490	46%	3,121	50%
3 or more bedrooms	6,744	48%	1,526	25%
Total	14,006	100%	6,200	100%

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	957	7%	638	10%
1980-1999	4,068	29%	2,414	39%
1950-1979	8,870	63%	3,058	49%
Before 1950	111	1%	90	1%
Total	14,006	100%	6,200	99%

Disproportionate Housing Needs

HUD received a special tabulation of data, Comprehensive Housing Affordability Strategy (CHAS), from the U.S. Census Bureau specifically designed to help jurisdictions with the development of the Consolidated Plan. HUD uses some of these data in allocation formulas for distributing funds to local jurisdictions. Part of this data set addresses quality of housing stock and estimates the number of units that have housing problems. HUD considers a unit to have a housing problem if it meets one of the following criteria.

- Overcrowded: A unit that has more than one person per room is considered overcrowded.
- Cost Burdened: A unit where the household pays more than 30% of its income on housing costs has a cost burden. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payment, taxes, insurance, and utilities. Cost burden is the most common housing problem.
- Without complete kitchen or plumbing facilities

As defined by HUD, a disproportionate housing need exists for a specific racial or ethnic group if the percentage of that racial or ethnic group’s households within a particular category of need is at least 10% higher than found for the category as a whole. The CHAS data below reveals that African Americans and Native Americans are considered to have a disproportionate level of housing need. However, it should be noted that given the small size of the population, it is difficult to draw any meaningful conclusion.

Housing Cost as a Percent of Income	<30%		30-50%		>50%	
	#	%	#	%	#	%
Jurisdiction as a whole	12,685	64%	3,985	20%	3,170	16%
White	10,774	65%	3,200	19%	2,480	15%
Black / African American	200	37%	205	38%	135	25%
Asian	595	67%	220	25%	70	8%
Native American	34	40%	30	36%	20	24%
Pacific Islander	0	0%	0	0%	0	0%
Hispanic	1,000	59%	260	15%	435	26%

Pinellas Park Florida Analysis of Impediments to Fair Housing

0-30% Median Income Households	Problem	No Problem	Percent
Jurisdiction as a whole	1,265	235	84%
White	1,025	180	85%
Black / African American	45	0	100%
Asian	10	0	100%
American Indian, Alaska Native	20	4	83%
Pacific Islander	0	0	0%
Hispanic	145	50	74%
30-50% Median Income Households	Problem	No Problem	Percent
Jurisdiction as a whole	1,655	485	77%
White	1,155	370	76%
Black / African American	150	0	100%
Asian	45	15	75%
American Indian, Alaska Native	0	0	0%
Pacific Islander	0	0	0%
Hispanic	305	100	75%
50-80% Median Income Households	Problem	No Problem	Percent
Jurisdiction as a whole	2,155	1,435	60%
White	1,790	1,230	59%
Black / African American	75	0	100%
Asian	115	80	59%
American Indian, Alaska Native	0	10	0%
Pacific Islander	0	0	0%
Hispanic	160	105	60%
80-100% Median Income Households	Problem	No Problem	Percent
Jurisdiction as a whole	1,000	1,240	45%
White	665	995	40%
Black / African American	29	65	31%
Asian	105	35	75%
American Indian, Alaska Native	30	15	67%
Pacific Islander	0	0	0%
Hispanic	130	120	52%

Impediments to Fair Housing Choice

The analysis of impediments is divided into three sections: the public sector, private sector, and the public-private sector. The public sector analysis reviews local policies and procedures that regulate, monitor, or otherwise impact rental, sales, and property insurance practices. These policies can play a significant role in limiting or promoting fair housing choice. The private sector analysis examines impediments within the private marketplace, including actions of landlords, property managers, real estate agents, lenders, and other parties involved in the provision of housing. The public-private sector analysis focuses on areas of fair housing that are provided through a partnership of both the public and private sector, including enforcement, education, and outreach.

