



**MaineHousing**  
**Maine State Housing Authority**

STATE OF MAINE  
ANALYSIS OF IMPEDIMENTS  
TO  
FAIR HOUSING CHOICE

October 2019

If you feel you have experienced discrimination  
in the housing industry, please contact:

Maine Human Rights Commission  
Office of the Commission  
51 State House Station  
Augusta, Maine 04330  
Telephone: 207-624-6290  
e-mail: [info@mhrc.maine.gov](mailto:info@mhrc.maine.gov)

Boston Regional Office of FHEO  
U.S Department of Housing and Urban Development  
Thomas P. O'Neil, Jr. Federal Building  
10 Causeway Street, Room 321  
Boston, Massachusetts 02222-1092  
Telephone: (617) 994-8300  
Toll Free: (800) 827-5005  
TTY: (800) 877-8339

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# Analysis of Impediments to Fair Housing Choice (AI)

Jurisdiction: Maine

Date: October 4, 2019

## **Executive Summary**

### **Overview**

The State of Maine is committed to affirmatively furthering fair housing. As a recipient of federal housing funding from the U.S. Department of Housing and Urban Development (HUD), Maine is required to analyze impediments to fair housing choice and then take action to overcome identified impediments. Maine's Analysis of Impediments to Fair Housing (AI) is intended to satisfy this requirement and to ensure that barriers to full and equal access to safe, decent, affordable housing are addressed.

HUD defines impediments to fair housing choice as set forth in local, state and federal law. In Maine, impediments include:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices (direct discrimination).
- Any actions, omissions, or decisions which have the effect of restricting housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin (indirect discrimination).

The State AI is intended to:

- Serve as the substantive, logical basis for housing planning and development;
- Provide essential and detailed information to policymakers, administrative staff, housing providers, lenders, and fair housing advocates; and
- Assist in building public support for fair housing efforts.

### **Lead Agency**

The Maine State Housing Authority (MaineHousing) is responsible for the preparation and implementation of the AI.

## **Consultation**

Over the course of the past year, MaineHousing has held focused discussions with our partners and others about affordable housing and impediments to that housing. Below is a list of topics discussed and the organizations participating in those discussions.

### **1. Homeless, Hard to House Populations**

- Maine's Continuum of Care
- Directors of Maine's Homeless Shelters
- Publicly funded institutions and systems of care including:
  - Domestic Violence providers

### **2. Affordability**

- Maine Affordable Housing Coalition
- Business and Civic Leaders
- Public Housing Authorities
- Efficiency Maine
- Housing Developers

### **3. Community Development**

- Local Governments
- Maine Municipal Association
- Maine Community Development Association
- Maine Department of Economic and Community Development
- Maine Association of Planners
- Public Housing Authorities
- Maine Chapter of the American Association of Retired Persons

### **4. Low Income/Special Needs Consumers**

- Area Agencies on Aging
- Maine Council to End Domestic Violence

### **5. Protected Class Members, Fair Housing**

- Maine Human Rights
- Pine Tree Legal
- Disability Rights Council
- Maine Department of Health and Human Services
- Equality Maine

### **6. Housing Quality**

- Maine Community Action Agencies

## Methodology

The methodology for the State of Maine AI included the following:

- Analysis of the Legal Framework under which Fair Housing Laws are Enforced.
- Summary of Fair Housing Data Findings and Enforcement
- Review of Demographics, Income, and the Residential Housing Market
- Identification of Impediments to Fair Housing Choice
- Development of an Action Plan

## Identification of Impediments

Concerns and potential impediments:

- A concern is an issue that may create an impediment.
- An impediment has the effect of limiting the availability of housing choice on the basis of race, color, sex, sexual orientation, physical or mental disability, religion, ancestry, national origin or familial status.

Based on the research conducted for the State of Maine AI, MaineHousing found the following potential concerns and impediments to fair housing.

1. **Lack of affordable housing.** Maine is experiencing shifts in the affordability of housing. Homeownership is becoming increasingly unaffordable while renting is becoming less affordable. As more people move to certain regions or communities in Maine, both the availability and affordability of housing in these areas are declining.
2. **Racial, ethnic and cultural barriers.** While Maine's population is predominantly white, there has been a recent increase in minority populations.
3. **Community planning and zoning decisions that impede affordable housing.** The demand for affordable housing in certain regions of the state is challenging local governments to re-examine planning and zoning policies and regulations.
4. **Lack of availability and access to housing for disabled individuals.** The need for accessible housing will continue to increase as a result of an aging population, coupled with a disability rate higher than the national rate.
5. **Limited access to neighborhood opportunities and community assets.** Changing demographics and mobility trends underscore the need for housing to be accessible to community assets.
6. **Lack of understanding of fair housing and affirmatively furthering fair housing.** Educational efforts need to continue to assist public and private entities comply with state and federal laws regarding housing discrimination.

## Legal Framework

The Maine Human Rights Act (the *MHRA*) embodies the State's fair housing and accessibility laws. The MHRA is certified as substantially equivalent to Title VIII of the Civil Rights Act of 1968, as amended (the *Fair Housing Act*) pursuant to 24 CFR Part 115. The Maine Human Rights Commission (the *Commission*) administers the MHRA and, as the State's certified agency, participates in and receives funding under the Fair Housing Assistance Program to investigate and process discrimination complaints and to provide training and technical assistance under the Fair Housing Act. The MHRA is also certified as equivalent to the Americans with Disabilities Act of 1990 (*ADA*) pursuant to 28 CFR Part 36, Subpart F.

The State of Maine Analysis of Impediments to Fair Housing Choice dated February 2016 (*2016 AI*) provides a comprehensive analysis of the differences between the MHRA and federal accessibility laws. [http://www.mainehousing.org/docs/default-source/policy-research/Federal-Funds/analysis-of-impediments-to-fair-housing.pdf?sfvrsn=34e4a715\\_9](http://www.mainehousing.org/docs/default-source/policy-research/Federal-Funds/analysis-of-impediments-to-fair-housing.pdf?sfvrsn=34e4a715_9). The following is a summary of the changes in State law since then.

- **Service Animals and Assistance Animals**

Service animals and assistance animals continue to be a significant issue and source of contention among the disability community, landlords, and businesses. Disability discrimination is the largest basis for housing discrimination complaints filed with the Commission and many of these complaints involve service animals or assistance animals.

From 2008, when service animals were first addressed in State law, to 2011, the definition and protections for service animals were the same for both housing and public accommodations. A service animal was any animal that a qualified provider determined was necessary to mitigate the effects of a physical or mental disability or was individually trained to do work or perform tasks for the benefit of an individual with a physical or mental disability. In 2011, the Legislature bifurcated the definition of "service animal" and narrowed the definition for purposes of public accommodations to a "dog" that is individually trained to do work or perform tasks for the benefit of a person with a disability in order to bring the definition into line with the ADA. The term "service animal" with its historic definition was retained for purposes of housing. Defining the term "service animal" differently; for public accommodations led to confusion and increased claims of misrepresentation of service animals in public accommodations.

In 2015, several pieces of legislation were submitted to the Maine Legislature concerning service animal training and certification to address these perceived abuses. The Legislature, through Resolve Chapter 36 enacted July 27, 2015, established a task force to study training requirements, certification, the need for public education, and housing issues related to service animals. The task force report included recommendations that were implemented as follows.

- Certain statutory changes were enacted by 2015 Public Law Chapter 457, effective July 29, 2016. The term “service animal” with respect to housing was replaced with the new term “assistance animal.” The civil violation for misrepresentation of service animals and assistance animals was clarified to specifically include (1) the false certification of an animal as a service or assistance animal, (2) providing a false certification to another person, (3) fitting an animal with a harness, collar, vest or other sign that an animal is a service or assistance animal when it is not, and (4) representing an animal as a service or assistance animal when it has not completed training, and the monetary penalty was increased to \$1,000. Municipal license fee waivers were retained for both service animals and assistance animals, but a separate application form is required for each to avoid the misuse of the “service animal” waiver to permit access to public accommodations by assistance animals. The protections for pedestrians with “service animals” and the allowance for “service animals” in food stores were not extended to assistance animals.
  
- The task force acknowledged that a mandatory system for certifying trained service animals would violate federal law, but considered a voluntary system. Ultimately, the task force did not recommend a voluntary system, citing concerns about the lack of a statewide or national administering body, accepted standards for certification, fair testing practices, and funding which would be burdensome on persons with disabilities and the State. However, the task force recommended and the Legislature sent a letter to the State’s Congressional delegation urging the federal government to find ways to discourage and institute federal penalties for misrepresentation of service animals.
  
- The task force recommended a public education program and campaign on service animals and assistance animals, including a new public information officer position at the Maine Human Rights Commission to coordinate the effort, develop a website and instructional materials, and provide technical assistance. Model policies, signs, and verification forms were included in the task force report. The public information officer was not realized because of political and budgetary constraints, but the Commission developed video and informational brochures on service animals and assistance animals and posted them on the Commission’s website. The brochures along with state law and federal guidance on service animals are also posted on the State Legislature’s website. The Commission continues to provide public information and technical assistance, including a recent collaboration with MaineHousing to provide guidance to emergency shelters.

