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FAMILY HOUSING
Advisory Services, Inc.

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FAIR HOUSING CENTER
OF NEBRASKA & IOWA

Off: (402) 934-6675 | Fax: (402) 934-7928

August 9, 2016

Ms. Crenna Brumwell
300 Main Street
Suite 330
Dubuque, IA 52001

RE: Request for Proposal: Fair Housing Testing Services & Trends in Housing Discrimination

Dear Ms. Brumwell,

Please accept the enclosed proposal for the above referenced project from the Fair Housing Center of NE-IA (the Center), a program of Family Housing Advisory Services Inc. (FHAS), a Nebraska not-for-profit Corporation. Included in the proposal you will find the work plan/approach, the firms' history and prior experience, references, the qualifications of the project team, the ability to perform the required services and the total project cost.

This project is for twenty matched paired race-based, site visit, rental tests to be conducted and completed by November 15, 2016.

There will be two full-time Center staff with over 30 years combined experience who have coordinated over 2,700 matched pair tests assigned to this project. Our experience includes partnerships in which we have provided testing services for three (3) Fair Housing Assistance Programs (FHAPs) throughout the state of Iowa, including the Iowa Civil Rights Commission (ICRC), the Sioux City Human Rights Commission (SCHRC), and the Davenport Civil Rights Commission (DCRC).

If you have any questions regarding the proposal, please feel to contact me at 402-934-6669 or by email joe@fhasinc.org.

Sincerely,

Joe Garcia

Joe Garcia, Program Director
Fair Housing Center of NE-IA

Certified by the United States Department of Housing and Urban Development (HUD) to Provide Comprehensive Housing Counseling Service

TTD Access via the Nebraska Relay System

United Way

PROFILE OF THE FIRM:

Family Housing Advisory Services (FHAS), a Nebraska not-for-profit Corporation was established in 1968. Its mission is to improve the quality of life by eliminating poverty through housing stability and financial security. FHAS helps people prevent homelessness, become educated homeowners, learn their foreclosure prevention options, become financially-wise consumers, access affordable mortgage lending options, address housing discrimination, and overcome poverty. Our core programs are Tenant Services, Homeowner Services, Financial Education, the Earned Income Tax Credit (EITC) Coalition, and the Fair Housing Center of Nebraska and Iowa. We improve quality of life by stabilizing housing. We eliminate poverty through services that include budgeting, saving, individual development accounts (IDAs), asset development, credit repair, and access to tax credits.

While clients benefit from the holistic efforts of FHAS' comprehensive menu of services, the program submitting this Request for Proposal is the Fair Housing Center of Nebraska and Iowa (the Center), which provides education to eliminate discriminatory barriers to housing choice. The Center investigates, advocates, and conducts outreach and education to resolve issues related to housing. In addition, the Center operates the only HUD-approved fair housing testing program in Nebraska and Iowa.

The Center assists people to overcome barriers they encounter to access housing in the rental or purchase of a home or apartment, senior housing, public and subsidized housing, mobile homes, dormitories, and independent or assisted living facilities. We empower vulnerable populations by providing information needed to understand their rights and the laws that protect them from unfair practices and ensure stability in their housing. We protect people from housing discrimination based on Race, Color, Sex, Religion, National Origin, Disability, and Familial Status as well as Sexual Orientation and Gender Identity, which are also protected in Iowa.

WORK PLAN/APPROACH AND PROJECT SCHEDULE (20 points):

1. The Fair Housing Center of NE-IA will provide materials necessary for the training of fair housing testers, and will utilize the testing methodology currently approved by the U.S. Department of Housing and Urban Development for use by the Center in its Private Enforcement Initiatives (PEI) grants as a Qualified Fair Housing Organization (QFHO).
2. The Fair Housing Center of NE-IA will design and conduct a survey testing project to include a total of twenty (20) matched pair fair housing site tests of rental transactions within the city limits of Dubuque, Iowa. The focus of these tests will be:
    - Race
    - Race with the applicant possessing a Housing Choice Voucher
    - Rental housing where advertisements indicate "No Section 8" or "No Housing."
3. The time-frame for this project is September 1, 2016 through November 15, 2016.
4. The Fair Housing Center of NE-IA will provide the City of Dubuque with an analysis of the results of all fair housing testing conducted and any information required for reporting or investigative purposes.
5. During the term of this agreement, the Center will provide such data and compilations of data as needed by the City of Dubuque to report on the activities in a format and timetable acceptable to the City of Dubuque. Products of this contract including books and records of account shall be retained by the Fair Housing Center of NE-IA for a period of three years, during which time they shall be available for inspection by the City of Dubuque or its designated agent. All such records, including records of testing and testing products, remain the property of the Fair Housing Center of NE-IA at all times except as otherwise provided herein. The City of Dubuque and the Fair Housing Center of NE-IA agree there shall be no distribution of results or press releases without the consent of both of the parties.
6. The parties agree that the Center staff member coordinating the tests and the testers will be reasonably available for interviews by the Iowa Civil Rights Commission (ICRC) staff telephonically. In addition, should court action become necessary in specific test cases, the FHC staff and applicable testers will be available for depositions and testimony for the standard witness fee and travel expenses, if any.

