

Accents Speak Louder Than Words:
National Origin Discrimination in Rental Housing
In the North Bay
Based on Voice Identification

An Audit Report By

FAIR HOUSING OF MARIN

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FOREWORD

Discrimination in rental housing against persons because of national origin is illegal in California and throughout the nation. The purpose of this audit was to provide an indication of the extent to which persons of Latin or Hispanic origin experience discrimination or differential treatment in the initial stages of homeseeking, based on their accented speech.

Those responsible for this report hope that the results and recommendations contained herein will stimulate awareness and a cooperative effort by all segments of the Marin, Napa, and Sonoma communities to eliminate differential treatment against persons by virtue of their national origin.

We acknowledge the contributions and support of Stanford University Professor John Baugh, and Fair Housing of Sonoma County.

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TABLE OF CONTENTS

FOREWORD	2
EXECUTIVE SUMMARY	5
I. <u>INTRODUCTION</u>	7
A. FAIR HOUSING OF MARIN	7
B. LEGAL BACKGROUND	7
1. Federal Fair Housing Laws	7
2. California Fair Housing Laws	8
C. AUDIT BACKGROUND	8
II. <u>AUDIT GOALS AND METHODOLOGY</u>	9
A. WHAT IS A FAIR HOUSING AUDIT?	9
B. AUDIT GOALS	10
C. AUDIT GEOGRAPHIC SCOPE	10
D. AUDIT METHODOLOGY	11
1. Sampling Techniques	11
2. Matched Audit Teams	11
3. Recruitment, Screening, & Training of Testers	11
4. Testing Procedure	12
5. Analysis of Data	13

III. <u>RESULTS</u>	13
A. GEOGRAPHICAL BREAKDOWN	14
1. Marin County	14
2. Napa County	14
3. Sonoma County	14
B. TYPES OF DISCRIMINATION OR DIFFERENT TREATMENT	15
1. Screening	15
2. Terms & Conditions	15
3. Flexibility & Offers	16
4. Comments & Questions	17
5. Amenities	18
6. Steering/Availability	18
C. LINGUISTIC ANALYSIS	19
IV. <u>CONCLUSIONS</u>	19
A. GENERAL	19
B. AUDIT LIMITATIONS	20
1. Non-Application Testing Underestimates Discrimination	20
2. The Housing Market Was Soft During the Audit Period	20
3. Scheduling Factors May Have Influenced Audit Results	21
C. RECOMMENDATIONS	22

EXECUTIVE SUMMARY

This report presents results of an audit for national origin discrimination based on voice identification in rental housing in the California counties of Marin, Napa, and Sonoma. FHOM has conducted four audits since 1991 to measure the extent of discrimination against Latinos, and in all the audits Latinos were treated less favorably at 25% - 70% of the sites. This included being offered fewer units, quoted higher rents, or faced with a longer approval process. Potential national origin discrimination is a significant concern because the Latino population in Marin, Napa, and Sonoma counties has grown dramatically over the last decade, far exceeding the 43% Latino population growth statewide.

Although this audit marks FHOM's first effort to isolate whether discrimination occurs based solely on phone contacts, our previous testing has suggested that it may. Studies by Stanford University linguistics professor John Baugh confirm race and ethnicity discrimination based solely on speech patterns, and that people correctly identify race 80% of the time by the speaker's single utterance of the word "hello." As part of the audit team, Professor Baugh and his team analyzed whether each tester's race or national origin would be apparent to the average reasonable listener.

A fair housing audit is a way to assess compliance or non-compliance with federal and state fair housing laws. It is a controlled measurement of the difference in quality, quantity, and content of information and services accorded paired customers (testers) by housing providers. Audit Coordinators selected sites randomly, based on advertisements in the major newspapers of the three counties and on Craigslist, the nation's largest internet bulletin board. Telephone tests utilized paired teams of Latino and Caucasian testers with each team member matched to his or her counterpart as closely as possible in age, gender, and manner.

Between March 2005 and June 2005, FHOM conducted 60 telephone tests (20 each in Marin, Napa, and Sonoma counties) in order to assess whether Latinos seeking rental housing face disadvantageous differential treatment based on voice identification alone. The tests fell into three groups, those showing clear, disadvantageous differential treatment; moderate and/or mixed instances of differential treatment; and those showing no differential treatment.

