City of Cleveland, TN

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

CLEVELAND
TENNESSEE
EST. 1842

2024

Table of Contents

I. Executive Summary

Glossary of Terms

Throughout this document you will find specialized terms used to describe some of the research and findings. This glossary of terms has been prepared to familiarize the reader with some of the words and the way they are being defined and used in this Analysis of Impediments to Fair Housing Choice.

❖ ❖ ❖ ❖ ❖

Accessibility: whether a physical structure, object, or technology is able to be used by people with disabilities such as mobility issues, hearing impairment, or vision impairment. Accessibility features include wheelchair ramps, audible crosswalk signals, and TTY numbers.

Affirmatively Further Fair Housing (AFFH): a requirement under the Fair Housing Act that local governments take steps to further fair housing, especially in places that have been historically segregated.

American Community Survey (ACS): a survey conducted by the US Census Bureau that regularly gathers information about demographics, education, income, language proficiency, disability, employment, and housing. Unlike the Census, ACS surveys are conducted both yearly and across multiple years. The surveys study samples of the population, rather than counting every person in the U.S. like the Census.

Americans With Disabilities Act (ADA): federal civil rights law that prohibits discrimination against people with disabilities.

Annual Action Plan: an annual plan used by local jurisdictions that receive money from HUD to plan how they will spend the funds to address fair housing and community development. The Annual Action Plan carries out the larger Consolidated Plan.

CDBG: Community Development Block Grant. Money that local governments receive from HUD to spend on housing and community improvement.

Census Tract: small subdivisions of cities, towns, and rural areas that the Census uses to group residents together and accurately evaluate the demographics of a community. Several census tracts, put together, make up a town, city, or rural area.

Consolidated Plan (Con Plan): a plan that helps local governments evaluate their affordable housing and community development needs and market conditions. Local governments must use their Consolidated Plan to identify how they will spend money from HUD to address fair housing and community development. Any local government that receives money from HUD in the form of CDBG, HOME, ESG, or HOPWA grants must have a Consolidated Plan. Consolidated Plans are carried out through annual Action Plans. See: Action Plan, CDBG, HOME, ESG, HOPWA.

Continuum of Care (CoC): a HUD program designed to promote commitment to the goal of ending homelessness. The program provides funding to nonprofits and state and local governments to quickly rehouse homeless individuals and families, promote access to and effect utilization of mainstream programs by homeless individuals, and optimize self-sufficiency among individuals and families experiencing homelessness.

Data and Mapping Tool (AFFHT): an online HUD resource combining data from various sources including HUD, the decennial Census data and the American Community Survey to generate maps and tables evaluating the demographics of an area for a variety of categories, including race, national origin, disability, Limited English Proficiency, housing problems, environmental health, and school proficiency, etc.

Disparate Impact: practices in housing that negatively affect one group of people with a protected characteristic (such as race, sex, or disability, etc.) more than other people without that characteristic, even though the rules applied by landlords do not single out that group.

Dissimilarity Index: measures the percentage of a certain group's population that would have to move to a different census tract in order to be evenly distributed with a city or metropolitan area in relation to another group. The higher the Dissimilarity Index, the higher the level of segregation. For example, if a city's Black/White Dissimilarity Index was 65, then 65 percent of Black residents would need to move to another neighborhood in order for Blacks and Whites to be evenly distributed across all neighborhoods in the city.

Entitlement Jurisdiction: a local government that receives funds from HUD to be spent on housing and community development.

ESG: Emergency Solutions Grant. Funding provided by HUD to 1) engage homeless individuals and families living on the street, 2) improve the number and quality of emergency shelters for homeless individuals and families, 3) help operate these shelters, 4) provide essential services to shelter residents, 5) rapidly re-house homeless individuals and families, and 6) prevent families/individuals from becoming homeless.

Environmental Health Index: a HUD calculation based on potential exposure to harmful toxins at a neighborhood level. This includes air quality carcinogenic, respiratory, and neurological hazards. The higher the number, the less exposure to toxins harmful to human health.

Environmental Justice: the fair treatment and meaningful involvement of all people, especially minorities, in the development, implementation, and enforcement of environmental laws, regulations, and policies. In the past, environmental hazards have been concentrated near segregated neighborhoods, making minorities more likely to experience negative health effects. Recognizing this history and working to make changes in future environmental planning are important pieces of environmental justice.

Exclusionary Zoning: the use of zoning ordinances to prevent certain land uses, especially the building of large and affordable apartment buildings for low-income people. A city with exclusionary zoning might only allow single-family homes to be built in the city, excluding people who cannot afford to buy a house.

Exposure Index: a measurement of how much the typical person of a specific race is exposed to people of other races. A higher number means that the average person of that race lives in a census tract with a higher percentage of people from another group.

Fair Housing Act: a federal civil rights law that prohibits housing discrimination on the basis of race, class, sex, religion, national origin, or familial status. See also: Housing Discrimination.

Gentrification: the process of renovating or improving a house or neighborhood to make it more attractive to middle-class residents. Gentrification often causes the cost of living in the neighborhood to rise, pushing out lower-income residents and attracting middle-class residents. Often, these effects which are driven by housing costs have a corresponding change in the racial demographics of an area.

HOME: HOME Investment Partnership. HOME provides grants to States and localities that communities use (often in partnership with nonprofits) to fund activities such as building, buying, and/or rehabilitating affordable housing for rent or ownership, or providing direct rental assistance to low-income people.

HOPWA: Housing Opportunities for Persons With AIDS. HUD makes grants under the HOPWA program to local communities, states, and nonprofits for projects that benefit low-income people living with HIV/AIDS and their families

Housing Choice Voucher (HCV): a HUD rental subsidy issued to a low-income household that promises to pay a certain amount of the household's rent. Prices, or payment standards, are set based on the rent in the metropolitan area, and voucher households must pay any difference between the rent and the voucher amount. Participants of the HCV program are free to choose any rental housing that meets program requirements

Housing Discrimination: the refusal to rent to or inform a potential tenant about the availability of housing. Housing discrimination also applies to buying a home or getting a loan to buy a home. The Fair Housing Act makes it illegal to discriminate against a potential tenant/buyer/lendee based on that person's race, class, sex, religion, national origin, or familial status.

Isolation Index: a measurement of how much the typical person of a specific race is only exposed to people of the same race. For example, an 80 percent isolation index value for White people would mean that the population of people the typical White person is exposed to is 80 percent White.

Inclusionary Zoning: a zoning ordinance that requires that a certain percentage of any newly built housing must be affordable to people with low and moderate incomes.

Jobs Availability Index: number of jobs per 1000 people within a five mile radius of the census tract center-point. Index is computed by the UC Davis Center for Regional Change.

Jobs Proximity Index: a HUD calculation based on distances to all job locations, distance from any single job location, size of employment at that location, and labor supply to that location. The higher the number, the better the access to employment opportunities for residents in a neighborhood.

Labor Market Engagement Index: a HUD calculation based on level of employment, labor force participation, and educational attainment in a census tract. The higher the number, the higher the labor force participation and human capital in the neighborhood.

Limited English Proficiency (LEP): residents who do not speak English as a first language, and who speak English less than "very well."

Local Data: any data used in this analysis that is not provided by HUD through the Data and Mapping Tool (AFFHT), or through the Census or American Community Survey.

Low Income Housing Tax Credit (LIHTC): provides tax incentives to encourage individual and corporate investors to invest in the development, acquisition, and rehabilitation of affordable rental housing.

Low Poverty Index: a HUD calculation using both family poverty rates and public assistance receipt in the form of cash-welfare (such as Temporary Assistance for Needy Families (TANF)). This is calculated at the Census Tract level. The higher the score, the less exposure to poverty in the neighborhood.

Low Transportation Cost Index: a HUD calculation that estimates transportation costs for a family of 3, with a single parent, with an income at 50 percent of the median income for renters for the region. The higher the number, the lower the cost of transportation in the neighborhood.

Market Rate Housing: housing that is not restricted by affordable housing laws. A market rate unit can be rented for any price that the market can support.

NIMBY: Not In My Back Yard. A social and political movement that opposes housing or commercial development in local communities NIMBY complaints often involve affordable housing, with reasons ranging from traffic concerns to small town quality to, in some cases, thinly-veiled racism.

Poverty Line: the minimum level of yearly income needed to allow a household to afford the necessities of life such as housing, clothing, and food. The poverty line is defined on a national basis. The 2024 US poverty line for a family of three is $25,820.

Project-Based Section 8, Project-Based Rental Assistance, PBRA: a government-funded program that provides rental housing to low-income households in privately owned and managed rental units. The funding is specific to the building. If you move out of the building, you will no longer receive the funding.

Public Housing: housing that is owned and managed by a Public Housing Authority for eligible low-income households.

Publicly Supported Housing: housing assisted with funding through federal, State, or local agencies or programs, as well as housing that is financed or administered by or through any such agencies or programs.

Other Multi-Family Housing: multifamily housing that is owned and operated by private owners, and is subsidized through programs other than HCV, PBRA, or LIHTC. Units include properties funded through Supportive Housing for the Elderly (Section 202), and Supportive Housing for Persons with Disabilities (Section 811).

Reasonable Accommodation: a change to rules, policies, practices, or services which would allow a handicapped person an equal opportunity to use and enjoy their housing, including in public and common use areas. It is a violation of the Fair Housing Act to refuse to make a reasonable accommodation when such accommodation is necessary for the handicapped person to have equal use and enjoyment of the housing.

R/ECAPs: Racially and Ethnically Concentrated Areas of Poverty. This is a HUD-defined term indicating a census tract that has more than 50 percent Non-White residents, and 40 percent or more of the population is in poverty OR where the poverty rate is greater than three times the average poverty rate in the area. In the HUD Data and Mapping Tool (AFFHT), R/ECAPS are outlined in pink.

Rehabilitation Act (Section 504): a federal civil rights law that prohibits discrimination on the basis of disability in programs conducted by federal agencies, in programs receiving federal financial assistance, in federal employment and in the employment practices of federal contractors.

School Proficiency Index: a HUD calculation based on performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. The higher the number, the higher the school system quality is in a neighborhood.

Segregation: the separation or isolation of a race/ethnic group, national origin group, individuals with disabilities, or other social group by enforced or voluntary residence in a restricted area, by barriers to social connection or dealings between persons or groups, by separate educational facilities, or by other discriminatory means.

A. Background

Title VIII of the 1968 Civil Rights Act, also known as the federal Fair Housing Act, made it illegal to discriminate in the buying, selling or renting of housing because of a person's race, color, religion or national origin. Sex was added as a protected class in the 1970s. In 1988, the Fair Housing Amendments Act added familial status and disability to the list, making a total of seven federally protected classes. Federal fair housing statutes are largely covered by the following three pieces of U.S. legislation:

- The Fair Housing Act,

- The Housing Amendments Act, and

- The Americans with Disabilities Act.

State or local governments may enact fair housing laws that extend protection to other groups as well. For example, the Texas Fair Housing Act, protects individual's right to rent an apartment, buy a home, obtain a mortgage, or purchase homeowners insurance free from discrimination based on: race, color, national origin, religion, sex, familial status, and disability.

This Analysis of Impediments to Fair Housing Choice (AI) documents a variety of fair housing issues faced by the residents of the City of Cleveland, assesses their underlying causes, and identifies goals and actions to address those issues. It aims to harness data, community input, and policy analysis to craft solutions that will have a real impact for citizens.

The City of Cleveland, as an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) is required to submit certification of affirmatively furthering fair housing. This certification has three elements and requires that the City:

1. Complete an Analysis of Impediments to Fair Housing Choice (AI);
2. Take actions to overcome the effects of any impediments identified; and
3. Maintain records reflecting the actions taken in response to the analysis.

HUD describes impediments to fair housing choice in terms of their applicability to local, state and federal law. The federal Fair Housing Act defines impediments as:

Any actions, omissions or decisions taken because of race, color, religion, sex, national origin, familial status, and mental or physical disability which restrict housing choices or the availability of housing choice.

The AI is a part of a multi-stage planning process: it provides a focused, comprehensive look into fair housing issues and generates fair housing goals to inform later planning processes, such as the Consolidated Plan (designating use of block grant funds), as well as other relevant activities. The AI process involves a thorough examination of a variety of sources related to housing, affirmatively furthering fair housing, the fair housing delivery system and housing transactions, particularly for persons who are protected under fair housing law. AI sources include census data, employment and income information, federal and state fair housing complaint information, surveys of housing industry experts and stakeholders, and related information found in the public domain.

While housing issues are complex and multi-faceted, and affect all residents of the region, the purpose of this AI is to focus specifically on fair housing and related needs and actions. The AI therefore examines whether housing issues are experienced differently on the basis of characteristics protected by the Fair Housing Act, which was crafted to address segregation and to prohibit discrimination on the basis of race, ethnicity, national origin, religion, sex, familial status, and disability. It also includes characteristics protected under state and local law, including any protections for sexual orientation and gender identity.

An AI also includes an involved public input and review process via direct contact with stakeholders, public forums to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and possible actions to overcome the identified impediments.

The AI follows the Assessment of Fair Housing process and template, as developed by HUD in its 2015 regulation and Assessment Tool. As described below, its scope includes in-depth looks at a number of areas relevant to fair housing, including: trends and description of demographics; patterns of segregation and integration; identification of racially/ethically concentrated areas of poverty ("R/ECAPs"); disproportionate housing needs (including cost burden and the adequacy and safety of housing); disparities in access to opportunity (education, employment, low poverty exposure, and environmental health); disabilities and access; publicly-supported housing; and fair housing enforcement, outreach, and capacity. In addition to data, maps, and policy analysis, it examines barriers to fair housing and their underlying causes ("contributing factors"). Most importantly, its data and analyses (including community input) provide the foundation for meaningful fair housing goals that address specific local issues.

B. Why Assess Fair Housing?

Provisions to affirmatively further fair housing are long-standing components of HUD's housing and community development programs. These provisions flow from Section 808(e) (5) of the Federal Fair Housing Act, which requires that the Secretary of HUD administer HUD's housing and urban development programs in a manner that affirmatively furthers fair housing.

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single preparation: the Consolidated Plan for Housing and Community Development. This document incorporates the plans for original consolidated programs, including Community Development Block Grants (CDBG). As a part of the consolidated planning process (24 CFR 91), states and entitlement communities receiving such funds as a formula allocation directly from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing. This certification has three parts and requires:

Conducting an Analysis of Impediments to Fair Housing Choice (AI);

- Taking appropriate actions to overcome the effects of any impediments identified through the analysis; and

- Maintaining records reflecting the analysis and actions taken.

HUD interprets these three certifying elements to entail:

- Analyzing and working to eliminate housing discrimination in the jurisdiction;

- Promoting fair housing choice for all people;

- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy;

- Promoting housing that is physically accessible to, and usable by, all people, particularly individuals with disabilities; and

- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

On July 16, 2015, the Affirmatively Furthering Fair Housing (AFFH) Final Rule was published providing program participants with an approach to more effectively and efficiently incorporate into the planning process the duty of affirmatively furthering the policies of the Fair Housing Act. The purpose of this rule was to refine the prior analysis of impediments approach by replacing it with a fair housing assessment tool that would better inform HUD program participants' planning process and assist them in fulfilling the statutory obligation. Per the AFFH Rule, no Assessment of Fair Housing (AFH) will be due before the publication of the Assessment Tool applicable to the program participant. In addition, HUD must provide a minimum of nine (9) months after publication of the Assessment Tool when setting the deadline for submission of the AFH.

On Friday, January 5, 2018, HUD published Federal Notice Document 2018-00106, titled: *Affirmatively Furthering Fair Housing: Extension of Deadline for Submission of Assessment of Fair Housing for Consolidated Plan Participants.*This notice advises that HUD is extending the deadline for submission of an Assessment of Fair Housing (AFH) by local government consolidated plan program participants to their next AFH submission date that falls after October 31, 2020.

On February 9, 2023, HUD published in the Federal Register a Notice of Proposed Rulemaking entitled "Affirmatively Furthering Fair Housing". The proposed rule, which builds on and refines HUD's 2015 rule, would faithfully implement the Fair Housing Act's statutory mandate that HUD ensure that recipients of its funding affirmatively further fair housing (AFFH). The AFFH mandate requires the agency and its program participants to proactively take meaningful actions to overcome patterns of segregation, promote fair housing choice, eliminate disparities in opportunities, and foster inclusive communities free from discrimination. Per the guidance, the City of Cleveland will continue to meet the obligation of affirmatively furthering fair housing by **conducting an Analysis of Impediments to Fair Housing Choice.**

C.   Research Methodology/Community Participation Process

The 2024 City of Cleveland Analysis of Impediments to Fair Housing Choice offers a thorough examination of a variety of sources related to housing, such as demographic change, economic influences, and the state of the housing market, but also information pertaining to affirmatively furthering fair housing, the state of the fair housing delivery system and housing transactions affecting people throughout the City. This information was collected and evaluated through four general approaches:

> 1. *Primary Research* – the collection and analysis of raw data that did not previously exist.
>
> 2. *Secondary Research* – the review of existing data and studies.
>
> 3. *Quantitative Analysis* – the evaluation of objective, measurable and numerical data.
>
> 4. *Qualitative Analysis* – the evaluation and assessment of subjective data, such as people's beliefs, feelings, attitudes, opinions and experiences.

Some of the baseline secondary and quantitative data providing a picture of the city's housing marketplace were drawn from the 2020 census and intercensal estimates. These data included population, personal income, poverty estimates, housing units by tenure, cost burdens, and housing conditions. Other data were drawn from records provided by the Bureau of Economic Analysis, the Bureau of Labor Statistics and a variety of other sources. The narrative below offers a brief description of other key data sources employed for the AI.

Community Engagement

- **Stakeholder Surveys in conjunction with this Analysis**- a survey was designed to collect information from community stakeholders. These surveys were distributed in hard-copy format and were also hosted online through SurveyMonkey.com to provide an alternative means of response.

