2014 Analysis of Impediments to Fair Housing Choice

Final Report

City of Oklahoma City

January 26, 2015

SEAL OF THE CITY OF OKLAHOMA CITY

EQUAL HOUSING OPPORTUNITY

2014 City of Oklahoma City
Analysis of Impediments to Fair Housing Choice:

Prepared for the:
City of Oklahoma City

Prepared by:
Western Economic Services, LLC
212 SE 18th Avenue
Portland, OR 97214
Phone: (503) 239-9091
Toll Free: (866) 937-9437
Fax: (503) 239-0236

Website: http://www.westernes.com

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HAS YOUR RIGHT TO FAIR HOUSING BEEN VIOLATED?

If you feel you have experienced discrimination in the housing industry, please contact:

Office of Fair Housing and Equal Opportunity
Department of Housing and Urban Development
451 Seventh Street SW, Room 5204
Washington, DC 20410-2000
Telephone: (202) 708-1112
Toll Free: (800) 669-9777
Web Site: http://www.HUD.gov/offices/fheo/online-complaint.cfm

Oklahoma Attorney General's Office
Office of Civil Rights Enforcement
907 S. Detroit, Suite 750
Tulsa, OK 74120
Telephone: (918) 581-2201
Website: http://www.ok.gov/oag/About_the_Office/OCRE.html
Complaint Form Available From (PDF): http://www.ok.gov/oag/documents/OCRE%20-%20Housing%20Discrimination%20Form%20fillable.pdf

Oklahoma City Municipal Counselor
Kenneth D. Jordan
200 N. Walker
Oklahoma City, Oklahoma 73102
Telephone: (405) 297-2451

Metropolitan Fair Housing Council of Oklahoma, Inc.
1500 Northeast 4th Street, Suite 204
Oklahoma City, Oklahoma 73117
Telephone (Local): (405) 232-3247
Telephone (Toll Free): 1 (866) 677-7541

Legal Aid Services of Oklahoma, Inc.
2915 North Classen Boulevard, Suite 500
Oklahoma City, Oklahoma 73106
Telephone (Local): (405) 557-0020

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EXECUTIVE SUMMARY

AI PURPOSE AND PROCESS

As a requirement of receiving funds under the Community Development Block Grant (CDBG), the HOME Investment Partnerships (HOME), and the Emergency Solutions Grant (ESG), entitlement jurisdictions must submit certification of affirmatively furthering fair housing to the U.S. Department of Housing and Urban Development (HUD). This certification has three elements:

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.

In the *Fair Housing Planning Guide*, page 2-8, HUD provides a definition of impediments to fair housing choice as:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices [and]
- Any actions, omissions, or decisions which have [this] effect.[1]

The list of protected classes included in the above definition is drawn from the federal Fair Housing Act, which was first enacted in 1968. However, state and local governments may enact fair housing laws that extend protection to other groups, and the AI is expected to address housing choice for these additional protected classes as well.

The AI process affirmatively furthers fair housing involves a thorough examination of a variety of sources related to housing, the fair housing delivery system, and housing transactions, particularly for persons who are protected under fair housing law.

The development of an AI also includes public input and review via direct contact with stakeholders, public meetings to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and impediments, along with actions to overcome the identified impediments.

METHODOLOGY

As part of the consolidated planning process, and as a requirement for receiving HUD formula grant funding, the City of Oklahoma City is undertaking this AI to evaluate impediments to fair housing choice within the city.

Residents of the City of Oklahoma City are protected from discrimination in housing choice by the federal Fair Housing Act, which includes protections based on race, color, religion,

[1] U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide*. Vol. 1, p. 2-8. http://www.hud.gov/offices/cpd/about/conplan/fairhousingexs/Module5_TopSevenAFFH.pdf

national origin, sex, disability, and familial status[2]. City residents are protected by additional statutes at the state level, which extend prohibitions against discrimination on the basis of age[3]; as well as a local anti-discrimination statute that extends protections based on creed and ancestry[4], though it includes no protections based on disability, familial status, or age.

The purpose of this report is to determine current impediments to fair housing choice at work in City of Oklahoma City and to suggest actions that the local community can consider in order to overcome the identified impediments. Thus, this report represents only the first step in the three-part certification process presented on the previous page.

This AI was conducted through the assessment of a number of quantitative and qualitative sources. Quantitative sources used in analyzing fair housing choice in the City of Oklahoma City included:

- Socio-economic and housing data from the U.S. Census Bureau,
- Employment data from the U.S. Bureau of Labor Statistics,
- Economic data from the U.S. Bureau of Economic Analysis,
- Investment data gathered in accordance with the Community Reinvestment Act,
- Home loan application data from the Home Mortgage Disclosure Act, and
- Housing complaint data from HUD.

Qualitative research included evaluation of relevant existing fair housing research and national and city fair housing legal cases. Additionally, this research included the evaluation of information gathered from several public input opportunities conducted in relation to this AI. This also included the 2014 City of Oklahoma City Fair Housing Survey distributed to stakeholders, interested parties, and participants in the public input process.

Geographic analyses of racial and ethnic distribution were conducted by calculating race or ethnicity as the percentage of total population and then plotting the data on a geographic map of Census tracts in the City of Oklahoma City. For the purposes of this AI, maps were produced for several racial and ethnic groups based on both 2000 and 2010 Census data in order to examine how the concentrations of these populations changed over time.

Ultimately, a list of potential impediments was drawn from these sources and further evaluated based on HUD's definition of impediments to fair housing choice, as presented on the previous page. Potential impediments to fair housing choice present within the city were identified; along with actions the city may consider in attempting to address possible impediments.

OVERVIEW OF FINDINGS

This AI includes a review of both public and private sector housing market contexts in the City of Oklahoma City to identify practices or conditions that may operate to limit fair housing choice in the city. Analysis of demographic, economic, and housing data included in that review establish the context in which housing choices are made. Demographic data indicate the sizes of racial and ethnic populations and other protected classes; economic and

[2] 42 U.S.C.A. §3601
[3] O.S. §1452
[4] Oklahoma City Code §§25-36—46. City code does not recognize familial status and disability as protected classes.

employment data show additional factors in influencing housing choice; and counts of housing by type, tenure, quality, and cost indicate the ability of the housing stock to meet the needs of the city's residents.

The contextual analysis described above provides a foundation for detailed review of fair housing laws, cases, studies, complaints, and public involvement data. The structure provided by local, city, and federal fair housing laws shapes the complaint and advocacy processes available in the city, as do the services provided by local, city, and federal agencies. Private sector factors in the homeownership and rental markets, such as home mortgage lending practices, have a substantial influence on fair housing choice. In the public sector, policies and practices can also significantly affect housing choice.

Complaint data and AI public involvement feedback further help define problems and possible impediments to housing choice for persons of protected classes, and confirm suspected findings from the contextual and supporting data.

Socio-Economic Context

Oklahoma City has grown steadily since 2000, from a population of 506,132 to an estimated 610,613 in 2013. Between 2000 and 2010, the city grew by an estimated 14.6 percent, with much of this growth driven by an increase in the number of residents aged less than five years, 25 to 34 years, and 55 to 64 years. These groups accounted for a larger share of city residents in 2010 than they had in 2000. All other age cohorts declined as a share of the total population, but on the whole the proportions of residents in each age group remained similar in 2010 to what they had been in 2000.

A more marked shift was observed in the city's racial and ethnic composition. White residents, who represented 68.4 percent of the population in 2000, came to account for 62.7 percent of the population in 2010. This decline of nearly six percentage points is explained largely by growth in the number of residents who identified themselves as "other" or belonging to two or more racial groups; the shares of black residents changed very little between the two Censuses, as growth in that population was only slightly less than the average rate of growth. The Hispanic population, by contrast, grew considerably between 2000 and 2010, nearly doubling in number. Having represented 10.1 percent of the population in 2000, Hispanic residents came to account for 17.2 percent of the population in 2010.

Changes in the racial and ethnic composition of the city described above were reflected in changes to the geographic distribution of the black and Hispanic populations. The black population changed little as a share of the city's overall population, and black residents remained disproportionately concentrated in Census tracts to the east and northeast of the city center. As the Hispanic population grew in absolute numbers and as a share of the population, the number of Census tracts with high concentrations of Hispanic residents grew. However, tracts that came to have a disproportionate share of Hispanic residents after 2000 tended to be located next to tracts that had relatively high shares of Hispanic residents in 2000; these were clustered to the southwest and west of the downtown area.

Residents with disabilities accounted for 21.5 percent of the population in 2000, and were highly concentrated in Census tracts near the interchange of Interstate 40 and Interstate 235 in

the city center. In 2008-2012, an estimated 13.3 percent of the population was living with some form of disability[5], and these residents remained concentrated in central Census tracts, including tracts to the east and south of the city center.

Though growth in the overall population was steady between 2000 and 2013, growth in the labor force and the number of employed has been subject to some fluctuation, according to data from the Bureau of Labor Statistics (BLS). The labor force and number of employed both declined from 2005 through 2007; the number of employed persons increased slightly in 2008, but fell dramatically in 2009. By contrast, the labor force has grown steadily since 2008, and these two trends together contributed to a spike in the unemployment rate that continued through 2010. In that year, 6.3 percent of the city's workers were out of a job. However, monthly unemployment data shows that the subsequent decline in the unemployment rate began in March of 2010, and continued through 2012. The unemployment rate ticked up slightly in 2012, and stood at 5.1 percent in that year.

After 2000, the number of full- and part-time jobs in the city declined by 14,000 through 2003 before entering a period of growth that lasted until 2008. After 2008, the number of jobs in the city fell by over 10,000. Growth in total employment resumed the following year. Real average earnings and real per capita income have both grown since 1995, though both showed substantial yearly fluctuation between 2006 and 2010. Since 2010, growth in earnings and incomes has been steady. Changes in real earnings and income are reflected by changes in household incomes between 2000 and 2012, during which time the share of households making less than $50,000 in current dollars fell while the share of households making $50,000 and over grew.

In spite of the fact that incomes in the city grew by several measures, the poverty rate also increased from 16 percent in 2000 to 17.6 percent in 2012. There were only a few Census tracts with disproportionate shares of poverty scattered throughout the city center. Tracts with above-average poverty rates were more common and widely distributed in the city center. By 2012, the number of tracts with above-average shares of poverty had grown considerably, and disproportionate shares of poverty were observed in Census tracts throughout the city center.

The composition of the city's housing stock changed very little between the two decennial Census counts: 89.6 percent of housing units were occupied in both years. Among occupied units, nearly 60 percent were owner-occupied in both years. Owner-occupied units were concentrated in peripheral Census tracts and were largely absent from the city center. By contrast, rental units tended to be concentrated in the city center, particularly in the downtown area and areas to the northeast and southwest of the downtown area. Vacant units, which accounted for 10.4 percent of the overall housing stock in 2000 and 2010, were concentrated in central tracts near the Interstate 235-Interstate 40 interchange. Units classified as "other vacant" were concentrated in Census tracts to the northeast and southwest of the downtown area.

[5] Note: The Census Bureau substantially changed the part of the ACS questionnaire pertaining to disabilities in 2008. For this reason, direct comparisons between 2000 Census counts and post-2008 ACS estimates are discouraged. Thus, it would not be correct to conclude, based on these data, that the share of residents with disabilities fell from 21.5 percent to 13.3 percent, since different measures were employed in each dataset.

The Census Bureau publishes data on additional housing problems, including overcrowding, incomplete plumbing and kitchen facilities, and cost-burdening. The share of housing units that were overcrowded; or those that had more than one resident per room; fell from 5 percent to less than 3 percent between 2000 and 2012. The share of housing units with incomplete plumbing facilities also fell, from 0.5 to 0.3 percent of all housing units. The number of units with incomplete kitchen facilities increased, but still only accounted for one percent of housing units in 2012. A more pervasive problem was cost-burdening: the share of city households that were paying more than 30 percent of their incomes toward housing costs grew from 25.5 to 32.6 percent—this problem fell more heavily on renters than on homeowners, as did the problem of overcrowding to a lesser degree.

Housing costs also increased between Census counts. Median contract rent, which includes the cost of rent and excludes additional charges, rose from $481 to $551. Similarly, median home values rose from $80,300 to $131,000 during the same time period. Census tracts with relatively high housing costs tended to be located in peripheral Census tracts. However, there were central Census tracts with relatively high housing costs, including the tract surrounding the interchange of Interstate 235 and Interstate 40.

Review of Fair Housing Laws, Studies, and Cases

Residents of Oklahoma City are protected from discrimination in the housing market by laws at the federal, state, and local level. Laws at the federal and state level include protections based on race, color, religion, sex, national origin, familial status, and disability; and state law extends additional protection based on age. Oklahoma City ordinances add ancestry and creed to federal protected class designations, but do not include protections based on familial status and disability. The discussion of national fair housing studies and cases highlights the forms in which discrimination may present itself in the housing market as well an increased scrutiny on the part of HUD in recent years of fair housing policies and practices. In spite of this increased scrutiny, the Department of Justice has not filed any fair housing cases against Oklahoma residents in the last decade.

Fair Housing Structure

Oklahoma City residents who feel that they have experienced unlawful discrimination in the housing market may file a complaint with HUD, the Oklahoma Attorney General's Office, the Oklahoma City Municipal Counselor, and the Metropolitan Fair Housing Council (MFHC). The latter, a local non-profit organization and Fair Housing Initiative Partnership (FHIP) grantee[6], contracts with the city to conduct fair housing activities, including investigation of fair housing complaints. Note that because federal, state, and local anti-discrimination laws recognize different protected classes in some cases, the agency to which a resident may bring his or her complaint will depend on the nature of the complaint. For example, those who file a complaint based on age discrimination with the Metropolitan Fair Housing Council will likely have their complaint referred, if meritorious, to the Oklahoma Attorney General rather than to HUD, since age discrimination in the private housing market would not represent a violation of the Fair Housing Act unless the housing project in question were a recipient of federal funding.

[6] FHIP grantees receive funding from HUD to carry fair housing activities at local and state levels (**See Section IV**).

Fair Housing in the Private Sector

Oklahoma City residents or prospective residents applied for 192,326 home purchases loans from 2004 through 2013. A majority of these, or 171,926, were intended to finance homes in which the owners planned to live themselves. Applications submitted in the City led to 85,618 loan originations and 16,806 denials, for an average denial rate of 16.4 percent. Applications were denied more frequently when the home in question was located close to the city center, or when it was located in areas to the northeast and southwest of the city center. Loan denials were also denied more frequently to female than to male applicants, to black applicants than to white applicants, and to Hispanic applicants than to non-Hispanic applicants. However, many of the areas in which black applicants were most frequently turned down for loans lay outside of areas with relatively high concentrations of black residents. More than a third of loan applications from Hispanic residents were denied in areas throughout the city center.

Credit history and debt-to-income ratio were the most common identified factors in loan denials in the city. Though credit history has consistently been a primary factor in loan denials, the importance of debt-to-income ratio has grown since 2004, when less than ten percent of loans were denied primarily due to debt-to-income ratio. By 2011, nearly a fifth of loans were denied primarily for that reason. Unsurprisingly, income was related to loan denial rates: the higher the applicant's income, the less likely he or she would be denied. However, racial and ethnic discrepancies in loan denial rates persisted even when applicants of different races were similarly situated with respect to income. Although income was equal in those cases, there were likely other factors that made some applications stronger than others. However, it should be of concern that those denial rates break along racial and ethnic minority lines.

In some cases, applicants who were able to secure a loan were issued loans with high annual percentage rates (HALs). Over 11 percent of all loans issued in the city from 2004 through 2013 were HALs, which are considered predatory in nature. Like loan denials, HALs were issued disproportionately to black and Hispanic borrowers, and were most common in the parts of the city in which those residents were disproportionately concentrated. However, black borrowers themselves were issued HALs with relative frequency throughout the city center, as were Hispanic applicants. In the case of black residents, HALs tended to appear more frequently outside of areas in which black residents were disproportionately concentrated in 2000 and 2010.

Geographic areas relatively low median incomes also tended to receive relatively little in the way of small business lending, according to data gathered under the Community Recovery Act. The 199,936 small business loans originated in the city between 2000 and 2013 tended to go to Census tracts with higher median family incomes, including downtown Census tracts and large tracts near the interchange of Interstate 235 and Interstate 44; the latter of which encompassed the Chesapeake Energy Corporation's Oklahoma City campus. As one might expect, the $8,475,173 in loan dollars issued in the city followed a similar geographic distribution.

The status of fair housing in the city was further evaluated through a review of housing discrimination complaints filed with HUD and the Metropolitan Fair Housing Council (MFHC). Disability was the most common perceived basis for discrimination in both datasets, cited in

141 HUD complaints and 347 complaints filed with the MFHC.[7] The next most commonly perceived basis for discrimination among HUD complaints was race, followed by family status. In complaints lodged with MFHC, familial status was the second most common complaint basis. Discrimination in the rental housing market was relatively common among HUD complaints.

Awareness of barriers to fair housing choice in the private sector was limited among respondents to the Fair Housing Survey: at most, one respondent in twelve reported being aware of barriers to fair housing choice in any of the industries or services mentioned. Those who did perceive discrimination in the private housing market cited several issues in comments submitted with the survey, including discrimination in the housing market on the basis of race and disability. In addition, those who responded to these questions with "don't know" represented a large share of responses to each question, suggesting that awareness or understanding of issues relating to fair housing is limited in the city.

Results of a survey of Oklahoma City attorneys suggest that complaints from Oklahoma City residents who believe that they have been subjected to illegal discrimination during their housing search tend to involve the rental housing market more often than any other market, and often pertain to discrimination on the basis of disability. These attorneys also highlighted the need for additional education among housing providers and residential tenants.

Fair Housing in the Public Sector

The assessment of affirmatively furthering fair housing in Oklahoma City's public sector included analysis of public assisted housing units, transportation networks, and data gathered through the 2014 Oklahoma City Fair Housing Survey. Data from these sources underscores some of the challenges to affirmatively furthering fair housing present in public policy in the city. Specific examples of such challenges include the placement of public assisted housing units in the city and NIMBYism[8].

Public assistance is provided in the housing market through HOME Assisted Rental Housing, Section 8 Housing Vouchers, Public Housing, and Down Payment Assistance. The first three programs offer subsidized rent to Oklahoma City residents, and are subject to income restrictions, which vary according to the program. Down Payment Assistance is available to homebuyers who purchase homes in certain areas of the city, and who participate in homebuyer education classes. Analysis of the geographic distribution of these units within the city reveals that they tend to be concentrated in areas of the city with relatively high rates of poverty and large shares of minority residents.

Results from the Public Sector portion of the 2014 Oklahoma City Fair Housing Survey reveal that perception of barriers to fair housing choice was limited in most of the public policy arenas mentioned. However, several survey participants perceived the effect of NIMBYism in land use and zoning policies, often pertaining to the placement of group housing and apartment complexes. Transportation was also a concern among survey respondents, who felt

[7] Note that some of the complaints received by MFHC are referred to HUD, so some of the same complaints may appear in both datasets.
[8] A "Not in my backyard" mentality

that the current transit network was not sufficient to meet the needs of the city's residents, particularly those without their own means of transportation.

Public Involvement

Public input during the AI process was sought through participation in the 2014 Fair Housing Survey, as well as a series of meetings held in Oklahoma City. The survey, which began in July 2014 and ended in January 2015, received 84 responses. The meetings, which included a fair housing forum, presentation to the city council, and a public input session where held in the city from October through December 2014.

Responses to the survey indicated that respondents are generally familiar with, and supportive of, fair housing laws, though opinion was somewhat more divided on how easy the laws are to understand, whether any changes to the laws are necessary, and whether current laws are adequately enforced. Less than half of all respondents were aware of any fair housing training process available in the city, and fewer still had taken advantage of such training or knew of any fair housing testing taking place in the city. Current levels of outreach, education, and testing were deemed to be insufficient by a substantial portion of respondents who answered those questions, and relatively few were aware of any fair housing plan at the city level.

The Fair Housing Forum that took place on October 9, 2014 in Oklahoma City allowed members of the public to learn more about fair housing and to discuss some of the challenges the city faces. Some of the more prominent themes of the discussion included a perceived apathy around the issue of fair housing, the prevalence of fair housing complaints on the basis of disability, and the impact of the recent closure of the state Human Rights Commission.

Impediments to Fair Housing Choice And Suggested Actions

Private Sector Impediments, Suggested Actions, and Measurable Objectives

***Impediment 1*: More frequent denial of home purchase loans to black, Hispanic, and female applicants.** This impediment was identified through review of home purchase loan data collected under the Home Mortgage Disclosure Act (HMDA). It should be noted that many of the factors that bear on the decision to approve or deny a loan are not captured in HMDA data. Nevertheless, the data do allow for a determination of whether the outcome of a loan application is likely to differ based on the race, ethnicity, or gender of the applicant. As discussed in **Section V**, black, Hispanic, and female applicants were more likely to be denied loans than white, non-Hispanic, and male borrowers, respectively. In the case of black and Hispanic borrowers, such discrepant loan rates held even when applicants were similarly situated with respect to income. Furthermore, the geographic distribution of loan denial rates demonstrated that areas with high concentrations of black and Hispanic residents had higher rates of loan denials.

Action 1.1: Enhance outreach and education to first time homebuyers.
Measurable Objective 1.1: Number of homebuyer education training sessions offered and number of attendees
Action 1.2: Enhance understanding of the value of credit and the ability to keep and maintain good credit

Measureable Objective 1.2: Number of credit counseling sessions offered and number of participants in those sessions

***Impediment 2*: Predatory style lending falls more heavily on Black and Hispanic borrowers.** This impediment was also identified through review of data collected under HMDA. Black and Hispanic borrowers were more likely to receive loans with high annual percentage rates (HALs) than white and non-Hispanic borrowers, respectively. This trend was also reflected in the geographic distribution of these loans, which tended to be more heavily concentrated in areas with higher concentrations of black and Hispanic residents.

Action 2.1: Enhance outreach and education to first time homebuyers
Measurable Objective 2.1: Number of homebuyer education training sessions offered and number of attendees
Action 2.2: Improve understanding of the attributes of predatory lending, and discourage borrowers from utilizing predatory lending
Measureable Objective 2.2: Published information regarding predatory style lending on city website, including how to identify such loans, inclusion of this information in homebuyer education and credit counseling sessions, number of such sessions held and record of participation
Action 2.3: Reach out to local bankers and solicit their input on methods to make consumers better aware of the attributes of such loans
Measureable Objective 2.3: Record of outreach efforts, number of bankers contacted, compiled list of recommendations

***Impediment 3*: Discriminatory terms, conditions, privileges, or facilities relating to rental; refusal to rent.** This impediment was identified through review of fair housing complaints submitted to HUD and the Metropolitan Fair Housing Council by Oklahoma City residents.

Action 3.1: Enhance outreach and education to renters
Measurable Objective 3.1: Number of outreach and education training sessions conducted, number of participants
Action 3.2: Enhance outreach and education to housing providers so that they understand fair housing law and their duties under the law
Measureable Objective 3.2: Number of outreach and education training sessions conducted, number of participants

***Impediment 4*: Failure to make reasonable accommodation.** Failure to make reasonable accommodation was cited specifically in over ten percent of the complaints lodged with HUD from 2004 through 2014, and disability was the most common alleged basis of discrimination in complaints lodged with HUD and with the MFHC. In addition, commentary submitted with questions in the private sector portion of the fair housing survey identified residents with disabilities as subject to discrimination in the private housing market. Commentary in the public sector portion of the survey highlighted NIMBYism as a barrier present in the housing market, and maintained that neighborhood opposition to group homes served to bar residents of such housing from certain areas in the city. In addition, in a recent forum discussion held in the city of Oklahoma City, a representative of Legal Aid noted that the most common complaints lodged with the organization pertained to discrimination on the basis of disability.

Many of these complaints involved a failure or refusal to make a reasonable accommodation for residents with disabilities.

Action 4.1: Conduct audit tests of new market rate construction, and publish the results of such testing
Measurable Objective 4.1: Number of audit tests conducted, record of publication of results of testing
Action 4.2: Conduct outreach and education for providers of multifamily housing
Measureable Objective 4.2: Number of outreach and education training sessions conducted, number of participants
Action 4.3: Encourage developers and builders of housing to attend fair housing training sessions that include reasonable accommodation and modification
Measureable Objective 4.3: Identified incentives for attendance and record of outreach to developers and builders concerning fair housing training sessions

***Impediment 5*: Lack of understanding of fair housing laws.** National fair housing studies presented in **Section III** have consistently revealed that members of the public are often misinformed or uninformed about fair housing laws. A substantial minority of survey respondents professed to be unfamiliar with fair housing laws and programs, and a considerable number of "don't know" responses to survey questions designed to gauge public awareness of fair housing laws suggests that survey respondents do not have a strong grasp of the substance of the laws. Furthermore, more than a sixth of survey respondents incorrectly identified "sexual orientation" as a protected class in Oklahoma City.

Action 5.1: Engage parties for co-sponsoring events in April during Fair Housing Month
Measurable Objective 5.1: Number of parties contacted, number of parties that commit to co-sponsorship of events
Action 5.2: Conduct educational training sessions for consumers, providers of housing, and program management staff
Measureable Objective 5.2: Number of education training sessions conducted, number of participants
Action 5.3: Add selection criteria to assisted housing location proposals that give credit to developers and others who have attended fair housing trainings, including those trainings designed to enhance reasonable accommodation or modification
Measureable Objective 5.3: Determination of credit to be given for attendance at fair housing training sessions, inclusion of criteria in assisted housing location proposals

Public Sector Impediments, Suggested Actions, and Measurable Objectives

***Impediment 1*: Insufficient understanding or fair housing laws.** This impediment was included in the list of private sector impediments as Impediment 5, and the rationale behind its inclusion as a public sector impediment is the same as discussed above. Lack of knowledge of fair housing laws is not exclusively the product of private or public sector forces, and engagement of both sectors is necessary to promote wider awareness and understanding of those laws and policies.

Action 1.1: Engage parties for co-sponsoring events in April during Fair Housing Month

Measurable Objective 1.1: Number of parties contacted, number of parties that commit to co-sponsorship of events

Action 1.2: Conduct educational training sessions for consumers, providers of housing, and program management staff

Measureable Objective 1.2: Number of education training sessions conducted, number of participants

Action 1.3: Promote and distribute fair housing flyers

Measureable Objective 1.3: Number of fair housing flyers produced and distributed, display of fair housing flyer on city website during fair housing month

***Impediment 2*: Concentration of subsidized and assisted housing in areas with high concentrations of minority residents and households in poverty.** This impediment was identified through review of the geographic distribution of Section 8 Vouchers, HOME Assisted Rental Housing, Public Housing, and units purchased through Down Payment Assistance. The number of assisted units in an area was observed to be positively correlated with the poverty rate of an area, as well as the concentration of racial and ethnic minority residents. Such areas are better served by public transit than areas with lower poverty rates, and have often been targeted for investment of public funds as part of revitalization efforts. However, because residents of assisted housing tend to be people of color, policies that concentrate such units in areas with high concentrations of minority residents may inadvertently serve to further concentrate minority residents in certain areas of the city. Therefore, care is needed to develop policies that discourage concentration of minority residents while continuing to serve the goals of revitalization of low-income areas.

Action 2.1: Add selection criteria to assisted housing location proposals that give credit to considering the racial, ethnic, and income characteristics of the neighborhood in which the housing facility is to be placed

Measurable Objective 2.1: Identification of criteria and inclusion of these criteria in assisted housing location proposals

Action 2.2: Evaluate the past set of selection criteria and determine what went wrong with the prospective housing locations, thereby explaining the concentrations that have occurred

Measureable Objective 2.2: Identification of factors in past selection criteria

Action 2.3: Review planning and zoning ordinances to allow for the greater geographic distribution of such multi-family units or affordable housing units

Measureable Objective 2.3: Identification of the number and locations of zoning districts that restrict the placement of multi-family units

***Impediment 3*: NIMBYism used to block multifamily development.** This impediment was identified through review of responses to the 2014 Fair Housing Survey. When asked to comment on specific barriers to fair housing choice in land use policies and zoning laws, survey respondents cited NIMBYism as such a barrier, and several respondents maintained that group homes and apartment complexes were especially likely to be targets of neighborhood opposition.

Action 3.1: Consider methods to overcome NIMBYism

Measurable Objective 3.1: Record of discussions, meetings, and correspondence pertaining to NIMBYism, compiled list of actions the city might take to reduce the influence of NIMByism

Action 3.2: Enhance understanding for affordable housing in alternative locations through outreach and education

Measureable Objective 3.2: Number of outreach and education sessions conducted and record of participation in these training sessions

Action 3.3: Prepare case studies that highlight the benefits of affordable housing development intermixed with other land uses

Measureable Objective 3.3: Preparation of case studies, record of efforts to publish and disseminate reports to local housing market stakeholders

***Impediment 4*: Zoning presents a barrier in some areas.** As noted above, some survey respondents considered zoning and land use decisions to be a conduit for neighborhood opposition to the placement of group housing and multi-family development. Other respondents maintained that zoning policies had the effect of limiting fair housing choice in and of themselves, in that they limit certain areas to uses that preclude multifamily development.

Action 4.1: Convene a work group to address which zoning codes represent barriers in some areas, determine which zoning codes those represent, and where, and assess policies or practices to eliminate or modify the codes so that such impacts are lessened or eliminated

Measurable Objective 4.1: Identification of those zoning codes, as well as the extent and location of zoning districts that restrict the location of multi-family housing

***Impediment 5*: Lack of adequate public transit in the city.** This impediment was identified through input of stakeholders who participated in the 2014 Fair Housing Survey. More survey respondents identified barriers to fair housing choice in access to government services than any other public sector area, and most of those who indicated that they were aware of barriers in this area identified limited public transportation as a challenge to fair housing choice.

Action 5.1: Determine which transit routes need to be modified or created

Measurable Objective 5.1: Identification of transit routes and areas that are currently underserved by public transit available in the city

Action 5.2: Solicit input from the affected public on ways to improve the overall transit system

Measureable Objective 5.2: Record of attempts made to solicit public input, number of recommendations received, list of recommendations compiled

Action 5.3: Solicit input from the transit agency to better understand the institutional reasoning of why some of the suggested options may not be feasible, yet

Measureable Objective 5.3: Record of outreach to transit agency, number of attempts to secure input, record of dialogue and identification of institutional barriers to the expansion of public transit into currently underserved areas

***Impediment 6:* Insufficient fair housing protections in city anti-discrimination law.** This impediment was identified through review of the fair housing laws in effect in the city of Oklahoma City. The Oklahoma City statute concerning discrimination in housing (§ 25-39) was

last updated in 1980, before familial status and disability were recognized as protected classes by the federal Fair Housing Act. The statute does not provide for protections from discrimination in the housing market based on disability or familial status. As well, it has not kept pace with State Law, since State Law has protections for age.

Action 6.1: Recommend that the City Council pass legislation recognizing disability, familial status, and age as protected classes under Oklahoma City law

Measurable Objective 6.1: Record of correspondence with the city council concerning the need to include disability, familial status, and age as protected classes

SECTION I. INTRODUCTION

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 based on 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:

1. The Fair Housing Act,
2. The Housing Amendments Act, and
3. The Americans with Disabilities Act.

The purpose of fair housing law is to protect a person's right to own, sell, purchase, or rent housing of his or her choice without fear of unlawful discrimination. The goal of fair housing law is to allow everyone equal access to housing.

WHY ASSESS FAIR HOUSING?

Provisions to affirmatively further fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD's) housing and community development programs. These provisions are articulated in Section 808(e) (5) of the federal Fair Housing Act, which requires that the Secretary of HUD administer federal 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 planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG)[9], and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle.

As a part of the consolidated planning process, states and entitlement communities that receive such funds as a formula allocation directly from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing. The AFFH certification process has three parts:

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

In the *Fair Housing Planning Guide*, page 2-8, HUD notes that impediments to fair housing choice are:

[9] The Emergency Shelter Grants program was renamed the Emergency Solutions Grants program in 2011.

- "Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices [and]
- Any actions, omissions, or decisions which have [this] effect."[10]

State and local governments may enact fair housing laws that extend protection to other groups as well. For example, Oklahoma statutes extend an additional protection based on age.[11] Oklahoma City's code of ordinances also extends additional protections based on creed and ancestry, though it does not identify familial status or disability as protected classes.[12] A comparison of protected class designations by federal and city law is presented below in Table I.1.

Table I.1
Comparison of Fair Housing Laws
City of Oklahoma City

Protected Group	Federal Fair Housing Act	State of Oklahoma	City of Oklahoma City
Race	X	X	X
Sex	X	X	X
Religion	X	X	X
Familial Status	X	X	
Disability	X	X	
National Origin	X	X	X
Color	X	X	X
Age		X	
Creed			X
Ancestry			X

It is essential to distinguish between fair housing and housing production. As discussed above, fair housing protections at the federal level do not include consideration of income and do not address housing affordability outside the context of housing discrimination. While lack of affordable housing can be a significant concern to policymakers, it is not, on its own, a fair housing problem unless members of protected classes face this issue disproportionately. In fact, a large increase in affordable units in close proximity to one another can cause a problem for fair housing choice in some cases, such as the segregation of racial or ethnic minorities. In addition, the AI does not seek to address future affordable housing needs or specific affordable housing production goals.

PURPOSE OF THIS RESEARCH

HUD interprets the broad objectives of affirmatively furthering fair housing to include:

- "Analyzing and working to eliminate housing discrimination in the jurisdiction;
- Promoting fair housing choice for all persons;

[10] *Fair Housing Planning Guide.*
[11] O.S. §25-1452
[12] Oklahoma City Code §§25-36—46.

- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy;
- Promoting housing that is physically accessible to, and usable by, all persons, particularly individuals with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act."[13]

The objective of the 2014 AI process was to research, analyze, and identify prospective impediments to fair housing choice throughout the city. The goal of the completed AI is to suggest actions that the city can consider when working toward eliminating or mitigating the identified impediments.

LEAD AGENCY

The agency that led the effort of preparing this report on behalf of the City of Oklahoma City was the Housing and Community Development Division of the Oklahoma City Planning Department.

Commitment to Fair Housing

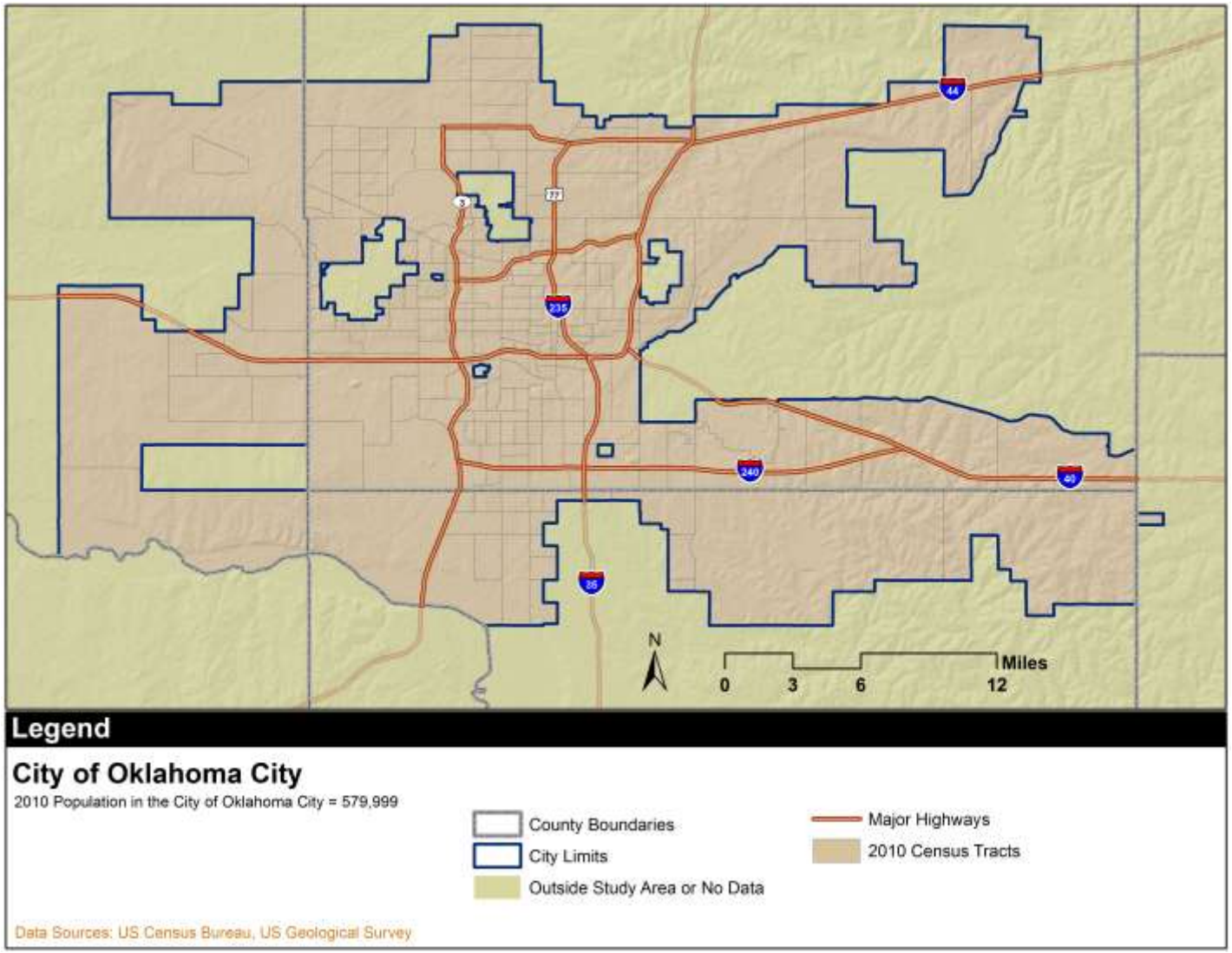
In accordance with the applicable statutes and regulations governing the Consolidated Plan, the City of Oklahoma City certifies that it will *affirmatively further fair housing*. This statement means that it has conducted an AI, will take appropriate actions to overcome the effects of any impediments identified through that analysis, and will maintain records that reflect the analysis and actions taken in this regard.

GEOGRAPHIC SCOPE OF THE ANALYSIS

This AI addresses the status of fair housing within the City of Oklahoma City. Map I.1 on the following page displays the City of Oklahoma City, along with selected major highways and county and Census tract boundaries.

[13] *Fair Housing Planning Guide*, p.1-3.

Map I.1
City of Oklahoma City Study Area
City of Oklahoma City
2010 Census Bureau Data



RESEARCH METHODOLOGY

The AI process involves a thorough examination of a variety of data related to housing, particularly for persons who are protected under fair housing laws. AI sources include Census data, employment and income information, home mortgage application data, business lending data, fair housing complaint information, surveys of housing industry experts and stakeholders, and related information found in the public domain. Relevant information was collected and evaluated via four general approaches:

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

Some baseline secondary and quantitative data were drawn from the Census Bureau, including 2000 and 2010 Census counts, as well as American Community Survey data averages from 2008 through 2012. Data from these sources detail population, personal income, poverty, housing units by tenure, cost burdens, and housing conditions. Other data were drawn from records provided by the Bureau of Labor Statistics, the Bureau of Economic Analysis, and a variety of other sources. The following narrative offers a brief description of other key data sources employed for the 2014 AI for the City of Oklahoma City.

Home Mortgage Disclosure Act Data

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 2004 through 2012 were 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.

Fair Housing Complaint Data

Housing complaint data were used to analyze discrimination in the renting and selling of housing. HUD provided fair housing complaint data for the city from 2004 through 2013. This information included the basis, or protected class pursuant to the complaint; the issue, or prospective discriminatory action, pursuant to the grievance; and the closure status of the alleged fair housing infraction, which relates to the result of the investigation. The review of 325 fair housing complaints from within the city allowed for inspection of the tone, the relative

degree and frequency of certain types of unfair housing practices, and the degree to which complaints were found to be with cause.

The Metropolitan Fair Housing Council also provided data on 686 complaints it received from 2009 through the middle of 2014. Analysis of complaint data focused on determining which protected classes may have been disproportionately impacted by housing discrimination based on the number of complaints, while acknowledging that many individuals may be reluctant to step forward with a fair housing complaint for fear of retaliation or similar repercussion.

Fair Housing Survey

HUD recommends that surveys be conducted during the AI process to gain input from the public regarding perceived impediments to fair housing choice in an area. As such, the city elected to utilize a survey instrument as a means to encourage public input in the AI process. This step was a cost-effective and efficient method to utilize research resources. The survey targeted individuals involved in the housing arena, although anyone was allowed to complete the survey.

The survey was designed to address a wide variety of issues related to fair housing and affirmatively furthering fair housing. If limited input on a particular topic was received, it was assumed that the entirety of stakeholders did not view the issue as one of high pervasiveness or impact. This does not mean that the issue was nonexistent in the city, but rather that there was no widespread perception of its prevalence, as gauged by survey participants. The following narrative summarizes key survey themes and data that were addressed in the survey instrument.

Federal, State, and Local Fair Housing Laws

The first section of the survey asked respondents to address a number of questions related to fair housing laws, including assessment of their familiarity with and understanding of these laws, knowledge of classes of persons protected by these laws, the process for filing fair housing complaints, and an inquiry into whether or not fair housing laws should be changed.

Fair Housing Activities

The second section of the survey evaluated stakeholders' awareness of and participation in fair housing activities in the city, including outreach activities such as trainings and seminars, as well as enforcement activities such as fair housing testing exercises.

Barriers to Fair Housing Choice in the Private Sector

This section addressed fair housing in the City of Oklahoma City's private housing sector and offered a series of two-part questions. The first part asked respondents to indicate awareness of questionable practices or barriers to fair housing choice in a variety of private sector industries, and the second part requested a narrative description of these questionable practices or concerns from those who stated that they were aware of such a barrier. The specific areas of the private sector that respondents were asked to examine included the:

- Rental housing market,
- Real estate industry,
- Mortgage and home lending industries,
- Housing construction or accessible housing design fields,
- Home insurance industry,
- Home appraisal industry, and
- Any other housing services.

The use of open-ended questions allowed respondents to address any number of concerns such as redlining, neighborhood issues, lease provisions, steering, substandard rental housing, occupancy rules, and other fair housing issues in the private housing sector of the city.

Fair Housing in the Public Sector

Just as in the section of the survey concerning private sector barriers, respondents were asked to offer insight into their awareness of questionable practices or barriers to fair housing in the public sector. A list of areas within the public sector was provided, and respondents were asked first to specify their awareness of fair housing issues within each area. If they were aware of any fair housing issues, they were asked to further describe these issues in a narrative fashion. Respondents were asked to identify fair housing issues within the following public sector areas related to housing:

- Land use policies,
- Zoning laws,
- Occupancy standards or health and safety codes,
- Property tax policies,
- Permitting processes,
- Housing construction standards,
- Neighborhood or community development policies, and
- Any other public administrative actions or regulations.

The questions in this section were used to identify fair housing issues in the city regarding zoning, building codes, accessibility compliance, subdivision regulations, displacement issues, development practices, residency requirements, property tax policies, land use policies, and NIMBYism.[14]

Additional Questions

Finally, respondents were asked about their awareness of any local fair housing plans or specific geographic areas of the city with fair housing problems. Respondents were also asked to leave additional comments.

[14] "Not In My Backyard" mentality

Public Involvement

This section discusses analysis of fair housing in the City of Oklahoma City as gathered from various public involvement efforts conducted as part of the AI process. Public involvement feedback is a valuable source of qualitative data about impediments, but, as with any data source, citizen comments alone do not necessarily indicate the existence of city-wide impediments to fair housing choice. However, survey and forum comments that support findings from other parts of the analysis reinforce findings from other data sources concerning impediments to fair housing choice.

Research Conclusions

The final list of impediments to fair housing choice for the City of Oklahoma City was drawn from all quantitative, qualitative, and public input sources, and was based on HUD's definition of an impediment to fair housing choice as any action, omission, or decision that affects housing choice because of protected class status. The determination of qualification as an impediment was derived from the frequency and severity of occurrences drawn from quantitative and qualitative data evaluation and findings.

SECTION II. SOCIO-ECONOMIC CONTEXT

This section presents demographic, economic, and housing information collected from the Census Bureau, the Bureau of Economic Analysis, the Bureau of Labor Statistics, and other sources. Data were used to analyze a broad range of socio-economic characteristics, including population growth, race, ethnicity, disability, employment, poverty, and housing trends; these data are also available by Census tract, and are shown in geographic maps. Ultimately, the information presented in this section illustrates the underlying conditions that shape housing market behavior and housing choice the City of Oklahoma City.

To supplement 2000 and 2010 Census data, data for this analysis was also gathered from the Census Bureau's American Community Survey (ACS). The ACS data cover similar topics to the decennial counts but include data not appearing in the 2010 Census, such as household income and poverty. The key difference of these datasets is that ACS data represent a five-year average of annual data estimates as opposed to a point-in-time 100 percent count; the ACS data reported herein span the years from 2008 through 2012. The ACS population estimates are not directly comparable to decennial Census counts because they do not account for certain population groups such as the homeless and because they are based on samples rather than counts of the population. However, percentage distributions from the ACS data can be compared to distributions from the 2000 and 2010 Censuses.

DEMOGRAPHICS

As part of the essential review of the background context of the City of Oklahoma City markets in which housing choices are made, detailed population and demographic data are included to describe the city's residents. These data summarize not only the protected class populations, but characteristics of the total population for the entire city. These data help to determine whether over-concentrations of racial and ethnic minorities exist, and if so, which areas of the city are most affected.

POPULATION DYNAMICS

Table II.1 at right presents population counts for the City of Oklahoma City, as drawn from the 2000 and 2010 Censuses, and intercensal estimates for 2001 through 2009 and 2011 through 2013. In total, the population in the city grew from 506,132 persons in 2000 to an estimated 610,613 in 2013, an increase of 20.6 percent. According to intercensal estimates, the population grew steadily between 2000 and 2013, at an average rate of around 8,000 persons per year.

Table II.1
Census and Intercensal Population Estimates
City of Oklahoma City
2000, 2010 Census and Intercensal Estimates

Year	Estimate
Census 2000	**506,132**
July 2001 Est.	512,224
July 2002 Est.	519,405
July 2003 Est.	525,008
July 2004 Est.	530,508
July 2005 Est.	537,870
July 2006 Est.	546,595
July 2007 Est.	554,280
July 2008 Est.	561,926
July 2009 Est.	572,448
Census 2010	**579,999**
July 2011 Est.	589,814
July 2012 Est.	599,679
July 2013 Est.	610,613
Change 00 – 13	**20.6%**

POPULATION BY AGE

Considered by age, the fastest growing group in the city from 2000 through 2010 was composed of residents aged 55 to 64, as shown in Table II.2 on the following page. The number of residents in this

age cohort increased by 51.4 percent; well over the average growth rate of 14.6 percent. As a result, the share of residents in this age group grew for 8.3 percent to 10.9 percent. The population under the age of 5 also grew as a share of the total population, by 0.6 percentage points, along with the population aged from 25 to 34 years, which grew by 0.7 percentage points. The largest age cohort in both years included residents aged 35 to 54, who accounted for over a quarter of the population in both Census counts. However, this group declined as a share of the overall population.

