



Housing and Federal Grants Division 2024 - 2025 Application for Funding Community Development Block Grant Program

This application is for nonprofit organizations and government entities in Marin County, California who would like to apply for federal Community Development Block Grant program funds for Public Services or Community Infrastructure/Capital Improvements. Please refer to the [Application Guidelines](#) released on January 22, 2024 for detailed information about qualifications and application requirements. Applicants may use this [prep tool](#) for the long-form questions in order to save their responses and copy/paste into this application.

The deadline to apply is **5:00 p.m. Friday, February 16**. Applicants will receive a copy of their submitted application to the email address entered.

Indicate type of project. If your project allows, you may apply under multiple categories. (See Application Guidelines for more information)

Public Services (CDBG)

Organization (Fiscal Sponsor) General Information

Organization (Fiscal Sponsor)/Agency Name

Fair Housing Advocates of Northern California

Mailing Address

851 Irwin Street, Suite 218
San Rafael, California, 94901

Website (if applicable)

<https://www.fairhousingnorcal.org>

Organization DUNS#

362281065

Executive Director/CEO

Caroline Peattie

Email Address

peattie@fairhousingnorcal.org

Phone Number

(415) 483-7552

Project General Information

Program/Project Name

Fair Housing Counseling and Education

Program/Project Site Address

851 Irwin Street, STE 218
San Rafael, California, 94901

CDBG Funding Amount Requested (Minimum request amount: \$15,000)

85000

Application Contact Person

Caroline Peattie

Title of Contact Person

Executive Director

Contact Email Address

peattie@fairhousingnorcal.org

Contact Phone Number

(415) 483-7553

To determine if your project is located in a Special Flood Hazard Area as indicated by FEMA, visit [FEMA Flood Map Service Center](#). (Save a copy of the Dynamic Map and upload at the end of this application.)

Is this project located in a Special Flood Hazard Area as indicated by FEMA?

No

For CDBG Public Facilities/Improvements applications, if the project is located in a **Regulatory Floodway it is not eligible for funding**. Public Facilities/Improvements projects located in a Special Flood Hazard Area require flood insurance to qualify for funding.

Project Specifics

Planning Areas Served: Indicate what geographic area(s) the requested funding will serve.

Novato San Rafael County Other

Is your organization receiving other County of Marin funding for this project?

No

Organizational Overview: Provide a brief description of your organization including mission, programs, number of clients served, etc.

The mission of Fair Housing Advocates of Northern California (FHANC) is to ensure equal housing opportunity and to educate our communities on the value of diversity in our neighborhoods. FHANC is the only full-service fair housing agency in the area. We are the only agency certified by the U.S. Department of Housing and Urban Development (HUD) to provide foreclosure prevention and pre-purchase counseling/education in Marin, Sonoma, and Solano counties. In FY 2023-24, FHANC served 3,756 persons.

Project Description: Provide a detailed scope of work including services to be provided and/or development activities to be engaged. Describe how this project will benefit the community.

Services proposed: 1) fair housing counseling; 2) intervention/case investigation; 3) referral/representation in administrative complaints and lawsuits; 4) systemic discrimination investigations; 5) fair housing outreach/education; 6) Craigslist monitoring for discriminatory ads; and 7) AFFH consultation available to County as needed.

Benefits of services: expanding fair housing choice, helping residents remain housed, and educating housing providers and residents understand fair housing laws.

Which community priority does your project align with? (See Application Guidelines for descriptions) (check as many boxes as applicable)

Housing Support Services

Describe how your project aligns with these priorities.

The project expands fair housing choice in accessing and retaining stable housing, assisting both tenants and distressed homeowners. Programs and services include fair housing counseling, legal support and representation, and information and referral

Select HUD National Objective to be achieve with funding. Check all that apply.

Activities benefiting low and moderate-income persons. (LMI)

Activities benefiting low and moderate area. (LMA)

All projects funded are required to Affirmatively Further Fair Housing (AFFH) which is defined as taking "meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics."

