

Fair Housing Office Hour Session 15, General Questions for Affirmatively Furthering Fair Housing Office Hours, Tuesday, October 11, 2022

Paul Turner: Again, thank you for joining our fair housing webinar session on general questions. My name is Paul Turner, and I'll be your host for today's webinar. We are joined by our experts from Enterprise Community Partners and Abt Associates, who will be presenting and taking your questions. We are glad you have joined us today.

We will start by reviewing some logistical items and move on to the open-question period, where you can type in questions for our experts. We will answer as many questions as we have time to address today.

First, a bit about our platform; we are using Zoom today to facilitate our event. We are recording this session and we'll make the recording available to all registrants in a few weeks. We will also share an email survey in the coming weeks to get your feedback on how to improve these sessions. We encourage you to complete that survey when you receive it.

If you've not used Zoom before, you will see that the lower center portion of the screen contains the controls. Chat has been disabled and all participant audio has been muted. In order to ask your question, please click the Q&A button in the Zoom menu as shown on the screen. We will be answering questions at the end of the presentation.

I'll now pass it to our presenters, Andrea Juracek, Director with Enterprise Community Partners and Lauren Walker Lee, Senior Associate with Abt Associates. Thank you both so much, and please take it away.

Lauren Walker Lee: Good afternoon, everyone. We welcome you to HUD's Affirmatively Furthering Fair Housing Office Hours. As Paul mentioned, I am Lauren Walker Lee, a Senior Associate with Abt Associates. And I'm going to let Andrea introduce herself.

Andrea Juracek: Good afternoon, everyone. I'm Andrea Juracek, Director of Fair Housing and Public Housing Revisioning with Enterprise Community Partners.

Lauren Walker Lee: Andrea and I are HUD contracted technical assistance providers. We are not employees of HUD. And the views we share with you today are based on our experience as fair housing practitioners and technical assistance providers.

Most of the folks that have joined previous calls are grantees of the U.S. Department of Housing and Urban Development. As HUD grantees, you must regularly certify compliance with the Fair Housing Act's Affirmatively Furthering Fair Housing, or AFFH, requirement.

The Fair Housing Act prohibits among other things, discrimination in the sale, rental, and financing of dwellings and in other housing related transactions, because of race, color, religion, sex, familial status, national origin, or disability.

It also extends beyond this non-discrimination mandate, requiring HUD to administer its programs and activities relating to housing and urban development in a manner that affirmatively furthers the purposes of the act.

Courts have found that this requires HUD grantees to go beyond simply avoiding and barring discriminatory practices. HUD grantees must take meaningful steps to affirmatively further the Fair Housing Act's objectives, such as acting to desegregate communities.

In the years prior to 2015, HUD had implemented the AFFH mandate by requiring each grantee to complete an Analysis of Impediments to Fair Housing Choice, or AI. It did not have a process in place to systematically verify compliance.

The 2015 AFFH rule established a process by which grantees had to conduct a more extensive analysis of local fair housing concerns, called an Assessment of Fair Housing or an AFH, commit to specific steps to remedy them and then submit that AFH to HUD for review.

It also created a regulatory definition of the AFFH requirement to clarify the substantive expectations HUD has for grantees. In the summer of 2020, the prior administration replaced the 2015 AFFH rule with one called Preserving Neighborhood and Community Choice, without going through the required notice and comment process.

That rule not only rescinded the 2015 AFFH rule but also redefined the term fair housing as well as the Fair Housing Act's AFFH obligation to eliminate much of HUD grantees responsibility to address fair housing issues.

On June 10th, 2021, HUD published in the federal register, an Interim Final Rule or IFR, entitled restoring Affirmatively Furthering Fair Housing definitions and certifications to restore meaningful implementation of the Fair Housing Act's AFFH requirement.

The IFR rescinds the 2020 rule but does not restore the 2015 AFFH's rules procedural provisions that govern how HUD grantees conduct fair housing planning and how HUD would provide review.