Table II.2
Population by Age
City of Oklahoma City
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	37,194	7.3%	45,873	7.9%	23.3%
5 to 19	106,746	21.1%	116,763	20.1%	9.4%
20 to 24	39,703	7.8%	43,329	7.5%	9.1%
25 to 34	76,444	15.1%	91,906	15.8%	20.2%
35 to 54	146,003	28.8%	153,229	26.4%	4.9%
55 to 64	41,944	8.3%	63,492	10.9%	51.4%
65 or Older	58,098	11.5%	65,407	11.3%	12.6%
Total	**506,132**	**100.0%**	**579,999**	**100.0%**	**14.6%**

The elderly population changed little as a share of the overall population, though groups within that population grew at different rates, as shown in Table II.3 below. The number of residents aged 65 to 69 grew relatively quickly, as did the number of residents over the age 80. By contrast, the cohort of residents aged 70 to 74 grew by only 1 percent; well below the average rate of 12.6 percent for the elderly population. As a result, this cohort, which accounted for more than a quarter of all elderly residents in 2000, shrank to 22.8 percent of the population. At the same time, the number of residents aged 75 to 79 declined by 3.2 percent.

Table II.3
Elderly Population by Age
City of Oklahoma City
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	6,666	11.5%	8,929	13.7%	33.9%
67 to 69	9,427	16.2%	11,476	17.5%	21.7%
70 to 74	14,781	25.4%	14,932	22.8%	1.0%
75 to 79	12,407	21.4%	12,012	18.4%	-3.2%
80 to 84	7,885	13.6%	9,354	14.3%	18.6%
85 or Older	6,932	11.9%	8,704	13.3%	25.6%
Total	**58,098**	**100.0%**	**65,407**	**100.0%**	**12.6%**

POPULATION BY RACE AND ETHNICITY

There were also some marked changes in the racial and ethnic composition of the city between 2000 and 2010, as shown in Table II.4 on the following page. Though white residents accounted for the largest share of the population in both years, a relatively slow rate of growth in this population meant that that this share declined by nearly 6 percentage points. The black population grew at a rate that was just below average, and accounted for 15.1 percent of the population in 2010; down from 15.4 percent in 2000. By contrast, the Asian population grew at over twice the average rate, and grew as a share of the total population from 3.5 to 4.0

percent. The change in the city's ethnic composition was more pronounced, as the number of Hispanic residents nearly doubled. Hispanic residents accounted for 17.2 percent of the population in 2010, up from 10.1 percent in 2000, an increase of 7.1 percentage points.

Table II.4
Population by Race and Ethnicity
City of Oklahoma City
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	346,226	68.4%	363,646	62.7%	5.0%
Black	77,810	15.4%	87,354	15.1%	12.3%
American Indian	17,743	3.5%	20,533	3.5%	15.7%
Asian	17,595	3.5%	23,310	4.0%	32.5%
Native Hawaiian/ Pacific Islander	360	0.1%	586	0.1%	62.8%
Other	26,705	5.3%	54,593	9.4%	104.4%
Two or More Races	19,693	3.9%	29,977	5.2%	52.2%
Total	**506,132**	**100.0%**	**579,999**	**100.0%**	**14.6%**
Non-Hispanic	454,764	89.9%	479,961	82.8%	5.5%
Hispanic	51,368	10.1%	100,038	17.2%	94.7%

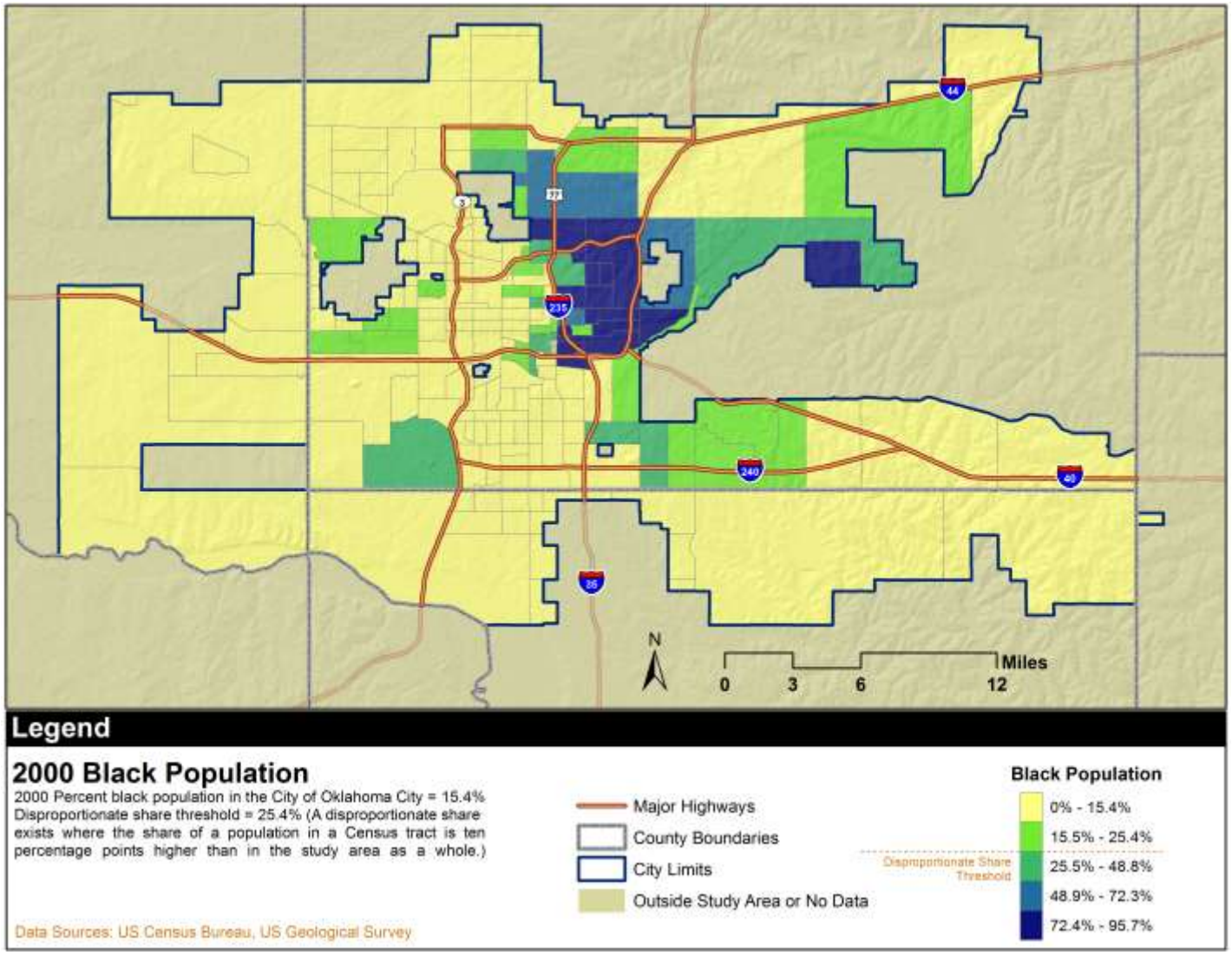
The geographic distribution of racial and minority residents can vary significantly throughout a community. For the purposes of this study, a population represents a "disproportionate share" if its share of a Census tract population is ten percentage points higher than in the city as a whole. For example, black residents represented 15.4 percent of the city population in 2000. Any Census tract in which more than 25.4 percent of residents were black in that year held a disproportionate share of black residents.

In fact, there were several Census tracts in which the black population exceeded that 25.4 percent disproportionate share threshold in 2000, as shown in Map II.1 on the following page. These tracts were located almost entirely to the east and northeast of the city center, in the area loosely bounded by Interstate 44 to the North and Interstate 35 to the East. Black residents accounted for more than 90 percent of the population of Census tracts throughout most of that area.

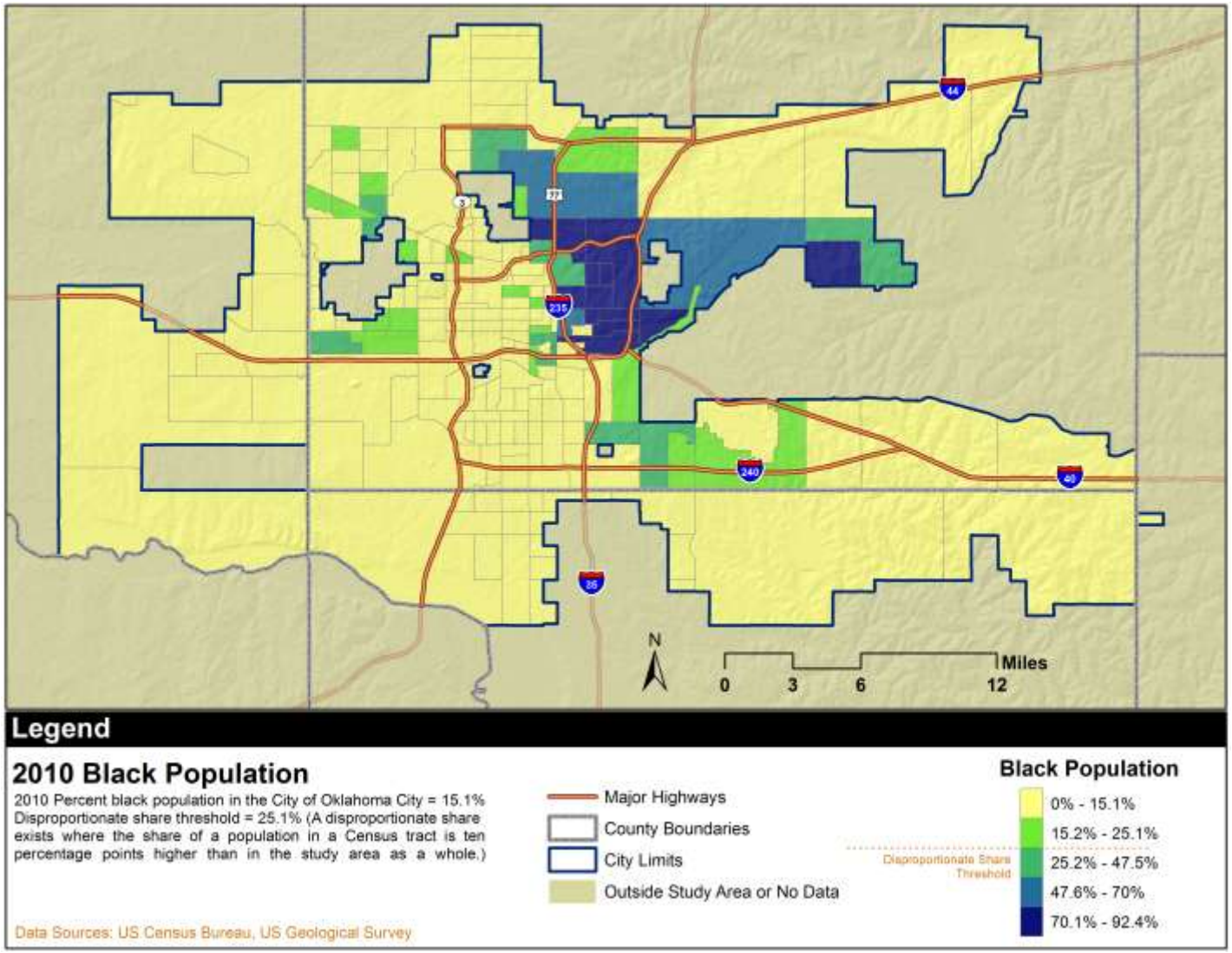
The overall distribution of the black population changed little between 2000 and 2010, as evidenced by Map II.2 on page 27. However, while there had been eleven Census tracts in which more than 90 percent of residents were black in 2000, in 2010 there were only two, suggesting that the black population had become somewhat less concentrated over the decade. However, Census tracts that retained high concentrations of black residents were still predominantly located to the east and northeast of the city center.

By contrast, the Hispanic population was concentrated in Census tracts to the west and southwest of the city center, as shown in Map II.3 on page 28. More than half the population was Hispanic in many of these tracts. The highest concentrations of Hispanic residents were observed to the east of the Arts District, and in neighborhoods in and around Riverside, Capitol Hill, Heronville, and Airpark.

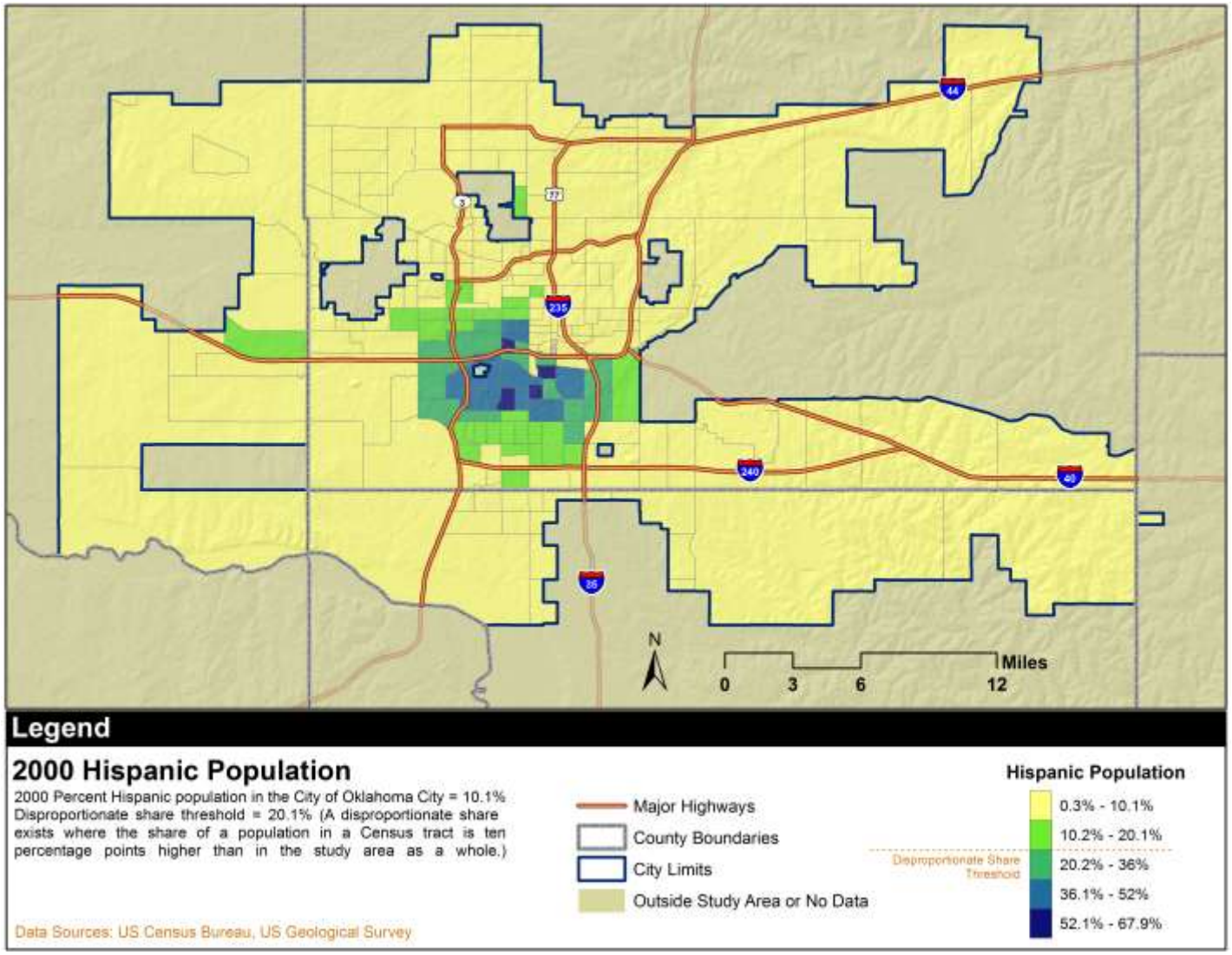
Map II.1
Black Population by Census Tract, 2000
City of Oklahoma City
2000 Census Data



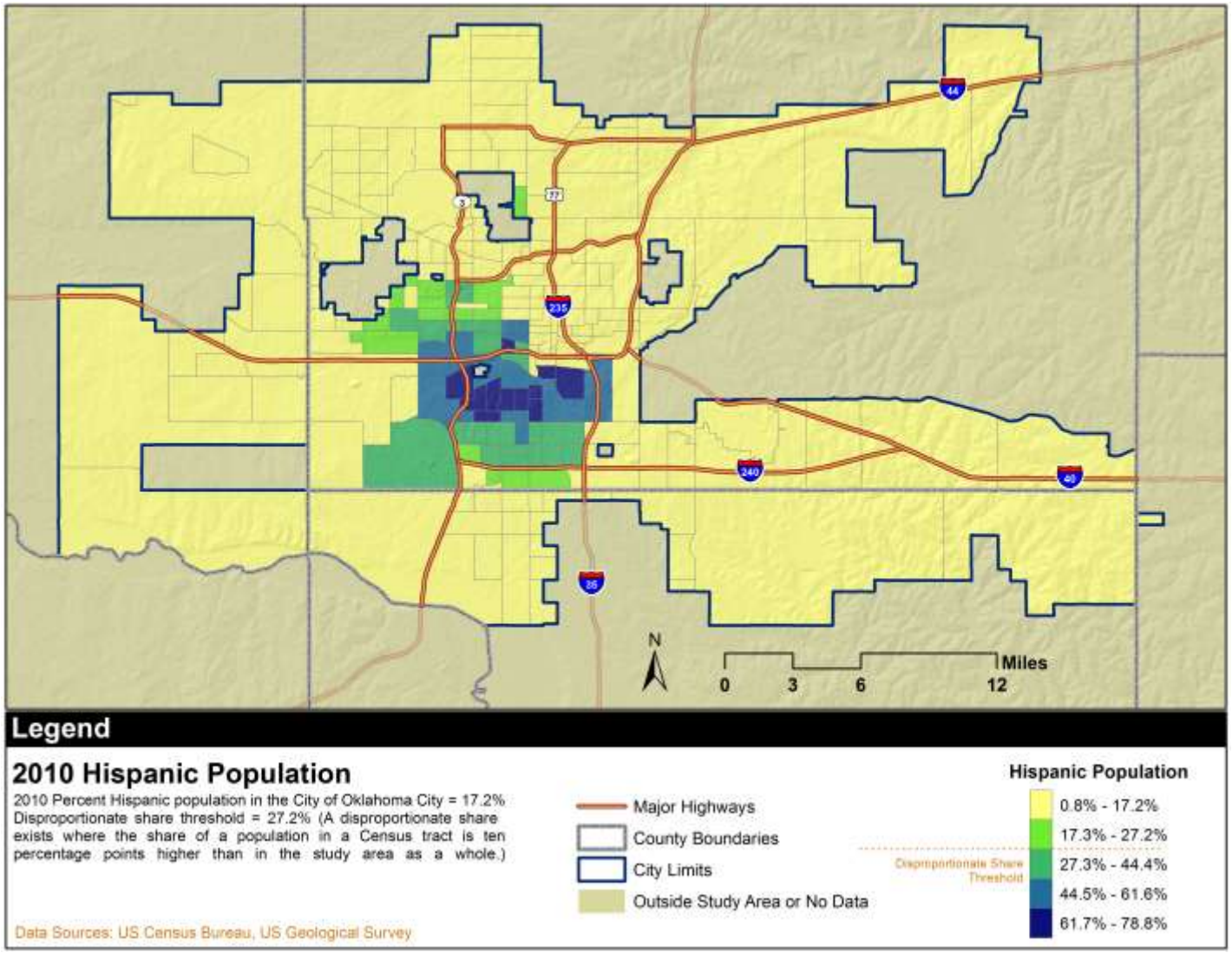
Map II.2
Black Population by Census Tract, 2010
City of Oklahoma City
2010 Census Data



Map II.3
Hispanic Population by Census Tract, 2000
City of Oklahoma City
2000 Census Data



Map II.4
Percent Hispanic Population by Census Tract, 2010
City of Oklahoma City
2010 Census Data



By 2010, the Hispanic population had become considerably more concentrated within that same overall area, as shown in Map II.4 on the previous page. Indicative of this trend was the further concentration of Hispanic residents in tracts in which they had previously been highly concentrated: In 2000, the highest percentage of Hispanic residents observed in any Census tract was 67.9 percent. In 2010 there were seven Census tracts in which the concentration of Hispanic residents exceeded that figure. All of these were areas in which Hispanic residents had been disproportionately concentrated in 2000.

DISABILITY STATUS

The Census bureau also gathers data relating to disabilities, which are broadly defined in the ACS as "limitations of activities and restrictions to full participation at school, at work, at home, or in the community" arising from the interaction among individuals' bodies and the physical and social environments in which they live, work, or play.[15] In 2000, approximately 21.5 percent of the population was living with some form of disability, according to the decennial Census. As shown in Table II.5 below, this figure included 4,605 children under the age of five, 69,031 persons aged 16 to 64, and 24,873 residents aged 65 and older. In the 2008-2012 ACS, 13.3 percent of the population was observed to be living with a disability, as seen in Table II.6 below.

Table II.5
Disability by Age
City of Oklahoma City
2000 Census SF3 Data

Age	Total	
	Disabled Population	Disability Rate
5 to 15	4,605	5.9%
16 to 64	69,031	21.3%
65 and older	24,873	44.7%
Total	**98,509**	**21.5%**

Table II.6
Disability by Age
City of Oklahoma City
2012 Five-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	298	1.3%	281	1.2%	579	1.2%
5 to 17	3,531	6.8%	2,217	4.5%	5,748	5.7%
18 to 34	4,203	5.8%	4,060	5.4%	8,263	5.6%
35 to 64	17,289	16.5%	18,025	16.5%	35,314	16.5%
65 to 74	4,939	31.0%	5,560	29.3%	10,499	30.1%
75 or Older	5,692	50.8%	9,850	57.2%	15,542	54.7%
Total	**35,952**	**12.8%**	**39,993**	**13.7%**	**75,945**	**13.3%**

[15] *American Community Survey 2012 Subject Definitions*. US Census Bureau, 55. This conception of disability differs from the one in operation during the 2000 Census, and was adopted by the Census Bureau in 2008. In some cases, residents who met the definitions of disability employed in the earlier Census count would not meet the definition employed in the ACS subsequent to 2008, and vice versa. For this reason, the Census Bureau discourages comparisons between the2000 Census count and ACS estimates from 2008 onward. Accordingly, though the disability rate was observed to be 21.5 percent in 2000, and 13.3 percent in the 2008-2012 ACS, it would not be correct to assume that the disability rate fell by 8.2 percentage points on the basis of those data.(See Brault, Matthew W. *Review of Changes to the Measurement of Disability in the 2008 American Community Survey*. September 22, 2009: US Census Bureau. September 8, 2014. http://www.census.gov/people/disability/files/2008ACS_disability.pdf)

Above average and disproportionate concentrations of residents with disabilities are presented in Map II.5 on the following page. These residents accounted for more than half of the population in three Census tracts in and around the downtown area. Indeed, though there were a couple of outlying tracts with disproportionate shares of residents with disabilities, most of these tracts were located in central Census tracts.

The same was true in 2008-2012, as shown in Map II.6 on page 33. The highest concentration of residents with disabilities in that year was observed in a central Census tract in which 47.7 percent of residents were disabled, shown in dark blue on the map. Tracts with disproportionate shares of residents with disabilities were scattered throughout the city center, and with the exception of a large tract to the north of Will Rogers airport, were all located within the city's interstate beltways.

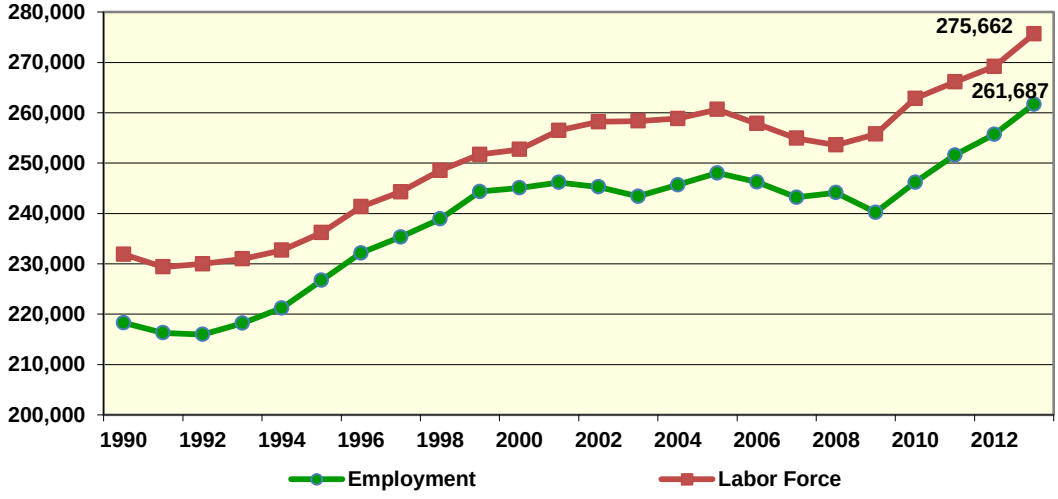
Economics

Data indicating the size and dynamics of Oklahoma City's job markets, workforce, incomes, and persons in poverty provide essential contextual background and indicate the potential buying power or other limitations of city residents when making a housing choice. A review of the city's residents in such a context shows where additional attention may be needed to address needs and challenges.

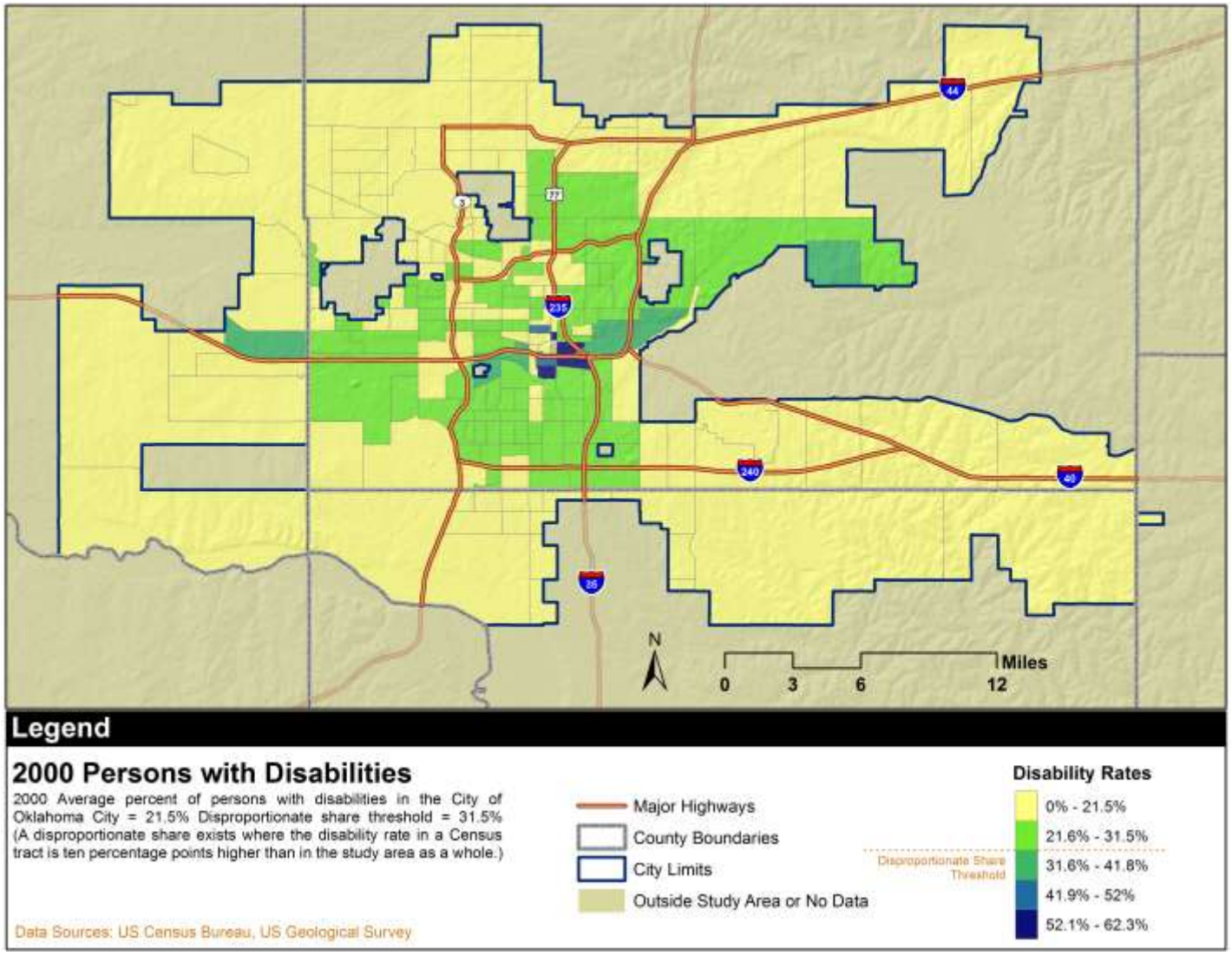
Labor Force and Employment

After dropping to 215,966 in 1992, the number of employed persons in Oklahoma City grew steadily through the end of the decade, as shown in Diagram II.1 below. The number of employed in the city stood at 244,346 in 1999, and fluctuated around that figure for the following decade, ranging from 248,046 in 2005 to 244,132 in 2008. In 2009, the number of employed in the city dropped by nearly 4,000 workers. This decline was brief, however, and employment figures began to rise in 2010, and this growth continued steadily through the end of 2013.

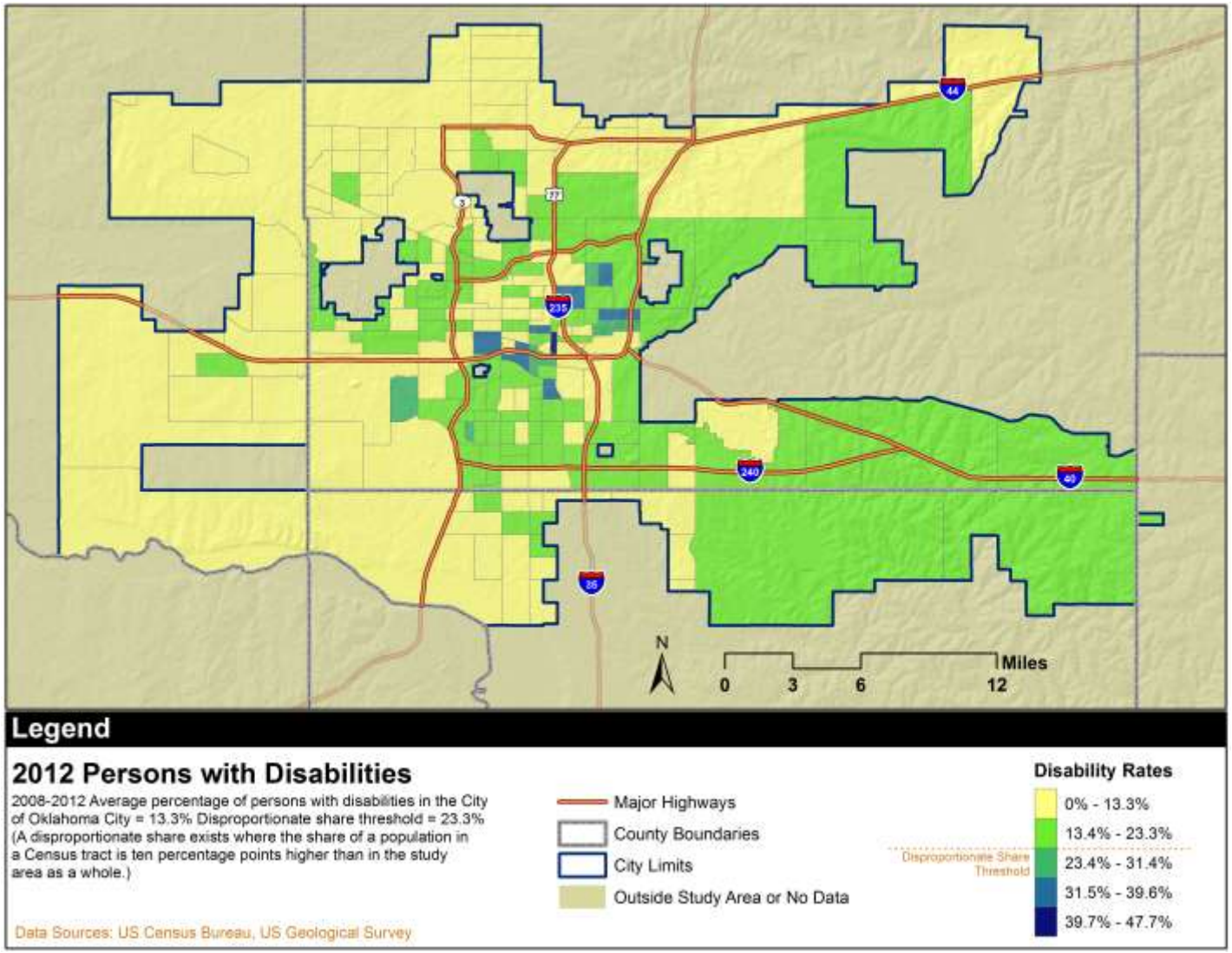
Diagram II.1
Employment and Labor Force
City of Oklahoma City
1969–2011 BEA Data



Map II.5
Population with Disabilities, 2000
City of Oklahoma City
2000 Census Data



Map II.6
Population with Disabilities, 2008-2012
City of Oklahoma City
2000 Census Data



As the number of employed fell sharply in 2009 the labor force continued to grow. The result was a marked increase in the unemployment rate, as shown in Diagram II.2 below. The unemployment rate climbed from 3.7 percent in 2008 to 6.1 percent in 2009, and this upswing continued through 2010 when the unemployment rate peaked at 6.3 percent. In the following year, the unemployment rate fell by 0.8 percentage points. This decline in unemployment continued through 2012. However, the unemployment rate edged up slightly in 2013, and stood at 5.1 percent in that year.

Diagram II.2
Unemployment Rate
City of Oklahoma City
1990–2012 BLS Data

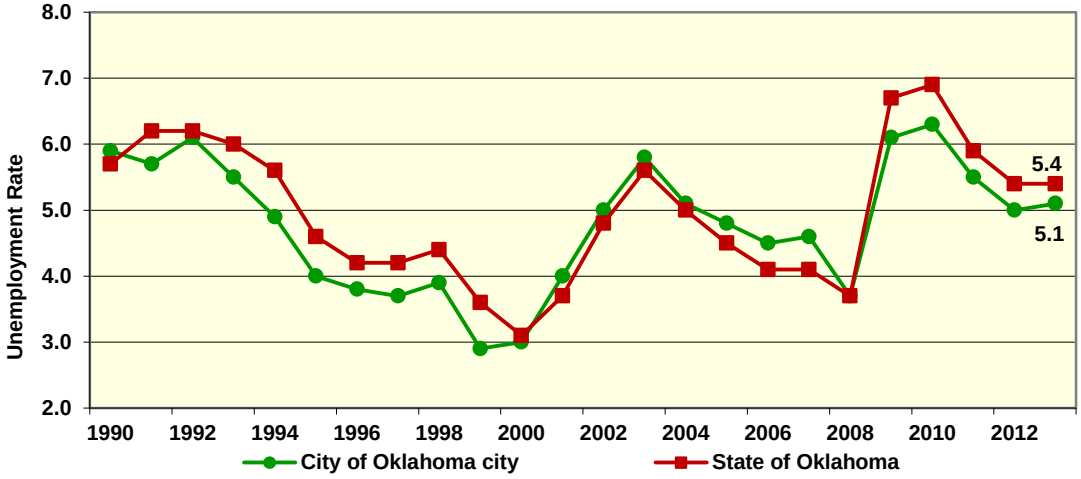
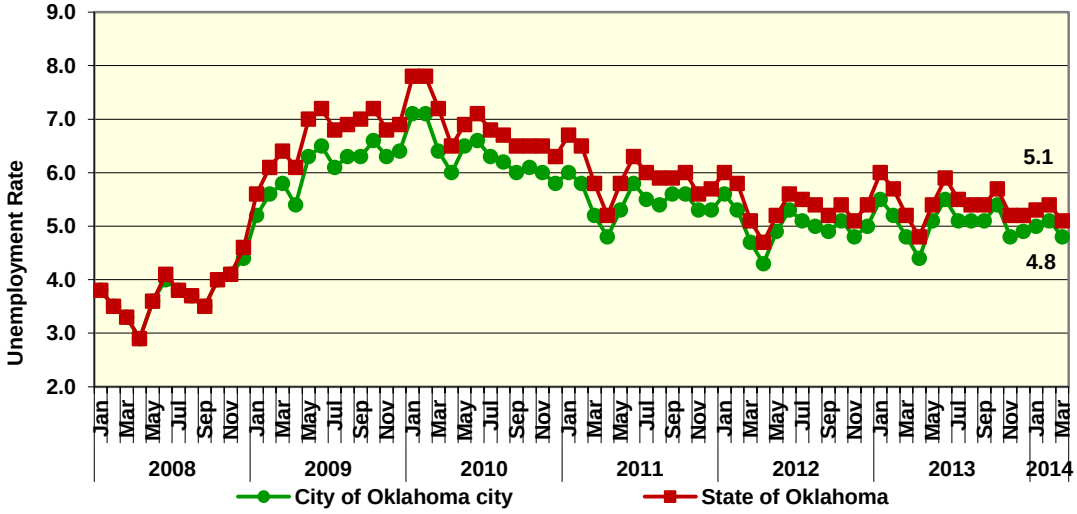


Diagram II.3 below presents monthly unemployment data from January 2008 through March 2014. These data indicate that the early months of 2010 constituted the turning point in the latest spike in unemployment. The unemployment rate in the city stood at 7.1 percent in January and February of that year, and began to fall steadily thereafter. Since the middle of 2012, the unemployment has hovered around 5 percent.

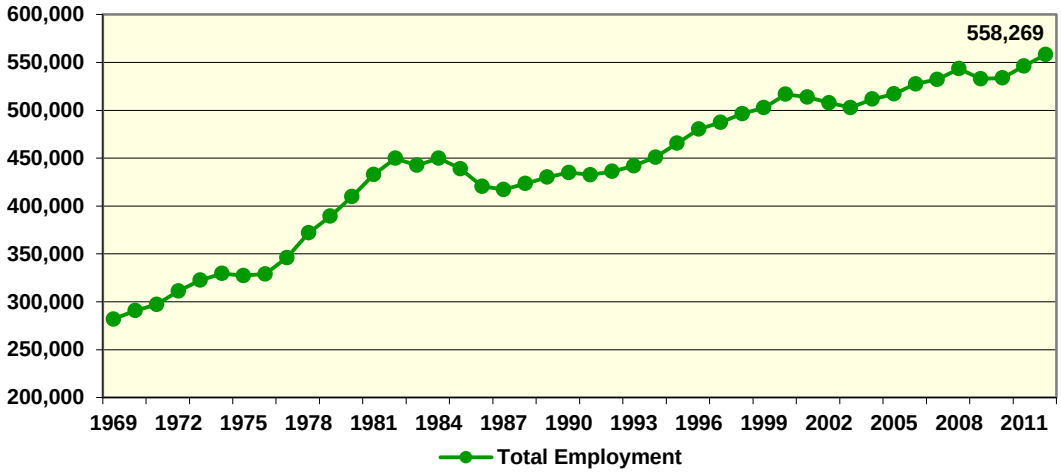
Diagram II.3
Monthly Unemployment Rate
City of Oklahoma City
2008–March 2014 BLS Data



FULL- AND PART-TIME EMPLOYMENT AND EARNINGS

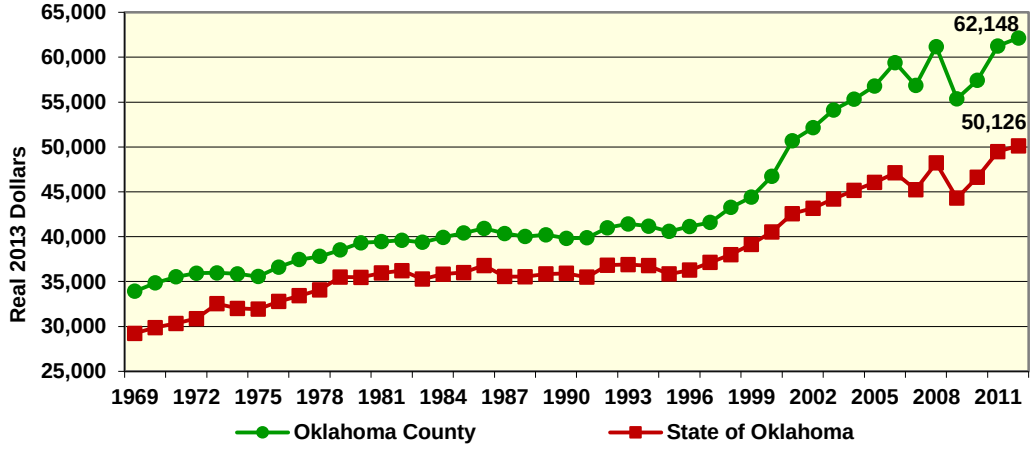
Total employment, as measured by the Bureau of Economic Analysis, refers to the total number of part-time and full-time jobs in the City of Oklahoma City. Unlike data from the BLS, people who work more than one job are counted more than once. Over the last decade, growth in total employment has generally been steady, the sole exception being the year 2009 when the number of jobs in the city fell by over 10,000. Growth resumed the following year, however, and by 2012 there were 558,269 full- and part-time jobs in the city, as shown in Diagram II.4 below.

Diagram II.4
Full- and Part-Time Employment
City of Oklahoma City
1969–2012 BEA Data



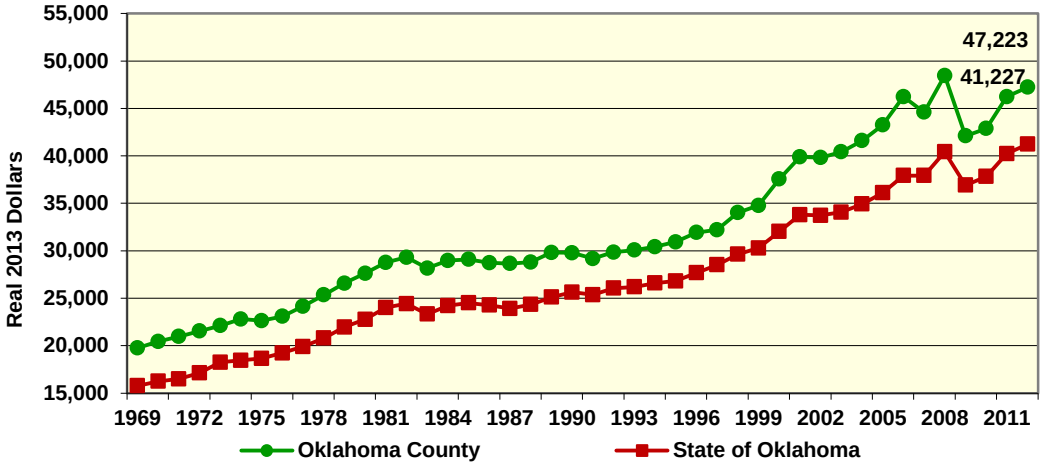
Real average earnings per job have been higher in the city than at the state level since at least 1969; however, in recent years the difference between the two has increased dramatically, as shown in Diagram II.5 below. From 2000 through 2006, real average earnings per job increased by over $12,000 in 2012 dollars. Earnings fluctuated considerably over the following three years before stabilizing in 2009. After 2009, earnings began to grow rapidly, and stood at $62,148 in 2012.

Diagram II.5
Real Average Earnings Per Job
City of Oklahoma City
1969–2012 BEA Data, 2012 Dollars



The pattern in earnings per job discussed above was reflected in yearly patterns in real average per capita income (PCI), defined as the total income in the city divided by the number of city residents. As shown in Diagram II.6 below, real PCI grew steadily from 2001 through 2006, increasing by over $6,000 during that time. As had been the case with real earnings per job, real PCI entered a period of substantial fluctuation after 2006, which lasted until 2009. After 2009, real PCI began to grow again, and stood at $47,223 in 2012.

Diagram II.6
Real Average Per Capita Income
City of Oklahoma City
1969–2012 BEA Data, 2012 Dollars



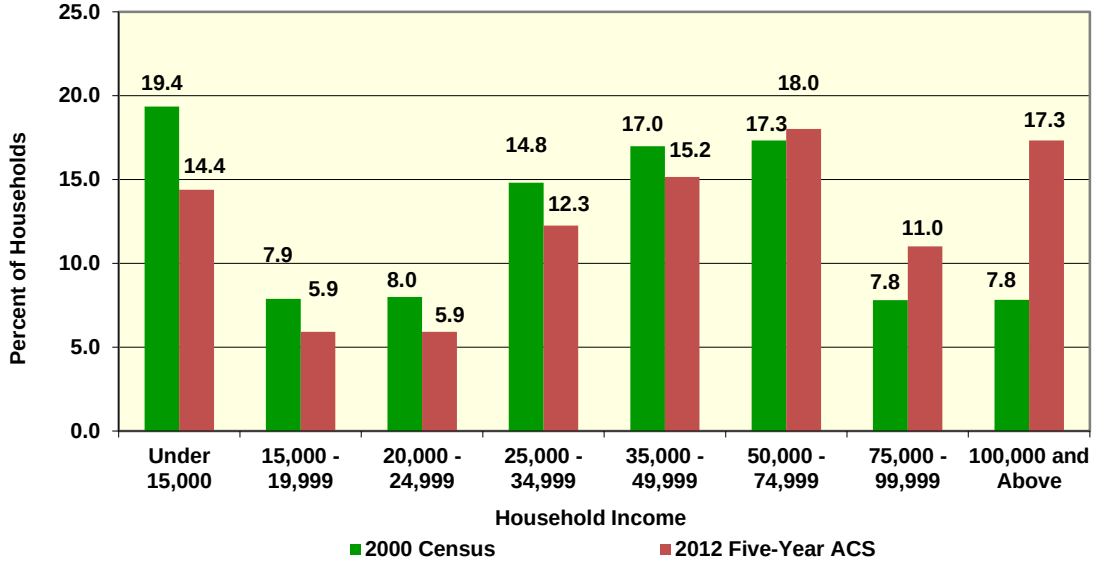
HOUSEHOLD INCOME

Overall household incomes increased in the city after 2000, according to data from the 2000 Census and 2008-2012 ACS, as shown in Table II.7 below. The shares of households in the top three income categories, or those making more than $50,000 per year, grew while the shares of households in all lower income brackets declined. In 2000, households making less than $15,000 per year accounted for the largest share of households overall at 19.4 percent. By 2012, it was households making $50,000 to $74,999 per year that made up the largest share, accounting for 18 percent of all households. This shift in household incomes is illustrated in Diagram II.7 on the following page.

