

PUBLIC NOTICE AFFIRMATIVE FAIR HOUSING POLICY

This notice is published pursuant to the requirements of Executive Order 11063 on equal opportunity in housing and nondiscrimination in the sale or rental of housing built with federal assistance, and with Title VIII of the Civil Rights Act of 1968, as amended, which prohibits discrimination in the provision of housing because of race, color, creed, religion, sex, national origin, disability, or familial status.

The City of Marion advises the public that it will administer its assisted programs and activities relating to housing and community development in a manner to affirmatively further fair housing in the sale or rental of housing, the financing of housing and the provision of brokerage services.

The City of Marion shall assist individuals who believe they have been subject to discrimination in housing through the resources of the Iowa Civil Rights Commission or the U.S. Department of Housing and Urban Development.

The City of Marion has designated the following (person or office) as the contact to coordinate efforts to comply with this policy. Inquiries should be directed to:

NAME: Alicia Abernathy

OFFICE: City Manager's Office/Marion Civil Rights Commission

ADDRESS: 1225 6th Avenue, Suite 110

CITY/STATE/ZIP CODE: Marion, Iowa 52302

PHONE NUMBER: 319-743-6307

HOURS: M-F, 8:00 am – 5:00 pm



City of Marion

Fair Housing and Outreach Plan

It shall be the policy and commitment of The City of Marion to ensure that fair and equal housing opportunities are accessible to all persons, regardless of race, color, national origin, religion, sex, sexual orientation, gender identity, familial status, disability, citizenship, political affiliation, or indigenous populations.

This will be accomplished through a program of education, designation of a Discrimination Complaint Officer, and/or development of policies and procedure for housing discrimination complaints.

The plan will incorporate directives of state and federal laws, but not limited to:

Iowa Code Chapter 216

The Fair Housing Act – Title VIII of the Civil Rights Act of 1968, as amended

Part 1: Outreach and Engagement

The City of Marion commits to providing and promoting Fair Housing and will take affirmative steps to reach beneficiaries from all racial and ethnic groups, the disabled, families with children, and income eligible beneficiaries for housing opportunities. The City of Marion will identify groups of persons “least likely to apply” as defined by The Department of Housing and Urban Development (HUD) are demographic groups in the housing market area who are “not likely to apply for the housing without targeted outreach, including marketing materials in other languages for limited English proficient individuals, and alternative formats for persons with disabilities. Reasons for not applying may include, but are not limited to, insufficient information about housing opportunities, language barriers, or transportation impediments.” The outreach and engagement plan will consider the specific needs of each of these potential applicants and strategically utilize preferred communication modes for each group. Outreach strategies in Marion may focus on those over the age of 65 which are 16% of the population or persons with disabilities who represent 12% of the population. As potential first-time homebuyers, or current renters, are more likely to be single, a household of color, and to have a lower income than area median, outreach strategies may be identified to inform these groups of the available housing opportunity and welcome them to apply.

The City of Marion shall require that any person or entity receiving city, state, or federal housing funds shall create marketing and outreach materials that:

- Identify location and a description of the available property.
- Create an application process that encourages all persons to apply.
- Provides contact information that includes community agencies available to assist with application process, if required.

Prepared: 12/1/2022
Adopted: 3/23/23

- Display Fair Housing logo and state commitment to Fair Housing and non-discrimination.

The City of Marion shall also display contact information for the Marion Civil Rights Commission and the Iowa Civil Rights Commission on a poster placed at City Hall. May additionally place Fair Housing Know Your Rights informational brochures prepared by the Iowa Civil Rights Commission in a prominent location in city offices and other public access points in Marion.