The State of Florida and Pinellas County have enacted fair housing laws that are substantially equivalent to the federal Fair Housing Act, Title VIII of the Civil Rights Act of 1968, as amended. Both the State (Florida Civil Rights Act (ss. 760.01-760.11) and the Fair Housing Act (ss. 760-20-760.37)), and Pinellas County (Chapter 70, Section 103, of the Pinellas County Code) disallow the same activities prohibited under the federal Act. Pinellas County Code has been amended to include protection to additional classes based on sexual orientation in 2008, and gender identity in 2013, and applies to all territory within the legal boundaries of Pinellas County, Florida, including all unincorporated and incorporated areas.

Public Sector Impediments

An analysis of impediments would not be complete without examining the actions within in the public sector that have an effect on fair housing choice. Government policies and procedures that regulate, monitor, or otherwise impact rental, sales, and property insurance practices can play a significant role in promoting fair housing choice.

Zoning and Building Codes

Zoning ordinances, building codes, and other local policies that serve the public good can have disparate impacts on the housing choice of the protected classes. For example, some state and local governments have enacted laws that limit or exclude housing facilities for persons with disabilities or homeless people from certain residential areas. The Department of Justice and HUD take the

position, and most courts that have addressed the issue agree, that density restrictions are generally inconsistent with the Fair Housing Act.

Zoning

Zoning ordinances regulate how property can be utilized, maintain the character of a neighborhood and provide for orderly growth. Zoning ordinances with a single-family zoning district must contain a definition of family. The definition should not be written to exclude certain family members, families which are not biologically related, or are non-traditional, or have a disparate impact on one of the protected classes. The ordinance of Pinellas Park defines “family” as follows:

FAMILY. One (1) or more persons occupying a single dwelling unit as a single housekeeping unit, provided that unless all members are related by law, blood, adoption, legal guardianship, or marriage, or are disabled as defined by federal law, no such family shall contain over four (4) persons, exclusive of domestic servants employed on the premises.

The updates to the Fair Housing Act in 1988 were intended, in part, to prohibit the application of special requirements through land-use regulations, restrictive covenants, and conditional or special use permits that have the effect of limiting the ability of persons with disabilities to live in the residence of their choice in the community. This includes regulation and licensing requirements for group homes. The majority of group homes for persons with disabilities are subject to state regulations intended to protect the health and safety of their residents. HUD has found licensing requirements are necessary and serve a legitimate purpose. Local decision makers must recognize not all individuals with disabilities living in group home settings desire or need the same level of services or protection and requests for reasonable accommodation should be honored where appropriate. After reviewing the following definitions included within the zoning ordinance regarding facilities licensed by the State of Florida, it is determined that the definitions would not serve as an impediment to fair housing choice.

COMMUNITY RESIDENTIAL HOME. A "Dwelling" licensed by the State of Florida to serve persons with disabilities as defined by Federal Law, as well as clients of the Florida Department of Elderly Affairs, the Florida Agency for Persons with Disabilities, the Florida Department of Juvenile Justice, the

Florida Department of Children and Family Services, or the Agency for Health Care Administration, where clients are not a danger to themselves or others, do not suffer from "Acute Mental Crisis", and are not actively using drugs or exhibiting drug or alcohol dependency. A Community Residential Home provides a living environment for unrelated residents who operate as the functional equivalent of a "Family", including such supervision and care by supportive staff as may be necessary to meet the physical, emotional, and social needs of the residents. This term includes foster homes, and Adult Family Care Homes and is exclusive of all other State of Florida Licensed Facilities defined herein. The establishment of community residential homes shall be as propounded in F.S. ch. 419, as it may be amended from time to time. A Planned Residential Community means a planned unit development of a minimum of eight (8) acres and has amenities that are designed to serve residents with a developmental disability as defined in F.S. § 393.063 but that shall provide housing options for other individuals. The community shall provide choices with regard to housing arrangements, support providers, and activities. The residents' freedom of movement within and outside the community may not be restricted. For the purposes of this paragraph, the City approval must be based on criteria that include, but are not limited to, compliance with appropriate land use, zoning, and building codes. A planned residential community may contain two (2) or more community residential homes that are contiguous to each other and the City may not impose proximity limitations between homes within a planned residential community if such limitations are based solely on the types of residents anticipated to be living in the community. A planned residential community may not be located within a ten-mile radius of any other planned residential community.

