

# City of Salem 2025 Analysis of Impediments to Fair Housing Choice

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# Introduction and Executive Summary

## Executive Summary

The City of Salem receives an annual allocation from the US Department of Housing and Urban Development’s (HUD) Community Development Block Grant (CDBG) program. In the program year 2024, the City’s CDBG entitlement grant was **\$1,438,707.00**. HOME allocation \$642,147. In the 2025 program year, which starts July 1, 2025, the allocations for CDBG funding are \$1,469,203, and the HOME allocation is \$672,526.40. The City of Salem, Oregon, is committed to ensuring that all residents have equal access to housing free from discrimination, segregation, and other barriers. This **2025 Analysis of Impediments to Fair Housing Choice (AI)** examines housing challenges within Salem and provides a strategic framework for compliance with **HUD’s Affirmatively Furthering Fair Housing (AFFH) mandate** under the Fair Housing Act. This report identifies local barriers to fair housing, evaluates regulatory compliance, and outlines actionable solutions to enhance **equitable housing access** across Salem. The AI is a **HUD-mandated assessment** required for cities receiving federal funding through the **Community Development Block Grant (CDBG) program**.

Title VIII of the Civil Rights Act of 1968, known as the **Fair Housing Act**, requires HUD and recipients of federal funds from HUD to affirmatively further the policies and purposes of the Fair Housing Act, also known as “affirmatively further fair housing” or “AFFH”. The obligation to affirmatively further fair housing requires recipients of HUD funds to take meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics, which are:

- Race
- Color
- National Origin
- Religion
- Sex
- Familial Status
- Disability

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## Fair Housing in Oregon

Oregon's fair housing laws are enforced by the **Oregon Bureau of Labor and Industries (BOLI)** in coordination with HUD’s **Fair Housing Assistance Program (FHAP)**. In addition to federal protections, Oregon state law (ORS 659A) expands housing protections to include:

- **Sexual orientation and gender identity**

- **Source of income discrimination (e.g., Housing Choice Vouchers)**
- **Marital status**

#### **City of Salem Additional Protected Classes**

- **Age**
- **Occupation**
- **Domestic Partnership**
- **Housing Status**
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The Fair Housing Council of Oregon oversees state housing policies, ensuring compliance with the **Housing Accountability Act (HAA)** and other anti-discrimination measures. The **Oregon Land Use Planning Act (ORS 197.303)** also supports fair housing by requiring cities like Salem to zone for diverse housing types, including **affordable, multifamily, and supportive housing**.

Generally, in administering programs and activities relating to housing and community development, the federal government, HUD, and its recipients must:

- Determine who lacks access to opportunity and address any inequity among protected class groups
- Promote integration and reduce segregation
- Transform racially and ethnically concentrated areas of poverty into areas of opportunity

The CDBG program contains a regulatory requirement to affirmatively further fair housing based upon HUD's obligation under Section 808 of the Fair Housing Act.

HUD defines impediments to fair choice as:

1. Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability
2. Any actions, omissions, or decisions which have the effect of restricting housing choices, or the availability of housing choices based on race, color, religion, sex, disability, familial status or national origin.

The CDBG regulation also reflects the CDBG statutory requirement that grantees certify that they will affirmatively further fair housing. HUD's goal is to expand mobility and widen a person's freedom of choice. As a result, the City of Salem is required to:

1. Conduct an analysis to identify impediments to fair housing choice within the jurisdiction;
2. Take appropriate actions to overcome the effects of any impediments identified through the analysis;
3. Maintain records reflecting the analysis and activities taken in this regard.

Salem is dedicated to implementing these objectives and will:

- Analyze and work to eliminate housing discrimination in the jurisdiction;
- Form policy to better support fair and equitable housing;
- Promote fair housing for all persons;
- Provide opportunities for inclusive patterns of housing occupancy regardless of race, color, religion, sex, familial status, disability, and national origin;
- Promote housing that is structurally accessible to and usable by all persons, particularly persons with disabilities; and
- Foster compliance with nondiscrimination provision of Fair Housing Act.

Although the City’s obligation arises in connection with the receipt of Federal funding, its **fair housing obligation is not restricted to the design and operation of HUD-funded programs at the local level**. The fair housing obligation extends to all housing and housing-related activities in the City of Salem’s jurisdictional area, whether publicly or privately funded.

This **report provides the City of Salem with a roadmap** to enable the City to address and remedy any challenges that residents may experience that impact their access to fair and affordable housing. The city’s goal in conducting the Assessment of Impediments to Fair Housing Choice (AI) is to identify and provide solutions to barriers and impediments to fair housing and to **provide a structure for ongoing dialogue, relationships, and greater housing choice throughout the community**. Open communication and strong relationships are necessary to ensure a continuous exchange of ideas, concerns, analysis, and evaluation.

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## Who Conducted

**Resource Consultants** assisted the City of Salem staff with preparing this *Analysis of Impediments to Fair Housing Choice (AI)*.

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## Methodology

HUD’s “Fair Housing and Planning Guide, Volume 1” was used to direct the AI. The AI is undertaken to determine what types of impediments to fair housing choice may exist within Salem. The AI provides detailed information for policymakers, administrative staff, housing providers, housing advocates, and civil rights organizations. The AI includes background information, statistical data, and a review of laws, policies, and complaints. It details



community perception, identifies available resources, and lists specific impediments to fair housing choice. Also, the AI provides recommendations to address the impediments identified during the AI process.

The purpose of this AI is to:

- Review of the City’s laws, regulations, administrative policies, procedures, and practices concerning fair housing;
- Access how laws, regulations, policies, and procedures affect the location, availability, and accessibility of housing; and
- Access public sector conditions affecting fair housing choice.

The AI identifies patterns and trends at a local scale. It evaluates fair housing issues in Salem’s jurisdiction on the following topics.

- Fair housing enforcement and outreach capacity
- Integration and segregation patterns and trends
- Racially and Ethnically Concentrated Areas of Poverty (R/ECAP)
- Disparities in access to opportunity
- Disproportionate housing needs
- Local area knowledge and Stakeholder Community Input
- Analysis of housing sites inventory using AFFH indicators
- Other relevant factors

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## **Data Sources and Technical Appendix**

The data presented in this Analysis of Impediments (AI) to Fair Housing Choice relies on multiple public and subscription-based sources. All data were reviewed for consistency with HUD guidelines and the Fair Housing Planning Guide, Volume 1.

## **Sources and Data References**

### **Federal Data Sources**

- U.S. Census Bureau
- American Community Survey (ACS) 5-Year Estimates (2013–2023)
- U.S. Decennial Census Data
- U.S. Department of Housing and Urban Development (HUD)
- Comprehensive Housing Affordability Strategy (CHAS) Data (2015–2021 releases)
- HUD AFFH Data and Mapping Tool
- HUD User Portal and eGIS Resources

- HUD Definitions of Fair Housing Terms, R/ECAP Areas, and Cost Burden Thresholds
- HUD Point-in-Time Count (PIT), 2023
- OR-504: Salem/Marion-Polk Counties Continuum of Care

### **State and Local Data**

- ECONorthwest. *Salem Housing Needs Analysis (2015–2035)*
- Oregon Employment Department
- Mid-Valley Employment Forecast 2021–2031
- Regional Wage and Labor Market Trend

### **City of Salem**

- ECONorthwest. *Salem Housing Needs Analysis (2015–2035)*
- Consolidated Plan and Annual Action Plans
- CDBG Program Records
- GIS and Zoning Maps
- Salem Housing Authority Reports
- Willamette Valley Council of Governments (WVCOG)
- Natural Hazards Mitigation Plan (2022–2023)
- Oregon Housing and Community Services (OHCS)
- Affordable Housing Inventory
- Statewide Housing Plan

### **Surveys and Community Input**

- Salem Housing Needs Survey (2023)
- Public Forums and Stakeholder Interviews (FHCO, Legal Aid, MWVCAA, etc.)
- Salem Housing Production Strategy Survey (HPS), 2025
- Fair Housing Training and Outreach Events Log (2020–2025)

### **Other Sources**

- Point2Homes / Neilsberg Research
- Affordable Housing Listings and Property Data (RHF, AffordableHousing.com)
- Public Health and Demographic Reports (Willamette Health Council, OHA)

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## **Funding**

The City received funding through the HUD Community Development Block Grant (CDBG) program and utilized CDBG administrative funds to pay staff costs and support the development of the Analysis of Impediments to Fair Housing Choice (AI). The City of Salem utilized administrative funds for the consultants to assist with the Consolidated Plan and AI. City Staff time is funded through the CDBG and HOME administrative funds.

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## Summary of Analysis Findings

As a recipient of HUD CDBG Entitlement funds, the City is committed to affirmatively furthering fair housing choices for all residents. Although many issues that affect fair housing choice have been identified, the City is limited in resources and ability to impact all areas. The City of Salem recognizes the following impediments which may have a direct and substantial impact on fair housing choice and are within the City's ability to impact. Furthermore, the City has identified action steps to address the areas of impediments. While, not listed as an impediment, the City is encouraged to integrate best practices for fair housing and visibility into the General Plan update. Evaluating the updated Comprehensive Plan through the lens of fair housing will have a lasting impact as the City continues to evolve and meet the needs of residents.

Through data analysis, community feedback, and public engagement, the City of Salem has identified the following as key **challenges to fair housing choice**:

1. **Limited Affordable Housing Supply**
  - **Shortage of rental units** for low- and moderate-income households.
  - **Rising housing costs** exceeding local wage growth.
2. **Discrimination in Rental Housing**
  - **Disparate treatment** of tenants using Housing Choice Vouchers.
  - **Unlawful screening criteria** that disproportionately impact protected groups.
3. **Barriers for People with Disabilities**
  - Lack of **accessible housing options**.
  - Limited enforcement of **reasonable accommodation policies**.
4. **Zoning and Land Use Restrictions**
  - Continue to examine policies that may **limit multifamily housing** in high-opportunity areas.
  - **Explore additional opportunities to prioritize approval of affordable housing projects to minimize permitting delays.** .
5. **Language and Outreach Barriers**
  - Limited **Spanish-language resources** for renters and homebuyers.
  - Insufficient **public awareness** about fair housing rights.

<b>Impediment</b>	<b>Goal</b>	<b>Recommended Action Steps</b>
Discrimination Against People with Disabilities	Expand housing access and protections for persons with physical and mental disabilities.	<ul style="list-style-type: none"> <li>• Increase landlord education on reasonable accommodations and modifications.</li> <li>• Fund and expand fair housing testing focused on disability.</li> <li>• Partner with disability rights organizations to identify accessible housing needs.</li> <li>• Increase design standards to include accessibility design in new subsidized housing.</li> </ul>
Lack of Affordable Housing and High-Cost Burden Among Renters	Increase the supply of affordable and income-restricted rental housing.	<ul style="list-style-type: none"> <li>• Incentivize development of affordable units through inclusionary zoning and SDC deferrals.</li> <li>• Preserve naturally occurring affordable housing (NOAH).</li> <li>• Expand housing choice voucher acceptance through landlord training.</li> <li>• Prioritize rental housing in areas near jobs, transit, and services.</li> </ul>
Discrimination Based on National Origin and Familial Status	Reduce discrimination against immigrant, multi-generational, and	<ul style="list-style-type: none"> <li>• Develop and implement a HUD-compliant Language Access Plan (LAP).</li> <li>• Provide translated fair</li> </ul>

	linguistically diverse households.	housing materials and outreach campaigns in Spanish and other languages. <ul style="list-style-type: none"> <li>• Conduct fair housing testing focused on familial status and national origin.</li> <li>• Strengthen enforcement of local fair housing ordinances and educate landlords on tenant rights.</li> </ul>
<b>Impediment</b>	<b>Goal</b>	<b>Recommended Action Steps</b>
Insufficient Supply of Appropriately Sized Units for Smaller Households	Align unit sizes with demographic trends to improve access for smaller households.	<ul style="list-style-type: none"> <li>• Encourage development of studios and one-bedroom units, particularly near transit and in mixed-use zones.</li> <li>• Continue to use zoning reform and incentives to promote accessible ADUs and cottage clusters.</li> <li>• Offer density bonuses for developments that include smaller units.</li> <li>• Monitor unit mix in new construction to ensure proportional development of smaller units.</li> </ul>
Lack of Robust Local Fair Housing Enforcement and Testing	Improve fair housing enforcement and outreach capacity.	<ul style="list-style-type: none"> <li>• Seek funding for local, sustained fair housing testing in partnership with FHCO.</li> <li>• Host annual fair housing trainings for property managers and tenant advocates.</li> <li>• Create a centralized online reporting tool and publicize complaint procedures.</li> <li>• Develop and distribute a multilingual “Know Your Rights” toolkit.</li> </ul>

Limited Language Access for LEP Individuals	Ensure consistent, equitable access to Fair Housing services and HUD-funded programs for LEP individuals.	<ul style="list-style-type: none"> <li>• Create a HUD Approved Language Access Plan (LAP)</li> <li>• Translate vital HUD documents and web content into Spanish.</li> <li>• Continue to certify employees providing interpretation services and ensure all city departments are aware translation services are available.</li> <li>• Partner with community groups for bilingual outreach.</li> <li>• Increase visibility of language assistance on City platforms.</li> </ul>
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## Impediments to Fair Housing Choice in Salem, Oregon

### 1. Discrimination Against People with Disabilities

- Disability-related complaints made up nearly 70% (129 of 185) of all fair housing allegations filed in Salem over the last five years. Information from the recently completed Housing Production Strategy survey.
- Barriers include refusal to make reasonable accommodations or modifications, and failure to understand or comply with fair housing requirements.
- Limited accessible housing stock, especially among older units, compounds the problem.

### 2. Lack of Affordable Housing and High-Cost Burden Among Renters

- Over 54% of Salem renters are cost-burdened, meaning they spend more than 30% of their income on rent.
- Rent has increased by 69.4% since 2013, significantly outpacing income growth of 56.4%.
- This burden disproportionately affects low-income households, households of color, seniors, and voucher holders—many of whom are members of the most marginalized protected classes.

### 3. National Origin and Familial Status Discrimination

- Fair housing complaints and anecdotal evidence point to increasing discrimination against multi-generational and immigrant households.
- Familial status complaints (14) and national origin complaints (16) have been documented, and stakeholders report that landlords sometimes object to larger households or non-nuclear family living arrangements.
- Language access remains a barrier for Spanish-speaking residents and those with limited English proficiency.

#### **4. Insufficient Supply of Appropriately Sized Units for Smaller Households**

- 62.4% of Salem households consist of one or two people, but only 26.5% of rental units are studio or one-bedroom.
- This mismatch forces small households into larger, more expensive units or shared housing, which can lead to crowding or displacement—especially for low-income and elderly individuals.

#### **5. Lack of Robust Local Fair Housing Enforcement and Testing**

- Only eight fair housing tests were conducted in Salem between 2020 and 2023, and funding for local testing has been cut.
- Many complaints were not fully investigated due to lack of contact or resources (66 of 95 cases closed without resolution).
- While FHCO and legal partners are active, capacity and community awareness of fair housing rights appear limited.

#### **6. Create a HUD-approved Language Access Plan (LAP)**

- Many Salem residents have limited English proficiency (LEP), especially among the city's Hispanic/Latino population. Language barriers limit access to fair housing information, HUD-funded programs, and complaint procedures.
- Spanish is the most commonly needed language, but materials and services are not consistently available. This impedes equal access to housing services and protections and may contribute to underreporting discrimination by LEP individuals.

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## **Summary of Citizen Participation Process**

### **Overview**

The City of Salem employed a diverse range of public outreach methods to solicit input from stakeholders and community members, including interviews, surveys, community events, and public meetings. The City of Salem collaborated with Resource Consultants to compile a list of local stakeholders and organizations that provide affordable housing, market-rate housing, homeless services, and other non-profit services, economic development services, and other community services in Salem. These stakeholders were consulted in the process of drafting the AI.

The outreach process also included a Survey of Housing Needs developed by the Housing Production Strategy Committee and the City of Salem Planning Department. A public hearing will be held in connection with the AI and the Consolidated Plan. The Housing Survey was distributed in printed and electronic versions. As of today, #536 responses have been received.

The Draft for Public Review AI was made available in late June, 2025, and a 30-day public input period was initiated. A public hearing will be held during the public review period in order to gather feedback and input on the draft Analysis of Impediment. After the close of the public review period and inspection of comments received, the Final Report will be made available to the public.

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### **Public Noticing**

Salem utilized the following notification methods during the HPS Survey to engage a diverse array of community members:

- Posts to the City’s Facebook and Instagram accounts and the City’s website announcing the Housing Needs Survey;
- Hard copies of the survey were placed in City Hall and the library.
- A press release notifying the community about the Survey;
- Emails to community organizations to request assistance with sharing the survey.
- For the development of AI, we targeted community members while tabling at community/outreach events and resource fairs

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### **City Council Presentation**

On May 20th, City Staff presented at the Planning Commission meeting, which was a public hearing. A City Council meeting is scheduled for July 14<sup>th</sup> that will be open to the public. City Staff and Resource Consultants will present an introduction to the Consolidated Plan and AI process.

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### **Community Workshops**



In coordination with the FHCO, we presented at multiple neighborhood association meeting. The agendas go out to email addresses and are posted on the city's neighborhood association website.

- Housing is needed at all income levels;
- Housing for low-income households in needed;
- It is difficult to find Section 8 housing, even with a voucher;
- Transportation is challenging. There are not a lot of units available near public transit;
- More low-income housing is needed in the City, including for populations with disabilities

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### **Stakeholder Interviews** *\*More information will be added as it continues to be collected*

A series of both in-person and virtual, via Zoom, stakeholder interviews were hosted throughout the AI process. During stakeholder interviews, housing issues specific to Salem were discussed. The following themes emerged throughout discussions as important:

- A need for more affordable housing in the city, particularly accessible affordable housing in the City, particularly accessible affordable housing for residents with disabilities, as well as housing for all income levels;
- Homeless services, Mental Health and Addiction services
- Participants stated there is not enough affordable housing near transit stops and facilities. Households using HCV's have difficulty finding available affordable housing and there are not enough opportunities for these households;
- Additionally, participants identified a need for strategic community engagement and outreach programs regarding housing, suggesting the City work with trusted local organizations to expand information about access to program information.
- Access for people with Language barriers are limited. There are Spanish translation services but there are not sufficient translation services for other languages.
- There is a need for "Right Sized" affordable housing units. Smaller (studio & 1 bedroom) and larger 5+ bedroom units are needed.

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### **Drafts**

A draft for public review AI was made available late June, 2025 and a 30-day public comment period was initiated. A public hearing will be held during the public review period in order to gather feedback and input on the draft AI. Following the close of the public comment period and an inspection of the comments received, the final report will be made available to the public.

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### **Housing Needs Survey**

## Summary

As part of the City of Salem's **Housing Production Strategy (HPS)** development process, a Housing Needs Survey was conducted to better understand the experiences, priorities, and challenges faced by residents in finding and maintaining housing. This community survey was designed to capture perspectives from a wide cross-section of the public, including renters, homeowners, seniors, families, people with disabilities, and individuals from historically underserved communities.

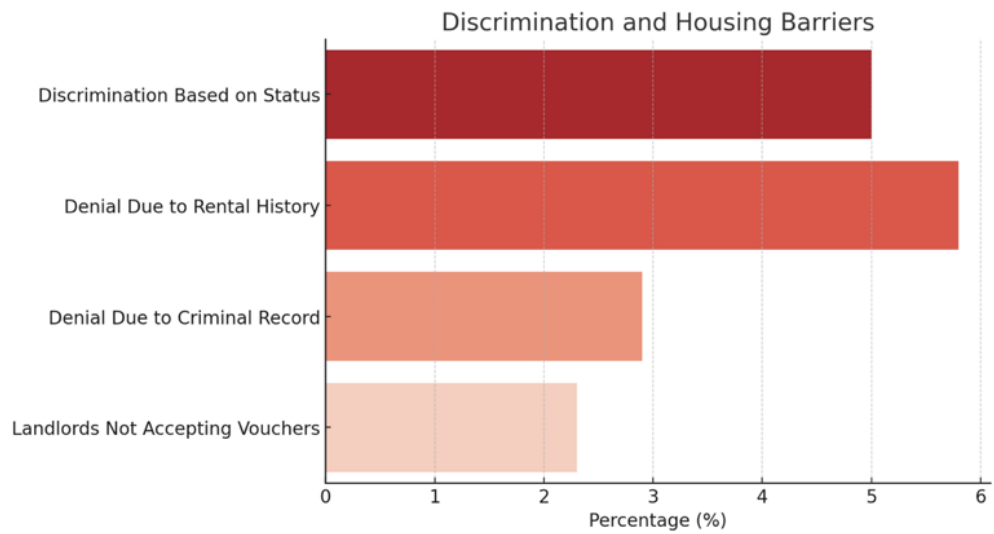
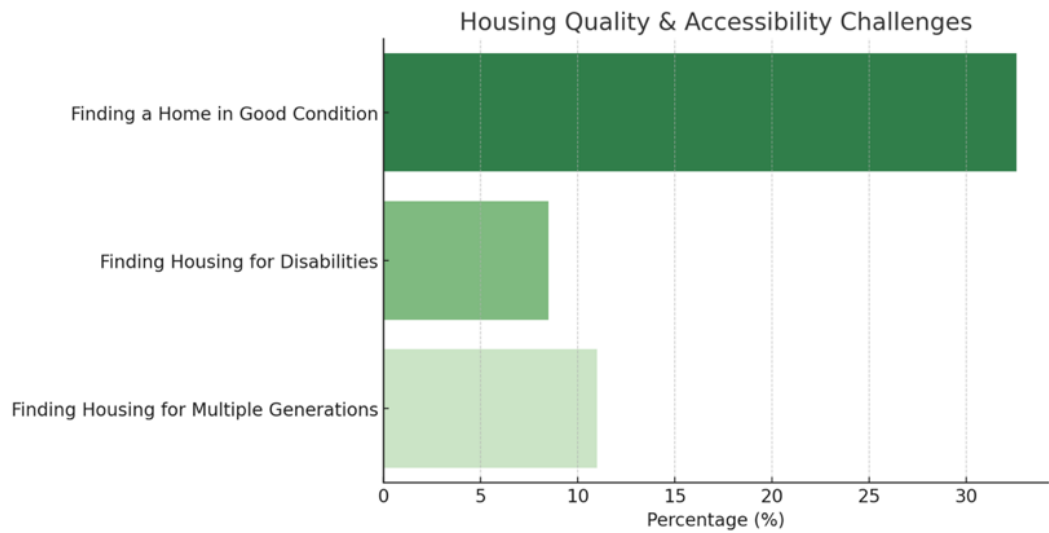
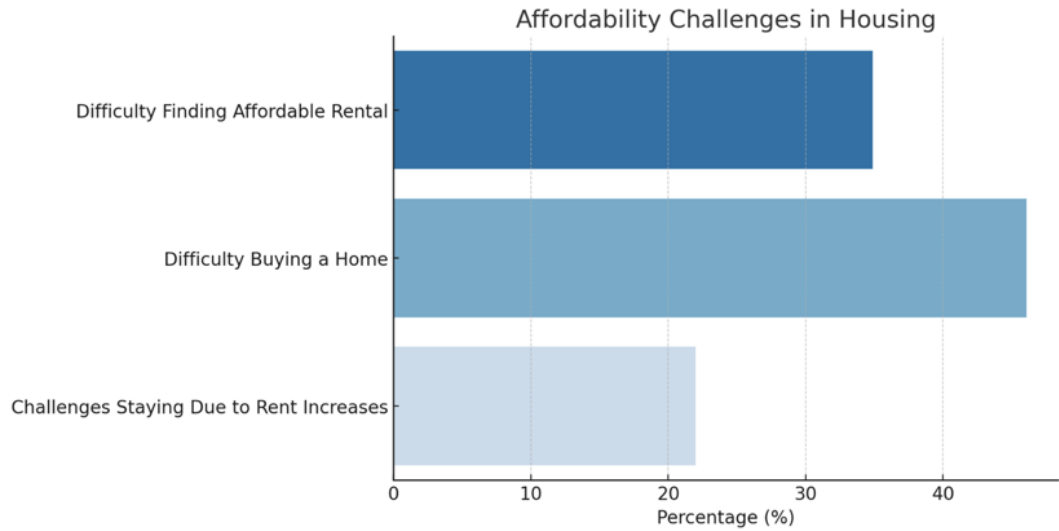
The **Housing Needs Survey** collected responses from 536 participants, providing valuable insights into affordability, accessibility, and housing stability in the community. The findings highlight the difficulties experienced by both renters and homeowners in securing and maintaining affordable, suitable housing. The survey, administered in the Fall of 2023, provided an opportunity for residents to voice their concerns about housing affordability, housing quality, availability of specific unit types, neighborhood conditions, and barriers to housing access. In total, hundreds of residents participated, offering valuable insight into how the housing market is impacting everyday lives in Salem.

