



ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

**CITY OF MIAMI
FY2024-2028**

Prepared by: Florida Housing Coalition
in cooperation with the Dept. of Housing & Community Development

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EXECUTIVE SUMMARY

Introduction

The U.S. Department of Housing and Urban Development (HUD) has a commitment to eliminate discriminatory practices in housing and an obligation under Section 808 of the Fair Housing Act (FHA) to encourage the adoption and enforcement of fair housing laws in federally funded housing and community development programs. Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.) and regulations in 24 CFR part 1, prohibit discrimination in any program or activity funded in whole or in part by federal funds made available under this part. In addition to its responsibility for enforcing other Federal statutes prohibiting discrimination in housing, HUD has a statutory obligation under Section 109 of the HCD Act of 1974, Title I, which prohibits discrimination based on race, color, national origin, disability, age, religion, and sex within federal programs or activities.

As a recipient of Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons With AIDS (HOPWA) funds, the City of Miami is obligated to certify to Affirmatively Furthering Fair Housing (AFFH). To satisfy the certification requirement, and in pursuit of equal access to opportunity and affirmative enforcement of the FHA, the City of Miami has consciously committed to supporting housing equality by developing an Analysis of Impediments to Fair Housing Choice.

Purpose

Equal access to housing is fundamental to the health, livelihood, and success of residents, and is an important component of the long-term sustainability of communities. Strong enforcement and affirmative outreach on fair housing law and policy strengthens the pursuit of personal, educational, and employment goals at the individual level and supports equitable access to opportunities in the community. In recognition of equal housing access as an essential right, the federal government, the state of Florida, and the City of Miami have all established fair housing choice as a right protected by law.

Segregated housing causes unequal education, unequal access to jobs, and unequal income. Studies have shown the relationship between housing, education, jobs, and the ability to build equity through homeownership.

This plan analyzes impediments to fair housing choice including any actions, omissions, or decisions taken because of a resident or household's protected class under the FHA or any other arbitrary factor which restricts housing choices or the availability of housing choices. Pursuant to HUD regulation 24CFR91.225(a), to receive entitlement funds, each entitlement jurisdiction must certify that it will affirmatively further fair housing (AFFH). HUD interprets certifying elements to include:

- Analyzing housing discrimination in jurisdictions and working toward its elimination.

- Promoting fair housing choice for all people.
- Providing racially and ethnically inclusive patterns of housing occupancy.
- Promoting housing that is physically accessible to, and usable by, all people, particularly individuals with disabilities.
- Fostering compliance with nondiscrimination provisions of the FHA.

This plan analyzes conditions in the private market and public sector that may limit the range of housing choices or impede a person’s access to housing. While this report also assesses the nature and extent of housing discrimination, the focus is on identifying impediments that may prevent equal housing access and limit access to opportunity and developing solutions to mitigate or remove such impediments.

Methodology

The preparation of this plan included identifying strengths and weaknesses in housing practices and recommending courses of action to improve upon deficiencies identified in the study. The analysis included a review of background data on the jurisdiction including demographics, segregation and integration patterns, existence of racial/ethnic concentrated areas of poverty, access to affordable housing, access to homeownership and economic opportunities, access to community assets, and local and state policies and practices impacting fair housing. Extensive engagement with local stakeholders was also an important component of the analysis. This plan was prepared in accordance with HUD’s *Fair Housing Planning Guide, Vol. 1* and the *Notice of Proposed Rulemaking (NPRM) entitled “Affirmatively Furthering Fair Housing”*, published in February 2023. Definitions and data resources relied upon for the analysis can be found as appendices to this plan.

Community Participation

The city implemented a robust public participation process intended to solicit meaningful input towards identifying impediments to fair housing. The city makes every effort to hear from residents, service providers, housing partners, and other stakeholders on fair housing issues and goals and implemented a hybrid approach to consultation by conducting both on-site and virtual engagement. Community engagement was ongoing June 2023 – December 2023.

Throughout the development of the Analysis of Impediments, the City of Miami complied with all applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for underserved and marginalized populations, including individuals with disabilities and limited English proficient (LEP) residents. To support inclusion and provide meaningful access to participation, all print materials and digital platforms used to solicit input were formatted for accessibility and city staff were available to receive and comply with any requests for accommodation. In addition, all notices were prepared in English and Spanish to support inclusion of residents and stakeholders with limited English proficiency. Notices and engagement platforms were also available to be translated to Haitian Creole.

Community Meetings

During the month of November 2023, city staff presented on fair housing and the Analysis of Impediments at two public meetings to solicit input from residents and stakeholders. Public meetings were held to provide forums for residents of the study area and other interested parties to contribute to the identification of problems, issues, and barriers to fair housing choice. Meeting dates, times, and locations are listed below. Meetings were held in the evening to provide working residents and stakeholders with increased opportunities to attend. These meetings were advertised via flyers and emails distributed by the city and a Public Notice was published in the Miami Herald on November 15, 2023. Notes were taken of the public comments at all meetings and comments received were considered and incorporated into this analysis.

On-site engagement events included:

Public Meetings	
Date/Time	Place
Thursday November 30, 2023 5:00 p.m. - 7:00 p.m.	City Commission Chambers 3500 Pan American Drive Miami, FL 33133
Wednesday December 6, 2023 6:00 p.m. - 8:00 p.m.	Charles Hadley Park, Community Room 1350 NW 50 Street Miami, FL 33142

Fair Housing Survey

A fair housing survey was designed to collect input from a broad spectrum of the community and receive responses from residents across the study area. The survey consisted of 22 distinct questions, allowing a mixture of both multiple choice and open-ended responses. The survey was also available in English and Spanish, and translation was available for Haitian Creole. In all, there were 27 responses to this survey. The link to the online survey was distributed through various email distribution lists, posted on city websites and social media accounts, and distributed at the community meetings.

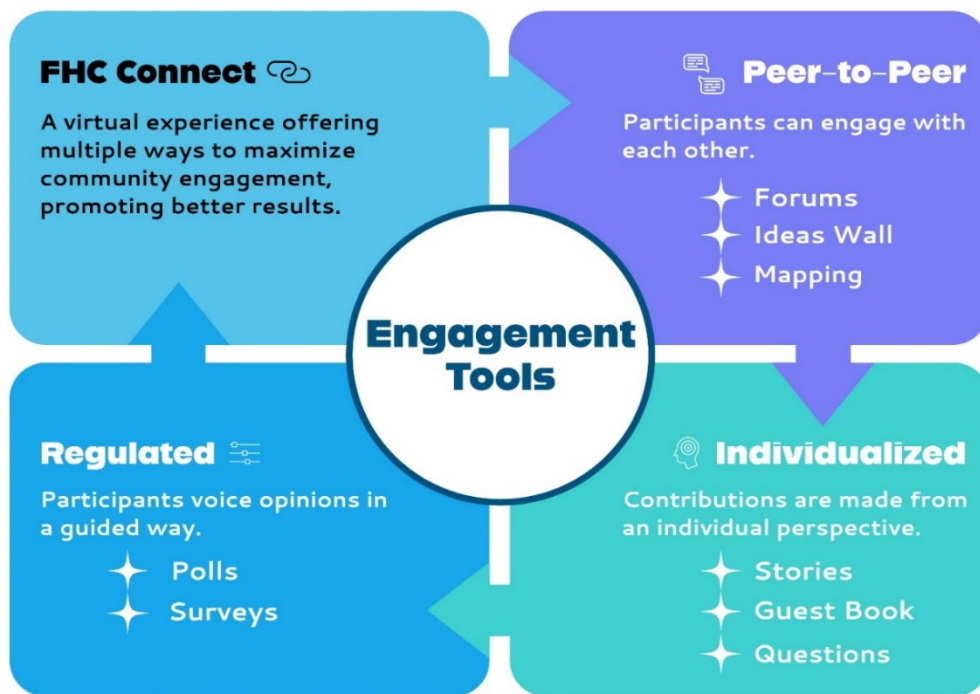
FHC Connect

Traditional methods of outreach often unintentionally exclude underserved populations, particularly protected classes focused on in the Analysis of Impediments. The city recognized this

and committed to making changes to its planning process with the intention of eliminating barriers to participation. While the city complied with federal citizen participation regulations, a key effort made to broaden participation was providing a virtual engagement experience through FHC Connect. The city made available two project specific FHC Connect pages, one in English and one in Spanish.

FHC Connect utilizes current technology to meet the increasing demand for a virtual presence. Outreach has changed, particularly since the pandemic, and FHC Connect is a progressive outreach method for maximizing citizen participation. This unique virtual experience is an all-in-one community engagement platform offering a set of comprehensive tools and widgets to collect stakeholder input and data. The platform allowed residents and stakeholders to engage in a variety of ways through a webpage dedicated to the city’s Analysis of Impediments. In addition, the platform complies with Web Content Accessibility Guidelines (WCAG), offers convenience, and the ability to engage at a comfortable pace. These features often increase participation by marginalized populations. Available features of FHC Connect include:

The
and



public

stakeholders were invited to participate virtually via the FHC Connect platforms which offered multiple ways to engage and provide input. Through these project specific sites, residents, service providers, housing partners, and other stakeholders were provided the opportunity to complete a fair housing survey, a fair housing quick poll, comment on draft documents through the guest book, and ask questions privately about fair housing.

Stakeholder Consultation

Stakeholders were consulted directly by attendance at community meetings or through email consultation. Direct discussions were had with neighbors and service providers from Vizcaya Roads Homeowners Association, Miami Historic East Shenandoah Homeowners Association, Liberty City Trust, A Leap of Faith including, Charles Hadley Park Neighborhood Association, Inc., Stanley Young Ministries, Mosaico Tenants Association, Curley’s House, Charles Handle Park, and City Commission. Email consultations were conducted with Miami-Dade County, the Housing Authority, and Florida Commission on Human Relations.

Fair Housing Findings and Goals Summary

Refer to the Fair Housing Strategic Plan found on page 112 of this analysis.

DEMOGRAPHICS

Population

According to the Shimberg Center for Housing Studies, the City of Miami had an estimated population of 459,225 people in 2022, which accounted for approximately 16.7% of Miami-Dade County’s total population. Growth since the 2010 Decennial Census has been significant, with over 50,000 new individuals residing in the City. By 2040, Miami’s population is estimated to grow by 18.66%, adding an additional 85,684 new residents. The Shimberg Center also shows a significant increase in population in the County as well.

According to the U.S. Census, Miami-Dade County had the largest net gains from international migration (54,457), and the largest net loss of domestic migration (-38,132) between 2022 and 2023. The net population increase in Miami, the international migration data, and the demographic trends suggests that a large share of Miami’s population may be undocumented and remains unreported.

City of Miami and Miami-Dade Population Trends and Projections, 2010 to 2050									
Geography	2010	2020	2022	2025	2030	2035	2040	2045	2050
Miami	399,457	442,241	459,225	476,478	502,522	525,251	544,909	562,963	580,603
Miami-Dade County	2,496,435	2,701,767	2,757,591	2,826,904	2,928,202	3,010,902	3,076,908	3,133,584	3,186,897

Source: Population Projection, Shimberg Center for Housing Studies

Household Composition/Familial Status

According to the 2022 5-Year American Community Survey (ACS), the City of Miami has 186,137 households, with an average household size of 2.33 members. Delving into the composition of these households, only 53.8% of all households are classified as family households where there are either couples or children present, while nonfamily households make up 46.2%.

Among family households, married-couple households make up 57.2%, followed by female households with no spouse present which make up approximately 29.9% of all family households. Also of note is that of all households with children, 55.2% are married households, 36.2% are female-headed households, and 8.6% are male-headed households.

Regarding the age of own children in households: approximately 22.5% of Miami households include one or more individuals who are under the age of 18. At the other end of the age spectrum, 37.4% of households consist of at least one member who is 60 years of age or older.

Households with more than one resident where at least one member is age 60 or over make up 37.4% of households, followed by households with only one resident at 36.7%, followed by households where one of the residents is at least 65 years or over at 28.6%, followed by

households with children under 18 years old at 22.5%. Households where all members are 65 years or over make up 11.5% of the total households in Miami.

Miami Population by Families and Households					
	Total	Married-couple family household	Male householder, no spouse present, family household	Female householder, no spouse present, family household	Nonfamily household
HOUSEHOLDS					
Total households	186,137	57,252	12,905	29,992	85,988
Average household size	2.33	3.23	2.94	3.38	1.28
FAMILIES					
Total families	100,149	57,252	12,905	29,992	(X)
Average family size	3.12	3.19	2.67	3.19	(X)
AGE OF OWN CHILDREN					
Households with own children of the householder under 18	35,796	19,765	3,066	12,965	(X)
SELECTED HOUSEHOLDS BY TYPE (%)					
Households with one or more people under 18	22.5%	38.2%	29.1%	53.0%	0.4%
Households with one or more people 60 and over	37.4%	37.4%	43.5%	38.4%	36.1%
Households with one or more people 65 and over	28.6%	(X)	(X)	(X)	28.2%
Householder living alone	36.7%	(X)	(X)	(X)	79.5%
65 and over	11.5%	(X)	(X)	(X)	24.9%

Source: Families and Households, 2022 ACS 5-Year Estimates Table S1101.

Race/Ethnicity

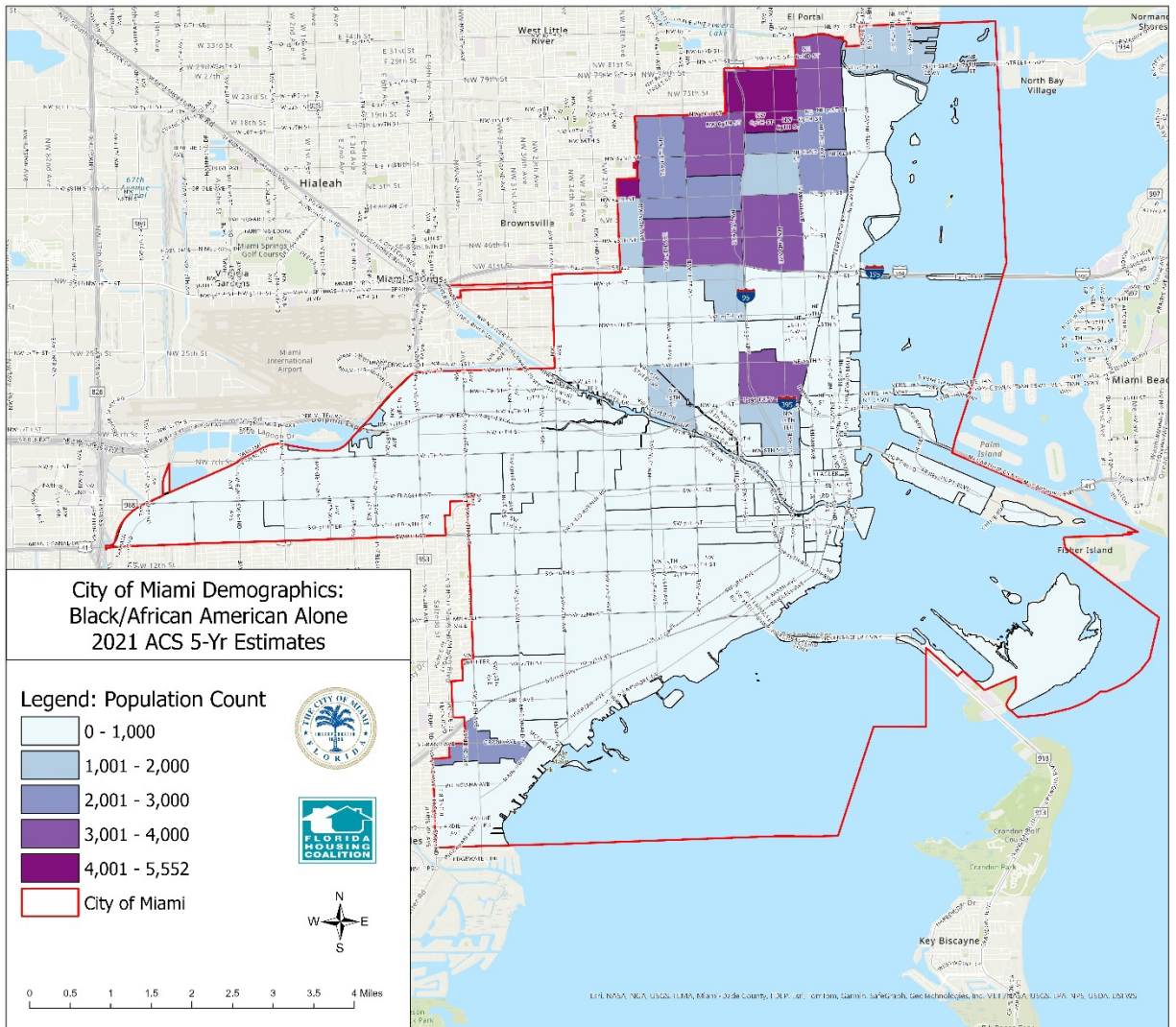
In Miami, 72.3% of the population identifies as being of Hispanic ethnicity of any race and this dominance in the region has remained consistently high over time. When looking at race alone, census data reports the largest racial group to be White, making up 45.5% of the population. The second largest racial group is Two or More Races at 32.3%. These two racial groups saw drastic changes between 2010 and 2022, as Non-Hispanic White individuals decreased by 27.4%, and Two or More Races increased by 31.1%. This can likely be explained by both migration changes and changes in how people choose to identify themselves and report their ethnicity.

The Black population is the next largest racial group, comprising 14.1% of the total population. The number of Black residents represents a drastic decrease from 2010, when the Black population was 21.2%. All the remaining racial groups combined represent 8.2% of the city's inhabitants in 2022, with individuals identifying as "Other Race Alone" at 6.4%.

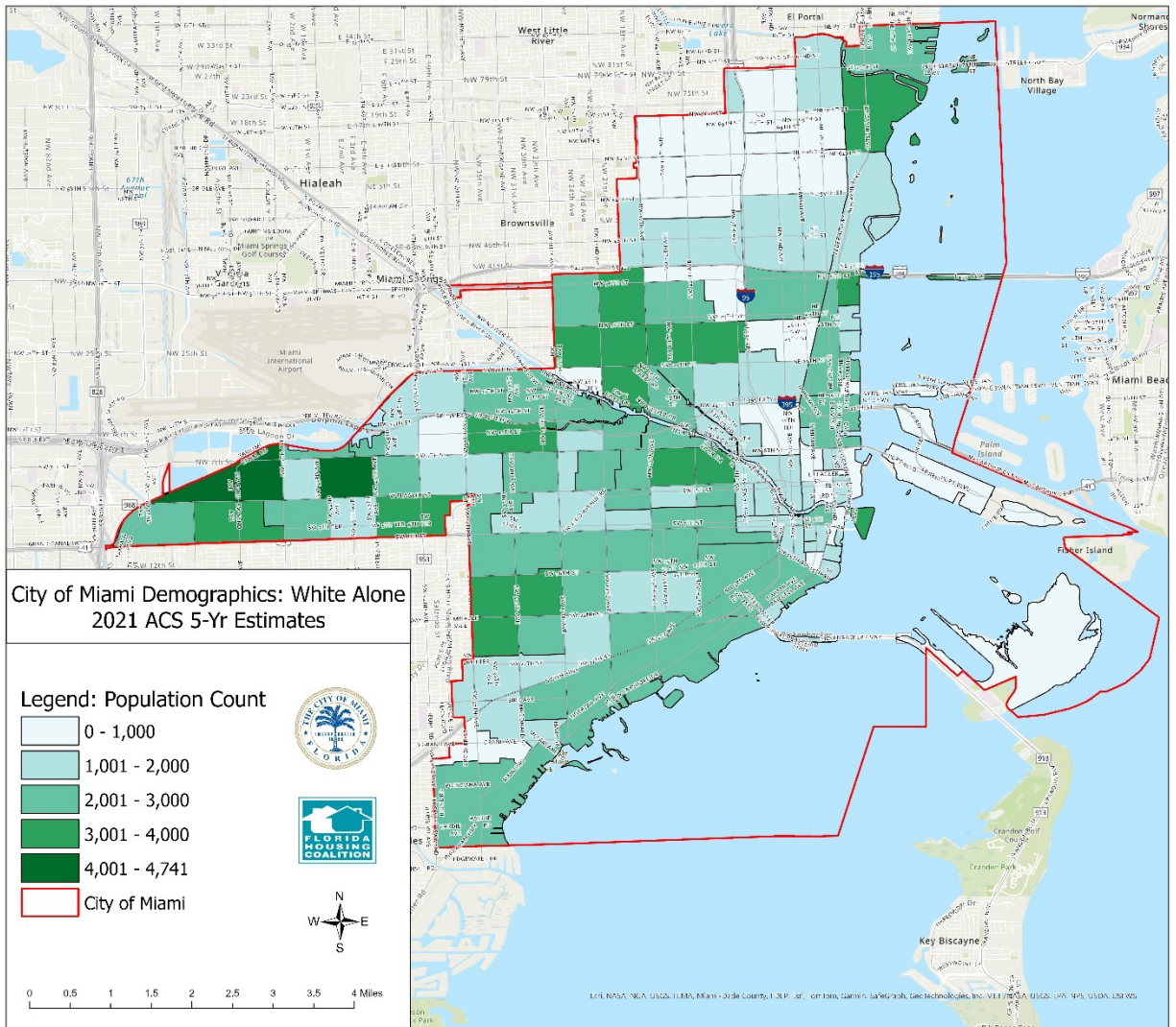
City of Miami Race and Ethnicity Distribution, 2010 to 2022 Comparison				
	2010		2022	
Race Alone – Any Ethnicity				
White Alone	284,942	72.8%	201,391	45.4%
Black or African American Alone	83,006	21.2%	62,634	14.1%
American Indian/Alaska Native Alone	229	0.1%	1,477	0.3%
Asian Alone	3,356	0.9%	6,481	1.5%
Native Hawaiian/Pacific Islander Alone	41	0.0%	42	0.0%
Other Race Alone	15,201	3.9%	28,299	6.4%
Two or More Races	4,683	1.2%	143,341	32.3%
Race – Non-Hispanic				
White Alone	39,792	10.2%	53,010	11.9%
Black or African American Alone	71,037	18.1%	56,570	12.8%
American Indian/Alaska Native Alone	38	0.0%	328	0.1%
Asian Alone	3,007	0.8%	5,908	1.3%
Native Hawaiian/Pacific Islander Alone	41	0.0%	42	0.0%
Other Race Alone	1,035	0.3%	865	0.2%
Two or More Races	1,020	0.3%	6,343	1.4%
Ethnicity – Any Race				
Hispanic	275,488	70.4%	317,370	72.3%

Source: 2022 ACS 5-Year Estimates Table DP05; Demographics and Housing, and 2010 ACS 5-Year Estimates Table DP05, Demographics and Housing.

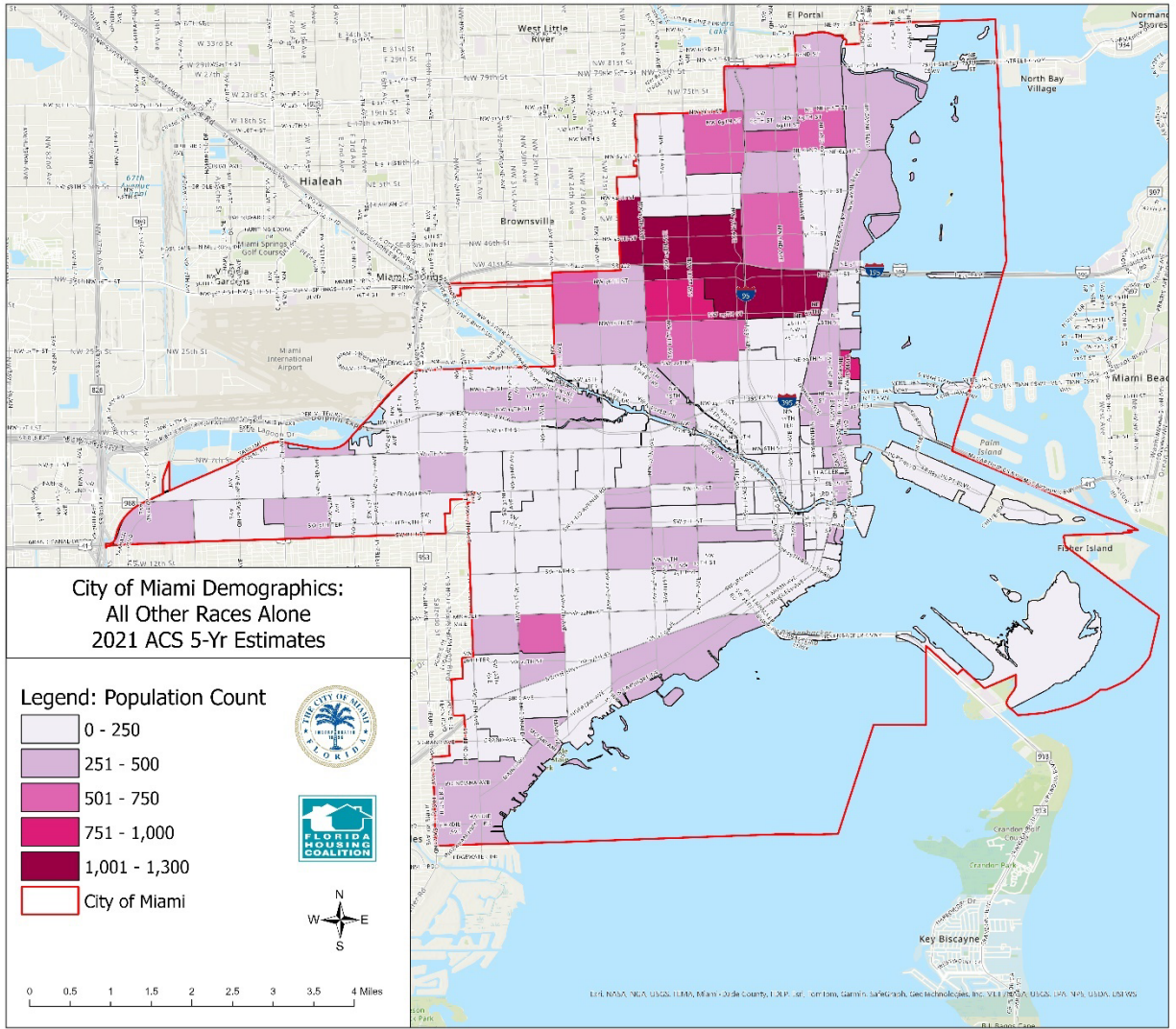
The following maps show the geographic location of races and of the Hispanic/Latino population by Census Tract in the City of Miami. These maps show population share in each Census Tract by the number of individuals residing within that Tract rather than the percentage of individuals of that race/ethnicity residing in that Census Tract. The “All Other Races Alone” map includes the Non-Black Minority races recorded in the Census, including American Indian/Alaska Native Alone, Asian Alone, Native Hawaiian/Pacific Islander Alone, and Other, Non-Hispanic Alone.



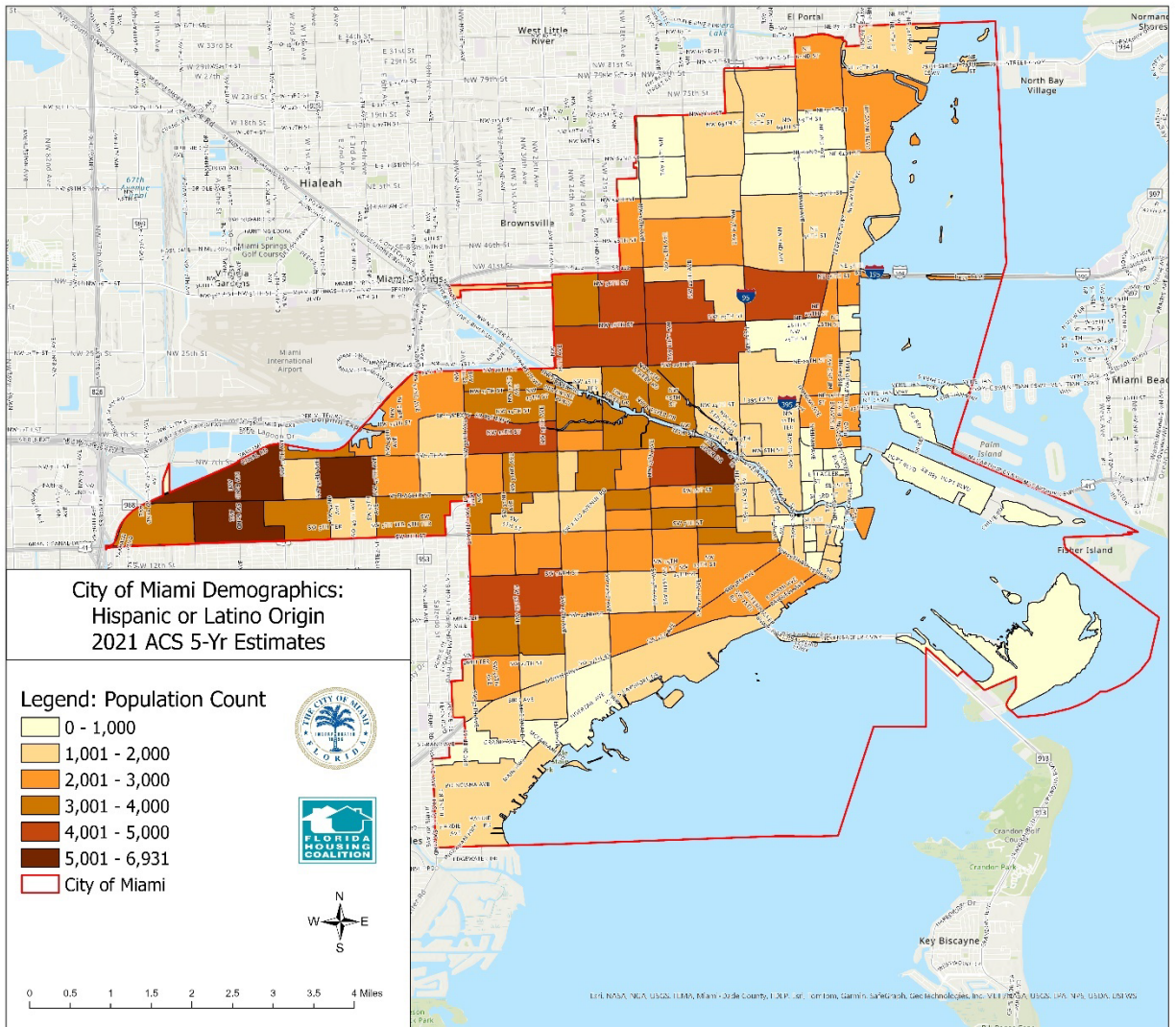
Source: Florida Housing Coalition, utilizing Census TIGER/Line with Selected Demographic and Economic Data, 2017-2021 Detailed Tables.



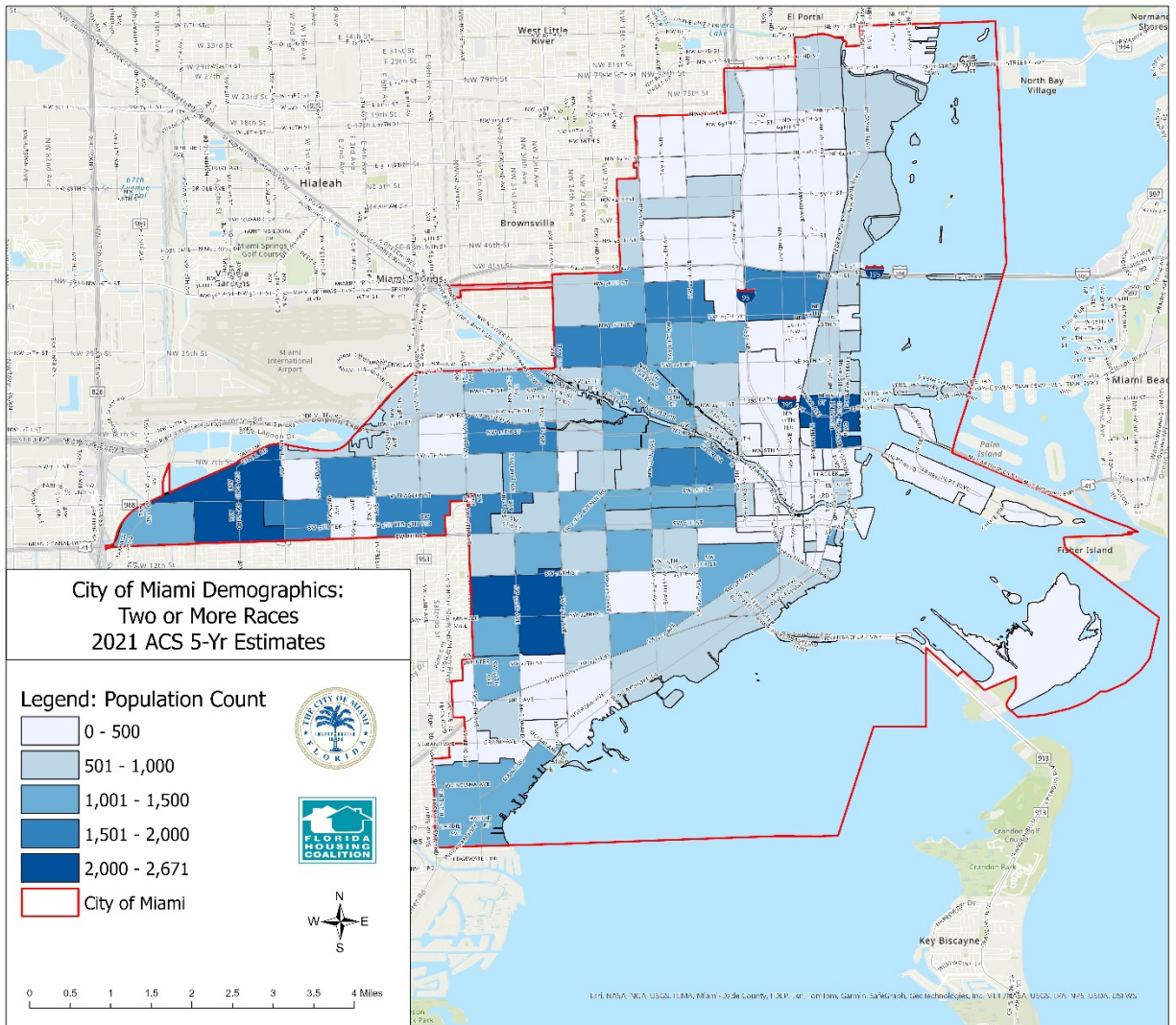
Source: Florida Housing Coalition, utilizing Census TIGER/Line with Selected Demographic and Economic Data, 2017-2021 Detailed Tables.



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Source: Florida Housing Coalition, utilizing Census TIGER/Line with Selected Demographic and Economic Data, 2017-2021 Detailed Tables.

Limited English Proficiency

Over the last decade, individuals who speak English less than “very well” have decreased in the City of Miami, from 45.7% in 2010 to 38.7% in 2022. Overall, the percent of individuals who speak English less than “very well,” regardless of their citizenship status, have decreased, including those who are Foreign-Born, Not U.S. Citizen individuals, which has gone down from 75.1% to 66.4% of individuals who speak English less than “very well.” Meanwhile, the number of native individuals who speak a language other than English has increased from 47.5% to 52.4%.

Looking at Limited English Proficiency by age, language, and proficiency level reveals that Spanish is by far the top language spoken, with over half of the Spanish-speaking population, 52.2%, speaking English less than “very well.”

**City of Miami Limited English Proficiency by Native or Foreign-Born Status
2010 to 2022 Comparison**

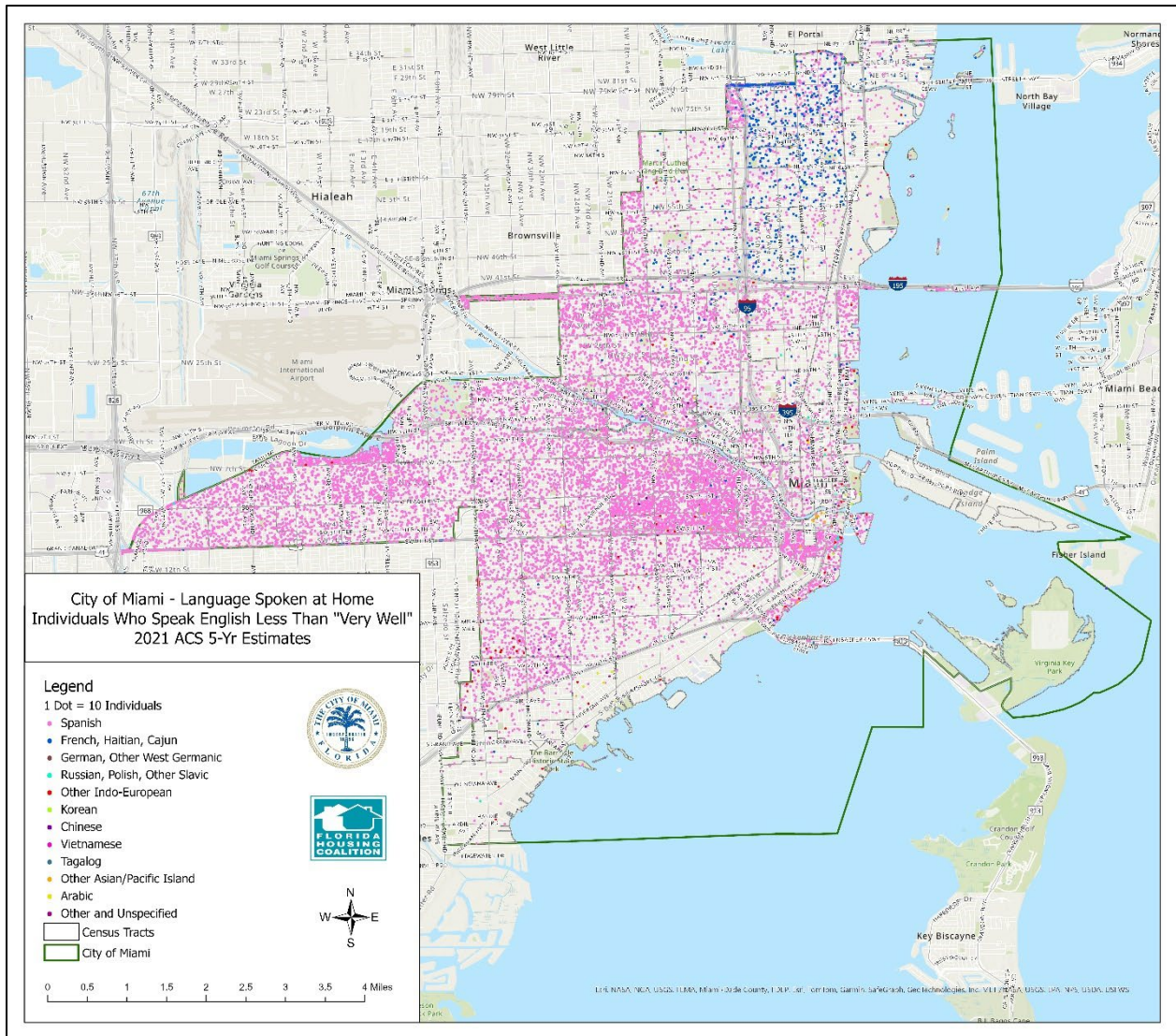
	Total Population	Native	Foreign-Born	Foreign-Born Naturalized	Foreign-Born Not U.S. Citizen
2010					
Population estimate, # 5-years and over	367,139	140,592	226,547	93,527	133,020
% Speak English only	22.7%	52.5%	4.3%	5.0%	3.7%
% Speak language other than English	77.3%	47.5%	95.7%	95.0%	96.3%
% Speak English less than "very well"	45.7%	6.7%	69.9%	62.5%	75.1%
2022					
Population estimate, # 5-years and over	419,095	164,059	255,036	130,401	124,635
% Speak English only	22.2%	47.6%	5.9%	6.7%	5.1%
% Speak language other than English	77.8%	52.4%	94.1%	93.3%	94.9%
% Speak English less than "very well"	38.7%	5.6%	60.0%	53.8%	66.4%

Source: Selected Characteristics of the Native and Foreign-Born Populations, 2022: ACS 5-Year Estimates Table S0501; and 2010: ACS 5-Year Estimates Table S0501.