  The Fair Housing Survey was designed to collect input from a broad spectrum of the community and received responses from City of Cleveland residents and non-residents. The survey consisted of 28 distinct questions, allowing a mixture of both multiple choice and open-ended responses. In all, there were 61 responses to this survey, though not every question was answered by every respondent. As a result, where a percentage of survey respondents are cited in this Analysis, it refers only to the percentage of respondents to the question being discussed and may not be a percentage of the total survey respondents.

  Surveys were received over from January 10, 2024 to February 15, 2024. Paper surveys received were manually entered by the Survey Administrator into Survey Monkey for tabulation and analysis. To prevent "ballot stuffing", the Survey Monkey software bars the submission of multiple surveys from a single IP address. The link to the online survey was distributed through various email distribution lists.

- **Stakeholder Interviews** – Key groups of community stakeholders were identified, contacted, and interviewed as part of this Analysis.   These stakeholders included representatives of nonprofit organizations (especially nonprofit housing developers), municipal officials, City of Cleveland staff, fair housing advocates, members of City Council, and homeless service providers. Other stakeholders not belonging to any of these groups were occasionally interviewed as dictated by the course of research carried out for this Analysis.

- **Public Meeting** – A public meeting was held to provide a forum for City of Cleveland residents and other interested parties to contribute to this Analysis held on Thursday, February 1, 2024 at 2:00pm and 5:00pm at the City of Cleveland, Municipal Building, City Council Room, 190 Church Street, NE Cleveland, TN 37364 for residents to attend. This meeting was advertised via flyers distributed by the City using its various mailing distribution lists. Local libraries and nonprofits receiving the posters were asked to print and post or distribute them as appropriate. The format of these meetings ranged from small-group roundtable discussions to moderated forums. Notes were taken of the public comments at all meetings.

D. Current 2024 Impediments and Recommendations

Impediment 1: Discrimination in the rental market based on source of income.

Renters who receive a verifiable source of legal income, such as social security, child support, SSI and Section 8 vouchers can still face legal discrimination in the City.

Recommendation:

- Testing to determine the severity of the issue.
- Support the adoption of source of income as a citywide protected basis.
- Support legislation to prevent landlords from categorically denying housing to tenants whose sources of income include a housing subsidy or other sources of legitimate income, as other cities have done. Keeping in mind that landlords could still reject tenants who do not have adequate income and resources to meet the monthly rental payments, and could still deny tenancy on legal standards that are equally applied to all applicants.

Impediment 2: The expense of tenant screening reports for low-income renters.

According to recent research, the average renter will have to pay for three or more tenant screening reports when they are trying to find new housing. These screening fees can be a barrier to moving into stable housing, especially for families on limited incomes, already faced with the costs of a deposit and first month's rent.

Recommendation:

- Adopt statutory changes to consolidate tenant screening reports. Establish a process by which tenants will be able to buy just one report that can be provided to all prospective landlords requesting the data, to make the tenant screening process more affordable and fairer for both tenants and landlords.

Impediment 3: Housing Affordability/Cost Burden

High rents in relationship to the earnings of average workers put housing affordability out of the reach for many. Housing is the largest monthly cost for most households. Owners and renters with a severe cost burden are at risk of homelessness. Cost-burdened households that experience a financial setback often must choose between rent and food or rent and health care for their families or face eviction or foreclosure.

Recommendations:

- Leverage Tenant Based Rental Assistance as an interim solution for housing affordability.
- Explore re-purposing of existing real estate to include strip malls and extended stay hotels into rental units, including SRO options.
- Provide tax incentives for apartment owners or owners of secondary residential properties who are willing to set aside a certain number of their existing apartments / homes as affordable housing.

- Encourage more private sector investment in existing affordable housing properties to supplement federally funded efforts.
- Develop Economic Development activities that will provide opportunities for small businesses to grow their customer base in their pursuit of sustainability.

Impediment 4: Deficiency of Fair Housing Education

As the City continues to expand with an increasingly diverse population, fair housing education must be continuous and presented in a context that is relative to the current community concerns.

Recommendations:

- Fund and promote Fair Housing Education and Housing Counseling activities with CDBG Public Service funds.
- Develop a Fair Housing Education Campaign to increase public awareness of fair housing rights.
- Seek public and private partners to disseminate fair housing information to residents.

Impediment 5: Mortgage Lending Practices

As the City continues to expand with an increasingly diverse population, addressing the needs of the City's most vulnerable residents is a priority. HMDA data revealed that most denials were with non-white borrowers and minority households.

Recommendations:

- Testing to determine the severity of the issue.
- Creating more employment opportunities and helping unemployed householders by providing adequate training and skill development will improve their financial stability.
- A comprehensive plan that looks into population projections and demographic trends can help the city plan better and devise strategies that attract economic development and increase financial prosperity.
- The city can work proactively with financial institutions and banks to allow for more flexibility in payments and assist with background checks by reducing liability or providing assistance.

II.   COMMUNITY CHARACTERISTICS

Demographic information in this section primarily relies on data published by the United States Census Bureau. Specifically, the 2020 Decennial Census and American Community Survey (ACS) 2018-2022 5-Year Estimates are used throughout. Supplemental information is also provided through the United States Department of Housing and Urban Development (HUD) Office of Policy Development and Research (PD&R).

The demographic summary provides a current snapshot of the City's residents, housing, employment, education, and land use. This section also includes recent trends regarding these topics. Demographic data and other background information helped form the foundation for this Analysis of Impediments (AI) and AI's of the future.

A. Historical Profile

Cleveland, city, seat (1836) of Bradley County, southeastern Tennessee, U.S., about 30 miles northeast of Chattanooga. Established in 1836 following the agreement for the evacuation of the area by the Cherokee, the community was named for Colonel Benjamin Cleveland, a hero of the American Revolution. For thousands of years before European encounter, this area was occupied by succeeding cultures of indigenous peoples. The first Europeans to reach the area now occupied by Cleveland and Bradley County were most likely a 1540 expedition through the interior led by Spanish explorer Hernando de Soto. By the 1830s, white settlers had begun to move rapidly into this area in anticipation of a forced relocation of the Cherokee and other Southeast tribes. In 1830 Congress passed the Indian Removal Act, striking a significant blow to the relations between the United States and the Cherokee nation. In 1835 the Cherokee suffered yet another blow with the signing of the Treaty of New Echota. The Treaty of New Echota took the land that is now Cleveland out of the hands of the Cherokee and placed it in the hands of the United States.

Cleveland is the seventeenth-largest city in Tennessee and has the fifth-largest industrial economy, having thirteen Fortune 500 manufacturers. The early Cleveland economy relied heavily on leather tannery and lumber. The city's economy is based on agriculture (livestock) and industry. Manufactures include gas and electric ranges, paper, furniture, textiles, clothing, chemicals, batteries, and snack foods. Cleveland is the headquarters for Cherokee National

Forest, which stretches along the length of Tennessee's eastern border and is divided into two sections by Great Smoky Mountains National Park. Red Clay State Historical Park, the site of the last Cherokee councils before their removal along the Trail of Tears, is south of the city; events celebrating Cherokee culture are held throughout the year. The Ocoee River, in the national forest in neighboring Polk County, is one of the top whitewater rafting rivers in the United States and the site of canoe and kayak events during the 1996 Summer Olympic Games. Hiwassee State Scenic River also provides recreational opportunities. The Church of God operates Lee University (1918) and has its international headquarters in the city. Cleveland State Community College opened in 1967.

B. Demographic Profile

The primary source of demographic data used in this study comes from the U.S. Census Bureau. The American Community Surveys (ACS) provides the most recent demographic data as well as important information use to show the trends in population and household changes over the years. Demographic data was analyzed and obtained from the 2020 U.S. Census 2022 American Community Survey (ACS).

Population

According to ACS estimates, Cleveland, Tennessee has experienced an 8.65% increase in population with the population increasing from 43,924 in 2018 to 47,725 in 2022.

Age and Sex Over the Years

According to the 2022 American Community Survey 5-Year Estimates, the median age of Cleveland, TN Residents is 34.5 years old. The largest concentration of residents is in the 25-44 age range making up 25.12% of this population.

Overall, the largest demographic is 25-44 years old at 11,624. In terms of sex, females have historically outnumbered males within the last five years. Women edged out men 52.88% to 47.12% as of the 2022 census; a slight change from 2018 numbers that reflected 52.14 % to 47.59% for women to men. The senior citizen population of 65 and over has experienced a 21.71% increase. With this observation, the city will need to take into consideration the growing number of the elderly when developing community housing plans.

AGE & SEX POPULATION CHARACTERISTICS						
	2018			**2022**		
Age	**Both Sexes**	**Male**	**Female**	**Both Sexes**	**Male**	**Female**
	43,924	**20,905**	**23,019**	**47,725**	**22,486**	**25,239**
Under 18 years	9,561	4,812	4,749	10,522	5,126	5,396
18 to 24 years	6,347	3,005	3,342	7,041	3,434	3,607
25 to 44 years	11,624	5,903	5,721	11,989	6,060	5,929
45 to 64 years	9,707	4,652	5,055	10,037	4,657	5,380
65 years and over	6,685	2,533	4,152	8,136	3,209	4,927
Median Age [years]	**34.9**	**32.3**	**37.1**	**34.5**	**33**	**36.9**

Table 1: Age & Sex Population Characteristics Source: U.S. Census Bureau 2018 & 2022 5-yr ACS Estimates, www.census.gov

Households

According to the 2022 ACS 5 Year Estimates Survey, there are currently 38,659 households in Cleveland, Tennessee. Currently the household size for an overall household size is 2.51 and the family size is 3.15 this number differs slightly from the 2018 data set that shows the average family size at 3.14. The data also shows most households are owner-occupied married-couple family households. The majority of renter-occupied households are female lead, no spouse present family.

MARITAL STATUS			
2018		**2022**	
Population 15 years and over	**35,829**	**Population 15 years and over**	**38,659**
Never married	33.50%	Never married	35.40%
Now married, except separated	43.70%	Now married, except separated	41.70%
Divorced or separated	15.90%	Divorced or separated	14.50%
Widowed	7.00%	Widowed	8.40%
Average household size	**2.51**	**Average household size**	**2.51**
Average family size	**3.14**	**Average family size**	**3.15**

Table 1: Household Type Source: U.S. Census Bureau 2018 & 2022 5-yr ACS Estimates, www.census.gov

HOUSEHOLD AND FAMILIES					
	Total	Married-couple family household	Male householder, no wife present, family household	Female householder, no husband present, family household	Nonfamily household
Total Households	**17,801**	**7,277**	**1,168**	**2,547**	**6,809**
Average Household Size	2.51	3.23	3.21	3.45	1.26
FAMILIES					
Total Families	**10,992**	**7,277**	**1,168**	**2,547**	**(X)**
Average Family Size	3.15	3.18	2.83	3.24	(X)
HOUSING TENURE					
Owner-Occupied Housing	50.30%	67.60%	33.00%	27.80%	43.30%
Renter-Occupied Housing	49.70%	32.40%	67.00%	72.20%	56.70%

Table 2: Household and Families Source: U.S. Census Bureau 2022 5-yr ACS Estimates, www.census.gov

Race and Ethnicity

Cleveland, TN's racial makeup consisted of 81.95% White; 9.05% Black or African American; 0.31% American Indian and/or Alaskan Native; 1.98% Asian; 0.20% Pacific Islander; 0.44% from some other races; and 6.06% from two or more races; 88.16% were Not Hispanic or Latino of any race.

RACE AND ETHNICITY		
	Number	**Percentage**
TOTAL POPULATION	**47,356**	**100%**
White	34,214	81.95%
Black or African American	3,779	9.05%
American Indian and Alaska Native	130	0.31%
Asian	825	1.98%
Native Hawaiian and Other Pacific Islander	85	0.20%
Some other race	185	0.44%
Two or more races	2,530	6.06%
HISPANIC OR LATINO		
Hispanic or Latino	5,608	11.84%
Not Hispanic or Latino	41,748	88.16%

Table 3: Race and Ethnicity Source: U.S. Census Bureau 2020 Decennial, www.census.gov

Origin and Ancestry

According to U.S. Census Bureau, 2022 5-yr American Community Survey Estimates, there were approximately 3,472 Foreign born individuals in Cleveland, Tennessee. Most of the foreign-born population originated from Latin American at 38.05%, while another notable portion comes from Asia at 33.99%.

	Foreign-born; Entered 2010 or later	Foreign-born; Entered 2000 to 2009	Foreign-born; Entered before 2000	Total
Naturalized citizen	9.70%	45.71%	72.91%	**43.95%**
Not a citizen	90.30%	54.29%	27.09%	**56.05%**
Total Foreign-Born Population	1,134	1,061	1,277	**3,472**

Table 4: Foreign-Born Source: U.S. Census Bureau 2022 5-yr ACS Estimates, www.census.gov

WORLD REGION OF BIRTH OF FOREIGN BORN	
Foreign-born population excluding population born at sea	**3,472**
Europe	12.85%
Asia	33.99%
Africa	12.38%
Oceania	0.00%
Latin America	38.05%
Northern America	2.74%

Table 5: World Region of Birth Source: U.S. Census Bureau 2022 5-yr ACS Estimates, www.census.gov

The following table presents the ancestry of Cleveland, TN residents in 2022. The most common ancestries identified were English (12.30%), Irish (10.60%), and American (7.30%).

ANCESTRY		
Total population	**47,725**	**100%**
American	3,489	7.30%
Arab	101	0.20%
Czech	102	0.20%
Danish	179	0.40%
Dutch	417	0.90%

English	5,877	12.30%
French (except Basque)	540	1.10%
French Canadian	173	0.40%
German	4,737	9.90%
Greek	96	0.20%
Hungarian	97	0.20%
Irish	5,051	10.60%
Italian	530	1.10%
Lithuanian	35	0.10%
Norwegian	139	0.30%
Polish	476	1.00%
Portuguese	90	0.20%
Russian	429	0.90%
Scotch-Irish	805	1.70%
Scottish	1,427	3.00%
Slovak	39	0.10%
Sub-Saharan African	616	1.30%
Swedish	459	1.00%
Swiss	52	0.10%
Ukrainian	201	0.40%
Welsh	438	0.90%
West Indian (excluding Hispanic origin groups)	172	0.40%

Table 6: Ancestry Source: U.S. Census Bureau 2022 5-yr ACS Estimates, www.census.gov

Limited English Proficiency

Section 601 of Title VI the Civil Rights Act of 1964 is the federal law that protects individuals from discrimination based on their race, color, or national origin in programs or activities that receive federal financial assistance. One type of national origin discrimination is discrimination based on a person's inability to speak, read, write, or understand English. In certain situations, failure to ensure that persons who are LEP can effectively participate in, or benefit from, federally assisted programs may violate the Civil Rights Act.

The LEP population of Cleveland, TN is consistent with the national origin data. Spanish is, by far, the most spoken language among LEP individuals in Cleveland, Tennessee. Although English is

predominantly spoken, roughly 11% of the population speak other languages, which suggests a need for accommodations of those non-English speaking residents. The second most common language in the city is Spanish.

LANGUAGE SPOKEN AT HOME		
Population 5 years and over	**44,459**	**100%**
English only	39,395	88.60%
Spanish	3,365	7.60%
Other Indo-European languages	773	1.70%
Asian and Pacific Islander languages	526	1.20%
Other languages	400	0.90%

Table 8: Language Spoken at Home Source: U.S. Census Bureau 2022 5-yr ACS Estimates, www.census.gov

C. Income Profile

The income and poverty profile presents an overview of household income, data elements that include household size, low-income population, and percentage of median family households in poverty. As noted in the table below, the median household income for Cleveland, TN increased from $42,400 in 2018 to $52,468 in 2022, while the mean family income also increased from $68,104 in 2018 to $75,777 in 2022.

HOUSEHOLD INCOME				
	2018		2022	
	Total Number of Households	Percentage	Total Number of Households	Percentage
Total Households	**16,317**	**100%**	**17,801**	**100%**
Less than $10,000	1,517	9.30%	1,193	6.70%
$10,000 to $14,999	946	5.80%	1,282	7.20%
$15,000 to $24,999	2,072	12.70%	1,655	9.30%
$25,000 to $34,999	1,942	11.90%	1,905	10.70%
$35,000 to $49,999	2,888	17.70%	2,457	13.80%
$50,000 to $74,999	2,774	17.00%	2,919	16.40%
$75,000 to $99,999	1,599	9.80%	1,727	9.70%
$100,000 to $149,999	1,469	9.00%	3,026	17.00%
$150,000 to $199,999	457	2.80%	819	4.60%
$200,000 or more	653	4.00%	819	4.60%
Median Household Income	**$42,400.00**		**$52,468.00**	

Mean Family Income	$68,104.00	$75,777.00

Table 9: Household Income Source: U.S. Census Bureau 2018 & 2022 5-yr ACS Estimates, www.census.gov

The Department of Housing and Urban Development (HUD) sets income limits that determine eligibility for assisted housing programs including the Public Housing. Since FY 2011, HUD has based its median family income estimates on data from the Census Bureau's American Community Survey (ACS). Since FY 2012, there has been a 3-year lag between the ACS estimates and the fiscal year for which the income limits are in effect. For example, the FY 2022 median family incomes and income limits were based on the ACS 2019 data. The FY 2023 median family incomes and income limits would ordinarily be based on the ACS 2020 estimates. However, because of the lack of 1-year ACS 2020 estimates described above, HUD intends to instead base the FY 2023 median family incomes and income limits on ACS 2021 data.

The CDBG Program provides annual grants on a formula basis to Entitlement Communities to support viable communities by providing decent housing, a suitable living environment, and opportunities to expand economic opportunities, principally for low-and moderate-income persons. For a project or program to qualify for CDBG funds, 51% of the program beneficiaries must be low- to moderate-income as defined by HUD.

The following table reflects the current HUD income limits for one to eight-person households who earn at or below 80% of the Area Median Income (AMI) for Cleveland, TN.

