

ANALYSIS OF IMPEDIMENTS STUDY TO FAIR HOUSING CHOICE

Cleveland, TN

May 2014



ANALYSIS OF IMPEDIMENTS STUDY TO FAIR HOUSING CHOICE

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I. Introduction and Executive Summary of the Analysis

The Analysis of Impediments Study to Fair Housing Choice (AI) provides cities with information related to policies, procedures, and practices in place that impede fair housing choice for all its citizens. The study is a requirement by the U.S. Department of Housing and Urban Development (HUD) to ensure that its entitlement jurisdictions are affirmatively furthering fair housing choice through its federally funded programs and projects. The City of Cleveland became a HUD entitlement jurisdiction in 2004 with its first allocation of Community Development Block Grant (CDBG) funds. Since then, the city has planned and provided activities to accomplish this requirement through public awareness efforts, promoting April as Fair Housing Month (April), and participated in regional fair housing activities.

The basis for this requirement is embedded in the Federal Fair Housing Act as of the Civil Rights Act of 1968, as defined below.

The Federal Fair Housing Act (FHAct), 42 U.S.C. 3601-19, prohibits discrimination in housing practices on the basis of **race, color, religion, sex, national origin, familial status, and disability**. (FH Act uses the term handicap, however, this document uses the term disability, which has the same legal meaning.) The Act prohibits housing providers from discriminating against persons because of their disability or the disability of anyone associated with them and from treating persons with disabilities less favorably than others because of the disability. The Act also requires housing providers to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford such person(s) equal opportunity to use and enjoy a dwelling. In addition, the Act requires that housing providers allow tenants to make reasonable modifications to units and common spaces in a dwelling. The Act applies to the vast majority of privately and publicly owned housing including housing subsidized by the federal government or rented through the use of Section 8 voucher assistance. HUD's regulations implementing the disability discrimination prohibitions of the Act may be found at 24 CFR 100.201-205.

Furthermore, the impediments to fair housing choice are:

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

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

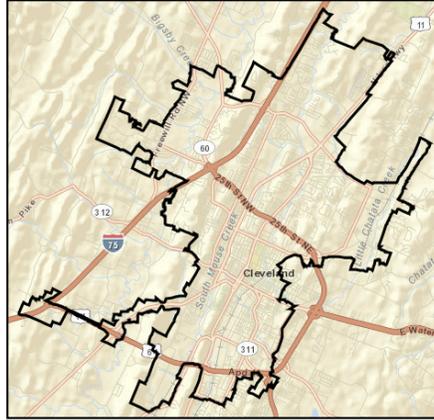
- ❑ A comprehensive review of a State or Entitlement jurisdiction's laws, regulations, and administrative policies, procedures, and practices
- ❑ An assessment of how those laws, etc. affect the location, availability, and accessibility of housing
- ❑ An assessment of conditions, both public and private, affecting fair housing choice for all protected classes
- ❑ An assessment of the availability of affordable, accessible housing in a range of unit sizes.

The AI process was combined with the Consolidated Planning process and began in November 2013 with a series of meetings with various city department directors and partners within the city of Cleveland, TN. A questionnaire was also disseminated to obtain feedback regarding fair housing choice and barriers to affordable housing. Two public hearings were also held to disseminate information, gather and obtain valuable community input, and obtain useful information for the Consolidated Plan and AI study. A list of participants is included in the Appendix of the Consolidated Plan.

The following is a list of impediments to fair housing choice in Cleveland. The list of impediments and recommendations are found in the last section of this study and is not conclusive but provides the city with useful strategies for implementation.

- 1. Lack of public awareness of fair housing laws and landlord-tenant laws.**
- 2. Southside of Cleveland is currently concentrated with low-income households and affordable housing developments.**
- 3. Mortgage lending practices are to be addressed since there were high denial rates among certain races.**
- 4. Limited English Proficiency is lacking with city's website and systems for disseminating information.**

II. Jurisdictional Background Data



Population

The City of Cleveland, TN is a growing city nestled between Chattanooga and Knoxville. Only 32 miles from Chattanooga, TN and 83 miles from Knoxville, TN, Cleveland provides an opportunity for many households to settle in an inviting community on the cusps of larger cities. The population in Cleveland has increased steadily over the past decade at a rate of nearly 9% from nearly 38,000 in 2000 to 41,000 in 2010. Over the last fifty years, the highest population increase occurred between 1990 and 2000, as shown in Table 2.1 and Table 2.2.

Tables 2.1 & 2.2 Population Change 1960-2010

Cleveland, Tennessee - Overview	2010 Census	2000 Census	2000-2010 Change	
	Counts	Counts	Change	Percentages
Total Population	41,285	37,879	3,406	8.99%

City of Cleveland, TN 1960-1990				
	1990	1980	1970	1960
Population Totals	30,354	26,415	21,446	16,196

Data: US Census

The City of Cleveland also has two colleges that aid in its population growth, Lee University and Cleveland State Community College. Both colleges are in the heart of the city and have an increasing growth in the past decade. Lee University, a private Liberal Arts college, currently has a student population of nearly 5,000 students (estimated 4,922). Cleveland State Community College is an accredited public

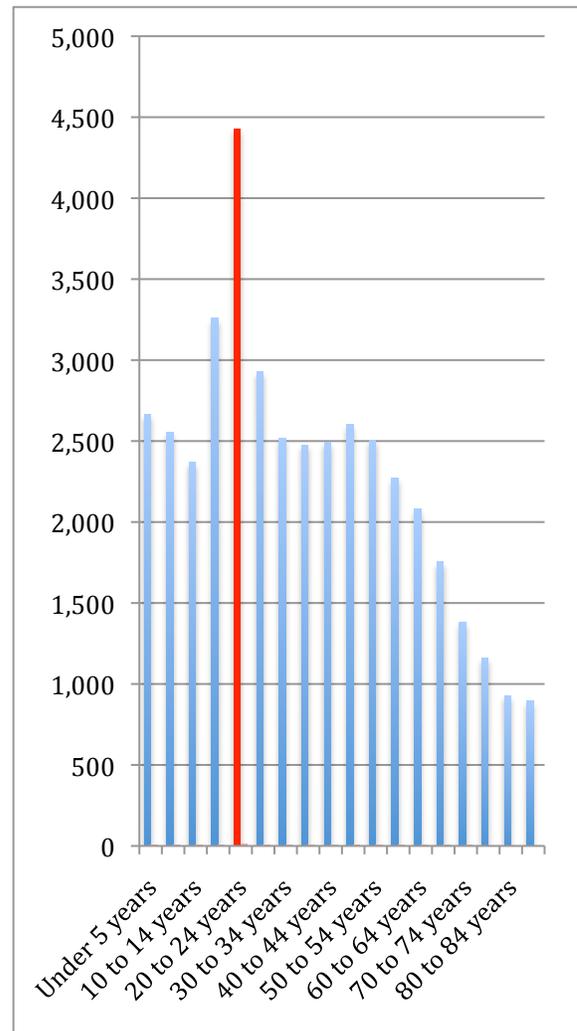
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community college with approximately 5,000 credited and non-credited students, as well. CSCC employs nearly 200 employees, including faculty and staff members. The increase in the student population directly influences the statistics in the age of the population. As Figure 2.1 displays, the highest population in the age category is significantly the age group between 20-24 years of age. This age group has a population of 4,429, which may show that graduates of these colleges are continuing their lives in Cleveland. The second highest age group is the 15 to 19 years age group at 7.9% of the population.

Figure 2.1 Age Categories

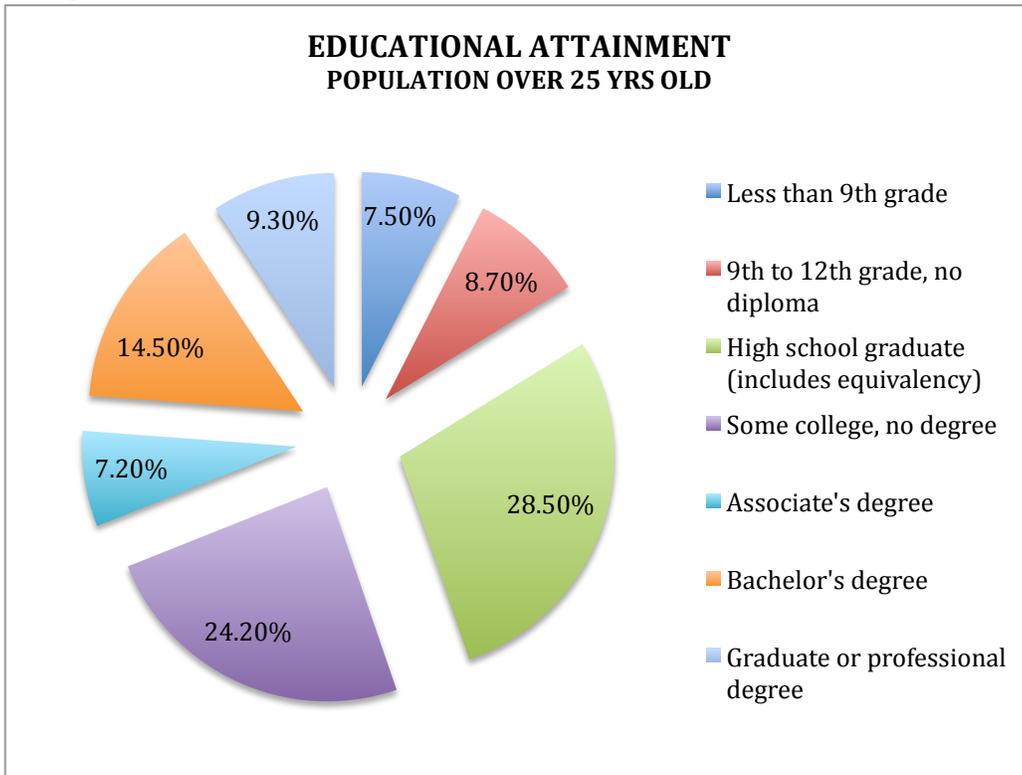
Age Category	Number	Percentage
Under 5 years	2,665	6.5
5 to 9 years	2,556	6.2
10 to 14 years	2,372	5.7
15 to 19 years	3,259	7.9
20 to 24 years	4,429	10.7
25 to 29 years	2,930	7.1
30 to 34 years	2,518	6.1
35 to 39 years	2,476	6
40 to 44 years	2,494	6
45 to 49 years	2,602	6.3
50 to 54 years	2,506	6.1
55 to 59 years	2,273	5.5
60 to 64 years	2,083	5
65 to 69 years	1,754	4.2
70 to 74 years	1,383	3.3
75 to 79 years	1,162	2.8
80 to 84 years	929	2.3
85 years and over	894	2.2



Data: US Census

The educational attainment figures in Cleveland further shows a population over 25 years old has over 50% with a high school diploma or equivalent, with some college, displayed in Figure 2.2 below. Only 7.5% of the population over 25 years old have less than a 9th grade education. Bachelor and advanced degree categories are nearly a quarter of the population at approximately 14.5% and 9.3%, respectively.

Figure 2.2 Educational Attainment



Data: 2010 US Census

Race

While age and educational attainment are important factors in reviewing policies in a city, race is also an important factor. The diversity in the city is increasing at a steady pace in several minority groups. The 2010 census reveals that nearly 20% of the population is of a minority group rather than the predominant “White alone” category. Minority groups like “Persons of Hispanic or Latino Origin” and the “Black or African American alone” in Cleveland have consistent percentages in population around 7%, as shown in Table 2.3 and Figure 2.3.

Other population groups with over 1,000 in population include the “Two or more races” and “Some other race alone” groups. The population group with the least amount of individuals includes the “Native Hawaiian and Other Pacific native alone” category with only around 35 people in 2010 although there has been an increase in the past decade.

