



Broome County Safe Housing Task Force

Executive Summary

County Executive Jason Garnar launched the Safe Housing Task Force in the fall of 2018 with short- and long-term goals aimed at stable, decent, and affordable housing throughout Broome County. With co-chairs Rebecca Rathmell and Mark Schuster leading the core group selection and collaborative discussion, the Task Force recommendations to all municipalities and the County center around four strategic areas: protections, development, housing quality, and tenant and landlord supports. Broome County has already started implementing recommendations, with others requiring legislative approval, funding sources, or more program development.

- Prioritize Protections
 - [Support New York State Fair Housing Protections at the County Level](#)
 - [Expand CNY Fair Housing Coverage](#)
 - [Implement Eviction Prevention Protocol](#)
 - [Inclusionary Zoning](#)
- Strategic Development
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 - [Develop Landlord/Tenant Resource Pages on Broome County Website](#)
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The Task Force believes even more innovative solutions can come from continued conversations, more diverse voices, and broader collaboration. Included in the recommendations is a Fair Housing Law which could be considered by the Broome County Legislature. This law affirms the housing human rights protected by New York State and formalizes an advisory board with a focus on continuing these important discussions.

The Safe Housing Task Force has completed its work and submits the following recommendations but emphasizes that this is just the start of a process to improve housing in our community.

Co-Chairs

Rebecca Rathmell - Southern Tier Homeless Coalition

Mark Schuster - Broome County Health Department Healthy Neighborhoods Program

Executive Committee

County Executive Jason Garnar

City of Binghamton Mayor Rich David

Village of Johnson City Mayor Greg Deemie

County Legislator Mary Kaminsky

Clerk of the Legislature Aaron Martin

Town of Union Supervisor Rick Materese

Core Group

Nancy Williams - BCDSS Commissioner

Sonja Bennett - BCDSS Deputy Commissioner Temporary Assistance Programs

Maria Roumiantseva - Legal Services Central NY

Dr. Tonia Thompson - Superintendent Binghamton City School District

Daria Golazeski - Town of Union Deputy Commissioner of Public Works for Codes & Ordinances

Dai Korba - Johnson City Planning

Tom Costello - Supervisor of Binghamton Construction, Zoning & Code Enforcement

Chris Schleider - Binghamton Construction, Zoning & Code Enforcement

Sharon Sorkin - Binghamton Corporate Council

Pam Guth - Rural Health Network of Central NY

Larry Sal - Landlord



Broome County Safe Housing Task Force – Presenting Issues

- Instances of homelessness & housing instability are up almost 40% across Broome County.ⁱ Broome County has the 2nd lowest availability rate in the State of affordable rental units for extremely low-income households.ⁱⁱ Local school districts report mobility rates among students as high as 40%. Over 80% of extremely low-income households in Broome County spend more than half of their monthly income on housing costs.ⁱⁱⁱ
- A disproportionate number of locally subsidized apartments indicate home health hazards^{iv}. Instances of children under the age of 6 with elevated blood lead levels are significantly higher in Broome County than in Upstate NY & all of NYS^v.
- Recent public policy to protect the lowest income households from illegal eviction or discrimination based on source of income will require local enforcement support. Current protocol does not effectively deter residency in poor quality apartments.

Broome County Safe Housing Task Force – Protocol & Policy Recommendations

1 PRIORITIZE PROTECTIONS

- ❖ Support New York State Fair Housing Protections at the County Level
 - Per the City of Binghamton’s [*Analysis to Impediments to Fair Housing*](#), prepared by CNY Fair Housing in 2015, “Residents who receive rental subsidies such as Housing Choice Vouchers and DSS rental assistance face limited options in locating a unit to rent...[and] families with children, particularly low-income families, face limited options available to rent.” CNY Fair Housing recommended adding Source of Legal Income as a class protected by local anti-discrimination laws and promoting efforts to have Source of Income added as a protected class in Broome County and New York State. With the passing of the Lawful Source of Income Non-Discrimination Act of 2019 in NYS in April, Task Force members believe local support will be crucial to ensuring the expanded protections are effectively applied on behalf of vulnerable households. Recommendation is to introduce a Local Law adopting a **Broome County Fair Housing Law** (Appendix A) to promote the availability and accessibility of housing and real property to all persons and prevent unlawful discriminatory real estate practices against the actual or perceived group identity of the same. The Fair Housing Law would also establish a Fair Housing Advisory



Board to continue Safe Housing Task Force efforts in facilitating collaborative conversations and implementing recommendations.

- Though not explicitly written within the proposed Local Law, Task Force members agree that the importance and complexity of the Task Force's mission warrants a fulltime focus within County planning activities.
 - Annual salary + benefits cost estimate – \$75,000 (based on BAPA G20 comparison)
- ❖ Expand Fair Housing coverage
 - Support [CNY Fair Housing](#) in expanding outreach, enforcement, & litigation services to Broome County
 - Expansion cost estimate – Minimum of \$12,000
 - 350 on-site office hours for intake and investigative staff (Does not include attorney fees.)
 - 2 pair of Testers
- ❖ Implement Eviction Prevention protocol
 - NYS Social Services Law 143-B ([Spiegel Law](#)) authorizes local Departments of Social Services to withhold the payment of rent in any case where housing accommodations occupied by a recipient household demonstrate code violations that are dangerous, hazardous, or detrimental to life or health. Broome County Department of Social Services (BCDSS) has proactively and effectively used Spiegel Law in partnership with municipal Code offices and the Broome County Health Department to leverage compliance with local Code Ordinances and the Lead Abatement Program. Task Force members reported, however, that though Spiegel Law restricts landlords from pursuing eviction during any period which dangerous or hazardous conditions or conditions detrimental to life or health are/were outstanding, landlords are unaware of their responsibilities under Spiegel Law and often move to evict due to non-payment of rent. Similarly, recipients are unaware of their rights and responsibilities and often withhold their portion of the rent without reserve or fail to appeal eviction proceedings. Additionally, treatment of Spiegel Law cases at the civil court level were reported to be inconsistent among judges not well-versed in the perimeters of Spiegel Law. Task Force members thus recommended the revision of BCDSS' existing *Rent Suspension Notice* to reflect a Landlord section outlining protections from eviction and a Tenant section outlining



what to do if their landlord attempts to evict. (See Appendix B for revised notice.)

