

# **COMMENTS FROM THE AFFIRMATELY FURTHERING FAIR HOUSING (AFFH) TASK FORCE FOR THE HOUSING AUTHORITY OF THE CITY OF PITTSBURGH – MOVING TO WORK DEMONSTRATION PROGRAM FY2017 ANNUAL PLAN**

The AFFH Task Force respectfully submits the following comments to the Housing Authority of the City of Pittsburgh (HACP) for consideration. As you may be aware, the AFFH Task Force is a group of over 37 organizations and individuals working towards the goal of making sure that fair housing activities are included in all aspects of housing development. Its members include social service agencies, advocates, housing, attorneys, the State and City Commissions on Human Relations and many others.

On September 6, 2016, during its regular quarterly meeting, attendees discussed the Housing Authority of the City of Pittsburgh's (HACP) "Moving to Work" Program changes in acknowledgement of the significant role public housing authorities' play in municipal efforts to affirmatively further fair housing. In light of the ability to submit public comment, the following suggestions were provided by Task Force members for HACP's consideration.

1. In addition to Landlord Risk Reduction Fund, the AFFH Task Force discussed a fund for landlords to make property improvements to continue compliance with, or ensure new compliance with the Housing Quality Standards. In addition, the AFFH Task Force suggested small grants to landlords to improve the quality of units throughout the City. This will go towards the goal of maintaining adequate housing stock.
2. The Task Force highlighted the importance of increased outreach and education regarding the HACP's Homeownership program. There is a general lack of interest or knowledge of the homeownership program due to the inability to get a loan while utilizing the program, in addition to a significant lack of program awareness.
3. The AFFH Task Force requests clarity on the study of the Success Rate Payment Standard, and discussed the halting of the Area Exception Payment Standards except for persons with disabilities. The payment standard is important in terms of expanding housing choice, and the temporary halting of Area Exception Payment Standards will lead to restrictions from high opportunity area neighborhoods. There may be a disparate impact on the basis of race or other protected classes by a reduction of that payment standard. The AFFH Task Force asks that the HACP reconsider not proposing any Area Exception Payment Standards for 2017, while further study continues.
4. The AFFH Task Force recommends that the use of \$11 million in rental assistance as capital development to tear down existing housing should only be permitted in a plan that includes a one-to-one replacement of a new unit. There was disagreement among Task Force members on HACP's analysis that a reduced number of traditional housing units "is not inappropriate for Pittsburgh," due to population decline. Recent studies completed by the City of Pittsburgh have pinpointed the need for deeply affordable units, and a shortage of affordable housing units.