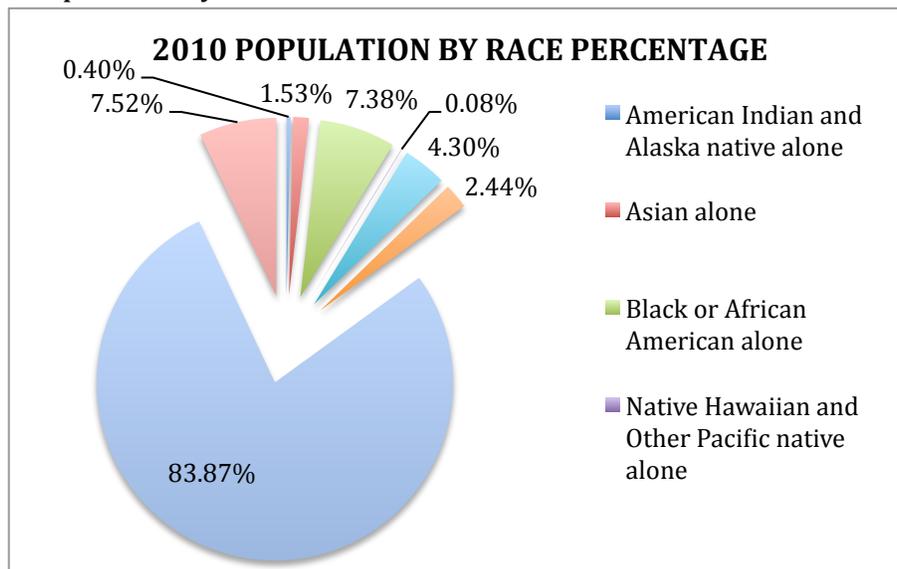
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Table 2.3 Race Categories

RACE	2010 CENSUS
American Indian and Alaska native alone	165
Asian alone	630
Black or African American alone	3,048
Native Hawaiian and Other Pacific native alone	35
Some other race alone	1,775
Two or more races	1,008
White alone	34,624
Persons of Hispanic or Latino Origin	3,106

Figure 2.3 Population by Race



There has been a significant increase between 2000 and 2010 in the “Some other race alone” category, as shown below in Table 2.4. Approximately 4.3% of the population is classified in this category, with nearly a 300% increase in population in the last decade. The least amount of population growth in the past decade was the “White alone” group at 3% and secondly with the “Black or African American alone” group at nearly 17%. Other groups have seen at least a 75% or greater increase in the last ten years, including a 187% increase in “Persons of Hispanic or Latin origin”.

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Table 2.4 Race & Population Change

RACE	2010 CENSUS	2000 CENSUS	POPULATION CHANGE	PERCENTAGE CHANGE
American Indian and Alaska native alone	165	85	80	94.12%
Asian alone	630	359	271	75.49%
Black or African American alone	3,048	2,610	438	16.78%
Native Hawaiian and Other Pacific native alone	35	10	25	250.00%
Some other race alone	1,775	481	1,294	269.02%
Two or more races	1,008	557	451	80.97%
White alone	34,624	33,777	847	2.51%
Persons of Hispanic or Latino Origin	3,106	1,080	2,026	187.59%

Data: 2010 US Census

Employment & Income

Other demographic data includes a review of employment and income data in the city of Cleveland. As shown in Table 2.5, over 60% of the population 16 years and over is in the labor force with 53% employed. Overall, the city experienced a 12% unemployment rate as late as 2012 according to the ACS 2008-2012 estimates.

STATUS	TOTAL	PERCENTAGE
Population 16 years and over	33,020	
In labor force	19,892	60.20%
Civilian labor force	19,881	60.20%
Employed	17,504	53.00%
Unemployed	2,377	7.20%
Armed Forces	11	0.00%
Not in labor force	13,128	39.80%
Civilian labor force	19,881	19,881
Percent Unemployed	(X)	12.00%

Data: 2008-2012 American Community Survey

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The US Department of Labor and Statistics in August 2013 reported a 8.5% unemployment rate in the county in comparison to the nation’s unemployment rate at 7.3% in October 2013. There has been a significant decrease in unemployment in the last few years, reported from 12% to 8.5% in data.

Table 2.6 Industry in Cleveland, TN		
INDUSTRY	TOTALS	PERCENTAGE
Civilian employed population 16 years and over	17,504	
Agriculture, forestry, fishing and hunting, and mining	124	0.70%
Construction	1,010	5.80%
Manufacturing	2,502	14.30%
Wholesale trade	299	1.70%
Retail trade	2,152	12.30%
Transportation and warehousing, and utilities	698	4.00%
Information	404	2.30%
Finance and insurance, and real estate and rental and leasing	969	5.50%
Professional, scientific, and management, and administrative and waste management services	1,336	7.60%
Educational services, and health care and social assistance	4,318	24.70%
Arts, entertainment, and recreation, and accommodation and food services	2,040	11.70%
Other services, except public administration	1,125	6.40%
Public administration	527	3.00%

Data: 2008-2012 American Community Survey

Of the employed individuals in the city, the highest industry category is represented with a quarter of all industries in the “Educational services, and health care and social assistance” category at nearly 24.7%, as shown in Table 2.6. Secondly is the “Manufacturing” category at 14% and thirdly is the “Retail trade” category at 12.3%. Of the represented categories listed in Table 3.6, the “Agriculture, forestry, fishing and hunting, and mining” category is lowest at .7%.

When reviewing the top employers in the city, these percentages are further justified. The Cleveland-Bradley County Chamber of Commerce reports in Table 2.7 that Whirlpool Corporation, Bradley County Schools, and SkyRidge Medical Center are the top three employers in Cleveland.

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Table 2.7 City of Cleveland, TN Top Employers (Dec. '12)	
Company	Employment
Whirlpool Corporation, Cleveland Division	1,386
Bradley County Schools (includes cafeteria)	1200
SkyRidge Medical Center	1147
Peyton's Southeastern	950
Lee University	815
Cleveland City Schools	664
Walmart (two stores)	640
Bradley County Government (includes law enforcement and corrections)	620
Amazon	600
Merck Consumer Care (formerly Schering Plough)	537
Mars Snackfood US LLC	495
Life Care Centers of America	450
Olin Corporation	384
Whirlpool Xperience Center (call center)	375
Proctor & Gamble (Duracell)	350
City of Cleveland (not including seasonal part-time)	340
Exel Inc.	340
Coca Cola Refreshments USA	320
Lonza	320
Catnapper/Cleveland Chair	300

Data: Cleveland/Bradley Chamber of Commerce

These top employers only represent approximately 3,000 jobs, of the nearly 17,000 employed individuals living in Cleveland. With such a close proximity to other major cities in East Tennessee (Chattanooga and Knoxville), commuting is also an option. As shown in Table 2.8, over 81% of the employed individuals drive alone to work with a mean travel time of nearly 18 minutes. Commutes could be to the city of Chattanooga only 32 miles away, as well as surrounding cities. There is public transportation available for commuting, but is only used by .2% of employed citizens. Of the workforce estimates in Cleveland, 9% of the laborers carpooled to their employment destinations.

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	TOTAL	PERCENTAGE
Workers 16 years and over	17,284	
Car, truck, or van -- drove alone	14,099	81.60%
Car, truck, or van -- carpooled	1,595	9.20%
Public transportation (excluding taxicab)	37	0.20%
Walked	473	2.70%
Other means	626	3.60%
Worked at home	454	2.60%
Mean travel time to work (minutes)	17.6	(X)

Data: 2008-2012 ACS

Household income also can provide the city with greater details about fair housing policies and procedures. Approximately 58% of the 2010 population in Cleveland is currently employed showing that all income levels are represented in the workforce. Of the 15,757 households reporting in income in Cleveland, the median household income is \$35,736, as indicated in Table 2.9. The income category with the highest percentage of households is between the “\$50,000 to \$74,999” category at 17.3%. Trailing just below at 15.9% is the “15,000 to \$24,999” category.

Category	Totals	Percentage
Total households	15,757	
Less than \$10,000	1,979	12.60%
\$10,000 to \$14,999	1,292	8.20%
\$15,000 to \$24,999	2,500	15.90%
\$25,000 to \$34,999	1,995	12.70%
\$35,000 to \$49,999	2,340	14.90%
\$50,000 to \$74,999	2,733	17.30%
\$75,000 to \$99,999	1,181	7.50%
\$100,000 to \$149,999	1,017	6.50%
\$150,000 to \$199,999	365	2.30%
\$200,000 or more	355	2.30%
Median household income (dollars)	35,736	(X)
Mean household income (dollars)	53,714	(X)

Data: 2008-2012 ACS

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The HUD income limits in Table 2.10 for the area shows the median income limit as well as HUD income limit categories—low, very low, and extremely low income limits. To qualify for HUD programs, a household would make less than \$42,960 (80% of the area median income). According to Table 2.10, over 50% of the total households in Cleveland are considered to be low-income households.

Table 2.10 HUD 2014 Income Limit Categories

FY 2014 Income Limit Area	Median Income	FY 2014 Income Limit Category	Persons in Household							
			1	2	3	4	5	6	7	8
Cleveland, TN MSA	\$53,700	Very Low (50%) Income Limits (\$)	18,150	20,750	23,350	25,900	28,000	30,050	32,150	34,200
		Extremely Low (30%) Income Limits (\$)	10,900	12,450	14,000	15,550	16,800	18,050	19,300	20,550
		Low (80%) Income Limits (\$)	29,050	33,200	37,350	41,450	44,800	48,100	51,400	54,750

Data: HUD

According to the 2008-2012 American Community Survey (ACS) estimates, approximately 9.38% are below the poverty level in Cleveland. The ACS uses an estimated population at 38,489 with 9,172 identified as below the poverty level.

Other considerations include individuals reported disabilities in the city. As Table 2.11 reports, 15.5% of the population reported a disability, which is approximately 6,400 persons. Of the four age categories, the largest percentage of disabled persons is over the age of 65 years old at nearly 48%. The age group between 18 and 64 years old has approximately 12% of its population reporting as disabled. Disability defined by the 2008-2012 American Community Survey (ACS) is individuals reporting hearing, vision, cognitive, ambulatory, self-care, and independent living disabilities.

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Table 2.11 Disability Categories

Subject	Cleveland city, TN; Cleveland, TN Metro Area		
	Total	With a disability	Percent with a disability
	Estimate	Estimate	Estimate
Total civilian noninstitutionalized population	41,092	6,381	15.50%
Population under 5 years	2,659	40	1.50%
Population 5 to 17 years	6,674	528	7.90%
Population 18 to 64 years	26,299	3,212	12.20%
Population 65 years and over	5,460	2,601	47.60%

Data: 2008-2012 ACS

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HOUSING PROFILE

Cleveland currently has 17,868 households with over 88% of them occupied housing units. Of the occupied units, over half of them are renter-occupied at 52% and 48% are owner occupied units, as shown in Table 2.12.

Table 2.12 Housing Occupancy in Cleveland, TN		
HOUSING OCCUPANCY	NUMBER	PERCENTAGE
Total housing units	17,868	
Occupied housing units	15,757	88.20%
Vacant housing units	2,111	11.80%
Homeowner vacancy rate		3.6
Rental vacancy rate		10.2
Owner-occupied	7,518	47.70%
Renter-occupied	8,239	52.30%

Data: 2008-2012 ACS

As shown in Table 2.13, nearly 61% of the housing units in Cleveland are one-unit, detached housing units while nearly 35% are considered to be multi-unit dwellings. A quarter of the multi-unit dwellings are 2 unit structures, possible townhome or duplex type housing. Triplexes, Quadraplexes, and apartment building units with less than 9 units together make up the highest amount of attached dwellings in Cleveland.

Table 2.13 Housing Unit Type by Total & Percentage		
Category	Total	Percentage
Total housing units	17,868	17,868
1-unit, detached	10,837	60.70%
1-unit, attached	493	2.80%
2 units	1,788	10.00%
3 or 4 units	1,538	8.60%
5 to 9 units	1,756	9.80%
10 to 19 units	465	2.60%
20 or more units	646	3.60%
Mobile home	345	1.90%
Boat, RV, van, etc.	0	0.00%

Data: 2010-2012 ACS

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Of the housing stock in Cleveland, the highest percentage of housing units was built between 1990-1999 and 1970-1979 at 19.2% and 19.1%, respectively. Table 2.14 shows how that many of the housing units in the city are over 20 years old and over 50% of the units are at least 40 years old. With such an older housing stock, rehabilitation efforts may be required. With over 50% of households in Cleveland at or below HUD’s low-income standards, additional considerations for rehabilitation efforts may need to be considered.