As detailed more fully below, the audit showed that in Marin County, Latino testers encountered clear differential treatment 35% of the time. In addition to the seven Marin County tests showing clear differential treatment, another four showed mixed and/or moderate differences in treatment. Thus, Latinos faced some differential treatment in 55% of the Marin County tests.

The audit showed that Latino testers encountered clear differential treatment 5% of the time in Napa County. In addition to the one Napa County test showing clear differential treatment, thirteen more showed mixed and/or moderate discrepancies. Accordingly, a total of 14 tests, representing 70% of the Napa County total, showed Latino testers encountering some discrepancies or disadvantages in treatment.

In Sonoma County, Latino testers experienced clear differential treatment 30% of the time. In addition to the six Sonoma County tests showing clear differential treatment, Latinos encountered mixed and/or moderate differences in treatment in ten more tests. Hence, in fully 80% of the Sonoma County tests, Latinos faced some discrepancies or disadvantages in treatment.

Recommendations as a result of the audit include disseminating audit results to the general public and Latino media; monitoring sites where there was indication of differential treatment; offering fair housing training seminars to housing providers audited; increase media coverage on barriers faced by Latinos in accessing rental housing; conducting additional audits, and asking members of the housing industry to take a positive stance on fair housing issues; spreading the word to potential targets to educate them; and promoting the display of the required HUD equal opportunity housing poster.

NATIONAL ORIGIN DISCRIMINATION IN RENTAL HOUSING BASED ON VOICE IDENTIFICATION

AUDIT REPORT

I. INTRODUCTION

This report presents results of an audit for national origin discrimination based on voice identification in rental housing in the California counties of Marin, Napa, and Sonoma. The audit took place between March 2005 and June 2005.

A. FAIR HOUSING OF MARIN

Fair Housing of Marin (FHOM) is a private nonprofit agency dedicated to assisting individuals experiencing housing discrimination, and educating the community, including tenants, managers, property owners, and residents, as to their rights and responsibilities under federal and state fair housing laws.

B. LEGAL BACKGROUND

1. Federal Fair Housing Laws

Housing discrimination based on race, color, religion, gender, national origin, mental or physical disability and familial status (the presence of children in the family) is illegal under Title VIII of the Civil Rights Act of 1968, as amended in 1988.

Congress enacted Title VIII of the Civil Rights Act of 1968, commonly known as the Fair Housing Act (FHA), which prohibited discrimination based on race, color, religion or national origin in the sale, rental or financing of housing. In 1974, Congress expanded the FHA to prohibit discrimination based on gender. In 1988 Congress passed the Fair Housing Amendments Act (FHAA), which added families with children (familial status) and persons with mental and physical disabilities to the categories of people protected against housing discrimination.

The FHAA specifically states that because of race, color, religion, sex, national origin, disability or familial status it is prohibited to:

- Refuse to sell or rent after the making of a bona fide offer, or to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny a dwelling.
- Discriminate in the terms, conditions, or privileges or sale or rental of a dwelling, or in the provision of services or facilities.
- Make print or publish, or cause to be made, printed or published any notice, statement, or advertisement, with respect to the sale or rental of a dwelling that indicates a preference or limitation.
- Represent that any dwelling is not available for inspection, sale, or rental when such dwelling is in fact so available.

2. California Fair Housing Laws

The two primary state fair housing laws are the Fair Employment and Housing Act (FEHA) and the Unruh Civil Rights Act. These laws include the same protected classes of persons as the federal law, and also prohibit discrimination based on marital status, sexual orientation, source of income, and arbitrary factors such as age.

C. AUDIT BACKGROUND

Over the past year, the number of national origin discrimination complaints from Latinos has averaged 17% of FHOM's caseload. FHOM has conducted four audits to measure the extent of discrimination against Latinos. The first Marin audit, in 1991, found that Latinos experienced 25% discrimination; the second, in 1998, showed that the percentage had risen to 31%. Our 1999 Sonoma County audit found Latinos were treated less favorably at 70% of the sites. This included being offered fewer units, quoted higher rents, or faced with a longer approval process. FHOM's 2004 Napa County audit showed similar results.

