



STATE OF CONNECTICUT  
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES  
90 WASHINGTON STREET HARTFORD, CONNECTICUT 06106

TASK FORCE  
ON HOUSING  
IN CONNECTICUT

FIRST  
SUMMARY REPORT

October 8, 1987

Prepared by  
Sharon A. Scully  
Task Force Chairperson

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## INTRODUCTION

In April of 1986 the Commission on Human Rights and Opportunities (hereinafter CHRO) published a report entitled, Housing Discrimination And Opportunities In The State of Connecticut. This report was prepared following a series of fact-finding hearings which gathered evidence on the amount and types of housing discrimination in the state, as well as the effect economics and availability of affordable housing had on the citizens of Connecticut. The report contains twenty-four (24) findings of fact and twenty-three (23) recommendations, an outline of which is attached as Appendix A.

In July of 1986, the CHRO created a Task Force on Housing in Connecticut to address the findings and implement the recommendations contained in the report. The Task Force is comprised of government officials, state legislators, fair housing advocates, members of civic/community groups, and a representative from the Connecticut Association of Realtors.\*

In order to to "implement" the recommendations contained in the report, the Task Force first identified recommendations that were a priority; and second, identified which agencies, organizations or bodies of government were responsible for making the changes required by each recommendation. The Task Force then advised the appropriate authorities to implement specific recommendations.

By designating recommendations to appropriate authorities the Task Force accomplished two, and sometimes three things. First, the Task Force saw to it that the appropriate authorities had knowledge of the Housing Report and the relevant recommendations. Second, the Task Force was able to obtain a record of the authorities' responses. Third, the Task Force was able to motivate some authorities to take action on specific recommendations. For example, the Task Force itself had no authority to make the Real Estate Commission enact a regulation which would specifically prohibit the practice of steering. However, the Task Force could, and did, advise the Real Estate Commission to enact such a regulation. When the Real Estate Commission did not enact the regulation, the Task Force asked why and when will you do it. This sort of questioning made agencies accountable for their action or inaction, and provided a record for evaluation of performance. This paper, with the appendices, is the record.

The Task Force met five times in the period between July 30, 1986 and October 8, 1987. During that time frame the Task Force designated specific recommendations to the U. S. Department of Housing and Urban Development, the Connecticut Department of Housing, the Connecticut Real Estate Commission, the CHRO, the Connecticut Daily Newspaper Association and the Connecticut Federation of Fair Rent Commissions. This paper presents a summary of the aforementioned agencies' responses to the Task Force recommendations.

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\*A copy of the original membership list is attached as Appendix B.

## RECOMMENDATIONS & RESPONSES

### I. The U.S. Department of Housing and Urban Development (HUD) and The Connecticut Department of Housing (DOH)

On August 5, 1986 the Task Force presented the following five recommendations to HUD and DOH:

- H-1 Review selection criteria for public housing projects to determine if they have an adverse impact on protected classes.
- H-2 Review selection criteria of private developers that you award grants or other assistance to and monitor the developments created to ensure that they are providing fair housing.
- H-3 Repair and maintain the public housing projects in existence, some of which are in a state of severe disrepair.
- H-4 Create multi-bedroom housing units which are accessible to the physically disabled.
- H-5 Create rental units in small clusters at scattered sites, rather than building large projects.

The DOH responded by letter dated September 23, 1986, a copy of which is attached as Appendix C. Essentially, the letter stated that the DOH had already implemented strategies to deal with the problems that the recommendations sought to address. Ron Clymer represented the DOH at the Task Force meeting on September 24, 1986 and echoed the response outlined in the letter. However, Mr. Clymer did admit that the DOH did not have sufficient staff to monitor the Affirmative Fair Housing Marketing Plans that developers are required to submit. Therefore, the Task Force members concern that developers could circumvent their equal housing opportunity obligations was valid.

Hud responded to the Task Force recommendations by letter dated October 24, 1986, a copy of which is attached as Appendix D. Ben Little, A Fair Housing Opportunity Specialist at HUD elaborated on the written response at the January 21, 1987 meeting of the Task Force.

Ann Walton of the Connecticut Office of Protection and Advocacy (OPA) took exception to HUD's fourth response that there was not a demand for multi-bedroom units which are accessible to the physically-handicapped. (See letter) Ms. Walton said that her office frequently gets calls from people

who cannot find that type of unit. Mr. Little suggested that a record of those calls, and a survey of housing needs for the physically-disabled be undertaken by the OPA. Mr. Little said that without supporting data, HUD was not likely to change its needs assessment on multi-bedroom units which are accessible to the physically disabled. Ms. Walton said that she would recommend to the OPA that it coordinate efforts among several community groups to collect data for a housing needs assessment.

II. The Connecticut Real Estate Commission, a Division Of The Department Of Consumer Protection

On August 5, 1986 the Task Force presented the following three recommendations to the Real Estate Commission:

- R-1 Draft and enact a regulation which specifically prohibits the practice of steering.
- R-2 Require licensed real estate agents to take three additional hours of credit in fair housing law to fulfill their twelve hours of credit continuing education requirement.
- R-3 Mandate a license suspension or revocation hearing when a real estate broker or licensee has been adjudged to have violated the fair housing laws.

The Commission attempted to implement recommendations R-2 and R-3 by submitting the following legislative proposals:

- AN ACT TO MANDATE A LICENSE SUSPENSION OR REVOCATION WHEN A REAL ESTATE BROKER OR SALES MAN (SALESPERSON) HAS BEEN FOUND IN VIOLATION OF ANY LOCAL, STATE, OR FEDERAL FAIR HOUSING LAW.
- AN ACT TO INCREASE THE CLASSROOM HOURS OF STUDY FROM 12 to 15 HOURS SO THAT AN ADDITIONAL 3-HOUR MANDATORY FAIR HOUSING MODULAR WOULD BE REQUIRED OF EACH LICENSEE BIENNIALY, PRIOR TO RENEWAL OF THEIR REAL ESTATE LICENSE.

Mr. Larry Hannafin, Director of the Real Estate Commission discussed the proposals at several Task Force meetings and urged those present to support the proposals at public hearing. Unfortunately, the two proposals were not passed into legislation. Mr. Hannafin said that the proposals would be re-submitted in 1988.

The Task Force suggested that the Real Estate Commission avoid the legislative route in the future and enact all of the recommendations via regulation. Mr. Hannafin did not commit the Real Estate Commission to take this course of action on recommendations.

