

IMPEDIMENTS TO FAIR HOUSING 2011 UPDATE City of Pittsfield



The update to the analysis of impediments studies practices in use in Pittsfield that are barriers to individuals in their search for housing.

**Massachusetts Fair Housing Center
May 2012**

I. INTRODUCTION

Fair Housing is the right of individuals to obtain housing of their choice free from discrimination. The Federal and State Fair Housing Laws prohibit discrimination in the rental and sale of housing for protected class members. The Fair Housing Act, and its subsequent amendments, is the federal law that governs fair housing. In addition to federal laws, some states have adopted fair housing and anti-discrimination laws. Massachusetts General Law Chapter 151B is the governing statute extending additional fair housing protections to individuals in the Commonwealth. Protected class members under the Federal laws include individuals based on their race, color, national origin, religion, sex, familial status, and disability. Massachusetts law additionally protects individuals based on their age, marital status, sexual orientation, gender identity and expression, military or veteran status, ancestry, receipt of public assistance, receipt of housing subsidies or rental assistance, and genetic information. Determining that an action is discriminatory depends on the nature of the denial and the conditions involved. These conditions are defined by statute and delineated by case law. Each situation should be determined on a case-by-case basis.

The purpose of the report is to provide an update about the current state of the City's housing market. The Impediments to Fair Housing Update 2009 was issued in March 2010 and the 2005 Analysis of Impediments preceded that document, thoroughly analyzing the impediments to fair housing in Pittsfield. The analysis of impediments is an examination of many housing policies and practices as well as other policies and practices in use that inadvertently or deliberately prevent people from living where they choose.

The Massachusetts Fair Housing Center is working with the City of Pittsfield Office of Community Development using funds from Community Development Blocks Grants. This allows MFHC to perform an analysis update to determine what impediments exist to fairness and equal opportunity for Pittsfield's citizens in their choice of housing. The update should be used as a tool in order to assist the City of Pittsfield in determining what actions need to be taken to affirmatively further fair housing and in the creation of their annual action plan for fair housing activities.

This update examines not only recent statistical data related to housing within the City of Pittsfield, but looks closely at affordability, land use and zoning, banking and lending, advertising, fair housing services, accessibility for individuals with disabilities, neighborhoods of concern and revitalization challenges, and fair housing complaints and lawsuits. This update will examine the years 2008 to 2010 and additionally look at some 2011 data where available.

The U.S. Department of Housing and Urban Development (HUD) defines impediments to fair housing as any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restrict – or have the effect of restricting – housing choice or the availability of housing choice. Policies,

practices or procedures that appear neutral on their face but which restrict the availability of housing may constitute such impediments.

As part of the Consolidated Plan, the City of Pittsfield is required to submit to HUD certification of affirmatively furthering fair housing, which requires the City to undertake fair housing planning by:

- Completing an Analysis of Impediments to Fair Housing Choice;
- Taking Actions to overcome the effects of any impediments identified through the analysis; and,
- Maintaining records reflecting the analysis and any actions taken.

The principle source of the 2005 analysis of impediments performed by the Housing Discrimination Project d/b/a/ Massachusetts Fair Housing Center (herein “MFHC”), which included both a community profile and a housing profile, was the 1990 and the 2000 U.S. Census. The key findings in this report are based on data from the U.S. Census Bureau American Community Survey, 2008-2010. Since the 2010 census does not account for 2011 data, it should be noted that this data is only an estimate and data tables have been included at the end of the report as source material.

The scope of our investigation for the purposes of this update was based upon a review of the City demographics, a review of current housing data, a review of the 2009 update on the analysis of impediments and changes to the impediments to fair housing, a review of other applicable recent data as related to this analysis, and individual and small group interviews with social service agencies.

II. COMMUNITY & HOUSING PROFILE KEY FINDINGS

- **Population of City**

In 2008-2010, the population was recorded as 44,729. Of that figure, 45.87% were male and 54.1% were female. In terms of ages of residents, the median age of Pittsfield City residents was 42.5 years of age, with 15.3% being under 18 years of age and 18.5% being over 65. Additionally, in 2008-2010, 90.4% of the civilian labor force ages 16 and older were employed while 9.5% were unemployed.