The IFR does not require any particular fair housing planning process, so long as grantees can meaningfully certify that they are meeting the Fair Housing Act's AFFH obligation.

After the IFR becomes effective, HUD will provide technical assistance and support for grantees that want help with fair housing planning to support their certifications.

Consistent with their statutory obligation under the Fair Housing Act, the IFR requires HUD grantees to certify that they will affirmatively further fair housing, which is defined as taking meaningful actions to address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with those that are truly integrated and balanced, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

The IFR does not require HUD grantees to participate in the fair housing planning process. However, HUD anticipates that many grantees may want to engage in an established form of fair housing planning, and HUD will provide assistance to help its grantees undertake these efforts.

While not required to do so, grantees may choose to continue to engage in familiar fair housing planning processes, such as implementing a completed AI or AFH, updating an existing AI or AFH, or conducting a new AI or AFH.

Grantees may also choose to engage in other means of fair housing plannings that meaningfully supports their certification. Now, the question on many of your minds is: When will HUD issue a new rule?

What we have heard is that the new proposed fair housing planning rule is currently at the Office of Management and Budget. And once reported out, there will be the required period for public comment of up to 60 days. Now, with that, Andrea and I are here to respond to your general questions.

Paul Turner: We have one question in from Doris, which states, "Our last AI was done in 2016, six years ago. What are we required to do to fulfill the fair housing application? Do we need to prepare another AI? Should we wait for the final AFFH rule? Any suggestions."

Lauren Walker Lee: As Andrea shared in the introduction, you're not required to do any of the -- any of the previous forms in terms of an AI, an AFH, or some kind of hybrid element. But you're required to do something.

I do know that it is at the Office of Management and Budget currently, or this is what we've heard by rumor. We don't know when it's going to be reported out. And so it depends where you are in the process about whether you have something that's existing that you have been taking a look at additional data for the last five-year period of having an AFH or an Analysis of Impediments. And whether you're doing that meaningful work to complete something. Andrea, do you have anything you'd like to add to this?

Andrea Juracek: The only thing that I would mention is that usually fair housing plans - Analysis of Impediments previously were updated every five years. So if the AI was done six years ago, you may want to consider at this point -- you know what, as Lauren said, there is no obligation to follow any one particular fair housing planning process. But you may want to consider updating the previous AI or beginning some other type of fair housing analysis, following the interim final rule that's out there now.

Lauren Walker Lee: And I would just add, just taking a look at the question again, the fact that your last one was done in 2016 is I'm hoping that you've been doing some work just with analysis and thinking about what your Action Plan was in that 2016 document, what you've been working on. But I think we've been waiting for quite a while for the new rule to come out. And I wouldn't just stop work, waiting for it to come out.

I see that there's a question. "Will there be time to answer general fair housing questions unrelated to the AFH?" I'm sorry to say that's all we're here for is related to Affirmatively Furthering Fair Housing. And so it's not just the AFH or an AI or a hybrid version. It's that fair housing planning element required by the Fair Housing Act.

Andrea Juracek: Looks like there's another question that was raised in the chat. "Is there a place we can find sample AFH social media posts to use? We don't have a big advertising budget, so this would help." That's a really good question.

You know, when it comes to social media, does the MIT website have -- I'm trying to think of social media specific posts.

Lauren Walker Lee: If I could just jump in, Andrea.

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Andrea Juracek: Sure. Thanks.

Lauren Walker Lee: The National Fair Housing Alliance has some excellent information that's on their website. You can either contact them or see some of the information that they have.

For years, the National Fair Housing Alliance has received contracts from HUD to develop national advertising. And so there's some excellent fair housing posters and other elements that can be used either in print media or shared with TV and radio to support fair housing interests.

Paul Turner: So we have a not a question but just a note that Debbie wanted to point out, which is just a note. But people can track the status of proposed rule on the LMB website at the link, which I will put into the chat now for everyone's access.

Lauren Walker Lee: And thank you to Debbie, who is with the National Fair Housing Alliance and is a great resource in and of herself. And are there any other questions?