Table II.7
Households by Income
City of Oklahoma City
2000 Census SF3 & 2012 Five-Year ACS Data

Income	2000 Census		2012 Five-Year ACS	
	Households	% of Total	Households	% of Total
Less than $15,000	39,581	19.4%	32,680	14.4%
$15,000 to $19,999	16,132	7.9%	13,420	5.9%
$20,000 to $24,999	16,353	8.0%	13,415	5.9%
$25,000 to $34,999	30,306	14.8%	27,810	12.3%
$35,000 to $49,999	34,729	17.0%	34,388	15.2%
$50,000 to $74,999	35,424	17.3%	40,906	18.0%
$75,000 to $99,999	15,965	7.8%	24,979	11.0%
$100,000 or More	16,003	7.8%	39,347	17.3%
Total	**204,493**	**100.0%**	**226,945**	**100.0%**

Diagram II.7
Households by Income
City of Oklahoma City
2000 Census SF3 & 2012 Five-Year ACS Data



POVERTY

The Census Bureau uses a set of income thresholds that vary by family size and composition to determine poverty status. If a family's total income is less than the threshold for its size, then that family, and every individual in it, is considered poor. The poverty thresholds do not vary geographically, but they are updated annually for inflation using the Consumer Price Index. The official poverty definition counts income before taxes and does not include capital gains and non-cash benefits such as public housing, Medicaid, and food stamps.

In spite of the shift toward a larger share of higher income households discussed above, the poverty rate in the city grew from 16.0 percent in 2000 to 17.6 percent by 2012, as shown in Table II.8 below. The poverty rate increased slightly among residents aged less than 6 years and those aged between 18 and 64.

Table II.8
Poverty by Age
City of Oklahoma City
2000 Census SF3 & 2012 Five-Year ACS Data

Age	2000 Census		2012 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	11,689	14.8%	16,341	16.3%
6 to 17	18,095	22.9%	22,361	22.3%
18 to 64	44,181	55.9%	56,804	56.5%
65 or Older	5,119	6.5%	4,969	4.9%
Total	**79,084**	**100.0%**	**100,475**	**100.0%**
Poverty Rate	**16.0%**	**.**	**17.6%**	**.**

The highest concentration of residents in poverty in 2000 was located in a Census tract in the city center, near the interchange of Interstate 235 and Interstate 40, as shown in Map II.7 on page 39. In that Census tract the poverty rate was 45.9 percent. There was one other tract near the city center in which the poverty rate exceeded the disproportionate share threshold of 26.0 percent; with the remainder located beyond the city center.

Though disproportionately high poverty rates had been limited to a few Census tracts in 2000, subsequent years saw a proliferation in the number of Census tracts with relatively high poverty rates, along with a rise in the overall poverty rate, as shown in Map II.8 on page 40. The share of households in poverty exceeded 70 percent in three central Census tracts, ranging as high as 91.4 percent. Moreover, the number of tracts in and near the city center in which the poverty rate exceeded the disproportionate share threshold increased considerably over 2000, despite the increase in that threshold by nearly two percentage points.

HOUSING

Simple counts of housing by age, type, tenure, and other characteristics form the basis for the housing stock background, suggesting the available housing in the city from which residents have to choose. Examination of households, on the other hand, shows how residents use the available housing, and shows household size and housing problems such as incomplete plumbing and/or kitchen facilities. Review of housing costs reveals the markets in which housing consumers in the city can shop, and may suggest needs for certain populations.

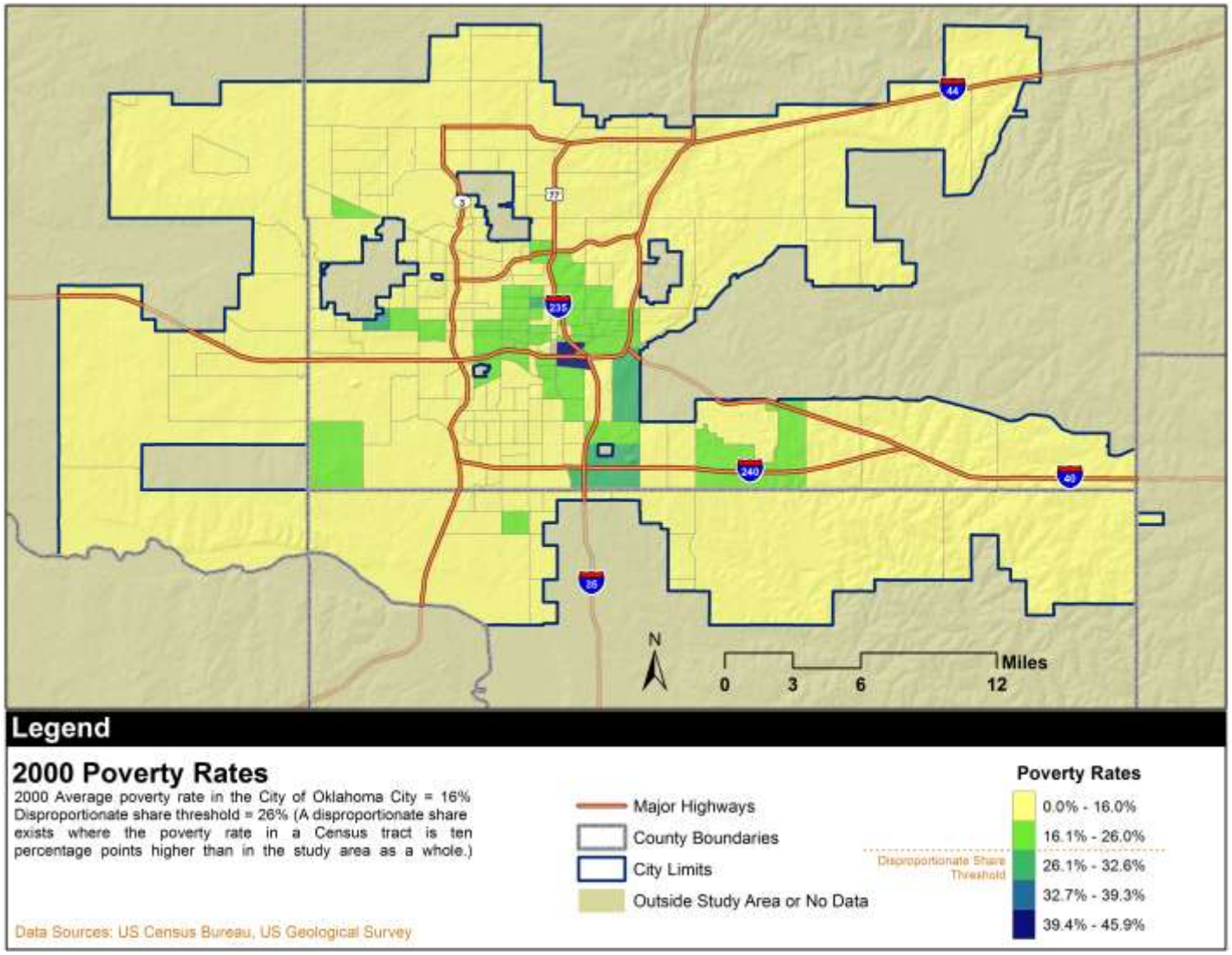
CHARACTERISTICS OF THE HOUSING STOCK

There were only minor changes in the tenure of housing units in the city between the 2000 and 2010 Censuses. As shown in Table II.9 below, occupied housing units accounted for 89.6 percent in both decennial periods. Among occupied housing units, the rate of homeownership rose slightly from 59.4 percent to 59.7 percent, with a corresponding decline in renter occupied housing. Vacant units comprised 10.4 percent in both decennial Census periods too; however, the number of these units still increased by 3,000 units over the period.

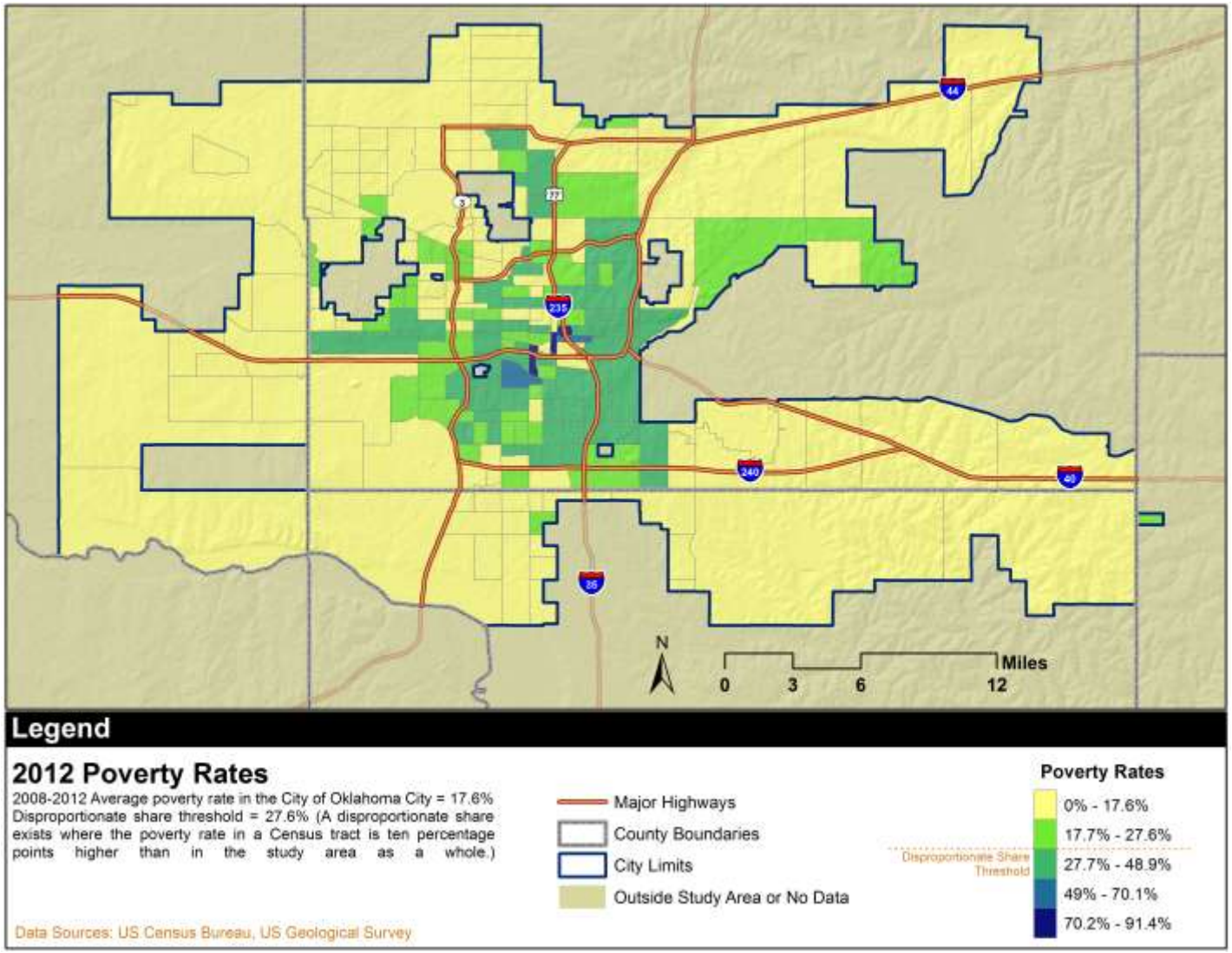
Table II.9
Housing Units by Tenure
City of Oklahoma City
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	204,434	89.6%	230,233	89.6%	12.6%
Owner-Occupied	121,528	59.4%	137,432	59.7%	13.1%
Renter-Occupied	82,906	40.6%	92,801	40.3%	11.9%
Vacant Housing Units	23,715	10.4%	26,697	10.4%	12.6%
Total Housing Units	**228,149**	**100.0%**	**256,930**	**100.0%**	**12.6%**

Map II.7
Poverty Rate by Census Tract
City of Oklahoma City
2000 Census Data



Map II.8
Poverty Rate by Census Tract
City of Oklahoma City
2012 Five-Year ACS Data



Census tracts with disproportionate shares of black and Hispanic residents tended to have relatively small shares of owner-occupied housing units, as shown in Map II.9 on the following page. Owner-occupied units accounted for 59.7 percent of all occupied housing units in the city in 2010; however, the share of owner-occupied units in almost every central Census tract was at or below that figure. Disproportionate concentrations of these units appeared almost exclusively in outlying Census tracts.

The opposite was true for rental occupied units, which tended to be concentrated in the city center, as shown in Map II.10 on page 43. The highest concentrations of rental occupied units appeared in tracts in and around the city center, where more than 83.5 percent of housing units were occupied by rental tenants. Additional tracts in which rental units accounted for more than 83.5 percent of housing units were located along major highways to the southeast, north, and northwest of the city center. Renter occupied units represented more than half of all housing units throughout most of the downtown area. Shares of renter-occupied units in outlying areas were relatively small.

VACANT HOUSING

Changes in the composition of the vacant housing stock were more pronounced than changes in the housing stock overall, even though the share of vacant units overall remained the same. As shown in Table II.10 below, the number of vacant rental units rose 5.0 percent, while the number of vacant for-sale units rose some 31.6 percent. The number of "other vacant" units increased by around 25 percent, approximately twice the rate at which the number of vacant units grew. The result was an increase of 3.1 percentage points in "other vacant" units as a share of the overall vacant housing stock.

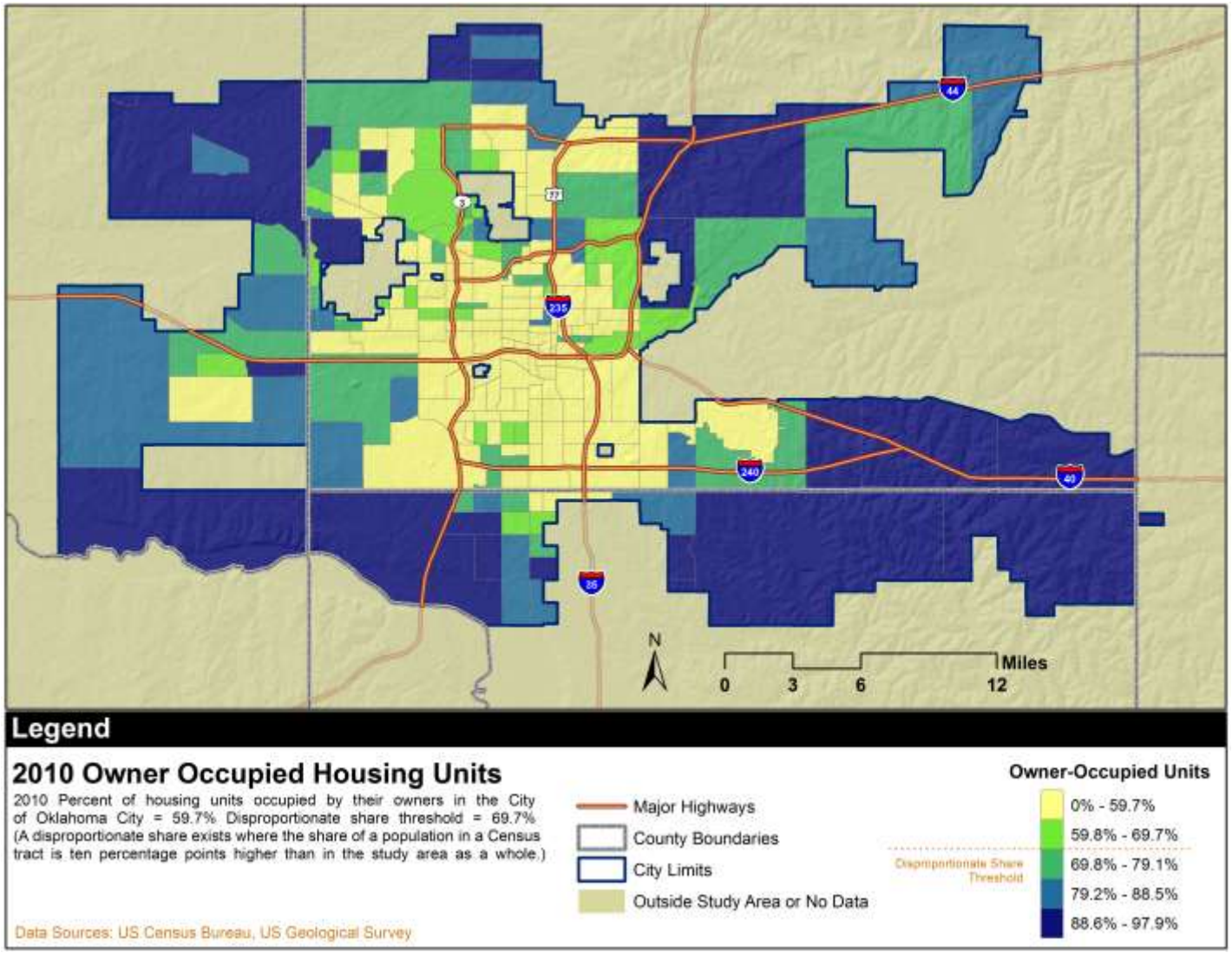
Table II.10
Disposition of Vacant Housing Units
City of Oklahoma City
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
For Rent	11,626	49.0%	12,210	45.7%	5.0%
For Sale	2,760	11.6%	3,631	13.6%	31.6%
Rented or Sold, Not Occupied	1,563	6.6%	1,352	5.1%	-13.5%
For Seasonal, Recreational, or Occasional Use	1,121	4.7%	1,176	4.4%	4.9%
For Migrant Workers	10	0.0%	36	0.1%	260.0%
Other Vacant	6,635	28.0%	8,292	31.1%	25.0%
Total	**23,715**	**100.0%**	**26,697**	**100.0%**	**12.6%**

HOUSEHOLD SIZE

The size of the average household in City of Oklahoma City increased between 2000 and 2010 as the largest households captured larger shares of all Oklahoma City households. As shown in Table II.11 on page 44, the growth rate of five and six person households more than doubled and tripled the overall growth rate, respectively. Growth in households with seven persons or more nearly quadrupled the overall rate. As a result, these households together accounted for 10.2 percent of all households in 2010, up from 8.7 percent in 2000. Meanwhile, growth in the number of households with four persons or less fell behind the overall growth rate, and the households accounted for smaller shares of all Oklahoma City households in 2010.

Map II.9
Owner-Occupied Housing Units
City of Oklahoma City
2010 Census Data



Map II.10
Renter-Occupied Housing Units
City of Oklahoma City
2010 Census Data

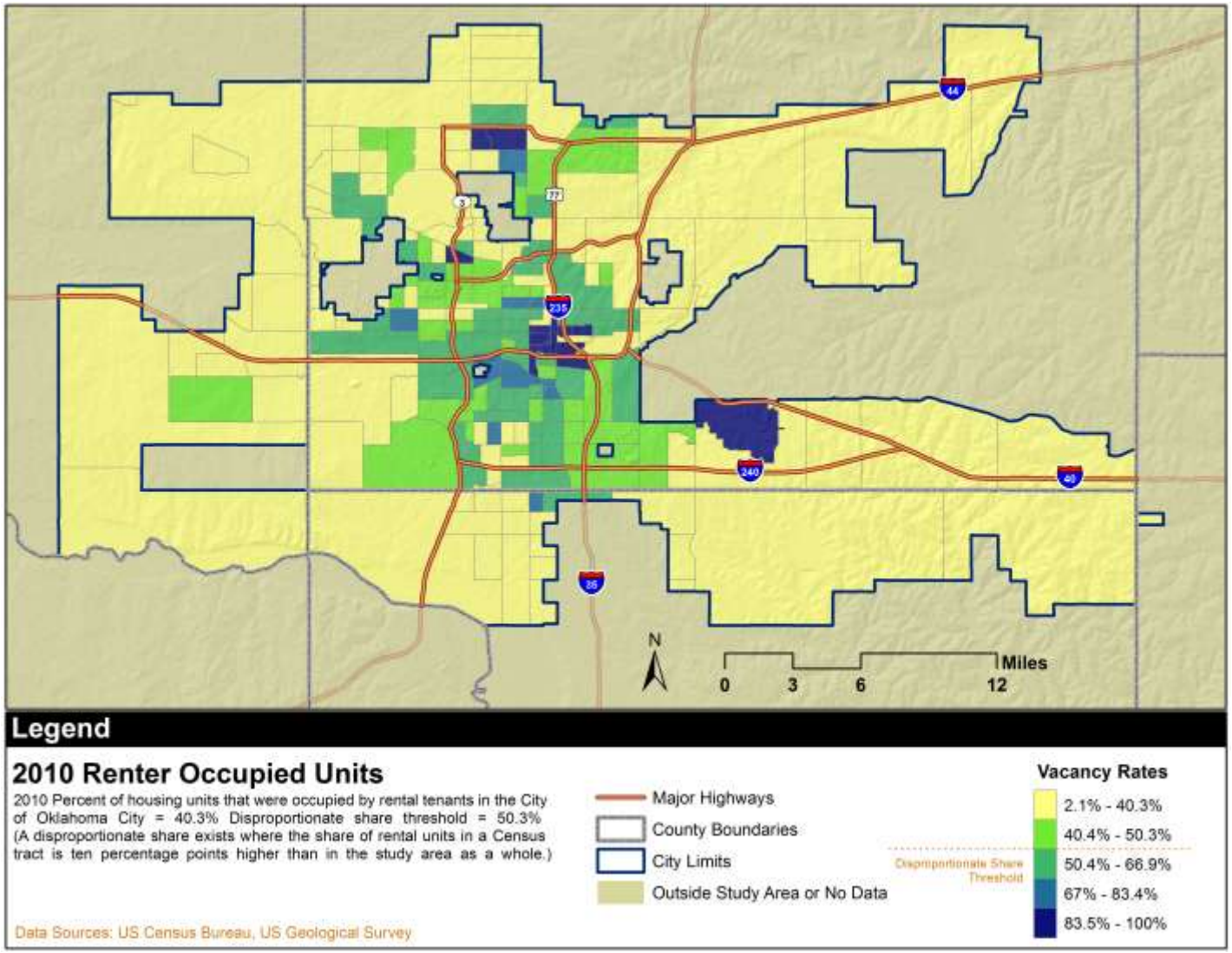


Table II.11
Households by Household Size
City of Oklahoma City
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
One Person	62,807	30.7%	70,295	30.5%	11.9%
Two Persons	66,662	32.6%	73,406	31.9%	10.1%
Three Persons	32,144	15.7%	35,166	15.3%	9.4%
Four Persons	25,023	12.2%	27,795	12.1%	11.1%
Five Persons	11,106	5.4%	14,040	6.1%	26.4%
Six Persons	4,124	2.0%	5,747	2.5%	39.4%
Seven Persons or More	2,568	1.3%	3,784	1.6%	47.4%
Total	**204,434**	**100.0%**	**230,233**	**100.0%**	**12.6%**

Data from the 2000 Census and 2008-2012 ACS also detail the types of housing units that make up the housing stock of Oklahoma City. As shown in Table II.12 below, single-family units represented the largest share of housing units in both datasets; these units accounted for 68.8 percent of all housing units in 2000, a share which had grown to 71.0 percent by 2012. All other housing types had smaller shares of the total housing stock in 2012, with tri- or four-plexes and mobile homes actually estimated to have declined in number.

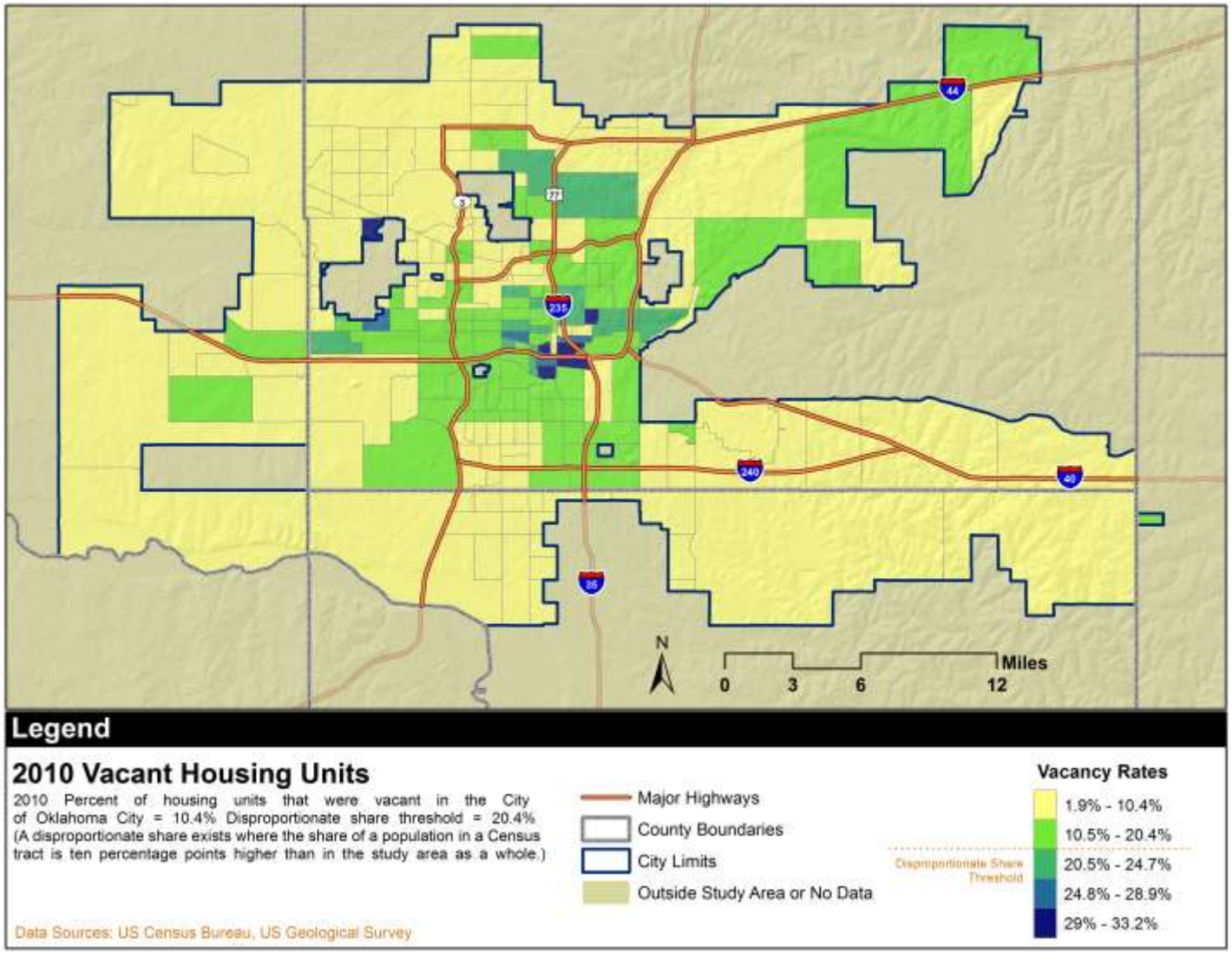
Table II.12
Housing Units by Type
City of Oklahoma City
2000 Census SF3 & 2012 Five-Year ACS Data

Unit Type	2000 Census		2012 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	157,051	68.8%	182,903	71.0%
Duplex	5,299	2.3%	5,929	2.3%
Tri- or Four-Plex	10,344	4.5%	9,215	3.6%
Apartment	46,409	20.3%	51,346	19.9%
Mobile Home	8,798	3.9%	8,057	3.1%
Boat, RV, Van, Etc.	287	0.1%	42	0.0%
Total	**228,188**	**100.0%**	**257,492**	**100.0%**

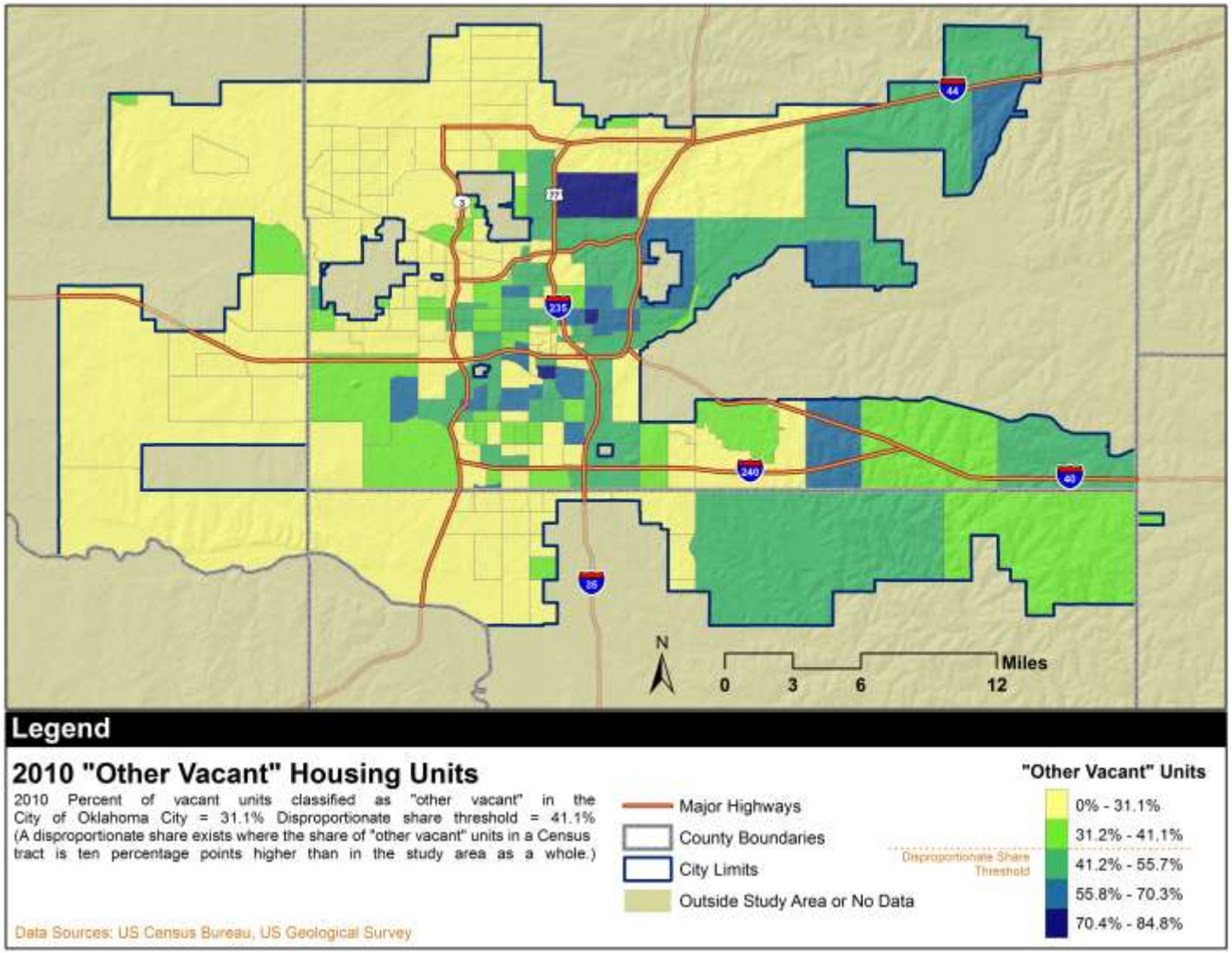
Tracts with relatively high shares of vacant housing units also tended to be clustered in and around the city center, as shown in Map II.11 on the following page. Roughly thirty percent to one third of housing units were vacant in Census tracts near Riverside and the I-235/I-40 interchange, as well as one large tract near the Wiley Post Airport. With the exception of that latter area and one tract to the south of Bethany, Census tracts in which more than a quarter of units were vacant were all located near the city center.

Tracts with relatively high concentrations of "other vacant" units also tended to be located near the city center, though this tendency was weaker than in the case of vacant units overall. "Other vacant" units can be of more concern than vacant units overall, as these units are not available to the marketplace and may create a blighting influence where they are grouped in close proximity. As shown in Map II.12 on page 46, more than 70 percent of vacant units were classified as "other vacant" in areas in or around Riverside, Pitts Park, and Musgrave. These areas all contained disproportionate shares of black or Hispanic residents in 2010.

Map II.11
Vacant Housing Units
City of Oklahoma City
2010 Census Data



Map II.12
"Other Vacant" Housing Units
City of Oklahoma City
2010 Census Data



HOUSING PROBLEMS

While the 2000 Census did not report significant details regarding the physical condition of housing units, some information can be derived from the SF3 data. These data relate to overcrowding, incomplete plumbing or kitchen facilities, and cost burdens. While these data were not collected during the 2010 Census, data were available for comparison from the 2008 to 2012 ACS averages.

Overcrowding occurs in units housing between 1 and 1.5 persons per room, while severe overcrowding occurs in units with 1.5 or more persons per room. As shown in Table II.13 below, only 2.8 percent of housing units were overcrowded in 2000, and 2.2 percent were severely overcrowded. By 2012, these shares had fallen to 2.3 and 0.6 percent respectively. According to both the 2000 Census and 2008-2012 ACS, overcrowding was a problem that impacted rental units to a greater degree than owner-occupied units.

Table II.13
Overcrowding and Severe Overcrowding
City of Oklahoma City
2000 Census SF3 & 2012 Five-Year ACS Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	118,054	97.1%	2,313	1.9%	1,235	1.0%	121,602
2012 Five-Year ACS	134,536	98.2%	2,123	1.5%	331	0.2%	136,990
Renter							
2000 Census	76,267	92.0%	3,462	4.2%	3,174	3.8%	82,903
2012 Five-Year ACS	85,839	95.4%	3,134	3.5%	982	1.1%	89,955
Total							
2000 Census	194,321	95.0%	5,775	2.8%	4,409	2.2%	204,505
2012 Five-Year ACS	220,375	97.1%	5,257	2.3%	1,313	0.6%	226,945

Incomplete plumbing or kitchen facilities are other indicators of potential housing problems. According to the Census Bureau, a housing unit is classified as lacking complete plumbing facilities when any of the following are not present: piped hot and cold water, a flush toilet, and a bathtub or shower. As shown in Table II.14 below, 0.3 percent of housing units lacked complete plumbing facilities in 2008-2012, down from 0.5 percent in 2000.

Table II.14
Households with Incomplete Plumbing Facilities
City of Oklahoma City
2000 Census SF3 & 2012 Five-Year ACS Data

Households	2000 Census	2012 Five-Year ACS
With Complete Plumbing Facilities	203,542	226,157
Lacking Complete Plumbing Facilities	963	788
Total Households	**204,505**	**226,945**
Percent Lacking	**0.5%**	**0.3%**

Likewise, a unit is categorized as deficient when any of the following are missing from the kitchen: a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator. The share of units without complete kitchen facilities rose from 0.5 to 1.0 percent between 2000 and 2012, as shown in Table II.15 on the following page. An estimated 2,169 units had incomplete kitchen facilities in 2008-2012.

Table II.15
Households with Incomplete Kitchen Facilities
City of Oklahoma City
2000 Census SF3 & 2012 Five-Year ACS Data

Households	2000 Census	2012 Five-Year ACS
With Complete Kitchen Facilities	203,392	224,776
Lacking Complete Kitchen Facilities	1,113	2,169
Total Households	**204,505**	**226,945**
Percent Lacking	**0.5%**	**1.0%**

The third type of housing problem reported in the 2000 Census was cost burden, which occurs when a household has gross housing costs that range from 30 to 49.9 percent of gross household income; severe cost burden occurs when gross housing costs represent 50 percent or more of gross household income. For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, this figure represents monthly rent plus utility charges.

The share of households that were cost-burdened grew between the 2000 Census and the 2008-2012 ACS, as shown in Table II.16 below, along with the share of households that were severely cost burdened. The share of cost burdened households, in which housing costs account for 31 to 50 percent of the household income, grew by 3.6 percentage points between 2000 and 2008-2012, and came to represent 18 percent of all households by 2012. Meanwhile, the share of severely cost-burdened households grew from 11.1 to 14.6 percent. As had been the case with overcrowded housing units, the problems of cost-burden and severe-cost burden fell more heavily on rental households than owner-occupied households. A complete version of this table with data for all households is included in Appendix D.

Table II.16
Cost Burden and Severe Cost Burden by Tenure
City of Oklahoma City
2000 Census & 2012 Five-Year ACS Data

Data Source	31%-50%		Above 50%		Total
	Households	% of Total	Households	% of Total	
Owner With a Mortgage					
2000 Census	10,497	14.2%	6,142	8.3%	73,876
2012 Five-Year ACS	17,218	18.6%	9,256	10.0%	92,623
Owner Without a Mortgage					
2000 Census	1,925	5.5%	1,150	3.3%	34,784
2012 Five-Year ACS	3,044	6.9%	2,061	4.6%	44,367
Renter					
2000 Census	15,138	18.3%	13,958	16.9%	82,669
2012 Five-Year ACS	20,515	22.8%	21,890	24.3%	89,955
Total					
2000 Census	27,560	14.4%	21,250	11.1%	191,329
2012 Five-Year ACS	40,777	18.0%	33,207	14.6%	226,945

Renters with a severe cost burden are at risk of homelessness. Cost-burdened renters who experience one financial setback often must choose between rent and food or health care for their families. Similarly, homeowners with a mortgage who have just one unforeseen financial constraint, such as temporary illness, divorce, or the loss of employment, may face foreclosure or bankruptcy. Furthermore, households that no longer have a mortgage yet still experience a severe cost burden may be unable to conduct periodic maintenance and repair of their homes,

and in turn, may contribute to a dilapidation and blight problems. All three of these situations should be of concern to policymakers and program managers.

HOUSING COSTS

The increasing prevalence of cost-burdened households in Census Bureau counts and estimates came as the median rental costs and home values grew after 2000, as shown in Table II.17 at right. In 2000, median contract rent, which includes only rental costs and excludes utilities and other fees, was $481 in current dollars. By 2012 that figure had grown to $551. The median home value in the city was $80,300 in 2000, and had grown to $131,000 by 2012.

Table II.17
Median Housing Costs
City of Oklahoma City
2000 Census SF3 & 2012 Five-Year ACS Data

Housing Cost	2000	2012
Median Contract Rent	$481	$551
Median Home Value	$80,300	$131,000

As one might expect, given the relatively high poverty rates in the city center in 2008-2012 discussed previously, median home values in that area tended to be at or below the citywide median of $131,000. As shown in Map II.13 on the following page, there were very few Census tracts in or near the city center in which the median home value exceeded the citywide median: exceptions were to be found in a line of Census tracts to the immediate north of the downtown area. Census tracts in which a large proportion of residents were black or Hispanic tended to have lower home values.

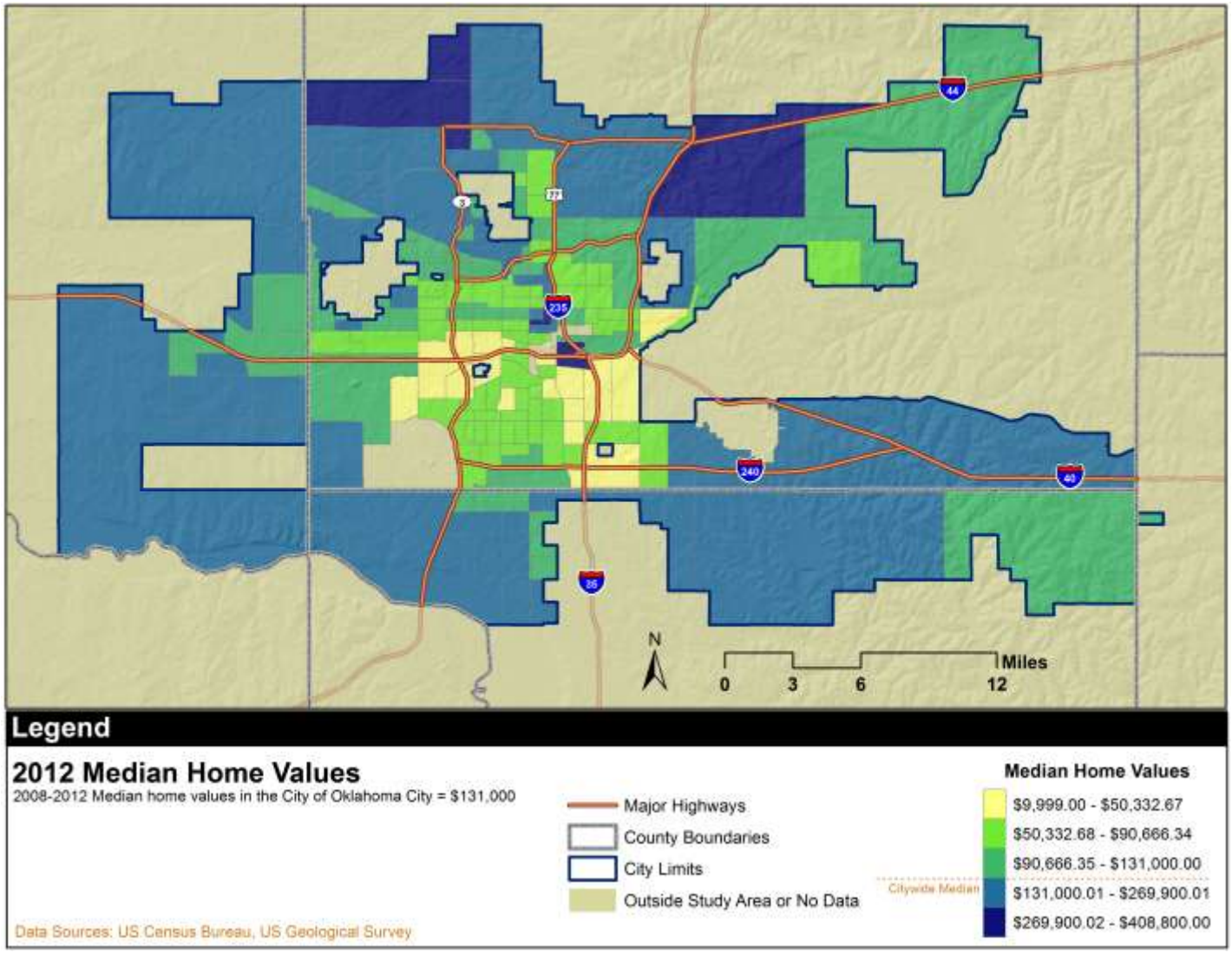
Likewise, tracts with relatively high contract rental costs were largely located in outlying Census tracts, as shown in Map II.14 on page 51, though there was a handful of central Census tracts in which median contract rent prices exceeded the citywide median of $551. Once again, it was tracts with relatively high shares of black and Hispanic residents that tended to have lower median contract rent prices.

SUMMARY

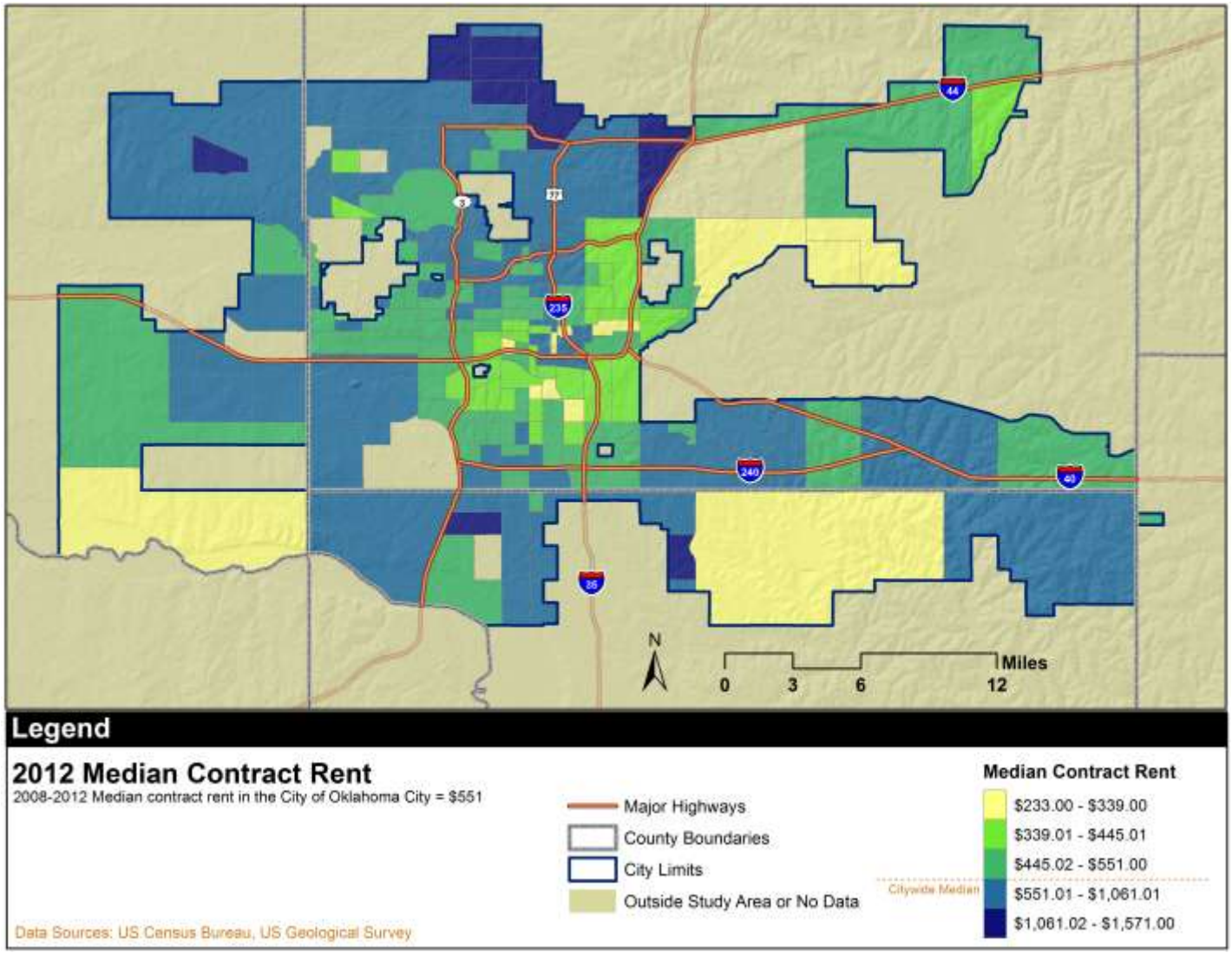
Oklahoma City has grown steadily since 2000, from a population of 506,132 to an estimated 610,613 in 2013. Between 2000 and 2010, the city grew by an estimated 14.6 percent, much of this growth driven by an increase in the number of residents aged less than five years, 25 to 34 years, and 55 to 64 years. These groups; which grew at a rate that was above average for the population as a whole, accounted for a larger share of city residents in 2010 than they had in 2000. All other age cohorts declined as a share of the total population, but on the whole the proportions of residents in each age group remained similar in 2010 to what they had been in 2000.