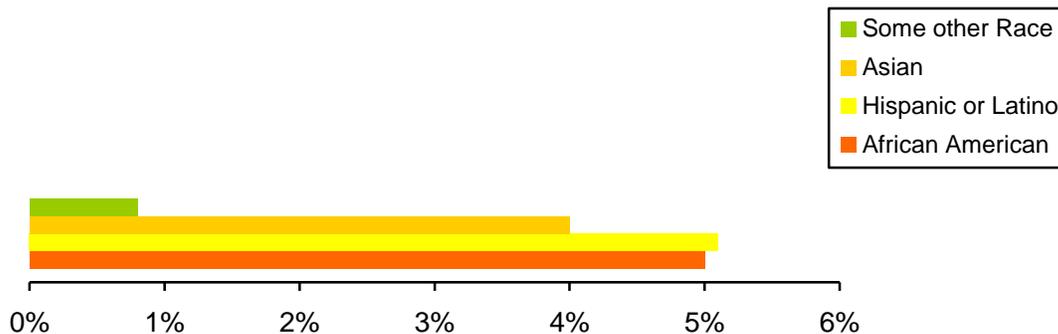
- **Disabled Population of City**

The 3-year estimates for 2008-2010 for the City of Pittsfield estimate that 16.1% of the noninstitutionalized population is disabled. That number includes 13.2% of the population ages 18 to 64 and 37.5% of the population ages 64 years and over.

- **Race and Ethnicity**

In 2008-2010 for individuals reporting one race, 92.6% was white, 5% was African American or black, 0.2% was American Indian or Alaska Native; 4% was Asian; 0.04% was Native Hawaiian and Other Pacific Islander, and 0.8% was some other race. In 2008-2010, 3.1% of individuals reported being two or more races and 5.1% were Hispanic or Latino, while 94.8% were white and not Hispanic or Latino.

Estimated Percentage of Population that is Non-White



- **Households and Families**

In 2008-2010, there were 20,047 households in Pittsfield city. The average household size was 2.16 people and families made up 55.2% of the households in Pittsfield city. The familial households include 36.33% of married-couple family households and 18.89% were composed by other families. Non-familial households made up 44.77% of all households in Pittsfield city.

- **Income**

In 2008-2010, the median income of households in Pittsfield city was \$41,297. Households with earnings as income totaled 72.7% and those with income of Social Security or Supplemental Security Income totaled 41.3% of households. Some individuals received income from more than one source. The average income from Social Security was \$13,843 and the mean earnings totaled \$58,295.

- **Geographic Mobility**

In 2008-2010, 95.67% of people living in Pittsfield city were living in the same residence as one year earlier. Of White residents, 88.5% were in the same residence as one year earlier, 8.9% moved to a residence within the same county, 0.5% moved to another county within Massachusetts, 1.8% had moved to another state and 0.05% had moved from abroad. Of African American residents, 67.2% were in the same

residence as one year earlier, 9% had moved within the same county, 10.2% moved to another county within the state, 13.9% moved from Massachusetts to a different state, and 0% had moved from abroad.

2008-2010 Housing Tenure



- **Education**

In 2008-2010, 90.5% of people 25 years and over had at least reached the level of high school graduate. Additionally, 14.8% had attained a bachelor’s degree and 10.98% had attained a graduate or professional degree. The percentage of individuals who had not graduated from high school was 9.4%.

The total school enrollment for ages 3 and over in Pittsfield city was 23.27%. Nursery school and kindergarten enrollment was 1,010 and elementary and high school enrollment was 6,526. Of the Pittsfield city population 18 to 24 years (3,355 people), 35.1% or 1,177 students were enrolled in college or graduate school which is a significant decrease from the 2,400 students enrolled in 2006-2008. In 2008-2010, the educational attainment of householders was as follows: 33.1% of householders had a high school diploma or the equivalency of one while 26.4% had received a bachelor’s degree or higher.

