

**REQUEST FOR PROPOSALS**

**FOR**

**ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (AI)**

**RFP # 15 – 15**

**DUE BY**

**Monday, February 2, 2015 at 11:00 A.M.**

**IN**

**THE PURCHASING DEPARTMENT OF  
THE TOWN OF EAST HARTFORD, CT**

REQUEST FOR PROPOSALS  
TOWN OF EAST HARTFORD  
ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (AI)  
RFP #15 – 15

The Town of East Hartford, Connecticut will receive sealed proposals from qualified consultants to conduct an Analysis of Impediments to Fair Housing Choice (AI) in the Purchasing Department office, 740 Main Street, East Hartford, Connecticut until Monday, February 2, 2015 at 11:00 a.m. Proposals shall be addressed and shall be submitted sealed and marked as described in the Request for Proposal.

All proposals must be addressed to the Purchasing Office. One original (clearly identified as such) and five (5) copies of the proposal shall be submitted by Monday, February 2, 2015 at 11:00 a.m. to:

Ms. Michelle Enman  
Purchasing Agent  
Town of East Hartford  
740 Main Street  
East Hartford, CT 06108  
Fax: (860) 282-4857  
Email: [menman@easthartfordct.gov](mailto:menman@easthartfordct.gov)

Packages containing proposals shall be sealed, bearing on the outside the respondent's name and address and plainly marked, "**Analysis of Impediments**".

**Project Manager:**  
Sara Ross  
Housing Planning Analyst  
Grants Administration Office  
Town of East Hartford  
740 Main Street  
East Hartford, CT 06108  
Phone: (860) 291-7210  
Fax: (860) 289-8394  
Email: [sross@easthartfordct.gov](mailto:sross@easthartfordct.gov)

**REQUEST FOR PROPOSALS #15-15  
FOR  
ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (AI)**

**PROPOSAL DUE** February 2, 2015

**DEADLINE FOR QUESTIONS** January 26, 2015

**SUBMIT TO** Purchasing Agent Michelle Enman  
Town of East Hartford  
740 Main Street  
East Hartford, CT 06108

**ALL TECHNICAL  
QUESTIONS REGARDING  
THE SCOPE OF SERVICES  
MAY BE DIRECTED TO** Sara Ross, Housing Planning Analyst  
(860) 291-7210  
[sross@easthartfordct.gov](mailto:sross@easthartfordct.gov)

**NUMBER OF REQUIRED  
COPIES** Five (5) copies and one (1) original

**DATE ISSUED** January 15, 2015

MARCIA A. LECLERC  
MAYOR

**TOWN OF EAST HARTFORD**

740 Main Street

East Hartford, Connecticut 06108

PURCHASING DEPARTMENT

(860) 291-7270

FAX (860) 282-4857

WWW.EASTHARTFORDCT.GOV

**TOWN OF EAST HARTFORD, CT  
INVITATION TO BID**

BID #15-15

RE: R.F.P. – Analysis of Impediments to Fair Housing Choice (AI)

Proposals will be received at the Office of the Purchasing Agent, Town Hall,  
740 Main Street, East Hartford, Connecticut, 06108 until Monday, February 2, 2015 at 11  
a.m. at which time they will be publicly opened and recorded.

Information and Specifications are available at the above office or on the Town of East  
Hartford bid's website at <http://www.easthartfordct.gov/bids>.

The right is reserved to reject any or all bids when such action is deemed to be in the best  
interest of the Town of East Hartford, Connecticut.

This project is funded through the Department of Housing and Urban Development's  
Community Development Block Grant. The awarded bidder will be subject to federal  
laws and requirements.

Michelle A. Enman  
Purchasing Agent  
(860) 291-7271



## TOWN OF EAST HARTFORD, CT.

### STANDARD INSTRUCTIONS FOR PROPOSAL

1. Sealed proposals will be received by the Purchasing Agent until the date and time specified on the title sheet. Proposals received later than the date and time specified will not be considered and will be returned unopened. **Proposals will not be accepted via fax or e-mail.**
2. All proposals will be opened and recorded and are subject to public inspection. Firms may be present or be represented at all openings.
3. Municipalities are exempt from any sales, excise or federal taxes. Fees must be exclusive of taxes and will be so construed.
4. The Town of East Hartford reserves the right to reject any or all proposals or any part of any or all proposals and to waive any informality when such action is in the best interest of the town and also reserves the right to extend an awarded proposal by mutual consent and negotiate any terms, conditions and prices if it is in the best interest of the town.
5. Firms should familiarize themselves with the items and/or conditions set forth in the Request for Proposal specifications. Failure to be informed will not be accepted as an excuse from fulfillment of the requirements.
6. In case of an error in the extension or addition of prices, the unit price will govern. The Town will not be subject to any price increases after an award if not part of the original proposal terms.
7. For professional services - a selected town committee will evaluate all responses and make a recommendation to the Mayor. **If deemed necessary** by the committee, an interview may be required as part of the selection process.
8. Please include a corporate resolution with your submittal. Sample formats for Corporations and Professional Corporations, Limited Liability Company and Partnerships (including Limited Partnership and Limited Liability Partnership) are attached in this packet.

RESOLUTION FOR CORPORATIONS AND PROFESSIONAL CORPORATIONS (required)

(TO BE TYPED ON CORPORATION LETTERHEAD PAPER)

I \_\_\_\_\_, Secretary of \_\_\_\_\_,  
(Name of Corporation's Secretary) (Legal name of Corporation)  
a Corporation duly organized and operating under the laws of \_\_\_\_\_ and  
(State)  
qualified and authorized to do business in the State of Connecticut,

DO HEREBY CERTIFY that the following is a true, correct and accurate copy of a Resolution duly adopted at a meeting of the Board of Directors of such Corporation, duly convened and held on \_\_\_\_\_, at which meeting a duly constituted quorum of the Board of Directors was present and voted in favor of such Resolution.

I further CERTIFY that such Resolution has not been modified, rescinded or revoked since the date on which it was enacted, and it is at present in full force and effect:

RESOLVED: That the following Officers of this Corporation, or any one  
them: \_\_\_\_\_  
\_\_\_\_\_, (Name and title of Officer or Officers)

is empowered to execute and deliver in the name and on behalf of this Corporation contracts, bids and other documents to the Town of East Hartford, State of Connecticut, and are further authorized to affix the Corporate Seal to such documents and to bind the Corporation to such contracts, bids and other documents.

IN WITNESS WHEREFORE, the undersigned has affixed his/her signature and the Corporate Seal of the Corporation, this \_\_\_\_\_ day of \_\_\_\_\_.

(Affix Corporate Seal Below)

\_\_\_\_\_  
(Typed name of Corporation's Secretary)

\_\_\_\_\_  
SIGNATURE OF SECRETARY

Resolution for Limited Liability Company (required)  
(TO BE TYPED ON LIMITED LIABILITY COMPANY LETTERHEAD PAPER)

The undersigned, all of the members [or, if applicable, the managing member] of

\_\_\_\_\_  
(legal name of LLC)  
A Limited Liability Company duly organized and operating under the laws of \_\_\_\_\_ and  
(State)  
qualified and authorized to do business in the State of Connecticut,

DO HEREBY CERTIFY that the following is a true, correct and accurate copy of a Resolution duly adopted at a meeting of the Members of such Limited Liability Company, duly convened and held on \_\_\_\_\_, at which meeting a duly constituted quorum of the voting Members was present and voted in favor of such Resolution. We further CERTIFY that such Resolution has not been modified, rescinded or revoked since the date on which it was enacted, and it is at present in full force and effect:

RESOLVED: That the following Members of this Limited Liability Company, or any one them: \_\_\_\_\_

\_\_\_\_\_, (Name and title of Members) is empowered to execute and deliver in the name and on behalf of this Limited Liability Company, contracts bids and other documents to the Town of East Hartford, State of Connecticut, and are further authorized to seal to such documents and to bind the Limited Liability Company to such contracts, bids and other documents.