City of Miami Limited English Proficiency by Age, Language, and Proficiency Level, 2022

	Total Population		Speak English Only or "Very Well"		Speak English Less than "Very Well"	
	#	%	#	%	#	%
Spanish	293,542	70.0%	140,242	47.8%	153,300	52.2%
5 to 17 years old	32,808	7.8%	27,872	85.0%	4,936	15.0%
18 to 64 years old	205,631	49.1%	101,945	49.6%	103,686	50.4%
65+ years old	55,103	13.1%	10,425	18.9%	44,678	81.1%
Other Indo-European languages	26,916	6.4%	19,216	71.4%	7,700	28.6%
5 to 17 years old	3,658	0.9%	3,204	87.6%	454	12.4%
18 to 64 years old	18,831	4.5%	13,941	74.0%	4,890	26.0%
65+ years old	4,427	1.1%	2,071	46.8%	2,356	53.2%
Asian and Pacific Island languages	3,185	0.8%	2,319	72.8%	866	27.2%
5 to 17 years old	273	0.1%	184	67.4%	89	32.6%
18 to 64 years old	2,755	0.7%	2,099	76.2%	656	23.8%
65+ years old	157	0.0%	36	22.9%	121	77.1%
Other languages	2,267	0.5%	1,992	87.9%	275	12.1%
5 to 17 years old	60	0.0%	60	100.0%	0	0.0%
18 to 64 years old	2,095	0.5%	1,899	90.6%	196	9.4%
65+ years old	112	0.0%	33	29.5%	79	70.5%

Source: Language Spoken at Home, 2022: ACS 5-Year Estimates Table S1601.

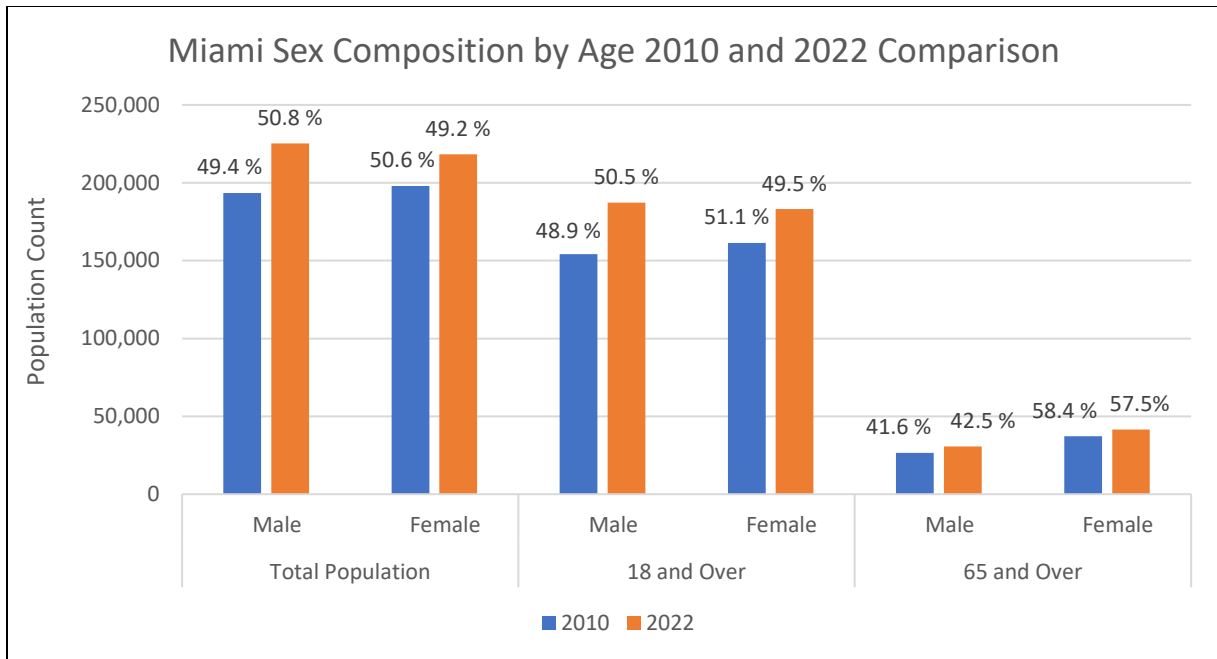


Source: Florida Housing Coalition, utilizing Census TIGER/Line with Selected Demographic and Economic Data, 2017-2021 Detailed Tables.

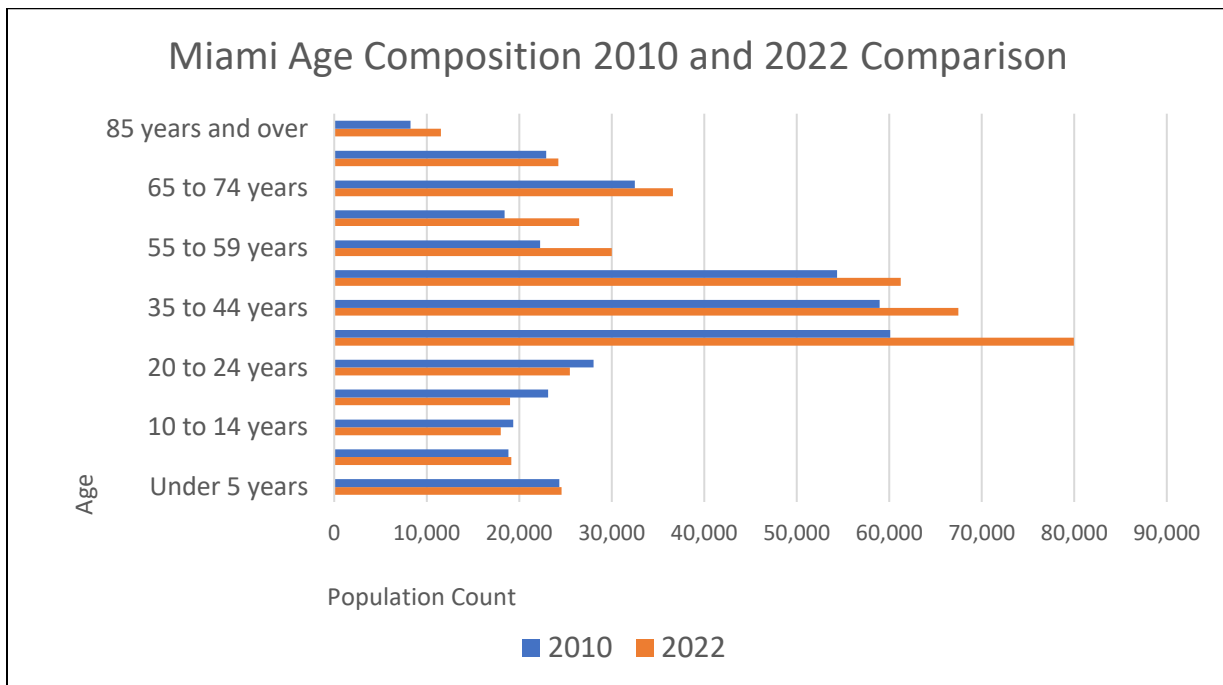
Sex and Age

The dominant sex in the City of Miami was female in 2010 by a small margin, and male in 2022, also by a small margin. The same proportion of sexes is reflected in individuals aged 18+, but there are significantly more females than males that are aged 65+ in both 2010 and 2022.

Looking at age alone reveals that there were more individuals aged 24 and under in 2010 than there were in 2022, and significantly more individuals aged 25 and up in 2022 than there were in 2010 – not just in total number, which increased over the decade as the population as a whole increased, but in terms of the proportion of the total population. This age shift in Miami’s population reflects the national trend of an aging population. Baby boomers are reaching retirement age and fewer children have been born in the last couple of decades.



Source: Demographics and Housing, 2010: ACS 5-Year Estimates Table DP05; Demographics and Housing, 2022: ACS 5-Year Estimates Table DP05



Source: Demographics and Housing, 2010: ACS 5-Year Estimates Table DP05; Demographics and Housing, 2022: ACS 5-Year Estimates Table DP05

Disability

Although the word "disability" can be complex in its definition and application, the ACS uses six questions to determine if a person has a disability. Each question asks if a person has difficulty with a specific action or function. For each of these six questions, there's a table which provides

responses broken down by sex and age group. The following tables provide counts of the population that identifies as experiencing these difficulties.

Miami Population by Disability Type, 2022		
Disability Type	#	%
Hearing difficulty	10,317	2.4%
Vision difficulty	12,757	2.9%
Cognitive difficulty	21,166	5.1%
Ambulatory difficulty	28,507	6.9%
Self-care difficulty	13,017	3.2%
Independent living difficulty	20,876	5.7%

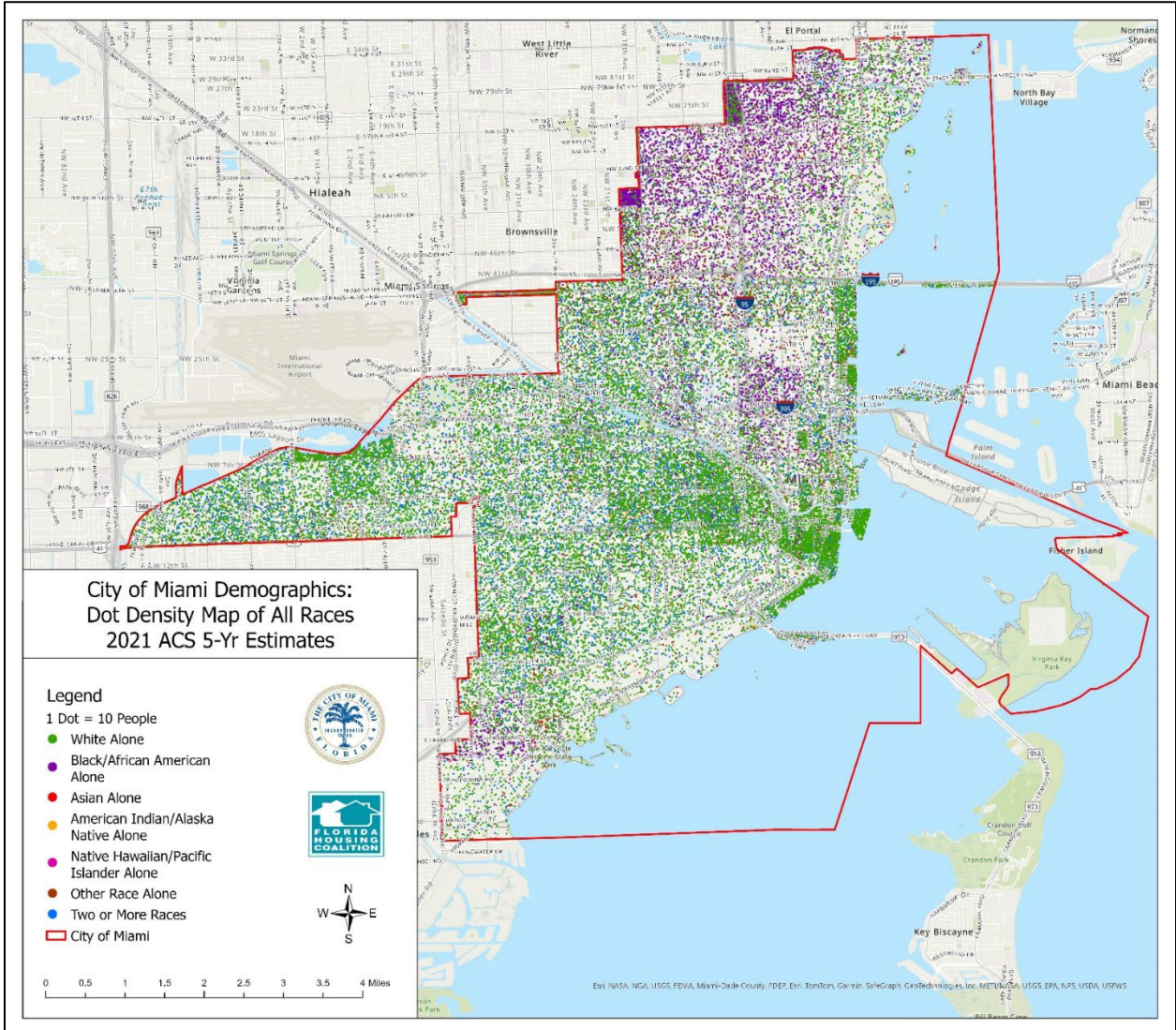
Source: Disability Characteristics, 2022: ACS 5-Year Estimates Table S1810.

SEGREGATION AND INTEGRATION

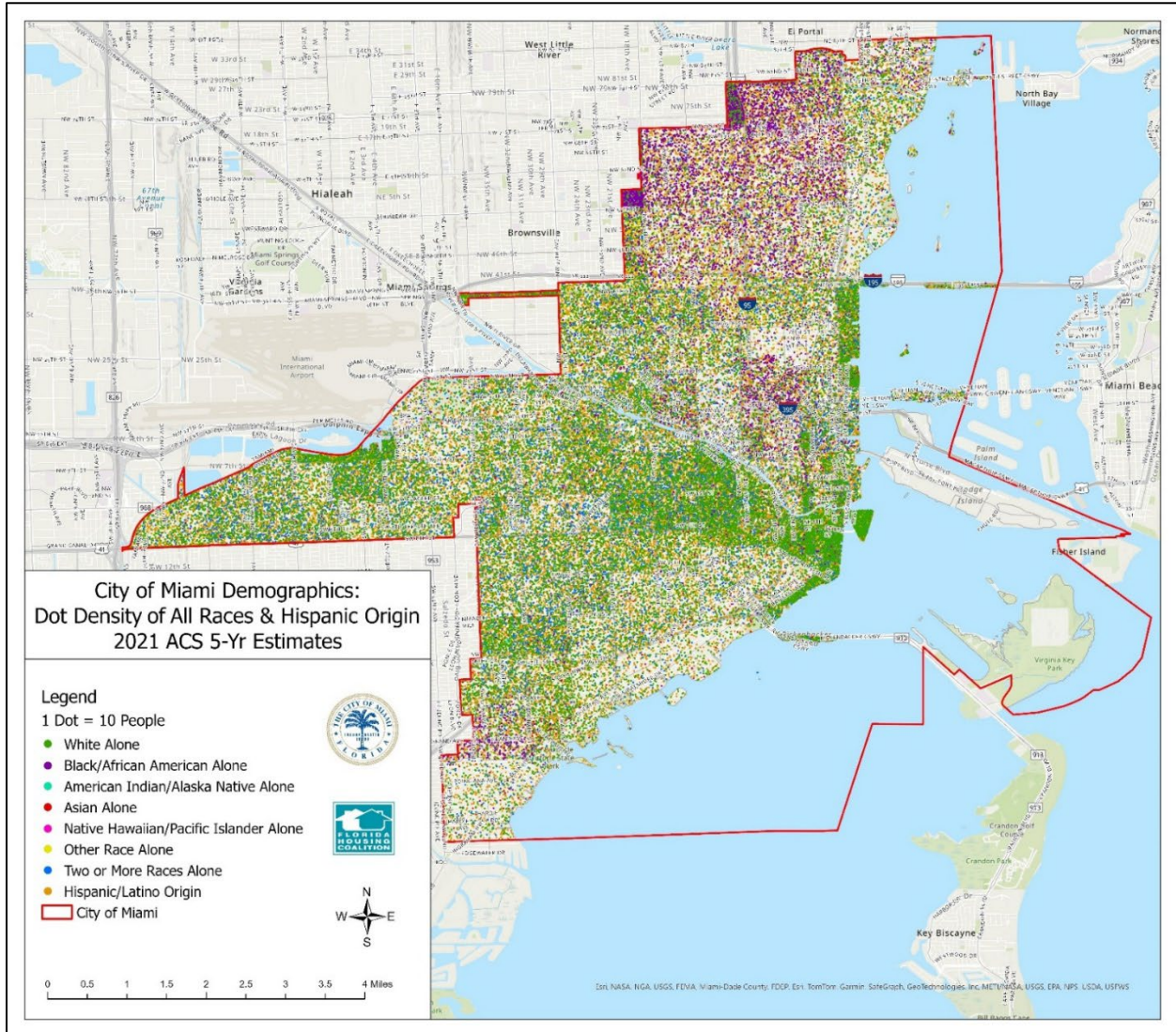
Demographic Segregation

The maps below show the distribution of individuals by race across the City of Miami today, according to Census TIGER/Line with Selected Demographic and Economic Data Detailed Tables, 2017-2021 ACS. In the first map, which uses a dot density mapping methodology, each dot represents approximately 10

individuals residing within that Census Tract. This map shows that patterns of racial segregation for the Black/African American population are nearly identical to the red zoned areas of Miami in the 1930s (HOLC maps below), particularly in the northern part of the city. The Hispanic/Latino population is generally evenly dispersed across the city, as shown in the next map.



Source: Produced by Florida Housing Coalition, utilizing Census TIGER/Line with Selected Demographic and Economic Data, 2017-2021 Detailed Tables.



Housing Segregation

Though access to affordable housing opportunities changes over time, current concentrations of Black residents, poverty, and health and wellness indicators today align very closely with the Homeowners Loan Corporation (HOLC) redlined neighborhoods of the 1930s. Redlined neighborhoods in north-west and north-central Miami are where many of the R/ECAP areas are located, as demonstrated below in the comparisons of Miami’s redlined zone maps and R/ECAPs map. Research also shows that the Overtown neighborhood has experienced segregation and has historically been racially concentrated by Miami’s Black residents. Today, the Overtown neighborhood, in tract 31.00 with a Black population of 77.47%, is still considered a racially and ethnically concentrated area of poverty (R/ECAP).

In 1937, Liberty Square was the first public housing development (affordable housing) in the southern United States to house Black residents. Liberty Square is located in a R/ECAP, census

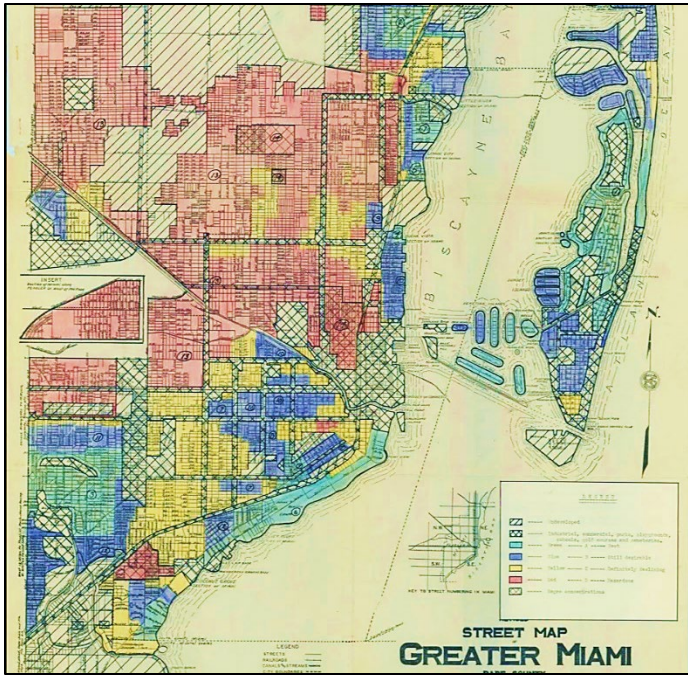
tract 15.01, and is still 88.32% Black. History also shows that in the 1950s, the discriminatory practice of “block busting” gave way for developers and residents to essentially take over historically Black neighborhoods, exacerbating segregation, stunting opportunities for Black homeownership, and reducing access to affordable housing. These discriminatory practices still exist today in the form of gentrification, which is essentially reverse blockbusting.

In 1953, the Scott-Carver Projects were developed and was one of the largest public housing communities in Florida with 850 units. In 1999, the HOPE VI program brought funding in to demolish these units due to deterioration resulting in 1,129 families being displaced. These families were provided Section 8 vouchers to assist with relocation which comes with its own set of challenges. The neighborhood was redeveloped into the Northpark at Scott-Carver development which opened in 2012 and includes 354 mixed-income apartments and townhomes. This development is located in a R/ECAP, Census Tract 10.04 which has a population that is 80.99% Black today.

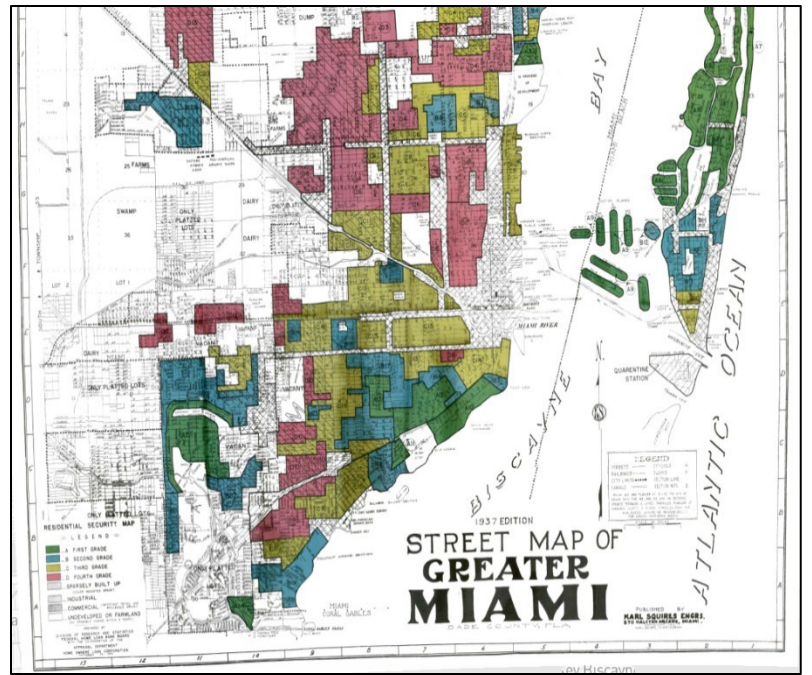
In the 1960s, the construction of I-95 facilitated White suburban out-migration from the inner urban areas while strengthening connection points in outer neighborhoods and the central business district. I-95 was built through Overtown, further suppressing revitalization of that area.

Between 1959 and 1974, over a million Cubans immigrated to the U.S., with half of them settling in Miami. The Cuban Refugee Program provided nearly \$1 million in resettlement funds, relief checks, health care, job training, adult education, and surplus food to Cubans who largely settled in Little Havana. Haitian immigrants arrived in the 1970s and '80s and received far less federal assistance than the earlier Cuban immigrants. They settled largely in Little Haiti. Little Haiti is located within a R/ECAP, Census Tract 20.01, and a central section of Little Havana is the southern-most R/ECAP in Miami, Census Tract 53.02. Little Haiti has been subject to gentrification in part due to its proximity to the popular Wynwood District, while Little Havana has seen gentrification in part due to its proximity to downtown Miami and the Brickell neighborhood.

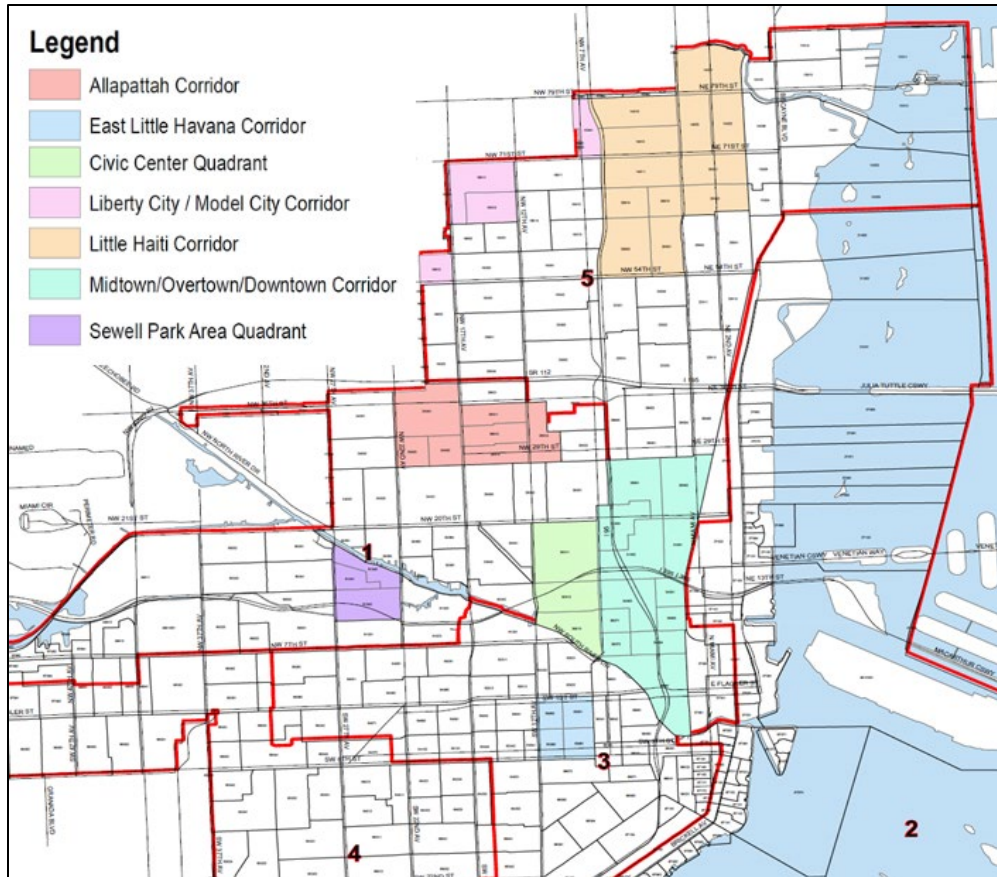
HOLC Greater Miami Redline Map, 1934



HOLC Greater Miami Redline Map, 1937

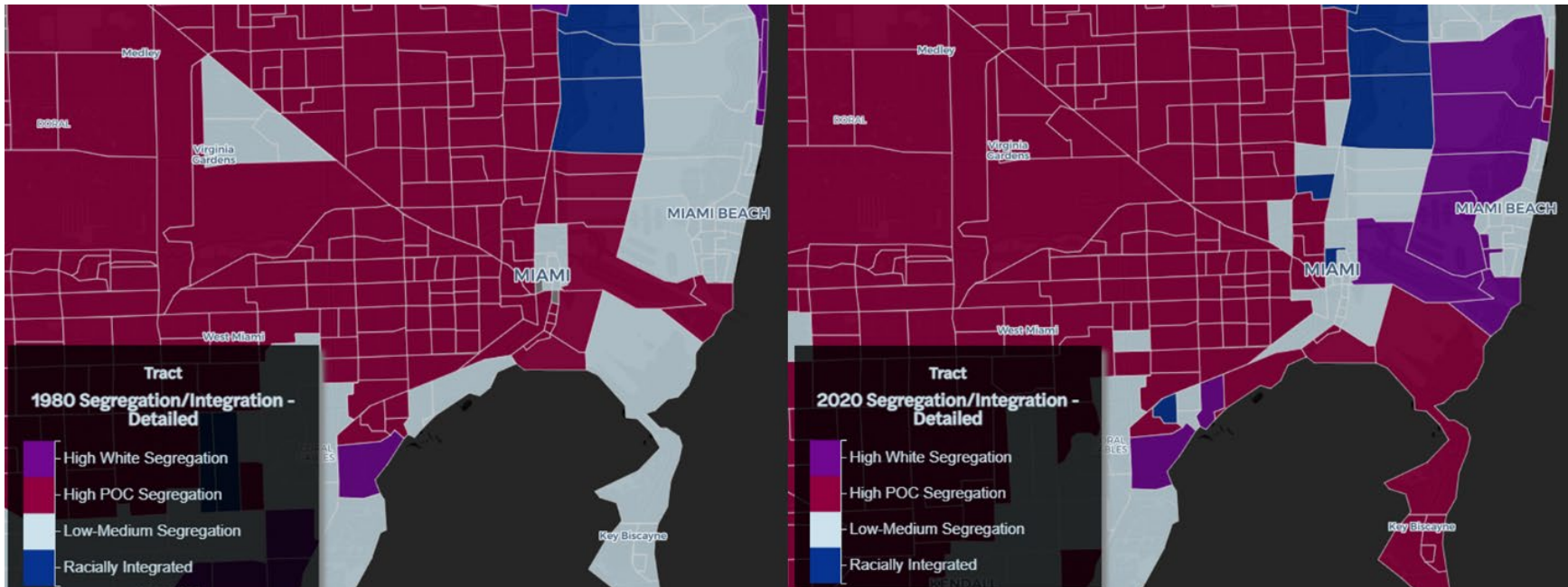


Miami R/ECAP Map



Segregation/Integration Measures

According to an extensive study by the Other & Belonging Institute at UC Berkeley, the Miami-Fort Lauderdale-Pompano Beach, FL MSA is within the top 10 metro areas with the greatest decrease in segregation between 1990 and 2019. Low-Medium Segregation areas and Racially Integrated areas spread between these decades and is reflected in the maps above. This is likely due in part to the disbursement of Hispanic/Latino populations throughout the city. Despite this shift, Miami-Fort Lauderdale-Pompano Beach was also ranked as one of the top 10 most segregated MSAs in the U.S. in 2019.

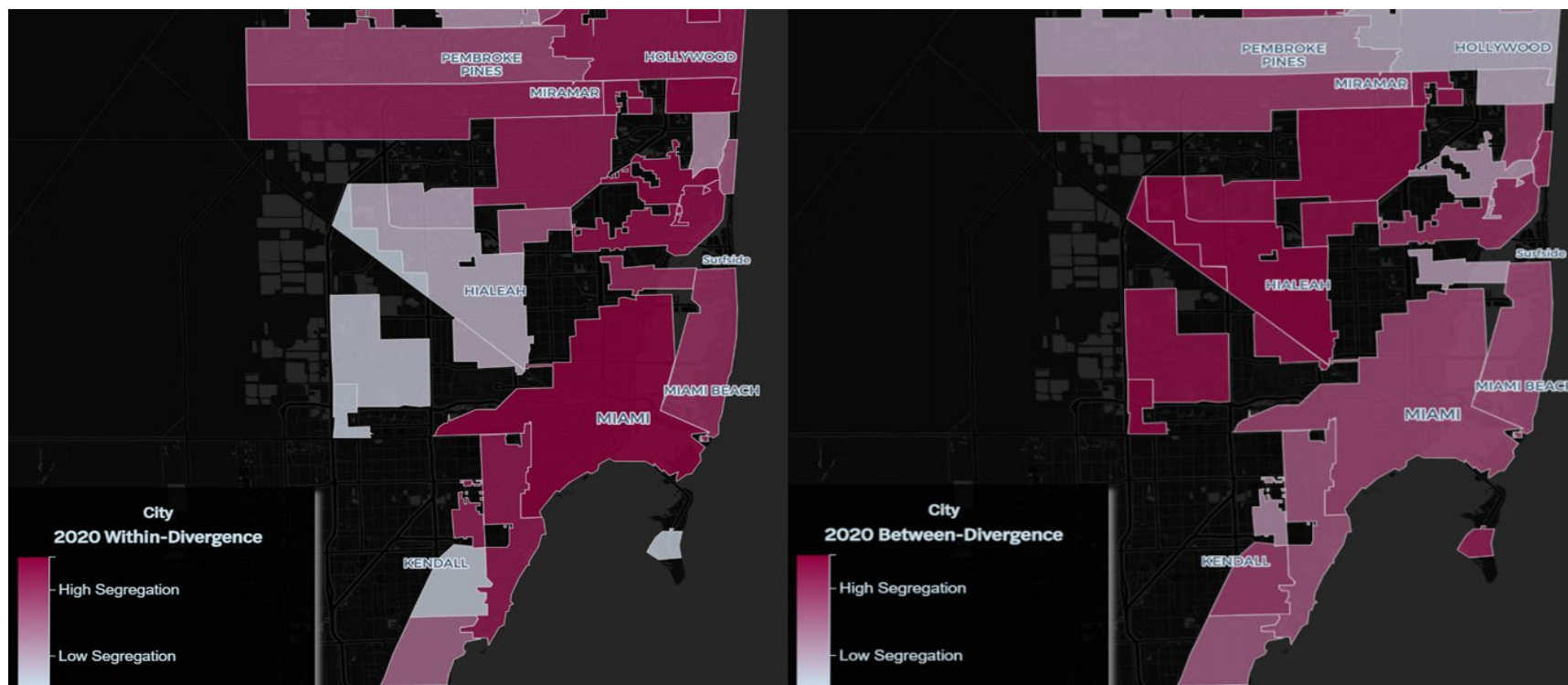


Source: Other & Belonging Institute, The Roots of Structural Racism Project, interactive mapping tool, 2021

Divergence Index

The “Divergence Index” compares the racial composition of a smaller geography to a larger geography. “Within-Divergence” is the level of neighborhood segregation within a specific geography like a city. In this case, it is the difference between a neighborhood and the neighborhoods surrounding it within Miami city limits. Between-Divergence is the difference between segregation within a city and the surrounding region. In this case, it is the difference between the City of Miami and the Miami-Fort Lauderdale-Pompano Beach MSA.

The following maps show Miami’s Within-Divergence and Between-Divergence scores. A simple interpretation of these maps indicates that Miami neighborhoods are less similar and more segregated in their racial composition when compared to each other, while the city as a whole is more similar to surrounding cities in the Miami-Fort Lauderdale-Pompano Beach MSA.



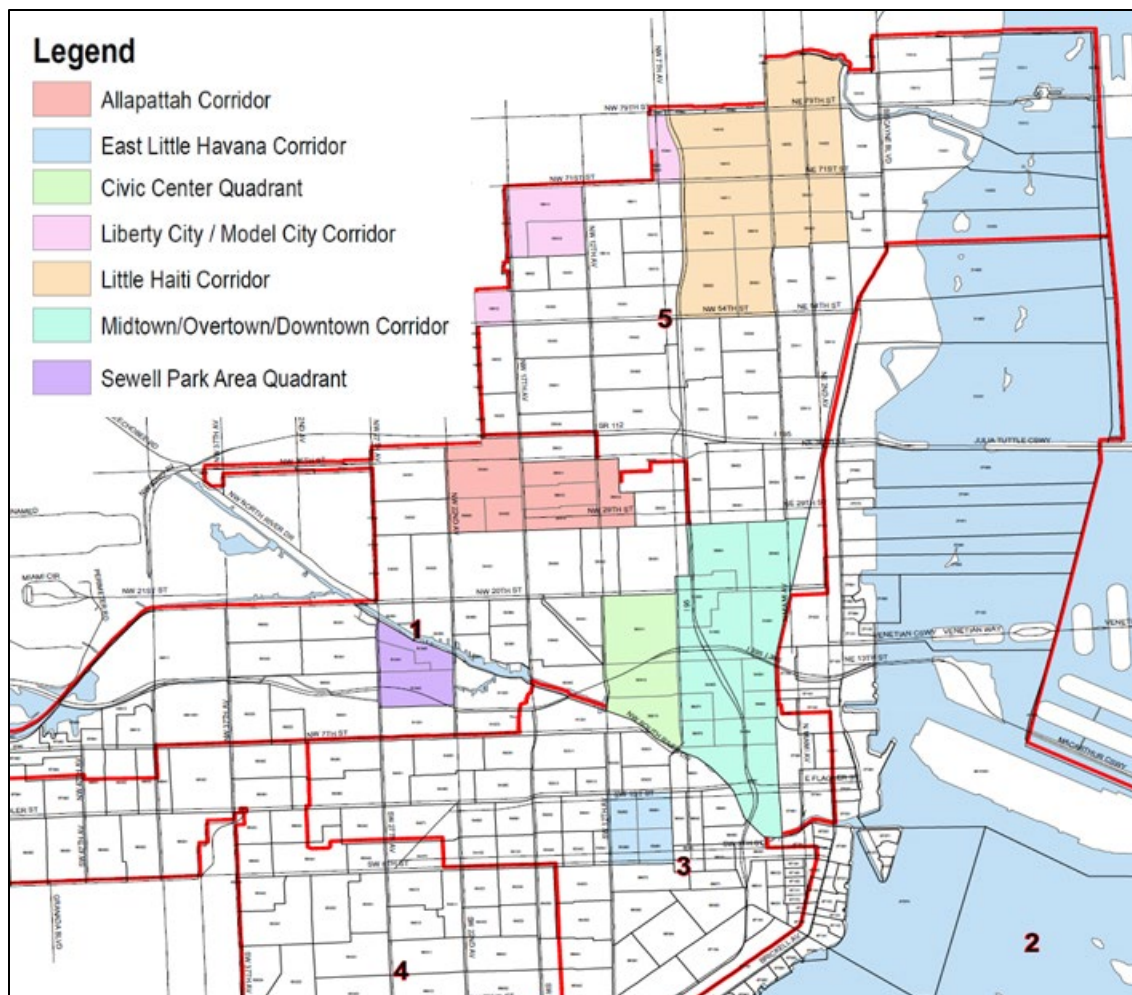
Source: Other & Belonging Institute, The Roots of Structural Racism Project, interactive mapping tool, 2021

RACIALLY/ETHNICALLY CONCENTRATED AREAS OF POVERTY (R/ECAPS)

The AFFH rule defines a racially or ethnically concentrated area of poverty (R/ECAP) as a geographic area with significant concentrations of poverty and minority concentrations. HUD uses two criteria to determine whether a census tract is a R/ECAP. First, there must be a racial/ethnic concentration with a non-White population making up 50% or more of the area. Second, the poverty level of the neighborhood must either exceed a 40% poverty rate or be three times the average tract poverty rate for its corresponding metropolitan/micropolitan area, whichever threshold is lower. HUD-provided maps show census tracts that meet the criteria for R/ECAPs.

Based on the federal definition, the City of Miami has 16 R/ECAPs comprised of 18 census tracts. For data analysis purposes, the city's R/ECAP areas have been categorized into 7 corridors or quadrants.