However, on September 24, 1986 Mr. Hannafin said that the Real Estate Commission regulations would be amended in the future to specifically prohibit steering (recommendation R-1). To date, this has not been done.

### III. The Connecticut Commission on Human Rights and Opportunities (CHRO)

The Task Force designated several recommendations to the CHRO. Four of the recommendations concerned the drafting of legislative proposals. The Task Force recommended that the CHRO enact two legislative proposals that would expand the protected classes under the Public Accommodations Act to 1) prohibit discrimination on the basis of lawful source of income, and 2) to prohibit discrimination on the basis of past or present history of mental illness. The Task Force also wanted the CHRO to amend the Act Prohibiting Discrimination Against Families With Children in order to limit the exemptions in that law. Finally, the Task Force recommended that the CHRO get clear statutory authority to award emotional distress damages in housing cases.

The CHRO responded to these recommendations by submitting four legislative proposals, entitled:

- AN ACT PROHIBITING DISCRIMINATION IN PUBLIC ACCOMMODATIONS ON THE BASIS OF LAWFUL SOURCE OF INCOME.
- AN ACT PROHIBITING DISCRIMINATION IN PUBLIC ACCOMMODATIONS ON THE BASIS OF PRESENT OR PAST HISTORY OF MENTAL DISORDER.
- AN ACT CONCERNING DISCRIMINATION AGAINST FAMILIES WITH CHILDREN IN RENTAL HOUSING.
- AN ACT CONCERNING THE AUTHORITY OF THE COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES TO AWARD COMPENSATORY DAMAGES IN DISCRIMINATORY PRACTICES CASES.

These proposals were designed to effectuate the Task Force recommendations. Unfortunately, the legislature did not act on any of these proposals and they did not become law. However, the Connecticut Superior Court did decide two cases in 1987 which interpreted the CHRO's statutory authority, and decided that the Commission Hearing Officers do have authority to award emotional distress damages in hearing cases. This eliminates the need to change the language in the law regarding compensatory damages, since the law has been interpreted favorably.

The Task Force recommended that the CHRO implement a fair housing testing program, which the CHRO has done. A memorandum describing the testing program is attached as APPENDIX E.

Lastly, the Task Force recommended that the CHRO expand efforts to educate the public as to their fair housing rights. On July 30, 1986 Arthur Green, Director of the CHRO reported that financial constraints limited the agency's ability to expand outreach efforts.

The Task Force suggested that the CHRO create public service announce-

ments that could be aired free by radio and TV stations. Mr. Green said that the CHRO had in fact created radio and television public service announcements and distributed them to stations. The problem with public service announcements is that they are aired sporadically and often at times when there is a small audience. Mr. Green said that the Commission would continue its outreach efforts via speaking engagements, and distribution of fair housing materials.

In August 1987 HUD solicited bids for Fair Housing Assistance projects. The CHRO submitted a proposal for approximately one hundred-thousand dollars (\$100,000) to be used for the development and implementation of a multi-media outreach and education program that will heighten public awareness of fair housing rights and responsibilities. This was a competitive bid proposal and the CHRO does not know whether HUD will approve it and grant the funds. A decision is not expected from HUD until January of 1988.



IV. The Connecticut Daily Newspaper Association (CDNA)

In the report on Housing Discrimination And Opportunities In The State Of Connecticut, the CHRO made the following finding of fact:

Newspaper Ads Which Specify "Adults Only", "Adults Preferred" And "No Children" Often Contribute To And Foster Discrimination Against Families With Children.

The Task Force requested that the Connecticut Daily Newspaper Association take an active role in equal housing opportunity, by advocating that its members:

1. Refuse to accept ads which indicate either directly or through euphemisms, that it is acceptable to discriminate against families with children.
2. Publish a fair housing statement in the classified ads section, whenever ads pertain to the rental or sale of housing property.

Copies of significant correspondence between the Task Force and CDNA is attached as Appendix F.

The CDNA responded to the above recommendations by: 1) circulating to its membership a copy of the law which prohibits Discrimination Against Families With Children In The Rental of Dwellings (Conn. Gen. Stat. Sec. 46a-64a) and 2) circulating to its membership a Fair Housing notice which makes explicit reference to that law.

The CDNA did not take any action on the recommendation that newspapers should refuse to accept ads with restrictive language pertaining to children. To illustrate that this language may be illegal, two members of the Task Force called in response to a newspaper advertisement which specified "adults". The first caller pretended to have a child and was told virtually nothing about the units. (See Appendix F). The second caller said she was looking for an apartment for her husband and herself. The second caller was able to obtain information about the rent and size of the building. The apartment building had 30 units. This means that it was not an exempt building under Conn. Gen. Stat. Sec. 46a-64a, and that the agent's refusal to rent to a family with a child was in violation of the law. The Task Force maintains that the publisher of the ad was also culpable.

The CDNA is having its annual meeting on October 21, 1987 and has plans to discuss the Task Force recommendations once again.

V. The Connecticut Federation of Fair Rent Commissions

In the Housing Report, a recommendation had been made that:

Each municipality with Rental Properties Should Have  
A Fair Rent Commission To Provide A Forum For Resi-  
dents Faced With Excessive Rental Charges.

Originally the Task Force planned to designate that recommendation to municipalities without fair rent commissions. It soon became apparent that this was not a feasible course of action. Municipalities that turned a deaf ear to similar recommendations from resident fair housing advocates were even less likely to respond to an autonomous Task Force recommendation.

A major problem that local fair housing advocates face when attempting to establish fair rent commissions is that there is a lack of information on the operation and effectiveness of the commissions that are in existence.

The Task Force approached the Connecticut Federation of Fair Rent Commissions at its annual meeting on November 13, 1986 with the recommendation that it collect data from its members on the operation and performance of the existing commissions. This data would enable the Federation or the Task Force to write a model of operation that could be utilized by advocates who are trying to establish Fair Rent Commissions. The Federation was to vote on this and decide a course of action. The Task Force never received written materials from the Federation or its individual members. The result is that a model of operation was not developed.

## CONCLUSION

The success of the Task Force on Housing in Connecticut cannot be measured by the total number of recommendations that got implemented, because the Task Force had no authority to implement any of them. Success can only be measured by the amount of effort taken to advocate that the recommendations be adopted by appropriate authorities. This paper stands as a record of those efforts, but the record is not complete, because the struggle is not over.

