



# RHD Rural Delivery

New York State Rural Housing Coalition, Inc.

August, 2015

## Capital Projects Unified Funding Announced

NYS Homes and Community Renewal announced the availability of approximately \$200 million in affordable housing funding on July 23rd. Commissioner/CEO James S. Rubin announced the latest round of funds and tax credits, totaling over \$200 million, for the preservation and construction of affordable housing statewide. The financing will be made available by HCR via Unified Funding, a competitive Request for Proposal (RFP) process that allows applicants to apply for 11 different funding sources using a single online application.

HCR will once again be offering an accelerated Early Award option for shovel-ready projects that clearly advance State housing goals, such as Transit Oriented Development, Housing Opportunity Projects, and Mixed-Income, Mixed-Use Revitalization. For the first time, HCR is announcing its Early Award State housing goals several weeks prior to issuing the formal RFP to give developers, municipalities and not-for-profits additional time to plan for Early Award submissions which are due on October 6th. If an application does not receive an early funding award, it may be considered for an award as part of later funding round decisions. The deadline for all other Unified Funding applications is December 3rd. The Unified

Funding RFP will be issued in mid-August.

HCR has posted three notices to the State Register on Tuesday, July 21st: a Notice of Credit Availability (NOCA) for federal tax credits available under the Low-Income Housing Credit Program (LIHC) and a NOCA for tax credits available under the New York State Low-Income Housing Tax Credit Program, both for low- and moderate-income households; and a Notice of Funding Availability (NOFA) for state and federal funds for low-, moderate- and middle-income households. Funding available under the NOFA includes money from the following programs: New York State Low-Income Housing Trust Fund program (HTF); the New York State HOME program (NYS HOME); the Rural Area Revitalization Projects program (RARP); the Urban Initiatives program (UI); the Community Investment Fund (CIF); the Medicaid Redesign Team Housing Capital program (MRT); the Mitchell-Lama program (ML); and the Middle Income Housing Program (MIHP). To see the documents, please visit HCR's website: [www.nyshcr.org/Funding/](http://www.nyshcr.org/Funding/).

At this stage, HCR is looking for high-quality, Early Award projects that can proceed quickly and that advance specific state housing

goals, including: promoting Housing Opportunity; Transit-Oriented Development; revitalization and economic development; preserving previously subsidized affordable housing; providing disaster relief; creating mixed-income and mixed-use developments; developing land acquired through land banks; having a retail or community service component; promoting home ownership; providing supportive housing with services; undertaking rural development; and/or including an environmental remediation component.

*There will be a full day course 'Introduction to Multi-family Development' offered at the Rural Housing Coalition's annual conference in Oswego on September 17th. This training is perfect for those who are interested in taking on a development project. Watch your mailbox for registration information coming soon!*

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**RD**

**Rural Delivery**

Rural Delivery is published by the  
New York State Rural Housing Coalition, Inc.

The Coalition is a non-profit statewide membership organization dedicated to strengthening and revitalizing rural New York by assisting housing and community development providers.

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Rural Delivery is published monthly and delivered electronically to a mailing list of 200 community development professionals and policy makers.

For information on advertising in Rural Delivery and to receive a copy of our advertising rate sheet, please contact the Coalition at:  
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Web Site: [www.ruralhousing.org](http://www.ruralhousing.org)



## Bits and Pieces...

### Long Island Housing Operator Sought

The NYS OMH announced a Request for Proposals for the operation of 37 existing units of Supported Housing for persons residing in Nassau and Suffolk Counties. Under this RFP, OMH seeks to identify a current Long Island housing provider to assume operation of these units. These units are located in scattered-site apartments in Suffolk and Nassau Counties - 20 units are located in Suffolk County and 17 units are located in Nassau County.

The successful applicant must agree to work with the agency that is surrendering the units in order to ensure an appropriate transition with minimal disruption to the residents. The expectation is that chosen awardees will continue to work with the individuals who currently reside in the Supported Housing units and will fill any vacancies as needed.

See RFP for details at [www.omh.ny.gov/omhweb/rfp/](http://www.omh.ny.gov/omhweb/rfp/).

### Margaretville Gateway RFP

The Governor's Office of Storm Recovery seeks proposals from New York State licensed professional architectural and engineering (A/E) firms best qualified to provide the services necessary for initial master planning, studies, and preliminary design for a flood mitigation, resiliency, and redevelopment project located in the area of Bridge Street in Margaretville, New York.