Key findings from the survey were used to shape policy actions in the HPS, prioritize equity in housing strategies, and ensure that future housing production aligns with community needs. Survey results also supplement the City's technical housing needs analysis by grounding it in lived experience, particularly around cost burden, displacement risk, and unmet demand for affordable and accessible housing.

## Survey Content

The survey gathered the following information from survey respondents:

- Demographics
- Household Information: Household satisfaction
- Housing Barriers
- Housing Needs
- Unmet Housing Needs



## Key Challenges Identified

### 1. Affordability Concerns:

- The most significant issue was the **difficulty in finding an affordable home to buy (46.1%) and to rent (34.9%)**. Rising home prices and rental costs outpacing wages have made homeownership and stable renting unattainable for many.
- **22% of respondents reported struggles in staying in their current homes** due to increasing rent, making long-term housing stability a major concern.

### 2. Housing Quality & Accessibility:

- **32.6% of respondents struggled to find housing in good condition**, reflecting concerns about aging housing stock and maintenance issues.
- **8.5% of survey participants stated they could not find a home accommodating disabilities**, pointing to a gap in accessible housing.
- **11% sought housing that could accommodate multiple generations**, highlighting a need for larger, multi-family units.

### 3. Discrimination and Housing Barriers:

- **5% reported facing housing discrimination** based on protected characteristics such as race, disability, or family status.
- **5.8% were denied housing due to rental history or past evictions**, while **2.9% faced denials due to a criminal record**.
- **2.3% struggled to find a landlord willing to accept housing vouchers**, limiting options for low-income families relying on rental assistance.

### 4. Location and Transportation Challenges:

- **13.9% of respondents struggled to find housing near shops and services**, while **8.7% had difficulties finding housing near transit options**. This suggests that housing options are not adequately integrated with public transportation and essential services.

### 5. A Segment of the Population is Unaffected:

- **18.5% reported facing no housing challenges**, and **17.5% had not actively looked for housing** in Salem, indicating that some residents are either satisfied with their current situation or are not currently in the housing market.

## Community Voices: Key Comments from Respondents

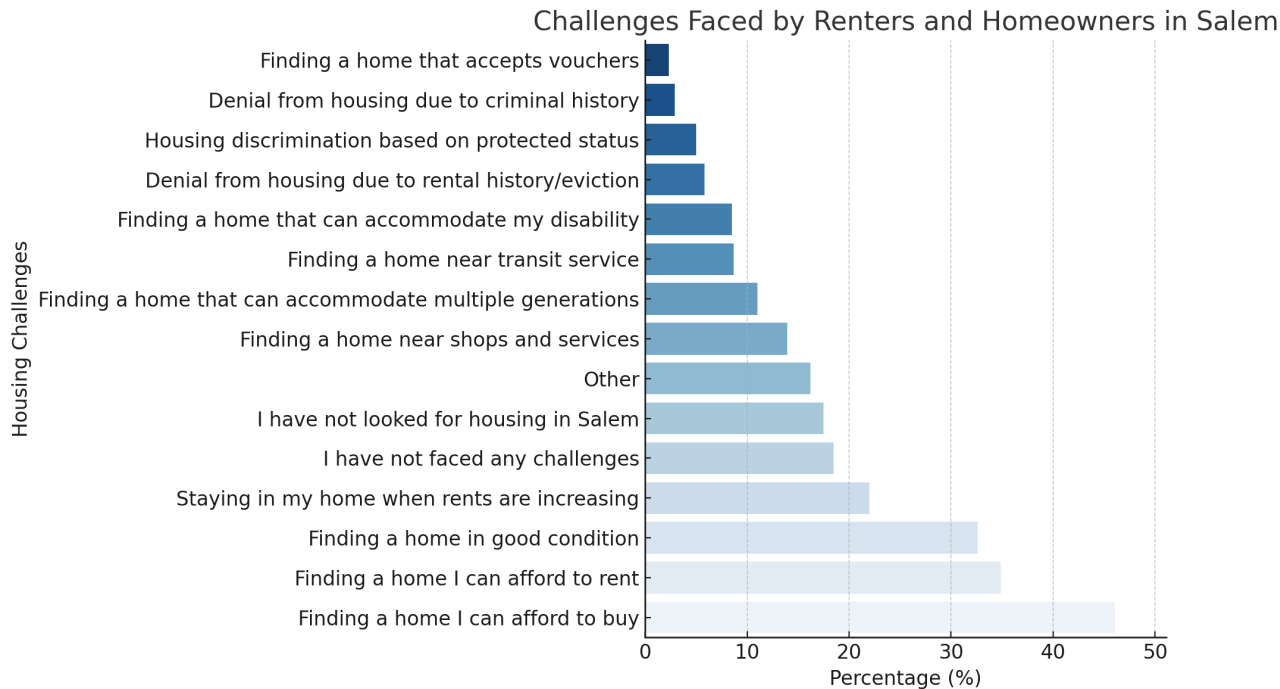
Survey participants shared personal experiences that further illustrate the difficulties of finding and maintaining housing in Salem:

- *“I make decent money, but I still can’t afford to live alone. I’m homeless and working full-time.”*
- *“Rent keeps going up, but wages don’t. I have to keep moving further out, away from work and services.”*
- *“Finding a truly wheelchair-accessible unit is nearly impossible.”*
- *“Landlords don’t accept vouchers, making it impossible to find housing even if you qualify for assistance.”*

## Considerations

The survey results confirm that affordability remains the **biggest obstacle** for renters and buyers alike, while **rising rents and lack of accessible housing exacerbate instability** for vulnerable groups. Additionally, **discrimination and rejection based on financial or legal history further restrict housing choices**.

Future housing policies and strategies should focus on **expanding affordable housing, protecting tenants from rapid rent increases, improving housing quality, and ensuring fair housing access**. Addressing these concerns will be key to making Salem a more inclusive place to live.



## Salem Housing Needs Analysis (2015–2035)

### Summary

To better understand and plan for its future housing needs, the City of Salem commissioned a Housing Needs Analysis (HNA). This study was undertaken in compliance with Oregon’s Statewide Planning Goal 10 to evaluate Salem’s housing supply, forecast future demand, and identify land and policy strategies needed to ensure housing affordability and availability through 2035. The **Salem Housing Needs Analysis (HNA)** outlines Salem’s projected housing needs from 2015 to 2035 in compliance with **Oregon Statewide Planning Goal 10** and related statutes (ORS 197.296 and OAR 660-008). This comprehensive study offers critical data and planning direction to ensure that the City of Salem maintains an adequate supply of housing that is affordable and diverse enough to meet future demand.

### Key Findings

- **Population Growth:** Salem's portion of the Urban Growth Boundary (UGB) is projected to grow by **59,239 people**, reaching a total of **269,274 residents** by 2035. This growth will generate demand for approximately **23,355 new housing units** over the 20-year period.
- **Housing Mix Needs:**
  - 60% of new housing is expected to be **single-family detached**.
  - 5% will be **single-family attached** (e.g., townhomes).
  - 35% will be **multifamily housing** (e.g., apartments, duplexes).
  - The average expected residential density is **8.5 units per net acre**.

- **Land Supply:** Salem has a **surplus of single-family land** but a **deficit of approximately 207 acres** of land designated for **multifamily development**. This shortage threatens the city's ability to meet future demand for affordable and diverse housing options.
- **Housing Affordability:**
  - A large share of Salem households are **cost burdened** spending over 30% of their income on housing.
  - In 2012, Salem had a deficit of nearly **6,400 units affordable to households earning less than \$25,000 annually**.
  - Housing prices increased by **62% between 1990 and 2012**, while inflation-adjusted household income declined, deepening affordability challenges.
- **Demographic Trends:**
  - **Older adults and Millennials** will drive future housing demand, with preferences leaning toward **smaller, denser, and more affordable units**.
  - The **Hispanic and Latino population**, which grew by 57% from 2000 to 2010, is projected to remain a significant portion of housing demand—often with larger households and lower incomes.
  - An aging population suggests increasing demand for **accessible and age in place housing options**.

## Recommendations and Policy Implications

To meet its future housing needs, the HNA recommends that the City of Salem:

1. **Redesignate land** from single-family to multifamily use.
2. **Encourage redevelopment** and infill in mixed-use and commercial areas.
3. **Support housing affordability** by:
  - Allowing accessory dwelling units (ADUs)
  - Exploring density bonuses or zoning flexibility
  - Supporting nonprofit housing development
4. **Monitor and report on housing production and land use** to stay aligned with demand.
5. **Increase housing options** for low- and moderate-income households, including workforce housing and government-assisted development.

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## Jurisdictional Background Data

Salem, the **capital of Oregon**, is a city rich in history, diversity, and economic significance. As the **second-largest city in the state**, it serves as a major hub for **government, education, agriculture, and commerce** in the Willamette Valley. Salem's **population growth, shifting housing market, and evolving economy** have shaped its fair housing landscape, impacting accessibility and affordability for residents across all demographics.

Salem's history dates back thousands of years when it was home to **the Kalapuya people**, an indigenous group that thrived in the Willamette Valley through fishing, hunting, and sustainable agriculture. European-American settlement began in the 1840s with the arrival of **Methodist missionaries and pioneers traveling the Oregon Trail**. The fertile lands and mild climate made Salem an attractive location for farming and trade, establishing its early economy around **agriculture and timber production**.

In 1851, Salem was designated as **Oregon's state capital**, solidifying its role as the political and administrative center of the state. Government institutions, including the **Oregon State Capitol, Supreme Court, and state agencies**, became the city's backbone, providing stable employment opportunities. The establishment of **Willamette University (the oldest university in the western United States)** also contributed to Salem's development as an educational hub.

During the **early 20th century**, industrial growth, the expansion of railroads, and federal investments during the **New Deal era** led to significant urbanization. However, like many American cities, **racially discriminatory housing policies and redlining practices** during the mid-1900s created lasting disparities in homeownership and access to economic opportunities for communities of color. The **Civil Rights Movement of the 1960s** and the subsequent **Fair Housing Act of 1968** helped dismantle legal segregation, but the effects of past discrimination remain visible in present-day housing inequalities.

Today, Salem's economy has diversified beyond agriculture and government, incorporating **healthcare, technology, and manufacturing**. However, its **rising housing costs, increasing population, and historical zoning patterns** present challenges in ensuring **fair and equitable housing access for all residents**. The following sections examine Salem's demographic shifts, housing affordability trends, and employment landscape, all of which inform the city's fair housing strategies.

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## Demographic Data

This section presents demographic, housing, and economic information that is drawn from the 2020 US Census and American Community Survey (ACS) 2019-2023 estimates unless otherwise noted. Data were used to



analyze a broad range of socio-economic characteristics including population growth, race, ethnicity, disability, employment, poverty, and housing trends. Some of this data is available by Census tract and are shown in geographic maps. Ultimately the information presented in this section is intended to illustrate the underlying conditions that shape housing market behavior and choice in Salem.

To study these concepts, the Census Bureau distributes the American Community Survey every year to a sample of the population. It quantifies the results as one-, three-, and five-year averages. The one-year sample only includes responses from the year the survey was implemented, while the five-year sample includes responses over a five-year period. Since the five-year estimates include more responses, they can be tabulated down to the Census tract level and are considered more robust than the one- or three-year sample estimates.

The City of Salem has experienced steady population growth over the last decade. According to the latest data: The estimated population in 2022 was 175,754, reflecting a **13.5% increase** since 2012. The data shows that the population has increased by 28.9% since 2000, indicating a **significant upward trend** in residents over the past 23 years. This growth can be attributed to several factors, including economic development, job opportunities, and an influx of new residents drawn by the city's amenities and quality of life. Notably, different periods within this timeline may have experienced varying growth rates; for instance, there was a surge during the mid-2000s economic boom, followed by a slower rate during economic downturns. Overall, Salem's population growth reflects broader urbanization and migration trends shaping many cities nationwide.

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### Population Growth

Salem has experienced **steady population growth** due to its **economic opportunities, affordability (compared to Portland), and regional migration trends**.

Year	Population	Growth Rate
2000	136,924	—
2010	154,637	+12.9%
2020	175,535	+13.5%
2023 (est.)	180,000+	+2.5% (since 2020)

Source: U.S. Census Bureau, ACS 2023 Estimates

Key Takeaways:

Salem is **growing faster than the national average**, increasing housing demand.

Migration from **other states (notably California and Washington)** is a major factor.

Population	City of Salem	Oregon	United States
Population estimates, July 1, 2023, (V2023)	177,432	4,233,358	334,914,895
Population estimates base, April 1, 2020, (V2023)	175,478	4,237,279	331,464,948
Population, percent change - April 1, 2020 (estimates base) to July 1, 2023, (V2023)	1.10%	-0.10%	1.00%
Population, Census, April 1, 2020	175,535	4,237,256	331,449,281
Population, Census, April 1, 2010	154,637	3,831,074	308,745,538

Source: U.S. Census Bureau, ACS 2023 Estimates

From April 1, 2020, to July 1, 2023, **Salem’s population grew by 1.10%**, indicating a steady increase. In contrast, **Oregon as a whole experienced a decrease of 0.10%** during the same period. This suggests that while Salem is growing, other areas in Oregon might be experiencing a decline or stagnation. The **United States national population grew by 1.00%**, similar to Salem's rate, but lower than its growth. Salem’s growth rate surpasses the national average.

### Demographic Trends

Analyzing changes in age distribution, cultural diversity, and migration patterns provides valuable insights into the evolving composition of communities and the challenges and opportunities these changes present for infrastructure, housing, and public services.

### Age Distribution

Salem has a **relatively young population**, but the **senior (65+) population is growing rapidly**.

Age Group	City of Salem	Oregon	United States
Under 5 years	5.90%	4.80%	5.50%

Under 18 years	23.10%	19.60%	21.70%
65+ years	15.30%	19.60%	17.70%

Source: U.S. Census Bureau, ACS 2023

The population distribution by age group of Salem includes:

**23% under 18 years old**

**61% aged 18 to 64**

**15% aged 65 and older.**

Salem has a **larger population under 18 years old (23.1%)** than both Oregon (19.6%) and the U.S. (21.7%), indicating a **need for family-friendly housing policies**. The senior population (15.3%) is lower than the state and national averages but still **requires accessible housing solutions**.

Population By Age 2023



Source: U.S. Census Bureau, ACS 2023

Key Takeaways:

- Growing senior population** increases demand for **accessible housing**.
- Working-age adults (18-64)** make up **60% of the population**, driving the economy.

Salem’s **deep historical roots in agriculture, government, and trade** have shaped its **current economic and housing landscape**. While the city has grown into a **diverse and dynamic urban center**, **past housing discrimination, economic disparities, and zoning policies** continue to impact **fair housing choice**. This background analysis highlights **the need for inclusive housing policies**, particularly as **housing costs rise and demographic shifts continue**.

# Demographic and Housing Market Trend Analysis

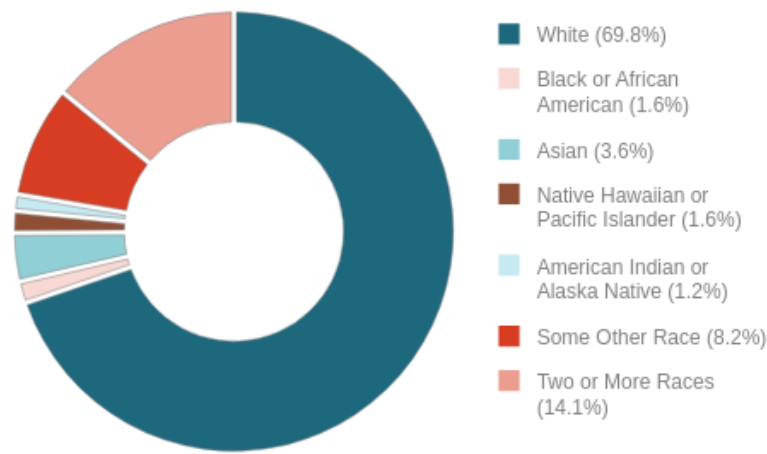
## Population Trends and Racial/Ethnic Composition

Salem has a **diverse population**, with Hispanic/Latino residents making up the **largest minority group**. Salem’s racial composition is predominantly White (72.2%), with growing diversity including 12.2% identifying as two or more races and 22.8% identifying as Hispanic or Latino.

Race/Ethnicity	2000 Census	2010 Census	2020 Census	% Change (2000-2020)
White (non-Hispanic)	75%	70%	65%	-10%
Hispanic/Latino	13%	19%	23%	+77%
Asian	3%	4%	5%	+66%
Black/African American	1%	1.5%	1.8%	+80%
Native American	0.9%	0.9%	0.8%	-11%
Other/Mixed	7%	8%	8%	+14%

Source: U.S. Census Bureau, ACS 2023 Estimates

### Racial Composition



Source: U.S. Census Bureau, ACS 2023

### Key Takeaways:

- The **Hispanic/Latino population has nearly doubled** in 20 years.
- Salem’s **communities of color face disparities in homeownership and rental access**.
- **Communities of color** have grown at a faster rate than White non-Hispanic residents.

- **Diverse cultural and linguistic needs** impact fair housing access and enforcement.

The City of Salem has undergone significant demographic shifts over the past few decades, reflecting broader national trends of increasing diversity. According to the most recent data:

- The **White, non-Hispanic** population has declined steadily from **89.02% in 1990** to **71.22%** in the latest reporting period, signaling a more racially and ethnically diverse community.
- The **Hispanic** population has seen substantial growth, rising from **5.95% in 1990** to **20.09%** currently, indicating increased cultural and economic influence within the city.
- The **Black, non-Hispanic** population experienced moderate growth, from **1.30% in 1990** to **2.00% in 2010**, but slightly declined to **1.33%** in the most recent data.
- The **Asian or Pacific Islander, non-Hispanic** population grew from **2.19% in 1990** to **4.36% in 2010**, though it has since decreased slightly to **3.34%**.
- The **Native American, non-Hispanic** population increased from **1.38% in 1990** to **2.14% in 2010**, before declining to **1.14%**, highlighting ongoing demographic shifts.
- The **foreign-born population** has grown from **5.51% in 1990** to **12.03%** currently, reflecting increased immigration and cultural diversity.
- Individuals with **Limited English Proficiency (LEP)** have also increased from **3.35% in 1990** to **8.06%** currently, underscoring the need for expanded language access services in housing programs.

These figures indicate an increasingly diverse population, with notable growth among Hispanic, foreign-born, and multi-racial residents, while the White, non-Hispanic population continues to decline as a share of the overall demographic makeup.

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### Comparison of Racial Composition: Salem, Oregon, and the U.S.

A comparison of Salem’s racial and ethnic demographics against state and national figures provides further insight into local trends:

Race/Ethnicity	Salem	Oregon	United States
White alone	69.80%	85.60%	75.30%

Black alone	1.60%	2.40%	13.70%
American Indian and Alaska Native alone	1.20%	1.90%	1.30%
Asian alone	3.50%	5.20%	6.40%
Native Hawaiian and Pacific Islander alone	1.60%	0.50%	0.30%
Two or More Races	14.10%	4.40%	3.10%
Hispanic or Latino	23.40%	14.90%	19.50%
White alone, not Hispanic or Latino	63.90%	72.80%	58.40%

Source: U.S. Census Bureau, ACS 2023 Estimates

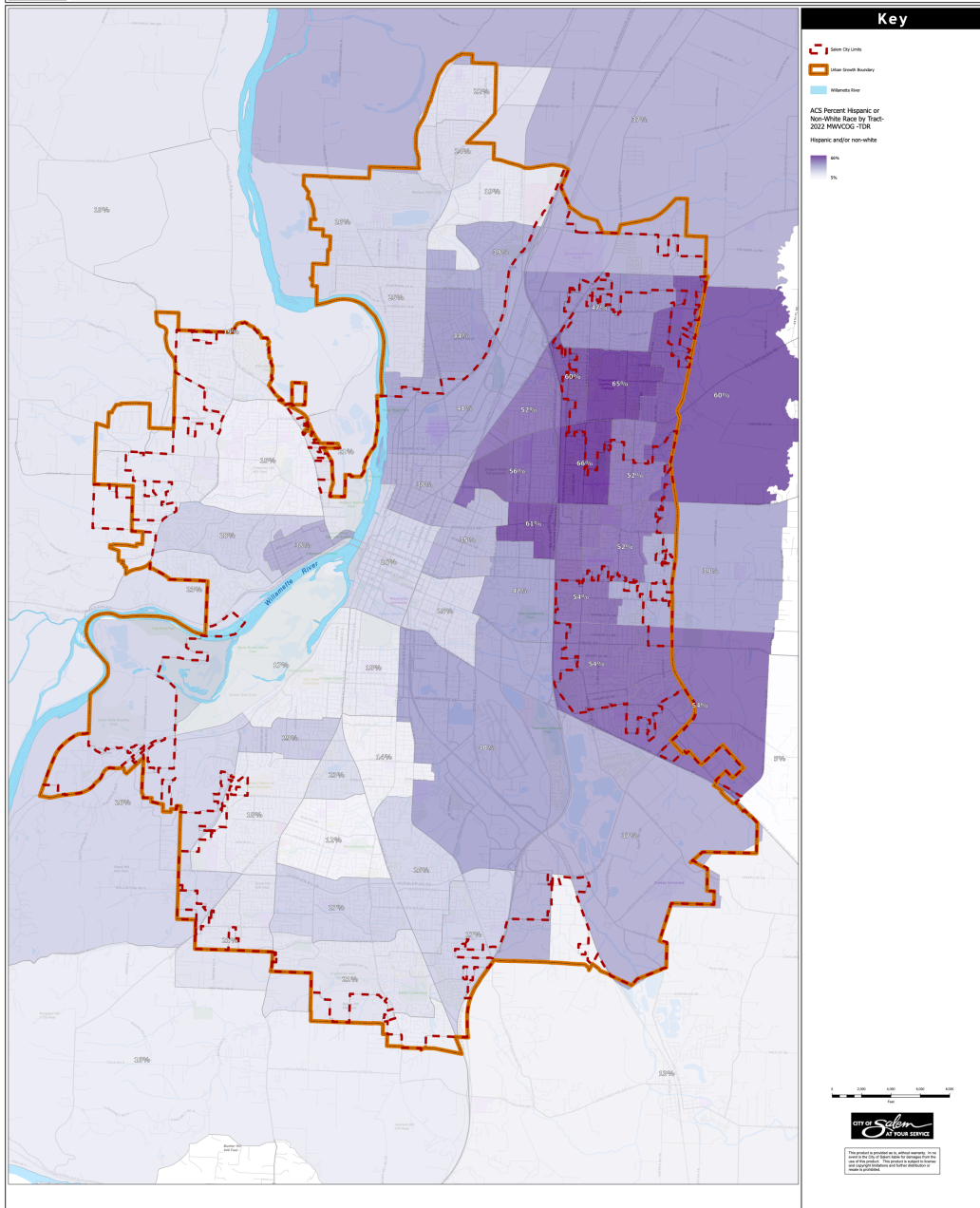
Key Observations:

- **Greater Diversity in Salem:** Salem’s **69.8% White alone** population is lower than Oregon’s **85.6%** and slightly below the national average of **75.3%**, reflecting a more diverse local community.
- **Underrepresentation of Black Residents:** The **Black population in Salem is 1.6%**, well below the **national average of 13.7%**, which may indicate barriers to housing access or lower migration trends for Black households to the region.
- **Growing Multi-Racial Identity:** **14.1% of Salem’s residents identify as Two or More Races**, far exceeding both Oregon’s **4.4%** and the national **3.1%**, suggesting a trend toward a more blended demographic makeup.
- **Higher Hispanic Representation:** The **Hispanic or Latino population (23.4%)** is **significantly higher than Oregon’s 14.9%** and **above the U.S. average of 19.5%**, emphasizing Salem’s need for culturally inclusive housing policies and resources.

These trends highlight the importance of fair housing policies that reflect Salem’s evolving demographics. Language accessibility, anti-discrimination enforcement, and culturally responsive housing initiatives will be critical to ensuring equitable housing opportunities for all residents.



**MARCH**  
**2023**



## Unique Populations and Special Housing Needs

Certain groups within Salem's population face unique challenges in securing stable and affordable housing, necessitating specialized housing policies and targeted support. Among the general population, several groups have specific housing needs that can make it challenging for them to find suitable accommodations. The following sectors identify and discuss these groups and their distinct housing requirements.

### Targeted Populations

Special Populations	City of Salem	Oregon	United States
Veterans, 2019-2023	8,616	252,530	16,569,149
Language other than English spoken at home, percent of persons age 5 years+	22.20%	15.10%	22.00%
Foreign-born persons, percent	12.20%	9.70%	13.90%
With a disability, under age 65 years, percent	11.50%	10.80%	9.10%
Persons without health insurance, under age 65 years, percent	8.50%	6.70%	9.50%

Source: U.S. Census Bureau, ACS 2023 Estimates

### Veteran Population

With 8,616 veterans residing in Salem, there may be a need for affordable and supportive housing options tailored to this group. Veterans often face unique challenges, including mental health issues and the need for accessibility, which could significantly influence housing preferences and requirements.