A more marked shift was observed in the city's racial and ethnic composition. White residents, who represented 68.4 percent of the population in 2000, came to account for 62.7 percent of the population in 2010. This decline of nearly six percentage points is explained largely by growth in the number of residents who identified themselves as "other" or belonging to two or more racial groups; the shares of black residents changed very little between the two Censuses, as growth in that population was only slightly less than the average rate of growth. The Hispanic population, by contrast, grew considerably between 2000 and 2010, nearly doubling in number. Having represented 10.1 percent of the population in 2000, Hispanic residents came to account for 17.2 percent of the population in 2010.

Map II.13
Median Home Values
City of Oklahoma City
2012 Five-Year ACS Data



Map II.14
Median Contract Rent
City of Oklahoma City
2012 Five-Year ACS Data



Changes in the racial and ethnic composition of the city described above were reflected in changes to the geographic distribution of the black and Hispanic populations. The geographic distribution of the black population changed little as a share of the city's overall population, and black residents remained disproportionately concentrated in Census tracts to the east and northeast of the city center. As the Hispanic population grew in absolute numbers and as a share of the population, the number of Census tracts with high concentrations of Hispanic residents grew. However, such tracts tended to be located next to tracts with relatively high shares of Hispanic residents in 2000, which were clustered to the southwest and west of the downtown area.

Residents with disabilities accounted for 21.5 percent of the population in 2000, and were highly concentrated in Census tracts near the interchange of Interstate 40 and Interstate 235 in the city center. In 2008-2012, an estimated 13.3 percent of the population was living with some form of disability[16], and these residents remained concentrated in central Census tracts, including tracts to the east and south of the city center.

Though growth in the overall population was steady between 2000 and 2013, growth in the labor force and the number of employed has been subject to some fluctuation, according to data from the Bureau of Labor Statistics (BLS). The labor force and number of employed both declined from 2005 through 2007; the number of employed persons increased slightly in 2008, but fell dramatically in 2009. By contrast, the labor force has grown steadily since 2008, and these two trends together contributed to a spike in the unemployment rate that continued through 2010. In that year, 6.3 percent of the city's workers were out of a job. However, monthly unemployment data shows that the subsequent decline in the unemployment rate began in March of 2010, and continued through 2012. The unemployment rate ticked up slightly in 2012, and stood at 5.1 percent in that year.

After 2000, the number of full- and part-time jobs in the city declined by 14,000 through 2003 before entering a period of growth that lasted until 2008. After 2008, the number of jobs in the city fell by over 10,000. Growth in total employment resumed the following year. Real average earnings and real per capita income have both grown since 1995, though both showed substantial yearly fluctuation between 2006 and 2010. Since 2010, growth in earnings and incomes has been steady. Changes in real earnings and income are reflected by changes in household incomes between 2000 and 2012, during which time the share of households making less than $50,000 in current dollars fell while the share of households making $50,000 and over grew.

In spite of the fact that incomes in the city grew by several measures, the poverty rate also increased from 16 percent in 2000 to 17.6 percent in 2012. There were only a few Census tracts with disproportionate shares of poverty scattered throughout the city center in 2000. Tracts with above-average poverty rates were more common and widely distributed in the city center. By 2012, the number of tracts with above-average shares of poverty had grown considerably, and disproportionate shares of poverty were observed in Census tracts throughout the city center.

[16] Note: The Census Bureau substantially changed the part of the ACS questionnaire pertaining to disabilities in 2008. For this reason, direct comparisons between 2000 Census counts and post-2008 ACS estimates are discouraged. Thus, it would not be correct to conclude, based on these data, that the share of residents with disabilities fell from 21.5 percent to 13.3 percent, since different measures were employed in each dataset.

The composition of the city's housing stock changed very little between the two decennial Census counts: 89.6 percent of housing units were occupied in both years. Among occupied units, nearly 60 percent were owner-occupied in both years. Owner-occupied units were concentrated in peripheral Census tracts and were largely absent from the city center. By contrast, rental units tended to be concentrated in the city center, particularly in the downtown area and areas to the northeast and southwest of the downtown area. Vacant units, which accounted for 10.4 percent of the overall housing stock in 2000 and 2010, were concentrated in central tracts near the Interstate 235-Interstate 40 interchange. Units classified as "other vacant" were concentrated in Census tracts to the northeast and southwest of the downtown area.

The Census Bureau publishes data on additional housing problems, including overcrowding, incomplete plumbing and kitchen facilities, and cost-burdening. The share of housing units that were overcrowded; or those that had more than one resident per room; fell from 5 percent to less than 3 percent between 2000 and 2012. The share of housing units with incomplete plumbing facilities also fell, from 0.5 to 0.3 percent of all housing units. The number of units with incomplete kitchen facilities increased, but still only accounted for one percent of housing units in 2012. Cost-burdening was a more pervasive problem: the share of city households that were paying more than 30 percent of their incomes toward housing costs grew from 25.5 to 32.6 percent, with this problem falling more heavily on renters than on homeowners, as did the problem of overcrowding.

Housing costs also increased between Census counts. Median contract rent, which includes the cost of rent and excludes additional charges, rose from $481 to $551. Similarly, median home values rose from $80,300 to $131,000 during the same time period. Census tracts with relatively high housing costs tended to be located in peripheral Census tracts. However, there were central Census tracts with relatively high housing costs, including the tract surrounding the interchange of Interstate 235 and Interstate 40.

SECTION III. FAIR HOUSING LAW, STUDY, AND CASE REVIEW

As part of the AI process, existing fair housing laws, studies, cases, and other relevant materials were reviewed on a national and local scale. Results of this review are presented below.

FAIR HOUSING LAWS

FEDERAL FAIR HOUSING LAWS

Federal laws provide the backbone for U.S. fair housing regulations. While some laws have been previously discussed in this report, a brief list of laws related to fair housing, as defined on the U.S. Department of Housing and Urban Development's (HUD's) website, is presented below:

> *Fair Housing Act* Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and persons securing custody of children under the age of 18), and handicap (disability).[17]
>
> Title VIII was amended in 1988 (effective March 12, 1989) by the *Fair Housing Amendments Act* . . . In connection with prohibitions on discrimination against individuals with disabilities, the Act contains design and construction accessibility provisions for certain new multi-family dwellings developed for first occupancy on or after March 13, 1991.[18]
>
> *Title VI of the Civil Rights Act of 1964.* Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance.
>
> *Section 504 of the Rehabilitation Act of 1973* Section 504 prohibits discrimination based on disability in any program or activity receiving federal financial assistance.
>
> *Section 109 of the Housing and Community Development Act of 1974* Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs and activities receiving financial assistance from HUD's Community Development and Block Grant Program.
>
> *Title II of the Americans with Disabilities Act of 1990.* Title II prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

[17] "HUD Fair Housing Laws and Presidential Executive Orders." http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/FHLaws
[18] "Title VIII: Fair Housing and Equal Opportunity." http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/progdesc/title8

Architectural Barriers Act of 1968 The Architectural Barriers Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 be accessible to and useable by handicapped persons.

Age Discrimination Act of 1975 The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.

Title IX of the Education Amendments Act of 1972 Title IX prohibits discrimination on the basis of sex in education programs or activities that receive federal financial assistance.[19]

STATE AND LOCAL FAIR HOUSING LAWS

In addition to federal law, Oklahoma City residents are protected by anti-discrimination laws at the state and local level. State law recognizes the same protected class designations as the federal Fair Housing Act and extends an additional protection based on age. Oklahoma City's Code of Ordinances protects city residents against discrimination in the housing market on the basis of race, color, religion, sex, creed, ancestry, or national origin, but it does not include protections based on familial status, disability, or age.[20]

FAIR HOUSING STUDIES

NATIONAL FAIR HOUSING STUDIES

In 2000, HUD released a publication entitled "Discrimination in Metropolitan Housing Markets," which measured the prevalence of housing discrimination based on race and ethnicity in the U.S. This was the third nationwide effort to measure discrimination against minority home seekers since 1977, conducted in three phases.

1. *Phase 1 – Black and Hispanic Populations*

   The study, based on 4,600 paired tests in 23 metropolitan cities in the U.S., found large decreases in the levels of discrimination against black and Hispanic home seekers between 1989 and 2000. In the rental markets, a moderate decrease was seen in discrimination toward black individuals, who experienced adverse treatment more often than white individuals, whereas the Hispanic population was more likely to face discrimination in the rental markets than its black and white counterparts. Many black and Hispanic home seekers were told that units were unavailable, although the same units were available to white home seekers, and the black and Hispanic populations were also shown and told about fewer units. In addition, Hispanic individuals were more likely in 2000 than in 1989 to be quoted a higher rent than white individuals who sought to rent the same unit.

[19] "HUD Fair Housing Laws and Presidential Executive Orders."
[20] Oklahoma City Code of Ordinance §25-36-46

2. *Phase 2 – Asian and Pacific Islander Populations*

   This study, conducted in 2000 and 2001 and based on 889 paired tests in 11 metropolitan areas in the U.S., showed that Asian and Pacific Islander individuals who sought to rent a unit experienced adverse treatment compared to white individuals in 21.5 percent of tests, which was similar to the rate black and Hispanic individuals saw. The study also showed that Asian and Pacific Islander prospective homebuyers experienced adverse treatment compared to white prospective homebuyers 20.4 percent of the time, with discrimination occurring in the availability of housing, inspections, assistance with financing, and encouragement by agents.

3. *Phase 3 – American Indian Population*

   The last phase of HUD's nationwide effort to measure housing discrimination involved estimating the level of discrimination experienced by American Indian individuals in their search for housing in metropolitan areas across Minnesota, Montana, and Mississippi. The findings showed that the American Indian population experienced adverse treatments compared to white individuals in 28.5 percent of rental tests. White individuals were consistently told about advertised units, similar units, and more units than American Indian individuals with similar qualifications. The high level of discrimination experienced by the American Indian population in these areas surpassed rates seen by Hispanic, black, and Asian individuals in the metropolitan rental markets nationwide.[21]

In April 2002, HUD released a national study that assessed public awareness of and support for fair housing law titled *How Much Do We Know?: Public Awareness of the Nation's Fair Housing Laws*. The study found that only 50 percent of the population was able to identify most scenarios describing illegal conduct. In addition, 14 percent of the nationwide survey's adult participants believed that they had experienced some form of housing discrimination in their lifetime. However, only 17 percent of those who had experienced housing discrimination had taken action to resolve the issue, such as filing a fair housing complaint. Finally, two-thirds of all respondents said that they would vote for a fair housing law.[22]

As a follow-up, HUD later released a study in February 2006 called *Do We Know More Now?: Trends in Public Knowledge, Support and Use of Fair Housing Law*. One aim of the study was to determine whether a nationwide media campaign had proven effective in increasing the public's awareness of housing discrimination, and another goal was to determine the public's desire to report such discrimination. Unfortunately, the study found that overall public knowledge of fair housing law did not improve between 2000 and 2005. As before, just half of the public knew the law regarding six or more illegal housing activities. The report showed that 17 percent of the study's adult participants experienced discrimination when seeking housing; however, after reviewing descriptions of the perceived discrimination, it was determined that only about 8 percent of the situations might be covered by the Fair Housing Act. Four out of five individuals who felt they had been discriminated against did not file a fair housing complaint, indicating that they felt it "wasn't worth it" or that it "wouldn't have helped." Others

[21] "Discrimination in Metropolitan Housing Markets: National Results from Phase 1, Phase 2, and Phase 3 of the Housing Discrimination Study (HDS)." http://www.huduser.org/portal/publications/hsgfin/hds.html

[22] U.S. Department of Housing and Urban Development, Office of Policy Development and Research. *How Much Do We Know?: Public Awareness of the Nation's Fair Housing Laws*. April 2002. http://www.huduser.org/portal/publications/fairhsg/hmwk.html

did not know where to complain, assumed it would cost too much, were too busy, or feared retaliation. One positive finding of the survey was that public support for fair housing law increased from 66 percent in 2000 to 73 percent in 2005.[23]

In 2004, the U.S. General Accounting Office's (GAO) released a report titled *Fair Housing: Opportunities to Improve HUD's Oversight and Management of the Enforcement Process*. The GAO report found that between 1996 and 2003, the median number of days required to complete fair housing complaint investigations was 259 for HUD's Fair Housing and Equal Opportunity Offices and 195 for Fair Housing Assistance Program (FHAP) agencies, far above the 100-day mandate. However, the report did find a higher percentage of investigations completed within that time limit. The GAO report also identified the following trends between 1996 and 2003:

- The number of fair housing complaints filed each year steadily increased since 1998. An increasing proportion of grievances alleged discrimination based on disability and a declining proportion alleged discrimination based on race, although race was still the most cited basis of housing discrimination;
- FHAP agencies conducted more fair housing investigations than Fair Housing and Equal Opportunity (FHEO) agencies over the eight-year period. The total number of investigations completed each year increased slightly after declining in 1997 and 1998; and
- Over this time period, an increasing percentage of investigations closed without finding reasonable cause to believe discrimination occurred. However, a declining percentage of investigations were resolved by the parties themselves or with help from FHEO or FHAP agencies.[24]

In 2006, the University of Southern California and Oregon State University collaborated to study rental discrimination and race. The universities responded to 1,115 advertisements regarding apartment vacancies in Los Angeles State and signed the bottom of each email with Tyrell Jackson, a traditionally black name; Patrick McDougall, a traditionally white name; or Said Al-Rahman, a traditionally Arab name. Analysis indicated that individuals who were perceived as black were four times more likely to be discouraged from viewing an apartment than persons perceived as white, and individuals considered to be Arab were three times more likely to be discouraged from viewing an apartment than individuals who appeared white. The analysis also noted that applicants perceived as black were more likely to receive negative responses, such as the apartment was no longer available for market rate or above market rate apartments. For example, only an email signed Tyrell Jackson received a reply that reiterated the apartment cost to ensure the apartment was within the applicant's price range. The study also analyzed the responses from private property owners versus corporate property owners, but found no statistical difference in the way the two groups responded to applicants of different races.[25]

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[23] U.S. Department of Housing and Urban Development, Office of Policy Development and Research. *Do We Know More Now?: Trends in Public Knowledge, Support and Use of Fair Housing Law*. February 2006. http://www.huduser.org/portal/publications/hsgfin/FairHsngSurvey.html

[24] U.S. General Accounting Office. "Fair Housing: Opportunities to Improve HUD's Oversight and Management of the Enforcement Process." April 2004. http://gao.gov/products/GAO-04-463

[25] Carpusor, Adrian and William Loges. "Rental Discrimination and Ethnicity in Names." *Journal of Applied Social Psychology* 36(4).

Released by the Poverty & Race Research Action Council in January 2008, *Residential Segregation and Housing Discrimination in the United States* asserts that many current governmental efforts to further fair housing actually result in furthering unfair housing practices across the U.S. This article suggests that fair housing efforts can cause residential segregation. For example, if the majority of public housing residents are non-white and most public housing accommodations are grouped in the same Census tracts, residential segregation is resultant. Similarly, many Section 8 voucher holders are racial or ethnic minorities, and most housing that accepts Section 8 vouchers is grouped in selected areas, which again results in residential segregation. The report offers recommendations to curb such residential segregation, including dispersing public housing developments throughout cities and communities and providing greater incentives for landlords with several properties to accept the vouchers.[26]

Published in 2009 by the National Fair Housing Alliance, *For Rent: No Kids!: How Internet Housing Advertisements Perpetuate Discrimination* presented research on the prevalence of discriminatory housing advertisements on popular websites such as Craigslist. According to the article, while newspapers are prohibited from publishing discriminatory housing advertisements, no such law exists for websites like Craigslist, as they are considered interactive internet providers rather than publishers of content. As such, they are not held to the same legal standards as newspapers. While individual landlords who post discriminatory advertisements may be held responsible, there are no such standards for companies like Craigslist that post the discriminatory advertisements. Newspapers and other publishers of content are required to screen the advertisements they accept for publishing for content that could be seen as discriminatory. This may include phrases like "no children" or "Christian only," which violate provisions of the Fair Housing Act that state families with children and religious individuals are federally protected groups.[27]

In May 2010, the National Fair Housing Alliance published a fair housing trends report, *A Step in the Right Direction,* which indicated that recent years have demonstrated forward movement in furthering fair housing. The report began with a commendation of HUD's federal enforcement of fair housing law and noted the agency's willingness to challenge local jurisdictions that failed to affirmatively further fair housing. In response to the recent foreclosure crisis, many credit institutions have implemented tactics to reduce risk. However, this report suggests that policies that tighten credit markets, such as requiring larger cash reserves, higher down payments, and better credit scores, may disproportionally affect lending options for communities of color and women. *A Step in the Right Direction* concludes with examples of ways in which the fair housing situation could be further improved, including addressing discriminatory internet advertisements and adding gender identity, sexual orientation, and source of income as federally protected classes.[28]

The positive note that the NFHA struck in its 2010 report carried over into the following year's *The Big Picture: How Fair Housing Organizations Challenge Systemic and Institutionalized Discrimination*, published by the Alliance in April of 2011. This report began by noting an encouraging downward trend in the proportion of individuals in large metropolitan areas living

[26] U.S. Housing Scholars and Research and Advocacy Organizations. *Residential Segregation and Housing Discrimination in the United States*. January 2008. http://prrac.org/pdf/FinalCERDHousingDiscriminationReport.pdf
[27] National Fair Housing Alliance. *For Rent: No Kids!: How Internet Housing Advertisements Perpetuate Discrimination*. August 2009. http://www.nationalfairhousing.org/LinkClick.aspx?fileticket=zgbukJP2rMM%3D&tabid=2510&mid=8347
[28] National Fair Housing Alliance. *A Step in the Right Direction: 2010 Fair Housing Trends Report*. May 2010. http://www.nationalfairhousing.org/Portals/33/Fair%20Housing%20Trends%20Report%202010.pdf

in segregation, which had dropped from 69 to 65 percent between 2000 and 2010, according to census data from 2010. The report also highlighted the work of fair housing organizations to combat systemic and institutionalized discrimination produced by exclusionary zoning, NIMBYism, the dual credit market, and other fair housing challenges, often on limited budgets and with limited personnel. The NFHA closed its 2011 report by praising the work of private fair housing organizations while underscoring the need for continued work.[29]

The 2012 report from the NFHA focused on issues of fair housing in the context of the shifting demographic composition of the United States, where the white population is projected to no longer represent a majority of residents within thirty years. The report discussed encouraging signals from HUD and the Justice Department, who have "increased their efforts and announced landmark cases of mortgage lending, zoning, and other issues that get to the heart of the [Fair Housing] Act: promoting diverse and inclusive communities[30]." The report also highlights a new arena for discrimination in housing, which has emerged as a result of the massive level of foreclosures in the country in recent years: uneven maintenance of Real Estate Owned (REO) properties in white and minority areas. In concluding, the report hails the creation of the Consumer Financial Protection Bureau as a new ally for fair housing and equal opportunity.[31]

The 2013 trends report from the NFHA outlines an ambitious policy goal: expansion of the Fair Housing Act to prohibit discrimination based on source of income, sexual orientation, gender identity, and marital status. The report relates that cases of housing discrimination in general increased between 2011 and 2012, and that complaints based on non-protected statuses (source of income, etc.) were included in that upward trend. In spite of this, only 12 states include protections based on source of income, 21 states prohibit discrimination based on sexual orientation, 16 states protect against discrimination based on gender identity, and 22 states offer protections based on marital status (the District of Columbia also extends protections on all of these bases). In concluding the report, the NFHA advocates the modernization and expansion of the FHA to bring the protection of individuals based on source of income, sexual orientation, gender identity, and marital status within its compass.

FAIR HOUSING CASES

NATIONAL FAIR HOUSING CASES

As noted in the introduction to this report, provisions to affirmatively further fair housing are long-standing components of HUD's Housing and Community Development programs. In fact, in 1970, Shannon v. HUD challenged the development of a subsidized low-income housing project in an urban renewal area of Philadelphia that was racially and economically integrated. Under the Fair Housing Act, federal funding for housing must further integrate community development as part of furthering fair housing, but the plaintiffs in the Shannon case claimed that the development would create segregation and destroy the existing balance of the neighborhood. As a result of the case, HUD was required to develop a system to consider the

[29] *The Big Picture: How Fair Housing Organizations Challenge Systemic and Institutionalized Discrimination.* National Fair Housing Alliance 2011 Fair Housing Trends Report. 29 April 2011.
http://www.nationalfairhousing.org/LinkClick.aspx?fileticket=SbZH3pTEZhs%3d&tabid=3917&mid=5321
[30] http://www.nationalfairhousing.org/LinkClick.aspx?fileticket=GBv0ZVJp6Gg%3d&tabid=3917&mid=5321
[31] *Ibid.*

racial and socio-economic impacts of their projects.[32] The specifics of the system were not decided upon by the court, but HUD was encouraged to consider the racial composition and income distribution of neighborhoods, racial effects of local regulations, and practices of local authorities.[33] The Shannon case gave entitlement jurisdictions the responsibility of considering the segregation effects of publicly-funded housing projects on their communities as they affirmatively further fair housing.

More recently, in a landmark fraud case, Westchester County, New York, was ordered to pay more than $50 million to resolve allegations of misusing federal funds for public housing projects and falsely claiming their certification of furthering fair housing. The lawsuit, which was filed in 2007 by an anti-discrimination center, alleged that the County failed to reduce racial segregation of public housing projects in larger cities within the County and to provide affordable housing options in its suburbs. The County had accepted more than $50 million from HUD between 2000 and 2006 with promises of addressing these problems. In a summary judgment in February 2009, a judge ruled that the County did not properly factor in race as an impediment to fair housing and that the County did not accurately represent its efforts of integration in its AI. In the settlement, Westchester County was forced to pay more than $30 million to the federal government, with roughly $20 million eligible to return to the County to aid in public housing projects. The County was also ordered set aside $20 million to build public housing units in suburbs and areas with mostly white populations, and to promote legislation "currently before the Board of Legislators to ban 'source-of-income' discrimination in housing (§33(g))".[34]

In complying with the latter requirement, the County Executive's actions were limited to sending five letters to various fair housing advocates, encouraging them to continue their advocacy, and one letter to the Board of Legislators expressing support for the legislation. This bill failed to pass during the 2009 legislative session, and a similar bill was taken up during the 2010 session. In the meantime, Westchester voters elected Rob Astorino to the position of County Executive. Astorino declined to promote the source-of-income legislation before the Board, and when a weakened version of the bill passed in early 2010, he vetoed it. Finding that Westchester had failed to affirmatively further fair housing in the manner agreed upon in the earlier settlement, HUD rejected the County's AFFH certification and discontinued federal funding. As of April 2013, HUD's decision had been upheld through several rounds of appeals by the County[35]. The ramifications of this case are expected to affect entitlement communities across the nation; activities taken to affirmatively further fair housing will likely be held to higher levels of scrutiny to ensure that federal funds are being spent to promote fair housing and affirmatively further fair housing.

In 2008, $3 billion of federal disaster aid was allotted to the Texas state government to provide relief from damage caused by hurricanes Ike and Dolly. These storms ravaged homes in coastal communities, many of which were owned by low-income families that could not afford to rebuild. However, instead of directing the federal funds to the areas most affected by the storms, the state spread funds across Texas and let local planning agencies spend at will. In

[32] U.S. HUD. *39 Steps Toward Fair Housing*. http://www.hud.gov/offices/fheo/39steps.pdf
[33] Orfield, Myron. "Racial Integration and Community Revitalization: Applying the Fair Housing Act to the Low Income Housing Tax Credit." *Vanderbilt Law Review*, November 2005.
[34] http://www.hud.gov/content/releases/settlement-westchester.pdf
[35] *United States v Westchester Ge0gr@phy* 712 F.3d 761 2013 U.S. App.

reaction to this, two fair housing agencies in the state filed a complaint with HUD stating that the plan violated fair housing laws as well as federal aid requirements that specify half of the funds be directed to lower-income persons. In light of the complaint, HUD withheld $1.7 billion in CDBG funds until the case was resolved. A settlement was reached in June 2010; the state was required to redirect 55 percent of the amount of the original funds to aid poorer families that lost their homes. The state was also asked to rebuild public housing units that were destroyed by the storms and to offer programs that aid minority and low-income residents in relocating to less storm-prone areas or areas with greater economic opportunities.[36]

LOCAL FAIR HOUSING CASES

Recent U.S. Department of Justice Cases

The U.S. Department of Justice (DOJ) enacts lawsuits on behalf of individuals based on referrals from HUD. Under the Fair Housing Act, the DOJ may file lawsuits in the following instances:

- Where there is reason to believe that a person or entity is engaged in what is termed a "pattern or practice" of discrimination or where a denial of rights to a group of people raises an issue of general public importance;
- Where force or threat of force is used to deny or interfere with fair housing rights; and
- Where persons who believe that they have been victims of an illegal housing practice file a complaint with HUD or file their own lawsuit in federal or state court.[37]

The Department of Justice has not lodged a fair housing complaint against an individual or business in the State of Oklahoma in the last ten years. However, a case settled in September of 2004 in the Western District of Arkansas affected housing complexes in Claremore, Broken Arrow, Moore, Owasso, Bixby, and Oklahoma City. This case alleged that the Arkansas-based companies that developed these properties failed to incorporate accessible features required under the Fair Housing Act and the Americans with Disabilities Act. As conditions of the settlement, the builders agreed to correct any violations identified at the properties; establish a $1.2 million fund to compensate victims of those violations and to make accessibility modifications to the homes of individuals with disabilities in Arkansas; and to pay a civil penalty of $30,000 to the United States.[38]

SUMMARY

Residents of Oklahoma City are protected from discrimination in the housing market by laws at the federal, state, and local level. Laws at the federal and state level include protections based on race, color, religion, sex, national origin, familial status, and disability; and state law extends an additional protection based on age. Oklahoma City ordinances add ancestry and creed to federal and state protected class designations, but do not include protections based on familial status, disability, or age. The discussion of national fair housing studies and cases highlights the forms in which discrimination may present itself in the housing market as well an

[36] http://www.relmanlaw.com/docs/FinalConciliationAgreementTexas.pdf
[37] "The Fair Housing Act." The United States Department of Justice. http://www.justice.gov/crt/about/hce/housing_coverage.php
[38] *United States v. Deer Run Management Co., Inc., et al. (2004).*

increased scrutiny on the part of HUD in recent years of policies and practices that touch upon fair housing. In spite of this increased scrutiny, the Department of Justice has not filed any fair housing cases against Oklahoma residents in the last decade.

SECTION IV. REVIEW OF THE EXISTING FAIR HOUSING STRUCTURE

The purpose of this section is to provide a profile of fair housing in the City of Oklahoma City based on a number of factors, including an enumeration of key agencies and organizations that contribute to affirmatively furthering fair housing, evaluation of the presence and scope of services of existing fair housing organizations, and a review of the complaint process.

FAIR HOUSING AGENCIES

FEDERAL AGENCIES

U.S. Department of Housing and Urban Development

The U.S. Department of Housing and Urban Development (HUD) oversees, administers, and enforces the federal Fair Housing Act. HUD's regional office in Fort Worth oversees housing, community development, and fair housing enforcement in Arkansas, Louisiana, New Mexico, Oklahoma, and Texas. Contact information for HUD is listed below[39]:

Office of Fair Housing and Equal Opportunity
Department of Housing and Urban Development
451 Seventh Street SW, Room 5204
Washington, DC 20410-2000
Telephone: (202) 708-1112
Toll Free: (800) 669-9777
Web Site: http://www.HUD.gov/offices/fheo/online-complaint.cfm

The contact information for the regional HUD office in Fort Worth is:

Fort Worth Regional Office of FHEO
U.S. Department of Housing and Urban Development
801 Cherry Street, Unit #45
Suite 2500
Fort Worth, Texas 76102
Telephone: (817) 978-5900
Toll Free: (800) 669-9777
TTY: (817) 978-5595
Website: http://www.HUD.gov

The Office of Fair Housing and Equal Opportunity (FHEO) within HUD's Fort Worth office enforces the Fair Housing Act and other civil rights laws that prohibit discrimination in housing, mortgage lending, and other related transactions in City of Oklahoma City. HUD also provides education and outreach, monitors agencies that receive HUD funding for compliance with civil rights laws, and works with city and local agencies under the Fair Housing Assistance Program (FHAP) and Fair Housing Initiative Program (FHIP), as described below.

Fair Housing Assistance Program

The Fair Housing Assistance Program (FHAP) was designed to support local and city agencies that enforce local fair housing laws, provided that these laws are substantially equivalent to the Fair Housing Act. Substantial equivalency certification is a two-phase process: in the first phase, the Assistant Secretary for Fair Housing and Equal Opportunity makes a *prima facie* determination on the substantial equivalency of a city or local law to the federal Fair Housing Act. Once this determination has been made, and the law has been judged to be substantially equivalent, the agency enforcing the law is certified on an interim basis for a period of three years. During those three years, the local enforcement organization "builds its capacity to operate as a fully certified substantially equivalent agency", and FHAP grants during this time period are issued to support capacity-building. When the interim certification period ends after three years, the Assistant Secretary issues a determination on whether or not the city law is substantially equivalent to the Fair Housing Act "in operation", this is the second phase of the certification process. If the law is judged to be substantially equivalent in operation, the agency enforcing the law is fully certified as a substantially equivalent agency for five years.

HUD will typically refer most complaints of housing discrimination to a substantially equivalent city or local agency for investigation (such complaints are dual-filed at HUD and the city or local agency), if such an agency exists and has jurisdiction in the area in which the housing discrimination was alleged to have occurred. When federally subsidized housing is involved, however, HUD will typically investigate the complaint.

The benefits of substantially equivalent certification include the availability of funding for local fair housing activities, shifted enforcement power from federal to local authorities, and the potential to make the fair housing complaint process more efficient by vesting enforcement authority in those who are more familiar with the local housing market. In addition, additional funding may be available to support partnerships between local FHAP grantees and private fair housing organizations. There are currently no FHAP grantees in the State of Oklahoma.

Fair Housing Initiative Program

The Fair Housing Initiative Program (FHIP) is designed to support fair housing organizations and other non-profits that provide fair housing services to people who believe they have faced discrimination in the housing market. These organizations provide a range of services including initial intake and complaint processing, referral of complainants to government agencies that enforce fair housing law, preliminary investigations of fair housing complaints, and education and outreach on fair housing law and policy.

FHIP funding is available through three initiatives[40]: the Fair Housing Organizations Initiative (FHOI), the Private Enforcement Initiative (PEI), and the Education and Outreach Initiative (EOI). These initiatives are discussed in more detail below:

- **The Fair Housing Organizations Initiative (FHOI)**: FHOI funds are designed to help non-profit fair housing organizations build capacity to effectively handle fair housing

[40] Though there are four initiatives included in the FHIP, no funds are currently available through the Administrative Enforcement Initiative.

enforcement and outreach activities. A broader goal of FHOI funding is to strengthen the national fair housing movement by encouraging the creation of fair housing organizations.

- **The Private Enforcement Initiative (PEI)**: PEI funds are intended to support the fair housing activities of established non-profit organizations, including testing and enforcement, and more generally to offer a "range of assistance to the nationwide network of fair housing groups".
- **The Education and Outreach Initiative (EOI)**: EOI funding is available to qualified fair housing non-profit organizations as well as city and local government agencies. The purpose of the EOI is to promote initiatives that explain fair housing to the general public and housing providers, and provide the latter with information on how to comply with the requirements of the FHA.

Non-profit organizations are eligible to apply for funding under each or all of these initiatives. To receive FHOI funding, such organizations must have at least two years' experience in complaint intake and investigation, fair housing testing, and meritorious claims in the three years prior to applying for funding. Eligibility for PEI funding is subject to "certain requirements related to the length and quality of previous fair housing enforcement experience." Organizations applying for the EOI must also have two years' experience in the relevant fair housing activities; EOI funds are also potentially available to city and local government agencies.

The Metropolitan Fair Housing Council of Oklahoma ("Metro Fair Housing") has served Oklahomans who believe that they have been subject to unlawful discrimination in the housing market since 1979. A consistent FHIP participant and grantee, Metro Fair Housing received nearly $324,500 from HUD in 2013. The purpose of this grant was to allow the organization to increase enforcement efforts, fair housing testing, and accessibility audits, while partnering with public and private organizations to provide fair lending education to state residents. The organization received similar grants in prior years, including grants of around $324,800 in both 2011 and 2012.

STATE AGENCIES

State of Oklahoma Attorney General's Office of Civil Rights Enforcement

Violations of Oklahoma's anti-discrimination statute are investigated and prosecuted by the state Attorney General's Office of Civil Rights Enforcement. In the event that the Attorney General's (AG) investigation establishes that there is reasonable cause to believe that a complaint represents a true instance of discrimination, the AG is authorized by statute to file a civil action on behalf of the aggrieved party. The Office of Civil Rights Enforcement may be contacted through the following information:

Oklahoma Attorney General's Office
Office of Civil Rights Enforcement
907 S. Detroit, Suite 750
Tulsa, OK 74120
Telephone: (918) 581-2201
Website: http://www.ok.gov/oag/About_the_Office/OCRE.html
Complaint Form Available From (PDF): http://www.ok.gov/oag/documents/OCRE%20-%20Housing%20Discrimination%20Form%20fillable.pdf

LOCAL AGENCIES

Oklahoma City Municipal Counselor

City residents who feel that they have been the victims of discrimination prohibited under Oklahoma City's Human Rights ordinance may file a complaint with the Municipal Counselor. The Municipal Counselor is the official charged with representing the City in legal proceedings; advising various city officials, departments, and commissions; and prosecuting violations of City ordinances. The Municipal Counselor may be contacted through the following information:

Oklahoma City Municipal Counselor
Kenneth D. Jordan
200 N. Walker
Oklahoma City, Oklahoma 73102
Telephone: (405) 297-2451

NON-PROFIT ORGANIZATIONS

Metropolitan Fair Housing Council of Oklahoma

The Metropolitan Fair Housing Council of Oklahoma (MFHC) is an Oklahoma City-based non-profit organization that provides fair housing services to Oklahoma residents. Such services include fair housing counseling, investigation and testing, mediation services, and legal and complaint referral. As part of its complaint referral services, the organization facilitates the filing of housing complaints with HUD and serves as an advocate for the complaint throughout the complaint and investigatory process. The MFHC can be contacted through the following:

Metropolitan Fair Housing Council of Oklahoma, Inc.
1500 Northeast 4th Street, Suite 204
Oklahoma City, Oklahoma 73117
Telephone (Local): (405) 232-3247
Telephone (Toll Free): 1 (866) 677-7541

Legal Aid Services of Oklahoma

Legal Aid Services of Oklahoma serves Oklahoma residents as part of their mission to be a "partner in the community making equal justice for all a reality". A non-profit law firm that provides legal assistance to low-income residents and seniors with civil legal problems, Legal Aid offers a range of services that include assistance to individuals who believe that they have been subject to discrimination in the housing market. Legal Aid may be contacted through the following:

Legal Aid Services of Oklahoma, Inc.
2915 North Classen Boulevard, Suite 500
Oklahoma City, Oklahoma 73106
Telephone (Local): (405) 557-0020

COMPLAINT PROCESS REVIEW

COMPLAINT PROCESSES FOR FAIR HOUSING AGENCIES

U.S. Department of Housing and Urban Development

The intake stage is the first step in the complaint process. When a complaint is submitted, intake specialists review the information and contact the complainant (the party alleging housing discrimination) in order to gather additional details and determine if the case qualifies as possible housing discrimination. If the discriminatory act alleged in the complaint occurred within the jurisdiction of a substantially equivalent city or local agency under the FHAP, the complaint is referred to that agency, which then has 30 days to address the complaint. If that agency fails to address the complaint within that time period, HUD can take the complaint back.

If HUD determines that it has jurisdiction and accepts the complaint for investigation, it will draft a formal complaint and send it to the complainant to be signed. Once HUD receives the signed complaint, it will notify the respondent (the party alleged to have discriminated against the complainant) within ten days that a complaint has been filed against him or her. HUD also sends a copy of the formal complaint to the respondent at this stage. Within ten days of receiving the formal complaint, the respondent must respond to the complaint.

Next, the circumstances of the complaint are investigated through interviews and examination of relevant documents. During this time, the investigator attempts to have the parties rectify the complaint through conciliation. The case is closed if conciliation of the two parties is achieved or if the investigator determines that there was no reasonable cause of discrimination. If conciliation fails, and reasonable cause is found, then either a federal judge or a HUD Administrative Law Judge hears the case and determines damages, if any.[41] In the event that the federal court judge finds the discrimination alleged in a complaint to have actually occurred, the respondent may be ordered to:

[41] "HUD's Title VIII Fair Housing Complaint Process." http://www.hud.gov/offices/fheo/complaint-process.cfm

- Compensate for actual damages, including humiliation, pain, and suffering;
- Provide injunctive or other equitable relief to make the housing available;
- Pay the federal government a civil penalty to vindicate the public interest, with a maximum penalty of $10,000 for a first violation and $50,000 for an additional violation within seven years; and/or
- Pay reasonable attorneys' fees and costs.[42]

If neither party elects to go to federal court, a HUD Administrative Law Judge will hear the case. Once the judge has decided the case, he or she issues an initial decision. If the judge finds that housing discrimination has occurred, he or she may award a civil penalty of up to $11,000 to the complainant, along with actual damages, court costs, and attorney's fees. When the initial decision is rendered, any party that is adversely affected by that decision can petition the Secretary of HUD for review within 15 days. The Secretary has 30 days following the issuance of the initial decision to affirm, modify, or set aside the decision, or call for further review of the case. If the Secretary does not take any further action on the complaint within 30 days of the initial decision, the decision will be considered final. After that, any aggrieved party must appeal to take up their grievance in the appropriate court of appeals.[43]

Oklahoma Attorney General's Office of Civil Rights Enforcement

The Office of Civil Rights Enforcement is empowered by §25-1501 of the Oklahoma Statutes to "receive, investigate, seek to conciliate, hold hearings on, and pass upon complaints alleging violations of [§25-1101 et seq.]."[44] Those who claim to have been subjected to unlawful discrimination in the housing market may file a complaint with the Attorney General within a year after the alleged discriminatory action. Once the complaint has been filed, the Commission or one of its representatives will notify the person against whom the complaint is directed (the "respondent") that a complaint has been filed against him or her. The respondent then has ten days to respond to the complaint.[45]

Once a complaint has been lodged with the state AG, the OCRE will conduct an investigation of the facts alleged in the complaint. At the same time, the AG will attempt to bring the parties together in conciliation of the complaint. If the conciliation attempt is successful, the AG will end the investigation. If there is no conciliation between the parties, the AG will issue its findings on whether or not there is reasonable cause to believe that discrimination has occurred. If the AG finds no such cause, it will dismiss the complaint.

If the AG determines that the respondent has committed unlawful discriminatory acts against the complainant, or is about to do so, he or she may file a civil action on behalf of the aggrieved party. In such an action, the complainant may be entitled to punitive damages, reasonable attorney's fees, court costs, and an order enjoining the respondent from continuing the discriminatory policy at issue in the complaint, along with "appropriate affirmatory action".

[42] "Fair Housing—It's Your Right." http://www.hud.gov/offices/fheo/FHLaws/yourrights.cfm
[43] "HUD's Title VIII Fair Housing Complaint Process." http://www.hud.gov/offices/fheo/complaint-process.cfm
[44] §25-1101
[45] §25-1502.2-3

Oklahoma City Human Rights Ordinance

Oklahoma City residents who believe that they have suffered discrimination in the housing market on the basis of race, color, religion, sex, creed, ancestry, or national origin have thirty days to lodge a complaint with the City's Municipal Counselor. The City Manager is authorized in §25-44 to "make available to the complainant, the respondent, any City department, the Municipal Counselor and Municipal Court any services of the Department of Human Resources or ad hoc committees that may be of assistance in the investigation and conciliation of complaints."

If a respondent is convicted of violating Oklahoma's Human Rights law, he or she will be considered guilty of an offense against the City. If he or she receives four such convictions, he or she may be deemed a "public nuisance". Potential consequences of this designation include the loss of business licenses or permits and an application from the Municipal Counselor for injunctive relief, at the recommendation of the Department of Human Services.

Metropolitan Fair Housing Council of Oklahoma

When a fair housing complaint is lodged with the Metropolitan Fair Housing Council (MFHC), the organization initiates the complaint referral process by conducting a screening interview, gathering case notes, and entering details of the allegation into a database. After gathering supporting documentation and respondent information, MFHC's Fair Housing staff will conduct a case review to determine whether or not the complaint has standing. If the organization determines that the complaint does not represent a bona fide allegation, it will refer the matter for landlord/tenant counseling or to other available resources.

In the event that the Fair Housing staff determines that a complaint amounts to a bona fide fair housing allegation, it will hold a case review with the Executive Director, the Enforcement Staff, and/or the MFHC General Council to decide on an appropriate follow-up action. Follow up actions potentially include a request for reasonable accommodation or reasonable modification for a complainant with a disability, fair housing testing, referral of the matter to Legal Aid or a cooperating attorney, and the filing of an administrative complaint with HUD.

In the latter case, the MFHC will continue to serve as an advocate for the complainant during the HUD administrative process described on pages 55-56. A request for reasonable accommodation or modification, if successful, can lead to the closure of the complaint. If the request is not successful, the matter will be referred to HUD after a final case review by MFHC. Complaints that are referred for fair housing testing will also be reviewed by MFHC and referred to HUD. Complaints that are referred to Legal Aid or a cooperating attorney may be resolved, or may end in a lawsuit, trial, and/or settlement.[46]

SUMMARY

Oklahoma City residents who feel that they have experienced unlawful discrimination in the housing market may file a complaint with HUD, the Oklahoma Attorney General's Office, the Oklahoma City Municipal Counselor, and the MFHC. The latter, a local non-profit organization

[46] Business correspondence with MFHC

and FHIP grantee, contracts with the city to conduct fair housing activities, including investigation of fair housing complaints. Note that because federal, state, and local anti-discrimination laws recognize different protected classes in some cases, the agency to which a resident may bring his or her complaint will depend on the nature of the complaint. For example, those who file a complaint based on age discrimination with the Metropolitan Fair Housing Council will likely have their complaint referred, if meritorious, to the Oklahoma Attorney General rather than to HUD, since age discrimination in the private housing market would not represent a violation of the Fair Housing Act unless the housing project in question were a recipient of federal funding.

SECTION V. FAIR HOUSING IN THE PRIVATE SECTOR

As part of the AI process, the U.S. Department of Housing and Urban Development (HUD) suggests that the analysis focus on possible housing discrimination issues in both the private and public sectors. Examination of housing factors in the City of Oklahoma City's public sector is presented in **Section VI**, while this section focuses on research regarding the city's private sector, including the mortgage lending market, the real estate market, the rental market, and other private sector housing industries.

LENDING ANALYSIS

HOME MORTGAGE DISCLOSURE ACT

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.[47] 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.[48] Both types of lending institutions must meet the following set of reporting criteria:

[47] *Closing the Gap: A Guide to Equal Opportunity Lending,* The Federal Reserve Bank of Boston, April 1993. http://www.bos.frb.org/commdev/closing-the-gap/closingt.pdf

[48] Data are considered "raw" because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made significant changes in reporting, particularly regarding ethnicity data, loan interest rates, and the multi-family loan applications.

1. The institution must be a bank, credit union, or savings association;
2. The total assets must exceed the coverage threshold;[49]
3. The institution must have had an office in a Metropolitan Statistical Area (MSA);
4. 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;
5. The institution must be federally insured or regulated; and
6. 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:

1. The institution must be a for-profit organization;
2. 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;
3. 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
4. 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 2004 for documenting loan applicants' race and ethnicity, so data are most easily compared after that point.

Home Purchase Loans

Table V.1 below presents data on home loan applications for every year from 2004 through 2013. Of the 444,191 loan applications submitted from Oklahoma City residents during that time, 192,326 were home purchase loans.

Table V.1
Purpose of Loan by Year
City of Oklahoma City
2004–2013 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Home Purchase	22,759	28,026	27,825	21,916	16,603	15,846	14,136	13,235	15,142	16,838	192,326
Home Improvement	5,384	5,880	5,827	5,570	4,193	3,481	3,186	2,910	3,061	3,540	43,032
Refinancing	30,008	27,257	24,217	19,712	15,578	22,792	18,015	16,156	19,267	15,831	208,833
Total	**58,151**	**61,163**	**57,869**	**47,198**	**36,374**	**42,119**	**35,337**	**32,301**	**37,470**	**36,209**	**444,191**

[49] Each December, the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year based on changes in the Consumer Price Index for Urban Wage Earners and Clerical Workers.

Most home purchase loan applications were submitted by those who planned to live in the housing units financed by those loans. As shown in Table V.2 below, owner-occupied units were the subject of 171,926 home purchase loan applications, or nearly 90 percent of all home purchase loans. The following analysis will focus on owner-occupied loan applications and originations, as these loans provide the best index of an individual's ability to choose where he or she lives.

Table V.2
Occupancy Status for Home Purchase Loan Applications
City of Oklahoma City
2004–2013 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Owner-Occupied	20,266	24,493	23,917	19,120	14,821	14,774	13,083	12,164	13,957	15,331	171,926
Not Owner-Occupied	2,355	3,394	3,823	2,710	1,745	1,046	1,013	1,031	1,146	1,442	19,705
Not Applicable	138	139	85	86	37	26	40	40	39	65	695
Total	**22,759**	**28,026**	**27,825**	**21,916**	**16,603**	**15,846**	**14,136**	**13,235**	**15,142**	**16,838**	**192,326**

Denial Rates

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.

These outcomes were used to determine denial rates presented in the following section. Factors in denial of home purchase loans, such as credit scores or down payment amounts, are not reported in every report submitted through the HMDA, so the reasons for specific loan denials are often unknown. However, with that caveat in mind, the ratio of loan originations to loan denials can be seen as an indicator of the overall success or failure of home purchase loan applicants.

Table V.3 on the following page details the outcomes of those owner-occupied home purchase loan applications: 85,618 loans were originated over the nine-year period, and 16,806 were denied, for an average loan denial rate of 16.4 percent. The rate of loan denials consistently fell between 2005 and 2009, with the exception of 2008, and began to rise again after 2009. A complete version of this table with yearly complaint data is included in Appendix E as Table E.1.