Paul Turner: So a question that's come up in the past is, "Can you recommend any fair housing trainings for intake and non-housing staff, development director, grant writer, etc.?"

Andrea Juracek: I would recommend looking to the National Fair Housing Training Academy for that. We can also put that link in the chat. But that is a great resource for a variety of HUD trainings. Lauren, anything else?

Lauren Walker Lee: And though -- in terms of fair housing as well going to the National Fair Housing Alliance, that also has excellent training, I don't think either of these have help with actual grant writing assistance.

Just looking at your list here to see if there's data analysis and planning. I think those two resources are the best. And by taking a look at both of those, especially our contact numbers for both of those organizations on where to find other kinds of training.

Paul Turner: So another question has come, which states, "Is there a person at HUD or another agency that can assist with question that arise with data analysis and planning? For example, statistical analysis, various data resources."

Lauren Walker Lee: I don't have a specific name of a person at HUD. But I think that connecting in on the fair housing -- if Paul or Michelle, if you could put in the link to the HUD web page on AFFH. There is an email address at the bottom of that notice on AFFH requirements that can connect with HUD staff. And [inaudible].

Andrea Juracek: And if -- oh yeah, I was just going to say if you want to ask specific questions on statistical analysis, you can always reach out to someone at the PD&R Team - Policy Development and Research at HUD. They would be able to give you some guidance there as well.

So another question that we have is from Vicky. She states, "We are a new HUD grantee. We just received a Fair Housing Outreach and Education Initiatives grant last year. And the grant year will close 11/30/22. My supervisor indicates an AI or AFH has not been completed in her time here, approximately eight years. What should be our first steps as a new grantee?"

Andrea Juracek: Well, that's a good question. First, well, as a Fair Housing Outreach and Education Initiative grant, you'll of course, want to look to your statement of work. If it's in your statement of work to engage your local jurisdictions in fair housing planning, then I would begin

by reaching out to planning departments, city managers, whoever might be your best contact at your local jurisdiction, building on your relationships, that sort of thing, to get that discussion started.

It can be a large discussion to begin but certainly well worth the time and energy you invest in it. And perhaps -- HUD will be making technical assistance available under the new rule once it is released. And so once that comes out, the local jurisdictions may be able to engage in direct technical assistance to help guide the process.

But you can certainly always direct them to the information that's out there currently via the links that we've put into the chat already and any other resources that you might find helpful. Anything else, Lauren?

Lauren Walker Lee: The only thing that I'd add, it's hard to know as a recipient of an education and outreach grant if you're a non-profit agency, which is oftentimes the case, or whether you actually are within that government entity that is required to do fair housing planning.

If you're not required to do fair housing planning and you are a non-profit agency or a community agency that is doing a new Fair Housing Education and Outreach project, if you've heard there's no fair housing plan that's been done in the last eight years, I would go look at the Consolidated Plan and the fair housing part and also look for the CAPER, which would have also some additional action steps that are in it.

I'd look at the action steps and the Consolidated Plan and also look at the CAPER reporting. That will give you a sense of what has taken place previously, if they have not -- either whether they have done a fair housing plan or not. That will give you a base line.

I always found those very helpful when I was preparing Analysis of Impediments and Assessment of Fair Housing, is to look to see what has been done and what's in the Consolidated Plan. It just helps to guide whatever my efforts were.

Paul Turner: Thanks, Lauren. So another question that has come in, "Until the interim rule becomes final, are we in compliance by responding to the new annual plan format, which includes Analysis of Impediments?"

Lauren Walker Lee: I'm going to need you to ask that question again because I just lost it in the question section.

Paul Turner: No problem. So "Until the interim rule becomes final, are we in compliance by responding to the new annual plan format, which includes Analysis of Impediments?"

Andrea Juracek: My first inclination is to say yes, because the interim final rule does not dictate any one particular form of analysis or fair housing planning that must be undertaken.

Paul Turner: Another question that's come in, "It was mentioned that HUD will provide support to CDBGs. Does HUD have any suggestions online to support CDBGs, such as guidance they provided in the past?"