Category	Total	Percentage
Total housing units	17,868	17,868
Built 2010 or later	43	0.20%
Built 2000 to 2009	2,421	13.50%
Built 1990 to 1999	3,434	19.20%
Built 1980 to 1989	2,441	13.70%
Built 1970 to 1979	3,411	19.10%
Built 1960 to 1969	2,147	12.00%
Built 1950 to 1959	1,657	9.30%
Built 1940 to 1949	1,026	5.70%
Built 1939 or earlier	1,288	7.20%

Data: 2010-2012 ACS

HUD data breaks it down further with owner-occupied and renter-occupied units by year built in Table 2.15. In the past thirty years, renter-occupied units were built more than owner-occupied units. Overall the greatest amount of units was built between 1950-1979, meaning that many of the units could require rehabilitation, especially in low-income areas.

Table 2.15 Owner/Renter Occupied Housing & Year Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	855	11%	1024	12 %
1980-1999	2197	28%	3092	38%
1950-1979	3712	47%	3174	39%
Before 1950	1115	14%	934	11%
TOTAL	7879	100%	8224	100%

Data: 2006-2010 CHAS/IDIS

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As Table 2.15 mentioned above, nearly 61% of the housing stock (10,827) in Cleveland are owner occupied units. Table 2.16 below shows the highest percentage of housing value is 23% in the \$100,000-\$149,999 category. Second highest is the category between \$150,000-\$199,999. The median housing value is \$155,200.

Table 2.16 HOUSING VALUE		
Owner-occupied units	7,518	7,518
Less than \$50,000	519	6.90%
\$50,000 to \$99,999	1,341	17.80%
\$100,000 to \$149,999	1,729	23.00%
\$150,000 to \$199,999	1,454	19.30%
\$200,000 to \$299,999	1,401	18.60%
\$300,000 to \$499,999	693	9.20%
\$500,000 to \$999,999	324	4.30%
\$1,000,000 or more	57	0.80%
Median (dollars)	155,200	(X)

Data: 2010-2012 ACS

Renter occupied housing units make up 52% of the total occupied housing units in the city. The median rent is nearly \$670 per month, as shown in Table 2.17. Nearly forty-six percent of the renter occupied units paid between \$500-\$749 per month while 33% of households paid more than \$749 and 22% paid less than \$500 per month.

Table 2.17 GROSS RENT		
Occupied units paying rent	7,724	7,724
Less than \$200	292	3.80%
\$200 to \$299	332	4.30%
\$300 to \$499	1,038	13.40%
\$500 to \$749	3,547	45.90%
\$750 to \$999	1,617	20.90%
\$1,000 to \$1,499	718	9.30%
\$1,500 or more	180	2.30%
Median (dollars)	669	(X)
No rent paid	515	(X)

Data: 2010-2012 ACS

When evaluating mortgages and rents in the area, it is important to evaluate the housing costs with overall gross annual income. HUD suggests that households paying more than 30% of their income on housing costs (mortgage/rent payments

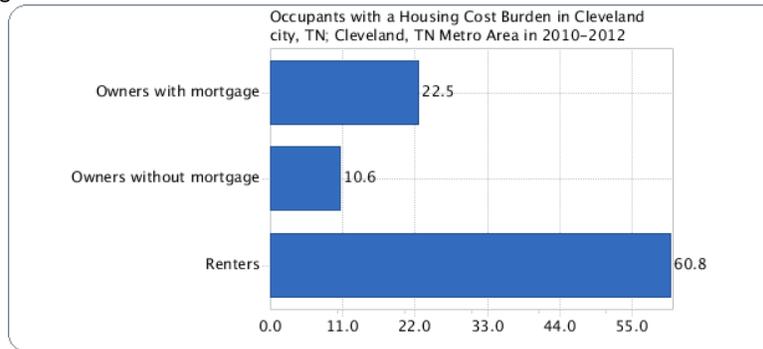
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and utilities) are cost-burdened. The US Census provided a cost burdened analysis in its housing evaluation, shown in Figure 2.4 below. Renters are considered to be the most cost-burdened at nearly 61%, while owners with mortgages rank second at approximately 23%.

Figure 2.4 Housing Cost Burden in Cleveland,

The median monthly housing costs for mortgaged owners was \$1,202, nonmortgaged owners \$387, and renters \$694. Twenty-three percent of owners with mortgages, 11 percent of owners without mortgages, and 61 percent of renters in Cleveland city, TN; Cleveland, TN Metro Area spent 30 percent or more of household income on housing.

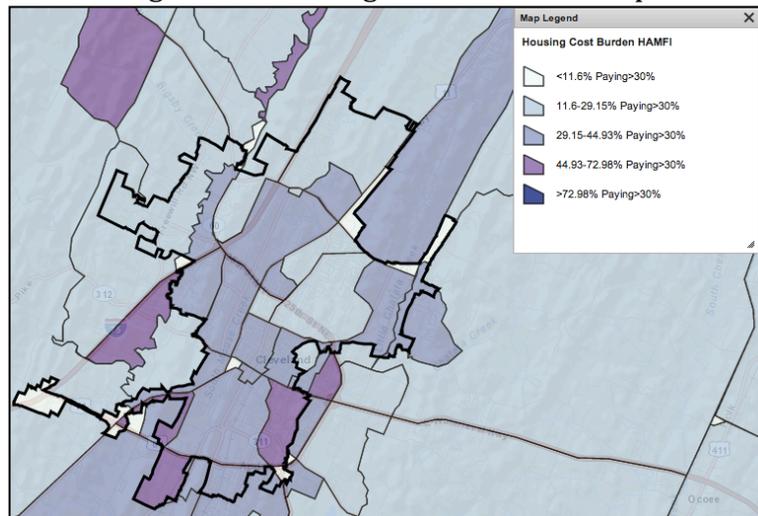


(X) = Data item not available

Source: U.S. Census Bureau, 2010-2012 American Community Survey

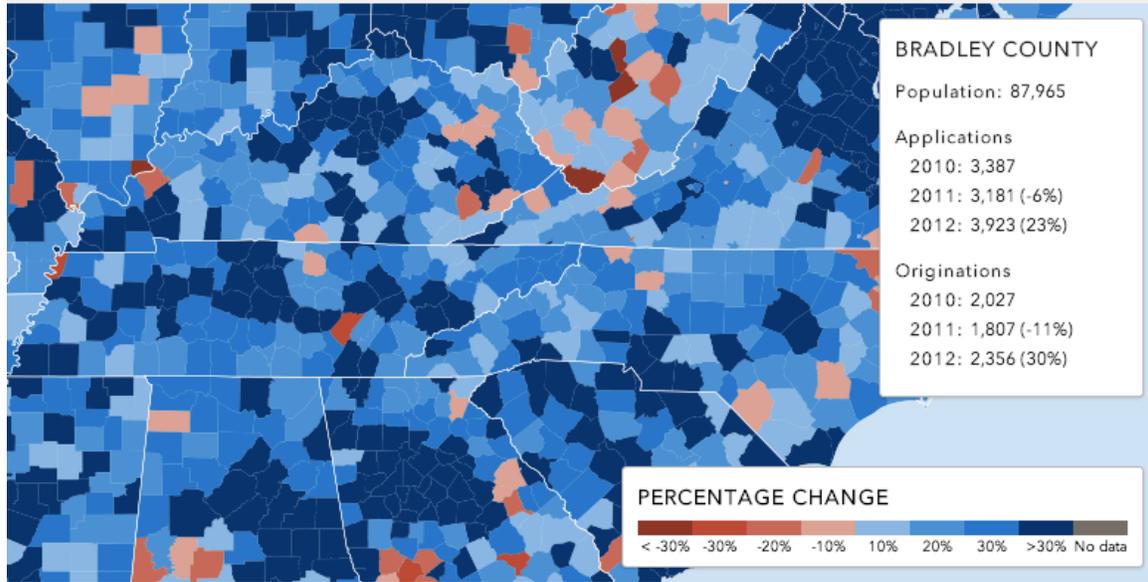
As Figure 2.5 shows, most of the census tracts have at 29% of its population considered to be cost burdened. There are several areas indicated in the map with nearly 45% of its population cost burdened.

Figure 2.5 Housing Cost Burdened Map



Map: HUD CHAS 2006-2010 ACS

Home Mortgage Disclosure Act (HMDA) Data



Map: Consumer Finance Protection Bureau (consumerfinance.gov)

There has been a significant increase in loan applications and originations in Bradley County up from -6% and -11%, respectively from 2010. In 2012, loan applications were up by 23% and 30%, respectively. As shown in Table 2.18, a substantial majority of loan applications were made to Whites in 2012, with 355 loans originated and only 8 loans originated by minorities.

Table 2.18 HMDA Loan Applications

Action taken	Applicant race	Number of records
Loan originated	American Indian or Alaska Native	1
Loan originated	Asian	4
Loan originated	Black or African American	2
Loan originated	Native Hawaiian or Other Pacific Islander	1
Loan originated	White	355

2012 Consumer Finance Protection Bureau (Cleveland, TN)

According to 2000 data from DataPlace.org, the City of Cleveland ranked 20th lowest in homeownership rates across the state. Additionally, it ranked 3rd highest on loan denials to middle income mixed race pairs for conventional loans and 4th highest

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percentage of loans for multifamily dwellings. The city also had the 8th highest percentage of housing units in structures with 2 to 4 units.

Table 2.19 provides percentages for home loans by race in 2007 based on HMDA data from DataPlace in the city of Cleveland alone. Nearly 91% of home purchase loans were to Whites, while only 9% were loans made to minorities. The highest minority group receiving home purchase loans was Hispanics at 4.5%. Table 2.19 also confirms the lack of loans made to Non-Hispanic multiracial borrowers in 2007 at 0%.

Table 2.19 Home purchase loans by race	
Pct. of owner-occ. home purchase loans to Asian/Pac. Islanders (2007)	1.6%
Pct. of owner-occupied home purchase loans to Blacks (2007)	2.5%
Pct. of owner-occupied home purchase loans to Hispanics (2007)	4.5%
Pct. of owner-occupied home purchase loans to minorities (2007)	9.3%
Pct. of owner-occupied home purchase loans to Native Americans (2007)	0.2%
Pct. of owner-occupied home purchase loans to Whites (2007)	90.7%
Pct. of owner-occupied home purchase mortgage to mixed race pairs (2007)	0.5%
Pct. owner-occ. purch. loans to non-Hisp. multiracial borrowers (2007)	0.0%

Data: 2007 HMDA data from DataPlace.org

Table 2.20 provides a summary of loan denials by race, which provides greater detail into mortgage lending practices in the city of Cleveland. For example, home purchase loans to mixed race borrowers were denied at 50%, with only 0.5% loans approved in 2007. Hispanic applicants were the second highest race of loan denials at 41%, yet they had the highest percentage of home purchase loans. Overall when reviewing mortgage loan denials, there is a greater denial rate among minority groups than white applicants.

Table 2.20 Loan denials by race	
Denial rate of conv. home purchase loans to Asian applicants (2007)	8.3%
Denial rate of conv. home purchase loans to Black applicants (2007)	22.2%
Denial rate of conv. home purchase loans to Hispanic applicants (2007)	41.2%
Denial rate of conv. home purchase loans to minority applicants (2007)	30.0%
Denial rate of conv. home purchase loans to mixed race pairs (2007)	50.0%
Denial rate of conv. home purchase loans to Native Americans (2007)	0.0%
Denial rate of conv. home purchase loans to White applicants (2007)	14.5%
Denial rate of conv. purch. loans to non-Hisp. multiracial appl. (2007)	N/V

Data: 2007 HMDA data from DataPlace.org

Additionally, according to DataPlace there were 15.4% of conventional home purchase loans that are considered to be high cost loans and 11.3% of conventional home purchase loans approved by subprime lenders in Cleveland in 2005.

III. Evaluation of Jurisdiction's Current Fair Housing Legal Status

The State of Tennessee's fair housing law has received substantial equivalence certification from HUD. This certification indicates that the State has a fair housing law that provides substantive rights, procedures, remedies and judicial review provisions that are substantially equivalent to the federal Fair Housing Act and has the capacity to enforce it. The Tennessee Human Rights Commission (THRC) handles this function for the state.