How will this project Affirmatively Further Fair Housing?

FHANC affirmatively furthers fair housing (AFFH) by implementing an AFFH plan that identifies/addresses the impediments to fair housing choice in Marin County. FHANC will affirmatively further fair housing by operating a fair housing center experienced in fair housing counseling, investigation/enforcement activities, and fair housing education/outreach. Virtually all clients are members of protected classes, as that is an eligibility requirement to receive fair housing counseling services. 27

All projects funded are required to conduct Affirmative Marketing. For more information about affirmative marketing, visit the [Marin County Federal Grants website](#) and scroll down to the Affirmative Marketing panel.

Refer to the [Current Marin County Income Limits](#) to determine income level for use in the table below.

Approximately how many moderate, low, very low and extremely low-income persons will directly benefit from the program/project? Projects that support low-income persons will be prioritized.

	Number
Moderate Income	27
Low Income	34
Very Low Income	47
Extremely Low Income	242
TOTAL	350

How does your organization verify client income? Income verification is required except if the client is presumed benefit by HUD. Presumed benefit applies to abused children, battered spouses, the elderly, adult persons with serious disabilities, the homeless, illiterate persons, and migrant farm workers.

Income verification is required except if the client is "presumed benefit" defined by HUD as abused children, battered spouses, the elderly, adult persons with serious disabilities, the homeless, illiterate persons, and migrant farm workers.

Income verification is required unless the client is presumed a benefit by HUD; this applies to abused children, battered spouses, the elderly, adult persons with serious disabilities, the homeless, illiterate persons, and migrant farm workers. *

Methods of verification are self-reporting, third-party, or recipient of a benefit program. We follow Legal Services Corporation regulations which provide that LSC recipients must make a "reasonable inquiry" into applicant income "in a manner which does not impair the attorney-client relationship." Complying with such regulations addresses concerns about compliance with CDBG guidelines.

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Estimate the demographics of moderate, low, very low, and extremely low-income persons who will directly benefit from the program/project. The total number of beneficiaries should equal the total in the previous questions.

	Total Number of Persons	Number Identifying as Hispanic
American Indian or Alaskan Native	3	0
Asian	9	0
Black or African American	44	7
Native Hawaiian or Other Pacific Islander	14	0
White	197	21
American Indian and White	2	2
Asian and White	10	0
Black and White	1	0
American Indian and Black	0	0

	Total Number of Persons	Number Identifying as Hispanic
Multi-Racial	70	43
TOTAL	350	73

Total Number of Persons (Must equal total identified under income level)

350

Total Number Identifying as Hispanic

73

Female-Headed Households (out of above total)

165

Persons with Disabilities (out of above total)

203

PROJECT MANAGEMENT & FINANCIAL DATA

If your project or organization was funded previously, list past project(s), goals, and accomplishments/activities.

In FY2023-24, FHANC counseled 208 tenants/homeowners (370 individuals) in Marin, screened for fair housing issues, and provided referrals for non-fair housing clients. Of those counseled, 45 alleged discrimination or required assistance with a reasonable accommodation request and were referred to a housing counselor for assistance. Staff helped with 33 on behalf of disabled tenants. In 2023 FHANC and Marin City clients settled a landmark race discrimination appraisal lawsuit filed in 2021.

If your agency has remaining funds previously approved, please describe the timeline for expending the fund balance.

FHANC received the following grant awards for FY 2024 – 25:

Marin County CDBG – \$64,710 / \$34,502 remaining; all funds will be spent by 6/30/25

Marin County REAP – \$50,000 / \$50,000 remaining; funds will be spent down by 8/30/25

Marin County Nonprofit Community Partnership Program - \$10,000 / \$0 remaining

Marin County Dispute Resolution Funds - \$10,858 / \$0 remaining

Describe your organization's experience with administering grants and specifically federal grants.