Lauren Walker Lee: Maybe you can help me understand this question a little bit, Andrea. But CDBG is Community Development Block Grant, so I'm guessing that the question is related to Community Development Block Grant entitlement jurisdictions. I don't think we have any

specific resource recommendations for entitlement jurisdictions other than the AFFH obligations. Do you have anything that you would add, Andrea?

Andrea Juracek: The only thing that I would suggest is contacting your local HUD field office if you feel like you need technical assistance or guidance. There are a number of technical assistance programs set up to assist CDBG entitlement jurisdictions, particularly those around disaster relief or disaster recovery grants. But your HUD field office may be able to connect you with technical assistance depending on what issue or questions you might have.

Paul Turner: We have another question. "What are some great examples of AI and AFH grantees can do?"

Andrea Juracek: So for that I would go to the MIT website. Let me pull that up. Lauren, can you explain that off the top of your head?

Lauren Walker Lee: Sure. And I think that Michele and Paul might have that handy in terms of being able to put that into the link. There's a MIT AFFH website that has excellent resources on Assessment of Fair Housing that have been done and on Action Plans.

I have found that reading through some of these and reading through the Action Plans, gives obvious examples of really good work, and also gives the sense of even some subcontract agreements that have taken place within those different planning processes.

For example, there was one in Philadelphia that they had a subcontract with a disability group in terms of community engagement and disability work.

So that's an excellent site that is an amazing resource to all of the nationwide and being able to take a look at cities and states and counties different jurisdictions and how they've approached the Assessment of Fair Housing. It doesn't have AI. It doesn't have hybrid versions, but it's an excellent resource of Affirmatively Furthering Fair Housing work.

I see a question, and maybe, Paul, you're getting to this, is, "When advertising or sending out newsletters, should we invite people who are not in housing industries to sign up for the NFHTA or National Fair Housing Training Academy classes?"

The National Fair Housing Training Academy does have a lot of classes, which are -- they're enforcement related in terms of just investigating complaints. But there's also other really good things just that are on general subjects that the entire population can benefit from. And I think that the National Fair Housing Alliance may be one of the organizations that has done some of this work.

I think that advertising some of those general topic pieces would be definitely something of interest to people in the community and to people in the housing industry. Once again, National Fair Housing Alliance also has different training and different things that they've done as well that would also be useful to the general public.

And please look to your local fair housing groups. Perhaps Paul and Michelle can put the link in, which is the membership on the National Fair Housing Alliance website. There's a couple of links. One is just the general National Fair Housing Alliance. The other is the membership list, which will help you to locate who your fair housing organization is in your community or in the state or in the region.

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The non-profit fair housing agencies do amazing work in training. You can also -- Paul and Michelle, if you could put the link in on the Fair Housing Assistance Programs, which also have done some excellent training as well, which are under contract with HUD to investigate complaints and other important fair housing works.

And also the field offices for HUD oftentimes do like an annual fair housing organization or publicize what training is taking place in the area. So not just looking to the national sites but looking locally and developing a relationship with people locally as well.

Paul Turner: Thanks, Lauren. Another question that's come in states, "In my state, the state housing authority and city town PHAs are very decentralized, and the local PHAs do not report to the state at all. We do not know nor track their fair housing complaints. Does anyone have a feel if there might be an expectation from HUD that the states may have to report on local fair housing issues or is each entity grantee on their own?"

Andrea Juracek: That's a good question. My first response to that is, so states often are, for instance, Community Development Block Grants grantees themselves from HUD, and they may be intermediary so that they have passthrough funds. So they distribute CDBG funds directly to municipalities or jurisdictions throughout the state.

In which case they -- well, regardless, they would be doing an analysis of fair housing issues across the state to meet their own requirements, their own affirmatively furthering their housing compliance requirements, in which case they would be looking to local jurisdictions, particularly those that they partner with, to attract -- or to look at fair housing complaints that might be coming in in addition to a number of other issues.

