



**2016 Analysis of Impediments
to Fair Housing Choice**
Sponsored by the City of Grants Pass

Fair Housing Forum



Fair Housing Forum

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August 22, 2016



**2016 City of Grants Pass
Analysis of Impediments (AI)**



Entitlements must:
**Certify that they are Affirmatively
Furthering Fair Housing (AFFH)
as a condition of receiving
federal funds from HUD**

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**2016 City of Grants Pass
Analysis of Impediments (AI)**



Certification means three things:

- 1. Conduct an AI**
- 2. Take action on impediments, if impediments were found**
- 3. Maintain records of actions**

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**2016 City of Grants Pass
Analysis of Impediments (AI)**



Entire purpose of the Study:

Conduct study to identify any impediments to fair housing choice, then recommend actions that address impediments

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Content of an AI



- **Private sector transactions: rental market (applications, interviews, etc.) and sales markets (lending, steering, blockbusting, foreclosure burden, etc.)**
- **Public sector influences: land use codes, zoning, public policy practices, neighborhood resistance, etc.**
- **Assessing barriers to housing choice**

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City of Grants Pass Fair Housing Forum



Present to you context, fair housing information, and preliminary results of analysis

Receive comment, input, and your experiences with fair housing

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**Definition of Impediments to
Fair Housing Choice:**

**Actions, omissions, or decisions
which restrict housing choice
because of protected class
status**



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Who is protected?

**Protected classes
under federal and state law:**

**Race, color, religion, national origin, sex,
disability, familial status, legal sources
of income, domestic violence
survivors, marital status, sexual
orientation, and gender identity**



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Review AFFH Court Cases



National Significance:

- *Westchester County, NY vs. Antidiscrimination Center of New York City*
 - ✓ Falsely claiming certification
 - ✓ Forced to pay funding back to HUD
 - ✓ Forced to pay legal fees
 - ✓ That County now has very close oversight
 - ✓ AI scrutiny very high throughout the U.S.

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Review AFFH Evolution



Key Points In Time:

- GAO report castigating HUD - 2010
- Proposed Rule for AFFH - 2013
 - ✓ Inclusive neighborhoods
 - ✓ Reduce highly concentrated poverty
 - ✓ Increase access to community assets
 - ✓ Reduce disproportionate share for minorities
- Final Rule Published - July 8, 2015

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Review AFFH Evolution

The AFFH Final Rule:

- **Changes to existing policy**
 - ✓ Replaces the AI with an Assessment of Fair Housing (AFH)
 - ✓ AFH must be submitted/approved in advance of the Consolidated Plan
 - ✓ New format and nationally standard data
- **Phased in approach starting this year (first entitlements, followed by states/territories)**