- Total Veterans in Salem: 8,616
- Key Housing Needs:
  - Affordable housing tailored for veterans, particularly those facing economic hardship.
  - Supportive housing with mental health and disability services.
  - Accessibility features to accommodate physical disabilities.

**Recommendation:** Expand housing programs that integrate mental health support, rental assistance, and accessible units for veterans.

### Senior Housing Needs

Category	Total Seniors	Owner-Occupied	Renter-Occupied
Salem	67,028	6,964	2,755
Oregon	1,701,548	236,853	56,477
United States	127,482,865	16,015,654	4,216,918

Source: U.S. Census Bureau, ACS 2023 Estimates



Affordable Senior Apartments

Community Name	Details
Meadowlawn Apartments	55+ Community, 1-3 bedroom units next to a golf course
Englewood West	54 one-bedroom units for seniors 62+, flat rent approx. \$600/month
Providence Place	66 one-bedroom units for seniors 62+, includes accessible units
Four Oaks	24 one-bedroom units for elderly/disabled; Project-Based Section 8
Stayton Manor	16 one-bedroom units for elderly/disabled; Project-Based Section 8
Wallerwood Apartments	22 one-bedroom units for elderly/disabled; Project-Based Section 8
Southview Terrace	58 one-bedroom units for seniors

Senior Households by Tenure

	Total	Owner- Occupied			Renter-Occupied		
		65-74 Years	75-84 Years	85 and over	65-74 Years	75-84 Years	85 and over
Salem	67,028	6,964	4,000	877	2,755	1,561	936
		10.4%	6%	1.3%	4.1%	2.3%	1.4%
Oregon	1,701,548	236,853	107,330	35,565	56,477	30,262	20,290
		14%	6.8%	2%	3.3%	1.7%	1.2%

Source: U.S. Census Bureau, ACS 2023 Estimates

Key Takeaways:

1. Growing Senior Population: Salem has 67,028 seniors, with a notable portion (over 10%) in the 65-74 age group, indicating a rising demand for senior-friendly housing.
2. Homeownership vs. Renting Trends:
  - Salem’s senior homeownership rate is lower compared to Oregon.
  - Only 6,964 seniors own homes, while 2,755 are renters, highlighting the need for affordable rental options for aging residents.
3. Increased Housing Vulnerability with Age:
  - Homeownership drops significantly for those 85 and older, with only 877 seniors in this group owning homes in Salem.
  - A growing number of elderly renters (1,561 in the 75-84 group and 936 in the 85+ group) may struggle with affordability, accessibility, and housing stability.
4. Comparison with Oregon:

- Salem has a lower percentage of homeowners in the 75+ age groups compared to the state.
- Senior renters (especially 75+) make up a larger share in Salem, suggesting greater demand for assisted living, accessible housing, and rental support programs.

### Recommendations:

- **Expand affordable senior housing options**, particularly for **renters aged 75 and older**.
- **Promote aging-in-place initiatives**, such as home modifications and financial assistance for senior homeowners.
- **Increase assisted living facilities** and ensure rental units are **ADA-accessible**.
- **Develop housing programs** that integrate healthcare services to support elderly residents.

### Assisted Housing Units

#### Independent and Assisted Living Communities

Facility Name	Address	Services Offered
Bonaventure of Salem	3411 Boone Rd SE, Salem, OR 97317	Independent Living, Assisted Living, Memory Care
Boone Ridge Senior Living	2950 Boone Rd SE, Salem, OR 97306	Assisted Living, Memory Care
Capital Manor	1955 Dallas Hwy NW, Salem, OR 97304	Independent Living, Residential Care, Memory Care
The Springs at Sunnyview	1950 45th Ave NE, Salem, OR 97305	Independent Living
The Springs at Willowcreek	4398 Glencoe St NE, Salem, OR 97301	Assisted Living, Memory Care
Prestige Senior Living Southern Hills	4795 Skyline Rd S, Salem, OR 97306	Assisted Living
Meadow Creek Village	3988 12th Street Cutoff SE, Salem, OR 97302	Assisted Living, Respite Care
Cedar Village Assisted Living & Memory Care	4452 Lancaster Dr NE, Salem, OR 97305	Assisted Living, Memory Care

### Disability Considerations

- The data shows that 11.5% of individuals under age 65 are living with a disability. This indicates a need for accessible and adaptable housing options in Salem. Ensuring that housing is compliant with ADA standards and includes features that support independent living for people with disabilities will be necessary.
-

**Key Housing Needs:**

- Increased inventory of ADA-compliant housing.
- Affordable independent living options

**Recommendation:** Encourage incentives for developers to build accessible units and ensure ADA compliance in rental housing.

**Disability by Age for the Total Population**

Jurisdiction	Under 18 Years	18 to 64 Years	65 Years and Older
Salem	23.06%	61.68%	15.26%
Oregon	20.20%	61.7%	18.63%
United States	22.16%	61.00%	16.84%

Source: U.S. Census Bureau, ACS 2023 Estimates

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**Health Insurance Status**

The statistic that 8.5% of residents under age 65 lack health insurance could correlate with economic vulnerabilities. This economic factor may limit options for stable housing, suggesting that affordable and secure housing solutions are necessary to address the financial pressures on this demographic.

Overall, Salem’s housing initiatives might benefit from a multifaceted approach that includes:

- The development of affordable housing targeted toward veterans and individuals with disabilities.
- Multilingual housing assistance services to serve the diverse linguistic population.

**Health Insurance Status and Housing Stability**

- Key Housing Needs:
  - Stable housing to prevent medical-related evictions.
  - Affordable housing initiatives for economically vulnerable populations.

**Recommendation:** Integrate housing support with healthcare programs to ensure long-term stability.

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**Language Diversity**

Approximately 22.2% of the population speaks a language other than English at home. This suggests a need for housing services and communication that accommodates non-English speakers. It highlights the importance of culturally sensitive housing programs and multilingual resources to ensure all residents can access housing information and assistance.

- **Residents Speaking a Language Other than English at Home: 22.2%**
- **Key Housing Needs:**
  - Multilingual housing assistance and outreach services.
  - Culturally competent landlord-tenant mediation programs.

**Recommendation:** Establish a language access plan, including translated housing materials, consistent translation services, and/or bilingual staff in housing agencies.

**Foreign-Born Population**

With 12.2% of the city’s residents being foreign-born, there may be specific housing solutions needed that cater to diverse cultural needs and situations. Affordable housing options will be essential for these populations, as many may experience economic challenges upon relocating.

- **Foreign-Born Residents in Salem: 12.2%**
- **Key Housing Needs:**
  - Culturally responsive housing options and rental assistance.
  - Pathways to homeownership for immigrant families.

**Recommendation:** Expand homebuyer assistance programs across all low-to-moderate income Salem residents, particularly focusing marketing towards traditionally underserved populations.

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**Aligning Housing Supply with Household Size in Salem**  
**“Right-Sizing” the Housing Stock for Smaller Households**

**Composition of Households in Salem, Oregon**

Salem has 56,923 households, of which **66% are family households and 34% are non-family** households.

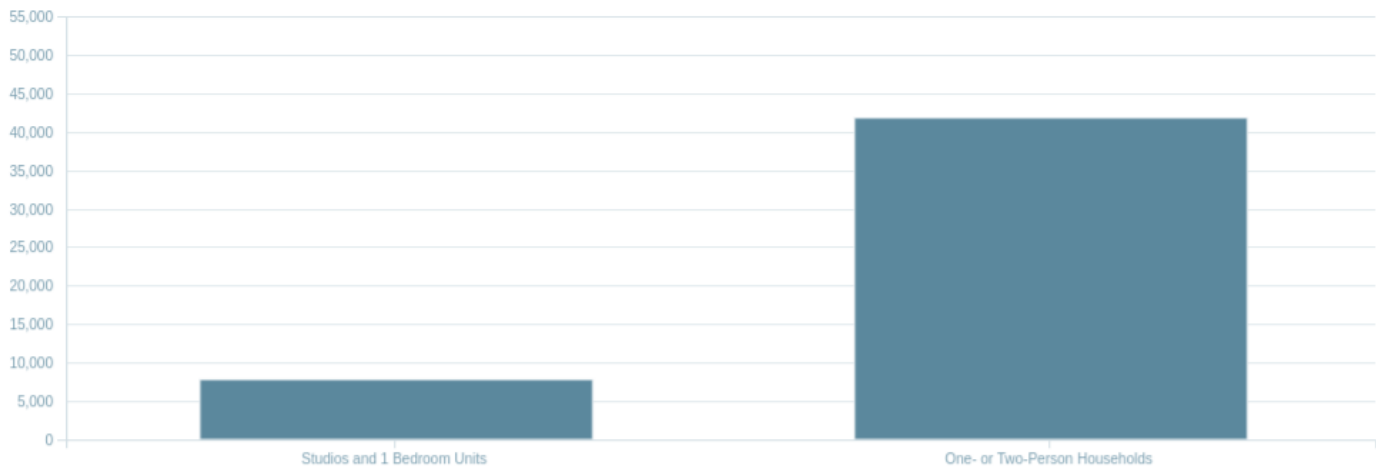
- Single-person households: 29% (higher than the regional average of 25%).
- Households with children: 34%, which is higher than the Oregon state average of 27%.
- Non-family households: 34%, higher than the regional average of 29%.

As household sizes continue to shift, aligning the housing stock with demographic realities—often referred to as “right-sizing”—has become a critical housing issue in Salem. In 2023, **one- and two-person households** made up **62.4%** of all households in the city (**41,839 total**), yet **studio and one-bedroom units** accounted for only **7,873** rental units, or just **26.5%** of all rented housing. This stark disparity highlights a structural mismatch between the type of housing available and the type of households that most commonly exist.

Many small households—including seniors aging in place, single adults, and young renters—occupy housing that is larger and more costly than they need, often due to a lack of appropriately sized and affordable alternatives. This inefficiency in the housing market contributes to unnecessary rent burdens, underutilization of larger homes, and increased competition for affordable family-sized units. At the same time, developers often prioritize larger or more lucrative housing products, leaving gaps in supply for smaller units that could relieve pressure across the housing market.

Right-sizing the housing stock involves **encouraging the development of smaller units**—such as studios, one-bedroom apartments, accessory dwelling units (**ADUs**), and **micro-housing**—particularly in **walkable, transit-accessible neighborhoods**. These units are generally more affordable to build and operate, making them a key strategy for increasing affordability without deep subsidies. In addition, smaller units can help older adults downsize while staying in their communities, offer entry-level housing for young workers, and provide dignified options for individuals transitioning out of homelessness or institutional settings.

Expanding the supply of small units not only meets the evolving needs of Salem's population but also creates a more balanced, flexible, and inclusive housing ecosystem. Local policy levers—such as **zoning code updates**, **density bonuses**, **reduced parking requirements**, and **expedited permitting**—can play a vital role in supporting this shift. Right-sizing is not about forcing people into smaller homes, but about ensuring the housing market includes sufficient diversity in unit types so that all residents can find housing that fits their needs and budgets.



Source: U.S. Census Bureau, ACS 2023

### Income Characteristics in Salem, Oregon

Household income is a key determinant of socio-economic status and affordability for housing, transportation, and other essential living costs. Understanding the distribution of household income in Salem provides insight into residents’ financial resources and the type of housing they can afford.

Income Data	City of Salem	Oregon	United States
Median household income (in 2023 dollars)	\$71,900	\$80,426	\$78,538
Per capita income in past 12 months (in 2023 dollars)	\$36,477	\$44,063	\$43,289
Persons in poverty, percent	14.70%	12.20%	11.10%

Source: U.S. Census Bureau, ACS 2023 Estimates

### Median Household Income

The median household income in Salem, Oregon, was **\$71,900** in 2023. This figure is lower than the statewide median of **\$80,426** and the U.S. median of **\$78,538**. Additionally, per capita income in Salem was **\$36,477** in 2023.

### Income Distribution

The income distribution among Salem households shows a significant share of residents earning below the statewide median:

Income Bracket	Percentage of Households
Less than \$10,000	5.1%
\$10,000 – \$19,999	7.7%
\$20,000 – \$29,999	9.2%
\$30,000 – \$39,999	9.8%
\$40,000 – \$49,999	9.6%
\$50,000 – \$59,999	8.4%
\$60,000 – \$74,999	12.6%
\$75,000 – \$99,999	13.1%
\$100,000 – \$124,999	9.7%
\$125,000 – \$149,999	5.2%
\$150,000 – \$199,999	5.1%
\$200,000 and above	4.5%

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## Economic Profile and Employment

### Major Employers in Salem

Salem’s economy is driven by **state government, healthcare, and manufacturing**.

Sector	Major Employers
Government	State of Oregon, Marion County, City of Salem
Healthcare	Salem Health, Kaiser Permanente, Santiam Hospital
Education	Salem-Keizer School District, Willamette University
Agriculture	NORPAC Foods, Henningsen Cold Storage
Manufacturing	Garmin, Kettle Foods, West Salem Machinery

Source: Oregon Employment Department 2023

### Unemployment and Wages

Year	Salem Unemployment Rate	Oregon Unemployment Rate
2010	10.8%	10.5%
2020	7.2%	7.0%
2023	4.8%	4.2%

Source: Oregon Employment Department 2023

### Key Takeaways:

- Unemployment has declined but remains slightly higher than the state average.
- Job growth in healthcare, logistics, and construction is helping economic recovery, according to Oregon Employment Department data.

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## Affordability Challenges and Barriers to Housing Access

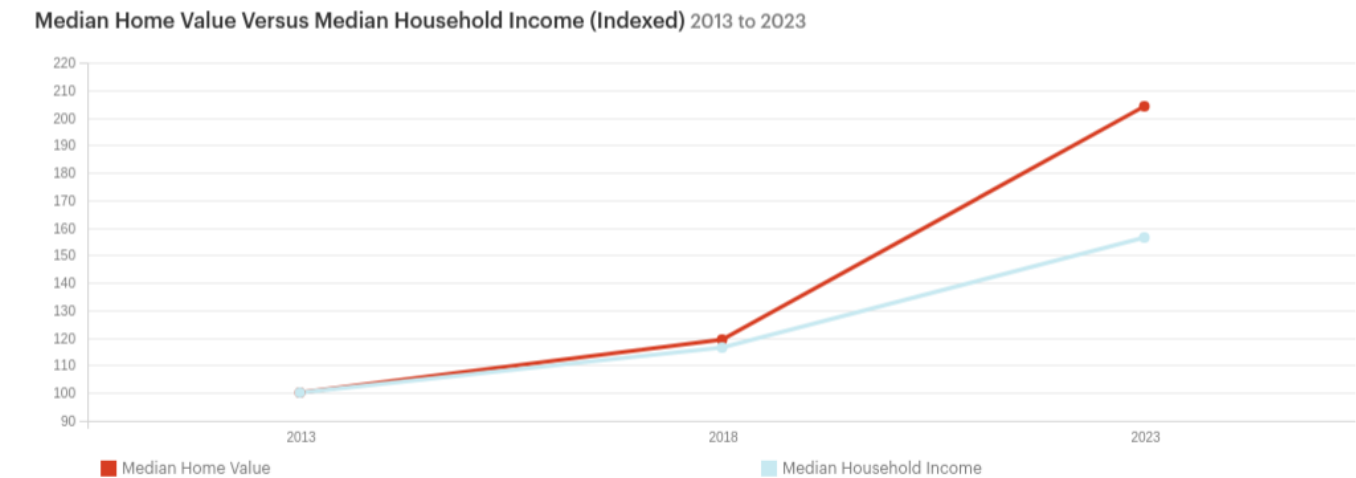
### Housing Cost Burden

Households are considered **cost-burdened** if they spend **more than 30% of income on housing costs**.

Income Level (AMI)	% of Cost-Burdened Renters	% of Cost-Burdened Homeowners
Extremely Low (<30% AMI)	86%	72%
Very Low (30-50% AMI)	64%	58%
Low (50-80% AMI)	42%	39%

Source: HUD CHAS 202

## Disparities Between Housing Costs and Household Income Growth



U.S. Census Bureau (ACS 2013–2023), HUD CHAS, and the City of Salem’s 2024 Housing Needs Assessment.

An analysis of housing cost trends in Salem from 2013 to 2023 reveals a substantial increase in median home values that has significantly outpaced the growth in household income. Over this 10-year period, the median **home value** in Salem **increased by approximately 104.3%**, rising from \$187,200 to \$382,400 in nominal dollars. In comparison, the **median household income** grew by only **56.4%**, from \$45,971 to \$71,900. This imbalance between housing costs and income reflects a structural barrier to housing access, particularly for first-time homebuyers, renters attempting to transition into ownership, and low-income households. When these figures are indexed to their 2013 values, the growing disparity becomes even more pronounced: while **home values more than doubled, income growth was relatively modest**, illustrating the growing affordability gap.

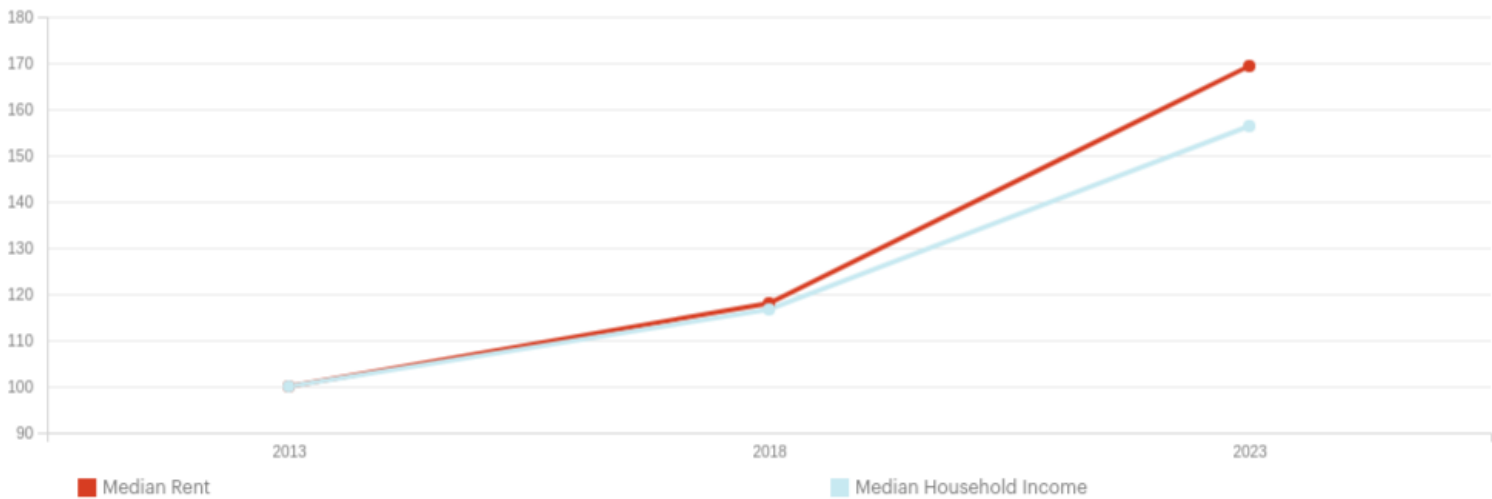
This trend limits fair housing choice by restricting access to homeownership and forcing cost-burdened households to remain in rental housing. These impacts disproportionately affect communities of color, persons with disabilities, and other historically marginalized groups who already face barriers to wealth accumulation and housing stability. The growing cost of ownership may also result in **increased displacement pressure** for long-term residents, **contributing to patterns of segregation** and reinforcing socioeconomic inequality. Addressing this disparity is critical to affirmatively furthering fair housing in Salem.

Strategies may include **increasing the supply of affordable for-sale housing**, preserving naturally occurring affordable housing stock, **expanding homebuyer assistance programs**, and **reviewing land use and zoning**



regulations to promote a diversity of housing types. By narrowing the gap between housing costs and incomes, the City can improve access to opportunity and expand equitable housing choices for all residents

Rent Growth Outpacing Income Growth in Salem

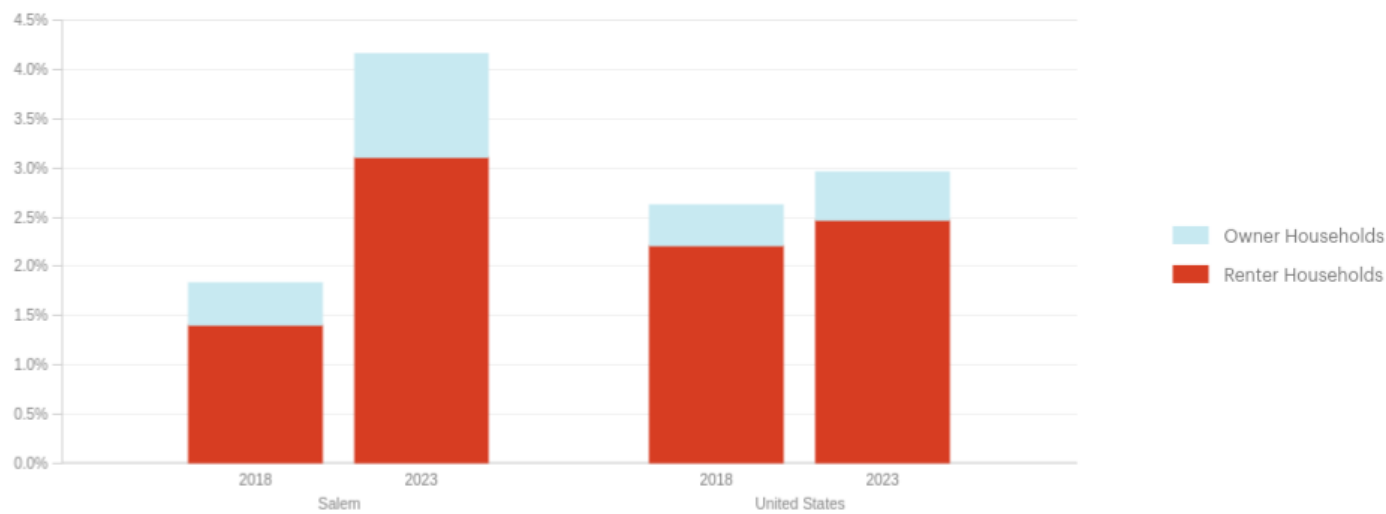


U.S. Census Bureau (ACS 2013–2023), HUD CHAS, and the City of Salem’s 2024 Housing Needs Assessment.

Between 2013 and 2023, the cost of renting in Salem increased significantly faster than household incomes, exacerbating housing affordability challenges for many residents. Over this 10-year period, the median monthly **rent rose from \$781 to \$1,323**—an increase of approximately **69.4% in nominal dollars**. In comparison, the **median annual household income** increased from **\$45,971 to \$71,900, a gain of only 56.4%**. When indexed to 2013 values (set to 100), the disparity becomes more apparent. While household income has grown steadily, rental costs have risen at a sharper rate, indicating that housing costs are increasingly consuming a larger share of household budgets. As rents rise faster than incomes, **the proportion of cost-burdened renters**—those spending more than 30% of their income on housing—**continues to grow**. These dynamics limit housing choice, increases the risk of displacement, and reduces access to safe and stable housing in high-opportunity areas. The misalignment between income and rent growth contributes to systemic barriers that restrict housing mobility and perpetuate patterns of segregation and inequality.

Addressing this affordability gap requires a multi-pronged approach, including the preservation and production of affordable rental units, targeted rental assistance, and zoning reforms to enable diverse housing types. Ensuring that rent growth does not continue to outpace income growth is essential to advancing fair housing in Salem and promoting equitable access to housing opportunities.

**Increase in Severely Crowded Households (More than 1.5 persons per bedroom on average)**



U.S. Census Bureau (ACS 2013–2023), HUD CHAS, and the City of Salem’s 2024 Housing Needs Assessment.

The rate of severe household crowding in Salem has more than doubled over the past five years, highlighting a growing strain on the city’s housing supply and affordability. According to the U.S. Census Bureau, a household is considered severely crowded when there are more **than 1.5 persons per bedroom on average**—a condition often associated with housing insecurity, lack of housing options, and economic hardship.