So there's a number of mechanisms that could be used to do that. It isn't uncommon for city or town PHAs to be decentralized and not report to a state housing authority or state housing development authority.

But I would think that there would be a state effort at some level to be doing an analysis of fair housing issues that would involve local jurisdictions.

And there's always the opportunity to partner with state housing authority and local jurisdictions and PHAs to create a working group or other models that might be -- that you might want to look to, to get that conversation started as well. Lauren, did I say miss anything?

Lauren Walker Lee: I agree with you completely, Andrea. What I would add to that is, the state is required to do something in terms of fair housing planning and have done either an AI or have done an Assessment of Fair Housing in the past.

Every entitlement jurisdiction is required to affirmatively further fair housing. And this -- we're in a period of hybrid model, so maybe something hasn't been done recently.

So what I loved about the Assessment of Fair Housing, is it really pushed collaboration and not having everybody in silos. It was a beautiful opportunity to look at what was happening at the state level, to look at the jurisdictions surrounding you, so whether it's a number of cities within a county area or just having people not just look at their jurisdictional boundaries.

So once again, if it's not clear -- and then the public housing authority piece, too, that collaboration with public housing authority is also really big. And there are some examples of that on that MIT AFFH website. So take a look at some of those kinds of things.

Once again, if you're not sure what's been done at that state level, I would look at the Consolidated Plan, I'd look up AI or AFFH with that state to see if that's been done in the past. I'd look at the CAPER that the state has to do for their reporting to see what they are reporting on in terms of fair housing planning.

And then to determine what's coming next in terms of collaborative efforts on fair housing, in terms of having to report on complaints, that is something -- I'm not sure what your jurisdiction is or whether you're a public housing authority or whether you're a city, but you can request that information from your local field office of what those complaints are. Those can be broken out by city.

They can be broken out by ZIP Codes. They can be broken out in a number of different areas. I really recommend talking with that field staff to get the level of detail so that you can really see what the protected bases are and also what the result is in terms of whether it was settled, or a reasonable cause or no reasonable cause finding took place. It's really important data that really helps to inform any fair housing plan.

And I do see a question, which maybe you can answer, Andrea, anyone particular at PD&R for data analysis questions. I don't have anyone specifically other than going to their site and going to their contact.

Andrea Juracek: Yeah. Solomon Green, who is now the Principal Deputy Assistant Secretary at PD&R, used to be at Urban Institute and has a very deep understanding and history with data analysis. So he's their Principal Deputy Assistant Secretary in charge of the office, so he may not be the easiest person to reach. But I would think anyone that you reach out to there would be able to direct you to a good person to speak with.

Paul Turner: So another question that has come up in the past is, "Where can we find a list of entities that provide fair housing services?"

Lauren Walker Lee: And I just shared that information. Thanks, Paul. And I'll just take a look at the chat to see if that information was included. The National Fair Housing Alliance has a list of members, which you can see a map on their website of where people are located.

There's also, I'm not sure if it was included in the chat, but the Fair Housing Assistance Program list, which has entities across the United States.

There's also the field offices of HUD. And there's 10 regions for the field offices. And then there's HUD itself. So I think that information has been included in the chat. Let's see here. I see that the member directory is in there. I'm not sure if the Fair Housing Assistance Program -- so I see --

Andrea Juracek: I just put that in.

Lauren Walker Lee: Okay. Great. So that's [inaudible].

Andrea Juracek: Yeah. It's a list on HUD's website.

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Lauren Walker Lee: Yeah.

Paul Turner: So another question that has come up in the past was, "Do you know if the new AFFH can be accomplished along with the five-year Con Plan process? Last time it was almost an additional Con Plan effort to meet all the AFFH requirements."

Andrea Juracek: Yeah, so under the 2015 Affirmatively Furthering Fair Housing rule, it was a separate process from the Consolidated Plan process to complete an Assessment of Fair Housing.

With this interim final rule, there is no additional process that needs to be met or gone through. So with the five-year Con Plan process, you can include or you should be including a fair housing analysis in that. Pretty straightforward. Lauren, do you have anything to add to that?