- Promote consistent treatment of Spiegel Law at municipal Civil Court levels
- Educate municipalities outside of the Triple Cities regarding Spiegel Law and its potential effectiveness in improving housing quality while preventing eviction
- Explore Lease Terms
- ❖ Inclusionary Zoning
 - Per the [Broome County Housing Study](#), commissioned by The Agency in 2017, “the total of on-campus housing provided by Binghamton University, combined with the existing stock of off-campus student housing, has reached a *maximum level of supply*. Any new beds added to this inventory *will exceed demand*.” Additionally, the *Study* advises that current and planned new construction and adaptive reuse housing projects *will effectively meet* the high-end luxury apartment market demand upon completion. Conversely, a 2018 National Low Income Housing Coalition tabulation of HUD *Comprehensive Housing Affordability Strategy (CHAS)* data from 2011-2015 demonstrates a deficit of 7,140 affordable and available units for extremely low-income households in Broome County.^{vi} In fact, **for every 100 extremely low-income renter households in Broome, there are only 17 affordable and available units – the 2nd lowest availability rate in the State.** For very low-income renter households, a deficit of 4,035 units of affordable and available units is demonstrated, 72 for every 100. In light of these deficits, Task Force members urge municipal leaders to prioritize the development of below market rate units for very low- and extremely low-income households at monthly rental rates ranging from \$475-710. Policy options would be either a mandatory inclusionary zoning approach (“set-asides”) – requiring developers building housing to include a percentage of units (on average 15% but variable) that are affordable at ELI or VLI levels – or a voluntary incentivized inclusionary zoning approach – e.g. reserving PILOT programs or increased density bonuses for developers willing to do the same or in exchange for capital improvement commitments from property owners willing to continue to rent at the lowest income levels.
 - Task Force members met with The Agency (formerly the Broome County Industrial Development Agency) personnel to



discuss [Uniform Tax Exemption Policies](#) re: Real Property Tax/Payments-in-lieu-of-taxes (PILOT) eligibility criteria. Per staff, approval criteria follow local law. Any adjustments would need to be made at municipal or County levels.

2 STRATEGIC DEVELOPMENT

❖ Municipal Involvement in County Tax Foreclosure Auction

- Per the [Broome County Housing Study](#), commissioned by The Agency in 2017, institutional investment is higher in Broome County than other areas of the State and the Country – 4% in 2017 compared to a national average of slightly under 2%. Task Force members perceive the County Real Property offices' current tax foreclosure and auction process as a perpetuating factor of irresponsible out-of-county investment and the subsequent decline of local housing stock. Recommendation is to offer municipalities and other interested parties the opportunity for collective discussions re: the strategic use of foreclosed properties:
 - Real Property personnel to forward the preliminary list of foreclosed properties to municipal Code and Planning staff and Broome County Land Bank Corporation leadership once finalized and at least 2 weeks prior to scheduled Real Property Auction dates, allowing all parties to review and propose recommendations re: inspections, rehab eligibility, transfers, etc.
 - List should also be forwarded to BCDSS and BC Health Department to allow for cross referencing re: properties considered to be available permanent housing and/or with open violations for lead hazards.
 - The County Executive's Office hosted a discussion on May 15, 2019 with David Hamlin, Director of Broome County's Real Property Tax Services office, to educate municipal and non-profit leaders on the County's tax foreclosure auction process, the distribution of the property list, and the potential to promote strategic partnerships regarding the acquisition and use of foreclosed properties for affordable development. The



June and August auction list was then shared and follow up negotiations were encouraged. It is the recommendation of Task Force members that such collaborative engagement continues in subsequent Auctions.

- ❖ Non-Profit Partnerships to Build Permanent Supportive Housing
 - Affordable housing development, especially when targeted to very low- and extremely low-income households, is profit prohibitive. County/municipal planning offices should partner with eligible non-profit organizations re: site control for projected Permanent Supportive Housing projects to reduce acquisition costs and to subsidize capital and operations costs via Federal, State, and local procurement streams (HHAP, FHTF, SHOP, WAP, ESSHI, etc.).
 - See <https://wbng.com/news/local-news/2018/12/12/once-home-to-blight-binghamton-properties-set-to-house-the-homeless/>
 - NYS HHAP RFP anticipated May 2019
 - NYS ESSHI RFP anticipated June 2019
- ❖ Landlord Engagement & Responsible Referral Mechanisms
 - Rental assistance is available to extremely low-income households in Broome County via HUD/NYS homelessness prevention, rapid rehousing, and permanent supportive housing programs as well as BCDSS, however no comprehensive responsible referral mechanism exists for rental assistance recipients and no available resource designates a fulltime Housing Specialist responsible for housing identification and landlord recruitment/retention on behalf of rental assistance recipients. Recommendation is to pursue funding (first via *NYS Solutions to End Homelessness Program – Spring 2019*; second via *HUD CoC Program Rapid Rehousing Expansion – Spring 2019*; third TBD) to designate a Housing Specialist responsible for the activities above.
 - Task Force members recommended revising BCDSS Landlord List to include a disclaimer clarifying that housing choice remains the decision of the recipient and that landlords listed are not endorsed by the Department. This was completed in July.
 - Pursue alternative referral mechanism



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- Admission – cost estimate < \$10,000/annual subscription (<https://www.hominc.com/padmission/>)
 - Establish a *Relocation Assistance Program*

3 IMPROVE QUALITY

❖ Preoccupancy Inspections

- In data collected from 975 in-home safety survey visits conducted via neighborhood canvas or as a result of internal/external referrals and tenant complaints, the Broome County Healthy Neighborhoods Program’s home safety study concludes that home health hazards are “more prevalent in rental units subsidized by local funds from the Department of Social Services than in rental units subsidized by federal Section 8 funds” or rental units for which no subsidy is provided. Though it is important to note the differences between the two programs – BCDSS determines eligibility for Temporary Assistance, which is not a housing program nor is it funded to be administered as such – Task Force members believe that the primary factor impacting this differential is the Housing Choice Voucher program’s regulations ([24 CFR Part 982.401](#)) mandating that basic housing quality standards are met before assistance can be paid on behalf of recipients. Currently, Department of Social Services directives ([NYCRR Title 18 Section 352.3](#)) neither require nor fund efforts by local social services districts to determine the habitability of permanent housing for which a monthly allowance for rent is to be paid on behalf of eligible recipients and districts are prohibited from creating local eligibility requirements based on housing conditions. State directives do not, however, restrict districts from efforts to ensure unit safety prior to recipient occupancy. Task Force members recommended that BCDSS partner with municipal Code Enforcement offices to offer voluntary opportunities for habitability inspections prior to recipient occupancy. Since, BCDSS has entered the preliminary phases of a partnership with City of Binghamton Code Enforcement to develop a process for voluntary opportunities for habitability inspections and has dedicated staff to coordinate this effort.