On October 8, 1987 the Task Force voted to continue its existence and operation for another year, with Sharon Scully as the Chairperson. The Task Force on Housing in Connecticut will continue to map out legislative strategies, provide a forum for the exchange of ideas and assume an advocacy role in 1988.

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APPENDIX A

## II. DISCUSSION OF THE FINDINGS OF FACT

The findings of fact were adduced as follows. All testimony gathered at the fact-finding hearings on Housing Discrimination and Opportunities in Connecticut was transcribed. The written transcript was reviewed page by page. Witnesses' statements were divided into issues. Testimony related to issues was collected together and read again for consistency, persuasiveness, and relevancy to the purpose of the hearings. Exhibits were then included for review. Finally, where a collection of testimony and exhibits was persuasive, consistent, and relevant, a finding was made. There was no rigorous cross examination of witnesses and no authentication of exhibits submitted. However, the witnesses who testified took an oath to tell the truth. All of the testimony and exhibits were very carefully analyzed before the findings were made.

For ease in reading, the findings were separated into subtitles which define the subject of inquiry. Each finding of fact will be individually discussed in this chapter. Below is an outline of the findings of fact in the order in which they will be discussed.

THE COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES  
MAKES THE FOLLOWING FINDINGS OF FACT  
REGARDING HOUSING DISCRIMINATION AND OPPORTUNITIES  
IN CONNECTICUT:

A. ON RACIAL AND ETHNIC DISCRIMINATION:

- A-1. Steering by real estate agents in both the selling and rental of property is a serious problem in Connecticut.
- A-2. In the private sector, landlords discriminate by screening out rental applicants over the phone who sound Hispanic or Black.
- A-3. Blacks who are able to get through the various screening devices are often rejected on sight.

A-4. Discriminatory steering and screening practices prevent minorities from renting property in predominately white neighborhoods, which reinforces segregated housing patterns.

B. ON DISCRIMINATION AGAINST FAMILIES WITH CHILDREN:

B-1. Many people, both landlords and tenants do not know that it is illegal to discriminate against families with children.

B-2. Newspaper ads which specify "Adults Only", "Adults Preferred", and "No Children" often contribute to and foster discrimination against families with children.

B-3. Families with children are overtly discriminated against.

C. ON DISCRIMINATION AGAINST WOMEN:

C-1. Female single heads of household are the group most heavily impacted by discrimination against families with children.

C-2. Sexual harassment is a form of housing discrimination practiced against women.

D. ON DISCRIMINATION AGAINST THE PHYSICALLY DISABLED OR MENTALLY IMPAIRED:

D-1. There is a shortage of housing which accommodates the physically disabled and their families.

D-2. There is strong resistance in Connecticut to group homes for the mentally disabled and mentally retarded.

D-3. There is a gap in Connecticut's public accommodations statute because it does not protect individuals with a past or present history of mental illness.

E. ON DETECTING DISCRIMINATION:

E-1. The number of housing discrimination complaints filed does not accurately reflect the amount of discrimination which exists.

E-2. There are several reasons why people who have been discriminated against do not file complaints.

E-3. Discriminatory steering and screening practices are difficult to detect because they are so subtle, and the subtlety of the discrimination is a major reason why victims do not file complaints.

E-4. Testing is an excellent way to uncover discrimination.

F. ON ECONOMIC FACTORS IN DISCRIMINATION:

- F-1. There is a severe shortage of low and moderate income rental property in Connecticut.
- F-2. The shortage of low-income rental property forces poor people to live in substandard, dilapidated housing.
- F-3. There is discrimination against tenants who receive public assistance.
- F-4. Public housing projects are not meeting the needs of poor people.

G. ON ZONING:

- G-1. The exclusionary planning and zoning activities of suburban towns severely limit the housing choices for members of protected classes.

H. ON DAMAGES AWARDS IN CHRO CASES:

- H-1. There is a disparity between housing discrimination awards rendered by the Commission and damage awards for similar cases in the federal courts.
- H-2. The Commission needs clear, unambiguous statutory authority to award emotional distress damages in housing discrimination cases.
- H-3. The provision of the Public Accommodations Act which sets the maximum double damages award which a court can award in a housing discrimination case at \$500.00 is too low.

### III. DISCUSSION OF RECOMMENDATIONS

The findings of fact help define the scope of the problem of housing discrimination and lack of housing opportunities in Connecticut. The following recommendations are suggested as a means of redressing some of the problems uncovered in the findings of fact. There are nine recommendations directed to the General Assembly; four recommendations directed to municipalities; five recommendations directed to HUD and the State Department of Housing; three recommendations directed to the Real Estate Commission; and two recommendations directed to the Commission on Human Rights and Opportunities. These recommendations which are outlined below, will be discussed individually in this chapter.

THE COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES  
MAKES THE FOLLOWING RECOMMENDATIONS  
REGARDING HOUSING DISCRIMINATION AND OPPORTUNITIES  
IN CONNECTICUT:

TO THE GENERAL ASSEMBLY:

1. Provide adequate funding and staff to the CHRO for the implementation of a comprehensive testing program.
2. Enact legislation which would prohibit discrimination in public accommodations on the basis of lawful source of income.
3. Draft and enact legislation which would prohibit discrimination in public accommodations on the basis of past or present history of mental illness.
4. Draft and enact "anti-snob" zoning legislation which specifically requires each municipality to zone a certain amount of land for the development of multi-family dwellings for low and moderate income families.
5. Draft and enact legislation requiring Connecticut newspapers which publish advertisements for the rental or sale of property to print a fair housing statement apprising readers of their rights.



6. Enact legislation to increase the double damages figure for discrimination in Public Accommodations.
7. Enact legislation which specifically gives the CHRO the authority to award emotional distress damages in housing discrimination cases.
8. Draft and enact legislation which would specifically prohibit sexual harassment in the rental of housing.
9. Amend the Act Prohibiting Discrimination Against Families With Children in the rental of housing so that the exemption is limited to an owner-occupied, two-family building.

TO MUNICIPALITIES:

1. Require more aggressive building code enforcement.
2. Each municipality with rental properties should have a fair rent commission to provide a forum for residents faced with excessive rental charges.
3. Each municipality should zone a certain amount of land for the development of multi-family dwellings for low and moderate income families.
4. Cities with a housing shortage should require commercial developers who convert housing into commercial or business uses to either: 1) contribute a part of their profit to a trust fund for the development of multi-family housing or 2) replace the lost housing units within the municipality. This requirement should also apply to developers who convert low-income housing into high-rent housing, thereby displacing the low-income residents.