Table V.3
Loan Applications by Action Taken
City of Oklahoma City
2004–2013 HMDA Data

Action	Total
Loan Originated	85,618
Application Approved but not Accepted	7,229
Application Denied	16,806
Application Withdrawn by Applicant	11,262
File Closed for Incompleteness	2,233
Loan Purchased by the Institution	48,645
Preapproval Request Denied	127
Preapproval Approved but not Accepted	6
Total	**171,926**
Denial Rate*	**16.4%**

*Denial rates based on number of applications denied and number of loans originated

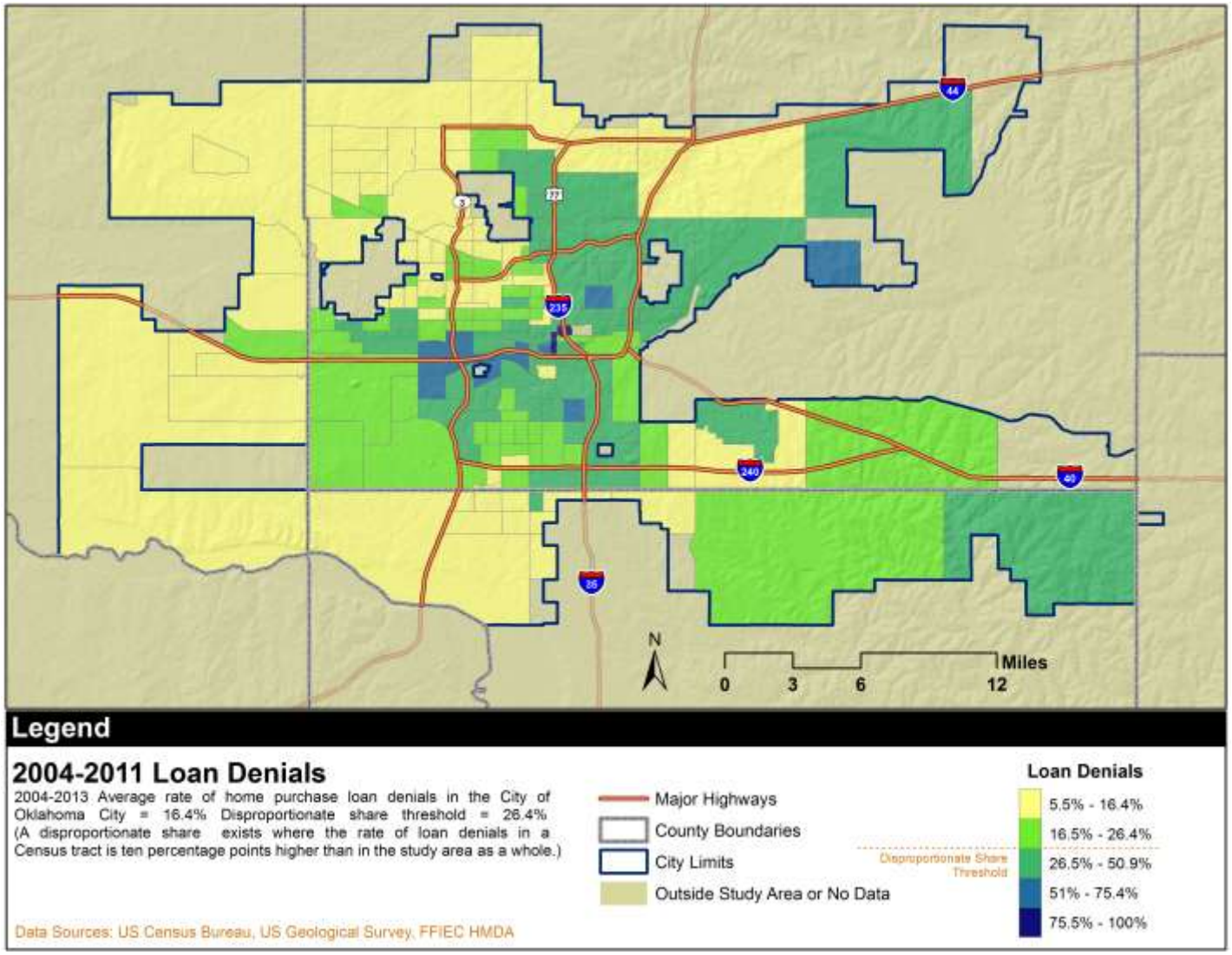
From 2004 through 2011, loan applicants seeking to buy a home in and around the city center were subjected to the highest rates of loan denials, as shown in Map V.1 on the following page. More than a quarter of loan applications were denied in Census tract in the city center itself, as well as in areas to the northeast, east, south, and west of the city center. Lower rates of low denials were observed in Census tracts to the immediate north and northwest of the city center, though many of these areas still had above-average denial rates. The lowest rates of loan denial were observed in outlying Census tracts. Note that many tracts with high rates of loan denials were tracts that also had relatively large shares of minority residents. The same overall pattern that was observed in 2004-2011 held in 2012-2013, as shown in Map V.2 on page 78.

In addition to yearly variation, loan denial rates were observed to differ markedly by gender, as shown in Table V.4 below. Overall, the denial rate for female applicants was over three percentage points higher than the denial rate for male applicants; denials rates for each were 18.1 and 14.9 percent, respectively. Female applicants were subject to a higher denial rate than male applicants in every year during the ten-year period; the discrepancy between the two ranged from 1.3 to 5.4 percentage points.

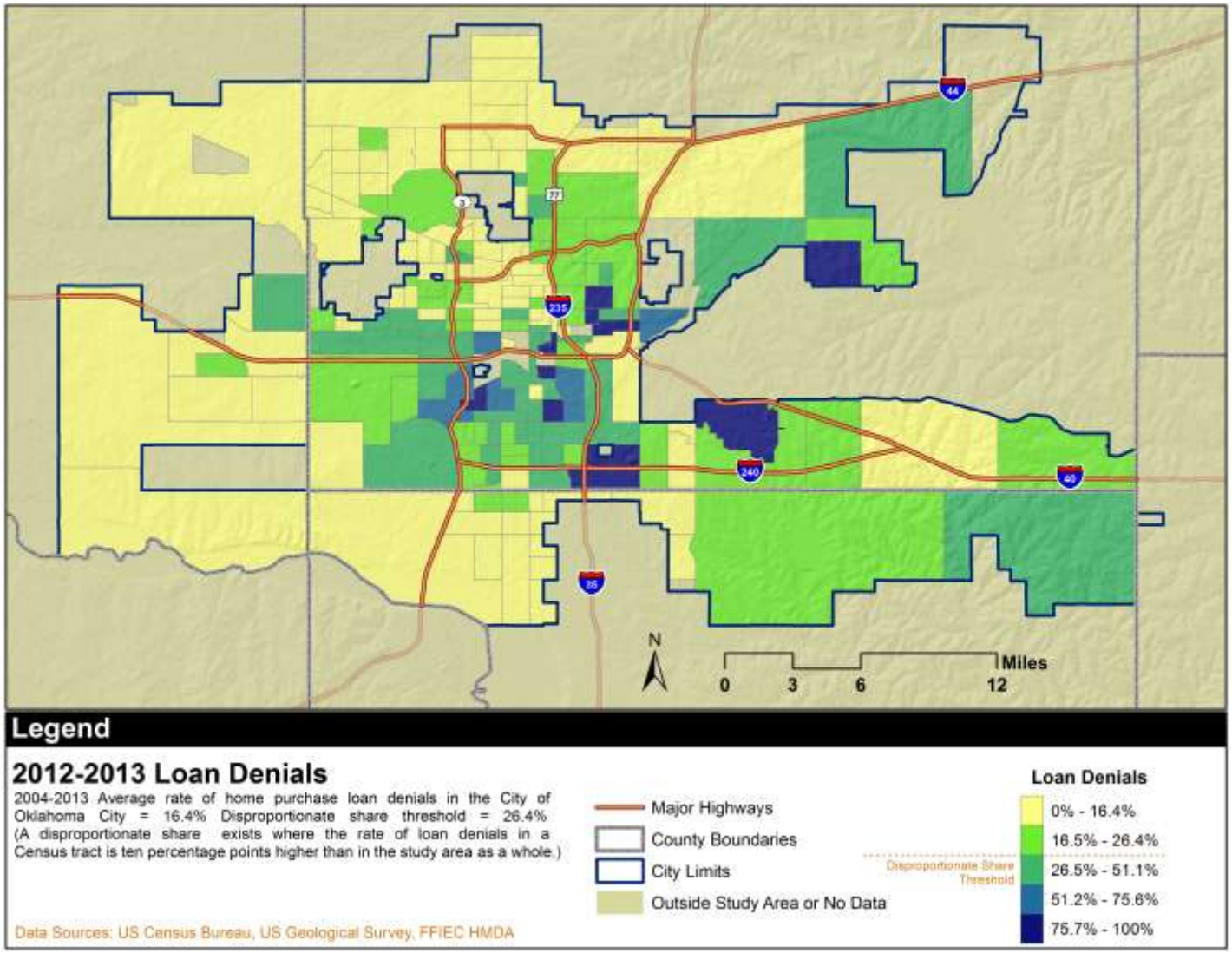
Table V.4
Denial Rates by Gender of Applicant
City of Oklahoma City
2004–2013 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	16.5%	19.1%	39.2%	0.0%	18.0%
2005	17.3%	20.9%	40.2%	15.4%	19.2%
2006	15.9%	21.3%	35.5%	22.2%	18.3%
2007	14.1%	17.5%	29.3%	0.0%	15.8%
2008	14.2%	18.9%	25.9%	0.0%	16.0%
2009	11.1%	12.9%	15.8%	0.0%	11.8%
2010	13.8%	15.6%	16.0%	0.0%	14.4%
2011	14.8%	16.3%	17.5%	12.5%	15.4%
2012	14.5%	17.1%	24.5%	0.0%	15.8%
2013	14.2%	15.5%	24.1%	0.0%	15.1%
Average	**14.9%**	**18.1%**	**27.5%**	**7.2%**	**16.4%**

Map V.1
Denial Rates by Census Tract, 2004-2011
City of Oklahoma City
2004–2011 HMDA Data



Map V.2
Denial Rates by Census Tract, 2012 and 2013
City of Oklahoma City
2012-2013 HMDA Data



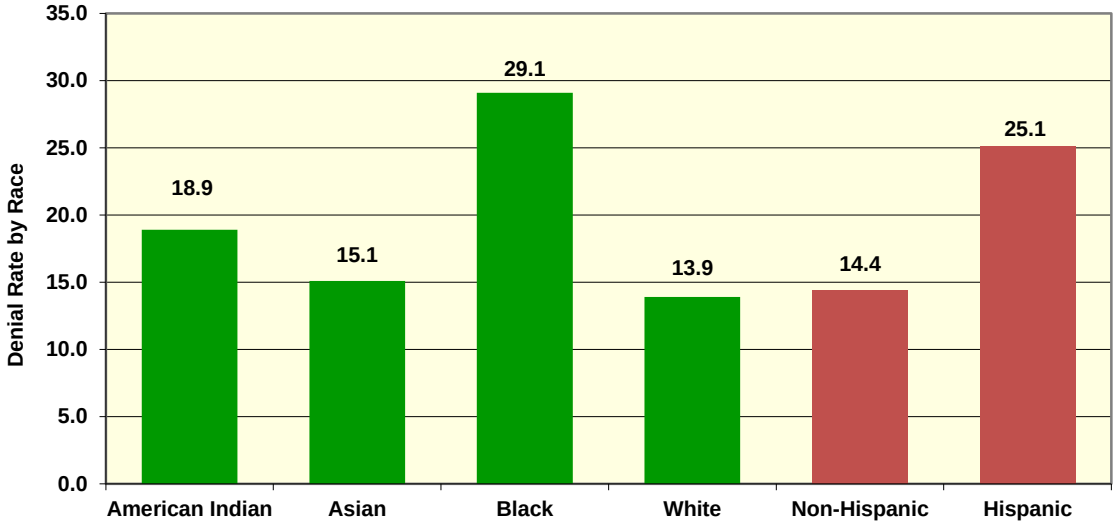
The rate of loan denials also varied according to the race and ethnicity of the applicant, as shown in Table V.5 below. Around 29 percent of loan applications from black applicants were denied over the nine-year period, over twice the denial rate of 13.9 percent for white applicants. In addition, the denial rate for Hispanic applicants, which was 25.1 percent, exceeded that of non-Hispanic applicants by more than ten percentage points.

Table V.5
Denial Rates by Race/Ethnicity of Applicant
City of Oklahoma City
2004–2013 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Average
American Indian	24.7%	23.8%	19.9%	18.3%	19.7%	13.8%	17.4%	20.1%	15.8%	14.4%	18.9%
Asian	12.3%	16.5%	15.6%	15.5%	18.8%	13.0%	15.4%	18.7%	12.6%	13.8%	15.1%
Black	29.1%	33.5%	34.9%	33.0%	26.9%	21.1%	21.5%	21.0%	23.9%	22.5%	29.1%
White	14.8%	15.4%	14.8%	13.0%	14.1%	10.5%	13.1%	13.9%	14.2%	13.6%	13.9%
Not Available	33.5%	36.4%	31.2%	26.2%	25.1%	16.6%	20.3%	22.3%	27.4%	25.3%	27.9%
Not Applicable	28.4%	0%	22.2%	0%	0%	0%	0%	16.7%	0%	0%	18.2%
Average	**18.0%**	**19.2%**	**18.3%**	**15.8%**	**16.0%**	**11.8%**	**14.4%**	**15.4%**	**15.8%**	**15.1%**	**16.4%**
Non-Hispanic	16.1%	17.3%	16.1%	13.8%	14.4%	10.7%	12.9%	13.4%	12.9%	12.4%	14.4%
Hispanic	28.0%	23.9%	23.7%	23.4%	25.4%	21.5%	24.0%	26.3%	29.4%	26.8%	25.1%

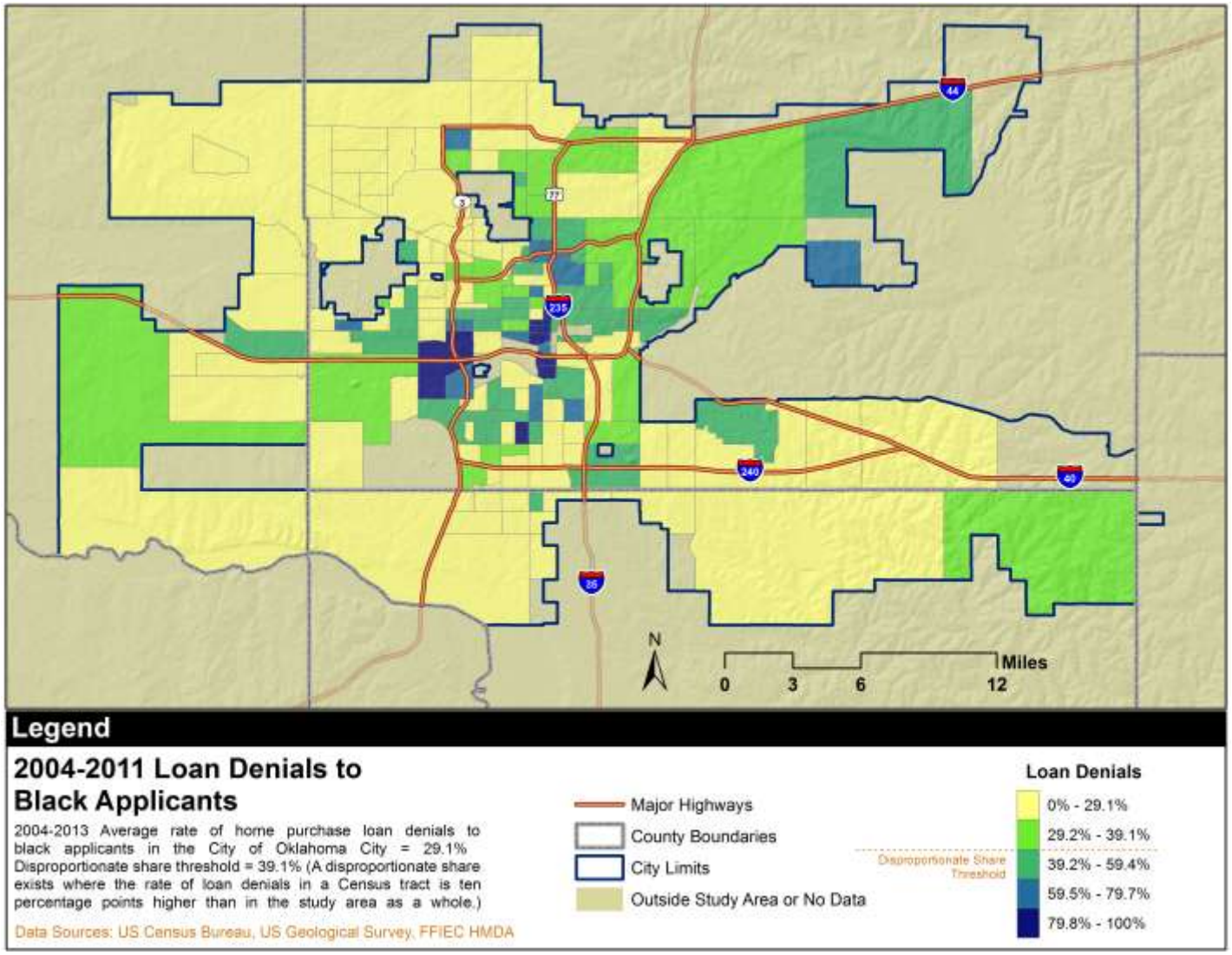
Diagram V.1 below shows overall denial rates by race and ethnicity from 2004 through 2013.

Diagram V.1
Denial Rates by Race/Ethnicity of Applicant
City of Oklahoma City
2004–2013 HMDA Data

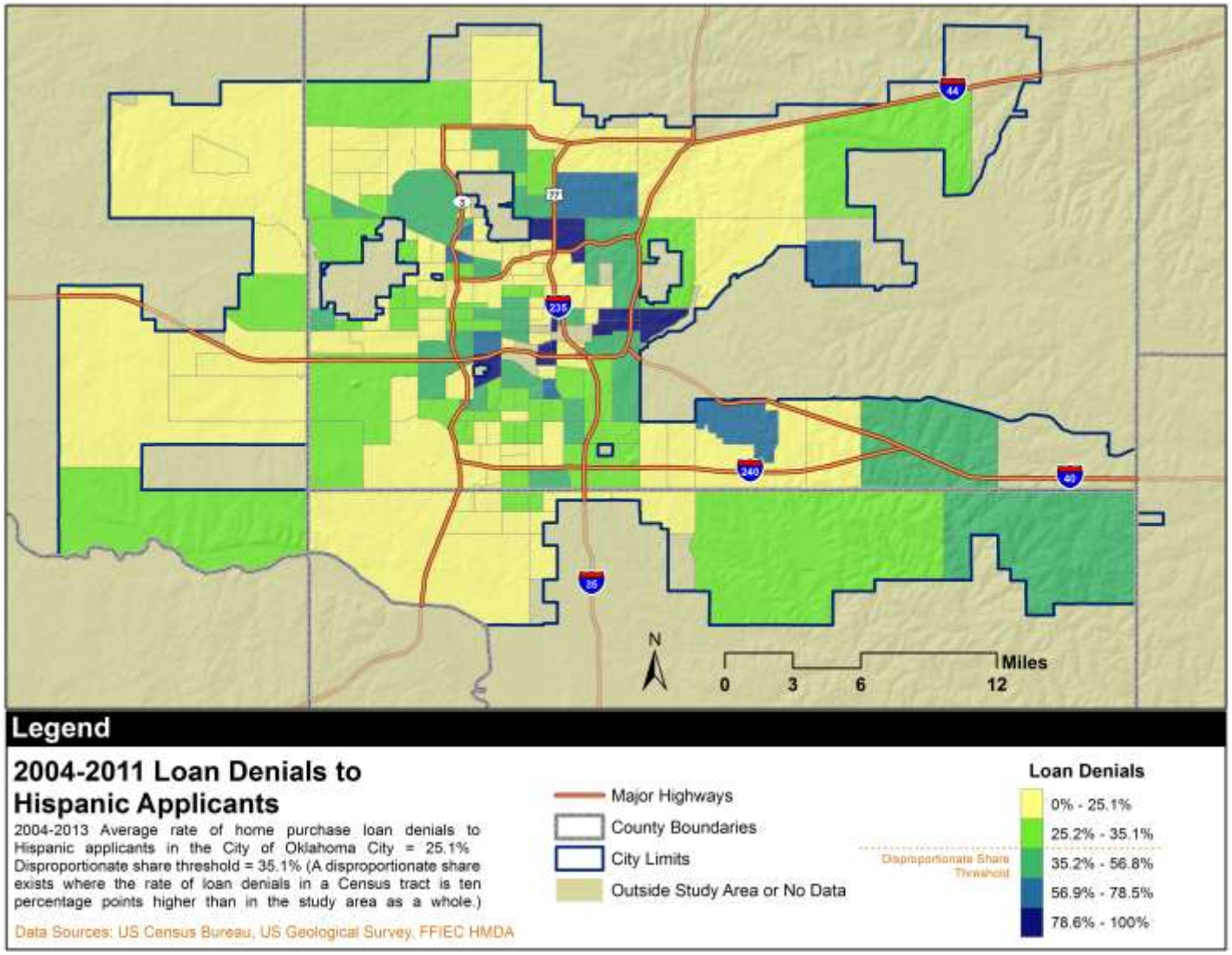


Map V.3 on the following page shows where black loan applicants were subjected to particularly high loan denial rates from 2004-2011. Interestingly, though black applicants were subjected to disproportionately high rates of loan denials in areas with high concentrations of black residents, still higher denial rates were observed outside of those areas.

Map V.3
Denial Rates for Black Applicants by Census Tract
City of Oklahoma City
2004-2011 HMDA Data



Map V.4
Denial Rates for Hispanic Applicants by Census Tract
City of Oklahoma City
2004–2011 HMDA Data



Hispanic loan applicants were subjected to relatively high rates of loan denials in central Census tracts, as shown in Map V.4 on the previous page. However, there was no clear trend toward the concentration of these loan denials to any specific part of the city center, though the several Census tracts to the east of the Arts District had disproportionately high rates of loan denials. This area, in which more than a third of loan applications from Hispanic residents were denied from 2004 through 2011, also had disproportionately high concentrations of Hispanic residents in 2000 and 2010.

Information on home loans collected under HMDA generally includes the reasons for loan denials: these data are presented in Table V.6 below. As shown, credit history and debt-to-income ratio were among the most prevalent factors in home purchase loan denials from 2004 through 2012. Credit history consistently figured in more than 20 percent of loan denials, and was cited as a primary factor in more than a quarter of loan denials in 2011. Debt-to-income ratio, which was a factor in less than ten percent of loan denials in 2004, was cited in nearly 19 percent of loan denials in 2011.

Table V.6
Loan Applications by Reason for Denial
City of Oklahoma City
2004–2013 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Debt-to-Income Ratio	204	270	265	263	224	151	188	209	192	170	2,136
Employment History	35	37	50	41	36	30	20	19	26	28	322
Credit History	585	636	578	389	320	216	247	298	319	236	3,824
Collateral	111	137	170	136	97	73	85	79	79	86	1,053
Insufficient Cash	73	32	44	59	46	27	30	21	25	41	398
Unverifiable Information	80	191	108	96	60	29	31	27	26	29	677
Credit Application Incomplete	164	215	173	179	127	71	55	42	72	90	1,188
Mortgage Insurance Denied	0	1	0	2	11	5	7	2	5	2	35
Other	383	578	415	176	108	58	57	51	52	56	1,934
Missing	688	681	835	448	396	305	372	359	530	625	5,239
Total	**2,323**	**2,778**	**2,638**	**1,789**	**1,425**	**965**	**1,092**	**1,107**	**1,326**	**1,363**	**16,806**

As one might expect, applicants with higher incomes were denied loans at lower rates than lower-income applicants. As shown in Table V.7 below, applicants who earned more than $75,000 per year were denied loans in 9.8 percent of applications. These denial rates rose progressively as incomes fell; just over half of all applications submitted by residents making $15,000 per year or less were denied.

Table V.7
Denial Rates by Income of Applicant
City of Oklahoma City
2004–2013 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
$15,000 or Below	51.5%	49.5%	34.8%	43.8%	56.3%	42.3%	52.5%	64.3%	75.0%	61.2%	50.8%
$15,001–$30,000	27.4%	30.4%	29.2%	25.4%	28.2%	18.4%	23.5%	28.2%	34.8%	34.7%	27.9%
$30,001–$45,000	19.9%	20.6%	20.1%	16.2%	17.9%	11.0%	15.7%	17.6%	18.3%	18.6%	18.0%
$45,001–$60,000	16.3%	16.5%	18.4%	15.4%	14.0%	11.2%	13.7%	15.2%	14.9%	15.6%	15.5%
$60,001–$75,000	10.3%	15.0%	14.1%	10.6%	12.6%	9.9%	9.8%	10.9%	11.0%	11.6%	11.8%
Above $75,000	9.7%	11.8%	10.9%	11.5%	10.0%	8.4%	8.9%	8.1%	8.3%	8.3%	9.8%
Data Missing	24.6%	23.3%	21.2%	26.1%	34.3%	22.7%	32.9%	23.8%	31.7%	20.5%	24.6%
Total	**18.0%**	**19.2%**	**18.3%**	**15.8%**	**16.0%**	**11.8%**	**14.4%**	**15.4%**	**15.8%**	**15.1%**	**16.4%**

However, discrepancies between racial/ethnic groups in loan denial rates persist even when the income of the applicant is taken into account. As shown in Table V.8 below, nearly a quarter of loan applications from black applicants who earned more than $75,000 per year were denied, compared to a denial rate of 8.1 percent for white applicants who were similarly situated with respect to income. Similarly, Hispanic applicants were subject to a loan denial rate of 15.9 percent in the top income bracket, while only 8.9 percent of loan applications from non-Hispanic residents in the same income range were denied.

Table V.8
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
City of Oklahoma City
2004–2013 HMDA Data

Race	<= $15K	$15K–$30K	$30K–$45K	$45K–$60K	$60K–$75K	Above $75K	Data Missing	Average
American Indian	68.3%	28.1%	19.4%	16.7%	13.4%	12.0%	23.1%	18.9%
Asian	50.0%	17.1%	16.4%	15.4%	14.1%	9.1%	38.6%	15.1%
Black	55.9%	38.3%	28.1%	27.8%	20.1%	24.9%	38.8%	29.1%
White	47.7%	25.3%	15.4%	13.1%	10.1%	8.1%	18.9%	13.9%
Not Available	60.8%	43.4%	30.5%	25.5%	20.5%	18.0%	44.3%	27.9%
Not Applicable	50.0%	23.5%	30.0%	22.2%	75.0%	10.5%	2.0%	18.2%
Average	**50.8%**	**27.9%**	**18.0%**	**15.5%**	**11.8%**	**9.8%**	**24.6%**	**16.4%**
Non-Hispanic	49.1%	26.0%	15.9%	13.8%	10.7%	8.9%	20.9%	14.4%
Hispanic	48.3%	28.1%	24.2%	24.2%	17.3%	15.9%	29.0%	25.1%

Predatory Lending

In addition to modifications implemented in 2004 to correctly document loan applicants' race and ethnicity, the HMDA reporting requirements were changed in response to the Predatory Lending Consumer Protection Act of 2002 as well as the Home Owner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

1. If they are HOEPA loans;[50]
2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
3. Presence of high annual percentage rate (APR) loans (HALs), defined as more than three percentage points higher than comparable treasury rates for home purchase loans, or five percentage points higher for refinance loans.[51]

Of the 85,618 home purchase loans originated in the city over the ten-year time period, 9,618 were HALs. As shown in Table V.9 on the following page, these figures yield a HAL rate of 11.2 percent. HAL rates have varied considerably by year, ranging from a high of 23.7 percent in 2005 to a low of 1.3 percent in 2010. Recent HAL rates have remained relatively low.

[50] Loans are subject to the HOEPA if they impose rates or fees above a certain threshold set by the Federal Reserve Board. "HMDA Glossary." http://www.ffiec.gov/hmda/glossary.htm#H
[51] 12 CFR Part 203, http://www.ffiec.gov/hmda/pdf/regc_020702.pdf

Table V.9
Originated Owner-Occupied Loans by HAL Status
City of Oklahoma City
2004–2013 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Other	9,078	8,911	9,264	8,409	6,720	6,838	6,389	5,923	6,911	7,557	76,000
HAL	1,514	2,765	2,531	1,153	754	365	82	170	165	119	9,618
Total	**10,592**	**11,676**	**11,795**	**9,562**	**7,474**	**7,203**	**6,471**	**6,093**	**7,076**	**7,676**	**85,618**
Percent HAL	14.3%	23.7%	21.5%	12.1%	10.1%	5.1%	1.3%	2.8%	2.3%	1.6%	11.2%

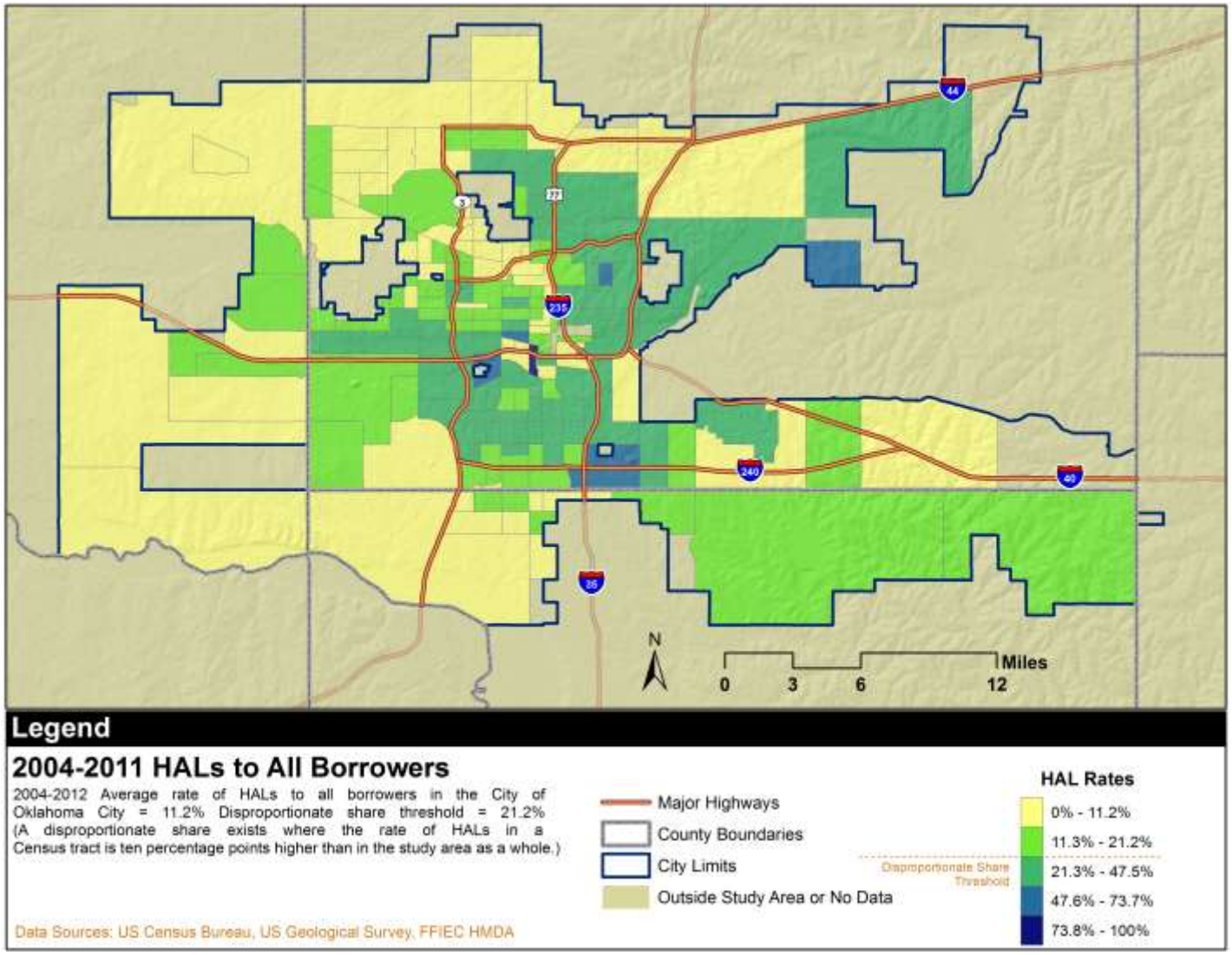
HALs were issued disproportionately in Census tracts throughout the city, though they tended to be concentrated in the areas to the northeast and southwest of the city center. As shown in Map V.5 on the following page, HALs accounted for more than a fifth of home loans issued in these areas, many of which held disproportionate concentrations of black and Hispanic residents in 2000 and 2010. In 2012-2013, high rates of HALs were isolated to a few Census tracts in the western portion of the city, as shown in Map V.6 on page 86.

As had been the case with loan denials, HAL rates for borrowers in Oklahoma City have varied considerably according to the race or ethnicity of the borrower. As shown in Table V.10 below, white borrowers were issued HALs at an average rate of 9.8 percent, less than the average rate. By contrast, 26.6 percent of loans issued to black borrowers were HALs. Similarly, 21.4 percent of loans issued to Hispanic borrowers were HALs—this is more than twice the rate at which HALs were issued to non-Hispanic borrowers.

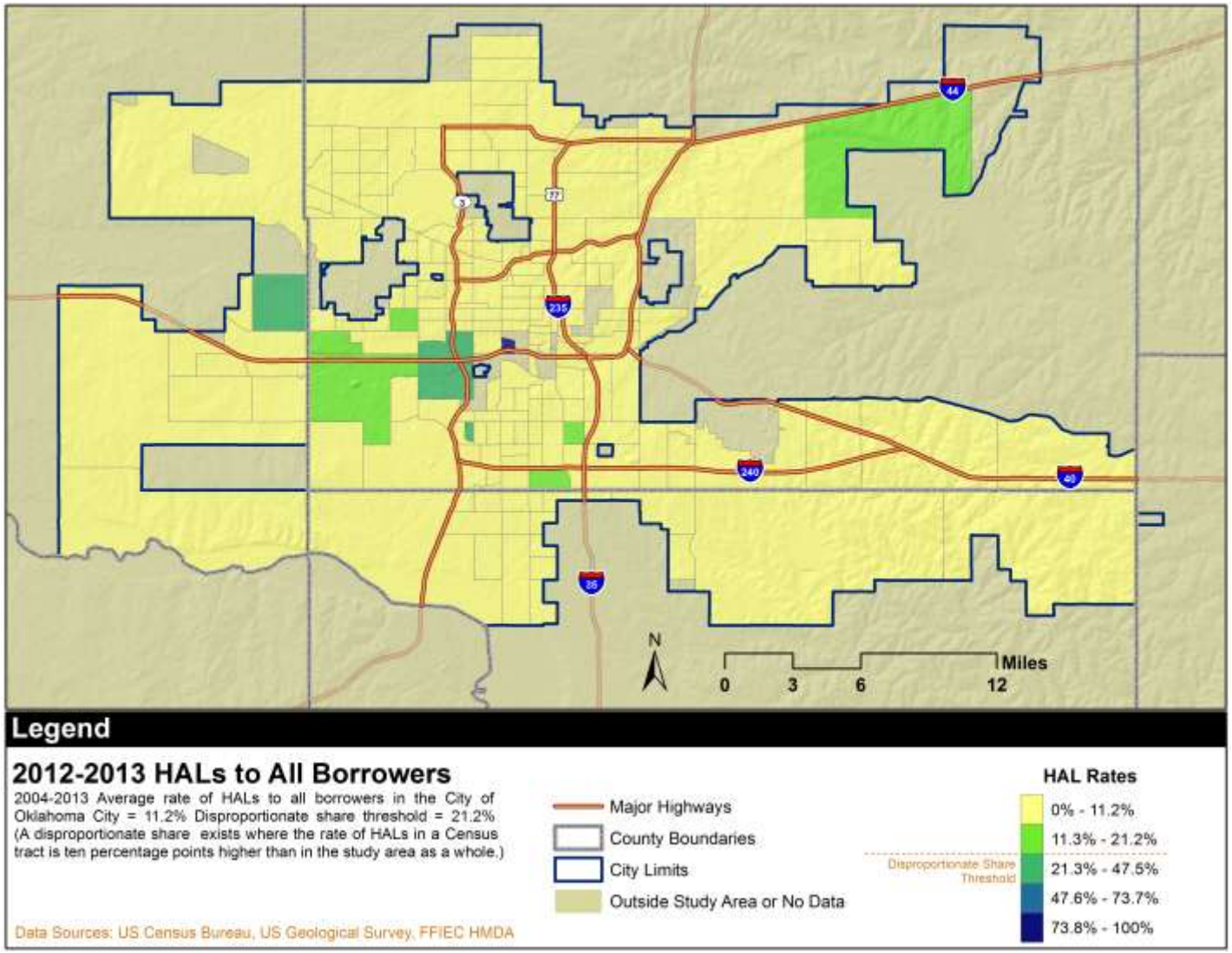
Table V.10
Rate of HALs Originated by Race/Ethnicity of Borrower
City of Oklahoma City
2004–2013 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Average
American Indian	21.2%	26.1%	30.7%	12.3%	8.2%	3.6%	2.5%	3.7%	2.3%	.7%	12.0%
Asian	13.0%	17.9%	15.1%	10.7%	9.0%	7.2%	.7%	2.4%	1.2%	1.5%	9.1%
Black	31.9%	50.7%	48.3%	27.3%	15.6%	5.8%	1.0%	2.6%	1.4%	.8%	26.6%
White	11.9%	19.8%	18.2%	11.0%	9.7%	5.1%	1.3%	2.8%	2.4%	1.6%	9.8%
Not Available	20.6%	38.2%	27.5%	12.0%	10.9%	3.0%	.6%	2.9%	2.7%	1.9%	14.3%
Not Applicable	4.2%	10.0%	42.9%	.0%	16.7%	.0%	.0%	.0%	.0%	.0%	7.1%
Average	**14.3%**	**23.7%**	**21.5%**	**12.1%**	**10.1%**	**5.1%**	**1.3%**	**2.8%**	**2.3%**	**1.6%**	**11.2%**
Non-Hispanic	13.8%	21.3%	19.5%	11.3%	9.5%	4.8%	1.2%	2.6%	1.5%	1.1%	10.2%
Hispanic	24.4%	41.3%	35.2%	21.8%	17.3%	10.0%	2.4%	5.1%	7.1%	6.6%	21.4%

Map V.5
Rate of HALs by Census Tract, 2004-2011
City of Oklahoma City
2004–2011 HMDA Data



Map V.6
Rate of HALs by Census Tract Since 2011
City of Oklahoma City
2012-2013 HMDA Data



As had been the case with loan denials to black applicants, black borrowers tended to receive HALs more often when they purchased homes outside of areas with high concentrations of black residents, as shown in Map V.7 on the following page. This is not to say that predatory style lending to black borrowers was uncommon in areas with high concentrations of black residents: more than 36.7 percent of loans issued to black residents in most tracts in the area to the east and northeast of the city center were HALs. However, higher HAL rates were observed scattered in the city center and to the south.

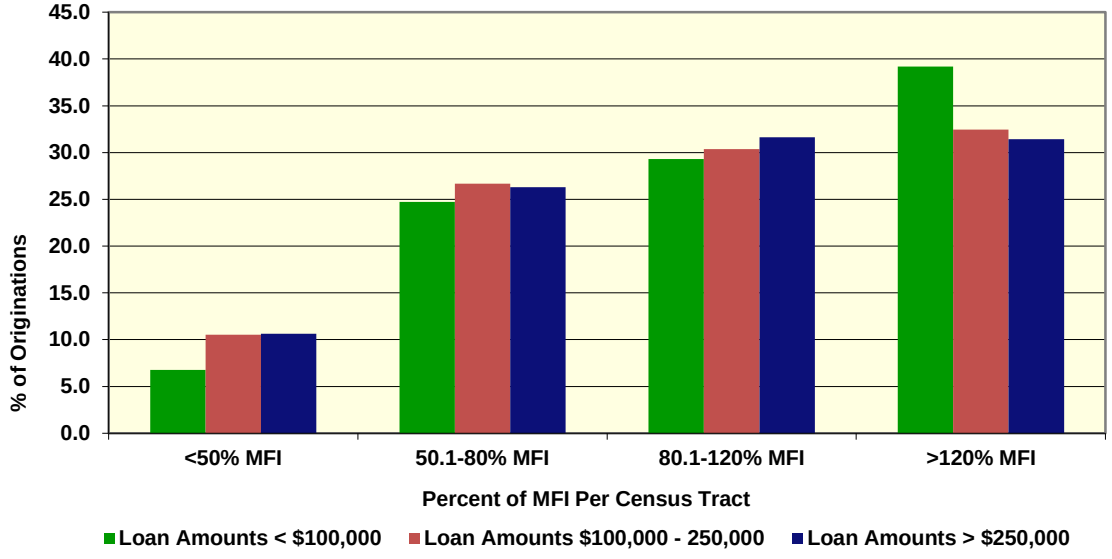
There was not a clear trend toward higher HAL rates for Hispanic borrowers in any specific part of the city center. However, there were some clusters of Census tracts with high rates of predatory style lending to Hispanic residents, as shown in Map V.8 on page 89. HALs were relatively common in the area to the south of the city center, which held high concentrations of Hispanic residents in 2000 and 2010. In addition, Hispanic borrowers received HALs at relatively high rates in several Census tracts in the western part of the city center.

COMMUNITY REINVESTMENT ACT DATA

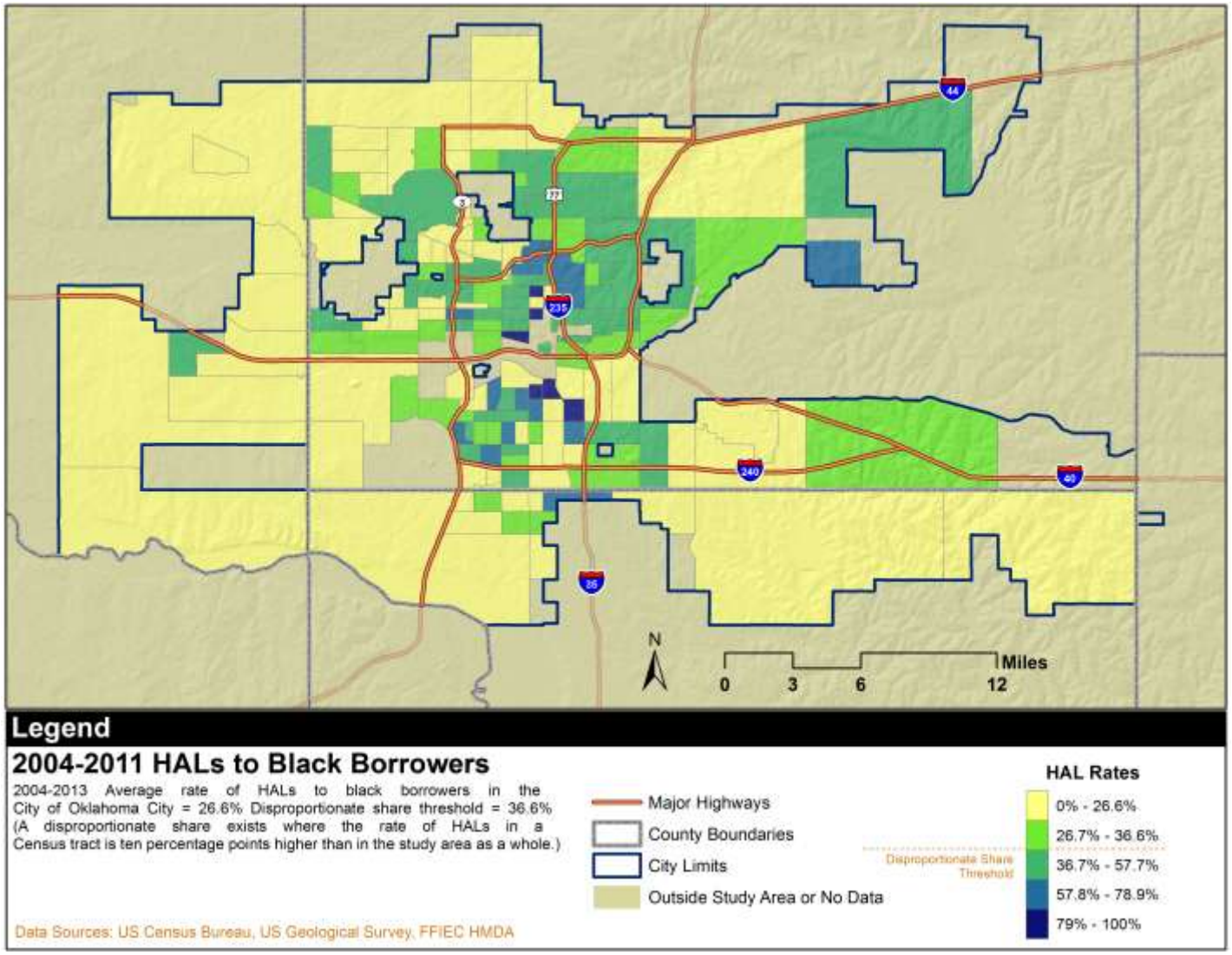
Economic vitality of neighborhoods can partly be measured through Community Reinvestment Act (CRA) data. According to these data, 199,936 small business loans were extended to businesses in the City of Oklahoma City during the period from 2000 to 2012. Of these, 73,024 loans went to businesses with annual revenues of less than $1 million. A majority of all loans, or 182,482 loans, were valued under $100,000. A total of $8,475,173 were lent in the city from 2000 through 2013. Tables with complete CRA data are presented in Appendix A.

Small business loans were also analyzed to determine the location of funding in relation to median family income (MFI) levels. Diagram V.2 below presents the distribution of small business loans by value and by percent of MFI by Census tract. As shown, relatively few loans went to lower-income Census tracts and the number of loans tended to increase with tract median income.