New protections for landlords were adopted by 2017 Public Law Chapter 61, effective November 1, 2017. Under the new law, landlords and their agents do not have any civil liability for personal injury, death or property damage caused by assistance animals except in cases of gross negligence, recklessness or intentional misconduct by the landlord or agent or with respect to assistance animals owned by the landlord or agent.

- **New Accessibility Standards – MUBEC and MUBC**

The State has historically required more accessible housing than federal law, including the Fair Housing Act, the ADA, and Section 504 of the Rehabilitation of Act of 1973 (*Section 504*). Continuing this tradition, the State for the first time adopted accessibility requirements as part of the State’s building and energy codes last year. Effective January 28, 2018, the State updated the Maine Uniform Building and Energy Code (*MUBEC*) and the Maine Uniform Building Code (*MUBC*) to include the 2015 International Building Code (*IBC*) and the 2015 International Existing Building Code (*IEBC*) without excluding the accessibility provisions. In previous updates of MUBEC and MUBC, the accessibility provisions of the version of the IBC and the IEBC adopted were specifically excluded.

This change is significant in several respects. Until now, private multifamily housing with 4 or more units that is newly constructed, or in the case of State law substantially rehabilitated, only had to be adaptable (features that can easily become accessible as needed) under the Fair Housing Act and the State’s equivalent requirements. In those communities subject to MUBEC or MUBC (those with a population of 4,000 or more and communities that voluntarily adopted either code), private multifamily level now must comply with accessibility requirements similar to the ADA. These requirements apply to new construction and to the repair, alteration (any level of alteration), change of occupancy, addition and relocation of existing buildings or structures. Two fundamental principles of the requirements are (1) mainstreaming (the concept that persons with disabilities should not be singled out and everyone can benefit from accessibility features, particularly aging populations), and (2) existing housing will become fully accessible over time as upgraded. Also, for the first time building code officials have enforcement authority with respect to accessibility requirements in the State.

While the change will expand the availability of accessible housing in Maine, it exacerbates a problem identified in the 2015 AI. MUBEC and MUBC do not exclude housing and facilities that are already subject to the ADA. Housing funded by MaineHousing is subject to Title II of the ADA (applies to State-assisted activities) and shelters and certain supportive facilities are subject to Title III of the ADA (public accommodations). MUBEC and MUBC add yet another layer of accessibility requirements on housing that is already subject to multiple federal and State requirements.

Most of the housing funded by MaineHousing is subject to the ADA, Section 504, and more restrictive requirements under the State’s accessibility requirements for multifamily housing (similar to the Fair Housing Act) and publicly funded housing. The 2015 AI describes the differences between the MHRA and these federal requirements, the most significant of which are set forth below.

- The term “new construction” for purposes of the accessibility requirements for multifamily housing and public housing under the MHRA, 5 M.R.S.A. §4582-C(3), was expanded in 2011 to include more than housing for first occupancy as defined under the Fair Housing Act. It also includes the reuse of formerly vacant buildings (usually historic) and other substantial rehabilitation (i.e. rehabilitation equal to 75% or more of the replacement cost of the housing). This distinction has the most impact with respect to the requirements for multifamily housing, which like the Fair Housing Act require all units to be adaptable.
- In public housing (projects with any type of public funding, such as low-income housing tax credits and government funding) with 20 or more units on a parcel of land, at least 10% of the ground level units and 10% of the upper floor units in a building with an elevator must be accessible (or must have accessible routes, accessible doors and adaptable bathrooms if alterations that do not reach the level of new construction), whereas only 5% of all units in a project must be accessible under Section 504 and the ADA.
- In 2011, the accessibility standards for multifamily housing and public housing were changed to the most current version of ANSI A117.1 as designated in the Commission’s rules, which for multifamily housing is the requirements for Type B units in ICC/ANSI A117.1 – 2009 (provides greater accessibility than the safe harbors under the Fair Housing Act), and for public housing are the requirements for Type A units in ICC/ANSI A117.1 – 2009 (similar to the federal standards for Section 504 and the ADA, but less restrictive in some cases).

The application of all of these different federal and state accessibility requirements to MaineHousing-funded housing can be complicated and confusing for developers and their design professionals. This complexity causes confusion about which requirements apply and can lead to noncompliance, which is a barrier to accessible housing. MUBEC and MUBC, which is in effect in most of the communities where MaineHousing funds housing, add another layer of complexity, particularly since there are subtle differences between the scoping requirements and accessibility standards in the ADA and those in MUBEC and MUBC.

- **Maine Human Rights Commission**

In October 2015, Governor LePage issued an executive order alleging that Maine’s business community perceived the Commission to be biased toward complainants. The executive order established a Review Panel (consisting of attorneys for respondents and complainants, a best administrative practices expert, and representatives for business, landlords, Pine Tree Legal, and the Commission) to review the structure and operation of the Commission, identify factors causing the perceptions of bias in favor of complainants, identify procedures and practices that may be unnecessarily burdensome or unfair, and issue a report with recommendations to the Governor.

The Review Panel unanimously agreed that the Commission, its commissioners and staff, are not biased or unfair toward respondents or complainants. Perceptions of bias were due, in part, to organizational and procedural inefficiencies and to misconceptions about the Commission's obligations and authority. The Commission is understaffed (5 to 6 investigators for approximately 700 complaints each year with no support staff) and has outdated technology, and the complaint process is inefficient. Common misconceptions are the Commission investigates all complaints because it believes discrimination occurred, when in fact, the Act mandates investigation of all complaints, and the Commission can order respondents to settle or pay damages when it has no statutory enforcement authority. The Commission must dismiss complaints if no reasonable grounds are found, and when reasonable grounds are found, it can only encourage settlement through mediation or conciliation, file a civil action on behalf of the complainant, or issue an order of findings (without enforcement, whether injunctive, punitive, or remunerative in nature).

Recommendations of the Review Panel included (1) engaging an organizational workflow consultant, (2) hiring more investigators and administrative support staff, (3) using intake specialists to ease the bottleneck at the intake stage by educating and assisting unrepresented parties through the process, (4) more training for commissioners and staff (particularly with respect to conducting neutral investigations), (5) upgrading computers and technology to allow for electronic filing and electronic signatures, (6) expanding the Commission's mediation program (more below), (7) modifying the Act and agreements with federal agencies to create a dual-track system to allow parties with legal representation to move through the process faster, (8) refining the process for requesting information and documentation at the complaint stage to avoid burdensome and irrelevant questions and requests, (9) community outreach program about the Commission's obligations and authority, (10) timely appointment of commissioners, and (11) funding for more staff, training, technology upgrades, and outreach.

The Commission did not receive any funding to implement the recommendations of the Review Panel. In FY 2018, the Commission still has the same number of investigators and they are responsible for both processing intakes and investigating 709 complaints. The Commission continues to be challenged by staff shortages and high turnover among investigators. There are no intake specialists or support staff for the investigators, and the Executive Director conducts most of the Commission's outreach activity in the State.

The Commission has made efforts to make the process more efficient. It developed a Third Party Neutral Mediation Program, an informal, voluntary process conducted by a neutral third party paid by the parties to help them resolve complaints. The program has grown (from 32 cases mediated in 2015 to 102 cases in 2018) because of its success, more than half of the cases resolved each year (68.75% in 2015 and 60.78% in 2018). The Commission is also proposing changes to its procedural rules this year to improve the efficiency of the complaint and investigation process.

- **Maine Human Rights Commission Complaint Process**

The Commission’s process for handling discrimination complaints under the Maine Human Rights Act is similar to HUD’s process for handling discrimination complaints under the Fair Housing Act. Because these processes are substantially equivalent, the Commission contracts with HUD and receives funding pursuant to the Fair Housing Assistance Program to investigate and process complaints under the Fair Housing Act for HUD.

The time period for submitting a complaint under the Maine Human Rights Act is 300 days, which is slightly shorter than the year under the Fair Housing Act. As part of the 2011 changes to the Maine Human Rights Act to become re-certified as substantially equivalent to the Fair Housing Act, the definition of “aggrieved person” was expanded to clarify that testers and groups representing protected classes could file complaints, not just those persons who were the subject of discrimination. Like HUD, the Commission favors resolving complaints by settlement agreement during the initial fact-finding or investigative stage before making a determination. If the complaint is not resolved, the investigator will submit an investigator’s report which includes a recommendation to the Commission as to whether there are reasonable grounds to believe that unlawful discrimination occurred. The Commission will hold a hearing to consider the recommendation and make a final decision. If the Commission does not find reasonable grounds to believe that unlawful discrimination has occurred, it shall enter an order so finding, and dismiss the complaint. If the Commission finds reasonable grounds to believe that unlawful discrimination has occurred, but finds no emergency, it will again attempt a conciliation agreement. If conciliation efforts are not successful, the Commission may file a civil action in State court seeking such relief as is appropriate, including temporary restraining orders, under the Maine Human Rights Act.

Pine Tree Legal Assistance, a nonprofit organization that provides civil legal assistance to low-income persons in Maine, also participates in and receives funding under the Fair Housing Assistance Program to operate a testing program in Maine.