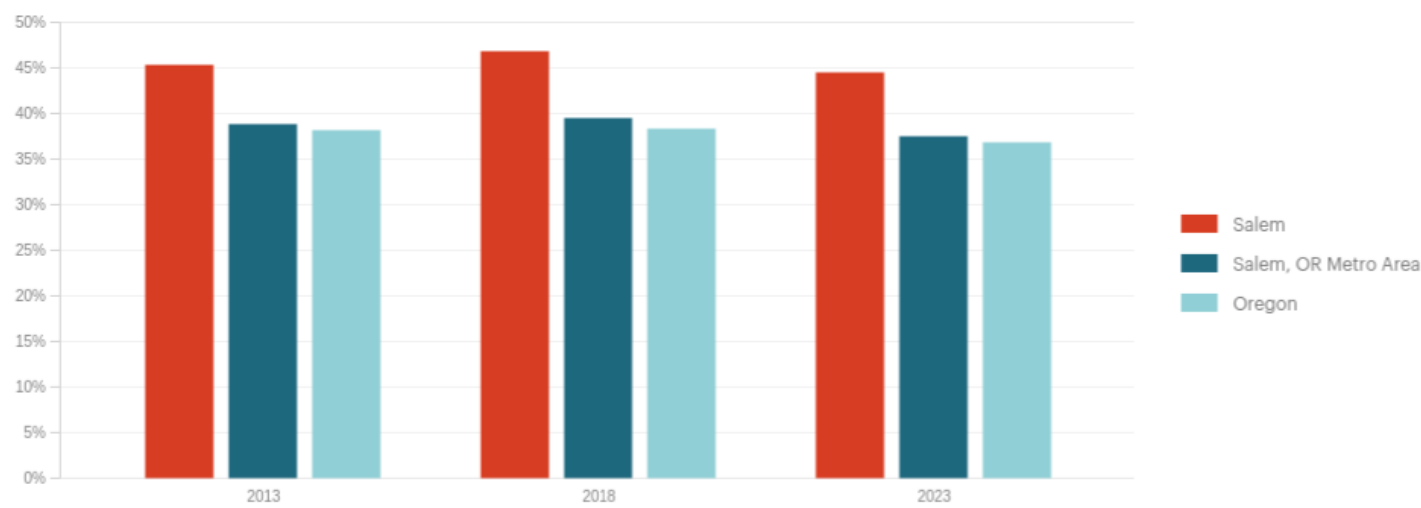
**In 2018, 0.9% of Salem households reported living in severely crowded conditions. By 2023, that share had increased to 2.0%, surpassing the national average of 1.2%.** This growth signals that more families and individuals in Salem are doubling up or living in undersized units, often due to high housing costs, limited affordable options, or discriminatory barriers to securing housing of appropriate size.

Severe crowding disproportionately affects renter households, which tend to have lower incomes and less housing stability. Immigrant families, multi-generational households, and communities of color—particularly Hispanic and Latino households—are also more likely to experience overcrowding. These patterns are linked to historical and systemic inequities in housing access and availability, and represent a potential impediment to fair housing choice.

The increase in severe crowding suggests a need for targeted interventions to expand the availability of affordable, family-sized rental units, reduce cost burden, and ensure equitable access to housing for all household sizes. Monitoring trends in crowding—particularly among renters and protected class populations—

should remain a priority as the city evaluates housing needs and develops strategies to affirmatively further fair housing.

### High Share of Renter Households in Salem

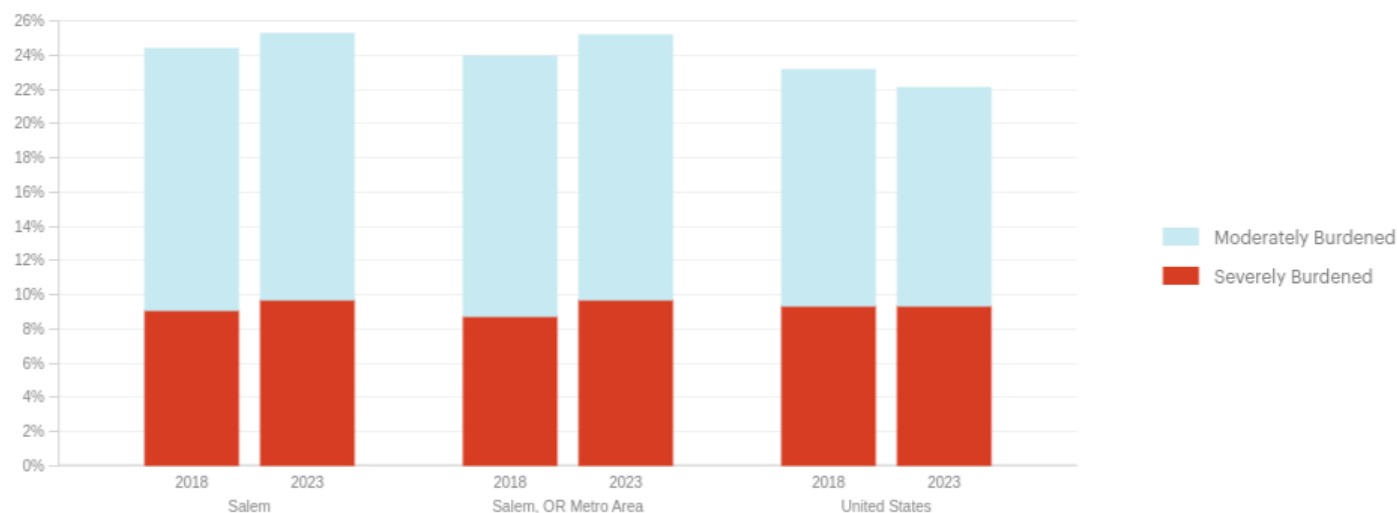


U.S. Census Bureau (ACS 2013–2023), HUD CHAS, and the City of Salem’s 2024 Housing Needs Assessment.

Rental housing plays a critical role in Salem’s housing ecosystem, serving a diverse cross-section of the population, including low- and moderate-income households, younger residents, and protected class groups who often face barriers to homeownership. As of 2023, approximately **44.3% of households in Salem were renters**, a figure notably higher than both the state average (36.6%) and the national average (35.0%). While the share of renters in Salem has declined slightly from **45.1% in 2013**, the city continues to maintain a significantly larger renter population than many comparable jurisdictions. This sustained demand underscores the importance of ensuring that adequate, high-quality, and affordable rental options are available across neighborhoods and income levels.

A high renter population can be a reflection of housing affordability challenges, particularly when home prices rise faster than household incomes. It can also reflect the availability of housing types that better match the needs of smaller households, as well as lifestyle preferences or barriers to mortgage credit. However, renters are also more likely to experience housing instability, cost burdens, and overcrowding—all of which disproportionately impact communities of color, people with disabilities, and other protected class groups. Given the relatively large share of renters in Salem, efforts to **affirmatively further fair housing** must include robust strategies to preserve and expand the city’s rental housing stock. These strategies may include strengthening tenant protections, increasing the production of income-restricted units, and improving access to neighborhoods with high-quality schools, transit, and employment opportunities. Ensuring equitable treatment for renters and equal access to rental housing free from discrimination remains a core fair housing priority.

## Cost Burden Among Homeowner Households



U.S. Census Bureau (ACS 2013–2023), HUD CHAS, and the City of Salem’s 2024 Housing Needs Assessment.

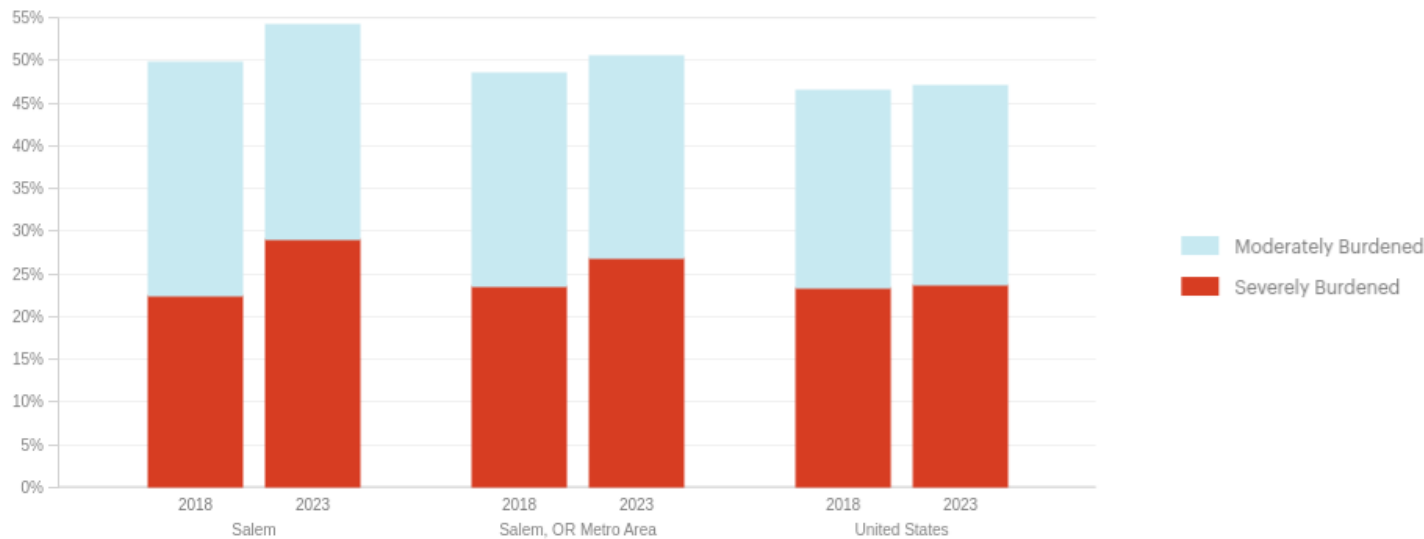
Cost burden remains a growing challenge for many Salem households, including homeowners. Between 2018 and 2023, the share of owner-occupied households in Salem that were **moderately or severely cost burdened**—defined as spending more than 30% of their household income on housing—**increased from 24.3% to 25.2%**. This rate surpasses both the **Salem Metro Area average (25.1%)** and the **national average of 22.1%**. While much attention is often given to rental housing affordability, this trend underscores the pressures that homeowners face as housing costs—including mortgage payments, property taxes, and insurance—continue to rise faster than incomes for many households. Cost burdened owners are particularly vulnerable to economic shocks, deferred maintenance, and foreclosure risk, especially those on fixed or limited incomes such as seniors, first-time homebuyers, and low-income households.

Homeownership cost burdens can also reflect broader inequities in the housing market. Households of color, especially Black and Latino homeowners, are more likely to have lower incomes and fewer financial buffers, making them more susceptible to housing cost pressures. For households with disabilities, limited earning capacity or high medical expenses may further compound these challenges.

The persistence of cost burden among homeowners in Salem presents a potential impediment to fair housing choice. It can limit opportunities for long-term housing stability, intergenerational wealth building, and mobility to neighborhoods with high-performing schools, transportation, and employment access.

To address this, the City of Salem can explore strategies such as targeted property tax relief, foreclosure prevention programs, and expanded access to affordable homeownership opportunities. Supporting existing homeowners—particularly those from historically marginalized communities—must be part of a comprehensive approach to affirmatively further fair housing.

**Rising Cost Burden Among Renter Households**



U.S. Census Bureau (ACS 2013–2023), HUD CHAS, and the City of Salem’s 2024 Housing Needs Assessment.

Cost burden remains one of the most significant barriers to housing stability and choice for renters in Salem. Between 2018 and 2023, the percentage of renter households in Salem who were **moderately or severely cost burdened**—defined as spending more than 30% of household income on gross rent (including utilities)—**increased from 49.7% to 54.1%**. This growing affordability challenge indicates that more than half of all renter households in the city are struggling to meet basic housing costs. Within this group, **severely cost burdened households**—those spending 50% or more of income on rent—are especially vulnerable to eviction, overcrowding, and homelessness. Such levels of housing stress can force families to sacrifice essential needs such as food, healthcare, or transportation to remain housed.

The situation in Salem is more acute than in the surrounding region or nationally. In 2023, Salem’s renter cost **burden rate of 54.1%** exceeded both the **Salem Metro Area’s rate of 50.5%** and the **national average of 46.9%**. This data highlights that Salem faces more severe rental affordability challenges than many peer jurisdictions. Renters are more likely than owners to be members of the most marginalized protected classes under the Fair Housing Act, including people of color, single-parent households (especially female-headed), persons with disabilities, and recent immigrants. As a result, the high and growing rate of cost burden among renters in Salem raises significant fair housing concerns, particularly regarding housing access, choice, and stability.

Efforts to affirmatively further fair housing must include strategies to relieve renter cost burdens. These may include increasing the supply of deeply affordable rental units, expanding rental assistance programs, preserving naturally occurring affordable housing (NOAH), and enforcing protections against rent discrimination and source of income discrimination. Prioritizing affordability for renters is essential to preventing displacement, promoting housing mobility, and ensuring equitable access to opportunity.

## **Housing Affordability and Cost Burden in Salem**

### **Key Takeaways**

The analysis of Salem’s housing market trends from 2013 to 2023 reveals a growing disconnect between household incomes and housing costs, which has serious implications for fair housing access and opportunity. Home values and rents have both risen significantly—home prices have increased by 104.3%, and rents by 69.4%—while household incomes have only increased by 56.4%. This widening affordability gap affects both renters and owners, but the burden is particularly acute for renter households, over half of whom are now cost burdened.

Between 2018 and 2023, the share of renter households experiencing moderate or severe cost burden increased from 49.7% to 54.1%, exceeding both regional and national averages. During the same period, the share of cost burdened homeowner households also rose, reaching 25.2% in 2023. These pressures contribute to increased housing instability, especially for members of protected classes—such as people of color, individuals with disabilities, and low-income households—who are disproportionately renters and are more likely to experience discrimination and systemic barriers in the housing market.

The increase in severely crowded households (from 0.9% to 2.0% between 2018 and 2023) further underscores the lack of affordable, appropriately sized housing. At the same time, there is a notable mismatch between the size of available housing units and household composition, with a significant undersupply of studio and one-bedroom units relative to the high number of one- and two-person households.

In 2023, a clear mismatch existed between the supply of small rental units and the number of smaller households in Salem. The city had 7,873 studio or one-bedroom rental units, making up only 26.5% of all rented housing. In contrast, 41,839 households—62.4% of all households—were comprised of one or two people. This significant gap highlights a potential opportunity for policy and development efforts focused on increasing the supply of smaller, more affordable housing units. Expanding studio and one-bedroom options could not only meet the needs of these smaller households but also free up larger units for families and others who require more space. This strategy could help improve affordability and better align Salem’s housing stock with the current household size distribution.

Despite a slight decline in the renter share of households—from 45.1% in 2013 to 44.3% in 2023—Salem continues to have a renter population that exceeds state and national averages. This high renter demand,

coupled with cost burdens and insufficient housing supply, reinforces the urgency of addressing rental housing affordability and tenant protections as part of any fair housing strategy.

Collectively, these indicators reflect a housing market that places disproportionate strain on vulnerable residents and limits fair housing choice across income levels and demographic groups. To affirmatively further fair housing in Salem, it is essential to expand affordable rental and ownership options, improve access to housing subsidies, invest in family-sized and small-unit housing stock, and mitigate displacement pressures—particularly in areas of opportunity.

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## **Racial and Ethnic Disparities in Salem's Mortgage Lending (2018–2023)**

### **Higher Denial Rates for Black and Hispanic Applicants**

National Home Mortgage Disclosure (HMDA) data indicate that Black and Hispanic applicants face higher mortgage denial rates compared to White applicants. While specific Salem data are limited, these national trends likely reflect local patterns. For instance, in 2020, Black applicants had a denial rate of 27.1%, whereas White applicants had a rate of 13.6% .[Urban Institute+1](#)[Federal Reserve Bank of Minneapolis+1](#)

### **Disparities in Loan Costs**

Nationwide studies have shown that minority borrowers often receive loans with higher interest rates and less favorable terms, even when controlling for creditworthiness. This suggests that factors beyond financial qualifications contribute to the disparities.

### **Historical and Ongoing Barriers**

The Oregon Joint Task Force on Addressing Racial Disparities in Home Ownership highlighted that communities of color in Oregon, including Salem, face systemic barriers to homeownership. These include discriminatory lending practices, lack of access to credit, and historical policies that have limited opportunities for wealth accumulation.

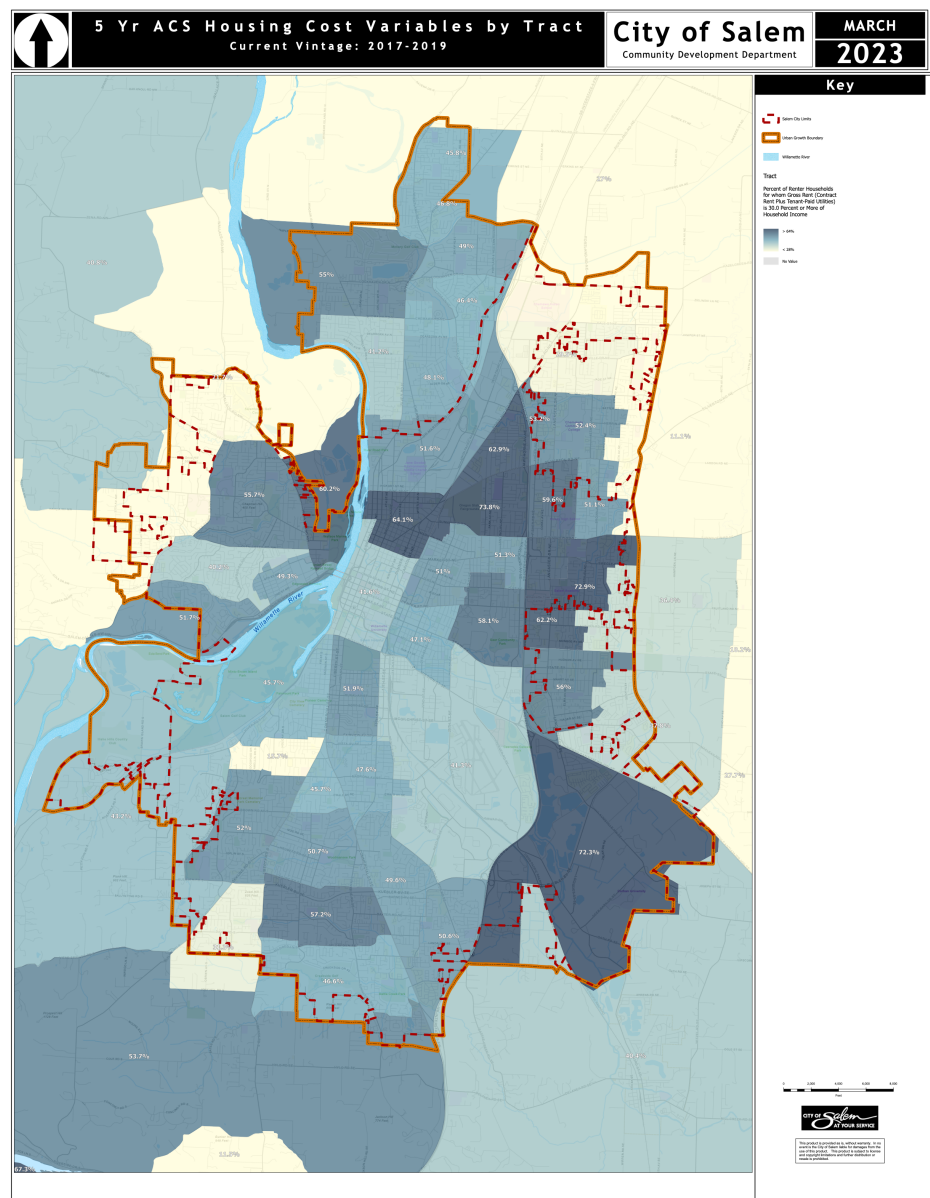
To promote equitable access to homeownership in Salem:

- **Enhanced Data Collection:** Implement more detailed tracking of mortgage applications and outcomes by race and ethnicity to identify specific areas of concern.
- **Community Outreach:** Develop targeted programs to educate minority communities about mortgage options and financial literacy.
- **Policy Reforms:** Review and revise lending policies to ensure they do not inadvertently disadvantage minority applicants.

- **Support Services:** Provide resources such as down payment assistance and credit counseling tailored to the needs of communities of color.

For individuals experiencing housing discrimination, the Fair Housing Council of Oregon offers resources and a platform to report such incidents.

### RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY (R/ECAPS)

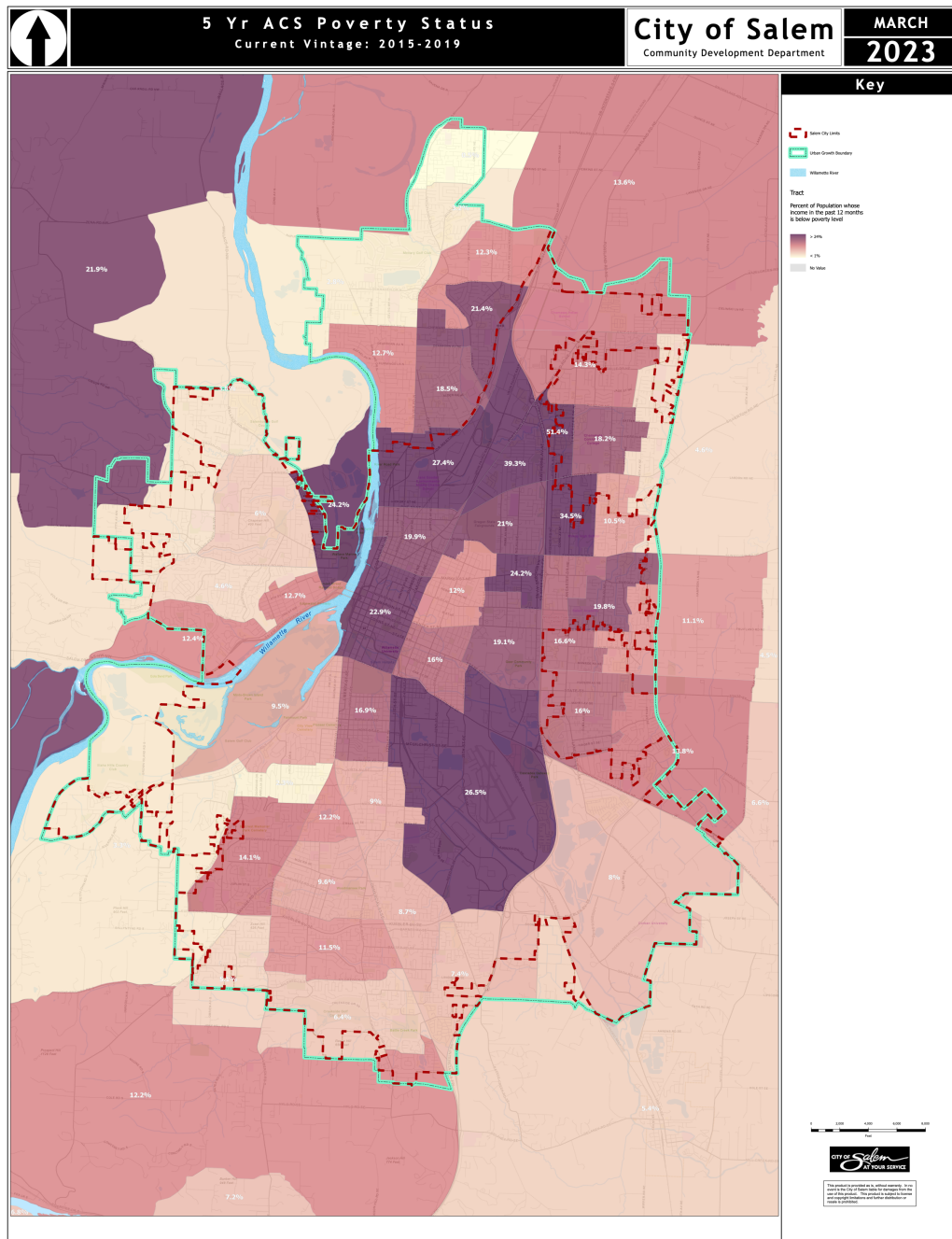


Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) in Salem, Oregon, reflect neighborhoods where a high percentage of residents are both low-income and belong to racial or ethnic minority groups. According to



HUD definitions, these areas meet thresholds for concentrated poverty (typically where 40% or more of residents live below the poverty line) and have higher-than-average racial or ethnic minority representation compared to the metropolitan region. Salem has one currently identified R/ECAP. R/ECAPs are areas where systemic barriers—such as historical redlining, limited access to credit, and exclusionary zoning—have created persistent disparities in housing opportunity, economic mobility, and health outcomes. Residents in these areas often face compounded challenges including limited access to quality schools, transportation, and employment opportunities. Identifying and addressing impediments in R/ECAPs is critical to affirmatively furthering fair housing and ensuring equitable development throughout Salem.

### **High-Poverty and Segregation Areas in Salem**



In Salem, the **overall poverty rate was 14.6% in 2022**, which is higher than both the Oregon state average and the national average. Census data indicate that poverty is not evenly distributed, with certain neighborhoods experiencing significantly higher rates.

- The **highest average neighborhood poverty rate** was found among **Native Hawaiian or Pacific Islander households**, where **22.4%** of residents in these neighborhoods live below the poverty line.
- The **lowest neighborhood poverty rate** was among **Asian households**, living in areas where **12.6%** of the population was below the poverty line.

## Segregation and Integration Patterns in Salem

Salem exhibits **moderate segregation** in housing patterns. The **Dissimilarity Index**—a measure of how racially or ethnically separate different groups are—was **38.7** for Hispanic and Non-Hispanic White residents, indicating moderate levels of segregation.

- **Lower-income neighborhoods in Salem** tend to have higher concentrations of Hispanic and Black households.
- **Higher-income areas** in the western and southern parts of the city tend to have a larger share of White households and lower poverty rates.