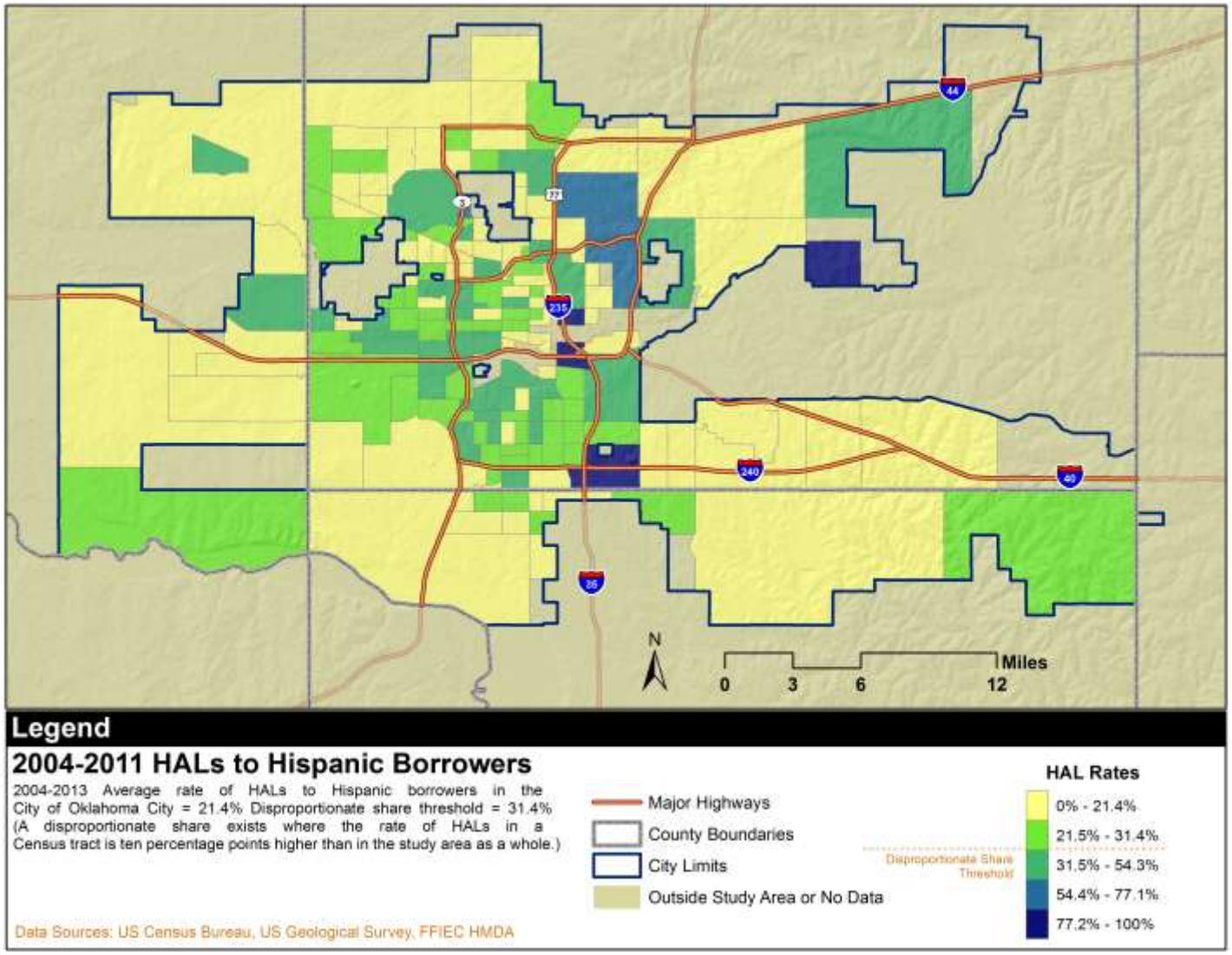
Diagram V.2
Percent of Small Business Loans Originated by Census Tract MFI
City of Oklahoma City
2000–2013 CRA Data



Map V.7
HALs to Black Applicants by Census Tract
City of Oklahoma City
2004-2011 HMDA Data



Map V.8
HALs to Hispanic Borrowers by Census Tract
City of Oklahoma City
2004–2011 HMDA Data



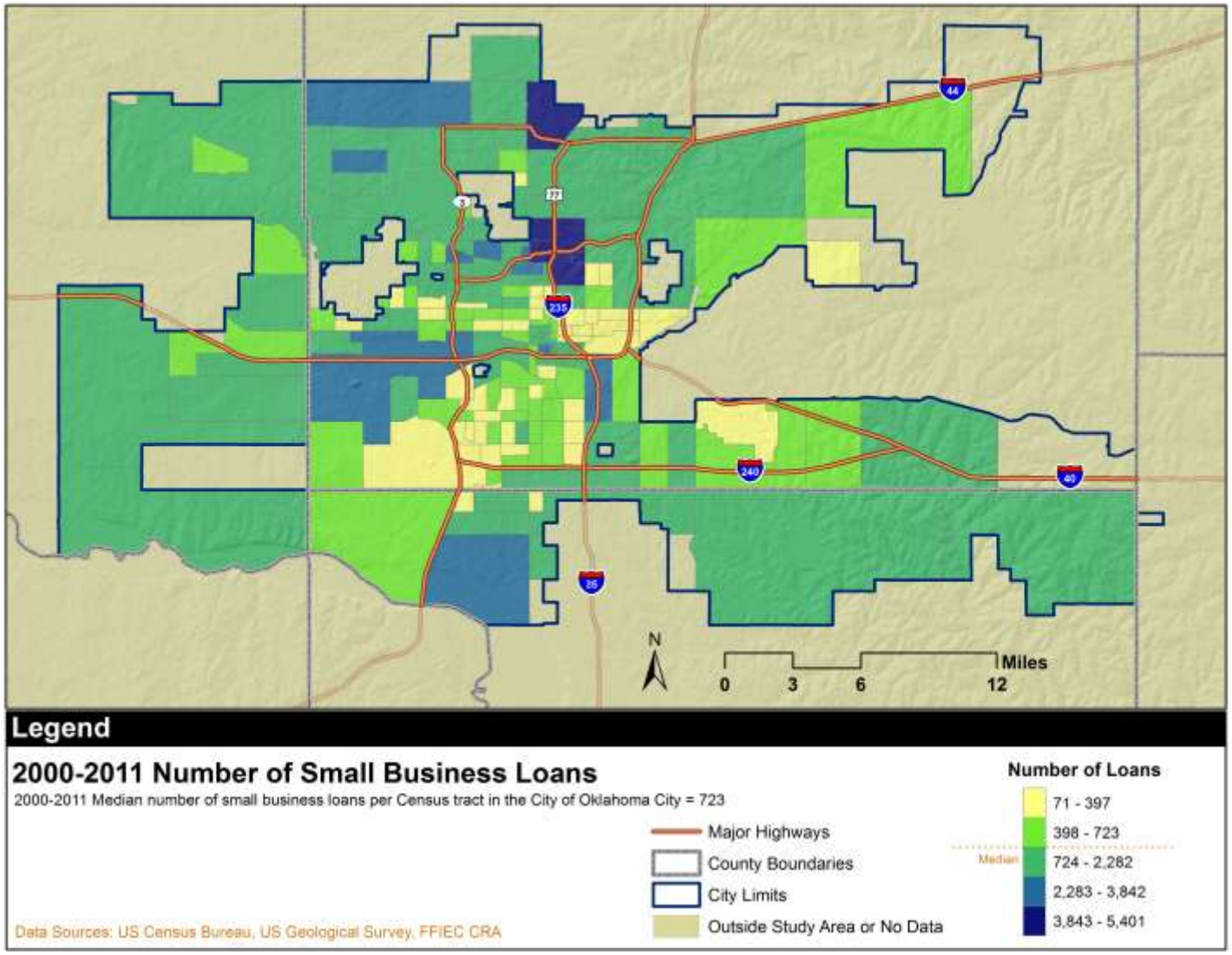
The median number of small business loans issued in city Census tracts from 2000 through 2011 was 723. During that time, the number of loans was at or below median throughout much of the areas to the east and south of the city center, as shown in Map V.9 on the following page, as well as areas to the immediate north of the city center. By contrast, the number of small business loans issued in Census tracts in the downtown area itself was at or above that median. However, the highest numbers of small business loans were issued in Census tracts near the interchange of Interstate 235 and Interstate 44, as well as in the large Census tract near the intersection of Interstate 235 and the John Kilpatrick Turnpike. In those areas, more than 3,800 individual loans were issued from 2000 through 2011.

In the two years since 2011, lending patterns have tended to follow the same general trend as was observed over the prior twelve years, as shown in Map V.10 on page 92. Census tracts in the city center have continued to receive greater than the median number of loans for 2012-2013, which was 71.5, and large tracts near the interchange of Interstate 235 and Interstate 44 have received a relatively large number of small business loans. By the same token, investment has continued to be relatively muted in Census tracts to the immediate east, north, and south of the city center.

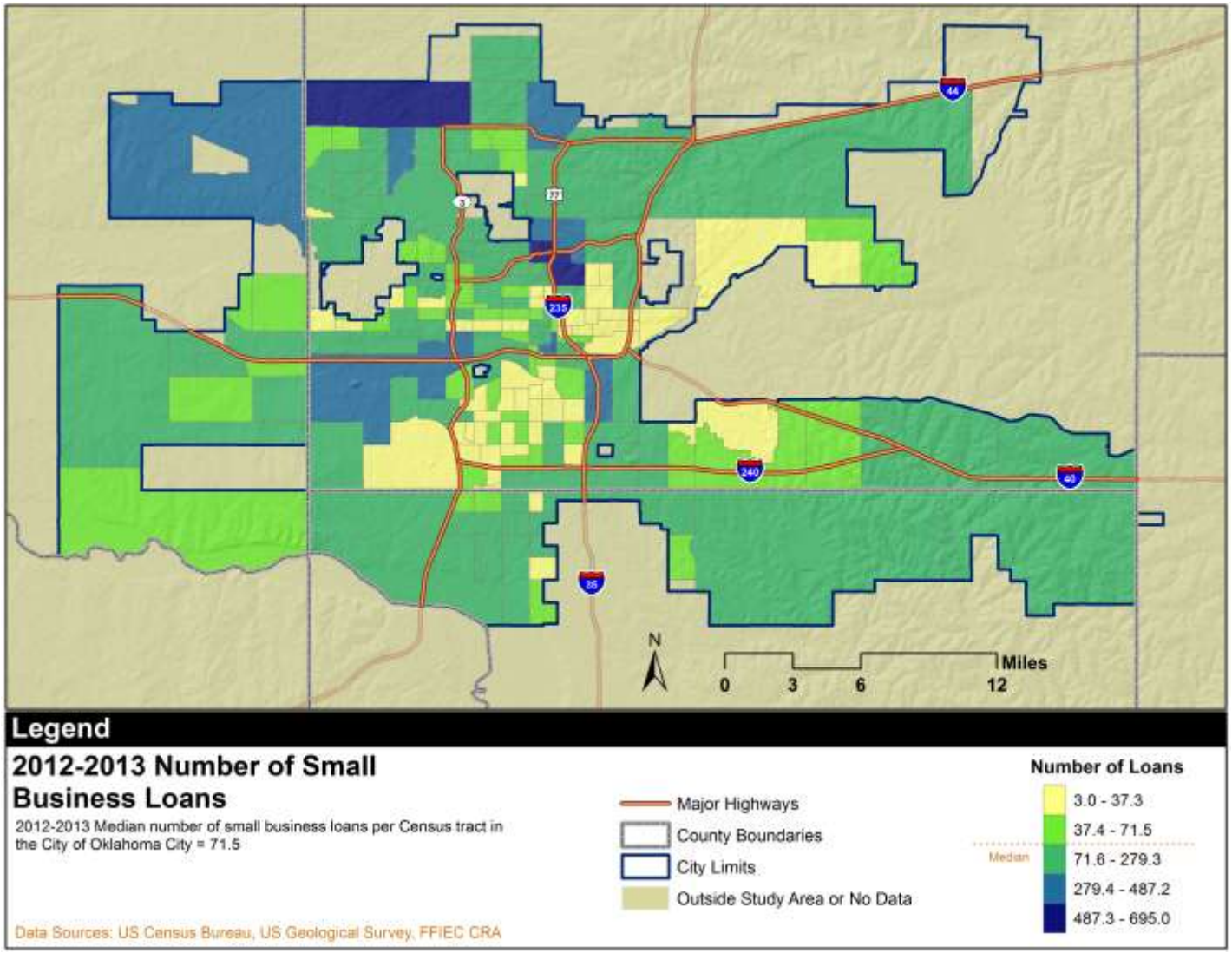
Unsurprisingly, areas that received relatively high numbers of loans from 2000 through 2011 also tended to receive more in loan dollars, as shown in Map V.11 on page 93. Such areas included the city center and areas directly to the west and southwest of the city center. The value of loans issued in these areas, and in the Census tracts surrounding the Interstate 235-Interstate 44 interchange, was greater than the $22,712 median for city Census tracts. By contrast, many tracts to the immediate east and south of the downtown areas received considerably less than that median figure.

Again, the same basic pattern was observed in the two years after 2011, as shown in Map V.12 on page 94. In those years, the greatest total value small business loans were observed in the Census tracts at the interchange of Interstate 235 and Interstate 44 and a large Census tract in the northwest of the city, and in one central Census tract. More than $40,000 in small business loans was issued in Census tracts in each of those Census tracts. Relatively little was lent in Census tracts to the east and south of the downtown area.

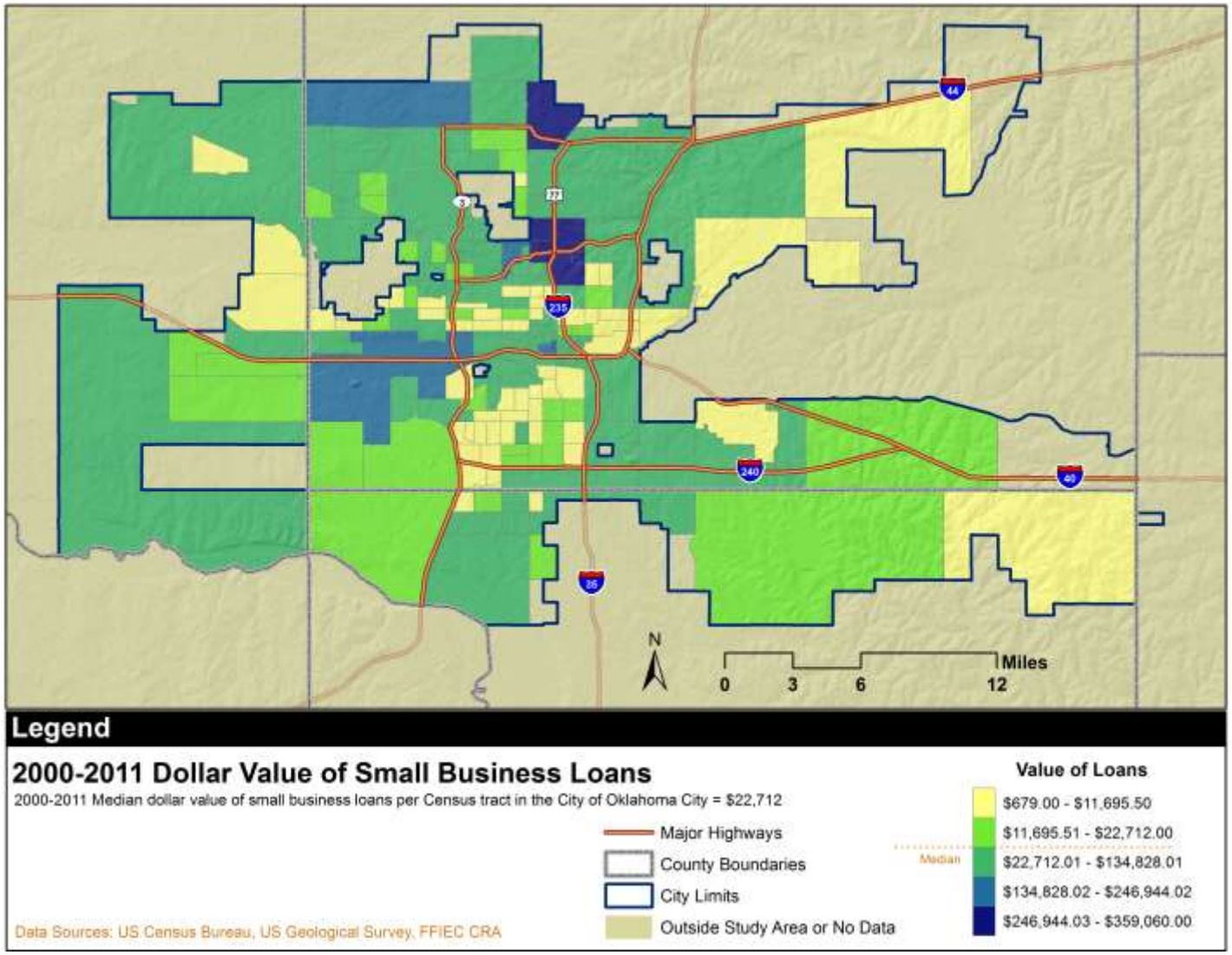
Map V.9
Number of Small Business, 2000-2011
City of Oklahoma City
2000–2011 CRA Data



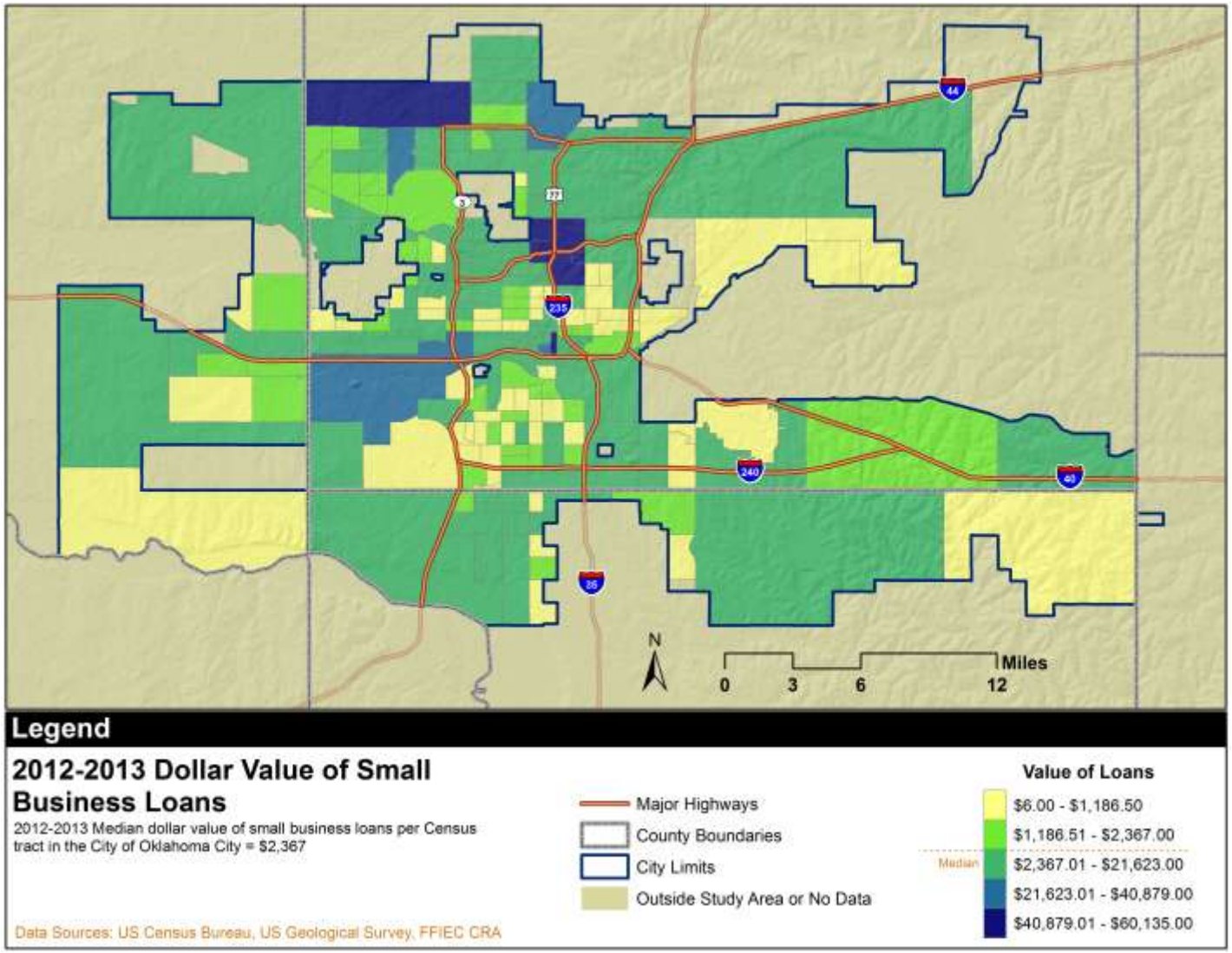
Map V.10
Number of Small Business, 2012 and 2013
City of Oklahoma City
2012-2013 CRA Data



Map V.11
Dollar Value of Small Business Loans, 2000-2011
City of Oklahoma City
2000–2011 CRA Data



Map V.12
Dollar Value of Small Business Loans Since 2011
City of Oklahoma City
2012-2013 CRA Data



FAIR HOUSING COMPLAINTS

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

HUD maintains records of complaints that represent potential and actual violations of federal housing law, as described previously in the Complaint Process Review. Table V.11 presents complaint data for the City of Oklahoma City from 2004 through 2012, categorized by complaint basis. Because a complainant (the person who has lodged the complaint) may allege to have suffered discrimination on more than one basis, there were 426 complaint bases cited in connection with the 325 complaints HUD received from city residents. The most common complaint bases were disability and race, cited in 141 and 130 complaints, respectively. Familial status was third, cited in 74 complaints.

Table V.11
Fair Housing Complaints by Basis
City of Oklahoma City
2004–2014 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Disability	5	11	11	7	13	20	15	22	14	15	8	141
Race	8	18	13	13	14	8	17	22	7	5	5	130
Family Status	4	4	8	3	8	10	5	20	5	4	3	74
Sex	2	1	5	4	6	2	5	8	3	3	1	40
National Origin	1	1	1	8	4	3	2	4			2	26
Retaliation			4		2	1	1		1			9
Religion				2		1		2			1	6
Total Bases	**20**	**35**	**42**	**37**	**47**	**45**	**45**	**78**	**30**	**27**	**20**	**426**
Total Complaints	16	28	30	33	35	38	34	54	20	22	15	325

The discriminatory issues relating to these complaints are presented in Table V.12 on the following page. Again, more than one issue may be cited in a single complaint; in total, 616 issues were cited in the 325 complaints lodged with HUD. The most common issue was discriminatory terms, conditions, privileges, or services and facilities, which was cited in 175 complaints. The next most common complaint pertained to Section 818 of the federal Fair Housing Act, which makes it illegal to try to prevent someone from exercising his or her right to fair housing through threats, coercion, or intimidation: discriminatory acts of this kind were cited in 136 complaints. Discrimination in the rental housing market was directly implicated in the next most common allegations, which concerned discrimination in terms, conditions, or privileges relating to rental, discriminatory refusal to rent, and discriminatory refusal to rent and negotiate for rental.

A complete version of this table with yearly complaint data is included in Appendix D as Table D.2.

Table V.12
Fair Housing Complaints by Issue
City of Oklahoma City
2004–2014 HUD Data

Issue	Total
Discriminatory terms, conditions, privileges, or services and facilities	175
Discriminatory acts under Section 818 (coercion, etc.)	136
Discrimination in term, conditions or privileges relating to rental	92
Discriminatory refusal to rent	51
Discriminatory refusal to rent and negotiate for rental	35
Failure to make reasonable accommodation	35
Discriminatory financing (includes real estate transactions)	11
Discrimination in terms, conditions, privileges relating to sale	10
Discriminatory refusal to sell and negotiate for sale	8
Discriminatory refusal to negotiate for rental	8
Non-compliance with design and construction requirements (handicap)	8
False denial or representation of availability - rental	5
Steering	5
Other discriminatory acts	5
Failure to permit reasonable modification	5
Discrimination in the appraising of residential real property	4
Discriminatory refusal to sell	3
Discrimination in the terms or conditions for making loans	3
Otherwise deny or make housing available	3
Discriminatory advertising, statements and notices	2
Discriminatory advertisement - rental	2
False denial or representation of availability - sale	2
Blockbusting - rental	2
Discriminatory refusal to negotiate for sale	1
Discrimination in making of loans	1
Discrimination in the selling of residential real property	1
Discriminatory brokerage service	1
Discrimination in services and facilities relating to sale	1
Discrimination in services and facilities relating to rental	1
Total Issues	**616**
Total Complaints	325

In more than half of the complaints lodged with HUD, investigation of the complaint established that there was no reason to believe that the complaint represented an instance of unlawful discrimination, and ended with a "no cause" determination, as shown in Table V.13 below. Another 49 complaints were conciliated or settled, and 33 ended in an "administrative closure". A complete version of this table with yearly complaint data is included in Appendix D as Table D.3.

Table V.13
Fair Housing Complaints by Closure Status
City of Oklahoma City
2004–2014 HUD Data

Closure Status	Total
No Cause	195
Conciliated / Settled	49
Administrative Closure	33
Withdrawal After Resolution	15
Cause (FHAP)	5
Open	28
Total Complaints	**325**

Table V.14 below presents data relating to complaints considered to have cause, which may include those that were found to have cause as well as those that were successfully conciliated or settled. Of the complaints lodged with HUD by Oklahoma City residents, 69 are considered to have cause. The most common bases cited in connection with these complaints were disability and race; which were cited in 28 and 24 complaints, respectively; and family status, cited in 16 complaints.

Table V.14
Fair Housing Complaints Found With Cause by Basis
City of Oklahoma City
2004–2014 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Disability		1	2	1	1	4	3	4	7	3	2	28
Race	2	4	2	3	2	3	2	2	3	1		24
Family Status			1		2	2		6	3	2		16
Sex			1	1	3		2	4	1	1		13
National Origin		1	1	2			1	2				7
Retaliation						1						1
Total Bases	**2**	**6**	**7**	**7**	**8**	**10**	**8**	**18**	**14**	**7**	**2**	**89**
Total Complaints	2	5	7	6	6	8	5	14	9	5	2	69

The types of issues cited in connection with complaints with cause are similar to those cited in complaints in general. As shown in Table V.15 below, discriminatory terms, conditions, privileges, or services and facilities was the most common allegation among complainants, cited in 38 complaints. The next most common complaints cited discriminatory acts under Section 818 and discrimination in terms, conditions, or privileges relating to rental; cited in 26 and 22 complaints, respectively. A complete version of this table with yearly complaint data is included in Appendix D as Table D.4.

Table V.15
Fair Housing Complaints Found With Cause by Issue
City of Oklahoma City
2004–2014 HUD Data

Issue	Total
Discriminatory terms, conditions, privileges, or services and facilities	38
Discriminatory acts under Section 818 (coercion, etc.)	26
Discrimination in term, conditions or privileges relating to rental	22
Discriminatory refusal to rent	14
Failure to make reasonable accommodation	8
Discriminatory refusal to negotiate for rental	4
Discriminatory refusal to rent and negotiate for rental	4
False denial or representation of availability - rental	2
Non-compliance with design and construction requirements (handicap)	2
Discriminatory refusal to sell and negotiate for sale	1
Discriminatory advertising, statements and notices	1
Discriminatory financing (includes real estate transactions)	1
Discrimination in services and facilities relating to rental	1
Otherwise deny or make housing available	1
Total Issues	**125**
Total Complaints	69

METROPOLITAN FAIR HOUSING COUNCIL

As discussed in **Section IV**, the Metropolitan Fair Housing Council accepts complaints from Oklahoma City residents who believe that they have been subjected to illegal discrimination in

the city's housing market. The 686 complaints included in this study include those citing discrimination on the basis of one of the protected classes cited in state or federal law, as well as complaints discrimination based on income source. These complaints were received during the period from 2009 through 2014. As in the case of housing complaints filed with HUD, more than one protected class may be cited in connection with a single complaint. The most common complaint that the MFHC received concerned discrimination on the basis of disability, followed by familial status, which were cited in 347 and 229 complaints, respectively. Third was race, cited in 113 complaints, as shown in Table V.16 below.

Table V.16
Protected Class by Year
City of Oklahoma City
Metropolitan Fair Housing Council of Oklahoma 2009 - 2014

Protected Class	2009	2010	2011	2012	2013	2014	Total
Disability	34	33	66	100	111	3	347
Familial Status	10	21	74	66	57	1	229
Race	5	9	17	75	7	.	113
Income Source	.	3	14	23	26	.	66
Sex	1	2	4	7	9	.	23
National Origin	2	2	8	2	5	.	19
Marital Status	.	.	.	4	1	.	5
Age	.	.	1	1	.	1	3
Religion	.	.	1	1	.	.	2
Total Classes	**52**	**70**	**185**	**279**	**216**	**5**	**807**
Total Complaints	52	61	148	242	179	4	686

In most cases, those who filed a complaint with the MFHC were counseled on their housing rights, as shown in Table V.17 on the following page. Nearly twenty percent of complaints lodged with the organization were filed with HUD, indicating that these were complaints that amounted to bona fide fair housing complaints in the judgment of the MFHC. Over 13 percent of cases were conciliated, and a similar number were resolved to the benefit of the complainant. Note that more than one outcome listed below is possible for each complaint.

Table V.17
Results by Year
City of Oklahoma City
Metropolitan Fair Housing Council of Oklahoma 2009 - 2014

Results	2009	2010	2011	2012	2013	2014	Total
Counseled Client on Housing Rights	.	44	135	240	179	4	602
Filed with HUD	19	21	13	68	5	.	126
Conciliated	12	11	20	23	25	.	91
Case Resolved to Benefit Client	.	.	18	38	32	1	89
Retained Safe Affordable Housing	.	1	16	33	31	1	82
Case Closed with Advice	.	2	19	23	2	.	46
Client Lost Interest/Contact	1	10	7	15	3	.	36
Obtained Safe Affordable Housing	.	.	22	2	.	.	24
Referred to Attorney/Legal Aid	.	.	5	4	4	.	13
Investigated / No Evidence Found	.	.	2	4	7	.	13
HUD Conciliated	2	.	.	7	1	.	10
Case Resolved	.	1	4	1	1	.	7
Landlord Tenant Problem	4	1	.	.	.	.	5
Referred to Another Agency	.	.	3	.	1	.	4
OHRC Conciliated	2	.	.	.	.	.	2
Other	2	9	.	.	.	.	11
Total Results	**42**	**100**	**264**	**458**	**291**	**6**	**1,161**
Total Complaints	52	61	148	242	179	4	686

Female complainants accounted for more than half of the fair housing complaints filed with MFHC between 2009 and the present, as shown in Table V.18 on the following page. Black female complainants lodged 279 complaints with the organization, while white female complainants lodged 217. Black males accounted for the next largest class of complaints, having lodged 67 during the time period in question, followed by white males, who filed 53 complaints. Hispanic residents made up a relatively small share of complainants.

Table V.18
Race/Ethnicity and Gender by Year
City of Oklahoma City
Metropolitan Fair Housing Council of Oklahoma 2009 - 2014

Race/Gender	2009	2010	2011	2012	2013	2014	Total
Black Female	16	25	47	108	83	.	279
White Female	20	22	47	56	70	2	217
Black Male	4	6	12	40	4	1	67
White Male	3	5	15	17	12	1	53
Hispanic Female	2	3	15	8	8	.	36
Hispanic Male	1	.	3	4	2	.	10
Native American Female	.	.	2	7	.	.	9
Other	5	.	3	1	.	.	9
Native American Male	.	.	1	1	.	.	2
Other Female	1	.	1	.	.	.	2
Asian Female	.	.	1	.	.	.	1
Black Hispanic Female	.	.	1	.	.	.	1
Total Race/Gender	**52**	**61**	**148**	**242**	**179**	**4**	**686**
Total Complaints	52	61	148	242	179	4	686

Fair Housing Survey – Private Sector Results

Additional evaluation of fair housing within the City of Oklahoma City was conducted via an online survey of stakeholders that began in August 2014. The purpose of the survey, a relatively qualitative component of the AI, was to gather insight into the knowledge, experiences, opinions, and feelings of stakeholders and interested citizens regarding fair housing. Results and comments related to the questions in the private sector are presented in the following narrative, and additional survey results are discussed in **Sections VI** and **VII**.

The 2014 City of Oklahoma City Fair Housing Survey was completed by 84 persons and was conducted entirely online. Individuals solicited for participation included representatives of housing groups, minority organizations, disability resource groups, real estate and property management associations, banking entities, and other groups involved in the fair housing arena. Most questions in the survey required simple "yes," "no," or "don't know" responses, although many questions allowed the respondent to offer written comments. When many respondents reported that they were aware of questionable practices or barriers in a particular industry, or when common issues were identified in the additional commentary, such responses were indicative of potential impediments to fair housing choice.

Numerical tallies of results to survey questions and summaries of commentary from the private sector portion of the survey are presented in this section. A complete list of written responses is available in Appendix B.

FAIR HOUSING IN THE PRIVATE SECTOR

In order to address perceptions of fair housing in the City of Oklahoma City's private housing sector, survey respondents were asked to identify their awareness of possible housing discrimination issues in a number of areas within the private housing sector, including the:

- Rental housing market,
- Real estate industry,
- Mortgage and home lending industry,
- Housing construction or accessible housing design fields,
- Home insurance industry,
- Home appraisal industry, and
- Any other housing services.

If respondents indicated that they were aware of possible discriminatory issues in any of these areas, they were asked to further describe issues in a narrative fashion. Tallies for each question are presented in Table V.19 below. Awareness of barriers to fair housing choice in each of the industries or fields mentioned was typically low among those who answered the questions. Only two to five respondents claimed to be aware of barriers to fair housing choice in any of these areas, while the percentage of respondents who maintained that they were unaware of any such barriers ranged from 50 to 54.8 percent, excluding missing responses. However, the proportion of respondents who selected "don't know" was also large, ranging from 40 to 45 percent, suggesting that a large proportion of respondents did not feel that they knew enough to comment one way or the other. Such findings are consonant with the portrait of housing discrimination as often subtle and difficult to detect, which is reflected in the review of literature presented in **Section III**.

Table V.19
Barriers to Fair Housing in the Private Sector
City of Oklahoma City
2014 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?	5	31	26	22	84
The real estate industry?	2	34	26	22	84
The mortgage and home lending industry?	5	32	25	22	84
The housing construction or accessible housing design fields?	3	30	27	24	84
The home insurance industry?	4	32	25	23	84
The home appraisal industry?	5	30	25	24	84
Any other housing services?	3	30	27	24	84

Respondents who indicated that they were aware of barriers to fair housing choice in any of the areas mentioned above were invited to provide additional commentary on each question. Due to the low number of affirmative responses to each question, commentary on any one question was limited. However, several themes emerged in consideration of the commentary from this section of the survey as a whole: one was discrimination against those seeking housing on the basis of race and disability. In commenting on accessibility requirements in home construction, one commenter maintained that "violations are common".

2014 Oklahoma City Attorney Survey

As part of the effort to characterize the types of recourse that are available to Oklahoma City residents who feel that they have been subjected to illegal discrimination in the city's housing market, local attorneys were contacted and asked a series of questions concerning their experience handling cases of discrimination in the housing market. Responses from attorneys who participated in the survey singled out the rental housing market as having generated the greatest number of complaints. As was observed in analysis of complaints lodged with HUD and the MFHC, these attorneys also observed disability to be a relatively common basis for fair housing complaints.

The attorneys surveyed in the study saw a need for increased outreach and education, though one noted that the MFHC offers home buyer classes and "constant" training seminars. Another noted that it is often difficult to secure the participation of rental tenants in training seminars, though they would benefit from a greater understanding of fair housing laws and policies.

When asked about the outcomes of cases, the attorneys indicated that resolution of complaints through conciliation or settlement was a relatively common outcome. Several attorneys noted that the HUD process is time-consuming, and one indicated that he had elected to take a case directly to court and bypass the process altogether, perceiving that the situation in which his client found him or herself needed to be resolved more quickly than could the HUD process.

Summary

Oklahoma City residents or prospective residents applied for 192,326 home purchases loans from 2004 through 2013. A majority of these, or 171,926, were intended to finance homes in which the owners planned to live themselves. Applications submitted in the City led to 85,618 loan originations and 16,806 denials, for an average denial rate of 16.4 percent. Applications were denied more frequently when the home in question was located close to the city center, or when it was located in areas to the northeast and southwest of the city center. Loan denials were also denied more frequently to female than to male applicants, to black applicants than to white applicants, and to Hispanic applicants than to non-Hispanic applicants. However, many of the areas in which black applicants were most frequently turned down for loans lay outside of areas with relatively high concentrations of black residents. More than a third of loan applications from Hispanic residents were denied in areas throughout the city center.

Credit history and debt-to-income ratio were the most common identified factors in loan denials in the city. Though credit history has consistently been a primary factor in loan denials, the importance of debt-to-income ratio has grown since 2004, when less than ten percent of loans were denied primarily due to debt-to-income ratio. By 2011, nearly a fifth of loans were denied primarily for that reason. Unsurprisingly, income was related to loan denial rates: the higher the applicant's income, the less likely he or she would be denied. However, racial and ethnic discrepancies in loan denial rates persisted even when applicants of different races were similarly situated with respect to income. Although income was equal in those cases, there were likely other factors that made some applications stronger than others. However, it should be of concern that those denial rates break along racial and ethnic minority lines.

In some cases, applicants who were able to secure a loan were issued loans with high annual percentage rates (HALs). Over 11 percent of all loans issued in the city from 2004 through 2013 were HALs, which are considered predatory in nature. Like loan denials, HALs were issued disproportionately to black and Hispanic borrowers, and were most common in the parts of the city in which those residents were disproportionately concentrated. However, black borrowers themselves were issued HALs with relative frequency throughout the city center, as were Hispanic applicants. In the case of black residents, HALs tended to appear more frequently outside of areas in which black residents were disproportionately concentrated in 2000 and 2010.

Geographic areas relatively low median incomes also tended to receive relatively little in the way of small business lending, according to data gathered under the Community Recovery Act. The 199,936 small business loans originated in the city between 2000 and 2013 tended to go to Census tracts with higher median family incomes, including downtown Census tracts and large tracts near the interchange of Interstate 235 and Interstate 44; the latter of which encompassed the Chesapeake Energy Corporation's Oklahoma City campus. As one might expect, the $8,475,173 in loan dollars issued in the city followed a similar geographic distribution.

The status of fair housing in the city was further evaluated through a review of housing discrimination complaints filed with HUD and the Metropolitan Fair Housing Council (MFHC). Disability was the most common perceived basis for discrimination in both datasets, cited in 141 HUD complaints and 347 complaints filed with the MFHC.[52] The next most commonly perceived basis for discrimination among HUD complaints was race, followed by family status. In complaints lodged with MFHC, familial status was the second most common complaint basis. Discrimination in the rental housing market was relatively common among HUD complaints.

Awareness of barriers to fair housing choice in the private sector was limited among respondents to the Fair Housing Survey: at most, one respondent in twelve reported being aware of barriers to fair housing choice in any of the industries or services mentioned. Those who did perceive discrimination in the private housing market cited several issues in comments submitted with the survey, including discrimination in the housing market on the basis of race and disability. In addition, those who responded to these questions with "don't know" represented a large share of responses to each question, suggesting that awareness or understanding of issues relating to fair housing is limited in the city.

Results of a survey of Oklahoma City attorneys suggest that complaints from Oklahoma City residents who believe that they have been subjected to illegal discrimination during their housing search tend to involve the rental housing market more often than any other market, and often pertain to discrimination on the basis of disability. These attorneys also highlighted the need for additional education among housing providers and residential tenants.

[52] Note that some of the complaints received by MFHC are referred to HUD, so some of the same complaints may appear in both datasets.

SECTION VI. FAIR HOUSING IN THE PUBLIC SECTOR

While the previous section presented a review of the status of fair housing in the private sector, this section will focus specifically on fair housing in the public sector. The U.S. Department of Housing and Urban Development (HUD) recommends that the AI investigate a number of housing factors within the public sector, including the placement of public housing as well as its access to government services.

PUBLIC SERVICES

Community features, including public services and facilities, and the location of public and assisted housing are essential parts of good neighborhoods, leading to a more desirable community and more demand for housing in these areas.

HOME Assisted Rental Housing

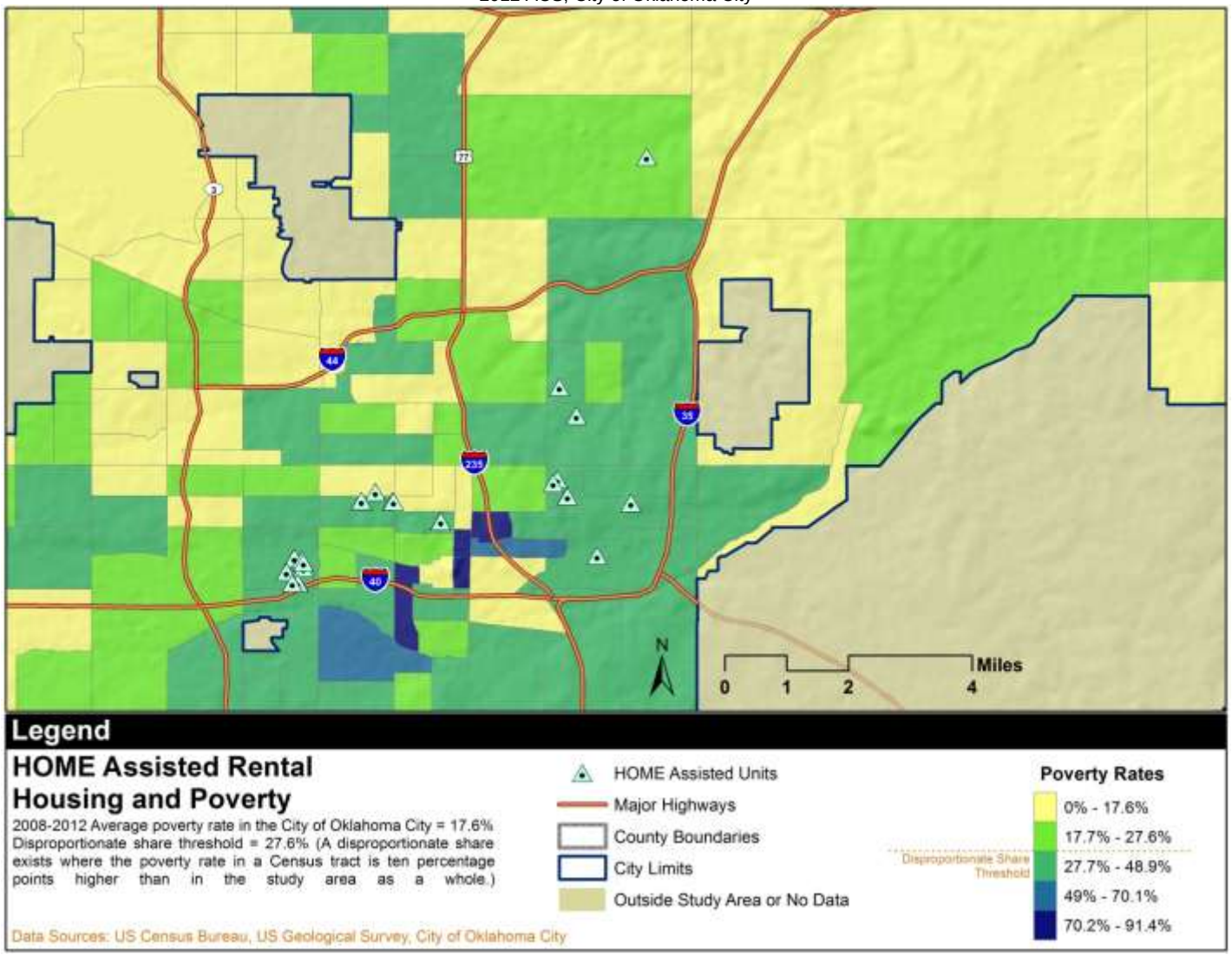
Funding available through HUD's HOME Investment Partnerships Program (HOME) can be used to build, buy, or rehabilitate housing units, or for rental assistance. Rental assistance through the HOME program is subject to limits on rent and incomes. For example, ninety-percent of families that benefit from HOME rental assistance in an area must have incomes that are at or below the HUD-adjusted median family income for that area. Additionally, at least 20 percent of units in rental projects subsidized by HOME rental assistance must be earning less than 50 percent of that HUD-adjusted median. HOME funds in Oklahoma City are administered by the city's Housing and Community Development Division.

With the exception of a single unit located to the north of Highway 44, all HOME Assisted Rental Housing units were located in and around the city center, as shown in Map VI.1 on the following page. Several clusters of these units were observed through that area, including a cluster of 16 units to the southeast of State Fair Park, 9 units to the southwest of Mesta Park, and 13 units at a single address to the north of the downtown area. Almost all of these units were located in Census tracts with poverty rates ranging from 27.7 to 48.9 percent, which is above the disproportionate share threshold. The sole exception was the single outlying unit discussed above; however, even that unit lay in a Census tract with an above-average poverty rate.

Section 8 Housing Vouchers

Section 8 Housing Vouchers are federally funded housing subsidies that are administered in Oklahoma City by the Oklahoma City Housing Authority (OCHA). Unlike Project-Based Section 8 assistance, which subsidizes specific properties, vouchers are portable: recipients can choose where to live as long as the landlord accepts the vouchers and the unit meets a certain set of HUD-defined criteria, including maximum income limits and the "reasonableness" of the monthly rent charges as compared to units on the private market. The OHCA maintains a list of landlords who accept Section 8 vouchers which is available to those who qualify for the subsidy. The program covers monthly rental costs minus the tenant's contribution, which is not to exceed thirty percent of his or her monthly adjusted income, or ten percent of monthly unadjusted gross income.

Map VI.1
HOME Assisted Rental Units and 2012 Poverty
City of Oklahoma City
2012 ACS, City of Oklahoma City



Section 8 assisted units were more numerous, and more widely distributed, than units receiving HOME Assisted rental funding, as shown in Map VI.2 on the following page. Nevertheless, there was still a tendency for such units to be concentrated in the city center, and in Census tracts with above-average shares of poverty throughout the city. In fact, of the 3,451 units that were plotted on this map, 85.4 percent were located in tracts with above-average shares of poverty, or in which the poverty rate exceeded 17.6 percent. In addition, approximately 91 percent of Section 8 assisted housing was located within Census tracts with above-average shares of Hispanic or black residents.

Public Housing

Public Housing units are owned and managed by the OCHA, and include scattered home sites as well as apartment complexes throughout the city. As in the case of Section 8 vouchers, eligibility for Public Housing is subject to income limits based on family size. However, the income limits for Public Housing are higher than those for Section 8 Housing, so those who earn too much to qualify for Section 8 vouchers may still qualify for Public Housing. Units available through Public Housing include Family Properties and Senior Properties.

Like Section 8 Housing and HOME Assisted units, these units also tended to be located in Census tracts with above-average poverty rates, as shown in Map VI.3 on page 109. Of the 3,046 Public Housing units mapped for this study, 2,927 were located in Census tracts with poverty rates that exceeded the average rate, or 96.1 percent. Hispanic residents were concentrated in areas to the southwest of the city center, and black residents in Census tracts to the east and northeast of the city center. Both of these areas had large clusters of Public Housing units. In addition, 48.9 percent of public housing units were located in Census tracts with above-average concentrations of black residents.