❖ Proactive Code Enforcement

- The City of Binghamton adopted [Permanent Ordinance 13-27](#) in 2013, amending Code of Ordinances Chapter 265-6 (*Rental Registration*) in an effort to “properly administer and inspect residential rentals” within City limits to “ensure that all residential rental properties are safe, habitable, and compliant with Building Code regulations.” The ordinance pairs property owners’ completion of a Rental Registration Application for each Rental Property with health and safety/compliance inspections prior to the issuance of a Certificate of Compliance. Per Task Force members, the initial implementation saw only 50% participation from local property owners and about 50% of registered units were inspected. In addition to the challenges of capacity and logistics, i.e. limited staff and gaining access to occupied units, the compulsory inspections outlined in the ordinance were identified as a liability and barrier to implementation. Per City of Binghamton Corporation Counsel, existing case law demonstrates that ordinances requiring property owners to consent to warrantless inspections in order to rent their premises are unconstitutional. Existing New York Department of State Uniform Code regulations ([NYS 19 CRR Part 1203.3\(h\)\(2\)](#)) requiring municipalities to conduct triennial fire safety and property maintenance inspections of all multiple dwellings (3+ units) were discussed as an alternative. Task Force members identified that such inspections would be most effective if internal inspections were pursued in addition to external, and if municipal inspection reports were forwarded to County personnel for use in the completion of property owner Rental Registrations. Task Force members met with County GIS personnel who confirmed the system’s capacity to develop a Rental Registration survey via *Survey 123* for distribution with annual property tax documentation beginning as early as 2020. It was also recommended that the County offer municipalities, particularly those without full-time Code Enforcement staff, shared services support for NYS 19 CRR 1203.3 compliance.

❖ Promote Data Sharing & Integration

- Per municipal Code offices, existing proactive enforcement ordinances (City of Binghamton & Village of Johnson City) are ineffective in



ensuring the accuracy and/or completeness of property and property owner information, particularly when dealing with non-compliant or irresponsible landlords. Recommendations from Task Force members are:

- Explore the compatibility of municipal Code Enforcement software with General Code/Municipality 5 *Community Officials Data Exchange (C.O.D.E.)*
 - **C.O.D.E. Annual Subscription – Town of Union: \$10,800; Village of JC: \$3,600**
 - Strengthen information sharing between municipal Code Enforcement offices, BCDSS, and BC Health Department re: the status of property owners/properties under Spiegel
 - See [Perm R16-102](#) between Broome County (Health Department) and City of Binghamton (Code Enforcement)
- ❖ Administrative Violations Approach
- Per Task Force members, current civil approaches to Code noncompliance are lengthy and ineffective. Recommendation is to consider an administrative approach, establishing a Municipal Violations Bureau to review violations and issue fines without requiring cases to be heard at court levels. Similar to Assemblyman William Magnarelli and Senator John DeFrancisco’s [sponsorship of municipal violations bureau legislation](#) on behalf of the City of Syracuse to Governor Cuomo in 2017, Task Force members recommend:
 - Municipal outreach to Assemblywoman Lupardo and Senator Akshar for support in submitting a proposal to allow the Bureau’s creation;
 - Drafting of local legislation to outline how the Bureau will operate, applicable violations, and fee schedules.
 - See:
 - City of Syracuse [Municipal Violations Bureau](#)
 - City of Rochester [Municipal Code Violations Ticketing System & Bureau](#)



4 TARGETED SUPPORT

- ❖ Develop Landlord/Tenant Resource Pages on BC website
- ❖ Streamline/coordinate referral processes
- ❖ Increase availability of/access to property rehabilitation & remediation resources for local property owners
 - Per Task Force members, property owners are often unaware of financial assistance programs available for rehab/remediation projects or are deterred by owner investment requirements that may exceed their financial capacity.
- ❖ Promote responsible landlords



APPENDIX A – BROOME COUNTY FAIR HOUSING LAW

LOCAL LAW INTRO. NO.

A LOCAL LAW amending the Laws of Broome County in relation to the adoption of the Broome County Fair Housing Law.

BE IT ENACTED by the Board of Legislators of the County of Broome:

Section 1. The Broome County Charter and Administrative Code is hereby amended to add a new Chapter 251 to read as follows:

Chapter 251

FAIR HOUSING LAW

Article I. Fair Housing Law

- Sec. 251-1 Declaration of policy.
- Sec. 251-2 Definitions.
- Sec. 251-3 Unlawful discriminatory real estate practices.
- Sec. 251-4 Unlawful discriminatory real estate practices in relation to credit.
- Sec. 251-5 Additional provisions defining discriminatory practices.
- Sec. 251-6 Creation of a Fair Housing Advisory Board.
- Sec. 251-7 Formulations of policies by the Board.
- Sec. 251-8 Powers and duties of the Board.
- Sec. 251-9 Relations with county departments and agencies.
- Sec. 251-10 Jurisdictional limitations.
- Sec. 251-11 Enforcement by private persons.
- Sec. 251-12 Separability.
- Sec. 251-13 Effect.



Sec. 251-1 Declaration of policy.

A. The general purpose of this law is to codify in local law the full scope of Article 15 Human Rights Law within New York State Executive Law to promote the availability and accessibility of housing and real property to all persons; to prohibit unlawful discriminatory real estate practices in real property transactions, whether direct or indirect, which deny those persons equal rights and opportunities in acquiring, disposing of, or occupying real property; to support enforcement mechanisms for the accomplishment of such purpose; and to create a Fair Housing Advisory Board to promulgate efforts toward this end.

B. This law shall not be construed to endorse specific beliefs, practices, or lifestyles.

C. Nothing in this law is deemed to deny any person the right to institute any action or to pursue any civil or criminal remedy for the violation of such person's civil rights.

