

# 2016 - 2020 Regional Fair Housing Plan

for

Montgomery County, OH  
The City of Dayton, OH  
The City of Kettering, OH

January, 2017



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## Introduction

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The U.S. Department of Housing and Urban Development (HUD) provides Federal funding to Montgomery County (hereinafter “the County”), the City of Dayton (hereinafter “Dayton”), and the City of Kettering (hereinafter “Kettering”) for their housing and community development programs through the Community Development Block Grant (CDBG) and the HOME Investment Partnerships Program (HOME). The County, Dayton, and Kettering then sub-grant most of these funds to provide services and housing benefiting low- and moderate-income persons. As a prerequisite to receiving these federal funds, entitlement communities, including the County, Dayton, and Kettering, must affirmatively further fair housing, which, in the context of Fair Housing Planning, means that these three local jurisdictions must prepare an analysis of impediments to fair housing, develop a plan to address these impediments, and maintain records of their fair housing activities. Collectively, this is known as a Fair Housing Action Plan, which becomes a part of each jurisdiction’s Consolidated Plan.

## Fair Housing

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Fair housing is defined as residents having the choice to live where they want and where they can afford without the fear or threat of discrimination. Discrimination, in this context, is any housing practice or action that is unlawful under Title VIII of the Civil Rights Act of 1968, as amended. Title VIII, commonly referred to as the Fair Housing Act, specifically provides that “...no person shall be subjected to discrimination because of race, color, religion, sex, handicap, familial status, or national origin in the sale, rental, or advertising of dwellings, in the provision of brokerage services, or in the availability of other residential real estate-related transactions.”

## Commitment to Fair Housing

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The County, Dayton, and Kettering are each committed to affirmatively furthering fair housing and to adopting a Fair Housing Action Plan, which supports their Consolidated Plans. The 2016 Regional Fair Housing Action Plan for the County, Dayton, and Kettering enhances and furthers equal opportunity in housing to all of the residents within the three jurisdictions, enabling residents to more readily seek, obtain, use, and enjoy the housing that exists within the Miami Valley region. With this in mind, the plan adopts the programmatic objectives laid out in the opening of HUD’s 1996 publication “Fair Housing Planning Guide,” which gives guidance on this process:

The Department of Housing and Urban Development is committed to eliminating racial and ethnic segregation, illegal physical, and other barriers to persons with disabilities and other discriminatory practices in housing. Additionally, the Department will use all of its programmatic and enforcement tools to achieve this goal. The fundamental goal of HUD’s fair housing policy is to make housing choice a reality through Fair Housing Planning (FHP).

## Analysis of Impediments to Fair Housing

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The Analysis of Impediments to Fair Housing is the first step in developing a Fair Housing Action Plan. The 2015 Analysis of Impediments for the County, Dayton, and Kettering, Ohio identified thirteen major impediments that this Fair Housing Action Plan addresses with Action Tasks and Goals. Additionally, the jurisdictions decided that the potential impediment of sexual orientation discrimination warranted review and monitoring and was added to the Fair Housing Action Plan as Impediment Number Fourteen.

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### 2016 Regional Fair Housing Action Plan for Montgomery County, the City of Dayton, and the City of Kettering, Ohio

***Impediment 1: Disability – The region’s supply of affordable housing that is accessible to persons with disabilities is inadequate.***

#### 1A. Increasing Accessibility in Existing Affordable Housing

Priority:

- High

Fair Housing (FH) Goals/Activities:

To increase the supply of existing affordable housing that is accessible to persons with disabilities, the County, Dayton, and Kettering will provide funding for accessible home modifications for single-family and multi-family units. Modifications may include grab bars, ramps, door widening, and the installation of strobe smoke and carbon monoxide detectors. Funds will be provided as either grants or loans depending on the income level of the client.

FH Partners:

The County, Dayton, and Kettering.

Measurable Outcomes and Timeline:

These are programs that currently exist in each of the jurisdictions. Beginning in 2017, additional resources will be directed through contracts with housing nonprofits to expand accessibility retrofit programs. Additionally, the City of Kettering will continue operating its handicapped accessibility grant program.