- **Criminal Background Screening – Disparate Impact**

This year the Legislature considered legislation concerning the use of criminal background checks to deny housing. LD 1572, *An Act to Enact the Maine Fair Chance Housing Act*’ would:

- prohibit a landlord from inquiring about or considering a housing applicant’s criminal history until the landlord determines that the applicant has met all of the other qualifications for housing,
- require the landlord to keep all criminal history information about applicants confidential,
- permit an aggrieved person to file an action with the Commission for violations, except those by the State or any of its political subdivisions,

- for violations by private housing providers, (i) create a civil violation with a fine up to \$100 for first and second fines and investigation by the Commission for subsequent offences, (ii) permit a civil action for violation with legal or equitable relief to be determined by the court and reasonable attorney's fees and costs for an aggrieved person who prevails, and (iii) require mandatory counseling by the Commission.

The legislation was carried over to the next legislative session. The confidentiality provisions conflict with State law on criminal records with respect to certain crimes, most of them egregious in nature and not confidential to protect public safety. The Maine Real Estate Managers Association (MREMA) suggested that the legislation be used to incorporate HUD's *Office of General Counsel Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions* dated April 4, 2016 into State law. The guidance is federal law and the Commission does not have authority to enforce it. The Commission, MREMA, and other interested parties are working on a proposal to address these issues for the Legislature to consider next session.

- **Expanded VAWA (Violence Against Women Act) Protections**

2019 Public Law Chapter 455 expanded the documentation tenants can provide landlords to avail themselves with the State's VAWA protections to include police reports, criminal complaints, indictments, or convictions resulting from investigations or charges of sexual assault or stalking. The bill also expanded the harassment and protection from abuse laws to include harassment by telephone.

## Summary of Fair Housing Data Findings

### FAIR HOUSING COMPLAINTS

#### Basis

Disability is the most common basis for an allegation of a fair housing violation. In 2018, 48.3% of allegations were based on disability, with guide dog/support animals being the most frequently identified disability-related allegation. Disability allegations accounted for 185 housing discrimination cases considered by the Maine Human Rights Commission.

Table 1

Maine Human Rights Commission Housing Discrimination Cases						
Basis of Allegation	Year 2018		Years 2014 - 2018		City/Town	Allegations
	Count	Percent	Count	Percent		
Disability	185	48.3	1,007	53.1	Portland	281
Race/Color	38	9.9	211	11.1	South Portland	141
Familial Status	6	1.6	72	3.8	Bangor	124
Gender/Sex/Orientation	48	12.5	133	7.0	Lewiston	109
Retaliation	55	14.4	226	11.9	Auburn	92
National Origin/Ancestry	17	4.4	123	6.5	Augusta	65
Religion	6	1.6	41	2.2	Westbrook	47
Other & Source of Income	28	7.3	83	4.4	Kennebunk	44
Total	383		1,896		Old Orchard Beach	41
					Orono	41
					Total	985

Maine Human Rights Commission

**Disposition**

Table 2

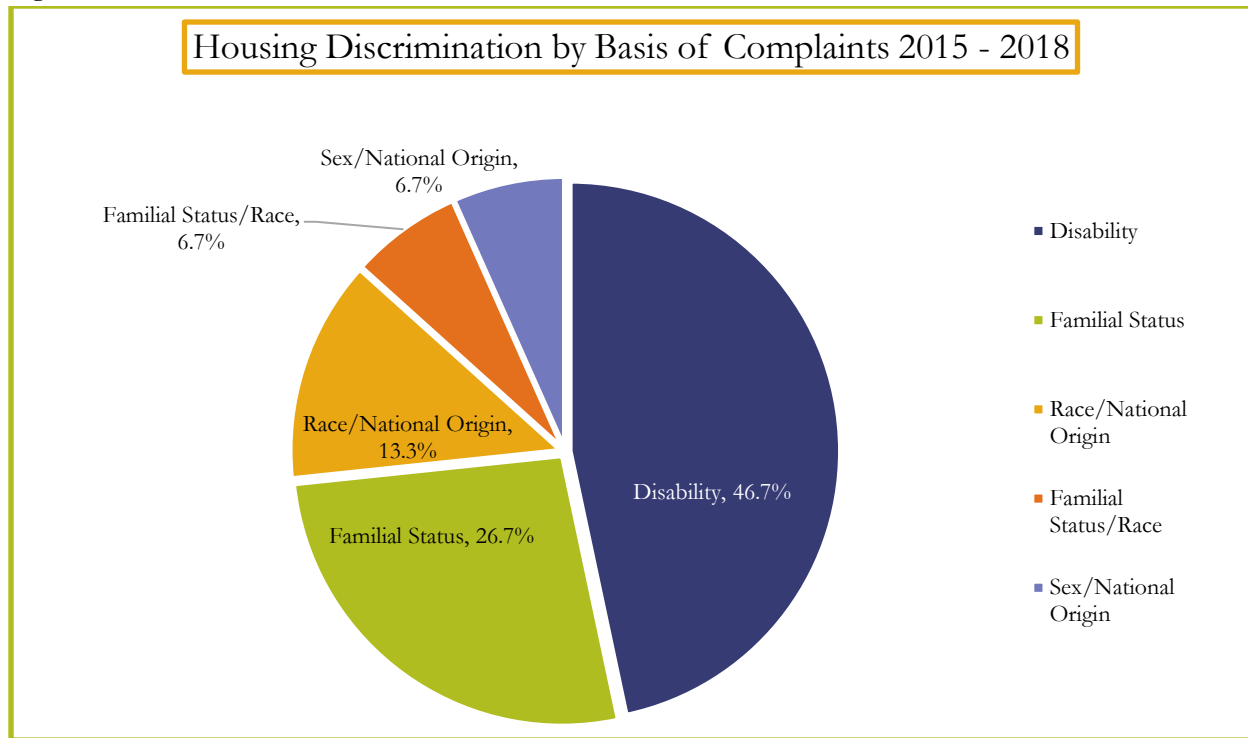
Disposition of MHRC Housing Discrimination Cases				
	2018		2014 - 2018	
	# of Cases	Percent	# of Cases	Percent
Administrative Closure	0	0.0	5	0.3
Case Settled By Legal Unit	0	0.0	86	4.5
Conciliation Failure	0	0.0	21	1.1
CP Failed To Cooperate	30	7.8	88	4.6
CP Withdrawal - No Ben.	27	7.0	93	4.9
No Cause Finding Issued	285	74.4	1,041	54.8
No Jurisdiction	21	5.5	94	4.9
Open Charge Closed By Legal Activity	0	0.0	26	1.4
Settlement With Benefits	8	2.1	233	12.3
Successful Conciliation	8	2.1	36	1.9
Withdrawal With Benefits	4	1.0	178	9.4
<b>Total</b>	<b>383</b>		<b>1,901</b>	

Maine Human Rights Commission

Most allegations reviewed by the Maine Human Rights Commission are disposed of with no cause for the allegation found. There were 233 cases settled with benefits from 2014 – 2018, of which only 8 were settled in 2018.

Some of the complaints brought to the Maine Human Rights Commission are the result of a fair housing testing program conducted in cooperation with Pine Tree Legal Assistance. Individuals are paid to test advertised rental properties randomly or for instances in which a landlord is suspected of discriminating. From 2015 – 2018, 514 tests were conducted; 94 provided evidence for 15 complaints filed with HUD and/or the Maine Human Rights Commission. The majority (46%) of the complaints were based on the disability of the occupant. Another 26.7% were based on the occupants’ familial status. Issues of race, national origin, or color comprised 13% of the complaints. Pine Tree Legal cases result from investigations the organization initiates based on its own assessment, as well as client complaints. The results are shown in Figure 1 below.

Figure 1



PineTree Legal Assistance of Maine

### Mortgage Activities

Minorities in Maine do not fare as well as whites in the pursuit of home ownership financing. Table 3 shows the distribution of loans originated and applications denied by financial institutions by race as a percent of all loans in Maine. Whites comprise 97.4% of all applications and obtain 97.8% of loan originations. Table 4 details the same data as a percentage of each race alone. With the exception of the Hawaiian/Pacific Islander population, whites have a much lower rate of denials and a higher rate of originations. Poor credit history is a prominent problem for minority applicants, followed by debt-to-income ratios as shown in Table 5.