The Village of Margaretville will select qualified architectural and engineering firms of the highest quality that employ adequate staff and possess the financial management capacity to be able to focus immediate attention on this project. Proposals are due on August 20th.

For more information, visit [www.nyscr.ny.gov/documents/Upstate\\_Catskills\\_Margaretville\\_Gateway%20Study\\_RFP\\_07202015.pdf](http://www.nyscr.ny.gov/documents/Upstate_Catskills_Margaretville_Gateway%20Study_RFP_07202015.pdf).

Federal and U.S. military employees can support the Rural Housing Coalition through the annual Combined Federal Campaign (CFC). If you are a federal government or military employee and would like to donate through the CFC, please enter CFC code #9614 on your pledge card during the next fund drive.

## Supportive Housing NOFA Released

The New York State (NYS) Office of Temporary and Disability Assistance (OTDA) announces a funding opportunity from the New York State homeless housing programs fund appropriated in the State Fiscal Year (SFY) 2015-16 Aid to Localities budget for the New York State Supportive Housing Program (NYSSHP). OTDA will make funding available statewide for eligible projects. Applications will be accepted from units of local government, local social services districts, tribal organizations and not-for-profit corporations. The New York State Supportive Housing Program (NYSSHP) is designed to provide direct services to eligible populations residing in permanent or transitional housing projects managed by eligible applicants. NYSSHP funds support the cost of providing services designed to promote housing stability and greater independence including, employability, mental/physical health stability and/or academic attainment. The support services provided should assist residents in achieving as self-sufficient a life possible while enhancing housing stability.

Applications for this program are due on September 3rd. For more information, visit [www.nyscr.ny.gov/business/adsPubView.cfm?ID=F4AE52D8-9E04-48DE-AE3B-DE99BDB1B67A](http://www.nyscr.ny.gov/business/adsPubView.cfm?ID=F4AE52D8-9E04-48DE-AE3B-DE99BDB1B67A).

### '15 Conference Hotel Code

A special code is now available to secure the discounted hotel room rates in Oswego. Call the Best Western at (315) (315) 342-4040 and the nearby Quality Inn (315) 343-1600. Please use our special code (RHC-2015) at either hotel to secure the special conference room rates.

## EPA Finds Violations Of RRP Rule At Kansas City Company

The Environmental Protection Agency Region 7 Office conducted a random record keeping inspection at Damage Control & Restoration, Inc., in Kansas City, Kan., which revealed violations of the Renovation, Repair, and Painting (RRP) Rule. As part of a settlement with EPA, the company has agreed to pay a \$12,194 penalty to the United States government.

The Renovation, Repair, and Painting Rule seeks to reduce lead exposure from toxic lead dust that can be disturbed during renovations and repairs. The rule regulates lead-based paint activities, including renovation of residences built prior to 1978, and the certification of individuals and firms who are involved in these activities.

The recordkeeping inspection at Damage Control & Restoration, a home renovation company that specializes in fire and water restoration, revealed that the company failed to distribute required pamphlets, and retain records documenting lead safe work practices.

Lead exposure can cause a range of adverse health effects, from be-

havioral disorders and learning disabilities to seizures and death, putting young children at the greatest risk because their nervous systems are still developing. Today some 4 million households have children who are being exposed to high levels of lead.

There are approximately 500,000 US children ages 1-5 with blood lead levels above 5 micrograms per deciliter (µg/dL), the reference level at which the Centers for Disease Control recommends that public health actions be initiated.

*Ed. Note: The Rural Housing Coalition is making available RRP training, both the Initial and Refresher courses in conjunction with the 2015 Annual Affordable Housing and Community Development Conference in Oswego. This training is open to home improvement contractors as well as staff of housing agencies. It will be held on September 16th.*

*To register for this training, visit [www.ruralhousing.org](http://www.ruralhousing.org) and click on the 'Read More' button under the heading Register Now For RRP Training.*

## Insurance And Grants

RESTORE grantees last year and in the current cycle may have noticed a subtle change in the language required on LPA liability, workers comp, and disability policies that are required to be submitted to NYSHCR at the start of the program. It is no longer sufficient to name the Housing Trust Fund Corporation as an additional insured. It is now necessary to include 'the State of New York' as an additional insured as well. In the case of one insurer, that language requirement has become a major obstacle, as the insurer refuses to include that language on policies or certificates of coverage it issues. This puts the grantees in an impossible position of declining the grant or finding new insurance coverage, presumably paying twice for insurance.