FHANC has administered federal grant programs through the Fair Housing Initiatives Program since the 1990's and HUD's Comprehensive Housing Counseling Program since 2009, and Marin County and other jurisdictional CDBG and local funds (Sonoma County and the cities of Santa Rosa, Fairfield, and Vallejo) for many years. We are familiar with HUD requirements on all aspects of grant administration- personnel matters, billing, financial record-keeping, and reporting.

Describe who will supervise and manage the project and their past experience with project management.

Executive Director Caroline Peattie has 38 years of fair housing / project management experience and provides overall grant supervision. Supervising Attorney Julia Howard-Gibbon has 16 years of fair housing / 6 project management experience administering CDBG and HUD grants and supervising the housing counseling team. Education Director, Adriana Ames, has 31 years of fair housing and project management experience, has managed CDBG and HUD grants, and supervises education/outreach activities.

Describe any recent or upcoming leadership transitions.

There have not been any permanent changes in leadership. Audrey Perrott served as Acting Executive Director from 8/24 – 10/24 while Executive Director Peattie was on sabbatical.

Describe any flexibility regarding your projects start/completion date.

FHANC’s services are ongoing. There is some flexibility in project start and completion date, but it is subject to negotiation.

Required Attachments:


Attach Project Budget: Complete the project budget template provided and submit along with application. If you have a project budget that provides the information requested in the template, you may submit that in-lieu of the template. Please note: the project budget should reflect the total cost of the project NOT just the CDBG request.

 Marin County CDBG FY25-26 project-... .xlsx

Attach Organization Budget: : Upload your organization or fiscal sponsors annual budget.

 FHANC Annual Agency Budget Summ... .pdf

Attach Dynamic Flood Map

 FHANC-FEMA Flood Map-FIRMETTE_... .pdf

Attach Optional Miscellaneous Documents

 https_www.fairhousingnorcal.org_upl... .pdf

Submission

Please review your responses above for accuracy.

Name and Title of person completing this application.

Audrey Perrott, Development Director

By checking this box

I hereby certify that the information in this application is true and accurate to the best of my knowledge.

Project Budget Template

Organization Name: Fair Housing Advocates of Northern California
 Project Title: Fair Housing Counseling and Education

Date: 2/13/2025

INCOME:	County NOFA Request	Other Funding Sources	In Kind
Committed			
Government:			
HUD/Fair Housing Initiatives Program - Enforcement		\$ 141,666.67	
Marin Country - REAP		\$ 25,000.00	
Corporations:			
Individual Contributions:			
(list total):			
Earned Income:			
Other (specify):			
Subtotal, Committed Income		\$ 166,666.67	\$ -
Uncommitted			
Other (specify):			
Federal Grants Request	\$ 85,000.00		
Other Foundations:			
Marin Community Foundation		\$ 200,000.00	
<i>(Add rows to list other Foundations)</i>			
Government:			
HUD/Fair Housing Initiatives Program - Education		\$ 41,666.67	
HUD/Fair Housing Initiative Program - Fair Housing Organization Initiative: Enforcement and Systemic Testing Project		\$ 58,464.68	
Corporations:			
Individual Contributions:			
Subtotal, Uncommitted Income		\$ 300,131.35	\$ -
Other			
Earned Income:			
Subtotal, Earned Income			
Grand Total Income	\$ 85,000.00	\$ 466,798.02	\$ -