DOMESTIC VIOLENCE CENTER. A facility certified by the Department of Children and Family Services as a center to receive and house persons who are victims of domestic violence pursuant to F.S. § 39.905.

OFFENDER HALFWAY HOUSE. A residential facility licensed by the State of Florida for the constant supervision of criminal offenders as part of a probation or court-ordered requirement.

RESIDENTIAL CARE FACILITY. A residential facility licensed by the State of Florida to provide any combination of nursing care, injury or illness rehabilitation, personal services, community re-entry training, aids for independent living, or counseling, but not medical services, to persons with disabilities as defined by Federal Law, as well as clients of the Florida Department of Elderly Affairs, the Florida Agency for Persons with Disabilities, the Florida Department of Children and Family Services, or the Agency for Health Care Administration, which clients are not of danger to themselves or others, are not suffering from "Acute Mental Crisis", and are not actively using drugs or exhibiting drug or alcohol dependency. Examples include facilities typically referred to as nursing homes, convalescent homes, and assisted living facilities. This term does not include hospitals licensed under F.S. ch. 395, as may be amended from time to time, or any federally operated hospital facility.

SHELTER HOME. A residential facility licensed by the State of Florida, to provide temporary, short-term care and twenty-four-hour supervision to no more than five (5) clients of the Florida Department of Children and Family Services, which are not of danger to themselves or others, are not suffering from "Acute Mental Crisis", and are not actively using drugs or exhibiting drug or alcohol dependency.

RESIDENTIAL TREATMENT FACILITY. A State-supported and licensed facility providing a comprehensive treatment program for mentally ill individuals in a community based setting.

Building Codes

Building codes provide minimum standards for the design, construction, and use of buildings to protect public health and safety. These regulations are essential to protect the health and safety of citizens and the general welfare of the community.

While building codes have positive contributions, they often contribute to increased construction costs. Codes that require certain amenities or setbacks can affect the feasibility of providing low- and moderate-income housing development. These requirements may serve as an impediment to fair housing choice if the low-income population consists primarily of protected classes, such as racial minorities. Upon review of the building codes used by the City, it is determined that the codes do not serve as an impediment to fair housing choice.

Municipal Services

The City provides a number of municipal services to its residents, including the following that were assessed for potential impediments to fair housing choice. The City did not identify any potential impediments.

- Police Department - The Police Department, with 106 highly trained officers, as well as technicians, and support staff, is very active in crime prevention and community policing. There are four substations located throughout the city to ensure the best protection possible.
- Fire Department - The Fire Department has five stations to allow fast response time anywhere in the city. The Department, employing 76 full-time, certified firefighters, paramedics, as well as support staff, also provides fire prevention programs and participates in Pinellas County's Hazardous Materials Response Team.
- Parks and Recreation - The city maintains numerous parks and recreational facilities. The 16 parks in the city range from small, community parks to large, multi-purpose locations suitable for sporting events, horseback riding, family reunions, and many other activities. The Recreation Division has multiple facilities providing services such as after school play camp, two adult fitness centers, a pool, and children's summer programs. Recreation also offers a variety of classes, such as American Red Cross Water Safety courses, martial arts, and painting.
- Recycling - The city recognizes the need to protect the environment. Pinellas Park employs a Recycling Manager to coordinate efforts between the city, residents, local businesses, and the county recycling program. The city also provides curbside pick-up to facilitate these efforts.
- Library - The latest Barbara S. Ponce Public Library facility, which opened to the public in early April of 2001, is a community-oriented library that provides numerous resources.

The Library, in addition to its many fiction and personal interest books, provides a large reference collection, CD-ROM databases, and Internet access for patrons as well as the reference staff. The Library also offers magazines, books on tape, videos, and programs designed for all ages. The Barbara S. Ponce Library, as a member of the Pinellas Public Library Cooperative, has access to resources throughout the area in order to best serve the needs of area residents.