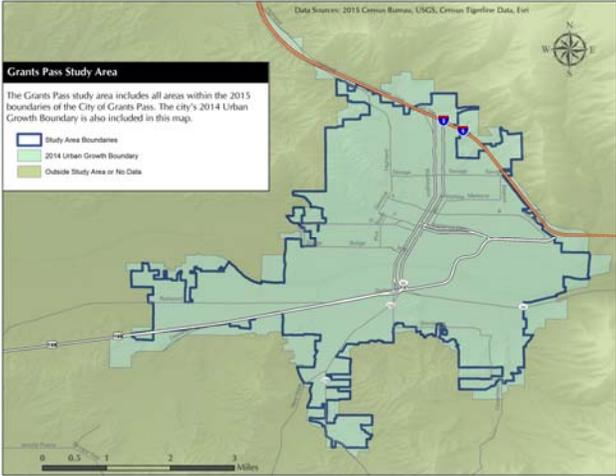


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2016 AI Study Area

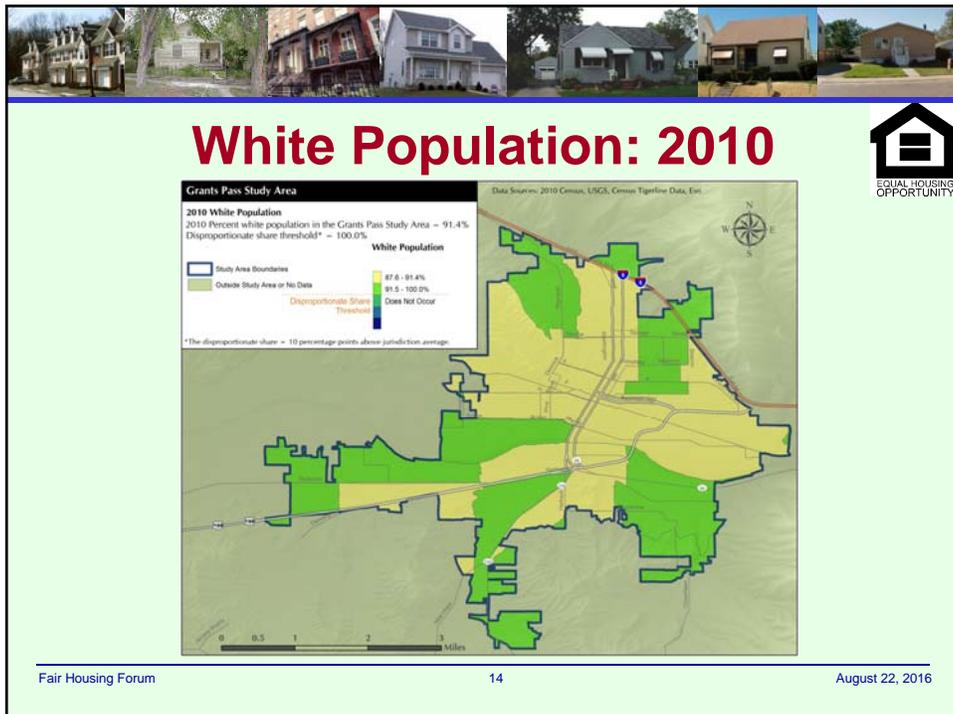
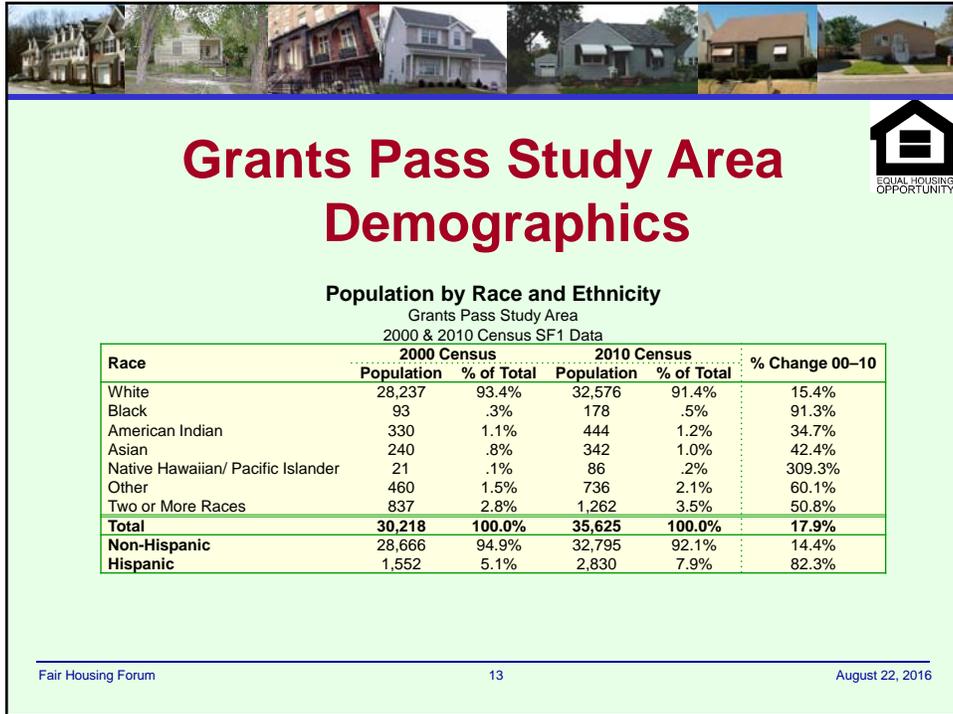