2023 CDBG MAXIMUM INCOME LIMITS			
Household Size	Extremely Low-Income Limits	Very Low (50%) Income Limits	Low (80%) Income Limits
1	$14,580.00	$24,200.00	$38,750.00
2	$19,720.00	$27,650.00	$44,250.00
3	$24,860.00	$31,100.00	$49,800.00
4	$30,000.00	$34,550.00	$55,300.00
5	$35,140.00	$37,350.00	$59,750.00
6	$40,100.00	$40,100.00	$64,150.00
7	$42,850.00	$42,850.00	$68,600.00
8	$45,650.00	$45,650.00	$73,000.00

Table 10: FY 23 Income Limits Summary:
https://www.huduser.gov/portal/datasets/il/il2023/2023summary.odn?inputname=METRO17420M17420*Cleveland%2C+TN+MSA&wherefrom=%24wherefrom%24&selection_type=hmfa&year=2023

Percentage of Poverty in Cleveland, TN

According to U.S. Census and ACS data, Female head of household, no husband present, families with related children under the age of 18 whose income was below poverty level was 35.60% in

POVERTY CHARACTERISTICS						
	All Families		Married-couple families		Female householder, no spouse present	
	Total	% Below Poverty Level	Total	% Below Poverty Level	Total	% Below Poverty Level
Families	**10,992**	**12.90%**	**7,277**	**4.90%**	**2,547**	**35.60%**
With related children of householder under 18 years	5,149	20.80%	2,771	6.10%	1,660	46.60%
With related children of householder under 5 years	1,067	16.90%	634	1.90%	278	60.40%
With related children of householder under 5 years and 5 to 17 years	1,323	38.00%	684	22.50%	513	62.00%
With related children of householder 5 to 17 years	2,759	14.00%	1,453	0.30%	869	33.10%

2022.The most common poverty characteristics in Cleveland, TN, is families with related children under 18 years of age.

Table 11: Family Poverty Source: U.S. Census Bureau 2022 5-yr ACS Estimates, www.census.gov

D. Employment Profile

Data regarding the labor force, defined as the total number of persons working or looking for work and employment is gathered from the 2018 and 2022 American Community Survey five year estimates are presented below. The labor force participation increased from 60.10 percent in 2018 to 61.40 percent in 2022. The employed population increased by 2.2 percent during that time. The unemployment rate decreased from 5.9 percent in 2018 to 4.30 percent in 2022.

EMPLOYMENT				
	2018		2022	
Population 16 years and over	**35,227**	**100%**	**38,061**	**100%**
In labor force	21,169	60.10%	23,370	61.40%
Not in labor force	14,058	39.90%	14,691	38.60%
Population 16 years and over	**35,227**	**100%**	**38,061**	**100%**
Civilian labor force	**21,146**	**60.00%**	**23,358**	**65.50%**
Employed	19,902	56.50%	22,358	58.70%
Unemployed	1,244	3.50%	1,000	2.60%
Armed Forces	**23**	**0.10%**	**12**	**0.00%**
Not in labor force	**14,058**	**39.90%**	**14,691**	**38.60%**

Unemployment Rate	(X)	5.90%	(X)	4.30%

Table 12: Employment Source: U.S. Census Bureau 2018 &2022 5-yr ACS Estimates, www.census.gov

Jobs Held by Residents

In 2022, 63.60% of Cleveland, TN's residents 16 years of age and over were part of the labor force; according to the 2022 5-yr American Community Survey Estimates. The largest portion of Cleveland, TN workers are in management, business, science, and arts occupation with service, sales, and office occupations coming in second. Service and sales/office occupations combined account for about forty percent of the workforce.

The following charts illustrate the categories of workers and their occupations.

OCCUPATIONAL CHARACTERISTICS		
Occupations of Cleveland, TN Residents	Estimated Number of Residents	% Employed by Occupation
Civilian employed population 16 years and over	22,358	100%
Management, business, science, and arts occupations	8,348	37.30%
Service occupations	4,218	18.90%
Sales and office occupations	4,837	21.60%
Natural resources, construction, and maintenance occupations	1,019	4.60%
Production, transportation, and material moving occupations	3,936	17.60%

Table 14: Occupational Characteristics: Source: U.S. Census Bureau 2022 5-yr ACS Estimates, www.census.gov

WORK CLASS CHARACTERISTICS		
Worker Class in Cleveland, TN	Estimated Number of Residents	% Employed by Worker Class
Civilian employed population 16 years and over	22,358	100%
Private wage and salary workers	18,089	80.90%
Government workers	2,863	12.80%
Self-employed workers in own not incorporated business	1,318	5.90%
Unpaid family workers	88	0.40%

Table 15: Work Class Characteristics: Source: U.S. Census Bureau 2022 5-yr ACS Estimates, www.census.gov

Means of Transportation to Work

According to the 2022 5-Yr American Community Survey, an estimated 20,314 workers commute to work daily. Means of transportation to work refers to the mode of travel used to get from home to work most frequently.83.45% commuted by car, truck, or van, 13.16% carpooled, 0.00 utilized public transportation, and 3.39% did not identify their means of transportation. The travel time to work is approximately 21 minutes.

MEANS OF TRANSPORTATION TO WORK				
	Total	Car, truck, or van -- drove alone	Car, truck, or van -- carpooled	Public transportation (excluding taxicab)
Workers 16 years and over in households	20,314	16,952	2,673	0
TIME OF DEPARTURE TO GO TO WORK				
12:00 a.m. to 4:59 a.m.	4.10%	4.40%	2.30%	0.00%
5:00 a.m. to 5:29 a.m.	3.80%	4.40%	0.20%	0.00%
5:30 a.m. to 5:59 a.m.	4.80%	4.80%	5.60%	0.00%
6:00 a.m. to 6:29 a.m.	5.70%	4.30%	15.80%	0.00%
6:30 a.m. to 6:59 a.m.	8.70%	8.40%	11.70%	0.00%
7:00 a.m. to 7:29 a.m.	14.30%	14.60%	13.90%	0.00%
7:30 a.m. to 7:59 a.m.	12.10%	13.30%	6.40%	0.00%
8:00 a.m. to 8:29 a.m.	9.50%	9.80%	7.90%	0.00%
8:30 a.m. to 8:59 a.m.	5.10%	4.70%	3.70%	0.00%
9:00 a.m. to 11:59 p.m.	32.00%	31.20%	32.40%	0.00%
TRAVEL TIME TO WORK				
Less than 10 minutes	24.10%	23.80%	23.90%	0.00%
10 to 14 minutes	20.40%	20.70%	15.90%	0.00%
15 to 19 minutes	19.50%	19.90%	20.40%	0.00%
20 to 24 minutes	7.10%	7.30%	7.10%	0.00%
25 to 29 minutes	4.20%	4.30%	4.80%	0.00%
30 to 34 minutes	9.00%	10.00%	2.50%	0.00%
35 to 44 minutes	6.10%	5.60%	10.40%	0.00%
45 to 59 minutes	4.10%	3.60%	7.60%	0.00%
60 or more minutes	5.50%	4.90%	7.60%	0.00%
Mean travel time to work (minutes)	21.2	20.4	27.1	0

Table 16: Means of Transportation: Source: U.S. Census Bureau 2022 5-yr ACS Estimates, www.census.gov

Major Employers

Whirlpool Corporation, Bradley County Schools, Peyton's Southeastern, and Tennova comprise the largest employment markets for the City of Cleveland, TN accounting for 40.30% of the full-time local employment.

COMPANY	Full-Time Local Employment
Whirlpool Corporation, Cleveland Division	1,600
Bradley County Schools (includes cafeteria)	1,160
Peyton's Southeastern	1,157
Tennova	1,100
Jackson Furniture	894
Amazon	790
WACKER Polysilicon	772
Cleveland City Schools	745
Walmart (two stores)	640
Bradley County Government (includes law enforcement and corrections)	620
Mars Chocolate North America	575
Lee University	501
Family Resource Agency	483
Life Care Centers of America	450
Life Bridges, Inc.	447
Eaton Electrical	413
City of Cleveland (not including seasonal part-time)	340
Renfro Corporation	336

Table 17: Major Employers: Source: https://clevelandbradleyedc.com/largest-employers/

E. Housing Profile

Housing stock impacts the ability to access adequate housing. This includes the number, type, size and affordability of units. This is particularly important to low- and moderate-income persons, and persons in protected classes, including disabled persons, families with children, and the elderly.

Housing Units

According to the U.S. Census, the number of housing units in Cleveland has increased by 4.7% from 16,989 in 2020 to 17,801 in 2022 with 91.9% of the units were occupied while 8.1% or 1,580 of the units were vacant. The City's vacancy rate decreased from 6.2% in 2020 to 4.7% in 2022. Furthermore, the share of renter occupied units decreased from 52.7% in 2020 to 49.6% in 2022.

Housing Unit Data		
	2020	2022
Total housing units	16,989	17,801
Occupied housing units	8,035	8,958
Vacant housing units	8,954	8,843
Homeowner vacancy rate	1.3	1.7
Rental vacancy rate	4.9	3.0

Table 18: Housing Unit Data, US Census, 2022 American Community Survey 5-Year Estimates

Housing Stock

As shown in the following table, Cleveland reported a total of 17,801 occupied housing units in 2022. Of the total occupied housing units, 8,958 housing units were owner occupied. Similarly, 8,843 units were renter occupied. The vast majority of owner-occupied housing units within the City are single-family detached units (approximately 58.9%) closely followed by units with 10 or more apartments (approximately 10.1%).

Physical Housing Characteristics for Occupied Housing Units		
Occupied housing units	*17,801*	*100.0%*
Owner-occupied	8,958	52.7%
Renter-occupied	8,843	49.3%
Units in Structure		
Total housing units	*17,801*	*100%*
1, detached	10,478	58.9%
1, attached	995	5.6%
2 apartments	1,164	6.5%
3 or 4 apartments	1,522	8.6%
5 to 9 apartments	1,165	6.5%
10 or more apartments	1,796	10.1%
Mobile home or other type of housing	681	3.8%

Table 17: Housing Unit Data, US Census, 2022 American Community Survey 5-Year Estimates

Age of Structure

The age of a dwelling unit is a factor used to evaluate the structural quality of the unit. The average industry standard for the life span of a single-family dwelling is generally 50 years. However, this typical life span often depends on the quality of the original construction and continued maintenance of the unit. Using this standard, some homes found within the City constructed prior to 1970 may be approaching the end of their utility.

The table below identifies the age of year-round residential structures. The majority of the units in the City were built from 1970 to 1999 (69.5%). When considering the average life span of a dwelling unit, the homes built before 1970 will have already reached their 50-year life span. Thus, over 30% of the City's housing units have reached their life span. These homes require regular maintenance to remain structurally sound.

Housing Stock Age		
Total housing units	*17,801*	*100%*
Built 2020 or later	31	0.2%
Built 2010 to 2019	2,456	13.8%
Built 2000 to 2009	2,020	11.3%
Built 1990 to 1999	4,325	24.3%
Built 1980 to 1989	5,660	31.8%
Built 1970 to 1979	2,390	13.4%
Built 1960 to 1969	919	5.2%
Built 1950 to 1959	31	0.2%
Built 1940 to 1949	446	3.40%
Built 1939 or earlier	599	4.50%

Table 20: Housing Unit Data, US Census, 2022 American Community Survey 5-Year Estimates

Overcrowding

Overcrowding is defined as more than one person per room and severe overcrowding as more than 1.5 persons per room according to HUD. As shown below approximately 1.6% of occupied housing units 2022 in the City experience overcrowding and 0.7% experience severe overcrowding.

Comprehensive Housing Affordability Strategy (CHAS)

HUD's Comprehensive Housing Affordability Strategy (CHAS) is a commonly-used gauge of housing affordability, or lack thereof. HUD considers a housing unit affordable if the occupant household expends no more than 30% of its income on housing cost. In the situation where the household expends greater than 30% of its income on housing cost, the household is considered cost burdened. In cases where housing cost is 50% of income or greater, the household is

considered severely cost burdened. Cost burdened households have less financial resources to meet other basic needs (food, clothing, transportation, medical, etc.), less resources to properly maintain the housing structure, and are at greater risk for foreclosure or eviction.

Income Categories
- Extremely Low Income: 0%-30% of the Area Median Income (AMI)
- Low Income: 31%-50% of the AMI
- Moderate Income: 51%-80% of the AMI
- Middle and Upper Income: 80% or More of the AMI

Housing Problem categories are defined below:

"Substandard Housing – lacking complete plumbing or kitchen facilities" is defined as a household without hot and cold piped water, a flush toilet and a bathtub or shower, and kitchen facilities that lack a sink with piped water, a range or stove, or a refrigerator. The second housing problem identified is households living in overcrowded conditions.

There are two forms of overcrowding defined by HUD:

• Severely overcrowded is defined as a household having complete kitchens and bathrooms but housing more than 1.51 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms.

• Overcrowded is defined as a household having complete kitchens and bathrooms but housing more than 1.01 to 1.5 persons per room excluding bathrooms, porches, foyers, halls, or half-rooms.

The final housing problem identified is cost burden. Cost burden is a fraction of a household's total gross income spent on housing costs. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payment, taxes, insurance, and utilities. Cost burden is broken into two categories based on severity:

• Severe housing cost burden greater than 50% of income
• Housing cost burden greater than 30% of income

Overcrowding				
Occupants Per Room	**2020**	**%**	**2022**	**%**
1.00 or less occupants per room	16,552	97.4	17,398	97.7
1.01 to 1.50 occupants per room	295	1.7	281	1.6

1.51 or more occupants per room	142	0.8	122	.7
Total	**16,989**		**17,801**	

Table 21: Housing Unit Data, US Census, 2022 American Community Survey 5-Year Estimates

Although the 2022 ACS data provides an estimate of the number of households that are cost-burdened, CHAS data provides the number and percentages of households by income level within the City that had housing problems as well as the size and type of household. The below analysis is based on this data. The latest available CHAS data is generated from the 2016-2020 ACS data, while dated, provides detailed information about housing cost burdens for all categories.

CHAS data indicates that more rental households experience at least one housing problem in comparison to homeowners. In addition, a greater percentage of rental households are cost-burdened than homeowners.

Data for: Bradley County; Tennessee Year Selected: 2016-2020 ACS			
Income Distribution Overview	**Owner**	**Renter**	**Total**
Household Income <= 30% HAMFI	1,825	3,175	5,000
Household Income >30% to <=50% HAMFI	2,145	2,125	4,270
Household Income >50% to <=80% HAMFI	3,975	3,155	7,130
Household Income >80% to <=100% HAMFI	3,230	1,340	4,570
Household Income >100% HAMFI	16,040	3,725	19,765
Total	**27,210**	**13,520**	**40,730**
Housing Problems Overview 1	**Owner**	**Renter**	**Total**
Household has at least 1 of 4 Housing Problems	4,565	5,585	10,150
Household has none of 4 Housing Problems OR cost burden not available no other problems	22,645	7,930	30,575
Total	**27,210**	**13,520**	**40,730**
Severe Housing Problems Overview 2	**Owner**	**Renter**	**Total**
Household has at least 1 of 4 Severe Housing Problems	2,505	2,840	5,345
Household has none of 4 Severe Housing Problems OR cost burden not available no other problems	24,705	10,680	35,385
Total	**27,210**	**13,520**	**40,730**
Housing Cost Burden Overview 3	**Owner**	**Renter**	**Total**
Cost Burden <=30%	22,815	8,080	30,895
Cost Burden >30% to <=50%	2,135	2,885	5,020
Cost Burden >50%	2,145	2,154	4,299

Cost Burden not available	115	395	510
Total	**27,210**	**13,520**	**40,730**

Income by Housing Problems (Owners and Renters)	Household has at least 1 of 4 Housing Problems	Household has none of 4 Housing Problems OR cost burden not available no other problems	Total
Household Income <= 30% HAMFI	3,430	1,560	5,000
Household Income >30% to <=50% HAMFI	2,870	1,400	4,270
Household Income >50% to <=80% HAMFI	2,345	4,780	7,130
Household Income >80% to <=100% HAMFI	690	3,880	4,570
Household Income >100% HAMFI	810	18,955	19,765
Total	**10,150**	**30,575**	**40,730**

Income by Housing Problems (Renters only)	Household has at least 1 of 4 Housing Problems	Household has none of 4 Housing Problems OR cost burden not available no other problems	Total
Household Income <= 30% HAMFI	2,260	910	3,175
Household Income >30% to <=50% HAMFI	1,715	410	2,125
Household Income >50% to <=80% HAMFI	1,135	2,015	3,155
Household Income >80% to <=100% HAMFI	110	1,230	1,340
Household Income >100% HAMFI	360	3,365	3,725
Total	**5,585**	**7,930**	**13,520**

Income by Housing Problems (Owners only)	Household has at least 1 of 4 Housing Problems	Household has none of 4 Housing Problems OR cost burden not available no other problems	Total
Household Income <= 30% HAMFI	1,170	650	1,825
Household Income >30% to <=50% HAMFI	1,155	990	2,145
Household Income >50% to <=80% HAMFI	1,210	2,765	3,975
Household Income >80% to <=100% HAMFI	580	2,650	3,230
Household Income >100% HAMFI	450	15,590	16,040
Total	**4,565**	**22,645**	**27,210**

Income by Cost Burden (Owners and Renters)	Cost burden > 30%	Cost burden > 50%	Total
Household Income <= 30% HAMFI	3,355	2,610	5,000
Household Income >30% to <=50% HAMFI	2,760	1,055	4,270
Household Income >50% to <=80% HAMFI	2,085	325	7,130
Household Income >80% to <=100% HAMFI	600	270	4,570
Household Income >100% HAMFI	530	45	19,765
Total	**9,330**	**4,299**	**40,730**

Income by Cost Burden (Renters only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income <= 30% HAMFI	2,190	1,695	3,175
Household Income >30% to <=50% HAMFI	1,700	445	2,125
Household Income >50% to <=80% HAMFI	939	4	3,155
Household Income >80% to <=100% HAMFI	80	0	1,340
Household Income >100% HAMFI	130	10	3,725
Total	**5,039**	**2,154**	**13,520**

Income by Cost Burden (Owners only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income <= 30% HAMFI	1,160	910	1,825
Household Income >30% to <=50% HAMFI	1,055	610	2,145
Household Income >50% to <=80% HAMFI	1,145	320	3,975
Household Income >80% to <=100% HAMFI	520	270	3,230
Household Income >100% HAMFI	400	35	16,040
Total	**4,280**	**2,145**	**27,210**

Table 8: HUD CHAS Data, https://www.huduser.gov/portal/datasets/cp.html#year2006-2020

Overall, both renters and owners in elderly households and small-related households experience a similar degree of housing problems as well as cost-burden and severe cost-burden. Low income elderly households, low income small related rental households, and moderate income small related owner households were most impacted by cost burden. Extremely low-income households across all categories experienced greater incidences of severe cost burden. Large related households is the group most disproportionately affected by housing problems. Although large related renter households is the group most impacted with cost burden, the level of cost burden and severe cost burden for large related households is proportionate to owners and renters in the other household types examined. This indicates that affordability is not the greatest obstacle for large households in the City.