Real estate transactions, including rentals, purchases, and obtaining mortgage loans and homeowner's insurance, are often conducted in whole or part over the

telephone. Although this audit marks FHOM's first effort to isolate whether discrimination occurs based solely on phone contacts, our previous testing has suggested that it may. The implication of those prior tests is that the race or national origin of individuals is apparent during telephone conversations and that discrimination occurs based upon that voice identification. Studies by Stanford University linguistics professor John Baugh confirm race and ethnicity discrimination based solely on speech patterns. In a March 1999 article, "Perceptual and Phonic Experiments on American English Dialect Identification," Professor Baugh showed that people correctly identify race 80% of the time by the speaker's single utterance of the word "hello."

National origin discrimination is a significant concern because the Latino population in Marin, Napa, and Sonoma counties has grown dramatically over the last decade, far exceeding the 43% Latino population growth statewide. In Marin, the Latino population increased 60% between 1990 and 2000, and accounts for 11% of the County's population. In Napa County during that period, the Latino population grew by 84%, and accounts for 23% of the County's population. Likewise in Sonoma County, the Latino population grew by 93% and represents 17% of the County's population. Meanwhile, the Caucasian population has decreased in all three counties.

II. AUDIT GOALS AND METHODOLOGY

A. WHAT IS A FAIR HOUSING AUDIT?

A fair housing audit is a way to assess compliance or non-compliance with federal and state fair housing laws. It is a controlled measurement of the difference in quality, quantity, and content of information and services accorded paired customers (testers) by housing providers. An audit differs from a complaint-driven test in that it gives a larger picture, or overview, of housing provider behavior in a given market during a certain time period. Public governmental bodies and private agencies throughout the country routinely conduct audits as an educational and enforcement tool.

B. AUDIT GOALS

1. To identify instances of differential treatment at selected rental sites, including single-family homes and multi-family complexes, thus providing an indication of the extent to which Latinos face difficulty in securing rental housing in Marin, Napa, and Sonoma counties due to national origin discrimination.
2. To conduct on-site tests where phone results indicate potential discrimination, and to conduct additional investigations at sites where results suggest that further investigation could yield stronger evidence of discrimination.
3. To file administrative complaints with HUD in cases where evidence of differential treatment is strong.
4. To bring minor violations to the attention of housing providers, in order to increase awareness of the potential consequences of engaging in discriminatory practices and prevent future transgressions.
5. To increase awareness by housing providers of the difficulties Latinos experience in securing rental housing and to make Latino homeseekers aware of discriminatory practices they may experience and the services provided by FHOM to secure housing rights.
6. To offer training to housing providers on fair housing laws and practices, in order to forestall future discrimination.

C. AUDIT GEOGRAPHIC SCOPE

The audit included properties in the major cities and unincorporated areas throughout the tri-county area. Sixty phone tests (20 each in Marin, Napa, and Sonoma), reached agents administering the rental of over 1500 units.¹ Housing units included apartment complexes, duplexes, condominiums, and single-family homes.

D. AUDIT METHODOLOGY

1. Sampling Techniques

- a. Audit Coordinators selected sites randomly, based on advertisements in the major newspapers of the three counties and on craigslist, the nation's largest internet bulletin board.

2. Matched Audit Teams

- a. Telephone tests utilized paired teams of Latino and Caucasian testers with each team member matched to his or her counterpart as closely as possible in age, gender, and manner.
- b. Audit coordinators assigned the paired testers equivalent rental credentials, except that the protected class (Latino) testers were assigned slightly higher incomes than their control (Caucasian) tester counterparts. Each tester had the profile of part of a married household with no children or pets, employed, with a household income equaling at least three times the advertised rent. Audit coordinators instructed testers to express identical housing needs; for instance, each member of a pair was instructed to ask for a one- or two-bedroom apartment at the same complex.

3. Recruitment, Screening, & Training of Testers

- a. Testers received general fair housing tester training, plus special training in audit procedures.
- b. FHOM staff videotaped each tester and submitted the tapes to Stanford University Professor of Psychology, Anthropology, Education, English and Linguistics John Baugh. Based on the videotapes, Professor Baugh and his team analyzed whether each tester's race or national origin would be apparent to the average reasonable listener. *See also* "Linguistic Analysis" in the "Results" section below.