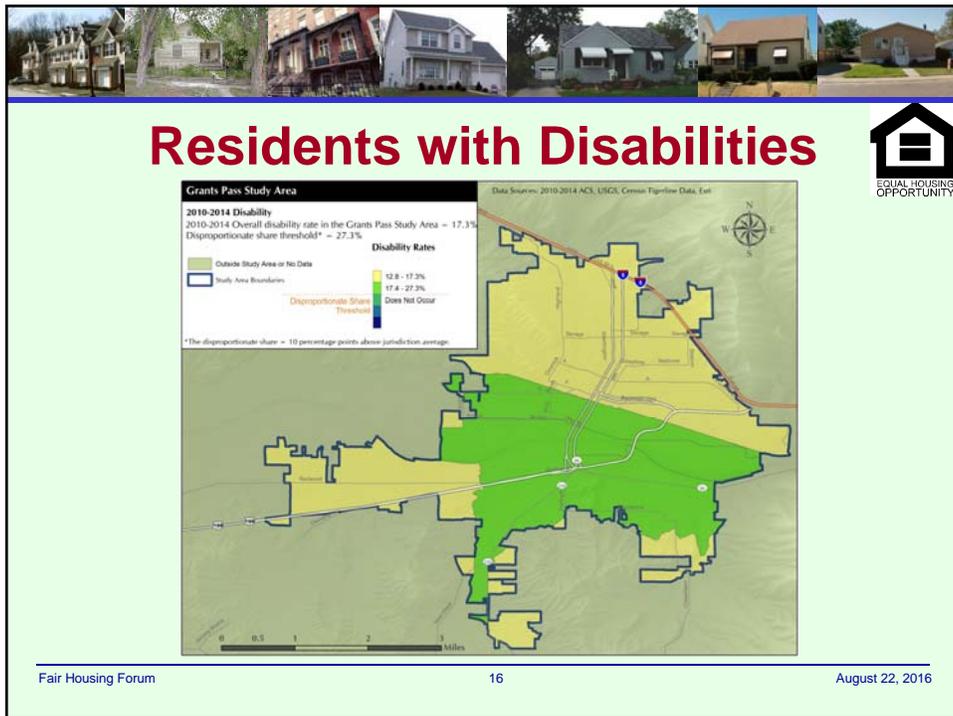


Grants Pass Study Area
The Grants Pass study area includes all areas within the 2015 boundaries of the City of Grants Pass. The city's 2014 Urban Growth Boundary is also included in this map.

- Study Area Boundaries
- 2014 Urban Growth Boundary
- Outside Study Area or No Data

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Grants Pass Study Area Economics

Poverty in the Grants Pass Study Area

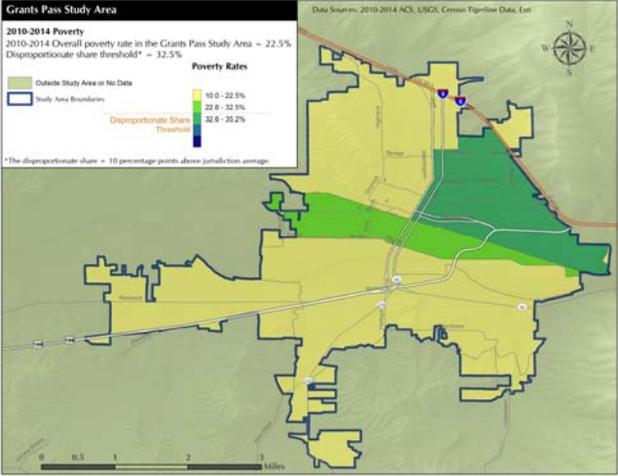
Poverty by Age
Grants Pass Study Area
2000 Census SF3 & 2014 Five-Year ACS Data

Age	2000 Census		2014 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	640	14.6%	1,083	13.6%
6 to 17	977	22.2%	1,561	19.6%
18 to 64	2,363	53.7%	4,509	56.7%
65 or Older	418	9.5%	797	10.0%
Total	4,398	100.0%	7,950	100.0%
Poverty Rate	14.9%		22.5%	

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Poverty: 2010-2014



Grants Pass Study Area
2010-2014 Poverty
2010-2014 Overall poverty rate in the Grants Pass Study Area = 22.5%
Disproportionate share threshold* = 32.5%