R/ECAP Map and District Overlay



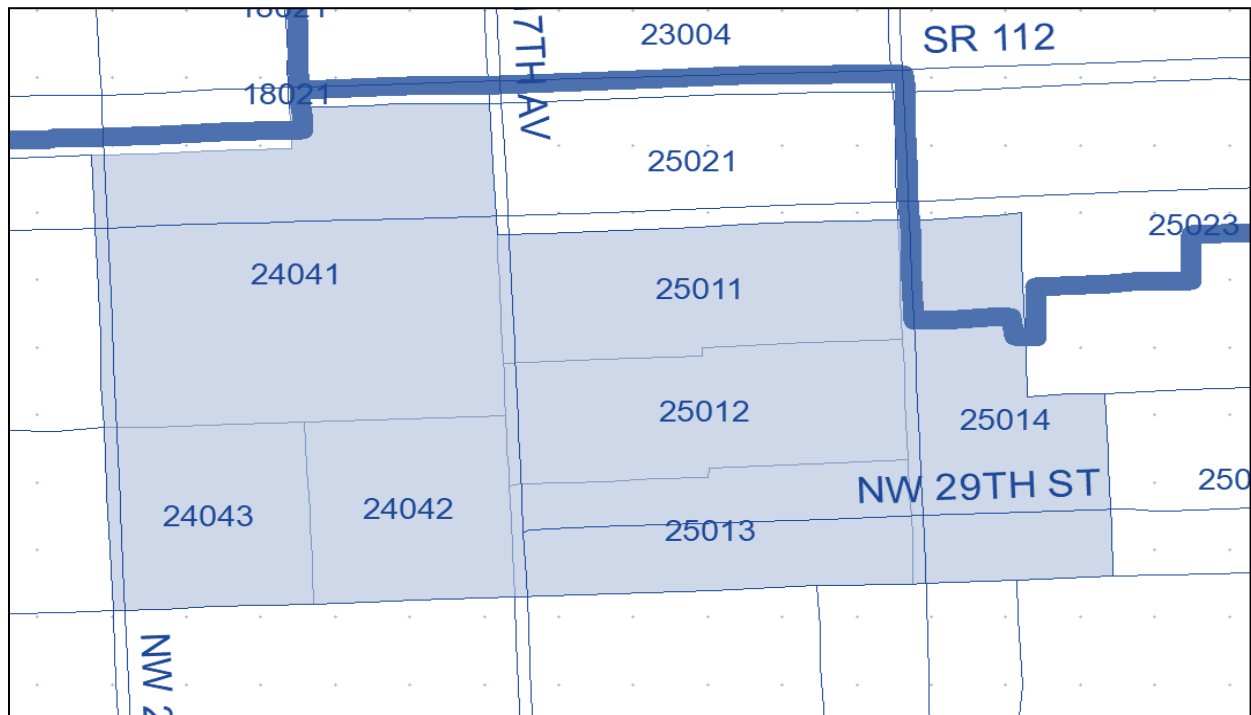
R/ECAP Boundaries and Demographics

City Commission District 1

Allapattah Corridor

The Allapattah Corridor includes census tracts 24.04 and 25.01. The Allapattah Corridor is bordered by the Airport Expressway and NW 36th Street to the north, NW 28th Street to the south, NW 10th Avenue to the east, and NW 22nd Avenue to the west.

The total population for this corridor of R/ECAPs is 11,469 which is primarily represented by individuals identifying as Hispanic ethnicity (of any race) at 89%. The homes in the R/ECAP area are primarily renter occupied. Fifty percent of households in census tract 25.01 are experiencing cost burden (paying more than 30% for housing costs) and 59% of households in census tract 24.04 are cost burdened. An average of 33% of individuals in this R/ECAP corridor are living below the poverty level with 41% of those individuals residing in census tract 24.04.



Source: ACS Five-Year Estimates 2017-2021 (Tables DP03, DP05, S1101)

Census Tract 25.01					
Demographics					
Total Population	White	Black	Other	Two or More	Hispanic
5,932	2,369	729	958	1,876	5,118
Households					
Total	Owner		Renter		
1,845	32%		68%		
Economic					
Median Household Income	Individuals Living Below the Poverty Level	Unemployment Rate	Cost Burdened Households (paying more 30%)		
\$32,635	24%	11.7%	50%		

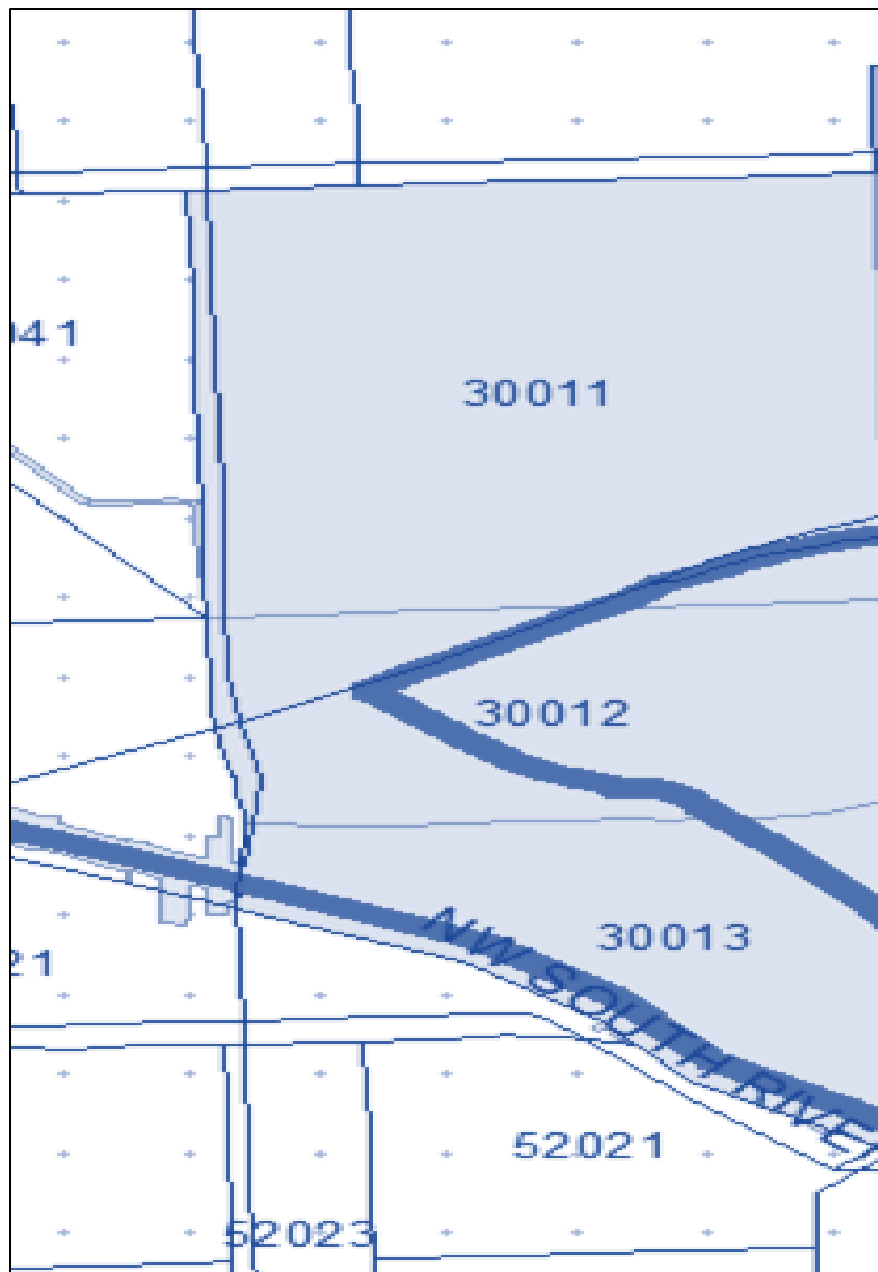
Census Tract 24.04					
Demographics					
Total Population	White	Black	Other	Two or More	Hispanic
5,537	3,337	569	310	1,284	5,070
Households					
Total	Owner		Renter		
2,451	13%		87%		
Economic					
Median Household Income	Individuals Living Below the Poverty Level	Unemployment Rate	Cost Burdened Households (paying more 30%)		
\$16,515	41%	8.2%	59%		

Source: ACS Five-Year Estimates 2017-2021 (Tables DP03, DP05, S1101)

Civic Center Quadrant

The Civic Center Quadrant R/ECAP includes census tract 30.01. The Civic Center Quadrant is bordered by NW 20th Street to the north, the Miami River and NW South River Drive to the south, NW 7th Avenue to the east, and NW 12th Avenue to the west.

The total population for this quadrant is 3,001 which is primarily represented by individuals identifying as Hispanic ethnicity at 69%. The homes in the R/ECAP area are primarily renter occupied. Sixty percent of households in census tract 30.01 are experiencing cost burden (paying more than 30% for housing costs). An average of 43% of individuals in this R/ECAP quadrant are living below the poverty level.



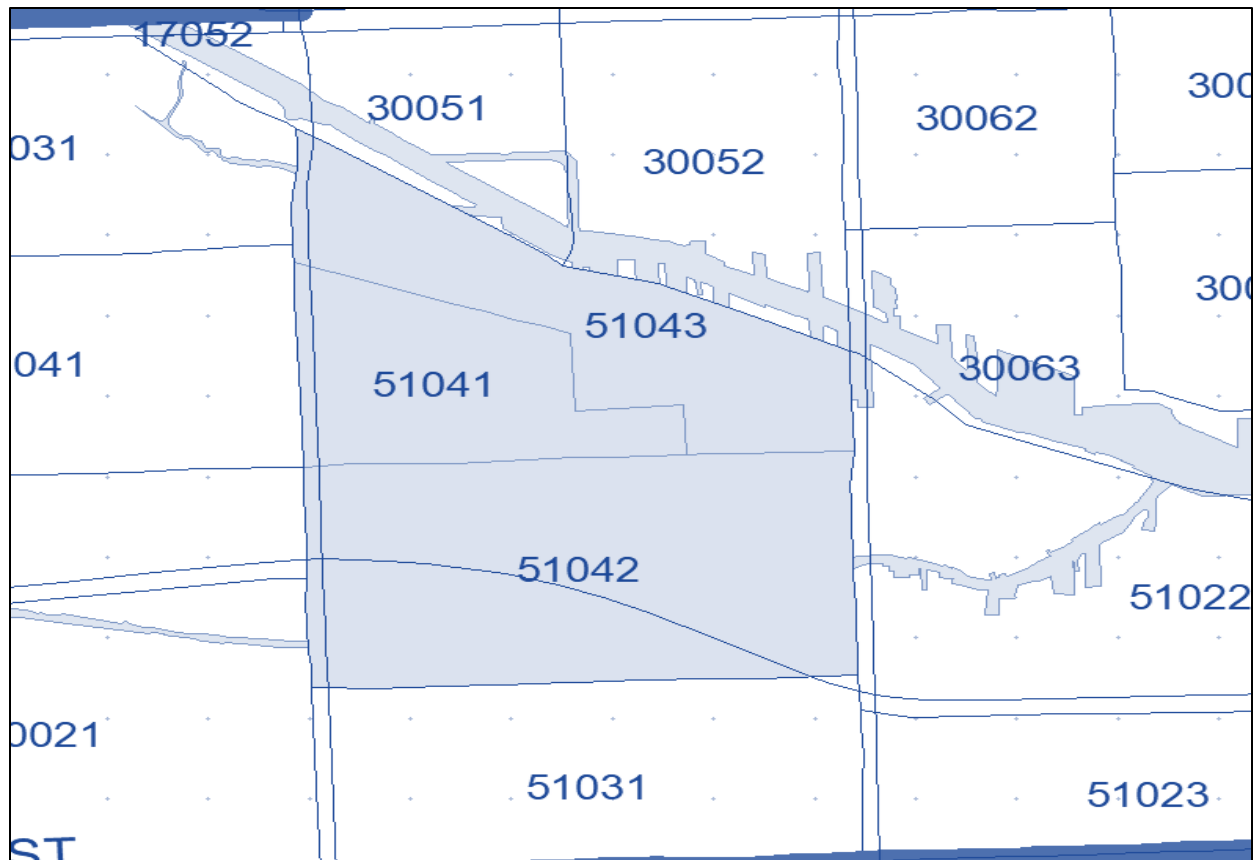
Census Tract 30.01					
Demographics					
Total Population	White	Black	Other	Two or More	Hispanic
3,001	1,550	438	12	870	2,067
Households					
Total	Owner		Renter		
1,430	21%		79%		
Economic					
Median Household Income	Individuals Living Below the Poverty Level	Unemployment Rate	Cost Burdened Households (paying more 30%)		
\$24,828	43%	4.8%	60%		

Source: ACS Five-Year Estimates 2017-2021 (Tables DP03, DP05, S1101)

Sewell Park (North) Quadrant

The Sewell Park (North) Quadrant includes census tract 51.04. This quadrant is bordered by the North Fork Miami River and NE 16th Street Road to the north, NW 11th Street to the south, NW 22nd Avenue to the east, and Unity Boulevard/Florida State Road 9 to the west.

The total population for this quadrant is 4,223 which is primarily represented by individuals identifying as Hispanic ethnicity at 87%. The homes in the R/ECAP area are primarily renter occupied. Fifty-eight percent of households in census tract 51.04 are experiencing cost burden (paying more than 30% for housing costs). An average of 35% of individuals in this R/ECAP quadrant are living below the poverty level.



Census Tract 51.04					
Demographics					
Total Population	White	Black	Other	Two or More	Hispanic
4,223	2,440	461	389	933	3,661
Households					
Total	Owner		Renter		
1,824	16%		84%		
Economic					
Median Household Income	Individuals Living Below the Poverty Level	Unemployment Rate	Cost Burdened Households (paying more 30%)		
\$29,886	35%	1%	58%		

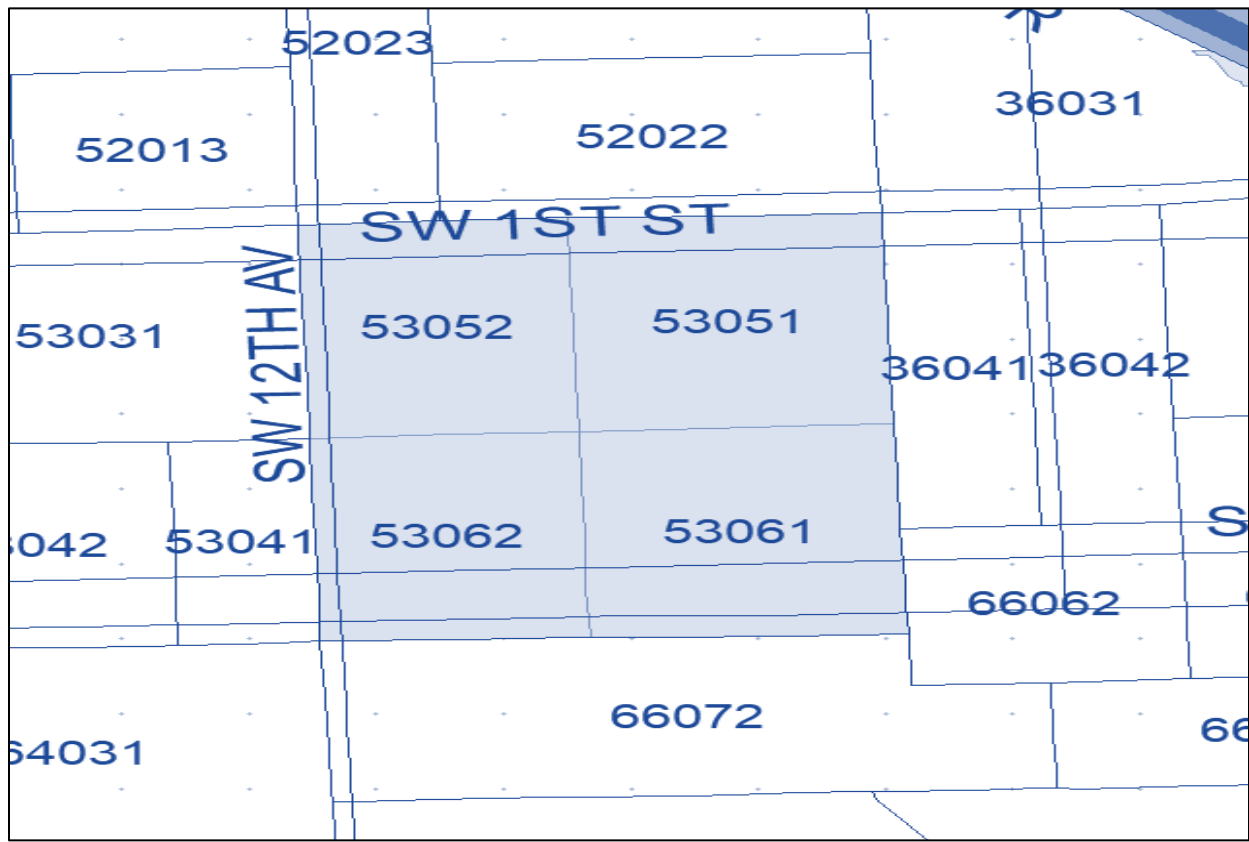
Source: ACS Five-Year Estimates 2017-2021 (Tables DP03, DP05, S1101)

City Commission District 3

East Little Havana Corridor

The East Little Havana Corridor includes census tracts 53.05 and 53.06. This corridor is bordered by W. Flagler Street/Florida State Road 968 to the north, Florida State Road 90/U.S. Route 41 to the south, SW 8th Avenue to the east, and SW 12th Avenue to the west.

The total population for this corridor of R/ECAPs is 8,494 which is primarily represented by individuals identifying as Hispanic ethnicity (of any race) at 92%. The homes in the R/ECAP area are majority renter occupied at 98%. Sixty-four percent of households in census tract 53.05 are experiencing cost burden (paying more than 30% for housing costs) and 76% experience cost burden in census tract 53.06. An average of 30% of individuals in this R/ECAP corridor are living below the poverty level.



Census Tract 53.05					
Demographics					
Total Population	White	Black	Other	Two or More	Hispanic
4,155	2,652	97	156	1,082	3,826
Households					
Total	Owner		Renter		
1,912	2%		98%		
Economic					
Median Household Income	Individuals Living Below the Poverty Level	Unemployment Rate	Cost Burdened Households (paying more 30%)		
\$31,199	30%	6.8%	64%		

Source: ACS Five-Year Estimates 2017-2021 (Tables DP03, DP05, S1101)

Census Tract 53.06					
Demographics					
Total Population	White	Black	Other	Two or More	Hispanic
4,339	2,424	206	246	1,463	3,991
Households					
Total	Owner		Renter		
2,013	2%		98%		
Economic					
Median Household Income	Individuals Living Below the Poverty Level	Unemployment Rate	Cost Burdened Households (paying more 30%)		
-	30%	3.7%	76%		

Source: ACS Five-Year Estimates 2017-2021 (Tables DP03, DP05, S1101)

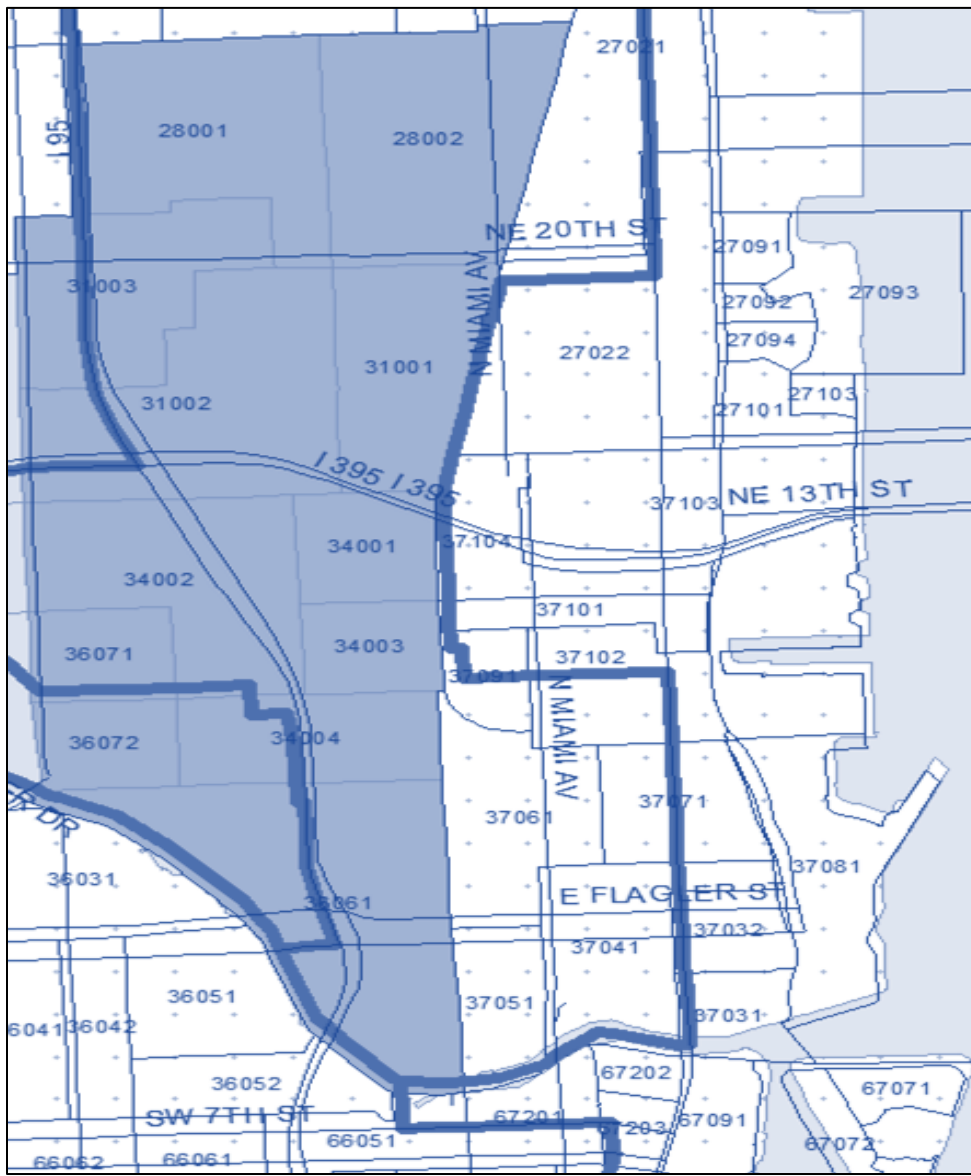
City Commission District 5

Midtown/Overtown/Downtown Corridor

The Midtown/Overtown/Downtown Corridor includes census tracts 28, 31, 34, 36.06, and 36.07. This corridor is bordered by NW 28th Street to the north, down to the Miami River below SW 3rd

Street to the south, Arena Blvd./NW 1st Avenue/SW 1st Avenue/Riverfront Aly to the east, and I-95 and NW 7th Avenue to the west.

The total population for this corridor of R/ECAPs is 13,729 which is primarily Black in census tracts 28, 31, and 34 at 61% and White in census tracts 36.06 and 36.07 at 56%. All tracts within the R/ECAP corridor also have a large representation of individuals identifying as Hispanic ethnicity (of any race) at 50%. The homes in the R/ECAP areas are primarily renter occupied. Fifty percent of households within the R/ECAP corridor are experiencing cost burden (paying more than 30% for housing costs) across all census tracts. An average of 42% of individuals in the R/ECAP corridor are living below the poverty level. Census tract 28 has the largest percentage of individuals living below the poverty level, within the R/ECAP corridor, at 56%.



Census Tract 28					
Demographics					
Total Population	White	Black	Other	Two or More	Hispanic
1,076	290	421	180	166	605
Households					
Total	Owner		Renter		
401	1%		99%		
Economic					
Median Household Income	Individuals Living Below the Poverty Level	Unemployment Rate	Cost Burdened Households (paying more 30%)		
\$30,701	56%	17.6%	66%		

Source: ACS Five-Year Estimates 2017-2021 (Tables DP03, DP05, S1101)

Census Tract 31					
Demographics					
Total Population	White	Black	Other	Two or More	Hispanic
5,563	1,259	3,851	20	411	1,825
Households					
Total	Owner		Renter		
1,780	12%		88%		
Economic					
Median Household Income	Individuals Living Below the Poverty Level	Unemployment Rate	Cost Burdened Households (paying more 30%)		
\$26,229	48%	27.6%	51%		

Source: ACS Five-Year Estimates 2017-2021 (Tables DP03, DP05, S1101)

Census Tract 34					
Demographics					
Total Population	White	Black	Other	Two or More	Hispanic
3,118	960	1,632	85	382	1,541
Households					
Total	Owner		Renter		
1,522	3%		97%		
Economic					
Median Household Income	Individuals Living Below the Poverty Level	Unemployment Rate	Cost Burdened Households (paying more 30%)		
\$30,875	28%	6.7%	71%		

Source: ACS Five-Year Estimates 2017-2021 (Tables DP03, DP05, S1101)

Census Tract 36.06					
Demographics					
Total Population	White	Black	Other	Two or More	Hispanic
1,938	1,197	137	221	383	1,536
Households					
Total	Owner		Renter		
1,210	0%		100%		
Economic					
Median Household Income	Individuals Living Below the Poverty Level	Unemployment Rate	Cost Burdened Households (paying more 30%)		
\$16,268	40%	6.0%	70%		

Source: ACS Five-Year Estimates 2017-2021 (Tables DP03, DP05, S1101)

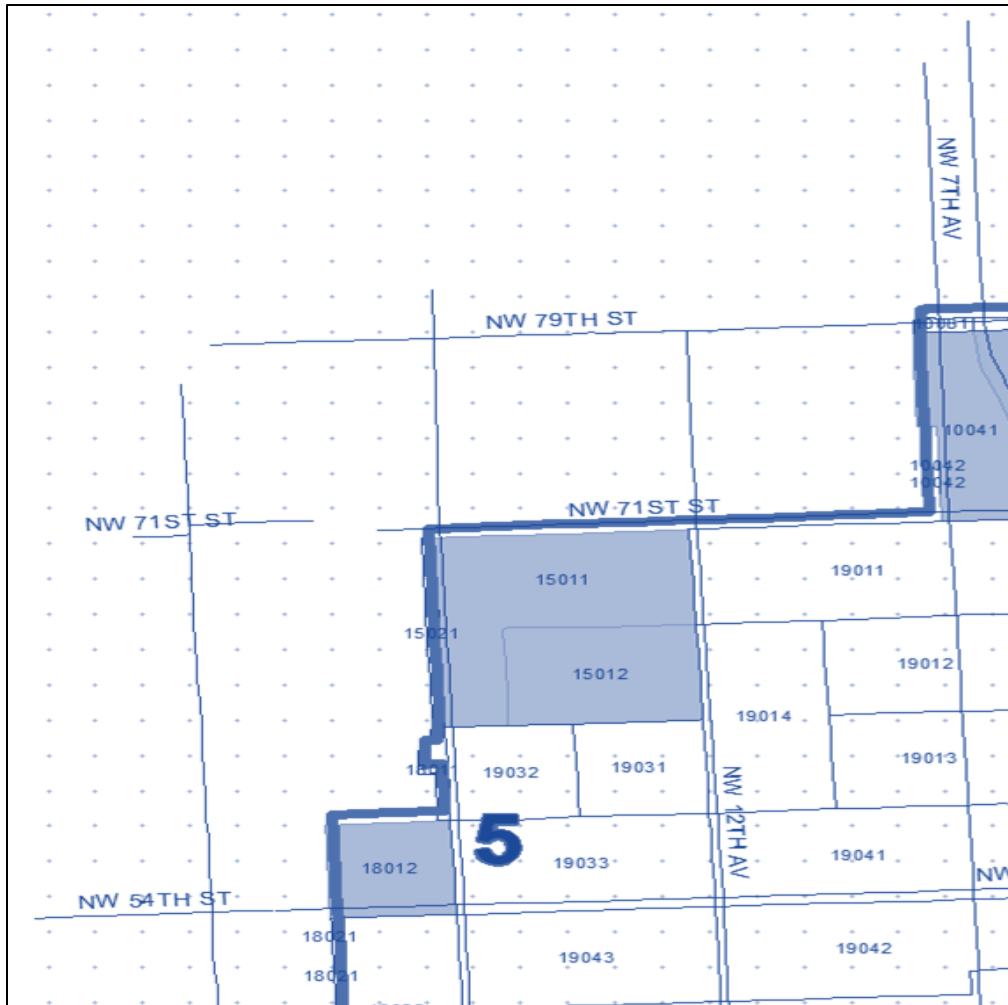
Census Tract 36.07					
Demographics					
Total Population	White	Black	Other	Two or More	Hispanic
2,034	1,022	661	296	100	1,354
Households					
Total	Owner		Renter		
925	8%		92%		
Economic					
Median Household Income	Individuals Living Below the Poverty Level	Unemployment Rate	Cost Burdened Households (paying more 30%)		
\$25,268	40%	11.3%	74%		

Source: ACS Five-Year Estimates 2017-2021 (Tables DP03, DP05, S1101)

Liberty City/Model City Corridor

The Liberty City/Model City Corridor includes census tract 10.04 block group 1, census tract 15.01, and census tract 18.01 block group 2. This R/ECAP corridor is bordered by NW 79th Street to the north, NW 54th Street to the south, I-95 to the east, and NW 19th Avenue to the west.

The total population for this corridor of R/ECAPs is 4,772 which is primarily Black across all census tracts and block groups at 79%. The homes in the R/ECAP areas are primarily renter occupied in tracts 10.04 (BG 1) and 15.01 and primarily owner-occupied in tract 18.01 (BG 2). Forty percent of households in tract 15.01 are experiencing cost burden (paying more than 30% for housing costs). An average of 40% of individuals in the R/ECAP corridor are living below the poverty level. Census tract 18.01 (BG 2) has the largest percentage of individuals living below the poverty level, within the R/ECAP corridor, at 48%.



Census Tract 10.04 Block Group 1					
Demographics					
Total Population	White	Black	Other	Two or More	Hispanic
1,041	23	943	48	9	71
Households					
Total	Owner		Renter		
331	34%		66%		
Economic					
Median Household Income	Individuals Living Below the Poverty Level	Unemployment Rate	Cost Burdened Households (paying more 30%)		
\$42,656	30%	16.7%	-		

Source: ACS Five-Year Estimates 2017-2021 (Tables DP03, DP05, S1101)

Census Tract 15.01					
Demographics					
Total Population	White	Black	Other	Two or More	Hispanic
2,706	140	2,211	0	323	251
Households					
Total	Owner		Renter		
974	27%		73%		
Economic					
Median Household Income	Individuals Living Below the Poverty Level	Unemployment Rate	Cost Burdened Households (paying more 30%)		
\$24,500	45%	21.5%	40%		

Source: ACS Five-Year Estimates 2017-2021 (Tables DP03, DP05, S1101)

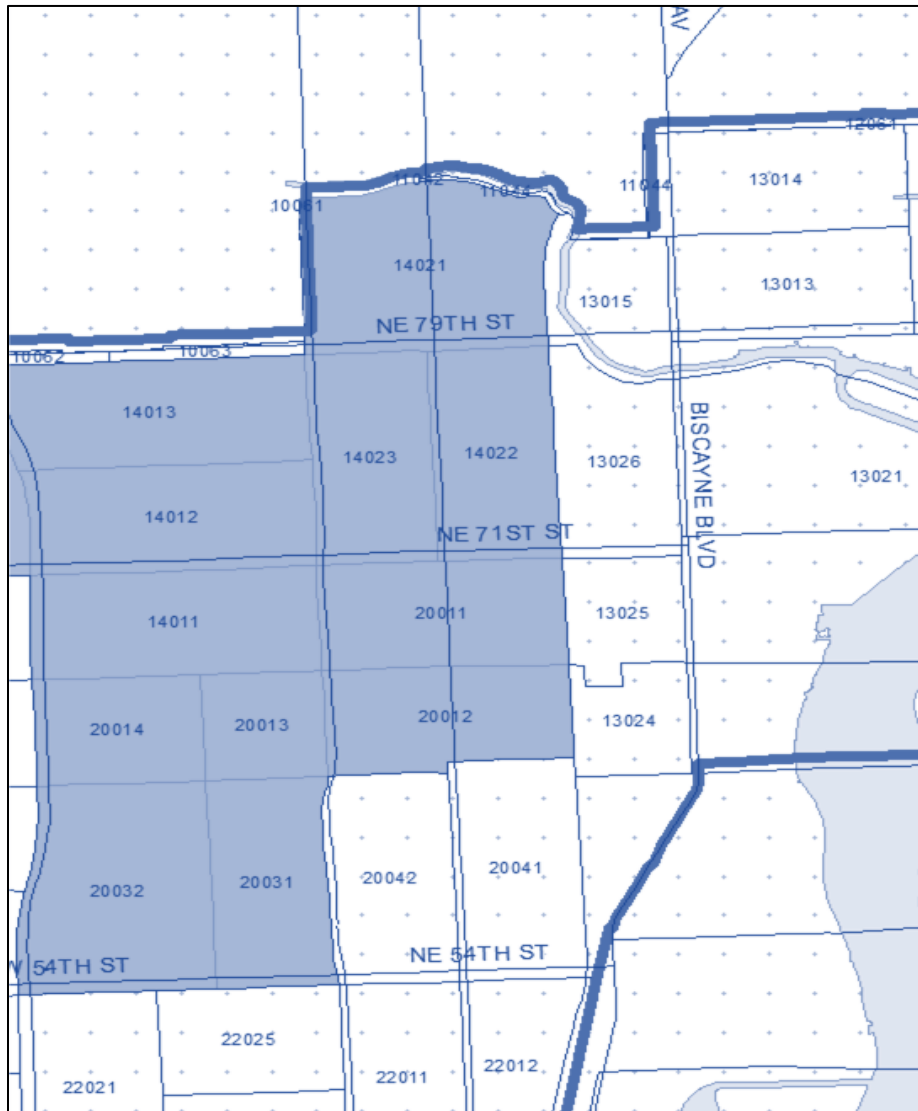
Census Tract 18.01 Block Group 2					
Demographics					
Total Population	White	Black	Other	Two or More	Hispanic
1,025	25	623	5	7	359
Households					
Total	Owner		Renter		
509	70%		30%		
Economic					
Median Household Income	Individuals Living Below the Poverty Level	Unemployment Rate	Cost Burdened Households (paying more 30%)		
\$37,319	48%	15.8%	-		

Source: ACS Five-Year Estimates 2017-2021 (Tables DP03, DP05, S1101)

Little Haiti Corridor

The Little Haiti Corridor includes census tract 14.01, 14.02, 20.01, and 20.03. This R/ECAP corridor is bordered by the Little River Canal just above NE 84th Street to the north, NW 54th Street to the south, NE 4th Court to the east, and I-95 to the west.

The total population for this corridor of R/ECAPs is 20,036 which is primarily Black across all census tracts at 69%. The homes in the R/ECAP areas are primarily renter occupied. Over 50% of households, for nearly all tracts, in the R/ECAP corridor are experiencing cost burden (paying more than 30% for housing costs). An average of 38% of individuals in the R/ECAP corridor are living below the poverty level. Census tract 20.03 has the largest percentage of individuals living below the poverty level, within the R/ECAP corridor, at 50%.



Census Tract 14.01					
Demographics					
Total Population	White	Black	Other	Two or More	Hispanic
6,871	519	5,552	458	342	1,386
Households					
Total	Owner		Renter		
2,132	14%		86%		
Economic					
Median Household Income	Individuals Living Below the Poverty Level	Unemployment Rate	Cost Burdened Households (paying more 30%)		
\$22,287	40%	11.4%	53%		

Source: ACS Five-Year Estimates 2017-2021 (Tables DP03, DP05, S1101)

Census Tract 14.02					
Demographics					
Total Population	White	Black	Other	Two or More	Hispanic
6,320	1,563	3,710	278	769	2,551
Households					
Total	Owner		Renter		
2,443	19%		81%		
Economic					
Median Household Income	Individuals Living Below the Poverty Level	Unemployment Rate	Cost Burdened Households (paying more 30%)		
\$35,559	27%	7.7%	56%		

Source: ACS Five-Year Estimates 2017-2021 (Tables DP03, DP05, S1101)

Census Tract 20.01					
Demographics					
Total Population	White	Black	Other	Two or More	Hispanic
3,884	412	2,829	173	74	671
Households					
Total	Owner		Renter		
1,386	17%		83%		
Economic					
Median Household Income	Individuals Living Below the Poverty Level	Unemployment Rate	Cost Burdened Households (paying more 30%)		
\$22,020	34%	13.2%	49%		

Source: ACS Five-Year Estimates 2017-2021 (Tables DP03, DP05, S1101)

Census Tract 20.03					
Demographics					
Total Population	White	Black	Other	Two or More	Hispanic
2,961	644	1,804	253	260	960
Households					
Total	Owner		Renter		
1,215	16%		84%		
Economic					
Median Household Income	Individuals Living Below the Poverty Level	Unemployment Rate	Cost Burdened Households (paying more 30%)		
\$20,202	50%	19.6%	60%		

Source: ACS Five-Year Estimates 2017-2021 (Tables DP03, DP05, S1101)

ACCESS TO AFFORDABLE HOUSING OPPORTUNITIES

Introduction

Access to affordable housing provides stability which promotes economic self-sufficiency and upward mobility. By improving the quality of life for residents, affordable housing is the pathway to better health, adequate employment, financial stability, and population diversity.

This portion of the analysis examines the availability of affordable housing opportunities to individuals and families at various income levels and identifies where within the city there is greater access to affordable housing. Housing affordability, for the purposes of this analysis, will be defined in accordance with the U.S. Department of Housing and Urban Development (HUD) definition which states that “affordable housing is generally defined as housing on which the occupant is paying no more than 30% of gross income for housing costs, including utilities.”

The analysis will review the housing cost burden (e.g., more than 30 percent of monthly income) and severe housing cost burden (e.g., more than 50 percent of monthly income) experienced by households and will consider how the age of the housing stock and potential substandard housing conditions can impact access to affordable housing.

Publicly Assisted Housing

Publicly assisted housing is defined as single- and multi-family residential properties or units that have been developed or rehabilitated using federal, state, or local subsidy, and are therefore bound to income and rent restrictions. Publicly assisted housing is available throughout the city, but is concentrated in City Commission Districts 1, 3, and 5, particularly in the central part of the city in the Midtown/Overtown/Downtown, Allapattah, and Little Havana R/ECAP Corridors. A total of 246 publicly assisted properties and 24,794 total units are located in Miami as of 2024 reporting.

However, as reported in the most recent Assisted Housing Inventory report compiled by the Shimberg Center, of the 165 properties for which there are available subsidy expiration dates, one property aged-out in 2022, two properties aged-out in 2023, and four properties aged-out in 2024. An additional 10 properties are aging out by 2030, for a total of 650 units lost between 2022 and 2030. In addition, as of the 2024 list, 18 of these properties are “Not Ready for Occupancy.”