7. The Center will evaluate conditions, both public and private affecting fair housing choice, as well as supply conclusions and recommendations for action, including actions to overcome identified trends, issues or instances of housing discrimination.
8. The Center will present conclusions and recommendation of actions to the City Council as well as in a community setting. The time-frame for the two (2) presentations will be in December 2016 (weather permitting) but may reach into 2017.

FIRM'S HISTORY, PRIOR EXPERIENCE (15 points):

FHAS has documented discrimination through the Fair Housing Center as a significant barrier to housing choice for 22 years. It has administered numerous projects similar in scope and complexity to this project since its inception. The Fair Housing Center has successfully administered 12 Fair Housing Initiatives Program (FHIP) grants from 1991 to the present, including three three-year Performance Based Funding Component (PFBC) Grants covering the years from 2005 to the present. Table 1 shows the HUD FHIP grants received from FY 2005-2015.

TABLE 1: HUD FHIP GRANTS 2005 TO PRESENT

GRANT	YEARS	AMOUNT OF GRANT	STATUS
FHIP-PEI-PBC	FY2005-2008	$825,000	Closed
FHIP-PEI-PBC	FY2009-2011	$825,000	Closed
FHIP-PEI-PBC	FY2011-2014	$975,000	Closed
FHIP-PEI-PBC	FY2014-2017	$975,000	Open *

This open grant is scheduled to be completed by November 30, 2017.

In its first year of performance-based funding, the Fair Housing Center was one of only 13 organizations nationally to be awarded such funding. The Center has significant experience in conducting fair housing assessments of clients' housing concerns and identifying and investigating fair housing allegations. Over the term of the current Performance Based Funding Component (PBFC) grant, the Fair Housing Center has completed 776 investigations of allegations of housing discrimination between 2011 and 2015.

In addition, the Center has a highly effective testing program to assess potential systemic violations of the Fair Housing Act and to develop possible evidence to assess allegations of fair housing violations. The Center has conducted testing throughout Nebraska and

Iowa as well as communities bordering South Dakota near the Native American reservations to identify potential systemic violations of the Fair Housing Act.

Between December 1, 2011 and November 30, 2015, the Center conducted 530 matched pair tests in compliance with its HUD-approved methodology and strictly adhering to FHIP regulations at 24 CFR 125.107. The testing program requires every tester to identify any felony convictions or convictions involving fraud or perjury prior to being trained as a tester, and criminal background checks are conducted on all testers before they are used in any test conducted. HUD tester requirements are explained as part of the training as well. Testers receive a standard payment per completed test part without regard to the outcome of those tests, and the test coordinator verifies that testers selected for a given test have no conflicts with the entities or persons being tested and are not licensed competitors.

Of the tests conducted between 2011 and 2015, 30 were real estate sales tests, 30 were lending tests, and 16 were design and construction tests, the remaining 454 were rental tests. The tests were conducted in the metropolitan areas of Nebraska and western Iowa, in smaller communities, and in the rural areas. The majority of tests focused on race, national origin, and disability. Currently, five (5) Substantially Equivalent Agencies (FHAPs) work directly with the Center's testing program and contract for testing services and/or accept tests with evidence to investigate in the name of that agency. The FHAPs include the City of Omaha's Human Rights and Relations Department, the City of Lincoln's Commission on Human Rights, the City of Sioux City, IA Human Rights Commission, the City of Davenport, IA Civil Rights Commission and the State of Iowa Civil Rights Commission. All five agencies contract with the Center and will review survey tests and consider filing them in their agency's name.