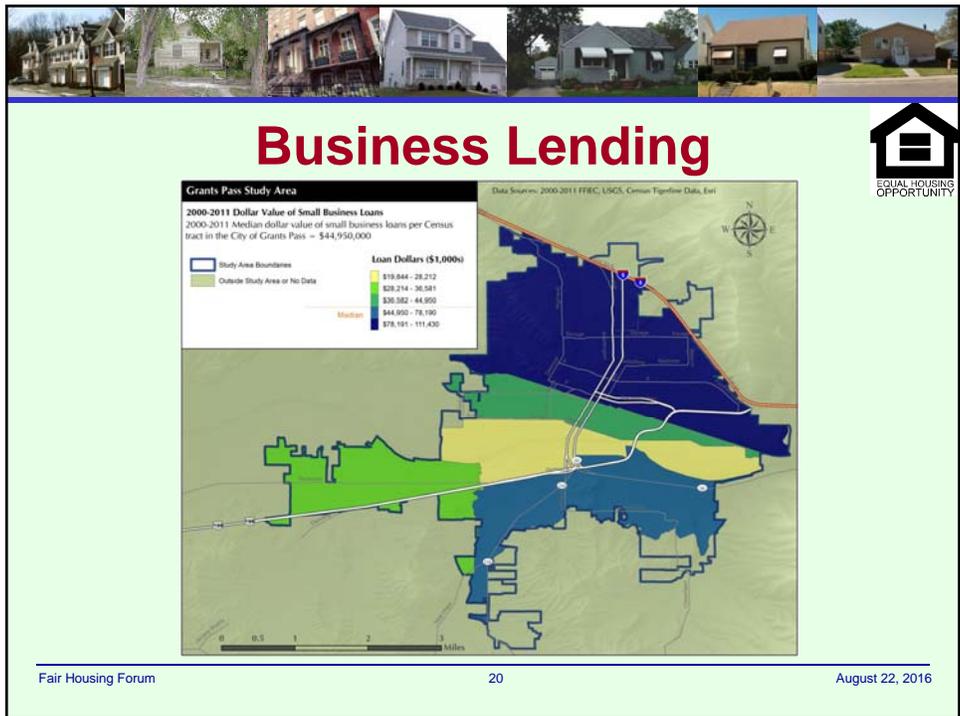
Poverty Rates

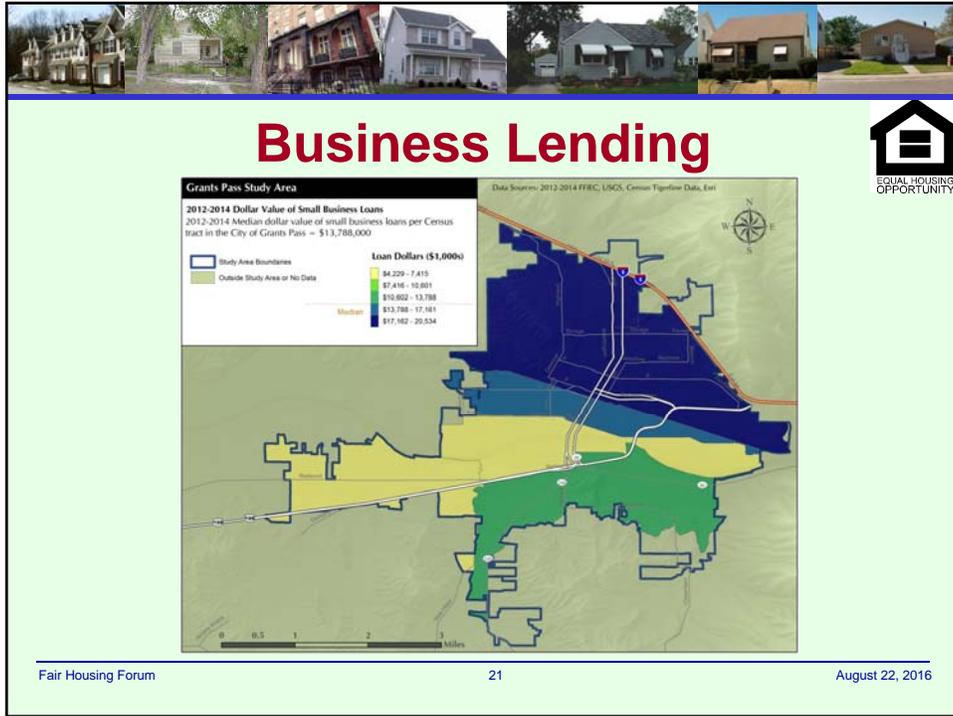
- 10.0 - 22.5%
- 22.6 - 32.5%
- 32.6 - 38.2%