Assisted Housing Properties and Unit by Funder, Located in the City of Miami	
5-30-24	
	Total
Total Assisted Properties	246
Total Assisted Units	24,794
Properties w/FHFC Funding	139
Properties w/HUD Multifamily Funding	88
Properties w/HUD Public Housing Funding	27
Properties w/Local Housing Finance Authority Funding	42
<i>Properties with Other Local Funding (City of Miami, CRA, Miami-Dade County, NSP, MDC Surtax, etc.) ONLY</i>	14
<i>Properties with 1 funder (No Other Local)</i>	184
<i>Properties with 2 funders (No Other Local)</i>	32
<i>Properties with 3 funders (No Other Local)</i>	16

Source: Shimberg Center for Housing Studies, Assisted Housing Inventory, utilizing various sources with years of last update primarily between 2018 and 2023; City of Miami list of *locally-funded only* properties, provided 5/30/24

Assisted Housing Units and Properties Lost between 2022 and 2030										
	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total Lost
Properties Lost	1	2	4	2	4	0	2	1	1	17
Units Lost	48	39	89	122	137	0	133	79	3	650

Source: Shimberg Center for Housing Studies, Assisted Housing Inventory, utilizing various sources with years of last update primarily between 2018 and 2023

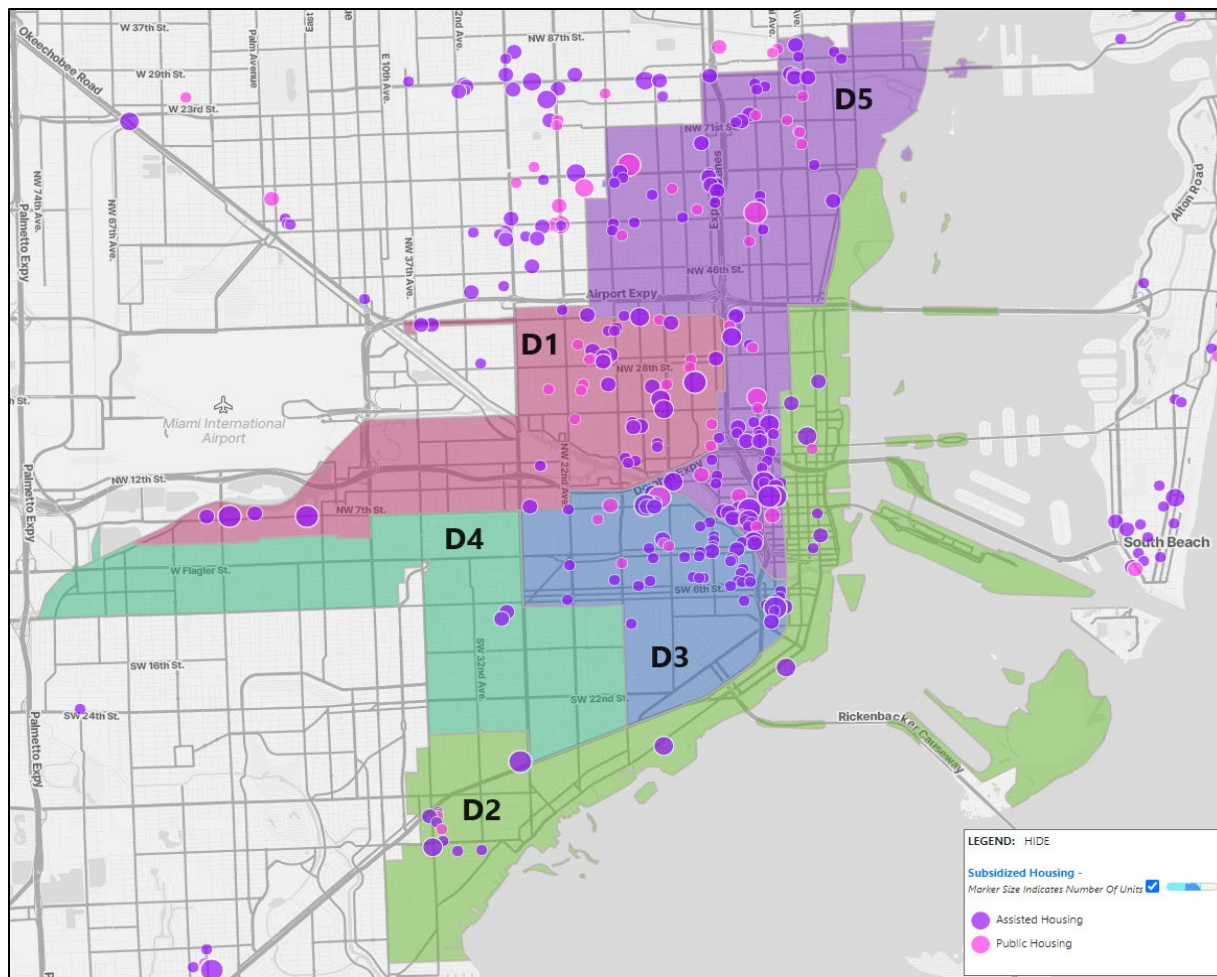
Most of these rental properties are multi-family developments with units available to low-income families (135 properties), and many are set-aside for elderly renters (84 properties). There are a few properties that are for homeless households (13 properties) and for individuals with disabilities (6 properties, plus 42 properties participating in the LINK program for persons with special needs).

Hispanic households of any race make up the majority of those in Public Housing units (2,975 households, or 64%), project-based Section 8 units (2,088 households, or 86%), and other subsidized multifamily rentals (741 households, or 90%), and are the majority of HCV-holders (3,864 households, or 66%). Black households make up the second largest demographic, with 1,608 households in public housing (35%), 273 households in project-based section 8 units (11%), 59 households in other subsidized multifamily rentals (7%), and 1,916 households with Housing

Choice Vouchers (32%). Both White and Asian/Pacific Islander households together make up less than 5% of participants for all four programs.

In 2023, the Miami-Dade Public Housing Authority reported the following demographics breakdown of their Housing Choice Voucher program within the county. Black residents make up the majority of HCV-users in the county with 10,186 individuals making up 52.33% of HCV-users. The split between Hispanic versus Non-Hispanic HCV-users is about even, with 9,515 Hispanic individuals and 9,736 Non-Hispanic individuals. Individuals aged 62 and older using vouchers represent 44.66% of total HCV-users, and individuals that are disabled represent 47.67% of total HCV-users.

The City of Miami also provides a Senior Rental Assistance Program, providing up to \$500/month for up to one year to qualified seniors age 62+. Seniors in the program must make 50% AMI, spend their income on housing costs, and live in rental housing within the City of Miami limits. The application period for this program is closed. Applicants are selected through a lottery.



Source: University of Miami, Miami Affordability Project

Miami-Dade Public Housing Authority HCV Resident Demographics in Miami-Dade County		
	#	%
Age		
Age 62 and older	8,598	44.66%
Under 62	10,653	55.34%
Disability		
Disabled and 62 and over	6,647	34.53%
Disabled and Under 62 of age	2,259	13.14%
Non-disabled	10,075	52.33%
Race		
White	9,014	46.82%
Black	10,186	52.91%
Ethnicity		
Hispanic	9,515	49.43%
Non-Hispanic	9,736	50.57%

Source: Correspondence with Miami-Dade Public Housing Authority staff on 11/27/2023.

HCV Leasing by County Commission District Within Miami City Limits		
County Commission District	Total # of Leases	% of Total Leases
District 2	3,113	16%
District 3	3,178	16%
District 5	2,490	13%
District 6	697	4%
District 7	377	2%
Total	19,360	100%

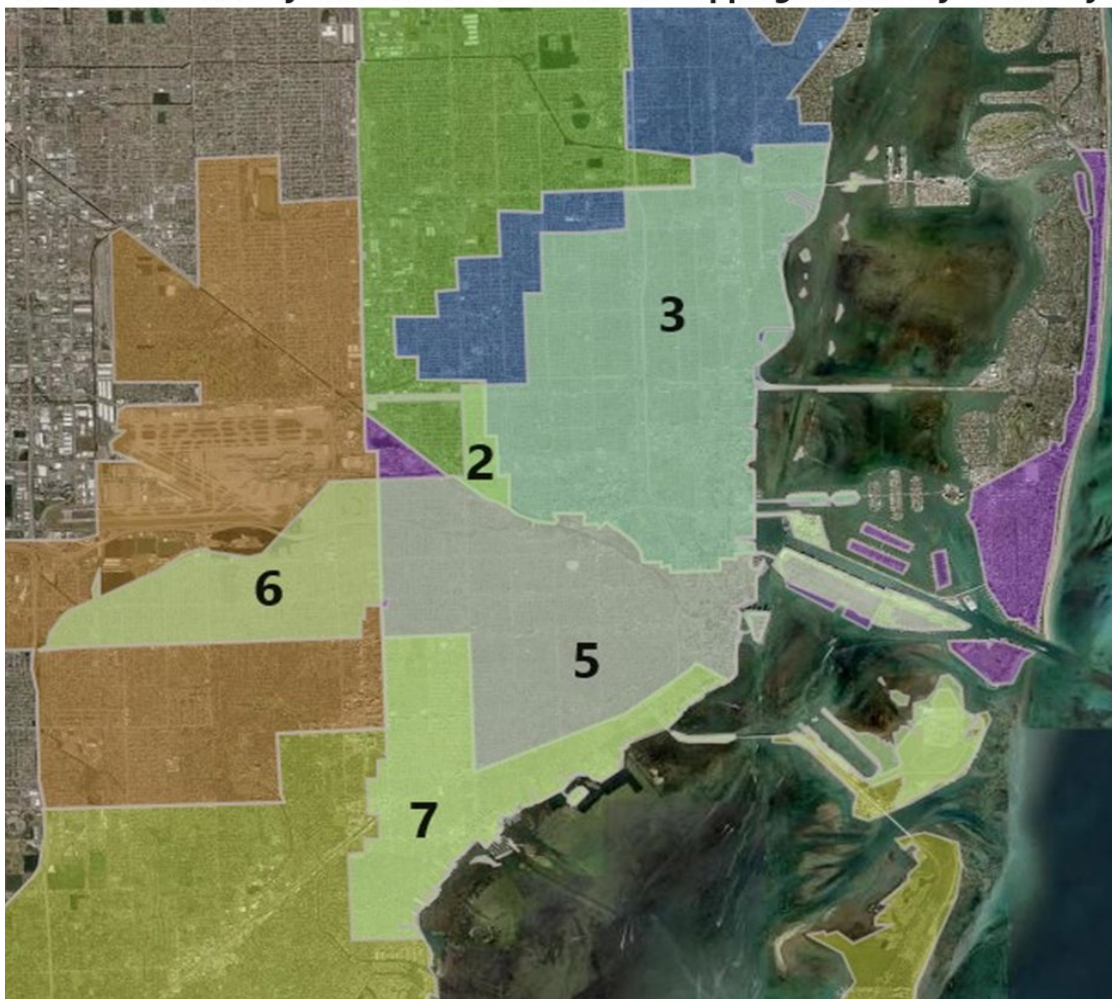
Source: Correspondence with Miami-Dade Public Housing Authority staff on 11/27/2023.

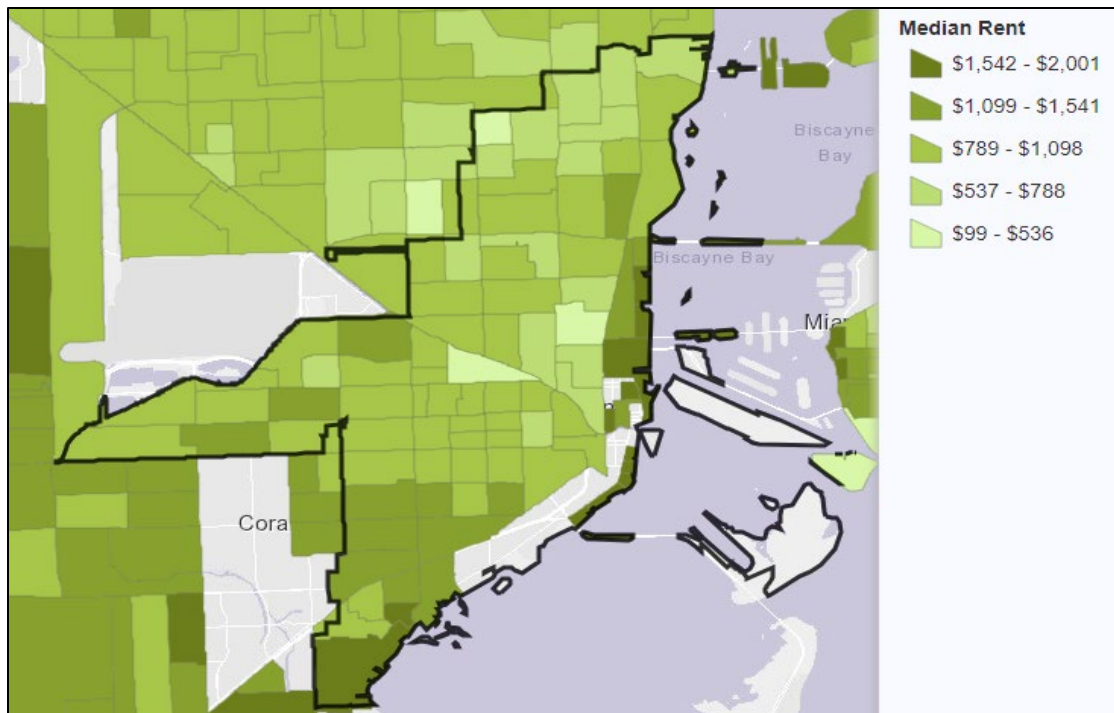
Market Analysis

Data shows that Miami is severely lacking access to affordable housing, particularly for renters, due to a combination of factors including in-migration of people relocating from other parts of the country, aging housing stock, reduced wages, increased rents, and inflation. According to data from Realtor.com, Miami was the fastest growing market in the nation with an increase of 55.3% year-over-year from 2021 to 2022. The median rent for a typical 0-to-2-bedroom unit in February 2022 was twice as high as the estimated maximum affordable rent for the median household; the median rent was \$2,929 versus the calculated maximum affordable rent at the current household income of \$1,476. Families looking to rent making the typical household income in Miami would spend 59.5% of their monthly paycheck on a typical rental.

COVID-19 changed the housing market significantly, exacerbating the affordable housing crisis. Access to affordable rental housing is very competitive and subsidy programs are maxing out funds and voucher allocations. The demand for rental assistance far exceeds resources. Homeownership is also fleeting for all protected classes and all income categories given housing costs, insurance costs, and escalating property taxes in line with escalating assessments, particularly for low-income populations. Post pandemic, the housing market in Miami has not leveled out. Housing values and rents remain high with expectations that the market will stay that way for the foreseeable future. The city continues to seek solutions that are market responsive and that will increase access to affordable housing and support fair housing choice for its residents.

Miami-Dade County Commission Districts Overlapping Miami City Boundary





Source: eGIS Community Assessment Reporting Tool, Local Government: Miami City, Median Rent; last updated 2019.

Housing Cost Burden

Housing cost burden is defined by HUD as when a household pays over 30% of their household income on the cost of housing, including the mortgage/rent, and associated costs like utilities and insurance. The tables below depict the housing cost burden profile for the City of Miami by income category. Data shows that out of 188,569 households, 8,093 extremely low-income households (0-30% AMI) are cost burdened, and 37,869 are severely cost burdened. For very-low-income households (31-50% AMI), 14,960 are cost burdened and 12,355 are severely cost burdened. And for low-income households (51-80% AMI) 12,390 are cost burdened and 4,138 are severely cost burdened. The table below indicates that 102,529 households representing 54% of all households experience cost burden while 56,243 households representing 30% of all households are severely cost burdened.

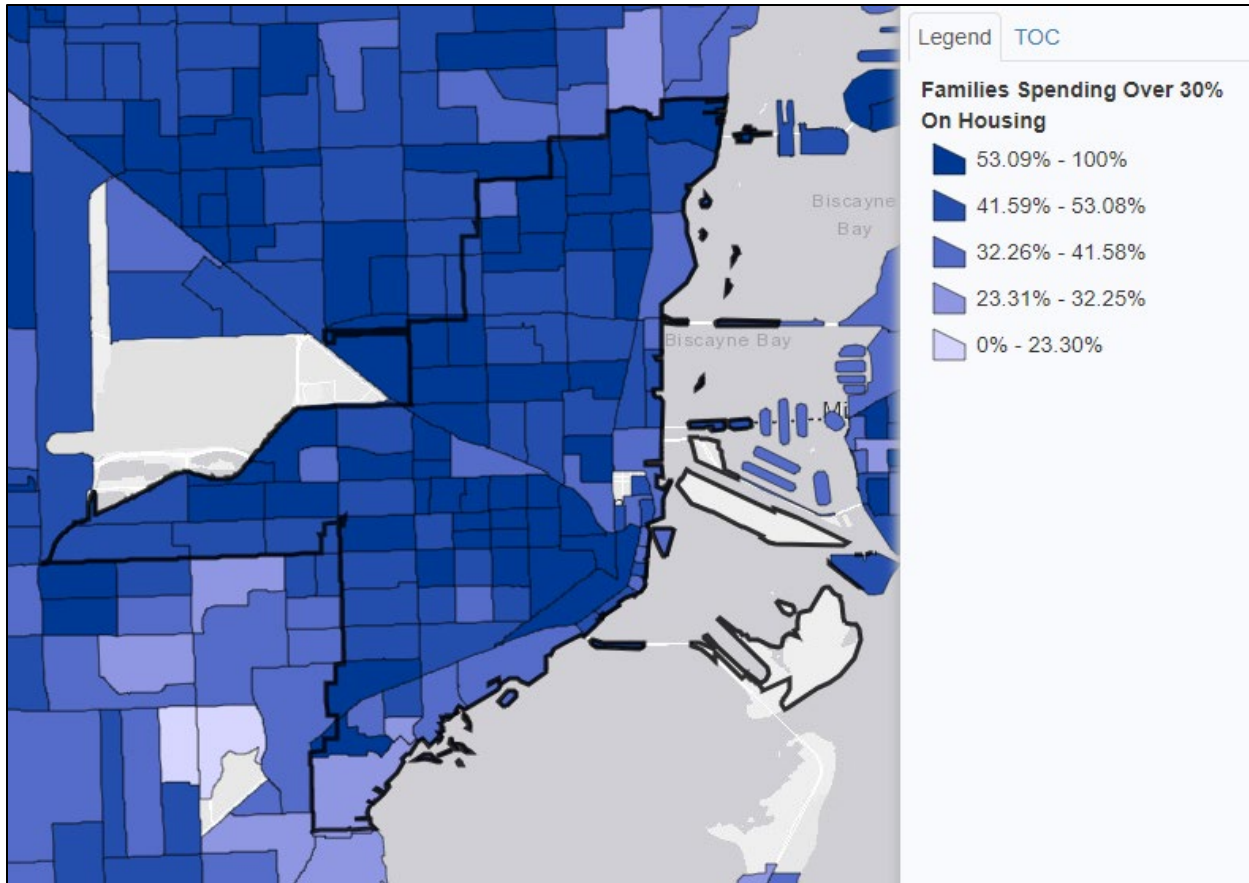
According to the cost burden map below, nearly the entire city is cost-burdened. The areas with the highest concentration of cost-burdened households are a large region in the northern part of Miami, a large region in central Miami near downtown, a portion of census tracts in the western part of Miami and a few in the very southern part of the city. There are 16 census tracts where over 86% of households are spending over 30% of their income on housing and are considered low-income households. These tracts include 71.04, 70.02, 67.06, 66.01, 65.01, 63.02, 71.04, 54.05, 54.06, 53.03, 37.05, 50.02, 49.02, 57.04, 24.02, and 67.13. Within these census tracts, fewer than 10% of available rental units are affordable. These affordable rental units are located in tracts 71.04, 70.02, 67.06, 67.13, 37.05, and 49.02.

Cost Burden by Income in Miami, FL			
Household Income	30% or less	30.1 to 50%	More than 50%
30% AMI or less	10,144	8,093	37,869
30.01-50% AMI	7,384	14,960	12,355
50.01-80% AMI	16,186	12,390	4,138
80.01-100% AMI	9,634	4,632	1,132
Greater than 100% AMI	42,692	6,211	749

Source: Projections by Shimberg Center for Housing Studies, Affordability, Cost Burden by Income, 2022 Estimate, based on U.S. Department of Housing Development, Comprehensive Housing Affordability Strategy (CHAS) data set.

Demographics of Households with Severe Housing Cost Burden in Miami, FL			
Race/Ethnicity	# Households	# w/Severe Cost Burden	% w/Severe Cost Burden
White, Non-Hispanic	23,295	4,815	20.67%
Black, Non-Hispanic	23,330	7,025	30.11%
Hispanic	112,005	36,615	32.69%
Asian or Pacific Islander, Non-Hispanic	1,725	330	19.13%
Native American, Non-Hispanic	195	10	5.13%
Other, Non-Hispanic	1,029	155	15.06%
Total	161,605	48,950	30.29%
Household Type and Size			
Family households <5 people	76,860	22,410	29.16%
Family households 5+ people	11,335	2,575	22.72%
Non-family households	73,410	23,970	32.65%
Note 1: Severe housing cost burden is defined as greater than 50% of income.			
Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.			

Source: Shimberg Center for Housing Studies, Affordability, Households by Tenure, Race/Ethnicity, and Cost Burden, 2015-2019 CHAS dataset.



Source: eGIS Community Assessment Reporting Tool, Local Government: Lee County, Families Spending Over 30% On Housing; last updated 2019.

Age of Housing

The age of the housing is an important factor when determining housing affordability. An aging housing stock often falls into disrepair reducing affordability of the existing housing stock. According to ACS 2022 5-year estimates which provides estimates for all housing units in the current market, in the City of Miami, the largest share of the existing housing stock in Miami constructed in a twenty-year period was built between 2000 and 2019 at 28.6%, followed by housing units constructed between 1940 and 1959 at 25.1%. Looking at housing units by tenure for individual decades, the largest share of owner-occupied homes constructed in a twenty-year period was built between 1940 and 1959 at 33.5%, while the largest share of renter-occupied housing constructed in a twenty-year period was built in 2000 to 2019 period, at 30.8%.

Despite the post-2000 development boom, approximately 57.2% of the entire existing housing stock was built before 1979; of those older housing units, about 19% are owner-occupied while 38% are renter-occupied. Broken down a different way, adding the number of units constructed prior to 1979 versus after 1979 by tenure finds that 54% of the existing rental housing stock was constructed prior to 1979 and 64% of the existing owner housing stock was constructed prior to 1979. Overall, a large proportion of homes in the city are 45 years or older, suggesting that much

of the city’s current affordable housing stock may need significant rehabilitation to maintain suitable living conditions.

Age of Occupied Units by Tenure in Miami, FL						
	Total Occupied Units	% Occupied Units	# Owner-Occupied	% Owner-Occupied	# Renter-Occupied	% Renter-Occupied
Occupied units	186,137	-	56,069	-	130,068	-
2020 or later	1,257	0.7%	100	0.2%	1,157	0.9%
2000 to 2019	53,073	28.6%	13,022	23.2%	40,051	30.8%
1980 to 1999	25,365	13.6%	6,950	12.4%	18,415	14.2%
1960 to 1979	44,125	23.7%	10,167	18.1%	33,958	26.1%
1940 to 1959	46,691	25.1%	18,802	33.5%	27,889	21.4%
1939 or earlier	15,626	8.4%	7,028	12.5%	8,598	6.6%

Source: ACS 2022, 5-Year Estimates, Table S2504.

Substandard Housing Conditions

To better analyze the city’s substandard housing stock and identify disparities in housing quality and housing needs for all residents and protected classes citywide, HUD has provided data on housing problems experienced by Miami households. HUD defines three main housing problems, including substandard housing, overcrowding, and housing cost burden.

- Substandard housing means a housing unit lacking complete plumbing or kitchen facilities.
- Overcrowding means a household having more than 1.01 to 1.5 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms.
 - *Severely overcrowded* means a household has more than 1.5 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms.
- Cost-burdened means a household’s total gross income spent on housing costs exceeds 30% of household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs," which includes mortgage payment, utilities, association fees, insurance, and real estate taxes.
 - *Severely cost-burdened* means a household’s total gross income spent on housing costs exceeds 30% of household income.

According to the US Census 2017-2021 ACS 5-Year estimates as reported by the Shimberg Center for Housing Studies, there are 13,126 units in the City of Miami where people are living with 1.01 or more persons per room, representing 7.2% of all occupied units. Miami’s 2019-2023 Consolidated Plan reported that approximately 89% of all single-family households who

experience crowded housing (sharing a bedroom with another) are renters. Of these households, 2,610 are extremely low-income, 1,825 are low-income, and 1,425 are moderate income (source: 2011-2015 CHAS). The analysis also found neighborhoods with high concentrations of extremely low- and very low-income Hispanic households which have the highest incidence of multiple housing problems including overcrowding and cost-burdened households. This includes the neighborhoods of Little Havana, Allapattah and Flagami.

Several tracts in the R/ECAP areas had over 60% of the households reporting at least one of the housing problems (see map below) including tracts 53.02, 34.00, 51.04, 24.04, 14.01, and 14.02, all with disproportionately high populations of Black and Hispanic families.

Summary of Substandard Housing Units in Miami, FL			
	1.01 or More Persons Per Room	Lacks Complete Kitchen Facilities	Lacks Complete Plumbing Facilities
Number of Occupied Units	13,126	3,027	2,011
Share of Total Occupied Units	7.2%	1.4%	1.0%

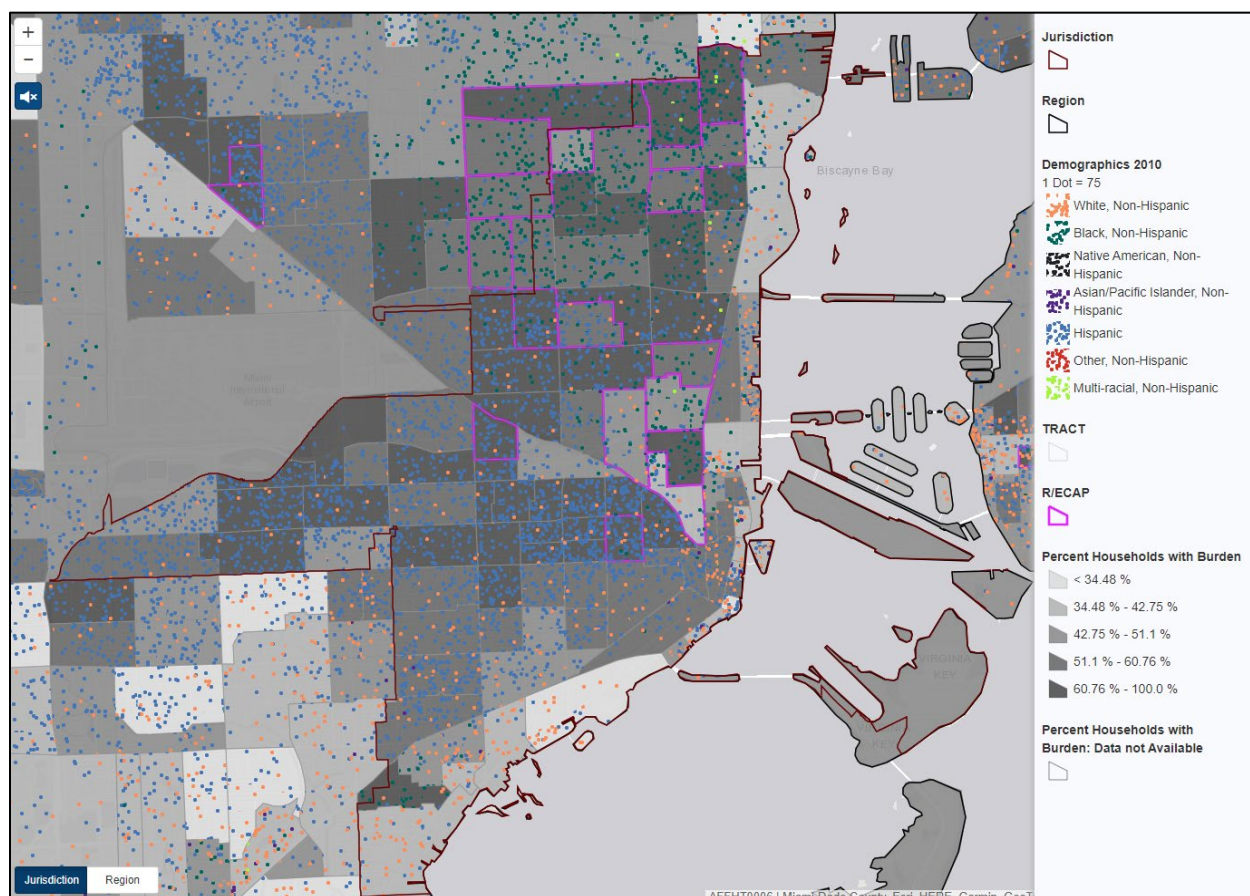
Source: U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates, Shimberg Center for Housing Studies.

Disproportionate Housing Needs by Race/Ethnicity in Miami, FL			
Households Experiencing Any of 4 Housing Problems	# Households	# with Problems	% with Problems
Race/Ethnicity			
White, Non-Hispanic	23,295	9,575	41.10%
Black, Non-Hispanic	23,330	13,885	59.52%
Hispanic	112,005	68,530	61.18%
Asian or Pacific Islander, Non-Hispanic	1,725	640	37.10%
Native American, Non-Hispanic	195	20	10.26%
Other, Non-Hispanic	1,029	420	40.82%
Total	161,605	93,105	57.61%
Household Type and Size			
Family households, <5 people	76,860	43,270	56.30%
Family households, 5+ people	11,335	8,310	73.31%
Non-family households	73,410	41,520	56.56%
Households Experiencing Any of 4 Severe Housing Problems	# Households	# with Severe Problems	% with Severe Problems
Race/Ethnicity			

White, Non-Hispanic	23,295	5,395	23.16%
Black, Non-Hispanic	23,330	8,650	37.08%
Hispanic	112,005	43,835	39.14%
Asian or Pacific Islander, Non-Hispanic	1,725	325	18.84%
Native American, Non-Hispanic	195	10	5.13%
Other, Non-Hispanic	1,029	149	14.48%
Total	161,605	58,370	36.12%

Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

Source: AFFH-T Miami, Table 9 - Demographics of Households with Disproportionate Housing Needs, utilizing Comprehensive Housing Affordability Strategy (CHAS), 2012-2016.



Source: HUD AFFH-T Data Tool, Map 6 – Housing Problems, Percent Households with Burden, utilizing Comprehensive Housing Affordability Strategy (CHAS), 2012-2016

Public Housing Conditions

HUD does routine Real Estate Assessment Center (REAC) physical inspections and provides scores for public housing and multifamily assisted housing across the U.S. The most recent data for non-PHA assisted multifamily was provided as of March 2021 and includes inspections that took place between 2014 and 2019, and the most recent PHA data is from 2022 to 2023 for the Miami-Dade PHA. The average score for the 33 properties located in Miami that were surveyed is 70 out of 100 possible points, with 28 properties having at least one severe health and safety deficiency noted, 5 properties with at least one moderate health and safety deficiency noted, and 16 properties with at least one inoperable smoke detector. Scores for the 79 non-PHA assisted multifamily properties surveyed in Miami averaged 84 out of 100 points, with 48% of properties scoring high in the 90s and 12% scoring low below 60 points, including one with a very low score of 37 points. Property age seems to be a major factor influencing these scores.

ACCESS TO HOMEOWNERSHIP AND ECONOMIC OPPORTUNITY

Introduction

Homeownership stabilizes neighborhoods, builds generational wealth, and increases quality of life. Historically, low- and moderate-income persons, minorities, individuals with disabilities, and other protected class groups experience significant disparities in access to homeownership opportunities and often face discrimination in housing because of race, color, sex, national origin, religion, familial status, and disability. Although illegal under the Fair Housing Act, members of protected classes may face discriminatory practices, such as realtors refusing to sell, applying different terms to a loan application or agreement, steering to minority neighborhoods, and providing misleading information about the availability of housing.

Barriers to Homeownership

While there are many factors that contribute to disparities in homeownership, lack of affordable housing is a primary barrier for all protected classes. For prospective homebuyers in Miami, housing affordability has been significantly impacted by a hostile market stemming from the COVID-19 pandemic. The pandemic brought its own set of unique challenges to the housing market. It resulted in an unprecedented housing market consisting of:

- Higher-priced homes
- Multiple offer situations
- An abundance of cash buyers
- Low inventory of homes creating high demand
- Decreased days on market
- High interest rates
- Increased cost of homeowners insurance
- Appraisal gaps

The market has exacerbated common barriers to homeownership such as lack of capital for down payment and closing costs and insufficient credit history or poor credit, key factors for obtaining homeownership. Unaffordability limits access to homeownership for all protected classes, though Black and Hispanic have lower rates of homeownership than other race/ethnicities.

Down Payment and Closing Costs

When financing a home, down payments and closing costs are required. Depending on the loan product a buyer can pay between 3.5% and 20% of the purchase price for down-payment and up to 6% for closing costs. According to Realtors Property Resource (RPR) the median sale price for a home in Miami as of January 2024 is \$543,000 up 13.02% from January 2023 and a 20.56% increase over 24-months. Based on these estimates, a family will need to save between \$19,005 and \$108,600 for a down payment and approximately \$32,580 for closing costs. The cost of buying a home forces many to obtain loans through the Federal Housing Administration (FHA) which only requires the 3.5% down payment, but this type of loan requires private mortgage insurance which increases the mortgage payment and remains on the loan for many years. Loans through the U.S. Department of Agriculture (USDA) are 0% down-payment loans if buying in rural areas, therefore approximately 100% of Miami-Dade County and the City of Miami is ineligible for traditional USDA loans. Participation in purchase assistance programs and first-time homebuyer programs is not enough to supplement the high costs of homeownership. Continuously increasing home values with limited down-payment and closing cost assistance will likely result in residents having to move out of Miami if wanting to purchase a home.

The Society for Human Resource Management (SHRM) published data that suggests that Black and Hispanic racial/ethnic minorities historically earn less than their white counterparts which can limit access to homeownership opportunities (<https://www.shrm.org/topics-tools/news/benefits-compensation/black-workers-still-earn-less-white-counterparts>).

Insufficient Credit/Poor Credit

Cost burden is a primary barrier to achieving good credit for Miami residents. Cost burden data collected from the Comprehensive Housing Affordability Strategy dataset, indicates that Black and Hispanic people experience the highest rate of severe cost burden in Miami, particularly those earning less than 30% AMI. Individuals with disabilities are also often on fixed incomes and considered very-low-income. Many cost burdened and low-income individuals and families are living paycheck to paycheck which can lead to poor payment history and increased utilization of credit, negatively impacting their credit profile.

Additionally, paying over 50% of household income towards housing costs does not leave room to pay for other essentials like a phone plan, healthcare premiums, or car insurance which can lead to significant debt. Existing debt accounts for 30% of the credit score calculation and payment history accounts for 35%. This method of determining credit worthiness means cost burdened and severely cost burdened households are more likely to have poor or insufficient credit creating barriers to upward mobility.

Insufficient and poor credit also reduces access to homeownership opportunities since conventional loans typically require a high credit score above 700. Other loan products like the Federal Housing Administration (FHA) and United States Department of Agriculture (USDA) allow

a minimum credit score of 580. While lenders have relaxed credit requirements, many cost-burdened low-income households do not have the means to escape their poor credit history.

Disparities in Homeownership

The homeownership rate is defined as the ratio of owner-occupied units to all occupied units in an area. The overall homeownership rate for the City of Miami is low at 30%. Homeownership rates vary by race and ethnicity. The homeownership rate for those identifying as Hispanic/Latino is 68.3%, followed by White, non-Hispanic persons at 17.9%, and Black, non-Hispanic households at 10.4%.

When compared to the demographic makeup of Miami, Black or African American persons experience disproportionate rates of homeownership compared to White alone, those identifying as Hispanic/Latino or as two or more races. Nearly 40% of all White households (White alone, not Hispanic or Latino) are owner-occupied while 24% of all Black households are owner-occupied. Almost 29% of all households identifying as Hispanic or Latino origin are owner-occupied.

Miami’s housing market and structure of the housing stock tends to cater more towards renters. In 2023, Miami-Dade County was reported to be the most competitive rental market with 71.2% of renters deciding to renew their leases (The Capitolist). The predominance of renters also has to do with the severe market shifts over the past few years.

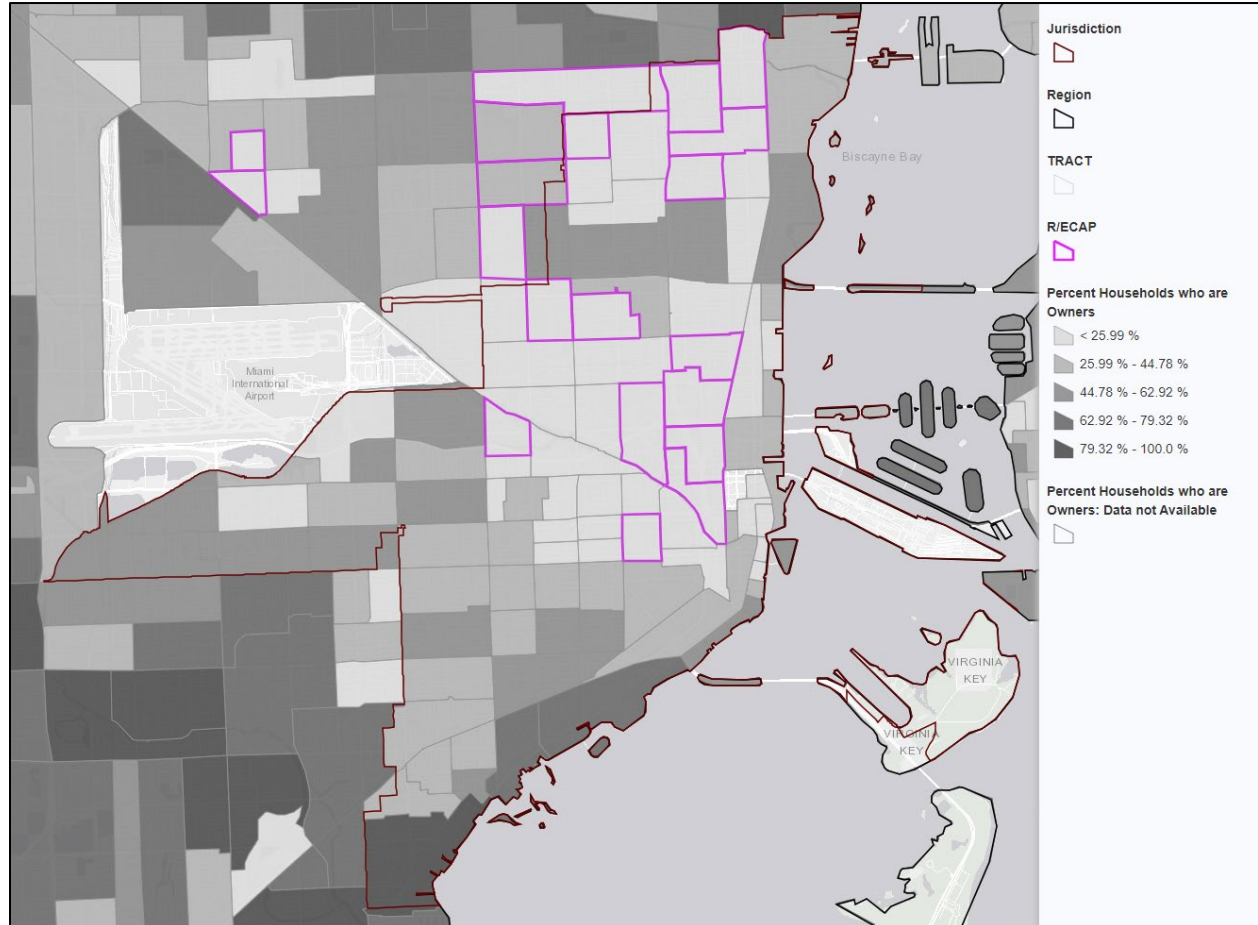
It is probable that low rates of Black homeownership can also be attributed to systemic inequality, segregation, disparate access to credit, and undervaluing homes in Black neighborhoods, which restricts the ability of the Black population to build equity and accumulate wealth through homeownership.