- Community Development - The Community Development Department is responsible for recruiting new businesses, giving personalized assistance in finding locations, real estate, and business financing, helping existing businesses to grow, attracting new residential development, actively assisting in revitalization of more mature residential communities. They also act as expeditors with city agencies and maintain an advocacy role to solve inter-district problems. In addition, the Community Development Department provides planning, zoning, and building development services that administer land use and zoning, compliance with the building codes, the Federal Flood insurance program, grant management and applications, and performs long range community planning.
- Community Redevelopment - The Community Redevelopment Agency concentrates on downtown development issues and the promotion of businesses within the commercial district.

Private Sector Impediments

Discrimination is the most common form of impediments to fair housing choice within the private sector. Discrimination exists if a tenant, prospective tenant or homebuyer is treated differently than others on the basis of belonging to one of the protected classes. This may involve refusing to rent or sell to someone, or doing so under different terms and conditions. Discrimination can be found in many areas of the housing market, including but not limited to the following.

- The sale and rental of housing and real estate practices such as blockbusting, deed restrictions, trust or lease provisions, conversions of apartments to all-adult occupancy, inaccessible design, or management firm “occupancy quotas”
- Banking and insurance policies and practices pertaining to the financing, sale, purchase, rehabilitation, and rental of housing that may affect the achievement of fair housing choice
- The discriminatory provision of mortgage brokerage services

Housing discrimination also includes the refusal to make a reasonable accommodation for a person with a disability, such as waiving a no-pets policy for a service animal or allowing an alteration to the unit. Based on the number of complaints received by HUD, the most common forms of discrimination, nationwide, include refusal to rent a dwelling and disparate terms, conditions, and privileges associated with renting or sale of a housing unit. More than half of discrimination complaints were based on disability (58.5%) while the second most cited basis was race (25.7%). These statistics are based on the number of complaints received. Actual discrimination may differ due to lack of reporting for certain types of discrimination.

National Housing Discrimination Complaints in FY 2016

Issue	Number of Complaints	Percentage of Complaints
Discriminatory terms, conditions, privileges, or services and facilities	5,859	69.9%
Failure to make reasonable accommodation	3,376	40.3%
Discriminatory refusal to rent	2,343	27.9%
Discriminatory acts under Section 818 (coercion, etc.)	1,424	17.0%
Discriminatory advertising, statements and notices	877	10.5%
Otherwise deny or make housing unavailable	798	9.5%
Other discriminatory acts	475	5.7%
Discriminatory financing (includes real estate transactions)	253	3.0%
Failure to permit reasonable modification	191	2.3%
False denial or representation of availability	177	2.1%
Discriminatory refusal to sell	162	1.9%
Non-compliance with design and construction requirements	67	0.8%
Steering	74	0.9%
Discriminatory brokerage service	61	0.7%
Using ordinances to discriminate in zoning and land use	24	0.3%
Redlining	9	0.1%
Blockbusting	8	0.1%
Discriminatory acts under Section 901 (criminal)	7	0.1%
Refusing to provide insurance	4	0.0%
Total	8,385	100%

Source: HUD Enforcement Management System (HEMS)

National Housing Discrimination Complaints by Basis in FY 2016

Basis for Discrimination	2016	
	#	%
Disability	4,908	58.5
Race	2,154	25.7
Familial Status	882	10.5
Sex	800	9.5
National Origin	917	10.9
Religion	204	2.4
Color	143	1.7
Retaliation	785	9.4
Total Complaints Filed	8,385	100

Pinellas Park Florida Analysis of Impediments to Fair Housing

The Pinellas County Department of Human Rights is a substantially equivalent fair housing provider who handles discrimination complaints within Pinellas County. The following data is based on complaints received from 2011 to 2015:

- Received two hundred nineteen (219) fair housing complaints and processed two hundred thirteen (213) cases to closure. Complaints can have multiple bases, making the total herein higher than the number of total cases.
- The statistics show an overwhelming number (150) or 68.0 percent of complaints filed based on disability discrimination. Regarding the alleged harms comprising these filings, the denial of a reasonable accommodation was the most commonly cited harm, with one hundred sixteen (116) complaints filed on this basis.
- Thirty nine complaints (39) or 17.0 percent were filed based on Race
- Seventeen (17) or 7.0 percent were filed based on National Origin
- Fourteen (14) or 6.0 percent were based on Familial Status
- Twenty three (23) or 10.5 percent were based on Gender
- Seven (7) or 3.0 percent were filed on the basis of Religion
- Ten (10) complaints filed based on Sexual Orientation. Regarding harms alleged under the local basis of Sexual Orientation, there were seven (7) allegations of harassment and intimidation, and five (5) allegations regarding the imposition of different terms and conditions.
- None on Gender Identity.
- After denial of reasonable accommodation, the most common harms were the alleged imposition of different terms and conditions, with one hundred thirteen (113) instances, sixty four (64) allegations of harassment, twenty six (26) allegations of a refusal to rent, and twenty three (23) allegations of discriminatory advertising.

Lenders and Lending Services

Lenders, in the past, routinely refused loans to sections of a community in a practice known as redlining. Federal initiatives, such as the Community Reinvestment Act, have curtailed redlining and made credit more readily available to these communities. Historically, minority consumers often have unequal access to loans at the best terms based on credit history, income, and other risk factors. As part of the analysis, Pinellas Park analyzed data reported by lending institutions per the Home Mortgage Disclosure Act for the 2016 year. HMDA data cannot be used to "prove" discrimination by banks and other lending institutions, but the data can be analyzed to determine discriminatory patterns or trends.

Below is a table that summarizes loan actions taken by lenders for the purchase of single-family homes. The information is presented by race of the borrower. Asians had a denial rate (24%) twice as high as the overall rate (12%). The denial rate for Hispanics (15%) was slightly higher than the overall rate.

Loan Action	American Indian	Asian	Black	Pacific Islander	White	No Info	NA	Grand Total
Origination	4	59	45	3	795	73	5	984
Approved Not Accepted		2	2		25	7		36
Denied	1	22	4		115	19		161
Withdrawn		10	2		104	8	1	125
Incomplete			2	1	16	6		25
Grand Total	5	93	55	4	1,055	113	6	1,331

Denial Rate	20%	24%	7%	0%	11%	17%	0%	12%
Origination Rate	80%	63%	82%	75%	75%	65%	83%	74%

Loan Action	Hispanic	Not Hispanic	No Info	Not Applicable	Grand Total
Origination	107	806	66	5	984
Approved Not Accepted	3	27	6		36
Denied	23	124	14		161
Withdrawn	16	100	8	1	125
Incomplete	2	15	8		25
Grand Total	151	1,072	102	6	1,331

Pinellas Park Florida Analysis of Impediments to Fair Housing

Denial Rate	15%	12%	14%	0%	12%
Origination Rate	71%	75%	65%	83%	74%

Below is a table that summarizes loan actions taken by lenders for the purchase of single-family homes by census tract. The City was not able to discern any overall patterns based on the geography of approvals and denial rates.

Census Tract	Originated	Approved Not Accepted	Denied	Grand Total	Denial Rate	Origination Rate
245.05	78	3	11	103	11%	76%
245.12	60	4	1	73	1%	82%
245.13	40	4	2	50	4%	80%
246.01	30	2	9	44	20%	68%
247.01	27	1	10	41	24%	66%
248.01	78	0	8	99	8%	79%
248.03	24	1	5	33	15%	73%
249.01	70	4	21	105	20%	67%
249.02	105	2	11	135	8%	78%
249.04	56	3	11	81	14%	69%
249.05	86	4	21	127	17%	68%
249.06	49	1	14	76	18%	64%
250.04	58	1	11	79	14%	73%
250.09	61	1	5	75	7%	81%
250.11	96	4	9	123	7%	78%
250.14	66	1	12	87	14%	76%
Grand Total	984	36	161	1331	12%	74%

It is a violation of the Fair Housing Act to impose different terms or conditions on a loan, such as different interest rates, points, or fees based on a person's race, color, national origin, religion, sex, familial status or disability. Loans with high interest rates are one way of providing disparate treatment. The table below summarizes single-family purchase originations with reported rate spreads. Census Tract 249.02 appears to be an outlier in that it has a significantly higher number of high cost loans compared to the other tracts.