Housing Costs

Housing costs fluctuate with market forces and are difficult to define. Several sources have been consulted that provide a picture of the overall housing market. Cleveland, TN is

a buyer's market in January 2024, which means that the supply of homes is greater than the demand for homes.

Homeownership

According to realtor.com, a real estate search and analytics site, there are 786 homes for sale, ranging from $12.5K to $5.2M. Cleveland have affordable condo/townhomes, affordable multi-families, and affordable 2-bedroom listings. The median listed sales price for a housing unit in 2024 was $344,000 with a median sales price of $296,300.

Home Values, Cleveland, TN

Annual Income Needed to Afford	Tennessee	Cleveland MSA
ZERO-BEDROOM	$34,770	$26,440
ONE-BEDROOM	$36,627	$28,280
TWO-BEDROOM	$43,186	$37,240
THREE-BEDROOM	$55,892	$48,840
FOUR-BEDROOM	$65,885	$52,760

Figure 1: https://www.realtor.com/realestateandhomes-search/Cleveland_TN/overview

Final FY 2024 & Final FY 2023 FMRs By Unit Bedrooms					
Year	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
FY 2024 FMR	$789	$848	$1,114	$1,462	$1,529
FY 2023 FMR	$661	$707	$931	$1,221	$1,319

Rental Housing

HUD establishes fair market rents (FMR) through area median income and provides FMR data by unit size. This is HUD's way of estimating what a household seeking a rental unit could expect to pay in rent and utilities in the current market. The table below provides the FY 2024 FMR for the City.

FY 2024 Cleveland, TN MSA FMRs for All Bedroom Sizes

Figure 2: HUD User: https://www.huduser.gov/portal/datasets/fmr/fmrs/FY2024_code/2024summary.odn

Housing Affordability

In 2024, the median renter household income is $940. Using the industry standard of three (3) times income to afford a median priced home, a household would need to earn $48,840.00 annually to affordably own a three-bedroom home in Cleveland.

According to the 2022 American Community Survey, median contract rent in Cleveland was $964 monthly. A total of 11.3% of renters households earning less than $20,000 are paying more than 30 percent of their income in housing costs, which indicates a significant cost burden for lower income households.

GROSS RENT		
Occupied units paying rent	17,801	100%
Less than $300	993	5.6%
$300 to $499	1,763	9.9%
$500 to $799	3,629	20.4%
$800 to 999	2,810	15.8%
$1,000 to $1,499	4,764	26.8%
$1,500 to $1,999	2,156	12.1%
$2,000 to $2,499	587	3.3%
$2,500 to $2,999	431	2.4%
$3,000 or more	294	1.7%
No Cash Rent	374	2.1%
Median (dollars)	964	

Table 9: Housing Unit Data, US Census, 2022 American Community Survey 5-Year Estimates

Renter Monthly Housing Costs as a Percentage of Household Income

$344.9K
Median listing home price

$195
Median listing home price/Sq ft

$296.3K
Median sold home price

Less than $20,000	2,907	16.3%
Less than 20 percent	105	0.6%
20 to 29 percent	528	3.0%

30 percent or more	2,274	12.8%
$20,000 to $34,999	2,879	16.2%
Less than 20 percent	378	2.1%
20 to 29 percent	491	2.8%
30 percent or more	2,010	11.3%
$35,000 to $49,999	2,329	13.1%
Less than 20 percent	573	3.2%
20 to 29 percent	996	5.6%
30 percent or more	760	4.3%
$50,000 to $74,999	2,823	15.9%
Less than 20 percent	1,394	7.8%
20 to 29 percent	961	5.4%
30 percent or more	468	2.6%
$75,000 or more	6,352	35.7%
Less than 20 percent	4,943	27.8%
20 to 29 percent	1,312	7.4%
30 percent or more	97	0.5%

Table 10: Housing Unit Data, US Census, 2022 American Community Survey 5-Year Estimates

ACS data for 2022 indicates that Cleveland has 5,348 owners with mortgages and approximately 35.4 percent of homeowners are paying $1,000 to $1,499 for their mortgage closely followed by 25.5 percent of households paying $1,500 to $1,999. A total of 128 or 1.4 percent of households earning $50,000 to $74,999 pay more than 30 percent of their income in housing costs.

Housing Units with a Mortgage

Total Housing units with a mortgage		5,348
Less than $200	0	0.0%
$200 to $399	0	0.0%
$400 to $599	51	1.0%
$600 to $799	211	3.9%
$800 to $999	630	11.8%
$1,000 to $1,499	1,894	35.4%
$1,500 to $1,999	1,365	25.5%
$2,000 to $2,499	557	10.4%
$2,500 to $2,999	431	8.1%
$3,000 or more	209	3.9%
Median (dollars)	1,463	-

Table 25: Housing Unit Data, US Census, 2022 American Community Survey 5-Year Estimates

Housing Units without a Mortgage

Total Housing units without a mortgage		4,089
Less than $200	48	1.3%
$200 to $399	1,249	34.6%
$400 to $599	1,286	35.6%
$600 to $799	902	25.0%
$800 to $999	47	1.3%
$1,000 to $1,499	32	0.9%
$1,500 to $1,999	46	1.3%
$2,000 to $2,499	479	479
$2,500 to $2,999	48	1.3%
$3,000 or more	1,249	34.6%
Median (dollars)	1,286	35.6%

Table 11: Housing Unit Data, US Census, 2022 American Community Survey 5-Year Estimates

Owner Monthly Housing Costs as a Percentage of Household Income

	Estimate	%
Less than $20,000	967	10.8%
Less than 20 percent	65	0.7%
20 to 29 percent	291	3.2%
30 percent or more	611	6.8%
$20,000 to $34,999	849	9.5%
Less than 20 percent	341	3.8%
20 to 29 percent	131	1.5%
30 percent or more	377	4.2%
$35,000 to $49,999	934	10.4%
Less than 20 percent	479	5.3%
20 to 29 percent	194	2.2%
30 percent or more	261	2.9%
$50,000 to $74,999	1,352	15.1%
Less than 20 percent	853	9.5%
20 to 29 percent	371	4.1%
30 percent or more	128	1.4%
$75,000 or more	4,842	54.1%
Less than 20 percent	3,581	40.0%

20 to 29 percent	1,164	13.0%
30 percent or more	97	1.1%

Table 12: Housing Unit Data, US Census, 2022 American Community Survey 5-Year Estimate

Subsidized Multi-family Affordable Housing Stock

One of the ways to address fair housing choice is to provide a wide range of housing choices for residents. For communities that have a higher need for rental housing stock, multi-family housing developments for a variety of income groups and ages such as the elderly. Accessible housing needs can also be addressed by providing housing for persons with disabilities. However, in addressing these needs, there are concerns about racial and ethnic concentrations of housing. The following are some of the multi-family housing types that meet the needs of low income, elderly and persons with disabilities in the City.

F. **Public Housing Authority (PHA) Administrative Plan Review**

The Cleveland Housing Authority has been serving Cleveland and Bradley County since 1959 through the provision of affordable housing rental assistance programs to income eligible citizens. CHA currently operates a Project Based Rental Assistance (PBRA) program of 293 units, and a Public Housing (PIH) program of 114 units. All CHA properties are disbursed over fourteen (14) scattered sites in southeast Cleveland. Additionally, CHA also operates a Housing Choice Voucher (HCV) program serving up to 208 families and a Veterans Affairs Supportive Housing (VASH) program serving up to 15 veteran families.

Other subsided housing options within the City, include low income housing tax credit multifamily developments. According to HUD's Low Income Housing Tax Credit [LIHTC] database, the City has 936 low income units located throughout the City. The City also has less than 26% of public housing voucher concentration in the southern part of the City. The following is a listing of LIHTC properties and voucher concentrations.

City of Cleveland Low Income Tax Credit Housing

HUD ID Number:	Project Name:	Project Address:	Project City:	Project State:	Project ZIP Code:	Total Number of Units:	Total Low-Income Units:	Compliance Monitoring Status
TNA19880370	2ND ST APTS	460 SECOND ST NW	CLEVELAND	TN	37311	3	3	No Longer Monitored
TNA19880505	CLEVELAND SUMMIT APTS	44 INMAN ST	CLEVELAND	TN	37311	79	77	No Longer Monitored
TNA19880510	CORN APTS	441 CHURCH ST NE	CLEVELAND	TN	37311	12	13	No Longer Monitored
TNA19880849	10TH ST TOWNHOUSE	1002 TENTH ST SE	CLEVELAND	TN	37311	2	2	No Longer Monitored
TNA19890812	SAMPLE DUPLEX	933 POPLAR ST NE	CLEVELAND	TN	37311	2	2	No Longer Monitored
TNA19900030	8TH ST TRIPLEX	755 EIGHTH ST NE	CLEVELAND	TN	37311	3	3	No Longer Monitored
TNA19900035	8TH ST DUPLEX	775 EIGHTH ST NE	CLEVELAND	TN	37311	2	2	No Longer Monitored
TNA19900802	MOUSE CREEK APTS	5787 MOUSE CREEK RD NW	CLEVELAND	TN	37312	6	6	No Longer Monitored
TNA19910030	WILDWOOD DUPLEX - CLEVELAND	430 WILDWOOD AVE SE	CLEVELAND	TN	37311	2	2	No Longer Monitored
TNA19910070	CENTRAL AVENUE DUPLEX	473 CENTRAL AVE NW	CLEVELAND	TN	37311	2	2	No Longer Monitored
TNA19920804	8TH STREET NORTH	760 EIGHTH ST NE	CLEVELAND	TN	37311	2	2	No Longer Monitored
TNA19920807	BERRY ST SFD (CLEVELAND)	770 BERRY ST NE	CLEVELAND	TN	37311	1	1	No Longer Monitored
TNA19970015	FOREST GROVE	2350 BLACKBURN RD SE	CLEVELAND	TN	37311	96	96	Not Indicated
TNA19980015	CHEROKEE HILLS APTS (CLEVELAND)	2020 BATES PIKE SE	CLEVELAND	TN	37311	96	96	No Longer Monitored
TNA19980055	PARKTOWNE APTS	2005 WESTLAND DR SW	CLEVELAND	TN	37311	84	84	Not Indicated
TNA19990020	BRADLEY PLACE APTS	435 KILE LN SW	CLEVELAND	TN	37311	80	80	Not Indicated
TNA20080075	SPRING LAKE APTS	1525 SPRING PL RD SE	CLEVELAND	TN	37311	64	64	Not Indicated
TNA20130942	NORTH CLEVELAND TOWERS	1200 MAGNOLIA AVE NE	CLEVELAND	TN	37311	110	0	Not Indicated
TNA20160002	CHEROKEE HILLS APARTMENTS	2020 BATES PIKE SE	CLEVELAND	TN	37311	96	96	Not Indicated
TNA20160018	THE PRESERVE AT HARDWICK	4921 N. LEE HIGHWAY	CLEVELAND	TN	11111	80	80	Not Indicated
TNA20171011	WATERS EDGE APARTMENTS	2360 BLACKBURN ROAD	CLEVELAND	TN	37311	97	97	Not Indicated
TNA20201004	CLEVELAND COURT	1191 CEDAR LANE (SMITH DR AT LEE HIGHWAY)	CLEVELAND	TN	37311	78	78	Not Indicated
TNA20210009	OCOEE VILLAGE APARTMENTS	1350 2ND STREET NE	CLEVELAND	TN	37311	50	50	Not Indicated
TOTAL						**1047**	**936**	

Table 28: Source: HUD Low-Income Housing Tax Credit Database. https://lihtc.huduser.gov/

Location of Subsidized Housing

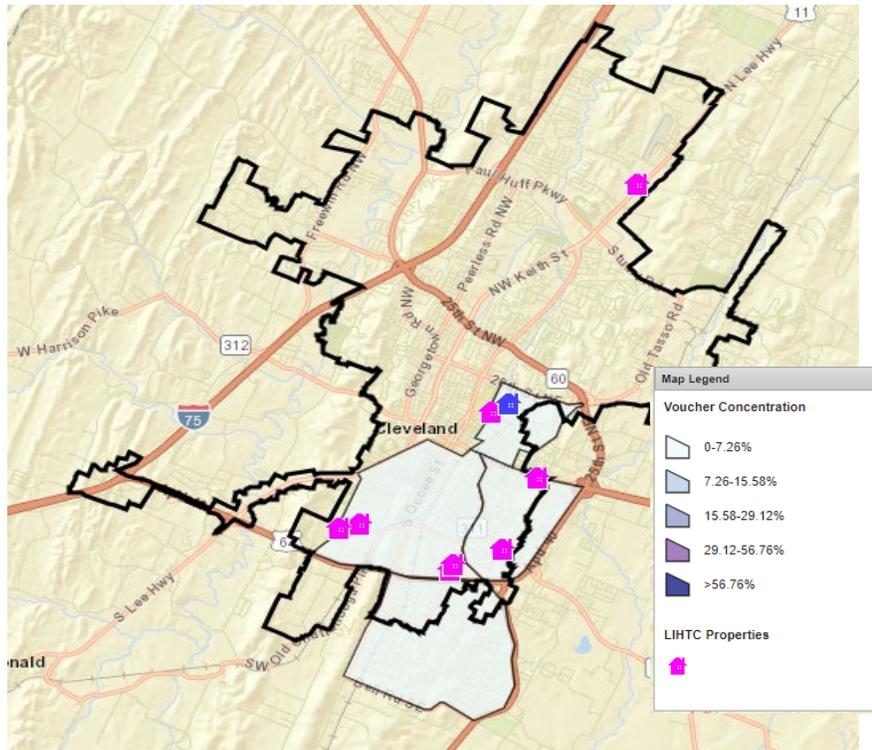Figure 4:   Source: HUD CPD

Maps, https://egis.hud.gov/cpdmaps/

Housing Stock Available to Persons with Disabilities

To determine if there is sufficient housing available for disabled persons you need to first determine the number of persons in the City that meet the definition of disabled. HUD defines a disabled person as " any person who has a physical or mental impairment that substantially limits one or more major life events (walking, talking, hearing, seeing, breathing, learning, performing manual tasks, and caring for one self); has a record of such impairment; or is regarded as having such an impairment.

The most recent data comprehensive data on disability status among Cleveland's population was the U.S. Census 2022 American Community Survey. According to the 2022 ACS, 18.4 percent (8,617 persons) of civilian non-institutionalized population reported a disability. The data included the following breakdown of the disabled population by age group. The highest percentage of disabilities occurs in the 65 and over population group (36.3%) and to 64 category has the next largest number of disabled persons.

Disability Status of the Civilian Non-Institutionalized Population

	Total	With a disability	Percent with a disability
Total civilian noninstitutionalized population	46,770	8,617	18.4%
Under 5 years	3,266	42	1.3%
5 to 17 years	7,255	698	9.6%
18 to 34 years	13,424	1,357	10.1%
35 to 64 years	15,085	3,013	20.0%
65 to 74 years	4,733	1,716	36.3%

Table 13: Source: US Census, www.data.census.gov

The 2022 American Community Survey also provides information regarding type of disabilities within the Cleveland population, as well as the incidence of two or more disabilities within age groups. Persons with ambulatory disabilities are the most common in the city, representing 10.6% of all disabilities in Cleveland. The least common disability reported among Cleveland residents was vision difficulty.

Disability Type

	With a Disability	Percent with a Disability
With a hearing difficulty	2,185	4.7%
With a vision difficulty	1,934	4.1%
With a cognitive difficulty	3,589	8.2%
With an ambulatory difficulty	4,601	10.6%
With a self-care difficulty	1,814	4.2%
With an independent living difficulty	2,764	7.6%

Table 30: Source: US Census, www.data.census.gov

Housing Stock Available to Elderly Persons

According to the 2022 U.S. Census, there are 5,061 elderly persons (over 65 years of age) living in Cleveland comprising 28.4% of the population. Of the 5,061 elderly persons, 2,225 persons (12.5%) are age of 75 and over and are considered to be extra elderly or frail elderly. The population over 55 years of age makes up a smaller percentage of the overall population however, this segment of the population has been growing significantly faster than the younger age groups.