When you are putting your insurance coverage out to bid, it is worth asking your broker if there will be any problem including the language that HCR requires on the policy documents. If there will be, choose another carrier.



## Project Profile: Calkins Corners: A Family Comes Together

*In our regular feature, Rural Delivery invites members of the Rural Housing Coalition to highlight their community development projects and programs in the pages of this newsletter. This month, we are pleased to present a project of the Bishop Sheen Ecumenical Housing Foundation. In their own words, here is their story:*

Ask residents at Sheen Housing's Calkins Corners apartment building

what it's like to live there, and you'll find one descriptive word used over and over again: "Family." Take Jim, for example, who moved in on November

1, 2013, the day Calkins Corners opened, and nicknamed his self-described "gorgeous" third-floor apartment "the penthouse." "It still kind of amazes me that I've become so close to my neighbors here," Jim says. "It never happened in my life that I got to know my neighbors the way I have here. They are wonderful people, and this has become a real family. We party together, enjoy activities together, and look forward to doing even more."

The 60-unit, three-story apartment building provides independent living for seniors ages 62 and above. It features 48 one-bedroom units and 12 two-bedroom units. It has eight fully accessible units for persons with mobility impairments and two fully accessible units for persons with hearing or vision impairment. In addition to the bedroom(s), each

apartment includes a living/dining area, bath, full kitchen with all appliances and a patio or balcony. There is extra storage room, as well.

Calkins Corners, a mixed-income facility, was funded by the US Department of Housing and Urban Development (HUD) 202 Program, the New York State Homes and Community Renewal Program, and the Federal Home Loan Bank of New York. It was the first project under the new HUD 202 Program.



Calkins Corners was fully occupied almost immediately. In fact, it had a waiting list of more than 300 before construction even began, and there's a long waiting list today. Besides the spanking new building with fully equipped apartments, a lounge area,

a community room, a library, an exercise room, community patio and on-site laundry facilities, Calkins Corners offers an advantage often called the most

important asset in real estate—location. The facility is nestled adjacent to a Wegmans food market and pharmacy on one side and the Town of Henrietta's Senior Center and Library on the other. Transportation is provided to and from Calkins Corners by the Senior Center, but many residents enjoy walking to either the Senior Center or the Library. "When the weather is decent, I enjoy the walk to the Senior Center," says Bob, as he works on a jigsaw puzzle in the lounge. "Everything is just so convenient. I love it here; everyone does."

Quick to echo that sentiment was Liz, who says ever since she moved in she feels "as if I'm in seventh heaven. It's just so beautiful." Liz is often in the lounge area, knitting, crocheting, playing cards or Scrabble, or just talking with her many resident friends. "We have a great time and try not to harass each other," Liz says with a smile. "And we all agree on one thing: we'll never leave this place. We are a family."



# Career Opportunities

## Chief Operating Officer

RUPCO, Inc. is seeking an accomplished professional with at least 10 years of housing experience, ideally in a management/leadership role in a complex organization, non-profit or private sector. Experience in non-profit finance, asset management and human resources shall be considered a plus.

The Chief Operating Officer is a key member of the Executive Council and Senior Management Team at RUPCO and reports to the Chief Executive Officer. Duties and responsibilities include: Manage core housing functions including Asset and Property Management, Support Services, Human Resources and operations; Oversee insurance, contract and grant compliance; Assist CFO in preparation of annual budgets; Serve as member of the Executive Management Council and Senior Management Team; working together to provide the organization with a strategic vision and mission; Serve as RUPCO's Green Team Leader; Participate in Board of Directors committees: Finance and Audit, Asset Management/Real Estate, Rental Assistance/Program Services; Participate in training and education seminars as needed to maintain current skills and to expand expertise as may be required to implement organization's programs and projects; Coordinate RUPCO's reporting for NeighborWorks America; Assume lead role in managing Rural Preservation Program and NeighborWorks America grants. Exceptional organizational skills required. Bachelors' Degree and 10 years related experience required, Masters Degree preferred. Must have valid drivers' license and reliable vehicle. To apply, please send cover letter, resume and salary requirements by August 21, 2015 to [jobs@rupco.org](mailto:jobs@rupco.org), or send via mail to RUPCO, Inc., 289 Fair St. Kingston, NY 12401. EOE

## Executive Director

Shires Housing is a not for profit corporation headquartered in Bennington, Vermont that provides high quality affordable housing throughout southwestern Vermont. Shires Housing operates 250 units of affordable rental housing with the opportunity to significantly expand our management portfolio. The organization currently has multiple affordable housing development projects underway or about to begin.