D. Remedies under this law shall include such relief authorized by law as may be appropriate and reasonable to provide temporary or preliminary relief as well as permanent relief in order to make the aggrieved person whole and eliminate the unlawful discriminatory real estate practice.

E. Nothing contained in this law shall be construed to create or form the basis for any liability on the part of Broome County, or its officers, employees or agents, for any injury or damage resulting from or by reason of any act or omission in connection with the implementation or enforcement of this law on the part of Broome County by its officers, employees, or agents.

Sec. 251-2 Definitions.

A. *Alienage* or *citizenship status* shall mean:

1. The citizenship of any person; or
2. The immigration status of any person who is not a citizen or national of the United States.

B. *Board* shall mean the Broome County Fair Housing Advisory Board.

C. *Creditor* when used in this article, means any person or financial institution which does business in this state and which extends credit or arranges for the extension of credit by others. The term creditor includes, but is not limited to, banks and trust companies, private bankers, foreign banking corporations and national banks, savings banks, licensed lenders, savings and loan associations, credit unions, sales finance companies, insurance premium finance agencies, insurers, credit card issuers, mortgage brokers, mortgage companies, mortgage insurance corporations, wholesale and retail merchants and factors.

D. *Disability* shall mean:

1. A physical, mental, psychological, or medical impairment resulting from anatomical, physiological, genetic or neurological conditions which prevents the exercise of a normal bodily function or is demonstrable by medically accepted clinical or laboratory diagnostic techniques; or



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2. A record of such an impairment; or
 3. A condition regarded by others as such an impairment.
- E. *Discrimination* shall include, but shall not be limited to, segregation, separation, harassment, physical intimidation, acts of hate or bias and physical violence.
- F. *Familial Status* shall mean:
1. Any person who is pregnant or has a child or is in the process of securing legal custody of any individual who has not attained the age of eighteen years; or
 2. One or more individuals (who have not attained the age of eighteen years) being domiciled with:
 - a. A parent or another person having legal custody of such individual or individuals; or;
 - b. The designee of such parent or another person having legal custody of such individual or individuals.
- G. *Gender identity or expression* shall mean:
1. A person's actual or perceived gender-related identity, appearance, behavior, expression, or other gender-related characteristic regardless of the sex assigned to that person at birth, including but not limited to, the status of being transgender.
- H. *Group identity* shall mean the race, color, religion, age, national origin, alienage or citizenship status, ethnicity, familial status, creed, gender, sexual orientation, marital status or disability of a person or persons, a person's lawful source of income, or a person's status as a victim of domestic violence, sexual abuse, or stalking.
- I. *Housing accommodation* includes any building, structure, or portion thereof which is used or occupied or is intended, arranged or designed to be used or occupied, as the home, residence or sleeping place of one or more human beings.
- J. *Lawful Source of Income* shall include, but not be limited to, child support, alimony, foster care subsidies, income derived from social security, or any form of federal, state, or local public assistance or housing assistance including, but not limited to, Section 8 vouchers, or any other form of housing assistance payment or credit whether or not such income or credit is paid or attributed directly to a landlord, and any other forms of lawful income. The provisions of this subdivision shall not be construed to prohibit the use of criteria or qualifications of eligibility for the sale, rental, leasing or occupancy of publicly-assisted housing accommodations where such criteria or qualifications are required to comply with federal or state law, or are necessary to obtain the benefits of a federal or state program. A publicly assisted housing accommodation may include eligibility criteria in statements, advertisements, publications or applications and may make inquiry or request information to the extent necessary to determine eligibility.



K. *Multiple dwelling* as herein used, means a dwelling which is occupied, as a rule, for permanent residence purposes and which is either sold, rented, leased, let or hired out, to be occupied as the residence or home of three or more families living independently of each other. A "multiple dwelling" shall not be deemed to include a hospital, convent, monastery, asylum, or public institution, or a fireproof building used wholly for commercial purposes except for not more than one janitor's apartment and not more than one penthouse occupied by not more than two families. The term "family," as used herein, means either a person occupying a dwelling and maintaining a household, with not more than four boarders, roomers or lodgers, or two or more persons occupying a dwelling, living together and maintaining a common household, with not more than four boarders, roomers or lodgers. A "boarder," "roomer" or "lodger" residing with a family means a person living within the household who pays a consideration for such residence and does not occupy such space within the household as an incident of employment therein. Within the context of this definition, the terms "multiple dwelling" and "multi-family dwelling" are interchangeable.

L. *National origin* shall include ancestry.

M. *Necessary party* shall mean any person who has such an interest in the subject matter of a proceeding under this article, or whose rights are so involved, that no complete and effective disposition can be made without his or her participation in the proceeding.

N. *Owner occupied* shall mean physical possession, in part or in full, by the owner.

O. *Parties to the proceeding* shall mean the complainant, respondent, necessary parties and persons permitted to intervene as parties in a proceeding with respect to a complaint filed under this article.

P. *Person* shall mean one or more individuals, partnerships, associations, corporations, legal representatives, trustees, trustees in bankruptcy, or receivers.

Q. *Person in the business of selling or renting housing accommodations* shall include anyone who:

1. Within the preceding twelve months, has participated as principal in three or more transactions involving the sale or rental of any housing accommodation or any interest therein;

2. Within the preceding twelve months, has participated as agent, other than in the sale of his own personal residence, in providing sales or rental facilities or sales or rental services in two or more transactions involving the sale or rental of any dwelling or any interest therein; or

3. Is the owner of any dwelling designed or intended for occupancy by, or occupied by, five or more families.

R. *Publicly-assisted housing accommodations* shall include all housing accommodations within Broome County in:

1. public housing;

2. housing constructed after July first, nineteen hundred fifty, within Broome County which is:



- a. exempt in whole or in part from taxes levied by the State or County or any of its political subdivisions, or;
 - b. constructed on land sold below cost by the State or County or any of its political subdivisions or any agency thereof, pursuant to the federal housing act of nineteen hundred forty-nine, or;
 - c. constructed in whole or in part on property acquired or assembled by the State or County or any of its political subdivisions or any agency thereof through the power of condemnation or otherwise for the purpose of such construction or for the acquisition, construction, repair or maintenance of which the State or County or any of its political subdivisions or any agency thereof supplies funds or other financial assistance;
3. housing which is located in a multiple dwelling, the acquisition, construction, rehabilitation, repair or maintenance of which is, after July first, nineteen hundred fifty-five, financed in whole or in part by a loan, whether or not secured by a mortgage, the repayment of which is guaranteed or insured by the federal government or any agency thereof, or the State or County or any of its political subdivisions or any agency thereof, provided that such a housing accommodation shall be deemed to be publicly assisted only during the life of such loan and such guaranty or insurance; and
4. housing which is offered for sale by a person who owns or otherwise controls the sale of ten or more housing accommodations located on land that is contiguous (exclusive of public streets), if (a) the acquisition, construction, rehabilitation, repair or maintenance of such housing accommodations is, after July first, nineteen hundred fifty-five, financed in whole or in part by a loan, whether or not secured by a mortgage, the repayment of which is guaranteed or insured by the federal government or any agency thereof, or the State or County or any of its political subdivisions or any agency thereof, provided that such a housing accommodation shall be deemed to be publicly assisted only during the life of such loan and guaranty or insurance, or (b) a commitment, issued by a government agency after July first, nineteen hundred fifty-five, is outstanding that acquisition of such housing accommodations may be financed in whole or in part by a loan, whether or not secured by a mortgage, the repayment of which is guaranteed or insured by the federal government or any agency thereof, or the State or County or any of its political subdivisions or any agency thereof.
- S. *Real estate broker* shall mean any person, firm or corporation who, for another and for a fee, commission, or other valuable consideration, lists for sale, sells, at auction or otherwise, exchanges, buys or rents, or offers or attempts to negotiate a sale, at auction or otherwise,



exchange, purchase or rental of an estate or interest in real estate, or collects or offers or attempts to collect rent for the use of real estate, or negotiates or offers or attempts to negotiate, a loan secured or to be secured by a mortgage or other incumbrance upon or transfer of real estate. In the sale of lots pursuant to the provisions of article nine-a of the real property law, the term "real estate broker" shall also include any person, partnership, association or corporation employed by or on behalf of the owner or owners of lots or other parcels of real estate, at a stated salary, or upon a commission, or upon a salary and commission, or otherwise, to sell such real estate, or any parts thereof, in lots or other parcels, and who shall sell or exchange, or offer or attempt or agree to negotiate the sale or exchange, of any such lot or parcel of real estate.

T. *Real estate sales person* shall mean a person employed by a licensed real estate broker to list for sale, sell or offer for sale, at auction or otherwise, to buy or offer to buy or to negotiate the purchase or sale or exchange of real estate, or to negotiate a loan on real estate, or to lease or rent or offer to lease, rent or place for rent any real estate, or who collects or offers to or attempts to collect rent for the use of real estate for or on behalf of such real estate broker.

U. *Reasonable accommodation* shall mean such accommodation in rules, policies, practices, or services, when such accommodation may be necessary to afford equal opportunity to use and enjoy a housing accommodation that can be made and shall not cause undue hardship to the owner or owner's business. The owner or covered business shall have the burden of proving undue hardship. In making a determination of undue hardship, the factors that may be considered include but shall not be limited to:

1. The nature and cost of the accommodation;
2. The overall financial resources of the facility or facilities involved in the provision of the reasonable accommodation; the effect on expenses and resources, or the impact otherwise of such accommodation upon the operation of the facility; and
3. The architectural feasibility of providing such accommodation.

V. *Sexual orientation* shall mean heterosexuality, homosexuality, bisexuality or asexuality, whether actual or perceived. However, nothing contained herein shall be construed to protect conduct otherwise proscribed by law.

W. *Transaction* shall mean, for purposes of this [chapter] article, the sale, rental, lease, sublease, assignment, transfer, finance, refinance, loan, or appraisal and any and all other terms and conditions of any housing accommodation.

X. *Unlawful discriminatory real estate practice* includes only those practices specified in section [redacted] through section [redacted] of this article which occurred in Broome County.

Y. *Victim of domestic violence, sexual abuse or stalking:*

1. A victim of domestic violence shall mean:
 - (a) Any person who has been subjected to an act or series of acts that:



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- (i) Would constitute a misdemeanor, felony or other violation of law against the person as defined in state or federal law; or
 - (ii) Would constitute a misdemeanor, felony or other violation of law against property as defined in state or federal law.
 - (b) Such act or series of acts as defined in subdivision (a) must have been committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabiting with or has cohabited with the victim, by a person who is or who has been in a continuing social relationship of a romantic or intimate nature with the victim, or a person who is or has continually or at regular intervals lived in the same household as the victim.
 - (c) Such act or series of acts as defined in subdivision (a) and (b) must also;
 - (i) Result in the actual physical or emotional injury of the person whether or not such conduct has actually resulted in criminal charges, prosecution or conviction; or
 - (ii) Create a substantial risk of physical or emotional harm to such person whether or not such conduct has actually resulted in criminal charges, prosecution or conviction.
 2. A victim of sexual abuse or stalking shall mean any person who has been:
 - (a) A victim of an act or series of acts which would constitute a violation of Article 130 of the Penal Law;
 - (b) A victim of an act or series of acts which would constitute a violation of section 120.45, 120.50, 120.55, or 120.60 of the Penal Law.

A victim of domestic violence, sexual abuse or stalking shall also include any individual who is perceived to be a person who has been, or is currently being, subjected to acts or series of acts as set forth in subdivisions (1) and (2) above.

Sec. 251-3 Unlawful discriminatory real estate practices

A. It shall be an unlawful discriminatory real estate practice for the owner, lessee, sub-lessee, assignee, or managing agent of, or other person having the right to sell, rent, or lease a housing accommodation, including publicly assisted housing accommodations, constructed or to be constructed, or any agent or employee thereof:

1. To refuse to sell, rent, lease, or otherwise to deny to or withhold from any person or group of persons such a housing accommodation because of the race, creed, color, national origin, sexual orientation, gender identity or expression, military status, sex, age, disability, marital status, lawful source of income, or familial status of such person or persons, or to represent that any housing accommodation or land is not available for inspection, sale, rental or lease when in fact it is so available.
2. To discriminate against any person because of race, creed, color, national origin, sexual orientation, gender identity or expression, military status, sex, age, disability, marital status, lawful source of income, or familial status in the terms, conditions or privileges of



the sale, rental or lease of any such housing accommodation or in the furnishing of facilities or services in connection therewith.