Table 3

Actions	Race				
	White	African American	Asian	American Indian	Hawaiian/Pacific Islander
Applications	97.4%	0.7%	1.0%	0.7%	0.2%
Application Denied	96.2%	1.2%	1.1%	1.2%	0.2%
Loan Originated	97.8%	0.6%	0.9%	0.5%	0.2%

HMDA Data

Table 4

2017 Loan Denial and Origination Rates by Race					
	White	African American	Asian	American Indian	Hawaiian/Pacific Islander
Application Denied	16.2%	27.1%	17.7%	31.1%	14.9%
Loan Originated	59.9%	48.1%	53.6%	42.7%	56.4%

HMDA Data

Table 5

2017 Reasons for Denial by Race					
	White	Asian	African American or African American	Native Hawaiian or Other Pacific Islander	American Indian or Alaska Native
Lack of collateral	24.7%	16.7%	19.6%	14.3%	20.4%
Poor credit history	31.7%	22.90%	35.3%	57.1%	48.0%
Credit application incomplete	9.1%	10.4%	5.9%	14.3%	4.0%
Debt-to-income ratio too high	29.9%	37.5%	29.4%	0.0%	24.0%
Poor employment history	1.9%	8.3%	3.9%	14.3%	2.0%
Insufficient cash (down payment, closing costs)	2.6%	4.2%	5.9%	0.0%	0.0%
Mortgage insurance denied	0.2%	0.0%	0.0%	0.0%	0.0%

HMDA Data

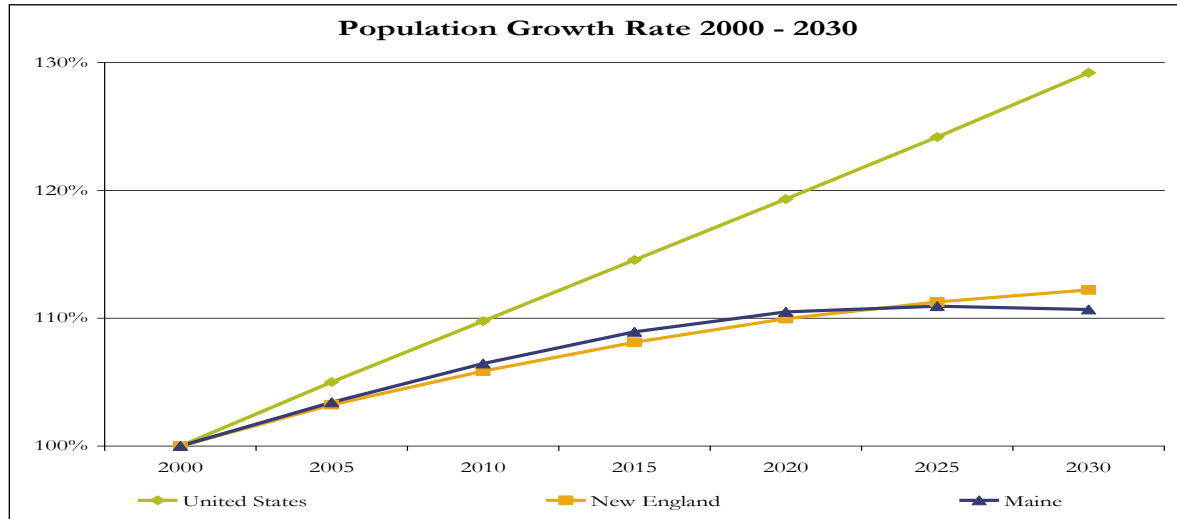
## DEMOGRAPHICS, INCOME, AND THE RESIDENTIAL HOUSING MARKET

### Population Trends

Maine’s population is experiencing flat growth, “super” aging, and is shifting to the southeastern coastal areas of the state. The population of Maine has increased an estimated 38% since 1960. Since 2000 however, its growth has been relatively flat and is projected to remain so through 2030. The state ranked 40<sup>th</sup> in total population among the states in 2010, and dropped to 43<sup>rd</sup> in 2018. Maine is the largest state, geographically, in the New England region.

Maine’s population is projected to grow a flat rate of less than a 1% through 2030. The greatest growth will be among those 65 and older, with a projected 37% gain from 2016 – 2026. Seven of Maine’s 16 counties are projected to see population increases from 2016-2021, while eight are projected to increase from 2021-2026. Seven counties are projected to see cumulative increases over the ten-year period from 2016-2026.

Figure 2: Population Growth Rates and Projection, Census



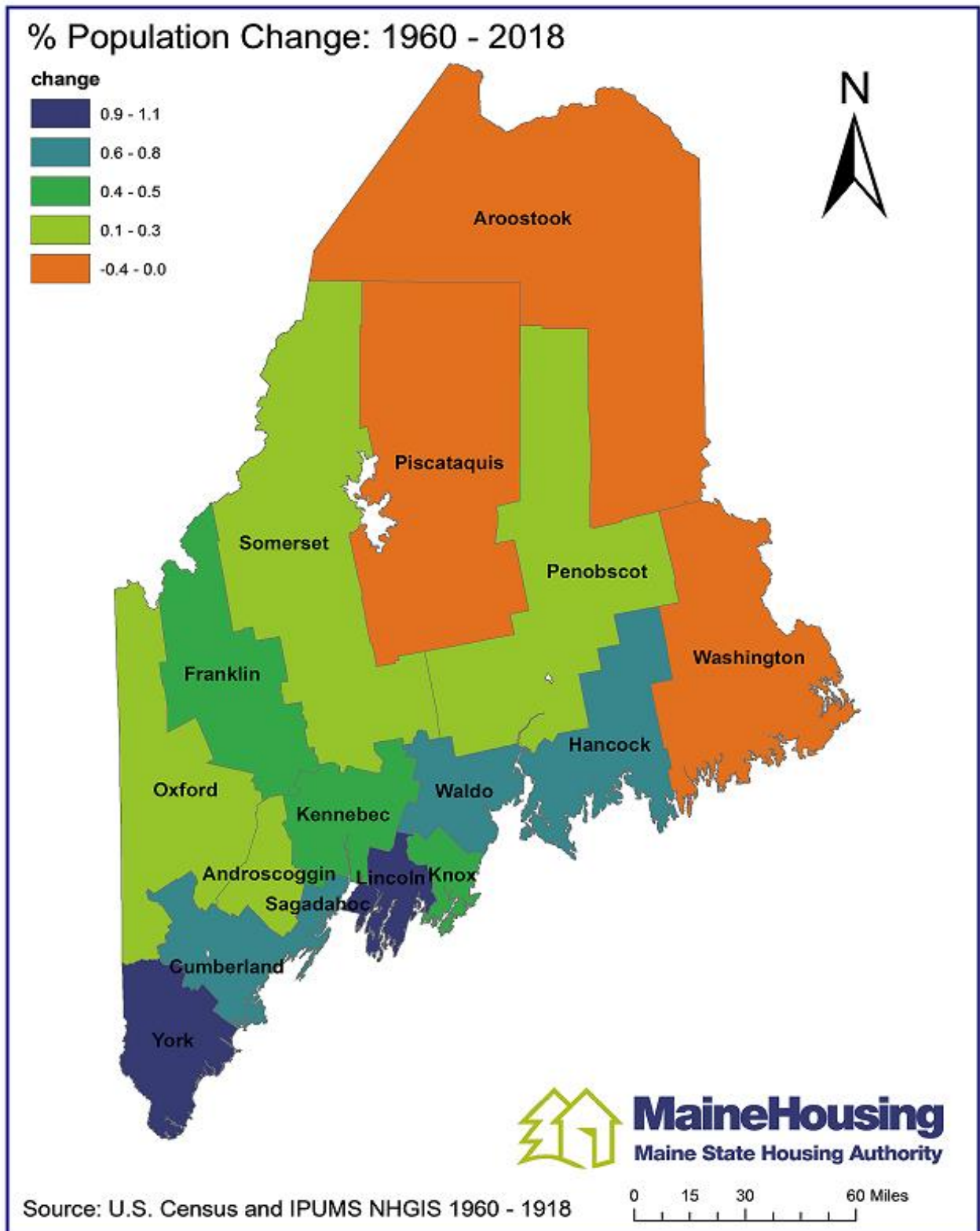
The most significant demographic change in Maine is its aging population. Maine is now considered the oldest state in the nation with a median age of 44. The older adult community is projected to comprise nearly a quarter of the total population by the middle of the next decade.

For over 50 years, Maine has seen its most significant population growth in the coastal and southern portions of the state. Of Maine’s sixteen counties, York county saw a 107% increase in population since 1960, followed by Lincoln and Waldo counties. Aroostook county saw a decrease of 36% over the same period (see table 6).

Table 6: National Historical Geographic Information System, University of Minnesota

County	1960	1970	1980	1990	2000	2010	2018	% Change 1960 - 2018
Maine	969,265	992,048	1,124,660	1,227,928	1,274,923	1,328,361	1,338,404	38.1
Androscoggin	86,312	91,279	99,657	105,259	103,793	107,702	107,679	24.8
Aroostook	106,064	92,463	91,331	86,936	73,938	71,870	67,111	-36.7
Cumberland	182,751	192,528	215,789	243,135	265,612	281,674	293,557	60.6
Franklin	20,069	22,444	27,098	29,008	29,467	30,768	29,897	49.0
Hancock	32,293	34,590	41,781	46,948	51,791	54,418	54,811	69.7
Kennebec	89,150	95,247	109,889	115,904	117,114	122,151	122,083	36.9
Knox	28,575	29,013	32,941	36,310	39,618	39,736	39,771	39.2
Lincoln	18,497	20,537	25,691	30,357	33,616	34,457	34,342	85.7
Oxford	44,345	43,457	48,968	52,602	54,755	57,833	57,618	29.9
Penobscot	126,346	125,393	137,015	146,601	144,919	153,923	151,096	19.6
Piscataquis	17,379	16,285	17,634	18,653	17,235	17,535	16,800	-3.3
Sagadahoc	22,793	23,452	28,795	33,535	35,214	35,293	35,634	56.3
Somerset	39,749	40,597	45,028	49,767	50,888	52,228	50,592	27.3
Waldo	22,632	23,328	28,414	33,018	36,280	38,786	39,694	75.4
Washington	32,908	29,859	34,963	35,308	33,941	32,856	31,490	-4.3
York	99,402	111,576	139,666	164,587	186,742	197,131	206,229	107.5

