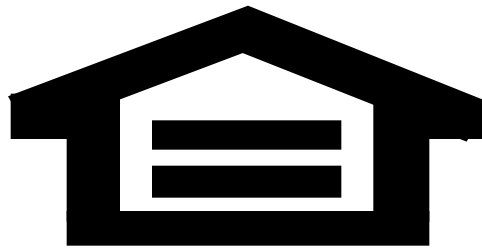


IDAHO FAIR HOUSING PLAN

Revised January 1999

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Dirk Kempthorne, Governor



EQUAL HOUSING OPPORTUNITY

Prepared on behalf of the State of Idaho by

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IDAHO FAIR HOUSING PLAN

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IDAHO FAIR HOUSING PLAN

I. Introduction

Fair housing is having the choice to live where you want to live and where you can afford to live without the fear or threat of discrimination.

Discrimination in this sense is any unlawful housing practice or action under Title VIII of the Civil Rights Act of 1968, as amended. Title VIII, commonly referred to as the Fair Housing Act, specifically provides that "...no person shall be subjected to discrimination because of race, color, religion, sex, handicap, familial status, or national origin in the sale, rental, or advertising of dwellings, in the provision of brokerage services, or in the availability of residential real estate related transactions..."

Title 67, Chapter 59, of the Idaho Code, the Commission on Human Rights, similarly seeks to "...secure for all individuals within the state freedom from discrimination because of race, color, religion, sex or national origin in connection with... real property transactions...". This citation also prohibits "...discrimination because of disability in real property transactions..."

Often persons unknowledgeable about fair housing law are puzzled about the concern that advocates and practitioners share about housing discrimination in Idaho. They cite Idaho's small minority populations and express dismay over making fair housing an issue in the state. Their perceptions could be graphically displayed as a pyramid with the Title VIII requirements applying only to a small group of persons at the tip, while the remaining larger population base is not affected by the Fair Housing Act.

The Fair Housing Act covers seven protected classes of persons. At close inspection, these seven protected classes apply to nearly everyone. Every person has a race, a color to their skin, a sex, and a national origin. Many people have a religion and even those persons without a religion are protected if they are denied housing because they are not a member of a particular religion. Many people belong to families with children. The Federal definition of disability includes many forms of handicaps which are protected under the Fair Housing Act.

In reality, once the total population included within these seven protected classes is taken into consideration, the perceptual pyramid becomes inverted with the Fair Housing Act providing protection from housing discrimination for the overwhelming majority of Idahoans in some ways and all Idahoans in other ways. It is with this understanding of the importance of housing choice in our lives and the broad applicability of fair housing law that the Idaho Fair Housing Plan has been prepared.

The intent in developing this Fair Housing Plan was not to research and analyze every possible aspect of the impediments identified, the resources needed, and the actions to be taken, and to catalogue them in a single document. Neither time nor other factors would permit such an undertaking. The production of such a document would merely be a snapshot reflecting a singular point in time that would become dated even before it was published. Instead, the State of Idaho established a planning process through which existing data and information is utilized to prepare the first Fair Housing Plan. As part of the process of preparing and updating the Consolidated Plan, the Fair Housing Plan is to be periodically revised to reflect new information, changing conditions, and evolving strategies to affirmatively further fair housing in Idaho.

II. Historical Overview

The U.S. Department of Housing and Urban Development (HUD) provides Federal funding to the State of Idaho for several housing and community development programs including, but not limited to, the Community Development Block Grant (CDBG) Small Cities Program, the HOME Investment Partnerships or HOME Program, the Emergency Shelter Grant Program and the Housing Opportunities for Persons with AIDS (HOPWA) Program. The CDBG Program is administered by the Idaho Department of Commerce, and the HOME, ESG and HOPWA programs are administered by the Idaho Housing and Finance Association.

The State of Idaho began administering its CDBG Small Cities Program in 1981. Since 1983, the federal CDBG statute has contained a requirement that recipients of CDBG funding certify that they will affirmatively further fair housing in the administration of their programs. This affirmatively furthering fair housing requirement, however, was not reflected in the CDBG regulations until 1988. During the same year, HUD developed Fair Housing Review Criteria which described the activities that HUD deemed acceptable in reviewing a grantee's affirmatively furthering fair housing performance.

In enacting the National Affordable Housing Act in 1990, Congress set forth regulations requiring the preparation of Comprehensive Affordable Housing Strategies. Under the 1992 Comprehensive Housing Affordability Strategy regulations, HUD referenced its previously developed Fair Housing Review Criteria and further defined the role of State CDBG grantees in affirmatively furthering fair housing under 24 CFR 570.487(b). The HOME Program regulations similarly require fair housing compliance under 24 CFR 92.351.

HUD published its Consolidated Plan regulations in 1995. The Consolidated Plan combines the Comprehensive Housing Affordability Strategy and Community Development Plan required by the CDBG Program, and the

submission and reporting requirements of the CDBG, HOME, ESG, and HOPWA Programs. As part of the Consolidated Plan, HUD required grantees to submit certifications to affirmatively further fair housing.

The extent of a grantee's obligation to affirmatively further fair housing has never been defined in any statute. HUD, however, defines the grantees obligation to affirmatively further fair housing to include:

- 1) the preparation of an analysis of impediments to fair housing choice within the grantee's jurisdiction, and
- 2) the implementation of actions to overcome the effects of any impediments identified as a result of preparing the analysis.

HUD also requires grantees to maintain records reflecting their activities with regard to the analysis and actions taken to meet their obligation to affirmatively further fair housing.

III. Purpose of Plan

Before the State of Idaho can effectively meet and affirmatively further its fair housing responsibilities, it must first identify fair housing problems which exist and the resources available to resolve these problems. Without this knowledge, any actions by the state to affirmatively further fair housing will fall short of their intended goal.

The purpose of the Fair Housing Plan is to provide documentation of the fair housing problems identified through the analysis of impediments and the action strategies designed to mitigate and/or eliminate the impediments to fair housing choice. As such, the Fair Housing Plan provides the data and information that serves as the logical basis for Idaho's fair housing planning process. The Idaho Fair Housing Plan also reflects the state's fair housing planning done in conjunction with the periodic review, evaluation, and revision required for of the Consolidated Plan.

