

US, Department of Housing and Urban Developments Office of Policy Development and Research

The Local OHAS: A Preliminary Assessment of First Year Submissions



The Local CHAS: A Preliminary Assessment of First Year Submissions

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I. Purpose and Overview

The Office of Policy Development and Research in the U.S. Department of Housing and Urban Development (HUD) conducted an assessment of a sample of firstyear local government submissions of the Comprehensive Housing Affordability Strategy (CHAS) in January 1992. The purpose of this assessment was to determine how well communities complied with HUD's interim CHAS requirements, to assess the content of the first CHASes, to identify the level of effort associated with completing the CHASes, and to develop recommendations for the improvement of the regulations.

Specifically, the study provided a representative source of information for HUD's use in revising the local CHAS regulations in the spring of 1992. It provided a partial basis for addressing some of the key issues expressed in the comments HUD received on the draft CHAS regulations.

The methodology for the study, which is further discussed in appendix A, relied on a detailed content analysis of a random sample of 46 completed CHASes as well as supplementary information gathered from the sample jurisdictions. Supplementary data tables of results from the study are provided in appendix B. In addition, eight of the better CHASes were examined to determine how each community based its priorities and strategies on its unique shelter needs and market conditions. Appendix C summarizes this subanalysis.

The basic findings of the report are that: (1) virtually all jurisdictions made significant efforts in developing their CHASes despite the short timeframe and lack of current data; (2) a number of jurisdictions provided additional data and information beyond that suggested by HUD; (3) as was hoped, some jurisdictions with similar housing needs, yet different housing stocks and markets, developed distinctly different housing strategies; and (4) the CHAS regulations could be significantly improved.

This study also developed a useful methodology for future CHAS evaluations and monitoring, including baseline data on the first-year local CHASes.

II. Background

The 1990 National Affordable Housing Act (NAHA) requires that State and local governments prepare a Comprehensive Housing Affordability Strategy in order to be eligible to receive selected Federal housing assistance funds. The purpose of the CHAS is to serve as a policy guide for State or local action(s) concerning the provision of housing and related services to low- and moderate-income households.

Section 105 of NAHA states that: "The Secretary shall provide assistance directly to a jurisdiction only if:

- o the jurisdiction submits to the Secretary a comprehensive housing affordability strategy . . . ;
- o the jurisdiction submits annual updates of the housing strategy; and
- o the housing strategy, and any annual update of such strategy, is approved by the Secretary."

Section 106 of NAHA identifies HUD programs that require a local CHAS to be approved by HUD.¹

The FY 1992 CHAS submissions were guided by an interim rule, which was published February 4, 1991 (24 CFR Part 91) and instructions published by HUD on August 12, 1991. The statute and rule required that a CHAS include the following basic elements:

- o identification of housing needs,
- o setting of priorities and strategies, and
- o 5- and 1-year action plans that take into account available resources (Federal, State, local, and private) and existing institutional capacities.

The rule specified a number of subelements to be addressed, such as the descriptions of a jurisdiction's population, housing inventory, and market characteristics; identifications of shelter needs for the low-income, homeless, and special disabled populations; and identifications of policy barriers to affordable housing and fair housing initiatives.

Jurisdictions were required to submit a CHAS in order to receive FY 1992 funds; the recommended submission date was October 31. By January 15, 1992, approximately 450 of the expected 850 local jurisdictions had submitted their CHASes.

III. Findings

The findings from the CHAS assessment are presented under five headings:

- A. The CHAS as a Policy Document
- B. Local Housing Plans Prior to CHAS
- C. CHAS Contents
- D. Clarity of HUD's CHAS Instructions
- E. CHAS Preparation Effort

¹ They include the Community Development Block Grant program (CDBG), McKinney homeless grants; HOME; and HOPE I, II, and III funds. Programs that were not included under the CHAS requirement include public housing, Indian housing, and Section 8 assistance.

A. The CHAS as a Policy Document

The CHAS is to be a local policy document that identifies population needs for affordable housing, specifies strategies to efficiently and effectively meet those needs, and targets Federal, State, local, and private resources for strategy implementation. To be effective, a policy should have official status and citizen support, and be specific enough to guide actions and measure progress.

Endorsement of the Local CHAS. Though not formally required by HUD, 65 percent of the first-year sample CHASes were adopted by elected officials as a guide for local housing action. Another 20 percent of the jurisdictions indicated that their elected officials informally accepted the CHAS as their housing guide.