Part 2: Personalized Recovery Plan

In 2008, during the Housing and Economic Crisis, Linn County experienced a devastating flood which covered 10-square miles and damaged 5,238 housing units. The dual crises resulted in a protracted period of disaster recovery in Linn County which lasted greater than 10 years. In 2020, as Linn County transitioned from 2008 disaster recovery to planned economic development and housing expansion, a devastating derecho during a global pandemic once again decimated local housing stock as the pandemic complicated recovery. At the local level city and county officials rely upon several capabilities of the national emergency preparedness system, but most important is the provision of timely, equitable restoration of infrastructure and housing. Following the derecho, federal funding was available through disaster loans from the Small Business Administration (SBA) for damages to real estate property, excluding rental properties, which are also much more likely to be in high risk-prone areas, have fewer protective features, and not be as well maintained as owner-occupied housing. Assistance was also available through the Federal Emergency Management Agency (FEMA). According to research from the National Low Income Housing Coalition (NLIHC) FEMA programs are designed to help families with household income above 100% area median income (AMI) and are also not available for landlords to repair rental units. Following Hurricanes Katrina, Rita, and Wilma a report by the U.S. Government of Accountability Office found that 62% of owner-occupied units received FEMA household assistance, but only 18% of damaged rental units received federal assistance. In Marion, 455 households applied for household assistance. Only 100 applicants were deemed eligible to receive FEMA assistance.

In an All-Hazard Event, Linn County Emergency Management Agency (LCEMA) coordinates with both public and private organizations to coordinate operations and resource allocation. One-day after the derecho LCEMA activated the Emergency Volunteer Center. The center coordinated with the United Way of East Central Iowa in the organization of LAP-AID (Linn Area Partners in Active Disaster) a group of over 30 health and human service providers who worked collaboratively with the City of Marion to maximize resource management. Through LAP-AID several other initiatives were created 1) My Care Community, which conducted a Needs Assessment Questionnaire developed by Linn County Public Health, Iowa State University Extension and Outreach, Hawkeye Community Action Program, and Waypoint to identify needs and allocate federal, state, and local resources. 2) Providing Assistance to Community Homeowners (PATCH) program, started in Linn County to assist homeowners through the collaborative effort of local governments as well as community organizations such as Waypoint, Housing Fund for Linn County, East Central Iowa Council of Governments, Greater Cedar Rapids Community Foundation, United Way, Cedar Valley Habitat for Humanity, Cedar Rapids Bank and Trust, Neighborhood Finance Corporation, and Matthew 25. Local

municipalities and Linn County contributed American Rescue Plan Act (ARPA) funding which resulted in a total dedication of \$3.4 million project dollars from private and government sources dedicated to housing recovery in Linn County through forgivable loans to complete repairs not covered by FEMA/SBA as well as provide construction management easing financial and emotional stressors for homeowners in the area. 3) The Alliance for Equitable Housing, a multijurisdictional collaboration of area government leaders, funders, advocacy groups and nonprofits in the housing system and the City of Marion working together to form equitable solutions to the housing shortage and rehabilitation needs in the community. LCEMA maintains a Comprehensive Emergency Plan for Linn County which is updated annually. As part of this process of continual review and improvement, following the derecho an evaluation with recommendations were prepared and presented in an *After-Action Report* to guide further recovery efforts. Through this process, the first Linn County Resilience Hub was established in August of 2022 through Linn County Resolution 2022-8- 133 to enhance collaboration during the recovery phase. Surrounding jurisdictions and service providers now provide critical access to housing and basic needs assistance and resources in a year-round space at the county owned Filmore Building. Initial partnerships were formed with Feed Iowa First, the National Association for the Advancement of Colored People (NAACP) and the Salvation Army to provide access to local foods.

In the City of Marion, over 1,350 permits to rebuild, repair or replace properties damaged in the derecho were received by the Building Department during the first month after the storm. Just weeks after the storm, Marion Economic Development Corp (MEDCO) a public-private partnership between the City of Marion, Cedar Rapids Metro Economic Alliance, Marion Chamber of Commerce, Iowa Economic Development Authority, and ICR Iowa, launched a Derecho Storm Business Recovery Loan program delivering low-interest gap loans to small businesses awaiting insurance, FEMA or SBA assistance to prevent gaps in essential service delivery for residents.

In 2020, the City of Marion began an 18-month Comprehensive Plan update process participating in the *National Citizen Survey* as well as an online citizen engagement tool, Polco. Despite derecho-related setbacks Marion's strategic planning efforts have continued. In 2021, construction of Marion's third fire station was completed, and the city invested \$30,000 in public transportation nighttime services to support the community workforce.

In Spring of 2022, the new library was opened which is twice the size of the library that was damaged during the derecho. Fiscal Year 2022 infrastructure projects include the extension of 6th Avenue as well as \$2 million in other infrastructure projects including neighborhood street improvements and a water and solid waste study to accommodate future growth.