EXPENSES (Add rows to list other expenses)	County NOFA Request	Other Funding Sources	In Kind
Personnel Expenses			
Executive Director (% FTE: 0.05) CP	\$ 7,263.00	\$ 40,037.61	
Education Director (% FTE: 0.07) AA	8,179.00	45,146.24	
Supervising Attorney (% FTE: 0.08) JHG	9,121.00	50,418.39	
Housing and Policy Attorney (% FTE: 0.04) SW	3,294.00	18,209.68	
Director of Investigations and Staff Attorney (% FTE: 0.07) MC	5,718.00	31,605.29	
Housing Counselor/ Investigations Coordinator (% FTE: 0.08) SVS	5,790.00	32,007.76	
Housing Counselor (% FTE: 0.06) KR	3,883.00	21,462.91	
Bilingual Housing Counselor (% FTE: 0.03) MRG	1,912.00	10,570.11	
Bilingual Housing and Intake Counselor (% FTE: 0.03) BC	1,909.00	10,551.81	
Bookkeeper/Accountant (% FTE: 0.03) JB	3,405.00	18,810.32	
Data Administrator (% FTE: 0.00) NT		9,092.74	
Education Assistant (% FTE: 0.00) EL		13,589.39	
Executive Assistant (% FTE: 0.00) IB		10,610.56	
Benefits (@ 31.29%)	\$ 15,793.00	\$ 76,562.29	
Subtotal Salaries and Benefits	\$ 66,267.00	\$ 388,675.11	\$ -
Contracted Services			
Professional Fees (I.T. Support)	\$ 874.00	\$ 4,800.08	
<i>(Add rows to list other contracted expenses)</i>			
Subtotal Contracted Services	\$ 874.00	\$ 4,800.08	0
Direct Project Related Expenses			
Occupancy (Rent)	\$ 1,448.00	\$ 7,953.75	
Telephone / Internet	231.00	1,268.00	
Computer Software Services	579.00	3,178.75	
Consumable Office Supplies	42.00	232.50	
Marketing / Advertising		2,113.92	
Travel		4,484.75	
Other Direct Costs		8,262.17	
Subtotal, Direct Project Related Expenses	\$ 2,300.00	\$ 27,493.83	0
General Development			
<i>(Add rows to list other specific project expenses)</i>			
Subtotal, Direct Project Related Expenses	0	-	0
Indirect Expense - specify % in column A below (must be HUD approved)			
23.48%	\$ 15,559.00	\$ 45,829.00	
Fiscal Sponsorship Fee (specify % in column A below)			
Grand Total All Expenses	\$ 85,000.00	\$ 466,798.02	\$ -

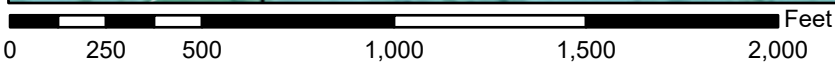
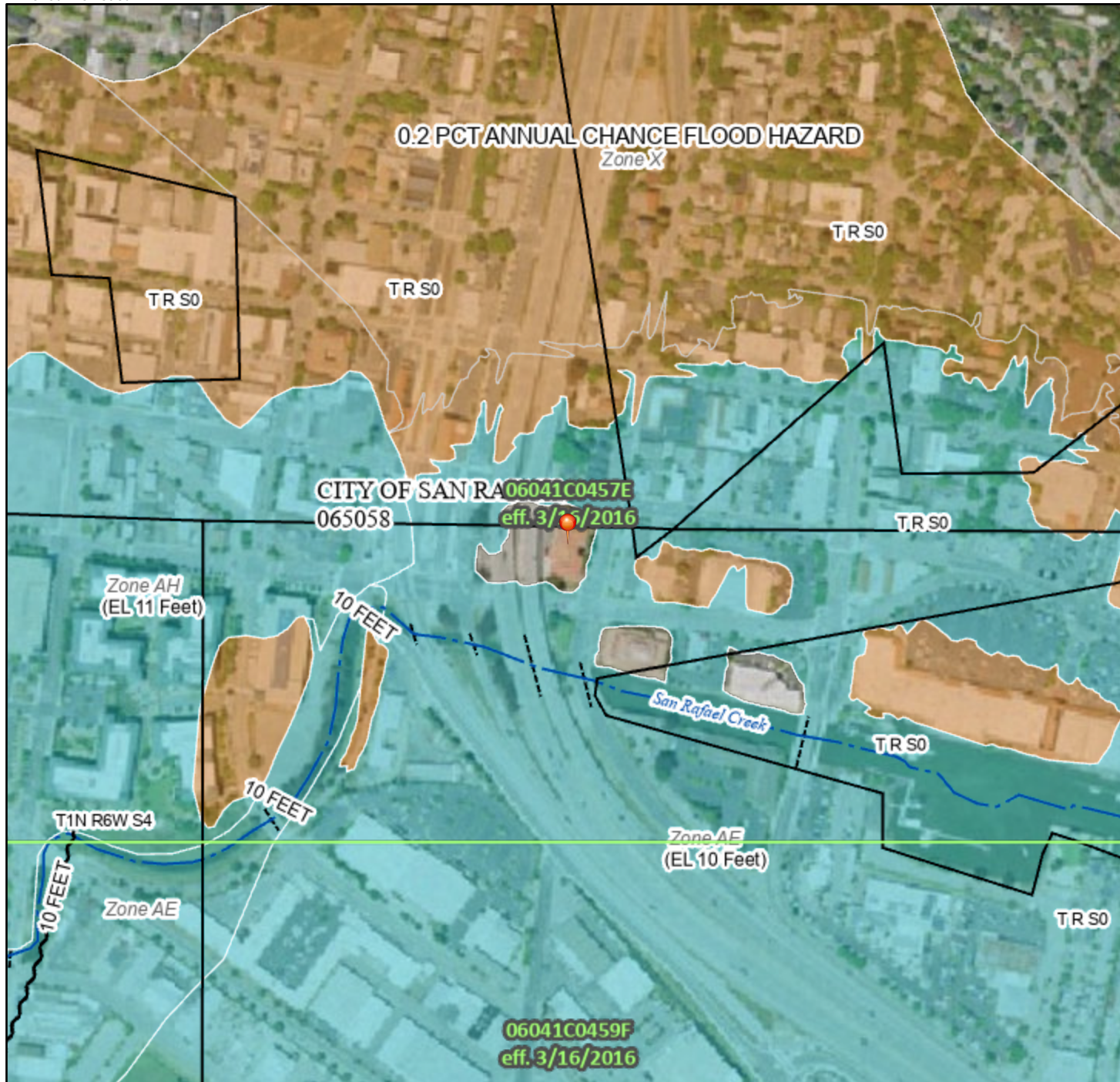
Fair Housing Advocates of Northern Cal Financial Forecast