IV. Fair Housing Plan

A. Introduction

The Idaho Consolidated Plan contains a certification that, as a recipient of CDBG and other Federal funds, the state will affirmatively further fair housing. Specifically, 24 CFR Part 91, Consolidated Submissions for Community Planning and Development Programs, 91.225, Certifications (a) (1) Affirmatively Furthering Fair Housing, requires the State of Idaho to conduct "...an analysis to identify impediments to fair housing choice..." within the state, to "...take appropriate actions to overcome the effects of any

impediments identified...", and to maintain "...records reflecting the analysis and actions...". Collectively, these three components constitute the Fair Housing Plan.

B. Idaho Fair Housing Responsibilities

The Idaho Department of Commerce (IDOC) and the Idaho Housing and Finance Association (IHFA) are committed to the elimination of segregation and other discriminatory housing practices. The fundamental goal of both IDOC and IHFA fair housing policy is to make housing choice a reality through fair housing planning and implementation activities. In achieving this goal, IDOC and IHFA will use all of the programmatic and enforcement tools available to assure fair housing choice in Idaho.

The provisions to affirmatively further fair housing are principal and long standing components of the housing and urban development programs provided by the U.S. Department of Housing and Urban Development (HUD). These provisions originate from the mandate of Section 808(e)(5) of Title VIII of the Civil Rights Act of 1968, as amended, commonly referred to as the Fair Housing Act. This Act requires the Secretary of HUD to administer all of its housing and urban development programs in a manner consistent with affirmative fair housing.

The State of Idaho is obligated to affirmatively further fair housing partly due to the regulatory requirements governing the receipt of Federal funding for housing and community development programs. As recipients of Federal funding, the IDOC and IHFA certify that they will comply with the statutory and regulatory provisions to affirmatively further fair housing in the administration of their housing and community development programs.

The State of Idaho, however, has the dual responsibility to undertake fair housing planning at the state level and to ensure that grantee jurisdictions comply with their fair housing certifications. This obligation, therefore, is not restricted to only the design, operation, or administration of programs funded by HUD at the state or local level. The obligation to affirmatively further fair housing extends to all housing and housing related activities within the state. The State of Idaho also has the responsibility to seek input and cooperation from other governmental agencies, community and business organizations, and the public in the preparation of its Fair Housing Plan.

V. Analysis of Impediments to Fair Housing Choice

A. Definition and Purpose

A critical component of the Fair Housing Plan is the Analysis of Impediments to Fair Housing Choice (AI). Impediments to fair housing choice are any actions, omissions, or decisions taken which restrict or have the effect of

restricting the availability or choices in housing on the basis of race, color, religion, sex, disability, familial status, or national origin.

Housing choice is having the equal and open access to those residential opportunities which are fundamental to meeting individual and family needs. Because housing choice is so important to individual and community well being, government officials, business leaders, and private citizens must strive for the goal of fair housing if equality of opportunity is to be achieved. The purpose of the AI is to provide the data and information that will serve as the logical basis for Idaho's fair housing action planning.

B. Framework and Methods

The scope of the AI includes a review of the State of Idaho's laws, regulations, and administrative policies, procedures, and practices, and an assessment of whether they present impediments to the location, availability, affordability, and accessibility of housing. The AI also includes a review of those policies, procedures, and practices that appear neutral on their face, but may operate to deny or adversely affect housing choice or availability for those classes of persons protected by fair housing laws. The AI includes an assessment of other private and public conditions which may constitute impediments to or affect fair housing choice. This involves a review of fair housing complaint statistics, fair housing and human rights survey data, and other appropriate and relevant sources of information that would identify impediments to fair housing choice.

It is important to note that HUD directs grantees to prepare their AI using existing data and information sources. As such, the State of Idaho's AI is limited to those existing housing and demographic studies and reports, ordinances and codes, and other relevant data and information that could be identified during the research phase of the fair housing planning process. Additional sources of pertinent data and information may be available at a later date and will be included in the AI as the Fair Housing Plan is periodically updated with the Consolidated Plan. Other data and information may be needed to more fully complete the AI, but may not exist. The data and information needed, but which may not be available, will be identified as an impediment to fair housing and will be listed as an activity to be completed under the Action Plan component of the Fair Housing Plan.

The Idaho Department of Commerce is the lead agency in coordinating the fair housing process for the State of Idaho. In keeping with its responsibilities and to become more fully aware of the causes, existence, nature, and extent of fair housing problems, and the resources available to prevent and resolve them, the Idaho Department of Commerce organized the Idaho Fair Housing Advisory Committee (IFHAC). The IFHAC was established to provide guidance and review and comment in the development of the state's Fair Housing Plan.

The structure of the IFHAC includes a primary and a secondary level of partnership. The IFHAC's primary partnership includes three organizations who have formally set their fair housing planning relationship through a Memorandum of Understanding. The three primary IFHAC partners are: IDOC, the lead primary partner; the Idaho Housing and Finance Association (IFHA), the state housing finance agency; and the Idaho Fair Housing Council (IFHC), established under the Fair Housing Initiatives Program and the primary partner responsible for enforcement as well as outreach and education activities.

The IFHAC's secondary partnership is these agencies and organizations:

- Association of Idaho Cities
- Idaho Association of Counties
- Idaho Association of Realtors
- Idaho Bankers Association
- Idaho Building Contractors Association
- Idaho Housing Coalition
- Idaho Human Rights Commission

With the exception of the Idaho Human Rights Commission (IHRC), these agencies and organizations are included in the fair housing planning process for three reasons. First, each entity represents a major private and public constituency involved in the regulation, construction, sales, and financing of housing, or in the advocacy of affordable and fair housing for low income and protected classes of persons. Second, each entity and their respective constituencies would be affected by the implementation of the Fair Housing Plan. Third, each entity represents and advocates for their respective constituencies statewide and, as such, their early and continued involvement in an advisory capacity will facilitate the development of a consensus planning process forged from their collective sense of ownership, support, and voluntary compliance.

The IHRC is the state agency statutorily established to enforce Idaho's human rights laws which includes the state's fair housing law. By virtue of its mission, IHRC does not have constituencies nor does it advocate for any particular group within the state's population. However, it is because of IHRC's responsibility, interest and experience with fair housing enforcement that it is a member of the IFHAC.

Upon completion of the draft AI and the Action components, the Fair Housing Plan was published and disseminated for public review and comment in accord with citizen participation requirements. Upon the receipt of public input to the Fair Housing Plan, a final document was prepared and made available to the public in accordance with the Consolidated Plan. It is the intent of the State of Idaho that the IFHAC

become a permanent structure with oversight responsibilities with respect to periodic revisions to the Fair Housing Plan as part of the process for preparing the Consolidated Plan.