Pinellas Park Florida Analysis of Impediments to Fair Housing

Loans with Reported Rate Spread	American Indian	Asian	Black	White	No Info	Grand Total
245.05		1		4		5
245.12				3		3
245.13				1		1
246.01	1	1		8		10
247.01			1	4		5
248.01				6	1	7
248.03				3		3
249.01				9		9
249.02		3	5	13	1	22
249.04		1		6		7
249.05			2	11	1	14
249.06			1	4		5
250.04				5		5
250.09				3	1	4
250.11				8		8
250.14				5		5
Grand Total	1	6	9	93	4	113

Real Estate Services

The services of real estate professionals are critical in the provision of fair housing choice. Homebuyers rely heavily on the professional’s expertise of the local market. Racial steering is the practice of limiting a buyer’s choice, through comments or actions, to specific neighborhoods based on race or national origin. It is often difficult for housing consumers to detect steering in that it can often be overlooked as poor service. Per state licensing requirements, Florida real estate agents must meet educational requirements that includes a fair housing component. In addition, Pinellas County Department of Human Rights provides numerous training sessions for agents. The educational requirements include initial work before receiving a license and continuing education as well. Based on a review of the data and in consultation with local fair housing providers, the City has not identified steering or discrimination on the part of real estate service providers as an impediment.

Public and Private Sector

Fair Housing Enforcement

Effective fair housing enforcement lies at the heart of a comprehensive program to affirmatively further fair housing. Testing has proven to be one of the most effective ways to combat discrimination and enforce fair housing choice. In most communities, this role is undertaken by fair housing advocacy organizations whose sole mission is to promote fair housing choice. In the local region, the Pinellas County Department of Human Rights, Bay Area Legal Services, and Gulf Coast Legal Services provide fair housing advocacy. Pinellas County is one of only six counties in Florida to receive a “substantial equivalence” designation from HUD. This designation signifies that the County has the capacity to provide fair housing enforcement at the local level.

Informational Programs

Aggressive informational programs have shown to be effective in encouraging persons who experience discrimination to report it.

The lack of effective informational programs creates an impediment to equal housing opportunity. A 2002 HUD study found seventeen percent of individuals who believed they had experienced housing discrimination took some action in response. Of those who took action, one percent said they reported the discrimination to a government agency. Recent studies have shown discrimination based on national origin is largely underreported, specifically by Latinos, Asian Americans, and Native Americans. These studies suggest several reasons for underreporting of housing discrimination. The reasons are listed below.

- Housing discrimination is often not readily identifiable by consumers
- Language barriers and other cultural issues, including immigration status, hesitancy to challenge authority, and a general lack of faith in the justice system
- Low expectations of a good result. Two-thirds of those who expected filing a complaint would bring a good outcome said they would be very likely to file one if they were discriminated against, compared to less than one-fourth of those who did not anticipate good results

Pinellas Park Florida Analysis of Impediments to Fair Housing

Pinellas County Department of Human Rights (PCOHR) provides fair housing education, training, outreach, and awareness initiatives. Staff provides monthly training sessions to PRO, the Pinellas Realtor Organization within Pinellas County, thereby exponentially increasing its reach into the community. Realtors, property managers and public assistance housing providers are the first line of defense in preventing or perpetuating discrimination. Training is also offered to municipal entities, homeowner and condominium Associations, and local private businesses.

Persons who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English are defined as Limited English Proficient (LEP) and may be entitled to language assistance with respect to participating in federally funded programs. Language for LEP persons can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by federally funded programs and activities. Per Section 601 of Title VI of the Civil Rights Act of 1964, recipients of federal financial assistance have an obligation to reduce language barriers that can preclude meaningful access by LEP persons to important government programs, services, and activities.

Summary of Impediments to Fair Housing Choice

Pinellas Park, as a recipient of federal CDBG funds, must take appropriate actions to overcome the effects of the impediments identified within this plan and maintain records reflecting the analysis and actions in this regard. Pinellas Park proposes to undertake the following actions to affirmatively further fair housing choice within its jurisdiction.