TO THE DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT AND THE STATE DEPARTMENT OF HOUSING:

1. Review selection criteria for public housing projects to determine if they have an adverse impact on protected classes.
2. Review selection criteria of private developers that you award grants or other assistance to and monitor the developments created to ensure that they are providing fair housing.
3. Repair and maintain the public housing projects in existence, some of which are in a state of severe disrepair.
4. Create multi-bedroom housing units which are accessible to the physically disabled.
5. Create rental units in small clusters at scattered sites, rather than building large projects.

TO THE REAL ESTATE COMMISSION:

1. Draft and enact a regulation which specifically prohibits the practice of steering:
2. Require licensed real estate agents to take three additional hours of credit in fair housing law to fulfill their twelve hours of credit continuing education requirement.
3. Mandate a license suspension or revocation hearing when a real estate broker or licensee has been adjudged to have violated the fair housing laws.

TO THE COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES:

1. Implement a Testing Program.
2. Expand efforts to educate the public as to their fair housing rights.

APPENDIX B

TASK FORCE ON HOUSING IN CONNECTICUT  
MAILING LIST

September, 1986

Designees:

1. FEDERAL AGENCY

Mr. William Hernandez, Manager  
United States Department of Housing  
and Urban Development  
1 Hartford Square West  
Hartford, Connecticut 06106

2. STATE AGENCIES

Ms. Fredrica Gray, Director  
State of Connecticut  
Permanent Commission on the Status of Women  
90 Washington Street  
Hartford, Connecticut 06106

Linda Poltorak

Mr. Eliot J. Dober, Executive Director  
State of Connecticut  
Office of Protection and Advocacy for Handi-  
capped and Developmentally Disabled Persons  
90 Washington Street  
Hartford, Connecticut 06106

Ann Walton

Mr. Orest Dubno  
Executive Director  
Connecticut Housing Finance Authority  
40 Cold Spring Road  
Rocky Hill, Connecticut 06067

Philip Johnson

Ms. Mary Heslin, Commissioner  
State of Connecticut  
Department of Consumer Protection  
Real Estate Commission  
165 Capitol Avenue  
Hartford, Connecticut 06106

Larry Hanafin

The Honorable Joseph I. Lieberman, Attorney  
Attorney General  
State of Connecticut  
Office of the Attorney General  
30 Trinity Street  
Hartford, Connecticut 06106

Gordon Hall  
(David Teed)

STATE AGENCIES (CONT'D)

Mr. Anthony V. Milano, Secretary  
State of Connecticut  
Office of Policy and Management  
80 Washington Street  
Hartford, Connecticut 06106

Mr. Joseph Canale, Commissioner  
State of Connecticut  
Department of Housing  
1179 Main Street  
Hartford, Connecticut 06103

3. LEGISLATORS

The Honorable Eric Coleman  
State Representative, 1st District  
77 Wintonbury Avenue  
Bloomfield, Connecticut 06002

The Honorable Thomas Dudchik  
State Representative, 104th District  
75 Howard Avenue  
Ansonia, Connecticut 06401

The Honorable Amelia Mustone  
State Senator, 13th District  
P.O. Box 246  
Meriden, Connecticut 06450

4. ASSOCIATIONS/ORGANIZATIONS

Mr. Ben Andrews, Jr., President  
State Conference - NAACP  
c/o City Council  
City Hall  
550 Main Street  
Hartford, Connecticut 06103

Mr. Cesar A. Batalla, Chairman  
Spanish American Coalition  
c/o Cesar Batalla  
Southern Connecticut Gas Company  
880 Broad Street  
Bridgeport, Connecticut 06604

Designees:

Joan Maloney

Michael T. Duppy  
Marcie Lopez  
(Ronald Clymer)  
(Al Bingham)

Carmen Orozco  
Council of Concern  
Housing Development Corp.  
Meriden, Connecticut

ASSOCIATIONS/ORGANIZATIONS (cont'd)

Mr. John Saunders, III  
Executive Director  
Urban League of Greater Hartford, Inc.  
1229 Albany Avenue  
Hartford, Connecticut 06112

Mr. Joseph Wincze, Jr., Chairman  
Fair Housing Association of Connecticut  
45 Lyon Terrace  
Bridgeport, Connecticut 06604

Ms. Alberta Richetelle  
Connecticut Coordinating Committee on  
the Handicapped  
c/o 2420 Harbor View Drive  
Rocky Hill, CT 06067

Ms. Diane Goldsmith  
Education Director  
Connecticut Women's Educational and Legal Fund  
22 Maple Avenue  
Hartford, Connecticut 06114

Ms. Margaret Dignoti, Executive Director  
Connecticut Association for Retarded Citizens  
15 High Street  
Hartford, Connecticut 06103

Ms. Cori DiAugustino, Chairperson  
Equal Opportunity Committee of Connecticut  
Association of Realtors  
Post Office Box 495  
Enfield, Connecticut 06082-0495

Ms. Diana Crouse, Director  
Fair Rent Commission  
Town of Stamford  
175 Atlantic Street  
Stamford, Connecticut 06901  
(Fair Housing Association of CT)

Designees (cont'd)

William S. Spencer

Marvin Kay  
Fair Housing Specialist  
Town of West Hartford  
28 South Main Street  
West Hartford, CT 06107

Martin Lagault  
Executive Director

APPENDIX C



# STATE OF CONNECTICUT

## DEPARTMENT OF HOUSING

September 23, 1986

Ms. Sharon Scully  
Chairperson  
Task Force on Housing  
in Connecticut  
90 Washington Street  
Hartford, CT 06106

Re: Task Force on Housing in Connecticut

Dear Ms. Scully:

This letter is in response to your request on August 5, 1986 for a written outline of the actions we have and/or will take to implement specific recommendations which were extracted from the Commission's Report on Housing Discrimination and Opportunities in the State of Connecticut.

- H-1 Review selection criteria for public housing projects to determine if they have an adverse impact on protected classes.
- H-2 Review selection criteria of private developers that you award grants or other assistance to and monitor the developments created to ensure that they are providing fair housing.

Developers participating in Department programs are required to submit an Affirmative Fair Housing Marketing Plan. This plan should identify the various racial groups least likely to apply for housing in the specific project area. It should also state the steps to be taken to affirmatively market the units and the number of units targeted to the racial groups identified as least likely to apply. This plan is reviewed by the Affirmative Action Office. The developers records are reviewed at a later date for compliance with the plan.