Disproportionate Share Threshold

*The disproportionate share = 10 percentage points above jurisdiction average.

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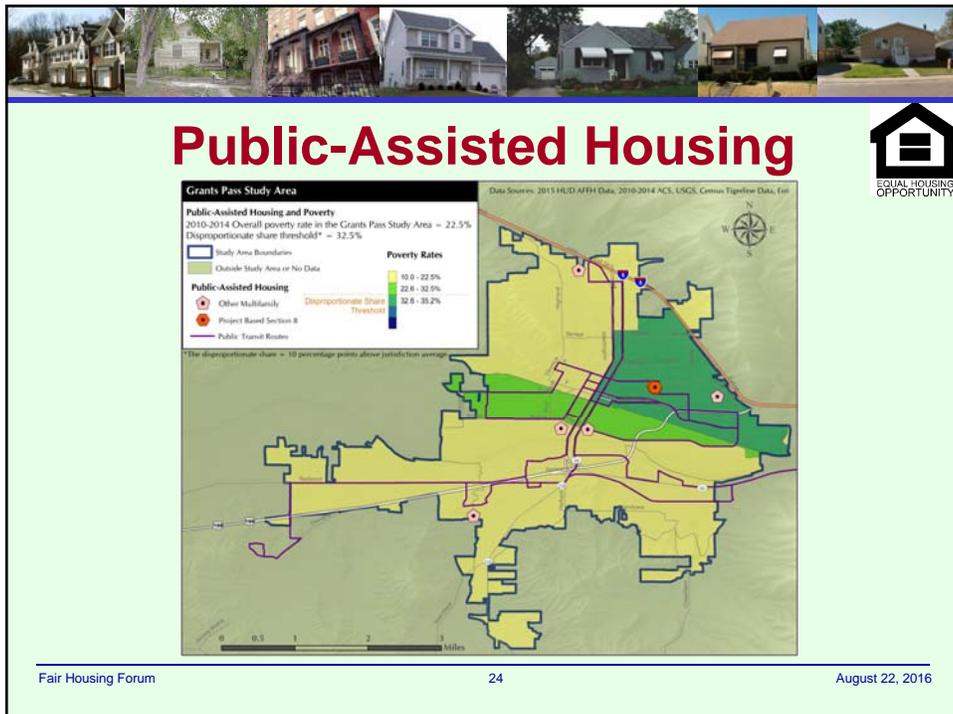
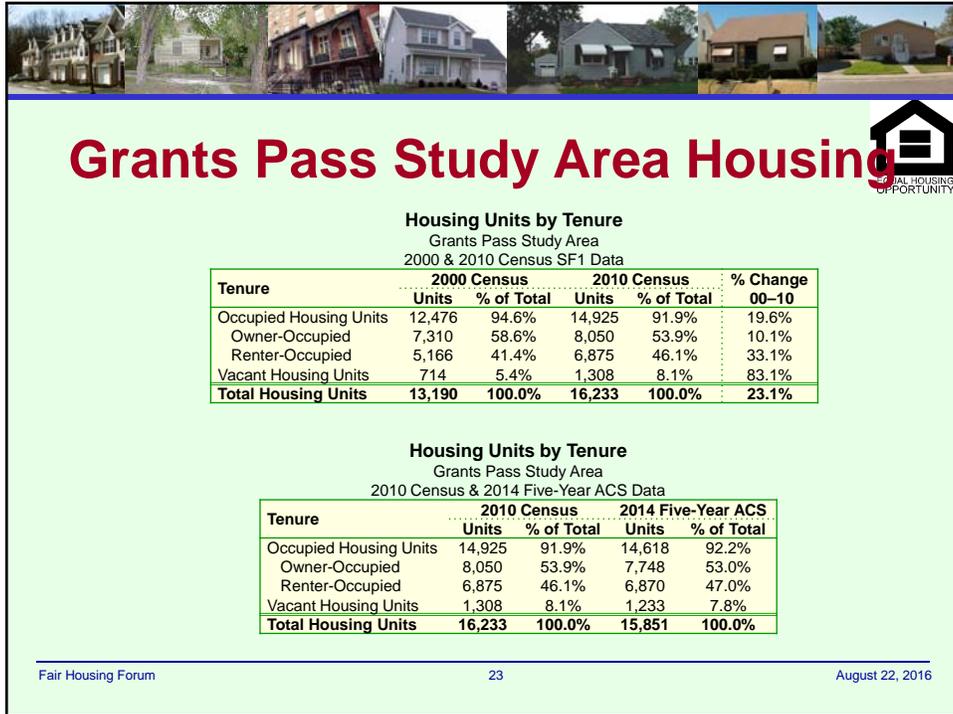