Demographic Characteristics for Occupied Housing Units

Selected Age Categories	Estimate	%
Owner-Occupied Housing Units		
Under 35 years	821	9.2%
35 to 44 years	1,370	15.3%
45 to 54 years	1,514	16.9%
55 to 64 years	1,547	17.3%
65 to 74 years	2,136	23.8%
75 to 84 years	847	9.5%
85 years and over	723	8.1%
Renter-occupied housing units		
Under 35 years	3,421	38.7%
35 to 44 years	1,332	15.1%
45 to 54 years	1,491	16.9%
55 to 64 years	1,244	14.1%
65 to 74 years	700	7.9%
75 to 84 years	427	4.8%
85 years and over	228	2.6%

Table 31: Source: US Census, www.data.census.gov

G. Home Mortgage Disclosure Act (HMDA) Data and Analysis

To examine possible fair housing issues in the home mortgage market, Home Mortgage Disclosure Act (HMDA) data were analyzed. The HMDA was enacted by Congress in 1975 and has since been amended several times. It is intended to provide the public with loan data that can be used to determine whether financial institutions are serving the housing credit needs of their communities and to assist in identifying possible discriminatory lending patterns. HMDA requires lenders to publicly disclose the race, ethnicity, and sex of mortgage applicants, along with loan application amounts, household income, the Census tract in which the home is located, and information concerning prospective lender actions related to the loan application. For this analysis, HMDA data from 2022 was analyzed, with the measurement of denial rates by Census tract and by race and ethnicity of applicants the key research objectives. These data were also examined to identify the groups and geographic areas most likely to encounter higher denial rates and receive loans with unusually high interest rates.

Since the 1970s, the federal government has enacted several laws aimed at promoting fair lending practices in the banking and financial services industries. A brief description of selected federal laws aimed at promoting fair lending follows:

The 1968 Fair Housing Act prohibits discrimination in housing based on race, color, religion, and national origin. Later amendments added sex, familial status, and disability. Under the Fair Housing Act, it is illegal to discriminate against any of the protected classes in the following types of residential real estate transactions: making loans to buy, build, or repair a dwelling; selling, brokering, or appraising residential real estate; and selling or renting a dwelling.

The Equal Credit Opportunity Act was passed in 1974 and prohibits discrimination in lending based on race, color, religion, national origin, sex, marital status, age, receipt of public assistance, and the exercise of any right under the Consumer Credit Protection Act.

The Community Reinvestment Act was enacted in 1977 and requires each federal financial supervisory agency to encourage financial institutions in order to help meet the credit needs of the entire community, including low- and moderate-income neighborhoods.

Under the Home Mortgage Disclosure Act (HMDA), enacted in 1975 and later amended, financial institutions are required to publicly disclose the race, sex, ethnicity, and household income of mortgage applicants by the Census tract in which the loan is proposed as well as outcome of the loan application. The analysis presented herein is from the HMDA data system.

The HMDA requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans. Both types of lending institutions must meet the following set of reporting criteria:

The institution must be a bank, credit union, or savings association;

The total assets must exceed the coverage threshold;

The institution must have had an office in a Metropolitan Statistical Area (MSA);

The institution must have originated at least one home purchase loan or refinancing of a home purchase loan secured by a first lien on a one- to four-family dwelling;

The institution must be federally insured or regulated; and

The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to the Federal National Mortgage Association (FNMA or Fannie Mae) or the Federal Home Loan Mortgage Corporation (FHLMC or Freddie Mac). These agencies purchase mortgages from lenders and repackage them as securities for investors, making more funds available for lenders to make new loans.

For other institutions, including non-depository institutions, additional reporting criteria are as follows:

The institution must be a for-profit organization;

The institution's home purchase loan originations must equal or exceed 10 percent of the institution's total loan originations, or more than $25 million;

The institution must have had a home or branch office in an MSA or have received applications for, originated, or purchased five or more home purchase loans, home improvement loans, or refinancing mortgages on property located in an MSA in the preceding calendar year; and

The institution must have assets exceeding $10 million or have originated 100 or more home purchases in the preceding calendar year.

HMDA data represent most mortgage lending activity and are thus the most comprehensive collection of information available regarding home purchase originations, home remodel loan originations, and refinancing. The Federal Financial Institutions Examination Council (FFIEC) makes HMDA data available on its website. While HMDA data are available for more years than are presented in the following pages, modifications were made in 2016 for documenting loan applicants' race and ethnicity, so data are most easily compared after that point.

Using the loan data submitted by the financial institutions, the Federal Financial Institutions Examination Council (FFIEC) creates aggregate tables for each metropolitan statistical area (MSA) or metropolitan division (MD) (where appropriate), and individual institution disclosure reports. The FFIEC provides the HMDA databases online as raw data and with retrieval software on compact disk. Data can be retrieved or ordered at their website http://www.ffiec.gov/hmda/hmdaproducts.htm.The data contain variables that facilitate analysis of mortgage lending activity, such as race, income, census tract, loan type, and loan purpose. These loans were for the purchase of an owner-occupied, one-to-four family dwelling, as reported by HMDA.

Loans Purchased, by location of property and type of loan, 2022

Census Tract or County	FHA, FSA/RHS & VA		Conventional		Refinancings		Home Improvement Loans		Loans on Dwellings For 5 or More Families		Nonoccupant Loans From Columns A, B, C, and D		Loans On Manufactured Home Dwellings From Columns A, B, C, & D	
	A		B		C		D		E		F		G	
	Number	$Amount	Number	$Amount	Number	$Amount	Number	$Amount	Number	$Amount	Number	$Amount	Number	$Amount
Bradley County/Tennessee/010100	9	2275000	11	2355000	5	745000	0	0	0	0	1	125000	0	0
Bradley County/Tennessee/010201	4	950000	7	2625000	5	1355000	0	0	0	0	1	235000	0	0
Bradley County/Tennessee/010202	5	1435000	9	1705000	8	1920000	0	0	0	0	0	0	0	0
Bradley County/Tennessee/010300	11	2285000	3	485000	3	275000	0	0	0	0	0	0	1	135000
Bradley County/Tennessee/010400	0	0	4	460000	0	0	0	0	0	0	1	55000	0	0
Bradley County/Tennessee/010500	2	550000	3	1175000	3	665000	0	0	0	0	1	185000	0	0
Bradley County/Tennessee/010600	8	1940000	5	1185000	6	1420000	0	0	0	0	2	270000	0	0
Bradley County/Tennessee/010700	7	1295000	6	550000	2	220000	0	0	0	0	0	0	0	0
Bradley County/Tennessee/010800	6	1240000	8	1420000	5	615000	0	0	0	0	5	635000	0	0
Bradley County/Tennessee/010900	9	1735000	6	1400000	9	1375000	0	0	0	0	2	280000	0	0
Bradley County/Tennessee/011000	15	3055000	8	1310000	13	1625000	0	0	0	0	5	625000	1	135000
Bradley County/Tennessee/011101	15	4105000	14	3610000	16	3740000	0	0	0	0	0	0	3	445000
Bradley County/Tennessee/011102	13	2855000	4	1020000	8	2210000	0	0	0	0	0	0	1	105000
Bradley County/Tennessee/011201	27	7445000	24	5590000	17	3435000	0	0	0	0	2	260000	2	330000
Bradley County/Tennessee/011203	8	2450000	16	5100000	6	1710000	0	0	0	0	1	235000	0	0
Bradley County/Tennessee/011204	7	2045000	16	5220000	11	2195000	0	0	0	0	3	445000	0	0
Bradley County/Tennessee/011301	6	1770000	6	1450000	19	5205000	0	0	0	0	2	310000	1	155000
Bradley County/Tennessee/011302	3	585000	1	325000	6	2460000	0	0	0	0	0	0	0	0
Bradley County/Tennessee/011402	8	2140000	4	1200000	2	550000	0	0	0	0	3	875000	0	0
Bradley County/Tennessee/011403	6	1810000	12	2700000	8	2300000	0	0	0	0	1	135000	0	0
Bradley County/Tennessee/011404	9	3135000	22	6490000	7	1485000	1	65000	0	0	1	265000	0	0
Bradley County/Tennessee/011501	11	3225000	12	3500000	11	2465000	0	0	0	0	1	595000	1	155000
Bradley County/Tennessee/011502	4	2140000	11	3315000	8	1800000	0	0	0	0	0	0	0	0
Bradley County/Tennessee/011601	17	4705000	12	3220000	11	2415000	0	0	0	0	2	330000	1	185000
Bradley County/Tennessee/011602	7	1505000	6	1510000	9	1895000	0	0	0	0	1	145000	1	145000
NA/NA/	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Polk County/Tennessee/950100	3	555000	4	930000	0	0	0	0	0	0	0	0	1	155000
Polk County/Tennessee/950201	4	970000	2	660000	2	350000	0	0	0	0	0	0	1	135000
Polk County/Tennessee/950203	7	1855000	4	600000	3	855000	0	0	0	0	2	300000	1	215000
Polk County/Tennessee/950204	7	1715000	4	1690000	9	2115000	0	0	0	0	1	525000	1	225000
Polk County/Tennessee/950300	4	790000	4	1430000	6	2020000	0	0	0	0	1	525000	3	415000
Polk County/Tennessee/950400	3	545000	5	1435000	4	1140000	0	0	0	0	2	620000	1	175000

MSA/MD: 17420 - Cleveland, TN
Loans on 1- to 4-Family and Manufactured Home Dwellings
Home Purchase Loans

Table 32: FFIEC HMDA https://ffiec.cfpb.gov/data-publication/aggregate-reports/2022/TN/17420/2

HMDA provided the disposition of various types of loan products at the Census Tract level, which were extracted and displayed for each individual tract that comprises the City. These tracts were analyzed to identify those whose median income (in relation to the MSA) fell below that of the City as a whole, and those with a significantly higher minority concentration than the citywide rate. Specifically, data was analyzed pertaining to the disposition of loan applications by the minority and income characteristics of the census tract in which the subject property of the loan was located to identify if there were any discernible patterns that might suggest discriminatory lending practices based on race.

For purposes of this analysis, a "minority" tract is defined as a census tract where the minority concentration is at least 5% greater than that of the City as a whole. In order to accurately portray HMDA data for the City, only those tracts that were either entirely within the City or whose area fell predominantly within City boundaries were utilized. Certain tracts where only a small area fell within

the City boundaries were excluded from the calculations. It should be noted, discriminatory lending practices cannot be definitively identified by correlation of HMDA data elements; however, the data can display real patterns in lending to indicate potential problem areas. HMDA data is available for the three-year period, the most recent years, 2022.

After the owner-occupied home purchase loan application is submitted, the applicant receives one of the following status designations:

- "Originated," which indicates that the loan was made by the lending institution;
- "Approved but not accepted," which notes loans approved by the lender but not accepted by the applicant;
- "Application denied by financial institution," which defines a situation wherein the loan application failed;
- "Application withdrawn by applicant," which means that the applicant closed the application process; "File closed for incompleteness" which indicates the loan application process was closed by the institution due to incomplete information; or
- "Loan purchased by the institution," which means that the previously originated loan was purchased on the secondary market.

Among the tracts analyzed, there were 3,423 loan applications submitted for purchase, refinancing, improvement of owner-occupied homes, and FHA/VA loans. Of this total, 1,077 (31.4%) of all applications were denied. Our analysis will focus largely on the characteristics of those applications that were denied.

	Disposition of loan applications, by race and sex of applicant, 2022											
	MSA/MD: 17420 - Cleveland, TN											
RACE AND SEX	Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness		Purchased Loans	
	Number	$Amount	Number	$Amount	Number	$Amount	Number	$Amount	Number	$Amount	Number	$Amount
American Indian or Alaska Native												
Male	9	1485000	0	0	8	1010000	6	1230000	2	360000	0	0
Female	5	1045000	0	0	2	230000	6	860000	0	0	0	0
Joint	1	135000	0	0	0	0	0	0	0	0	0	0
Sex Not Available	0	0	0	0	0	0	0	0	0	0	0	0
Total	15	2665000	0	0	10	1240000	12	2090000	2	360000	0	0
Asian												
Male	18	3700000	0	0	5	495000	5	1375000	1	395000	1	175000
Female	12	2320000	0	0	5	695000	5	1045000	0	0	2	650000
Joint	13	3815000	0	0	1	245000	2	580000	0	0	2	680000
Sex Not Available	0	0	0	0	0	0	0	0	0	0	0	0
Total	43	9835000	0	0	11	1435000	12	3000000	1	395000	5	1505000
Black or African American												
Male	37	8015000	1	165000	23	4685000	17	3585000	7	1125000	2	380000
Female	28	5850000	4	570000	18	2860000	9	1675000	2	350000	0	0
Joint	14	4350000	0	0	3	265000	9	2085000	0	0	0	0
Sex Not Available	0	0	0	0	0	0	0	0	0	0	0	0
Total	79	18215000	5	735000	44	7810000	35	7345000	9	1475000	2	380000
Native Hawaiian or Other Pacific Islander												
Male	1	195000	0	0	1	125000	3	1065000	0	0	0	0
Female	2	280000	0	0	1	55000	0	0	0	0	0	0
Joint	0	0	0	0	0	0	1	335000	0	0	0	0
Sex Not Available	0	0	0	0	0	0	0	0	0	0	0	0
Total	3	475000	0	0	2	180000	4	1400000	0	0	0	0
White												
Male	983	206755000	54	9770000	310	43620000	301	64345000	147	25125000	57	11905000
Female	610	110060000	34	7240000	232	27800000	161	29535000	105	29715000	43	8215000
Joint	1263	293885000	48	9790000	284	42290000	276	65470000	106	19150000	87	22105000
Sex Not Available	8	1500000	0	0	8	1220000	9	895000	3	515000	0	0
Total	2864	612200000	136	26800000	834	1.15E+08	747	160245000	361	74505000	187	42225000
2 or more minority races												
Male	3	805000	0	0	2	570000	2	170000	0	0	0	0
Female	0	0	0	0	2	140000	1	65000	2	300000	0	0
Joint	0	0	0	0	0	0	0	0	0	0	0	0
Sex Not Available	0	0	0	0	0	0	0	0	0	0	0	0
Total	3	805000	0	0	4	710000	3	235000	2	300000	0	0
Joint												
Male	0	0	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	1	115000	0	0
Joint	39	10535000	1	185000	15	2895000	12	3320000	2	200000	3	765000
Sex Not Available	0	0	0	0	0	0	0	0	0	0	0	0
Total	39	10535000	1	185000	15	2895000	12	3320000	3	315000	3	765000
Free Form Text Only												
Male	0	0	0	0	0	0	0	0	0	0	0	0
Female	0	0	0	0	0	0	0	0	0	0	0	0
Joint	0	0	0	0	0	0	0	0	0	0	0	0
Sex Not Available	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0	0	0
Race Not Available												
Male	77	20065000	6	630000	35	6775000	35	8905000	14	2750000	2	410000
Female	31	5455000	2	420000	11	1855000	22	3200000	7	1125000	0	0
Joint	53	11975000	2	450000	22	4550000	19	5305000	7	1065000	2	560000
Sex Not Available	216	69130000	22	4780000	89	15625000	72	17470000	30	6120000	553	137095000
Total	377	106625000	32	6280000	157	28805000	148	34880000	58	11060000	557	138065000

Table 33: FFIEC, HMDA, https://ffiec.cfpb.gov/data-publication/aggregate-reports/2022/TN/17420/3

Overall, the data indicates that the elevated denial rate among tracts appears to be based on the income and racial/ethnic characteristics of the tract. The HMDA data also suggests that there may be discriminatory lending based on race/ethnicity of property location within the City as well as income characteristics. A definitive conclusion would require a greater degree of analysis

taking into consideration additional data not available from HMDA at the geographic level specific to the City.

H. Segregation, Integration & RECAPs

Segregation Indices

Residential segregation can be measured using statistical tools called the dissimilarity index. and the isolation index. These indices measure the degree of separation between racial or ethnic groups living in a community. An extreme example of segregation would be an exactly equivalent split between predominantly high income, White, suburban communities and low income, minority, inner-city neighborhoods. For this analysis, racial statistics for each census tract in the municipality were compared. Since White residents are the majority in the City, all other racial and ethnic groups were compared to the White population as a baseline.

The index of dissimilarity allows for comparisons between subpopulations (i.e. different races), indicating how much one group is spatially separated from another within a community. In other words, it measures the evenness with which two groups are distributed across the neighborhoods that make up a community. The index of dissimilarity is rated on a scale from 0 to 100, in which a score of 0 corresponds to perfect integration and a score of 100 represents total segregation. Typically, a score under 30 is considered low, between 30 and 60 is moderate, and above 60 is high.

The index of isolation compares the proportion of a group in a neighborhood to the proportion of the group in a larger area. Conceptually, the isolation index measures the extent of exposure or the probability that a member of a minority group will interact with only other members of that group. For example, if Hispanics tend to live in almost entirely Hispanic neighborhoods, the isolation index will be high. The isolation index is rated on a scale from 0 to 100, in which a score of 0 corresponds to maximum interaction and a score of 100 represents complete isolation. Dissimilarity and isolation are related to each other. The main difference is that the dissimilarity index does not take into account the relative size of the groups, but the isolation index does.

The history of housing segregation is marked by implicit and explicit forms of social and spatial discrimination including redlining, segregation, and disparities in lending. The result of these practices around the country was the enactment of the Fair Housing Act in 1968, which was designed to address inequality in mortgage lending and homeownership and curb explicit discriminatory practices by landlords who avoided renting to minorities. Since the enactment of the FHA, progress has been made, but patterns of segregation and housing discrimination remain major impediments to social and economic mobility for those identified as protected classes. This chapter explores segregation and integration patterns in Cleveland using federal and local data to understand segregation and its impact on city residents.