Given that HUD requires that the CHAS be completed as a precedent to continued community eligibility for many HUD programs, the high acceptance rate may reflect such incentives. When asked, however, 75 percent of the CHAS preparers said they considered the CHAS a useful guide for addressing community housing needs. Only 10 percent of 43 preparers said that their CHASes were not considered as local housing policy.

Citizen Participation. Jurisdictions were required to include in the CHAS narrative a description of the process involved in developing their CHASes. The only citizen participation that was required was a public hearing to review the completed CHAS.

The study found that most of the jurisdictions used some method to solicit input from citizens and housing and service providers early in the CHAS development process. The most popular forum for citizen comment, early in the CHAS development, was the public input meeting—used by 61 percent of jurisdictions. Other input techniques were task force/working groups—41 percent, and mail or telephone surveys of key community groups—33 percent. Ninety percent of the jurisdictions used one or more of the three methods.

The required public hearings were, however, poorly attended and not as productive as the CHAS task forces/working groups and public input meetings that were held earlier in the process. The median number of public comments included in the CHASes (a CHAS requirement) was 3, ranging from 0 to 78.

The most frequent participants in the CHAS development process, after a jurisdiction's community development and/or housing offices, were nonprofit organizations, which participated in nearly 90 percent of the CHAS development efforts. Public housing authorities (PHAs) were mentioned as participating in roughly half.

Monitoring. The specification of actions to meet housing needs was detailed enough in approximately 35 percent of the CHASes that they could be used for monitoring and for performance reports at year's end. The majority of the CHASes' priorities, measurable objectives, and implementation plans were too general to permit careful monitoring and performance assessments in FY 1993.

B. Local Housing Plans Prior to CHAS

The preparation of local housing plans is not a new concept. HUD has required limited forms of local housing planning for the last three decades: the 701 Comprehensive Planning Assistance Grant Program required a housing element; urban renewal and model cities' plans required housing elements; a Housing Assistance Plan (HAP) has been required under the CDBG program; and a Comprehensive Homeless Assistance Plan (CHAP) was required to receive funding for McKinney Act homeless programs. Some State governments require that local governments develop housing plans as part of their local planning process. Moreover, a significant number of local governments have developed their own housing data collection and analyses, independent of available national census data.

Previous Housing Plans. Nearly 45 percent of the jurisdictions that developed a CHAS reported some type of prior housing plan other than HUD's previously required HAP or CHAP. As of 1987, for example, the States of California, Florida, and Oregon already had State legislation that required comprehensive housing plans.² Jurisdictions from those States made up 26 percent of the sample.

Census and Local Housing Data. Jurisdictions were required by the regulations to present an array of information regarding housing and service needs, housing market conditions, and the housing inventory. While none of the sample CHASes met all of the requirements from the instructions, jurisdictions did a good job of meeting almost all the first-year requirements. For example, there were eight tables that jurisdictions could use with seven required to be completed in varying degrees. Fifty percent of the jurisdictions met the minimum requirements for all of the CHAS tables, and several went beyond them. Those that did not meet all of the table requirements generally only failed to complete a few required cells.

The 1980 census was the primary source of data for the tables. The biggest obstacle to more complete tables was the limited amount of 1990 census data available for this submission. Those jurisdictions that had developed housing planning documents prior to the CHAS usually included an extensive amount of data not required for the CHAS. Sixty-four percent of the jurisdictions included data and findings from local studies, providing a wider range of information on market areas than is available from

² So, Frank S. "Planning Agency Management" in <u>The Practice of Local Government Planning</u>, 2nd ed., Frank S. So and Judith Getzels, eds. Washington, D.C.: International City Managers Association, 1988.

the decennial census. Eighty percent provided estimates of the local homeless population.

Benefits of the Data/Tables Required. Fifty-one percent of the respondents from the telephone discussions felt that the data tables were helpful in framing an analysis or developing strategies. Of the 47 percent of the preparers that felt the data tables were not beneficial, 45 percent stated that the data tables indeed would be helpful when special tabulations of 1990 census data are provided by HUD in 1993.

C. CHAS Contents

Local jurisdictions are required by statute to address a number of substantive issues and topics in their CHASes. These include the extent of their housing needs, the significant characteristics of their local housing market conditions, their housing inventories, their priorities for investment and strategies in addressing those needs under local market conditions, and resources for implementation. The CHAS regulations further request that jurisdictions focus on several specific topics, including the very low- and low-income populations, homeless, those with special needs, barriers to affordable housing, and fair housing concerns.