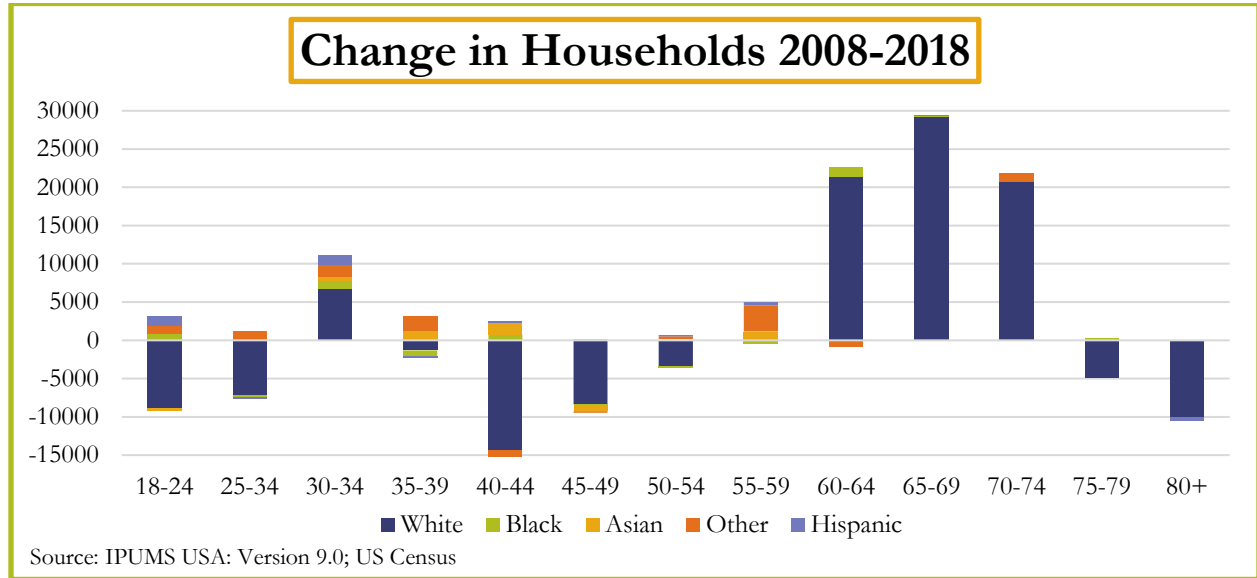
Map 1: Percentage Change for Maine Counties, 1960 – 2010



## Age

Maine’s median age is 44.3 years, the oldest median age of any state in the nation, and a sharp contrast with the nationwide median of 37.8 years. The Census Bureau predicts that by 2026, Maine will be a “super aged” state, with 24% of the state’s population over 65 years. The older population in Maine is less diverse than the population 18 – 59 years old, reflecting the relative surge in the minority population beginning in the 1990s.

Figure 3: Household Change by Race and Age



<b>Working-age to senior ratio <sup>*</sup></b>		
	<b>2015</b>	<b>2030</b>
United States	4.2	2.8
Androscoggin	4.1	2.8
Penobscot	4.0	2.6
Cumberland	3.9	2.4
Kennebec	3.6	2.3
York	3.5	2.0
<b>Maine</b>	<b>3.4</b>	<b>2.2</b>
Oxford	3.3	2.0
Somerset	3.3	2.0
Franklin	3.2	2.0
Sagadahoc	3.1	1.8
Waldo	3.1	1.9
Aroostook	2.9	1.9
Hancock	2.8	1.7
Knox	2.7	1.8
Washington	2.6	1.8
Piscataquis	2.4	1.5
Lincoln	2.2	1.3

*\*Age 16 to 64 divided by 65 and over.*  
*Sources: U.S. Census Bureau; Governor's Office of Policy and Management.*

As population growth slows and continues to age, the ratio of working-age Maine residents to older, nonworking-age residents will also change.

The retirement aged population is projected to grow faster than those of working age. Maine’s population of 0 – 19, 20 – 39 and 46 – 64 years old is projected to grow at rates of -12%, 2%, and -12% respectively. The population over 65 years will grow 37%.

Today, for every person over the age of 65 in Maine, there are an estimated 3.4 working-age persons. By 2030, that ratio is expected to diminish to one senior to 2.8 workers. Maine will have to entice larger numbers of working age people to stem the current demographic tide.

**Race**

Maine is not, comparatively speaking, a racially diverse state. With the exception of unidentified races and native Hawaiians, other minorities in Maine increased measurably from 1990 to 2017, and these minorities now comprise 5.4 % of the state’s total population. Likewise, Maine’s white population had declined to 94.6%. Like its northern New England sister states of Vermont and New Hampshire, Maine’s black population (1.3%) and Asians (1.1%) are much fewer in numbers than the national distribution of 13% and 5% respectively.

Table 8

<b>Maine Population By Race</b>						
<b>Race</b>	<b>1990</b>	<b>2000</b>	<b>2010</b>	<b>2017</b>	<b>Percentage Change 1990 to 2017</b>	<b>Percentage Change 2000 to 2017</b>
<b>White</b>	1,206,956	1,236,014	1,264,971	1,258,918	4	2
<b>Black or African American</b>	4,959	6,760	15,707	16,906	241	150
<b>Asian</b>	6,588	9,111	13,571	14,807	125	63
<b>American Indian or Alaska Native</b>	5,901	7,098	8,568	8,212	39	16
<b>Native Hawaiian or Pacific Islander</b>	N/A	382	342	249	-35	-35
<b>Some other race alone</b>	6,287	2,911	4,261	2,967	-53	2
<b>Two or More Races</b>	N/A	12,647	20,941	28,102	122	122
<b>Total State Population</b>	1,230,691	1,274,923	1,328,361	1,330,158	8.1	4
<b>Total Minorities*</b>	23,735	38,909	63,390	71,240	63.9	83
<b>Percentage Minority</b>	1.9	3.1	4.8	5.4		

Sources: U.S. Census Bureau Summary Files DP-1 for the 1990, 2000 & 2010 Decennial Censuses; ACS 5-Year 2012 - 2017, Table B02001  
 \* Obtained subtracting white from total state population.

Maine has no Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) using HUD's definition of R/ECAP, with the exception of the Penobscot Indian Island Reservation. Though the population of black and Asian people have doubled since 1990, there are no areas where this population is concentrated. The cities of Portland and Lewiston have the largest population of minorities in Maine.

### **Race/Ethnicity and Income**

Households headed by minorities in Maine earn far less than white households with the exception being Asian households. Household income is one of several factors used to determine eligibility for housing assistance. In Maine, the median household income for Whites and Asians was higher than the state median while all other minorities were well below that median.

Minority households have both lower incomes and higher rates of poverty. The U.S. Census Bureau determines the poverty status of households by using a set of dollar value thresholds that vary by family size and composition. As shown in Table 4, blacks have the lowest median income and the highest rate of poverty.

**Table 9 Median Incomes and Poverty by Race and Ethnicity**

	<b>Median Household Income</b>	<b>Poverty Rate (%)</b>
Maine	\$53,024	12.9
Whites	\$53,585	12.1
Blacks	\$28,018	42.5
American Indian/Alaska Native	\$32,372	33.3
Asians	\$53,151	13.3
Hispanics	\$45,211	19.9

Source: U.S. Census Bureau 2017 ACS 5 Year 2013-2017, Tables S1903 & S1701

Incomes have not improved evenly across all races. Using the income grouping shown below in Table 10, the percentage of all households in Maine is greatest at the \$75,000 and over range. White and Asian households have similar distributions, but Asian households have the greatest percentage of households at the \$75,000 range. In contrast, nearly half of black and Indian households remain distributed in the lowest income range, a range far lower than the state median income and more in line with median renter incomes. Hispanic households have the most even distribution across income ranges. An estimated 22.9% of Maine households fall into the extremely low to low income range, an improvement from 2010 when 26% fell in that range.

**Table 10 Household Income by Race 2017**

	Total	\$0 - \$24,999		\$25 - \$49,999		\$50 - \$74,999		\$75,000 +	
		#	%	#	%	#	%	#	%
All Households	554,061	126,812	22.9	134,767	24.3	106,376	19.2	186,106	33.6
White	533,516	119,659	22.4	129,512	24.3	103,256	19.4	181,089	33.9
Black	4,530	2,151	47.5	1,064	23.5	601	13.3	714	15.8
Indian	3,255	1,362	41.8	777	23.9	540	16.6	576	17.7
Asian	4,227	897	21.2	1,083	25.6	559	13.2	1,688	39.9
Hispanic	5,928	1,628	27.5	1,660	28.0	1,070	18.0	1,570	26.5

Source: U.S Census ACS 5 Year 2013 -2017 Tables B19001, 1A, 1B, 1C, 1D, 1E & 1I

Income varies regionally. The median household income for Cumberland, Sagadahoc and York counties, all in the southern region of the state, was over \$60,000, and the poverty rate there was well below the state rate of 12.9%. In contrast, Aroostook, Kennebec, Oxford, Penobscot, Piscataquis, Somerset, Waldo and Washington all have poverty rates above the state rate. Aroostook, Piscataquis and Washington counties have both low median incomes and very high poverty rates. Generally, counties that have seen population increases have lower levels of poverty.