Unless there is complete integration, the average racial composition of neighborhoods where whites live differs from the average racial composition of neighborhoods lived in by blacks, by

Hispanics, or by other groups. To examine this, we calculate the average racial composition of neighborhoods experienced by members of each racial group. These are sometimes referred to as "exposure indices". This is because they show the exposure a given race group experiences with members of their own and each other race (percentage to 100) in an average neighborhood of the city (or metropolitan area) being examined. In the table below, the first five columns represent the average racial composition of the neighborhood of a person of a given race.
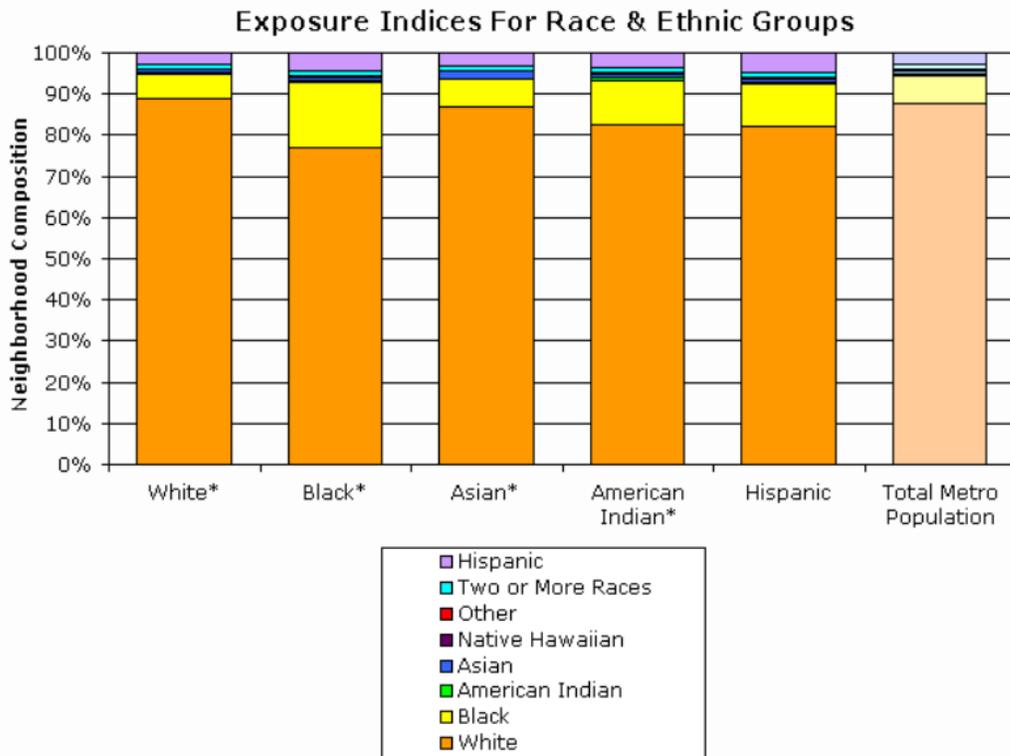
Exposure Indices for Racial Groups

	White*	Black*	American Indian*	Asian*	Native Hawaiian*	Other*	Mixed*	Hispanic	Total
White*	88.8%	6.1%	0.2%	1.0%	0.0%	0.1%	1.2%	2.7%	100.0%
Black*	76.9%	16.0%	0.3%	0.9%	0.0%	0.2%	1.5%	4.3%	100.0%
Asian*	87.1%	6.5%	0.2%	1.7%	0.0%	0.1%	1.2%	3.2%	100.0%
American Indian*	82.5%	11.0%	0.6%	0.8%	0.1%	0.3%	1.2%	3.8%	100.0%
Hispanic	82.0%	10.4%	0.2%	1.1%	0.0%	0.2%	1.4%	4.6%	100.0%
Total Metro Population	87.7%	7.0%	0.2%	1.0%	0.0%	0.1%	1.2%	2.9%	100.0%

* Non-Hispanic only.

Figure 5: Source: Census Scope, https://www.censusscope.org/us/s47/p51560/chart_exposure.html

SEGREGATION: DISSIMILARITY INDICES

The dissimilarity index measures the relative separation or integration of groups across all neighborhoods of a city or metropolitan area. If a city's white-black dissimilarity index were 65, that would mean that 65% of white people would need to move to another neighborhood to make whites and blacks evenly distributed across all neighborhoods.

Dissimilarity Indices

	Dissimilarity Index With Whites*	Population**	Percent of Total Population
White*	--	32,611	87.68%
Black*	40.8	2,588	6.96%
American Indian*	47.2	69	0.19%
Asian*	34.7	355	0.95%
Native Hawaiian*	75.8	11	0.03%
Other*	57.0	42	0.11%
Two or More Races*	24.3	450	1.21%
White/Black*	40.0	107	0.29%
White/American Indian*	33.3	168	0.45%
White/Asian*	46.9	38	0.10%
White/Other*	59.8	54	0.15%
Other Combinations*	--	83	0.22%
Hispanic	31.2	1,066	2.87%
Total	--	37,192	100.00%

* Non-Hispanic only.

* When a group's population is small, its dissimilarity index may be high even if the group's members are evenly distributed throughout the area. Thus, when a group's population is less than 1,000, exercise caution in interpreting its dissimilarity indices.

Figure 6: Source: https://censusscope.org/us/s47/p15400/chart_dissimilarity.html

III. ACCESS TO OPPORTUNITY

Access to opportunity measures poverty, local conditions, access to jobs, education, healthy and safe living conditions, public services and amenities, which are critical factors to consider when measuring fair housing choice. Social research has demonstrated negative effects of residential segregation on income and opportunity for minority families, who are commonly concentrated in communities "characterized by older housing stock, slow growth, and low tax bases – the resources that support public services and schools."[1] Households living in lower-income areas of racial and ethnic concentration have fewer opportunities for education, wealth building, and employment.[2]

To describe the variation in neighborhood opportunity across regions, HUD has adopted a "Communities of Opportunity" model based on research developed by The Kirwan Institute for the Study of Race and Ethnicity at Ohio State University. Communities of Opportunity is a framework that assigns each neighborhood a score reflecting the degree to which its residents have access to amenities and services such as good schools, jobs, stable housing, transit, low crime, and minimal health hazards.

HUD and the Institute draw upon an extensive research base demonstrating the importance of neighborhood conditions in predicting life outcomes. The ultimate goals of the exercise are to bring opportunities to amenity-deprived areas and to connect people to existing opportunities throughout a region. The Institute argues that "we need to assess the geographic differences in resources and opportunities across a region to make informed, affirmative interventions into failures and gaps in 'free market' opportunities."

The Communities of Opportunity model is highly spatial and therefore map-based, generating a geographic footprint of inequality. The process of creating opportunity maps involves building a set of indicators that reflect local issues and are also based on research that validates the connections between the indicators and increased opportunity. Data is collected at the smallest geographic unit possible for each indicator and organized into sectors (prosperity, mobility, etc.), which are then combined to create a composite opportunity map. The resulting maps allow communities to analyze opportunity, "comprehensively and comparatively, to communicate who

---

[1] Orfield, Myron. "Land Use and Housing Policies to Reduce Concentrated Poverty and Racial Segregation." Fordham Urban Law Journal. Volume 33, Issue 3, 2005.

[2] Turner, Margery, et al. "Discrimination in Metropolitan Housing Markets: National Results from Phase I HDS 2000. Urban Institute. Online: huduser.org/Publications/pdf/Phase1_Report.pdf

has access to opportunity-rich areas and who does not, and to understand what needs to be remedied in opportunity-poor communities," according to the Institute.

Overview of HUD-Defined Opportunity Factors

Among the many factors that drive housing choice for individuals and families are neighborhood characteristics including access to quality schools, jobs, transit, and a healthy environment. To measure these conditions at a neighborhood level, HUD developed a methodology to quantify the degree to which a neighborhood provides such opportunities. For each block group in the U.S., HUD provides a score on several "opportunity dimensions," including school proficiency, poverty, labor market engagement, job proximity, transportation costs, transit trips, and environmental health. In addition to proximity, access to opportunity is also shaped by economic, social, and cultural factors. For example, residents may live in locations with high numbers of jobs but may be unable to obtain them due to gaps in education or skills, a lack of reliable transportation, or childcare needs. In this way, limited housing choices reduce access to opportunity for many protected classes.

The following sections provide definitions of each opportunity indicator as defined in HUD's AFFH-T Data Documentation and the description of the City of Cleveland findings for each index. Values for each factor range from 0-to-100 with zero representing a low score and less access to opportunity and one hundred representing a high score and more access to opportunity. Higher scores, and darker shading on the figures, indicate a greater access to opportunity[3].

Low Poverty Index

The Low Poverty Index measures poverty in a community, a higher score represents a more prosperous community with lower levels of poverty. This indicator measures rates of family poverty and the receipt of public assistance, such as cash welfare. The table below shows Poverty Index scores across race and ethnicity.

The table below reflects that the Black Non-Hispanic Community and the Native American, Non-Hispanic communities are the least prosperous and experience the most poverty in the city. The Asian/Pacific Islander, Non-Hispanic community experiences poverty less than other racial/ethnic groups. These factors are consistent across Cleveland, the jurisdiction and region.

---

[3] Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) Data & Maps, https://egis.hud.gov/affht/

Low Poverty Index		
	(Cleveland, TN CDBG) Jurisdiction	**Cleveland, TN Region**
Total Population		
White, Non-Hispanic	29.90	36.62
Black, Non-Hispanic	20.41	26.25
Hispanic	25.58	30.68
Asian or Pacific Islander, Non-Hispanic	35.67	38.2
Native American, Non-Hispanic	23.04	32.92
Population below federal poverty line		
White, Non-Hispanic	21.91	32.02
Black, Non-Hispanic	18.15	20.07
Hispanic	21.94	29.96
Asian or Pacific Islander, Non-Hispanic	22.47	26.18
Native American, Non-Hispanic	5.37	7.86

Table 34: HUD AFFH Mapping Tool, https://egis.hud.gov/affht/
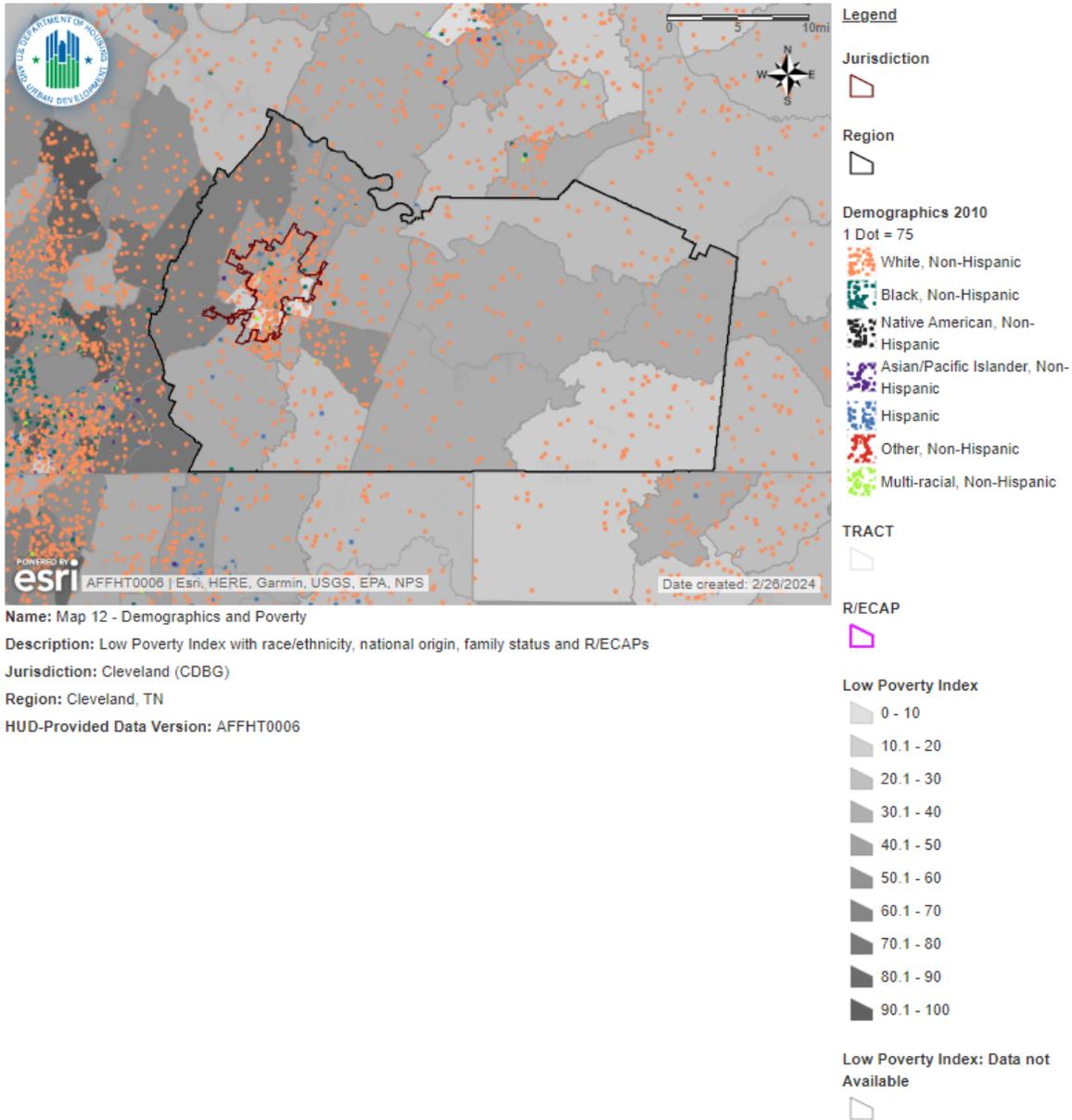
Figure 6: Low Poverty Index -HUD AFFH Mapping Tool, https://egis.hud.gov/affht/

School Proficiency Index

The School Proficiency Index measures the quality of the school systems in a community. The higher the score, the higher the school system met HUD's definition of proficiency. This indicator uses school-level data on the performance of fourth-grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower-performing elementary schools.

In the School Proficiency Index table below, it is shown that in the City of Cleveland, Asian or Pacific Islander Non-Hispanic and Hispanic Communities have the most access to quality schools even when in poverty. While the Hispanic and Black Non-Hispanic communities have the least access to quality schools in the city. The same characteristics exist for the Region in which the Hispanic and Black Non-Hispanic communities have the least access to quality schools.

School Proficiency Index		
	(Cleveland, TN CDBG) Jurisdiction	Cleveland, TN Region
Total Population		
White, Non-Hispanic	52.21	58.64
Black, Non-Hispanic	44.00	49.25
Hispanic	50.15	54.42
Asian or Pacific Islander, Non-Hispanic	57.48	60.77
Native American, Non-Hispanic	46.88	55.96
Population below federal poverty line		
White, Non-Hispanic	45.52	51.79
Black, Non-Hispanic	41.36	44.42
Hispanic	52.42	54.4
Asian or Pacific Islander, Non-Hispanic	45.70	51.12
Native American, Non-Hispanic	40.18	45.28

Table 35: HUD AFFH Mapping Tool, https://egis.hud.gov/affht/

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

Legend

Jurisdiction

Region

Demographics 2010
1 Dot = 75
- White, Non-Hispanic
- Black, Non-Hispanic
- Native American, Non-Hispanic
- Asian/Pacific Islander, Non-Hispanic
- Hispanic
- Other, Non-Hispanic
- Multi-racial, Non-Hispanic

TRACT

R/ECAP

School Proficiency Index
- 0 - 10
- 10.1 - 20
- 20.1 - 30
- 30.1 - 40
- 40.1 - 50
- 50.1 - 60
- 60.1 - 70
- 70.1 - 80
- 80.1 - 90
- 90.1 - 100

School Proficiency Index: Data not Available

Name: Map 7 - Demographics and School Proficiency
Description: School Proficiency Index for Jurisdiction and Region with race/ethnicity, national origin, family status, and R/ECAPs
Jurisdiction: Cleveland (CDBG)
Region: Cleveland, TN
HUD-Provided Data Version: AFFHT0006

Figure 7: School Proficiency Index -HUD AFFH Mapping Tool, https://egis.hud.gov/affht/

Labor Market Engagement Index

The Labor Market Engagement Index measures a community's level of employment, labor force participation, and educational attainment in a community the higher the score, and the higher the opportunity for engagement in the labor market.

In the table below, Asian or Pacific Islander Non-Hispanic and White Non-Hispanic and Hispanic communities have the most labor market engagement even when in poverty. In contrast, the Black, Non-Hispanic and Native American, Non-Hispanic communities have the least Labor

market engagement. In the Cleveland Region, the higher labor market engagement varies slightly as Hispanic individuals are more engaged in the labor market despite being below the federal poverty line.

Labor Market Index		
	(Cleveland, TN CDBG) Jurisdiction	Cleveland, TN Region
Total Population		
White, Non-Hispanic	33.76	30.36
Black, Non-Hispanic	24.96	27.10
Hispanic	31.34	30.85
Asian or Pacific Islander, Non-Hispanic	39.00	37.39
Native American, Non-Hispanic	27.35	26.91
Population below federal poverty line		
White, Non-Hispanic	26.63	26.43
Black, Non-Hispanic	23.23	24.02
Hispanic	25.02	28.13
Asian or Pacific Islander, Non-Hispanic	21.41	23.60
Native American, Non-Hispanic	4.87	5.75

Table 36: HUD AFFH Mapping Tool, https://egis.hud.gov/affht/

Transit Index

The Transit Index measures the utilization of public transportation in a community. Transit access describes the accessibility of amenities using public transit. The higher the score, the more likely residents in that community utilize public transit. This indicator estimates transit trips taken by families that: are a 3-person single-parent family with income at 50 percent of the median income for renters for the region (i.e., the Core-Based Statistical Area (CBSA)).

Based on these parameters, transit use is utilized at a consistent rate across racial and ethnic communities within the Cleveland Jurisdiction and Region. The Native American, Non-Hispanic community below the poverty utilizes transit at the most based on scores.

Transit Index		
	(Cleveland, TN CDBG) Jurisdiction	Cleveland, TN Region
Total Population		
White, Non-Hispanic	21.04	15.25
Black, Non-Hispanic	23.87	20.36
Hispanic	23.59	19.98
Asian or Pacific Islander, Non-Hispanic	19.95	17.21
Native American, Non-Hispanic	23.81	16.90
Population below federal poverty line		
White, Non-Hispanic	23.36	16.92
Black, Non-Hispanic	24.13	22.53
Hispanic	25.57	19.33
Asian or Pacific Islander, Non-Hispanic	28.40	26.77
Native American, Non-Hispanic	39.16	33.40

Table 37: HUD AFFH Mapping Tool, https://egis.hud.gov/affht/

Low Transportation Cost Index

The Low Transportation Cost Index estimates transportation costs for families that are a 3-person single-parent family with income at 50% of the median income for renters for the region (i.e., MSA).