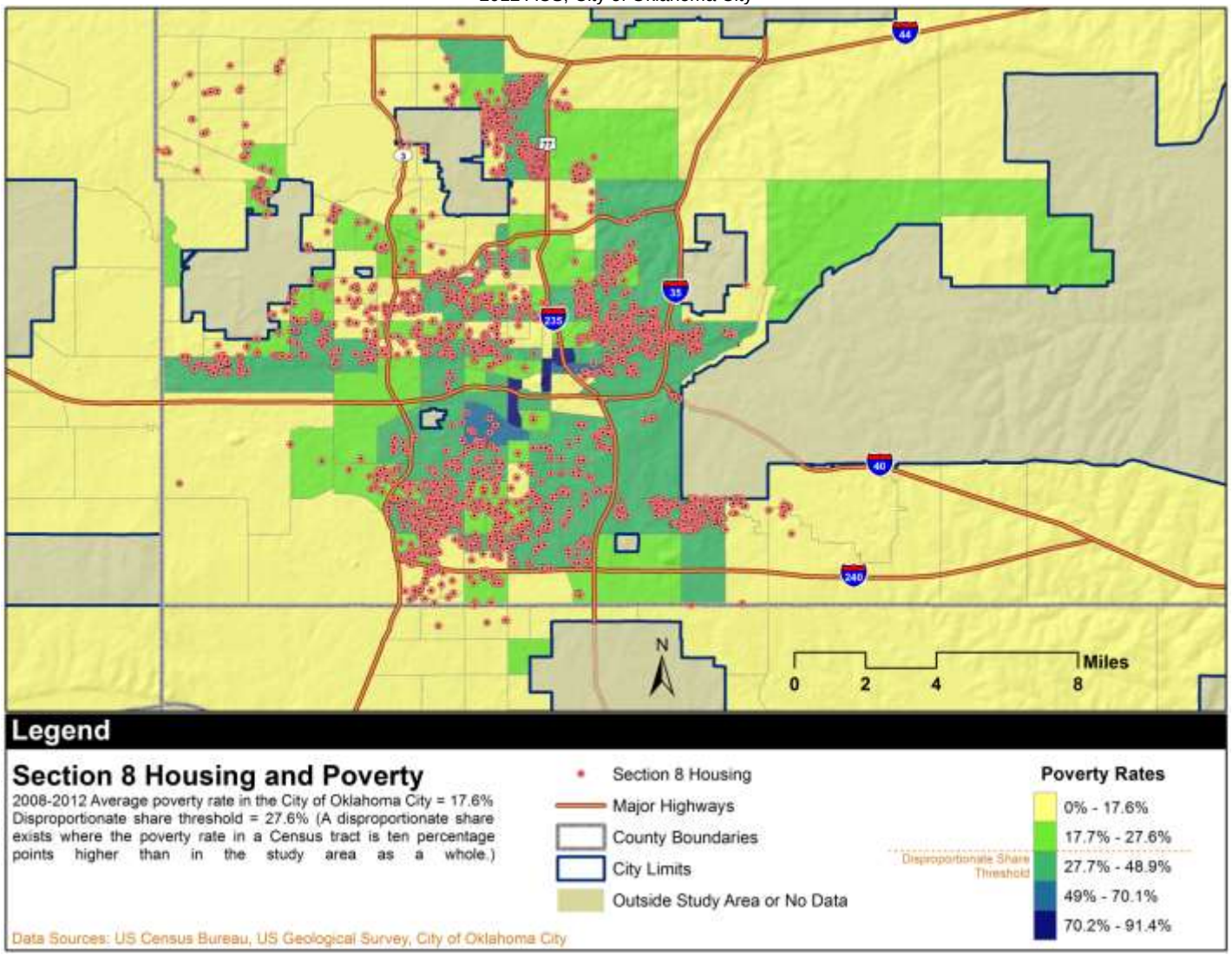
Down Payment Assistance

Down Payment Assistance (DPA) is funded through the HOME Program. Under current program guidelines, those who qualify for DPA can receive up to $15,000 in down payment assistance for units located within targeted areas of the city, though available assistance has differed in prior years. Down payment assistance may be used for down payments or with closing costs, and is subject to income limits. Those who receive DPA must attend Homebuyer Education classes and receive a certificate of completion from the class. [53]

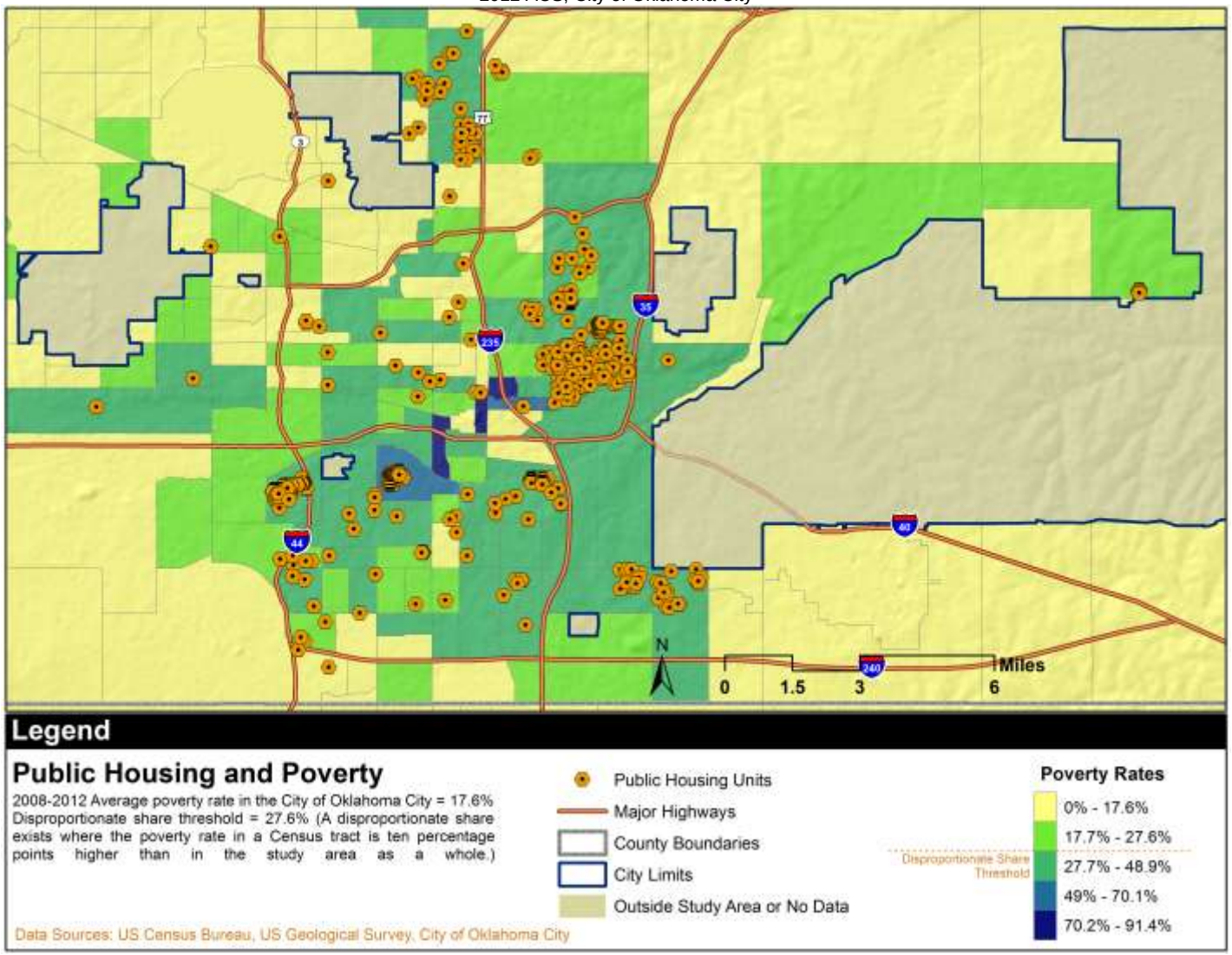
Units that were subsidized through DPA also tended to be concentrated in and around the city center, though a cluster of approximately 80 units was observed in the neighborhood of Hope Crossing, one of the current DPA target areas. As shown in Map VI.4 on page 110, these units also tended to be concentrated in areas with above-average poverty rates: of the 247 DPA units included in the map, 219 were located in areas with above average shares of poverty, or 88.7 percent.[54] However, these units were largely absent from Census tracts in which the poverty rate was 49 percent or above.

[53] For more information on program guidelines and city target areas, see "Housing Progrram". Oklahoma City Government. Website. Accessed January 21, 2015 from https://www.okc.gov/planning/housing/index.html.
[54] Note: Areas targeted for homebuyer assistance through the DPA, which have generally been located within the Neighborhood Revitalization Strategy Area, include a majority of the city's low-income Census tracts. See *2010-2015 Oklahoma City Consolidated Plan*.

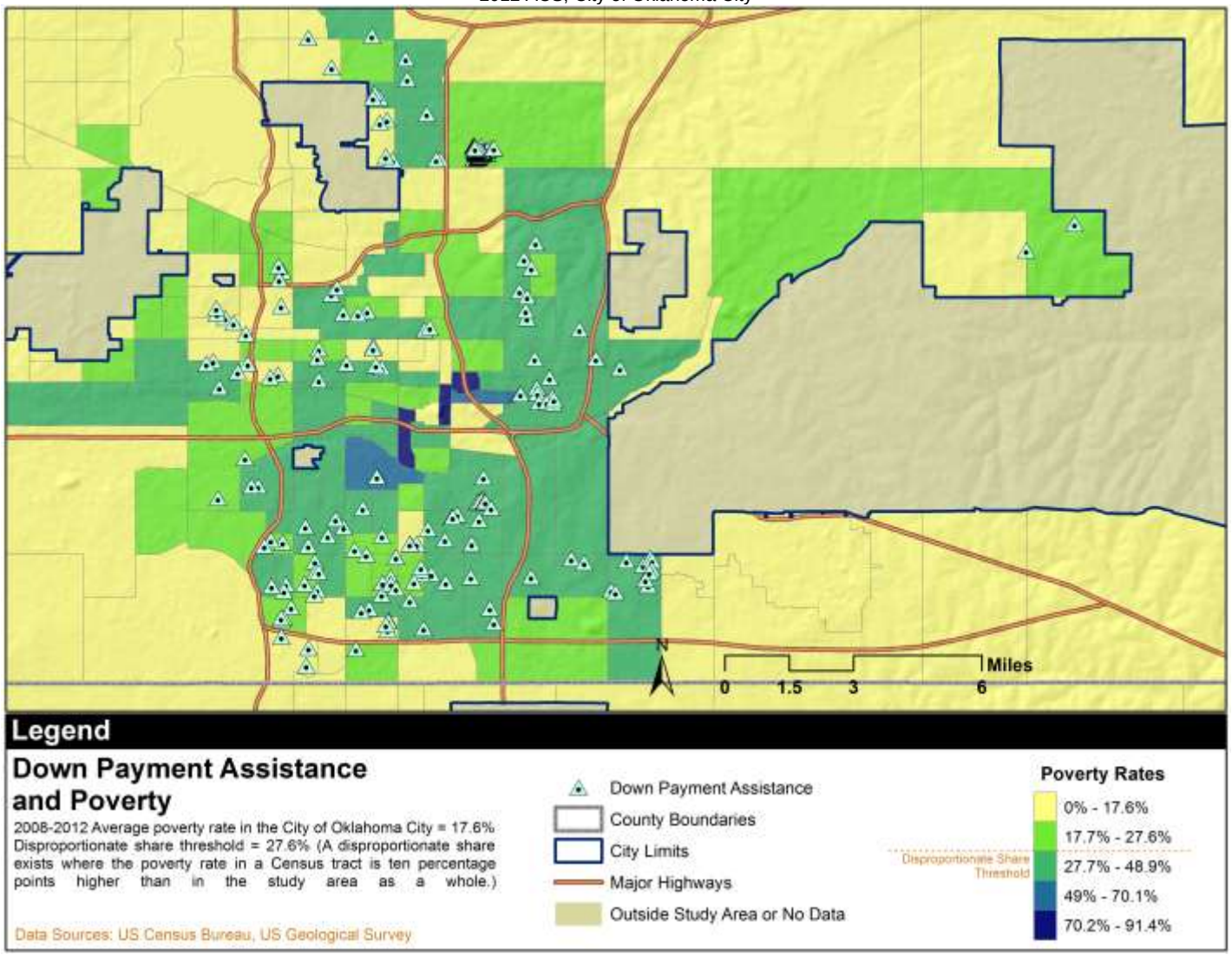
Map VI.2
Section 8 Housing Vouchers and 2012 Poverty
City of Oklahoma City
2012 ACS, City of Oklahoma City



Map VI.3
Public Housing Units and 2012 Poverty
City of Oklahoma City
2012 ACS, City of Oklahoma City



Map VI.4
Down Payment Assistance and 2012 Poverty
City of Oklahoma City
2012 ACS, City of Oklahoma City



The racial and ethnic composition of assisted housing units in the city is presented in Table VI.1 below. Though black residents accounted for 15.1 percent of the city's population, these residents accounted for 21.1 to 63.2 percent of residents of assisted housing units. Similarly, the share of Hispanic residents in assisted housing units exceeded the share of Hispanic residents in the city in some cases (though these residents tended to be underrepresented in Section 8 and HOME Assisted Rental housing). The fact that residents of assisted housing tend to be people of color entails that concentration of these units in a particular area has the potential to increase the concentration of minority residents in that area.

Table VI.1
Assisted Housing Units by Race/Ethnicity
City of Oklahoma City
2014 City of Oklahoma City

	Race						Ethnicity	
Program*	**White**	**Black**	**American Indian/Alaska Native**	**Asian**	**Other****	**Missing**	**Hispanic**	**Total Units**
Down Payment Assistance-CAA	51.1%	39.9%	0.0%	2.2%	0.0%	6.7%	22.8%	**268**
Down Payment Assistance-NHS	41.4%	21.1%	0.4%	3.0%	11.6%	22.4%	32.8%	**232**
HOME Assisted Rental Housing	62.9%	22.9%	8.6%	2.9%	2.9%	0.0%	14.3%	**70**
Public Housing	49.6%	41.1%	4.7%	1.3%	0.0%	3.2%	19.8%	**3,065**
Section 8 Housing Vouchers	32.3%	63.2%	3.4%	1.1%	0.0%	0.0%	4.2%	**3,699**
% Population (2010 Census)	**62.7%**	**15.1%**	**3.5%**	**4.0%**	**14.6%***	**-**	**17.2%**	

* Some units may be served by more than one program
** Includes residents who identified as belonging to two or more races

Fair Housing Survey – Public Sector Results

As mentioned previously, further evaluation of the status of fair housing within City of Oklahoma City was conducted via an online 2014 Fair Housing Survey, which was completed by 84 stakeholders and citizens. Those solicited for participation included a wide variety of individuals in the fair housing arena. Most questions in the survey required "yes," "no," or "don't know" responses, and many allowed the respondent to offer written comments. While the numerical tallies of results are presented in this section, along with summaries of some comment-heavy questions, a complete list of written responses is available in Appendix B. Other survey results are also discussed in **Sections V** and **VII**.

Fair Housing in the Public Sector

Public sector effects on housing can be complex and varied. The questions in this section of the survey asked respondents to think about possible barriers to fair housing choice within very specific areas of the public sector, as follows:

- Land use policies,
- Zoning laws,
- Occupancy standards or health and safety codes,
- Property tax policies,
- Permitting processes,
- Housing construction standards,

- Neighborhood or community development policies,
- Access to government services, and
- Any other public administrative actions or regulations.

If respondents indicated affirmatively that they were aware of possible discriminatory issues in any of these areas, they were asked to further describe issues in a narrative fashion. Tallies for each question are presented in Table VI.2 below. As had been the case with questions concerning barriers to fair housing in the private sector, many respondents skipped these questions and the number of affirmative responses was typically relatively low. In this connection, limited access to government services was an unusually salient barrier to fair housing choice in the city: 14 respondents claimed to be aware of barriers to fair housing choice in this area, representing over a quarter of those who responded to the question.

By contrast, relatively few respondents claimed to be aware of barriers to fair housing choice in land use policies, housing construction standards, property tax policies, the permitting process, housing and construction standards, neighborhood or community development policies, and public administrative actions or regulations—less than ten percent of respondents in each case. Between 10 and 15 percent of respondents maintained that they were aware of barriers to fair housing choice in zoning laws and occupancy standards.

As in the section of the survey pertaining to the private sector, commentary on barriers to fair housing choice in the public sector was limited. There were some common concerns among those who did provide additional commentary, including NIMBYism, discriminatory effects of zoning laws and land use decisions, and transportation. NIMBYism was especially salient among those who detected barriers to fair housing choice in land use and zoning policies, where neighborhood opposition to group homes or apartment complexes was perceived to bar such projects from certain areas of the city. The challenges perceived in the city's transit system can be summarized by quotation of one respondent, who maintained that "almost all access requires a personal vehicle in Oklahoma City."

Table VI.2
Barriers to Fair Housing in the Public Sector
City of Oklahoma City
2014 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?	5	30	23	26	84
Zoning laws?	8	28	22	26	84
Occupancy standards or health and safety codes?	8	27	22	27	84
Property tax policies?	4	26	27	27	84
Permitting process?	5	29	24	26	84
Housing construction standards?	3	27	27	27	84
Neighborhood or community development policies?	5	25	28	26	84
Limited access to government services, such as transportation or employment services?	14	24	19	27	84
Public administrative actions or regulations?	4	27	27	26	84

SUMMARY

The assessment of affirmatively furthering fair housing in Oklahoma City's public sector included analysis of public assisted housing units, transportation networks, and data gathered

through the 2014 Oklahoma City Fair Housing Survey. Data from these sources underscores some of the challenges to affirmatively furthering fair housing present in public policy in the city. Specific examples of such challenges include the placement of public assisted housing units in the city and NIMBYism.

Public assistance in provided in the housing market through HOME Assisted Rental Housing, Section 8 Housing Vouchers, Public Housing, and Down Payment Assistance. The first three programs offer subsidized rent to Oklahoma City residents, and are subject to income restrictions, which vary according to the program. Down Payment Assistance is available to homebuyers who purchase homes in certain areas of the city, and who participate in homebuyer education classes. Analysis of the geographic distribution of these units within the city reveals that they tend to be concentrated in areas of the city with relatively high rates of poverty and large shares of minority residents.

Results from the Public Sector portion of the 2014 Oklahoma City Fair Housing Survey reveal that perception of barriers to fair housing choice was limited in most of the public policy arenas mentioned. However, several survey participants perceived the effect of NIMBYism in land use and zoning policies, often pertaining to the placement of group housing and apartment complexes. Transportation was also a concern among survey respondents, who felt that the current transit network was not sufficient to meet the needs of the city's residents, particularly those without their own means of transportation.

SECTION VII. PUBLIC INVOLVEMENT

This section discusses analysis of fair housing in the City of Oklahoma City as gathered from various public involvement efforts conducted as part of the AI process. Public involvement feedback is a valuable source of qualitative data about impediments, but, as with any data source, citizen comments alone do not necessarily demonstrate the existence of citywide impediments to fair housing choice. However, survey and forum comments that support findings from other parts of the analysis reinforce findings from other data sources concerning impediments to fair housing choice.

FAIR HOUSING SURVEY

As discussed in previous sections, a 2014 Fair Housing Survey comprised a large portion of the public involvement efforts associated with the development of the 2014 AI. While data from the survey regarding policies and practices within the private and public sectors have already been discussed, the remaining survey findings are presented below.

The purpose of the 2014 Fair Housing Survey, a relatively qualitative component of the AI, was to gather insight into knowledge, experiences, opinions, and feelings of stakeholders and interested citizens regarding fair housing as well as to gauge the ability of informed and interested parties to understand and affirmatively further fair housing. Many organizations throughout the city were solicited to participate. A total of 84 persons in the City of Oklahoma City have completed the survey, which was conducted entirely online. An identical version of the survey was also offered in Spanish, but has received no responses. A complete list of responses is included in Appendix B. Other survey results are also discussed in **Sections V and VI.**

Table VII.1
Role of Respondent
City of Oklahoma City
2014 Fair Housing Survey Data

Primary Role	Total
Other Role	31
Advocate/Service Provider	13
Local Government	12
Missing	10
Property Management	7
Construction/Development	4
Law/Legal Services	4
Service Provider	3
Total	**84**

Respondents of the 2014 Fair Housing Survey were asked to identify their primary role within the housing industry. As shown in Table VII.1 above, 31 respondents identified their role as "other role", 13 as advocates or service providers, 12 as local government officials, and 7 as property managers.

Table VII.2
How Familiar are you with Fair Housing Laws?
City of Oklahoma City
2014 Fair Housing Survey Data

Familiarity	Total
Not Familiar	27
Somewhat Familiar	24
Very Familiar	18
Missing	15
Total	**84**

The next question asked respondents about their familiarity with fair housing laws. Results of this question are presented in Table VII.2 at left. As shown, 27 respondents considered themselves to be unfamiliar with fair housing laws, while a total of 42 considered themselves to be either "somewhat" or "very" familiar with fair housing laws. Fifteen respondents failed to respond to this question.

Survey respondents were also asked to assess the usefulness and adequacy of fair housing laws; responses to this question are tallied in Table VII.3 on the following page. As shown, those who took the survey generally agreed that fair housing laws are useful, and only five responded that such laws are not useful. Respondents were more

divided on the question of whether or not fair housing laws are difficult to understand: 15 felt that these laws are difficult to understand, 30 felt they were not, and 22 responded "don't know". Nine respondents felt that fair housing laws should be changed; several of these maintained that fair housing protections should be expanded to include such categories as sexual orientation. Respondents were more evenly divided on the question of whether or not fair housing laws were adequately enforced; 27 respondents thought they were, 29 thought they were not, and 9 responded that they did not know.

Table VII.3
Federal, State, and Local Fair Housing Laws
City of Oklahoma City
2014 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Do you think fair housing laws are useful?	51	5	11	17	84
Are fair housing laws difficult to understand or follow?	15	30	22	17	84
Do you think that fair housing laws should be changed?	9	21	37	17	84
Do you thing fair housing laws are adequately enforced?	27	29	9	19	84

The next section in the survey related to fair housing activities, including outreach and education and testing and enforcement. As shown in Table VII.4 below, 27 respondents were aware of a training process to learn about fair housing laws, and 17 had participated in such a process. However, 29 respondents were unaware of any training process, and 9 responded with "don't know". Thirteen respondents were aware of fair housing testing in the city, thirty were unaware of testing in the area, and twenty-two responded with "don't know".

Questions in this section also invited respondents to gauge the current levels of fair housing activities in their communities. Twenty-four respondents feel that there was too little in the way of fair housing outreach and education; eight thought current levels were sufficient and only one felt that they were excessive. Asked whether fair housing testing efforts were sufficient, ten respondents felt that the current level of testing was insufficient; three felt that it was appropriate, and one felt that is was excessive.

Table VII.4
Fair Housing Activities
City of Oklahoma City
2014 Fair Housing Survey Data

Question		Yes	No	Don't Know	Missing	Total
Is there a training process available to learn about fair housing laws?		27	29	9	19	84
Have you participated in fair housing training?		17	13	6	48	84
Are you aware of any fair housing testing?		13	30	22	19	84
Testing and education	**Too Little**	**Right Amount**	**Too Much**	**Don't Know**	**Missing**	**Total**
Is there sufficient outreach and education activity?	24	8	1	32	19	84
Is there sufficient testing?	10	3	1	51	19	84

As part of the process of measuring understanding of fair housing law through the survey instrument, respondents were asked to list their awareness of classes of persons protected by fair housing laws on federal, city, and local levels. Race and disability were offered as examples of protected classes in the question narrative, and respondents were encouraged to continue on and list other protected classes. As shown in Table VII.5 at right, some respondents were able to correctly identify several of the protected classes, including gender, religion, family status, age[55], and national origin. Few respondents identified groups as "protected" that are not, in fact, protected by any of the laws applicable to Oklahoma City residents. Exceptions included the fifteen respondents who incorrectly identified sexual orientation as a protected class, along with the six respondents who identified income as a protected class.

Table VII.5
Protected Classes
City of Oklahoma City
2014 Fair Housing Survey Data

Protected Class	Total
Gender	32
Religion	26
Age	19
Family Status	19
Sexual Orientation	15
National Origin	14
Color	6
Income	6
Ethnicity	4
Race	4
Disability	1
Criminal History	1
AIDS	1
Other	11
Total	**159**

Table VII.6 below presents tallied responses to survey questions related to the status of fair housing in Oklahoma City. First, respondents were asked if they were aware of a fair housing plan in their communities. Only five respondents stated that they were aware of such policies, while 32 maintained that they were unaware of such policies and 21 did not know well enough to weigh in on the question. Respondents were also asked to offer information regarding any specific geographic areas with fair housing problems: seven respondents claimed to be aware of such areas, and several identified northeast Oklahoma as such an area in commentary.

Table VII.6
Local Fair Housing
City of Oklahoma City
2014 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any city or county fair housing ordinance, regulation, or plan?	5	32	21	26	84
Are there any specific geographic areas that have fair housing problems?	7	16	34	27	84

Fair Housing Forum

Fair Housing Forum

One fair housing forum was held in City of Oklahoma City as part of the AI process. This forum was held on October 9, 2014 at 4:00 PM in Oklahoma City. The purpose of the presentation and subsequent discussion was to provide the public with an opportunity to learn more about the AI process and why it was conducted, and to share preliminary findings from the study. Representatives from Metropolitan Fair Housing Council, Legal Aid, and the State Attorney General's Office of Civil Rights Enforcement were also in attendance, and had an opportunity to discuss the role that their agencies and organizations play in affirmatively furthering fair housing. The complete minutes from the meeting are presented in Appendix C.

[55] While fair housing protections based on age are limited at the federal level, it is included as a protected class in anti-discrimination laws at the state and local level.

The discussion at the forum was wide-ranging; nevertheless, there were several dominant themes: Forum participants noted a level of apathy surrounding fair housing policy, and a need to promote greater engagement on the part of the public. In addition, a representative from Legal Aid Services highlighted disability as the most common basis for complaints that his organization receives from members of the public. Finally, forum participants discussed the closure of the recent Human Rights Commission and the impact that closure has had on investigation and enforcement resources in the region.

SUMMARY

Public input during the AI process was sought through participation in the 2014 Fair Housing Survey, as well as a series of meetings held in Oklahoma City. The survey, which began in July 2014 and ended in January 2015, received 84 responses. The meetings, which included a fair housing forum, presentation to the city council, and a public input session where held in the city from October through December 2014.

Responses to the survey indicated that respondents are generally familiar with, and supportive of, fair housing laws, though opinion was somewhat more divided on how easy the laws are to understand, whether any changes to the laws are necessary, and whether current laws are adequately enforced. Less than half of all respondents were aware of any fair housing training process available in the city, and fewer still had taken advantage of such training or knew of any fair housing testing taking place in the city. Current levels of outreach, education, and testing were deemed to be insufficient by a substantial portion of respondents who answered those questions, and relatively few were aware of any fair housing plan at the city level.

The Fair Housing Forum that took place on October 9, 2014 in Oklahoma City allowed members of the public to learn more about fair housing and to discuss some of the challenges the city faces. Some of the more prominent themes of the discussion included a perceived apathy around the issue of fair housing, the prevalence of fair housing complaints on the basis of disability, and the impact of the recent closure of the state Human Rights Commission.

SECTION VIII. SUMMARY OF FINDINGS

This AI reviews both the public and private sector contexts for the City of Oklahoma City's housing markets, in order to determine the effects these forces have on housing choice. As part of that review, analysis of demographic, economic, and housing data provide background context for the environments in which housing choices are made. Demographic data indicate the sizes of racial and ethnic populations and other protected classes; economic and employment data show additional factors in influencing housing choice; and counts of housing by type, tenure, quality, and cost indicate the ability of the housing stock to meet the needs of the city's residents.

Once this contextual background analysis has been performed, detailed review of fair housing laws, cases, studies, complaints, and public involvement data can be better supported by the background information. The structure provided by local, state, and federal fair housing laws shapes the complaint and advocacy processes available in the city, as do the services provided by local, state, and federal agencies. Private sector factors in the homeownership and rental markets, such as home mortgage lending practices, have substantive influence on fair housing choice. In the public sector, policies and codes of local governments and a limited location of affordable rental units can significantly affect the housing available in each area, as well as neighborhood and community development trends. Complaint data and AI public involvement feedback further help define problems and possible impediments to housing choice for persons of protected classes, and confirm suspected findings from the contextual and supporting data.

Socio-Economic Context

Oklahoma City has grown steadily since 2000, from a population of 506,132 to an estimated 610,613 in 2013. Between 2000 and 2010, the city grew by an estimated 14.6 percent, with much of this growth driven by an increase in the number of residents aged less than five years, 25 to 34 years, and 55 to 64 years. These groups; which grew at a rate that was above average for the population as a whole, accounted for a larger share of city residents in 2010 than they had in 2000. All other age cohorts declined as a share of the total population, but on the whole the proportions of residents in each age group remained similar in 2010 to what they had been in 2000.

A more marked shift was observed in the city's racial and ethnic composition. White residents, who represented 68.4 percent of the population in 2000, came to account for 62.7 percent of the population in 2010. This decline of nearly six percentage points is explained largely by growth in the number of residents who identified themselves as "other" or belonging to two or more racial groups; the shares of black residents changed very little between the two Censuses, as growth in that population was only slightly less than the average rate of growth. The Hispanic population, by contrast, grew considerably between 2000 and 2010, nearly doubling in number. Having represented 10.1 percent of the population in 2000, Hispanic residents came to account for 17.2 percent of the population in 2010.

Changes in the racial and ethnic composition of the city described above were reflected in changes to the geographic distribution of the black and Hispanic populations. The black population changed little as a share of the city's overall population, and black residents

remained disproportionately concentrated in Census tracts to the east and northeast of the city center. As the Hispanic population grew in absolute numbers and as a share of the population, the number of Census tracts with high concentrations of Hispanic residents grew. However, tracts that came to have a disproportionate share of Hispanic residents after 2000 tended to be located next to tracts that had relatively high shares of Hispanic residents in 2000; these were clustered to the southwest and west of the downtown area.

Residents with disabilities accounted for 21.5 percent of the population in 2000, and were highly concentrated in Census tracts near the interchange of Interstate 40 and Interstate 235 in the city center. In 2008-2012, an estimated 13.3 percent of the population was living with some form of disability[56], and these residents remained concentrated in central Census tracts, including tracts to the east and south of the city center.

Though growth in the overall population was steady between 2000 and 2013, growth in the labor force and the number of employed has been subject to some fluctuation, according to data from the Bureau of Labor Statistics (BLS). The labor force and number of employed both declined from 2005 through 2007; the number of employed persons increased slightly in 2008, but fell dramatically in 2009. By contrast, the labor force has grown steadily since 2008, and these two trends together contributed to a spike in the unemployment rate that continued through 2010. In that year, 6.3 percent of the city's workers were out of a job. However, monthly unemployment data shows that the subsequent decline in the unemployment rate began in March of 2010, and continued through 2012. The unemployment rate ticked up slightly in 2012, and stood at 5.1 percent in that year.

After 2000, the number of full- and part-time jobs in the city declined by 14,000 through 2003 before entering a period of growth that lasted until 2008. After 2008, the number of jobs in the city fell by over 10,000. Growth in total employment resumed the following year. Real average earnings and real per capita income have both grown since 1995, though both showed substantial yearly fluctuation between 2006 and 2010. Since 2010, growth in earnings and incomes has been steady. Changes in real earnings and income are reflected by changes in household incomes between 2000 and 2012, during which time the share of households making less than $50,000 in current dollars fell while the share of households making $50,000 and over grew.

In spite of the fact that incomes in the city grew by several measures, the poverty rate also increased from 16 percent in 2000 to 17.6 percent in 2012. There were only a few Census tracts with disproportionate shares of poverty scattered throughout the city center. Tracts with above-average poverty rates were more common and widely distributed in the city center. By 2012, the number of tracts with above-average shares of poverty had grown considerably, and disproportionate shares of poverty were observed in Census tracts throughout the city center.

The composition of the city's housing stock changed very little between the two decennial Census counts: 89.6 percent of housing units were occupied in both years. Among occupied units, nearly 60 percent were owner-occupied in both years. Owner-occupied units were

[56] Note: The Census Bureau substantially changed the part of the ACS questionnaire pertaining to disabilities in 2008. For this reason, direct comparisons between 2000 Census counts and post-2008 ACS estimates are discouraged. Thus, it would not be correct to conclude, based on these data, that the share of residents with disabilities fell from 21.5 percent to 13.3 percent, since different measures were employed in each dataset.

concentrated in peripheral Census tracts and were largely absent from the city center. By contrast, rental units tended to be concentrated in the city center, particularly in the downtown area and areas to the northeast and southwest of the downtown area. Vacant units, which accounted for 10.4 percent of the overall housing stock in 2000 and 2010, were concentrated in central tracts near the Interstate 235-Interstate 40 interchange. Units classified as "other vacant" were concentrated in Census tracts to the northeast and southwest of the downtown area.

The Census Bureau publishes data on additional housing problems, including overcrowding, incomplete plumbing and kitchen facilities, and cost-burdening. The share of housing units that were overcrowded; or those that had more than one resident per room; fell from 5 percent to less than 3 percent between 2000 and 2012. The share of housing units with incomplete plumbing facilities also fell, from 0.5 to 0.3 percent of all housing units. The number of units with incomplete kitchen facilities increased, but still only accounted for one percent of housing units in 2012. A more pervasive problem was cost-burdening: the share of city households that were paying more than 30 percent of their incomes toward housing costs grew from 25.5 to 32.6 percent—this problem fell more heavily on renters than on homeowners, as did the problem of overcrowding to a lesser degree.

Housing costs also increased between Census counts. Median contract rent, which includes the cost of rent and excludes additional charges, rose from $481 to $551. Similarly, median home values rose from $80,300 to $131,000 during the same time period. Census tracts with relatively high housing costs tended to be located in peripheral Census tracts. However, there were central Census tracts with relatively high housing costs, including the tract surrounding the interchange of Interstate 235 and Interstate 40.

Review of Fair Housing Laws, Studies, and Cases

Residents of Oklahoma City are protected from discrimination in the housing market by laws at the federal, state, and local level. Laws at the federal and state level include protections based on race, color, religion, sex, national origin, familial status, and disability; and state law extends additional protection based on age. Oklahoma City ordinances add ancestry and creed to federal protected class designations, but do not include protections based on familial status and disability. The discussion of national fair housing studies and cases highlights the forms in which discrimination may present itself in the housing market as well an increased scrutiny on the part of HUD in recent years of fair housing policies and practices. In spite of this increased scrutiny, the Department of Justice has not filed any fair housing cases against Oklahoma residents in the last decade.

Fair Housing Structure

Oklahoma City residents who feel that they have experienced unlawful discrimination in the housing market may file a complaint with HUD, the Oklahoma Attorney General's Office, the Oklahoma City Municipal Counselor, and the Metropolitan Fair Housing Council (MFHC). The latter, a local non-profit organization and Fair Housing Initiative Partnership (FHIP) grantee[57], contracts with the city to conduct fair housing activities, including investigation of fair housing

[57] FHIP grantees receive funding from HUD to carry fair housing activities at local and state levels (**See Section IV**).

complaints. Note that because federal, state, and local anti-discrimination laws recognize different protected classes in some cases, the agency to which a resident may bring his or her complaint will depend on the nature of the complaint. For example, those who file a complaint based on age discrimination with the Metropolitan Fair Housing Council will likely have their complaint referred, if meritorious, to the Oklahoma Attorney General rather than to HUD, since age discrimination in the private housing market would not represent a violation of the Fair Housing Act unless the housing project in question were a recipient of federal funding.

Fair Housing in the Private Sector

Oklahoma City residents or prospective residents applied for 192,326 home purchases loans from 2004 through 2013. A majority of these, or 171,926, were intended to finance homes in which the owners planned to live themselves. Applications submitted in the City led to 85,618 loan originations and 16,806 denials, for an average denial rate of 16.4 percent. Applications were denied more frequently when the home in question was located close to the city center, or when it was located in areas to the northeast and southwest of the city center. Loan denials were also denied more frequently to female than to male applicants, to black applicants than to white applicants, and to Hispanic applicants than to non-Hispanic applicants. However, many of the areas in which black applicants were most frequently turned down for loans lay outside of areas with relatively high concentrations of black residents. More than a third of loan applications from Hispanic residents were denied in areas throughout the city center.

Credit history and debt-to-income ratio were the most common identified factors in loan denials in the city. Though credit history has consistently been a primary factor in loan denials, the importance of debt-to-income ratio has grown since 2004, when less than ten percent of loans were denied primarily due to debt-to-income ratio. By 2011, nearly a fifth of loans were denied primarily for that reason. Unsurprisingly, income was related to loan denial rates: the higher the applicant's income, the less likely he or she would be denied. However, racial and ethnic discrepancies in loan denial rates persisted even when applicants of different races were similarly situated with respect to income. Although income was equal in those cases, there were likely other factors that made some applications stronger than others. However, it should be of concern that those denial rates break along racial and ethnic minority lines.

In some cases, applicants who were able to secure a loan were issued loans with high annual percentage rates (HALs). Over 11 percent of all loans issued in the city from 2004 through 2013 were HALs, which are considered predatory in nature. Like loan denials, HALs were issued disproportionately to black and Hispanic borrowers, and were most common in the parts of the city in which those residents were disproportionately concentrated. However, black borrowers themselves were issued HALs with relative frequency throughout the city center, as were Hispanic applicants. In the case of black residents, HALs tended to appear more frequently outside of areas in which black residents were disproportionately concentrated in 2000 and 2010.

Geographic areas relatively low median incomes also tended to receive relatively little in the way of small business lending, according to data gathered under the Community Recovery Act. The 199,936 small business loans originated in the city between 2000 and 2013 tended to go to Census tracts with higher median family incomes, including downtown Census tracts and large tracts near the interchange of Interstate 235 and Interstate 44; the latter of which

encompassed the Chesapeake Energy Corporation's Oklahoma City campus. As one might expect, the $8,475,173 in loan dollars issued in the city followed a similar geographic distribution.

The status of fair housing in the city was further evaluated through a review of housing discrimination complaints filed with HUD and the Metropolitan Fair Housing Council (MFHC). Disability was the most common perceived basis for discrimination in both datasets, cited in 141 HUD complaints and 347 complaints filed with the MFHC.[58] The next most commonly perceived basis for discrimination among HUD complaints was race, followed by family status. In complaints lodged with MFHC, familial status was the second most common complaint basis. Discrimination in the rental housing market was relatively common among HUD complaints.

Awareness of barriers to fair housing choice in the private sector was limited among respondents to the Fair Housing Survey: at most, one respondent in twelve reported being aware of barriers to fair housing choice in any of the industries or services mentioned. Those who did perceive discrimination in the private housing market cited several issues in comments submitted with the survey, including discrimination in the housing market on the basis of race and disability. In addition, those who responded to these questions with "don't know" represented a large share of responses to each question, suggesting that awareness or understanding of issues relating to fair housing is limited in the city.

Results of a survey of Oklahoma City attorneys suggest that complaints from Oklahoma City residents who believe that they have been subjected to illegal discrimination during their housing search tend to involve the rental housing market more often than any other market, and often pertain to discrimination on the basis of disability. These attorneys also highlighted the need for additional education among housing providers and residential tenants.

Fair Housing in the Public Sector

The assessment of affirmatively furthering fair housing in Oklahoma City's public sector included analysis of public assisted housing units, transportation networks, and data gathered through the 2014 Oklahoma City Fair Housing Survey. Data from these sources underscores some of the challenges to affirmatively furthering fair housing present in public policy in the city. Specific examples of such challenges include the placement of public assisted housing units in the city and NIMBYism[59].

Public assistance is provided in the housing market through HOME Assisted Rental Housing, Section 8 Housing Vouchers, Public Housing, and Down Payment Assistance. The first three programs offer subsidized rent to Oklahoma City residents, and are subject to income restrictions, which vary according to the program. Down Payment Assistance is available to homebuyers who purchase homes in certain areas of the city, and who participate in homebuyer education classes. Analysis of the geographic distribution of these units within the city reveals that they tend to be concentrated in areas of the city with relatively high rates of poverty and large shares of minority residents.

[58] Note that some of the complaints received by MFHC are referred to HUD, so some of the same complaints may appear in both datasets.
[59] A "Not in my backyard" mentality

Results from the Public Sector portion of the 2014 Oklahoma City Fair Housing Survey reveal that perception of barriers to fair housing choice was limited in most of the public policy arenas mentioned. However, several survey participants perceived the effect of NIMBYism in land use and zoning policies, often pertaining to the placement of group housing and apartment complexes. Transportation was also a concern among survey respondents, who felt that the current transit network was not sufficient to meet the needs of the city's residents, particularly those without their own means of transportation.

Public Involvement

Public input during the AI process was sought through participation in the 2014 Fair Housing Survey, as well as a series of meetings held in Oklahoma City. The survey, which began in July 2014 and ended in January 2015, received 84 responses. The meetings, which included a fair housing forum, presentation to the city council, and a public input session where held in the city from October through December 2014.

Responses to the survey indicated that respondents are generally familiar with, and supportive of, fair housing laws, though opinion was somewhat more divided on how easy the laws are to understand, whether any changes to the laws are necessary, and whether current laws are adequately enforced. Less than half of all respondents were aware of any fair housing training process available in the city, and fewer still had taken advantage of such training or knew of any fair housing testing taking place in the city. Current levels of outreach, education, and testing were deemed to be insufficient by a substantial portion of respondents who answered those questions, and relatively few were aware of any fair housing plan at the city level.

The Fair Housing Forum that took place on October 9, 2014 in Oklahoma City allowed members of the public to learn more about fair housing and to discuss some of the challenges the city faces. Some of the more prominent themes of the discussion included a perceived apathy around the issue of fair housing, the prevalence of fair housing complaints on the basis of disability, and the impact of the recent closure of the state Human Rights Commission.

SECTION IX. IMPEDIMENTS AND SUGGESTED ACTIONS

Private Sector Impediments, Suggested Actions, and Measurable Objectives

***Impediment 1*: More frequent denial of home purchase loans to black, Hispanic, and female applicants.** This impediment was identified through review of home purchase loan data collected under the Home Mortgage Disclosure Act (HMDA). It should be noted that many of the factors that bear on the decision to approve or deny a loan are not captured in HMDA data. Nevertheless, the data do allow for a determination of whether the outcome of a loan application is likely to differ based on the race, ethnicity, or gender of the applicant. As discussed in **Section V**, black, Hispanic, and female applicants were more likely to be denied loans than white, non-Hispanic, and male borrowers, respectively. In the case of black and Hispanic borrowers, such discrepant loan rates held even when applicants were similarly situated with respect to income. Furthermore, the geographic distribution of loan denial rates demonstrated that areas with high concentrations of black and Hispanic residents had higher rates of loan denials.

Action 1.1: Enhance outreach and education to first time homebuyers.
Measurable Objective 1.1: Number of homebuyer education training sessions offered and number of attendees
Action 1.2: Enhance understanding of the value of credit and the ability to keep and maintain good credit
Measureable Objective 1.2: Number of credit counseling sessions offered and number of participants in those sessions

***Impediment 2*: Predatory style lending falls more heavily on Black and Hispanic borrowers.** This impediment was also identified through review of data collected under HMDA. Black and Hispanic borrowers were more likely to receive loans with high annual percentage rates (HALs) than white and non-Hispanic borrowers, respectively. This trend was also reflected in the geographic distribution of these loans, which tended to be more heavily concentrated in areas with higher concentrations of black and Hispanic residents.

Action 2.1: Enhance outreach and education to first time homebuyers
Measurable Objective 2.1: Number of homebuyer education training sessions offered and number of attendees
Action 2.2: Improve understanding of the attributes of predatory lending, and discourage borrowers from utilizing predatory lending
Measureable Objective 2.2: Published information regarding predatory style lending on city website, including how to identify such loans, inclusion of this information in homebuyer education and credit counseling sessions, number of such sessions held and record of participation
Action 2.3: Reach out to local bankers and solicit their input on methods to make consumers better aware of the attributes of such loans
Measureable Objective 2.3: Record of outreach efforts, number of bankers contacted, compiled list of recommendations

***Impediment 3*: Discriminatory terms, conditions, privileges, or facilities relating to rental; refusal to rent.** This impediment was identified through review of fair housing complaints submitted to HUD and the Metropolitan Fair Housing Council by Oklahoma City residents.

Action 3.1: Enhance outreach and education to renters
Measurable Objective 3.1: Number of outreach and education training sessions conducted, number of participants
Action 3.2: Enhance outreach and education to housing providers so that they understand fair housing law and their duties under the law
Measureable Objective 3.2: Number of outreach and education training sessions conducted, number of participants

***Impediment 4*: Failure to make reasonable accommodation.** Failure to make reasonable accommodation was cited specifically in over ten percent of the complaints lodged with HUD from 2004 through 2014, and disability was the most common alleged basis of discrimination in complaints lodged with HUD and with the MFHC. In addition, commentary submitted with questions in the private sector portion of the fair housing survey identified residents with disabilities as subject to discrimination in the private housing market. Commentary in the public sector portion of the survey highlighted NIMBYism as a barrier present in the housing market, and maintained that neighborhood opposition to group homes served to bar residents of such housing from certain areas in the city. In addition, in a recent forum discussion held in the city of Oklahoma City, a representative of Legal Aid noted that the most common complaints lodged with the organization pertained to discrimination on the basis of disability. Many of these complaints involved a failure or refusal to make a reasonable accommodation for residents with disabilities.

Action 4.1: Conduct audit tests of new market rate construction, and publish the results of such testing
Measurable Objective 4.1: Number of audit tests conducted, record of publication of results of testing
Action 4.2: Conduct outreach and education for providers of multifamily housing
Measureable Objective 4.2: Number of outreach and education training sessions conducted, number of participants
Action 4.3: Encourage developers and builders of housing to attend fair housing training sessions that include reasonable accommodation and modification
Measureable Objective 4.3: Identified incentives for attendance and record of outreach to developers and builders concerning fair housing training sessions

***Impediment 5*: Lack of understanding of fair housing laws.** National fair housing studies presented in **Section III** have consistently revealed that members of the public are often misinformed or uninformed about fair housing laws. A substantial minority of survey respondents professed to be unfamiliar with fair housing laws and programs, and a considerable number of "don't know" responses to survey questions designed to gauge public awareness of fair housing laws suggests that survey respondents do not have a strong grasp of the substance of the laws. Furthermore, more than a sixth of survey respondents incorrectly identified "sexual orientation" as a protected class in Oklahoma City.

Action 5.1: Engage parties for co-sponsoring events in April during Fair Housing Month

Measurable Objective 5.1: Number of parties contacted, number of parties that commit to co-sponsorship of events

Action 5.2: Conduct educational training sessions for consumers, providers of housing, and program management staff

Measureable Objective 5.2: Number of education training sessions conducted, number of participants

Action 5.3: Add selection criteria to assisted housing location proposals that give credit to developers and others who have attended fair housing trainings, including those trainings designed to enhance reasonable accommodation or modification

Measureable Objective 5.3: Determination of credit to be given for attendance at fair housing training sessions, inclusion of criteria in assisted housing location proposals

Public Sector Impediments, Suggested Actions, and Measurable Objectives

***Impediment 1*: Insufficient understanding or fair housing laws.** This impediment was included in the list of private sector impediments as Impediment 5, and the rationale behind its inclusion as a public sector impediment is the same as discussed above. Lack of knowledge of fair housing laws is not exclusively the product of private or public sector forces, and engagement of both sectors is necessary to promote wider awareness and understanding of those laws and policies.