C. Identification of Impediments and Findings

1. Housing Discrimination: Both purposeful and unintentional housing discrimination practices are thought to be problems throughout Idaho, and are adversely affecting the achievement of fair housing in Idaho. Many legal, civil, and human rights officials agree, and claim that these discriminatory housing practices generally go unreported. This anecdotal information is supported, in part, by statistical and survey data.

a. IHRC Complaint Data: According to the Idaho Human Rights Commission (IHRC), only 38 housing discrimination complaints were processed between 1989 and 1996. Although the number of complaints varied from year to year during this period, the IHRC received an annual average of 4.75 complaints per year.

**REGIONAL HOUSING DISCRIMINATION
COMPLAINT BASIS BY PROTECTED CLASS
1989 to 1996**

	RACE	COLOR	RELIGION	SEX	HANDICAP	FAMILIAL STATUS	NATIONAL ORIGIN	TOTAL
REGION I	0	0	0	1	0	0	0	1
REGION II	2	0	0	1	0	0	0	3
REGION III	14	0	0	3	2	0	7	26
REGION IV	1	0	0	2	0	0	3	6
REGION V	0	0	0	0	0	0	0	0
REGION VI	1	0	0	1	0	0	0	2
TOTAL	18	0	0	8	2	0	10	38

SOURCE: Idaho Human Rights Commission, Boise, Idaho.

The largest categories of discrimination complaints received by IHRC were based on race and national origin with race representing 18 cases or 47.4% of all cases and national origin representing 10 cases or 26.3% of the total. Housing complaints based upon sex or gender discrimination represented another 8 cases or 21.1% of the total. There were only two cases filed on the basis of housing discrimination against persons with disabilities, and no filings on the basis of color,

religion, or familial status. It is important to note that IHRC's enabling legislation does not cover familial status as a protected class and explains the absence of such housing discrimination cases in the data presented.

b. HUD Complaint Data: In comparison, the U.S. Department of Housing and Urban Development's (HUD) Office of Fair Housing and Equal Opportunity (FHEO) processed 169 housing discrimination filings from Idaho between 1989 and 1996. During this period, HUD averaged 21.13 complaints per year. Comparing the IHRC data for this same period, nearly five times the complaints per year are made to HUD than to IHRC.

**REGIONAL HOUSING DISCRIMINATION
COMPLAINT BASIS BY PROTECTED CLASS
1989 TO 1999**

	RACE	COLOR	RELIGION	SEX	HANDICAP	FAMILIAL STATUS	NATIONAL ORIGIN	TOTAL
REGION I	2	0	1	3	12	14	5	35
REGION II	1	0	0	1	20	11	0	33
REGION III	18	1	4	6	99	50	40	193
REGION IV	2	0	0	2	15	9	8	29
REGION V	2	0	1	2	11	10	6	32
REGION VI	2	0	0	1	6	9	1	19
TOTAL	22	1	6	15	161	83	53	339

SOURCE: U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity, Seattle, Washington.

The largest categories of housing discrimination complaints processed by HUD for Idaho were:

- a) familial status representing 64 or 37.87% of the total,
- b) handicapped or persons with disabilities representing 46 or 27.22% of the total, and
- c) national origin representing 24 or 14.20% of the total.

Other categories of complaints received by HUD from Idaho included 17 cases or 10.06% on the basis of racial discrimination, 12 cases or 7.10% on the basis of sex discrimination, five cases or 2.96% on the basis of religious

discrimination, and one case or 0.59% on the basis of color. From this field of 169 fair housing charges, 153 cases were closed. Of the closed cases, 45 or 29.4% were successfully conciliated.

c. IFHC Complaint Data: In further contrast, the Idaho Fair Housing Council (IFHC) has received 242 cases alleging housing discrimination between January of 1995 and September of 1996. Comparing IHRC and HUD annual averages to the IFHC's nearly two year caseload, the IFHC has handled many more times the complaints than IHRC and HUD. It is suspected that the inclusion of the words "fair housing" in IFHC's name has much to do with people's perception of who to contact concerning housing discrimination.

**REGIONAL HOUSING DISCRIMINATION
COMPLAINT BASIS BY PROTECTED CLASS
1995 and 1996**

	RACE	COLOR	RELIGION	SEX	HANDICAP	FAMILIAL STATUS	NATIONAL ORIGIN	TOTAL
REGION I	0	0	0	1	2	11	1	15
REGION II	1	0	0	2	3	6	1	13
REGION III	18	2	6	9	52	49	22	158
REGION IV	1	0	0	1	4	9	4	19
REGION V	1	0	1	2	9	7	4	24
REGION VI	1	0	2	0	1	4	5	13
TOTAL	22	2	9	15	71	86	37	242

SOURCE: Idaho Fair Housing Council, Boise, Idaho.
Unable to provide 97-99 data

During the nearly 21 months since the IFHC opened its doors, 86 cases or 35.54% of the complaints received have alleged discrimination on the basis of familial status, while 71 cases or 29.34% of the complaints involved discrimination against persons with disabilities. Another 37 cases or 15.29% claimed discrimination on the basis of national origin. These IFHC statistics are the same top three categories of complaints received by HUD for the state and closely approximate the same percentages of HUD's totals. From this field of 242 fair housing complaints received by IFHC, 133 cases were closed. Of the closed cases, 41 or 30.83% were negotiated and resolved with 11 or 8.27% of the cases having been successfully conciliated.

d. Survey Data: As evidenced by the complaint comparisons cited, many fair housing practitioners and protected class advocates in Idaho have come to the conclusion that illegal discrimination in housing is occurring and that

this discrimination is a far larger problem than the differing number of reported incidents would indicate. In an attempt to ascertain why this set of circumstances exists and why the number of housing discrimination complaints is so low, several fair housing studies and surveys have been completed within Idaho over the last fifteen years.

The Boise Elmore Community Housing Resource Board (CHRB) published A Survey of Perceptions, Experience and Knowledge of Boise Residents Regarding Fair Housing in August of 1984. The survey utilized both mail out and door to door data gathering methods and included 700 households and 300 members of various organizations and groups including realtors, landlords, churches, advocates, and service clubs. The CHRB survey found that only one third of the respondents had any knowledge of fair housing laws. Of those respondents reporting some knowledge of fair housing laws, less than two thirds could correctly name any prohibited basis of discrimination. The survey also found that 80% of all respondents could not identify what governmental or other agencies enforce fair housing laws. Aside from a lack of knowledge about fair housing laws, the CHRB survey also found that 42% of all of the respondents reported that they believe minorities are discriminated against in the Boise housing market. The CHRB concluded, among other things, that the survey results suggest that outreach and education about fair housing laws could increase perceptions and tolerance concerning racially-mixed neighborhoods.