The THRC has a cooperative agreement with both HUD and the Equal Employment Opportunity Commission (EEOC) that allows for the coordination of investigations of discrimination cases and avoid duplication in efforts to end discrimination. THRC's central office is located in Nashville with regional offices in Memphis, Knoxville, and Chattanooga. From the THRC website:

The Commission is an independent state agency responsible for enforcing the Tennessee Human Rights Act and the Tennessee Disability Act which prohibit discrimination in housing, employment, and public accommodation on the basis of race, color, creed, national origin, religion, sex, disability, familial status (housing only) and age (40 and over in employment). The Commission is also responsible for coordinating the State of Tennessee's compliance with Title VI of the Civil Rights Act of 1964 which prohibits discrimination based on race, color and national origin by State agencies receiving federal financial assistance.

The City of Cleveland has had only 12 reported cases of discrimination reviewed by HUD in the past 10 years, as detailed in Table 3.1. The majority of the cases investigated were related to the disability protected class, with race, national origin, and familial status classes listed as the basis. Many of the cases investigated were found to have "No Cause" with several of them conciliated and settled.

There was one discrimination case reported in 2013 citing National Origin as the basis for the complaint. With the small amount of cases investigated, the public may not be aware of how or where to report discrimination matters related to housing.

ANALYSIS OF IMPEDIMENTS STUDY TO FAIR HOUSING CHOICE

Cleveland, TN

Table. 3.1 City of Cleveland HUD Fair Housing Complaints 2003-2013				
No	HUD Filing Date	Basis	Issues-Codes	Issues-Codes
1	8/20/2004	Familial Status	322-Discriminatory advertisement-rental	16-Conciliated/ Settled
2	4/4/2005	Race	382-Discrimination in terms/conditions/privileges relating to rental	25-No Cause
3	10/20/2006	Disability	310-Discriminatory refusal to rent, 332-False denial or representation of availability-rental	25-No Cause
4	9/16/2008	Disability	500-Failure to permit reasonable modification, 510-Failure to make reasonable accommodation	16-Conciliated/ Settled
5	3/12/2008	National Origin	310-Discriminatory refusal to rent, 382-Discrimination in terms/conditions/privileges relating to rental	25-No Cause
6	8/19/2008	Disability	310-Discriminatory refusal to rent	25-No Cause
7	12/23/2008	Disability	450-Discriminatory acts under Section 818 (coercion, Etc.).	25-No Cause
8	8/11/2009	Race	310-Discriminatory refusal to rent, 332-False denial or representation of availability-rental, 382-Discrimination in terms/conditions/privileges relating to rental	6-Withdrawal Without Resolution
9	4/19/2011	National Origin, Religion, Color	320-Discriminatory advertising, statements and notices, 382-Discrimination in terms/conditions/privileges relating to rental	16-Conciliated/ Settled
10	8/29/2011	Disability	500-Failure to permit reasonable modification	16-Conciliated/ Settled
11	10/24/2011	Race	320-Discriminatory advertising, statements and notices, 382-Discrimination in terms/conditions/privileges relating to rental, 450-Discriminatory acts under Section 818 (coercion, Etc).	16-Conciliated/ Settled
12	3/19/2013	National Origin	384-Discrimination in services and facilities relating to rental	16-Conciliated/ Settled

ANALYSIS OF IMPEDIMENTS STUDY TO FAIR HOUSING CHOICE

Cleveland, TN

A survey was disseminated in public offices and nonprofits to gather input from citizens on barriers to affordable housing and fair housing. Table 3.2 provides the responses of the survey.

Table 3.2 Fair Housing Survey Responses

Fair Housing Choice Questions (Survey Responses)	Yes	No
Have you experienced any fair housing issues in Cleveland?	3	44
Realtors in Cleveland steer families away from South Cleveland causing a problem getting decent, normal people to move to that side of town.		
Broken water pipes; no heat or air; pest control problems; bed bugs; "slum lords"; Every summer, children through Baptist Assoc. comes to Cleveland to fix property. Lack of codes enforcement.		
Lived in housing now, had problems with children as teenagers and the past housing gave a bad reference, angry because I appealed decision; discriminate on disability.		
Have you seen or heard information regarding fair housing laws, programs, and enforcement within the City of Cleveland?	8	38
If yes, please explain where: Various locations banks, govt offices; Cleveland Housing Authority Program Briefings People rights are never spoken of; and they don't know their rights.		
After reading the definitions above, what impediments to fair housing choice are there?		
Cost; Local persons need to be retrained on how they view S. Cleveland; People also need to be assisted in the south side-There are no recycle areas near us; bus stops are needed with covers, sidewalks		
Not enough codes enforcement/policing of slum lords		
Very expensive rents		
Need for more bank credit		
As a program, we have seen some subtle discrimination towards some of the clients we serve.		
Discrimination, people with records, being fair in housing, if every effort is taken to obey rules and regulations why deny them? People on disability can afford housing due to income, using biased means to deny housing.		
Any suggestions for the City of Cleveland to address fair housing issues?		
The North Cleveland Towers seems to be a very good situation. Management has made it what it is.		
Keep rent low enough so people who earn minimum wage can have adequate living.		
Needs more control of who goes into public housing. One person gets housing and 6-8 people move in who are not supposed to be there. They wander the streets causing problems/stealing.		
Force rental property owners to adhere to higher standards.		
Very expensive rents		
Need more bank credit		
Families get struck in poor housing due to lack of deposit money. Then lends to week to week rental and then never able to address deposit needs.		
Single expectant parent cannot work, no housing options		
Provide some education to managers of low-income rental properties.		
Have a fair and unbiased management, that goes by the rules and regulations, and does not use office for their power.		
Build more low income housing.		

The responses show an overall need for more public awareness to fair housing laws and complaint procedures. A large majority of the respondents (84%) had not seen information related to fair housing laws before the survey. Additionally, the comments received reflect a need for public and private sectors to focus on fair housing including government offices, financial institutions, and landlords.

IV. IMPEDIMENTS TO FAIR HOUSING CHOICE

Public Sector

Zoning and Site Selection

The city's zoning ordinance provides guidance on promoting the general welfare for the community through its zoning laws and regulations. The zoning ordinance can be an impediment to fair housing choice if definitions are not clear or present a challenge to creating and developing housing for all.

The City of Cleveland's definition of "rooming house" provides an exception for a "qualifying relations" for group homes. It states, "group homes for the disabled with not more than two (2) live-in caregivers." The Tennessee Code Annotated defines family below:

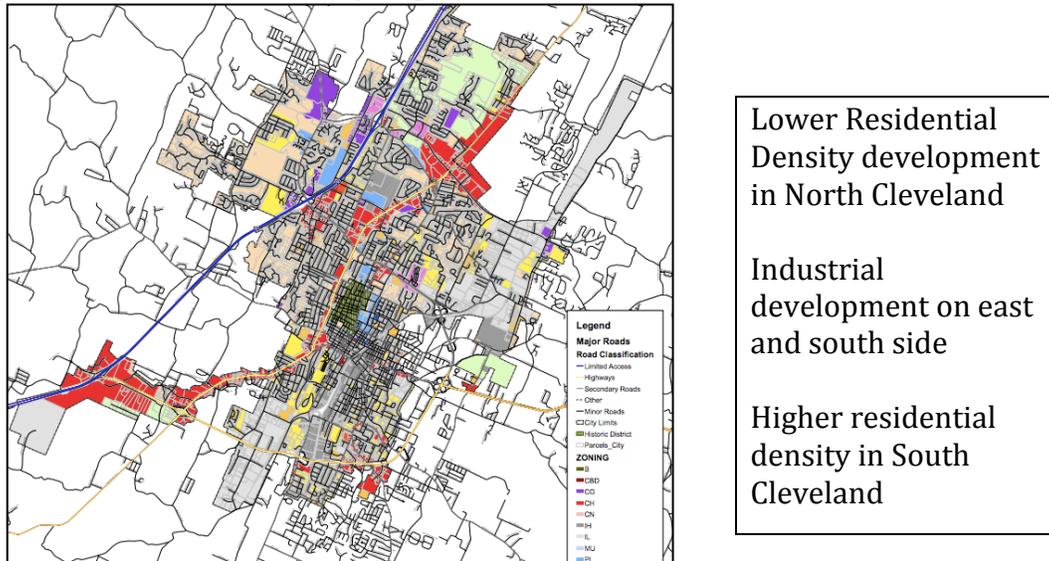
For the purposes of any zoning law in Tennessee, the classification single family residence includes any home in which eight (8) or fewer unrelated mentally retarded, mentally handicapped or physically handicapped persons reside, and may include three (3) additional persons acting as houseparents or guardians, who need not be related to each other or to any of the mentally retarded, mentally handicapped or physically handicapped persons residing in the home.

This definition should be revised to reflect the state's definition to ensure group homes are legally available and consistent with state law.

Additionally, there were no provisions for halfway houses or recovery communities in the zoning ordinance. This type of housing allows for persons recovering from an addiction or inmates to return to a safe and decent form of housing to end the cycle.

Site selection for future development will most likely be located in the northern section of the city, which could impede fair housing choice. *Policies should be geared to provide various housing types in all segments to allow for affordability in areas outside of most concentrated area of affordable housing. Affordable housing options should be provided in North and South Cleveland.*

Figure 4.1 Cleveland's Zoning Map



Neighborhood Revitalization, Municipal and Other Services, Employment-Housing-Transportation Linkage

A neighborhood revitalization effort has started in the Blythe area in the southern portion of Cleveland with the assistance of the local United Way. Currently one person staffs the Blythe Neighborhood Revitalization Initiative in hopes of addressing the need in that area. This neighborhood is also located with the CDBG target area, south of downtown.

The Cleveland Comprehensive Plan proposes future land use recommendations for nine areas in Cleveland and surrounding urban growth areas. New development recently has occurred primarily north of downtown. Growth is expected to increase in these areas due to the availability of development ready infrastructure connections.

As indicated in the Comprehensive Plan, 45% of population growth is expected in the city over the next 25 years. There currently is not enough vacant land to handle the expected growth, as listed below in Figure 4.1. Infill development and annexation may be possibilities to handle the expected population growth.

Cleveland, TN

<p>Total Population Increase</p> <ul style="list-style-type: none">• 32,000 new residents estimated county-wide• 14,400 new residents estimated for Cleveland• County-wide population is estimated to reach 131,212 by 2035 <p>Estimated New Housing Demand</p> <ul style="list-style-type: none">• 14,000 new homes estimated county-wide• 6,300 new homes estimated for Cleveland <p>Estimated New Jobs</p> <ul style="list-style-type: none">• 19,000 new jobs estimated county-wide

Several industries have moved into the regional context, which requires a regional approach to transportation and housing. Both the Volkswagen and Wacker Chemie plants are new industries that have recently located to the regional area. With newer industries in the area, commuting and transportation efforts may become a priority for the city.

PHA and Other Assisted/Insured Housing Provider Tenant Selection Procedures; Housing Choices for Certificate and Voucher Holders

The Cleveland Housing Authority currently owns housing units for 434 families including units for elderly and disabled individuals in the Southeast portion of Cleveland. Tenants currently pay no more than 30% of their income on rents while HUD subsidizes the remaining cost of the units.

The Section 8 Housing Choice Voucher program currently serves 208 families. Housing Quality Standards (HQS) are used to qualify units for the S8/HCV program with annual inspections.

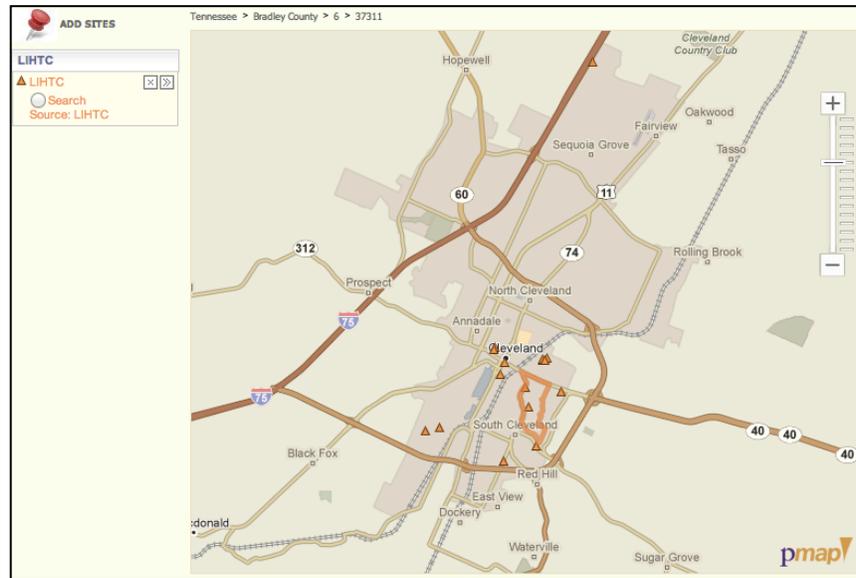
Interested applicants can review the website for vacancies for public housing and Section 8 and also download the printable application. Public housing applicants are usually on the waiting list for up to six months.