Data also shows that the highest percentage of Miami’s homeowners are located outside of the R/ECAP areas.

Owner-Occupied Housing by Race/Ethnicity		
Race/Ethnicity	Number of Owner-Occupied Housing Units	Percent of Owner-Occupied Housing Units
White	29,432	52.5%
Black or African American	5,845	10.4%
American Indian and Alaska Native	52	0.1%
Asian	1,481	2.6%
Native Hawaiian and Other Pacific Islander	0	0%
Some other race	2,377	4.2%

Two or more races	16,882	30.1%
Hispanic or Latino origin	38,303	68.3%
White alone, not Hispanic or Latino	10,013	17.9%

Source: ACS 2022 5-Year Estimates, Table S2502



Source: HUD AFFH-T tool, Percent Households who are Owners, utilizing Comprehensive Housing Affordability Strategy (CHAS), 2011-2015.

Lack of Income for Individuals with Disabilities

Individuals with disabilities face significant barriers finding affordable, accessible housing sometimes because of discrimination based on their disability status, but primarily because individuals with disabilities are more cost burdened than the general population. Freddie Mac reports, “when compared to the general public, renters and homeowners with disabilities report 1.7-times less annual income, which results in these individuals spending a far greater percentage of their incomes on housing costs” and adds that 40% of renters with disabilities spend more than half their income on housing costs. This significantly decreases homeownership opportunities for individuals with disabilities.

Familial Status

The familial status of a household directly links to the need for available housing of different types and sizes to accommodate those families living with children under the age of 18. Census data shows that of Miami's total households, 19% are households with own children of the householder under the age of 18. The average household size is 2.33 people and most of the housing stock in the city is in the two-bedroom format, followed by the one-bedroom format to accommodate these family types. The City of Miami is extremely compact with limited amounts of vacant land, so recent residential construction is in multi-family buildings. The lack of diversity in housing types can create access and affordability barriers for larger families seeking to own a home.

National Origin

Census data indicates that Miami is a majority-minority city (an area whose population is composed of less than 50% non-Hispanic whites) with only 14% of the population being non-Hispanic whites and that 70% of the population speaks Spanish. Haitian Creole is also a predominant language in Miami. Studies have noted higher rates of LEP (Limited English Proficiency) are associated with lower homeownership rates. The factors directly correlating LEP with lower homeownership rates are still unknown. One reason may be the mortgage loan application process. Applications may include technical language primarily formatted in English, which may be difficult for non-English speaking people to navigate. Since most of Miami's population speaks a language other than English, there is access to translation services to help navigate the purchase process and increase homeownership opportunities. Immigration status can also depress access to homeownership.

Homeownership Programs

State Housing Initiatives Partnership Program (SHIP)

The City of Miami has a program known as SHIP (State Housing Incentives Partnership) Home Buyer Financing Program to assist eligible households with purchasing a home by providing a deferred payment loan (based on need) to be applied as down payment, closing costs, and/or mortgage financing.

Criteria for the SHIP program include:

1. Maximum assistance limits. For a family with what HUD considers to be very low income, the maximum amount of assistance that can be received to purchase a home is based on the bedroom size of the home being purchased and the financing needs of the applicant. For a three-bedroom unit, the maximum award is \$86,020.
2. Eligibility requirements state applicants must not have owned a home within the last three years or filed for bankruptcy in the last two years.

There are strict program requirements too, including qualifying credit and sufficient income for first mortgage financing and completion of pre-approved Homebuyer Education Counseling.

HOME Investment Partnerships Program (HOME)

The city uses a portion of its annual allocation of federal HOME funds to provide down-payment and closing cost assistance for eligible homebuyers. The city's First Time Homebuyer program provides zero percent (0%) deferred loans to first-time homebuyers purchasing a property in the City of Miami if they qualify based on their income category.

District 5 Expanded First-Time Homebuyer Program

The City of Miami District 5 Expanded First-time Homebuyer Program can provide up to \$200,000 (based on household income and need) to assist with acquisition financing and down payment assistance to qualified, income-eligible households towards purchasing an eligible property as their home within District 5 boundaries. The primary applicant must currently reside within the City of Miami, never have owned a home before, and ultimately be able to secure a first mortgage from a lender subject to the city homebuyer program's mortgage restrictions. This program's residency requirement will be waived if the applicant household includes a current City of Miami or Miami-Dade County first responder.

Affordable Housing Homebuyer Loan Program

The Homebuyer Loan Program (HLP) was created in 2015 to assist qualified individuals and families in the purchase of a primary residence. The HLP is intended to encourage homeownership as a foundation for financial independence for low- and moderate-income families in Miami Dade County. The loan term is 30 years with a maximum loan amount of up to \$100,000 at 1% interest or \$80,000 at 2% interest – rate based on vulnerability ranked areas. This is funded using the county's Documentary Surtax funds and can help households of up to 140% AMI.

Section 8 Homeownership Program for Housing Choice Voucher Recipients

The Miami-Dade Housing Choice Voucher Homeownership is a voluntary program designed to permit eligible Housing Choice Voucher recipients to purchase a home using the voucher subsidy for up to 15 years. The goal of the program is to provide homeownership opportunities, along with counseling, self-sufficiency, training, and support, thereby facilitating economic opportunity within communities while providing parameters to ensure the success of the homebuyer.

Access to Economic Opportunities

Access to Livable-Wage Jobs

According to RentCafe, the cost of living in Miami is 19% higher than the state average and 17% higher than the national average. Miami’s housing is 51% more expensive than the U.S average, while utilities are about 2% pricier. When it comes to basic necessities such as food and clothing, groceries are around 6% more in Miami than in the rest of the country, while clothing costs around 6% more.

As the cost of living continues to rise it is important that Miami residents have access to livable wage jobs. The top five employment industries in Miami are office and administrative support, sales and related occupations, food preparation and serving related occupations, transportation and material moving occupations, and business and financial operations occupations. The average hourly wage of the top ten employment industries is \$30.57. The 2023 ALICE (Asset Limited, Income Constrained, Employed) report published by United Way indicates based on the 2021 Point-in-Time data that Miami’s median household income is \$59,044 and census data from 2022 five-year estimates indicates Miami’s median household income to be \$54,858. Both estimates fall below the state average of \$63,062, and the labor participation rate is 63.2%, which is above the state average at 59.1%.

The ALICE report states that for Miami-Dade County, a 4-person household (2 adults, 1 infant, 1 preschooler) would need to make an hourly wage of \$38.14 to support household costs. This wage equals an annual salary of approximately \$76,272. The living wage calculator developed by Massachusetts Institute for Technology reports a typical annual salary in Miami-Dade County to be \$42,600 for office and administrative support, \$47,130 for sales and related occupations, \$31,580 for food preparation and serving related occupations, \$42,010 for transportation and material moving occupations, and \$78,600 for business and financial operations occupations. All industries except business and financial operations have annual salaries below the estimated livable salary. In fact, according to the living wage calculator, of all the employment industries in Miami-Dade County and surrounding areas, including Miami, only six industries report having salaries above the living wage. All six of those industries would be considered management or professional employers, requiring a higher education or postgraduate degree.

2022 Employment and Wages of Top Occupations With Highest Employment in Miami-Dade County		
Occupation	Employment	Average Hourly Wage
Total all occupations	2,623,770	\$28.36
Average Wage of 10 Highest Employment Occupations	-	\$30.57
Office and Administrative Support Occupations	390,250	\$21.19

Sales and Related Occupations	296,370	\$23.83
Food Preparation and Serving Related Occupations	239,990	\$15.73
Transportation and Material Moving Occupations	239,370	\$22.59
Business and Financial Operations Occupations	188,570	\$40.91
Healthcare Practitioners and Technical Occupations	170,310	\$43.23
Management Occupations	159,360	\$59.51
Educational Instruction and Library Occupations	111,280	\$28.6
Installation, Maintenance, and Repair Occupations	106,820	\$24.72
Construction and Extraction Occupations	101,080	\$25.43

Source: Miami-Dade County Economic Data Snapshot

2022 Employment and Wages of Lowest Paid Occupations in Miami-Dade County		
Occupation	Employment	Average Hourly Wage
Total all occupations	2,623,770	\$28.36
Average Wage of 10 Lowest Paid Occupations	-	\$12.94
Packers and Packagers, Hand	9,970	\$13.24
Ushers, Lobby Attendants, and Ticket Takers	1,830	\$13.19
Cashiers	58,450	\$13.04
Dishwashers	13,100	\$13.02
Parking Attendants	5,270	\$12.94
Fast Food and Counter Workers	43,370	\$12.93
Graders and Sorters, Agricultural Products	350	\$12.8
Laundry and Dry-Cleaning Workers	4,390	\$12.75
Shampooers	NA	\$12.21

Source: Miami-Dade County Economic Data Snapshot

Access to Mortgage Services and Other Financial Institutions

The Federal Deposit Insurance Corporation (FDIC) reports 107 financial institutions in the City of Miami including several larger nationwide banks such as Bank OZK, First National Bank, Bank of America, First American Bank, Truist, Chase Bank, Wells Fargo, and TD Bank. Bank of OZK has a location inside of census tract 28, which is the Midtown/Overtown/Downtown Corridor R/ECAP. Not many banks or financial institutions are located within Miami's R/ECAP areas, but some have locations near the Allapattah Corridor, Sewell Park (North) Quadrant, East Little Havana Corridor, and Midtown/Overtown/Downtown Corridor including First American Bank, Truist, and Wells Fargo.

With the digital age, buyers now have an abundance of access to mortgage brokers online that serve Miami including top companies like Rocket Mortgage and Loan Depot who can often offer better interest rates and terms on home loans than traditional financial institutions.

While there is access to mortgage services and other financial institutions, obtaining a mortgage is also dependent on the loan products offered. Most offer FHA and VA loans which require low down payments and some like Wells Fargo and TD Bank offer first-time homebuyer programs that provide down-payment or closing cost assistance.

Historically, there is less access to financial institutions located in segregated areas or the R/ECAPs of focus for this plan. Segregated areas have increased access to alternative financial services like check-cashers and same-day and pay-day lenders. The Brookings Institution reports that “Black and Latino or Hispanic people are more likely than white people to depend on high interest financial services like check cashing counters and payday lenders because there are fewer banks in Black and Latino or Hispanic neighborhoods” (www.brookings.edu/articles/an-analysis-of-financial-institutions-in-black-majority-communities-black-borrowers-and-depositors-face-considerable-challenges-in-accessing-banking-services). These alternatives are usually low in quality but high in cost and trap borrowers in a cycle of debt.

Access to Fair and Affordable Credit

Credit accessibility is directly linked to housing and financial stability and is needed to own or rent a home, purchase a car, or get insurance. For some, lines of credit or personal loans are needed to pay rent or cover the basics costs of living, particularly for cost burdened households or those on fixed incomes.

According to The Pew Charitable Trusts, banks have dramatically expanded their small lending since 2018. Small-dollar loans make it possible for millions of consumers with low or no credit scores to borrow safely and save borrowers money compared to high-cost credit products from payday, auto title, pawn, and rent-to-own providers. Small loans offer a safe, affordable alternative for most of the nation’s low- and no-credit history borrowers. Depending on the bank, loans can be in an amount up to \$500, \$750, or \$1,000.

The Pew Charitable Trusts also states there are small lending standards that should be considered by banks and credit unions including:

- **Access.** Credit should be available to existing bank and credit union customers who need the most help, are able to repay, and do not qualify for other loans.
- **Affordability.** Loans and lines of credit should offer enough time to repay, usually at least three months, so that each installment consumes only a small share of a borrower’s income.

- Fair pricing. The total cost of the loan should be only a small fraction of the loan’s principal but be sufficient to ensure the bank can provide widespread access to small credit.
- Speed. Application processes should be fast and easy, leveraging online and mobile banking technologies, and funds should be provided the same day.

As of April 2023, six of the eight largest U.S. banks by branch count, which collectively operate 23% of all bank branches, had rolled out small installment loans or lines of credit that cost at least 15 times less than average payday loans. These banks include Regions Bank, Truist, Wells Fargo, Bank of America, Huntington Bank, and U.S. Bank. Several of these banks operate in Miami offering small loans to all protected classes and those who have low to no credit history including Truist, Wells Fargo, and Bank of America. Of the banks offering small loans, none operate branches directly within the R/ECAP areas.

The National Credit Union Administration’s (NCUA) Payday Alternative Loan program is also creating more alternatives for borrowers by allowing federal credit unions to provide loans designed to give consumers a more affordable alternative to predatory payday loans, which carry high APRs and short repayment terms. This loan program set a record for new loan volume, reaching an all-time high with \$227 million originated in 2022.

UNIFY Credit Union is the primary provider of alternative loans in Miami and while there are no branches within Miami city limits, there are several co-op shared branches in Miami, including co-op branches near the Midtown/Overtown/Downtown Corridor R/ECAP.

There are also various Low-Income Designated Credit Unions (LIDCU) operating in Florida. These institutions primarily serve members that meet certain low-income thresholds based on data available from the U.S. Census Bureau. Benefits for protected and marginalized populations include eligibility for grants and low-interest loans from the Community Development Revolving Loan Fund and the ability to accept non-member deposits from any source. Dade County Federal Credit Union is an LIDCU operating in Miami and has a branch location in tract 36.06 which is within the Midtown/Overtown/Downtown Corridor R/ECAP.

In addition, MPS Credit Union serves the Miami community and is designated a Juntos Avanzamos, Together We Advance institution which is a designation for credit unions committed to serving and empowering Hispanic and immigrant consumers – helping them navigate the U.S. financial system and providing safe, affordable and relevant financial services.

Miami residents also have access to several credit counseling services, both onsite and virtually, including 123 Credit Counselors, Inc which is an approved credit counseling agency pursuant to 11 U.S.C. § 111.

Access to Reputable Financial Counseling Services

Financial counseling in Miami can be accessed on site and virtually through several organizations. The United Way Miami helps working individuals and families pave a path to financial independence through its Center for Financial Stability. The United Way offers access to three sites throughout Miami-Dade, including two sites within city limits, and provides a full menu of financial capability services, ranging from financial coaching and education to tax preparation.

There are also three primary housing counselors in Miami that provide financial counseling as part of their services. The Cuban American National Council is located in census tract 53.03 which is near the East Little Havana Corridor R/ECAP and Haitian American Community Development Corporation (HACDC) is located in tract 14.02 which is within the Little Haiti Corridor R/ECAP.

The Cuban American National Council in Miami offers financial education and housing counseling to low- and moderate-income individuals that includes basic financial education, loss mitigation counseling, first time – homebuyer education and mortgage default assistance to homeowners at risk of losing their homes. All Economic Independence clients are assisted in establishing good credit, savings and other wealth building strategies. CNC offers Economic Independence services free of charge.

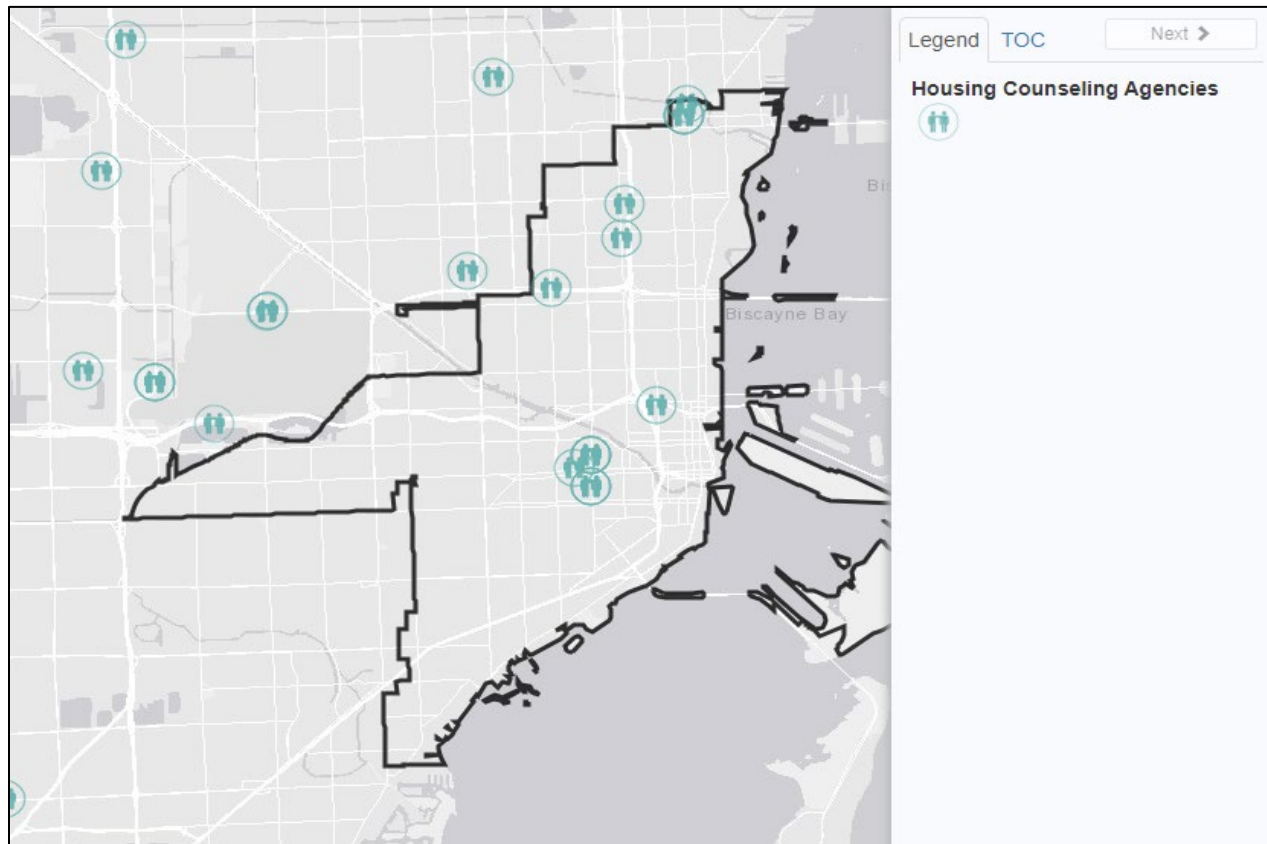
The HACDC works with clients to resolve their credit issues, create a working budget, secure market-rate mortgages, as well as subsidized loans that make their new home affordable. Assembly of buyer financing with the required multiple layers of lending is perhaps the most labor-intensive element of the counseling program as it requires many meetings with the clients to collect updated documents for the various lenders, both private and governmental.

Neighborhood Housing Services of South Florida (NHSSF) combines a proven educational system with personalized one-on-one counseling and financial coaching to bring the dream of homeownership closer to reality. This organization provides a variety of classes, workshops and counseling services in English, Spanish and Creole.

Housing Counseling Agency	Address	Language Assistance	Website
Cuban American National Council, Inc. – Miami	1223 SW 4 th Street, Miami, FL 33135	English Spanish	www.cnc.org
Haitian American Community Development Corporation	181 NE 82 nd St., Miami, FL 33138	English Haitian-Creole	www.haitianamericancdc.org

Neighborhood Housing Services of South Florida	300 NW 12 th Ave., Miami, FL 33128	English Spanish Haitian- Creole	www.nhssf.org
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Source: Local Government: Miami City, Housing Counseling Agencies.



Source: eGIS Community Assessment Reporting Tool, Local Government: Miami City, Housing Counseling Agencies.

Fair Residential Real Estate Appraisals and Valuations

Studies show minorities are more likely to receive an appraisal value that is lower than the contract price during purchase transactions. Also, appraisers' opinions of value are more likely to fall below the contract price in Black and Latino census tracts, and the extent of the gap increases as the percentage of Black or Latino people in the tract increases. "In the average U.S. metropolitan area, homes in neighborhoods where the share of the population is 50 percent Black are valued at half the price as homes in neighborhoods with no Black residents. There is a strong and powerful statistical relationship between the share of the population that is Black and the market value of owner-occupied homes." (Devaluation of Assets in Black Neighborhoods) Segregation and racial disparities in home appreciation put the Black population at a disadvantage in their ability to build equity and accumulate wealth.

ACCESS TO COMMUNITY ASSETS

Introduction

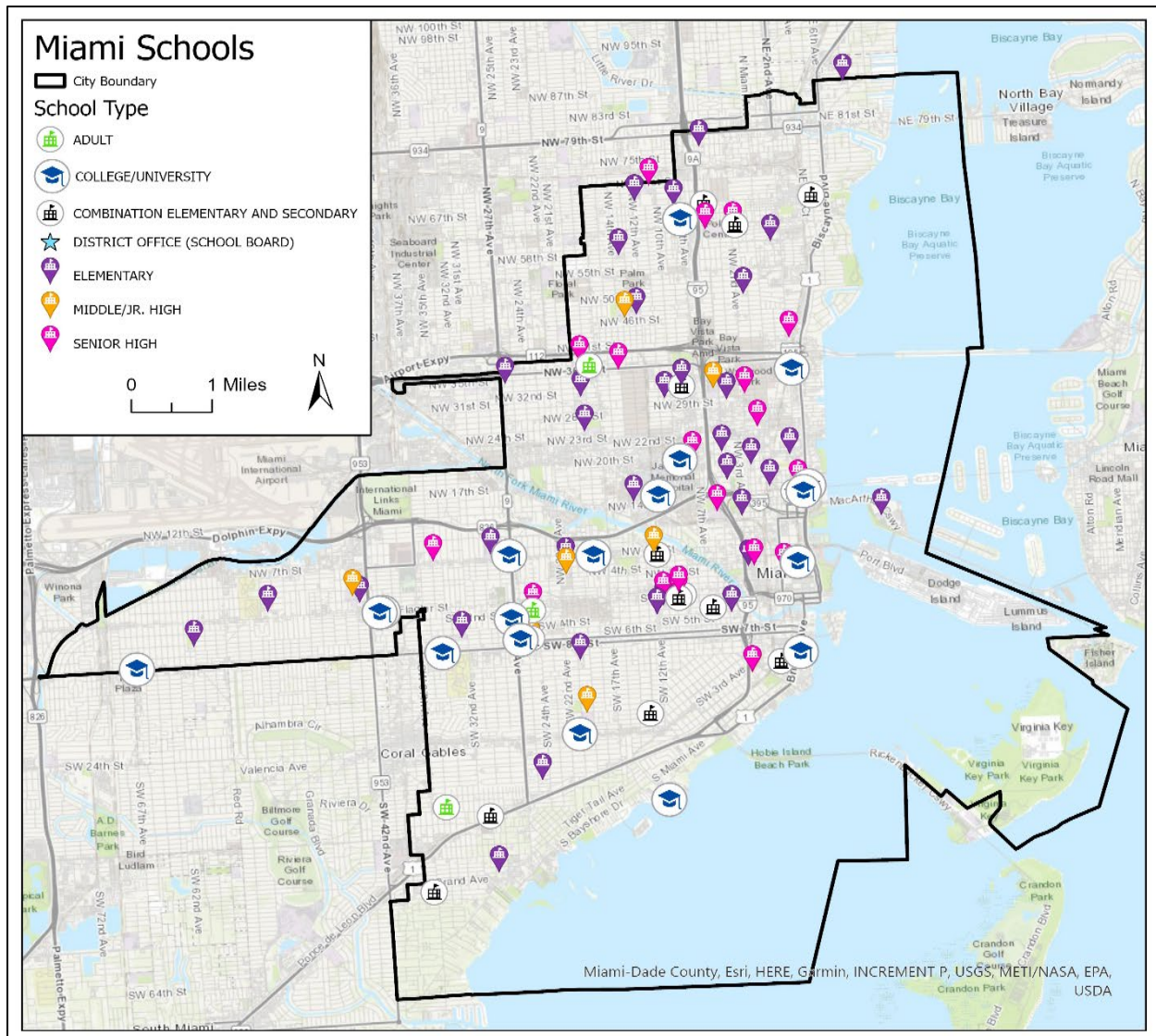
Community assets are things that can be used to improve the quality of life and access to resources is essential to supporting self-sufficiency and promoting the economic vitality of the community. For the purposes of this analysis, we look at disparities in access to community assets such as education, employment, transportation, low-poverty, environmental health, broadband services, and accessibility.

Education

Schools are an essential component in the long-term health of a community. The strength of the community and income mobility depend on the quality of schooling a child receives. Access to quality education is the gateway to employment, resources, and skills that help people achieve self-sufficiency. Educational attainment is essential for escaping poverty.

There is significant value to having access to a quality education as it directly correlates to earning potential. The Bureau of Labor Statistics reports that workers with a high school diploma make on average nearly \$10,000 more annually than those without. According to CollegeBoard, college graduates earn about 73% more than high school graduates, and those with graduate degrees may earn up to three times as much as high school graduates. People completing higher levels of education are less likely to be unemployed and less likely to live in poverty, which increases access to quality housing.

According to the Civil Rights Data Collection (CRDC) website, there are 494 schools in the Miami-Dade County Public School District with 354,848 students, including 472 Title I schools, 7 schools designated Special Education, 105 schools with magnet programs, 130 charter schools, 87 schools offering AP, and 427 schools with gifted/talented programs. Below is a map of schools within Miami city limits.



Source: Florida Housing Coalition, utilizing Florida Geographic Data Library Geospatial Clearinghouse, School Facilities (Public and Post-Secondary) in Florida – 2023.

School Proficiency and Demographics

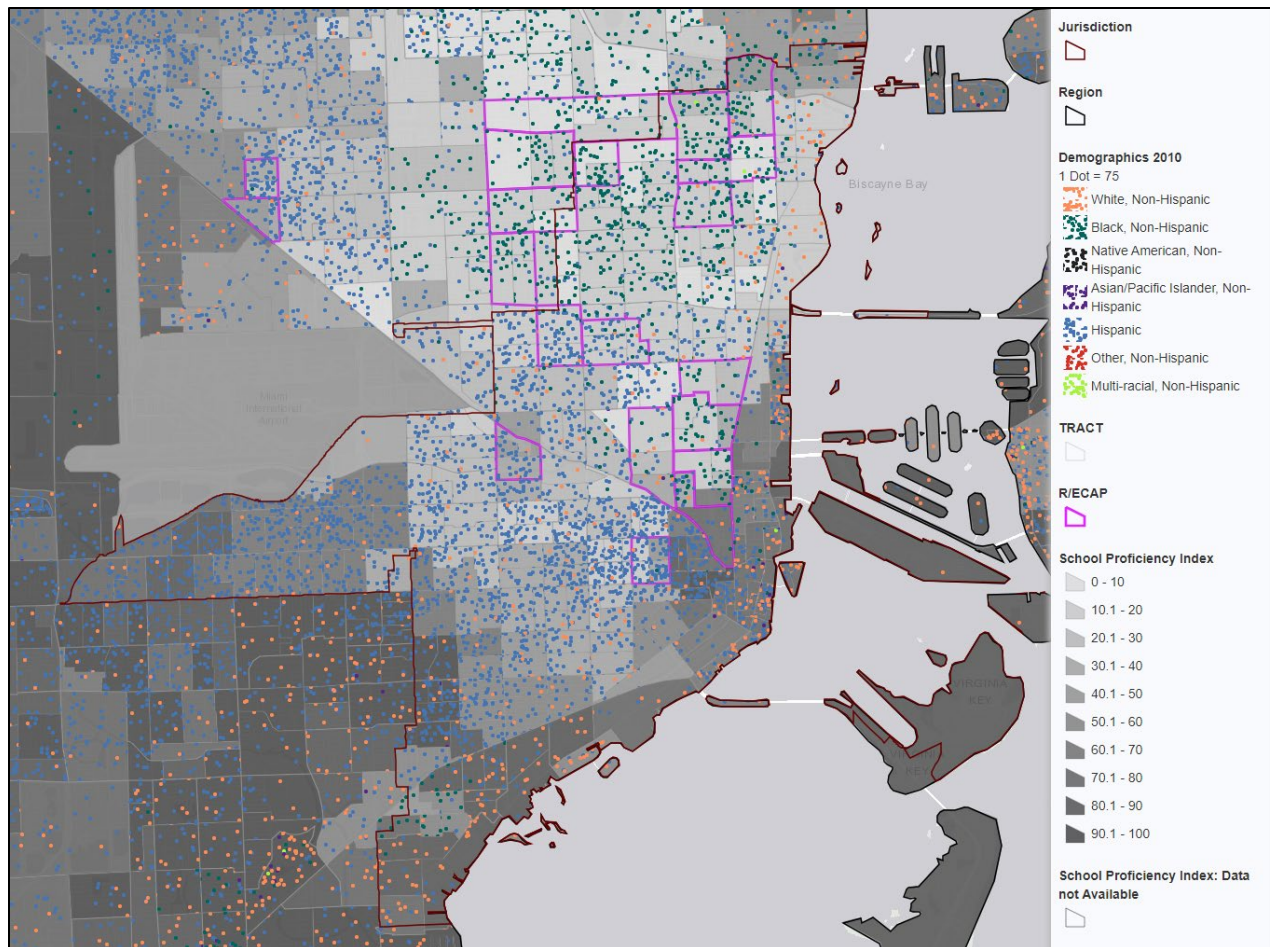
In the School Proficiency Index (HUD AFFH-T), values range from 0-100. The higher the score, the higher the quality of the school system in a neighborhood. In the jurisdiction of Miami, data suggests that Non-Hispanic White students and Asian or Pacific Islander students have access to higher quality schools compared to Hispanic, Black, and Native American students. Black students have particularly poor access to quality schools. These same trends are present for White, Black, Hispanic, and Asian/Pacific Islander students below the poverty line, where White students have over double the chance of being near a high-quality school than Black students.

Census tracts where the School Proficiency Index scores are lower are concentrated in the northern part of Miami, and many fall within historically-Black R/ECAP areas. Census tracts with higher School Proficiency Index scores are concentrated within the southern and western

neighborhoods of Miami where there is a higher concentration of White and Hispanic communities.

Miami, FL CDBG Jurisdiction School Proficiency Index	
Total Population	
White, Non-Hispanic	57.24
Black, Non-Hispanic	22.62
Hispanic	45.31
Asian or Pacific Islander, Non-Hispanic	55.56
Native American, Non-Hispanic	33.97
Population below Federal Poverty Line	
White, Non-Hispanic	47.08
Black, Non-Hispanic	21.95
Hispanic	39.11
Asian or Pacific Islander, Non-Hispanic	40.15

Source: HUD AFFH-T tool, Table 12 – Opportunity Indicators by Race/Ethnicity, utilizing Great Schools (proficiency data), 2016-17; Common Core of Data (4th grade enrollment and school addresses), 2016-17; Maponics School Attendance Zone database, 2018.



Source: HUD AFFH-T tool, School Proficiency Index, utilizing Great Schools (proficiency data), 2016-17; Common Core of Data (4th grade enrollment and school addresses), 2016-'17; Maponics School Attendance Zone database, 2018.

Demographic Enrollment and Absentee Rates

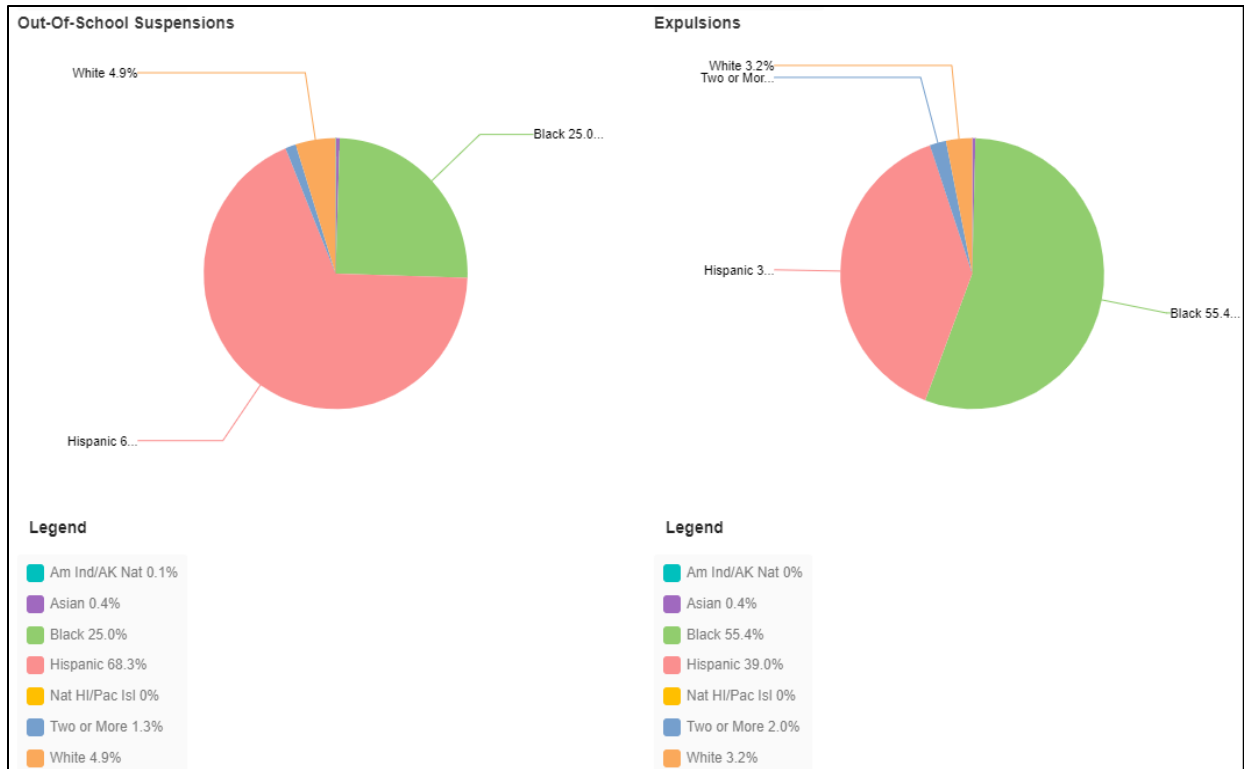
Data from Civil Rights Data Collection shows that in Miami-Dade County Public Schools, the vast majority of enrolled students are Hispanic (70.9%), followed by 20.5% that are Black, and 6.9% that are White. The number of chronically absent students, in-school suspensions, and out-of-school suspensions somewhat reflect these overall proportions of student races/ethnicities. However, the number of Black students experiencing expulsion is disproportionate to their percent of overall students, with 55.4% of all expulsions being Black students.

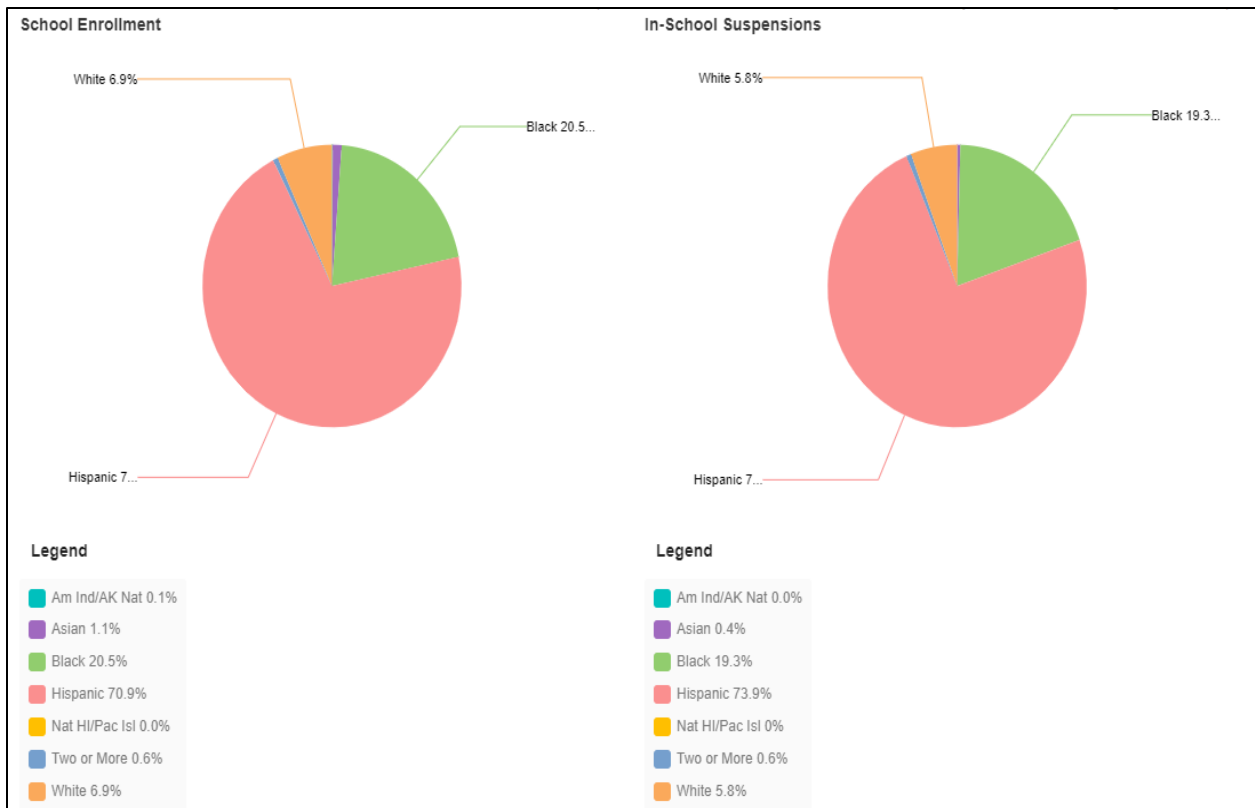
Public School Enrollment and Absentee Rates

Miami-Dade County Public Schools	Student Enrollment	Chronically Absent
All Students	100%	19.30%
American Indian or Alaska Native	0.10%	0%
Asian	1.10%	0.10%
Black or African American	20.50%	4.90%
Hispanic or Latino of any race	70.90%	13.00%
Native Hawaiian or Other Pacific Islander	0.00%	0%
Two or more races	0.60%	0.10%
White	6.90%	1.10%
English Learner (EL)	20.30%	2.70%
Disability (IDEA + Section 504)	12.30%	3.50%

Source: Civil Rights Data Collection, LEA Summary of Selected Facts for Dade Miami, FL School District, Survey Year: 2017.

Source: Source: Civil Rights Data Collection, LEA Summary of Selected Facts for Dade Miami, FL School District, Survey Year: 2017.





Source: Source: Civil Rights Data Collection, LEA Summary of Selected Facts for Dade Miami, FL School District, Survey Year: 2017.

Disparities in Education

Differences in school quality are often attributed to the degree of wealth in neighboring communities, a high-quality school with excellent test results, graduation rates, and programs, is able to achieve those results through increased spending and the relative wealth of its students. On the other hand, underfunded schools are often captured in a self-reinforcing and debilitating cycle: significant disinvestment, lower student performance, increased rates of truancy, and abandonment of neighborhoods by wealthy and stable families. Thus, when examining school performance, it is reasonable to expect a connection between high-poverty neighborhoods, poor school performance, and poor student performance.