Table 11 Median Income and Poverty Rates, 2010 County

	Median Household Income	Poverty Rate (%)
Maine	\$53,024	12.9
Androscoggin	\$49,538	14.3
Aroostook	\$39,021	17.5
Cumberland	\$65,702	10.7
Franklin	\$45,541	12.4
Hancock	\$51,438	11.6
Kennebec	\$50,116	14.1
Knox	\$53,117	11.6
Lincoln	\$54,041	11.8
Oxford	\$44,582	15.2
Penobscot	\$47,886	15.9
Piscataquis	\$38,797	18.7
Sagadahoc	\$60,457	11.3
Somerset	\$41,549	17.8
Waldo	\$50,162	14.3
Washington	\$40,328	18.2
York	\$62,618	8.5

Source: U.S. Census Bureau, 2013-2017 ACS Tables S1701 & S1903 )

Table 12 Household Income by Race 2017

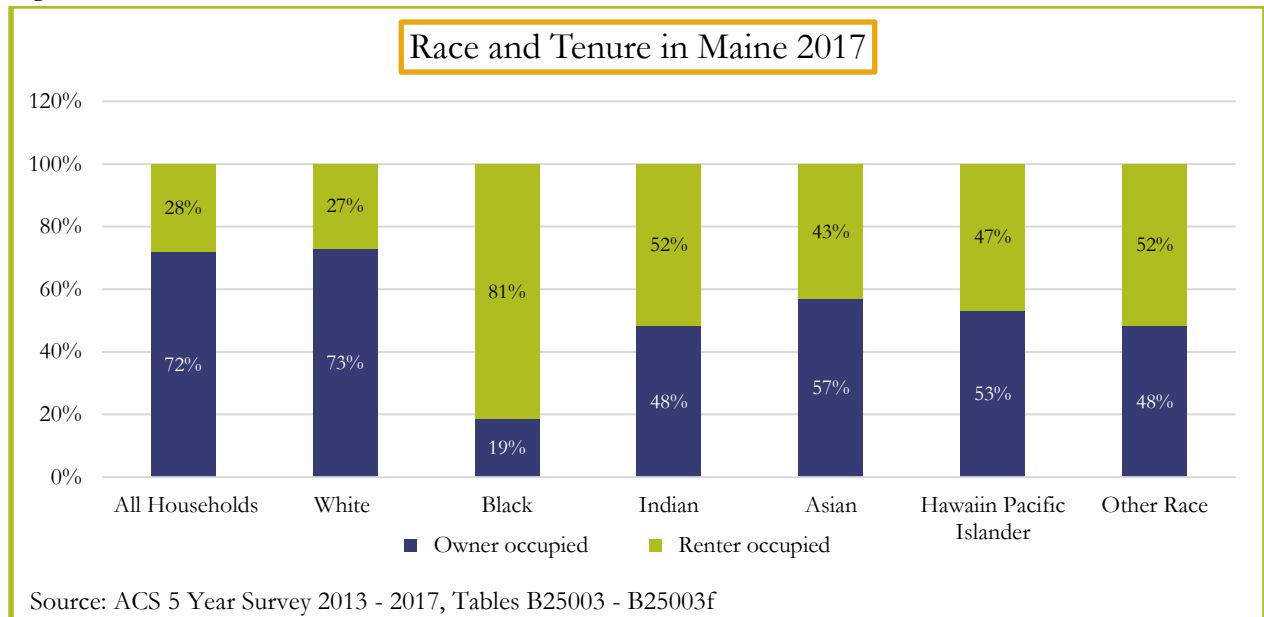
	Total	\$0 - \$24,999		\$25 - \$49,999		\$50 - \$74,999		\$75,000 +	
		#	%	#	%	#	%	#	%
All Households	554,061	126,812	22.9	134,767	24.3	106,376	19.2	186,106	33.6
White	533,516	119,659	22.4	129,512	24.3	103,256	19.4	181,089	33.9
Black	4,530	2,151	47.5	1,064	23.5	601	13.3	714	15.8
Indian	3,255	1,362	41.8	777	23.9	540	16.6	576	17.7
Asian	4,227	897	21.2	1,083	25.6	559	13.2	1,688	39.9
Hispanic	5,928	1,628	27.5	1,660	28.0	1,070	18.0	1,570	26.5

Source: U.S Census ACS 5 Year 2013 -2017 Tables B19001, 1A, 1B, 1C, 1D, 1E & 1I

## **Race and Tenure**

Maine’s white population has the highest homeownership rate at 73%, higher than the state rate of 72% and the national rate of 64%. Homeownership is often seen as a measure of wealth and the capacity to build wealth, and generally as more conducive to building strong families and raising successful children. Among minorities in Maine, homeownership rates range from a low of 19% for black households to 57% for Asian households.

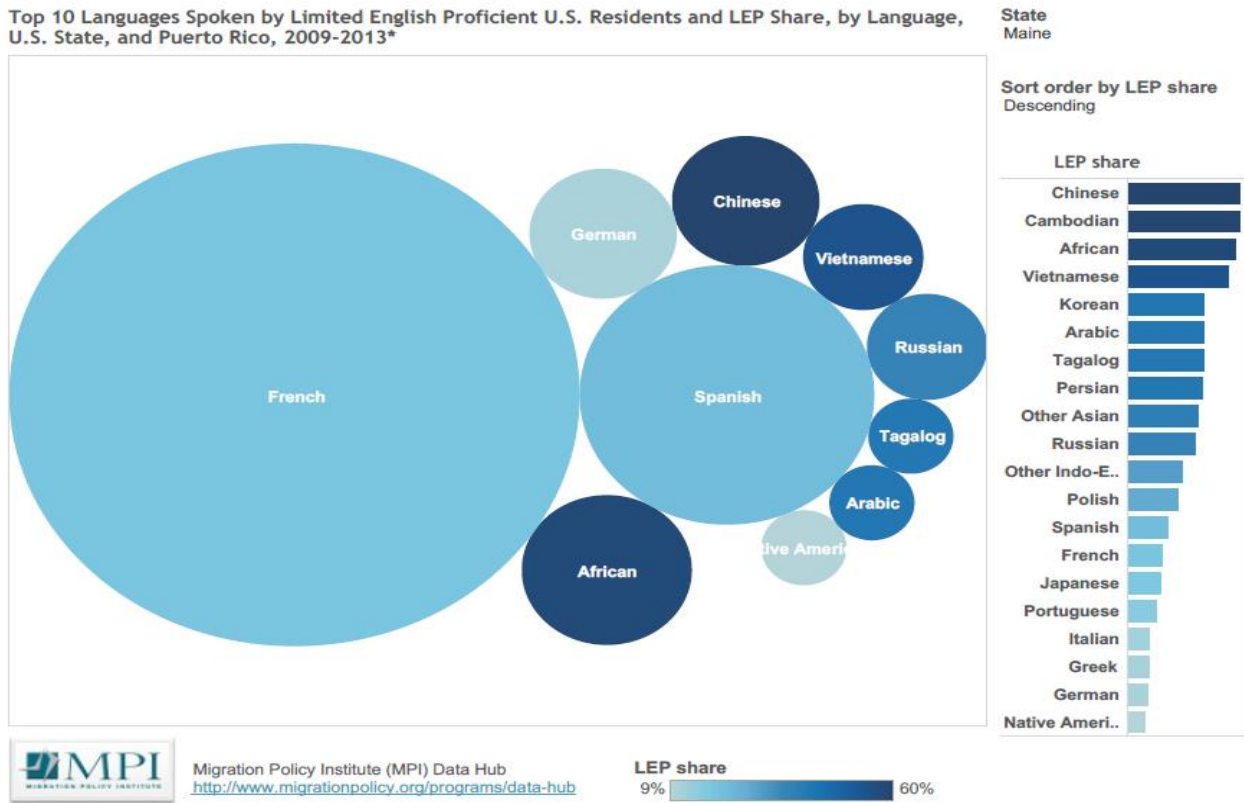
Figure 4 Race and Tenure



## Language

An estimated 2% of Maine residents have Limited English Proficiency (LEP). Maine residents with LEP have difficulty reading, writing, and speaking English, as well as understanding others who speak it. LEP can impact an individual's chances to access safe affordable housing.

Figure 5 LEP



## Disabilities

The State of Maine has a disabled population of 16%, or 208,646 individuals. Two thirds of Maine's disabled residents are over 65. More Maine residents with a disability have an ambulatory disability than any other type, followed by those with cognitive disabilities. Working aged adults, ages 18 – 64, have the largest share in both the cognitive and ambulatory categories.

## Median Household Income

More rural, less populated counties have lower median incomes. Married-couple family households have higher median incomes than family or nonfamily households regardless of the region. The dollar amount of each family type varies by county. Married-couple family income averages 145% higher than median income across the counties, with family households earning an average 126% of median household incomes. Non-family households earn about half the median.

Table 13 below provides the median dollar amounts for household type by county. Maine's median household size is 2.34 (See figure 6).