The Idaho New Horizons Task Force (INHTF) conducted a survey of low income and protected class advocates, and housing and service providers in June of 1985 as part of its responsibilities under HUD's New Horizons Housing Opportunity Program. The INHTF survey found 94% of the respondents believed that their constituents experience housing discrimination, and 60% believed that victims of such discrimination would not contact a fair housing agency. According to the survey, this is consistent with information from the IHRC which notes that, of those who do contact the IHRC, "...many elect not to file formal complaints...", in spite of IHRC's encouragement that they do so.

The reasons for failure to follow through with formal complaints by the victims of housing discrimination were documented by the INHTF survey. Sixty percent believed that filing a housing discrimination complaint does little good. Seventy-six percent believed that filing a housing discrimination complaint took too much time. Sixty-eight percent believed that it is too hard to prove housing discrimination, while 48% did not "...want to be labeled a troublemaker...".

The INHTF survey also identified the following impediments to achieving fair housing in Idaho:

- a lack of knowledge by the general public about what is illegal under the fair housing laws,
- a lack of knowledge about where to go and what to do if a person is a victim of discrimination, and
- a lack of coordinated and centralized data and information concerning housing discrimination complaints.

The IHRC published A Survey of the Extent of Racial and Religious Intolerance in Idaho in April of 1988. The IHRC, an agency of Idaho State government, commissioned the Boise State University Survey Research Center to conduct the survey of 444 households statewide. Although the IHRC survey found that only one or two percent of the respondents stated that they or someone in their household had been harassed, physically hurt, or was the target of property damage due to racial and religious discrimination in the last two years, what is significant is that "...70 percent of these incidents were not reported to any authority..." The IHRC survey also found that more than 41% of all survey respondents did not know of an agency or authority that could be informed of such instances of discrimination. The survey did find, however, that "...the greater the level of education, the greater the knowledge of where to report racially and religiously motivated incidents of harassment, physical harm, or property destruction...". Further, the IHRC survey found the level of education was related to positive attitudes toward racial and religious minorities in Idaho.

The IHRC also published a report titled, Findings and Recommendations Following Community Forums Held to Assess Inter-Group Tensions in Canyon County, in February of 1993. As the title indicates, the IHRC held three forums involving 60 individuals in Canyon County to learn more about the nature of reported inter-group tensions between the Hispanic and Anglo communities. This IHRC document reported that "...Hispanics constitute the state's largest minority group..." and that "...there are more Hispanics living in Canyon County than any other county in the state...". The report further reported that 22% of Idaho's Hispanic population reside in Canyon County "...where they comprise 14% of the total population...", and that Canyon County's Hispanic population grew "...45% between 1980 and 1990...". Among other demographics cited, the report also stated that "...33% of the Hispanics living in Canyon County live in poverty compared to 13% of those who are Anglo...".

From this data and the participation in the forums, the IHRC found

that "...significant tensions do exist between the Hispanic and Anglo communities..." in Canyon County, and that "...some institutions in the County deny that tensions exist...". Further, the report stated that the IHRC "...finds that many Hispanic leaders are angry and resentful, believing that their voice isn't being heard...", and that "...evidence of segregation in many aspects of community life..." was found.

The CHRB published an Analysis of Impediments to Fair Housing Boise City and Elmore County, Idaho in January of 1994. Prepared under a contract with the City of Boise CDBG Program, this Analysis of Impediments (AI) found examples of illegal housing discrimination being practiced in Idaho including restrictive covenants directed against minorities; zoning codes excluding nontraditional families; discrimination against families by mobile home parks; real estate advertisements with exclusionary or other inappropriate language, and the frequent failure to use or display the equal opportunity logo. The AI also documented, that real estate firms, rental management companies, and mortgage lenders are less than fully informed about the Voluntary Affirmative Marketing Agreement and fair housing laws and practices. Based upon these impediments, the Analysis concluded that "...clearly a significant opportunity exists to educate housing professionals (and others)... about their responsibilities to provide equal opportunity housing, and a great deal can be done to raise awareness and sensitivity to civil rights issues in general...".

Findings: The data, studies, and surveys identified above have three primary findings. First, they found that instances of illegal housing discrimination and segregation are occurring within Idaho. Second, these studies and surveys found that a substantial lack of knowledge exists both among the general public and housing professionals as to what constitutes housing discrimination, what the Fair Housing Law covers, and where to seek relief from housing discrimination. The third finding is that education and outreach activities are effective, long term strategies for mitigating and/or eliminating illegal housing discrimination in Idaho.

2. Substantial Equivalency: No jurisdiction within the State of Idaho has a fair housing ordinance or law which is substantially equivalent to Federal fair housing legislation. Title 67, Chapter 59, of Idaho Code established the Idaho Human Rights Commission (IHRC). Under this citation, the IHRC handles discrimination complaints in four areas: 1) education, 2) employment, 3) real estate transactions, and 4) public accommodations. However, the classes of persons protected by Idaho law cover all of those included under the Federal Fair Housing Act with the exception of familial status. In addition, the IHRC lacks the subpoena power and the budget to enforce new powers. Due to these two facts, Idaho's fair housing law has not been granted substantially equivalent status by HUD.

If Idaho's fair housing laws could be substantially equivalent, and a budget existed to increase enforcement; many more housing discrimination complaints could be handled in the state instead of long distance with HUD's Office of Fair Housing and Equal Opportunity in Seattle, Washington. Many legal, civil, and human rights officials agree that substantial equivalency would contribute significantly to achieving fair housing goals in Idaho. For example, between 1989 and 1996, the Office of Fair Housing and Equal Opportunity closed 153 fair housing complaints cases. Of this total, 53 or approximately 34.64% were closed because the complainant could not be located, the complainant failed to cooperate, or the complainant withdrew the complaint.

Findings: It is believed that the lack of state legal authority and enforcement capacity to process all types of housing discrimination complaints, the duration of time it takes to resolve complaints, and other factors associated with the long distance processing of housing discrimination complaints causes many complainants to lose interest and/or become frustrated, thus removing themselves from the legal process before resolution of their complaints. This is especially the case when they have secured other satisfactory housing in the interim. The lack of fair housing law within Idaho that is substantially equivalent to the Federal legislation is a condition which adversely affects the achievement of fair housing in Idaho. A strong need exists within Idaho to add familial status and subpoena powers to the existing state legislation, and increase the enforcement budget to achieve substantial equivalency for Idaho's fair housing statute.