IN WITNESS WHEREFORE, the undersigned have executed this resolution, this \_\_\_\_\_ day of \_\_\_\_\_.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Have all necessary parties sign and indicate their name and title, such as member, managing member etc..

Resolution for Partnership (including Limited Partnership and Limited Liability Partnership)  
(required)

(TO BE TYPED ON PARTNERSHIP LETTERHEAD PAPER)

The undersigned, all of the partners (or, if a Limited Partnership, all of the general partners, or if a Limited Liability Partnership, all of the partners) of \_\_\_\_\_, a partnership (or, if applicable, a Limited Partnership or Limited Liability Partnership) duly organized and operating under the laws of \_\_\_\_\_ and qualified and authorized to do business in the State of Connecticut, DO HEREBY CERTIFY that the following is a true, correct and accurate copy of a Resolution duly adopted at a meeting of the voting partners of such partnership duly convened and held on \_\_\_\_\_, at which meeting a duly constituted quorum of the voting partners was present and voted in favor of such Resolution. We further CERTIFY that such Resolution has not been modified, rescinded or revoked since the date on which it was enacted, and it is at present in full force and effect:

RESOLVED: That the following partners, or any one of them: \_\_\_\_\_

\_\_\_\_\_  
(Name and title of Partners)

is empowered to execute and deliver in the name and on behalf of this partnership, contracts, bids and other documents to the Town of East Hartford, State of Connecticut, and are further authorized to seal to such documents and to bind the partnership to such contracts, bids and other documents.

IN WITNESS WHEREFORE, the undersigned have signed this resolution on, this \_\_\_\_\_ day of \_\_\_\_\_.  
(day) (month and year)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Have all necessary partners sign and indicate their name and title, such as partner, general partner, etc.

## **INSURANCE REQUIREMENTS**

### **A CERTIFICATE OF INSURANCE WILL ONLY BE REQUIRED OF THE AWARDED BIDDER**

#### **INSURANCE INDEMNIFICATION CLAUSE**

The Town of East Hartford, CT is to be named as an “**additional insured**” and an additional insured policy endorsement must be submitted with the certificate of insurance and the nature of the project is to be stated on the certificate.

#### **INDEMNIFICATION**

**AGENCY** agrees to indemnify and hold the Town of East Hartford, CT harmless against and from any and all claims by or on behalf of any person arising from or in connection with:

A: Any act, error, omission, negligence or fault of **AGENCY** or any of its agents, servants, employees and sub-contractors.

B: Any accident, injury or damage whatsoever caused to any person occurring during the performance of this contract.

Further, the **AGENCY** agrees to indemnify and hold harmless the Town of East Hartford, CT against and from all reasonable costs, counsel fees, expenses and liabilities incurred in or with respect to any such claim and any action or proceeding brought thereon; and in any case any action or proceeding shall be brought against the contractor by reason of any such claim, contractor upon notice from the Town of East Hartford, CT agrees to resist and defend such action proceeding, unless **AGENCY** causes the same to be discharged and satisfied.

#### **A. GENERAL REQUIREMENTS**

The **AGENCY** shall be responsible for maintaining insurance coverage in force for the life of this contract of the kinds and adequate amounts to secure all of the **AGENCY** obligations under this contract with an insurance company(ies) with an AM Best Rating of A-VII or better licensed to write such insurance in the State of Connecticut and acceptable to the Town of East Hartford, CT

The insurer shall provide the Town of East Hartford, CT with **Certificates of Insurance signed by an authorized representative of the insurance AGENCY(ies)** prior to the performance of this contract describing the coverage and providing that the insurer shall give the Town of East Hartford, CT written notice at least thirty (30) days in advance of any termination, expiration, or any and all changes in coverage. Such insurance or renewals or replacements thereof shall remain in force during the **AGENCY** responsibility under this contracts.

The **AGENCY** at the **AGENCY'S** own cost and expense, shall procure and maintain all insurance required and shall name the Town of East Hartford, CT as Additional Insured on all contracts, except Workers' Compensation and Professional Errors & Omissions coverage's.

**B. SPECIFIC REQUIREMENTS:**

**1) Workers' Compensation Insurance**

The AGENCY shall provide Statutory Workers' Compensation Insurance, including Employer's Liability with Limits of:

\$100,000 Each Accident  
\$500,000 Disease, Policy Limit  
\$100,000 Disease, Each Employee

**2) Commercial General Liability Insurance**

The AGENCY shall carry Commercial General Liability Insurance (Insurance Services Officer Incorporated Form CG-0001 or equivalent). As per occurrence limit \$1,000,000 is required. The Aggregate Limit will be not less than \$2,000,000. Any deviations from the standard unendorsed form will be noted on the Certificate of Insurance.

**3) Business Automobile Liability Insurance**

The AGENCY shall carry Business Automobile Liability Insurance (Insurance Services Office Incorporated Form CA-00001 or equivalent). A per occurrence limit of \$1,000,000 is required. "Auto Auto" (symbol 1 or equivalent) is required. Any deviations from the standard unendorsed form will be noted on the Certificate of Insurance.

**C. OTHERS: PROFESSIONAL SERVICES – ARCHITECTS, ENGINEERS, ET AL.**

The AGENCY shall carry Errors & Omissions coverage in the amount \$1,000,000 per occurrence for all **professional services contracts only**. If the insurance coverage is written on a claims made basis, an extended reporting period of at least 3 years after substantial completion of the project is required.

The Town reserves the right to amend amounts of coverage required and type of coverage provided based on work or service to be performed.

**D. SUBCONTRACTOR'S REQUIREMENTS:**

The AGENCY shall require its subcontractors and independent contractors to carry the coverages set forth in section B and C above and will obtain appropriate Certificates of Insurance before the subcontractors and independent contractors are permitted to begin work.

The AGENCY shall require that the Town of East Hartford, CT be named as Additional Insured on all subcontractors and independent contractors insurance before permitted to begin work.

The AGENCY and all subcontractors and independent contractors and their insurers shall waive all rights of subrogation against the Town of East Hartford, CT, and its officers, agents, servants and employees for losses arising from work performed by each on this contract.

## **A. Background and Intent**

### **CDBG Entitlement Status**

The Town of East Hartford is an entitlement community and receives a direct allocation of Community Development Block Grant (CDBG) funds. Funds are allocated through the United States Department of Housing and Urban Development (HUD). East Hartford's allocation for the 2014-2015 (Program Year 40) is \$547,539.

### **Demographics**

The Town of East Hartford is located in Hartford County, Connecticut east of the City of Hartford on the Connecticut River. As of 2010 Census estimates, the Town had a total population of 51,252.