Outcomes will be measured by the number of housing units that are modified to be accessible through funding allocated by the County, Dayton, and Kettering. Reports on completed projects will be received and reviewed quarterly and will be incorporated into annual reports. It is anticipated that annual renewals will occur during the term of the Consolidated Plan with the overall goal to increase the number of accessible rental and owner occupied housing.

Monitoring Method/Documentation:

Quarterly reports with a summary annual report. The primary outcome or measurable will be the number of projects that are “visitable” or modified in some way to become more accessible to persons with disabilities.

Resources:

CDBG, HOME, private funding, as well as other local, state, and federal sources of funds.

## **1B. Increasing Accessibility of New Construction of Affordable Housing**

Priority:

- High

FH Goals/Activities:

To increase the amount of new construction of affordable housing that is accessible to persons with disabilities, the County, Dayton, and Kettering will work with for-profit and nonprofit housing developers to encourage construction of accessible and visitable housing units above and beyond any minimum requirements. The regional housing authority, Greater Dayton Premier Management (GDPM), will strive to ensure that new units include accessible features.

FH Partners:

The County, Dayton, Kettering, GDPM, Miami Valley Fair Housing Center (MVFHC), and local agencies and providers as well as housing developers.

Measurable Outcomes and Timeline:

This project will commence in the Annual Action Plan 2017 program year. Outcomes will be measured by the number of new accessible housing units constructed annually. Each jurisdiction will be responsible for tracking the new affordable housing units built in their area and whether or not they qualify as accessible. Reports on completed projects will be received and reviewed quarterly and will be incorporated into annual reports.

Monitoring Method/Documentation:

Quarterly reports with a summary annual report. An outcome or measurable will be the number of new, affordable, and accessible housing units.

Resources:

HOME, federal, state, and local funds.

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***Impediment 2: Disability – Newly constructed multi-family housing should be compliant with the Fair Housing Act’s accessible design and construction requirements.***

Priority:

- Medium

FH Goals/Activities:

To ensure that fair housing laws are enforced and encourage compliance with fair housing design, the County and Kettering will continue to contract with the MVFHC. Dayton’s Human Relations Council (HRC) staff will handle the enforcement services, other than testing, in Dayton. MVFHC and Dayton HRC

will develop informational material for use at outreach and education events. Additionally, jurisdictions will coordinate with local building and zoning departments to ensure Fair Housing Act compliance.

Specific activities will include:

- Testing of new construction of multi-family housing for fair housing accessibility design and construction compliance.
- Education and outreach to design and construction professionals on fair housing accessibility design and construction requirements. Outreach sessions will be provided annually, beginning in 2017.
- Analysis and evaluation of the multi-family housing that request/receive tax credits or abatements from the County, Dayton, and Kettering.

FH Partners:

The County, Dayton, Kettering, MVFHC, and Dayton HRC.

Measurable Outcomes and Timeline:

The County and Kettering will each renew agreements with MVFHC for the education and enforcement services for the year starting 2017. Dayton's contract for testing services with MVFHC will be executed by program year 2017. Annual renewals will occur during the time of the Annual Action Plan.

Monitoring Method/Documentation:

Quarterly reporting on education and monitoring outreach will be required in each contract. Semi-annual analysis and evaluation of multi-family housing applications will be tracked.

Resources:

CDBG, private funding, and other local and federal sources of funds.

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***Impediment 3: Disability – People with disabilities experience a fair housing barrier when they encounter a complicated process while requesting reasonable accommodations or modifications.***

Priority:

- Medium

FH Goals/Activities:

MVFHC and Dayton HRC will continue to conduct education, testing, and enforcement to ensure that people with disabilities are able to request reasonable accommodations or modifications without a complicated process. The County, Dayton, and Kettering will partner to host a regional landlord workshop and engage GDPM, Greater Dayton Apartment Association (GDAA), and Greater Dayton Real Estate Investors Association (GDREIA).

FH Partners:

MVFHC and Dayton HRC, GDPM, GDAA, GDREIA, the County, Dayton, Kettering, and Kettering Board of Community Relations (BCR).

Measurable Outcomes and Timeline:

A minimum of two education and outreach events will be completed per quarter by community partners. In addition, Dayton HRC's advertising budget will be expanded to include at least one television and/or radio ad per year. The number of complaints and educational events will be reported to jurisdictions quarterly. The goal of these efforts are to reduce the number of complaints each year.