- **Industries**

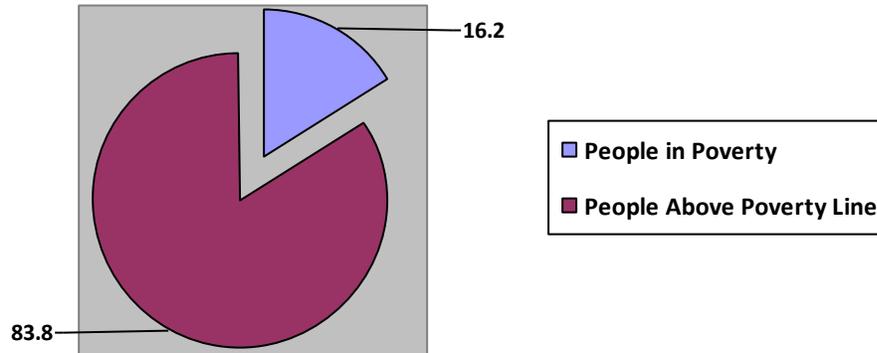
In 2008-2010, for the employed population 16 years and older, the leading industries in Pittsfield city were educational services and health care (30.6%), retail trade (13.59%), arts and entertainment and food and service accommodation (11.28%), and manufacturing (9.8%).

- **Poverty and Participation in Government Programs**

In Pittsfield City, 16.2% of people were in poverty in 2008-2010. The percentage of related children under 18 years who were living below the poverty level was

21.6% and the percent of people 65 years and older living below the poverty level was 11 percent. In 2008-2010, 11.7% of all families were living below the poverty level. 4.3% of families came from married-couple families while 30% of female-headed families were living below the poverty level. In addition, 11.9% of families living in Pittsfield received Supplemental Social Security and/or cash public assistance income within the last twelve (12) months.

2008-2010 Poverty Data in Pittsfield, MA



- **Housing Characteristics**

In 2008-2010, there were a total of 21,860 housing units in Pittsfield. Of that figure, 1,813 units, or 8.3% of housing units in Pittsfield were vacant. Of the total housing units, 56.5% were single-unit structures, 42% were in multi-unit structures, and 1.4% was mobile homes.

- **Occupied Housing Unit Characteristics**

Pittsfield had 20,047 occupied housing units in 2008-2010. Of the 20,047 occupied housing units, 60.1% were owner-occupied housing units and 39.9% were renter-occupied housing units. The number of households that did not have telephone service available totaled 1.7% of the occupied housing units. Additionally, 14.9% of households did not have a vehicle available while 42.8% of households had one vehicle available and 31.3% had two vehicles available.

- **Housing Costs**

The median monthly housing costs for mortgaged owners was \$1,368, while non-mortgaged owners had median housing costs of \$560 per month. In 2008-2010, there were 42.6% of mortgaged owners spending thirty percent or more of their household income on housing compared with the 21% of non-mortgaged owners and 52% of renters. The median gross monthly rent in 2008-2010 was \$727.

III. FAIR HOUSING REVIEW

A. Affordability

During the 1970s and early 1980s, Pittsfield built a significant number of public housing developments for low income households, the elderly, and the disabled. According to the MassHousing 2012 Housing List, there are 16 complexes within Pittsfield that are financed and/or overseen by MassHousing that are affordable in nature. Additionally, there are 11 developments that are financed and/or overseen by MassHousing that are Section 8 apartments open to families and elderly residents.

The Massachusetts Commission on Public Housing recently released a mapping series in April 2012 depicting State and Federal Public Housing and Voucher availability. (Exhibit A). The series showed that there are 1,000-1,999 total federal and state public housing units and vouchers within the housing authority in Pittsfield. The City of Pittsfield has between 100 and 199 total federal public housing units and between 500 and 1,000 total state public housing units within the Pittsfield Housing Authority. The housing authority maintains ten residential developments for families, elderly individuals and disabled individuals. Additionally, the recently released mapping shows that there are currently 41 federal Section 8 vouchers within Pittsfield. These maps further depict the lack of affordable housing in the communities surrounding the city of Pittsfield.