Figure 4.2 shows the amount of Low Income Housing Tax Credit (LIHTC) projects in the Cleveland area, located primarily in South Cleveland. There are approximately 13 projects in this area with some of the developments included in Cleveland Housing Authorities unit count.

ANALYSIS OF IMPEDIMENTS STUDY TO FAIR HOUSING CHOICE

Cleveland, TN

Figure 4.2 Low Income Housing Tax Credits in Cleveland, TN



Sale of Subsidized Housing and Possible Displacement

With such a high demand of subsidized housing and affordable housing, there is no sale or possible displacement expected.

Property Tax Policies

As of July 2013, city of Cleveland's property tax rate is \$1.7655 per \$100 of assessed value. Taxpayers living within the city's limits will also pay the county's tax rate. This rate was increased by 6% by a State mandated appraisal.

Planning and Zoning Boards

The municipal Planning Commission has 9 members with one representative from the Mayor's office and the others appointed by the mayor. The term for each member is three years. The purpose of this commission is to guide development in a coordinated and harmonious way promoting public health and safety of the general welfare of Cleveland. The Commission prepares and adopts a general land use plan, make advisory reports and recommendations on public project mandatory referrals, zoning amendments, and zoning and subdivision proposals. The Planning Commission meets monthly.

The Board of Zoning Appeals is made up of 5 persons appointed by City Council. This board hears and decides on appeals and special exceptions of the ordinance. The board meets monthly.

Building Codes (Accessibility)

The city uses the North Carolina State Building Code, Volume 1-C, Accessibility Code 2002 Edition with 2004 Amendments for its accessibility standards. These standards are acceptable for accessibility concerns.

Private Sector

In January 2014, a new set of mortgage lending rules went into affect for financial institutions to protect existing and potential homebuyers from risky lending. The Consumer Financial Protection Bureau outlines these mortgage rules as follows:

1. Lenders must be clear about where your money goes. Lenders are to provide a monthly billing statement outlining remaining balance, escrow amounts, and any service or transactional fees.
2. Interest rate changes have to be made apparent before it happens.
3. Lenders must intervene if a payment is missing after 36 days. Typically, the foreclosure process takes over 400 days. This will help to mitigate any requests for smaller payments.
4. Lenders must limit points and fees to no more than 3% of the loan amount. Lenders cannot promote risky features that go beyond 30 years or provide teaser rates that are interest only.
5. Debt to income ratios are critical to approving loans with the “ability-to-pay rule.” Borrowers cannot exceed a 43% debt to income ratio when applying for a mortgage.

These rules may prevent some homebuyers from qualifying for a mortgage, however homebuyer and financial counseling will be necessary to prepare potential homebuyers.

Real estate professionals may also continue an unintentional impediment to fair housing choice. If there are only homeownership opportunities available in North Cleveland, realtors are only able to sell in those communities. Also, realtors may be more prone to take on clients that they are sure will receive mortgage lending. If there are not a variety of housing types and homeownership opportunities spread throughout the city, the issue of steering is easily achieved which is illegal and ineffective for Cleveland’s citizens.

Public and Private Sector

Fair Housing Enforcement

The City of Cleveland currently has a website link dedicated to fair housing laws and discrimination complaint procedures. Complaints can come into the city, the Tennessee Human Relations Commission, or the US Department of Housing and Urban Development.

Informational Programs

The City currently attends and promotes the annual Fair Housing Matters Conference held in Middle Tennessee for training in the month of April.

Fair housing information is also mailed to 19,000 homes through utilities statements outlining steps to file a complaint. Many agencies in the city including the Cleveland Housing Authority, Bradley/Cleveland Community Services Agency, Bradley Initiative Credit Union, and Habitat for Humanity of Cleveland also provide fair housing information to its clients and participants. Several of these agencies also provide housing counseling services, including the Bradley/Cleveland CSA, Bradley Initiative Credit Union, and Habitat for Humanity.

Visitability in Housing

Visitability in housing is currently not mentioned in the Zoning Ordinance. The city may review proposals for housing development with visitable standards but it is currently not required. Density bonuses may be an incentive for this type of housing.

A house is considered to be visitable when it has the following standards:

- one zero-step entrance.
- doors with 32 inches of clear passage space.
- one bathroom on the main floor you can get into in a wheelchair.

V. Conclusions and Recommendations

The City of Cleveland has seen a steady increase in population over the last decade. Population increases in minority populations have significantly increased. With the national trend of the aging population and increases in minority populations, it is pertinent to the city to proactively adjust policies and procedures for its continued success. Regional growth is expected creating more need in housing, employment, services, and transportation efforts. The city should continue its current fair housing practices including public outreach and participation in regional fair housing trainings and opportunities. The following lists outlines existing impediments found in the policies and procedures of both the public and private sector.

IMPEDIMENTS & RECOMMENDATIONS

1. Lack of public awareness of fair housing laws.

Although the city currently has a fair housing program, additional efforts are needed to educate and disseminate information regarding fair housing laws and complaint procedures.

Recommendations:

1. The city should review HUD's Fair Housing/Equal Opportunity website for public awareness options customized for the city.
2. The city should work with public and private sector partners to disseminate information to their customers, tenants, and clients. An example would be to work with the school system to disseminate information to families about fair housing laws and complaint procedures.
3. The city should create a task force that meets at least quarterly made up of city officials, financial institutions, real estate professionals, nonprofits, and citizens to address impediments and implement strategies.

2. Southside of Cleveland is currently concentrated with low-income households and affordable housing developments.

Low-income families do not have a choice in where they will live due to the affordability of the housing in the Southern sector of the city.

Recommendations:

1. Efforts should be made to increase affordable housing efforts outside of Census Tracts 103, 104, 107, and 108.
2. The city should work with non-profit and for-profit developers to discuss a strategy for creating housing opportunities in areas outside of South Cleveland.
3. The city should work with regional housing developers and nonprofits to increase affordable housing development.

3. Mortgage lending practices are to be addressed since there were high denial rates among certain races.

HMDA data revealed that most denials were with mixed race and Hispanic households. The Hispanic population is the second highest population and had the second highest denial rate.

Recommendations:

1. The city should discuss with financial institutions about the HMDA data and determine what may be the issue and create
2. Financial institutions may need to investigate further and work with the city and interested nonprofits on homebuyer counseling programs locally and regionally.

3. The city should partner with minority groups to improve awareness of new mortgage lending regulations and information gathered from financial institutions.

4. Limited English Proficiency is lacking with city's website and systems for disseminating information.

During the AI process, contact was made with a local translator service (Spanish) that may be used for additional translation services for documents, mail-outs, website, and other pertinent information. There are other large race populations that may require information to be disseminated in other languages and should be accommodated accordingly.

Recommendations:

1. For greater awareness for all its citizens, the city should work with local minority groups and any groups with limited English proficiency for inclusion purposes.
2. The city should have a resource available for translation services or a contact for dissemination of materials.

5. Lack of community and neighborhood organization groups.

Neighborhood organization groups are great for local governments to disseminate information easily and frequently. The city currently has only one organized, active neighborhood group in South Cleveland in the Blythe neighborhood.

Recommendations:

1. The city should make an effort to address the lack of collective bodies by creating a database of contact information for various parts of town.
2. The city should also work with other regional bodies to determine practices for neighborhood organization.

6. Lack of landlord/tenant coordination and information.

Landlord/tenant issues are often reasons that discrimination complaints are not filed. Often tenants living in low-income units need the shelter and are afraid of eviction acts by landlords. Tenants should be aware of their rights to ensure that fair and legal housing is achieved. Additionally, landlords are not always familiar with the landlord/tenant act or fair housing laws.

Recommendations:

1. The city should disseminate fair housing information to landlords as often as possible.
2. Trainings should be provided at least once a year on both the Landlord Tenant Act and fair housing laws. If regional efforts are in place for training, information regarding the training should be provided to landlords.
3. The city should work to create a registry or database listing landlords or repeat code offenders and create an enforcement remedy.

APPENDIX

1. Consolidated Plan Questionnaire & Results
2. Supplemental Information provided by the City of Cleveland
3. HMDA Data—Cleveland, TN/Bradley County, TN
4. Public Outreach efforts—See 2014-2019 Consolidated Plan Appendix

PLEASE COMPLETE THE QUESTIONNAIRE FOR INPUT FOR THE CITY OF CLEVELAND'S 2014-2019 CONSOLIDATED PLANNING PROCESS.

AFFORDABLE HOUSING

PLEASE USE THE LETTERS BELOW TO INDICATE YOUR ANSWER FOR THE FOLLOWING STATEMENTS.

SD--Strongly Disagree

A--Agree

D--Disagree

SA--Strongly Agree

NA--Neither Agree nor Disagree

- 1. ____ There is enough affordable housing in Cleveland.
- 2. ____ Language barriers make it hard to find affordable housing.
- 3. ____ I experience discrimination when looking for affordable housing.
- 4. ____ There are ample affordable housing options in my neighborhood.
- 5. ____ There is sufficient public transportation near affordable housing.
- 6. ____ Public schools are satisfactory near affordable housing.
- 7. ____ There are ample affordable housing options that are suited for households with disabilities.
- 8. ____ There are ample affordable housing options that are suited for elderly persons over the age of 65.
- 9. ____ There are ample affordable housing options that are suited for large family households (4-5 BR housing).
- 10. ____ The conditions of affordable housing are suitable.
- 11. ____ Ample jobs are available in Cleveland pay enough to afford housing costs.
- 12. ____ Poor credit keeps me from obtaining affordable owner occupied housing.

13. WHAT ARE THE BARRIERS TO AFFORDABLE HOUSING IN CLEVELAND, IF ANY?

- ____ N/A
- ____ Development costs (zoning, subdivision fees)
- ____ NIMBYism (Not In My Back Yard)
- ____ Not an interest of area developers
- ____ Lack of funding for interested developer
- ____ Lack of need
- ____ Lack of housing option types so find other jurisdictions
- ____ Current zoning pattern
- ____ Lack of public transportation to employment center

OTHER: _____

14. PROVIDE COMMENTS, FEEDBACK, OR SUGGESTIONS (below) FOR THE CITY RELATED TO AFFORDABLE HOUSING NEEDS.

Analysis of Impediments Study to Fair Housing Choice

This questionnaire is intended for input and guidance for the City of Cleveland's programs, procedures, and policies related to Fair Housing choice.

DEFINITIONS:

Analysis of Impediments Study to Fair Housing Choice (AI)

1. To identify impediments to fair housing choice within the City of Cleveland
2. Take appropriate actions to overcome the effects of any impediments identified through the analysis
3. Maintain records reflecting the analysis and actions taken in this regard

Fair Housing Act

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on **race, color, national origin, religion, sex, familial status** (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and **disability**.

Impediments

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

15. HAVE YOU EXPERIENCED ANY FAIR HOUSING ISSUES IN CLEVELAND? Please circle your answer.

YES NO

If yes, please explain where and how:

16. HAVE YOU SEEN OR HEARD INFORMATION REGARDING FAIR HOUSING LAWS, PROGRAMS, AND ENFORCEMENT WITHIN THE CITY OF CLEVELAND? Please circle your answer.