Monitoring Method/Documentation:

Quarterly reports from MVFHC and Dayton HRC will be reviewed and on-site monitoring will take place as needed.

Resources:

CDBG.

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***Impediment 4: Transit – Public transit service is a barrier to fair housing because it is largely limited to higher density and developed areas, limiting housing choice, and employment opportunities.***

Priority:

- Low

FH Goals/Activities:

To ensure that fair housing laws are enforced and encourage compliance with fair housing design, a transit access map will be created and used as a tool to strategically plan transit routes and options in areas that have limited job access via public transit. The transit access map will also be used to develop housing strategies for areas of the County in order to limit housing development in areas that lack viable transit access and options. This transit access map will be overlaid with a map which identifies the number of public and affordable housing sites throughout the county. This map is referenced in Impediment Number 13a.

FH Partners:

Affordable Housing Options Committee and Greater Dayton Regional Transit Authority.

Measurable Outcomes and Timeline:

Beginning in 2017, the transit access map will be reviewed and updated annually to ensure that existing and new housing developments in the County provide viable options for transit.

Monitoring Method/Documentation:

The transit access map will be reviewed annually to ensure that existing and new housing developments are in compliance and align with the Fair Housing Act and sufficient routes are in place to provide access to housing opportunity, employment, and equity.

Resources:

CDBG.

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***Impediment 5: Race, Ethnicity and Color – Racial segregation is a persistent impediment of fair housing in the region due to income disparity, dual housing***

## ***markets and continued steering in the real estate market based on color, race and ethnicity.***

### **5A. Testing and Enforcement**

#### Priority:

- High

#### FH Goals/Activities:

Fair housing partners will align and coordinate to provide enhanced matched pair testing and enforcement for lending, steering, leasing, and sales for all protected classes to access discrimination in the housing market for both research and enforcement purposes.

#### FH Partners:

MVFHC, Dayton HRC, BCR, National Conference for Community and Justice (NCCJ) of Greater Dayton, and GDPM.

#### Measurable Outcomes and Timeline:

Matched pair testing and enforcement will be reviewed annually at a minimum, to ensure that housing practices are monitored and align with fair housing laws and to encourage compliance with fair housing design. In addition, a regional forum for mortgage lenders and brokers and continued education on racial steering will be held annually beginning in 2017.

#### Monitoring Method/Documentation:

Reports from MVFHC and Dayton HRC on housing services/education will be reviewed quarterly. Contracts for testing will be renewed on an annual basis.

#### Resources:

CDBG and other federal and local resources.

### **5B. Public Benefit Initiative Agreements**

#### Priority:

- High

#### FH Goals/Activities:

Public Benefit Initiative Agreements and activities will continually be developed and planned to ensure that fair housing laws are enforced and encourage compliance with fair housing design. These such agreements are required when banks purchase other banks and/or when a bank fails its Community Reinvestment Act (CRA) exam. These agreements should outline lending and programming activities that will benefit low-income neighborhoods and/or communities of color.

#### FH Partners:

Dayton HRC.

#### Measurable Outcomes and Timeline:

Projects and activities funded with public benefit agreement funds will need to be developed and planned over the next five years to ensure that fair housing laws are enforced and encourage compliance with fair housing design.

Monitoring Method/Documentation:

Contracts and activities completed with Public Benefit Initiative Agreements will be reviewed and monitored annually to ensure that program participants and activities are in compliance with fair housing laws.

Resources:

Private funding (primarily local lending institutions).

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***Impediment 6: National Origin – Immigrants and refugees face barriers to housing choice and housing availability.***

Priority:

- Medium

FH Goals/Activities:

To meet the needs of our growing immigrant and refugee communities, staff from all three jurisdictions will work closely with private and public organizations to assist these vulnerable residents in the struggle against housing discrimination. Educating landlords, property management companies, and organizations that assist refugees and immigrants on fair housing laws can increase capacity and referral services to the immigrant and refugee populations. Landlords and property management companies will become more aware of appropriate use of credit and background checks as well as alternate acceptable documents that foreign born applicants can use to meet housing compliance.