	FY23 FORECAST
	<u>6/30/2023</u>
REVENUE	
Government Grants	863,381
Corporate/Foundation Grants	95,000
Special Events	21,000
Contributions	13,000
Other income	2,010
New Government Grants	744,939
Fannie Mae Settlement	310,000
	<u>0</u>
Total Revenue	\$ 2,049,330
EXPENDITURES	
Salaries & Wages	1,152,921
Payroll Taxes	93,062
Benefit Expenses	136,732
Professional Services	26,950
Office Expenses	57,140
Staff Development	22,925
Professional Labor	6,000
Insurance Expenses	6,000
Occupancy Expenses	54,148
Charitable Contributions	250
Bank Service Charge	250
Other Expenses	<u>0</u>
Total Expenditures	\$ 1,556,378
Net Operating Revenue	\$ 492,952
Cumulate Surplus/(Deficit)	\$ 1,100,421

National Flood Hazard Layer FIRMette



122°31'36"W 37°58'30"N



1:6,000

122°30'58"W 37°58'1"N

Basemap Imagery Source: USGS National Map 2023

Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

- | | | |
|------------------------------------|----------------------|--|
| SPECIAL FLOOD HAZARD AREAS | | Without Base Flood Elevation (BFE)
<i>Zone A, V, A99</i> |
| | | With BFE or Depth <i>Zone AE, AO, AH, VE, AR</i> |
| | | Regulatory Floodway |
| OTHER AREAS OF FLOOD HAZARD | | 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile <i>Zone X</i> |
| | | Future Conditions 1% Annual Chance Flood Hazard <i>Zone X</i> |
| | | Area with Reduced Flood Risk due to Levee. See Notes. <i>Zone X</i> |
| | | Area with Flood Risk due to Levee <i>Zone D</i> |
| OTHER AREAS | | NO SCREEN Area of Minimal Flood Hazard <i>Zone X</i> |
| | | Effective LOMRs |
| GENERAL STRUCTURES | | Area of Undetermined Flood Hazard <i>Zone D</i> |
| | | Channel, Culvert, or Storm Sewer |
| OTHER FEATURES | | Levee, Dike, or Floodwall |
| | | 20.2 Cross Sections with 1% Annual Chance |
| MAP PANELS | | 17.5 Water Surface Elevation |
| | | Coastal Transect |
| | | Base Flood Elevation Line (BFE) |
| | | Limit of Study |
| | | Jurisdiction Boundary |
| | | Coastal Transect Baseline |
| | | Profile Baseline |
| | Hydrographic Feature | |
| MAP PANELS | | Digital Data Available |
| | | No Digital Data Available |
| | | Unmapped |