4. Testing Procedure

- a. Each tester telephoned an assigned phone number during a designated time frame. Due to scheduling issues, the Audit Coordinators scheduled the first (Latino) testers to make calls during the first few days of the week, and the second (Caucasian) testers to call on the last few days of the week.
- b. The first tester of a pair called and left a message if s/he did not reach an agent. If the tester did not receive a return call, s/he would call a second time either later that day or within the following days, and leave another message; if s/he still did not get a call back, s/he would repeat the procedure, leaving a total of three messages. The second tester of a pair called after the first tester had spoken with an agent, or after the first tester had left three unreturned messages.
- c. Audit Coordinators instructed testers to follow a script during each call. FHOM developed the script specifically for the audit. Latino testers used Spanish names and Spanish language pronunciations for Spanish words (e.g., Tiburon, San Rafael, Spanish surnames, etc.), and in most cases began their phone calls with a Spanish word or phrase (e.g., “bueno” instead of “hello”).
- d. Upon ending each call, testers completed a Tester Report Form that FHOM tailored for this audit, with information about unit availability, rental terms and conditions, application process and tenant prerequisites, and a narrative description of what transpired.
- e. In addition, an Audit Coordinator debriefed the testers upon completion of each phone test and reviewed their written reports.

5. Analysis of the Data

- a. Senior FHOM staff analyzed the data, and evaluated each audit phone test for discriminatory statements or differential treatment by comparing information with regard to the following:
 - i. unit availability;
 - ii. rental terms and conditions (including amenities and special offers);
 - iii. statements regarding ethnicity or other protected classes; and
 - iv. call backs and other factors
- b. Tests featuring discriminatory statements or differential treatment disfavoring Latinos may be the basis of further investigations, including on-site testing.

III. RESULTS

Between March 2005 and June 2005, FHOM conducted 60 tests, 20 each in Marin, Napa, and Sonoma counties. The tests fell into three broad groups: those showing no differential treatment, those showing clear differential treatment, and an intermediate group evincing moderate and/or mixed instances of differential treatment. For purposes of this report, “no differential treatment” means that each paired tester received identical or almost identical information; “clear differential treatment” means that there was a demonstrable discrepancy in the amount, quality, or substance of the information the testers received, to the disadvantage of the Latino tester (the starkest example being cases where Latino testers failed to receive a return call despite leaving three voicemail messages); and “mixed and/or moderate differential treatment” means that there was a disparity between the information received, but it did not rise to the level of clear differential treatment either because the discrepancies did not overall favor the Caucasian tester, or because the differences did not involve significant factors.

A. GEOGRAPHICAL BREAKDOWN

1. Marin County (20 tests)

Seven of the Marin County tests (35%) showed clear differential treatment (including three cases where Latino testers failed to receive return calls). Four Marin tests (20%) showed mixed and/or moderate differences in treatment. Nine tests (45%) showed no differential treatment. Thus in 11 out of 20 tests (55%), there were at least some discrepancies or disadvantages in treatment.

2. Napa County (20 tests)

One Napa County test (5%) showed clear differential treatment, 13 (65%) showed mixed and/or moderate discrepancies, and six (30%) showed no differences. Thus, 14 tests (70%), showed some discrepancies or disadvantages in treatment.

3. Sonoma County (20 tests)

Six Sonoma County tests (30%) showed clear differential treatment (including one case where the Latino tester failed to receive a return call). Ten Sonoma tests (50%) showed mixed and/or moderate differences in treatment, and four tests (20%) showed no discrepancies. Thus 16 tests out of 20 (80%) showed some discrepancies or disadvantages in treatment.

	Marin County	Napa County	Sonoma County
Differential Treatment	7 (35%)	1 (5%)	6 (30%)
Mixed Differential Treatment	4 (20%)	13 (65%)	10 (50%)
Sub-total/Some Differential Treatment	11 (55%)	14 (70%)	16 (80%)
No Differential Treatment	9 (45%)	6 (30%)	4 (35%)
Grand Total	20 (100%)	20 (100%)	20 (100%)

B. TYPES OF DISCRIMINATION OR DIFFERENTIAL TREATMENT

The audit data indicates several ways in which housing providers exhibit differential treatment to the disadvantage of Latinos.