3. To print or circulate or cause to be printed or circulated any statement, advertisement or publication, or to use any form of application for the purchase, rental or lease of such housing accommodation or to make any record or inquiry in connection with the prospective purchase, rental or lease of such a housing accommodation which expresses, directly or indirectly, any limitation, specification or discrimination as to race, creed, color, national origin, sexual orientation, gender identity or expression, military status, sex, age, disability, marital status, lawful source of income, or familial status, or any intent to make any such limitation, specification or discrimination.

The provisions of this paragraph (a) shall not apply (1) to the rental of a housing accommodation in a building which contains housing accommodations for not more than two families living independently of each other, if the owner resides in one of such housing accommodations, (2) to the restriction of the rental of all rooms in a housing accommodation to individuals of the same sex or (3) to the rental of a room or rooms in a housing accommodation, if such rental is by the occupant of the housing accommodation or by the owner of the housing accommodation and the owner resides in such housing accommodation or (4) solely with respect to age and familial status to the restriction of the sale, rental or lease of housing accommodations exclusively to persons sixty-two years of age or older and the spouse of any such person, or for housing intended and operated for occupancy by at least one person fifty-five years of age or older per unit. In determining whether housing is intended and operated for occupancy by persons fifty-five years of age or older, Sec. 807(b) (2) (c) (42 U.S.C. 3607 (b) (2) (c)) of the federal Fair Housing Act of 1988, as amended, shall apply.

B. It shall be an unlawful discriminatory practice for the owner, lessee, sub-lessee, assignee, or managing agent of, or other person having the right of ownership of or possession of or the right to rent or lease housing accommodations, including publicly assisted housing accommodations, constructed or to be constructed, or any agent or employee thereof:

1. To refuse to permit, at the expense of a person with a disability, reasonable modifications of existing premises occupied or to be occupied by the said person, if the modifications may be necessary to afford the said person full enjoyment of the premises, in conformity with the provisions of the New York state uniform fire prevention and building code except that, in the case of a rental, the landlord may, where it is reasonable to do so, condition permission for a modification on the renter's agreeing to restore the interior of the premises to the condition that existed before the modification, reasonable wear and tear excepted.

2. To refuse to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford said person with a



disability equal opportunity to use and enjoy a dwelling, including reasonable modification to common use portions of the dwelling, or

3. In connection with the design and construction of covered multi-family dwellings for first occupancy after March thirteenth, nineteen hundred ninety-one, a failure to design and construct dwellings in accordance with the accessibility requirements for multi-family dwellings found in the New York state uniform fire prevention and building code to provide that:

- a. The public use and common use portions of the dwellings are readily accessible to and usable by persons with disabilities;
- b. All the doors are designed in accordance with the New York state uniform fire prevention and building code to allow passage into and within all premises and are sufficiently wide to allow passage by persons in wheelchairs; and
- c. All premises within covered multi-family dwelling units contain an accessible route into and through the dwelling; light switches, electrical outlets, thermostats, and other environmental controls are in accessible locations; there are reinforcements in the bathroom walls to allow later installation of grab bars; and there are usable kitchens and bathrooms such that an individual in a wheelchair can maneuver about the space, in conformity with the New York state uniform fire prevention and building code.

C. It shall be an unlawful discriminatory practice for any real estate broker, real estate salesperson or employee or agent thereof or any other individual, corporation, partnership or organization for the purpose of inducing a real estate transaction from which any such person or any of its stockholders or members may benefit financially, to represent that a change has occurred or will or may occur in the composition with respect to the lawful sources of income for residents, race, creed, color, national origin, sexual orientation, gender identity or expression, military status, sex, disability, marital status, or familial status of the owners or occupants in the block, neighborhood or area in which the real property is located, and to represent, directly or indirectly, that this change will or may result in undesirable consequences in the block, neighborhood or area in which the real property is located, including but not limited to the lowering of property values, an increase in criminal or anti-social behavior, or a decline in the quality of schools or other facilities.

D. It shall be an unlawful discriminatory real estate practice for any real estate board, or any board of directors of any condominium corporation or cooperative apartment corporation, because of the actual or perceived group identity of any individual who is otherwise qualified for membership, to exclude or expel such individual from ownership of any unit or apartment or from membership on any such board, or to discriminate against such individual in the terms, conditions, and privileges of ownership of any unit or apartment or of membership on any such board.

E. It shall be an unlawful discriminatory practice for any real estate broker, real estate



salesperson or employee or agent thereof:

1. To refuse to sell, rent or lease any housing accommodation, land or commercial space to any person or group of persons or to refuse to negotiate for the sale, rental or lease, of any housing accommodation, land or commercial space to any person or group of persons because of the race, creed, color, national origin, sexual orientation, gender identity or expression, military status, sex, age, disability, marital status, lawful source of income, or familial status of such person or persons, or to represent that any housing accommodation, land or commercial space is not available for inspection, sale, rental or lease when in fact it is so available, or otherwise to deny or withhold any housing accommodation, land or commercial space or any facilities of any housing accommodation, land or commercial space from any person or group of persons because of the race, creed, color, national origin, sexual orientation, gender identity or expression, military status, sex, age, disability, marital status, lawful source of income, or familial status of such person or persons.

2. To print or circulate or cause to be printed or circulated any statement, advertisement or publication, or to use any form of application for the purchase, rental or lease of any housing accommodation, land or commercial space or to make any record or inquiry in connection with the prospective purchase, rental or lease of any housing accommodation, land or commercial space which expresses, directly or indirectly, any limitation, specification, or discrimination as to race, creed, color, national origin, sexual orientation, gender identity or expression, military status, sex, age, disability, marital status, lawful source of income, or familial status; or any intent to make any such limitation, specification or discrimination.

F. With respect to age and familial status, the provisions of this paragraph shall not apply to the restriction of the sale, rental or lease of any housing accommodation, land or commercial space exclusively to persons fifty-five years of age or older and the spouse of any such person, or to the restriction of the sale, rental or lease of any housing accommodation or land to be used for the construction or location of housing accommodations for persons sixty-two years of age or older, or intended and operated for occupancy by at least one person fifty-five years of age or older per unit. In determining whether housing is intended and operated for occupancy by persons fifty-five years of age or older, Sec. 807 (b)(2)(c) (42 U.S.C. 3607(b)(2)(c)) of the federal Fair Housing Act of 1988, as amended, shall apply.