B. Land Use and Zoning

Zoning regulations have been examined to determine if the city encourages development and maintenance of affordable housing or imposes barriers to the detriment of affordable housing.

Inclusionary zoning promotes fair housing choice by directly allocating a percentage of new housing to low and very low income residents. Recent zoning ordinance No. 1021, passed in 2008, creates a “Downtown Smart Growth Overlay District” which fosters affordable housing opportunities for individuals in Pittsfield. Originally, Ordinance No. 1019, which preceded Ordinance No. 1021, provided that for all projects with twelve (12) or more dwelling units, not less than 20% of those shall be constructed for affordable housing. Ordinance No. 1021, which amended No. 1019, now states that “residential developments of five (5) units or more...shall provide no less than twenty (20) percent of the total number of dwelling units...as Affordable Units...” (Exhibit B). This ordinance is a prime example of inclusionary zoning that promotes accessibility to housing for low income individuals.

Due to the aging of property, foreclosures, lack of community housing funds and a poor economy, vacant properties continue to remain an issue. Between 2008 and 2010, the city of Pittsfield had a total of 21,860 housing units, 1,813 of which were vacant housing units. These properties can become a public safety hazard, which may in turn become a haven for illegal activities, thus further reducing the value of abutting property owners. Additionally, the amount of single-family new construction building permits has

decreased in recent years. In 2008, 20 buildings were issued permits, in 2009, 20 buildings were issued permits, and in 2010, 12 buildings were issued permits. This is a substantial decline even from 2007, in which 73 buildings were issued permits.

C. Banking and Lending Policies

Equal opportunity to credit and fair lending is one of the cornerstones of fair housing. According to the Home Mortgage Disclosure Act, 480 loans were originated in the City of Pittsfield in 2008 and 392 were originated in 2009. The data of loan origination in the City has been on a steady decline over roughly the past ten years. In 1999, for example, the city had originated 623 loans and in 2000, the city originated 587 loans.

In 2011, Pittsfield had six different banking and lending institutions within the city that were each comprised of several branches. A number of Community Reinvestment Act Performance Evaluations (Evaluation) that were completed by the Division of Banks and the Federal Deposit Insurance Corporation from 2008-2010 were reviewed in order to analyze local lending policies. The evaluations that were analyzed include the 2008 Evaluation from Pittsfield Co-Operative Bank, the 2009 Evaluation from Berkshire Bank, and the 2010 Evaluation from Lee Bank.

The 2008 Evaluation from Pittsfield Co-Operative Bank yielded no evidence of discriminatory or other illegal credit practices being implemented by the bank. The evaluation also showed that the amount of lending provided to minority applicants was aggregate with other assessment reports within the area, yet of the 48 employees that Pittsfield Co-Operative Bank employed in 2008, none of them were bi-lingual.

The 2009 Evaluation from Berkshire Bank additionally yielded no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs. A municipal representative quoted within the evaluation indicated that following the recent economic downturn in Pittsfield, lending by local banks has been a key to this downtown recovery, and Berkshire Bank has been a leader in local lending efforts, including aiding in the creation of several consortium loans for redevelopment.

The 2010 Evaluation from Lee Bank yielded no evidence of discriminatory or other illegal credit practices being implemented by the bank. The Evaluation noted that of the 21 cities and towns in which Lee Bank operates, the lowest income census tracts in which the Bank is located can be found in Pittsfield. In 2010, the Evaluation showed a very low minority application flow but of the branches, the Pittsfield location received the majority of minority applications.

D. Advertising

Discriminatory advertising is a consistent problem in the Commonwealth of Massachusetts. 42 U.S.C. § 3604 (c) makes it unlawful to “make, print, or publish, or

cause to be made, printed or published any notice, statement, or advertisement, with respect to the sale of rental of a dwelling that indicates any preference, limitation, or discrimination based on membership in a protected class, or an intention to make any such preference, limitation, or discrimination.”