The qualifications and abilities of the Center staff to accomplish the activities of this project are clearly demonstrated by their highly successful management of 11 FHIP grants and the current PEI-PBFC three-year awards. The cumulative experience of FHAS staff establishes it as a Qualified Fair Housing Organization (QFHO). The Center has met or exceeded every measurable objective in all of its FHIP grants. The organization's expertise has been recognized by HUD, receiving a Best Practices Award in 2000 and a HUD Regional Award in 2008 for its "dedication and extraordinary creativity" in fighting housing discrimination. It has also received awards from both the City of Omaha (2001, 2011) and the City of Lincoln NE (2002, 2010) for providing outstanding fair housing services. In addition, the Center received two statewide awards (2000 and 2011) in Nebraska for its fair housing work with underserved populations.

REFERENCES (10 points):

1) Mr. Don Grove, Supervisor
   Iowa Civil Rights Commission
   Grimes State Office Building
   400 E. 14th Street
   Des Moines, IA 50319-1004
   (515) 281-0338, 1-800-457-4416

2) Ms. Karen Mackey, Executive Director
   Sioux City Human Rights Commission
   PO Box 447
   405 6th Street, Room 410
   Sioux City, IA 51102
   (712) 279-6985

3) Ms. Rhonda Uher, Compliance and Outreach Manager
   Omaha Human Rights and Relations Department
   City of Omaha
   1819 Farnam Street, Suite 502
   Omaha, Nebraska 68183
   (402) 444-5067

4) Ms. Kimberly Taylor-Riley, Executive Director
   Lincoln Commission on Human Rights
   555 South 10th Street, Suite 304
   Lincoln, NE 68508
   (402) 441-7625

5) Ms. Keirsten Anderson, Housing Analyst
   Davenport Civil Rights Commission
   226 W. 4th Street
   Davenport, IA 52801
   (563) 326-7888

QUALIFICATIONS OF THE PROJECT TEAM (10 points):

The Fair Housing Center of Nebraska-Iowa has a total of 58 years of staff experience with a nine (9) year average for its staff members. The staff resources to successfully implement this project include not just the staff of the Fair Housing Center, but also the staff of its parent agency, Family Housing Advisory Services Inc. (FHAS). FHAS has five major programs providing services to the community: homelessness prevention, homeownership education, tax assistance, financial education and credit repair, mortgage default counseling, as well as the full range of fair housing services of the Fair Housing Center of Nebraska and Iowa (the Center). FHAS is a multi-disciplinary HUD-certified housing counseling agency and the only Qualified Fair Housing Enforcement Organization (QFHO) in Nebraska and Iowa. The Fair Housing Center was established in 1994 and for 22 years has been working to end housing discrimination though its comprehensive testing, investigation of allegations, advocacy, education and outreach and mediation services. It is The Center carries out these activities through seven highly-trained and qualified staff members:

Program Director: Joe Garcia joined the Center in 2001 and holds an Associates of Arts degree in Paralegal Studies. He has 15 years direct experience in fair housing investigation and testing and has served as the Director of the Center for six (6) years. Prior to becoming the Program Director Mr. Garcia served as the Fair Housing Test Coordinator for nine (9) years and has coordinated over 2,000 matched pair tests. He has received specialized training from HUD including National Policy Conferences, the National Fair Housing Training Academy and National Fair Housing Alliance including advanced training on conducting real estate testing. Mr. Garcia is bilingual in Spanish/English and has significantly increased outreach and fair housing services to the Spanish-speaking immigrant communities in the Center's service area.

Fair Housing Investigator/Assistant Director: Leslie Seymore has eight (8) years of experience in the Center as a fair housing investigator and more than 26 years' experience in law enforcement, including investigations and supervision. She investigates all allegations of fair housing violations; ensuring complaints are jurisdictional and have the requisite documentation. She serves as a personal representative for complainants as needed. Ms. Seymore has specialized training from the US Department of Justice, Duquesne University's School of Leadership and Professional Advancement, the National Organization for Victim Assistance, HUD, the John Marshall Law School and the National Fair Housing Alliance. She is also trained in conflict resolution and mediation.

