

## FAIR HOUSING ACTION PLAN

### TOWN OF ENFIELD

#### I. Policy Statement

It shall be the policy and commitment of the Town of Enfield to ensure that fair and equal housing opportunities are granted to all persons, in all housing opportunities and development activities funded by the Town, regardless of race, color, religion, gender, sexual orientation, gender identity or expression, marital status, familial status, national origin, lawful source of income, ancestry, age or mental or physical disability. This shall be done through a program of education, an analysis of impediments, designation of a Fair Housing Officer, and the development of a procedure for complaints of discrimination. This plan will incorporate the directives of State and Federal laws and Executive Orders, including, but not limited to:

- a) Title VI of the Civil Rights Act of 1964
- b) The Fair Housing Act- Title VIII of the Act of 1968, as amended
- c) Executive Order 11063, as amended by Executive Order 12259
- d) Section 104(b) of Title I of the Housing and Community Development Act of 1974, as amended
- e) Section 109 of Title I of the Housing and community Development Act of 1974, as amended
- f) Section 3 of the Housing and Community Development Act of 1968, as amended
- g) Section 503 and 504 of the Rehabilitation Act of 1973, as amended
- h) The Americans with Disabilities Act of 1990
- i) The Age Discrimination Act of 1975, as amended
- j) Executive Order 11246 (as amended by Executive Order 12375 and 12086) Equal Opportunity Under HUD contracts and HUD-assisted Construction Contracts
- k) Executive Order 12892, Leadership and Coordination of Fair Housing
- l) CGS 46a-64c, as amended

The Town of Enfield commits to providing and promoting racial and economic integration in any housing developments financially supported with Department of Housing (DOH) funding and will take affirmative steps to reach beneficiaries from all racial and ethnic groups as well as the physically or mentally handicapped and families with children, and to reach a broad range of income eligible beneficiaries for appropriate and applicable housing opportunities.

#### II. Selection of Fair Housing Officer

In accordance with Title VIII, Civil Rights Act of 1968, as amended, the Fair Housing Officer below has been designated to handle fair housing complaints and activities:

Richard Metcalf, Housing Code Inspector  
Town of Enfield, Building Department  
820 Enfield Street, Enfield, CT 06082  
Phone: (860) 253-6386, Fax: (860) 253-6400

The Fair Housing Officer is responsible for the intake and processing of all housing complaints as well as implementation of the Fair Housing Plan activities and actions. While not expected to be an "expert" in Fair Housing laws, at a minimum, the officer will be familiar with the complaint process and Federal and State laws which address Fair Housing. Records which show the date, time, nature of complaint and decisions made in the complaint process will be fully documented. A separate will maintain a record of all housing discrimination complaints and follow-up actions.

### **III. Complaint Process**

Housing discrimination complaint form such as Forms HUD903 and HUD903A (Spanish version) from HUD and form 907 from the State of Connecticut Commission of Human Rights and Opportunities, as well as a summary of actions which constitute housing discrimination, and instructions for completing and filing housing discrimination complaints, will be made available to citizens at the Enfield Building Department, 820 Enfield Street, Enfield, CT 06082. Forms and instructions can also be obtained on the Town of Enfield website at: <http://www.enfield-ct.gov/213/Housing-Matters>. Complaints need not be made on official forms to be valid.

Fair housing forms and information will also be distributed to area lenders, realtors, the Enfield Landlord Association, town libraries, the Enfield Social Services Department, and other applicable public places and agencies.

The Fair Housing Officer shall reasonably assist the complainant in submitting the complaint to the appropriate body by providing assistance in explaining the form and/or contacting the appropriate office to assist the complainant directly, and allowing the use of town phones for communication.