For federally-funded programs, grantees are required to submit an Affirmative Marketing Plan, and a fair housing policy.

In addition to the above, Housing Authorities are requested yearly to submit to us a breakdown by race and sex of their tenants and waiting list.

- H-3 Repair and maintain the public housing projects in existence, some of which are in a state of severe disrepair.



Ms. Sharon Scully  
Page 2

The Moderate Rental Rehabilitation Program provides grants-in-aid and loans to housing authorities for the rehabilitation of rental housing for elderly and moderate income persons and families.

Since July 1, 1983, this program has allocated \$22,614,578.00 for rehabilitation work at 75 housing authorities on approximately 14,000 units.

Two block grants have also been utilized during the time period since July 1, 1983. The insulation block grant of \$785,000 has provided programs for 48 housing authorities to date. The smoke detector block grant of \$3,650,000 has provided programs for 64 housing authorities to date.

The maturation of the Moderate Renewal Rehabilitation Program since 1983 has been an important response to the housing needs of Connecticut's elderly and moderate income persons and families and a vital part of the State's housing strategy to preserve existing housing structures.

**H-4 Create multi-bedroom housing units which are accessible to the physically disabled.**

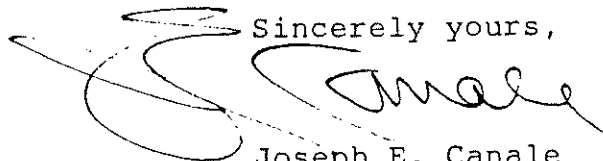
DOH practice is to provide to the extent possible for a mix of bedroom sizes in its developments. Additionally, 10% of all units must be accessible to the physically disabled.

**H-5 Create rental units in small clusters at scattered sites, rather than building large projects.**

DOH has done and will continue to provide financial assistance for scattered site projects. The most recent example is Kensington Square II in New Haven. The size of any project depends entirely upon the number of units approved locally, the availability of State financial assistance and the cost effectiveness of the proposed project from a development and management perspective.

I hope this information will be of use to your organization. If I can be of any further assistance, please do not hesitate to contact me.

Sincerely yours,



Joseph E. Canale  
Commissioner

JEC/MCS/lem

APPENDIX D



OCT 24 1986

Ms. Sharon Scully  
Chairperson  
Task Force on Housing in Connecticut  
90 Washington Street  
Hartford, CT 06106

Dear Ms. Scully:

This is in reply to the five recommendations directed to HUD by the Task Force on Housing.

In attempting to reply to each of the five recommendations we encountered some definitional problems which we have interpreted so that our reply could be read in its proper context.

1. Review selection criteria for public housing projects to determine if they have an adverse impact on protected classes. Public Housing Projects are not meeting the needs of poor people.  
The definitional problems encountered were:

a. Public Housing - When we speak of Public Housing we generally refer to housing owned or operated by a public body, such as a State, County, municipality. When we include privately owned and operated Federally assisted housing we generally speak of assisted housing.

b. Selection criteria for projects. We generally think of this term in relation to the selection of the site for the housing. We generally refer to tenant selection in terms of the admission policies promulgated by the public or the private owners.

c. Protected classes. We generally think of statutorily protected classes in relation to race, creed, color, national origin, ancestry, sex, marital status, age, handicap, and parenthood.

d. Needs of Poor People. This concept needs a precise definition. We generally think in terms of family income levels in relation to the average income of the community, without any connection to statutorily protected classes.

We have restated Task Force recommendations 1 and 2 to enable us to provide an appropriate reply.

1.62. HUD should review the tenant admissions policies of public and private owners of units receiving Federal housing assistance to determine if the policies meet Federal statutory requirements.

Comment: The review of tenant admissions policies of public and private owners for units and tenants receiving Federal housing assistance is a regulatory requirement which HUD performs on a predetermined schedule.

HUD generally requires that when Federally assisted housing units are sold, they remain available to income eligible tenants.

Federally assisted public housing tenant selection and admissions criteria is defined in 24 CFR 960.204, 205. Basically, public owners of Federally assisted units must consider individual family needs and statutory purpose of public housing. Generally the criteria (1) must avoid concentration of minorities; (2) preclude admission of tenants with bad habits; (3) insure broad range of income; (4) must be objective and reasonable; (5) cannot exclude unwed mothers; (6) cannot be based on stereotypes; (7) must be consistent with public owners responsibilities as a public body; (8) must be consistent with State and local tenant-landlord relations laws.

The criteria for selection and admission of assisted tenants in private units participating in Federally assisted housing programs is generally described in 24 CFR 880.603, and 24 CFR 812 and 813. All owners must submit to HUD for approval their affirmative fair housing marketing objectives and an affirmative Fair Housing Marketing Plan (24 CFR 200.600).

In general the HUD criteria upon which public and private owners base their admissions policies, is the same.

3. Repair and Maintain the Public housing projects in existence, some of which are in a state of severe disrepair.

HUD does not generally own or operate any public or private housing. The Congress of the United States does provide a limited amount of modernization loans to assist public and private owners with Federally assisted units in their maintenance programs.

In Connecticut HUD has assisted the State Housing Department and local public owners by providing Federal loan and subsidies for the acquisition, repair and maintenance of previously State financed moderate income projects in Bridgeport, New Haven, Hartford, and Meriden so the units could be made available to eligible low and lower income families.

4. Create Multi-Bedroom Housing units which are accessible to the physically handicapped. The Congress of the United States has provided subsidies for the development of such units in both the Low Rent Public Housing program (U.S. Housing Act of 1937) and Sec. 202 (Housing Act of 1959). However, our experience has shown that the demand has never been heavy for this type of unit. Federal law requires that all new buidings be designed for access by the handicapped.

5. Create rental units in small clusters at scattered sites, rather than building large projects. This is an age old debate. Our experience has shown that scattered site programs cost considerably more to manage and maintain. Accordingly, it becomes a political budget issue to be addressed by the elected officials at each level of government. Further, our experience has also shown that large or small, public or private, success in the management of housing projects is directly related to the quality of the professional management team employed by the public or private owners.

Mr. Little will elaborate on these points at your meeting.