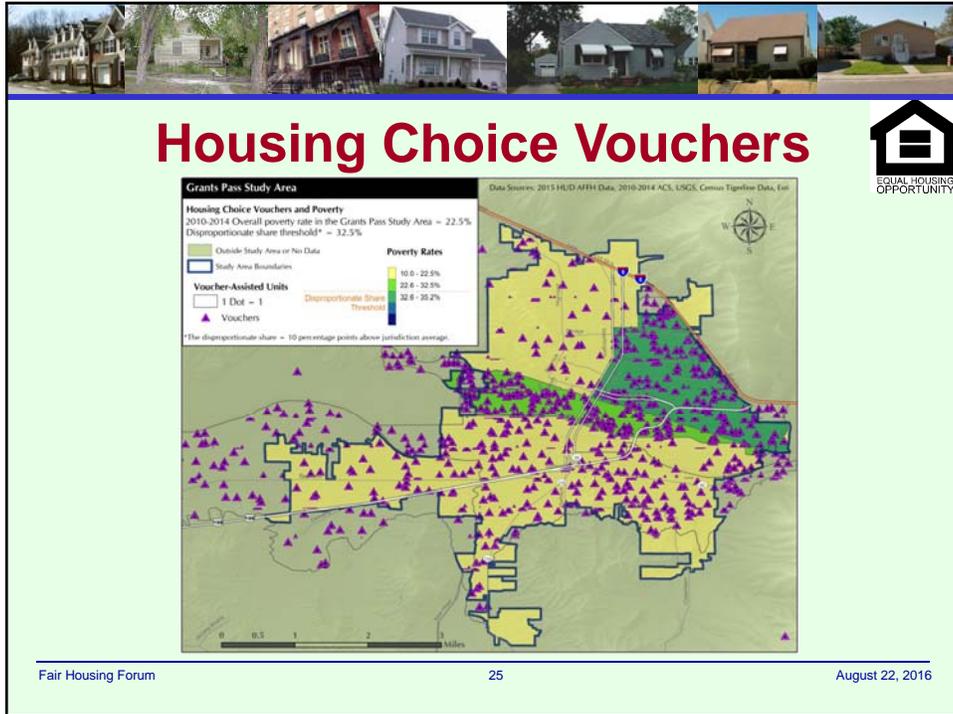
Grants Pass Study Area Housing

Housing Units by Type
 Grants Pass Study Area
 2000 Census SF3 & 2014 Five-Year ACS Data

Unit Type	2000 Census		2014 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	9,008	68.3%	11,014	69.5%
Duplex	805	6.1%	1,015	6.4%
Tri- or Four-Plex	690	5.2%	618	3.9%
Apartment	1,274	9.7%	1,879	11.9%
Mobile Home	1,359	10.3%	1,222	7.7%
Boat, RV, Van, Etc.	55	.4%	102	0.6%
Total	13,190	100.0%	15,851	100.0%