During the public engagement meeting with Miami residents on November 30, 2023, teacher salaries and a lack of teacher housing that is affordable and located in close proximity to schools were stated as the two primary barriers to quality education. Residents expressed a need for the school district to consider utilizing school district-owned lands to house teachers. A project is currently underway on Miami-Dade County-owned land in the Brickell neighborhood where educator housing will be co-developed on-site with a new school. The 7-story project is a collaboration between Miami-Dade County, public housing and community development, and the school district. Of the 465 units planned, 45% will be 600-square-foot workforce housing units located on the second and third floors, while the rest of the facility will be classrooms for grades 6-8, labs, and other school-related uses. The School Board is also looking at a property at the

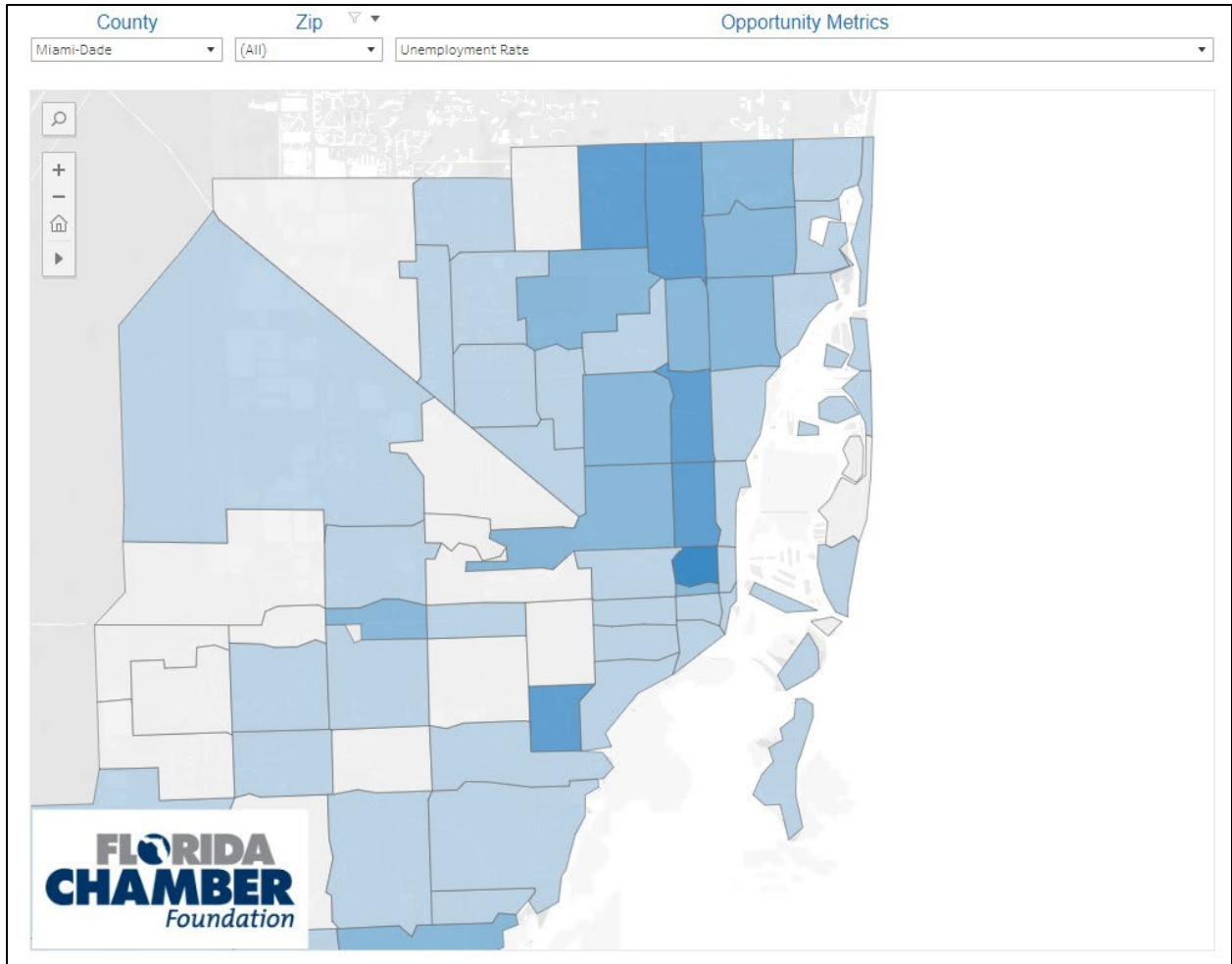
border of Overtown and Wynwood, Phillis Wheatley Elementary School, to redevelop with workforce housing and a new school.

Employment

Access to employment and the labor market has a significant impact on a jurisdiction's economic sustainability. Employment is a significant factor for self-sufficiency and economic growth as the employed can contribute to local businesses, which assists in stabilizing the community. Without access to suitable employment, many low-income people do not have access to decent, safe, and affordable housing.

Employment data is largely available at the Miami-Dade County level, and the Miami-Miami Beach-Kendall, FL metropolitan statistical area (MSA) level. Within both the County and the MSA, the unemployment rate has been steadily going down since the COVID pandemic, according to the U.S. Bureau of Labor Statistics. Nearly 150,000 individuals were unemployed in the County in 2020, but that number has come down to below 50,000 since 2022. The unemployment rate for the County was 12.0% in 2020, compared to a record low of 1.4% in January of 2024 and 2.0% today. The U.S. Bureau of Labor Statistics also reported that the City of Miami, FL had the lowest unemployment rate out of the 50 largest U.S. cities with a rate of 1.8%.

The Florida Chamber Foundation publishes a map called the Florida Gap Map which maps the unemployment rate by zip code, where darker blue zip code blocks indicate a higher unemployment rate, versus lighter blue zip code blocks indicate a lower unemployment rate. According to this data, existing unemployment is concentrated in the northern part of Miami and is particularly high within the Midtown/Overtown/Downtown Corridor, the Liberty City Corridor, and the Little Haiti Corridor R/ECAPs. The zip code with the highest unemployment rate is 33136 with an unemployment rate of 12.0%. Zip code 33150 has the second highest unemployment rate with 9.6%, followed by 33127 with an unemployment rate of 8.0%.



Source: The Florida Gap Map, Florida Chamber Foundation, Updated Dec. 12, 2023.

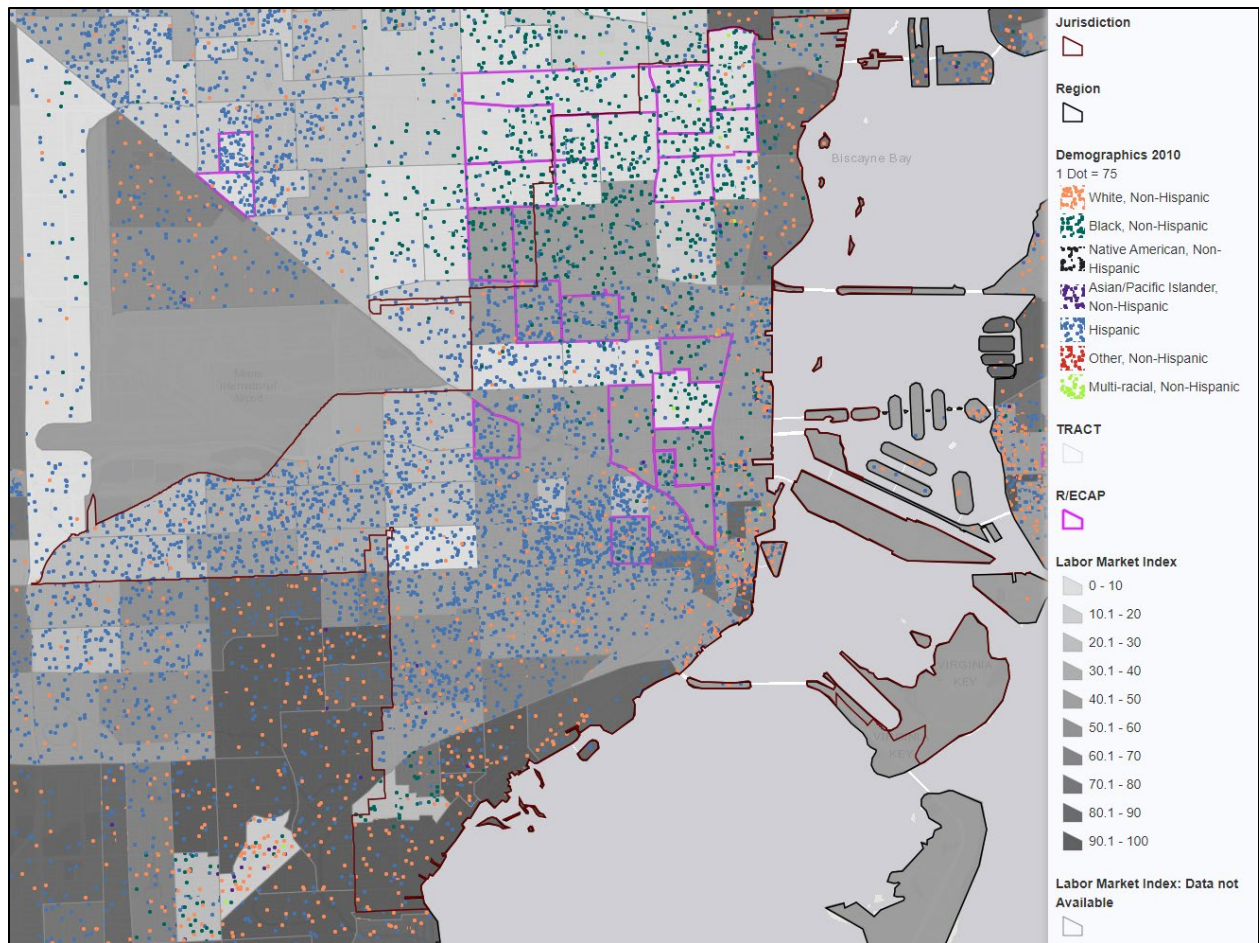
Florida Commerce reports that as of November 2023, the Miami-Miami Beach-Kendall metropolitan division (MD) had the highest over-the-year job gains (+49,800 jobs, +3.9%). When looking at the Job Proximity Index and Labor Market Index (HUD AFFH-T), higher scoring Census Tracts are concentrated in the south, and all along the coast of the city from north to south, with lower scores in the center and northern parts of the city, particularly within all of the R/ECAP areas.

Miami, FL CDBG Jurisdiction Labor Market and Jobs Proximity	
Labor Market Index	
Total Population	
White, Non-Hispanic	67.89
Black, Non-Hispanic	17.32
Hispanic	40.31
Asian or Pacific Islander, Non-Hispanic	64.08

Native American, Non-Hispanic	34.62
Population below Federal Poverty Line	
White, Non-Hispanic	52.31
Black, Non-Hispanic	15.34
Hispanic	34.29
Asian or Pacific Islander, Non-Hispanic	47.63
Native American, Non-Hispanic	64.93
Jobs Proximity Index	
Total Population	
White, Non-Hispanic	83.00
Black, Non-Hispanic	62.88
Hispanic	76.30
Asian or Pacific Islander, Non-Hispanic	83.15
Native American, Non-Hispanic	72.45
Population below Federal Poverty Line	
White, Non-Hispanic	80.38
Black, Non-Hispanic	63.34
Hispanic	74.88
Asian or Pacific Islander, Non-Hispanic	75.31
Native American, Non-Hispanic	85.64

Source: HUD AFFH-T tool, Table 12 – Opportunity Indicators by Race/Ethnicity, utilizing American Community Survey (ACS), 2011-2015; Longitudinal Employer-Household Dynamics (LEHD) data, 2017.

Self-employment is growing in Miami. According to a 2023 Chamber of Commerce study, six of the top ten cities in the United States with the highest self-employment rates are located in Florida, and the top 3 are all located within the Miami metropolitan area. Miami has the second highest self-employment rate at 18.9%, and Hialeah, a city neighboring Miami, ranked first with 20.3% of its workers self-employed. This lifestyle can be economically empowering for some individuals and families, but it can also be the cause of household struggle, as self-employed workers are also self-insured and self-reliant for their workspace and other needs. In Miami, the average annual salary of a self-employed worker is \$46,046 compared to \$54,625 for all workers in the city (ZipRecruiter.com).

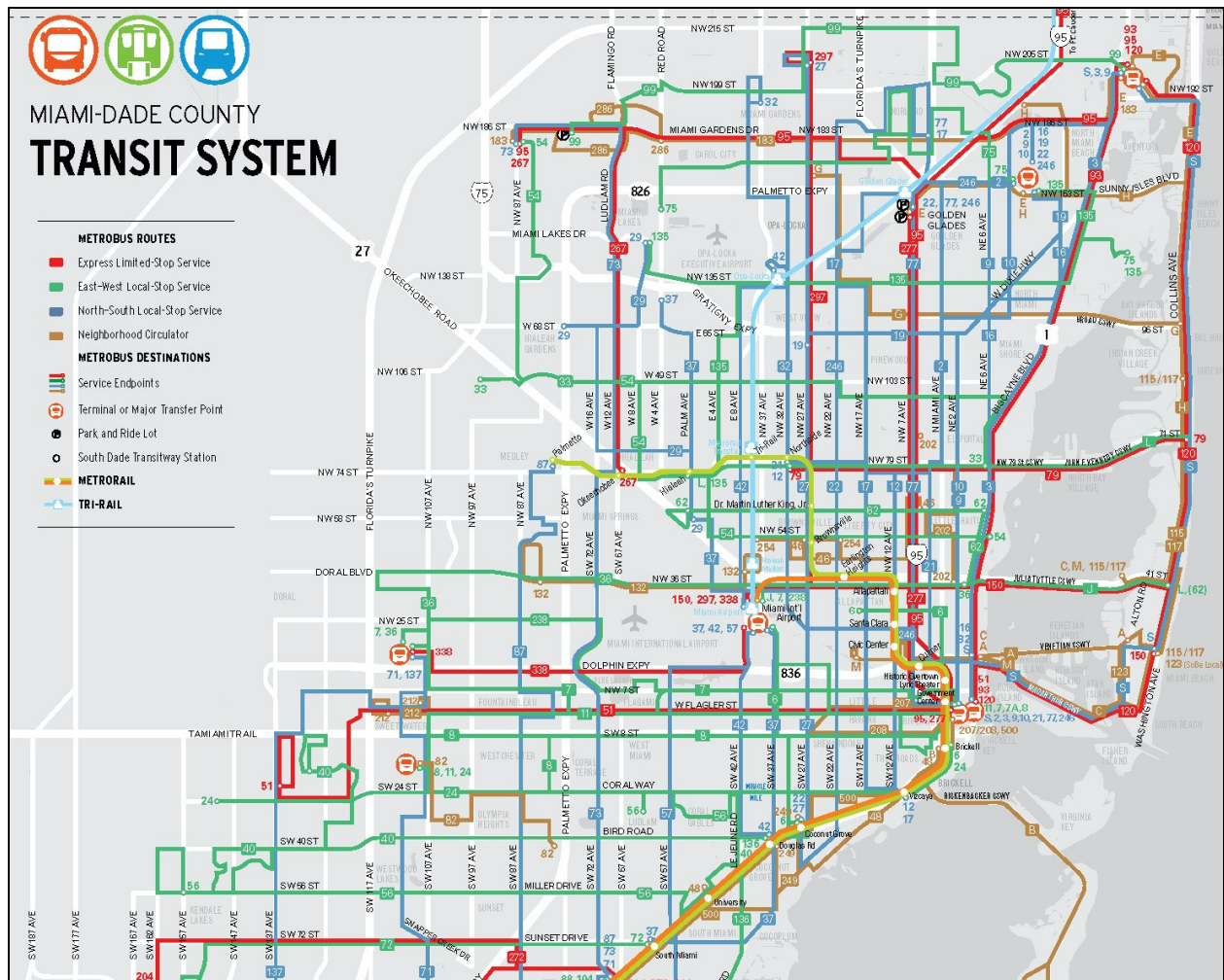


Source: HUD AFFH-T tool, Labor Market Index, utilizing Longitudinal Employer-Household Dynamics (LEHD) data, 2017.

Transportation

Access to transportation is often directly linked to poverty. Without access to reliable transportation, many individuals, specifically low-income persons and protected classes, are unable to obtain employment. Transportation is a critical component of achieving self-sufficiency. Disparities in access to transportation based on a place of residence, costs, or other related factors greatly decrease one’s ability to rise out of poverty.

In the tables below, Miami scores high all races and ethnicity within the Transit Index and Low Transportation Cost Index, suggesting that Miami area local governments and authorities have put significant investment into public transportation access. The map below shows many of the Miami-Dade County Transit System transit lines accessible throughout the city. Note that the map below doesn’t include all transit within Miami. The Miami Metromover is located between the Brickell and Omni neighborhoods downtown, and the City of Miami also operates a free smaller trolley system throughout 13 of the city’s main neighborhoods.



Source: Miami-Dade Transit on Twitter @IRideMDT

Public Transportation Usage and Costs

An analysis of the Transit Trips Index and Low Transportation Cost Index allows for the identification of disparities in access to transportation. According to the Transit Trips Index, the higher the value, the more likely residents in that neighborhood utilize public transit. The index controls for income such that a higher index value will often reflect better access to public transit. Transportation costs include fuel and parking fees and sometimes lodging, meals, and telephone expenses depending on the occupation. The higher the value, the lower the cost of transportation in that neighborhood.

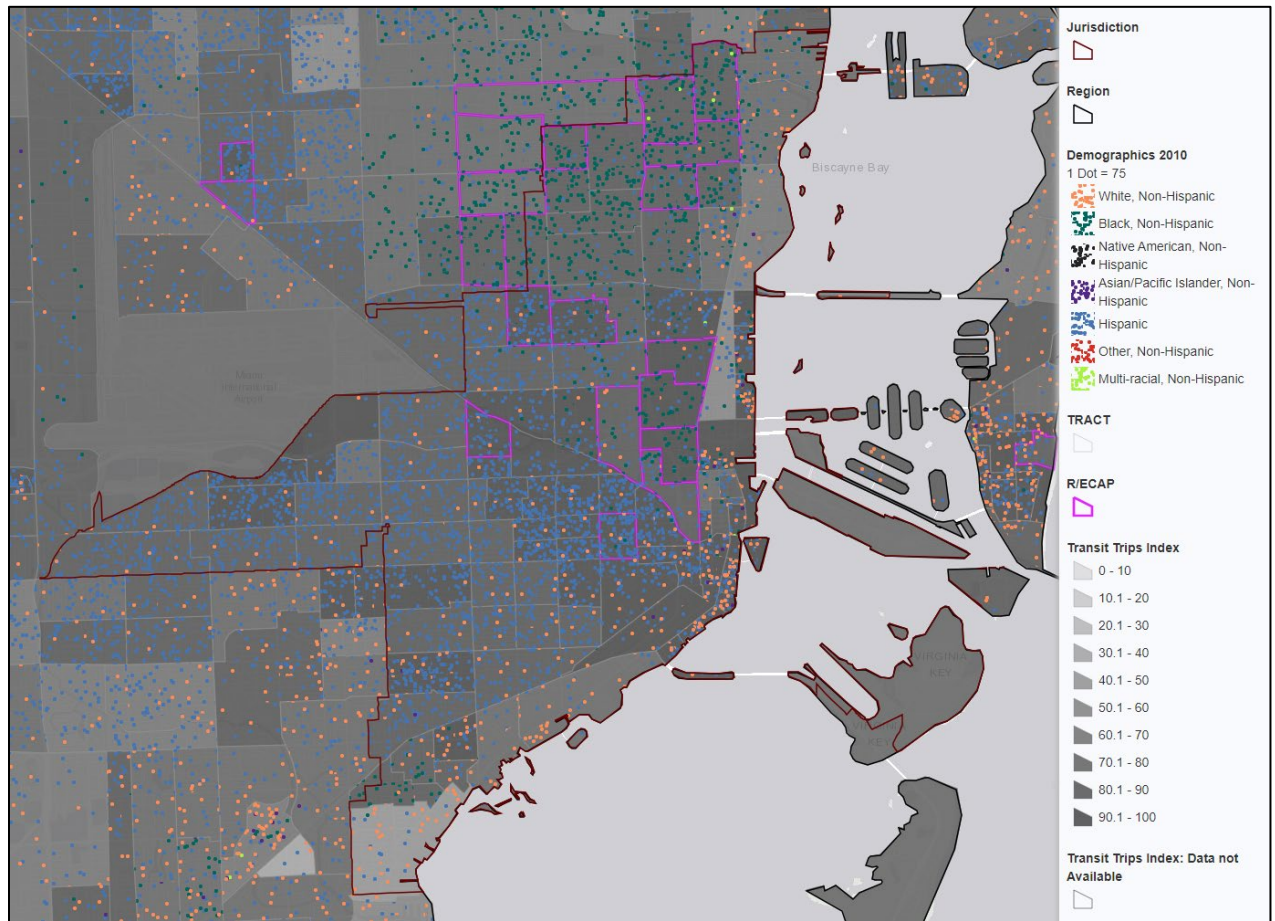
Both the Transit Trips Index and the Low Transportation Cost Index are high in the City of Miami, meaning many people use public transit and the cost for transportation is relatively low. Looking at transportation costs alone, there are slightly higher costs within the east-central part of Miami, particularly along the coast, and within the Midtown/Overtown/Downtown Corridor R/ECAP.

While public transit use is high for all race/ethnicities, individuals identifying as Hispanic (of any race) have the highest utilization rate at 89.94, followed by Asian or Pacific Islander and Native American. Public transit use is also high for Individuals of Cuban national origin in south central and southwest Miami, particularly within the Sewell Park (North) Quadrant and East Little Havana Corridor R/ECAPs and for families with children living in all R/ECAP areas.

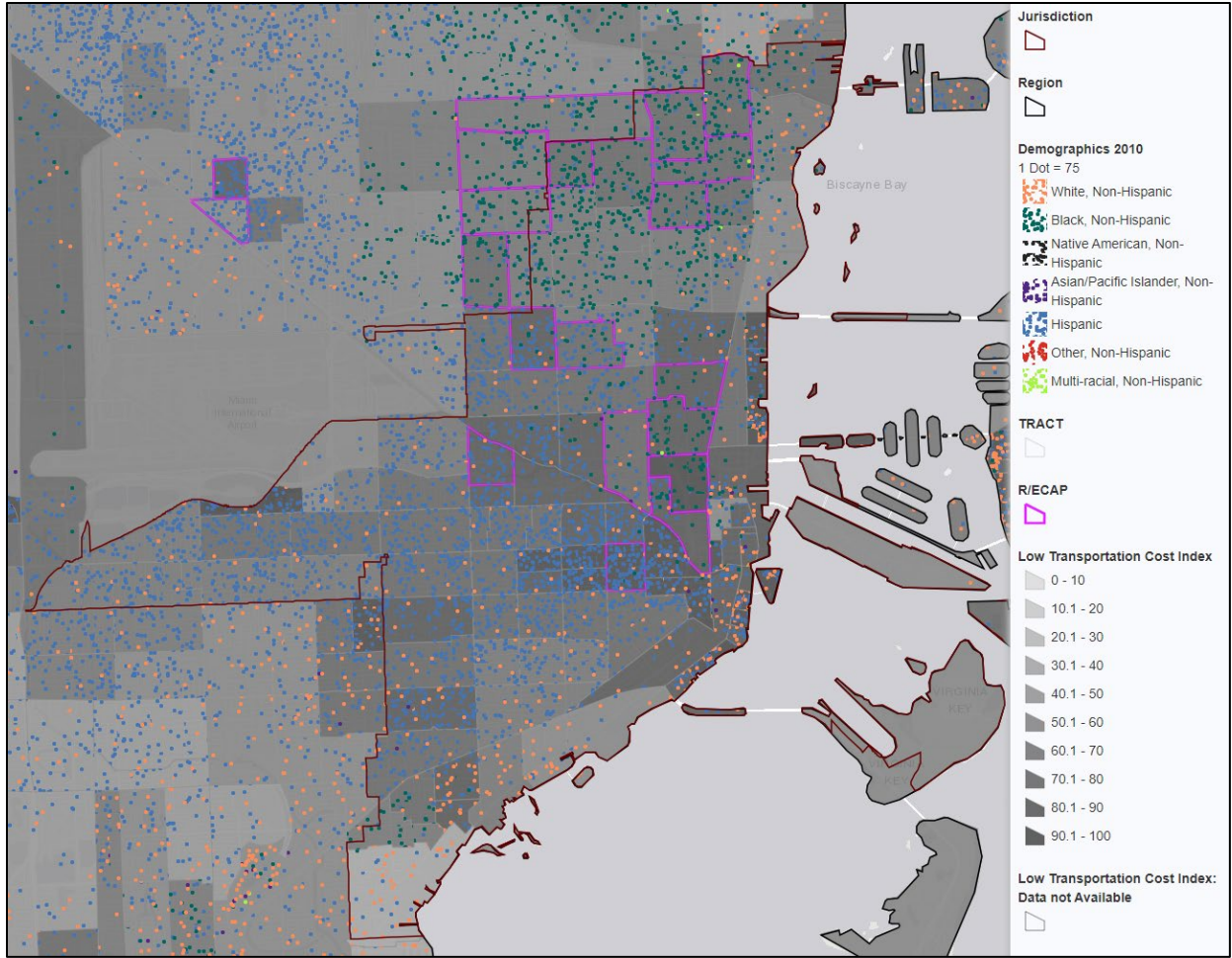
Individuals of Cuban national origin in south central and southwest Miami, particularly within the Sewell Park (North) Quadrant and East Little Havana Corridor R/ECAPs, experience lower costs to transportation in comparison to other national origins. Public transportation costs are also low for many families with children living within several R/ECAP areas. Least access to low transportation costs primarily affects Black, non-Hispanic.

Miami, FL CDBG Jurisdiction Transit Usage and Transportation Costs	
Transit Trips Index	
Total Population	
White, Non-Hispanic	87.38
Black, Non-Hispanic	86.76
Hispanic	89.94
Asian or Pacific Islander, Non-Hispanic	89.81
Native American, Non-Hispanic	89.39
Population below Federal Poverty Line	
White, Non-Hispanic	86.37
Black, Non-Hispanic	87.87
Hispanic	91.08
Asian or Pacific Islander, Non-Hispanic	86.74
Native American, Non-Hispanic	94.87
Low Transportation Cost Index	
Total Population	
White, Non-Hispanic	76.95
Black, Non-Hispanic	73.96
Hispanic	78.65
Asian or Pacific Islander, Non-Hispanic	80.30
Native American, Non-Hispanic	79.02
Population below Federal Poverty Line	
White, Non-Hispanic	76.07
Black, Non-Hispanic	75.38
Hispanic	80.47
Asian or Pacific Islander, Non-Hispanic	74.06
Native American, Non-Hispanic	86.13

Source: HUD AFFH-T tool, Table 12 – Opportunity Indicators by Race/Ethnicity, utilizing Location Affordability Index (LAI) data, 2012-2016.



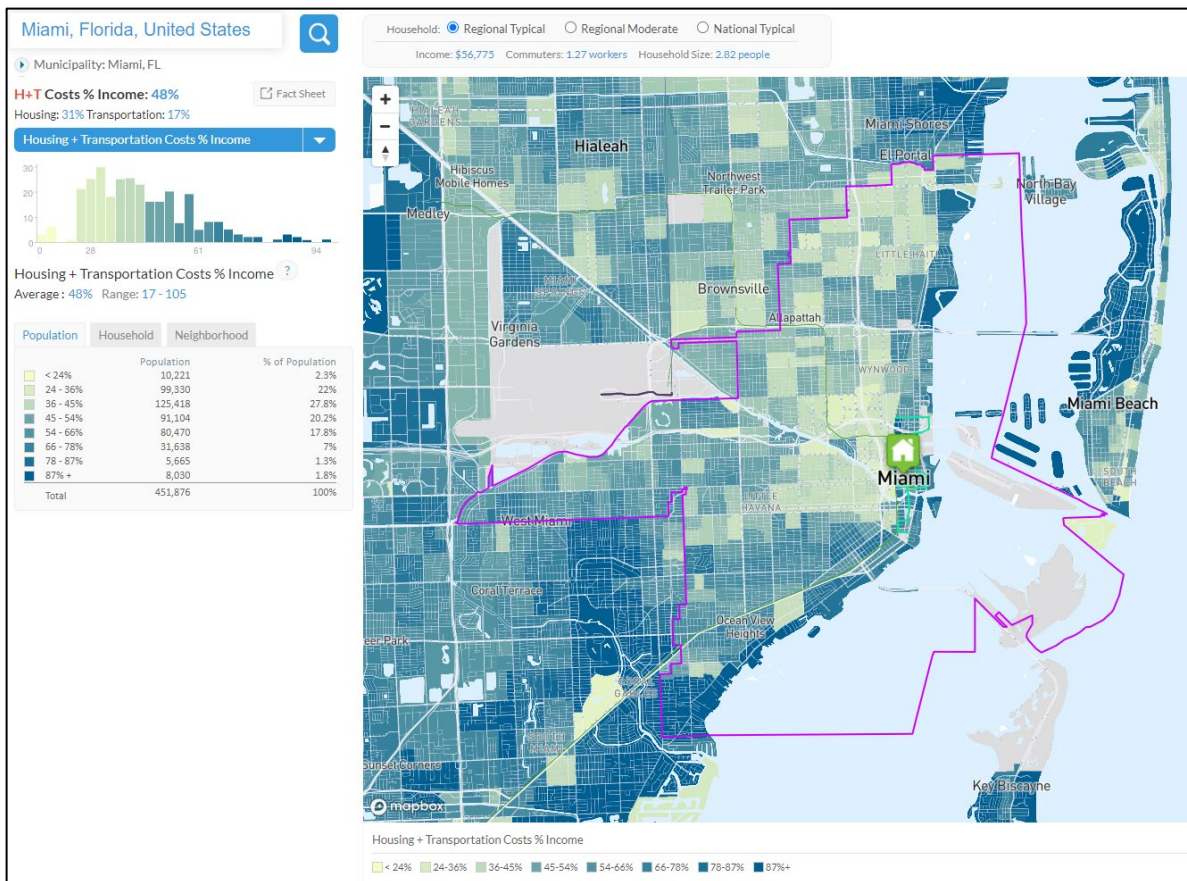
Source: HUD AFFH-T tool, Transit Trips Index, utilizing Location Affordability Index (LAI) data, 2012-2016.



Source: HUD AFFH-T tool, Transit Trips Index, utilizing Location Affordability Index (LAI) data, 2012-2016.

Housing and Transportation Index

Although there is relatively consistent access, the cost of transportation varies throughout the city. The H+T Index is a data source that provides a measure of housing and transportation affordability, as these are the two highest monthly expenses for most households. This can be viewed as a proxy for the cost of living. The cost of living is higher along the coast of Miami and in Miami's southern neighborhoods, and lower in the central and northern parts of the city.



Source: H+T Index, 2024.

Low-Poverty Exposure

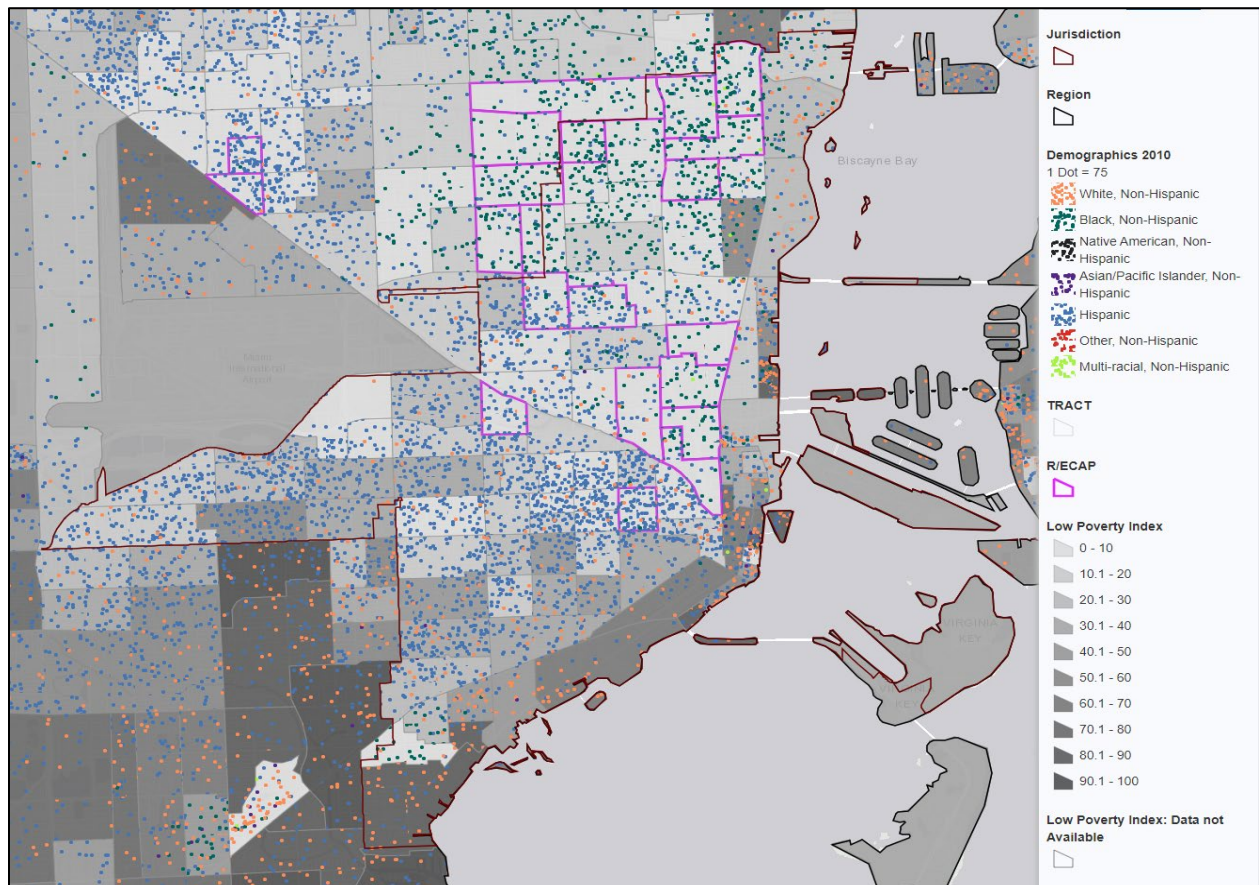
Families living in poverty face a range of challenges beyond those experienced by families living above the poverty line: difficulties in accessing good jobs, affording healthy foods, affordable transportation options, and access to both affordable and healthy housing. Ensuring the protected classes have access to low-poverty neighborhoods is essential to overcoming long-standing patterns of segregation for those of minority race/ethnicity, disability, and familial status.

The Low Poverty Index captures poverty in a given neighborhood. The higher the score, the less exposure to poverty in that neighborhood. Miami's Black population overall has a far lower Poverty Index Score than any of the other races/ethnicities, other than Native Americans below the federal poverty line. There are many areas across Miami that are greatly exposed to poverty, and those areas have high concentrations of Hispanic and Black households.

Miami neighborhoods experiencing the lowest rates of poverty include Coconut Grove, Brickell, Brickell Key, Venetian Islands, Downtown, Omni, Edgewater, and parts of Buena Vista and the Design District. Coastal neighborhoods have lower poverty overall. The southern part of the city also has overall lower poverty. High poverty neighborhoods include all of the neighborhoods with the R/ECAP Census Tracts, as well as the neighborhoods of West Grove, West Grapeland Heights, Auberndale, and neighborhoods within the south-central and northern part of the city.

Miami, FL CDBG Jurisdiction	
Low Poverty	
Low Poverty Index	
Total Population	
White, Non-Hispanic	42.74
Black, Non-Hispanic	9.76
Hispanic	22.75
Asian or Pacific Islander, Non-Hispanic	38.04
Native American, Non-Hispanic	18.35
Population below Federal Poverty Line	
White, Non-Hispanic	31.92
Black, Non-Hispanic	7.52
Hispanic	16.56
Asian or Pacific Islander, Non-Hispanic	27.64
Native American, Non-Hispanic	9.80

Source: HUD AFFH-T tool, Table 12 – Opportunity Indicators by Race/Ethnicity, utilizing American Community Survey (ACS), 2011-2015



Source: AFFH-T: HUD AFFH-T tool, Low Poverty Index, utilizing American Community Survey (ACS), 2011-2015.

Environmental Health

Clean air, stable climate, adequate water, sanitation and hygiene, safe use of chemicals, protection from radiation, healthy and safe workplaces, sound agricultural practices, health-supportive cities and built environments, and a preserved nature are prerequisites for good health, according to the World Health Organization. The higher the index value, the less exposure to toxins harmful to human health. The higher the value, the better the environmental quality of a neighborhood.

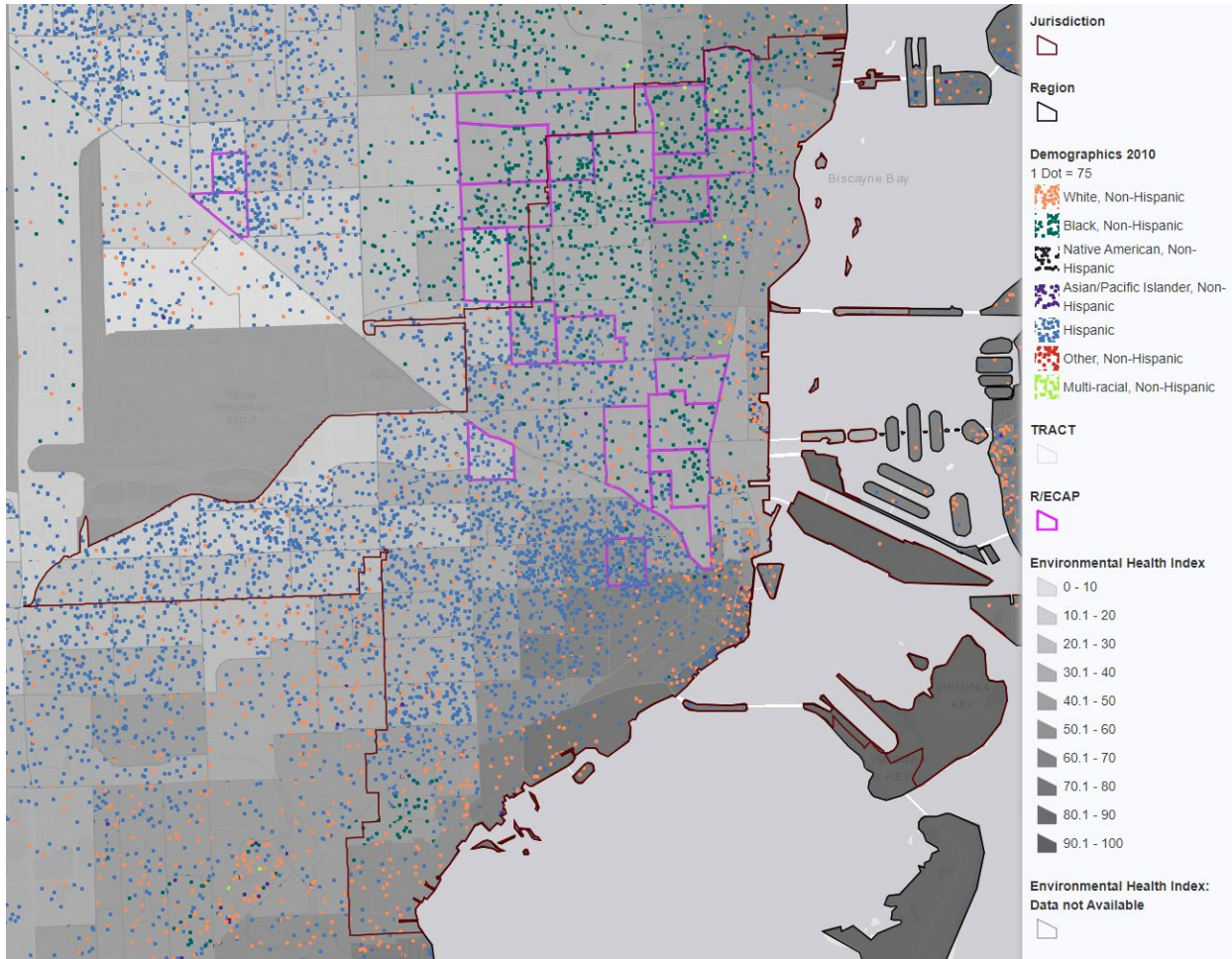
Based on the Environmental Health Index, the residents of Miami seem to have an average risk of exposure to toxins. Hispanic and Black households generally have a slightly higher risk of being exposed to environmental toxins while Non-Hispanic White and Asian/Pacific Islander households generally have a slightly lower risk. Interestingly, Native Americans below the poverty line also have a slightly lower risk of exposure due to their geographic location.