**Table 13 Median Incomes by Household Type**

	Median Income			
	Households	Families	Married-couple families	Nonfamily households
<b>Maine</b>	<b>\$53,024</b>	<b>\$67,340</b>	<b>\$77,431</b>	<b>\$30,185</b>
Androscoggin	\$49,538	\$63,360	\$74,269	\$30,200
Aroostook	\$39,021	\$52,023	\$59,670	\$19,792
Cumberland	\$65,702	\$85,525	\$97,332	\$39,209
Franklin	\$45,541	\$57,183	\$64,882	\$25,997
Hancock	\$51,438	\$66,242	\$74,868	\$28,395
Kennebec	\$50,116	\$65,348	\$75,007	\$28,831
Knox	\$53,117	\$64,176	\$71,137	\$32,282
Lincoln	\$54,041	\$69,352	\$79,692	\$28,439
Oxford	\$44,582	\$54,970	\$63,310	\$25,628
Penobscot	\$47,886	\$61,325	\$71,298	\$25,568
Piscataquis	\$38,797	\$49,721	\$56,752	\$22,102
Sagadahoc	\$60,457	\$73,913	\$84,252	\$35,114
Somerset	\$41,549	\$54,148	\$63,989	\$20,603
Waldo	\$50,162	\$61,640	\$70,427	\$27,314
Washington	\$40,328	\$50,663	\$59,227	\$22,056
York	\$62,618	\$74,865	\$85,016	\$36,396

US Census, 2017 ACS 5 Year, Table S1901

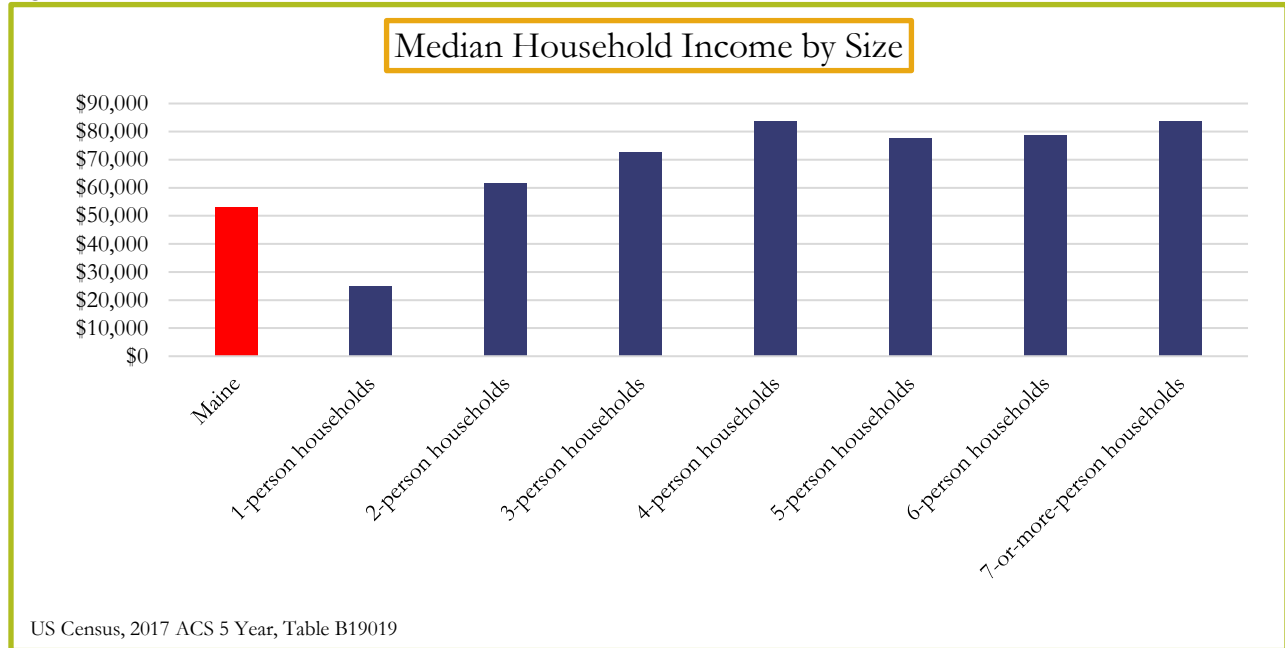
Maine has a significant number of occupied nonfamily households (the 5<sup>th</sup> highest in the nation), with 78% of them occupied by one individual earning very low median incomes.

**Table 14 Occupied Households by Type and Size**

	Family households	Nonfamily households
Total Households	348,315	205,746
1-person	0.0%	78.3%
2-person	52.0%	18.6%
3-person	21.7%	2.1%
4-person	17.2%	0.7%
5-person	6.0%	0.2%
6-person	2.2%	0.0%
7-or-more	0.9%	0.1%

US Census, 2017 ACS 5 Year, Table B11016

Figure 6



### Purchasing

Government programs that provide low income households with low interest, down payment, and closing cost assistance are still needed. Although home sales in Maine have not reached prerecession levels, they are increasing. Conventional home purchase loans have reached their highest level since the prerecession period. Among loans requiring low to no down payments, Veterans Administration loans have increased threefold since 2008, while others have remained comparatively level over the same period. This trend reflects a continuing capacity of potential buyers to save enough to enter the market without some assistance. Overall however, the ratio of low or no downpayment loans to conventional loans has diminished 4 percentage points since 2008 after exceeding conventional loan total from 2008 through 2019.

Table 15

Loan Applications by Loan Type								
State of Maine								
HMDA Data								
Loan Type	2008	2009	2010	2011	2012	2013	2014	2017
Conventional	11,329	8,924	7,825	7,452	8,839	10,296	10,993	40,297
FHA-insured	3,416	5,021	5,066	3,933	3,940	3,156	3,009	8,812
FSA/RHS-guaranteed	1,019	3,055	2,420	2,647	3,336	4,199	4,025	3,359
VA-guaranteed	769	1,046	1,270	1,258	1,361	1,590	1,874	2,589
<b>Total</b>	<b>16,533</b>	<b>18,046</b>	<b>16,581</b>	<b>15,290</b>	<b>17,476</b>	<b>19,241</b>	<b>19,901</b>	<b>55,057</b>

HMDA Data

## Identification of Impediments to Fair Housing Issues

Based on our research, we identified the following potential impediments or barriers to fair housing choice. Actions or steps to remediate these impediments are outlined in the following action plan.

### 1. Lack of Affordable Housing

- The number of affordable housing units is inadequate to meet the need of low income households.
- An estimated 17,000 applicants remain on voucher waiting lists in Maine at the local and state housing authorities combined. The average time on such lists is in excess of one year.
- Down payment and closing cost assistance is needed for home buyers.
- The failure to preserve the existing supply of affordable housing units and aging public housing developments will diminish supply. During the mid-1960s and 70s, over 4,000 units of public housing were built and are now aging. An estimated 4,658 units of LIHTC housing, or 55% of all LIHTC units, were built prior to 2001. They are now eligible for another LIHTC allocation in order to preserve their affordability and to maintain or improve their physical quality.
- A decline in resources has led to reduced production of new affordable housing and rental housing assistance.

### 2. Racial, Ethnic and Cultural Barriers

- Maine's minority populations have lower incomes than the majority white population.
- Minorities in Maine do not move into the mid to upper income brackets (\$50,000 or more) at a rate proportional to that of the white population.
- Though the rate of population growth among Maine's minority population has slowed from the rate seen between 2000 and 2010, it has still maintained a growth rate faster than the white population since 2010.

### 3. Community Planning and Zoning decisions that impede affordable housing

- Local zoning ordinances can limit the size of lots and the number of occupants in a given area.
- Limits on the number of persons in a given area can limit development of group homes designed to house people with special needs due to disabilities.
- Understanding of building codes and Fair Housing laws/requirements vary by municipality.
- Density restrictions make the addition of accessory dwelling units more difficult.

**4. Lack of availability and access to housing for disabled individuals**

- The proportion of Maine’s disabled population is higher than the national rate and that of all the other New England states.
- The majority of housing complaints filed with the Maine Human Rights Commission are based on allegations of disability.

**5. Limited access to neighborhood opportunities and community assets**

- Residents in rural areas face increased costs associated with obtaining services and products, and getting to work. Due to Maine’s geography, availability of public transportation is limited.
- Limited access to neighborhood opportunities and community assets particularly impact low income minority households located in rural Maine
- LIHTC projects are not feasible in areas facing diminished transportation options, essential services, or jobs.
- There is reluctance on the part of Section 8 program applicants to take subsidized units far from employment and services due to transportation-related costs.

**6. Lack of understanding of fair housing and affirmatively furthering fair housing**

- Differing federal and state accessibility requirements are complex, causing confusion among developers and design professionals, and often leading to noncompliance.
- Due to a lack of understanding, fair housing laws are not always followed. The majority of housing discrimination complaints are based on disabilities.
- Public education efforts are inadequate and may not reach all intended audiences.

# MaineHousing

## Analysis of Impediments to Fair Housing

### Action Plan

MaineHousing submits the following action plan to address impediments identified in its Analysis of Impediments to Fair Housing.