FH Partners:

Dayton HRC, Welcome Dayton, BCR, and MVFHC.

Measurable Outcomes and Timeline:

Utilize existing outreach workshop meetings with landlords, local organizations, and foreign born residents to educate and promote awareness of fair housing laws. Reduce the percentage of people in each subgroup experiencing issues and barriers with access to permanent housing options. Create new training opportunities to address emerging needs.

Monitoring Method/Documentation:

Each jurisdiction will collect and report on these tasks semiannually. A summary of this semiannual monitoring will form the basis for reporting in the annual review.

Resources:

The County and Kettering will continue to contract with MVFHC for this service. Dayton HRC, or its designee, will be responsible for implementing this action for Dayton. The resources for this action will be CDBG or other local funds.

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***Impediment 7: Housing Marketing – Non-compliance with Fair Housing advertising guidelines still exists.***

Priority:

- Low

FH Goals/Activities:

In order to ensure that property sellers and landlords comply with fair housing rules for advertising, MVFHC will continue to collect advertisements on a periodic basis. MVFHC will periodically collect and review online and print advertisements from sellers and landlords to detect discouraging statements that illegally specify preferences for particular types of occupants. When illegal advertisements are discovered, MVFHC will enforce the fair housing rules by filing a complaint with the appropriate jurisdiction or filing a lawsuit when appropriate.

Specific activities will include:

- Periodic collection of print and online advertisements, and review of those advertisements to discover illegal statements.
- Continued enforcement of discriminatory advertisements.

FH Partners:

MVFHC.

Measurable Outcomes and Timeline:

MVFHC will track trends through analysis of the advertisements periodically collected.

Monitoring Method/Documentation:

Annual reporting of the number of discriminatory advertisements discovered and the actions taken to enforce or resolve the violations.

Resources:

Private funding.

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***Impediment 8: Local Regulatory Issues – Regulatory policies and zoning guidelines exist that do not comply with the Fair Housing Amendments Act of 1988 and are a barrier to housing choice and housing availability.***

Priority:

- Medium

FH Goals/Activities:

MVFHC will review local zoning codes and recommend changes as needed to address restrictive and exclusionary zoning regulations. The County, Dayton, and Kettering will review these recommendations and assess whether changes to the regulations are necessary to ensure compliance with the Fair Housing Amendments Act of 1988, and work to implement changes as necessary.

FH Partners:

MVFHC, the County, Dayton, and Kettering.

Measurable Outcomes and Timeline:

MVFHC will produce an annual report which identifies all of the local zoning codes that do not comply with the Fair Housing Amendments Act of 1988. This report should also include recommended changes to these codes.

Monitoring Method/Documentation:

The number of local communities in compliance with the Fair Housing Amendments Act of 1988 should be reported on an annual basis.

Resources:

Local funding.

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***Impediment 9: Fair Housing Education and Enforcement – Ignorance and/or incorrect understanding of fair housing laws and of new regulations is a barrier to fair housing.***

Priority:

- Medium

FH Goals/Activities:

To provide greater understanding of fair housing laws and new regulations to the general public, the County, Dayton, and Kettering will continue their contracts with the MVFHC for the provision of education and outreach services. Dayton HRC will also increase its marketing and advertising budget to reach more residents with information about fair housing rights and how to enforce them through television, radio, and commuter advertising campaigns.

FH Partners:

MVFHC, Dayton HRC, the County, and Kettering.

Measurable Outcomes and Timeline:

The County, Dayton, and Kettering will each renew their agreements with with MVFHC for education and enforcement services for the year starting 2017. Dayton HRC will increase marketing and advertising about fair housing laws in 2017.

Monitoring Method/Documentation:

Quarterly reporting on education and monitoring outreach will be required in each contract with MVFHC. Dayton HRC will report its marketing and advertising efforts on an annual basis.

Resources:

CDBG and private funding, as well as other local and federal sources of funds.

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***Impediment 10: Systemic Lending Issues – Real Estate Owned (REO) disposition policies and procedures are a barrier to fair housing.***

**10a. Code Enforcement**

Priority:

- High

FH Goals/Activities:

Code enforcement activities to ensure that all bank-owned properties are maintained at the same standard throughout the community, regardless of their physical location. Local property maintenance codes should also be reviewed to ensure that they are adequate to enforce provisions on REOs, as well as educating local prosecutors on these standards.