MFHC has previously worked with the local daily newspaper to assist them in affirmatively furthering fair housing in its housing advertising and in supporting fair housing activities throughout the county.

Additionally, MFHC has been periodically monitoring local advertising in Pittsfield City to ensure that there are no discriminatory advertisements being published. In 2010, MFHC monitored local news media on 6 different occasions to ensure compliance with federal and state fair housing laws.

MFHC has been placing advertisements in the local daily newspaper, explaining that there is assistance available from MFHC for foreclosure rescue scam victims and for victims of housing discrimination. MFHC is currently placing regular advertisements in the local daily newspaper warning individuals of housing discrimination and explaining the services that can be provided for those who are victims of housing discrimination.

E. Accessibility for Individuals with Disabilities

Individuals with physical and mental disabilities are statutorily protected from housing discrimination. AdLib, Inc., a non-profit independent living center located in Pittsfield, has been working with MFHC to further the educational and outreach efforts to the disabled community of Pittsfield. MFHC contacted AdLib to gain their perspective on the impediments to fair housing for disabled individuals that they have experienced in recent years.

According to AdLib Executive Director, Joseph Castellani, there is no clear pattern of discrimination against individuals with disabilities in the city of Pittsfield. Mr. Castellani did, however, express his agency’s concern for a lack of affordable and accessible housing within the city. Mr. Castellani also stated that his agency has worked with many individuals who have found themselves in substandard housing due to a lack of better alternatives and that the owners of these substandard units will often refuse to make needed changes especially in regards to accommodating an individual’s disability.

F. Neighborhoods of Concern and Revitalization Challenges

In the 2009 Update to the Analysis of Impediments for the City of Pittsfield, two specific neighborhoods, West Side and Morningside, were referenced as the areas that comprise the highest level of private affordable housing in Pittsfield and as the areas that had unusually high rates of unoccupied housing. Two separate action plans were created for each of these neighborhoods in 2006 and in 2009, a report was released analyzing data gathered by GLC Development Resources Inc. and compiled and analyzed by the City of Pittsfield.

The report had issued two recommendations for these neighborhoods that would have a positive impact on affirmatively furthering fair housing and reducing impediments to fair housing for the City. The first recommendation involved the continuation of support to the efforts of the code enforcement team which works to take action against vacant or blighted properties. The second recommendation involved the Weatherization and Heating Improvement Program, that would involve bringing substandard housing into better condition in these areas by working with smaller landlords there.

As of 2011, the West Side Neighborhood Initiative and the Morningside Initiative, that have been in existence since 2002, have been working with the City of Pittsfield to improve the housing stock in these communities. In July 2011, the City and Habitat for Humanity broke ground in the West Side neighborhood on Prospect Street where a number of blighted properties were located for quite some time. According to press coverage on the event, the Prospect Street site is one of five locations that the city will address with \$1.5 million in state funding from the City's Department of Housing and Community Development.

IV. MASSACHUSETTS FAIR HOUSING CENTER DATA

A. Fair Housing Services

MFHC works in conjunction with the City of Pittsfield to provide fair housing services to the residents of the city. MFHC regularly provides community education, community outreach, and enforcement and monitoring activities to the residents of the City of Pittsfield.

Between January 1, 2010 and December 31, 2011, MFHC distributed materials to the following organizations within the City:

- American Red Cross
- Berkshire Area Health Education Center
- Berkshire Central Labor Council
- Berkshire Center for Families & Children
- Berkshire Community Action Council
- Berkshire County Bar Advocates, Inc.
- Berkshire County House of Corrections
- Berkshire County Kid's Place
- The Berkshire Eagle
- Berkshire Family and Individual Resources
- Berkshire United Way
- City of Pittsfield
- Community Legal Aid
- Elizabeth Freeman Center
- Employment Law Center of Western Massachusetts
- Habitat for Humanity
- Massachusetts Department of Transitional Assistance
- National Alliance on Mental Illness of Berkshire County

- Passages for Healthy Families
- Pittsfield Boys and Girls Club
- Redfield House
- WIC – Berkshire North Program

MFHC materials are available in both English and Spanish. MFHC literature additionally provides specific information on certain prevalent issues within the City, namely protection for individuals who receive public assistance, protection for disabled individuals, and protection for families with young children in regards to lead safe housing.