## Affordable Housing and Poverty Concentration

There is a **significant concentration of federally subsidized housing in high-poverty neighborhoods**:

- **25.1%** of households living in **Low-Income Housing Tax Credit (LIHTC) properties** are in neighborhoods where more than a quarter of the population is below the poverty line.
- HUD **Public Housing** units, by contrast, tend to be in neighborhoods with lower poverty rates, averaging **14.5% poverty**.

## Challenges in Access to Affordable Housing

- **Rent Burden: 53.1%** of renter households in Salem were cost-burdened in 2022, spending more than **30%** of their income on rent.
- **Senior Housing Needs:** The percentage of seniors (age 65+) living in poverty **rose from 8.0% in 2012 to 10.9% in 2022**, highlighting growing affordability challenges for older residents. While this is lower than the general population rate, seniors may have a more limited ability to increase income over time.

## High-Poverty Neighborhoods in Salem

Salem exhibits notable **geographic disparities in poverty rates**, with certain neighborhoods experiencing significantly higher concentrations of low-income residents.

As of 2022, **14.6%** of Salem's population lived below the federal poverty line, a higher rate than both the Oregon state average (**12.2%**) and the national average (**11.1%**). The highest-poverty neighborhoods in Salem include:

- **North and Central Salem**, where poverty rates range between **20% and 30%**.
- **East Salem**, where certain census tracts exceed **30% poverty rates**, includes one census tract that meets HUD definition of Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs).
- The **lowest poverty rates** are observed in **West and South Salem**, where less than **10%** of the population lives below the poverty line.

## Segregation and Housing Inequality

Salem's **Dissimilarity Index**, a measure of racial and ethnic segregation, shows a **moderate level of segregation** between Hispanic and non-Hispanic White residents, with an index value of **38.7**.

- **Hispanic households** in Salem experience disproportionately higher poverty rates, with **22.8%** living below the poverty line, compared to **14.6%** for the overall population.
- **Black and Native American residents** also experience significantly higher rates of poverty compared to White residents.

### **Affordable Housing and Economic Mobility**

- **25.1%** of households living in **Low-Income Housing Tax Credit (LIHTC) properties** are in high-poverty neighborhoods where more than a quarter of the population is below the poverty line.
- **HUD Public Housing Units**, in contrast, are located in neighborhoods with an average **14.5% poverty rate**, indicating a somewhat more balanced distribution of affordable housing.

### **Key Challenges and Considerations**

1. **Housing Cost Burdens:** More than **53.1%** of renter households in Salem are cost-burdened, meaning they spend **more than 30% of their income** on rent.
2. **Limited Access to High-Opportunity Areas:** Many affordable housing developments are concentrated in low-income neighborhoods, limiting access to well-funded schools, job opportunities, and public services.
3. **Growing Income Disparities:** While Salem's **median family income** increased **48%** from **2012 to 2022**, housing costs rose **78.8%** over the same period, exacerbating affordability issues.

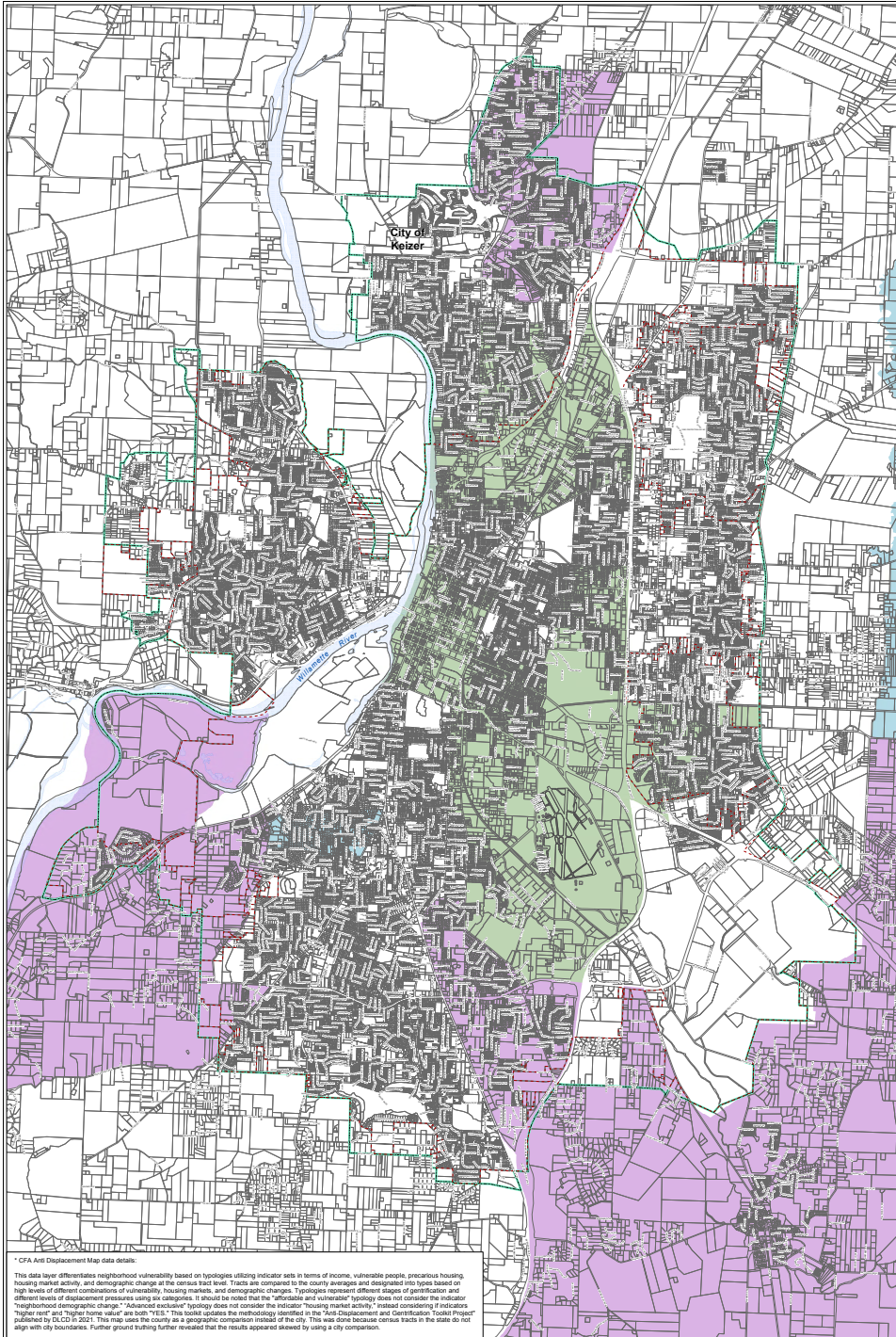
This data underscores the need for **equitable housing policies**, including **expanding affordable housing options in high-opportunity areas** and investing in economic development initiatives in low-income neighborhoods.



# CFA Anti Displacement Map \*

**City of Salem**  
Community Development Department

**MARCH**  
**2023**



## Key

- CFA Anti Displacement Map \*
- Affordable and vulnerable
- Early gentrification
- Active gentrification
- Late gentrification
- Becoming exclusive
- Advanced exclusive
- Salem City Limits
- Urban Growth Boundary
- Tracts
- Willamette River

\* CFA Anti Displacement Map data details:

This data layer differentiates neighborhood vulnerability based on typologies utilizing indicator sets in terms of income, vulnerable people, precarious housing, housing market activity, and demographic change at the census tract level. Tracts are compared to the county averages and designated into types based on high levels of different combinations of vulnerability, housing markets, and demographic changes. Typologies represent different stages of gentrification and different levels of displacement pressures using six categories. It should be noted that the "affordable and vulnerable" typology does not consider the indicator "neighborhood demographic change." "Advanced exclusive" typology does not consider the indicator "housing market activity." Instead considering if indicators "higher rent" and "higher home value" are both "YES." This toolkit updates the methodology identified in the "Anti-Displacement and Gentrification Toolkit Project" published by SLCD in 2021. This map uses the county as a geographic comparison instead of the city. This was done because census tracts in the state do not align with city boundaries. Further ground truthing further revealed that the results appeared skewed by using a city comparison.



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Context?

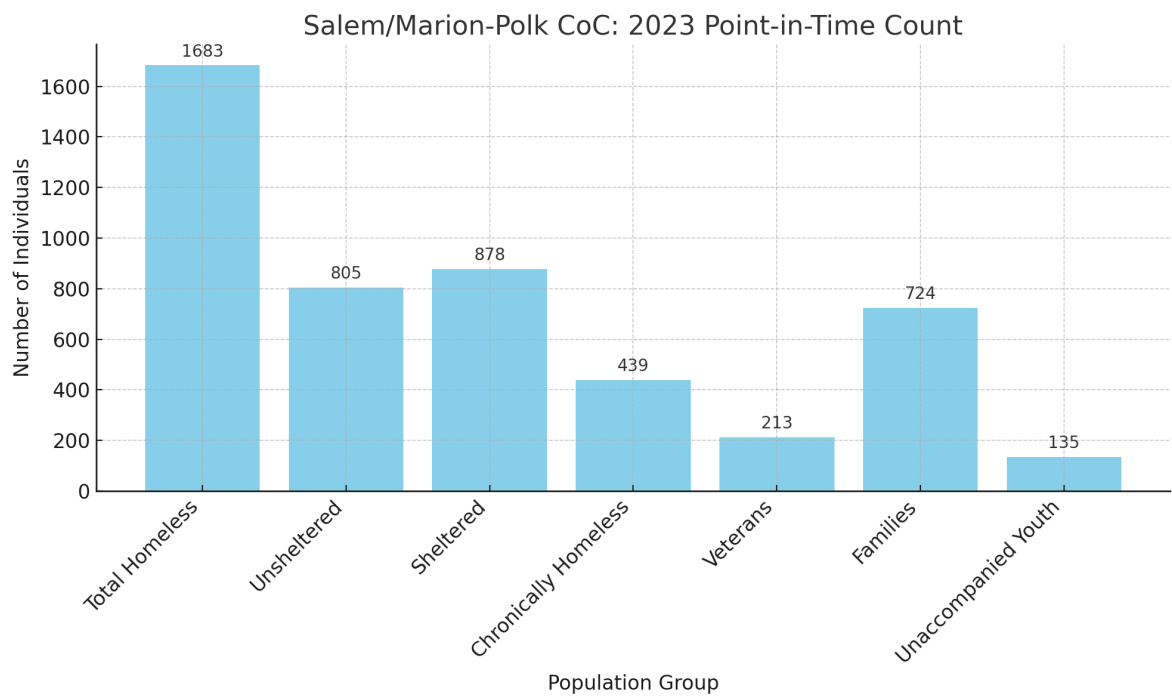
## Homelessness Trends and Fair Housing Implications in Salem

The HUD 2023 Point-in-Time (PIT) count data for the Salem/Marion-Polk CoC (OR-504) highlights persistent and complex housing challenges across sheltered and unsheltered populations. The total count identified 1,683 individuals experiencing homelessness, underscoring the continued demand for deeply affordable and supportive housing options.

### Key Observations:

- A significant number of unsheltered individuals were identified, many of whom face compounding vulnerabilities including mental illness, substance use disorders, or chronic health conditions.
- The PIT count includes adults, unaccompanied youth, veterans, families, and persons with disabilities—demographic groups that often intersect with protected classes under the Fair Housing Act.
- Disparities in access to shelter, safety, and permanent housing options raise urgent equity concerns, especially given the shortage of affordable units and service-linked housing.

These findings point to the need for increased investments in permanent supportive housing, expanded non-discriminatory voucher acceptance, and robust fair housing enforcement to ensure that Salem’s unhoused or housing-insecure residents are not excluded from opportunities due to status, disability, or economic hardship.





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## Introduction to the Community Belonging Survey

To better understand the lived experiences of discrimination and belonging in Salem, the City’s Human Rights Commission (HRC), in partnership with graduate students at Western Oregon University, conducted the 2024 **Community Belonging Survey**. The study, administered between April 23 and May 15, 2024, aimed to capture perceptions and experiences of bias, comfort with reporting discrimination, and overall community inclusion. Over 800 responses were collected, with intentional outreach to historically marginalized populations, including unhoused individuals, people with disabilities, and members of the LGBTQIA+ community. While not statistically representative, the survey offers valuable qualitative and quantitative insight into patterns of exclusion and identifies opportunities for strengthening equity and fair housing in Salem.

## Analysis of Racial and Ethnic Discrimination in Salem (2018–2024)

### 1. Persistent Discrimination Based on Race, Color, and National Origin

The Community Belonging Survey reveals that racial and ethnic discrimination remains one of the most reported types of bias in Salem:

- **70%** of respondents witnessed or heard about discrimination based on **race, color, or national origin**.
- **32%** of respondents personally experienced such discrimination within the last year.
- This type of discrimination was **most frequently reported in businesses**, followed by public outdoor spaces and government offices.

### 2. Compounding Barriers for People of Color

Community members identifying as **Black, Indigenous, Latino/a/e, or multi-racial** often experience layered forms of bias:

- Indigenous respondents gave **one of the lowest ratings (2.21/5)** for perceived levels of equity in the city.
- Comments describe Salem as “the most racist place I’ve lived,” with repeated references to open hostility, especially in downtown areas.

In the **HMDA context**, statewide and national data show consistently higher mortgage denial rates for Black and Hispanic applicants compared to White applicants. Though localized HMDA analysis for Salem was limited, these disparities are echoed in reported homeownership barriers and lived experiences documented in local surveys and complaints.

### 3. Intersection with Language and Immigration

- **42%** of respondents reported discrimination based on **language spoken**, reinforcing challenges faced by immigrants and non-English speakers.
- Survey outreach included Marshallese and Chuukese translations, yet fewer than 20 Pacific Islander/Micronesian respondents participated—highlighting gaps in access and engagement despite intentional efforts.

#### 4. Lack of Trust in Institutions

- Multiple respondents noted experiencing or witnessing **racial bias within law enforcement and government systems**.
- 8 respondents listed **Salem Police Department** as a specific location of discrimination—making it the top “Other” response category.
- Respondents of color were **less likely to feel comfortable reporting bias crimes**, often citing **fear of inaction or retribution**.

#### 5. Racial Disparities in Perceptions of Belonging

- Racial and ethnic minorities reported lower levels of community belonging and rated the city more poorly on discrimination overall.
- The survey highlights “**race, national origin, and income**” as common themes in experiences of discrimination in both public and institutional settings.

#### Key Recommendations (From Report)

1. **Expand Fair Housing Testing** focused on national origin, race, and linguistic profiling.
2. **Enhance outreach** to culturally specific groups, especially underrepresented ones (e.g., Pacific Islanders).
3. **Ensure language access compliance** in housing programs and city services.
4. **Promote diverse hiring and leadership** within city departments and housing providers.
5. **Strengthen accountability** mechanisms for public-facing institutions, including law enforcement and code enforcement.
6. **Increase education** on tenant rights and the city's anti-discrimination protections (especially housing status and national origin).

#### Types of Discrimination Personally Experienced in the past 12 months in Salem (639 respondents)

- 70% Race/Color/National Origin
- 59% Housing Status
- 45% Gender Identity
- 42% Language Spoken
- 36% Sexual Orientation
- 32% Race/Color/National Origin
- 28% Age
- 27% Gender
- 24% Housing Status
- 21% Weight/Body Type



CoC Resource List

Mid-Willamette Valley Homeless Alliance  
Coordinated Entry Assessment Sites

The Beginning of the Housing Match Process in the Marion and Polk Region

Main Access Sites

Agency	Address of Assessment Site	City	Phone Numbers	Days/Hours for Assessments	By appt.	Walk-ins	Specialty Population	Notes:
Center for Hope & Safety	605 Center St NE	Salem	(503) 399-7722	Monday-Friday 9:00am-5:00pm	Yes	No	Domestic and Sexual Violence Survivors	Individuals/Families need to call to be scheduled for a housing assessment
Church at the Park - CCS	3737 Portland Rd NE	Salem	(503) 507-2144	Monday-Friday 8:00am-5:00pm	Yes	No	Program Participants only	Assessments will be scheduled through staff at C@TP - CCS Site
Church at the Park - VOH	1280 Center St NE	Salem	(503) 507-4992	Monday-Friday 8:00am-5:00pm	Yes	No	Program Participants only	Assessments will be scheduled through staff at C@TP - VOH Site
Church at the Park - Young Adult Site	2410 Turner Rd SE	Salem	(971) 372-0549	Monday-Friday 8:00am-5:00pm	Yes	No	Youth and Young Adults (18-24)	Youth and Young Adults that are experiencing homelessness
Easter Seals of Oregon - SSVF	3878 Beverly St NE Suite 5	Salem	(971) 304-7140	Monday-Friday 8:30am-5:00pm	Yes	No	Veterans only	Currently don't have any staffed trained to conduct assessments
Family Promise	1055 Edgewater NW	Salem	(503) 370-9752	Tuesday 10am-12pm & 2pm- 4pm Fridays 10am-4pm	Yes	No	Families	Families need to call Family Promise to have a housing assessment scheduled
Northwest Human Services - HOST Program	1143 Liberty St NE	Salem	(503) 588-5825	Monday-Friday 9:00am-2:00pm	No	Yes	Young Adults (18-24 yrs)	Young Adults that are experiencing homelessness
Northwest Human Services - HOAP	694 Church St NE	Salem	(503) 588-5827	Wednesday & Friday 9:00am- 3:00pm	Yes	No	Wednesdays: Any single individual or families experiencing homelessness Fridays: Women & nonbinary individuals	Call ahead to be scheduled for a housing assessment

Mobile Sites

Agency	Address of Assessment Site	City	Phone Numbers	Days/Hours for Assessments	By appt.	Walk-ins	Specialty Population	Notes:
Santiam Outreach Community Center	280 Santiam Blvd. NE	Mill City	(971) 332-5676	2nd & 4th Friday 10:00am-2:00pm	Yes	No	Specifically for individuals and families that live in those service areas	Call to be scheduled a housing assessment
Polk County Resource Center	1407 Monmouth Independence Hwy	Monmouth	(503) 751-1644	Mondays 9:00am-3:00pm	Yes	No	Specifically for individuals and families that live in those service areas	Visit reception or call to be scheduled for a housing assessment
Polk County Resource Center	1407 Monmouth Independence Hwy	Monmouth	(503) 751-1644	Thursday 9:00am-2:00pm	Yes	No	Specifically for Youth & Young Adults (14-24) that live in those service areas	Youth and Young Adults that are experiencing homelessness
Sheltering Silverton	832 McClaine St	Silverton	(503) 509-4794	2nd & 4th Wednesday 10:00am-2:00pm	Yes	Yes	Specifically for individuals and families that live in those service areas	Walk-in or call to be scheduled a housing assessment

Outreach

Agency	Address of Assessment Site	City	Phone Numbers	Days/Hours for Assessments	By appt.	Walk-ins	Specialty Population	Notes:
Church at the Park - Outreach Services	2640 Portland Rd NE	Salem	n/a	Monday-Friday 11:00am-1:00pm	Yes	No	Any single individual or families expericing homelessness	
Salem Housing Authority	360 Church St SE	Salem			n/a	n/a		

Last updated 11/12/2024

**Affordable Housing Sites Inventory**

Name	Units	Description
Mahonia Crossing	313	Intergenerational affordable housing with 1–3 bedroom garden-style homes.
Gussie Belle Brown Apts (Planned)	120 (Phase 1); up to 200	Planned development with phased expansion; construction expected in 2024.
Grand Fir Apartments	96	Family-focused affordable units managed by Guardian Management.
Sequoia Crossing	60	Publicly owned; prioritizes currently homeless renters.
Southfair Apartments	Not specified	Income-restricted apartments near NE Salem amenities.
Fruitland Meadow Apts	Not specified	Affordable apartment options with various unit sizes.
Jason Lee Manor	Not specified	Affordable housing serving a variety of community needs.
Providence Place	Not specified	Affordable units with family-oriented layouts and services.
Cornerstone Apartments	180	Affordable units studio to 3 bedroom
Fairhaven Gardens	6	Studio to 3-bedroom income-restricted apartments.
Lancaster Terrace	2-3 bedroom units	Affordable rental homes with amenities for families.

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## Historical and Ongoing Barriers

The Oregon Joint Task Force on Addressing Racial Disparities in Home Ownership highlighted that communities of color in Oregon, including Salem, face systemic barriers to homeownership. These include discriminatory lending practices, lack of access to credit, and historical policies that have limited opportunities for wealth accumulation.

HMDA data for Salem indicates significant disparities in mortgage loan outcomes based on ethnicity. In the most recent data:

- **Hispanic or Latino applicants submitted 126 mortgage applications.**
  - **Only 37 (29%) of those applications resulted in originated loans.**
  - **64 applications—more than half (51%)—were denied.**
  - **An additional 3 applications were approved but not accepted.**
- **By comparison, non-Hispanic applicants submitted 563 applications.**
  - **193 loans were originated (approximately 34%).**
  - **249 applications were denied (about 44%), and 25 were approved but not accepted.**

These figures reflect a 5-point lower origination rate and a 7-point higher denial rate for Hispanic or Latino applicants compared to their non-Hispanic counterparts. This disparity suggests that Hispanic households may be facing unequal access to credit, whether through direct discrimination, disparate impact from lending criteria, or indirect barriers such as language, documentation requirements, or lower average credit scores due to systemic inequities.

Moreover, the higher denial rate for Hispanic applicants may discourage future applications and exacerbate disparities in homeownership, wealth accumulation, and neighborhood stability.

## Recommendation

To address this disparity and affirmatively further fair housing:

- Increase targeted homebuyer education and financial counseling services for Hispanic households.
- Expand language access in lending institutions.
- Monitor local HMDA data annually for patterns of disparate impact.
- Strengthen community partnerships with Latino-serving organizations to promote equitable access to mortgage credit.

Income, Race and Ethnicity

Race	Applications Received	Loans Originated	Apps. Approved But Not Accepted	Applications Denied
American Indian or Alaska Native	18	2	0	11
Asian	14	4	2	8
Black or African American	9	3	0	4
Native Hawaiian or Other Pacific Islander	3	2	0	1
White	643	224	28	282
2 or more minority races	3	0	0	2

MSA/MD Aggregate Reports <https://ffiec.cfpb.gov/data-publication/aggregate-reports>

Ethnicity	Applications Received	Loans Originated	Apps. Approved but Not Accepted	Applications Denied
Hispanic or Latino	126	37	3	64
Not Hispanic or Latino	563	193	25	249

MSA/MD Aggregate Reports <https://ffiec.cfpb.gov/data-publication/aggregate-reports>

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Environmental Constraints

Natural Hazards and Implications for Fair Housing

Salem's **Hazard Mitigation Plan (HMP)** identifies a range of environmental risks—such as flooding, wildfires, drought, landslides, and earthquakes—that could significantly impact housing security, especially for low-income and vulnerable populations. The plan highlights how these hazards disproportionately affect people with limited mobility, disabilities, and those living in older, substandard, or non-permanent housing—many of whom belong to federally protected classes under the Fair Housing Act.

Nearly two-thirds of Salem’s residential housing was built before modern flood and seismic standards. Mobile homes and multifamily units, which house many low-income and renter households, are particularly susceptible to earthquake damage and flood risks. Vulnerable populations, including seniors (13.3% of whom live alone), people with ambulatory difficulties (7% citywide, 24.5% among seniors), and non-English speakers (24.1% speak a language other than English at home), are less likely to receive timely emergency communications or access emergency services during a disaster.

The HMP also notes that affordable housing development may be impeded by environmental constraints. Many areas with available land for new housing are located in flood-prone zones or lack the infrastructure resilience required to support new development. Infrastructure failures—such as power loss or road closures—can limit access to housing, health care, and employment, further isolating communities already facing barriers to opportunity.

In planning for equitable housing access, Salem must integrate hazard resilience strategies into affordable housing planning, prioritizing siting in areas of low environmental risk and investing in upgrades for older housing stock. Strengthening these efforts can help prevent displacement, reduce exposure to hazards, and advance fair housing goals for all residents.

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## Housing and Infrastructure Vulnerabilities Impacting Fair Housing

Salem’s aging housing stock and fragile infrastructure expose the community to elevated risks from natural hazards, with significant implications for low-income residents, renters, and members of protected classes under the Fair Housing Act.

### Housing Stock Vulnerabilities

- **High Exposure to Hazards:** Mobile homes and non-permanent structures make up 4.2% of Salem’s housing and are disproportionately vulnerable to earthquakes, windstorms, and flooding. These housing types are often occupied by low-income households who have limited resources to relocate or retrofit their homes.
- **Outdated Construction:** Approximately two-thirds of Salem’s residential housing was built before the 1990 adoption of seismic building standards. Over half (54%) of homes were built before flood elevation standards were locally implemented in 1979. This leaves a large portion of the city’s housing stock—especially affordable housing—at greater risk of structural failure in a disaster.

These vulnerabilities can contribute to higher displacement risk, longer recovery times, and barriers to accessing safe, stable housing—particularly for those with limited financial means or disabilities.