The following section provides a brief discussion of how well each of these topics was addressed by the sample CHAS jurisdictions. Additional information on the CHAS content is provided in appendix B.

1. Needs Assessment. All jurisdictions identified some housing needs.³ The needs of renters were discussed by nearly every jurisdiction, especially the needs of low-income renters. Several CHASes discussed income or tenure groups (e.g., discussed low-income or renters) without specifically discussing the housing needs of those groups.

2. Market Conditions. The CHAS regulations provided little guidance to jurisdictions on how to describe the "significant characteristics" of their housing markets. As a result, many jurisdictions discussed only a minimum of such elements as population, number of owner- and renter-occupied units, home values, and contract rent.

Fewer than 75 percent of the sample provided trend data on population or housing. More than 60 percent discussed interactions among their economies, populations, housing costs, and needs.

3. Inventory. Although jurisdictions were required to discuss their current assistedhousing inventories, the sample CHASes only provided minimal narrative material.

³ Housing need is defined as a household with housing cost burden (rent or mortgage > 30% of income) and/or substandard housing (dilapidated structure, insufficient plumbing, health/safety problems) and/or overcrowding. Housing need included homelessness and special populations without shelter or services.

Among the 65 percent of the jurisdictions that indicated they had public housing stock, only 37 percent discussed the condition of those units, and 30 percent estimated the number currently requiring rehabilitation. Although required in the statute, only one-third of the jurisdictions with public housing inventory identified resident management initiatives.

4. Priorities and Strategies. HUD's instructions specified that priorities for investment should logically flow from a needs assessment and current market and inventory conditions mentioned above. Appendix C reports the results of an indepth examination of eight CHASes to assess relationships among needs, market conditions, and local priorities and strategies.

The top priorities identified by the sample jurisdictions were:

	Percent
o addressing the needs of the low income	93
o improving affordability	83
o ending homelessness	78
o meeting special population needs	74

Only 28 percent of the jurisdictions identified "worst case" households⁴ as a priority.

a. Very low- and low-income needs. It was intended that jurisdictions would develop their strategies from their priorities. The most frequently mentioned program strategies were:

	Percent
o rehabilitation of low-income units	92
o provision of rental assistance	80
o promotion of homeownership opportunities	74
o assistance to current homeowners	67
o new construction of low-income housing	66

The least frequently mentioned program strategies were:

o elimination of causes of racial/ethnic	Percent 19
concentrations	
o development of self-sufficiency programs	11
o alleviation of overcrowding	11

⁴ Unassisted renter households with income below 50% of the median with cost burden greater than 50%, severely substandard housing, or displaced from their homes.

The study identified some inconsistencies between the needs and the priorities identified by some jurisdictions. The greatest discrepancy was that although 40 percent said there was a need to assist first-time homebuyers, more than 70 percent selected that group for priority assistance.

b. The homeless. Nearly all of the jurisdictions, 98 percent, provided some detail on homeless needs. Seventy-one percent of the jurisdictions discussed their homeless populations by special needs categories.

Initiatives for the homeless were mentioned by approximately half the jurisdictions. The frequency of strategies mentioned for these groups were: transitional shelter (56 percent), emergency shelter (48 percent), and homelessness prevention (39 percent).

c. Other needs for supportive housing (not homeless). Eighty-three percent of the jurisdictions described the need for assistance of specific populations with disabilities that were not homeless. There was, however, some crossover and confusion between this population and the homeless with similar special problems such as mental illness or AIDS. Fifty-nine percent of the jurisdictions identified action plans to provide shelter/services to nonhomeless persons with special needs.

d. Barriers to affordable housing. Jurisdictions were to discuss public policies that affect the maintenance, improvement, and/or production of affordable housing and to define strategies to remove or ameliorate the negative effects of such policies. These public policies are frequently referred to as barriers to affordable housing. Most jurisdictions, 90 percent, addressed the barriers issue. Of those that addressed the topic, 75 percent of the sample CHASes indicated the existence of barriers, while the other 25 percent stated their jurisdictions had none. Just 22 percent included barrier removal among their One-Year Action Plan activities.

e. Fair housing. The statute required jurisdictions to certify that they would affirmatively further fair housing and specified that the annual performance report should include the racial and ethnic status of persons served. The regulations requested that needs be identified by race/ethnicity.