1. Screening

For purposes of this audit, “screening” describes a practice whereby the housing provider routinely uses a phone answering system to filter calls, possibly in order to thwart undesired applicants. Evidence of this technique occurred in three Marin County tests and one Sonoma County test.

- In one Marin test where the Latino left three voicemail messages and never received a call back, the agent picked up the phone right after the Caucasian tester began to leave her first voicemail message.
- In another Marin test, the Latino tester left three voicemail messages and did not receive a return call, though the Caucasian tester received an immediate call back after leaving one message. The same phenomenon occurred in one Sonoma County test.
- In a third Marin case, the Latino tester left two messages without getting a return call. When she reached the provider on her third call, the provider put her off, asking her to call that evening instead. By contrast, that provider gave the Caucasian tester an immediate call back after one message.

2. Terms & Conditions

Tests in each county showed instances of Latinos receiving information about less advantageous terms and conditions. Evidence of this occurred in six tests, including one each in Marin and Napa, and four tests in Sonoma County.

- In one Marin case, the agent offered the Caucasian tester a lower rent than his Latino counterpart. In this case, the agent also provided only the Caucasian tester details about specific office hours to facilitate her seeing the unit; by contrast, the agent was vague with the Latino tester, just saying that she could see the unit any time.

- In a Napa County test, the agent offered the Caucasian tester a free credit check, but quoted a fee to the Latino tester.
- In a Sonoma County test, the agent promptly told the Latino tester that the subject unit was too small for two people, but in speaking to the Caucasian tester said that whether the place was large enough would be up to the tester and her husband.
- In another Sonoma test, the Latino tester was told a higher rent and deposit than his Caucasian counterpart.
- One agent in a Sonoma test told only the Caucasian tester that the deposit amount was negotiable.
- In another Sonoma County test, the agent gave a different range of deposit amounts to each tester.

3. Flexibility & Offers

Numerous tests showed evidence of agents offering more flexible terms and a broader range of options to Caucasian testers. Evidence of this occurred in thirteen tests, including three in Marin County, eight in Napa County, and two in Sonoma County.

- In one Marin County test, an agent volunteered to only the Caucasian tester that they could be flexible in deciding whether to check credit.
- In two Marin tests and one Napa test, an agent volunteered to only the Caucasian tester that he could place a deposit to hold the unit.
- In three Napa County tests and two Sonoma County tests, agents volunteered to only the Caucasian testers that they could pay their deposits and move-in costs in multiple installments.

- In a Napa County test, the agent gave the Caucasian tester the options of a seven or 13-month lease but told the Latino tester that a 13-month lease was required.
- In a different Napa test an agent conveyed to the Latino tester that a six-month lease was mandatory, but told the Caucasian tester that such a lease was preferred.
- Similarly, in another Napa test the agent told the Latino tester that a one-year lease was required, but indicated to the Caucasian tester that although a one-year contract was preferred, they would consider six months instead. In that same case, the agent told the Latino tester that an income of three times the rent was mandatory, but told the Caucasian tester that they would also take other factors such as job stability into account.
- In another Napa test, the agent set forth a mandatory minimum income to the Latino tester; by contrast, the agent told the Caucasian tester that if there were problems with his credit check, they would then require proof of employment and a minimum income.

4. Comments & Questions

Tests in each county reflected a possible bias that Latinos would have more people living in the unit than would Caucasian tenants. Evidence of this occurred in four tests, including one each in Marin and Napa, and two in Sonoma County.

- In a Sonoma County test, the agent questioned only the Latino tester about how many people would live in the home, whether she had children (twice), where she worked, where her husband worked, whether she had other family, and whether other family members lived with her. (When the tester responded that no other relatives lived with them, the agent queried, “for real?”)
- In one Marin test, the agent asked only the Latino tester how many people would be living in the residence.
- In a Napa County test, the agent promptly asked the Latino tester whether he

had children, and also asked the tester where he worked and what he did there, whether his wife worked as well, and why they were moving. When speaking with the Caucasian tester, the agent did not ask the same questions. Rather, she simply asked the Caucasian tester whether she worked in Napa, and was forthcoming with details about the unit, telling the tester she hoped to hear from her soon. She did not say this to the Latino tester.