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Home Lending

Purpose of Loan by Year
Grants Pass Study Area
2008-2014 HMDA Data

Purpose	2008	2009	2010	2011	2012	2013	2014	Total
Home Purchase	670	669	545	546	720	688	740	4,578
Home Improvement	111	65	38	43	81	68	53	459
Refinancing	1,045	1,365	976	804	1,388	1,105	541	7,224
Total	1,826	2,099	1,559	1,393	2,189	1,861	1,334	12,261

Occupancy Status for Home Purchase Loan Applications
Grants Pass Study Area
2008-2014 HMDA Data

Status	2008	2009	2010	2011	2012	2013	2014	Total
Owner-Occupied	541	596	461	452	618	576	629	3,873
Not Owner-Occupied	117	66	77	91	99	107	109	666
Not Applicable	12	7	7	3	3	5	2	39
Total	670	669	545	546	720	688	740	4,578

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Home Lending



Action	2008	2009	2010	2011	2012	2013	2014	Total
Loan Originated	244	254	212	210	302	309	374	1,905
Application Approved but not Accepted	27	30	19	18	19	20	23	156
Application Denied	71	64	28	41	41	59	71	375
Application Withdrawn by Applicant	45	35	33	40	56	47	68	324
File Closed for Incompleteness	11	6	5	5	10	4	6	47
Loan Purchased by the Institution	143	207	164	138	190	137	87	1,066
Preapproval Request Denied	0	0	0	0	0	0	0	0
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0
Total	541	596	461	452	618	576	629	3,873
Denial Rate	22.5%	20.1%	11.7%	16.3%	12.0%	16.0%	16.0%	16.4%

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Home Lending



Race	2008	2009	2010	2011	2012	2013	2014	Total
American Indian	0.0%	0.0%	0.0%	33.3%	50.0%	0.0%	.	16.7%
Asian	33.3%	0.0%	50.0%	40.0%	0.0%	33.3%	28.6%	31.0%
Black	.	.	0.0%	.	.	.	0.0%	0.0%
White	22.4%	20.5%	10.7%	15.2%	11.0%	15.6%	15.7%	15.9%
Not Available	22.2%	19.4%	25.0%	23.1%	28.6%	23.8%	17.4%	21.8%
Not Applicable	22.2%	19.4%	25.0%	23.1%	28.6%	23.8%	17.4%	0.0%
Total	22.5%	20.1%	11.7%	16.3%	12.0%	16.0%	16.0%	16.4%
Non-Hispanic	21.3%	20.6%	11.0%	16.2%	10.5%	14.9%	15.7%	15.8%
Hispanic	50.0%	.0%	8.3%	.0%	23.1%	20.0%	14.3%	18.1%

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Fair Housing Complaints



- Have submitted a request for data
 - HUD and Fair Housing Council
- Still awaiting those data
- In the meantime, we can consult data from a previous study

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HUD Complaints



Fair Housing Complaints by Basis of Complaint
Josephine County
HUD Data: 2004 – 2009

Basis	2004	2005	2006	2007	2008	2009	Total
Disability	.	.	.	4	1	1	6
Harassment	1	1	.	1	.	.	3
Sex	.	.	.	1	.	.	1
Familial Status	1	1
Religion	.	1	1
Total Basis	1	2	.	6	1	2	12
Total Complaints*	2	3	.	7	1	3	16

* “Basis” data missing from some complaints

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HUD Complaints



Fair Housing Complaints by Issue of Complaint
Josephine County
HUD Data, 2004 – 2009

Issue	2004	2005	2006	2007	2008	2009	Total
Other non-compliance with design and construction requirements	.	.	.	3	.	.	3
Discriminatory refusal to rent	.	1	.	1	.	1	3
Discriminatory acts under Section 818 (coercion, Etc.)	1	1	.	1	.	.	3
Failure to make reasonable accommodation	.	.	.	1	1	1	3
Discrimination in terms/conditions/privileges relating to rental	.	1	.	1	.	.	2
Discriminatory terms, conditions, privileges, or services and facilities	1	1	2
Total Issue	2	3	.	7	1	3	16
Total Complaints*	2	3	.	7	1	3	16