MFHC provides fair housing and fair lending trainings throughout the city of Pittsfield when organizations, landlords, community groups, etc. request them. In 2010 and 2011, four fair housing and lending trainings were provided for groups in Pittsfield. MFHC has recently taken on a huge effort to increase education and outreach efforts within the city of Pittsfield. This fiscal year, MFHC has already completed five fair housing trainings within the city and provided materials to four organizations within Pittsfield. MFHC has also been working closely with the Berkshire County Landlord's Association and will be attending their meeting in June to provide guidance on fair housing issues to landlords doing business within the city.

In 2010, MFHC performed 20 audit tests which resulted in three positive tests for public assistance discrimination. Additionally, MFHC has periodically staffed their Pittsfield Office, located at 314 Columbus Avenue, and uses that location as needed to meet with clients and provide tester as well as fair housing trainings.

B. Fair housing complaints and lawsuits

The federal Fair Housing Act prohibits discrimination on the basis of race, color, national origin, religion, sex, familial status and disability. Between 2004 and 2007, MFHC received 43 complaints from residents of Pittsfield. The top three complaints received by the Housing Discrimination Project were based on disability, familial status and receipt of a housing subsidy.

Between 2008 and 2011, MFHC received 58 complaints of housing discrimination from residents of Pittsfield. However, the yearly average of complaints between these yearly time periods did in fact decrease. In 2008 there were 22 complaints, in 2009 there were 14, in 2010 there were 13, and in 2011 there were 9 complaints of discrimination brought to MFHC by residents of Pittsfield.

During the period of 2004-2011, MFHC settled ten fair housing complaints, whereby plaintiffs received more than \$150,000 in cash and services as compensation for damages.

Figure 1 –Housing discrimination complaints between 2004 and 2007.

PITTSFIELD COMPLAINTS- 2004-2007					
	04	05	06	07	Total
Disability	3	2	1	7	13
Familial Status	3	4	0	1	8
Race	2	1	0	3	6
National Origin	2	1	0	1	4
Public Assistance	3	3	1	2	9
Source Income	0	1	0	0	1
Other	0	1	0	1	2
TOTAL	13	13	2	15	43