The State of Connecticut Department of Housing tracks the percentage of affordable housing that can be found in each town throughout the state. Figures published on 7/18/14, show that in 2013, 16.65% of East Hartford's housing was considered affordable, meaning it was either publicly assisted and/or has rental subsidies or mortgages through the Connecticut Housing Finance Authority. For this reason, East Hartford is exempt from the State of Connecticut Affordable Housing Land Use Appeals Act 89-311.

The Town of East Hartford has been deemed a "distressed municipality" by the State of Connecticut Department of Economic and Community Development. According to C.G.S. Section 32-9p, the definition of a distressed municipality should be based on "high unemployment and poverty, aging housing stock and low or declining rates of growth in job creation, population, and per capita income."

## **BUDGET**

The Town of East Hartford has budgeted approximately \$35,000 for the Analysis of Impediments.

## **ESTIMATED SCHEDULE**

RFP for AI Issued	January 15, 2015
Deadline for Submission of Proposals	February 2, 2015
Evaluation of Submissions	February 13, 2015
Respondents Notified of Outcome	February 18, 2015
Contract Executed & AI Commences	February 23, 2015
Draft Completion Date	June 15, 2015
Anticipated Completion Date- Delivered to HUD	July 15, 2015

## **Summary of AI**

The Town of East Hartford is seeking proposals from experts to conduct an AI that includes:

1. A comprehensive review of East Hartford's laws, regulations, administrative policies and practices;
2. An assessment of how laws, regulations, and administrative policies, procedures, and practices impact the location, availability and accessibility of housing;
3. An assessment of conditions (public and private) affecting fair housing choice for protected classes; and
4. An assessment of the availability of affordable, accessible housing in diverse unit sizes.

## **Background**

The last AI was conducted in 2009. The 2009 AI is attached as Appendix C. As an entitlement community and as a condition of receiving Community Development Block Group (CDBG) funds, the Town of East Hartford certifies that it will affirmatively further fair housing. The Department of Housing and Urban Development (HUD) defines this obligation by requiring communities to meet the following requirements:

- Analyze impediments (AI) to fair housing choice;
- Take appropriate actions to overcome the effects of any impediments identified through the analysis; and
- Maintain records documenting the analysis and actions taken.

The Town of East Hartford completed its Plan of Conservation and Development in June 2014 (Appendix B).

## **B. Scope of Services**

Prepare an Analysis of Impediments to Fair Housing Choice (AI) pursuant to federal laws, regulations and guidelines for the Town of East Hartford. The successful bidder will conduct a comprehensive review of how East Hartford's laws, regulations and administrative policies, procedures, and practices impact the location, availability and accessibility of housing; an assessment of conditions (public and private) affecting fair housing choice for protected classes; and, an assessment of the availability of affordable, accessible housing in diverse unit sizes.

The AI will be prepared in accordance with HUD's Fair Housing Planning Guide, Volume 1. The document can be found at <http://www.hud.gov/offices/fheo/images/fhpg.pdf>. The level of review and analysis called for in "The Suggested Format for the Analysis of Impediments" HUD's Fair Housing Planning Guide (Chapter 2 – Appendix, pp 2-30 and 2-31) shall be considered the minimum acceptable standard for depth of analysis.

The AI will provide an introduction and executive summary of the analysis, jurisdictional background data, an evaluation of the Town's current fair housing legal status, and identification of impediments to fair housing choice in the public and private sector, an assessment of current public and private fair housing programs and activities and conclusions and recommendations for corrective actions to address identified impediments.

The public participation element must contain two public hearings: one at the beginning of the process and a second, following a 10 day public comment period, once a draft AI has been completed. Public comments will be included in the final bound report.

The following tasks are expected to be completed as part of the Scope of Work, at a minimum:

1. A review of impediments to fair housing choice in the public and private sector that involves:
  - a. An assessment of how the Town's laws, etc. affect the location, availability, and accessibility of housing; and
  - b. An assessment of conditions, both public and private, affecting fair housing choice for all protected classes; and
  - c. An assessment of the availability of affordable, accessible housing in a range of units sizes.
2. The review and assessment must include, at a minimum:
  - a. Examination of pertinent data regarding demographics, income, employment, and housing, as well as studies that have been completed related to fair housing and access to housing;
  - b. Examination of data regarding the nature and extent of fair housing complaints and suits; fair housing testing conducted, if any, and results; and other data that may evidence achievement of Fair Housing Choice within the Town;
  - c. Review of prior and current activities that promote fair housing, including an assessment of agencies currently providing fair housing programs in the area;
  - d. Examination of private market issues that relate to the sale or rental of housing, the provision of brokerage services, mortgage lending, insurance sales and underwriting, Home Mortgage Disclosure Act (HMDA) data, property appraisal and property management;
  - e. Evaluation of public policies and practices which affect the provision of fair housing including but not limited to public services; state and local laws, ordinances, and regulations; planning and zoning laws and decision; land use regulations; housing and community development funding policies and practices; and property tax policies including but not limited to tax exemption;
3. Outreach to fair housing stakeholders and the general public to provide the opportunity to take part in the AI development process. This public participation element includes public outreach to residents, community groups, Town departments, housing and civil rights commissions, organizations that advocate for people with disabilities, organizations working with low/moderate income persons, tenants' rights organizations, legal services programs, NAACP, and veterans organizations, as well as other agencies that will help identify existing barriers to fair housing choice in East Hartford.
4. Based on the review conducted, identify impediments to fair housing choice for the Town of East Hartford, listed in order of priority with proposed methods of corrective actions to address identified impediments.
5. Work cooperatively with the Town of East Hartford in preparing the AI.
6. Keep documentation of information gathered for the AI and the methodology used, a list of individuals and groups participating in the development of the AI, and record of outreach consultation/input activities conducted and comments/inputs received.
7. Provide periodic progress updates to the Town as requested.

8. Provide a draft of the AI report in progress for review and comment by the Town prior to submission of the final document.
9. For forums/meetings, provide a copy of agendas, meeting materials and comments/input received.
10. Provide five (5) hard copies and one (1) electronic copy (pdf) of the final AI to the Town of East Hartford.

## **PROJECT DELIVERABLES AND OUTCOMES**

Project deliverable and outcomes shall include the following:

1. An AI report based on information from current data, the public, special interest and stakeholder groups, and a review of laws, regulations, administrative policies, procedures, and practices that accurately assess housing patterns and practices within the Town of East Hartford
2. The AI will clearly identify strengths and weaknesses and make realistic and achievable recommendations for remedying deficiencies.
3. The report will satisfy HUD that the Town is affirmatively furthering fair housing in accordance with laws and regulations.

### **C. GENERAL INFORMATION**

1. The Town is an Equal Opportunity and Affirmative Action employer and does not discriminate in its hiring, employment, or business practices. The Town is committed to complying with the Americans with Disabilities Act of 1990 (ADA) and does not discriminate on the basis of disability, in admission to, access to, or operation of its programs, services or activities.

### **D. Management**

The contact person for this contract shall be Sara Ross, Housing Planning Analyst. The selected firm will assign one qualified individual who will be the firm's contact person. This person will be responsible for directing and coordinating the activities of the firm's personnel and subcontractors in all aspects of each project assigned.

### **E. General Contract Information**

The successful vendor shall be expected to execute a contract with the Town of East Hartford. The qualified individual or consultant firm will be required to deliver an insurance certificate in amounts, companies and terms acceptable to the Town of East Hartford's Risk Manager. See attached insurance requirements.