Sincerely,



William H. Hernandez, Jr.  
Manager

cc: Mr. Ben Little

APPENDIX E



STATE OF CONNECTICUT  
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES  
90 WASHINGTON STREET HARTFORD, CONNECTICUT 06106

IN REPLY:  
566-7108  
566-3350

M E M O R A N D U M

TO: Members of Task Force on Housing and Other Interested Parties

FROM: Sharon A. Scully, Task Force Chairperson  
and CHRO Testing Coordinator

RE: CHRO Fair Housing Testing Programs

DATE: January 21, 1987

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The Commission on Human Rights and Opportunities (CHRO) has received a grant award from the United States Department of Housing and Urban Development (HUD) to conduct two Fair Housing Testing programs. The Commission plans to initiate an INVESTIGATIVE TESTING PROGRAM in the Greater Hartford area; and an AUDIT TESTING TRAINING PROGRAM throughout Connecticut. THE SUCCESS OF THESE PROGRAMS IS DEPENDENT UPON THE PARTICIPATION OF THE PEOPLE OF THE STATE OF CONNECTICUT, WHO ARE NEEDED AS VOLUNTEER TESTERS AND AUDIT TEST ORGANIZERS. Anyone interested in participating in the Commission's Fair Housing Testing effort should call me at 566-7108 or 566-3350.

What is Testing in Fair Housing  
Law Enforcement?

Testing is the process of having persons pose as homeseekers to detect unlawful discrimination in the furnishing of housing or housing services. The persons who pose as homeseekers are called "testers" and they have no interest in obtaining the house or housing-related service for which they have applied.

Why Test?

Housing discrimination is widely practiced in Connecticut. However, it has become so subtle that it is difficult to detect or prove. Testing is useful in establishing evidence of discrimination where other evidence is absent due to the subtlety and disguised nature of the discriminatory practice.

### Investigative Testing and the CHRO Approach

An INVESTIGATIVE TEST is one that is performed after a bona fide home-seeker has filed a complaint alleging housing discrimination on the basis of race, color, religion, sex or national origin. To determine if the complainant was unlawfully discriminated against, a tester, claiming virtually the same personal, social, economic and familial status as the complainant, will apply for the same housing or housing-related service. The only difference between the complainant and the tester is the variable that is being tested. For example, if the complainant is a Black male who alleges discrimination on the basis of race, the tester will be a White male. The way that the White tester was treated is compared to the way the Black complainant was treated. The results may constitute evidence of whether or not discrimination has occurred. Investigative testing is a very quick and efficient method of gathering evidence in a housing discrimination complaint.

The CHRO plans to use investigative testing in the greater Hartford area as a demonstration project. This will enable CHRO staff to closely monitor, assess, and improve upon the basic program prior to state-wide implementation, which is anticipated. Implementation of the Hartford-area program will generate evidence that will facilitate the investigation of individual complaints. Findings of reasonable cause should be strengthened and CHRO's investigative resources will be more efficiently utilized. The quality of the CHRO's investigations will be improved and the speed with which such investigations are conducted should increase. Greater monetary awards and fuller additional remedies in particular cases should also result.

The knowledge that the CHRO possesses testing resources and knows how to use them will deter future fair housing violations in the greater Hartford area, and eventually, throughout the state. Persons claiming to be aggrieved by discrimination will be encouraged to enlist the services of the CHRO because they will know that the agency has the capacity to quickly investigate housing discrimination complaints, prove discrimination, and provide adequate relief.

To summarize, the CHRO anticipates that its investigative testing program will: 1) improve complaint processing, 2) result in more cause findings, 3) result in better remedies, 4) increase the filing of complaints, and 5) deter incidents of discrimination. Moreover, success in the Hartford area pilot program will showcase the utility of investigative testing, and will give the CHRO strong evidence with which to seek additional funds for the implementation of a state-wide program.

### Audit Testing and the CHRO Approach

In an AUDIT Test, two testers can apply for the same housing or housing related service, within a short period of time of each other. The two testers report having the same personal, social, economic and familial status. The only difference between the two people is the variable that is being



Memorandum to Members of Task Force on Housing  
and Other Interested Parties

January 21, 1987

Page 3.

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tested. For example, if sex discrimination is being tested, one tester would be male and the other would be female. Audit surveys are targeted at specific segments of the housing market, such as real estate brokers or apartment complexes, to determine if unlawful discrimination is being practiced. The results of audit tests are utilized to determine whether a complaint of discrimination should be initiated by the testers or Commission to remedy any discriminatory practices found.

The CHRO will not conduct audit tests, but will be training non-profit groups how to conduct audit test surveys. The audit training program will emphasize the training of trainers, rather than the training of testers. By training non-profit organizations' employees, officials, officers, and active volunteers how to test and how to train audit testing, the CHRO hopes to provide these organizations with the technical assistance necessary for them to carry out successful, independent, and on-going testing programs.

The CHRO will train non-profit organizations to audit for enforcement or litigation purposes on the following class bases: race, color, religion, sex or national origin. Positive test results will be brought to the attention of the CHRO testing Coordinator, who will evaluate the evidence and recommend the initiation of Commission charges when the tests were conducted according to CHRO standards and are conclusive on the issues of discrimination. Subtle forms of discrimination, such as steering and screening will be identified, and the CHRO's ability to receive, initiate and process systemic housing complaints should be enhanced.

Like the investigative testing program, the CHRO expects the auditing program to have a deterrent effect on would-be discriminators. Knowledge that auditing surveys are being conducted throughout the state by several non-profit groups, and that CHRO charges are being initiated, should deter future fair housing violations.

To summarize, the CHRO anticipates that its audit testing program will: 1) result in the implementation of auditing surveys, 2) increase identification of screening, steering, and other subtle forms of discrimination, 3) increase initiation of systemic complaints, 4) deter incidents of discrimination, 5) strengthen the relationship between local fair housing groups and the CHRO, thereby enhancing outreach efforts. The CHRO also hopes that its audit training program will result in the continual use of audit surveys by fair housing groups.

#### Conclusion

The success of investigative testing in Greater Hartford and state-wide audit testing is dependent upon the public's participation. If you or your organization want to get involved in the CHRO testing effort, please call me at 566-7108 or 566-3350.

APPENDIX F



STATE OF CONNECTICUT  
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES  
90 WASHINGTON STREET HARTFORD, CONNECTICUT 06106

IN REPLY  
566-7108

March 23, 1987

Mr. Charles Iwanaki, Secretary/Treasurer  
Connecticut Daily Newspaper Association  
c/o The Record Journal  
11 Crown Street  
Meriden, Connecticut 06450

Dear Mr. Iwanaki:

RE: The publication of a fair housing statement by newspapers which publish advertisements for the rental or sale of property.