Shires Housing is seeking a dynamic executive director to lead our successful nonprofit housing development and management organization as we continue to grow to meet the affordable housing needs of the region. The successful candidate will have substantial experience in the development and/or management of affordable housing using the federal LIHTC and similar forms of financing. The candidate will have a track record of successful financial management of not for profit organizations including 5 to 7 years of progressively responsible experience in a combination of not for profit management, affordable housing development, construction management and/ or property management, a Bachelor's degree in an appropriate field (a Master's degree is preferred) and strong written and verbal skills. Salary is commensurate with experience.

A resume and cover letter with salary requirements should be sent to [search@benningtonhousing.org](mailto:search@benningtonhousing.org) before August 15, 2015. Shires provides reasonable accommodations for applicants with disabilities. EOE

## Finance Manager for Area Housing Organization

IMMEDIATE OPENING

The Finance Manager is responsible for overall administration of the Finance Department and the administration of all fiscal functions for a not-for-profit corporation and related entities. Responsibilities include completion of accurate fiscal record keeping, related reporting and maintenance of all fiscal computer programs and files. Also responsible for budgeting and financial management of rental property portfolio. Qualifications: 10 years relevant experience. Bachelors Degree preferred. Salary based on qualifications.

Send resume and cover letter by August 10th to: GVRPC, Inc., 5861 Groveland Station Rd, Mt. Morris, NY 14510 or email to: [ngangi@gvrpc.com](mailto:ngangi@gvrpc.com) or call: (585) 658-4860 for an application. EOE

The New York State Rural Housing Coalition is happy to be able to provide help wanted advertising opportunities for our members and non-profit community development agencies. Ad copy must be provided in Microsoft Word format, and may be transmitted by email to [rhc@ruralhousing.org](mailto:rhc@ruralhousing.org). Ad copy must comply with federal and state equal opportunity requirements to be published, and must be received by the 25th of the month to ensure placement in the succeeding issue of *Rural Delivery*. Ads provided in this fashion will also be posted in the Career Opportunities page of the Coalition's website, unless a request is specifically made not to place the advertisement on-line.

## Keeping Abreast Of Lead Requirements

By Michelle DeGarmo

Five years have passed since the implementation of the RRP Rule, and it's still a common occurrence to encounter contractors and housing professionals who are unclear, or completely unaware, of how RRP works with HUD or other federal funds.

As a lead based paint Risk Assessor, I often encounter well meaning contractors working in HOME, CDBG, or other federal programs who are unsure how to comply with RRP. The most common issue is the misunderstanding about trained non-certified workers. On a project that involves no federal funds, it is acceptable for a single RRP Certified contractor to train a crew of workers. These trained non-certified workers may perform lead safe work practices with minimal supervision as long as their training is properly documented and they are supervised by a Certified Renovator.

Once federal funding is involved, HUD rules supersede the RRP rule alone. Remember back in the day

when we all had to take the HUD Safe Work Practices course? I took my Train the Trainer course at the 2001 Rural Housing Coalition conference and happily taught LSWP in library common rooms and coffee shops across the state until 2009 when HUD's lead regulations got lobbied and lawyered into what we now know as the Renovation, Remodeling, & Painting Rule. For those of us who didn't run housing programs under the first Cuomo administration, keeping RRP's origin story in mind may help remind new program administrators and contractors about that often overlooked difference.

It's been a few years since we've had a comprehensive, statewide training about RRP compliance when dealing with federally funded programs. It can be difficult enough to get contractors to work in our programs, and now we have to break the news that their entire crew needs a training that can cost upwards of \$300 depending on your location. Free trainings aren't as common as they used to be and even full-price

Initial courses are hard to find at the last minute. Most of our Initial classes these days are booked less than three days before the training – almost entirely by contractors who were just informed by a building inspector that they can't start work without RRP Certification.

My advice to LPAs and other housing professionals is to carefully review the parts of Title X that apply to your funding sources, and cross reference this information with the RRP Rule. EPA and HUD have been partners on both regulations for over two decades, and don't forget that Title X was essentially the beta version of RRP. Also remember that if you're not currently in total compliance, it's never too late to solve that problem. If you aren't sure how to make HUD / EPA rules work cohesively in your housing programs ask questions. If you get conflicting answers, check with the National Lead Information Center, or contact the Rural Housing Coalition (they're an invaluable resource for all sorts of compliance issues).