Few jurisdictions organized their needs, priorities, and actions along racial/ethnic lines. While all jurisdictions provided the required data on population by racial/ethnic categories, just 30 percent discussed priorities in terms of race or ethnicity, and only 15 percent listed activities in their One-Year Action Plan to address needs on racial/ethnic lines. There was more discussion about targeting geographic areas for action than populations by race/ethnicity. 5. Resources. Jurisdictions were asked to indicate the amount of funding they expected to receive from Federal, State, and local sources on a table titled "Anticipated Resources and Plan for Investment." All jurisdictions prepared the table. There was an average of 11 Federal programs identified for housing or service uses. Eighty percent of the jurisdictions identified the use of CDBG funds for housing, 70 percent expected to receive HOME funds, and 33 percent expected to apply for HOPE funds. Fifty-two percent of the jurisdictions included local funds in their plan, and nearly 60 percent indicated the use of State funds.

D. Clarity of HUD's CHAS Instructions

Important questions for the study included: How clear and logical were HUD's requirements and guidance for the first-year CHAS submissions? Specifically, did the jurisdictions respond as requested, and were the CHASes sharp?

Generally, jurisdictions organized their CHAS information following the order requested. More than 70 percent of the jurisdictions followed the 5-part format prescribed by HUD. Only 7 percent submitted, as permitted, their existing housing plans with a crosswalk to the required CHAS elements. None of the sample CHASes, however, met all of the instructions' detailed requirements for narrative content.

Despite the relatively high level of compliance, the sample CHASes had a number of problems with the required interim CHAS format. Many CHASes presented the required elements in the wrong locations and many were plagued by repetition. For example, 35 percent of the jurisdictions misplaced their community and market sections by combining them with their housing needs descriptions. There was considerable repetition between the Five-Year Strategy and the One-Year Implementation Plan because of a requirement for similar details in both sections. Sometimes, the required resources section was merged into the One-Year Plan.

In addition, several CHASes did not distinguish clearly between the "Special and Supportive Needs Population" of the homeless and the "Supportive Housing Needs for Others with Special Needs" (not homeless). The use of the term "special needs" for both sections may have been a cause for the confusion.

In general, less than 35 percent of the One-Year Implementation Plans were fully developed in terms of specifying projects/activities, budgets, responsible parties, and schedules.

A number of jurisdictions made notable improvements to the required CHAS format. Thirty-three percent added an executive summary that greatly improved the elected officials' and citizens' ability to comprehend the CHAS. When the preparers were asked about the desirability of a summary, 80 percent said it would help. Also, more than 70 percent of the preparers were strongly in favor of the provision by HUD of a checklist/prescribed format that would clarify desired CHAS organization and assure inclusion of the key elements for HUD approval. However, jurisdictions also mentioned that they wanted the freedom to "personalize" the CHAS to their communities.

A fifth of the jurisdictions independently developed a remarkably consistent alternative format for listing and justifying their priorities clearly. For each priority, they spelled out their rationale and implementation strategies, as shown in table 1.

> TABLE 1 Basic Strategy Format Used by 20 Percent of FY 1992 Sample CHASes

> 1) Priority (and then under each priority) A. Five-Year Goal B. Rationale C. Strategy D. Resource

E. CHAS Preparation Effort

An important component of the study was to identify the amount of effort expended by local jurisdictions to develop a CHAS. The HUD CHAS instructions included specific format and table requirements for the submission of local CHASes. HUD initially estimated that it would require 31 staff days to complete a typical local CHAS.

The amount of effort expended to develop a CHAS and the size of the CHAS documents varied widely, as shown in table 2.

The median time to prepare a CHAS, including time spent by participants in the development and hearing process, was 48 person days. The average time was 87 days because of a few very staff-intensive efforts, some of which involved extra public hearings. The median time for preparation was 50 percent higher than HUD's original estimate of 31 days. However, many preparers commented that the CHAS was superior to the HAP.

The median length of a CHAS was 91 pages, including appendixes. The average length was 107 pages. There were a few very large documents, one as large as 365 pages.

	<u>Average</u>	Median	Range
Total time to prepare (staff days)	87	48	15-450
Time for primary preparer agency (staff days)	70	39	15-280
Time for other agencies (staff days)	16	0	0-200 ⁵
Total length (pages) (text & appendix)	107	91	23-365
Text length only (pages)	70	60	19-183

 TABLE 2

 Average Time to Prepare CHASes and Their Lengths

Sources: Followup conversations (n=43); document review of CHAS sample (n=46).