Lauren Walker Lee: No. I think that would answer the question.

Paul Turner: So we just received a question from Elaina, which states, "Our Analysis of Impediments to Fair Housing Choice is about six years old. Should we proceed to do a new one?"

Lauren Walker Lee: Thanks, Elaina for that question. As we shared, there's flexible options for fair housing planning under the current IFR. So you can do an AI. You can update an AI. You can move to an Assessment of Fair Housing, or you can do a combination of things.

The important thing is that you're doing something meaningful to affirmatively further fair housing. So it's been six years. Usually, Analysis of Impediments were done every five years.

I don't know what you've done during the last couple of years to continue that requirement to affirmatively further fair housing, whether you had been looking at complaint data, whether you've been looking at your Action Plan and the kinds of things that you've been reporting on in your CAPER and what kind of other work that you've been doing.

But doing any preparation, I think, is helpful. Even if the IFR comes out, I don't think that you will regret having done the current kind of analysis. You'll be a step ahead by making sure that you're thinking about fair housing for your entitlement jurisdiction. Anything to add, Andrea?

Andrea Juracek: No. You know, I would just say looking at your local housing market and landscape, especially with the pandemic, we know that a lot of changes took place in the housing market and areas. So depending on your local housing atmosphere, environments, you may want to consider doing even shorter periods between updates. But that's neither -- there's no requirement to do that.

Lauren Walker Lee: This is just an update for those of you that are wondering about when the new rule will be coming out. Thanks Debbie, once again, for putting that information in the link. What the Office of Management and Budget lists is that the new rule was received on June 15th of this year. And it's under review.

And we know that usually that's 90 days, but it's been past that 90 days, so we don't know when that the reporting out will take place. Any other questions? As we're waiting for other questions, I can talk a little bit more about complaint data, but also in previous sessions, we've also talked about fair housing testing that's taken place.

Fair housing testing is also a very important part of understanding what kind of discrimination is taking place in your particular jurisdiction or something larger than your jurisdiction. And

contacting your local organization to find out if any audits have been done on particular protected classes, that can be helpful just to understanding what the incidences of discrimination are.

The Urban Institute has done -- has published some studies for HUD. And each -- every 10 years, they have done something for the last about, I think, 20 or 30 years. And so there's always a national testing results and they're -- I think in the most recent or the one before that, there was a breakout by region, so that gave some very specific information about discriminatory practices.

But it's very helpful, I think, to even include those results in your -- any fair housing process. I think it's very strong evidence of what's taking place. And once again, with that complaint data, is contacting your field office or your Fair Housing Assistance Program, asking for very detailed information on what those complaints are and what the results in terms of the investigation are.

Litigation, as well, taking a look at litigation in your particular area and nationwide to see what kind of new information there is. It looks like there's another question, Paul.

Paul Turner: Thank you. So we have another question that states, "I manage a consortium and they are all working on updating their AI. Their CAPER is due in the next few months. Is the new rule going to affect their CAPER submission / Con Plan? Do they need an amendment?"

Lauren Walker Lee: Do you want me to answer this one, Andrea, or do you want me to jump in?

Andrea Juracek: Yeah. No. I would say no. You should continue with the process that you're on. The Interim Final Rule -- there's no telling until HUD releases the final rule, but it's our understanding that the Interim Final Rule you know, kind of takes precedence. And the fact that it does not require any specific type of planning process or analysis process, I think that this would fulfill the obligations.

Lauren Walker Lee: And I would just add, go ahead, do the CAPER just as Andrea said, finish your Con Plan. And even if the new rule were to be released today, there would be a public comment period, but I would go ahead with your actual reporting.

Paul Turner: So a past question that has come up states, "Regarding neighborhood conditions, we are supposed to focus on improving racially concentrated areas of poverty. Are we supposed to do that?" Sorry the question was a little --

Andrea Juracek: So under the previous assessment fair housing, which was part of the 2015 AFFH rule, there was a requirement to look at factors such as racially or ethnically concentrated areas of poverty or R/ECAPs. Those were to be included in the analysis.