Michelle Read DeGarmo, President of Flatley Read, LLC, is a lead based paint Risk Assessor, EPA Accredited RRP Trainer, and a serious cheerleader for the Rural Housing Coalition. Michelle will be leading the RRP certification training that will be held in Oswego in September. Visit [www.FlatleyReadLLC.com](http://www.FlatleyReadLLC.com) for more information on her firm. Visit the Coalition's website at [www.ruralhousing.org](http://www.ruralhousing.org) to access the link to register for the September 16th RRP training in Oswego.

## Case Management NOFA Released

The Governor's Office of Storm Recovery (GOSR) of the Housing Trust Fund Corporation announces a NOFA to secure the services from nonprofit organizations to provide disaster case management and other technical assistance to applicants to the New York Rising Housing Program. It is the intent of GOSR to provide individualized recovery plans incorporating general social services to particularly vulnerable NY Rising applicants. GOSR also intends to assist NY Rising applicants, on an individual and group instruction basis, by providing technical assistance in the areas of homeownership and financial counseling and legal assistance. The overall purpose of the NY Rising Disaster Case Management and Technical Assistance Program is to provide needed guidance and support to vulnerable NY Rising applicants who are having difficulty in completing the repairs or reconstruction of their homes because of a variety of particular challenges and personal difficulties. These service activities will only be available to NY Rising applicants. Service providers must prioritize client referrals from NY Rising and coordinate with the services provided by their on-going case management teams, if requested. For additional information, please visit the GOSR NOFA page at <http://stormrecovery.ny.gov/doing-business-with-gosr/nofas>.



## TD Foundation Grant Window Open

The TD Charitable Foundation is now accepting applications for its 2015 Housing for Everyone grant competition.

A total of \$2.5 million will be awarded this year to 25 local non-profit organizations that make a meaningful difference in meeting the affordable housing needs in communities served by TD Bank, America's Most Convenient Bank®.

The theme of this year's competition is Affordable Housing for Seniors; which will seek the creation of safe, clean, physically accessible housing for older persons (aged 55 and over). Access to clean, safe affordable housing throughout the TD Bank footprint affects thousands of low- and moderate-income senior citizens who cannot afford a place to live.

This year's competition seeks to focus on initiatives that will provide Affordable Housing for Seniors through the creation of new sustainable units that provide safe affordable housing for senior citizens.

Applications for funding must

### Mortgages Larger Than \$500,000 Remain Rare Across United States

A new National Low Income Housing Coalition analysis of Home Mortgage Disclosure Act (HMDA) data finds that only 4.6% of mortgages issued nationwide between 2011 and 2013 were larger than \$500,000. The United for Homes Campaign proposes lowering the portion of a mortgage for which the interest can be deducted from \$1 million to \$500,000. This strategy was proposed as an alternate funding source for the national housing trust fund.

focus on:

- Preservation/Rehabilitation/Expansion of viable existing affordable housing properties: This may include the redesign, reconfiguration and or re-use of existing space in affordable housing properties to create increased quality and quantity of affordable housing units for senior citizens (aged 55 and over). Upgrades to systems, structure and efficiency of properties to preserve and prolong their use will be considered.
- Focus on Senior Citizens: Housing programs and services that address the unique needs of senior citizens in urban, suburban, and rural communities will be viewed favorably. This may include but is not limited to access to healthcare and medical services, public transportation, shopping, and recreational facilities as well as on site services (elder care, exercise/fitness programs, community rooms, etc.) that would be attractive and

supportive to senior citizens and their families.

- Utilization of abandoned properties to create new units of affordable housing: In urban, suburban and rural areas, the utilization of underused or abandoned properties to provide permanent or interim housing for low- and moderate- income individuals provides a tremendous opportunity to reverse neighborhood and community decline.

Special consideration will also be given to those initiatives that focus on energy efficiencies to be realized through foundation funding. Applications will only be accepted through the TD Charitable Foundation's online application system and should be submitted by 4:00 PM on September 4, 2015. Paper applications will not be accepted. Notification of awards will be made by mid November 2015. The online application and additional information about the grant competition are available at [www.tdbank.com](http://www.tdbank.com) (click on 'Our Community').

