

During the 2023-2024 report period the County of Orange within its urban county jurisdiction took the following actions (on its own or in cooperation with regional partners and the Fair Housing Council of Orange County (FHCOC)) to overcome impediments to fair housing choice identified in the regional AI:

- Fair Housing Community Education – During 2023-2024, the FHCOC regionally conducted or participated in 13 virtual and 49 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). As a result of practices that became commonplace and accepted due to the COVID-19 pandemic, the use of virtual education remained a major component during the 2023-2024 period, especially for workshop presentations. All of the 13 virtual activities were not specific to only residents of Orange County urban county jurisdiction, but they were all available to those residents. For the Orange County urban county jurisdiction we conducted 1 in-person education and outreach activities specific to the residents of the city of Laguna Beach.

Regionally, about 1,750 people were contacted or served by these activities. Through its various regional outreach efforts FHCOC distributed over 17,900 information pieces on fair housing, its services and other housing-related topics, in either English, Spanish or Vietnamese. Most of these items were distributed either directly or via mail or bulk delivery, while some were delivered electronically. Additionally, throughout the Southern California region FHCOC held 10 virtual training sessions for rental property owners/managers, with another 7 presented in person, with most involving managers and owners with properties in Orange County. FHCOC also presented 2 virtual fair housing seminars for housing providers in cooperation with the Apartment Association of Orange County (AAOC). Eleven general fair housing workshops intended for participation by either housing consumers or providers, or both, were provided throughout Orange County. Because 7 these were virtual, they were not specific to residents of the Orange County urban county jurisdiction, but they were largely available to those residents.

- Fair Housing Enforcement – On a regional basis, FHCOC staff performed 145 intakes regarding fair housing issues, which resulted in the receipt of 93 allegations of housing discrimination and the opening of 37 case files where the allegations seemed sufficiently meritorious to warrant further investigation and/or action. We also counseled or informed another 108 clients regarding fair housing law and/or rights. Twenty allegations arose from the Orange County urban county jurisdiction and 6 cases involved housing in that jurisdiction. On a regional basis, FHCOC also conducted 121 paired telephonic, systemic tests for discriminatory rental housing practices. Fifteen systemic rental tests involved locations in the Orange County urban county jurisdiction. Regionally an additional 13 paired telephonic tests of housing providers to determine possible source of income (SOI) discrimination were

conducted. Regionally, 10 real sales tests and 10 paired telephonic systemic pre-application tests of lenders were conducted. While the lending testing previously would have normally been conducted in person, protocols and behaviors initiated by COVID-19 pandemic restrictions have made telephone contact with loan officers commonplace.

Furthermore, 16 paired telephonic and relay operator supported tests were conducted regionally to assess possible discrimination against housing seekers who are deaf or hard of hearing. We also conducted 3 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 3,133 unduplicated households addressing 11,021 issues, disputes and/or inquires. Of these, 597 unduplicated households, involving 2,161 issues, disputes and/or inquires, were from the Orange County urban county jurisdiction.
- Reasonable Accommodations – On a regional basis, 14 inquiries regarding reasonable accommodations and modifications were received by FHCOC that resulted in casework beyond basic counseling. One of the inquiries arose from the Orange County urban county jurisdiction. Overall, 6 of the 14 clients requested and received a reasonable accommodation. Two clients did not follow through in process, 1 client's request was deemed not implementable, and the outcome for 5 others, including 1 modification request, were pending at the end of the program year. Regionally, another 17 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 and 9 of the urban county jurisdiction's participating cities have a website 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 during 2020. In the 2023-2024 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. However, several callers brought to our attention a few ads for Orange County rentals on other platforms that had stated an illegal refusal to accept housing assistance. When possible we reached out to the individuals offering the housing to demand a change in their ad.

- 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 City of the Orange County 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. Further HMDA analysis to assess possible mortgage lending disparities on the basis of race and ethnicity in Orange County will require the provision of funding specific for that purpose.
- Other Actions to Affirmatively Further Fair Housing - During 2023-2024, 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 2023-2024 reporting period, FHCOC continued to offer fair housing training sessions, and these were open to all local government staff. As has become the norm since COVID-19 imposed restrictions first appeared, more than half of all trainings were conducted virtually. Training activity included providing in-person training to staff of the Orange County Housing Authority (OCHA), which serves the Orange County urban county jurisdiction. Any of county or urban county city staff attending our offered 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 Orange County urban county jurisdiction. 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 either telephonic contact, or a combination of virtual and in-person 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 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 the purpose 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 may have been 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