A Task Force on Housing in Connecticut was created by the Commission on Human Rights and Opportunities to implement the recommendations contained in the Commission's Report on statewide housing discrimination and lack of housing opportunities. The Report was prepared following a series of fact-finding hearings which gathered evidence on the amount and types of housing discrimination in the state, and ascertained the effect economics and availability of affordable housing had on the citizens of Connecticut. The Report contains twenty-four findings of fact, one of which is:

NEWSPAPER ADS WHICH SPECIFY "ADULTS ONLY", "ADULTS PREFERRED" AND "NO CHILDREN" OFTEN CONTRIBUTE TO AND FOSTER DISCRIMINATION AGAINST FAMILIES WITH CHILDREN.

A complete discussion of the above finding of fact is attached for your review. The Report also contains twenty-three recommendations. The following recommendation was made in order to remedy false impressions created by restrictive newspaper ads:

DRAFT AND ENACT LEGISLATION REQUIRING CONNECTICUT NEWSPAPERS WHICH PUBLISH ADVERTISEMENTS FOR THE RENTAL OR SALE OF PROPERTY TO PRINT A FAIR HOUSING STATEMENT APPRISING READERS OF THEIR RIGHTS.

The publication of fair housing statement by newspapers would go a long way toward educating the public about equal housing opportunity.

At a recent meeting, the Task Force decided not to "implement" the above recommendation by immediately turning to the Legislature. A decision was made to seek voluntary compliance from Connecticut's newspaper pub-

Charles Iwanaki, Secretary/Treasurer  
Connecticut Daily Newspaper Association  
c/o The Record Journal - Meriden  
March 23, 1987  
Page two

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lishers. The Task Force respectfully requests that the Connecticut Daily Newspaper Association take an active role in equal housing opportunity, by advocating that its members:

1. Refuse to accept ads which indicate either directly or through euphemisms, that it is acceptable to discriminate against families with children.
2. Publish a fair housing statement in the classified ads section, whenever ads pertain to the rental or sale of housing property.

I would appreciate it if you would keep me informed of the position that the Connecticut Daily Newspaper Association intends to take with regard to the advocacy role proposed herein. Moreover, I am very interested in the reaction of Connecticut newspaper publishers to the Task Force proposals, and invite comment at 566-7108. Please respond after the April 2, 1987 annual meeting.

Very truly yours,

*Sharon Scully* (SYRP)

Sharon Scully  
Chairperson  
Task Force on Housing in Connecticut

SS:syrp  
Enclosure

cc: Task Force Members  
Joseph Zerbery, Publisher  
The Bristol Press



STATE OF CONNECTICUT  
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES  
90 WASHINGTON STREET HARTFORD, CONNECTICUT 06106

April 22, 1987

IN REPLY  
566-7108

Mr. Eliot C. White  
Vice President and Assistant Publisher  
The Meriden Record Co.  
Crown Street Square  
Meriden, Connecticut 06450

Dear Mr. White:

I have received your letter, dated April 10, 1987, and look forward to the Connecticut Daily Newspaper Association Executive Committee's response.

In preparation for the CDNA annual meeting, I collected newspapers from around the state. I have enclosed copies of the classified ad section from the following newspapers: The Waterbury Republican, The New Britain Herald, The Record Journal, The Danbury News-Times, The Norwich Bulletin, The Litchfield Enquirer, The New Haven Register, The Bridgeport Post-Telegram, and The Norwalk Hour. As you can see from these enclosures, all of these newspapers print ads with restrictive language. Some ads blatantly say "no children"; but most say "adults preferred" or "ideal for single professional" but the message is the same: WE WILL NOT RENT TO FAMILIES WITH CHILDREN.

Under some limited circumstances, these ads may be legal. After all, there are exemptions and exceptions to Conn. Gen. Stat. Sec. 46a-64. But as a newspaper publisher, unless you verify that an advertisement is legal, you are risking a complaint that you are aiding and abetting an illegal discriminatory practice. Let me give you an example.

On March 24, 1987, I perused The Hartford Courant for rental ads that had restrictive language. This one caught my eye:

E. HTFD Burnside, Attractive  
1 or 2 BR apts. Carpet, appls,  
adults. No pets 522-5754

I called the telephone number and inquired about a two bedroom apartment. The lady on the other end wanted to know why I needed two bedrooms. I told her that I needed the second bedroom for my

C. White  
President and Assistant Publisher  
Record Co.  
100 West Square  
Hartford, Connecticut 06450  
1987

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child. She said that the landlord would not allow children on the second floor because of the noise. I asked if there were any two bedroom apartments available on the first floor and she said no. I tried to find out how large the building was and how much the rent was but she would not tell me. Once she found out that I had a child, she completely stonewalled me.

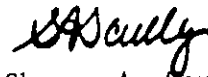
Two days later, a co-worker named Moira Butler called the same number. Moira said that she was looking for a two bedroom apartment for herself and her husband. When the woman on the other end of the phone wanted to know why they needed two bedrooms, Moira said that she wanted the spare room for her computer. The woman approved of that usage and proceeded to provide information and answer Moira's questions. Moira found out that the apartments were in a 30 unit apartment building.

It is clear that the advertiser above, was in violation of Conn. Gen. Stat. Sec. 46a-64a. I submit that the publisher of the ad is also culpable.

I urge the CDNA to educate its members, and recommend that they do not accept ads with restrictive language, whether that language be direct or subtle. Try to get a commitment from newspaper publishers that they will discontinue this practice, and the Task Force will monitor the classified ad sections looking for a significant improvement.

Voluntary compliance with the Task Force recommendation would be the best solution of all concerned.

Very truly yours,



Sharon A. Scully,  
Chairperson, Task Force on  
Housing in Connecticut

SAS:eeh

Enclosures

cc: Members and Friends of the Task Force

**PUBLISHER'S NOTICE**

**Equal Housing  
Opportunity**

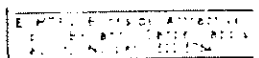
All real estate advertised in this newspaper is subject to the Federal Fair Housing Act of 1968 which makes it illegal to advertise any preference, limitation or discrimination based on race, color, religion, sex or national origin or an intention to make any such preference, limitation or discrimination.

**Public Act No. 80-449**

All residential property advertised in this newspaper is subject to the State of Connecticut Public Act No. 80-449 which prohibits discrimination against families with children in the renting of residential property. The act does not apply to the renting of single family and two family houses, a dwelling unit in a house containing dwelling units for not more than two families living independently of each other if the owner of such house resides in one of the dwelling units or if such rental would violate any local, state or federal law or regulation or condominium bylaw.