YES NO

If yes, please explain where:

17. AFTER READING THE DEFINITIONS ABOVE, WHAT IMPEDIMENTS TO FAIR HOUSING CHOICE ARE THERE IN CLEVELAND?

18. ANY SUGGESTIONS FOR THE CITY OF CLEVELAND TO ADDRESS FAIR HOUSING ISSUES?

COMMUNITY DEVELOPMENT NEEDS

19. THE LIST BELOW IS CURRENT GOALS OF THE CITY OF CLEVELAND. RATE THESE GOALS FROM 1-4 WITH 4 BEING THE HIGHEST.

_____Recreational public facility improvements to improve the quality of life in LMI neighborhoods.

_____Code enforcement to improve the appearance of neighborhoods and provide economic stability.

_____Acquisition of property within the LMI target area for affordable housing.

_____Planning to provide improved coordination of resources and maximize efficiency.

20. ARE THERE ANY GOALS THE CITY SHOULD BE CONSIDERING RELATED TO COMMUNITY DEVELOPMENT NEEDS IN YOUR SPECIFIC NEIGHBORHOOD? PLEASE INCLUDE THE NAME OF YOUR NEIGHBORHOOD IN YOUR DESCRIPTION.

Consolidated Plan Questionnaire Results

AFFORDABLE HOUSING	SD	D	NA	A	SA	Total
There is enough affordable housing in Cleveland.	22	18	6	9	1	56
Language barriers make it hard to find affordable housing.	5	18	15	16	2	56
I experience discrimination when looking for affordable housing.	11	15	28	1	1	56
There are ample affordable housing options in my neighborhood.	8	14	15	19	0	56
There is sufficient public transportation near affordable housing.	7	19	10	18	2	56
Public schools are satisfactory near affordable housing.	5	8	5	33	5	56
There are ample affordable housing options that are suited for households with disabilities.	15	24	17	0	0	56
There are ample affordable housing options that are suited for elderly persons over the age of 65.	10	24	12	10	0	56
There are ample affordable housing options that are suited for large family households (4-5 BRs).	12	22	12	10	0	56
The conditions of affordable housing are suitable.	13	17	8	18	0	56
Ample jobs are available in Cleveland pay enough to afford housing costs.	7	26	4	17	2	56
Poor credit keeps me from obtaining affordable owner occupied housing.	11	6	26	9	4	56
						0
WHAT ARE THE BARRIERS TO AFFORDABLE HOUSING IN CLEVELAND?						
N/A	9					9
Development costs (zoning, subdivision fees)	13					13
NIMBYism (Not In My Back Yard)	23					23
Not an interest of area developers	16					16
Lack of funding for interested developers	19					19
Lack of need	3					3
Lack of housing option types so find other jurisdictions	9					9
Current zoning pattern	5					5
Lack of public transportation to employment center	15					15
Not informed enough to identify barriers	1					1
No answer	11					11
Provide comments, feedback or suggestions for the city related to affordable housing needs.						
available (bedrooms).						

Perhaps a stabilized rent based on income.
 units can be 1-2 years. Most of our complexes for low income families have no elevator.
 Housing manager using their authority to discriminate, obtaining jobs that will help afford housing and have money left

Fair Housing Choice Questions (Survey Responses)	Yes	No
Have you experienced any fair housing issues in Cleveland?	2	42
<p>Realtors in Cleveland steer families away from South Cleveland causing a problem getting decent, normal people to move to that side of town.</p> <p>Broken water pipes; no heat or air; pest control problems; bed bugs; "slum lords"; Every summer, children through Baptist Assoc. comes to Cleveland to fix property. Lack of codes enforcement</p>		
Have you seen or heard information regarding fair housing laws, programs, and enforcement within the City of Cleveland?	7	36
<p>If yes, please explain where: Various locations banks, govt offices; Cleveland Housing Authority Program Briefings</p>		
After reading the definitions above, what impediments to fair housing choice are there?		
<p>Cost; Local persons need to be retrained on how they view S. Cleveland; People also need to be assisted in the south side-There are no recycle areas near us; bus stops are needed with covers, sidewalks</p> <p>Not enough codes enforcement/policing of slum lords</p> <p>Very expensive rents</p> <p>Need for more bank credit</p> <p>As a program, we have seen some subtle discrimination towards some of the clients we serve.</p>		
Any suggestions for the City of Cleveland to address fair housing issues?		
<p>The North Cleveland Towers seems to be a very good situation. Management has made it what it is.</p> <p>Keep rent low enough so people who earn minimum wage can have adequate living.</p>		

Needs more control of who goes into public housing. One person gets housing and 6-8 people move in who are not supposed to be there. They wander the streets causing problems/stealing.
Force rental property owners to adhere to higher standards.
Very expensive rents
Need more bank credit
Families get struck in poor housing due to lack of deposit money. Then lends to week to week rental and then never able to address deposit needs.
Single expectant parent cannot work, no housing options
Provide some education to managers of low-income rental properties.

The list below is current goals of the City of Cleveland. Rate these goals from 1-4 with 4 being the highest.	1	2	3	4
Recreational public facility improvements to improve the quality of life in LMI neighborhoods.	11	9	15	13
Code enforcement to improve the appearance of neighborhoods and provide economic stability.	10	12	9	17
Acquisition of property within the LMI target area for affordable housing.	12	16	11	9
Planning to provide improved coordination of resources and maximize efficiency.	7	14	12	16

Are there any goals the city should be considering related to community development needs in your specific neighborhood? Please include the name of your neighborhood in your description.
Blythe neighborhood:
Neighborhood needs codes enforced in rental houses
New housing; rehab existing housing stock;
Need more lighting--Westland Drive
9th Street needs sidewalk

Blythe, King Edward, Chipperwok, Wilson need a good park-on Par with Tinsley
Extend greenway along creek in abandoned building and whirlpool properties
Many rentals in Blythe area are not furnished with stoves, refrigerators-landlords still charge large fees
Windows falling out of rental homes in Blythe
Hold landlords accountable for rentals
Look at # rental units by person or family name too many poor units per owner
Look for grants to help
Perhaps employ someone to push through on goals
Goals above seem right on target
Recreation/community center on north side of Cleveland.
The old Whirlpool factory-either a very strategic and cost-effect REUSE, or demolition for the purpose of redevelopment
Job opportunities for low-skilled workers
Transitional housing for people experiencing homelessness
Do something good for Blythe neighborhood once whirlpool exits.
More codeing on the landlords in Blythe area.
White Street--We supposedly have a bus stop in front of our complex. However, tenants have complained that it is dangerous to stand where the bus apparently wants to pick them up. Also, would it be expensive to have covered bus stops along these routes?

MEASURES OF HOUSING DISCRIMINATION AND FAIR HOUSING COMPLAINT HISTORY SUPPORTING THE ANALYSIS OF IMPEDIMENTS TO AFFIRMATIVELY FURTHERING FAIR HOUSING IN THE CITY OF CLEVELAND, TENNESSEE

March 21, 2014

As an entitlement grantee under the Community Development Block Grant (CDBG) program of the United States Department of Housing and Urban Development (HUD), the City of Cleveland is required to affirmatively further fair housing. This mandate stems from Section 808(e)(5) of the Fair Housing Act. CDBG entitlement communities like Cleveland must carry out Fair Housing Planning activities including a required study called an Analysis of Impediments to Affirmatively Furthering Fair Housing, or "AI". To affirmatively further fair housing means to conduct the AI, to take actions to overcome the identified impediments, and to maintain records regarding the AI and the actions taken to overcome the impediments.

The City of Cleveland has hired an independent consultant to produce the AI based upon a Scope of Services determined by the City in response to the HUD *Fair Housing Planning Guide, Volume I*. The AI is to involve, among other things, *an assessment of conditions, both public and private, affecting fair housing choice*. Fair Housing requires the identification of actions, omissions, or decisions that have either the intent or the effect of limiting housing choice on the basis of race, color, religion, sex, disability, familial status, or national origin.

While the consultant will perform most of the work necessary for the AI and produce the report, the City will cooperate in this effort by supplying available data and coordinating meetings with various parties that the consultant will interview. Staff will supplement the efforts of the consultant by supplying historical data on fair housing complaints and by supplying other information that indicates the extent to which racial discrimination may be occurring in the local housing market. Staff proposes to collect and present fair housing complaint data from the Tennessee Human Rights Commission and HUD for Cleveland and Bradley County. Staff intends to present segregation measures generated by the *US2010* project at Brown University. The *US2010* data are the Index of Dissimilarity (D) which measures how one racial group is distributed across census

tracts in relation to other groups, and the Index of Exposure (E) which measures the racial composition of the tract in which the average member of a racial group lives, and the Isolation Index (I) which is the percentage of the racial group in the census tract where the average member of that group lives. Staff also anticipates providing data from *US2010* that show the extent to which racial segregation is explained by differences in household income and per capita income; these data address the average income of neighbors of average members of different racial groups who are themselves low-income, moderate-income, or affluent. Finally, staff anticipates replicating among Cleveland area Census Tracts an analysis described in *Black, White, and Shades of Brown: Fair Housing and Economic Opportunity in the Chicago Region* (Darnell Coleman, Mike Leachman, Phil Nyden, and Bill Peterman for Leadership Council for Metropolitan Open Communities Chicago Illinois, February 1998) based upon the methodology of Harvard Economist John Kain who calculated a “predicted” number of African-Americans in Chicago area municipalities based upon their proportionate share in different income categories, basically eliminating the effects of disparities between income among different racial groups.

PART 1: Fair Housing Complaint Data

Violation State and County	Violation City	HUD or FHAP	HUD Filing Date	Bases	Issues	Closure Reason	Closure Date	Compensation
Tennessee - Bradley County	Cleveland	FHAP	08/20/04	Familial Status,	322 - Discriminatory advertisement - rental,	Conciliated/Settled	11/29/04	
Tennessee - Bradley County	Cleveland	FHAP	04/04/05	Race,	382 - Discrimination in terms/conditions/privileges relating to rental,	No Cause	06/07/05	
Tennessee - Bradley County	Cleveland	FHAP	10/20/06	Disability,	310 - Discriminatory refusal to rent, 332 - False denial or representation of availability - rental,	No Cause	01/05/07	
Tennessee - Bradley County	Cleveland	FHAP	09/16/08	Disability,	500 - Failure to permit reasonable modification, 510 - Failure to make reasonable accommodation,	Conciliated/Settled	02/12/10	
Tennessee - Bradley County	Cleveland	HUD	03/12/08	National Origin,	310 - Discriminatory refusal to rent, 382 - Discrimination in terms/conditions/privileges relating to rental,	No Cause	10/31/08	
Tennessee - Bradley County	Cleveland	FHAP	08/19/08	Disability,	310 - Discriminatory refusal to rent,	No Cause	05/12/09	
Tennessee - Bradley County	Cleveland	FHAP	12/23/08	Disability,	450 - Discriminatory acts under Section 818 (coercion, Etc.),	No Cause	10/14/09	
Tennessee - Bradley County	Cleveland	FHAP	08/11/09	Race,	310 - Discriminatory refusal to rent, 332 - False denial or representation of availability - rental, 382 - Discrimination in terms/conditions/privileges relating to rental,	Withdrawal Without Resolution	09/15/09	
Tennessee - Bradley County	Cleveland	FHAP	04/19/11	National Origin, Religion, Color,	320 - Discriminatory advertising, statements and notices, 382 - Discrimination in terms/conditions/privileges relating to rental,	Conciliated/Settled	06/22/11	
Tennessee - Bradley County	Cleveland	FHAP	08/29/11	Disability,	500 - Failure to permit reasonable modification,	Conciliated/Settled	12/01/11	
Tennessee - Bradley County	Cleveland	FHAP	10/24/11	Race,	320 - Discriminatory advertising, statements and notices, 382 - Discrimination in terms/conditions/privileges relating to rental, 450 - Discriminatory acts under Section 818 (coercion, Etc.),	Conciliated/Settled	04/02/12	\$990
Tennessee - Bradley County	Cleveland	FHAP	03/19/13	National Origin,	384 - Discrimination in services and facilities relating to rental,	Conciliated/Settled	04/17/13	

PART 2: U.S. 2010 Project

U.S. 2010 Project Director John R. Logan of Brown University and Associate Director Brian Stults of Florida State University present this picture of U.S. residential segregation (John R. Logan and Brian Stults. 2011. “The Persistence of Segregation in

the Metropolis: New Findings from the 2010 Census” Census Brief prepared for Project US2010. <http://www.s4.brown.edu/us2010>):

- “Declines in residential segregation between blacks and whites since 2000 continued at about the same pace as in the 1990s. Segregation peaked around 1960 or 1970. Between 1980 and 2000 it declined at a very slow pace, but there were reasons to expect a potential breakthrough since then. The new data show another decade of steady but slow decline.”
- “Hispanics and Asians are considerably less segregated than African Americans, and their segregation levels have remained steady since 1980. In addition, since both these groups are growing, there is a tendency for their ethnic enclaves to become more homogeneous. As a result these groups live in more isolated settings now than they did in 2000, continuing a trend seen since 1980.”
- “The average non-Hispanic white person continued to live in a neighborhood that is very different racially from those neighborhoods where the average black, Hispanic, and Asian live. The average white person in metropolitan American lives in a neighborhood that is 75% white. Despite a substantial shift of minorities from cities to suburbs, these groups have often not gained access to largely white neighborhoods. For example a typical African American lives in a neighborhood that is only 35% white (not much different from 1940) and as much as 45% black. Diversity is experienced very differently in the daily lives of whites, blacks, Hispanics, and Asians.”