3. Organizational Capacity: The IHRC handles discrimination complaints in four areas: 1) education, 2) employment, 3) real estate transactions, and 4) public accommodations. However, IHRC's caseload is primarily comprised of employment discrimination cases. Although some fair housing education and outreach is provided and some housing discrimination cases are handled as the data previously presented indicates, the IHRC is not adequately funded and needs additional staff to fully enforce the state fair housing requirements, let alone Federal law. This lack of organizational capacity represents an impediment to fair housing enforcement in Idaho.

In addition to the IHRC, the Idaho Fair Housing Council (IFHC) is responsible for enforcement as well as outreach and education activities in the state. The IFHC began as a project of Idaho Legal Aid Services and is funded through a two year Fair Housing Initiatives Program grant from HUD. In the last half of its second year of funding, the IFHC has made substantial progress in starting up a private enforcement program. The IFHC is working to bolster their efforts in handling housing discrimination complaints, especially in the areas of testing and related enforcement activities.

Findings: The achievement of fair housing principles and practices statewide requires the twin pillars of education and enforcement. Both

pillars require formal institutional infrastructure to provide the framework for coherent, consistent, and effective action statewide. However, Idaho has no such organizational capacity. The absence of statewide institutional infrastructure to provide both affirmatively furthering fair housing and fair housing enforcement activities constitutes a substantial impediment to the achievement of fair housing goals in Idaho.

4. Fair Housing Data and Information Data Base: There is no single point of contact or clearinghouse function for fair housing and landlord-tenant complaint processing. In addition, the same clearinghouse function is needed for data, information, and technical and educational assistance concerning fair housing and landlord-tenant law for both the public and for housing professionals. Data and information concerning fair housing complaints is collected and maintained by HUD, IHRC, and IFHC; however, it is maintained in differing formats and time frames using somewhat differing codes and definitions. Further, the data and information are not consolidated, available in a form that is readily useable, and may contain duplicative counting. These and other concerns over data and information constitute an impediment to fair housing.

Findings: The need exists within Idaho for the establishment of a coherent system for compiling maintaining fair housing complaint data; information concerning fair housing and landlord-tenant compliance.

5. Collaboration: Compounding the organizational capacity and data and information impediments described above, is the limited collaboration among private, nonprofit and governmental agencies and organizations responsible for enforcing and/or affirmatively furthering fair housing. Collaboration on fair housing issues may result in some consolidation of efforts, especially in testing and outreach and education activities, with potential cost savings.

Findings: A strong need exists within Idaho for organizational leadership and initiative for coordination and collaboration concerning fair housing information, programs, and activities.

6. Property Management: Often fair housing complaints arise from the rental housing market. Increasingly owners are using property managers to administer their rental properties, however, many housing program professionals and protected class advocates find that a general lack of knowledge and experience concerning fair housing exists among many property managers.

Findings: An impediment exists because there is no formal fair housing educational process for property managers.

7. Local Government: Concerns have been raised about local government decisions relating to development proposals and fair housing compliance. Most often, the fair housing issues revolve around reasonable accommodations for residential facilities serving persons with disabilities and occupancy standards for multifamily projects. Planning and zoning decisions can have direct and disparate impacts on protected classes, and must be carefully considered to assure compliance with fair housing law.

Findings: The lack of education and technical assistance regarding the requirements of the Fair Housing Law, for many of Idaho's local elected officials, and the planning and zoning, building inspection, and legal staff, is thought to constitute an impediment to fair housing.

8. Eviction: The lack of an adequate supply of affordable housing makes it hard to find housing, particularly for low income persons who spend a greater portion of their monthly income on housing costs.

This especially affects tenants in subsidized housing so that often they do not report housing discrimination. They tolerate it because they fear loss of their public housing unit or subsidy certificate due to an eviction if they should complain about fair housing violations to the public housing authority or property manager. This is true even though these tenants can only be evicted for good cause.

Tenants in the private units do not have even this eviction protection under the state law. For most Idaho tenants, a landlord need not state any reason for the eviction. The landlord merely notifies the tenants that they must move. In the case of mobile home parks, Idaho permits an eviction upon 90 days notice with no cause needed. Many states have "good cause" eviction requirements for mobile home parks,

The economic impacts of eviction, which include the cost of moving, the first and last months' rent, new utility deposits, and the possible the relocation of children in schools, all serve to impede fair housing choice. Eviction is especially devastating for mobile homeowners when the cost to relocate a home may be as much as \$3,000 to \$4,000. This could make filing a fair housing complaint an economic burden when reporting an illegal act.

Findings: Many low income housing and protected class advocates perceive the provisions of Idaho law which allow for tenant eviction with "no cause" as an impediment to fair housing.

9. NIMBY: In response to the construction or establishment of group homes, homeless shelters, and/or similar low income and supportive housing facilities, local neighborhood, homeowner, and other associations and organizations have adopted the rallying cry of "Not In My Back Yard"

(NIMBY). The protests of these ordinary citizens before planning and zoning commissions and city council, are within their First Amendment right of free speech. Many believe that they are protecting their property values, the safety of their families, and the quality of life in their neighborhoods. However, local government actions based on NIMBY protests can be discriminatory on persons protected by fair housing laws.

Findings: Instances of NIMBYism within the state present impediments to fair housing choice in Idaho. Courts have found that some local government actions have contributed to this exclusionary environment through the promulgation and enforcement of restrictive planning and zoning ordinances and practices. Such ordinances and practices include, but are not limited to, the use restrictive definitions of family as an occupancy standard and restricting the housing types allowed within particular residential area without regard to reasonable accommodations or other requirements of the fair housing laws. Many restrictions are enacted without investigation of their impact on fair housing.

VI. Fair Housing Action Plan

A. Introduction

To bring the efforts of its fair housing planning and analysis to fruition, the State of Idaho must implement a plan of action designed to eliminate and mitigate the impediments to fair housing choice identified by the analysis. To guide implementation of its Fair Housing Action Plan, the state needs a clear set of goals and objectives and a time frame for achieving them. The goals and objectives need responsible and capable individuals in organizations with adequate and appropriate resources committed to assuring their achievement.