IV. Summary

The CHAS is to be a local housing planning process. The product is expected to improve over time as local governments and their citizens become more familiar with the CHAS process and obtain more data from the 1990 census.

This pilot study found that the majority of jurisdictions understand that CHAS is to be the local housing policy, and the preparers considered the CHAS exercise as a useful process to establish priorities with community consultation. While some objected to the amount of time and data sources required, other jurisdictions added additional housing assistance needs and data sources beyond the required/basic use of decennial census information.

The study found that there is considerable merit in requiring collaboration and consultation among local housing agencies and nonprofit entities at early stages in the design of the CHAS rather than at the conclusion of the process as is now required. It also indicates a need to further involve local PHAs and their programs in the planning process.

The substudy in appendix C confirms that the CHAS process can meet the congressional objective of encouraging flexible programmatic approaches to meet the

⁵ Fifty-five percent of the sample provided no estimate of the time spent by other agencies.

diverse needs of low- and moderate-income households under quite different housing market conditions. The subsample of jurisdictions (with similar population/housing needs yet very different housing stocks and market conditions) developed strategies appropriate to the communities.

However, the study identified a discrepancy between the local housing needs identified and the program priorities chosen in many CHASes. This allocation process warrants careful attention over the long term.

Some of the first-year CHASes were adequately detailed to function as useful guides to the actions that were planned to meet housing needs and permit yearend monitoring and performance reports. However, in the majority of the sample CHASes, priorities, measurable objectives, and implementation plans were too general to permit careful monitoring and performance assessments.

The study produced many recommendations for improvements to the final CHAS regulation, including changes in order, a consistent presentation format for priorities and strategies, and a sharper differentiation between the desired content for the Five-Year Strategy and the One-Year Implementation Plan.

Finally, the study demonstrated the feasibility and utility of using sample-based analyses as a means to reliably assess the content of the CHASes. The data collected will serve as a benchmark for subsequent evaluations of CHASes.

APPENDIX A

Methodology

This inhouse study relied on a content analysis of a random sample of first-year CHASes submitted to HUD Regional Offices as the basis for systematic data assessment. The methodology began with developing a CHAS review protocol based on HUD's CHAS interim rule and instructions. The protocol was pretested and subjected to consistency/reliability tests to establish that separate reviews of the same CHAS would result in similar findings. This assessment resulted in eliminating ambiguous items and refining or clarifying other protocol elements. The protocol was used to collect a total of 440 data elements per CHAS.

Once the protocol was complete, a random sample of 46 local CHASes was drawn by selecting 10 percent of the 459 jurisdictions that submitted CHASes to HUD prior to January 15, 1992. Another 400 jurisdictions were expected to submit CHASes by April 2, 1992. It should be noted that the sample CHASes might differ from the local CHASes submitted to HUD after January 15 because later submissions might reflect additional effort. However, later submissions might also represent smaller, less experienced jurisdictions.

Content analyses of local CHASes took an average of 3 hours each. Following the review of the CHASes, telephone discussions were held with 43 of the CHAS preparers to clarify specific aspects of their CHAS submissions.

Finally, a subsample of eight CHASes was examined indepth to evaluate the reasoning used in identifying priorities and allocating investment among different activities and housing needs. The eight selected for indepth review contained well-developed strategy sections but varied in their local housing market conditions, population sizes, and geographic locations.

Table A shows the sample distribution compared to the total number of CDBG jurisdictions by HUD region, while table B shows the population size, as of 1990, for the CHAS sample jurisdictions. Population size varies, with jurisdictions of more than 200,000 heavily represented. Eighty percent of the jurisdictions were cities; 20 percent were counties. All 9 of the counties had populations greater than 200,000.⁶

⁶ Urban counties must have a population greater than 200,000 to qualify as a CDBG entitlement jurisdiction, while cities need only to have a population greater than 50,000.