### Critical Infrastructure Vulnerabilities

- **Transportation Dependence and Fragility:** Roads and bridges in Salem are widely exposed to flood, landslide, and seismic risk. Infrastructure damage may isolate residents, especially those who depend on public transit, and delay emergency response to lower-income neighborhoods.
- **Limited Energy Resilience:** All of Salem’s electricity is generated outside the region, with no redundancy in the transmission system and only minimal backup in the distribution network. This heightens the risk of

prolonged outages, particularly harmful for people with medical or mobility needs, many of whom reside in older or affordable units.

Disruptions to infrastructure not only affect day-to-day life but can significantly impact the viability and location of future affordable housing. Land that is affordable to develop may also be hazard-prone or underserved by resilient infrastructure, creating long-term equity concerns.

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## Evaluation of The City of Salem’s Current Fair Housing Legal Status

It is illegal to discriminate in the sale or rental of housing—including against individuals seeking a mortgage or housing assistance, or other housing-related activities. The Fair Housing Act prohibits discrimination because of race, color, national origin, religion, sex, familial status, and disability. A variety of other federal civil rights laws (e.g., Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act, the Americans with Disabilities Act) also prohibit discrimination in housing and community development programs and activities, particularly those assisted with HUD funding.

These civil rights laws require that federally funded housing providers take reasonable steps to ensure:

- Meaningful access to programs for persons with limited English proficiency (LEP).
- Effective communication for individuals with disabilities via appropriate auxiliary aids and services.

Local governments, Public Housing Authorities (PHA), States, and Insular Areas must be involved in fair housing planning to ensure follow-through on the obligation to affirmatively further the policies of the Fair Housing Act. These policies include ensuring that persons are not denied equal opportunities in connection with housing because of their race, color, national origin, religion, disability, sex, or familial status. They also include the policy of overcoming patterns of segregation and the patterns of denying access to opportunity that are a part of the nation’s history. To be effective, fair housing planning must tackle tough issues. Fair housing planning affects the community as a whole, so all people in the community must have the opportunity to be at the table and participate in making those decisions.

**Fair Housing Choice is not only about combating discrimination.** Fair housing choice involves individuals and families having the information, opportunity, and options to live where they choose without unlawful discrimination and other barriers related to race, color, religion, sex, familial status, national origin, age, marital status, and gender identity, and that their choices realistically include housing options in integrated areas with access to opportunity. It involves ensuring that individuals and families have:

1. **Actual Choice:** The existence of realistic housing options.
2. **Protected Choice:** Housing that can be accessed without discrimination.
3. **Enabled Choice:** Access to sufficient, accurate information so that choices are informed.

*Exceptions:*

The Fair Housing Act covers most housing. In very limited circumstances, the Act exempts certain properties, such as owner-occupied buildings with no more than four units, single-family houses sold or rented by the owner without an agent, and housing operated by religious organizations or private clubs that limit occupancy to members.

For persons with disabilities, fair housing choice includes:

- Access to accessible housing.
- Housing in the most integrated setting appropriate to an individual's need.

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## HUD – OFFICE OF FAIR HOUSING AND EQUAL OPPORTUNITY (FHEO)

HUD's Office of Fair Housing and Equal Opportunity (FHEO) works to eliminate housing discrimination, promote economic opportunity, and create diverse, inclusive communities. One of its roles is to investigate complaints of housing discrimination. FHEO enforces fair housing laws which include:

- The Fair Housing Act
- Title VI of the Civil Rights Act of 1964
- Section 109 of the Housing and Community Development Act of 1974
- Section 504 of the Rehabilitation Act of 1973
- Titles II and III of the Americans with Disabilities Act of 1990
- The Architectural Barriers Act of 1968
- The Age Discrimination Act of 1975
- Title IX of the Education Amendments Act of 1972
- Section 3 of the Housing and Urban Development Act of 1968

FHEO investigates complaints related to:

1. Discrimination under the Fair Housing Act (applicable to privately owned and operated housing).
  2. Discrimination and other civil rights violations in HUD-funded housing and community development programs.
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## A BRIEF OVERVIEW OF THE FAIR HOUSING ACT

The Fair Housing Act protects specified groups from discrimination in obtaining and maintaining housing. It applies to the rental or sale of dwelling units, with exceptions for:

- Single-family homes (if the owner does not own more than three single-family homes).
- Dwellings with up to four units where one is owner-occupied.

*Discrimination is prohibited based on:*

- Race
- Color
- Religion (with an exemption for religious organizations renting or selling to members of the same religion, as long as membership is not restricted based on race, color, or national origin)
- National origin
- Sex (including sexual orientation and gender identity) In February 2021, HUD released a memo stating that it would begin accepting discrimination complaints based on sexual orientation or gender identity and that FHEO would conduct “all other activities involving the application, interpretation, and enforcement of the Fair Housing Act’s prohibition on sex discrimination to include discrimination because of sexual orientation and gender identity.” HUD issued this guidance in response to the 2020 decision, *Bostock v. Clayton County*. The Supreme Court held that Title VII of the Civil Rights Act of 1964 barred employers from firing an individual for being gay or transgender. HUD’s guidance explains that “the Fair Housing Act’s sex discrimination provisions are comparable to those of Title VII and that they likewise prohibit discrimination because of sexual orientation and gender identity.” Further, courts have found discrimination based on sex to include sexual harassment, and HUD regulations outline quid pro quo and hostile environment sexual harassment that violates the Fair Housing Act. Discrimination based on nonconformity with gender stereotypes may also be unlawful sex-based discrimination under the Fair Housing Act.
- Familial status (parents or others with custody of children under 18). Familial status discrimination does not apply to housing dedicated to older persons in accordance with federal guidelines.
- Disability (including physical or mental impairments that substantially limit major life activities). The statute defines disability as having a physical or mental impairment that substantially limits one or more major life activities, having a record of such impairment, or being regarded as having such an impairment. Regulations provide lists of conditions that may constitute physical or mental impairments. \*Major life activities mean “functions such as caring for one’s self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working.”

The Fair Housing Act protects individuals in the covered classes from discrimination in various activities involving housing. Some of the specific types of activities that are prohibited include the following:



Prohibited activities include, but are not limited to:

- Refusing to rent or sell, refusing to negotiate for a rental or sale, or otherwise making a dwelling unavailable based on protected class.
- Discriminating in the terms, conditions, or privileges of sale or rental or in the services and facilities provided in connection with a sale or rental.
- Making, printing, or publishing notices, statements, or advertisements that indicate a preference, limitation, or discrimination in connection with a sale or rental based on a protected class.
- Representing that a dwelling is not available for inspection, sale, or rental based on a protected class.
- Inducing, for-profit, someone to sell or rent based on the representation that members of a protected class are moving to the neighborhood (sometimes referred to as blockbusting).
- Refusing to allow reasonable modifications or reasonable accommodations for persons with a disability. Reasonable modifications involve physical changes to the property, while reasonable accommodations involve changes in rules, policies, practices, or services to accommodate disabilities.
- Discriminating in “residential real estate related transactions,” including the provision of loans and selling, brokering, or appraising property.
- Retaliating (i.e., coercing, intimidating, threatening, or interfering) against anyone attempting to exercise rights under the Fair Housing Act.

In the sale and rental of housing, it is illegal to:

- Refuse to rent or sell housing
- Refuse to negotiate for housing
- Otherwise, make housing unavailable
- Set different terms, conditions, or privileges for sale or rental of a dwelling
- Provide a person different housing services or facilities
- Falsely deny that housing is available for inspection, sale, or rental
- Make, print, or publish any notice, statement, or advertisement with respect to the sale or rental of a dwelling that indicates any preference, limitation, or discrimination
- Impose different sales prices or rental charges for the sale or rental of a dwelling on different qualification criteria or applications, or sale or rental standards or procedures, such as income standards, application requirements, application fees, credit analyses, sale or rental approval procedures, or other requirements
- Evict a tenant or a tenant’s guest
- Harass a person
- Fail or delay performance of maintenance or repairs

- Limit privileges, services, or facilities of a dwelling
- Discourage the purchase or rental of a dwelling
- Assign a person to a particular building or neighborhood or section of a building or neighborhood
- For profit, persuade, or try to persuade, homeowners to sell their homes by suggesting that people of a particular protected characteristic are about to move into the neighborhood (blockbusting)
- Refuse to provide or discriminate in the terms or conditions of homeowners' insurance because of the race, color, religion, sex, disability, familial status, or national origin of the owner and/or occupants of a dwelling
- Deny access to or membership in any multiple listing service or real estate brokers' organization

The Fair Housing Act: HUD Oversight, Programs, and Activities” Congressional Research Service, April 7, 2021

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## **CIVIL RIGHTS OBLIGATIONS OF PUBLIC ENTITIES AND RECIPIENTS OF FEDERAL FINANCIAL ASSISTANCE**

Federal laws prohibit discrimination in housing and community development programs and activities because of race, color, religion, sex, national origin, familial status, and disability. These obligations extend to recipients of HUD financial assistance, including subrecipients, as well as the operations of state and local governments and their agencies, and certain private organizations operating housing and community development services, programs, or activities. For example, federal laws prohibit discrimination, including the denial of participation in and benefit of the following examples of programs and activities: homelessness, transitional housing, permanent supportive housing, the operations of social service organizations, public housing, voucher programs, other affordable housing programs, community development funded facilities, etc. Recipients and other covered entities must also take affirmative steps within such programs and activities to provide equal housing opportunities.

Examples of programs protected include those for:

- Homelessness
- Transitional housing
- Permanent supportive housing
- Social service organizations
- Public housing
- Voucher programs
- Other affordable housing programs
- Community development facilities

Recipients and other covered entities must take affirmative steps within such programs to provide equal housing opportunities.

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## AFFIRMATIVELY FURTHERING FAIR HOUSING

Title VIII of the Civil Rights Act of 1968, known as the **Fair Housing Act**, requires HUD and recipients of federal funds from HUD to affirmatively further the policies and purposes of the Fair Housing Act, also known as “affirmatively further fair housing” or “AFFH.” The obligation to affirmatively further fair housing requires recipients of HUD funds to take 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, which are:

- Race
- Color
- National origin
- Religion
- Sex (including sexual orientation and gender identity)
- Familial status
- Disability

Generally, in administering programs and activities relating to housing and community development, the federal government, HUD, and its recipients must:

- Determine who lacks access to opportunity and address any inequity among protected class groups
- Promote integration and reduce segregation
- Transform racially or ethnically concentrated areas of poverty into areas of opportunity

For much of the late 19th and early 20th century, government at all levels throughout the United States, along with private developers and mortgage lending institutions, played an active role in creating segregated living patterns and inequalities of opportunity. The federal government used the power of the military to remove Native Americans from their homelands, restricted federally insured mortgages on the basis of race and used "slum clearance" and "urban renewal" programs to demolish neighborhoods for infrastructure projects that largely benefitted white Americans at a significant cost to and perpetuated the segregation of Black communities, Indigenous communities, and other communities of color.

Private housing developers also used racially restrictive covenants that perpetuated segregation and restricted access to homeownership and other housing opportunities for communities of color, among many other forms of discrimination.

In 1967, following the “Long, Hot Summer of 1967,” which consisted of over 150 race-related riots, President Lyndon B. Johnson established the National Advisory Commission on Civil Disorders, also known as the Kerner Commission. The Commission was tasked with investigating the causes of the riots that occurred in cities like Los Angeles, Detroit, Chicago, Newark, Milwaukee, and New York City. The final report of the Commission, issued in 1968, pointed to a lack of economic opportunity, failed government programs, police brutality, and racism, among other causes. The Commission’s Report is famously known for its declaration that “Our nation is moving toward two societies, one black, one white—separate and unequal.”

In 1968, when Congress enacted the Fair Housing Act, one of the Act’s co-sponsors, Senator Walter F. Mondale, explained that “...the proposed law was designed to replace the ghettos by ‘truly integrated and balanced living patterns.’” Congress intended that HUD do more than simply not discriminate itself and intended for HUD to use its grant programs to assist in ending discrimination and segregation, to the point where the supply of genuinely open housing increases. As such, since 1968, the federal government recognized its role in creating segregated living patterns that continue to have negative impacts on health, education, and the economy and its responsibility to undo the effects of policies, practices, and procedures that result in a lack of equity.

As recently as 2015, the U.S. Supreme Court reaffirmed one purpose of the Fair Housing Act when it explained that “much progress remains to be made in our Nation’s continuing struggle against racial isolation...The Court acknowledges the Fair Housing Act’s continuing role in Moving the Nation toward a more integrated society.”

HUD and the federal government continue to work toward achieving the integrated and more balanced living patterns envisioned by the Fair Housing Act in 1968. In 2021, the White House issued a Memorandum to the Secretary of Housing and Urban Development, which declared that the affirmatively furthering fair housing provision in the Fair Housing Act, “...is not only a mandate to refrain from discrimination but a mandate to take actions that undo historic patterns of segregation and other types of discrimination and that afford access to long-denied opportunities.” The White House, in 2021, also issued a number of Executive Orders that implicate HUD’s responsibility for implementing the AFFH mandate, including Executive Order 13895, “Advancing Racial Equity for Underserved Communities Through the Federal Government” and Executive Order 13988, “Preventing and Combating Discrimination on the Basis of Gender Identity or Sexual Orientation.”

For decades, HUD has required recipients of federal financial assistance such as States, local governments, insular areas, and PHAs (program participants) to engage in fair housing planning.

Such planning has previously consisted of the Analysis of Impediments to Fair Housing Choice and the Assessment of Fair Housing and was done in connection with other types of planning required by program requirements, such as the Consolidated Plan, Annual Action Plan, and PHA plan.

HUD implements the AFFH mandate in other ways, such as through its collection of certifications from grantees, provisions regarding program design in its notices of funding opportunity (NOFOs), affirmative fair housing marketing and advertising requirements, and enforcement of site and neighborhood standards.

HUD's 2021 Interim Final Rule (IFR), **“Restoring Affirmatively Furthering Fair Housing Definitions and Certifications,”** requires program participants to submit certifications that they will affirmatively further fair housing in connection with their consolidated plans, annual action plans, and PHA plans. In order to support these certifications, the IFR creates a voluntary fair housing planning process for which HUD will provide technical assistance and support.

The IFR also rescinds the 2020 Preserving Communities and Neighborhood Choice rule, which was causing funding recipients to certify “compliance” with a regulatory definition that is not a reasonable construction of the Fair Housing Act's mandate to affirmatively further fair housing. HUD is putting itself and its program participants back in a position to take meaningful steps towards improved fair housing outcomes.

The IFR does not require program participants to undertake any specific type of fair housing planning to support their certifications and commits HUD to providing technical assistance to those that wish to undertake Assessments of Fair Housing (AFHs), Analyses of Impediments to Fair Housing Choice (AIs), or other forms of fair housing planning. HUD is providing resources to assist program participants.

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## DISABILITY

Federal nondiscrimination laws protect individuals with disabilities in most private housing, state and local government housing, public housing, and federally-assisted housing programs. The Fair Housing Act prohibits discrimination based on disability in housing and related transactions.

*Federal nondiscrimination laws define a person with a disability to include any;*

1. A physical or mental impairment that substantially limits one or more major life activities.
2. Having a record of such impairment.
3. Being regarded as having such an impairment.

*Examples of impairments include (but are not limited to):*

- Orthopedic, visual, speech, or hearing impairments
- Cerebral palsy, autism, epilepsy, muscular dystrophy, multiple sclerosis
- Cancer, heart disease, diabetes, HIV, developmental disabilities, mental illness
- Drug addiction or alcoholism, not including current users of illegal drugs

Some impairments are readily observable, while others may be invisible. Observable impairments may include, but are not limited to, blindness or low vision, deafness or being hard of hearing, mobility limitations, and other types of impairments with observable symptoms or effects, such as intellectual impairments (including some types of autism), neurological impairments (e.g., stroke, Parkinson’s disease, cerebral palsy, epilepsy, or brain injury), mental illness, or other diseases or conditions that affect major life activities or bodily functions.

The term “major life activities” includes those activities that are important to daily life. Major life activities include, for example, walking, speaking, hearing, seeing, breathing, working, learning, performing manual tasks, and caring for oneself. There are other major life activities that are not on this list. Major life activities also include the operation of major bodily activities, such as the functions of the immune system, special sense organs and skin, normal cell growth, and digestive, genitourinary, bowel, bladder, neurological, brain, respiratory, circulatory, cardiovascular, endocrine, hemic, lymphatic, musculoskeletal, and reproductive systems.

**Section 504 of the Rehabilitation Act** and *Titles II and III of the Americans with Disabilities Act (ADA)* further reinforce these protections in federally-assisted and public accommodations contexts. Section 504 of the Rehabilitation Act prohibits discrimination on the basis of disability in any program or activity receiving federal financial assistance. Titles II and III of the Americans with Disabilities Act prohibit discrimination on the basis of disability in all programs, services, and activities of public entities and by private entities that own, operate, or lease places of public accommodation.

Section 504 of the Rehabilitation Act provides that no qualified individual with disabilities should, solely by reason of their disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

Section 504 covers all programs and activities of recipients of HUD financial assistance, including, for example:

- Outreach and public contact, including contact with program applicants and participants
- Eligibility criteria
- Application process
- Admission to the program
- Tenancy, including eviction
- Service delivery
- Physical accessibility of facilities
- Employment policies and practice

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## THE AMERICANS WITH DISABILITIES ACT (ADA)

The ADA is a comprehensive civil rights law for persons with disabilities.

- **Title II (Public Entities):** Prohibits disability discrimination in programs, services, and activities provided by public entities (e.g., state and local governments, special districts) on the basis of disability in all programs, services, and activities provided or made available by public entities (state and local governments and special purpose districts). This includes housing when provided or made available by a public entity regardless of whether the entity receives federal financial assistance. For example, housing covered by Title II of the ADA includes housing operated by public housing agencies that meet the ADA's definition of "public entity," and housing operated by States or units of local government, such as housing on a State university campus.
- **Title III (Private Entities):** Prohibits discrimination in places of public accommodation and commercial facilities, requiring these spaces to be designed, constructed, and altered according to established accessibility standards. Title III of the ADA prohibits private entities that own, lease (to and from), and operate places of public accommodation from discriminating on the basis of disability and requires places of public accommodation and commercial facilities to be designed, constructed, and altered in compliance with established accessibility standards. Public accommodations at housing developments include public areas open to the general public, such as a rental office. Public accommodations would also include, for example, shelters and social service establishments.

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## SEXUAL HARASSMENT

Sexual harassment in housing is a form of sex discrimination prohibited by the Fair Housing Act and other federal laws (e.g., Section 109 of the Housing and Community Development Act of 1974, Title IX of Education Amendments of 1972).

There are two main types of sexual harassment:

- Quid pro quo sexual harassment
  - Hostile environment sexual harassment
1. **Quid Pro Quo Harassment:** Quid pro quo harassment occurs when a housing provider requires a person to submit to an unwelcome request to engage in sexual conduct as a condition of obtaining or maintaining housing or housing-related services.

2. **Hostile Environment Harassment** occurs when severe or pervasive unwelcome sexual conduct interferes with housing opportunities or terms. It occurs when a housing provider subjects a person to severe or pervasive unwelcome sexual conduct that interferes with the sale, rental, availability, terms, conditions, or privileges of housing or housing-related services, including financing.

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## REASONABLE ACCOMMODATIONS AND MODIFICATIONS

### Rights and Obligations Under Federal Law

Various federal laws require housing providers to make reasonable accommodations and reasonable modifications for individuals with disabilities. Federal nondiscrimination laws that protect against disability discrimination cover not only tenants and home seekers with disabilities, but also buyers and renters without disabilities who live or are associated with individuals with disabilities. These laws also prohibit housing providers from refusing residency to persons with disabilities, or placing conditions on their residency, because they require reasonable accommodations or modifications.

This protection covers both tenants/home seekers with disabilities and those associated with them.

### The Fair Housing Act

- **Reasonable Accommodation:** A change, exception, or adjustment to a rule, policy, practice, or service to allow a person with a disability equal use and enjoyment of a dwelling and common areas.
- **Reasonable Modification:** A structural change to an existing premise (at the expense of the person with the disability, unless it would cause an undue burden) necessary for full enjoyment of the premises.

In addition, the Fair Housing Act prohibits a housing provider from refusing to permit, at the expense of the person with a disability, reasonable modifications of existing premises occupied or to be occupied by such person if such modifications may be necessary to afford such person full enjoyment of the premises.

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### Section 504

Unlike the Fair Housing Act, Section 504 does not distinguish between reasonable accommodations and reasonable modifications. Instead, both are captured by the term “reasonable accommodations”. Under Section 504, the requirement to make reasonable accommodations applies to any changes that may be necessary to provide equal opportunity to participate in any federally-assisted program or activity. This includes a change, adaptation or modification to a policy, program, service, facility, or workplace which will allow a qualified person with a disability to participate fully in a program, take advantage of a service, live in housing, or perform a job.



Reasonable accommodations also includes any structural changes that may be necessary. Reasonable accommodations may include changes which may be necessary in order for the person with a disability to use and enjoy a dwelling, including public and common use spaces, or participate in the federally-assisted program or activity. Under Section 504, reasonable accommodations must be provided and paid for by the housing provider unless providing them would be an undue financial and administrative burden or a fundamental alteration of the program. In such cases, the provider is still required to provide any other reasonable accommodation up to the point that would not result in an undue financial and administrative burden on the particular recipient and/or constitute a fundamental alteration of the program. In addition to the statutory requirement to make reasonable accommodations under Section 504, HUD's Section 504 regulation provides for making "housing adjustments" at 24 C.F.R. § 8.33.

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## **The Americans with Disabilities Act (ADA)**

Similar to and based upon the Section 504 reasonable accommodation requirement, Titles II and III of the ADA require public entities and public accommodations to make reasonable modifications to policies, practices, or procedures to avoid discrimination. This obligation applies unless the public entity can demonstrate that the modifications would fundamentally alter the nature of its service, program, or activity (Title II), or the public accommodation can demonstrate that making the modifications would fundamentally alter the nature of the goods, services, facilities, privileges, advantages, or accommodations (Title III).

*Housing providers may not impose extra fees, deposits, or special conditions on individuals receiving these accommodations.*

Providers may request only the necessary information to evaluate a request; if a disability is obvious or known, additional information should not be required.

A denial of a reasonable accommodation or modification must be accompanied by a discussion of possible alternatives that address the disability-related need without imposing an undue burden on the provider.

## **Reasonable Accommodations**

A reasonable accommodation is a change, exception, or adjustment to a rule, policy, practice, or service that may be necessary for a person with disabilities to have an equal opportunity to use and enjoy a dwelling, including public and common use spaces, or to fulfill their program obligations. Please note that the ADA often refers to these types of accommodations as “modifications.”

Any change in the way things are customarily done that enables a person with disabilities to enjoy housing opportunities or to meet program requirements is a reasonable accommodation. In other words, reasonable accommodations eliminate barriers that prevent persons with disabilities from fully participating in housing opportunities, including both private housing and in federally-assisted programs or activities. Housing providers may not require persons with disabilities to pay extra fees or deposits or place any other special conditions or requirements as a condition of receiving a reasonable accommodation.

Since rules, policies, practices, and services may have a different effect on persons with disabilities than on other persons, treating persons with disabilities exactly the same as others will sometimes deny persons with disabilities an equal opportunity to enjoy a dwelling or participate in the program. Not all persons with disabilities will have a need to request a reasonable accommodation. However, all persons with disabilities have a right to request or be provided a reasonable accommodation at any time.

Under Section 504 and the ADA, public housing agencies, other federally-assisted housing providers, and state or local government entities are required to provide and pay for structural modifications as reasonable accommodations/modifications.

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## **Reasonable Modifications**

Under the Fair Housing Act, a reasonable modification is a structural change made to existing premises, occupied or to be occupied by a person with a disability, in order to afford such person full enjoyment of the premises. Reasonable modifications can include structural changes to interiors and exteriors of dwellings and to common and public use areas. Examples include the installation of a ramp into a building, lowering the entry threshold of a unit, or the installation of grab bars in a bathroom. Under the Fair Housing Act, prohibited discrimination includes a refusal to permit, at the expense of the person with a disability, reasonable modifications of existing premises occupied or to be occupied by such person if such modifications may be necessary to afford such person full enjoyment of the premises.

Under Section 504, a housing provider is required to provide and pay for the structural modification as a reasonable accommodation unless it amounts to an undue financial and administrative burden or a fundamental alteration of the program. If an undue burden or fundamental alteration exists, the recipient is still required to provide any other reasonable accommodation up to the point that would not result in an undue financial and administrative burden on the particular recipient and/or constitute a fundamental alteration of the program.

Examples include:

- Assigning an accessible parking space for a person with a mobility impairment
- Permitting a tenant to transfer to a ground-floor unit
- Adjusting a rent payment schedule to accommodate when an individual receives income assistance
- Adding a grab bar to a tenant's bathroom
- Permitting an applicant to submit a housing application via a different means
- Permitting an assistance animal in a "no pets" building for a person who is deaf, blind, has seizures, or has a mental disability.