- In a Sonoma County test, during the course of her phone conversation with the Latino tester the agent revised her deposit quote upwards. When the tester questioned her about this, the agent responded that sometimes people bring others to live with them. She asked the tester whether she had children, although the tester had already stated that the place was just for her husband and herself.

5. Amenities

One test in particular showed a housing provider as more forthcoming to the Caucasian tester about benefits associated with the property.

- In this Marin test, when the Latino tester reached the agent (after leaving two unreturned messages), the agent answered her questions about rental terms but volunteered no information. By contrast, when the agent spoke with the Caucasian tester (after immediately returning her call), he waxed eloquent about the amenities of the place, including recent refurbishment, new appliances, closet space, and a lovely yard.

6. Steering/Availability

In several tests the Caucasian testers received information about greater availability. Evidence of this occurred in three tests, including two in Marin County and one in Sonoma County. In some cases the disparity in information suggests potential steering of Latino and Caucasian applicants to different properties or areas.

- In a Sonoma County test the Caucasian tester received information about four upcoming vacancies, whereas the agent told the Latino tester about only one.

- In one Marin test where both testers inquired about one and two-bedroom apartments, the agent told the Latino tester about two available units, each in a separate building, and each two-bedrooms. The agent told the Caucasian tester about more available apartments but they were all one-bedroom units, all in the same building, and all less expensive than the units disclosed to the Latino tester.
- In another Marin test where both testers responded to an advertisement about an apartment in San Anselmo, the agent gave the Latino tester information about the San Anselmo property but also told him about a unit in Novato (one of the two Marin communities with a significant Latino population). An agent gave the Caucasian tester information about several San Anselmo vacancies but did not mention the Novato property.

C. LINGUISTIC ANALYSIS

Professor's Baugh's analysis of FHOM's testers (in Linguistic Analyses and Evaluations of Nine Fair Housing testers from Marin, California: Demographic Identification Based on Speech) illustrated that "the vast majority of listeners accurately identified the backgrounds of both native and non-native speakers of English." This suggests strongly that the housing providers tested in this audit knew which testers were Latino, and which were Caucasian. Professor Baugh has been featured nationally regarding the occurrence of linguistic profiling and its potential negative consequences. Although it is beyond the scope of this audit to discern the actual reasons for the disparate treatment detected, Professor Baugh points out that his linguistic analysis supports the proposition that "it is possible that some landlords or sellers may treat prospective tenants or buyers differently based on ... linguistic differences."

IV. CONCLUSIONS

A. GENERAL

Out of 60 tests in the three counties, 14 (23%) showed clear differential treatment, 27 (45%) showed mixed and/or moderate differential treatment, and 19 tests (32%) showed no differential treatment. Thus, 41 of 60 tests (68%) indicated at least some discrepancies or disadvantages in treatment.

B. AUDIT LIMITATIONS

1. Non-Application Testing Underestimates the Degree of Discrimination

By virtue of its very design and purpose, this audit could not capture the full picture of discriminatory conduct. This audit sought to measure only the degree of discrimination an individual would encounter over the phone, at the most preliminary housing search stage. Because testers did not appear in person and did not submit applications, this audit cannot identify housing providers who dispense information freely but discriminate later in the tenant selection process. This suggests the need to perform site visit and application tests in addition to the phone tests conducted to date, especially in those instances where phone tests suggest differential treatment. Completed application tests could yield evidence of housing providers turning down qualified Latino applicants because of their national origin.

Even application tests would not detect the full extent of discrimination against in-place Latino *tenants*, as opposed to *applicants*. Latino renters report discrimination based on national origin or a combination of national origin/familial status, national origin/sexual harassment, and other “combined” forms of unfair treatment. This audit necessarily excludes evidence of that kind of discrimination.

2. The Housing Market Was Unusually Soft During the Audit Period

One is less likely to encounter discrimination in a “soft” market, where housing providers often relax their standards in order to fill vacancies. Thus, an audit conducted in a soft rental market probably shows less discrimination than would exist in a tighter market. A soft rental market characterized the rental housing scene for the entire period covered by the testing for this audit. Vacancy rates in Napa hovered between 7 and 9%, and in Sonoma between 9 and 10%, according to the Bay Area Apartment Spring 2005 Report. The same report shows Marin with a vacancy rate between 4 and 5% for the relevant period. Anecdotal evidence corroborates those statistics. FHOM’s rental testing reflects that housing providers are courting renters with inducements such as rent discounts and reduced security deposits.