The individual(s) filing the complaint will then be advised of the option of filing directly with the Department of Housing and Urban Development (HUD) within one year after an alleged violation, the Connecticut Commission on Human Rights and Opportunities (CHRO) by filing a notarized complaint within 180 days of the alleged violation, or the Equal Employment Opportunity Commission, or with all three agencies simultaneously. The individual should also be advised of the option of filing suit, at his/her expense in Federal District Court or State Court within two years of an alleged violation. The individual should be further advised that if he/she cannot afford an attorney, the Court may appoint one and that suit may be commenced even after filing a complaint, if the individual has not signed a conciliation agreement and Administrative Law Judge has not started a hearing. A court may award actual and punitive damages and attorney's fees and costs. The Fair Housing Officer will keep a record of the progress on the number of complaints filed, actions taken, and the status of each complaint.

### **IV. Opportunity Mapping**

Using the Connecticut Opportunity Map, which is available at the DOH website, the town has determined that the target area for the proposed project or activity is a low opportunity area that directly borders low, moderate and high opportunity areas.

V. **Implementation and Action Steps**

The Town will take the following specific action steps and implementation activities over the next three year period following the guidelines provided by DOH.

**Action Steps**

*Encourage the creation and rehabilitation of affordable housing in a variety of locations.*

2) Participate in regional planning efforts to ensure that there is affordable housing in a variety of locations.

*Encourage the collection and analysis of data to determine if the municipality is meeting its goals to affirmatively further fair housing.*

3) Report municipal and regional racial and ethnic composition data in municipal POCD's.

*Ensure local planning documents affirmatively further fair housing.*

4) Publish the municipality's POCD on its website.

*Convene stakeholders to review proposed legislative solutions to existing impediments to fair housing choice.*

8) If the municipality's zoning ordinance does not include a statement that people with disabilities have a right to request a reasonable accommodation of a change in any zoning ordinance, add this to the zoning ordinances.

*Promote fair housing enforcement and education.*

11) Appoint a Fair Housing Officer, have him or her trained on their duties and responsibilities as a Fair Housing Officer and publicize the person's name, contact information, and job responsibilities.

13) Refer complaints of housing discrimination to the federal Department of Housing and Urban Development, the Commission on Human Rights and Opportunities (State of Connecticut) or a private fair housing agency.

**Additional Steps**

The Town of Enfield will adopt a Fair Housing Policy Statement and a Fair Housing Resolution as an indication of its commitment to Fair Housing Month during the month of April.

The Town of Enfield will display its fair housing policies/procedures and ADA policies and grievance procedure on its website.

The Town of Enfield will display Fair Housing Posters identifying the town's Fair Housing Officer, title, address and phone number in prominent locations. In addition, fair housing information will be distributed outside of traditional municipal locations including local realtors and banks.

All advertising of residential real estate owned by the Town of Enfield for sale, rent or financing will contain the Fair Housing logo, equal opportunity slogan as a means of educating the home seeking public that property is available to all persons regardless of race, color, religion, sex, mental or physical disability, sexual orientation, gender identity or expression, familial status, marital status, national origin, age, ancestry, or lawful source of income. All bid advertisements by town sponsored programs must include the phrase "Equal Opportunity/Affirmative Action Employer." The type of logo, statement or slogan will depend on the type of media being used (visual or auditory). All logos/statements must appear at the end of the advertisement.

**VI. Analysis of Impediments**

The Town will cooperate and assist the State with its periodic Analysis of Impediments and conduct a review of policies, practices, and procedures that affect the availability and accessibility of housing.

**VII. Time Table**

Most of the steps that are described in the "Action Steps" section of this plan have been carried out on an on-going basis by the Town for many years. The Town will continue to follow these guidelines as we proceed with the proposed continuation of the Housing Rehabilitation Program and with subsequent CDBG applications.

**VIII. Amendments**

The Town Manager shall amend and revise this Fair Housing Plan as required to keep current with State and Federal affirmative action laws and equal opportunity policies and procedures as well as with local actions and activities to further the purpose of the this Plan.



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Christopher Bromson  
Town Manager

4/9/19  
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Date