### **F. Proposal Requirements & Required Format**

Proposals must set forth accurate and complete information for each of the items listed below. At the Town's discretion, failure to do so could result in disqualification.

1. Proposer Information: Please provide the following information:
  - a. Firm Name
  - b. Permanent main office address

- c. Date firm organized
- d. Legal Form of ownership. If a corporation, indicate where incorporated.
- e. How many years have you been engaged in services you provide under your present name?
- f. Names, titles, reporting relationships, and background and experience of the principal members of your organization, including officers.

2. Experience, Expertise and Capabilities

- a. Philosophy Statement and Business Focus. A statement of the proposer's philosophy and approach in undertaking the services of the nature outlined in the RFP, as well as a description of its primary business focus.
- b. Summary of Relevant Experience. A listing of all projects that the proposer has completed within the last three (3) years must be provided, as well as all projects of a similar nature to those included in the Scope of Services in this RFP. The following information shall be provided for each organization listed under this subsection:
  - a. Organization name and the name, title, address and telephone number of a responsible contact person.
  - b. Nature of services provided and dates services started and actually completed. Please indicate, for each assignment, if it was completed within the original contract timeframe and budget. If not, please explain why.
- c. Personnel Listing. A complete listing of the staff identified in the work plan by job classification, along with their resumes. Each resume shall include the individual's qualifications and experience in the subject area.
- d. Conflict of interest. Disclose any current (within the last 3 years) business, financial, personal or other types of relationships which may pose a conflict of interest.

3. Statement of Qualifications and Work Plan

- a. Qualifications. Identify all members of the firm and define the role of each member in the project, including staff allocation during each phase. Please include resumes and project experience of all identified individuals.
- b. Work Plan. For each item listed in Section C- Scope of Services, please describe the approach that would be generally followed in undertaking the tasks.
- c. Services Expected of the Town. Identify the nature and scope of the services that would be generally required of the Town in undertaking these projects.

4. Cost Schedule. Proposals shall include a single lump-sum price for work to be performed in accordance with this RFP, inclusive of all personnel and non-personnel expenses. This price should encompass the entire Scope of Services in this RFP. Also, include a schedule of hourly rates by position for work that may be required outside the scope of services. The overall cost for the project shall be broken down in two parts:

- 1. An overall project budget detailing overall cost allocations with man-hour projections for various milestones, reflecting expenditures as follows:

- a. Professional Services
  - b. Clerical Support
  - c. Direct Expenses (auto, postage, printing, etc.)
  - d. Other
2. A phased budget including the percent of effort and resources to be allocated to each phase identified in the proposal.

*Note: The Town of East Hartford is exempt from the payment of taxes imposed by the Federal Government and/or the State of Connecticut. Such taxes must not be included in prices.*

5. Information Regarding: Failure to Complete Work, Default and Litigation.

Please respond to the following questions:

- a. Have you ever failed to complete any work awarded to you? If so, where and why?
  - b. Have you ever defaulted on a contract? If so, where and why?
  - c. Is there any pending litigation which could affect your organization's ability to perform this agreement? If so, please describe.
  - d. Has your firm ever had a contract terminated for cause within the past five (5) years? If yes, provide details.
  - e. Has your firm been named in a lawsuit related to errors and omissions within the past five (5) years? If yes, provide details.
  - f. During the past seven (7) years, has your firm ever filed for protection under the Federal bankruptcy laws? If yes, provide details.
  - g. Are there any other factors or information that could affect your firm's ability to provide the services being sought about which the Town should be aware?
6. Exceptions and Alternatives. Proposers wishing to take any exceptions to any requirement in the RFP shall state and explain such exceptions. The Town may accept proposals which take exception to any requirements in this RFP, or which offer any alternative to a requirement herein, as well as consider such exceptions and alternatives in evaluating responses. Any exception or alternative must be clearly delineated and cannot materially affect the substance to this Request for Proposals.
7. Additional Data. Any additional information which the proposer wishes to bring to the attention of the Town that is relevant to this RFP.

**G. Non-Collusive Statement**

The Non-Collusive Statement (Appendix A) must be completed and returned with your proposal.

## **H. Evaluation Process and Selection Criteria**

The applicant selected will be determined by the Town to be the most advantageous, considering price and other factors, as specified in this RFP. A selection committee will review and evaluate the proposals received. Selected qualified applicants (qualified individuals or consulting firms) may be asked to appear for an interview (in-person or via phone) to clarify issues and/or respond to questions.

The Town of East Hartford reserves the right to reject any and all proposals submitted, to request information from any applicant and to negotiate with any of the vendors regarding the terms of the contract. The Town of East Hartford intends to select the qualified individual or consulting firms that, in its opinion, best meets the Town's needs, not necessarily the vendor that proposes the lowest fees.

## **I. Rejection/Acceptance of Proposals**

The Town of East Hartford reserves the right to refuse for any reason deemed to be in the Town's best interest any and/or all proposals submitted under this Request for Proposals.

This Request for Proposals is not an offer to contract. Acceptance of a proposal neither commits the Town of East Hartford to award a contract with any individual or firm, even if all requirements in this Request for Proposals are met, or limits its right to negotiate in the best interest of the Town of East Hartford. The Town of East Hartford reserves the right to contract with any individual or firm for any reason.

## **J. Proprietary Information**

The Town of East Hartford will not disclose any portion of the proposal except to Town of East Hartford staff prior to contract award. The Town of East Hartford retains the right to disclose the name or successful selected qualified individuals or consulting firms, the financial considerations and any other information in the proposal that is pertinent to the selection of the selected qualified individuals or consulting firms.

## **K. Independent Project Cost Determination and Gratuities**

By submission of a proposal, the selected qualified individual or consulting firms certifies that in connection with this procurement:

- The financial data in this offer has been arrived at independently, without consultation, communication, or agreement, for the purposes of restricting competition, as to any matter relating to such prices with any other selected qualified individuals or consulting firms or competitor;
- The financial data quoted in this offer will not change for a period of one hundred twenty (120) days after the receipt date of this offer at the Town of East Hartford;
- Unless required by law, the financial data which has been quoted in this offer has not been knowingly disclosed by the selected individuals or consulting firms and will not knowingly be disclosed by the selected qualified individuals or consulting firms prior to award, directly or indirectly to any other qualified individuals or consulting firms or to any competitor;

- No attempt has been made or will be made by the proposer to induce any other person or firm to submit or not submit an offer for the purpose of restrictive competition; and
- No elected official or appointed official or employee of the Town of East Hartford shall benefit financially or materially from this contract.

**L. Ownership Information**

The Town of East Hartford shall have unlimited rights to use, disclose or duplicate, for any purpose whatsoever, all information developed, derived, documented or furnished by the qualified individual or consulting firms under any contract resulting from this Request for Proposal.

In the event of contract award, all data collected and other documentation produced as part of the contract will become the exclusive property of the Town of East Hartford and may not be copied or removed by any employee of the qualified individual or consulting firms without written permission of the Town of East Hartford.

**M. Federal, State and Local Employment Requirements**

The qualified individual or consulting firms selected must provide services under this RFP in accordance with all applicable federal, state, and local laws. The professional services solicited under this RFP are to be funded with federal CDBG funds. The qualified individual or consulting firms must perform its consulting services in compliance with federal laws and regulations governing the CDBG Program (24 CFR Part 570), and related federal laws, regulations and requirements. This includes, but is not limited to, non-discrimination, equal employment opportunity, and fiscal management requirements.