Impediment #1: Lack of Public Awareness

There is evidence a substantial number of persons who experience discrimination do not report. Among the reasons for lack of reporting include the inability to identify discrimination and belief that nothing will result from the report. In some cases, limited English proficiency plays a role as well. The largest impediment to fair housing choice is lack of consumer education regarding fair housing rights. There is a need for a multi-faceted approach that effectively reaches all affected parties, including housing consumers, housing professionals and landlords, government officials, and public advocacy groups.

Recommendation #1-1: It is recommended that the City maintain fair housing information, including how to file a fair housing complaint, on their web site.

Recommendation #1-2: It is recommended that the City seek to increase the availability of information for non-English speaking populations so that all population groups and ethnic subgroups to ensure that all citizens understand their rights. This could include fair housing brochures printed in Spanish, bi-lingual landlords and translators available by appointment at various City offices. Materials can be produced and disseminated in print and through electronic and broadcast outlets. Two specific groups that were identified as potentially underserved are Vietnamese and Laotian.

Recommendation #1-3: It is recommended that the City commit to implementing homebuyer education classes at various locations, including the public library, the senior center, and recreation centers.

Impediment #2: Need for Greater Coordination

Given the limited amount of resources available to the City, a successful approach to affirmatively furthering fair housing will need involve other like-minded organizations within the region.

Pinellas Park Florida Analysis of Impediments to Fair Housing

Coordination is needed among government agencies, advocacy groups, and private market providers, such as landlords, property managers, and realtors.

Recommendation #2-1: It is recommended that the City of Pinellas Park officially designate a person as the City's Fair Housing Officer. This person will coordinate all fair housing actions and issues that arise through the City's programs.

Recommendation #2-2: It is recommended that the City of Pinellas Park will join and actively participate in monthly meetings of the Tampa Bay Fair Housing Consortium, which encompasses the greater Tampa Bay area of Pinellas, Hillsborough, and Pasco counties. The City will also seek to coordinate its efforts to affirmatively further fair housing with other local stakeholders, including the Pinellas County Department of Human Rights, the Pinellas County Housing Authority, the Housing Finance Authority of Pinellas County, the Pinellas County Economic Council, and the Countywide Planning Authority.

Recommendation #2-3: It is recommended that the City continue refining the referral process for low- and moderate-income individuals and families in need of housing assistance through Pinellas County's HOME and SHIP programs.

Recordkeeping

Pinellas Park will maintain the following records regarding fair housing and equal opportunity.

- Documentation of the analysis of impediments and actions the recipient has carried out with its housing and community development and other resources to remedy or ameliorate impediments to fair housing choice in the recipient's community.
- Data on the extent to which each racial and ethnic group and single-headed household (by gender of household head) have applied for, participated in, or benefited from, any program or activity funded in whole, or in part, with CDBG funds (the data will only be used to further investigation as to compliance with nondiscrimination requirements).
- Data on employment in the categories prescribed on the Equal Employment Opportunity Commission's EEO-4 form, and documentation of any actions undertaken to assure equal employment opportunities to all persons regardless of race, color, national origin, sex or disability.

Pinellas Park Florida Analysis of Impediments to Fair Housing

- Data indicating the race and ethnicity of households (and gender of single-head of households) displaced as a result of CDBG funded activities and address and census tract of the housing unit to which each displaced household relocated (the data will only be used for further investigation as to compliance with nondiscrimination requirements).
- Documentation of actions undertaken to meet the requirements of Sec. 570.607(b) which implements section 3 of the Housing Development Act of 1968, as amended (12 U.S.C. 1701U) relative to the hiring and training of low- and moderate-income persons and the use of local businesses.
- Data indicating the racial/ethnic character of each business entity receiving a contract or subcontract of \$25,000 or more paid, or to be paid, with CDBG funds (this information will include the amount of the contract or subcontract, and documentation of recipient's affirmative steps to assure minority business and women's business enterprises have an equal opportunity to obtain or compete for contracts and subcontracts as sources of supplies, equipment, construction and services).
- If applicable, documentation of affirmative action measures the recipient has taken to overcome prior discrimination, if the courts or HUD found the recipient previously discriminated against persons on the ground of race, color, national origin or sex in administering a program or activity funded in whole, or in part, with CDBG funds.