* “Issue” data missing from some complaints

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HUD Complaints



Fair Housing Complaints by Outcome
Josephine County
HUD Data: 2004 – 2009

Closure Type	2004	2005	2006	2007	2008	2009	Total
No cause determination	1	1	.	4	1	.	7
Complainant failed to cooperate	.	.	.	1	.	1	2
Complaint withdrawn by complainant after resolution	1	1
Total	2	3	.	7	1	3	16

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Bureau of Labor and Industries Complaints



Fair Housing Complaints by Basis of Complaint
Josephine County
Oregon Bureau of Labor & Industries Data, 2005 – 2009

Basis	2005	2006	2007	2008	2009	Total
Disability	.	.	.	1	1	2
Religion	.	2	.	.	.	2
Familial Status	1	1
Marital Status	.	1	.	.	.	1
Retaliation	1	1
Total Basis	.	3	.	1	3	7
Total Complaints	.	1	.	1	2	4

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Fair Housing Council Complaints



Basis of Complaint by Year in the Non-Entitlement Areas of Oregon
Josephine County
Fair Housing Council of Oregon Complaint Data

Basis	2004	2005	2006	2007	2008	2009	Total
Disability	1	3	1	.	.	.	5
Familial Status	1	.	.	.	1	.	2
Marital Status	.	2	2
Race	1	1
Religion	.	1	1
Sex	1	1
Income Sources	1	1
Total	5	6	1	.	1	.	13

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Fair Housing Council Complaints

Issue of Complaint by Year in the Non-Entitlement Areas of Oregon
Josephine County
Fair Housing Counsel of Oregon Complaint Data

Issue	2004	2005	2006	2007	2008	2009	Total
Refusal to rent	2	2	.	.	1	.	5
Reasonable accommodation	1	2	3
Harassment	1	.	1	.	.	.	2
Eviction	1	1
Illegal ad/statement	.	1	1
Terms & Conditions	.	1	1
Total Issues	5	6	1	.	1	.	13
Total Complaints	5	6	1	.	1	.	13

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Grants Pass Study Area 2016 Fair Housing Survey

**Please take the
2016 Grants Pass Fair Housing Survey:**

<https://www.research.net/r/2016GrantsPassFairHousingSurvey>

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Grants Pass Study Area 2016 Fair Housing Survey



Role of Respondent
City of Grants Pass
2016 Fair Housing Survey Data

Primary Role	Total
Advocate/Service Provider	10
Local Government	6
Property Management	5
Law/Legal Services	4
Service Provider	3
Other Role	12
Missing	49
Total	89

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Grants Pass Study Area 2016 Fair Housing Survey



Barriers to Fair Housing in the Private Sector
City of Grants Pass
2016 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	16	23	25	25	89
The real estate industry?	5	22	37	25	89
The mortgage and home lending industry?	2	23	39	25	89
The housing construction or accessible housing design fields?	6	24	34	25	89
The home insurance industry?	1	26	36	26	89
The home appraisal industry?	1	23	40	25	89
Any other housing services?	6	21	36	26	89

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Grants Pass Study Area 2016 Fair Housing Survey



Barriers to Fair Housing in the Public Sector City of Grants Pass 2016 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
Land use policies?	8	24	25	32	89
Zoning laws?	7	19	31	32	89
Occupancy standards or health and safety codes?	5	26	25	33	89
Property tax policies?	3	21	32	33	89
Permitting process?	4	20	31	34	89
Housing construction standards?	1	22	33	33	89
Neighborhood or community development policies?	4	23	29	33	89
Limited access to government services, such as employment services?	15	29	12	33	89
Public administrative actions or regulations?	5	19	33	32	89

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2016 Fair Housing Survey



Comments Expressed:

- **Lack of affordable housing**
- **Discrimination in rental market**
- **Tight Rental Market**
- **Difficulty Siting Affordable Housing Developments**

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2016 Analysis of Impediments

Preliminary Impediments:

- **Difficulty siting affordable units, NIMBYism?**
- **Refusal to make reasonable accommodation/modification**
- **Discriminatory actions in rental market**
- **Challenges for Hispanic home buyers**

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2016 Analysis of Impediments

Questions to Consider:

- **Are there other fair housing issues or impediments have you noticed?**
- **Any other observations, comments, or concerns?**
- **What can we do about our fair housing challenges?**

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Conclusion



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