In October 2022, the *Housing Needs Analysis for the City of Marion* was completed which provided recommendations to meet housing needs through 2030. The study concluded that it is becoming "increasingly difficult for entry level buyers to find starter homes at an affordable price," that price increases were attributed to a lower number of homes available in the market and that "developing new housing products that would target first time homebuyers in locations in proximity to schools are likely to be highly successful."

The City of Marion recognizes that low-income renters have fewer financial resources, smaller social networks, and have no control over repairs to their homes following a disaster. As a result, they are more likely to be displaced from the community following a disaster and therefore their voices are not present in public meetings when recovery efforts are discussed unless dedicated outreach and communication efforts are undertaken. In the City of Marion, 25% of homeowner and 76% of renter household incomes are below 80% area median income (AMI). The Marion City Council allocated \$500,000 of ARPA funding towards housing and transit initiatives to support LMI households, which included \$60,000 to Marion Cares for the Immediate Housing Assistance Program. Each year the City of Marion funds the Marion Low- & Moderate-Income Housing Assistance Grant facilitated by the Marion Civil Rights Commission. Grant recipients in 2020 were Willis Dady Homeless Services, Marion Cares and Four Oaks Family and Children Services. In 2021, \$40,000 was awarded to Willis Dady Homeless Services, Marion Cares, and Waypoint. Further research may be needed before policies are created which address the disaster recovery funding gaps for renter-occupied housing units. In the meantime, the proposed project will address gaps in prior disaster recovery funding which disproportionately impacted the LMI population and increase diverse, attainable housing choices in Marion by providing housing units well below typical home prices to LMI households. More affordable housing options in Marion will reduce worker commute times, reduce stress on infrastructure and allow more time for family and community activities. New resiliently built housing will withstand future storms, support small business growth, and attract both new customers and skilled workers to the community. Quality schools, good jobs, health and well-being, and safe neighborhoods all depend on housing.

Part 3: Coordination with Government Agencies and Developers

The City of Marion and the project developer are committed to improving the economic welfare and housing opportunities for all Iowans through ongoing partnerships with area agencies. Future coordination may be accomplished utilizing existing agency communication infrastructure to distribute information and applications for the proposed project. Outreach and communication with local government agencies to promote the proposed project shall be conducted through collaboration with the following agencies who assist low-to-moderate income persons with credit counseling, financial counseling, legal assistance, and homeownership assistance: Iowa State University Extension and Outreach, Iowa Department of Human Services – Linn County, Iowa Legal Aid, Veterans Administration Supported Housing, Linn County Veteran Services, East Central Iowa Council of Governments, Marion/Cedar Rapids Civil Rights Commission, Linn County General Assistance, Linn County Housing Authority, Iowa Workforce Development, Iowa Department of Health and Human Services, Cedar Rapids Housing Services Division, Cares, and the Marion Public Library. Where applicable will coordinate with the USDA Rural Development Lending Program and Iowa Finance Authority Down Payment and Closing Cost Programs providing program and eligibility information to potential homebuyers.

Part 4: Coordination with Local Organizations

The City of Marion has coordinated with more than 30 health and service organizations and a dozen housing organizations through collaborations such as LAP-AID, PATCH, The Alliance for Equitable Housing, and The Linn County Resilience Hub. Future coordination may include,

but not be limited to, promotion of proposed project and assistance with credit counseling, financial counseling, language interpretation and translation, ease of access for disabled, homeownership assistance, rental assistance, utility assistance, and/or emergency shelter. The City of Marion shall establish and maintain contact with the following organizations located in the housing market area for outreach and communication with groups of persons identified as “least likely to apply” for the housing opportunity, as well as those most likely in need of further recovery assistance: Housing Fund for Linn County, Consumer Credit Counseling/Horizons A Family Service Alliance, Neighborhood Finance Corporation, Affordable Housing Network Cedar Valley Habitat for Humanity, Hawkeye Area Community Action Program (HACAP), Waypoint, Willis Dady Homeless Services, Catherine McAuley Center, Salvation Army, St. Vincent De Paul Salvage Center, Metro Catholic Outreach, Wake Up For Your Rights, Iowa Mortgage Help, Iowa Community Action Association, Helping Hands Ministry, Mathew 25 Ministry Hub, Disability Rights Iowa, Together We Achieve, Iowa Finance Homelessness Programs, and Iowa PATH (Projects for Assistance in Transition from Homelessness). Communications may be through electronic mailings, press releases, media advertisements, or public service announcements. All print media materials or advertisements will include the Fair Housing logo. Linn County shall track referrals received from community partners. Additionally, the City of Marion may coordinate with the Intercultural Center of Iowa, Path of Hope, The Refugee and Immigrant Association of Cedar Rapids, or St. Mark’s United Methodist Church, who provide linguistic support and resources to immigrant and minority cultural communities