	Number in Sample/ Number of CDBGs	
Region	Jurisdictions	Percent ⁷
I.	3/ 70	4.3
п.	5/ 92	5.4
ш.	2/ 77	2.6
IV.	11/139	7.9
V.	11/173	6.4
VI.	4/ 89	4.5
VII.	2/ 28	7.1
VIII.	1/ 31	3.2
IX.	6/154	3.9
Х.	1/ 29	3.4

TABLE A Geographic Distribution of Sample CHASes by HUD Region

TABLE B			
CHAS Sample and Total Population			

Size of	Number in Sample/ Number of CDBGs	
Population	Jurisdictions	Percent
<50,000	7/224	3.1
50,000 < x < 100,000	16/342	4.7
100,000 < x < 200,000	5/117	4.3
>200,000	18/204	9.0

The exploratory nature of this content analysis and the relatively small sample size make it problematic to draw robust conclusions concerning the findings from this analysis. Nevertheless, the results do indicate certain clear trends or patterns that illustrate or document the probable responses of the universe of local CHAS submissions for 1992. This study did not address the complex and quite different problems associated with State CHASes.

⁷ Because only 459 of the estimated 910 jurisdictions had submitted CHASes as of 1/15/92, the percents of CHASes are all under 10 percent.

APPENDIX B

LIST OF TABLES

- Table 1 Participation of Community Organizations in CHAS Development
- Table 2 Data Sources
- Table 3 Profile of Community Population, Housing, and Other Market Data
- Table 4 Changes in Key Housing Needs
- Table 5 Components of Housing Need
- Table 6 Housing Needs by Income and Tenure
- Table
 7 Priorities by Income and Tenure
- Table 8 Housing Needs and Priorities by Household Type
- Table 9 Strategies for Acquisition, Construction, Rehabilitation, and Energy Efficiency
- Table 10 Inventory of Homeless Facilities
- Table 11 Homeless Population Characteristics
- Table 12 Homeless Population Groups Specified as Priorities
- Table 13 Special Needs Population (Not Homeless) Facilities Inventory
- Table 14 Special Needs Population (Not Homeless) Groups Discussed
- Table 15 Special Needs Population (Not Homeless) Groups Specified as Priorities
- Table 16 Local Barriers to Affordable Housing
- Table 17 Institutions Involved in Five-Year Strategy Implementation

Unless otherwise noted, all tables are based on a sample size of 46 CHASes.

TABLE 1 PARTICIPATION OF COMMUNITY ORGANIZATIONS IN CHAS DEVELOPMENT Frequency Mentioned by CHAS Sample

Organization	Percent
City agencies	89
County agencies	53
State agencies	42
Council of governments	27
Public housing authorities	49
Nonprofits	87
For profits	31
Lending institutions	22

TABLE 2DATA SOURCES1Frequency Mentioned by CHAS Sample (percents)

	<u>Needs</u>	<u>Market</u>
HAP	92	N.A.
1980 census	61	83
1990 census	29	74
AHS data	8	7
Local source	42	64

¹ Jurisdictions expressed a frustration over the lack of 1990 census data. This table shows the variety of sources of data that jurisdictions used in the Needs Assessment and Market and Inventory sections. Fifty-four percent of the jurisdictions used more than one source of data for the needs section, while 87 percent used more than one source for the market section.

TABLE 3PROFILE OF COMMUNITY POPULATION, HOUSING,
AND OTHER MARKET DATA2Frequency Mentioned by CHAS Sample (percents)

				Point in		
Comm	unity Characteristics	Pre-1985 ³	<u>Post-1985</u>	<u>Time</u> ⁴	<u>Trends⁵</u>	<u>Future</u> ⁶
1. Tot	al population	74	91	93	72	26
	mber of households	30	57	57	30	15
3. Ave	erage household size	41	65	65	41	15
	al number of housing units	50	85	89	46	17
а.	renter occupied	43	61	72	33	7
ь.	owner occupied	43	61	72	33	9
5. Nu	mbers of units by types					_
a.	single family	26	67	72	22	9
b.	duplex & triplex	9	17	24	2	0
с.	multifamily	24	48	52	20	9
	i. condominiums	4	15	17	2	4
	ii. co-ops	0	0	0	0	2 2
	iii. rentals	7	11	15	2	
d.	mobile homes	17	26	30	13	7
e.	SROs	0	7	7	0	2
6. Qu	ality of housing					
a.	age of stock	22	39	50	11	0
b.	numbers needing	24	52	67	9	2
	rehabilitation					
7. Ho	me values	35	76	83	28	4
	ntract rents	24	70	76	17	2
	st burdens of rental housing	13	35	41	7	2
10. Cos	t burdens of owner housing		26	28	4	2
11. Ove	rall vacancy rate	20	63	65	17	2 2 2 2 2 4
а.	vacancy rate—for sale	9	35	37	7	2
b.	vacancy rate—for rent	15	50	52	13	4
	d availability/cost for					
ם	ew housing	2	37	37	2	11

³ "Pre-1985" and "Post-1985" were used instead of 1980 and 1990 in order to encompass local studies that took place in other years, while still distinguishing between 1980 and 1990 census data.