G. It shall be an unlawful discriminatory practice for any real estate board, because of the race, creed, color, national origin, sexual orientation, gender identity or expression, military status, age, sex, disability, marital status, lawful source of income, or familial status of any individual who is otherwise qualified for membership, to exclude or expel such individual from membership, or to discriminate against such individual in the terms, conditions and privileges of membership in such board.

H. The provisions of this section, as they relate to age, shall not apply to persons under the age of 18 years.



Sec. 251-4 Unlawful discriminatory real estate practices in relation to credit.

A. It shall be an unlawful discriminatory practice for any creditor or any officer, agent or employee thereof:

1. In the case of applications for credit with respect to the purchase, acquisition, construction, rehabilitation, repair or maintenance of any housing accommodation, land or commercial space to discriminate against any such applicant because of the race, creed, color, national origin, sexual orientation, gender identity or expression, military status, age, sex, marital status, disability, or familial status of such applicant or applicants or any member, stockholder, director, officer or employee of such applicant or applicants, or of the prospective occupants or tenants of such housing accommodation, land or commercial space, in the granting, withholding, extending or renewing, or in the fixing of the rates, terms or conditions of, any such credit;

2. To discriminate in the granting, withholding, extending or renewing, or in the fixing of the rates, terms or conditions of, any form of credit, on the basis of race, creed, color, national origin, sexual orientation, gender identity or expression, military status, age, sex, marital status, disability, or familial status;

3. To use any form of application for credit or use or make any record or inquiry which expresses, directly or indirectly, any limitation, specification, or discrimination as to race, creed, color, national origin, sexual orientation, gender identity or expression, military status, age, sex, marital status, disability, or familial status;

4. To make any inquiry of an applicant concerning his or her capacity to reproduce, or his or her use or advocacy of any form of birth control or family planning;

5. To refuse to consider sources of an applicant's income or to subject an applicant's income to discounting, in whole or in part, because of an applicant's race, creed, color, national origin, sexual orientation, gender identity or expression, military status, age, sex, marital status, childbearing potential, disability, or familial status;

6. To discriminate against a married person because such person neither uses nor is known by the surname of his or her spouse. This paragraph shall not apply to any situation where the use of a surname would constitute or result in a criminal act.

B. Without limiting the generality of subdivision A of this section, it shall be considered discriminatory if, because of an applicant's or class of applicants' race, creed, color, national origin, sexual orientation, gender identity or expression, military status, age, sex, marital status or disability, or familial status:

1. An applicant or class of applicants is denied credit in circumstances where other applicants of like overall credit worthiness are granted credit, or

2. Special requirements or conditions, such as requiring co-obligors or reapplication upon marriage, are imposed upon an applicant or class of applicants in circumstances where similar



requirements or conditions are not imposed upon other applicants of like overall credit worthiness.

C. It shall not be considered discriminatory if credit differentiations or decisions are based upon factually supportable, objective differences in applicants' overall credit worthiness, which may include reference to such factors as current income, assets and prior credit history of such applicants, as well as reference to any other relevant factually supportable data; provided, however, that no creditor shall consider, in evaluating the credit worthiness of an applicant, aggregate statistics or assumptions relating to race, creed, color, national origin, sexual orientation, gender identity or expression, military status, sex, marital status or disability, or to the likelihood of any group of persons bearing or rearing children, or for that reason receiving diminished or interrupted income in the future.

D. It shall not be an unlawful discriminatory practice to consider age in determining credit worthiness when age has a demonstrable and statistically sound relationship to a determination of credit worthiness.

E. The provisions of this section, as they relate to age, shall not apply to persons under the age of eighteen years.

Sec. 251-5 Additional provisions defining discriminatory practices.

A. It shall be an unlawful discriminatory practice for any person to aid, abet, incite, compel or coerce the doing of any of the acts forbidden under this article, or to attempt to do so.

B. It shall be an unlawful discriminatory practice for any person engaged in any activity to which this section applies to retaliate or discriminate against any person because he or she has opposed any practices forbidden under this article or because he or she has filed a complaint, testified or assisted in any proceeding under this article.

C. Nothing contained in this section shall be construed to bar any religious or denominational institution or organization, or any organization operated for charitable or educational purposes, which is operated, supervised or controlled by or in connection with a religious organization, from limiting employment or sales or rental of housing accommodations or admission to or giving preference to persons of the same religion or denomination or from taking such action as is calculated by such organization to promote the religious principles for which it is established or maintained.

Sec. 251-6 Creation of a Fair Housing Advisory Board.

A. There is hereby created in the Broome County Planning Department a Fair Housing Advisory Board (hereinafter referred to as "Board"). Such Board shall consist of fifteen (15) members who shall be appointed by the County Executive, subject to confirmation by the County Legislature as set forth in the Laws of Broome County **Section _____**, one of whom shall be designated as Chairperson by the County Executive. The members and Chairperson



shall serve at the pleasure of the County Executive. Each Board member shall serve a term which parallels his or her renewable three (3) year term as a member of the Board.

B. A majority of members of the Board shall constitute a quorum for the purpose of conducting the business thereof. A vacancy on the Board shall not impair the right of the remaining members to exercise all the powers of the Board.

Sec. 251-7 Formulations of policies by the Board.

A. The Board shall formulate any and all policies necessary to effectuate the purposes of this article and may make recommendations to agencies and officers of the county in aid of such policies and purposes.

Sec. 251-8 Powers and duties of the Board.

The Board shall have the following functions, powers and duties:

A. To establish and maintain its principal headquarters at the office of the Broome County Planning Department.

B. To adopt, promulgate, amend and rescind suitable rules and regulations to carry out the provisions of this article and the policies and practices of the Board.

C. To facilitate collaboration in the adoption or adjustment of public policy and administrative protocol that promotes equitable access to safe, decent, affordable housing in Broome County

D. To engage in outreach with other communities successfully addressing comparable housing issues

E. To convene quarterly public forums for the purpose of soliciting community feedback

F. To support expansions of New York State Human Rights Law, as revised effective April twelfth two thousand and nineteen, by:

1. Developing referral protocol for assistance in initiating a discrimination assessment or complaint and the enforcement of private rights

2. Educating the public regarding the prohibitions against unlawful discriminatory real estate practices, as set forth in this article

3. Identifying unlawful discriminatory real estate practices as defined by this article and Executive Law

Sec. 251-9 Relations with county departments and agencies.