<b>Impediment 1: Lack of Affordable Housing</b>			
<b>Action</b>	<b>Measurable Objective</b>	<b>Timeline</b>	<b>Responsible Department</b>
<b>1.1 Increase the number of affordable housing units and preserve existing units</b>	Number of affordable housing units created and preserved	Annually	DEV/AM
<i>Results:</i>			
<b>1.2 Increase the resources available to develop affordable housing</b>	Changes (increase/decrease) in funding available for programs	Annually	Directors
<i>Results:</i>			
<b>1.3 Conduct data collection and analysis of affordable housing availability and needs in Maine</b>	Publication of housing facts	Annually	CPD
Work with communities to conduct local community housing assessments upon request	Number of community housing assessment requests received and completed		
Publish housing facts and organize data to assist external partners conducting affordable housing related research			
<i>Results:</i>			

<p><b>1.4 Achieve deeper affordability than the statutory minimum affordability required for LIHTC and tax-exempt bond projects</b></p>	<p>Number of affordable units that exceed the minimum required</p> <p>Number of units with income targeting below minimum required</p> <p>Number of units that are affordable longer than minimum affordability period</p>	<p>Annually</p>	<p>DEV</p>
<p><b>Results:</b></p>			
<p><b>1.5 Increase homebuyer affordability</b></p> <p>Maintain or increase the difference between MaineHousing's lower interest rate relative to the average bank rate for low and moderate income homebuyers</p> <p>Provide down payment assistance to qualified homebuyers</p>	<p>Change in yearly differential in MaineHousing interest rate compared to market rate</p> <p>Number of buyers receiving down payment assistance</p>	<p>Annually</p>	<p>HO</p>
<p><b>Results:</b></p>			
<p><b>1.6 Preserve existing affordable single family homes</b></p> <p>Provide grants and/or no interest loans to low-income households to make repairs and improvements</p>	<p>Number of low-income households assisted</p>	<p>Annually</p>	<p>EHS</p>
<p><b>Results:</b></p>			

<p><b>Impediment 2. Racial, Ethnic and Cultural Barriers</b></p>			
<p><b>Action</b></p>	<p><b>Measurable Objective</b></p>	<p><b>Timeline</b></p>	<p><b>Responsible Department</b></p>
<p><b>2.1 Examine MaineHousing programs for opportunities to broaden participation</b></p>	<p>Summary report shared with MaineHousing program directors.</p> <p>Number of program modifications recommended.</p>	<p>Annually</p>	<p>CPD/ Innovation Team</p>
<p><b>Results:</b></p>			

<b>Impediment 2. Racial, Ethnic and Cultural Barriers</b>			
<b>Action</b>	<b>Measurable Objective</b>	<b>Timeline</b>	<b>Responsible Department</b>
<b>2.2 Coordinate and fund Fair Housing Workshops for racial, ethnic and cultural communities</b>	Number of participants	Annually	HO
<i>Results:</i>			
<b>2.3 Fund English as a Second Language financial literacy group education and one-on-one counseling for individuals who are not proficient in the English language</b>	Number of individuals counseled	Annually	HO
<i>Results:</i>			
<b>2.4 Fund training of housing counselors that offer English as a Second Language financial literacy group education.</b>	Number of training sessions offered or sponsored.	Annually	HO
<i>Results:</i>			

<b>Impediment 3. Community Planning and Zoning Decisions that Impede Affordable Housing</b>			
<b>Action</b>	<b>Measurable Objective</b>	<b>Timeline</b>	<b>Responsible Department</b>
<b>3.1 Educate the public and local officials on the multiple benefits housing can bring to each and every community</b>	Number of meetings  Number of requests made and number of presentations delivered  Materials Developed	On going	CPD
<i>Results:</i>			
<b>3.2 Support affordable housing projects against NIMBY efforts (discrimination by communities or neighbors) as necessary</b>	Number of projects experiencing NIMBYism supported by MaineHousing	Ongoing	LEGAL/CPD
<i>Results:</i>			

<b>Impediment 4. Lack of Availability and Access to housing for disabled individuals</b>			
<b>Action</b>	<b>Measurable Objective</b>	<b>Timeline</b>	<b>Responsible Department</b>
4.1 Create more accessible units than required by state and federal law through scoring incentives in the multifamily development programs	Number of additional accessible units created	Annually	DEV
<i>Results:</i>			
4.2 Expand accessibility in existing housing through targeted programs and funding	Number of accessible units created	Annual	EHS / CPD / AM
<i>Results:</i>			
4.3 Inform developers and landlords about accessibility requirements	Number of developers and landlords reached with information	Ongoing	AM/DEV/ HCV/EHS
<i>Results:</i>			
4.4 Continue to encourage the use of MainehousingSearch.org to identify accessible units	Number flagged for accessibility  Hits on <a href="http://mainehousingsearch.org">mainehousingsearch.org</a>	Ongoing	HCV/HI/ CPD
<i>Results:</i>			
4.5 Collaborate with other state agencies to help individuals with special needs move to independent living	Number of homeward bound vouchers  The number of individuals assisted with HTF and 811	Ongoing	HCV/DEV/ AM
<i>Results:</i>			

<b>Impediment 5. Limited access to neighborhood opportunities and community assets</b>			
<b>Action</b>	<b>Measurable Objective</b>	<b>Timeline</b>	<b>Responsible Department</b>
5.1 Utilize selection criteria in the LIHTC Qualified Allocation Plan to incent the development of affordable housing in high-opportunity areas	Number of projects awarded LIHTC that are located in high-opportunity areas	Annually	DEV
<i>Results:</i>			

<b>Impediment 5. Limited access to neighborhood opportunities and community assets</b>			
<b>Action</b>	<b>Measurable Objective</b>	<b>Timeline</b>	<b>Responsible Department</b>
<b>5.2 Qualified Allocation Plan</b> Incent development of new housing in areas with access to community assets (location in service center communities with higher need and location near public transportation, schools, employment, services and other amenities important to daily living )	Number of projects awarded LIHTC that are awarded points for smart growth concepts.	Annually	DEV
<b>Results:</b>			
<b>5.3 Qualified Allocation Plan</b> Incent development of affordable housing in areas where the differential between the maximum LIHTC rent and the market rent is higher	Number of LIHTC units awarded in areas where the market rent exceeds the LIHTC rent.	Annually	DEV
<b>Results:</b>			
<b>5.4 Qualified Allocation Plan</b> Encourage economic diversity by incenting the development of mixed-income housing in qualified census tracts	Number LIHTC of units awarded in mixed-income projects in QCTs	Annually	DEV
<b>Results:</b>			
<b>5.5 Increase the use of HCV vouchers in low poverty areas</b>	Number of new tenants leasing up in low poverty areas	Annually	HCV
<b>Results:</b>			

<b>Impediment 6. Lack of Understanding of Fair Housing and Affirmatively Furthering Fair Housing</b>			
<b>Action</b>	<b>Measurable Objective</b>	<b>Timeline</b>	<b>Responsible Department</b>
<b>6.1 Partner with associations focused on human rights as it pertains to fair housing</b>	Number of joint initiatives	Ongoing	HO and Program Directors
<i>Results:</i>			
<b>6.2 Coordinate fair housing complaint resolution with partners and clients and refer fair housing complaints to appropriate agencies if necessary.</b>	Number of fair housing interventions and/or referrals	Ongoing	Legal
<i>Results:</i>			
<b>6.3 Continue fair housing public education programs designed to assist landlords, builders, and relevant professionals</b>	Number of relevant professionals receiving training	Ongoing	DEV/HCV/HO/AM/HI
<i>Results:</i>			
<b>6.4 Maintain MaineHousing's Fair Housing website page which includes information and resources about fair housing and equal access laws.</b>	Number of website hits on the Fair Housing page.	Ongoing	CPD
<i>Results:</i>			

<b>6.5 Provide MaineHousing's comprehensive Communications Resource Guide to employees, contractors, agents, and owners/property managers of multi-family projects</b>	Number of guides distributed/website hits	Ongoing	LEGAL/AM/CPD
<i>Results:</i>			
<b>6.6 Provide an internal grievance procedure for applicants and participants to file fair housing complaints about programs and services</b>	Number of internal grievances resolved	Ongoing	LEGAL
<i>Results:</i>			

<p><b>6.7 Education and Outreach</b> Distribute materials on affordable housing and fair housing at conferences, workshops, and other appropriate public venues</p>	<p>Number of people educated at Fair Housing Workshops and Trainings Number of events at which these materials are distributed  Number of brochures and other materials distributed  Number in attendance at the biannual conference</p>	<p>Ongoing</p>	<p>HO/ CPD</p>
<p><i>Results:</i></p>			
<p><b>6.8 Coordinate and fund tenant education and financial literacy training for Navigators who in turn deliver financial literacy training for individuals transitioning from homeless shelters to permanent housing</b></p>	<p>Number of navigators trained  Number of clients trained</p>	<p>Annually</p>	<p>HI</p>
<p><i>Results:</i></p>			
<p><b>6.9 Provide eHomeAmerica as an on-line option for home buyer education</b></p>	<p>Number of participants who utilize eHomeAmerica on-line.</p>	<p>Ongoing</p>	<p>HO</p>
<p><i>Results:</i></p>			
<p><b>6.10 Continue to sponsor homeownership education classes that contain information about Fair Housing laws that are relevant to prospective home buyers.</b></p>	<p>Number of participants in home buyer education classes.</p>	<p>Ongoing</p>	<p>HO</p>
<p><i>Results:</i></p>			