Federal Executive Order 12549 prohibits federal, state and local public agencies receiving grant funding from contracting with individuals, organizations, or companies who have been excluded from participating in federal contracts or grants.

## **APPENDIX A**

**TOWN OF EAST HARTFORD, CONNECTICUT**  
**REQUEST FOR PROPOSAL**  
**Analysis of Impediments to Fair Housing Choice**  
**R.F.P. #15-15**

**NON-COLLUSION STATEMENT**

The company submitting this proposal certifies that it is being submitted without any collusion, communication or agreement as to any matter relating to it with any other respondent or competitor. We understand that this proposal must be signed by an authorized agent of our company to constitute a valid proposal.

Date: \_\_\_\_\_

Name of Company: \_\_\_\_\_

Name and Title of Agent: \_\_\_\_\_

By (SIGNATURE): \_\_\_\_\_

Address: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

Email Address: \_\_\_\_\_

## APPENDIX B

Relevant documents available on-line for review:

Plan of Conservation and Development, BFJ Planning, Dated June 2014  
<http://www.easthartfordct.gov/development-planning/pages/plan-of-conservation-and-development>

East Hartford Zoning Regulations and Inland-Wetlands Regulations  
<http://easthartfordct.gov/development-planning/pages/regulations>

Fair Housing Planning Guide (HUD), Volume 1  
<http://www.hud.gov/offices/fheo/images/fhpg.pdf>

## **APPENDIX C**



**East Hartford**  
**CONNECTICUT**



**ANALYSIS OF IMPEDIMENTS TO FAIR  
HOUSING**



**FEBRUARY 2009**

Prepared by the Grants Administration Office, East Hartford, CT

## **I. INTRODUCTION**

**A.** The Analysis of Impediments (AI) to Fair Housing Choice is a requirement of the Department of Housing and Urban Development (HUD) in an effort to eliminate racial and ethnic segregation and any other identified impediments to fair housing. The fundamental goal of the Department's fair housing policy is to make housing choice a reality through Fair Housing Planning.

A community is required to affirmatively further fair housing by doing the following:

- Conduct an analysis to identify fair housing choice within its jurisdiction.
- Carry out appropriate actions to overcome the effects of any impediments identified through that analysis.
- Retain records which reflect the analysis and any applicable action.

Impediments to fair housing choice can include the following:

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

The Town of East Hartford's AI was conducted by the Housing Planning Analyst of the Grants Administration Office (GAO). The following participants provided information and input into the development of this report:

- Connecticut Fair Housing Center (CFHC)
- Capitol Region Council of Governments (CRCOG)
- East Hartford Housing Authority (EHHA)
- East Hartford Inspections and Permits Department
- East Hartford Development Department
- Housing Education Resource Center (HERC)
- Corporation for Independent Living (CIL)
- Town of East Hartford Commission on Aging
- Community Renewal Team, Inc. (CRT)
- East Hartford Social Services Department
- East Hartford Senior Services Division

## **B. Methodology**

The GAO relied heavily on data from the East Hartford 2005-2010 Consolidated Plan for Housing and Community Development, data from the 2000 U.S. Census, and data from the 2003 East Hartford Plan of Conservation and Development Land Use report.

Extensive telephone interviews and information gathering sessions were also conducted with the participants on Page 1. In addition, the following web sites were utilized:

- CRCOG
- Home Mortgage Disclosure Act (HMDA)
- Community Reinvestment Act
- State of Connecticut Department of Banking
- DataPlace
- Center for Responsible Lending
- Connecticut Economic Resource Center, Inc. (CERC)

## **II. JURISDICTIONAL BACKGROUND DATA**

### **A. Community Description**

The Town of East Hartford is an urban town located at the crossroads of Interstates 91 and 84, just east of the City of Hartford. Although this community enjoys the benefits of its strategic location near the capitol of the state, it also faces the challenges associated with being an urban community, i.e., the provision of housing and community services to a population with limited resources.

The 1960's brought a proliferation of fairly homogeneous subdivisions which today house many town residents. The "Mixmaster" interchange of two major highways, constructed during the 1950's, cut the town in two by creating a highway barrier. The 1980's, 1990's and early 2000's brought several new directions for East Hartford. These directions include: (a) the waterfront, previously overlooked, became a driving force for the future of the town; (b) the central business district and many of the Town's commercial corridors have undergone revitalization planning; and (c) most recently, the availability of Rentschler Field (600 acre site) for redevelopment has provided the Town with significant new development potential.

The construction of the UCONN Stadium at Rentschler Field along with Cabela's, a giant outdoor retail store, gives the Town a chance to redefine a substantial portion of its land area. This is an unusual occurrence for mature communities like East Hartford that have little land available for new development.

### **B. Demographic Data**

Census data comparing 2000 population figures with those from CERC's 2008 Town Profile showed that East Hartford's population increased by .88%, from 49,575 in 2000 to 50,010 in 2007. Data comparing 2000 population figures with those from 1990 showed East Hartford's minority population increased significantly. Between 1990 and 2000, East Hartford's Black population grew by 120% to 9,335; its Hispanic population (all races) grew by 79.5% to 7,552; its Asian population grew by 79.5% to 1,989; its Pacific Islander population grew by 50% to 18; and its Native American/Alaska Native population grew by 52% to 167. In contrast, the Town's White population decreased by 27% during the same period.

**C. Income**

2007 data from CERC’s Profile indicated that East Hartford’s median family income (MFI) was \$49,754; significantly lower than the Capitol Region’s of \$61,485 and the state’s MFI of \$65,859. This amount is only a \$6,901 increase from the 1990 Census (or 16.1% increase in 17 years).

In the 10-year period between 1989 and 1999, the poverty rate in East Hartford doubled from 5.4% to 10.3%. According to a Hartford Courant article dated May 22, 2002, East Hartford saw the biggest increase in poverty of any town in Connecticut during the 1990’s. This was due in great part to its proximity to Hartford (with the decrease in housing units at Charter Oak and Stowe Village public housing units) and the affordability of its housing. The median home value in town decreased from \$145,400 in 1990 to \$112,800 in 2000 and then rose to \$185,400 in 2007, well below the Region median price of \$245,000.

Comprehensive Housing Affordability Strategy (CHAS) data tables show that 26% of all White households are in the very low income (0-50% MFI) category; 38% of Black households are in the very low income category; 37% of Hispanic households; 55% of Native American households; and 32% of Asian households.

Those same data tables show that 20% off all White households fall into the 51-80% MFI category; 23% of Black households fall into this category; 28% of Hispanics households; 30% of Native American households; and 22% of Asian households.

The attached maps from the Town’s Consolidated Plan and the web site DataPlace show areas of concentration of low to moderate income households by block group.

**D. Employment Data**

As stated above, Census 2000 data indicated that East Hartford experienced the highest increase in poverty of any Connecticut town; from 5.4% to 10.3%. One of the contributing factors was the gradual downsizing of the town’s major employer, Pratt & Whitney. Once a dominant player in the defense and aerospace industry, Pratt’s influence diminished when the Defense Department’s work was awarded to competitors both in and out of the United States. In its bid to be more competitive, Pratt moved a portion of its work to out-of-state locations; mostly in the South where labor is less costly. The local economy suffered as a result; employees were laid off, and the small businesses that catered to Pratt employees experienced a downturn in their businesses.