Qualitative data also identified flooding as a top environmental risk in Miami. Miami’s flooding has grown worse over the years with both rainstorms and sunny-day King Tide flooding, impacting neighborhoods like Brickell where previously flooding did not occur. Sea level rise in the past several decades – almost six inches in the last 25 years – along with warming temperatures and stronger, more frequent rainstorms were cited as possible causes of new flooding. Miami leadership stated that the city has identified over 50 flooding hotspots and identified 16 of the worst reoccurring locations. The city also installed a new pump on North Bayshore Drive, is working with FDOT on a new pump station project on Biscayne Blvd. between NE 10th and 15th Streets, made new hires to the Department of Resilience and Public Works to run high-powered vacuums, and is working to clean the city’s clogged drain system to address flooding.

Miami, FL CDBG Jurisdiction Environmental Health	
Environmental Health Index	
Total Population	
White, Non-Hispanic	50.14
Black, Non-Hispanic	41.33
Hispanic	40.34
Asian or Pacific Islander, Non-Hispanic	48.50
Native American, Non-Hispanic	42.69
Population below Federal Poverty Line	
White, Non-Hispanic	45.58
Black, Non-Hispanic	40.96

Hispanic	40.21
Asian or Pacific Islander, Non-Hispanic	42.48
Native American, Non-Hispanic	52.73

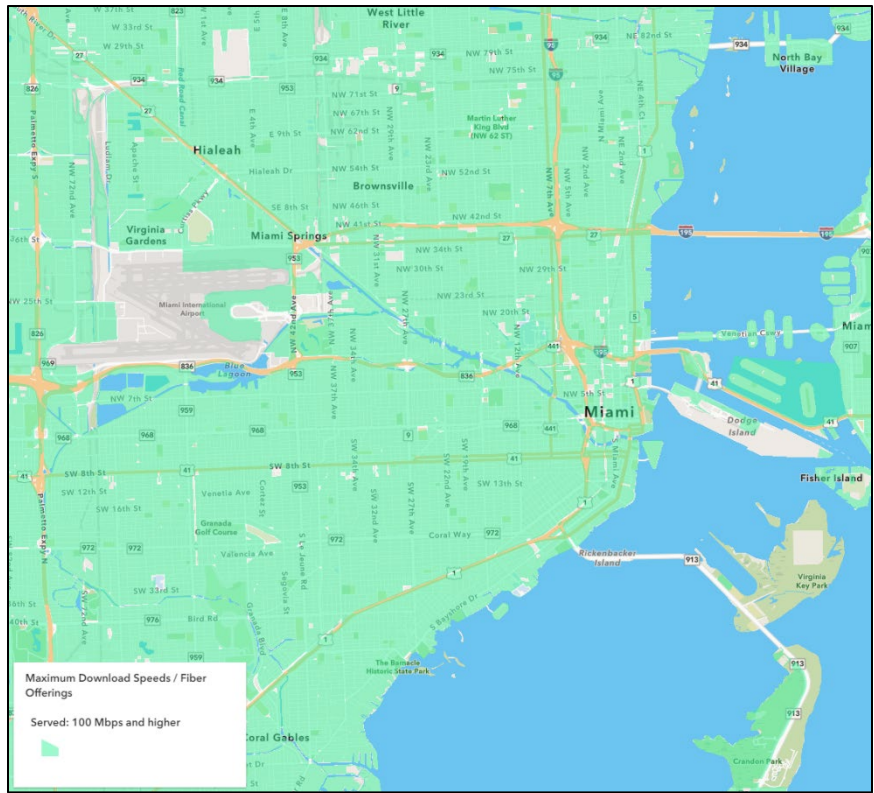
Source: HUD AFFH-T tool, Table 12 – Opportunity Indicators by Race/Ethnicity, utilizing National Air Toxics Assessment (NATA) data, 2014.



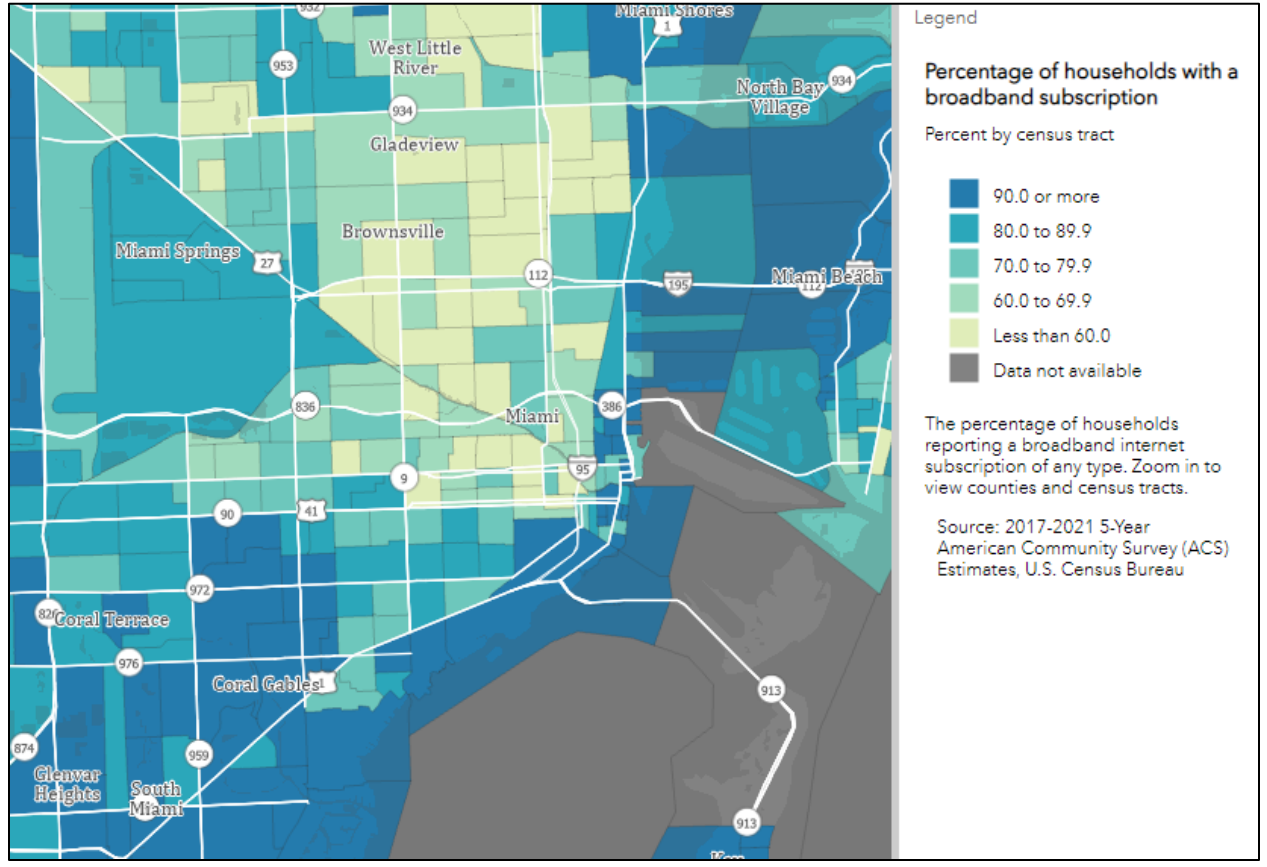
Source: HUD AFFH-T tool, Environmental Health Index, utilizing National Air Toxics Assessment (NATA) data, 2014.

Broadband Access

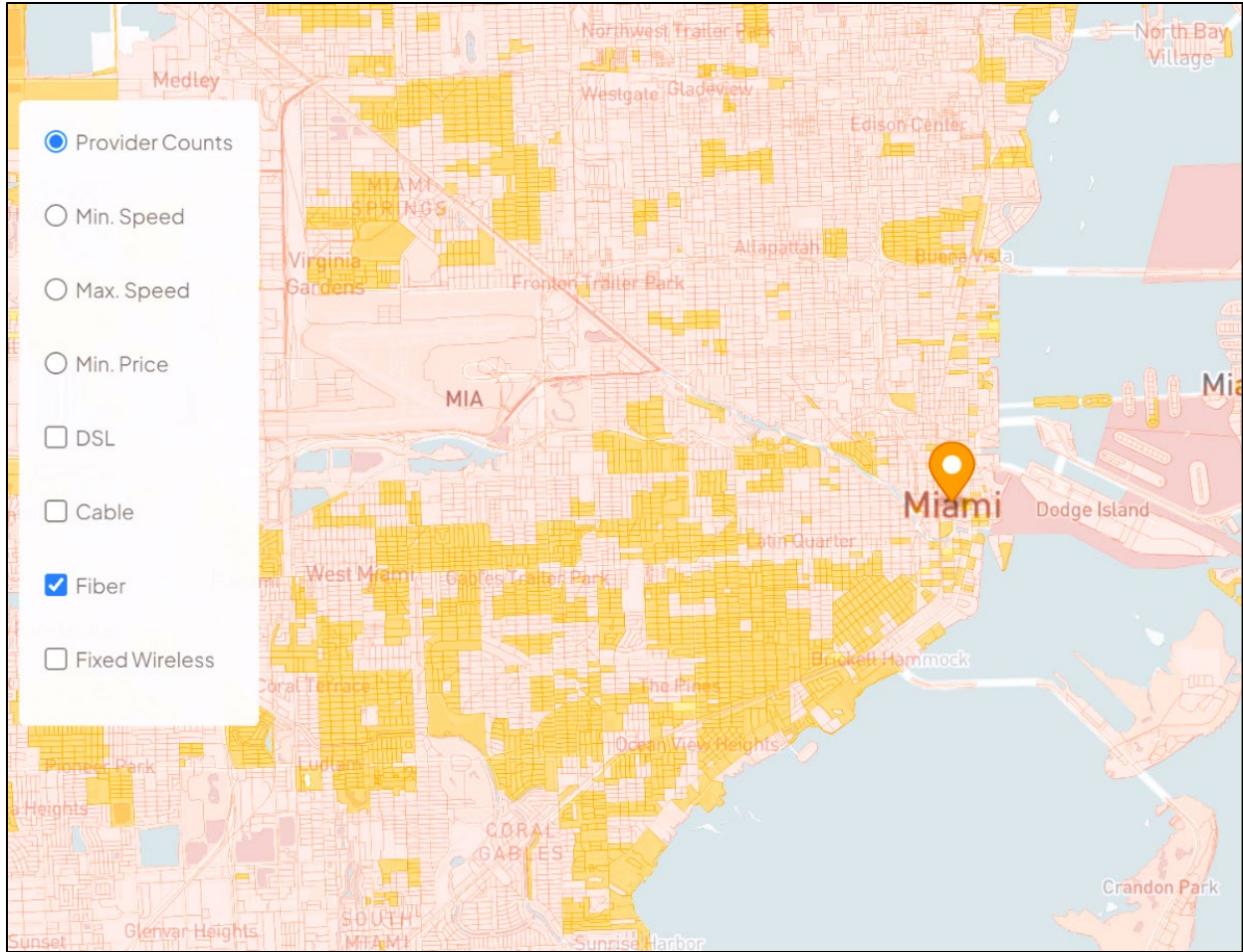
When it comes to the digital divide in Miami, broadband access of 100 Mbps and higher is readily available citywide, facilitated by 25 different providers, as reported by Broadband Search. Nevertheless, subscription rates for broadband internet services are lower in central and northern Miami. Furthermore, fiber optic internet remains limited to certain neighborhoods, primarily those in the southern regions of the city.



Source: Florida Commerce, Faster Florida Broadband Map, 2024.



Source: U.S. Census Bureau, Telecommunications and Information Administration, Access Broadband Dashboard, based on ACS 2017-2021 5-Year Estimates.



Source: Broadband Now, National Broadband Map, utilizing FCC’s Form 477 bi-annual deployment information, 2024.

Accessibility

As shown in the table below, most of the individuals with disabilities in Miami have ambulatory difficulties, meaning they have an impairment that prevents or impedes their ability to walk. Individuals with ambulatory difficulties may be wheelchair-bound and/or use walking aids such as walkers and canes. Because of this, these individuals may have difficulty locating accessible housing, entering buildings, maneuvering in small spaces, and obtaining accessible transportation.

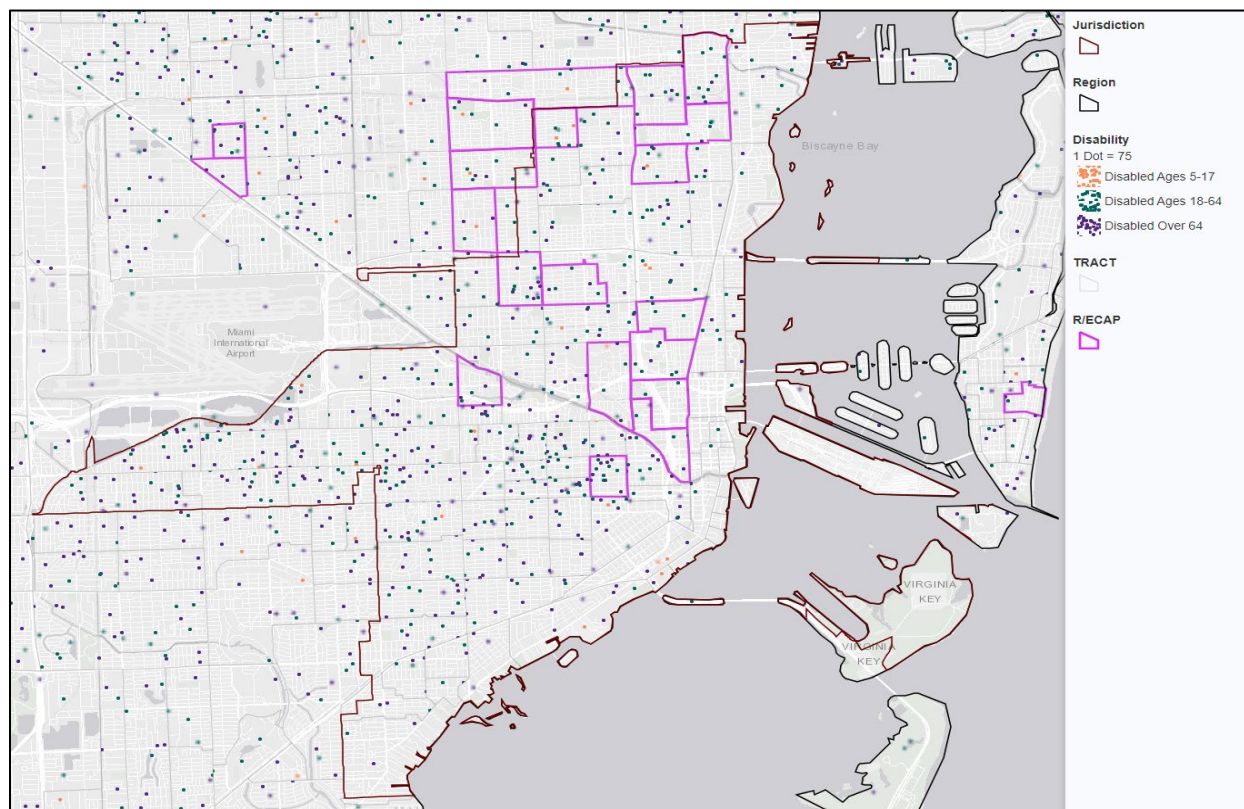
Disability by Type in Miami, FL		
Disability Type	#	%
Hearing difficulty	9,335	2.39%
Vision difficulty	9,875	2.52%
Cognitive difficulty	23,265	5.95%
Ambulatory difficulty	30,505	7.80%

Self-care difficulty	13,035	3.33%
Independent living difficulty	23,210	5.93%
Note 1: All % represent a share of the total population within the jurisdiction or region.		

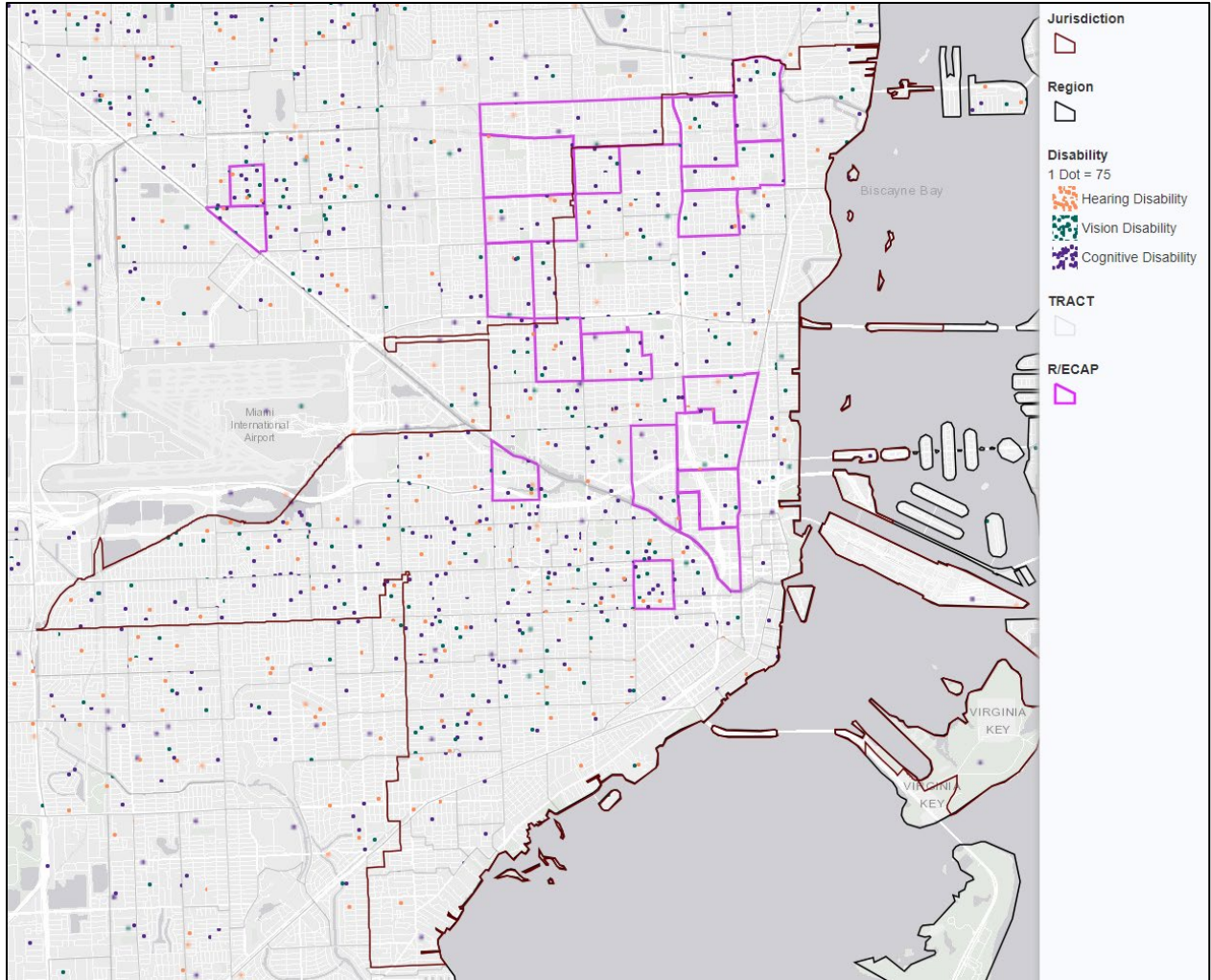
Source: ACS 2022 Five-Year Estimates

Disability by Age Group in Miami, FL		
Age of People with Disabilities	#	%
Age 5-17 with Disabilities	2,330	0.60%
Age 18-64 with Disabilities	24,275	6.20%
Age 65+ with Disabilities	25,525	6.52%
Note 1: All % represent a share of the total population within the jurisdiction or region.		

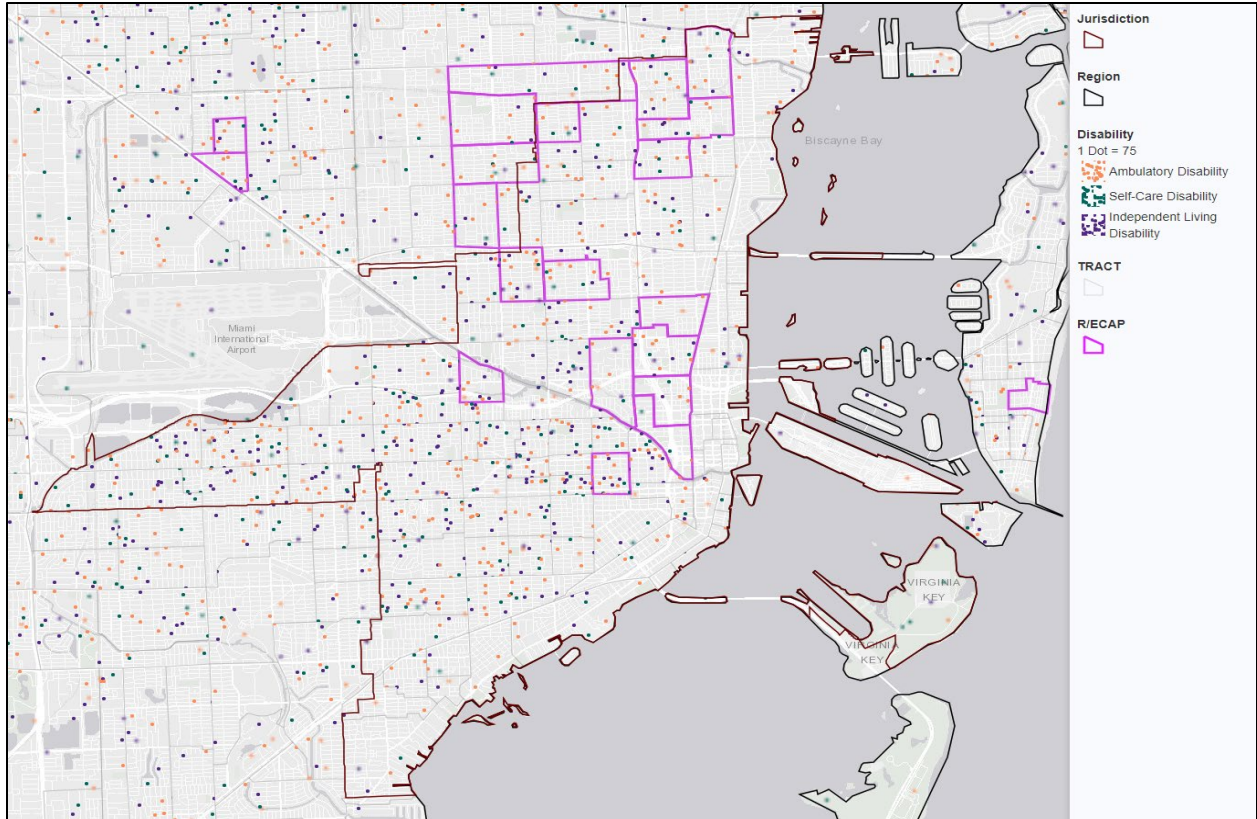
Source: ACS 2022 Five-Year Estimates



Source: HUD AFFH-T tool, Disability by Age Group, utilizing American Community Survey (ACS), 2011-2015; Inventory Management System; (IMS)/ PIH Information Center (PIC), 2019; and Tenant Rental Assistance Certification System (TRACS), 2019.



Source: HUD AFFH-T tool, Disability by Type: Hearing, Vision, and Cognitive Disability, utilizing American Community Survey (ACS), 2011-2015; Inventory Management System; (IMS)/ PIH Information Center (PIC), 2019; and Tenant Rental Assistance Certification System (TRACS), 2019.



Source: HUD AFFH-T tool, Disability by Type: Ambulatory, Self-Care, and Independent Living Disability, utilizing American Community Survey (ACS), 2011-2015; Inventory Management System; (IMS)/ PIH Information Center (PIC), 2019; and Tenant Rental Assistance Certification System (TRACS), 2019.

Access to Affordable Housing for Individuals with Disabilities

Data has shown a severe lack of affordable, accessible, and inclusive housing for individuals with disabilities who are more than twice as likely to be low-income. Reasons for lack of access to affordable housing include low inventory of units suitable for accessible living and the costs of retrofitting a home to accommodate accessibility. Inequitable housing policies and limited housing assistance are also barriers to accessing accessible and affordable housing.

There are federal, state, and local programs, particularly for seniors with disabilities, that can assist and are currently serving individuals with disabilities in the City of Miami.

Disability by Publicly-Supported Housing Program Category		
City of Miami	People with a Disability	
Program	#	%
Public Housing	2,730	53.75%
Project-Based Section 8	541	21.92%
Other Multifamily	39	4.81%

HCV Program	2,352	39.68%
Miami-Fort Lauderdale-West Palm Beach MSA		
Program	#	%
Public Housing	4,217	40.27%
Project-Based Section 8	1,847	14.49%
Other Multifamily	212	6.18%
HCV Program	N/a	N/a
Note 1: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.		

Source: HUD AFFH-T tool

Miami-Dade Public Housing Authority's HCV Resident Demographics	#	%
Disability		
Disabled and 62 and over	6,647	34.53%
Disabled and Under 62 of age	2,259	13.14%
Non-disabled	10,075	52.33%

Source: HUD AFFH Tool

Access to Broadband and Government Services for Individuals with Disabilities

The City of Miami has an Americans with Disabilities Act (ADA) webpage on their public website with information on ADA requirements, ADA request forms, and information on how to request a sign language interpreter. This page includes the city's non-discrimination policy and public notices language, a link to the city's non-discrimination plan, information about service animal regulations, and complete contact information for the city's ADA Coordinator/Safety Officer, and Title VI Liaison. The city website also has a bright pink "Personalization Options" widget on every webpage where a user can choose font size, change the contrast, add audio and alternative text, and select other accessibility options. The widget also provides a translation feature where the user can choose between English, French, and Spanish. These features make access to the City's web-based services and outreach more accessible to underserved populations.

Access to Transportation for Individuals with Disabilities

Individuals with disabilities in the City of Miami can request on-demand transportation on the city's website. A phone number to make reservations for the service is provided, which can be utilized after the person has applied and been approved to use the service. Applicants must be low-income and either over the age of 65 or disabled as defined by the Americans with Disabilities Act of 1990. Reservations must be made up to 24 hours in advance and trips can be no further than five miles in distance. The city prioritizes trips to senior centers providing hot meals and places for food procurement, government facilities, and medical facilities.

Miami-Dade runs the Special Transportation Service (STS) in compliance with the ADA's paratransit requirement. A national paratransit provider, Transportation America, is contracted to manage and operate over 400 vehicles in the STS fleet. The STS provides door-to-door service throughout most of Miami-Dade County for \$3.50 per one-way trip. Individuals with disabilities must apply to utilize the program. Once approved, certified STS riders can also use Metrobus and Metrorail free of charge.

The STS provided rides to 1.3 million individuals in 2022. The county reported receiving an average of 17 complaints per day in 2022 about the STS, which is a relatively low complaint rate of about 0.5%, and 14 complaints per day in 2021. Complaints were mostly about late drivers, no-shows, and drop-offs at the wrong locations. Paratransit vehicles must drive in regular traffic, meaning daily traffic delays can have a significant impact on their reliability. Information on how to make an ADA complaint, and how to appeal decisions about an application for the city and county-run services is available on the city and county websites. The county has a process to address issues and works closely with clients to address them. As of April 2023, the STS extended service hours for trip reservations to 6:00 a.m. to 6:00 p.m., added stand-by vehicles to minimize service delays, added personnel, and allows scheduling flexibility up to one hour before or after the requested time.

Freebee and MetroConnect provide free rides to people with mobility devices. MetroConnect provides services in the Miami Civic Center zone located mostly in Brickell, Monday through Friday, 6:30 a.m. to 7:00 p.m., and is run by Miami-Dade County. Freebee is a free on-demand door-to-door service with several service areas around the city, including Coconut Grove, Coral Gables, Waterford Business District south of the Miami International Airport, and Downtown Miami. Hours for Freebee vary by zone but are typically seven days per week from morning to evening. To use these services, a rider must have access to smartphones and have the ability to download and use the company's phone application. Accessible vehicles must be specifically requested.

Medicare recipients are eligible to apply for Miami-Dade County's Discount Fare EASY Card. With this card, they are eligible for reduced fares for Metrobus (\$1.10), Metrorail (\$1.10), Metrobus Express (\$1.30), and Metrobus Shuttle (free), and reduced prices for one-day (\$2.80), seven-day (\$14.60), and one-month (\$56.25) passes.

Access to Education for Individuals with Disabilities

Education and support services are common barriers for individuals with disabilities, and they often have limited employment options. Often, educational programs specific to individuals with disabilities are obtained through service providers. Most public schools do not have the capabilities or tools to sufficiently serve this population.

The Miami-Dade Public Schools website has the entity's Accessibility Statement in a tab on the bottom of the home page, and an accessibility widget where font sizes, colors, and other features

can be changed to make the website more accessible. Services including school choice assistance, assistance for students with autism, and assistive technology devices are provided through the Exceptional Student Education (ESE) department, in partnership with the Florida Diagnostic and Learning Resources System-South (FLDRS-South). ESE has a website with information for parents of students with disabilities, including information on the emotional/behavioral disabilities program, in-school nursing, physical therapy, speech and language services, dyslexia and autism resources, programs for the visually impaired, and more.

Project SEARCH Miami (PSM) is a one-year School-To-Work Transition Program designed for students (18-22 years of age) with disabilities who are pursuing employment. The program is a collaboration between Miami-Dade County Public Schools and the Sandra DeLuca Developmental Center, a Division of the City of Miami's Parks and Recreation Department. The Sandra DeLuca Developmental Center (SDDC) complies with Federal and State Laws and Regulations that govern the care of individuals with developmental disabilities. The SDDC is located at 4560 NW 4th Ter Miami, FL 33126 in the Flagami neighborhood.

Access to Supportive Services for Individuals with Disabilities

Miami-Dade's Homeless Continuum of Care is the Miami-Dade County Homeless Trust. The Homeless Trust administers and oversees competitive and dedicated funds and implementation activities, including over 100 housing and services programs operated by over 20 competitively selected non-profits and government entities. The Trust also provides a resource guide which includes information on assistance programs available in the county, including animal care services, dental services, immigration services and more. The resource guide has a section dedicated to services for individuals with disabilities. This section provides information on 23 programs available to people in Miami, including key disability-focused organizations like the local Agency for Persons with disabilities, the Center for Independent Living of South Florida, and the Disability Rights Florida Information and Referral Unit.

Economic Development

Qualitative data identified low wages and a need for job training programs as their top employment issues for underserved communities in the City of Miami. The city's 2019-2023 Consolidated Plan found that its employed population 16 years and older is primarily employed in "educational services, health care and social assistance" (16.2 percent) followed by "arts, entertainment, and recreation and accommodation and food services" (15.2 percent). These are low wage sectors with wages near or below minimum wage.

As noted in the Access to Affordable Housing section of this AI report, concentrations of Black residents, poverty, and health and wellness indicators today align very closely with the Homeowners Loan Corporation (HOLC) redlined neighborhoods of the 1930s. Redlined neighborhoods in north-west and north-central Miami are where most of the R/ECAP with high unemployment and a low Labor Index score are located. Unemployment and Labor Market Index

scores are lowest in the Liberty City/Model City Corridor, the Little Haiti Corridor, and in Census tracts 31003, 31002, and 30001 of the Midtown/Overtown/Downtown Corridor.

Three Community Redevelopment Areas (CRAs) are located within the City of Miami: Midtown Miami CRA, Omni CRA, and Southeast Overtown/Park West CRA. These CRAs are clustered near downtown Miami where existing land use regulations and development provide potential for growth of housing, public services, transportation services, and jobs. The neighborhoods located within the boundaries of these CRAs have access to tax increment financing (TIF) revenue and corresponding Redevelopment Plans, adding an additional layer of planning for growth.

Due to revitalization efforts of the Omni CRA, areas of this district like the Arts and Entertainment District, Wynwood, and South Edgewater have seen significant growth and are economically thriving. Other neighborhoods within this CRA, including parts of Overtown and South Wynwood, have seen slow growth, in part due to industrial land use in those areas. The Omni CRA recently expanded west to incorporate the Allapattah neighborhood, and east to incorporate more of the Watson Island neighborhood. The Omni CRA 2023 Redevelopment Plan identifies the need for mixed-income housing, small business retention, and overall beautification in Allapattah, and pedestrian connections and infrastructure improvements in Watson Island.

LOCAL AND STATE POLICIES AND PRACTICES IMPACTING FAIR HOUSING

Introduction

Government regulations including land use/zoning codes and building codes adopted by a jurisdiction have the potential to impact the cost of housing and limit the supply of affordable housing, which impedes fair housing choice. Recognizing institutional, regulatory, or policy barriers to development and promotion of access to affordable housing is important to determine effective strategies for mitigating fair housing issues.

Impact of Zoning and Site Selection on Affordable Housing

The City of Miami implements zoning through a form-based code (Miami 21) with zones T-3 (more suburban development style) to T-6 (more urban development style) with additional zones for workplace, industrial, waterfront industrial, and civic institution health districts, as well as special district regulations laid out in the appendices of the code. Areas of the city in the Rapid Transit Zone (RTZ) defined in Miami-Dade County's zoning regulations are also subject to regulations associated with that zone.

The local T-4 through T-6 zones promote housing options since they are generally more permissive. Regulatory highlights include the following, some of which could be evaluated for further expansion to zones where they are not currently applicable:

- Permissive density and housing type allowances;
- Minimum height requirements in T-5 and T-6;
- Residential parking reduction in zones T-4 through T-6 via shared parking reductions and reductions in transit-oriented development or transit corridor areas, in addition to general parking reductions for housing for low-income households and the "elderly" (which require approval processes above and beyond the by-right approval process);
- Co-living allowances in T-5 and T-6 zones; and
- Public benefit and housing benefit programs that provide floor-lot-ratio, height, density, parking, and other incentives in exchange for affordable/workforce housing units.

Several special districts promote transit-oriented development and other high-density mixed-use development, including a public benefits program specific to the Wynwood area with incentives for workforce housing.

RTZ regulations are also relatively permissive and in certain cases include mandatory inclusionary housing requirements for affordable units, with the caveat that within the RTZ, the SMART

Corridor Subzone regulations that apply within municipalities exclude areas zoned for or developed with single- and two-family housing that is not part of a mixed-use development.

The downtown areas of Miami, well-resourced areas, and other thoroughfares throughout other parts of the city have relatively permissive zoning allowances. The more restrictive T-3 zoning intended for low-density, single family or twin-home development remains prevalent across portions of the city which may limit options for increasing access to an affordable and diverse housing stock, particularly outside R/ECAP areas. Most T-3 zoned sites were developed many years ago and the city has limited developable land. Recognizing this, there may be an opportunity to consider upzoning as a targeted approach or to align with Miami-Dade county's SMART Corridor approach to support access to affordable housing in the historically low-density T-3 zones.

Outside of restrictive zoning, additional indirect barriers on housing types and density may limit housing choice. These barriers may impact unit production, particularly where multi-family is allowed but also in single-family home areas if there are small lots where building or rehabilitation is constrained due to restrictive land development regulations and where ancillary units (accessory dwelling units) and co-living are not currently allowed.

Land Use Regulations

Areas in the SMART Corridor Subzone of the RTZ that are not in certain areas designated as Urban Center are governed by mixed-use policies in the county's Comprehensive Development Master Plan and associated land development regulations in the Code of Ordinances. Since the county's zoning map indicates that the designated Urban Centers are located outside of Miami, regulations applying outside these areas are summarized below:

- For areas outside the Urban Center zoning districts but within an Urban Center radius defined by the CDMP, there are minimum FAR requirements and permissive density maximums; additionally, there are minimum densities for residential development near proposed or existing rapid transit stations.
- For SMART Corridor subzone lands inside Rapid Transit Activity Corridor but outside the designated Urban Center radius, there are minimum FAR requirements and a height bonus for workforce housing units (WHUs): "Notwithstanding any provision to the contrary, in accordance with Article XIIA of Chapter 33, the Director may approve an increase of two additional stories about the maximum allowable height to accommodate development of WHUs, subject to compatibility and other building placement and design standards set forth in this section"

Regarding station areas, there are additional RTZ regulations for non-Metrorail development around certain stations within the City of Miami (Sec. 33C-8 of Miami-Dade Code of Ordinances). These regulations include minimum mixed-use requirements, which when development includes

residential, include an inclusionary housing mandate: “All residential or mixed-use developments, including those which obtained LEED or similar organization certification, located within any of the Rapid Transit Zones, with more than 4 residential units, shall provide a minimum of 12.5% of their units as work force housing units.” There are also specific RTZ subzones for certain station areas promoting additional transit-oriented development via permissive allowances relative to single-family zoning areas.

In contrast to these areas with more permissive regulations, and in some cases, explicit affordable housing requirements, the city’s local T-3 zone is the most restrictive in terms of housing type; it does not permit multi-family housing, and certain subzones do not permit duplexes. This zone also has the most restrictive density allowances and other applicable land development regulations restricting how much housing can be built. Public benefit and housing benefit incentive programs in the Miami 21 code do not apply in T-3 zones. This zone is still prevalent in the city, creating a barrier to providing additional housing in these areas.

Minimum Lot Sizes

Minimum lot sizes restrict the number of units that can be built in areas zoned for single-family units and possible subdivision of lots for additional infill development. The T-3 zone currently has a minimum lot area of 5,000 square feet.

Setbacks and Max Lot Coverage

City regulations include setback and max lot coverage requirements, which can generally limit the buildable area on a site. There may be marginal adjustments possible to the current regulations that may facilitate further housing unit production. These regulations should be coordinated with stormwater management needs.

Ancillary Unit Allowances

Ancillary units are not currently allowed in all zones where single-family homes are allowed, limiting opportunities to provide additional units everywhere that a single-family home might be built.

Co-Living Allowances

Co-living defined as “Communal living quarters consisting of Co-Living Rooms each with a private bathroom and shared unit space including full kitchen facilities with direct access to the outside or a common hall” provides an additional housing type option for sharing a residence. This option is only allowed in zones T-5 and T-6.

On-Site Open Space Requirements in T5 and T6

Open space needs could potentially be met through accessible public parks and open space, allowing more buildable area on private development sites in conjunction with other requirements affecting buildable area.