Fair Housing Test Coordinator: Carla Cox has 15 years of experience in fair housing testing and investigation, including seven (7) years as a volunteer tester for the Center. She coordinates the testing program, including the recruitment and training of testers and scheduling of tests. Ms. Cox has coordinated over 700 matched pair tests (1,800 test parts). She has received significant training from HUD, the US Department of Justice, John Marshall Law School and the National Fair Housing Alliance, including training in real estate sales testing. In addition, she has 4 years supervisory experience with training in management skills and customer outreach.

Fair Housing Intake Specialist/Data Manager: Gloria Robles has 18 years of experience providing bilingual intake services to clients and customers in both for profit and non-profit settings, including eight (8) years of fair housing experience. She has extensive experience and training in database entry and management, including Access. She handles all client intakes and assesses all contacts for possible fair housing issues. Ms. Robles has received training from the John Marshall Law School and the National Fair Housing Alliance. Ms. Robles is bilingual/bicultural (Spanish) and uses these skills with Spanish-speaking telephone and walk-in contacts, as well as providing education and outreach to the Spanish-speaking communities in the project's geographical area. In addition, Ms. Robles has been a fair housing tester for eight (8) years.

General Counsel-FHAS: Gary Fischer, JD has a strong background in civil rights litigation, including 31 years of experience in a legal services/poverty law environment and 19 years in fair housing law. He has significant direct experience in the mediation and litigation of fair housing cases and provides overall legal reviews of the Fair Housing Center's activities, ensuring complaints are jurisdictional and meritorious.

Executive Director-FHAS: Teresa Hunter has over 20 years of experience with FHAS, including 4 years as the Director of Investigations for the Center. She has a background in fair housing law and complaint processing. She holds a Juris Doctorate from Creighton University and a Master's in Public Administration.

Director-Operations: Ronette Steffes oversees all human resource and accounting functions of the agency. She maintains the agency's financial controls and all records related to internal and external financial audits.

ABILITY TO PERFORM REQUIRED SERVICES (20 Points):

The Center has two (2) qualified staff (Mr. Garcia and Ms. Cox) with over 30 years combined experience who have coordinated over 2,700 matched pair tests. In addition, the Center has at its disposal a total of approximately 20 trained fair housing testers, both male and female of various ethnicities, with a combined number of 96 years' experience, who have conducted over 1,000 tests for the Center.

TOTAL PROJECT COST (25 points):

The total cost to complete this project in full is twenty-four thousand dollars ($24,000). This shall be the maximum monetary obligation of the City of Dubuque, IA to the Fair Housing Center NE-IA. The expenses of the testers, including tester stipends, mileage, per diem, including hotel, if required, all at the 2016 federal rates, will be paid by the Center. Please consider this as the cost savings option (and the preferred option by the Center).

The second and more expensive option is $26,000. The difference between the two options is that the $24,000 option includes the Center using two (2) of its most experienced local Testers and one (1) Test Coordinator for this project.

The $26,000 option consists of the City of Dubuque recruiting 4 individuals to act as fair housing testers, insure the Testers are reliable and available when the Center's Test Coordinator is scheduled to be in-town to train these individuals as well as when the Test Coordinator schedules the tests to be conducted. In addition, the City of Dubuque would incur the costs associated for a 2nd Test Coordinator to be present with these inexperienced, newly-trained Testers.

RECOMMENDED SCOPE OF WORK:

As requested in the RFP, the Fair Housing Center of NE-IA would recommend to the city of Dubuque, IA to consider contracting for testing services to conduct a series of 15-20 telephonic matched tests with the scope of the work (basis) focused on Disability-companion/therapeutic animal.

In 2015, the Center investigated a total of 262 fair housing complaints. Of that number, 200 (76%) were based on disability. This overwhelming number is just not limited to Nebraska and Iowa, but it is nation-wide. Statistics show that over 50% of the fair housing cases investigated in the United States are for people with either a physical or mental disability or both. It is our experience that no matter wherever (town or city) the Center conducts these types of tests, housing providers continue to violate fair housing law.

The Center has conducted these tests both as site visits and by telephone. Due to the distance between our home-based office in Omaha, NE and Dubuque, IA, and all of the logistics and costs associated with that, the Center would recommend these tests be done by telephone. It would be a substantial cost savings to the city of Dubuque, and still get the same high-quality professionally conducted tests. In addition, city officials would get a good sampling on how people with disabilities are treated by housing providers in your city.