² The interim rule required jurisdictions to discuss their housing markets in terms of supply, demand, and cost of housing. The reviewers examined which community characteristics were cited to achieve that goal and what years of data were used.

⁴ Point in Time indicates the number of jurisdictions that discuss the item at least once for any time period.

⁵ Percent of jurisdictions that discussed the item in both Pre-1985 and Post-1985.

⁶ The percent of jurisdictions that made projections for that market characteristic.

TABLE 4 CHANGES IN KEY HOUSING NEEDS⁷ Frequency Mentioned by CHAS Sample

Subject Area	Percent
Supply of rental housing for low-income people	74
Opportunities for low-income ownership	67
Homelessness	43
Shelter needs of the "hard to house"	33
Overcrowding	30

TABLE 5COMPONENTS OF HOUSING NEED*Frequency Mentioned by CHAS Sample (percents)

Subject Area	CHAS <u>Addressed</u>	Priority Identified
Affordability	89	83
Substandard	72	78
Overcrowding	52	13

⁷ This table shows the number of jurisdictions that noted the changes in their communities regarding the key housing issues. Jurisdiction identification of these trends could help in the planning process.

⁸ Affordability, substandard conditions, and overcrowding are issues used as the general measures of housing need. Reviewers noted that if the CHASes discussed these issue areas, the jurisdictions did not necessarily indicate the item as a problem in the community.

TABLE 6 HOUSING NEEDS BY INCOME AND TENURE⁹ Frequency Mentioned by CHAS Sample¹⁰ (percents)

	<u>Renters</u>	<u>Owners</u>	First-Time <u>Homebuyers</u>	<u>Overall</u>
Overall	83	46	39	
Very Low-Income	61	24	15	78
Low-Income/ Other Low-Incom	72 e	28	20	85
Moderate-Income	46	22	13	57

TABLE 7 PRIORITIES BY INCOME AND TENURE¹¹ Frequency Mentioned by CHAS Sample (percents)

Ī	Renters	<u>Owners</u>	First-Time <u>Homebuyers</u>	<u>Overall</u>
Overall	89	65	70	
Very Low-Income	63	26	15	74
Low-Income/ Other Low-Income	74 ?	41	48	93
Moderate Income	17	22	28	50

⁹ This table shows the percent of jurisdictions that discussed the housing needs of a group by income and/or tenure. Jurisdictions were included as discussing the housing needs of a group even if the CHAS indicated the group had no need.

¹⁰ To be counted, a numerical estimate was not needed; a narrative was sufficient.

¹¹ A jurisdiction had to identify the group in the narrative as a priority for investment for it to be counted.

TABLE 8 HOUSING NEEDS AND PRIORITIES BY HOUSEHOLD TYPE Frequency Discussed by CHAS Sample (percents)

	Housing Need	
Household Type	Discussed	Priority
Single-parent families	33	20
Small families	52	20
Large families	52	33
Elderly	87	63
Disabled	72	22
Worst case	48	· 28

TABLE 9 STRATEGIES FOR ACQUISITION, CONSTRUCTION, REHABILITATION, AND ENERGY EFFICIENCY Frequency Mentioned by CHAS Sample (percents)

<u>Strategies</u>	Mentioned ¹²	Specific ¹³	<u>Total</u>
Acquisition of housing for low-income use	24	13	37
New construction of low-income housing	33	33	66
Rehabilitation of low-income units	e 35	57	92
a. moderate rehabilitation	4	20	24
b. substantial rehabilitation	n 4	13	17
Evaluating and implementin programs to promote energy efficiency of housing for lower income households	-	13	35

¹² Mentioned: If a jurisdicition mentions the item as a strategy but does not elaborate.

¹³ Specific: If a strategy is defined—explaining who, what, when, or where.