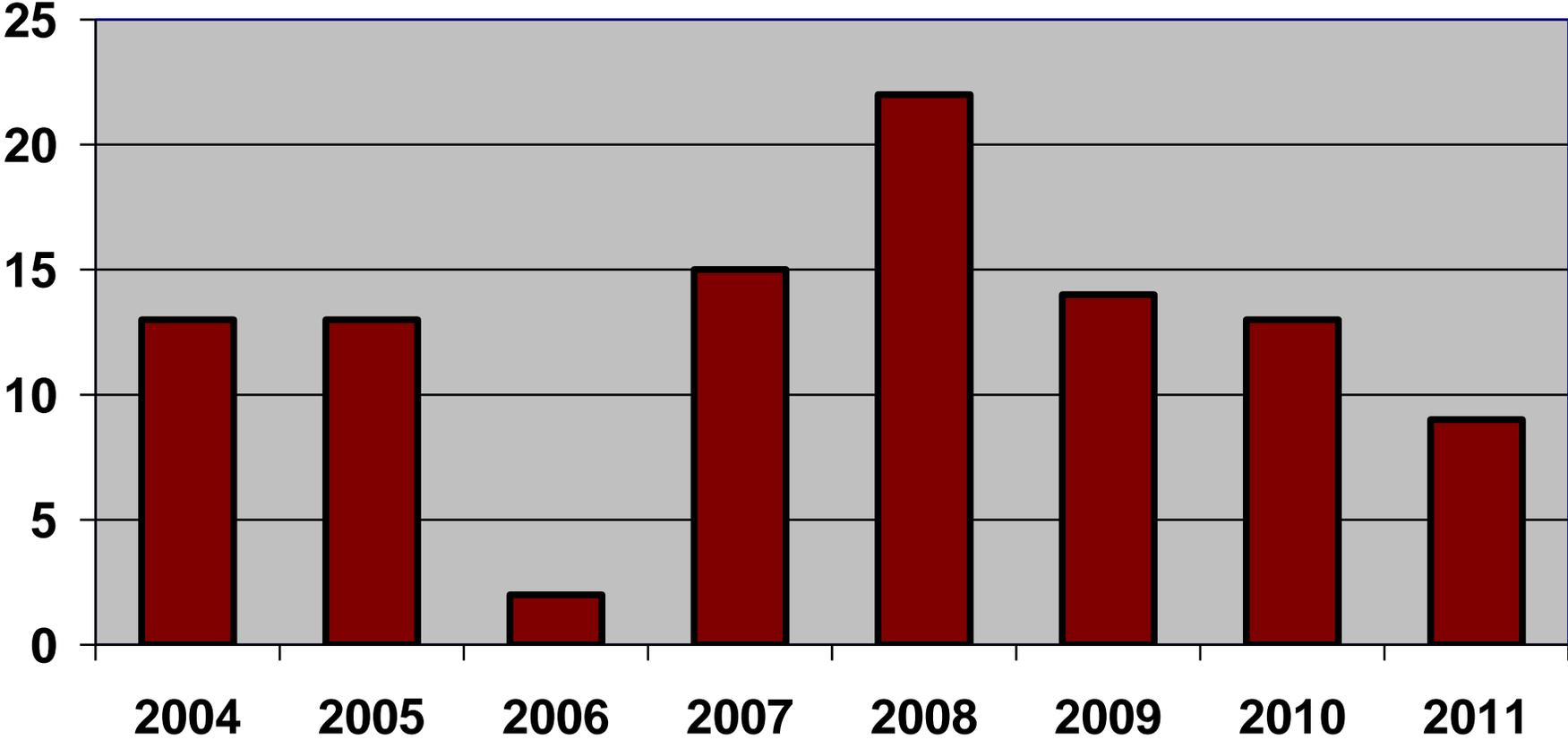
Source: Housing Discrimination Project, Inc. / Massachusetts Fair Housing Center

Figure 2 –Housing discrimination complaints between 2008 and 2011.

PITTSFIELD COMPLAINTS- 2008-2011					
	08	09	10	11	Total
Disability	4	5	1	1	11
Familial Status	7	3	3	2	15
Race	2	1	0	0	3
National Origin	1	1	0	0	2
Public Assistance	5	3	3	1	12
Source Income	0	1	0	0	1
Other	3	0	6	5	14
TOTAL	22	14	13	9	58

Source: Housing Discrimination Project, Inc. / Massachusetts Fair Housing Center

Total MFHC Pittsfield Complaints 2004-2011



V. IDENTIFICATION OF IMPEDIMENTS

A. The following impediments to fair housing in Pittsfield were identified in the 2005 analysis (1-9) and the 2009 update (10-16):

1. There is distinct concentration on racial/ethnic minorities located in specific census tracts.
2. There are significant disparities between the urban core and the rest of the city for virtually every measure of income available.
3. While the majority of low-income households are white, minority populations have a much higher incidence of poverty and are far more likely to reside in areas of low-income concentration.
4. Minorities experience mortgage loan denial rates which are two to three times greater than white applicants.
5. There is an imbalance between rental and home ownership in specific census tracts.
6. The age of housing stock and the prevalence of lead based paint hazards.
7. There is a lack of handicapped accessible housing units.
8. Extremely low vacancy rate.
9. Discriminatory housing practices.
10. The most prevalent forms of discrimination in Pittsfield were against families with children under the age of six and persons receiving public assistance due to the age and condition of housing stock and the prevalence of lead based paint hazards.
11. Certain neighborhood conditions exist that may discourage potential renters and property owners from residing in or purchasing housing, i.e. high incidence of drug related crime, vacant housing and the quality of existing housing.
12. A majority of the City's section 8 certificate and voucher holders reside in low income neighborhoods and also a greater majority of minority Section 8 certificate and voucher holders reside in neighborhoods of both minority and low income concentrations.
13. There is a distinct concentration of racial/ethnic minorities located in specific census tracts. While the majority of low-income households are white, minority populations have a much higher incidence of poverty and are far more likely to reside in areas of low-income concentration.
14. There is an imbalance between rental and home ownership in specific census tracts and based on race and ethnicity.
15. There is a general lack of understanding of fair housing law by residents and housing providers.
16. Violations of fair housing law do occur, particularly in rental markets.