And then there were goals and strategies that had to be identified in response to the findings of the analysis. And so, if there were issues around racially or ethnically concentrated areas of poverty such as -- or rather, identified areas of racially or ethnically concentrated areas of poverty, steps to deconcentrate or otherwise provide investments into those areas, could be part of goals and strategies within that Assessment of Fair Housing.

But again, because no specific fair housing planning process is in place now under the Interim Final Rule such as an Assessment of Fair Housing, there is no mandate to do that.

It's still considered a best practice, I think, regardless of the type of assessment that you're doing, but -- and integral to a fair housing framework for an assessment. But there is no requirement. Anything you'd like to add, Lauren?

Lauren Walker Lee: I agree with you completely. You don't have to do anything, but there are definite benefits to doing something. And one of the other things that I felt was just really powerful about the Assessment of Fair Housing was the mapping and the data search on HUD's website to be able to do that. And perhaps, Michelle or Paul, you could put that in the chat section as well.

The benefit of looking at those R/ECAPs is that you -- it's an eye-opener in looking at where those are in your community and looking at your jurisdiction's investment or disinvestment in those areas and how that's related over time.

I especially like to look at things over time to see whether things have gotten better or they've become more significant. And the city's role or the county or the state's role in that is significant about -- from the elected officials and the staff, taking a look about how to address some of those things.

So once again, Andrea is right, you don't have to do anything. But the benefit of doing something deep like that just shows meaningful action of you really taking it seriously and taking a look at something like that. Any other questions?

Andrea Juracek: Just a few minutes left. If anyone has any other questions, please put them in the Q&A.

Paul Turner: So one question that has just come in states, "Do you have any suggestions to address incomplete demographic data, i.e., and report it to agencies?"

Andrea Juracek: That's a good question. And I guess, I have a follow-up. Do you mean incomplete as an incomplete census data or are you thinking other types of data? I think regardless, if you're finding gaps in data in your area, your region, jurisdictions, you might have to get -- on HUD forms which were voluntary.

Okay, yeah, you might have to be a little creative in doing some outreach, as Lauren has talked about, reaching out to your local fair housing organizations, looking at that Affirmatively Furthering Fair Housing Tool that HUD still has available, to assist -- if it looks like to you that what's showing up in the tool is incomplete, you may want to go to your local jurisdiction directly.

Oftentimes, municipalities, counties, states, they are gathering their own data in a number of different ways, so you may have to do a FOIA request for that or a Freedom of Information Act Request. Lauren, do you have anything to add to that?

Lauren Walker Lee: I think that's excellent, Andrea. The only thing I would add is going to the MIT AFFH website and taking a look at some of those plans that have been done. Because one of the things that I like about it is you just look in there, and it's very interesting to find out what alternative data people have used.

So there might be one jurisdiction -- I talk about Philadelphia recently that they use a lot of Google maps in addition to the HUD maps. You know, a lot of the Assessment of Fair Housing, shows where they got different data sets.

There's a lot of -- and the last session that we had a couple of weeks ago was on data and mapping. And we'll be having another one of those in the future, but really looking beyond just what's required and looking for information that community groups or organizations have developed. Just looking for different kinds of information so that it feels more complete.

So we're going to be -- thank you all for joining us today. We just have a few more minutes until the end of this session. If there aren't any additional questions, we will just share the upcoming sessions.

So the October 25th session is on goal setting and reporting. There is a lot of information on that on that MIT AFFH website, if you want to look at that either before or after that particular session.

The November 8th and December 13th session will be the general question format. And the November 22nd will be on community engagement, which we've reported on before. And I think both Andrea and I have some experience with community engagement pieces.

So we really appreciate you coming. And I'm not sure if Andrea or Paul have anything else you would like to share.

Andrea Juracek: Nothing for me.

Lauren Walker Lee: All right. Thank you so much.

Paul Turner: Nothing for me. Thank you. This concludes this recording. Thank you so much. Have a great day.

(END)