TABLE 10 INVENTORY OF HOMELESS FACILITIES¹⁴ Frequency Mentioned by CHAS sample

Service/Shelter	Percent
Number of emergency shelters and/or beds	78
Number of transitional shelters and/or beds	67
Day shelters (capacity)	28
Soup kitchens (capacity)	26
Vouchers programs for shelter, meals, or services	28
Social service programs for the homeless (description)	59
Homeless prevention programs (description)	41

TABLE 11

HOMELESS POPULATION CHARACTERISTICS¹⁵ Frequency mentioned in CHAS sample

Percent
54
54
48
48
35
13
13
11
9

¹⁴ Jurisdictions had to provide a numerical estimate to be counted. Jurisdicitions that said they had none were counted.

¹⁵ A jurisdiction only had to mention the group as part of its homeless population.

TABLE 12 HOMELESS POPULATION GROUPS SPECIFIED AS PRIORITIES Frequency Mentioned by CHAS sample

Special Populations	Percent
Mentally ill	22
Substance abuse	17
Victims of domestic violence	7
Families with children	7
Veterans	4
Developmentally disabled	2

TABLE 13

SPECIAL NEEDS POPULATION (NOT HOMELESS) FACILITIES INVENTORY Frequency Mentioned by CHAS Sample

<u>Categories</u>	Percent
Developmentally disabled	37
Estimates of long-term care	
facilities for victims of AIDS	26
Shelter cpacities for victims	
of domestic violence	24
Shelter capacities for substance	
abusers	24
Nursing home capacities	15
Foster care	13

TABLE 14

SPECIAL NEEDS POPULATION (NOT HOMELESS) GROUPS DISCUSSED Frequency Mentioned by CHAS Sample

Category	Percent
Mentally ill	64
Persons with AIDS	58
Physically disabled	56
Developmentally disabled	53
Frail elderly	42
Families in self-sufficiency	
program	19

TABLE 15 SPECIAL NEEDS POPULATION (NOT HOMELESS) GROUPS SPECIFIED AS PRIORITIES Frequency Mentioned by CHAS Sample

Percent
28
28
22
20
4

TABLE 16 LOCAL BARRIERS TO AFFORDABLE HOUSING DISCUSSED¹⁶ Frequency Mentioned by CHAS Sample (n=40)¹⁷

Barriers	Percent
Zoning	59
Building codes	54
Fees and charges	41
Tax policies	17
Growth limits	17
Adequate public facilities	
ordinances	12
Limits on number of building	
permits	7

¹⁶ Barriers to affordable housing are public policies that affect the maintenance, improvement, and/or production of affordable housing.

¹⁷ Only 40 jurisdictions discussed barriers, so the barriers discussed are based on those 40.

TABLE 17 INSTITUTIONS INVOLVED IN FIVE-YEAR STRATEGY IMPLEMENTATION¹⁸ Frequency Mentioned by CHAS Sample (percent)

Institution <u>M</u>	Mentioned Named Role Defined		
Local departments of housing/community	90	90	67
development agencies Public housing authorities	5 9	59	39
Nonprofit groups	76	52	35
State housing	30	28	17
organizations			
Foundations	17	9	7
Lending institutions	46	20	20
Private-for-profits	39	11	17

¹⁸ This table shows to what extent jurisdictions identified the organizations that were to implement the 5-year strategies and what specific roles they would play.

APPENDIX C

Substudy of Priority Decisions

An indepth examination of eight CHASes with well-thought-out strategy sections demonstrated that jurisdictions could and did respond to the statute's directive of indicating how market characteristics would influence decisions about the use of housing funds. Most in this group gave their local market characteristics careful consideration in determining priorities for investment to meet identified needs. Although needs were quite similar across the eight, with severe rent burdens on the lowest income renters as consistently cited as the most pressing problem, the characteristics of their markets and housing inventories varied markedly. Conditions among the eight ranged from population loss to rapid growth, from prosperity to economic decline or recent downturn, from old housing with high rehabilitation needs to a newer stock, and from low to high vacancy rates.

The priorities for investment varied as did the actions, ranging from rental assistance and supportive services to assistance for first-time buyers and rehabilitation for older owners. Review of the reasoning for these decisions given in the CHAS narratives suggested that the activities chosen were indeed appropriate in light of local market conditions and available resources. Because these communities seem well on their way toward meeting Congress' intention—in giving local governments more flexibility and responsibility—of achieving national housing goals more effectively and efficiently within the context of different local markets, this review suggests that such careful analysis can become more common in future CHASes as jurisdictions benefit from better data, experience, and citizen participation.

