

- Fair Housing Community Education – During 2021-22, the FHCOC regionally conducted or participated in 67 virtual and 21 in-person education and/or outreach activities, reaching a culturally and ethnically diverse audience, in which they made participants aware of fair housing laws and counseling services (including services to help households improve their readiness for a home purchase). Because of the COVID-19 pandemic-driven need to engage with participants virtually, 52 of the virtual activities were not specific to residents of the Urban County jurisdiction, but they were all available to those residents.

Regionally, about 2,400 people were contacted or served by these activities. Through its various regional outreach efforts FHCOC distributed over 19,800 information pieces on fair housing, its services and other housing-related topics, in either English, Spanish or Vietnamese. A significant number of these items were distributed electronically, with the rest mainly distributed via mail or bulk delivery. Additionally, throughout Orange County FHCOC held 12 virtual training sessions for rental property owners/managers. FHCOC presented 2 virtual fair housing seminars for housing providers in cooperation with the Apartment Association of Orange County (AAOC). Nineteen general fair housing workshops intended for participation by both/either housing consumers and providers throughout Orange County were provided. Due to the virtual nature of these workshops none were specific to residents of the Urban County jurisdiction, but they were largely available to those residents.

- Fair Housing Enforcement – On a regional basis, FHCOC staff performed 176 intakes regarding fair housing issues, which resulted in receipt of 128 allegations of housing discrimination and the opening of 61 case files, where the allegations seemed sufficiently meritorious to warrant further investigation and/or action. We also counseled or informed another 67 clients regarding fair housing law and/or rights. Thirty intakes and 25 allegations arose from the Urban County jurisdiction, resulting in the opening of 11 cases involving housing in the Urban County jurisdiction. On a regional basis, FHCOC also conducted 116 paired telephonic, systemic tests for discriminatory rental housing practices. An additional 8 paired systemic tests of real estate agents and 6 paired systemic pre-application tests of lenders were conducted telephonically. While all such systemic testing would normally be conducted in person, COVID-19 pandemic restrictions necessitated they be conducted via telephone only. Seventeen systemic rental tests involved locations in the Urban County jurisdiction.

Furthermore, 20 paired telephonic or relay supported test were conducted regionally to assess discrimination of possible discrimination against housing seekers who are deaf or hard of hearing. We also conducted 5 assessments of compliance with accessibility requirements for persons with disabilities at covered multi-family properties built within the last two years.

- Housing Dispute Evaluation & Resolution – On a regional basis, activities provided by FHCOC included assisting 3,168 unduplicated households addressing 9,875 issues,

disputes and/or inquires. Of these, 644 unduplicated households, involving 1,851 issues, disputes and/or inquires, were from the Urban County jurisdiction.

- Reasonable Accommodations – On a regional basis, 15 inquiries regarding reasonable accommodations and modifications were received by FHCOC that resulted in casework beyond basic counseling. Two of the inquiries arose from the Urban County jurisdiction, and their status is pending. Overall, 10 of the 15 clients requested and received a reasonable accommodation, with 4 still pending and 1 where the client did not pursue the matter. Of those that are pending, any that are effectively and improperly denied will likely be referred as an administrative complaint filed with the Fair Housing and Equal Opportunity (FHEO) Office of the U.S. Department of Housing and Urban Development. Another 104 households were counseled on issues involving reasonable accommodation of a disability-related need at their housing.
- Web-based Outreach – FHCOC’s website currently has an on-line housing discrimination complaint-reporting tool that generates an email to FHCOC. It is also used for other, non-discrimination, housing-related issues. The County of Orange has a link to the FHCOC website where residents can access this information.
- Monitoring On-line Advertising – Orange County rentals listed on Craigslist were monitored by FHCOC for discriminatory content (as permitted by staffing limitations). Any discriminatory advertisements were flagged as prohibited and FHCOC responded to these ads through Craigslist’s reply mechanism in order to inform the poster of possible discriminatory content. In most instances it was not possible to identify the property address and the identity of the individual making the posting. When possible FHCOC also brought these ads to the attention of Craigslist to hasten their removal, although the Craigslist reporting mechanism is no longer simple. When investigation was found to be feasible, the ad was referred to FHCOC’s investigators for possible enforcement action. Other on-line rental advertising sites (e.g., *OC Register*, *LA Times*, *Westside Rentals*, *Zillow*, etc.) were sporadically monitored; however, the lack of an efficient text search function on these sites made monitoring them less practical. Without exception, among the ‘apt / housing’ Craigslist rental listings, the identified problematic postings indicated restrictions with regard to children under the age of 18 or improper preference for seniors or ‘older adults’ for housing opportunities that did not appear to qualify as housing for older persons (age 55 and over). Overt racial or national origin discrimination in postings was not observed. Advertising in the ‘rooms / shared’ area of Craigslist was observed to have a higher incidence of stated preferences that violated fair housing law. However due to the practical aspects of resource limitations and case law considerations of shared housing situations, most were not acted upon. With the change in California law effective January 1, 2020 that expanded ‘source of income’ protections to individuals who use forms of housing rent assistance, such as the Housing Choice Voucher (often called ‘Section 8’), FHCOC had previously identified numerous Craigslist postings that contained discriminatory language regarding the use of