The requirement to provide reasonable accommodations and modifications applies to, but is not limited to individuals, corporations, associations and others involved in the provision of housing or residential lending,

including property owners, housing managers, homeowners and condominium associations, lenders, real estate agents, and brokerage services. This also applies to state and local governments, including in the context of exclusionary zoning or other land- use decisions.

A provider is entitled to obtain information that is necessary to evaluate if a requested reasonable accommodation or modification may be necessary because of a disability. If a person's disability is obvious, readily apparent, or otherwise known to the provider, and if the need for the requested accommodation or modification is also readily apparent or known, then the provider may not request any additional information. If the disability and/or the disability- related need for the requested accommodation or modification is not known or obvious, the provider may request only information that is necessary to evaluate the disability and/or disability-related need for the accommodation. This information may be from the requesting individual, medical professional, a peer support group, a non-medical service agency, or a reliable third party who is in a position to know about the individual's disability. In most cases, an individual's medical records or detailed information about the nature of a person's disability is not necessary for this inquiry and may be inappropriate.

A housing provider can deny a request for a reasonable accommodation or modification if the request was not made by or on behalf of a person with a disability or if there is insufficient verification of a disability related need. In addition, a request for a reasonable accommodation or modification may be denied if providing the accommodation or modification would impose an undue financial and administrative burden on the housing provider or it would fundamentally alter the nature of the housing provider's program. The determination of undue financial and administrative burden must be made on a case-by-case basis involving various factors. If an undue burden or fundamental alteration exists, the housing provider is still required to provide any other reasonable accommodation up to the point that would not result in an undue financial and administrative burden on the particular housing provider and/or constitute a fundamental alteration of the program.

When a housing provider denies a requested accommodation or modification, the provider should discuss with the requester whether there is an alternative accommodation or modification that would effectively address the requester's disability-related needs without a fundamental alteration to the provider's operations and without imposing an undue financial and administrative burden. As part of this interactive process, the housing provider should recognize that the individual requesting the accommodation or modification is most familiar with his or her disability and is in the best position to determine what type of aid or service will be effective to meet a disability-related need. These discussions often result in an effective accommodation or modification for the requester that does not pose an undue financial and administrative burden for the provider.

A provider has an obligation to provide prompt responses to reasonable accommodation requests. An undue delay in responding to a reasonable accommodation request may be deemed to be a failure to provide a reasonable accommodation. A failure to reach an agreement on an accommodation request is in effect a decision by the provider not to grant the requested accommodation.

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## LIMITED ENGLISH PROFICIENCY

For persons who, as a result of national origin, do not speak English as their primary language and who have a limited ability to speak, read, write, or understand English. For purposes of Title VI and the Limited English Proficient (LEP) Guidance, persons may be entitled to language assistance with respect to a particular service, benefit, or encounter.

**Title VI of the Civil Rights Act of 1964** is the federal law that protects individuals from discrimination on the basis of their race, color, or national origin in programs that receive federal financial assistance. In certain situations, failure to ensure that persons who are LEP can effectively participate in, or benefit from, federally assisted programs may violate Title VI's prohibition against national origin discrimination.

**EO 13166**, signed on August 11, 2000, directs all federal agencies, including the Department of Housing and Urban Development (HUD), to work to ensure that programs receiving federal financial assistance provide meaningful access to LEP persons. Pursuant to EO 13166, the meaningful access requirement of the Title VI regulations and the four-factor analysis set forth in the Department of Justice (DOJ) LEP Guidance apply to the programs and activities of federal agencies, including HUD. In addition, EO 13166 requires federal agencies to issue LEP Guidance to assist their federally assisted recipients in providing such meaningful access to their programs. This Guidance must be consistent with the DOJ Guidance. Each federal agency is required to specifically tailor the general standards established in DOJ's Guidance to its federally assisted recipients. On December 19, 2003, HUD published such proposed Guidance.

Federally assisted recipients are required to make reasonable efforts to provide language assistance to ensure meaningful access for LEP persons to the recipient's programs and activities.

To do this, the recipient should:

- (1) Conduct the four-factor analysis;
- (2) Develop a Language Access Plan (LAP); and
- (3) Provide appropriate language assistance.

The actions that the recipient may be expected to take to meet its LEP obligations depend upon the results of the four-factor analysis including the services the recipient offers, the community the recipient serves, the resources the recipient possesses, and the costs of various language service options. All organizations would ensure nondiscrimination by taking reasonable steps to ensure meaningful access for persons who are LEP. HUD recognizes that some projects' budgets and resources are constrained by contracts and agreements with

HUD. These constraints may impose a material burden upon the projects. Where a HUD recipient can demonstrate such a material burden, HUD views this as a critical item in the consideration of costs in the four-factor analysis. However, refusing to serve LEP persons or not adequately serving or delaying services to LEP persons would violate Title VI. The agency may, for example, have a contract with another organization to supply an interpreter when needed; use a telephone service line interpreter; or, if it would not impose an undue burden, or delay or deny meaningful access to the client, the agency may seek the assistance of another agency in the same community with bilingual staff to help provide oral interpretation service.

If a person believes that a HUD federally assisted recipient is not taking reasonable steps to ensure meaningful access to LEP persons, that individual may file a complaint with HUD's local Office of Fair Housing and Equal Opportunity (FHEO).

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## **ACTIONS FOR A VIOLATION**

### **Housing Discrimination Complaints**

Complaints related to housing discrimination in Oregon are generally filed with:

- HUD's Office of Fair Housing and Equal Opportunity (FHEO).
- The Housing and Civil Enforcement Section of the U.S. Department of Justice.

#### **Housing Discrimination Complaints filed with State and Federal Organizations**

Formal complaints related to housing discrimination in the State of Oregon are generally filed with HUD's Office of Fair Housing and Equal Opportunity (FHEO), the Housing and Civil Enforcement Section of the United States Department of Justice.

A party who believes they have been a victim of illegal discrimination, based on their membership in one of the federally protected classes, during a housing related transaction, may file a complaint with the Department of Housing and Urban Development (HUD). When a complaint is filed, HUD will investigate the complaint and try to conciliate the matter with both parties. FHEO administers and enforces federal laws and establishes policies that ensure all Americans have equal access to the housing of their choice.

In addition to general fair housing discrimination complaints, HUD accepts specific complaints that violate Section 504 of the Rehabilitation Act of 1973, prohibiting programs or organizations that receive federal funds from discriminating against persons with disabilities. In relation to housing, this means that any housing program that accepts federal funds must promote equal access of units, regardless of disability status. Both mental and physical disability are included in Section 504.

An example of a Section 504 violation is a public housing manager who demands a higher housing deposit to a person in a wheelchair because of the anticipated damage that a wheelchair may cause. This violates Section 504 in that a person cannot be held to different standards or liabilities due to disability.

Complaints that are in violation of Section 504 are filed and processed in the same manner as general fair housing complaints.

The Housing and Civil Enforcement Section of the Department of Justice works to protect some of the most fundamental rights of individuals, including the right to access housing free from discrimination, the right to access credit on an equal basis, the right to patronize places of business that provide public accommodations, and the right to practice one's faith free from discrimination.

If you believe you have been discriminated against in a housing transaction, you may file a complaint with HUD. Upon filing, HUD investigates and attempts conciliation between the parties. FHEO administers and enforces federal laws and directs complaints to state or local agencies as applicable. Specific complaints under Section 504 (disability discrimination) are processed similarly.

### **HUD – Multifamily Housing Complaint Line**

The Multifamily Housing Complaint Line is a service for residents of HUD-insured/assisted properties and community members to report management-related issues such as:

- Poor maintenance
- Health and safety dangers
- Mismanagement
- Fraud

Dial **1-800-MULTI-70 (1-800-685-8470)** to speak with specialists (available in English and Spanish). They can assist with reporting issues, answer questions regarding residents' rights, and refer to local agencies if needed. The Multifamily Housing Complaint Line is a service provided by HUD's Multifamily Housing Clearinghouse (MFHC) that enables residents of HUD-insured and -assisted properties and other community members to report complaints with a property's management concerning matters such as poor maintenance, dangers to health and safety, mismanagement, and fraud. It can be accessed by dialing 1-800-MULTI-70 (1-800-685-8470).

Callers to this line can speak to MFHC information specialists in English and Spanish, who will help them resolve their problem. MFHC staff explain how to report problems to building management more effectively, answer questions about residents' rights, and refer callers to local Public Housing Agencies and other organizations, if

needed. If a complaint is serious enough to bring to HUD's attention, MFHC information specialists write up a report on the problem and fax or email it to the appropriate HUD Field Office for action.

The Multifamily Housing Complaint Line supports HUD's enforcement efforts by empowering tenants and community residents to act as HUD's eyes and ears to ensure safe, decent, and sanitary housing.

Complaints of housing discrimination are handled by the Office of Fair Housing and Equal Opportunity.

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## **FAIR HOUSING ASSISTANCE PROGRAM (FHAP)**

FHAP provides HUD funding to state and local agencies that administer fair housing laws deemed substantially equivalent to the Fair Housing Act.

- Agencies apply for certification.
- Once certified, HUD refers housing discrimination complaints to these agencies.

Through the Fair Housing Assistance Program (FHAP), HUD funds state and local agencies that administer fair housing laws that HUD has determined to be substantially equivalent to the Fair Housing Act.

The Fair Housing Act contemplates that, across the country, state and local governments will enact and enforce their own statutes and ordinances that are substantially equivalent to the Fair Housing Act. HUD provides FHAP funding annually on a noncompetitive basis to state and local agencies that administer fair housing laws that provide rights and remedies that are substantially equivalent to those provided by the Fair Housing Act.

A state or local agency may be certified as substantially equivalent after it applies for certification. HUD then determines that the agency administers a law that provides substantive rights, procedures, remedies, and judicial review provisions that are substantially equivalent to the Fair Housing Act. Typically, once certified, HUD will refer complaints of housing discrimination that it receives to the state or local agency for investigation.

FHAP is an intergovernmental enforcement partnership between HUD and the state or local agencies. As in any partnership, both parties must contribute to the success of the program.

While HUD provides significant resources to Substantially Equivalent Agencies in the form of training, technical assistance, and funding, the agencies must demonstrate a commitment to thorough and professional complaint processing. This includes all phases of complaint processing, from accurate identification of issues at intake,

through complete and sound investigations, to following through on administrative or judicial enforcement to ensure that victims of unlawful housing discrimination obtain full remedies and the public interest is served. The agencies should also work to develop relationships with public, private, and non-profit organizations in a grassroots approach to making fair and open housing a reality.

The Fair Housing Act covers most housing. In very limited circumstances, the Act exempts owner-occupied buildings with no more than four units, single-family houses sold or rented by the owner without the use of an agent, and housing operated by religious organizations and private clubs that limit occupancy to members.

***Oregon is one of only a handful of states that do not currently have a FHAP.***

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## **FAIR HOUSING INITIATIVES PROGRAM (FHIP)**

Fair housing organizations and other non-profits that receive funding through the Fair Housing Initiatives Program (FHIP) assist people who believe they have been victims of housing discrimination.

FHIP organizations partner with HUD to help people identify government agencies that handle complaints of housing discrimination. They also conduct preliminary claims investigations, including sending "testers" to properties suspected of practicing housing discrimination. In addition to funding organizations that provide direct assistance to individuals who feel they have been discriminated against while attempting to purchase or rent housing, FHIP also has initiatives that promote fair housing laws and equal housing opportunity awareness.

The U.S. Department of Housing and Urban Development (HUD) provides Fair Housing Assistance Program (FHAP) funding annually on a noncompetitive basis to state and local agencies that enforce fair housing laws that HUD determined to be substantially equivalent to the Fair Housing Act. A state or local agency may be certified as substantially equivalent after it applies for certification and HUD determines that the agency administers a law that provides substantive rights, procedures, remedies and judicial review provisions that are substantially equivalent to the Fair Housing Act. Typically, once certified, HUD will refer complaints of housing discrimination that it receives to the state or local agency for investigation. Oregon is one of only a handful of states that currently does not have a FHAP provider. The Fair Housing Council of Oregon (FCHO) provides resources and support for fair housing complaints for residents in Salem. The Fair Housing Council of Oregon (FHCO) is the designated FHIP.

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## **Fair Housing Council of Oregon**



1221 SW Yamhill St, Suite 305  
Portland, OR 97205  
Phone: (503) 223-8197  
Email: [information@fhco.org](mailto:information@fhco.org) or [enforcement@fhco.org](mailto:enforcement@fhco.org)

The Fair Housing Council of Oregon (FHCO) is a statewide civil rights organization who proactively promotes housing justice through inclusive housing education and enforcement for all persons without regard to race, color, sex, religion, national origin, familial status, sexual orientation, gender identity, a source of income, or disability. The FHCO's mission is to end illegal housing discrimination and promote equal access to housing choice through education and enforcement of fair housing law.

By aiding victims of illegal housing discrimination, FHCO can provide justice to Oregonians and access to education about their rights under fair housing law. **FHCO administers fair housing testing if an organization is suspected of denying housing to protected classes.**

#### The FHCO:

- Provides information and education services to renters, homebuyers, landlords, community organizations, and lending institutions.
- Monitors fair housing compliance of housing providers, lending institutions, and local and state governments.
- Engages in enforcement activities which include investigation, testing, and complaint filing with State or Federal authorities.
- Negotiates fair housing settlements by mediation, conciliation, or litigation, if necessary.

#### Overview of Fair Housing Trends and Initiatives

The Fair Housing Council of Oregon (FHCO) has observed several persistent and emerging trends in discriminatory housing practices across Salem. The most commonly reported basis for discrimination continues to be **disability**—both physical and mental. Additionally, FHCO has seen increasing complaints related to **familial status**, often tied to multi-generational households, and **national origin**, particularly among Hispanic/Latino communities, which make up a larger share of Salem's population compared to the statewide average. **Source of Income** discrimination remains prevalent statewide.

Anecdotal evidence indicates that some landlords exhibit hostility toward extended family living arrangements, a practice more common among immigrant households. These issues often intersect, as landlords may simultaneously discriminate based on **family size**, **language**, or **perceived nationality**. While public housing authorities across Oregon have been criticized for failing to meet accommodation obligations, FHCO notes that

these issues have not yet surfaced significantly within the **Salem Housing Authority**—though they caution that this may be an emerging statewide concern.

FHCO has conducted limited fair housing testing in Salem—eight tests since 2020—focused on **disability, race, national origin, and familial status**. No definitive findings of discrimination were reported from these tests, though testing capacity has been significantly constrained due to federal funding cuts. FHCO has expressed interest in future local partnerships to expand testing coverage.

**Complaint Data: 2018–2023**

Over the past five years, FHCO received **490 contacts from Salem residents**, of which **185 were actual fair housing allegations**. The breakdown of those 185 allegations by protected class is as follows:

Protected Class	Number of Allegations
Disability	129
Race or Color	18
National Origin	16
Familial Status	14
Sex	24
Gender Identity / Sexual Orientation	8

*Note: Some complaints cited multiple bases for discrimination.*

Outcomes of the 185 fair housing allegations:

- **95** cases received further investigation
- **66** were closed due to insufficient evidence or lost contact with the complainant
- **16** were resolved through direct advocacy
- **3** were resolved by the complainant before action was taken
- **7** were referred to legal services
- **3** resulted in administrative complaints, two of which are still pending (filed post-July 2024)

Additionally, **46 individuals** who contacted FHCO identified as using **Housing Choice Vouchers or other subsidies**, indicating concerns around source of income discrimination, though not all led to formal complaints.

**Education, Training, and Community Partnerships**

While FHCO has not detailed specific trainings in this response, they referenced working closely with **Legal Aid / Oregon Law Center** and are actively building relationships with **culturally specific organizations** such as the **NAACP, Casa Latinos Unidos**, and others. Their education and outreach teams are working to expand landlord training and tenant awareness in underserved communities.

## Key Issues Impacting Protected Classes in Salem

- **Disability Discrimination** remains the most frequent basis for fair housing complaints, particularly related to reasonable accommodations and access issues.
- **National Origin and Familial Status Discrimination** are emerging concerns, particularly related to cultural housing patterns and language access.
- **Hispanic/Latino Households**, which are overrepresented in Salem relative to the rest of Oregon, face elevated risks of discriminatory treatment related to multigenerational living and linguistic profiling.
- **Limited Local Testing** restricts proactive enforcement and monitoring of discriminatory behavior.
- **Housing Voucher Discrimination**, while not always formally categorized, is a consistent concern among voucher users in the jurisdiction.

## Fair Housing Education and Outreach Activities in Salem

Between 2020 and 2025, more than 25 fair housing education, training, and outreach events were conducted in Salem to raise awareness of fair housing rights and responsibilities. These efforts were aimed at a wide range of audiences—including housing providers, landlords, property managers, legal advocates, nonprofit service providers, public officials, and members of the general public. Events were conducted both in-person and virtually and covered a variety of issues including reasonable accommodations, Affirmatively Furthering Fair Housing (AFFH), hoarding, disability rights, and landlord/tenant responsibilities.

## Key Takeaways

**Diverse Audiences Reached:** The events targeted multiple stakeholder groups:

- **Housing Providers and Landlords:** Including the Salem Rental Housing Association, YMCA Board of Directors, and property management firms.
- **Advocates and Social Service Providers:** Including Legal Aid Services of Oregon, Project ABLE, Family Promise, and Mid-Willamette Valley Community Action Agency.
- **Culturally Specific and Immigrant-Focused Groups:** Events reached Micronesian Islander Community (MIC), Salem for Refugees, and other immigrant-serving organizations.
- **General Public and Specialized Populations:** Events such as those hosted by Oregon Educators Association, East Salem Rotary, and healthcare partners included outreach to broader audiences.

**Focus Areas Included:**

- Discrimination awareness and legal remedies
- Reasonable accommodation and accessibility in housing
- Housing choice vouchers and source of income protections
- Educational materials tailored to seniors, people with disabilities, and immigrant communities

**Event Formats:** Events were delivered in various formats to maximize accessibility, including:

- Face-to-face trainings and meetings
- Zoom webinars and videoconference briefings
- Stakeholder roundtables and collaborative forums

**Summary Table: Outreach Scope (2020–2025)**

Event Focus Area	Examples of Host Organizations	Primary Audience
Fair housing for landlords & PMs	Salem Rental Housing Association, YMCA Board, Evolve PM	Landlords / Property Managers
Disability rights & accommodations	Project ABLE, Northwest Senior & Disability Services, ROCC	Consumers / Advocates
Family, DV, and refugee services	Grace House, Family Promise, Salem for Refugees	Advocates / General Public
Culturally specific outreach	Micronesian Islander Community, Casa Latinos Unidos, NAACP	Immigrants / Advocates
Legal and policy education	Legal Aid Services, Marion County Public Defenders, Willamette Health Council	Legal / Social Service Providers
AFFH and public-sector training	Salem Housing Authority, CDBG Recipients, Salem Open Trainings	Public Sector / Housing Authorities

These outreach efforts reflect a sustained commitment to advancing fair housing education, building awareness among stakeholders, and reaching vulnerable communities. Ongoing coordination between city staff, FHCO, nonprofit partners, and culturally specific organizations is essential to ensure inclusive, effective fair housing strategies across Salem. The table above is a summary of events, not an exhaustive list.

**The Fair Housing Council of Oregon is the designated FHIP provider for Salem, Oregon.**

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## Identification of Impediments to Fair Housing Choice

The AI is a comprehensive review of a jurisdiction's laws, regulations, and administrative policies, procedures, and practices affecting the location, availability, and accessibility of housing, as well as an assessment of conditions, both public and private, affecting fair housing choice.

The AI is a review of impediments to fair housing choice in the public and private sector.

Impediments to fair housing choice are any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choices or the availability of housing choices, or any actions, omissions, or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin. Policies, practices, or procedures that appear neutral on their face but operate to deny or adversely affect the housing provision to persons of a particular race, color, religion, sex, disability, familial status, or national origin may constitute such impediments.

Impediments include actions or omissions in the jurisdiction's public or private housing sector that:

- Constitute violations, or potential violations, of the Fair Housing Act
- Are counterproductive to fair housing choice, such as NIMBYism:
  - Community resistance when minorities, persons with disabilities, and/or low-income persons first move into White and/or moderate- to high-income areas
  - Community resistance to the siting of housing facilities for people with disabilities in residential neighborhoods based on their disabilities
  - Have the effect of restricting housing opportunities on the basis of race, color, religion, sex, disability, familial status, or national origin.

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## Public Sector

### Zoning and Site Selection

Local government policies that limit or exclude housing facilities for persons with disabilities or other housing for homeless people from certain residential areas may violate the provisions of the Fair Housing Act. This is because they may indirectly discriminate against persons with disabilities and minorities, many of whom are homeless. Building codes that require certain amenities or setbacks also affect the feasibility of providing low- and moderate-income housing development.

Even where zoning or other government policies are permissive, neighborhood residents often resist the placement of certain types of housing in their area. The attitude of local government officials, public pronouncements of general policy, and careful planning and implementation of individual housing efforts by providers are key aspects for overcoming resistance of this kind.

Placement of new or rehabilitated housing for lower-income people is one of the most controversial issues communities face. If fair housing objectives are to be achieved, the goal must be to avoid high concentrations of low-income housing.

Whether the persons to be served are families with children, persons with disabilities, homeless persons, or lower-income minorities, many communities feel strongly that housing for these persons should be provided but “not in my back yard” (NIMBY). This attitude seriously affects the availability of housing for people in these groups and is one of the most difficult challenges jurisdictions encounter in promoting fair housing objectives.

HUD has regulations governing the selection of sites for certain HUD-assisted housing programs. These regulations are flexible and express the goal previously stated. Jurisdictions should strive to meet the intent and spirit of these regulations in providing or approving sites for all of the low- and moderate-income housing developed in the community.

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## **Housing Alliance and Community Partnerships (HACP)**

Public housing was established to provide decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities. Public housing comes in all sizes and types, from scattered single-family houses to high-rise apartments for elderly families.

U.S. Department of Housing and Urban Development (HUD) administers Federal aid to Housing Alliance and Community Partnerships (HACP), the City’s Housing Authority, to help manage the housing for low-income residents at rents they can afford.

Public housing is limited to low-income families and individuals. HACP determines eligibility based on: 1) annual gross income; 2) whether you qualify as elderly, a person with a disability, or as a family; and 3) U.S. citizenship or eligible immigration status.

Rent, referred to as the Total Tenant Payment (TTP) in this program, is based on a family's anticipated gross annual income less deductions, if any. HUD regulations allow HACP to exclude from annual income the following allowances: \$480 for each dependent; \$400 for any elderly family or a person with a disability; and some medical deductions for families headed by an elderly person or a person with disabilities. HACP determines if any allowable deductions should be subtracted from the client’s annual income based on the application. Annual income is the anticipated total income from all sources received from the family head and spouse, and each additional member of the family 18 years of age or older.

The formula used in determining the TTP is the highest of the following, rounded to the nearest dollar:

1. 30 percent of the monthly adjusted income. (Monthly Adjusted Income is annual income less deductions allowed by the regulations);
2. 10 percent of monthly income;
3. welfare rent, if applicable; or
4. a \$25 minimum rent or higher amount (up to \$50) set by a housing authority.

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## Housing Choice Vouchers

Section 8 vouchers can be an extremely effective tool in reducing concentrations of low-income households. This was the intent of the voucher choice program when it was introduced in 1974. Sometimes voucher holders are discriminated against by landlords who are unwilling to accept Section 8 vouchers. Source of income is a protected class in Oregon

Consequently, voucher holders must be located where rental housing is available. The voucher holder's rental options are limited, in most cases, to rental units priced at or below Fair Market Rent.

The housing choice voucher program is the federal government's major program for assisting very low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market. Since housing assistance is provided on behalf of the family or individual, participants can find their own housing, including single-family homes, townhouses, and apartments.

The participant is free to choose any housing that meets the program's requirements and is not limited to units located in subsidized housing projects.

A family issued a housing voucher is responsible for finding a suitable housing unit of the family's choice where the owner agrees to rent under the program. This unit may include the family's present residence. Rental units must meet minimum health and safety standards, as determined by the Salem Housing Authority.

A housing subsidy is paid to the landlord directly by the HACP on behalf of the participating family. The family then pays the difference between the actual rent charged by the landlord and the amount subsidized by the program. Under certain circumstances, if authorized by the HACP, a family may use its voucher to purchase a modest home.

Since the demand for housing assistance often exceeds the limited resources available to HUD and the local housing agencies, long waiting periods are common. A PHA may close its waiting list when it has more families on the list than can be assisted in the near future.

PHAs may establish local preferences for selecting applicants from their waiting list.

For example, PHAs may give a preference to a family who is (1) homeless or living in substandard housing, (2) paying more than 50% of its income for rent, or (3) involuntarily displaced. Families who qualify for such local preferences move ahead of other families on the list who do not qualify for any preference. Each PHA has the discretion to establish local preferences to reflect its particular community's housing needs and priorities.