Below is a list of East Hartford’s 2008 top seven employers:

- Pratt & Whitney 8,530
- Town of East Hartford 1,741
- Bank of America 800
- Coca-Cola Bottling Company 650
- Riverside Health and Rehabilitation Center 472
- United Technologies 448

According to 2001 State of Connecticut Labor Force statistics, East Hartford had a labor force of 25,124. Those employed numbered 24,055 and the number unemployed was 1,069 (4.3%). With the exception of the City of Hartford, all of East Hartford's neighboring communities posted lower unemployment levels both numerically and as a percentage than East Hartford.

The major non-residential development opportunity for East Hartford in the next decade is Rentschler Field. The site's direct access to the regional highway network and its size make its development of regional significance. In particular, the development of the new UCONN football stadium, along with Cabela's outdoor retail store and its connector roadway at Rentschler Field, will create substantial economic development and employment opportunities for the town's citizens.

#### **E. Age**

The town's population declined by 877 between the 1990 and 2000 Census. The break down of population shifts between the 1990 and 2000 Census is as follows: school-aged children population (ages 5-19) increased by 1,898 (24%); the adult wage-earning population (ages 20-64) decreased by 2,661 (-8%); and the elderly population (ages 65-85+) decreased by 123 (-2%).

The increase in the school-aged population impacts school enrollment, park and recreation facilities and youth services planning.

The decrease in the adult wage-earning population impacts the tax base for the town. This population is more likely to purchase homes and vehicles (paying property and vehicle taxes) which increases the town's revenue. This population is also more likely to spend their earnings in town which leads to the growth and survival of local businesses.

While the total number in the elderly category decreased, the ages between 75-85+ years increased by 777 (26%). This increase in population impacts planning for senior facilities and support services. The elderly also account for over 60% of those who fall into the extremely low income category. At the same time, housing costs (utilities, etc.) have risen steadily in contrast to the median household income. This can be a considerable economic barrier to the elderly population.

#### **F. Housing Profile**

Census data for East Hartford shows that the construction of housing units peaked prior to 1970 with nearly 80% of all units constructed prior to that time. A significant portion of the town's housing units are more than 40 years of age or older. Many of the oldest units, particularly those built before 1940, may be in substandard condition due to deferred maintenance and changes in the Building Code. Following is the number of housing units constructed by year:

<u>Year Built</u>	<u>Number of Housing Units</u>
Pre-1940	3,640 (17%)
1940-1959	8,432 (40%)
1960-1969	4,653 (22%)
1970-1979	2,632 (12%)
1980-1999	1,916 (9%)

While the Town's Building Department does not maintain statistics on the number of substandard units, 2000 Census data enumerating overcrowding, and units lacking complete plumbing and/or kitchen facilities can be used to illustrate substandard conditions. According to 2000 CHAS data tables, 797 housing units in East Hartford were overcrowded (+1.01 persons/room), 122 units lacked complete plumbing facilities and 137 lacked complete kitchen facilities. This number represents 4.9% of the town's total housing units. It is believed, however, that the majority of substandard units are suitable for rehabilitation. The Town's Building Department staff is responsible for investigating complaints associated with deteriorating properties. They have an average of 1,800 cases of housing code violations each year.

#### **G. Transportation**

East Hartford's location and existing transportation systems allows access to employment opportunities within East Hartford and surrounding cities and towns. Bus transportation is available in town and connections are easily made to Hartford and Manchester.

#### **H. Affordability**

2000 Census data showed that East Hartford's median value of owner-occupied units (a total of 10,056) was \$112,800. This number has continued to increase since Census data was collected. According to CRCOG's Home Sales Price Report for the period of July 1, 2006 – June 30, 2007, the median value for homes in East Hartford was \$188,000 as compared to the Region's median price of \$262,000. With a median price of \$188,000, the Town of East Hartford continues to be one of the few towns that remains affordable to low income families. East Hartford continues to be an extremely attractive town for home buyers in terms of affordability and low property taxes in relation to services provided.

CRCOG publishes a Housing Affordability Index which measures the affordability of the median sales price by housing type for each municipality and the region against the regional median household income, under current mortgage conditions. According to the Index, East Hartford was one of four municipalities with more than 50% of sales affordable for moderate income households.

#### **I. Rental Units**

Rental housing comprises 42.5% of the occupied housing stock in East Hartford. 2000 Census data showed that the median rent charged in East Hartford was \$621. This number was below the median rent for the Capitol Region (\$676/month) with rents ranging from \$544 - \$955. In 1990, East Hartford's median gross rent was \$574/month.

Over a 10-year period, rental rates increased only by \$47/month to \$621; significantly less than most municipalities in the region.

#### **J. Public and Assisted Housing**

The East Hartford Housing Authority (EHHA) owns and operates 11 housing complexes and also participates in the Section 8 Housing Choice Voucher Program. EHHA owns 591 federally assisted low income housing units; 491 units are for the elderly and/or people with disabilities and 100 units for families located at eight different sites.

### **III. IDENTIFICATION OF IMPEDIMENTS**

#### **Impediment #1:**

According to East Hartford's 2003 Plan of Conservation and Development Land Use report, there is very little vacant land left to develop for housing units (1,300 acres or 11% of total land area). Furthermore, this acreage does not take into consideration the physical development constraints found on vacant properties, such as wetlands, floodplains, etc. If potential development constraints were accounted for in the calculation of vacant land, it is estimated that approximately one-half of the vacant land would contain development constraints, leaving the remaining half as developable vacant land. This acreage is a mere 5% of the Town's total land area.

#### **Action:**

The declining amount of vacant land in Town indicates that future growth will likely involve "infill" development projects that fill in gaps in the existing land use pattern. In addition, many of the new developments that will occur in East Hartford over the next 10 years are likely to involve redevelopment projects. However, it should be noted that the Town of East Hartford already provides a higher percentage of high density housing than other similarly sized towns in Connecticut. In addition, East Hartford is exempt from Connecticut General Statutes, Sub Section 8-30g, of the Affordable Housing Appeals list because more than 10% of the Town's dwelling units meet the state standard of "affordable." According to the 2007 State of Connecticut Department of Economic and Community Development data, 14.94% of the Town's housing was either publicly assisted and/or has rental subsidies or mortgages through Connecticut Housing Finance Authority.

Even with virtually no developable land remaining, and with the level of affordability mentioned previously, the Town of East Hartford will continue to do its share by emphasizing the improvement of its existing housing stock utilizing Community Development Block Grant money managed by the Town's Grants Administration Office.

In addition, East Hartford's Development Department did a text amendment to the incentive development zones; in those zones it is now possible to prepare a more flexible development scenario.

**Impediment #2:**

A review of CHAS 2000 data tables indicated that very low, extremely low and low income households in East Hartford continued to struggle with the cost burden of housing. East Hartford's proximity to Hartford (poverty rate 31%), and the affordability of its housing compared to neighboring towns, has drawn many inner-city residents to town. East Hartford's poverty rate is double what it was ten years ago. The elderly are especially vulnerable to the burden of housing costs; over 60% fall into the extremely low income category. At the same time, housing costs (utilities, etc.) have steadily risen in contrast to median household income.