B. Preliminary Actions

The preliminary actions include establishing goals, time frames, and resource commitments. Goals which seek to address the impediments identified through the analysis must be clearly stated. Each goal must then have individual corresponding action objectives believed to be essential to the achievement of the goal.

A schedule to monitor the progress in implementing the Action Plan must to be established. The progress schedule should allow adequate time for the completion of each objective.

Preliminary actions include the identification and commitment of those agencies and organizations needed to carry out the various action objectives. Aside from the human resources required, an assessment of the financial

and other resources needed to achieve the stated fair housing goals must be completed. Written commitments of the needed human and financial resources will help ensure the timely completion of the objectives and achievement of Idaho's fair housing goals.

C. Action Plan Implementation

The development of measurable results, consensus support, and a process of consistent oversight and evaluation for each objective are critical to the success of implementing Idaho's Fair Housing Plan. The Idaho Fair Housing Advisory Committee's primary level of partnership provides leadership and guidance as may be needed to resolve conflicts and oversee the incorporation of corrective measures, changes, or additions as a result of monitoring and evaluating the progress of any objective or the achievement of any goal. This will require the setting of some standards, assessment techniques, and reporting methods.

The following Fair Housing Action Plan identifies **nine** prioritized impediments to fair housing choice within Idaho, and the action goals and objectives for mitigating and/or eliminating them. As such, the listing of the prioritized impediments within the Action Plan is a reordering of the impediments from their listing in Section V. Analysis of Impediments to Fair Housing Choice. The Fair Housing Action Plan also identifies the schedule by which progress will be achieved for each of the goals and objectives, the entity responsible for taking the lead and supporting roles in implementing the actions taken, and the resource commitments needed for successful completion. Lastly, the Fair Housing Action Plan identifies the monitoring and evaluation criteria to be used in assessing progress towards task completion.

Fair Housing Action Plan

1. Impediment: EDUCATION AND ENFORCEMENT The achievement of fair housing principles and practices statewide requires the twin pillars of education and enforcement. Both pillars require formal institutional infrastructure to provide the framework for coherent, consistent, and effective action statewide. However, Idaho has had no such organizational capacity. The absence of statewide institutional infrastructure to provide both affirmatively furthering fair housing and fair housing enforcement activities constitutes a substantial impediment to the achievement of fair housing goals in Idaho.

a. Action Goal: Designate permanent Idaho institutions to enforce fair housing laws, and to provide education and outreach.

b. Action Objective(s):

(1) Support the Idaho Fair Housing Advisory Committee (IFHAC) role to provide guidance and oversight in the fair housing planning process required by the Consolidated Plan regulations.

(2) Support the Idaho Human Rights Commission (IHRC) role as Idaho's fair housing enforcement organization via legislation. Provide funding and staff resources to carry out enforcement tasks.

(3) Promote fair housing outreach, education, and enforcement through private and public partnerships, cooperative agreements, contracts, grants, and loans.

c. Progress Schedule: Ongoing effort.

d. Implementation Lead and Support: IFHAC.

e. Resource Commitments:

(1) The Idaho Fair Housing Council will seek additional Fair Housing Initiatives Program funding from the U.S. Department of Housing and Urban Development, and foundation and grant sources to continue its role in fair housing outreach, education, and enforcement.

(2) IDOC and IHFA will seek and/or commit financial and inkind resources to assure their compliance with the affirmatively furthering fair housing requirements of their respective Federally funded programs.

(3) IHRC will likewise seek additional resources to assist their education and enforcement efforts.

f. Monitoring and Evaluation:

(1) Annual Action Plan performance review and assessment of progress by the Idaho Fair Housing Advisory Committee.

(2) Internal agency's performance reviews by IHFA, IDOC, and IHRC.

(3) Annual monitoring site visits by the U.S. Department of Housing and Urban Development.

Fair Housing Action Plan

2. Impediment: COORDINATION AND COLLABORATION A strong need exists within Idaho for organizational leadership and initiative for coordination and collaboration concerning fair housing information, programs, and activities.

a. Action Goal: Continue the ongoing interagency partnership among the:

Idaho Human Rights Commission (IHRC),
Idaho Department of Commerce (IDOC),
Idaho Housing and Finance Association (IHFA)
Association of Idaho Cities
Idaho Association of Counties
Idaho Association of Realtors
Idaho Bankers Association
Idaho Building Contractors Association
Idaho Housing Coalition

and others that develop policy, structure, and process for coordinated planning and action with respect to affirmatively furthering fair housing and fair housing enforcement within Idaho.

b. Action Objective(s): Each agency should detail their legal responsibilities, and action and resource commitments to undertake this formal partnership and include these within a written agreement.

c. Progress Schedule: Ongoing cooperation and communications

d. Implementation Lead and Support: IHFA, IDOC, and IHRC.

e. Resource Commitments: Little or no resources are required to implement this action item.

f. Monitoring and Evaluation:

(1) Annual Action Plan performance review and assessment of progress by the Idaho Fair Housing Advisory Committee.

(2) Annual monitoring site visits by the U.S. Department of Housing and Urban Development.

Fair Housing Action Plan

3. Impediment: EDUCATION AND OUTREACH One of the three primary findings of the data, studies, and surveys identified above is that education and outreach activities are effective, long term strategies for mitigating and/or eliminating illegal housing discrimination in Idaho.

a. Action Goal: Educate general public, especially protected classes of persons under Federal and state laws, and public, private, and nonprofit housing providers regarding their fair housing rights and responsibilities.

b. Action Objective(s):

(1) Idaho Banking Association will continue to promote and/or provide fair housing outreach/education services to member lending institutions.

(2) The Idaho Real Estate Commission and the Idaho Association of Realtors will continue to promote and provide fair housing and provide fair housing outreach and education to realtor members.

(3) The Idaho Fair Housing Council (IFHC) will continue to provide fair housing outreach and education services to the public, at-risk housing consumers, and public, private, and nonprofit housing providers and the housing industry in general.

c. Progress Schedule: The time frames and commitments will correspond to the schedule for the state's Consolidated Plan development and submittal.

d. Implementation Lead and Support: Idaho Department of Commerce (IDOC), Idaho Housing and Finance Association (IHFA) and IFHC.

e. Resource Commitments: In addition to the private and nonprofit sources identified under the action objectives above:

(1) IFHC will submit applications to the U.S. Department of Housing and Urban Development for Fair Housing Initiatives Program (FHIP) funding in partnership with IDOC and IHFA. This grant application under the FHIP Outreach and Education category will include an action plan and budget for affirmatively furthering fair housing activities.