Part 5: Language Access Plan

As described in HUD’s 72 FR 2732, the Limited English Proficiency (LEP) requirement is flexible and fact-dependent, beginning with a community-level Four Factor Analysis which looks at the following:

Factor 1: Number or proportion of LEP persons eligible to be served or likely to be encountered by the applicant subrecipient.

Iowa Economic Development Authority (IEDA) estimated the proportion of LEP persons in the service area using 2011-2015 American Community Survey (ACS) data (Table B16001: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over). LEP persons are defined as those that “speak English less than very well” in the ACS data.

Linn County	Number who speak English less than very well	Percentage
Spanish	1,138	0.54%
Other Indo-European languages	1,064	0.50%
French, Haitian, or Cajun	669	0.32%

Language other than English spoken at home in the City of Marion is 3.1% according to the 2020 American Community Survey 5-Year Estimate.

Per HUD guidelines, if LEP is 5% or less of the eligible population or beneficiaries, and less than 1000 in number no written translation is required. IEDA will translate vital documents into Spanish for the LEP Spanish population which is relatively large in Linn County and provide “I Speak” cards as well as an on-demand language line to facilitate the request of services for French, Vietnamese, Arabic, Chinese, and other Indo-European languages.

Factor 2: The frequency with which LEP individuals encounter the programs.

IEDA has determined that New Resilient Affordable SF Housing and New Housing – Rental programs may provide direct client assistance on a daily basis to LEP individuals and require enhanced language access services. IEDA will prioritize LEP training for all subrecipients in these programs.

Factor 3: Nature and importance of the activity or service provided by the program.

New Resilient Affordable SF Housing, New Housing – Rental programs and language assistance services benefit all participants including homeowners, landlords, renters, and small business owners positively impacting the economic well-being of the community.

Factor 4: Resources available to the applicant subrecipient and cost of LEP compliance.

The IEDA has established a Language Access Program Coordinator, translation of vital documents, language line services, “I Speak” cards, and website resources to provide meaningful access for LEP individuals to CDBG-DR-funded activities, programs, and services at zero cost to subrecipient.

Part 6: Steps to Affirmatively Further Fair Housing

1. Advertise, publicize, and pass an Affirmative Fair Housing Policy that will certify that the City of Marion adheres to the requirements of the federal Fair Housing Act and the Iowa Civil Rights Act of 1965.

All advertising or information regarding housing opportunities funded in all or part by the City of Marion or the State of Iowa will include the Equal Housing Opportunity logo and the Equal Housing Opportunity statement.

The City of Marion shall display the Fair Housing Logo and a link to their Affirmative Fair Housing Policy on its website.

The City of Marion shall display Fair Housing flyers which identify the Discrimination Complaint Officer and contact information in prominent locations. Additionally, flyers may be posted at other community locations.

2. In accordance with Title VIII, Civil Rights Act of 1968, as amended, the Discrimination Complaint Officer, named below has been designated for any housing-related bias or discrimination complaint.

Name: Alicia Abernathey

Title: Staff Liaison

Address: 1225 6th Avenue, Suite 110, Marion, Iowa 52302

Phone number: 319-743-6307

The Discrimination Complaint Officer will be responsible for intake and processing of all housing complaints and fair housing activities. The officer will be familiar with the complaint process and federal and state laws which address Fair Housing and shall maintain records to include the date, time, nature of complaint, and final disposition of complaints. A separate file shall be maintained to record all housing complaints, actions taken, and status of each complaint.

3. The Discrimination Complaint Officer may assist the complainant in submitting the complaint.

Elective Steps:

1. The City of Marion will include a flyer or article in the Marion Messenger, a quarterly newsletter that is distributed to all households within the City of Marion.
2. Marion City staff will attend a fair housing conference or training.