So far as practicable, and subject to the approval of the County Executive, the services of all county departments and agencies shall be made available by their respective heads to assist the Board with respect to matters within its jurisdiction. Upon reasonable request of the Board, the head of any department or agency shall, in so far as practicable,



provide the Board with public records in the possession of such department or agency to the Board, except that nothing herein shall compel the disclosure of public records which are exempt from disclosure pursuant to the provisions of the Public Officers Law.

Sec. 251-10 Jurisdiction

- A. The Board shall have jurisdiction in the County of Broome;
- B. The Board shall have the power to coordinate and collaborate with counties, municipalities, organizations and partnerships throughout the State of New York on issues of fair housing.

Sec. 251-11 Enforcement by private persons.

- A. Any person who claims to have been injured by an unlawful discriminatory real estate practice or who believes that he or she will be injured by an unlawful discriminatory real estate practice that is about to occur, may commence a civil action in the appropriate court of jurisdiction not later than three-years after the occurrence or the termination of an alleged unlawful discriminatory real estate practice, whichever occurs last, to obtain appropriate relief with respect to such unlawful discriminatory real estate practice.
- B. The computation of such three-year period shall not include any time during which an administrative proceeding under State or Federal law was pending with respect to a complaint or charge alleging an unlawful discriminatory real estate practice based on the same facts or occurrences.
- C. A complaint may be filed under this section without regard to the status of the charge, but if the U.S. Department of Housing and Urban Development has obtained a pre- finding or post-finding settlement or conciliation agreement with the consent of the charging party, no action may be filed under this section with respect to the alleged unlawful discriminatory real estate practice which forms the basis for such complaint except for the purpose of enforcing the terms of such agreement.
- D. In a civil action under this section, if the court finds that an unlawful discriminatory real estate practice has occurred or is about to occur, the court may grant as relief, as it deems appropriate, any permanent or temporary injunction, temporary restraining order, or other order, including an order enjoining the defendant from engaging in such practice or ordering such affirmative action as may be appropriate. The court may also award actual damages, including damages for humiliation and mental suffering, including but not limited to compensatory punitive and treble damages, and any other appropriate remedy set forth in the Federal Fair Housing Amendments Act (P.L. 100-430). The court may also allow reasonable attorney's fees and costs to the prevailing party.
- E. Relief granted under this section shall not affect any contract, sale, encumbrance, or lease consummated before the granting of such relief and involving a knowable bona fide purchaser, encumbrancer, or tenant, without actual notice of the filing of a charge or civil



action under this law.

Sec. 251-12 Separability.

If any clause, sentence, paragraph or part of this article or the application thereof to any person or circumstance shall, for any reason, be adjudged by a court of competent jurisdiction to be invalid, such judgment shall not affect, impair or invalidate the remainder of this article.

Sec. 251-13 Effect

This Local Law shall take effect upon filing with the Secretary of State and on MM/DD/2019.



APPENDIX B – REVISED RENT SUSPENSION NOTICE

**DSS RENT WITHOLDING NOTICE TO
LANDLORD & TENANT**

DATE: Click or tap to enter a date.

CASE #: Click or tap here to enter text.

Landlord: Click or tap here to enter text.

RE: Property Located At:

Click or tap here to enter text.

Tenant:

Click or tap here to enter text.

NOTICE TO LANDLORD

Dear Sir or Madam:

Effective Click or tap to enter a date. **this Agency will suspend rent payments directly to you, as Landlord, for the above recipient as the** Click or tap here to enter text. **Code Enforcement office has determined under Social Services Law § 143-b (*Spiegel Act*), there are code violations “dangerous, hazardous or detrimental to life or health” in the above-named unit or building. Payments may be resumed retroactively if you establish *Spiegel Act* compliance with Code.**



Social Services § 143-b (5) Protection from Eviction:

It shall be a valid defense in any action or summary proceeding against a welfare recipient for non-payment of rent to show existing violations in the building such welfare recipient resides which relate to conditions which are dangerous, hazardous or detrimental to life or health as the basis for non-payment.

A landlord shall not be entitled to an order or judgment awarding possession of the premises or providing for tenant removal, for non-payment of rent for any period during which there was outstanding any violation of law relating to dangerous or hazardous conditions or conditions detrimental to life or health.

NOTICE TO TENANT

This action by DSS to stop rent payments due to code violations in your apartment is considered a “Spiegel Law defense.” If your landlord attempts to take you to court or serves you with an eviction notice, you can contact Legal Services of Central New York (607-231-5988) or the Legal Aid Society of Mid-New York (607-231-5900) to seek help from an attorney. Bring this Notice with you when you speak to an attorney, or show it to the Judge when you go to court.

If you pay any portion of your rent directly to your landlord, speak to an attorney about whether you should continue to pay it or withhold it. If you do choose to withhold rent, you must save the money and be prepared to pay your landlord upon confirmation repairs have been completed.

WARNING

The above *Spiegel Act Notification* supersedes any previous arrangements which may exist with this Agency, and neither creates nor implies any contractual relationship with the Broome County Department of Social Services or any legal obligation of any kind on its behalf to you. In the event the above plan is terminated or altered, you will receive written notice. This *Spiegel Act Notification* does not create any Landlord Tenant relationship with Broome County Department of Social Services.

Sincerely,

Nancy J. Williams, LCSW-R

COMMISSIONER

R. Meattay

Head Social Welfare Examiner



ⁱ Students Identified as Homeless in academic years 2016-2017 & 2017-2018. *NYS Student Information Repository System*. Retrieved from <https://nysteachs.org/resources/data-on-student-homelessness-nys/>

ⁱⁱ National Low Income Housing Coalition. (2018). Tabulation of HUD's Comprehensive Housing Affordability Strategy data 2011-2015.

ⁱⁱⁱ National Low Income Housing Coalition. (2018). Tabulation of HUD's Comprehensive Housing Affordability Strategy data 2011-2015.

^{iv} Broome County Healthy Neighborhoods Program. (2018). Home Safety Survey Report

^v Broome County Health Department. (2017). Community Health Assessment 2013-2017. p4 Retrieved from <http://www.gobroomecounty.com/files/hd/cha/Broome%20County%20Community%20Health%20Assessment%202013-2017.pdf>

^{vi} National Low Income Housing Coalition. (2018). Tabulation of HUD's Comprehensive Housing Affordability Strategy data 2011-2015.