(2) Jurisdictions receiving Community Development Block Grant (CDBG) funds should commit resources to affirmatively further fair housing activities.

These CDBG recipients include the State of Idaho and its small city subgrantee jurisdictions, and the City of Boise, the City of Nampa, and the City of Pocatello as CDBG Entitlement jurisdictions.

(3) IHFA administers a variety of Federally funded housing programs for the State of Idaho including, but not limited to, Section 8 Rental Subsidy Programs, the HOME Investment Partnership Program, and McKinney Act Programs for homeless persons. In addition, IHFA also administers single and multi-family mortgage programs. IHFA should commit resources to affirmatively further fair housing activities for each of these program areas.

f. Monitoring and Evaluation:

(1) Annual Action Plan performance review and assessment of progress by the Idaho Fair Housing Advisory Committee.

(2) Internal agency performance reviews by IHFA, IDOC, and IHRC.

(3) Annual monitoring site visits by the U.S. Department of Housing and Urban Development.

4) Periodic evaluations should be conducted of the receipt and administration of FHIP grant funds, the number of fair housing symposiums and training workshops conducted, etc. to determine the effectiveness.

Fair Housing Action Plan

4. Impediment: SUBSTANTIAL EQUIVALENCY It is thought that the lack of state capacity to process complaints, the duration of time it takes to resolve complaints, and other factors associated with the long distance processing of housing discrimination complaints causes many complainants to lose interest and/or become frustrated, thus removing themselves from the legal process before resolution of their complaints. This is especially the case when they have secured other satisfactory housing in the interim. The lack of fair housing law within Idaho that is substantially equivalent to the Federal legislation is a condition which adversely affects fair housing in Idaho. A strong need exists within Idaho to add familial status, subpoena powers and penalties, to the existing state legislation, thereby achieving substantial equivalency for Idaho's fair housing statute. Proper budgets and staffing levels will be needed to implement these changes.

a. Action Goal: Achieve substantial equivalency for Idaho's fair housing law. There are four items which may or may not be combined in to single legislation:

- a. Adding familial status to the existing statutes.
- b. Adding subpoena power and penalties to the statutes.
- c. Increasing budgets and staff for the IHRC.

b. Action Objective(s): Continue to support new legislation. Inform Governor and legislators and develop their support for legislation and budgets. Negotiate substantial equivalency status with U.S. Department of Housing and Urban Development (HUD).

c. Progress Schedule: This strategy will take a gradual effort to implement.

d. Implementation Lead and Support: Idaho Fair Housing Advisory Committee private housing industry member organizations with support, as needed and appropriate from Idaho Human Rights Commission, Idaho department of Commerce, Idaho Housing and Finance Association, Idaho Fair Housing Council, and Idaho Legal Aid Services.

e. Resource Commitments: Idaho Fair Housing Advisory Committee, private housing industry member organizations.

f. Monitoring and Evaluation:

- (1) Annual Action Plan performance review of progress by the IFHAC.
- (2) Internal agency performance reviews by IHFA, IDOC, and IHRC.
- (3) Annual monitoring site visits by HUD.

Fair Housing Action Plan

5. Impediment: FAIR HOUSING DATA A need exists within Idaho for the establishment of coherent system for compiling and maintaining fair housing complaint data as well as information concerning fair housing and landlord-tenant compliance.

The only fair lending data available to be included in the Analysis of Impediments was a review of Home Mortgage Disclosure Act (HoMDA) data completed for the Boise and Canyon County areas by the Idaho Citizens Network (ICN). The HoMDA was enacted by Congress in 1975 and requires banks, savings and loan associations, thrifts, credit unions, and mortgage banks to publicly report detailed data on their mortgage lending activities. HoMDA data analysis is one tool in assessing whether the impediments of discriminatory lending, redlining of minority and low income neighborhoods, and urban community disinvestment practices are occurring. Without further HoMDA research it would be inappropriate to make assertions about the occurrence of discriminatory lending practices in Ada and Canyon Counties. If HoMDA data research is to be conducted, each individual financial institution must be contacted to request their HoMDA information. In addition, no known studies, surveys, or reports were available to conduct any review of insurance practices.

a. Action Goal: Establish a policy and a system for identifying, obtaining, sharing and maintaining fair housing complaint data. This should make data available to lenders, realtors, local governments, and housing providers. Participants in this plan agree to provide their data upon request to the other participants.

b. Action Objective(s): The Idaho Human Rights Commission (IHRC), Idaho Housing and Finance Association (IHFA), and the Idaho Department of Commerce (IDOC) should identify what fair housing data each agency collects and maintains. In addition, IHRC, IHFA, and IDOC should identify which other related data types would be most efficiently and appropriately collected and maintained by each agency to have an effective fair housing data base.

(1) In conjunction with the fair housing data base action objectives, contact and establish agreements among sources of fair lending information including, but not limited to, the Federal Reserve Bank and the Federal Deposit Insurance Corporation, and Idaho lending institutions. These agreements can also include those organizations and agencies which maintain fair housing complaint data including, the U.S. Department of Housing and Urban Development, Idaho Human Rights Commission, and the Idaho fair Housing Council.

(2) Develop a consensus on data collection, maintenance, analysis, and dissemination methods.

(3) Establish shared commitments concerning staff contacts and required resources to assure an ongoing cooperative effort.

c. Progress Schedule: Identify and delineate fair housing complaint and other data needs and responsibilities between HUD, IHFC and IHRC.

d. Implementation Lead and Support: IHRC, IHFA, and IDOC.

e. Resource Commitments: IFHAC member organizations, agencies and lending institutions should provide appropriate resources as needed.

f. Monitoring and Evaluation:

(1) Annual Action Plan performance review and assessment of progress by the Idaho Fair Housing Advisory Committee.

(2) Annual monitoring site visits by the U.S. Department of Housing and Urban Development.

Fair Housing Action Plan

6. Impediment: EDUCATION FOR PROPERTY MANAGERS An impediment to fair housing exists because there is no formal fair housing educational process for property managers.

a. Action Goal: The Idaho Fair Housing Advisory Committee (IFHAC) will support efforts to establish self-certification for property managers in the State of Idaho. Qualifications under such a program should include substantial education and training concerning Federal and state fair housing laws.

b. Action Objective(s): The IFHAC and its member organizations and agencies when and where appropriate, will utilize their outreach and education programs to inform communities, housing professionals and providers, and decision makers throughout the state of the need and benefits of certified property managers.

c. Progress Schedule: Continuing outreach/education efforts.

d. Implementation Lead and Support: The IFAC's private housing industry member organizations with support, as needed and appropriate from IHRC, IDOC, IHFA, IHFC, and Idaho Legal Aid Services.

e. Resource Commitments: IFHAC private housing industry member organizations.

f. Monitoring and Evaluation:

(1) Annual Action Plan performance review and assessment of progress by the IFHAC.