### Fair Housing Revised Rule, Cont'

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of the priority contributing factors, giving the highest priority to factors that limit or deny fair housing choice or access to opportunity, or that negatively impact compliance with fair housing or civil rights law. Goals can vary, as long as the goals address significant contributing factors and related fair housing issues, and can be reasonably expected to affirmatively further fair housing.

HUD published two versions of the Assessment Tool, and seeks public comment regarding the options. The formats don't differ in content; the difference is placement of the analysis of contributing factors.

The PD&R Assessment Tool webpage is at [www.huduser.org/portal/affht\\_pt.html#affhassess-tab](http://www.huduser.org/portal/affht_pt.html#affhassess-tab).

- Option A Assessment Tool is at [www.huduser.org/portal/sites/default/files/pdf/AFFH\\_Assessment-Tool\\_OptionA.pdf](http://www.huduser.org/portal/sites/default/files/pdf/AFFH_Assessment-Tool_OptionA.pdf).
- Option B Assessment Tool is at [www.huduser.org/portal/sites/default/files/pdf/AFFH\\_Assessment-Tool\\_OptionB.pdf](http://www.huduser.org/portal/sites/default/files/pdf/AFFH_Assessment-Tool_OptionB.pdf).
- The link to a beta test version of the Data and Mapping Tool is at <http://affht.vsolvit.com>.
- Assessment Tool Data Documentation is at [www.huduser.org/portal/sites/default/files/pdf/AFFH\\_Documentation\\_forPublic\\_07072015](http://www.huduser.org/portal/sites/default/files/pdf/AFFH_Documentation_forPublic_07072015).

## HUD Publishes Revised Fair Housing Assessment Tool

On July 16th, HUD published a revised Assessment Tool to be used to complete an Assessment of Fair Housing as required by HUD's new affirmatively furthering fair housing rule. HUD also published a notice describing revisions made to the initial Assessment Tool, which was published for comment on September 26, 2014. The revised Assessment Tool reflects changes made in response to comments, and is open to further public comment until August 17th.

The official Federal Register version of the final AFFH rule was also published on July 16th. HUD also posted a short FAQ and a one-page Fact Sheet on AFFH.

The revised Assessment Tool is designed primarily for Community Development Block Grant (CDBG) entitlement jurisdictions and entitlement jurisdictions partnering with public housing agencies (PHAs) submitting a joint AFH. It is also designed for local governments and HOME program consortia required to submit a Consolidated Plan as well as regional collaborations. Collectively, HUD is calling all of the above either "entitlement jurisdictions" or "program participants." HUD will issue separate Assess-

ment Tools for states and PHAs submitting independent AFHs.

HUD also released examples of nationally-uniform data and maps that HUD will provide to each program participant. The Assessment Tool consists of a series of questions designed to help program participants identify racially and ethnically concentrated areas of poverty, patterns of integration and segregation, disparities in access to opportunity, and disproportionate housing needs, all of which are defined in the rule and described further in the Assessment Tool. HUD notes that the Assessment Tool asks questions that enable program participants to perform a meaningful assessment of key "fair housing issues" and "contributing factors," and to set meaningful fair housing goals and priorities. Fair housing issues and contributing factors are defined in the rule and described further in the Assessment Tool, which gives 39 examples of contributing factors.

Many entitlement jurisdictions will not be required to use the Assessment Tool or be required to submit an AFH, which is tied to their next 5-year ConPlan, until 2020 or after. In addition, compliance dates are delayed an additional year for

states, entitlement jurisdictions receiving less than \$500,000 in CDBG in 2015, and PHAs with more than 550 public housing units or vouchers, combined. Until program participants are required to submit an AFH using the Assessment Tool, they are to continue to use the current Analysis of Impediments process.

The final AFFH rule requires program participants to use local knowledge and information in addition to HUD-provided data. The rule defines these terms, and the revised Assessment Tool provides examples of local information to include, for instance, housing market and housing stock information, laws and policies, and common neighborhood or area names and borders. As required by the rule, information obtained through the community participation process must also be considered.

The revised Assessment Tool requires program participants to identify contributing factors that significantly impact specific fair housing issues. They must also assign priorities to contributing factors and provide a narrative justifying the priorities. Program participants must set goals for overcoming the effects

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Visit our website at [www.ruralhousing.org](http://www.ruralhousing.org)  
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*Illegitimi Non Carborundum*