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## **Sale of Subsidized Housing and Possible Displacement**

In the sale of subsidized housing, the objective should be to preserve lower-income housing opportunities to the maximum extent feasible. However, suppose any displacement of a current minority or disabled low-income families occurs. In that case, the objective should be to provide other housing opportunities to displaced households by giving them a real choice to relocate inside and outside minority neighborhoods or in buildings predominantly occupied by minorities or persons with disabilities. Because a relocation plan often places sole reliance on the provision of certificates or vouchers to displaced households, a program to promote real choice in the use of certificates and vouchers is essential.

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## **Private Sector**

Under the broad term “private sector” are many specific aspects of the jurisdiction’s housing market that should be examined to determine whether fair housing objectives are being served. Government policies and procedures that regulate, monitor, or otherwise impact rental, sales, and property insurance practices can play a significant role in promoting fair housing choice.

## **Lending Policies and Practices**

Until very recently, mortgage lending and real estate appraisal policies and practices were openly discriminatory. Decisions regarding property values, lending criteria, and related factors frequently rested on the race or ethnicity of the applicant and the racial or ethnic identity of the neighborhood in which the subject property was located. Lending policies and practices also treated applicants differently based on gender. Because of the close relationship between mortgage lending and appraisal activities, the policies and practices in one area significantly impact those in the other area.

Appraisal and lending criteria that look at age, size, or minimum value of a dwelling in light of “stability” factors—such as whether the neighborhood is homogeneous or changing culturally or socially—may be more recent iterations of previous policies and criteria that referred openly to neighborhood stability or change in terms of racial characteristics. Unintentional or inadvertent discrimination may result from applying these criteria or various other factors, some of which may be very difficult or impossible to detect in a fair housing review by a regulatory or other agency.

Lending policies and requirements related to credit history, current credit rating, employment history, and general character of applicants enable lenders to use a great deal of discretion and in the process deny loans even though the prospective borrower would have been an acceptable risk. In October 1992, the Federal Reserve Bank of Boston released a study of 131 Boston area lenders that showed that the subjectivity built into the loan process is a principal cause of discrimination in lending.

The study is based on the review of 3,062 loan applications. The study concluded that, after controlling for all objective indicators of applicant risk, lenders still rejected members of minority groups 56 percent more often than otherwise identical White applicants. For Whites, “compensating factors” are considered that result in loan approval at a much higher rate than for Blacks or Hispanics.



Studies such as this point to the need for affirmative action by lenders themselves to look at their policies and practices and change the manner in which judgments are made by every person who plays a role in the lending process.

Lenders may apply different terms for different applicants or dwellings in different neighborhoods. Frequently, the terms offered to Blacks or other minority borrowers have been less favorable than those offered to nonminority borrowers. Part of this issue is that the less favorable terms have been the only terms available for the dwellings minority borrowers plan to purchase or in the neighborhoods where they reside or the dwellings they plan to purchase. Often, the limited lending options available in such neighborhoods have been offered by lenders who operate only in such areas.

Because some banks or savings and loan institutions in cities will not make loans in minority neighborhoods, minority borrowers cannot benefit from competitive loan offerings available in the larger market.

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## **Home Mortgage Disclosure Act**

The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975 and is implemented by the Federal Reserve Board's Regulation C. The Act was implemented in response to mortgage credit shortages in older urban neighborhoods (particularly those with predominantly minority populations).

On July 21, 2011, the rule-writing authority of Regulation C was transferred to the Consumer Financial Protection Bureau (CFPB). This regulation provides the public loan data that can be used to assist:

- In determining whether financial institutions are serving the housing needs of their communities;
- public officials in distributing public-sector investments to attract private investment to areas where it is needed;
- and in identifying possible discriminatory lending patterns.

The Fair Housing Act applies to mortgage lending just as it does to other aspects of housing. Lenders may not:

- Refuse to make a mortgage loan;
- Refuse to provide information regarding loans;
- Impose different terms or conditions on a loan (such as different interest rates, points, or fees); or
- Discriminate in appraising property based on race, color, national origin, religion, sex, familial status, or disability.

Most banks and other lending institutions must report to the Federal Financial Institutions Examination Council (FFIEC) on their lending practices. Information from the Federal Financial Institutions Examination Council (FFIEC) is available to the public as Home Mortgage Disclosure Act data (HMDA).

Information reported about the clients and the properties includes data related to such elements as race, gender, marital status, income level of the mortgagee, location of the dwelling by census tract, type of housing, value of housing, etc. The information required and the manner of reporting has been modified several times since the adoption of the HMDA. Collection information requirements continue to be modified to meet the changing needs of those who utilize this information for the purposes intended by Congress. Additionally, the criteria that determine which institutions must report continue to be modified as well.

HMDA data is filed with the regulatory agency given oversight for the particular financial institution performing the reporting. These agencies include the Comptroller of the Currency, the Federal Reserve Board, the Federal Deposit Insurance Corporation, the Office of Thrift Supervision, or the National Credit Union Association. The Federal Financial Institutions Examination Council (FFIEC) is directed to compile annual data by census tract.

The disparities in homeownership across racial and ethnic lines reflect only the symptoms of underlying impediments in the home mortgage application process. The Home Mortgage Disclosure Act (HMDA) data was compiled for the City of Salem to better understand the barriers that members of protected classes face in obtaining mortgages.

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## **Public and Private Sector**

### **Fair Housing Enforcement**

Effective fair housing enforcement lies at the heart of a comprehensive program to affirmatively further fair housing. The structure of this program varies among communities based on community size and resources.

To assure good standing for HUD's Community Planning and Development (CPD) programs, the jurisdiction should address any and all concerns expressed by HUD in contract conditions that relate to fair housing and equal opportunity performance as required by the laws and regulations governing these programs. These concerns include any and all court decisions relating to fair housing and other civil rights laws to which the jurisdiction or the PHA is subject.

The City of Salem can request that all subrecipients who received HUD CDBG funds from the City provide their clients with information on fair housing and the process for filing a complaint. Additionally, the materials should, at a minimum, be available in Spanish.

### **Informational Programs**

Regardless of whether they have completed an AI, all jurisdictions should be conducting fair housing education and outreach activities

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## **Assessment of Current Public and Private Fair Housing Programs**

Census data, HMDA data, and state and federal complaints provide a statistical basis for fair housing issues. There also may be situations where discrimination or other unfair housing practices occur but go unreported. To elicit a deeper understanding of fair housing issues within a community, an analysis of the City of Salem's policies and perspectives can provide a more detailed assessment of the community, extending the analysis beyond just the reported statistics. The key factor in reviewing the City of Salem's policies is evaluating how the jurisdiction manages the HUD Community Development Block Grant funds and supports fair housing practices.

### **HUD Five-Year Consolidated Plan**

The U.S. Department of Housing and Urban Development (HUD) requires each entitlement jurisdiction to complete a Consolidated Plan and certify compliance with the Consolidated Plan Final Rule.

The Consolidated Plan is intended to:

- Serve as the long-range planning document for affordable housing development and community service funding.
- Provide priorities for funding for HUD programs and strategies for implementing the priorities; and
- Be an accessible tool to measure the effect of the local funding strategies.

The City of Salem Oregon receives an annual entitlement allocation from the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant (CDBG) program. The Consolidated Plan provides direction on the investment of CDBG dollars over the next five years, from 2025-2030. Additionally, each year, the City will produce an Annual Action Plan that details how the City will carry out the goals and objectives identified in this Plan.

A key feature of these grants is the City's ability to choose how the funds will be used. HUD provides a broad range of eligible activities that can be utilized with CDBG funding. The City must determine which of the eligible activities will best serve the needs of the community. HUD requires grantees to develop a Five-Year Consolidated Plan to determine the most pressing needs and develop effective, place-based, market-driven strategies to meet those needs.

When developing a Consolidated Plan, the City must first analyze the needs within the City of Salem and then propose strategies to meet those needs.

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## Conclusions and Recommendations

The City of Salem is committed to eliminating racial and ethnic segregation, illegal physical and other barriers to persons with disabilities, and other discriminatory practices in housing.

The City works to:

- Analyze and eliminate housing discrimination
- Promote fair housing choice for all persons
- Provide opportunities for inclusive patterns of housing occupancy regardless of race, color, religion, sex, familial status, disability, and national origin
- Promote housing that is structurally accessible to, and usable by, all persons, particularly persons with disabilities
- Foster compliance with the nondiscrimination provisions of the Fair Housing Act.

Impediments to fair housing choice are:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that **restrict housing choices** or the **availability of housing choices; and**
- Any actions, omissions, or decisions that have this effect.

Policies, practices, or procedures that appear neutral on their face but operate to deny or adversely affect the provision of housing to persons of a particular race, color, religion, sex, disability, familial status, age, marital status, gender identity, sexual orientation, or national origin may constitute such impediments.

Impediments include actions or omissions in the jurisdiction's public or private housing sector that:

- Constitute violations, or potential violations, of the Fair Housing Act
- Community resistance when minorities, persons with disabilities, and/ or low-income persons first move into white and/or moderate- to high-income areas
- Community resistance to the siting of housing facilities for people with disabilities in residential neighborhoods
- Have the effect of restricting housing opportunities on the basis of race, color, religion, sex, disability, familial status, age, gender identity, sexual orientation, marital status, or national origin.

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## Impediments to Fair Housing Choice and Action Steps

As a recipient of HUD CDBG Entitlement funds, the City of Salem is committed to Affirmatively Furthering Fair housing Choices for all residents. Although many issues that affect fair housing choice have been identified, the City is limited in resources and ability to impact all areas. The City of Salem recognizes the following impediments that may have a direct and substantial impact on fair housing choice and are within the City’s ability to impact.

While not listed as an impediment, the City is encouraged to integrate best practices for fair housing and visibility into its Comprehensive Plan update. Evaluating the updated Comprehensive Plan through the lens of fair housing will have a lasting impact as the City continues to evolve and meet residents' needs.

Through data analysis, community feedback, and public engagement, the City of Salem has identified the following as key **impediments to fair housing choice**:

- **Limited Affordable Housing Supply**
  - **Shortage of rental units** for low- and moderate-income households.
  - **Rising housing costs** exceeding local wage growth.
  - Shortage of **“Right-Sized Units”**.
- **Discrimination in Rental Housing**
  - **Disparate treatment** of tenants using Housing Choice Vouchers.
  - **Unlawful screening criteria** that disproportionately impact protected groups.
- **Barriers for People with Disabilities**
  - Lack of **accessible housing options**.
  - Limited enforcement of **reasonable accommodation policies**.
- **Zoning and Land Use Restrictions**
  - Policies that **limit multifamily housing** in high-opportunity areas.
  - **Excessive permitting requirements** that delay affordable housing projects.
- **Language and Outreach Barriers**
  - Limited **Spanish-language resources** for renters and homebuyers.
  - Insufficient **public awareness** about fair housing rights.

Impediment	Goal	Recommended Action Steps
Discrimination Against People with Disabilities	Expand housing access and protections for persons with physical and mental disabilities.	<ul style="list-style-type: none"><li>• Increase landlord education on reasonable accommodations and modifications.</li><li>• Fund and expand fair housing testing focused on disability.</li><li>• Partner with disability</li></ul>

		<p>rights organizations to identify accessible housing needs.</p> <ul style="list-style-type: none"> <li>• Require accessibility design standards in new subsidized housing.</li> </ul>
Lack of Affordable Housing and High-Cost Burden Among Renters	Increase the supply of affordable and income-restricted rental housing.	<ul style="list-style-type: none"> <li>• Incentivize development of deeply affordable units through inclusionary zoning and SDC deferrals.</li> <li>• Preserve naturally occurring affordable housing (NOAH).</li> <li>• Expand housing choice voucher acceptance through landlord incentives.</li> <li>• Prioritize rental housing in areas near jobs, transit, and services.</li> </ul>
Discrimination Based on National Origin and Familial Status	Reduce discrimination against immigrant, multi-generational, and linguistically diverse households.	<ul style="list-style-type: none"> <li>• Develop and implement a HUD-compliant Language Access Plan (LAP).</li> <li>• Provide translated fair housing materials and outreach campaigns in Spanish and other languages.</li> <li>• Conduct fair housing testing focused on familial status and national origin.</li> <li>• Strengthen enforcement of local fair housing ordinances and educate landlords on tenant rights.</li> </ul>
Insufficient Supply of Appropriately Sized Units for Smaller Households	Align unit sizes with demographic trends to improve access for smaller households. “Right Size” the affordable housing stock to align with Salem’s needs.	<ul style="list-style-type: none"> <li>• Encourage development of studios and one-bedroom units, particularly near transit and in mixed-use zones.</li> <li>• Use zoning reform to promote ADUs and cottage clusters.</li> <li>• Offer density bonuses for developments that include smaller units.</li> <li>• Monitor unit mix in new construction to ensure</li> </ul>

		proportional development of smaller units.
Lack of Robust Local Fair Housing Enforcement and Testing	Improve fair housing enforcement and outreach capacity.	<ul style="list-style-type: none"> <li>• Seek funding for local, sustained fair housing testing in partnership with FHCO.</li> <li>• Continue to host annual fair housing trainings for property managers and tenant advocates.</li> <li>• Create a centralized online reporting tool and publicize complaint procedures.</li> <li>• Develop and distribute a multilingual “Know Your Rights” toolkit.</li> </ul>
Limited Language Access for LEP Individuals	Ensure consistent, equitable access to Fair Housing services and HUD-funded programs for LEP individuals.	<ul style="list-style-type: none"> <li>• Create a HUD Approved Language Access Plan (LAP)</li> <li>• Translate vital HUD documents and web content into Spanish.</li> <li>• Certify employees providing interpretation services.</li> <li>• Partner with community groups for bilingual outreach.</li> <li>• Increase visibility of language assistance on City platforms.</li> </ul>

### 1. Discrimination Against People with Disabilities

- Disability-related complaints made up nearly 70% (129 of 185) of all fair housing allegations filed in Salem over the last five years.
- Barriers include refusal to make reasonable accommodations or modifications, and failure to understand or comply with fair housing requirements.
- Limited accessible housing stock, especially among older units, compounds the problem.

### 2. Lack of Affordable Housing and High-Cost Burden Among Renters

- Over 54% of Salem renters are cost burdened, meaning they spend more than 30% of their income on rent.
- Rent has increased by 69.4% since 2013, far outpacing income growth (56.4%).
- This burden disproportionately affects low-income households, households of color, seniors, and voucher holders—many of whom are members of protected classes.

### 3. National Origin and Familial Status Discrimination

- Fair housing complaints and anecdotal evidence point to increasing discrimination against multi-generational and immigrant households.
- Familial status complaints (14) and national origin complaints (16) have been documented, and stakeholders report that landlords sometimes object to larger households or non-nuclear family living arrangements.
- Language access remains a barrier for Spanish-speaking residents and those with limited English proficiency.

#### **4. Insufficient Supply of Appropriately Sized Units for Smaller Households**

- 62.4% of Salem households consist of one or two people, but only 26.5% of rental units are studio or one-bedroom.
- This mismatch forces small households into larger, more expensive units or shared housing, which can lead to crowding or displacement—especially for low-income and elderly individuals.

#### **5. Lack of Robust Local Fair Housing Enforcement and Testing**

- Only eight fair housing tests were conducted in Salem between 2020 and 2023, and funding for local testing has been cut.
- Many complaints were not fully investigated due to lack of contact or resources (66 of 95 cases closed without resolution).
- While FHCO and legal partners are active, capacity and community awareness of fair housing rights appear limited.

#### **6. Create a HUD-approved Language Access Plan (LAP)**

- Many Salem residents have limited English proficiency (LEP), especially among the city's Hispanic/Latino population. Language barriers limit access to fair housing information, HUD-funded programs, and complaint procedures.
- Spanish is the most commonly needed language, but materials and services are not consistently available. This impedes equal access to housing services and protections and may contribute to underreporting discrimination by LEP individuals.

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## **Appendix A**

### **Housing and Related Laws**

#### **File a Complaint**

HUD, FAIR HOUSING AND EQUAL OPPORTUNITY  
Alaska, Idaho, Oregon, and Washington



Seattle Regional Office of FHEO  
U.S. Department of Housing and Urban Development Seattle Federal Office Building  
909 First Avenue, Room 205  
Seattle, Washington 98104-1000  
(206) 220-5170 (800) 877-0246  
TTY (206) 220-5185

*Civil Rights Complaints:* ComplaintsOffice10@hud.gov <https://www.hud.gov/fairhousing>

**FHEO Intake Specialist 1-800-669-9777 or 1-800-877-8339.**

### **Information About Filing a Complaint**

If you believe your rights may have been violated, you are encouraged to submit a complaint. Because there are time limits on when a complaint can be filed with HUD after an alleged violation, you should submit a complaint as soon as possible.

When submitting a complaint, please provide as much information as possible, including:

- Your name and address;
- The name and address of the person(s) or organization your complaint is against;
- The address or other identification of the housing or program involved;
- A short description of the event(s) that cause you to believe your rights were violated; and
- The date(s) of the alleged violation.

### **Privacy Statement**

The information submitted to HUD may be used to investigate and process claims of housing and other types of discrimination. It may be disclosed for lawful investigatory purposes, including to the U.S. Department of Justice for its use in the filing of pattern and practice suits of housing discrimination or the prosecution of the person(s) who committed the discrimination where violence is involved; the public, where appropriate; and to State or local fair housing agencies that administer substantially equivalent fair housing laws for complaint processing. Though disclosure of the information is voluntary, failure to provide some or all of the requested information may result in the delay or denial of help with your housing discrimination complaint.

### **Retaliation Is Illegal**

It is illegal to retaliate against any person for making a complaint, testifying, assisting, or participating in any manner in a proceeding under HUD's complaint process at any time, even after the investigation has been completed. The Fair Housing Act also makes it illegal to retaliate against any person because that person reported a discriminatory practice to a housing provider or other authority. If you believe you have experienced retaliation, you can file a complaint.

### **Assistance for Persons with Disabilities**

HUD provides a toll-free teletypewriter (TTY) line: 1-800-877-8339. You can also ask for disability-related assistance when you contact FHEO, including reasonable accommodations and auxiliary aids and services.

### **Assistance for Persons with Limited English Proficiency**

You can file a complaint in any language. For persons with limited English proficiency, HUD provides interpreters. HUD also provides a Spanish language version of the online housing complaint form. You can find descriptions of your fair housing rights in several languages other than English at <https://www.hud.gov/fairhousing>.

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## **Statutes**

### **Fair Housing Act**

*42 U.S.C. §§ 3601-19*

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, because of race, color, religion, sex, familial status, national origin, and disability. It also requires that all federal programs relating to housing and urban development be administered in a manner that affirmatively furthers fair housing.

### **Title VI of the Civil Rights Act of 1964**

*42 U.S.C. § 2000d-1*

Title VI prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.

### **Section 504 of the Rehabilitation Act of 1973**

*29 U.S.C. § 794*

Section 504 prohibits discrimination based on disability in any program or activity receiving federal financial assistance.

### **Section 508 of the Rehabilitation Act of 1973**

*29 U.S.C. § 794d*

Section 508 requires federal agencies to ensure that the electronic and information technology they develop, procure, or use allows individuals with disabilities to have ready access to and use of the information and data that is comparable to that of individuals without disabilities.

### **Title II of the Americans with Disabilities Act of 1990**

*42 U.S.C. §§ 12131 – 12165*

Title II of the ADA prohibits discrimination based on disability in programs and activities provided or made available by public entities. HUD enforces Title II with respect to housing-related programs and activities of public entities, including public housing, housing assistance and housing referrals.

### **Title III of the Americans with Disabilities Act of 1990**

*42 U.S.C. § 12181 – 12189*

Title III of the ADA prohibits discrimination based on disability in the goods, services, facilities, privileges, advantages, and accommodations of places of public accommodations owned, leased, or operated by private entities. The Department of Justice enforces Title III of the ADA, but certain HUD recipients and private entities operating housing and community development programs are covered by Title III of the ADA.

### **Architectural Barriers Act of 1968**

*42 U.S.C. § 4151 et seq.*

The Architectural Barriers Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 must be accessible to and useable by persons with disabilities.

### **Section 109 of Title I of the Housing and Community Development Act of 1974**

*42 U.S.C. § 5309*

Section 109 prohibits discrimination on the basis of race, color, national origin, sex, and religion in any program or activity funded in whole or in part under Title I of the Community Development Act of 1974, which includes Community Development Block Grants.

### **Title IX of the Education Amendments Act of 1972**

*20 U.S.C. §§ 1681-83, 1685-88*

Title IX prohibits discrimination on the basis of sex in any education programs and activities that receive federal financial assistance. HUD enforces Title IX when it relates to housing affiliated with an educational institution.

### **Violence Against Women Act**

*42 U.S.C. § 14043e-11*

VAWA provides housing protections for victims of domestic violence, dating violence, sexual assault, and stalking in many of HUD's housing programs. VAWA also requires the establishment of emergency transfer plans for facilitating the emergency relocation of certain tenants who are victims of domestic violence, dating violence, sexual assault, or stalking.

### **Age Discrimination Act**

*42 U.S.C. §§ 6101 – 6107*

The Age Discrimination Act of 1975 prohibits discrimination on the basis of age in programs and activities receiving federal financial assistance.

## **Executive Order 11063**

### *Equal Opportunity in Housing*

Executive Order 11063, issued on November 20, 1962, prohibits discrimination in the sale, leasing, rental, or other disposition of properties and facilities owned or operated by the federal government or provided with federal funds.

## **Executive Order 12892**

### *Leadership and Coordination of Fair Housing in Federal Programs: Affirmatively Furthering Fair Housing*

Executive Order 12892, issued on January 17, 1994, requires federal agencies to affirmatively further fair housing in their programs and activities, and provides that the Secretary of HUD will be responsible for coordinating the effort.

## **Executive Order 12898**

### *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*

Executive Order 12898, issued on February 11, 1994, requires that each federal agency conduct its program, policies, and activities that substantially affect human health or the environment in a manner that does not exclude or otherwise subject persons to discrimination based on race, color, or national origin.

## **Executive Order 13166**

### *Improving Access to Services for Persons With Limited English Proficiency*

Executive Order 13166, issued on August 11, 2000, requires each federal agency to take steps to ensure that eligible persons with limited English proficiency are provided meaningful access to all federally-assisted and federally-conducted programs and activities.

## **Executive Order 13217**

### *Community Based Alternatives for Individuals With Disabilities*

Executive Order 13217, issued on June 18, 2001, requires federal agencies to evaluate their policies and programs to determine if any can be revised or modified to improve the availability of community-based living arrangements for persons with disabilities.

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## **Regulations**

*Accessibility Standards for Design, Construction, and Alteration of Publicly Owned Residential Structures*  
[24 C.F.R. part 40](#)

*Affirmative Fair Housing Marketing*  
[24 C.F.R. part 108](#)  
[24 C.F.R. part 110](#)  
[24 C.F.R. part 200, subpart M](#) [24 C.F.R. § 203.12\(b\)\(3\)](#)

*Affirmatively Furthering Fair Housing*  
[24 C.F.R. §§ 5.150 – 5.168](#)

*Certification and Funding of State and Local Fair Housing Enforcement Agencies*  
[24 C.F.R. part 115](#)

*Collection of Data*  
[24 C.F.R. part 121](#)

*Discriminatory Conduct Under the Fair Housing Act*  
[24 C.F.R. part 100](#)

*Equal Access Rule*  
[24 C.F.R. § 5.105](#)  
[24 C.F.R. § 5.106](#)

*Fair Housing Act Complaint Processing*  
[24 C.F.R. part 103](#)

*Fair Housing Poster*  
[24 C.F.R. part 110](#)

*Fair Housing Initiatives Program*  
[24 C.F.R. part 125](#)

*Information and Communication Technology  
Standards and Guidelines*  
[36 C.F.R. part 1194](#)

*Nondiscrimination and Equal Opportunity in Housing  
Under Executive Order 11063*  
[24 C.F.R. part 107](#)

*Nondiscrimination Based on Handicap in Federally-  
Assisted Programs and Activities of the Department  
of Housing and Urban Development*

[24 C.F.R. part 8](#)

*Nondiscrimination in Federally-Assisted Programs of  
the Department of Housing and Urban Development  
– Effectuation of Title VI of the Civil Rights Act of 1964*  
[24 C.F.R. part 1](#)

*Nondiscrimination in Programs and Activities  
Receiving Assistance under Title I of the Housing and  
Community Development Act of 1974*  
[24 C.F.R. part 6](#)

*Nondiscrimination on the Basis of Age in HUD  
Programs or Activities Receiving Federal Financial  
Assistance*  
[24 C.F.R. part 146](#)

*Nondiscrimination on the Basis of Disability in State  
and Local Government Services*  
[28 C.F.R. part 35](#)

*Nondiscrimination on the Basis of Sex in Education  
Programs or Activities Receiving Federal Financial  
Assistance*  
[24 C.F.R. part 3](#)

*Protection for Victims of Domestic Violence, Dating  
Violence, Sexual Assault, or Stalking*  
[24 C.F.R. §§ 5.2001 – 5.2011](#)