(2) Internal agency reviews by IHFA, IDOC, and IHRC.

(3) Annual monitoring site visits by HUD.

(4) Passage of the self-certification requirements for property managers.

Fair Housing Action Plan

7. Impediment: TECHNICAL ASSISTANCE FOR LOCAL OFFICIALS The lack of education and technical assistance for many of Idaho's local elected officials, and the planning and zoning, building inspection, and legal staff that they depend on is believed to constitute an impediment to fair housing.

a. Action Goal: Develop a continuous fair housing outreach and education process for city and county government officials including public housing authorities. This goal is intended to build local capacity in understanding and dealing with fair housing matters.

b. Action Objective(s): Provide fair housing outreach and education through a broad range of sources including, but not limited to:

- (1) Association of Idaho Cities', Idaho Association of Counties', and Idaho Planning Association Conferences and Seminars;
- (2) Technical Assistance;
- (3) Training Workshops for Planning, Zoning, and Building Officials;
- (4) Newsletters and Magazines;
- (5) Fair Housing Resource Guides; and
- (6) Local Fair Housing Resolutions.

c. Progress Schedule: Coordinate the objectives identified above with existing conferences, seminars, and workshops. Establish an ongoing relationship with these event sponsors and their publications to assure an ongoing program of fair housing outreach and education.

d. Implementation Lead and Support: Association of Idaho Cities and Idaho Association of Counties with support from the (IHRC), the Idaho Fair Housing Council IFHC, the IDOC, IHFA.

e. Resource Commitments: Funding support from HUD programs, technical and training assistance IHRC, IFHC, IDOC, and IHFA.

f. Monitoring and Evaluation:

- (1) Annual Action Plan performance review a of progress by the IFHAC.
- (2) Internal agency performance reviews by IHFA, IDOC, and IHRC.
- (3) Annual monitoring site visits by HUD.

Fair Housing Action Plan

8. Impediment: TENANT EVICTION The many low income housing and protected class advocates perceive the provisions of Idaho law which allow for tenant eviction with no cause, constitutes an impediment to fair housing.

a. Action Goal: Support a change in Idaho law to require, at minimum, good cause for evictions from mobile home parks. This is the law in many states. Alternately, amend Idaho law to allow recognition of retaliatory eviction as a statutory defense in all eviction cases. This would allow a tenant to defend against an eviction if the tenant can show the eviction was for a retaliatory purpose because the tenant complained about housing discrimination, needed repairs, mismanagement, etc.

b. Action Objective(s): The IFHAC and its member organizations and agencies when and where appropriate, will utilize their outreach and education programs to inform communities, housing professionals and providers, and decision makers throughout the state of the need and benefits of “for cause” amendments.

c. Progress Schedule: Ongoing outreach/education efforts.

d. Implementation Lead and Support: Lend private housing industry member organizations with support, as needed and appropriate from IHRC, IDOC, IHFA, IFHC, and Idaho Legal Aid Services.

e. Resource Commitments: IFHAC private housing industry member organizations.

f. Monitoring and Evaluation:

(1) Annual Action Plan performance review and assessment of progress by the Idaho Fair Housing Advisory Committee.

(2) Internal agency and legislative performance reviews by IHFA, IDOC, and IHRC.

(3) Annual monitoring site visits by HUD

(4) Passage of legislation requiring good cause for eviction.

Fair Housing Action Plan

9 Impediment: RESTRICTIVE PLANNING AND ZONING

Some local government actions have contributed to an exclusionary environment through the promulgation and enforcement of restrictive planning and zoning ordinances and practices. Such ordinances and practices may include, but are not limited to, a restrictive definition of family as an occupancy standard; restricting the housing types allowed within particular residential areas without regard to the reasonable accommodations; or other actions in disregard of the requirements of the fair housing laws. Many restrictions are enacted without understanding or investigating their potential impact on fair housing.

a. Action Goal: Promote fair housing policies and requirements in planning and zoning practices, building code review, and other decision making processes.

b. Action Objective(s): Develop and implement ongoing outreach and education workshops and printed materials for local governments, attorneys, chambers of commerce, and homeowners associations. Identify and quantify fair housing complaints due to various planning and zoning practices. Review zoning ordinances and relevant statutes.

c. Progress Schedule: Incorporate fair housing review as part of the Association of Idaho Cities and the Idaho Association of Counties technical assistance program. Consider fair housing and planning and zoning issues in ongoing local workshops and policy meetings, as appropriate. Develop and implement workshops for local governments, citizens, and other organizations.

d. Implementation Lead and Support: Association of Idaho Cities and Idaho Association of Counties with support from the IFHC, IDOC, IHFA. Also local neighborhood and homeowner associations.

e. Resource Commitments: Funding support from HUD programs, technical and training assistance IHRC, IFHC, IDOC, and IHFA.

f. Monitoring and Evaluation:

(1) Annual Action Plan performance review and assessment of progress by the Idaho Fair Housing Advisory Committee.

(2) Internal agency performance reviews by IHFA, IDOC, and IHRC.

(3) Annual monitoring site visits by the U.S. Department of Housing and Urban Development.

APPENDIX “A”

List of Fair Housing Plan Acronyms

A	=	Analysis of Impediments to Fair Housing Choice
CDBG	=	Community Development Block Grant
CHRB	=	Boise-Elmore Community Housing Resource Board
FHEO	=	Office of Fair Housing and Equal Opportunity (HUD)
FHIP	=	Fair Housing Initiatives Program
HoMDA	=	Home Mortgage Disclosure Act
HUD	=	U.S. Department of Housing and Urban Development
ICN	=	Idaho Citizens Network
IDOC	=	Idaho Department of Commerce
IFHAC	=	Idaho Fair Housing Advisory Committee
IFHC	=	Idaho Fair Housing Council
IHFA	=	Idaho Housing Finance Association
IHRC	=	Idaho Human Rights Commission
INHTF	=	Idaho New Horizons Task Force
NIMBY	=	Not In My Back Yard