The table below shows the Low Transportation Cost Index scores across race and ethnicity. In this table, it is shown that White, Non-Hispanic and Asian, Non-Hispanic communities have the lowest transit costs, and this trend is similar to the Cleveland region for low transit costs. In comparison, Black, Non-Hispanic and Native-American, Non-Hispanic communities spend the most on transit in Cleveland.

Low Transportation Cost Index		
	(Cleveland, TN CDBG) Jurisdiction	Cleveland, TN Region
Total Population		
White, Non-Hispanic	23.21	14.62
Black, Non-Hispanic	27.09	22.13
Hispanic	25.87	20.17
Asian or Pacific Islander, Non-Hispanic	22.44	17.63
Native American, Non-Hispanic	26.28	16.17
Population below federal poverty line		
White, Non-Hispanic	25.83	17.03
Black, Non-Hispanic	28.18	26.26
Hispanic	26.82	20.13
Asian or Pacific Islander, Non-Hispanic	23.16	20.74
Native American, Non-Hispanic	37.47	32.93

Table 38: HUD AFFH Mapping Tool, https://egis.hud.gov/affht/
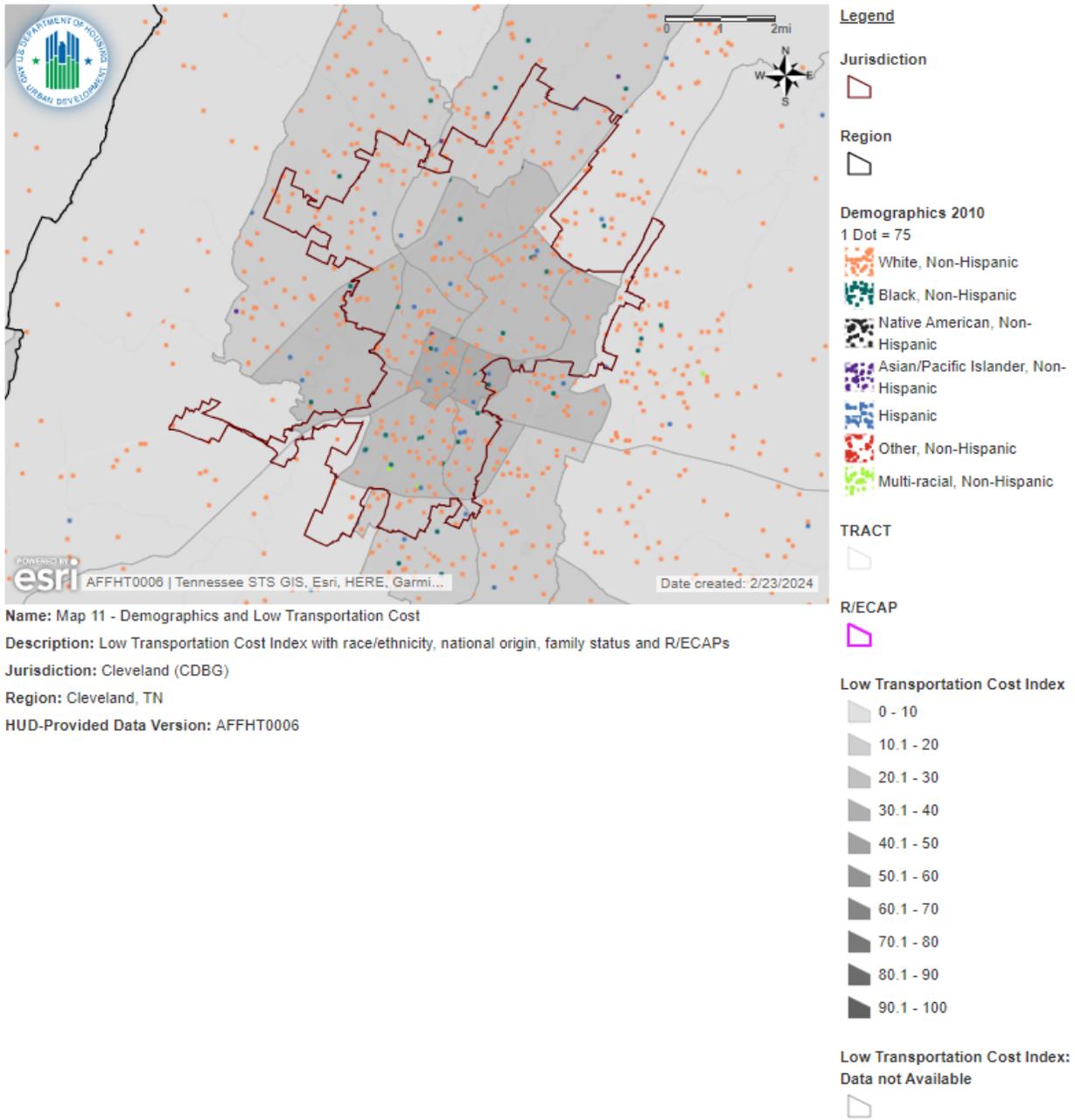
Figure 8: Low Transportation: HUD AFFH Mapping Tool, https://egis.hud.gov/affht/

Jobs Proximity Index

The Jobs Proximity Index measures the distance of job locations from a community. Greater weight is given to larger employment centers. The competition for a job location measured by labor supply is inversely weighted. The table below reflects the Jobs Proximity Index scores across race and ethnicity. In this table, it is displayed that the total population lives closest to where they work in Cleveland than, comparatively, in the Region. Asian or Pacific Islander, Non-Hispanic community lives the furthest from jobs in the jurisdiction.

Job Proximity Index		
	(Cleveland, TN CDBG) Jurisdiction	**Cleveland, TN Region**
Total Population		
White, Non-Hispanic	71.62	45.01
Black, Non-Hispanic	74.03	66.56
Hispanic	72.80	60.29
Asian or Pacific Islander, Non-Hispanic	72.25	62.47
Native American, Non-Hispanic	71.31	44.29
Population below federal poverty line		
White, Non-Hispanic	71.08	47.83
Black, Non-Hispanic	75.03	71.82
Hispanic	71.10	58.39
Asian or Pacific Islander, Non-Hispanic	66.21	63.36
Native American, Non-Hispanic	71.64	64.37

Table 39: HUD AFFH Mapping Tool, https://egis.hud.gov/affht/

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

Legend

Jurisdiction

Region

Demographics 2010
1 Dot = 75
White, Non-Hispanic
Black, Non-Hispanic
Native American, Non-Hispanic
Asian/Pacific Islander, Non-Hispanic
Hispanic
Other, Non-Hispanic
Multi-racial, Non-Hispanic

TRACT

R/ECAP

Low Transportation Cost Index
0 - 10
10.1 - 20
20.1 - 30
30.1 - 40
40.1 - 50
50.1 - 60
60.1 - 70
70.1 - 80
80.1 - 90
90.1 - 100

Low Transportation Cost Index: Data not Available

AFFHT0006 | Tennessee STS GIS, Esri, HERE, Garmi...   Date created: 2/23/2024

Name: Map 11 - Demographics and Low Transportation Cost
Description: Low Transportation Cost Index with race/ethnicity, national origin, family status and R/ECAPs
Jurisdiction: Cleveland (CDBG)
Region: Cleveland, TN
HUD-Provided Data Version: AFFHT0006

Figure 9: Jobs Proximity: HUD AFFH Mapping Tool, https://egis.hud.gov/affht/

Environmental Health Index

The environmental health index measures the environmental quality of a community. The higher the score, the less exposure a community has to harmful environmental toxins. The index measures the potential for exposure to harmful toxins within a community, as determined by the Environmental Protection Agency's Toxic Release Inventory by volume and toxicity. As reflected

in the table below, the Environmental Health Index scores for Cleveland are listed by race, ethnicity, and poverty. In this table, we see that the Asian or Pacific Islander community has the greatest exposure to environmental toxins in Cleveland, while in the Region, the Black community has the greatest exposure for environmental toxins. For communities below the federal poverty level, the Native American, Non-Hispanic community has the greatest exposure to environmental toxins.

Environmental Health Index		
	(Cleveland, TN CDBG) Jurisdiction	Cleveland, TN Region
Total Population		
White, Non-Hispanic	3.38	17.30
Black, Non-Hispanic	2.54	5.32
Hispanic	2.65	8.51
Asian or Pacific Islander, Non-Hispanic	2.47	6.87
Native American, Non-Hispanic	3.36	18.76
Population below federal poverty line		
White, Non-Hispanic	3.30	17.61
Black, Non-Hispanic	2.41	3.18
Hispanic	2.35	9.44
Asian or Pacific Islander, Non-Hispanic	2.27	3.25
Native American, Non-Hispanic	1.51	7.34

Table 40: HUD AFFH Mapping Tool, https://egis.hud.gov/affht/

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

Legend

Jurisdiction

Region

Demographics 2010
1 Dot = 75
White, Non-Hispanic
Black, Non-Hispanic
Native American, Non-Hispanic
Asian/Pacific Islander, Non-Hispanic
Hispanic
Other, Non-Hispanic
Multi-racial, Non-Hispanic

TRACT

R/ECAP

Environmental Health Index
0 - 10
10.1 - 20
20.1 - 30
30.1 - 40
40.1 - 50
50.1 - 60
60.1 - 70
70.1 - 80
80.1 - 90
90.1 - 100

Environmental Health Index: Data not Available

Name: Map 13 - Demographics and Environmental Health

Description: Environmental Health Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: Cleveland (CDBG)

Region: Cleveland, TN

HUD-Provided Data Version: AFFHT0006

Figure 10: Environmental Health- HUD AFFH Mapping Tool, https://egis.hud.gov/affht/

IV. FAIR HOUSING TRENDS AND COMPLAINTS

Overview

Understanding fair housing trends and complaints is critical in assessing housing access free from discrimination. This chapter reviews the fair housing enforcement process and fair housing complaints filed at the local and federal levels to assess trends, emerging issues, and potential barriers to fair housing access, enforcement, and education in the context of Cleveland, TN.

The City of Cleveland is committed to furthering fair housing efforts by promoting fair and equal housing opportunities for its residents. It is committed to highlighting the Fair Housing Law, Title VIII of the Civil Rights Act of 1968 by continuing to address discrimination in our community and to support programs that will educate the public about the right to equal housing opportunities.

It is the City's policy to provide services without regard to race, color, ancestry, religion, national origin, age, gender, marital status, familial status, source of income, sexual orientation, or disability. This commitment extends to all grant-funded housing programs provided by the City.

What is Housing Discrimination?

Housing discrimination is unjust or prejudicial treatment of individuals, in the area of housing and real estate, based on the individual's protected class. Within the context of an increasingly diverse society, the potential for discrimination in housing choice remains an issue which must be vigilantly observed. In efforts to combat discrimination, federal and state laws have been enacted to provide a framework for ensuring fair housing choice.

Affirmatively Furthering Fair Housing

The Fair Housing Act has two goals: to end housing discrimination and to promote diverse, inclusive communities. The second goal is referred to as Affirmatively Furthering Fair Housing (AFFH), and it embodies our strongly-held American values of fair access and equal opportunity.

The Affirmatively Furthering Fair Housing provision was part of the Fair Housing Act when it was passed by Congress in 1968. Through that provision, Congress directed HUD to make sure that neither the agency itself, nor the cities, counties, states and public housing agencies it funds, discriminate in their programs. Further, Congress intended that HUD programs be used to expand housing choices and help make all neighborhoods places of opportunity, providing their residents with access to the community assets and resources they need to flourish.

Fair Housing Complaints

The Office of Fair Housing and Equal Opportunity [FHEO] administers federal laws and establishes national policies that make sure all Americans have equal access to the housing of their choice. Individuals who believe they are victims of housing discrimination can choose to file a fair housing complaint through the respective Regional FHEO. Typically, when a complaint is filed with the

agency, a case is opened and an investigation of the allegations of housing discrimination is reviewed.

If the complaint is not successfully mediated, the FHEO determines whether reasonable cause exists to believe that a discriminatory housing practice has occurred. Where reasonable cause is found, the parties to the complaint are notified by HUD's issuance of a "Determination", as well as a "Charge of Discrimination", and a hearing is scheduled before a HUD administrative law judge. Either party [complainant or respondent] may cause the HUD-scheduled administrative proceeding to be terminated by electing instead to have the matter litigated in Federal court.

Complaints Filed With HUD

Region IV of the Office of Fair Housing and Equal Opportunity (FHEO) receives complaints by households regarding alleged violations of the Fair Housing Act for cities and counties throughout Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, Puerto Rico/Virgin Islands, South Carolina, and Tennessee. The mission of the FHEO is to protect individuals from employment, housing, and public accommodation discrimination, and hate violence. To achieve this mission, the FHEO maintains databases of and investigates complaints of housing discrimination, as well as complaints in the areas of employment, housing, public accommodations, and hate violence.

Complaints filed with HUD are classified by race, national origin, disability, familial status, religion, sex and retaliation bases. FHEO investigates complaints which may be of one or both of the following types:

- Discrimination under the Fair Housing Act (including housing that is privately owned and operated)
- Discrimination and other civil rights violations in housing and community development programs, including those funded by HUD.

Complaints involving discrimination under the Fair Housing Act may be applied in cases where one's discrimination in renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing-related activities are violated. The filing of these complaints may be against property owners, property managers, developers, real estate agents, mortgage lenders, homeowner associations, insurance providers, and others who affect housing opportunities.

Complaints involving discrimination in housing and community development programs may be based on the violation of rights because of discrimination and other violations of civil rights in HUD programs. For example, the failure to ensure meaningful access by persons with limited English proficiency. Applicable laws include:

- Title VI of the Civil Rights Act of 1964 (race, color, national origin)
- Section 109 of the Housing and Community Development Act of 1974

- Section 504 of the Rehabilitation Act of 1973 (disability)
- Title II of the American with Disabilities Act of 1990
- Architectural Barriers Act of 1968
- Age Discrimination Act of 1975
- Title IX of the Education Amendments Act of 1972

Complaints may be filed against any recipient or sub-recipient of HUD financial assistance, including states, local governments, and private entities operating housing and community development and other types of services, programs, or activities.

From January 1, 2019 through December 31, 2023, the period for which data was available for this assessment Cleveland recorded 31 complaints filed with FHEO. As previously mentioned, cases to FHEO can be filed based on one or several reasons. As the table below highlights, most of those cases (31) were filed on the basis of disability (11 cases), followed by race (7 cases). The height of the number of cases occurred in 2020 and 2021. Many factors may contribute to such change, such as better housing conditions, however the slight increase in cases filed in 2021 indicates that the recent COVID related volatility of housing issues in the may require continued monitoring and public education regarding fair housing rights and the grievance process.

YEAR	Fair Housing Act – Protected Classes							RETALIATION	YEAR TOTALS
	DISABILITY	RACE	FAMILIAL STATUS	COLOR	RELIGION	NATIONAL ORIGIN	SEX		
2019	2	1	-	-	-	-	-	1	4
2020	4	1	-	-	-	-	-	1	5
2021	3	4	-	-	-	-	6	2	7
2022	1	-	-	-	-	1	-	0	2
2023	1	1	-	-	1	-	-	1	3
	11	7	0	0	1	1	6	5	31

Complaint Trends

Over the last five years from 2019 to 2023 a total of 31 fair housing cases were filed with HUD. Complaints by type were most commonly made on the basis of disability, followed by race and sex. According to the National Fair Housing Alliance 2023 Fair Housing Trends Report, the number of complaints filed nationwide in 2022 was 33,007 which was the highest number of reported complaints

of housing discrimination since NFHA began collecting this data in 1995. Overall, the complaints were 5.74 percent higher than the previous year. Additionally, complaints based on source of income and domestic violence increased.

According to the report, there was an uptick in all the "other" category of complaints, regarding source of income, marital status, age, and domestic violence with significant increases in complaints regarding source of income and domestic violence. On March 16, 2022, President Biden signed the landmark act that reauthorized and strengthened the Violence Against Women Act (VAWA). VAWA includes protections for survivors of domestic violence who are applying for or residing in covered housing programs.

Overall, the 2022` National complaint data shows that private fair housing organizations continue to address the majority of housing discrimination complaints reported throughout the country. Local complaint trends reveal that while complaints have increased. Households that are mostly female-headed, low-income, and majority African American remain more likely to file a fair housing complaint. Interviews with stakeholders and the survey conducted for this assessment highlighted such consistency and the ongoing need to address the root causes of the fair housing issues.

While outreach and education efforts to inform the public on fair housing protections have resulted in significant progress for Cleveland all residents are provided fair housing choice and access.

Hate Crimes
Hate crimes are violent acts against people, property, or organizations motivated by a bias against race, gender, gender identity, religion, disability, ethnicity, or sexual orientation. In an attempt to determine the scope and nature of hate crimes, the Federal Bureau of Investigation's (FBI) Uniform Crime Reporting Program collects statistics on these incidents. However, it was not until early in the last decade that the federal government began to collect data on how many and what kind of hate crimes are being committed, and by whom.

Fair housing violations due to hate crimes occur when people will not consider moving into certain neighborhoods, or have been run off from their homes for fear of harassment or physical harm. The Federal Fair Housing Act makes it illegal to threaten, harass, intimidate or act violently toward a person who has exercised their right to free housing choice. Persons who break the law have committed a serious crime and can face time in prison, large fines or both, especially for violent acts, serious threats of harm, or injuries to victims. In addition, - similar state and local laws may be violated, leading to more punishment for those who are responsible. Some examples of illegal behavior include threats made in person, writing or by telephone; vandalism of the home or property; rock throwing; suspicious fires, cross-burning or bombing; or unsuccessful

attempts at any of these.

Reporting hate crimes is voluntary on the part of the local jurisdictions, and not all jurisdictions are represented in the reports. Another obstacle to gaining an accurate count of hate crimes is the reluctance of many victims to report such attacks.