This newspaper will not knowingly accept any advertisement for real estate or the rental of residential property which is in violation of these laws.

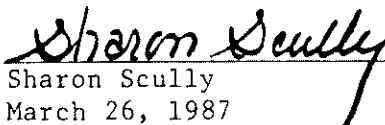
The Hartford Courant  
Hartford, Connecticut.  
Tuesday, March 24, 1987.



SHARON SCULLY

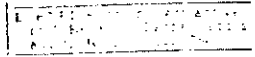
At 4:00 p.m. on March 24, 1987 I called 522-5754 to inquire about a two bedroom apartment advertised in The Hartford Courant. A copy of the advertisement is reproduced above. A woman answered the phone. When I told her that I was interested in a two bedroom apartment, she wanted to know why I needed two bedrooms. I told her that I intended to occupy the apartment with my husband and baby. She immediately said "This building does not lend itself to a baby". I asked her why. She said that the landlord does not allow children on the 2nd floor because of the noise. I asked her if two bedroom apartments were available on the 1st floor and she said no. I asked her how big the apartment building was and she refused to comment.

I asked her what the rent was and she refused to comment. She asked what my home number was and said that she would keep an eye out for apartments that accepted children. I asked her if she was a licensed real estate agent and she said yes, but that she did not normally deal with rental property. She said that she was handling this building because the owner was a personal friend. She said she would give me a call if she heard of any apartments that accepted children. She would not give me her name.

  
Sharon Scully  
March 26, 1987



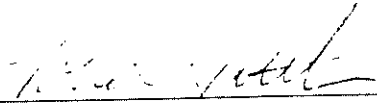
The Hartford Courant  
Hartford Connecticut  
Thursday, March 26, 1987



MOIRA BUTLER

Sharon Scully asked me to call 522-5754 to inquire about a two bedroom apartment that was advertised in The Hartford Courant. A copy of the advertisement is reproduced above.

At 11:40 a.m. on March 26, 1987 I phoned 522-5754 and explained that I was looking for an apartment for myself and my husband. A woman quoted the price on one bedroom apartments and I told her we needed a two bedroom apartment. She asked why, and I told her we needed an office for my computer. She said that made sense and she gave the rent as \$465.00 including heat and hot water. I asked her how large the building was and she said 30 units. I asked her how many floors were in the apartment building and she said two. I asked her if the rent was the same for a first and second floor apartment and she said yes. I asked her if there were any two bedroom apartments available on the first floor and she said no. She asked me where I lived, and I told her Asylum Street, Hartford. I asked her where the building was located so that I could drive by and look at it. She said she couldn't give out the address without an appointment. I said I would speak to my husband about it and call her back.

  
\_\_\_\_\_  
Moira Butler  
March 26, 1987

DAY, BERRY & HOWLAND

July 13, 1987

Sharon Scully, Chairman  
Task Force on Housing in Connecticut  
State of Connecticut Commission  
on Human Rights and Opportunities  
90 Washington Street  
Hartford, Connecticut 06106

Re: Connecticut Daily Newspaper Association

Dear Ms. Scully:

This office acts as counsel to the Connecticut Daily Newspaper Association. The Association has consulted us in regard to your letters to the Association of March 23 and April 22, 1987, concerning Connecticut's statutory prohibition on discrimination against families with children in the rental of housing. The matter has been addressed by the Association and its Executive Committee, and we have circulated among the membership the text of Connecticut General Statutes 46a-64a in order to insure that publishers are aware of the State's ban on such discrimination.

The Association has also circulated to its membership the text of a Fair Housing notice that makes explicit reference to the terms of CGS §46a-64a, as well as to the Federal Fair Housing Act and its prohibition on discrimination or preference on the basis of race, color, religion, sex, or natural origin, and has suggested that the member papers consider printing such a notice or one of similar import.

The Association, as it has declared to its members, is emphatic in its support of state and federal laws on housing discrimination. We appreciate your bringing the particular statute concerning discrimination against families with children

DAY, BERRY & HOWARD

Sharon Scully, Chairman  
July 13, 1987  
Page 2

to our attention. You can be assured that the Connecticut Commission on Human Rights and Opportunities has the full support of the Association in furthering the full observance of these laws.

Very truly yours,

  
J. Charles Mokriski

JCM/tsl



STATE OF CONNECTICUT  
COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES  
90 WASHINGTON STREET HARTFORD, CONNECTICUT 06106

July 29, 1987

Mr. J. Charles Mokriski  
Day, Berry & Howard  
Cityplace  
Hartford, Connecticut 06103-3499

IN REPLY  
(203) 566-7108

RE: Connecticut Daily Newspaper Association (CDNA)

Dear Mr. Mokriski:

Thank you for your letter of July 13, 1987. It was heartening to read of the affirmative efforts that the CDNA has taken to educate its members on Connecticut General Statutes Section 46a-64a, the law that prohibits discrimination against families with children in the rental of housing.

The Association's distribution of a Fair Housing notice which includes families with children as a protected class is a good first step for the CDNA to take. Of course, the Fair Housing notice should also include all of the classes protected under Connecticut General Statutes Section 46a-64. That statute makes it unlawful to discriminate in housing on account of RACE, CREED, COLOR, NATIONAL ORIGIN, ANCESTRY, SEX, MARITAL STATUS, AGE, MENTAL RETARDATION, or PHYSICAL DISABILITY, including, but not limited to, BLINDNESS or DEAFNESS. By publishing a notice that lists only the five classes that are protected under Title VIII, newspapers are telling readers about one-half of their rights. The Task Force recommends that newspapers apprise readers of their rights under Connecticut General Statutes Section 46a-64 and 46a-64a.

The above discussion and your letter of July 13, 1987 address the Task Force's recommendation that newspapers publish a Fair Housing statement in the classified ads section. Your letter did not respond to the Task Force's primary recommendation that CDNA members:

Refuse to accept ads which indicate directly or through euphemisms, that it is acceptable to discriminate against families with children.

What action has the CDNA taken on the above-referenced recommendation? The Task Force awaits your timely response.

Very truly yours,

*SAScully*  
Sharon A. Scully, Chairperson  
Task Force on Housing  
in Connecticut

SAS:eeh  
Enclosure

cc: Eliot C. White, The Meriden Record, Co.  
Charles Iwanaki, The Record Journal