Regulatory Incentives

In addition to building incentives offered via previously mentioned public and housing benefit programs, general regulatory incentives offered, but lacking specific locational criteria that would facilitate these developments in well-resourced areas, include:

- Impact fee deferrals and waivers, as well as waiver of the air quality fee in the Southeast Overtown/Park West Development area and interim proprietary and general service fee;
- Flexibility with tree protection bonds and tree replacement requirements;
- Alternative standards for green building; and
- Required incentives of the State Housing Incentives Partnership (SHIP) program (Florida Statute 420.9071(18)): expedited permitting and an ongoing review process of local policies, ordinances, regulations, and plan provisions that increase the cost of housing prior to their adoption.

Live Local Act Land Use and Tax Exemptions

The Live Local Act was signed into State law in March 2023. Among other provisions, it included new land use-related preemptions and authorization of tax exemptions to increase affordable housing production. These provisions may affect the location and siting of affordable housing in the city, but do not have any explicit locational criteria for their use with regards to well-resourced and under-resourced areas.

Land Use Standards

Preempts local use, density, and height standards for multi-family or mixed-use rental development in any area zoned for commercial, industrial, or mixed use and in which at least 40% of units are affordable for households up to 120% AMI for at least 30 years. The development must be administratively approved if it meets multi-family land development regulations of the city and is consistent with the comprehensive plan. There are additional conditions for cities and certain multi-county independent special districts with less than 20% of land designated for commercial and industrial use. Projects eligible for this tool are entitled to the following standards:

- Use: allowed to build multifamily rental or mixed-use in commercial, industrial, or mixed-use zones without a zoning or land development change
- Density: highest density allowed on any land in the City or County where residential development is allowed

- Height: highest currently allowed height for a commercial or residential development within 1 mile of the proposed development or 3 stories, whichever is higher

Local Option for Affordable Housing Property Tax Exemption

Authorizes local governments to provide property tax exemptions for specified affordable housing developments that contain 50 or more units, at least 20% of which are affordable to households at or below 60% AMI; the exemption applies to affordable units only. The amount of exemption is based on the share of units that is affordable. The city has not currently adopted this optional tax exemption.

Tax Exemption for Nonprofit Land Use for Affordable Housing with a 99-Year Ground Lease

Applies to land (excluding improvements) owned entirely by nonprofit that is leased for a minimum of 99 years and is predominantly used to provide affordable housing to households up to 120% AMI; “predominantly used” means that square footage of improvements on the land for affordable housing is greater than 50% of all the square footage of improvements. This section of State statutes already allowed a tax exemption for property owned entirely by a non-profit used to provide affordable housing at moderate incomes and below.

“Missing Middle” Property Tax Exemption

Applies to newly constructed multi-family developments that have more than 70 affordable units for households up to 120% AMI; tax exemption only applies to affordable units. Exemption amount is tiered based on income brackets served.

Policy Impact on Equitable Access to Homeownership

Land Use and Zoning Policies

The City of Miami adheres to both federal law (Fair Housing Act) and Miami-Dade County’s Code to define unlawful housing practices. Miami-Dade County’s civil and human rights ordinance, codified as Chapter 11A, (Article II, Sec. 11A-12) of the Miami-Dade County Code (as amended), specifies the classes protected from housing discrimination in Miami-Dade County and as such, in the City of Miami. These protected classes are as follows: race, color, religion, ancestry, national origin, sex, pregnancy, age, disability, marital status, familial status, gender identity, gender expression, sexual orientation, actual or perceived status as a victim of domestic violence, dating violence or stalking, and/or source of income.

A sizable share of land is zoned for low-density, single-family development, which may restrict availability of relatively affordable smaller units via condominiums and small-scale multi-family that could be owner-occupied; availability of smaller units could assist households in some lower income brackets afford home ownership, yet this strategy would not explicitly be tied to specific protected classes.

Property Tax Policies

By statute the state allows homeowners to homestead a property. A homestead exemption applies to a person who, on January 1, has the legal title or beneficial title in equity to real property in this state and who in good faith makes the property his or her permanent residence or the permanent residence of another or others legally or naturally dependent upon him or her, is entitled to an exemption from all taxation, except for assessments for special benefits, up to the assessed valuation of \$25,000 on the residence and contiguous real property. An additional homestead exemption on the assessed valuation greater than \$50,000 for all levies other than school district levies is automatically applied to any property that receives the original \$25,000 exemption.

The City of Miami's property tax policies are found in Chapter 56 of the municipal code. In accordance with Article VII, Subsection 6(f), Florida Constitution, and F.S. § 196.075, the city authorizes an additional homestead exemption for any person who has the legal or equitable title to real estate and maintains thereon the permanent residence of the owner, who has attained age 65, and whose household income does not exceed \$20,000. The additional homestead exemption applies only to ad valorem taxes levied by the City of Miami. The amount of the additional homestead exemption is \$50,000.

The City of Miami provides an additional homestead exemption for persons 65 and older if the amount of the assessed value of the property with a just value less than \$250,000 for any person who has been the owner for at least 25 years, and whose household income does not exceed the income limitation set forth in F.S. § 196.075(3).

State tax exemptions also include:

- Certain disabled veterans and surviving spouses
- Certain totally and permanently disabled first responders and surviving spouses
- Disabled ex-servicemember or surviving spouse
- Totally and permanently disabled persons
- Widows, widowers, blind persons, and persons totally and permanently disabled

Lending Practices

Homeownership is vital to a community's economic well-being and lending policies and procedures can have a significant impact on fair housing choice. To satisfy the requirements of fair housing law, all persons must have the ability to live where they want and can afford. Prospective homebuyers need access to mortgage credit, and programs that offer homeownership should be available without discrimination. The task in this Home Mortgage Disclosure Act (HMDA) analysis is to determine the degree to which the housing needs of Miami residents are being met by home loan lenders.

HMDA, enacted by Congress in 1975, is implemented by the Federal Reserve Board's Regulation C. The regulations apply to certain financial institutions including banks, savings associations, credit unions, and other mortgage lending institutions. The HMDA's objectives include ensuring that borrowers and loan applicants receive fair treatment in the home loan market. HMDA information is collected from public lending institutions and discloses public loan data used to:

- Determine if financial institutions are serving community housing needs;
- Assist public officials with public sector investment to help attract private investment to areas of need; and
- Identify possible discriminatory lending patterns and enforce anti-discrimination statutes.

Data provided by the Federal Financial Institutions Examination Council (FFIEC), includes the type, purpose, and characteristics of each home mortgage application that lenders receive during the calendar year. Data is provided for the Metropolitan Statistical Area (MSA).

Data indicates there are much fewer applications for home loans from the Asian population in Miami followed by the Black population. There is a large Hispanic population in Miami making up 54,142 of home loan applications across all incomes, as reported in 2022.

For all income categories Asian and Blacks experience a lower rate of loan origination, and Black and Hispanic populations experience higher rates of loan denial.

Home Mortgage Disclosure Act (HMDA) data also reports loans originated by census tract. A review of this data shows that of the total loans originated in the MSA in 2022, 200 loans originated within Miami's R/ECAP areas (<https://ffiec.cfpb.gov/data-publication/aggregate-reports/2022/FL/33124/1>). Loan originations within the R/ECAPs show higher rates of conventional loans than FHA/VA, meaning higher credit scores and higher down payments were most likely required. Data is not available for the number of these loans that may have received public assistance for down-payment or closing costs. The benefit to obtaining conventional loans is the avoidance of private mortgage insurance required by FHA or VA loan products which increases the mortgage payment.

Loan Approval and Denial Rates by Applicant Race/Ethnicity Miami-Miami Beach-Kendall MSA, 2022					
Applicant Income	Non-Hispanic				Hispanic
	White	Black	Asian	Other*	
Low Income (0 – 50% AMI)					
Total Applications	3,906	751	110	52	3,352
Loan Origination Rate	30%	20%	25%	17%	28%
Loan Denial Rate**	43%	49%	44%	56%	46%
Moderate Income (50 – 100% AMI)					
Total Applications	7,326	1,664	147	108	7,155
Loan Originated Rate	37%	32%	24%	29%	36%
Loan Denial Rate**	37%	38%	46%	43%	38%
High Income (100% AMI and over)					
Total Applications	55,026	5,388	1,623	434	43,635
Loan Origination Rate	54%	43%	50%	37%	53%
Loan Denial Rate**	21%	27%	21%	29%	22%
<p><i>*Includes American Indians and Alaskan Natives, Native Hawaiians and Pacific Islanders, and persons of other or multiple races. Note: Analysis is based on applicants only and does not include co-applicants.</i></p> <p><i>**Applications denied by financial institution. Does not include applications approved but not accepted; application withdrawn by applicant; file closed for incompleteness; preapproval request denied by financial institution.</i></p>					

Source: FFIEC 2022 Home Mortgage Disclosure Act Data

Local Funding Sources

The city provides SHIP funding to lower income residents to assist them with homeownership and help lower income homeowners maintain their residences. SHIP strategies include:

- **Emergency Home Repair Assistance Program:** Provide emergency repair assistance to owner-occupied single-family homes. The city will provide assistance to carry out limited repairs such as roofing, electrical and plumbing to immediately rectify potentially hazardous conditions that threaten the safety and health of the occupants of the home. This supports homeownership by helping low-income owners maintain and stay in their homes.
- **Single-Family Rehabilitation Program:** helps low-income homeowners maintain and stay in their homes by providing rehabilitation assistance to residents who live in single family owner-occupied properties located within the corporate limits of the City of Miami. The city will provide assistance to complete needed repairs such as roofing, plumbing and electrical work to meet the decent, safe and sanitary standard conditions after rehabilitation.
- **Single-Family Replacement Housing Program:** helping current homeowners, this program is designed to address substandard or dilapidated housing where the cost of repairs cannot be addressed through the SHIP and/or CDBG assisted Single Family Rehabilitation Programs (\$50,000 in rehab.) Under this strategy, only single-family residential properties which are beyond repair and unsafe for human habitation will be provided assistance.
- **Homebuyers Financing Program:** Provides down payment, closing cost and/or mortgage financing assistance to eligible persons and households who are first time homebuyers to purchase a newly constructed or existing residential property within the City of Miami.
- **Homeownership Development Program:** Designed to promote and create affordable homeownership opportunities for families and individuals. SHIP Program funds reserved for this strategy will be used to assist not-for-profit and for-profit housing developers or the city. SHIP funds reserved for this strategy will be utilized by the City of Miami to finance the project cost associated with site development, hard and soft construction financing, and permanent financing.
- **Rental Housing Development Program:** Designed to promote and create affordable housing opportunities for families and individuals and support upward mobility to homeownership. SHIP Program funds reserved for this strategy will be used to assist not-for-profit and for-profit housing developers or the city. SHIP funds will be utilized to finance the project cost associated with site development, hard and soft construction

financing and permanent financing associated with the development of affordable housing units.

State and Federal Funding Impact on Affordable Housing

The city and Community Redevelopment Agency (CRA) administer funding programs that support the provision of affordable housing based on place-based improvements and affordable housing development, which in general can affect siting of new affordable housing units.

State Housing Initiatives Partnership Program (SHIP)

The SHIP program is a state funded program intended to increase or preserve affordable housing. SHIP grantees are required every three years to develop a Local Housing Assistance Plan (LHAP). The LHAP lays out the strategies for use of SHIP funds provided to the city. Strategies include emergency home repair, single-family rehabilitation, single-family replacement home program, homebuyer financing, disaster relief, homeownership housing development, and rental housing development.

Community Development Block Grant (CDBG)

The city is an entitlement community for the CDBG program, which provides funding for a wide range of community development needs. As a recipient of federal funding, the city is obligated to Affirmatively Further Fair Housing (AFFH) and certifies this through the development of the HUD-Five-Year Consolidated Plan. The city also utilizes this federal funding source to develop fair housing plans, such as this Analysis of Impediments.

The city funds several activities under the CDBG program intended to support access to fair and affordable housing including housing rehabilitation and supportive public services.

HOME Investment Partnership Program (HOME)

The HOME Investment Partnerships Program (HOME) provides funding for a wide range of activities including building, buying, and/or rehabilitating affordable housing for rent or homeownership or providing direct rental assistance to low-income people. HOME is the largest federal block grant to state and local governments designed exclusively to create affordable housing for low-income households.

Through the HOME program the city allocates funds strictly for activities that produce or preserve affordable housing including new construction of rental and owner housing, and purchase assistance.

Community Redevelopment Area Tax Increment Funding

The 2019 OMNI Redevelopment Plan notes as a strategy development of inclusionary zoning for housing, as well as options for programmatic assistance to providers of affordable housing. Much

of this redevelopment area is outside of R/ECAP areas, promoting more housing options in well-resourced areas. The 2018 Southeast Overtown/Park West Redevelopment Plan includes project area improvements that include direction for developers to build more residential units and programmatic strategies that include periodically updating housing policy, land acquisition, seeking public/private development opportunities, establishing a residential village, and a home ownership pre-qualification and counseling program to meet housing goals of infill, diversity, and retaining affordability. This redevelopment area is primarily in R/ECAP areas.

Policy Impact on Access to Economic Opportunity

The strategies that provide access to opportunity via local business development generally do not have specific provisions for protected classes; consequently, the impacts on protected classes would need to be evaluated to see if they indeed are gaining more access to economic opportunities and potential negative impacts (e.g., housing price pressure from higher property values) are mitigated. Strategies include the following:

- ACCESS Miami: Provides resources to promote financial and economic prosperity to City residents and businesses.
- The Opportunity Center: Connects job seekers and employers.
- EMPOWER60: A four-hour course for residents aged 60 and over to create individual civic engagement plans that include among other topics education and economic access.
- Accelerate Change Together: Aimed at strengthening the community's capacity to collaboratively plan and carry out strategies to close the social determinant of health equity gap for the LGBTQIA+ community.
- Inclusive Arts Miami: aimed at empowering local artists and generating positive socioeconomic change for vulnerable populations.

Access to economic opportunity is also provided with affordable public transportation options. Miami-Dade County provides transit services in the Miami area, including Metrobus, Metrorail, Metromover (free elevated people mover), and Special Transportation Service (shared-ride public transportation service in compliance with complementary paratransit service provisions of the Americans with Disabilities Act). The Special Transportation Service is focused on service for people with disabilities who cannot use Metrobus, Metrorail, or Metromover services. Additional rail service in Miami is available via Tri-Rail provided by the South Florida Regional Transportation Authority and private rail service operated by Brightline.

Policy Impact on Accessibility

Building Codes

An important way that state and local governments impact fair housing choice for individuals with disabilities is through the building and construction codes adopted and enforced in their jurisdictions. While federal housing discrimination laws impose design and building accessibility standards for certain housing and public facilities, Congress and HUD place the direct responsibility of meeting those federal standards on the architects/designers, builders, and operators of the covered accommodations, and do not require or authorize local government authorities to interpret or enforce federal accessibility requirements.

All construction in the City of Miami is done in accordance with the Florida Building Code, Florida Fire Prevention Code, and the International Property Maintenance Code as amended. The Florida Building Code includes the primary guidance containing scoping and technical requirements for accessibility to sites, facilities, buildings, and elements by individuals with disabilities. The requirements are to be applied during the design, construction, additions to, and alteration of sites, facilities, buildings, and elements. The 1993 Florida Legislature enacted the “Florida Americans with Disability Accessibility Implementation Act” which incorporated the architectural accessibility requirements of the Americans with Disabilities Act of 1990 into Florida law and maintained existing provisions of Florida law thought to be more stringent than the ADA accessibility guidelines. In 1997 the legislature amended the Act to address U.S. Department of Justice (DOJ) concerns with Florida requirements, which might not have been equivalent or more stringent than ADA architectural standards, to obtain federal certification of Florida’s building code as substantially equivalent to the Federal ADA Standards for Accessible Design as adopted by the DOJ in 28 CFR 36.

Zoning Community Residential Homes

The Fair Housing Act includes protections for individuals with disabilities that reside in community residential homes. The city’s supplemental regulations on Community Residences and Adult Family Care Homes (Miami 21 Sec. 6.1 and 6.2), including spacing requirements, comply with State law. Blanket spacing provisions should be reviewed for conflicts or violations of the Fair Housing Act. HUD Guidance in the Joint Statement of the Department of Housing and Urban Development and the Department of Justice, State and Local Land Use Laws and Practices and the Application of the Fair Housing Act state:

“In a community where a certain number of unrelated persons are permitted by local ordinance to reside together in a home, it would violate the Fair Housing Act for the local ordinance to impose a spacing requirement on group homes that do not exceed that permitted number of residents because the spacing requirement would be a condition imposed on individuals with disabilities that is not imposed on individuals without disabilities.”

HUD has determined that an across-the-board spacing requirement may discriminate against individuals with disabilities in some residential areas. Standards that state or local governments adopt should evaluate the location of group homes for individuals with disabilities on a case-by-case basis taking into consideration factors such as over-concentration of group homes and the ability of individuals with disabilities to live in integrated settings.

Visitability

Visitability is a voluntary standard endorsed by HUD to allow mobility impaired persons to visit families and friends where this would not otherwise be possible. Visitability is a growing trend nationwide. The term refers to single-family or owner-occupied housing designed in such a way that it can be lived in or visited by people who have trouble with steps or who use wheelchairs or walkers. Neither federal nor State law establishes visitability requirements. Three architectural conditions usually distinguish a visitable home: (1) one entrance with no steps, (2) doorways at least 32 inches wide, and (3) at least one half-bathroom on the main floor.

According to the AARP's "Increasing Home Access: Designing for Visitability" study, surveys show that older persons want to remain in their homes as long as possible and individuals with disabilities want the opportunity to live in affordable, accessible housing. The challenge is that most existing single-family housing and most new homes have steps at the entrance and narrow interior doorways making the home unsafe or uninhabitable for a resident with a disability, and difficult for friends or relatives with disabilities to visit.

The benefits of visitability include:

- An increase in the availability of housing options for individuals who may not require full accessibility;
- Providing property owners with assistance in making reasonable accommodations and reducing, in some cases, the need for structural modifications or transfers when individuals become disabled in place; and
- Improvement in the marketability of units.

The City of Miami does not have a visitability ordinance or a written visitability policy. However, when administering its Owner-Occupied Repairs Program, the city ensures compliance with the Americans with Disabilities Act and related accessibility requirements. The city has adopted the Florida Building Code, which includes compliance with the 2020 Florida Accessibility Code for Building Construction adopted pursuant to Section 553.503, Florida Statutes. The Florida Housing Finance Corporation has also adopted Universal Design and Visitability Features in all State funded developments that involve new construction and rehabilitation of housing units.

The Florida Accessibility Code expands the requirements of the Fair Housing Act and the ADA standards by requiring that all new single-family houses, duplexes, triplexes, condominiums, and townhouses provide at least one bathroom with a door that has a 29-inch clear opening on each

habitable grade level. This provision in the Florida Accessibility Codes promotes the concept of visitability and the city does make accessibility improvements in accordance with the building code and rehabilitation standards.

Fair Housing Partners

In enforcing fair housing law, the City of Miami partners locally with Housing Opportunities Project for Excellence (H.O.P.E., Inc.) to educate residents, landlords, and developers on their fair housing rights and responsibilities and refers housing discrimination complaints to this organization. The city also refers complaints and fair housing issues to state or federal agencies including HUD, the Florida Commission on Human Relations (FCHR), and Legal Services of Greater Miami. The following entities provide fair housing enforcement and/or education and outreach.

Housing Opportunities Project for Excellence, Inc. (HOPE, Inc.)

A private fair housing, not-for-profit, 501 (c) 3 corporation established in 1988, dedicated to eliminating housing discrimination and promoting fair housing, HOPE, Inc. employs a three-tiered system of private enforcement, education outreach and counseling to achieve its mission: to fight housing discrimination in Miami-Dade and Broward Counties and to promote equal housing opportunities throughout Florida.

U.S. Department of Housing and Urban Development (HUD)

HUD is the primary federal agency enforcing fair housing law and handles most housing discrimination complaints. Two HUD programs are dedicated to the enforcement of the Fair Housing Act: Fair Housing Assistance Program (FHAP) and Fair Housing Initiatives Program (FHIP). HUD's Office of Fair Housing and Equal Opportunity (FHEO) is responsible for administering FHIP, FHAP, and HUD's investigation of fair housing and fair lending complaints. When a complaint is filed with any jurisdiction, HUD is notified of the complaint. HUD will notify the violator of the complaint and permit all parties involved an opportunity to submit an answer. HUD will conduct investigations of the complaint to determine whether there is reasonable cause to believe the federal Fair Housing Act has been violated. The complainant is then notified. A case is typically heard in an Administrative Hearing unless one party wants the case to be heard in the Federal District Court.

Florida Commission on Human Relations (FCHR)

The State of Florida has also adopted fair housing laws. HUD has determined that the Florida Fair Housing Act (FFHA) is substantially equivalent to the federal Fair Housing Act meaning that the State law covers the protected classes in the Fair Housing Act. The state or local law may also provide additional protected classes as is the case in Florida where it is unlawful to discriminate in land use decisions or in the permitting of developments based on protected characteristics or based on the source of financing of a development or proposed development. The FFHA also

protects persons who are pregnant or in the process of becoming legal custodians of children 18 years of age or younger, or persons who are themselves handicapped or associated with a handicapped person. State and local government agencies certified by HUD to enforce state or local fair housing laws that are substantially equivalent to the Fair Housing Act receive FHAP funds. HUD provides funding to the FCHR, the agency charged with enforcing the state's civil rights laws, including the FFHA. Through annual work share agreements FCHR receives and investigates housing discrimination complaints referred by HUD. HUD provides FHAP funding for processing dual-filed complaints, training, provision of technical assistance, the creation and maintenance of data information systems, and the development and enhancement of education and outreach projects, special enforcement efforts, partnership initiatives, and other fair housing projects. FCHR prevents unlawful discrimination by ensuring that all people have access to equal opportunities in employment, housing, and public accommodations. When the Commission receives a complaint, and determines it is timely and jurisdictional, it will be investigated. The Commission will work with HUD to ensure the complaint is thoroughly investigated. Once the Commission reaches a decision, the complainant will receive instructions on how to seek the remedies provided for under the law. Possible remedies for housing discrimination include injunctions, restraining orders, damages, court costs and attorney fees.

Miami-Dade Commission on Human Rights

The Commission on Human Rights Board ("CHR Board") is a quasi-judicial, as well as advisory, board charged with the enforcement of Miami-Dade County's Human Rights Ordinance, Chapter 11A of the Miami-Dade County Code, as amended.

Legal Services of Greater Miami

Legal Services of Greater Miami is a non-profit law firm that advocates removing legal barriers to economic prosperity and to achieve a more just and equitable community.

Fair Housing Legal Status

A review of fair housing complaint data helps identify trends in housing discrimination to inform specific fair housing actions that may be needed to address the cause of any trends.

The Department of Justice

The Department of Justice documents one case of fair housing enforcement activity in the past five years:

United States v. Brisas del Mar Ltd Partnership, et al. (S.D. Fla.)

On September 7, 2021, the court entered a consent order in *United States v. Brisas del Mar Ltd Partnership, et al. (S.D. Fla.)*. The Fair Housing Act complaint, which was filed on August 31, 2021, alleges that the owners and managers of a rental property in Miami, Florida discriminated on the

basis of national origin when they rejected a man of Iranian descent for a unit because he was not Hispanic. The consent order requires the defendants to pay \$21,500 in damages to the HUD complainant, attend fair housing training, and submit to other standard injunctive relief. The case was referred to the Division after the Department of Housing and Urban Development received a complaint, conducted an investigation, and issued a charge of discrimination.

Florida Commission on Human Relations (FCHR)

Data from the Florida Commission on Human Relations (county level) revealed approximately 133 housing discrimination cases filed in Miami-Dade County over a three-year period. Most of the cases filed claimed discrimination based on disability at 44% of all cases, followed by race at 23%, national origin at 6%, familial status at 4%, sex at 2%, and retaliation at 2%.

Out of the total 133 cases filed, 60 have been closed. The rest are still seeking resolution. Closure reasons vary with most cases being closed due to no cause being found after investigation. Some cases were intake closures at about 21%, a few cases were resolved through conciliation, 5 were withdrawn with settlement, and 1 case found cause based on disability.

The Florida Commission on Human Rights only provides data by county; therefore, data is not available to determine which cases were within Miami city limits.

City of Miami / Housing Opportunities Project for Excellence (HOPE)

The City of Miami collaborates with HOPE to monitor fair housing complaints through a call intake. The most recent data available is from 2023 and indicates the hotline received 85 calls during the year with the majority of calls coming from zip codes 33125, 33147, and 33142. Thirty-nine callers reported being of the Black race and 38 callers reported being Hispanic. Six intakes claimed discrimination based on disability, 5 based on race, 3 based on national origin, 1 based on age or gender, 1 based on sexual orientation, and 68 calls reported a basis of "other". Complaints reported through the hotline were referred to several agencies including HUD, Legal Services, MD Emergency Rental Assistance and Housing Assist Network, HAND, and Miami Homeless Housing, Chapman Partnership & Carrefour.

Fair Housing Testing

In collaboration with HOPE the city also conducts testing to ensure compliance with fair housing regulations and identify discriminatory patterns. In 2023, 9 properties were tested based on complaints of racial discrimination. For two of the properties tested results supported allegations of discrimination based on race.

Fair Housing Compliance

Federal Compliance Efforts

As a recipient of federal grant funds through the U.S. Department of Housing and Urban Development (HUD), the City of Miami is obligated to Affirmatively Further Fair Housing (AFFH) and will comply through the development of this fair housing plan. The city also collaborates with various public service organizations throughout the region to assure that any discriminatory housing practices are eliminated, including the local and surrounding public housing authorities.

The city collaborates with HOPE and directs fair housing complaints to them for resolution or enforcement. The city complies with fair housing requirements through the following activities:

- Fair Housing Monitoring: HOPE recently monitored four City of Miami funded projects for compliance check with fair housing and affirmative marketing requirements
- Conducting Testing: in 2023 twelve random rental buildings in the city were tested to ensure compliance with fair housing regulations
- Fair Housing Education: the city provides fair housing and/or fair lending educational outreach sessions benefitting community-based organizations and local housing industry professionals. The contract with HOPE calls for at least ten informational sessions.
- Workshops: An annual workshop is held for City staff. The last annual workshop was held online on 4/21/23 with HOPE, Inc.
- Participation in Fair Housing Month: the city issues a Fair Housing Proclamation every year in April and recognizes Fair Housing Month.
- Distributing Information: the city distributes flyers on fair housing protected classes to city locations throughout the year and takes materials to city events.

The City of Miami is also obligated to comply with the Fair Housing Act and its amendments, which expanded the Fair Housing Act and established terms to enforce harsher penalties for those who sell or rent property and discriminate against individuals with disabilities. Additional laws the City of Miami is obligated to comply with due to receipt of federal assistance is Section 504 of the Rehabilitation Act of 1973 (which applies to programs and activities receiving federal funds), Titles II and III of the Americans with Disabilities Act (ADA) (which apply to programs, services, and activities provided or made available by public entities and to public accommodations, respectively), and the Architectural Barriers Act (which applies to federal facilities). Any housing (including single family detached homes) constructed by federal, state, or local government entities or constructed using federal funds may be subject to accessibility requirements under these laws. Housing funded by HUD also must meet the Uniform Federal Accessibility Standards (UFAS) or a standard that is equivalent or stricter. Under the UFAS, all federally assisted new construction housing developments with five or more units must design and construct 5% of the dwelling units, or at least one unit, whichever is greater, to be accessible

for persons with mobility disabilities. An additional 2% of the dwelling units, or at least one unit, whichever is greater, must be accessible for persons with hearing or visual disabilities.

State Compliance Efforts

To ensure additional enforcement of fair housing laws, the State of Florida implemented the Florida Landlord/Tenant Law. The Florida Landlord/Tenant Law was enacted to govern the rental of dwelling units and the rights and obligations of landlord and tenant. HB 1417 (2023) recently pre-empted local authority for regulating residential tenancies, landlord-tenant relationships, and other matters related to residential tenancies, which potentially included more stringent tenant protection practices at the local level.

Complaint Process

The city's housing partners mentioned above all have online websites available to the public advising people about their services and providing additional fair housing resources. Each organization also provides contact information and information on how to file a complaint should someone feel they have been discriminated against. If an individual feels that they have been discriminated against regarding the purchase or rental of housing, they may contact H.O.P.E. Inc. or the Florida Commission on Human Relations (FCHR) to file a formal complaint. Further, if an individual feels that their housing rights have been violated and would like to make a complaint to the HUD, they have one year from the date of occurrence to file a formal report. HUD will initiate an investigation and if it is determined that there is reasonable cause to believe discrimination has occurred the Secretary of HUD will charge the respondent with violating fair housing laws. Upon a formal charge being issued a HUD Administrative Law Judge (ALJ) will hear the case and issue an initial decision. In the event the parties involved elect to have their case heard in federal court the Department of Justice (DOJ) will commence a civil action.

FAIR HOUSING STRATEGIC PLAN

Fair Housing Goals				
#	Fair Housing Issue	Action Goals	Partners	Potential Funding
1	Access to an affordable and diverse housing stock.	<p>1) Consider conducting a feasibility study to evaluate and identify potential opportunities for zoning reform providing allowances for:</p> <ul style="list-style-type: none"> • Accessory Dwelling Units (ADUs) • Co-living spaces <p>2) Coordinate with local and regional Community Land Trusts (CLTs) to identify opportunities for this model to strengthen and support affordable rental and homeownership opportunities within city limits.</p>	<ul style="list-style-type: none"> ✓ City of Miami Housing & Community Development ✓ City of Miami Planning Department ✓ Miami City Commission ✓ South Florida Community Land Trust (SFCLT) ✓ Miami Homes For All ✓ Local Anchor Institutions ✓ Developers 	<ul style="list-style-type: none"> • City of Miami general revenue • Federal planning grants including Community Development Block Grant (CDBG), HOME Investments Partnership Program (HOME), Section 8, and HUD’s Choice Neighborhoods Planning Grants • State planning grants, such as SHIP and Florida

				<p>Commerce's Community Planning Technical Assistance Grants</p> <ul style="list-style-type: none"> • Historic Rehabilitation Tax Credits
2	Access to affordable homeownership in shifting markets	<p>1) Provide housing rehabilitation in conjunction with purchase assistance to increase access to affordable homeownership opportunities.</p> <p>2) Evaluate the city's purchase assistance programs to make policies market responsive by considering the allowance of appraisal gaps (with a cap), interest rate buy-downs, buyer agent commissions, and home inspection fees allowable costs.</p>	<ul style="list-style-type: none"> ✓ City of Miami Housing & Community Development ✓ Florida Housing Coalition ✓ Lenders, Mortgage Brokers, Title Companies 	<ul style="list-style-type: none"> • Federal planning grants including Community Development Block Grant (CDBG) and HOME Investments Partnership Program (HOME) • State planning grants, such as SHIP and Florida Commerce's Community Planning Technical Assistance Grants

<p style="text-align: center;">3</p>	<p>Availability of public transportation and reliable, safe connectivity to community assets, particularly in lower-income neighborhoods.</p>	<p>1) When state or federal funds are committed to a project, consider giving extra points to developers building affordable housing near transportation hubs.</p>	<ul style="list-style-type: none"> ✓ City of Miami Housing & Community Development ✓ City of Miami Planning Department ✓ City of Miami Transportation & Roadways ✓ Miami City Commission 	<ul style="list-style-type: none"> • Federal planning grants including Community Development Block Grant (CDBG) and HOME Investments Partnership Program (HOME) • State Housing Initiatives Partnership Program (SHIP) • City of Miami general revenue
<p style="text-align: center;">4</p>	<p>Aging housing stock reducing the preservation of existing affordable units.</p>	<p>1) Review state and federal funding allocations to identify opportunities to direct additional funding towards owner-occupied housing rehabilitation or to help remedy code compliance violations.</p>	<ul style="list-style-type: none"> ✓ City of Miami Housing & Community Development ✓ City of Miami Code Compliance 	<ul style="list-style-type: none"> • City of Miami general revenue • Federal planning grants including Community Development Block Grant (CDBG),

		<p>2) Consider providing educational opportunities or materials for homeowners to learn about code compliance and housing code requirements.</p> <p>3) Utilize housing rehabilitation programs to preserve owner-occupied homes, including historical homes, to maintain housing stability for homeowners and build generational wealth.</p>	<ul style="list-style-type: none"> ✓ City Office of Resilience and Sustainability ✓ City Historic Preservation Division 	<p>HOME Investments Partnership Program (HOME)</p> <ul style="list-style-type: none"> • State planning grants, such as SHIP and Florida Commerce’s Community Planning Technical Assistance Grants
5	<p>Loss of affordable units, particularly rental units, due to impacts of natural disasters, expiration of affordability periods, or private use as short-term rentals.</p>	<p>1) Consider conducting a study to determine the vulnerability of housing available to low-and moderate-income persons to hazards and disasters including storm related flooding, wind, heat, air quality, tree coverage, and sea level rise.</p> <p>2) Create an inventory of short-term rental units and consider conducting a rental market</p>	<ul style="list-style-type: none"> ✓ City of Miami Housing & Community Development ✓ Miami City Commission ✓ Shimberg Center for Housing Studies ✓ Housing Consultants 	<ul style="list-style-type: none"> • Federal planning grants including Community Development Block Grant (CDBG) and HOME Investments Partnership Program (HOME) • State planning grants, such as SHIP and Florida Commerce’s Community

		analysis to determine future policy on short-term rentals.		Planning Technical Assistance Grants
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APPENDIX A – DATA RESOURCES AND DEFINITIONS

Key Definitions

Affirmatively Further Fair Housing – To Affirmatively Further Fair Housing (AFFH) is to comply with “the 1968 Fair Housing Act’s obligation for state and local governments to improve and achieve more meaningful outcomes from fair housing policies, so that every American has the right to fair housing, regardless of their race, color, national origin, religion, sex, disability or familial status.”

Affordable - Though local definitions of the term may vary, the definition used throughout this analysis is congruent with HUD’s definition:

- HUD defines as "affordable" housing that costs no more than 30% of a household's total monthly gross income. For rental housing, the 30% amount would be inclusive of any tenant-paid utility costs.
- For homeowners, the 30% amount would include the mortgage payment, property taxes, homeowners’ insurance, and any homeowners’ association fees.

Age – As it refers to protected class status, it forbids age discrimination against people who are 40 or older.

Ancestry – A person’s caste, country, nation, tribe, or other identifiable group of people from which a person descends. It can also refer to common physical, cultural or linguistic characteristics of an individual’s ancestors.

Color – The visible color of a person’s skin; that is, pigmentation, complexion, skin shade, or tone.

Disability - "Handicap" means, with respect to a person—

- a physical or mental impairment which substantially limits one or more of such person's major life activities,
- a record of having such an impairment, or
- being regarded as having such an impairment,

But such term does not include current, illegal use of or addiction to a controlled substance (as defined in section 802 of title 21).

Ethnicity – Shared attributes of a group of people who identify with each other that distinguish them from other groups such as a common set of traditions, ancestry, language, history, society, culture, nation, religion, or social treatment within their residing area.

Fair Housing Choice - In carrying out its Housing Equity Plan, the county utilized the following definition of “Fair Housing Choice”:

- The ability of persons of similar income levels to have available to them the same housing choices regardless of race, color, religion, sex, national origin, familial status, or handicap.

Familial Status

- One or more individuals (who have not attained the age of 18 years) being domiciled with—
 - (1) a parent or another person having legal custody of such individual or individuals; or
 - (2) the designee of such parent or other person having such custody, with the written permission of such parent or other person.

The protections afforded against discrimination on the basis of familial status shall apply to any person who is pregnant or is in the process of securing legal custody of any individual who has not attained the age of 18 years.

Impediments to Fair Housing Choice - As adapted from the Fair Housing Planning Guide, impediments to fair housing choice are understood to include:

- 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.

Marital Status – The state of being married, divorced, or single.

National Origin - A person’s birthplace or ancestry, such as someone who is Latino/a or Hispanic or from another country or region of the world.

Protected Classes - In carrying out its Housing Equity Plan, the county utilized the following definition of Protected Classes:

- Title VIII of the Civil Rights Act of 1968 prohibits housing discrimination based on race, color, national origin or ancestry, sex, or religion. The 1988 Fair Housing Amendments Act added familial status and mental and physical handicap as protected classes.

Race - Refers to whether a person is White, Black/African American, Asian, American Indian or an Alaska Native, or is a Native Hawaiian or Pacific Islander, or some mixture of two or more of these groups.

Religion – Includes the practice and non-practice of religion, such as atheism, as well as religions that are outside the mainstream.

Sex - Biological makeup, including genitalia, genetic differences, and sex characteristics. Typically, sex includes male, female, and intersex. Under the laws of discrimination and harassment, the phrase also includes gender or sexual orientation.

- Gender Identity: The identity and expression of socially constructed characteristics often associated with men and women.
- Sexual Orientation – A person’s physical, romantic, sexual, and/or emotional attraction to others or lack thereof.

Data Sources

Decennial Census Data – Data collected by the Decennial Census for 2010 and 2000 is used in this Analysis. This older Census data is only used in conjunction with more recent data to illustrate trends.

American Community Survey (ACS) – Data used for demographics, employment, and economic, and housing section of this plan rely on the 2018-2022 five-year ACS estimates, unless otherwise noted. The five-year ACS offers 60 months of data collected between January 1, 2018 and December 31, 2022. This data set is used in this report because it offers estimates with relatively low margins of error and maximizes reliability of data at the census tract level. This second point is of particular importance to fair housing analysis because fair housing choice is often realized on a neighborhood-by-neighborhood basis. The American Community Survey is an ongoing statistical survey that samples a small percentage of the U.S. population every year, thus providing communities with more current population and housing data throughout the 10 years between censuses.

The ACS multi-year estimates are more current than Census 2020 data and available for more geographic areas than the ACS 1-Year Estimates, this dataset is one of the most frequently used. Because sampling error is reduced when estimates are collected over a longer period of time, 5-year estimates will be more accurate (but less recent) than 3-year estimates. ACS datasets are published for geographic areas with populations of 20,000 or greater.

Previous Works of Research – This Housing Equity Plan is also supported by, and in some cases builds upon, previous works of significant local, state, and federal research conducted for or within the county. These works of research may include, but not be limited to, the following:

- 2019-2023 HUD Five-Year Consolidated Plan
- Previous Analysis of Impediments to Fair Housing Choice
- SHIP Local Housing Assistance Plan
- Comprehensive Plan
- HUD Point-In-Time Count
- HUD Housing Inventory Count
- Public Housing Plan

- Realtors Property Resource Market Analysis
- Florida Realtors SunStats Reports
- Home Mortgage Disclosure Act Data (HMDA)
- Community Redevelopment Agency Plans

APPENDIX B – FAIR HOUSING SURVEY

This includes a Survey Response Report with a listing of questions asked and responses gathered via the online survey that was issued and promoted. This includes pie chart and bar chart display. Should you like a copy of this survey report, please e-mail communitydevelopment@miamigov.com or call 305.416.2096.

APPENDIX C – OUTREACH

Outreach includes copies of flyers created and issued to promote the public meetings tied to the AI and advertisements placed in relation to the preparation of the AI document. Should you like copies of these, please e-mail communitydevelopment@miamigov.com or call 305.416.2096.