3. Scheduling Factors May Have Influenced the Audit Results

FHOM discarded some of the tests it conducted for this audit because of delays between the first and second testers' contacts with the housing provider.² Because FHOM did not analyze these "failed" tests, one cannot know whether and in what way they might have altered the final picture that emerged from the audit. The Audit Coordinators opted to alleviate unreasonable delays between the first and second tester's contacts by having them call at specified times. Although that solution reduced the volume of failed tests, the resultant pattern of calling may have subtly impacted the test results.

In some of the tests, for example, the two testers spoke with different agents. Although the most direct comparison takes place in instances where each member of a paired test has contact with the same agent, under generally recognized principles of agency a test remains valid if testers speak with different agents representing the same housing provider. In addition, what at first appears to be a discriminatory failure to return a phone call could in some cases be simply a product of office hours. Because testers called agents on many different days, however, it is probable that these circumstances had little impact on the audit results.

C. RECOMMENDATIONS

- **Disseminate audit results** to the Marin County Board of Supervisors Task Force on Housing Discrimination for it to make recommendations to the full Board of Supervisors for remedial action. FHOM will also disseminate the audit results to the general public media and in particular to the Latino media and Latino advocacy groups as an important educational tool.
- **Monitor sites** where there was an indication of differential treatment. Fair Housing of Marin may conduct further testing at those sites where disadvantageous treatment was indicated, and take appropriate action.
- **Offer Fair Housing training** seminars to the owners, managers, and agents audited in this report. The audit points out the need for continuous training in fair housing laws for all owners and managers of rental property, with an emphasis on the subtleties of differential treatment and the need to supply uniform information and treatment to all potential applicants, even over the phone. Fair Housing of Marin has conducted *Fair Housing Law and Practice* seminars in Marin, Napa, and Sonoma counties for the last 15 years. Such educational endeavors should be supported by public officials and aggressively marketed to housing industry providers through Housing Associations and elected officials. It is important to ensure that all housing providers and their staffs receive fair housing information and training.
- **Increase media coverage.** Request that newspapers in the three counties feature articles on national origin discrimination and barriers faced by Latinos even in making preliminary phone inquiries about rental housing, and consider providing as a public service no cost advertisements on recognizing and avoiding housing discrimination.
- **Conduct additional audits.** Because discrimination is so often subtle, or cloaked as helpful suggestions, it often goes undetected. Comparative studies such as this one are the best way to bring such practices to light. We recommend that the Counties of Marin, Napa, and Sonoma consider funding similar studies in the future.

- **Housing Industry Action.** Ask members of the housing industry, such as the Marin Association of Realtors, the North Bay Association of Realtors, the Napa County Association of Realtors, property management firms in all three counties, and local rental housing associations, to take a positive stance that fair housing is good business and good *for* business. We recommend that these organizations publicly declare their support with a statement on their letterhead, outreach materials, and forms, and offer their forms and marketing materials in Spanish, with Latino models.
- **Spread the word to potential targets.** Work with other agencies serving the Latino community to inform their clients of their fair housing rights and available services.
- **Promote display of required HUD poster.** Ask that rental property owners and real estate offices check to make sure that the required HUD equal opportunity housing provider logo is posted in plain view for applicants. The poster can be downloaded from the HUD website at www.hud.gov or by calling toll free 800-347-3739.

¹ This is an approximation based on the combined total of rental units at the 60 properties tested. Because some of the rental agents involved in this audit likely have control over units at properties other than those tested, the number of rental units affected by the practices found is probably greater than 1500.

² Due to the busy schedules of both agents and testers, in numerous instances the second tester was unable to speak with an agent within a reasonable time after the first tester made contact. This occurred in cases where the agent did return phone messages left by the second tester but the parties were not able to reach each other within a reasonable time span. Thus, the 60 tests that were finally tabulated for the audit were not the first or only 60 tests done.