**Action:**

The Town of East Hartford received a \$3M Lead Hazard Control Grant from HUD in 2004 to reduce lead paint hazards frequently found in older housing, targeting low to moderate income property owners. A total of 203 units, 68 in Mayberry Village (a low to moderate income area in Town), were rehabilitated through the lead grant.

The GAO developed a program in 2007 targeting permanently disabled persons by building access ramps and enlarging one point of egress. In addition, the GAO manages a Housing Rehabilitation Program for low to moderate income persons to address boiler/furnace and roof replacement.

**Impediment #3:**

Coastal Enterprises, Inc. and the Center for Responsible Lending co-authored an intensive study in 2006 (*Predatory Mortgages in Maine/Recent Trends and the Persistence of Abusive Lending in the Sub-prime Mortgage Market*) in the state of Maine on predatory lending in the sub-prime mortgage market. According to Maine's study, predatory lending has the following key characteristics: (1) Excessive points and fees; (2) Steering; (3) Abusive Broker Kickbacks; (4) Prepayment penalties; (5) Flipping borrowers through fee-loaded refinances; (6) Mandatory arbitration; and (7) Single Premium Credit Insurance.

The low to moderate income neighborhoods in East Hartford may be vulnerable to predatory lending practices as well. According to Maine's study on predatory lending, Connecticut had the second highest cumulative foreclosure filing rate in New England for sub-prime mortgage loans in 2005 for sub-prime mortgages originated in 1999. In addition, a search of the Town's Land Records showed that approximately 67% of the foreclosures recorded during January 2004 – December 2006 occurred in low to moderate income census tracts.

Anecdotal reports of predatory lending have been reported to Housing Education Resource Center and East Hartford's Grants Administration Office. Ms. Karen Nigol, Assistant Director of HERC, stated that the pattern she observed in 2006 - 2007 in East Hartford were complaints from single female head-of-household property owners regarding predatory lending and problems with the terms of their mortgage loans. Specifically, she mentioned the high percentage of foreclosures in East Hartford which were based upon the following:

- Affordability issues; loan terms hard to meet, specifically, adjustable rates
- Multiple refinancing
- Foreclosures on second mortgages have increased

East Hartford's Grants Administration Office received approximately a dozen phone calls in 2007 from property owners with the following issues:

- May have to foreclose on property due to adjustable rate increases
- Cannot afford property upkeep
- Multiple refinancing (owner initiated; once every 2 years)

**Action:**

East Hartford's GAO, in collaboration with HERC, will hold workshops to educate and counsel East Hartford residents on the characteristics and prevalence of predatory lending.

East Hartford's Housing Rehabilitation Program's policy on subordinating loans through their rehabilitation program is to agree to subordinate only if the Town remains in third lien position. In addition, the Town will only subordinate once every five (5) years. This will help decrease the number of multiple refinances as well as put an end to questionable mortgage terms.

**Impediment #4:**

HERC indicated a lack of knowledge on the part of tenants and landlords about their legal rights/responsibilities in the area of housing. HERC's Housing Mobility Specialist, who assists clients with housing vouchers with locating appropriate housing, has observed that a number of landlords do not realize that they cannot refuse to rent to someone because the individual holds a voucher. She also finds that some clients do not realize that landlords cannot turn them down because they hold vouchers. Once the Housing Mobility Specialist informs landlords of their rights and responsibilities under the law, most comply. In cases where the landlord was not compliant, HERC refers the client to the CFHC or the Connecticut Commission on Human Rights and Opportunities. HERC reported that most clients do not report the violation, instead, they search for another unit.

**Action:**

The Town of East Hartford, along with HERC, will conduct educational workshops for tenants and landlords that focus on tenant/landlord rights and responsibilities and fair housing laws. The GAO will also refer residents in need of tenant/landlord information and/or assistance to HERC.

**Impediment #5:**

There is a lack of accessible public housing units for disabled residents, in particular, senior citizens. The EHHA has a two year waiting list for first floor accessibility at three housing complexes (Elms Village, Shea Gardens, Heritage Gardens) that do not have

elevators. This causes difficulties for the elderly living on upper floors when they become incapacitated. Another impediment for the disabled is that there are only a few units equipped with accessible bathrooms or kitchens.

Regarding obstacles for accessibility in the private sector, CFHC reported that they received five calls during the past year from East Hartford tenants who required renovations to their apartments in order to make them accessible. In three of the cases, CFHC was able to assist the tenants because they had available funds to make the changes on their own. In the two other cases, the landlord was not legally obligated to make reasonable modifications and the clients did not have funds available to make the changes.

**Action:**

EHHA does offer disabled seniors living in inaccessible units the option of moving to a high rise that has elevators. These units do not have a waiting list. The EHHA also has plans to renovate ten units in four complexes through their Capital Fund Program and are willing to apply for additional funding if it becomes available.

**IV. EVALUATION OF PUBLIC AND PRIVATE SECTOR**

**A. Public Sector**

**East Hartford Housing Authority**

As stated previously, EHHA owns and operates 11 housing complexes and also participates in the Section 8 Housing Choice Voucher Program. EHHA owns 591 federally-assisted low income public housing units; 491 units for the elderly and/or persons with disabilities and 100 units for families located in eight different sites. The unit size and distribution are:

Efficiencies	112
1 Bedroom	391
2 Bedroom	42
3 Bedroom	36
4 Bedroom	10

The number of vacant units as of August 15, 2008 was 20 and 463 families were on EHHA's housing waiting list. Of this number, 92% of the families were in the extremely low income (0-30% MFI) category and 8% of the families were very low income (31%-50% MFI).

EHHA owns and manages three State housing complexes: King Court, a moderate-income family complex consisting of 60 two-bedroom units and 20 three-bedroom units; Hutt Heights, a 30-unit complex for a mixed population consisting of 16 efficiency units and 14 one-bedroom units; and Veterans Terrace & Extension which is funded under the Section 8 Substantial Rehabilitation Program. Veterans Terrace & Extension consists of 150 family units: 96 two-bedroom units and 54 three-bedroom units.

EHHA has established preferences for admission into its housing units. Date and time of application are utilized to determine the sequence within the following preferences: (a) those who meet income requirements (income targeting regulations); (b) East Hartford residents who are working or who are disabled and unable to work, or families who have one member employed within East Hartford; (c) East Hartford residents who are unemployed; (d) non-residents who are working or who are disabled and unable to work; and (e) all others.

EHHA plans on the following capital improvements in the next few years: (1) site improvements including repaving parking lots, replacing damaged sidewalks, new decorative fencing, etc.; (2) exterior door improvements at two complexes; (3) closet door replacements in all apartments at Meadow Hill; (4) boiler replacements at Elms Village; (5) accessibility upgrades at three Rochambeau apartments; (6) landscaping improvements; (7) exterior lighting improvements; and (8) flat roof replacement at Elms Village.

## **B. Private Sector**

### **Banking and Finance Industry**

Data available from the 2000 Census and the HMDA web site regarding fair housing practices demonstrates that East Hartford's financial institutions are aware of and comply with fair housing lending patterns. Several regional banks (Bank of America, Banknorth Connecticut) have offered liberal underwriting and favorable lending terms to low- and moderate-income first-time homeowners wishing to purchase a home in East Hartford. In addition, statistics available from the HMDA web site indicate that loan application approvals in the low/moderate income areas in East Hartford are similar to the general population.