B. Current identified impediments of fair housing in Pittsfield City:

1. There is a lack of accessibility to banking services for individuals who have a limited English proficiency.

2. There is a lack of accessible housing for disabled individuals.
3. There are a large number of vacant or blighted properties within the City with 1,113 units, or 8.3% of housing units in Pittsfield being vacant.
4. Between 2008 and 2010, the percentage of African Americans leaving Pittsfield was greater than that of White individuals. There was also a higher rate of white residents remaining in the city than that of African Americans.
5. There is a general lack of understanding of fair housing law by residents and housing providers.
6. Data from the Massachusetts Fair Housing Center indicates that housing discrimination remains a serious problem in Pittsfield, especially for individuals based on disability, familial status, or receipt of public assistance.
7. The age of the housing stock and the prevalence of lead based paint hazards contributes to housing discrimination against families with children.

VI. RECOMMENDATIONS

A. Strengthen Education and Outreach Efforts

- Continue to provide education and outreach efforts to the community on their fair housing rights under federal and state fair housing laws. Materials with such information should be made available to residents through local social service agencies and other community events and should provide fair housing resource information to individuals including how to file a complaint of discrimination with HUD and MCAD.
- Education and outreach efforts need to be provided in multiple languages other than solely English. All materials should be available in both English and Spanish and should be made available in other languages as requested.
- Education should be provided to non-profit agencies, community groups, housing providers, tenants, first-time home buyers, real estate agencies.
- Work with community agencies that assist with individuals with Limited English Proficiency (LEP) to increase their understanding and awareness of resources available and to create those resources in languages other than English.
- Educational efforts to housing providers should be heavily based in fair housing for individuals with disabilities in order to educate about the equal access to housing that disabled individuals are entitled to.
- Educational efforts to housing providers should provide information about the dangers of lead paint, the legal requirements under Massachusetts lead paint laws and the programs that are available to defray the costs of de-leading a property.

B. Create Affordable, Accessible Housing

- The city should seek out every possible resource to create new and preserve the existing supply of affordable housing in Pittsfield and the surrounding

region in an effort to overcome the lack of affordable housing and integrated neighborhoods within and around the City.

- Continue to create programs to promote the re-development of vacant or blighted properties within the city.
- Work with local public housing authorities to promote community diversity by encouraging minorities and limited English speaking mobile voucher holders to find housing outside of the urban core.
- Work with local organizations to assess needs for affordable and accessible housing.

C. Investigate Fair Housing Issues within the City

- In an effort to create a more inclusive City, investigate the trend of ethnic/racial minorities leaving Pittsfield and determine why these individuals are choosing to leave the City.
- Work with local disability service agencies, such as AdLib, Inc., to assess the housing needs of the disabled community within Pittsfield and determine ways in which to better serve those needs.

D. Foster Compliance with the Fair Housing Act

- Continue enforcement efforts by performing audit tests to determine if discriminatory practices are occurring.
- Continue to provide code enforcement activities which should include education on funds and programs available especially in terms of accessibility for people who are disabled under the Fair Housing Act and being compliant with the Massachusetts lead paint laws.
- Educate local advocates on fair housing and fair lending issues and how to recognize discriminatory practices as well as information about local, state, and federal resources which could assist should they suspect discrimination.
- Continue to work with the Massachusetts Fair Housing Center for the intake of housing discrimination complaints to promote the enforcement of the fair housing laws.