The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on **2/4/2025 at 5:35 PM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

2023-2024 AUDIT REPORT



AN INVESTIGATION OF RACE DISCRIMINATION IN RENTAL HOUSING AND THE USE OF CRIMINAL RECORDS IN TENANT SCREENING

IN MARIN, SONOMA, & SOLANO COUNTIES



**FAIR HOUSING ADVOCATES
OF NORTHERN CALIFORNIA**

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FOREWORD

For more than 150 years, since the passage of the Civil Rights Act of 1866, Black Americans have had the right to enter into lease agreements and purchase and hold property in the United States.ⁱ In 1923, the Supreme Court recognized the right to "establish a home" as one of the fundamental liberties protected by the U.S. Constitution.ⁱⁱ And in 1968, Congress passed the Fair Housing Act to prohibit discrimination in housing on the basis of race, color, national origin, and other protected classes.ⁱⁱⁱ However, despite legislative progress, housing discrimination is still a reality for many Black individuals, particularly where the intersection of race and criminal conviction histories creates significant barriers to securing stable housing.

Decades of "tough on crime" policies, including the War on Drugs, have resulted in a significant increase in the prison population and nearly one-third of the U.S. population has a criminal record.^{iv} With 95% of current inmates eventually returning to society, access to safe, secure, and affordable housing is crucial for their successful reentry.^v However, many formerly incarcerated individuals, as well as those with convictions who were not incarcerated, face significant barriers to securing housing. People with criminal records are routinely denied when applying to rent housing, particularly given the explosive increase in algorithmic tenant screening products now commonly used by housing providers, most of which screen for criminal conviction histories.^{vi}

The burden of criminal legal system involvement disproportionately impacts Black people.^{vii} Due to the over policing of communities of color, Black individuals are stopped by police, arrested, prosecuted, convicted, and incarcerated at rates disproportionate to their share of the general population.^{viii} Black people represent about 13% of the total U.S. population but account for roughly 27% of all arrests.^{ix} Black men are six times more likely to be incarcerated than white men.^x In 2021, California law enforcement was more than twice as likely to use force against Black people during vehicle and pedestrian stops compared to white people;^{xi} and the share of Black people seriously injured or killed during police encounters is about three times their share of the state population.^{xii} Black Californians make up 19.5% of felony defendants but only 5.7% percent of the total state population.^{xiii} As a result, a disproportionate number of Black people are affected by criminal background checks when applying for housing. And because people with criminal records face significant barriers to finding housing, they disproportionately end up homeless. Lack of housing leads to limited economic opportunity, thereby increasing the chance of recidivism, and the cycle continues.^{xiv}

HUD has issued guidance for landlords in an attempt to minimize these disparities and avoid fair housing violations; however, it is unclear to what extent landlords actually comply with these guidelines. As such, FHANC conducted 120 investigations at 30 rental properties in Marin, Sonoma, and Solano Counties and by analyzing the experiences of Black and white testers posing as prospective renters, this investigation sought to shed light on whether tenants with criminal conviction histories are being discriminated against on the basis of race and/or disproportionately excluded from housing because of their criminal records.