However, as stated previously, it should be noted that the Town Clerk's Office recorded a total of 57 foreclosures from the period of January 9, 2004 – December 18, 2006, 38 of which (67%) occurred in the low to moderate income areas. While it is obvious that low to moderate income property owners are receiving equitable treatment from lending institutions in terms of loan approvals, the property owners may not be able to afford the mortgage payments and property upkeep.

## **V. EVALUATION OF JURISDICTION'S CURRENT FAIR HOUSING LEGAL STATUS**

### **A. Housing Education Resource Center**

Fair Housing services are provided to the Town of East Hartford by HERC, a non-profit housing organization dedicated to assisting individuals and organizations resolve housing issues. The Town of East Hartford continued its support of fair housing by providing \$8,000 annually in CDBG funds to HERC. Following are requests (by number of households) received by HERC during September 1, 2007 – June 30, 2008:

Eviction information and counseling for tenants      3

Eviction information and counseling for landlords	1
Request for market rental listing/info	2
Emergency Shelter request/info	2
Lease/rental agreement questions	1
Rental assistance program info/resources	2
Rental rights info for tenants	41
Security deposit questions/problems	3
Homeownership counseling	2
Fair housing laws/information	13
Foreclosure counseling	10
<b>Total</b>	<b>80</b>

HERC reported that the pattern during 2006, in terms of fair housing complaints, was from homeowners regarding predatory lending. As stated previously, four complaints were from single female head-of-households who stated that there was something “wrong” with their mortgage terms. Another pattern was a high percentage of foreclosures.

As part of the Consolidated Planning process, a survey document was placed on the Town’s web site, mailed to 35 community organizations and 12 faith-based organizations, placed in the main Town library and the office of the federally-funded WIC program querying residents about the needs of the town. A section of the survey was devoted to asking respondents about housing discrimination in East Hartford. Eighty-one persons completed that section of the survey document. Of that number, 17 (28%) believe that housing discrimination is an issue in their neighborhoods. When asked if they, themselves, had experienced discrimination in housing, 8 (10%) answered affirmatively: 7 by their landlords and 1 by a mortgage insurer. Only 1 of the 8 reported the incident. Most felt that they were discriminated against based on “family status.” There currently are no pending court suits related to fair housing violations/discrimination.

**B. Connecticut Fair Housing Center**

The mission of the CFHC is to ensure that all people have equal access to housing opportunities in Connecticut. Because people with limited incomes are particularly affected by housing discrimination, the center places special emphasis on providing legal assistance to low-income individuals and families.

The Town of East Hartford received assistance from CFHC through several consultations regarding fair housing complaint patterns and trends and ways to ameliorate them. The following is a break down of fair housing complaint cases opened at CFHC by East Hartford residents between January 1, 2007 and September 10, 2008:

Disability	5
Race	2
National Origin	1

Source of Income	9
Predator Lending	8
Landlord/tenant	2
<b>Total:</b>	<b>27</b>

## VI. EXISTING PROGRAMS AND SERVICES

### A. Neighborhood Revitalization Activities

In 2001, the Town's Health and Social Services Department (H&SS) and the EHHA formed an alliance to focus attention on residents in two low-income housing developments in town: Veterans Terrace and Hockanum Park. Extreme poverty and complex health and social service issues were cause for concern. Sixty-two percent of households in Veterans Terrace and seventy-three percent of households in Hockanum Park have annual incomes of less than \$14,999. Veterans Terrace is located in a census tract that is designated as both a Medically Underserved Population and Health Professional Shortage Area while Hockanum is located within a census tract designated as a Medically Underserved Population. Forty-one percent of residents of both developments are "minorities" as compared to the town's overall average of thirty-five percent. The H&SS and the EHHA called their one-year grant initiative "REACH" (Residents Empowered to Act for Community Health) and the EHHA donated office space in each development out of which H&SS could operate "Family Health Centers." To provide residents with social service programs and health education activities, REACH formed a collaborative group called "Community Partners" comprised of social service and health care providers willing to donate services to neighborhood residents. While REACH has accomplished many of its objectives, including the formation of resident associations in each of these developments, what the initiative lacks is funding for permanent staff to oversee neighborhood activities, and funding for additional programs.

In 2002, the Town and University of Connecticut School of Law's Connecticut Urban Legal Initiative (CULI) entered into an Agreement to use CDBG funds to build the capacity of the Mayberry community based organization (CBDO) to create a housing revitalization plan for Mayberry Village, and to explore funding to implement the plan. In 2004, CULI was again awarded CDBG funds to work with the Mayberry CBDO to implement many of the recommendations contained in the Mayberry Revitalization Plan. One of the recommendations was that the Town pursue grant funds from the federal Lead Hazard Control Program to be used to rehabilitate housing containing lead paint hazards, with a set-aside for Mayberry Village. The Town followed through on this recommendation and was successful in securing \$3M to be used over a three-year period (2004-2007) to address lead hazards and exterior code violations in low to moderate income housing units. CDBG funds were used as a 10% match. As a result of this three year initiative, 203 housing units were rehabilitated to make them lead-safe and compliant with exterior housing codes; 68 (33%) of these units were in Mayberry Village.

In 2006, Rebuilding Together East Hartford assisted 13 households with needed repairs. Of the 13, five were occupied by extremely low income households (0-30% MFI); six were occupied by very low income households (31-50% MFI); and two were occupied by very low income households (51-80% MFI). Unfortunately, this program was cancelled after 2006 due to a lack of volunteers willing to commit the time to plan the event and the lack of skilled craftsman (electricians, plumbers, carpenters) willing to volunteer.

During the 2007-2008 program year, significant improvements were made to Martin Park, a facility located in a low to moderate income residential area off Burnside Avenue. New flooring and patricians were installed in the pool house and nearby lavatory; a new storage unit was installed; electrical wiring was upgraded; and a new wood shingle roof was installed on the historic Blacksmith Shop.

Another improvement made during the 2007-2008 program year was to the walkway of the historic Center Cemetery, located off of Main Street. In addition, a patio area just inside the cemetery was completed.

#### **B. Housing and Homeless Priorities**

The Town has continued its commitment to upgrading the housing stock of low to median income households in two ways: (1) completing an access ramp program for owner-occupied housing inhabited by persons with disabilities; and (2) through its CDBG funded housing rehabilitation program.

The Town funds a number of public service activities aimed at sheltering the homeless and providing support to elderly citizens residing in non-institutional settings. Each year the Town uses CDBG funds to provide support to the East Hartford Community Shelter through its managing agent, the Community Renewal Team of Greater Hartford, Inc. The Shelter has the capacity to house and feed 15 men and 25 women and children daily. Shelter staff works with the homeless to help them find permanent housing in the community or supportive housing. The coming year's preliminary Action Plan for the CDBG Program also includes \$35,000 for Shelter operating expenses.

The Town provides support services to the frail elderly with CDBG funds and funds from the North Central Area Agency on Aging. These services recently consist of a grocery delivery service, a chronic disease management program, a support group for grandparents raising their grandchildren, and an Elderly Outreach Worker.

The Town funds HERC to assist town residents with issues that are housing related, such as landlord-tenant disputes, security deposits, foreclosure procedures and Housing Code violation problems.

Lastly, from year to year the Town may fund a number of other public service activities designed to prevent homelessness and ensure that town residents have decent housing. Programs provided by organizations such as Interval House or the Salvation Army's Homeless Prevention Program are some examples.