Logan and Stults describe an “Index of Dissimilarity” which measures the extent of segregation:

“The standard measure of segregation is the Index of Dissimilarity (D), which captures the degree to which two groups are evenly spread among census tracts in a given city. Evenness is defined with respect to the racial composition of the city as a whole. With values ranging from 0 to 100, D gives the percentage of one group who would have to move to achieve an even residential pattern - one where every tract replicates the group composition of the city. A value of 60 or above is considered very high. For example, a D score of 60 for black-white segregation means that 60% of either group must move to a different tract for the two groups to become equally distributed. Values of 30 to 60 are usually considered moderate levels of segregation, while values of 30 or less are considered low.”

“Demographers typically interpret change either up or down in the following way:

- Change of 10 points and above in one decade - Very significant change
- Change of 5-10 points in one decade - Moderate change
- Below 5 points in one decade - Small change or no real change at all”

“Change can be cumulative, and small changes in a single decade – if they are repeated over several decades – can constitute a significant trend. Therefore we pay

attention not only to what has happened since 2000 but also to the longer term trajectory for each group.”

The authors urge caution in the interpretation of results for smaller cities and for racial groups with smaller populations.

Logan and Stults also describe two exposure measures, one somewhat the mirror image of the other, that are related to the concept of segregation:

“Another widely used measure of segregation is a class of Exposure Indices (P^*) that refers to the racial/ethnic composition of a tract where the average member of a given group lives. Exposure of a group to itself is called the Index of Isolation, while exposure of one group to other groups is called the Index of Exposure. Both range from 0 to 100. For example, an Isolation score of 80.2 for whites means that the average white lives in a neighborhood that is 80.2% white. An Exposure score of 6.7 for white-black exposure indicates that the average white lives in a neighborhood that is 6.7% black”.

“Even if segregation (measured by the Index of Dissimilarity) remains the same over time, growth in a minority population will tend to leave it more isolated - that is, leaving group members in neighborhoods where they are a larger share of the population. But at the same time the minority group’s growth also tends to increase the exposure of non-Hispanic whites to that minority population. These are common phenomena in recent years when the white share of the typical metropolis is declining. Even if there were no change in the distribution of whites and minorities across census tracts (which is what we measure with D), there could be change in each one’s exposure to the other (measured by P^*).”

What do the *US2010* data show regarding racial and ethnic makeup of Cleveland and Bradley County and how it is changing? Bearing in mind the cautions about small areas and small populations, it is evident that some significant changes have occurred. The available data are for the City of Cleveland and the Cleveland Metropolitan Statistical Area (MSA) which includes all of Bradley County and Polk County; however, somewhere around 85% of the MSA population is in Bradley County. The population of Cleveland and the Cleveland MSA remains predominantly Non-Hispanic White, presently accounting for over 80% of the Cleveland population and nearly 90% of the population in the Cleveland MSA; however the share has dropped by about 10% since 1990 in Cleveland and by about 5% since 1990 in the MSA. Between 1990 and 2010, the change in population groups in Cleveland and the Cleveland MSA was as follows: Non-Hispanic White 22.0% and 24.8%; Non-Hispanic Black 59.0% and 69.2%; and Hispanic 612.4% and 554.7%. Over 70% of the MSA’s Non-Hispanic Black population was in Cleveland in 2010 but the percentage has declined since 1990 which, coupled with a higher growth rate in the MSA, indicated that this group’s concentration inside Cleveland relative to the MSA may be declining slightly. Since 1990, the most

phenomenal growth has been among the Hispanic population which as of 2010 was only a little less than the Non-Hispanic Black population inside Cleveland and slightly larger than the Non-Hispanic Black population in the MSA as a whole. While population growth among Non-Hispanic Whites continued to be larger in absolute terms, relative growth was much high among Non-Hispanic Blacks and Hispanics, with growth among Hispanics outpacing growth among Non-Hispanic Blacks in both absolute and percentage terms. In 2010, the concentration of Non-Hispanic Black population and Hispanic population was a little over 4% for both groups in the MSA and roughly double that concentration inside Cleveland. For both the Non-Hispanic Black population and the Hispanic population, about 64% of growth 1990-2010 was inside the City of Cleveland, indicating that growth among these most numerically significant populations is substantially an urban phenomenon within the Cleveland MSA.

**Table 1. RACIAL AND ETHNIC COMPOSITION:
Cleveland TN and Cleveland MSA (Bradley County and Polk County)**

	Total Population		Non-Hispanic White		Non-Hispanic Black		Hispanic		Asian		Other Races	
	Cleveland	MSA	Cleveland	MSA	Cleveland	MSA	Cleveland	MSA	Cleveland	MSA	Cleveland	MSA
1980	26,415	NA	24,196 91.60%	NA NA	1,819 6.90%	NA NA	274 1.00%	NA NA	52 0.20%	NA NA	74 0.30%	NA NA
1990	30,354	87,355	27,548 90.80%	83,244 95.30%	2,148 7.10%	2,871 3.30%	436 1.40%	748 0.90%	138 0.40%	264 0.30%	84 0.30%	228 0.30%
2000	37,192	104,015	32,611 87.70%	96,606 92.90%	2,751 7.40%	3,764 3.60%	1,066 2.90%	1,939 1.90%	428 1.20%	665 0.60%	336 0.90%	1,041 1.00%
2005-09 ACS	39,253	110,919	33,031 84.20%	100,799 90.90%	3,102 7.90%	4,168 3.80%	1,754 4.50%	3,480 3.10%	577 1.50%	711 0.60%	789 2.00%	1,761 1.60%
2010	41,285	115,788	33,612 81.40%	103,851 89.70%	3,415 8.30%	4,858 4.20%	3,106 7.50%	4,897 4.20%	749 1.80%	1,109 1.00%	403 1.00%	1,073 0.90%

source: www.s4.brown.edu/us2010/segregation2010

What did the Index of Dissimilarity from *US2010* reveal for Cleveland and Bradley County? The data examined included the dissimilarity indices of the Non-Hispanic Black, Hispanic, and Asian populations relative to the White population in the City of Cleveland and the Cleveland MSA. The indices for 2010 reveal a fairly low dissimilarity for all three groups in Cleveland, with values ranging from 10.8 to 24.6, but for the Cleveland MSA the values are in the low moderate range from 30.3 to 30.9. The Cleveland index value is consistently lower by several points than the MSA value, about 14 points for the non-Hispanic Black population, about 20 points for the Hispanic population, and about 9 points for the Asian population. Inside Cleveland since 1990 the index values have fallen about 13 points for the Non-Hispanic Black population and about 8 points for the Hispanic population, while the value rose by about 5 points for the Asian population. The biggest change over the 1990 to 2010 period was among the

Non-Hispanic Black population for whom the index fell by about 13 points in Cleveland and 11 points in the MSA, indicating a relatively greater dispersion of this group among Census tracts. With a value of about 11 in Cleveland, the Hispanic population shows the lowest dissimilarity. A contrary trend of greater dissimilarity is shown by the Asian population in bot Cleveland and the MSA from 1990 to 2010, but this group is still relatively small in number. The 2005-2009 ACS values for the Hispanic and Asian population seem out of line with the decennial census observations.

**Table 2. INDEX OF DISSIMILARITY:
Cleveland TN and Cleveland MSA (Bradley County and Polk County)**

	Black and White		Hispanic and White		Asian and White	
	Cleveland	MSA	Cleveland	MSA	Cleveland	MSA
1980	44.4	NA	22.5	NA	32.2	NA
1990	37.9	49.4	18.8	29.2	19.2	26.8
2000	30.4	41.5	16.3	23.1	21.5	32.2
2005-09 ACS	33.7	41.5	39.5	38.2	57.8	56.6
2010	24.6	38.9	10.8	30.3	24.4	33.8

source: www.s4.brown.edu/us2010/segregation2010. "The dissimilarity index measures whether one particular group is distributed across census tracts in the metropolitan area in the same way as another group" A value of 60 is very high and it means that at least 60% of the group would have to move to a different census tract in order to have even distribution. Values of 40 to 50 represent moderate segregation and values of 30 or below are fairly low.

What does the Index of Isolation from *US2010* show for Cleveland and Bradley County? The large values, ranging from about 82 to 96, are for the Non-Hispanic White population indicating that members of this group tend to be relatively isolated from members of the other groups. However the index values for this group have fallen over the period 1990-2010. Index values for the Non-Hispanic Black population have fallen 2

to 3 points from 1990 to 2010 in both Cleveland and the MSA. This population has grown but has also become somewhat less isolated with perhaps relatively more growth occurring in census tracts where the group has been underrepresented. The index values for the Hispanic population have increased in Cleveland and the MSA over the period 1990 to 2010. This population has experienced the greatest growth among minority groups and may be exhibiting an increased concentration in some census tracts.

**Table 3. INDEX OF ISOLATION:
Cleveland TN and Cleveland MSA (Bradley County and Polk County)**

	White		Black		Hispanic		Asian	
	Cleveland	MSA	Cleveland	MSA	Cleveland	MSA	Cleveland	MSA
1980	92.6	NA	21.3	NA	1.5	NA	0.3	NA
1990	91.3	95.6	13.0	9.7	1.8	1.2	0.6	0.4
2000	88.1	93.2	11.1	8.4	3.4	2.5	1.4	1.0
2005-09 ACS	85.0	91.5	12.1	7.3	8.6	7.7	4.6	2.0
2010	81.6	90.2	10.7	8.1	8.1	6.1	2.5	1.6

source: www.s4.brown.edu/us2010/segregation2010. "The isolation index is the percentage of same-group population in the census tract where the average member of a racial/ethnic group lives". The lowest possible value is zero (a small group highly dispersed) and the highest possible value is 100 (group members are entirely isolated from other groups). Small groups tend to have small values.

What does the Index of Exposure from *US2010* show for Cleveland and Bradley County? For Non-Hispanic Black and White populations inside Cleveland and in the Cleveland MSA, Black-White exposure fell somewhat while White-Black exposure rose to a lesser degree over the period 1990 to 2010. It appears that most of the Non-Hispanic Black population growth is probably occurring in areas where this population is already concentrated but some of this growth is occurring where the White population has formerly had less exposure to this group. The trends are the same for Hispanic-White exposure and White-Hispanic exposure in Cleveland and the MSA but the changes are more pronounced which may be an indication of higher relative growth in this group. Still it would seem likely that most Hispanic population growth is in areas where there are relatively higher concentrations of this group.

**Table 4. INDEX OF EXPOSURE:
Cleveland TN and Cleveland MSA (Bradley County and Polk County)**

	Black-White/White-Black		Hispanic-White/White-Hispanic		Asian-White/White-Asian	
	Cleveland	MSA	Cleveland	MSA	Cleveland	MSA
1980	77.5 / 5.8	NA	92.5 / 1.0	NA	94.3 / 0.2	NA
1990	84.6 / 6.6	88.2 / 3.0	89.4 / 1.4	92.7 / 0.8	90.5 / 0.4	94.4 / 0.3
2000	83.5 / 7.0	86.8 / 3.4	85.7 / 2.8	90.2 / 1.8	88.8 / 1.2	91.3 / 0.6
2005-09 ACS	79.9 / 7.5	84.9 / 3.5	78.7 / 4.2	83.0 / 2.9	83.3 / 1.4	87.2 / 0.6
2010	78.5 / 8.0	83.3 / 3.9	80.2 / 7.4	85.3 / 4.0	82.5 / 1.8	87.5 / 0.9

source: www.s4.brown.edu/us2010/segregation2010. "Indices of exposure to other groups also range from 0 to 100, where a larger value means that the average group member lives in a tract with a higher percentage of persons from the other group."