housing rental assistance. In the 2021-2022 program year, FHCOC did not find any Craigslist postings for Orange County rentals that discriminated against users of a Housing Choice Voucher, even though this continued to be an issue in other parts of Southern California.

- Monitor Home Mortgage Disclosure Act Data - Ongoing monitoring of Home Mortgage Disclosure Act (HMDA) data continues to be infeasible due to limited resources at FHCOC. FHCOC last was able to conduct such analysis using 2008 data (then the latest available) in conjunction with the preparation of the 2010-2015 *Regional AI*. Analysis of updated HMDA data from 2013, as well as other mortgage lending practices, was included as part of the Urban County jurisdiction's FY 2015-2020 Regional Analysis of Impediments to Fair Housing Choice (AI), which was submitted as part of its Five Year Consolidated Plan FY 2015 - 2020. Similarly, the recently completed Regional Orange County Analysis of Impediments to Fair Housing Choice for the 2020-2024 Consolidated Plan cycle, contained some basic analysis of regional HMDA data for the period of 2014-2017. That analysis showed disparities in the access to loans on the basis of race, with minority applicants having less access than white applicants.
- During 2021-22, FHCOC continued efforts to promote housing affordability within Orange County. It provided services and outreach to organizations involved in the creation and preservation of affordable housing. These groups included the Kennedy Commission, Mental Health Association of Orange County, Radiant Health (formerly Aids Services Foundation), Affordable Housing Clearinghouse, Jamboree Housing Corporation, Mercy House, South County Outreach, Families Forward, Orange County Congregations Community Organizations, and Orange County Community Housing Corporation.
- During the 2021-22 reporting period, FHCOC continued to offer fair housing training sessions, and these were open to all local government staff. Due to COVID-19 imposed restrictions all trainings were conducted virtually. Training activity included providing training to staff of the Orange County Housing Authority, which serves the Urban County jurisdiction. Any County or participating city staff attending training could receive certification of their attendance.
- The FHCOC produced and provided written fair housing related materials in English, Spanish and Vietnamese to the persons in the Urban County jurisdiction. Due to limitations necessitated by the COVID-19 pandemic our ability to distribute physical materials was severely limited, as public meetings and events were still significantly limited. Some materials were distributed by mail or email to persons contacting our agency or participating in virtual outreach activities. FHCOC also undertook specific virtual outreach efforts to immigrant populations in low-income neighborhoods. On a regional basis, an estimated 870 limited English proficiency (LEP) households were served during the 12 month program period, through a combination of telephonic contact and virtual education and outreach activities. FHCOC also continued to implement activities under HUD Fair Housing Initiatives

Program grants, for both education and outreach and fair housing enforcement. These efforts were also limited to virtual activities. These program efforts specifically targeted fair housing services to persons with disabilities, minority groups and immigrant communities, especially immigrants with limited English proficiency. Program efforts included a fair housing testing program that sought to involve members of immigrant populations with limited English proficiency, both for purposes of enforcing fair housing laws as testers and as a vehicle to increase outreach to these populations.

- Through its status as a HUD-approved Housing Counseling agency, FHCOC assisted individuals, including those with limited English proficiency (LEP), with various housing related problems. This included being available to counsel and assist those who had received loans with documents, all prepared in English, which had terms that were different from what they believed or were informed they were obtaining, or of which they had less than a full understanding. Many of the other counseling activities under its HUD-approved Housing Counseling also assisted individuals with LEP