FH Partners:

County Jurisdictions, Dayton, and Kettering.

Measurable Outcomes and Timeline:

All communities will continue to undertake code enforcement activities to ensure that properties are maintained at a high standard and that code violations will not be a deterrent to a home being marketed and sold to all households.

Monitoring Method/Documentation:

Annual reporting on code enforcement efforts will be tracked.

Resources:

CDBG and private funding, as well as other local and federal sources of funds.

**10b. Lender Education and Outreach**

Priority:

- Medium

FH Goals/Activities:

Provide training events and meetings to educate lenders. Activities will be carried out primarily by the MVFHC and the Dayton HRC. Activities include presentations to the Dayton Area Board of Realtors (DABR), as well as other events and meetings that will reach lenders.

FH Partners:

MVFHC and Dayton HRC.

Measurable Outcomes and Timeline:

Dayton HRC and MVFHC will continue to provide educational outreach to members of the DABR, as well as attend other DABR meetings and events. These events will be tracked beginning in 2017.

Monitoring Method/Documentation:

Annual reporting on Realtor and lender outreach activities.

Resources:

CDBG and private funding, as well as other local and federal sources of funds.

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***Impediment 11 – Industries that Interconnect with Residential Homeownership – Discriminatory practices in real estate, mortgage lending, residential appraisal, and homeownership insurance markets exist which limit housing choice and availability.***

**11a. Education and Testing**

Priority:

- High

FH Goals/Activities:

To alleviate discriminatory practices, MVFHC and Dayton HRC will provide education, testing, and enforcement for real estate, mortgage lending, residential appraisal, and homeowner insurance industries. Activities will include outreach meetings, paired testing, and enforcement where appropriate.

FH Partners:

MVFHC and Dayton HRC.

Measurable Outcomes and Timeline:

Number of outreach meetings and tests conducted will be reported quarterly, beginning in 2017.

Monitoring Method/Documentation:

Quarterly reporting on number of outreach meetings with various industries that interconnect with residential homeownership.

Resources:

CDBG and private funding, as well as other local and federal sources of funds.

**11B. Public Benefits Initiative**

Priority:

- High

FH Goals/Activities:

FH partners will work with the Community Reinvestment Institute Alumni Association to develop a public benefits plan to increase funds for mortgage products that expand housing choice and availability.

FH Partners:

Dayton HRC and various members of the Community Reinvestment Institute Alumni Association, which includes MVFHC, Dayton, the County, and nonprofit organizations in the region.

Measurable Outcomes and Timeline:

As the public benefits plans are completed they will be provided to community leaders for review and support. Banks will then be approached for projects and initiatives that will benefit low-income and/or communities of color. It is expected that the first of these plans will be executed in 2017.

Monitoring Method/Documentation:

Projects implemented with public benefits funds and leveraged with local resources.

Resources:

Private funding, as well as other local, state and federal sources of funds.

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***Impediment 12: Children in the Household – Familial status, or the presence of children under 18 within the household, continues to limit housing availability and choice for families.***

Priority:

- Medium

FH Goals/Activities:

FH partners will conduct education, testing, and enforcement for fair housing issues related to family status. The target audience will be primarily landlords and property managers.

FH Partners:

Dayton HRC, MVFHC, GDPM, GDREIA, GDAA, and BCR.

Measurable Outcomes and Timeline:

Education and outreach events, including regional tenant and landlord forums, will take place throughout each year beginning in 2017.

Monitoring Method/Documentation:

Number of events conducted annually; number of landlords educated; number of tenants assisted.

Resources:

CDBG and other federal and local funding.

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***Impediment 13: Public Sector – The selection process for siting public and affordable housing in the region is a barrier to housing choice and housing availability for low-to-moderate income families with children and people with disabilities.***

**13a. Public Sector Siting of New Housing**

Priority:

- Medium

FH Goals/Activities:

Where appropriate, FH partners will meet with neighborhood groups to inform individuals about proposed affordable housing projects. FH partners will work to promote opportunities for the neighborhood and housing providers to have open dialogue which could result in the acceptance of public and affordable housing in underrepresented communities. FH partners will review Ohio Housing Finance Agency's Qualified Allocation Plan related to family housing and funding priority.