EXECUTIVE SUMMARY

This report details the results and subsequent recommendations following FHANC's investigation of discrimination against Black home seekers with criminal conviction records. Between November 2023 through February 2024, FHANC conducted 120 tests of 30 landlords in Marin, Sonoma and Solano Counties. While federal and state fair housing laws have prohibited housing discrimination on the basis of race for decades, the results of this audit show that Black individuals with criminal legal system involvement continue to experience discrimination and overly broad criminal history screening policies as barriers to housing choice.

FHANC's investigation revealed the following key findings:

- **Differential Treatment Based on Race:** 47% of investigations revealed evidence of differential treatment, where Black testers were treated less favorably or received less information, follow-up, or encouragement compared to white testers. For example, at one property, a white tester was told that a felony conviction would be overlooked if she applied with a co-signer while a Black tester with the exact same record was told the conviction would result in an automatic denial and was advised not to apply.
- **Use of Criminal Background Screening Policies:** 83% of the properties investigated screen for criminal records, despite HUD recommendations discouraging this practice because criminal history is not a reliable predictor of tenant success.
- **Disparate Impact:** None of the landlords investigated that screen for criminal records follow all of HUD's guidelines on how to avoid fair housing violations, and the vast majority fail to conduct individualized assessments or consider mitigating factors like the recency or severity of the alleged conduct. All housing providers that screen for criminal records use third-party tenant screening services, which utilize algorithms that may contain racial or other prohibited bias in their design and/or have not been shown to reliably predict risk. This investigation found that most of the landlords that use third-party screeners rely on them to make eligibility decisions and testers were told there is no opportunity to appeal a denial or provide mitigating information.
- **Deterrent Effect of Vague Policies:** While most criminal record screening policies would likely deter anyone with a more serious record from applying, 18 of the 25 policies described to testers were so vague that even people with less serious records, like someone with a very old conviction or a recent misdemeanor, would likely be deterred from applying because the only way to know whether the conviction would in approval or denial is to pay a non-refundable application fee (all of which are \$20 to \$60 per adult household member).

- **Widespread Implications:** In Marin, Sonoma, and Solano counties there are approximately 697 large multi-family rental properties (buildings with 30 or more units), with a total of 110,839 rental apartments. If 83% have criminal record screening policies that violate fair housing laws (as the results of this investigation suggest), there are more than 92,000 units in the tri-county area that exclude home seekers based on their criminal history in a discriminatory manner.
- **Similar Rates of Discrimination in Each County:** While housing providers in Solano County were revealed to be the most discriminatory, with 50% treating Black testers less favorably than white testers and 90% having criminal background screening policies that disproportionately exclude Black applicants, the rate of discrimination was similarly and alarmingly high in all three counties.

Based on these results, FHANC has proposed a number of recommendations for the housing industry and community at large to help increase housing opportunity for people with criminal legal system involvement, particularly Black tenants in Marin, Sonoma, and Solano Counties. Recommendations include funding future audits and fair housing education and passing local ordinances to prohibit landlords from considering criminal histories in tenant screening.

Those responsible for this report hope the results and recommendations contained herein will heighten awareness and encourage a cooperative effort by all segments of our communities to eliminate discrimination based on race, to increase opportunities for people with criminal legal system involvement, and to educate housing providers on their obligation to comply with fair housing laws.

ACKNOWLEDGMENTS

FHANC would like to express sincere gratitude to the testers who participated in this investigation, acknowledging that their dedication was essential to conducting the testing and producing this report.

This audit was carried out by FHANC's Investigations Coordinators, Ursula Lindsey, Maria Callahan, and Quinn McFeeters, under the supervision of Supervising Attorney, Julia Howard-Gibbon, and Executive Director, Caroline Peattie. Ms. Howard-Gibbon analyzed the investigations with the assistance of Ms. Callahan and prepared this audit report with the assistance of FHANC's Housing and Policy Attorney, Savannah Wheeler. Many thanks to all involved.

The work that provided the basis for this publication was supported by funding under a grant with the U.S. Department of Housing and Urban Development. The author and publisher are solely responsible for the accuracy of the statements and interpretations contained in this publication. Such interpretations do not necessarily reflect the views of the Federal Government.