Hate crime statistics compiled for the State of demonstrate that a total of 24 hate crimes were committed between 2020 and 2022. Harassing/threatening communications, criminal trespass, simple battery, terroristic threat and disorderly conduct are the most common hate crimes in the area.

CLEAVELAND, TN HATE CRIME STATISTICS			
Bias Motivation Category	2020	2021	2022
Race/Ethnicity/Ancestry	9	7	4
Religion	0	0	1
Sexual Orientation	0	3	0
Disability	0	0	0
Gender	0	0	0
Gender Identity	0	0	0
Total:	9	10	5

Table 14: Source: U.S. Department of Justice Federal Bureau of Investigation

V. REVIEW OF PRIOR AND CURRENT ACTIONS TAKEN TO AFFIRMATIVELY FURTHER FAIR HOUSING

Affirmatively Furthering Fair Housing

Affirmatively furthering fair housing requires overcoming historic patterns of segregation, promoting fair housing choice, and fostering an inclusive community. Identifying Cleveland's barriers to fair housing calls for the development of comprehensive strategies and timely actions to overcome existing impediments.

The Analysis of Impediments assesses previous actions taken and current conditions that may continue to restrict housing choice for people protected under State and federal fair housing laws.

With such an assessment in mind, this section presents the previously identified impediments to fair housing choice and a summary of the actions taken to address those challenges. The analysis and its results will help outline the underlying conditions and trends still relevant in Cleveland.

Effective Tuesday, September 8, 2020, HUD's "Preserving Community and Neighborhood Choice" Final Rule officially repealed HUD's 2015 housing rule known as "Affirmatively Furthering Fair Housing" or AFFH and the 1994 Analysis of Impediments to Fair Housing Choice (A.I.) where they appear in regulation. HUD's new housing rule is intended to lessen the paperwork burden on local grantees and empowering entitlement communities by giving them maximum flexibility in designing and implementing sound policies that reflect local needs by eliminating overly burdensome, intrusive, and inconsistent reporting and monitoring requirements.

HUD's new rule will still require that grantees commit to "use funds to take active steps to promote fair housing", however, the grantee AFFH certifications will be deemed sufficient provided the grantee took any action during the relevant time period related to promoting fair housing.

Previous Impediments to Fair Housing Choice

The previously identified impediments to fair housing choice in Cleveland's 2019 AI are listed below. The impediments identified are not listed in any order or priority. The analysis and status of these impediments are based on the data available at the time and the feedback provided by community members and stakeholders. An analysis of past and existing trends is further addressed in other sections of this document.

As presented in the 2019 Analysis of Impediments to Fair Housing Choice, the barriers identified in 2019 provided the City a path forward in furthering fair housing protections in the jurisdiction. Assessing the status of these actions helps to inform the current trends that may continue to

limit fair housing choice in Cleveland. The following are detailed descriptions of the impediments as presented in the 2019 Analysis of Impediments assessment:

IMPEDIMENT	DESCRIPTION AND ACTIONS UNDERTAKEN
Lack of public awareness of fair housing laws.	**Description:** 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. Disbursal of information about fair housing initiatives uses sophisticated language which is not easily understood by a larger demographic. The information has to be visible using mainstream methods so that it reaches a larger population. A few comments in the survey mentioned that notices are put in obscure places and are difficult to spot. **Actions Undertaken:** • The city can review HUD's Fair Housing/Equal Opportunity website for public awareness options which can be further customized for Cleveland. • The city may work with public and private sector partners to disseminate information to their customers, tenants, and clients, especially in the CDBG target area. An example would be to work with the school system to disseminate information to families about fair housing laws and complaint procedures. The city can use grocery stores, and gas stations to distribute pamphlets that inform residents about Fair housing laws. Social media is another pertinent strategy that can aid in disseminating information. • The city can create a task force that comprises of city officials, financial institutions, real estate professionals, nonprofits, and citizens to address impediments and implement strategies.
Southside of Cleveland is currently concentrated with low-income households and affordable housing developments.	**Description:** Low-income families do not have a choice in where they reside due to the concentration of affordable housing on the Southside of Cleveland. **Actions Undertaken:** • The City can update its zoning code to reflect its desire to incentivize builders who build affordable units. Zoning codes can be revised to include provisions that can allow for heterogeneity in housing options. It can be achieved through density changes and land use revisions. Allowing for incentives to builders who accommodate a diverse range of housing options that caters to mixed income households. These incentives could be in the form of extra built out area or extra building height allowing such that it maximizes profit.

	• Comprehensive planning efforts are required to promote wholistic development that comprises of planning for transportation, retail, education, recreation, and healthcare along with housing. • The city should work with non-profit and for-profit developers to discuss strategies that create housing opportunities in areas outside of South Cleveland. Efforts should be made to increase affordable housing outside of Census Tracts 103, 104, 107, and 108. • The city should work with regional housing developers, nonprofits and neighborhood associations to increase affordable housing projects.
Mortgage lending practices are to be addressed since there were high denial rates among certain races.	**Description:** HMDA data revealed that most denials were with African American and Hispanic households for minority races. Native American applications were few in number, however it is significant because 3 out of 5 loans were denied. The Hispanic population is the second highest population and had the second highest denial rate too. **Actions Undertaken:** • Creating more employment opportunities and helping unemployed householders by providing adequate training and skill development will improve their financial stability. • A comprehensive plan that looks into population projections and demographic trends can help the city plan better and devise strategies that attract economic development and increase financial prosperity. The city can work proactively with financial institutions and banks to allow for more flexibility in payments and assist with background checks by reducing liability or providing assistance.
Limited English Proficiency is lacking with city's website and systems for disseminating information.	**Description:** Following the recommendations from previous A.I. the city has updated its website to include Spanish. However, additional translation services for documents, mail-outs, website, and other pertinent information may be needed in languages other than English. There are other large race populations that may require information to be disseminated in languages other than English and should be accommodated accordingly. **Actions Undertaken:** • For greater awareness for all its citizens and to include them in planning and development efforts, the city may work with local minority groups and any groups with limited English proficiency. • Neighborhood Associations can be a vital resource in creating citizen leaders that are capable of interpreting information for racial or ethnical groups prevalent in their area.

	• The city can have a resource available for translation services or a contact for dissemination of materials in languages other than Spanish. • Public meetings can have translators or city staff capable of speaking and interpreting languages other than English.
Lack of landlord/tenant coordination and information.	**Description:** Often tenants living in low-income units need the shelter and are afraid of eviction acts by landlords. These landlord/tenant issues are often the reason that discrimination complaints are not filed. Tenants should be aware of their rights to ensure that fairness in housing policies can be achieved. Additionally, landlords are not always familiar with the landlord/tenant act or fair housing laws. **Actions Undertaken:** • The city can disseminate fair housing information to landlords as often as possible. • Trainings can be provided at least once a year for both the Landlord Tenant Act and fair housing laws. If regional efforts are in place for training, then city can devise a strategy to convey this information to landlords. • The city can create a registry or database listing landlords or repeat code offenders and create an enforcement remedy.
Homogeneity in housing stock	**Description:** Approximately 61% of the housing units in the city are 1-unit detached structures. While people seeking affordable housing have varied household types which reflects the need of market driven planning and design. **Actions Undertaken:** • The city's efforts for housing rehabilitation and housing modules should reflect sensitivity to its population trends and income projections. • While housing modules should accommodate a larger variety of housing, it should also be geared towards people with disabilities and the elderly. • Building code, building review and permitting process can include rules about accessibility so that all public and private buildings have to comply with regulations at entry, exits, corridor widths, and washrooms. Stricter rules and permitting process can be made applicable to housing projects in low-income areas. • Location and site selection of new housing projects should be carefully planned such that it assists in linking employment-housing-transportation-retail-healthcare.

Table 15: Source: Cleveland, TN 2019 Analysis of Impediments, https://clevelandtn.gov/694/Analysis-of-Impediments

VI. IMPEDIMENTS TO FAIR HOUSING CHOICE

The following are the identified impediments based on the assessment conducted throughout the 2024 Analysis of Impediments to Fair Housing Choice process. The new identified impediments to fair housing access and choice represent ongoing issues in Cleveland, TN. Of the previously identified impediments, a lack of public awareness of fair housing laws, concentration of low-income housing, mortgage lending practices and denial rates among certain races, lack of landlord tenant coordination and limited public transportation are still present in the City and will continue to be addressed. Below is a list of impediments:

Impediment 1: Discrimination in the rental market based on source of income.

Renters who receive a verifiable source of legal income, such as social security, child support, SSI and Section 8 vouchers can still face legal discrimination in the City.

Recommendation:

- Testing to determine the severity of the issue.
- Support the adoption of source of income as a citywide protected basis.
- Support legislation to prevent landlords from categorically denying housing to tenants whose sources of income include a housing subsidy or other sources of legitimate income, as other cities have done. Keeping in mind that landlords could still reject tenants who do not have adequate income and resources to meet the monthly rental payments, and could still deny tenancy on legal standards that are equally applied to all applicants.

Impediment 2: The expense of tenant screening reports for low-income renters.

According to recent research, the average renter will have to pay for three or more tenant screening reports when they are trying to find new housing. These screening fees can be a barrier to moving into stable housing, especially for families on limited incomes, already faced with the costs of a deposit and first month's rent.

Recommendation:

- Adopt statutory changes to consolidate tenant screening reports. Establish a process by which tenants will be able to buy just one report that can be provided to all prospective landlords requesting the data, to make the tenant screening process more affordable and fairer for both tenants and landlords.

Impediment 3: Housing Affordability/Cost Burden

High rents in relationship to the earnings of average workers put housing affordability out of the reach for many. Housing is the largest monthly cost for most households. Owners and renters

with a severe cost burden are at risk of homelessness. Cost-burdened households that experience a financial setback often must choose between rent and food or rent and health care for their families or face eviction or foreclosure.

Recommendations:

- Leverage Tenant Based Rental Assistance as an interim solution for housing affordability.
- Explore re-purposing of existing real estate to include strip malls and extended stay hotels into rental units, including single room occupancy (SRO) options.
- Provide tax incentives for apartment owners or owners of secondary residential properties who are willing to set aside a certain number of their existing apartments / homes as affordable housing.
- Encourage more private sector investment in existing affordable housing properties to supplement federally funded efforts.
- Develop Economic Development activities that will provide opportunities for small businesses to grow their customer base in their pursuit of sustainability.

Impediment 4: Deficiency of Fair Housing Education

As the City continues to expand with an increasingly diverse population, fair housing education must be continuous and presented in a context that is relative to the current community concerns.

Recommendations:

- Fund and promote Fair Housing Education and Housing Counseling activities with CDBG Public Service funds.
- Develop a Fair Housing Education Campaign to increase public awareness of fair housing rights.
- Seek public and private partners to disseminate fair housing information to residents.

Impediment 5: Mortgage Lending Practices

As the City continues to expand with an increasingly diverse population, addressing the needs of the City's most vulnerable residents is a priority. HMDA data revealed that most denials were with non-white borrowers and minority households.

Recommendations:

- Testing to determine the severity of the issue.
- Creating more employment opportunities and helping unemployed householders by providing adequate training and skill development will improve their financial stability.

- A comprehensive plan that looks into population projections and demographic trends can help the city plan better and devise strategies that attract economic development and increase financial prosperity.
- The city can work proactively with financial institutions and banks to allow for more flexibility in payments and assist with background checks by reducing liability or providing assistance.

VII. CONCLUSION

Through this Analysis of Impediments to Fair Housing Choice, several barriers have been identified that restrict the housing choice available to residents of Cleveland. These barriers may prevent residents from realizing their right to fair and equitable treatment under the law. It is imperative that residents know their rights and that those providing housing or related services know their responsibilities. The City will work diligently toward achieving fair housing choice for its residents using the recommendations provided here to address the identified impediments. However, it should be noted that these impediments are largely systemic and will require effort from both private sector and public sector actors to correct. The City has an important role to play but cannot on its own bring about the change necessary to remove these impediments to fair housing choice.

The recommendations proposed in this document address impediments relative to the need for fair housing education, the age of housing stock, unequal distribution of resources, disparities in lending practices, and location of affordable housing. Implementation of the recommendations can assist the city in achieving the reality of an open and inclusive region that truly embraces fair housing choice for all its residents.

PUBLIC NOTICE FOR NEEDS ASSESSMENT

TU ENTRADA ES NECESARIO!

¡COMPLETA EL QUESTIONARIO O ASISTIR A UNA REUNIÓN!

ESCANEA AQUÍ 👉

HAGA CLIC O COPIE EL ENLACE A CONTINUACIÓN

https://www.surveymonkey.com/r/ClevelandNecesidades

¡ASISTIR A UNA REUNIÓN!

FEB 1 @ 2:00
OR
FEB 1 @ 5:00

City of Cleveland
Municipal Building
City Council Room
190 Church Street, NE
Cleveland, TN 37364.

La Ciudad de Cleveland, Tennesee está llevando a cabo una Evaluación de Necesidades para informar las prioridades del próximo Plan Consolidado de 5 Años y Análisis de los impedimentos para la elección de vivienda justa.

El Plan Consolidado identifica las necesidades generales de la comunidad y proporciona una estrategia de cinco años sobre cómo se utilizarán los fondos de subvención de HUD para desarrollar recursos comunitarios que satisfagan esas necesidades.

📍 185 2nd NE, Cleveland, TN, 37311
📞 423.457.9562
✉ candrews@clevelandtn.gov

CLEVELAND
TENNESSEE
EST. 1842

HUD FHEO COMPLAINT DATA

Housing Discrimination Complaints in Cleveland, TN
January 1, 2019 through December 31, 2023

Case Number - HUD	HUD/ FHAP	Violation City	Violation County	Violation State	Filing Date	Closure Date	Bases	Issues	Case Disposition	All Compensation and Victims Fund Amount
04-19-5465-8	FHAP	Cleveland	Bradley	Tennessee	01/28/19	06/18/19	Race	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	No cause determination	$0
04-19-7638-8	FHAP	Cleveland	Hamilton	Tennessee	07/01/19		Disability, Retaliation	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation		$0
04-19-8055-8	FHAP	Cleveland	Hamilton	Tennessee	08/01/19		Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation		$0
04-20-0306-8	FHAP	Cleveland	Bradley	Tennessee	01/17/20	04/20/21	Disability, Retaliation	False denial or representation of availability - rental; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	$0
04-20-1151-8	FHAP	Cleveland	Bradley	Tennessee	03/23/20	01/05/21	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	No cause determination	$0
04-20-1691-8	FHAP	Cleveland	Bradley	Tennessee	05/06/20	07/29/20	Race, Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	$5,500
04-20-9030-8	FHAP	Cleveland	Hamilton	Tennessee	10/08/19	01/17/20	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	Complainant failed to cooperate	$0

Page 1 of 4

Housing Discrimination Complaints in Cleveland, TN
January 1, 2019 through December 31, 2023

Case Number - HUD	HUD/ FHAP	Violation City	Violation County	Violation State	Filing Date	Closure Date	Bases	Issues	Case Disposition	All Compensation and Victims Fund Amount
04-21-4054-8	HUD	Cleveland	Hamilton	Tennessee	10/27/20	07/06/21	Race, Sex, Retaliation	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	Complaint withdrawn by complainant after resolution	$3,250
04-21-4460-8	FHAP	Cleveland	Hamilton	Tennessee	12/02/20	02/09/21	Sex, Retaliation	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	$1,500
04-21-4698-8	HUD	Cleveland	Hamilton	Tennessee	12/17/20	09/02/21	Sex	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	$0
04-21-5030-8	HUD	Cleveland	Bradley	Tennessee	01/13/21		Race, Sex	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)		$0
04-21-5178-8	FHAP	Cleveland	Hamilton	Tennessee	01/25/21	02/25/21	Disability	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	$0
04-21-5277-8	FHAP	Cleveland	Bradley	Tennessee	02/01/21	05/11/21	Race, Sex	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	Complaint withdrawn by complainant after resolution	$0

Housing Discrimination Complaints in Cleveland, TN
January 1, 2019 through December 31, 2023

Case Number - HUD	HUD/ FHAP	Violation City	Violation County	Violation State	Filing Date	Closure Date	Bases	Issues	Case Disposition	All Compensation and Victims Fund Amount
04-21-5369-8	FHAP	Cleveland	Hamilton	Tennessee	02/10/21	03/15/21	Sex	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	Conciliation/settleme nt successful	$1,002
04-21-5676-8	FHAP	Cleveland	Bradley	Tennessee	03/01/21	04/21/23	Race, Disability	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	No cause determination	$0
04-21-6055-8	FHAP	Cleveland	Bradley	Tennessee	03/30/21	08/29/22	Disability	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	$0
04-22-2001-8	FHAP	Cleveland	Bradley	Tennessee	07/11/22		National Origin	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable		$0
04-22-3091-8	FHAP	Cleveland	Bradley	Tennessee	09/27/22	11/01/22	Race	Discriminatory refusal to sell and negotiate for sale; Discrimination in terms/conditions/privileges relating to sale; Discrimination in services and facilities relating to sale; Otherwise deny or make housing unavailable	Complaint withdrawn by complainant without resolution	$0
04-22-9472-8	FHAP	Cleveland	Bradley	Tennessee	12/22/21	12/21/22	Disability	Discriminatory refusal to rent; Discrimination in services and facilities relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settleme nt successful	$0

Housing Discrimination Complaints in Cleveland, TN
January 1, 2019 through December 31, 2023

Case Number - HUD	HUD/ FHAP	Violation City	Violation County	Violation State	Filing Date	Closure Date	Bases	Issues	Case Disposition	All Compensation and Victims Fund Amount
04-23-3970-8	FHAP	Cleveland	Bradley	Tennessee	12/02/22		Religion, Disability, Retaliation	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation		$0
04-23-4249-8	FHAP	Cleveland	Bradley	Tennessee	01/19/23	04/24/23	Race	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	No cause determination	$0

FAIR HOUSING SURVEY & RESULTS