FH Partners:

GDPM, Affordable Housing Options Committee (a subcommittee of the Continuum of Care (CoC)), local communities, and elected officials.

Measurable Outcomes and Timeline:

In 2017, a map will be created by Affordable Housing Options Committee that identifies the number of public and affordable housing sites throughout the county. Neighborhood meetings may be conducted by GDPM when siting new GDPM public housing and by CoC when siting homeless housing projects.

Monitoring Method/Documentation:

Map created and updated annually. Number of meetings conducted to educate communities about proposed new projects.

Resources:

HUD funding, including CDBG, as well as other local, state, and federal sources of funds.

### **13b. Lack of Landlords Willing to Accept Vouchers**

Priority:

- High

FH Goals/Activities:

Landlord education and outreach will increase the number of landlords participating in housing subsidy programs.

FH Partners:

MVFHC, GDPM, Affordable Housing Options Committee CoC, GDREIA, GDAA, and BCR.

Measurable Outcomes and Timeline:

Increase the number of participating landlords in housing subsidy programs annually.

Monitoring Method/Documentation:

A database created and updated annually which shows the number of landlords that are accepting housing subsidies. The number of meetings conducted to educate landlords about housing subsidy programs will also be tracked annually.

Resources:

HUD funding, including CDBG, as well as other local, state, and federal sources of funds.

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***Impediment 14: Sexual Orientation – Lesbian, Gay, Bisexual, Transgender, and Queer (and/or questioning) (LGBTQ) people face barriers to fair housing because of their gender identity and gender expression, limiting housing choice and availability.***

Priority:

- Low

FH Goals/Activities:

All three jurisdictions will support and enforce services with MVFHC. Dayton will contract with MVFHC for fair housing testing. Dayton HRC's staff will oversee enforcement services in all three jurisdictions. The goal is to reduce gender identity and gender expression segregation and discrimination, and to promote LGBTQ integration in housing.

FH Partners:

The County, Dayton, Kettering, MVFHC, and Dayton HRC.

#### Measurable Outcomes and Timeline:

All three jurisdictions will renew its agreement with MVFHC for education and enforcement.

#### Monitoring Method/Documentation:

Each jurisdiction will collect data and report on these tasks annually. A summary of the testing will form the basis for reporting in the annual review.

#### Resources:

Resources for this activity include funding such as CDBG, private funding, and local and federal sources for funds designated for fair housing.

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## **Monitoring and Evaluation of Fair Housing Action Plan**

The County, Dayton and Kettering will monitor and evaluate the progress made in the implementation of the 2016 Regional Fair Housing Plan for Montgomery County, the City of Dayton, and the City of Kettering, Ohio, and report on the progress and their efforts in their respective Consolidated Annual Performance Evaluation Reports. HUD will also evaluate each jurisdiction's participation in regional efforts to implement this plan's fair housing and fair lending goals.

In order to effectively implement this plan, the jurisdictions also need to develop:

- A matrix or similar tool for tracking progress on each component of the plan over the five-year implementation period;
- Appropriate resources to implement some of the strategies laid out in the plan; and
- Additional collaborative partners that can contribute direct, in-kind, and human resources to implementation of the plan.

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## **Attachments**

**Attachment 1** – *Work Program from the Agreement for Delegation of Activities* between Montgomery County, OH, and Miami Valley Fair Housing Center, Inc., for the provision of comprehensive fair housing services.

**Attachment 2** – *Work Program from the Agreement* between the City of Kettering, OH, and Miami Valley Fair Housing Center, Inc., for the provision of comprehensive fair housing services.

**Attachment 3** – *Scope of Services from the Agreement* between the City of Dayton, OH, and Miami Valley Fair Housing Center, Inc., for the provision of fair housing testing services.

**Attachment 4** – *Memorandum of Understanding* between Montgomery County, the City of Dayton, OH, and the City of Kettering, OH, on the collection, analysis and dissemination of HMDA data.

### **Endnotes**