HMDA Data—DataPlace.org
Cleveland, TN

Indicators

Chart All Loans, total and by purpose

Home impr. loans for 1 to 4 family units per 1000 housing units (2007)	10
Home purchase loans for 1 to 4 fam. units per 1000 housing units (2007)	47
Mortgage loans for home improvement of 1 to 4 family units (2007)	940,911
Mortgage loans for home purchase of 1 to 4 family units (2007)	4,631,859
Mortgage loans for refinancing of 1 to 4 family units (2007)	4,770,735
Multifamily loans for all purposes per 1000 housing units (2007)	2
Pct. purchase loans for 1 to 4 fam. units that are not owner-occ. (2007)	14.1%
Pct. purchase loans not owner-occ., 1 to 4 fam. excl. manif. (2007)	14.2%
Refinancing loans for 1 to 4 family units per 1000 housing units (2007)	49

Chart All Dollar amount of loans, total and by purpose

Dollar amt. of impr. loans for 1 to 4 fam. units per 1000 units (2007)	\$809
Dollar amt. of loans for home improvement of 1 to 4 family units (2007)	\$79,136,264,000
Dollar amt. of purch. loans for 1 to 4 fam. units per 1000 units (2007)	\$9,578
Dollar amt. of refin. loans for 1 to 4 fam. units per 1000 units (2007)	\$9,993
Median loan amount for home improvement of 1 to 4 family units (2007)	\$38,000
Median loan amount for home purchase of 1 to 4 family units (2007)	\$153,000
Median loan amount for home purchase of manufactured homes (2007)	\$63,000
Median loan amount for multifamily dwellings (all purposes) (2007)	\$600,000
Median loan amount for refinancing of 1 to 4 family units (2007)	\$157,000
Median purch. loan amt. for 1 to 4 fam. units, excl. manif. homes (2007)	\$157,000

Chart All Home purchase loans by race

Pct. of owner-occ. home purchase loans to Asian/Pac. Islanders (2007)	5.2%
Pct. of owner-occupied home purchase loans to Blacks (2007)	7.9%
Pct. of owner-occupied home purchase loans to Hispanics (2007)	10.8%
Pct. of owner-occupied home purchase loans to minorities (2007)	27.3%
Pct. of owner-occupied home purchase loans to Native Americans (2007)	0.3%
Pct. of owner-occupied home purchase loans to Whites (2007)	72.7%
Pct. of owner-occupied home purchase mortgage to mixed race pairs (2007)	2.9%
Pct. owner-occ. purch. loans to non-Hisp. multiracial borrowers (2007)	0.2%

Chart All Home purchase loans by structure type

Pct. of home purchase mortgage loans for manufactured homes (2007)	3.0%
Pct. of home purchase mortgage loans for multifamily dwellings (2007)	0.3%
Pct. of purchase loans for 1 to 4 fam. units, excl. manif. homes (2007)	96.7%

Chart All Home purchase loans by income and structure

Med. borrower inc. for own.-occ. purch., 1 to 4 fam. incl. manuf. (2007)	
\$72,000	
Pct. of owner-occ. home purchase loans to low-income borrowers (2007)	19.2%
Pct. of owner-occ. home purchase loans to middle-inc. borrowers (2007)	25.8%
Pct. of owner-occ. home purchase loans to high-income borrowers (2007)	49.3%
Med. borrower inc. for own.-occ. purch., 1 to 4 fam. excl. manuf. (2007)	
\$74,000	
Median borrower income for owner-occ. purchases of manuf. homes (2007)	
\$42,000	
Median income of purch. borrowers (1 to 4 fam.)/median owner inc. (2007)	
1.13	
Pct. of owner-occ. purchase loans to very low-income borrowers (2007)	5.7%

Chart All Loan denials by race-income combinations

Denial rate of conventional purchase loans to high-income Asians (2007)	19.5%
Denial rate of conventional purchase loans to high-income Blacks (2007)	36.7%
Denial rate of conventional purchase loans to high-income Whites (2007)	13.4%
Denial rate of conventional purchase loans to low-income Asians (2007)	17.9%
Denial rate of conventional purchase loans to low-income Blacks (2007)	35.7%
Denial rate of conventional purchase loans to low-income Whites (2007)	19.1%
Denial rate of conv. purchase loans to high-inc. mixed race pairs (2007)	13.2%
Denial rate of conv. purchase loans to high-income Hispanics (2007)	33.4%
Denial rate of conv. purchase loans to high-income minorities (2007)	28.8%
Denial rate of conv. purchase loans to low-income Hispanics (2007)	29.5%
Denial rate of conv. purchase loans to low-income minorities (2007)	30.9%
Denial rate of conv. purchase loans to middle-income Asians (2007)	16.6%
Denial rate of conv. purchase loans to middle-income Blacks (2007)	35.0%
Denial rate of conv. purchase loans to middle-income minorities (2007)	28.9%
Denial rate of conv. purchase loans to middle-income Whites (2007)	15.2%
Denial rate of conv. purch. loans to high-income Native Americans (2007)	27.4%
Denial rate of conv. purch. loans to low-inc. multiracial appl. (2007)	25.4%
Denial rate of conv. purch. loans to low-income mixed race pair (2007)	27.7%
Denial rate of conv. purch. loans to low-income Nat. Americans (2007)	39.9%
Denial rate of conv. purch. loans to middle-inc. mixed race pairs (2007)	18.9%
Denial rate of conv. purch. loans to middle-income Hispanics (2007)	30.3%
Denial rate of conv. purch. loans to middle-income Nat. Americans (2007)	29.3%
Denial rate of conv. purch. loans to very low-income Nat. Amer. (2007)	56.4%
Denial rate of purch. loans to high-income multiracial applicants (2007)	25.4%
Denial rate of purch. loans to middle-inc. multiracial appl. (2007)	22.6%
Denials of conventional purchase loans to high-income Asians (2007)	40,330
Denials of conventional purchase loans to high-income Blacks (2007)	76,769
Denials of conventional purchase loans to high-income Hispanics (2007)	125,891
Denials of conventional purchase loans to high-income minorities (2007)	258,855
Denials of conventional purchase loans to high-income Whites (2007)	265,555

Denials of conventional purchase loans to middle-income Asians (2007)	9,863
Denials of conventional purchase loans to middle-income Blacks (2007)	44,847
Denials of conventional purchase loans to middle-income Hispanics (2007)	47,919
Denials of conventional purchase loans to middle-income Whites (2007)	124,462
Denials of conv. purchase loans to high-income mixed race pairs (2007)	12,553
Denials of conv. purchase loans to low-income Asians (2007)	5,408
Denials of conv. purchase loans to low-income Blacks (2007)	43,000
Denials of conv. purchase loans to low-income Hispanics (2007)	34,190
Denials of conv. purchase loans to low-income minorities (2007)	87,717
Denials of conv. purchase loans to low-income mixed race pairs (2007)	3,181
Denials of conv. purchase loans to low-income Native Americans (2007)	1,354
Denials of conv. purchase loans to middle-inc. multiracial appl. (2007)	621
Denials of conv. purchase loans to middle-income minorities (2007)	109,442
Denials of conv. purchase loans to middle-income mixed race pairs (2007)	5,165
Denials of conv. purchase loans to middle-income Native Americans (2007)	1,027
Denials of conv. purch. loans to high-inc. multiracial applicants (2007)	1,405
Denials of conv. purch. loans to high-income Native Americans (2007)	1,907
Denials of conv. purch. loans to low-inc. multiracial applicants (2007)	584
Chart All Home purchase loans by income	
Med. borrower inc. for own.-occ. purch., 1 to 4 fam. excl. manuf. (2007)	\$74,000
Median borrower income for owner-occ. purchases of manuf. homes (2007)	\$42,000
Pct. of owner-occ. home purchase loans to high-income borrowers (2007)	49.3%
Pct. of owner-occ. home purchase loans to low-income borrowers (2007)	19.2%
Pct. of owner-occ. home purchase loans to middle-inc. borrowers (2007)	25.8%
Pct. of owner-occ. purchase loans to very low-income borrowers (2007)	5.7%
Chart All Loans from subprime lenders, total and by purpose	
Pct. of conv. home purchase mortgage loans by subprime lenders (2005)	17.7%
Pct. of conv. refinancing mortgage loans by subprime lenders (2005)	20.4%
Pct. of govt.-insured home purchase loans by subprime lenders (2005)	0.3%
Pct. of govt.-insured refin. mortgage loans by subprime lenders (2005)	0.5%
Chart All Home purchase loans by gender	
Owner-occ. home purchase loans by male and female co-borrowers (2007)	1,573,482
Owner-occupied home purchase loans by female borrowers (2007)	880,676
Owner-occupied home purchase loans by male borrowers (2007)	1,250,625
Pct. of owner-occ. purchase loans to male and female co-borrowers (2007)	41.5%
Pct. of owner-occupied home purchase loans by female borrowers (2007)	23.2%
Pct. of owner-occupied home purchase loans to male borrowers (2007)	33.0%
Pct. owner-occ. purch. loans by co-borrowers of the same gender (2007)	2.2%
Chart All Loan denials by race	

Denial rate of conv. home purchase loans to Asian applicants (2007)	19.6%
Denial rate of conv. home purchase loans to Black applicants (2007)	37.5%
Denial rate of conv. home purchase loans to Hispanic applicants (2007)	32.6%
Denial rate of conv. home purchase loans to minority applicants (2007)	30.4%
Denial rate of conv. home purchase loans to mixed race pairs (2007)	16.6%
Denial rate of conv. home purchase loans to Native Americans (2007)	34.2%
Denial rate of conv. home purchase loans to White applicants (2007)	16.3%
Denial rate of conv. purch. loans to non-Hisp. multiracial appl. (2007)	26.5%

Chart All Loan denials by gender

Denial rate of conv. home purchase loans to female applicants (2007)	24.8%
Denial rate of conv. home purchase loans to male applicants (2007)	25.1%
Denial rate of conv. purchase loans to male/female co-applicants (2007)	14.4%
Denial rate of conv. purch. loans to co-appl. of the same gender (2007)	22.4%

Chart All High cost loans by loan type

Conventional first-lien loans with high interest rates (2007)	1,531,984
Conventional home purchase loans with high interest rates (2007)	716,292
Conventional refinancing loans with high interest rates (2007)	972,172
Conv. first-lien home impr. loans with high int. per 1000 1-4 fam. units (2007)	1.1
Conv. first-lien home impr. loans with high int. per 1000 units (2007)	0.9
Conv. first-lien home purchase loans with high interest rates (2007)	582,485
Conv. first-lien owner purchase loans with high interest rates (2007)	467,366
Conv. first-lien owner refinancing loans with high interest rates (2007)	765,064
Conv. first-lien purchase loans with high interest per 1000 1-4 fam. units (2007)	6.0
Conv. first-lien purchase loans with high interest per 1000 units (2007)	5.0
Conv. first-lien refinancing loans with high interest rates (2007)	845,203
Conv. first-lien refin. loans with high interest per 1000 1-4 fam. units (2007)	8.6
Conv. first-lien refin. loans with high interest per 1000 units (2007)	7.3
Government-insured home purchase loans with high interest rates (2007)	14,705
Pct. of conv. first-lien owner purch. loans with high interest (2007)	15.5%
Pct. of conv. first-lien owner refin. loans with high interest (2007)	22.2%
Pct. of conv. first-lien purchase loans with high interest rates (2007)	16.1%
Pct. of conv. first-lien refin. loans with high interest rates (2007)	21.6%
Pct. of conv. home purchase loans with high interest rates (2007)	17.0%
Pct. of conv. purchase loans with high int. that are first liens (2007)	81.3%
Pct. of conv. refinancing loans with high interest rates (2007)	21.2%
Pct. of conv. refin. loans with high int. that are first liens (2007)	86.9%
Pct. of govt. first-lien purchase loans with high interest rates (2007)	3.5%
Pct. of govt.-insured home purch. loans with high interest rates (2007)	3.5%
Pct. of govt.-insured refinancing loans with high interest rates (2007)	6.8%