Action 1.1: Engage parties for co-sponsoring events in April during Fair Housing Month

Measurable Objective 1.1: Number of parties contacted, number of parties that commit to co-sponsorship of events

Action 1.2: Conduct educational training sessions for consumers, providers of housing, and program management staff

Measureable Objective 1.2: Number of education training sessions conducted, number of participants

Action 1.3: Promote and distribute fair housing flyers

Measureable Objective 1.3: Number of fair housing flyers produced and distributed, display of fair housing flyer on city website during fair housing month

***Impediment 2*: Concentration of subsidized and assisted housing in areas with high concentrations of minority residents and households in poverty.** This impediment was identified through review of the geographic distribution of Section 8 Vouchers, HOME Assisted Rental Housing, Public Housing, and units purchased through Down Payment Assistance. The number of assisted units in an area was observed to be positively correlated with the poverty rate of an area, as well as the concentration of racial and ethnic minority residents. Such areas are better served by public transit than areas with lower poverty rates, and have often been targeted for investment of public funds as part of revitalization efforts. However, because residents of assisted housing tend to be people of color, policies that concentrate such units in areas with high concentrations of minority residents may inadvertently serve to further concentrate minority residents in certain areas of the city. Therefore, care is needed to develop policies that discourage concentration of minority residents while continuing to serve the goals of revitalization of low-income areas.

Action 2.1: Add selection criteria to assisted housing location proposals that give credit to considering the racial, ethnic, and income characteristics of the neighborhood in which the housing facility is to be placed

Measurable Objective 2.1: Identification of criteria and inclusion of these criteria in assisted housing location proposals

Action 2.2: Evaluate the past set of selection criteria and determine what went wrong with the prospective housing locations, thereby explaining the concentrations that have occurred

Measureable Objective 2.2: Identification of factors in past selection criteria

Action 2.3: Review planning and zoning ordinances to allow for the greater geographic distribution of such multi-family units or affordable housing units

Measureable Objective 2.3: Identification of the number and locations of zoning districts that restrict the placement of multi-family units

***Impediment 3*: NIMBYism used to block multifamily development.** This impediment was identified through review of responses to the 2014 Fair Housing Survey. When asked to comment on specific barriers to fair housing choice in land use policies and zoning laws, survey respondents cited NIMBYism as such a barrier, and several respondents maintained that group homes and apartment complexes were especially likely to be targets of neighborhood opposition.

Action 3.1: Consider methods to overcome NIMBYism

Measurable Objective 3.1: Record of discussions, meetings, and correspondence pertaining to NIMBYism, compiled list of actions the city might take to reduce the influence of NIMByism

Action 3.2: Enhance understanding for affordable housing in alternative locations through outreach and education

Measureable Objective 3.2: Number of outreach and education sessions conducted and record of participation in these training sessions

Action 3.3: Prepare case studies that highlight the benefits of affordable housing development intermixed with other land uses

Measureable Objective 3.3: Preparation of case studies, record of efforts to publish and disseminate reports to local housing market stakeholders

***Impediment 4*: Zoning presents a barrier in some areas.** As noted above, some survey respondents considered zoning and land use decisions to be a conduit for neighborhood opposition to the placement of group housing and multi-family development. Other respondents maintained that zoning policies had the effect of limiting fair housing choice in and of themselves, in that they limit certain areas to uses that preclude multifamily development.

Action 4.1: Convene a work group to address which zoning codes represent barriers in some areas, determine which zoning codes those represent, and where, and assess policies or practices to eliminate or modify the codes so that such impacts are lessened or eliminated

Measurable Objective 4.1: Identification of those zoning codes, as well as the extent and location of zoning districts that restrict the location of multi-family housing

***Impediment 5*: Lack of adequate public transit in the city.** This impediment was identified through input of stakeholders who participated in the 2014 Fair Housing Survey. More survey respondents identified barriers to fair housing choice in access to government services than any other public sector area, and most of those who indicated that they were aware of barriers in this area identified limited public transportation as a challenge to fair housing choice.

Action 5.1: Determine which transit routes need to be modified or created

Measurable Objective 5.1: Identification of transit routes and areas that are currently underserved by public transit available in the city

Action 5.2: Solicit input from the affected public on ways to improve the overall transit system

Measureable Objective 5.2: Record of attempts made to solicit public input, number of recommendations received, list of recommendations compiled

Action 5.3: Solicit input from the transit agency to better understand the institutional reasoning of why some of the suggested options may not be feasible, yet

Measureable Objective 5.3: Record of outreach to transit agency, number of attempts to secure input, record of dialogue and identification of institutional barriers to the expansion of public transit into currently underserved areas

***Impediment 6:* Insufficient fair housing protections in city anti-discrimination law.** This impediment was identified through review of the fair housing laws in effect in the city of Oklahoma City. The Oklahoma City statute concerning discrimination in housing (§ 25-39) was last updated in 1980, before familial status and disability were recognized as protected classes by the federal Fair Housing Act. The statute does not provide for protections from discrimination in the housing market based on disability or familial status. As well, it has not kept pace with State Law, since State Law has protections for age.

Action 6.1: Recommend that the City Council pass legislation recognizing disability, familial status, and age as protected classes under Oklahoma City law

Measurable Objective 6.1: Record of correspondence with the city council concerning the need to include disability, familial status, and age as protected classes

SECTION X. GLOSSARY

Accessible housing: Housing designed to allow easier access for physically disabled or vision impaired persons.

ACS: American Community Survey

AI: Analysis of Impediments to Fair Housing Choice

AMI: Area median income

BEA: Bureau of Economic Analysis

BLS: Bureau of Labor Statistics

CDBG: Community Development Block Grant

Census tract: Census tract boundaries are updated with each decennial census. They are drawn based on population size and ideally represent approximately the same number of persons for each tract.

Consolidated Plan: Consolidated Plan for Housing and Community Development

Cost burden: Occurs when a household has gross housing costs that range from 30.1 to 50 percent of gross household income. A **severe cost burden** occurs when gross housing costs represent 50.1 percent or more of gross household income.

CRA: Community Reinvestment Act

Disability: A lasting physical, mental, or emotional condition that makes it difficult for a person to conduct daily activities of living or impedes him or her from being able to go outside the home alone or to work.

Disproportionate share: Exists when the percentage of a population is 10 percentage points or more above the study area average.

DOJ: U.S. Department of Justice

ESG: Emergency Shelter Grants program

Fannie Mae: Federal National Mortgage Association (FNMA), a government-sponsored enterprise that purchases mortgages from lenders and repackages them as mortgage-backed securities for investors.

Family: A family is a group of two people or more related by birth, marriage, or adoption and residing together.

FFIEC: Federal Financial Institutions Examination Council

FHAP: Fair Housing Assistance Program

FHEO: Fair Housing and Equal Opportunity

FHIP: Fair Housing Initiative Program

Floor area ratio: The ratio of the total floor area of a building to the land on which it is situated, or the limit imposed on such a ratio.

Freddie Mac: Federal Home Loan Mortgage Corporation (FHLMC), a government-sponsored enterprise that purchases mortgages from lenders and repackage them as mortgage-backed securities for investors.

GAO: U.S. General Accounting Office

Gross housing costs: For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, this figure represents monthly rent and electricity or natural gas energy charges.

HAL: High annual percentage rate (APR) loan, defined as more than three percentage points higher than comparable treasury rates for home purchase loans, or five percentage points higher for refinance loans.[60]

HMDA: Home Mortgage Disclosure Act

HOEPA: Home Ownership and Equity Protection Act, addressed deceptive and unfair lending practices in home lending

HOME: HOME Investment Partnerships

HOPWA: Housing Opportunities for Persons with AIDS

Household: A household consists of all the people who occupy a housing unit. A house, an apartment or other group of rooms, or a single room, is regarded as a housing unit when it is occupied or intended for occupancy as separate living quarters; that is, when the occupants do not live with any other persons in the structure and there is direct access from the outside or through a common hall.

Housing problems: Overcrowding, incomplete plumbing or kitchen facilities, or cost burdens

HUD: U.S. Department of Housing and Urban Development

Incomplete kitchen facilities: A housing unit is classified as lacking complete kitchen facilities when any of the following are not present: a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator.

Incomplete plumbing facilities: A housing unit is classified as lacking complete plumbing facilities when any of the following are not present: piped hot and cold water, a flush toilet, and a bathtub or shower.

Labor force: The total number of persons working or looking for work

MFI: Median family income

Mixed-use development: The use of a building, set of buildings, or neighborhood for more than one purpose.

MSA: Metropolitan Statistical Area

NIMBYism: "Not in my backyard" mentality among community members, often in protest of affordable or multi-family housing.

Other vacant units: Housing units that are not for sale or rent

Overcrowding: Overcrowding occurs when a housing unit has more than one to 1.5 persons per room. **Severe overcrowding** occurs when a housing unit has more than 1.5 persons per room.

Poverty: The Census Bureau uses a set of money income thresholds that vary by family size and composition to determine who is in poverty. If a family's total income is less than the family's threshold, then that family and every individual in it is considered in poverty. The official poverty thresholds do not vary geographically, but they are updated for inflation using Consumer Price Index (CPI-U). The official poverty definition uses money income before taxes and does not include capital gains or noncash benefits (such as public housing, Medicaid, and food stamps).

Predatory loans: As defined by the Predatory Lending Consumer Protection Act of 2002 as well as the Home Owner Equity Protection Act (HOEPA), loans are considered predatory based on:

1. If they are HOEPA loans;[61]
2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and

[60] 12 CFR Part 203, http://www.ffiec.gov/hmda/pdf/regc_020702.pdf

[61] Loans are subject to the HOEPA if they impose rates or fees above a certain threshold set by the Federal Reserve Board. "HMDA Glossary." http://www.ffiec.gov/hmda/glossary.htm#H

3. Presence of HALs. For full definition, see **HAL.**

Protected Class: Group of people protected from discrimination and harassment. City of Oklahoma City residents are protected from housing discrimination based on race, sex, religion, familial status, disability, national origin, color, creed, age, and ancestry.

Public housing: Public housing was established to provide decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities.

RDA: Redevelopment agency

Severe cost burden: (See **Cost Burden**).

Severe overcrowding: (See **Overcrowding**)

Steering: Actions of real estate agents or landlords to discourage a prospective buyer or tenant from seeing or selecting properties in certain areas due to their racial or ethnic composition.

Tenure: The status by which a housing unit is held. A housing unit is "owned" if the owner or co-owner lives in the unit, even if it is mortgaged or not fully paid for. A cooperative or condominium unit is "owned" only if the owner or co-owner lives in it. All other occupied units are classified as "rented," including units rented for cash rent and those occupied without payment of cash rent.

APPENDICES

The following sections present additional data prepared in development of the City of Oklahoma City Analysis of Impediments to Fair Housing Choice.

A. COMMUNITY REINVESTMENT ACT DATA

Table A.1
Small Business Loans Originated: $100,000 or Less by Tract MFI
City of Oklahoma City
2000–2013 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
			Number of Loans			
2000	623	2,203	3,106	2,945	241	9,118
2001	823	2,726	4,203	3,572	380	11,704
2002	935	2,939	4,689	4,305	343	13,211
2003	1,042	3,965	4,153	4,763	464	14,387
2004	993	3,861	4,064	5,275	473	14,666
2005	915	3,868	4,070	5,703	378	14,934
2006	1,361	5,163	5,912	8,839	570	21,845
2007	1,328	5,667	6,113	9,793	625	23,526
2008	1,040	4,380	4,872	7,714	520	18,526
2009	507	1,624	1,887	3,139	205	7,362
2010	414	1,547	1,777	3,043	225	7,006
2011	539	1,882	2,107	3,653	289	8,470
2012	907	1,899	2,534	3,424	195	8,959
2013	841	1,984	2,428	3,330	185	8,768
Total	**12,268**	**43,708**	**51,915**	**69,498**	**5,093**	**182,482**
			Loan Amount ($1,000s)			
2000	9,250	33,741	46,384	42,159	5,182	136,716
2001	10,256	32,143	51,507	45,798	6,097	145,801
2002	12,700	33,275	57,640	50,514	6,753	160,882
2003	13,734	45,283	48,105	56,150	7,391	170,663
2004	15,059	47,328	48,888	62,622	6,784	180,681
2005	13,049	45,640	47,461	65,086	7,244	178,480
2006	15,630	51,838	59,570	89,230	6,756	223,024
2007	14,745	57,696	63,757	97,972	8,291	242,461
2008	14,656	47,023	53,968	80,499	7,320	203,466
2009	9,306	22,836	27,465	38,785	3,084	101,476
2010	7,781	24,041	27,290	38,704	4,178	101,994
2011	8,060	25,986	27,708	44,348	6,425	112,527
2012	14,123	24,957	32,557	44,167	2,865	118,669
2013	14,577	30,335	36,426	51,303	2,791	135,432
Total	**172,926**	**522,122**	**628,726**	**807,337**	**81,161**	**2,212,272**

Table A.2
Small Business Loans Originated: $100,001 to $250,000 by Tract MFI
City of Oklahoma City
2000–2013 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
			Number of Loans			
2000	56	135	156	155	24	526
2001	59	154	227	171	32	643
2002	59	159	221	183	42	664
2003	68	194	211	240	42	755
2004	80	205	225	218	45	773
2005	76	173	191	177	34	651
2006	70	178	180	175	24	627
2007	52	147	159	175	34	567
2008	58	148	193	191	32	622
2009	32	129	153	197	14	525
2010	54	124	123	160	16	477
2011	47	115	113	190	27	492
2012	73	127	112	189	25	526
2013	84	135	166	217	21	623
Total	**868**	**2,123**	**2,430**	**2,638**	**412**	**8,471**
			Loan Amount ($1,000s)			
2000	10,000	23,744	27,009	27,392	4,431	92,576
2001	9,972	27,466	38,429	29,162	5,456	110,485
2002	9,920	27,330	37,393	32,050	7,142	113,835
2003	12,258	34,650	37,676	39,293	7,180	131,057
2004	13,981	36,986	39,791	36,947	7,762	135,467
2005	13,588	31,031	34,365	30,846	6,275	116,105
2006	12,442	31,516	31,708	32,095	4,431	112,192
2007	9,099	26,527	29,257	31,391	6,549	102,823
2008	10,503	25,881	33,401	32,866	5,821	108,472
2009	5,767	23,242	26,855	32,705	2,758	91,327
2010	10,050	22,073	22,554	27,915	3,240	85,832
2011	9,082	20,057	19,606	33,670	4,712	87,127
2012	12,597	22,701	19,539	33,171	4,702	92,710
2013	14,433	24,053	27,888	39,313	3,763	109,450
Total	**153,692**	**377,257**	**425,471**	**458,816**	**74,222**	**1,489,458**

Table A.3
Small Business Loans Originated: More than $250,000 by Tract MFI
City of Oklahoma City
2000–2013 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
			Number of Loans			
2000	30	116	163	127	19	455
2001	62	158	208	178	46	652
2002	66	149	231	215	39	700
2003	62	206	217	198	56	739
2004	64	190	247	220	53	774
2005	62	168	228	190	49	697
2006	69	170	173	208	63	683
2007	57	164	194	209	51	675
2008	73	160	193	205	49	680
2009	53	128	162	146	35	524
2010	63	120	134	160	38	515
2011	64	153	134	161	38	550
2012	96	146	158	208	15	623
2013	103	161	201	232	19	716
Total	**924**	**2,189**	**2,643**	**2,657**	**570**	**8,983**
			Loan Amount ($1,000s)			
2000	15,507	58,050	88,339	65,954	9,780	237,630
2001	35,552	77,508	104,405	99,099	26,652	343,216
2002	36,341	77,397	117,284	113,313	21,683	366,018
2003	29,889	107,252	110,234	98,108	28,908	374,391
2004	31,104	97,773	132,184	113,574	28,270	402,905
2005	33,336	84,424	118,312	98,155	27,058	361,285
2006	38,633	84,727	95,620	107,340	36,197	362,517
2007	33,115	83,710	112,108	103,384	30,369	362,686
2008	39,620	83,266	108,842	108,931	28,935	369,594
2009	29,254	67,213	91,100	75,400	22,741	285,708
2010	34,082	59,626	78,164	89,013	24,884	285,769
2011	34,927	80,703	75,948	87,939	20,721	300,238
2012	51,331	81,540	86,940	109,782	7,536	337,129
2013	56,215	87,200	107,317	124,064	9,551	384,347
Total	**498,906**	**1,130,389**	**1,426,797**	**1,394,056**	**323,285**	**4,773,433**

Table A.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than $1 Million by Tract MFI

City of Oklahoma City
2000–2013 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
			Number of Loans			
2000	264	953	1,394	1,434	140	4,185
2001	432	1,298	2,003	1,864	265	5,862
2002	366	926	1,588	1,560	166	4,606
2003	448	1,558	1,783	2,082	219	6,090
2004	403	1,469	1,664	2,199	199	5,934
2005	446	1,705	1,980	2,760	216	7,107
2006	487	1,807	2,225	3,407	212	8,138
2007	449	1,914	2,245	3,615	217	8,440
2008	321	1,230	1,509	2,420	143	5,623
2009	152	524	634	1,056	58	2,424
2010	134	525	633	1,077	73	2,442
2011	244	759	943	1,658	143	3,747
2012	376	834	1,113	1,738	86	4,147
2013	329	867	1,215	1,788	80	4,279
Total	**4,851**	**16,369**	**20,929**	**28,658**	**2,217**	**73,024**
			Loan Amount ($1,000s)			
2000	15,064	51,184	78,770	76,603	10,935	232,556
2001	24,648	50,941	86,761	96,551	17,679	276,580
2002	23,375	55,641	97,761	110,825	11,209	298,811
2003	23,110	82,526	98,542	114,283	15,278	333,739
2004	25,326	84,066	108,961	121,938	17,502	357,793
2005	26,731	67,002	95,219	101,791	15,035	305,778
2006	28,799	71,495	87,043	125,931	17,948	331,216
2007	21,364	69,855	86,637	119,738	15,184	312,778
2008	25,347	61,436	83,352	103,365	15,688	289,188
2009	14,398	38,976	58,472	68,531	7,630	188,007
2010	9,647	30,922	45,212	71,206	9,614	166,601
2011	11,030	46,401	49,063	77,743	12,085	196,322
2012	20,153	40,789	56,044	84,103	4,914	206,003
2013	18,471	47,963	65,577	95,864	6,034	233,909
Total	**287,463**	**799,197**	**1,097,414**	**1,368,472**	**176,735**	**3,729,281**

B. Fair Housing Survey Open Questions

Federal, State, and Local Laws

Table B.1
Where would you refer someone if they felt that their fair housing rights had been violated?
City of Oklahoma City
2014 Fair Housing Survey Data

Comments:
ACLU
Department of Housing and Urban Development
Department of HUD
Do not know where.
don't know
Don't Know
dont know
Fair Housing Adm.
Fed Govt
File a complaint with HUD or a federal lawsuit
HUD
HUD website
I have no idea.
I would start with the City of OKC
In court
Law/ Legal Services
Legal Aid
Maybe
metro fair housing
Metro Fair Housing
Metro Fair Housing Council is the local provider of this service.
Metropolitan fair housing agency okc
Metropolitan Fair Housing Council of Greater Oklahoma City
No idea
Not sure
Not sure.
OAG and/or HUD
Office of Program Compliance and Disability Rights Office U.S. Department of Housing and Urban Development
OHFA HUD
OK County District Attorney
OKC Housing Authority
Oklahoma City Fair Housing
Oklahoma City Housing Authority
Oklahoma Fair Housing Authority
state level
The City of Oklahoma City
unsure
With metropolitan fair housing council.
With the State Attorney General's office, Metro Fair Housing, or in state or federal court.
Yes

Table B.2
How did you become aware of fair housing laws?
City of Oklahoma City
2014 Fair Housing Survey Data

Comments:
Attend annual fair housing workshops
Being on the Citizen's Committee for Community Development.
City of OKC Planning Department
During graduate school for a Master of Urban Planning
exposure through profession
Fair housing laws based on equality.
Fair Housing Seminar in Norman in 2012; internet research
Fair Housing training
Family has rental properties.
Going to city meetings.
have worked with federal programs for 7 years.
Home Buyer Education Workshop
HUD information through the workplace
I am an attorney who has received legal training and has experience in representing people in fair housing cases.
I operate federal housing programs
I work in mental health and I have to be knowledgeable about my clients rights to be able to advocate on their behalf
It's my job.
Legal counsel for a local governmental entity.
Looking it up on the computer about different things to know before buying a home.
Lots of reading and yearly fair housing training
Metropolitan fair housing agency, neighbor works training
My realtor
OHFA Section 8
Practicing attorney
Reading the information online and in grant materials
Reading the newspaper and other publications
Real Estate Sales
Realtor
Talking with Alejandra and other speakers.
Through training with CCA
Through work on the CCCD (Citizens Committee for Community Development
Through working on community development/
thru staffings at work
Training
Working close to the field
years of experience

Table B.3
How should fair housing laws be changed?
City of Oklahoma City
2014 Fair Housing Survey Data

Comments:
Add LGBT protections
Add sexual orientation, gender identity, source of income, age, marital status, limited English proficiency, homelessness, domestic violence as protected categories.
let the market do the work.
needs to include sexual preference as well.
Some fair housing laws are very open to interpretation and can on occasion be abused.
Some of these laws have outlived their usefulness. I don't know anyone who discriminates these days...it is all about who can pay the money.
The laws should be more stringent than they are presently are.
They should be more strictly enforced; landlords/property managers should be held to a much higher standard and a continuing duty to provide housing that is above "adequate"; there should be NO discrimination allowed against non-violent convicted felons.

Local Fair Housing

Table B.4
Are there any specific geographic areas that have fair housing problems?
City of Oklahoma City
2014 Fair Housing Survey Data

Comments:
always NE Okc
Medical Community neighborhood is inundated with Sober Living facilities, which are protected but they have over taken the neighborhood.
Most all areas of city doing a very poor job.
No area is exempt
Northeast Oklahoma City, Bricktown, "Uptown", "Midtown", Lake Hefner/NW Oklahoma City.
Poor population areas and slum lords taking advantage of desperate people needing housing.
SW and NW - race. Disability is a problem all over the city.

Table B.5
Please share any additional comments.
City of Oklahoma City
2014 Fair Housing Survey Data

Comments:
Glad you're doing the survey!
I see little overt discrimination these days. Housing is segregated by income level more than anything else, and this would be expected based upon the quality of the housing stock.
While I do not possess intimate knowledge with regards to fair housing I do believe it plays a vital role in the development of families and the overall economic development of a major metropolitan area such as Oklahoma City.

Fair Housing in the Private Sector

Table B.6
Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?
City of Oklahoma City
2014 Fair Housing Survey Data

Comments:
housing providers are denying housing based on the protected classes
Refusing to rent based on color, religion, and ethnicity; refusing to rent based on prior criminal history, even when the record is inaccurate.
slum lords and scams that target black neighborhoods

Table B.7
Are you aware of any questionable practices or barriers to fair housing choice in the real estate industry?
City of Oklahoma City
2014 Fair Housing Survey Data

Comments:
Only showing properties to people of certain races in very specific areas of the city.
Protected classes are treated differently and it is just more difficult

Table B.8
Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?
City of Oklahoma City
2014 Fair Housing Survey Data

Comments:
I think there's a higher standard - perhaps a bigger down payment and/or a higher interest rate
No English speakers are taken advantage of.
same as above
The entire system is crooked and meant to exploit the middle class and the poor.

Table B.9
Are you aware of any questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields?
City of Oklahoma City
2014 Fair Housing Survey Data

Comments:
There's usually maybe one unit that is handicap accessible - whatever the absolute minimum is. Violations are common.

Table B.10
Are you aware of any questionable practices or barriers to fair housing choice in the home insurance industry?
City of Oklahoma City
2014 Fair Housing Survey Data

Comments:
a Common way to place obstacles in front of protected classes. Stated in the example above There's always a credit check, which can be a barrier to those who struggle to build/maintain a good credit rating.

Table B.11
Are you aware of any questionable practices or barriers to fair housing choice in the home appraisal industry?
City of Oklahoma City
2014 Fair Housing Survey Data

Comments:
Property values based on racial demographics. It's an Oklahoma tradition. Racial makeup effects the value of property same as above The whole process is very subjective - the way they pick and choose which comparables to use.

Table B.12
Are you aware of any questionable practices or barriers to fair housing choice in any other housing services?
City of Oklahoma City
2014 Fair Housing Survey Data

Comments:
group homes/nursing homes/shelters- protected classes treated differently I am glad to see SNI putting out materials in Spanish. I have heard many stories of landlords finding ways to not rent to LGBT persons. It's human nature, common sense

Fair Housing in the Public Sector

Table B.13
Are you aware of any questionable practices or barriers to fair housing choice in land use policies?
City of Oklahoma City
2014 Fair Housing Survey Data

Comments:
NIMBY SOme neighborhoods will fight it when they hear an apt. complex is being built nearby. Zoning Zoning, especially with regard to urban infill.

Table B.14
Are you aware of any questionable practices or barriers to fair housing choice in zoning laws?
City of Oklahoma City
2014 Fair Housing Survey Data

Comments:
Euclidian zoning restricts mixing of housing
Group home placement
I believe that there SHOULD be a restriction of group homes in an area. If they are concentrated in a particular area, it can decrease the value of the homes in the neighborhood causing the area to become less desirable, effecting home sales. To me, it is unfair to concentrate group housing in such close proximity to each other. It is already bad enough when they are random strangers knocking on your door at 10 pm asking for food or money. You don't see that happening in the suburbs.
Location of group homes has been blocked because of NIMBY-type thinking
NIMBY
Several OKC neighborhoods have publicly fought against having a group home in their neighborhood
Zoning prevents concentration of certain uses, and encourages concentration of other uses.

Table B.15
Are you aware of any questionable practices or barriers to fair housing choice in occupancy standards or health and safety codes?
City of Oklahoma City
2014 Fair Housing Survey Data

Comments:
Code enforcement is a problem in general (except against homeless people who are squatting because they have no place to go)
Homes owned by Hispanics frequently house many more occupants than is tradition in most previously white neighborhoods. This requires too many cars and pickups parked on driveways and in the street.
I believe landlords provide inadequate living conditions in communities are known to have immigrants.
I see extremely lax code enforcement everywhere, especially in heavily Asian/Vietnamese areas, whereas people in HP areas or adjacent to Nichols Hills get violations for every tiny thing, because the code people pay attention to wealthier neighborhoods. I have experienced this personally.
Many are not enforced. The city does not want to get involved.
No rental code allows landlords to rent housing in horrible conditions
plenty of property management companies are renting substandard units to black and latino tenants
Some families crowd many, many people into one home so they can afford to save money for their futures, but the parking and trash and noise created by this hinders the whole neighborhood.

Table B.16
Are you aware of any questionable practices or barriers to fair housing choice in property tax policies?
City of Oklahoma City
2014 Fair Housing Survey Data

Comments:
All the city an county wants to do is get more taxes.
I don't believe there should be tax incentives. I believe if one party can receive them then they all can. That IS fair.
Inflated property assessment for tax reasons that do not reflect the actual market value of the property

Table B.17
Are you aware of any questionable practices or barriers to fair housing choice in the permitting process?
City of Oklahoma City
2014 Fair Housing Survey Data

Comments:
Documents should be in both spanish and english. I also don't agree with permitting processes because they are subjective.
Immigrants should learn English. They want the benefits of living in the US but fail to learn to be residents of the US.
Should be English only

Table B.18
Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?
City of Oklahoma City
2014 Fair Housing Survey Data

Comments:
Each city inspector has his own standards, does not read to code very well.
OKC allows absolutely CRAP developers (including the so-called "Habitat for Humanity" to come in and build Edmond-like suburban tract homes that are low in quality, which further undermines neighborhoods. This has to stop!

Table B.19
Are you aware of any questionable practices or barriers to fair housing choice in neighborhood or community development policies?

City of Oklahoma City
2014 Fair Housing Survey Data

Comments:
Federal money seems to go to low income areas, but that is probably by design.
Strong Neighborhoods Inititave limits development funding in TOO narrowly defined areas.
Yes - low to moderate income assisted housing is often concentrated in the same area, leading to collection of all low-moderate income people together instead of mixing throughout the City

Table B.20
Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?

City of Oklahoma City
2014 Fair Housing Survey Data

Comments:
Even with recent improvements, public transportation continues to be a major impediment to those lacking reliable modes of transportation.
In a 621 sq mile city, transportation is an obvious, very serious barrier. It is virtually impossible to live in OKC without a car.
Lack of sustainable and adequate public transportation throughout the metro area.
limited/lack of buses scheduled during certain hours and locations
Many low income apts are built in out of the way places where you must have a car to survive.
Public transportation needs improvement.
Some people are not mentally capable of accessing government services.
The S.S.A. office and workforce: Oklahoma office have been moved to the outskirts of the metro area making access very difficult.
They claim there is not enough housing to do their job correctly.
Transit system here is terrible.
transportation is always an issue .....bus service is limited. Taxi's are costly ...the city is spread out with a huge area to cover with affordable transportation
Yes - almost all access requires a personal vehicle in Oklahoma City

Table B.21
Are you aware of any questionable practices or barriers to fair housing choice in any other public administrative actions or regulations?

City of Oklahoma City
2014 Fair Housing Survey Data

Comments:
Failure to provide alternative transportation to personal vehicles
Yes, no state enforcement or Human rights commission.

C. Minutes from the 2014 Oklahoma City Fair Housing Forum

Michael Figgins: Good afternoon everyone. I am Michael Figgins and I represent Legal Aid Services in Oklahoma. We are an agency that is enforcing fair housing rights along with Mary and her organization, Metro Fair Housing. Let me tell you a little bit about Legal Aid. We have 75 attorneys, you may think that that is a lot of attorneys, but we are statewide with 18 offices throughout the state. Our focus when it comes to fair housing is enforcement. Think of us as the traffic cop, even the homicide cop if you want to. We also do education, because we want people to know what their rights are and we want housing providers to know what they are obligated to do as well. In our area basically we partnership with Metro and it's the entire state. So from one part or the other it is the entire state. If you are in any part of the state you can certainly come and you can basically tell us your story about housing discrimination. Both of us receive complaints and that is what we want. Individuals coming to us and saying that they were denied housing for whatever reason and we advocate. We are advocators. We are in an administrative form. We are in court rooms throughout the state as well as the federal court. We sue housing providers and we are serious about it. It is all about denial of housing. You probably know the seven protected classes, but the housing. I am talking about is rental, sales, and it even involves things like I couldn't get insurance, or I couldn't get credit and anything that denies me housing. It could be a shelter. It could be a group home. It could be access to housing. It could be that the housing is available, but I can't access it because of a disability. The seven protected classes, race, color, religion, disability, national origin, sex, familial disability, that is a family with children, and of course I mentioned it once and I will mention it again disability. In practice Legal Aid that is what we see the most of disability. Individuals with a disability are not allowed housing, because of a disability. Sometimes we have what is called a benevolent landlord who says I don't want to rent to you because it is on the third or second floor and if something were to happen to you, couldn't respond. They have all kinds of reasons, but that is our biggest complaint and our biggest complaint in that area is people with animals. Pets, service animals, comfort pets. Landlords that don't want pets at all, they want to charge a pet deposit and they can't do any of that. So that is what we see at Legal Aid more often than not. I am sure Mary has experiences that are similar or different than that. We do testing with Mary and her organization Metro. Testing means that although discrimination is not as overt as it used to be, people are not going to say that I am not going to rent to you because you are in a wheel chair. They will do the same thing, but they just won't say it, but sometimes we have test and we have other people go in and we find different results. In other words, protected classes are treated differently and we have a test. In practice again disability is our number one thing. Accommodations we ask from certainly with disabled people, but we are here as an agency along with Metro to take your complaints. When I say complaints often you may not think that you have been discriminated against. It may not be clear. A landlord will come you to you and smile, hey this is great if you had been here a day ago I had three apartments, but they all got rented. You leave there and sometimes you have a feeling that that just doesn't sound right. Maybe he just doesn't want me because of my kids. Maybe he doesn't want me because of my race, my color, maybe he doesn't want me because I am disable. More often than not tell us about it. Come to Legal Aid. Come to Metro Fair Housing. We can test and more often than not your gut will be right. So use us as a resource. We are here for you. I'll turn it over to Mary.

Mary Daniels-Dulan: Hi, my name is Mary Daniels-Dulan and I am the executive director of the Metropolitan Fair Housing Council and before I get started about out program and practices, let me introduce you to our staff.

(Introductions)

Metropolitan Fair Housing Council was founded in 1978 as a result of the 1977 National HUD Audit which showed a disparity in in housing practices in Oklahoma and in other areas of the country. It showed differences in treatment for minorities especially, black persons who were renting, trying to rent or either trying to purchase property. The result of that Metro Fair Housing began operations in 1979 and we are pleased to say that the City of Oklahoma City was one of our original primary sponsors. We have an over 30 year relationship with the City of Oklahoma City and it is still going as today. Our agency, we are statewide as Michael stated, but we are a team of six people. We provide resources to the enter state of Oklahoma. We go where we have to go or wherever our gas money will take us. Sometimes it is limited, but thanks to the City of Oklahoma City CDBG it has allowed us to expand services. Inside the City of Oklahoma City this past fiscal year we have processed over 500 allegations of unfair housing practices. Metro Fair Housing provides a variety of resources. We conduct complaint intake, we conduct investigation and assessment of what the housing issue maybe. We will mediate if it is possible to mediate, because we in some years can process somewhere between 900 to 1300 intakes throughout the state and we have to go through that stack of intakes and provide as many resources as we can to determine if there were unfair housing practices that we determined. We also conduct investigations and testing. When Michael explained to you testing. How many of you in the room know exactly what fair housing testing is? A few. How about secret shopping or mystery shopping? In retail? In the housing industry testing is a method of gathering evidence that has been upheld by the Supreme Court and this is where we send. Well some people pay testers, are testers are volunteer. They come from all walks of life, black, white, Hispanic, Asian, young, and old, Native American, you name it. We will give them a role based on the complaining party and we will send them only to that housing provider just to look at their housing practices there. They are not looking for housing discrimination. Many times our testing teams will have a partner and they will not know who their partner is. What we look at is the result of their reports to see if we can find any evidence of unfair housing practices. We are funded also by HUD as Michael stated their program is. As Michael stated their program is. Legal Aid has a new fair housing project. Our agency is the only nonprofit full service fair housing organization. All we do is fair housing. Legal Aid has the ability to do so many other great things. our agency has had a great relationship with Legal Aid back before the Fair Housing Act even had teeth to it we would partner with Legal Aid to make sure that complainants had remedy even before the Fair Housing Act added any type of enforcement or penalties to it. We were very successful in partnering with Legal Aid for many years and we want to keep that going. One of the things that we do look at here is determining if there are unfair housing practices, we make sure that the complaint is ready to be filed with HUD and like Michael says we both serve as advocates. So when the complaint if filed we flow with it all the way through because we are the advocate for the complaining party. The housing provider has the resource to get attorneys to get whatever. So, the Housing Community Development Act was amended to allow HUD to fund private non-profits or to fund for advocacy for the complaining party and that is how we are able to get fair housing enforcement funds, but I want to thank you. Many organizations in this room provide referrals to us and based on your referrals we continue to operate and we appreciate it. Thank you so much and thank you to the City for your continued partnership with Metro Fair Housing.

Comment 1: I don't have a question or anything, but my name is Candice Milard and I am with the Oklahoma Attorney General's Office of Civil Rights Enforcement. So I wanted to say something and I was talking to a young lady here that there is a third agency who can also help with those complaints. We can take complaints and we can take investigation and intake all the way through. We get referrals and I know that we have gotten some from Legal Aid and Metro being that they are an all-in-one agency and they can take care of everything. They don't have the problems that the office of Legal Aid might have in having to deal with other issues. They can take care of a lot of those themselves. I just wanted to say hello and tell you that other is a third agency. We are just trying to get ourselves together. The Human Rights Commission they have those duties over to the Attorney General's Office. So I see civil rights enforcement is just coming back onto the scene. If you have any questions, please contact us.

Comment 2: One thing that I wanted to say after Ms. Dulans introduction was that I found them to be a fantastic resource years ago, 18/15 years ago when I first meet Metro Fair Housing. We had a lot of landlord/tenant disputes in the communities that I was working with and they have forms. When they say that they are a full-service agency they truly are. They can provide a lot of advice. Some of the most victimized people in the communities are students at the universities. They are very good at reading leases and I am sure that Legal Aid is too, at helping guide students and their parents through various issues with leases in apartments and houses and all kinds of things. I just wanted to point that out that that is something that I think all of us really need to and when we are talking about discrimination and keeping in mind that the simple things like leases and understanding leases and if an I supposed to pay my rent if my heat is not on and all of those things that are Landlord/Tenant Act that these individual can help with that too. One more thing that I want to mention is ULI Institute and they helped to promote this for us. So I wanted to thank you for being here.

(Presentation)

Comment 3: Are you seeing anything distinct here, how are our issues compared to some others?

Rob Gaudin: To be honest with you, some of the low-income housing seems to be more concentrated here.

Comment 4: Really.

Rob Gaudin: That is really may be a function of the openness at which that data was shared. So the other city close to here that we worked with that had this problem was Fort Worth. So it is similar to Fort Worth's issues.

(Panel Discussion)

Comment 5: The first thing we would like to talk about and I will throw this out to our experts is here are some of the comments that maybe some of you have mentioned in the survey. It is obviously this was a good thing to do here tonight. The lack of fair housing education is obvious and it sounds like we need to do this more often. So for each of you, do you have this kind of opportunity? How often do you talk to the public and would you be willing got talk to the public more and educate the landlords, builders, developers, city leaders about this?

Comment 6: That is one of our goals with the Office. We are pretty new. So, that is why we are trying to get out there and get our name out there and let people know that we are here and

available. So those are some things that we are planning to do is some outreach and some education in the future.

Comment 7: Approximately 15 percent of our work is fair housing education and outreach. We conduct training for not only housing providers with the assistance of the Oklahoma City Housing Authority, the State Housing Finance Agency, the Association of Housing Authorities everywhere in the state. We have a long list of housing providers that we provide education to in a public and private sector and in terms of the consumer sector; we are a consumer driven agency. We provide training one on one in groups. We are grass roots. We do churches, we go wherever we need to go and that has been our history for more than 35 years. We conduct a large mail out and we counsel every day and all through the day. Just today we were called all kind of names and then they cried and thanked us at the end of the day for all the great work that we did. So we have been threatened with people coming and you name it and we (inaudible). A large part of what we do is education. I'll tell you there is a lot and even when we partner and when we do fair housing training for builders, developers, professionals who are seeking subsidized housing money. It is HUD funded training and our training is free. We have little or no participation. The only time that we see it is if we find a violation. Like in the City of Oklahoma City when we found violations of the design construction requirements. So and I will pass this on. It is a lot of effort. Even when we are dealing with unfair practices with the private sector market, it is really an uphill battle. It is a lot of apathy. Not just in Oklahoma City, but in the surrounding areas, but thanks to CDBG offices in Oklahoma City, Norman, Edmond, and more we have a greater outreach because of those CDBG programs and directors are making sure that their recipients don't just raise their right hand and say that they affirmatively further fair housing. That they are actually holding their hands to the fire and saying we appreciate that.

Comment 8: Understand that I work for her and she just said everything that I would have said. So I am just going to defer to what she said.

Comment 9: We all work for her in the back.

Comment 10: At Legal Aid we are not turning down any invitations for anyone and I don't care if it is as big as a group of one to educate them on fair housing. In addition to responding to invitations, we are affirmatively going to where we think potential victims of fair housing discrimination may be. That could certainly be a women's group. Specifically at domestic violence shelter. DV need to be protected as somebody disabled as well as their sex. We are concerned with landlords who use sex as a way to gain favors and again directed at females or at the senior centers many of them are disabled and can live independent, but that is being denied by housing providers who won't rent to someone with a disability. Or at schools, elementary schools and families with children and we are targeting at those locations who are being denied housing opportunities that can cause them to have to move and disrupt their child's education just because they have children. We are targeting churches, whether they be black, Latino, Asian and certainly non-profits serving those same groups. We are looking at vets. A lot of those vets are homeless and housing is their primarily concern and they are being denied also because of disability and they may have some kind of traumatic injury and we are trying to educate as many as we can and what we find is that our best education tool is successful advocacy. When people find out that they are being discriminated against. They don't like that. That is not a good feeling. You feel bad. You are hurt. You want some kind of a redress. You want justice. When you get it they are the best advocate that we have. They will

go back to their peers and say yes that happen to me and I went to Metro Fair Housing, or I went to Legal Aid, and they helped me.

Comment 11: I would like to hear from the crowd. How do we prevent this and that is from education? Do we need to start a campaign, an education campaign, but and I am sorry, but the maps that I saw tonight are very offensive to me. What can we do to prevent this?

Comment 12: I was wanting to go back to the maps, because it seems like it is right in my area and I was wondering where the locations and how far it is from (address).

Comment 13: I have a question for you Rob. You listed as a protected class age. Can you give us examples of that? Is it a legally protected class?

Rob Gaudin: I think it is over 40.

Comment 14: Under the State Fair Housing Act not the Federal.

Rob Gaudin: Under that state, that is correct.

Comment 15: Can you give us examples of discrimination for age?

Rob Gaudin: I would like to defer to someone who has the most experience with that?

Comment 16: Is it because I have gray hair?

(Laughter)

Comment 17: If we are talking about difference in treatment based on age, we have seen a trend and especially around some of the schools that they want to have a younger community and they do not want us old geezers around. They may be quietly denying housing to older people, because they want a much younger and vibrant community. There could be a person who was seeking a loan and be denied because you may think they may not know it, but because of their age. If they fell into the 50 or 60 year range and that age they could be denied housing because, I mean denied the loan because of their age. On the flip side when you are looking at predatory lending practices, like the subprime market and back a few years ago they didn't care if you were 70 or 75 they would give you a 30 year mortgage on a predatory 12 or 14 percent loan. That is the flip side.

Comment 18: For the denial rates or for poverty rates?

Rob Gaudin: Each of these maps has poverty as the background color.

Comment 19: One of the questions that I have and it is a more specific of what is discrimination? This happened yesterday and we were driving through one of the neighborhoods and there was an apartment complex and on the side of it said adults only.

Comment 20: Oh where is it?

(Laughter)

Comment 21: That is a violation. I took a picture of it. Things like that are what we are talking about. That is an obvious one and it is close to a university in our community. What would

happen if I called you and said this is a complaint? Am I filing the complaint with you? How would that work?

Comment 22: You can actually let us know, but being a private non-profit full service fair housing group, if we didn't have an injured or complaining party, we could bring the complaint, because once that preference has either been stated or printed or whatever it is then it is a violation. When you say adults only that is a violation of family status, unless it is senior property. If it is a senior property it is an exception, but a lot of and this is what I was telling you around universities. We found a lot of in Norman and in Moore, they state adults only. As a matter of fact why don't you tell them about the adults only ads we saw in the newspaper. I believe there were 14 claims a couple of years ago.

Comment 23: This is two years ago, but there is a mixture in between that. When she was talking about the university there was one very specific instant where we had adults only, but they were actually transitioning. It has to 80 percent capacity of 55 or older to be considered an adult only community. You can't be transitioning, like you can't say that you are a little bit pregnant. There is no such thing as transitioning into an adults only community. As far as the ads in the paper we would see a lot saying adults only, single occupancy only, adults preferred and all of that is a violation of familial status.

Comment 24: Does anyone else have any questions that are related to that or you just want to know if something is illegal or not?

Comment 25: So why is it discrimination if you say adults only and it is not discrimination for senior projects, for 55 and older or 62 and better?

Comment 26: Because that is the exemption that she just told you about. It is an exemption because of the 55 or 62 it has to hold itself out as being that and there are guidelines for a percentage of that property has to be that population. So basically that is a set aside for seniors, but when they say adults only that is just a scam to get rid of kids. That is just a scam because they don't want children there. Once they and we have had complaints where you might have a mom and pop who has just one house, they wouldn't be covered under the Federal Fair Housing Act, if they didn't advertise and they just had a practice that we didn't know about. Once they print or hire someone like a real estate agent, they lose their exemption. So like those ads we found in the paper, a lot of those ads and people who where placing those ads it could have been their only rent house. Well once that preference was issued they lost their exemption. Then there were, they have to have at least four properties including their own to be covered under the Fair Housing Act, but if you have one property and you use the services of a Realtor or broker or you advertise then you will be in violation.

Comment 27: I have two questions I wanted to ask if sexual orienatation is something that you could claim as discrimination and the second one is when a property owner decides to rent out his or her property do they go through, are they forced to go through any sort of education? Are they aware of what discrimination? Is that something that they have to gather information on themselves or what kind of process is there?

Comment 28: Yes, they have to find out that information by themselves. It is important for them to come to things like this so that they can get that information, but other than that there is not a requirement to educate themselves about the laws. Sexual orientation, not just yet. It is not a protected class as far as discrimination is concerned.

Comment 29: There is an exception. The exception is if there are any federal dollars attached to it. If there are any federal dollars attached to the property then HUD has a ruling that there could be a complaint if we are looking at LGBT complaints with and originally HUD instructed us to take those types of complaints under any protected class we could fit it under generally sex, because there are so many properties across the country that have federal dollars and because of the movement in the LGBT community in the past ten years, HUD was forced to come out with a policy stating that it is a violation if you discriminate against someone based on sexual orientation, but that is only in HUD properties.

Comment 30: I believe that as September 5th that that ordinance came out.

Comment 31: I can give you any example where we have had some success with gender discrimination. It had to deal with two men and they were gay and they went to rent and they were open about their situation and the landlord just basically said that I am not going to rent to gay men because one or both of you is going to have AIDS. He made that statement and it made it in all sincerity, because that is what his belief was and under those fair housing it was if you think that someone is disabled and neither one of these gentlemen had AIDS or anything. So we were able to actually enforce their fair housing rights using disability even though they weren't disabled. In fact it was because the landlord thought they were disabled. There are a lot of landlords that make this association that there is something wrong with gay people and some have a disease or something is going to happen. So sometimes you can use that, but as Mary says with the new federal dollars, and it is any federal dollar and you can especially for complexes and HUD and public housing you can enforce those rights now.

Comment 32: Are there any other questions for the panel? What about suggestions for improvement for the community. Rob mentioned earlier that one of the reasons we do this is because we are right now in the process of developing our Five-Year Consolidate Plan that we submit to HUD. In that plan it includes the list of impediments from this study to fair housing and also lists what we're going to do about them. So I would love to hear your thoughts about what we can do about these things. I think the first and foremost one is education. I am certainty going to take a pledge to make sure that we communicate better with these folks and work with them more to get the word out. There are also mortgage lenders and bankers that may have some ideas about how we can improve. So raise your hand and tell us quick what you think we could do.

Comment 33: I would think as far as education. I think we can do it all day long. I know we had three trainings scheduled tomorrow as far as fair housing and I know that out of those three last week five people showed up. I know that for a fact that over a thousand flyers went out and we got five people. The word is going out. It just comes down to do you take advantage of it? It is a matter of reading information and going forward with it.

Comment 34: I would like to piggyback on that too. You have so much development that is going on, family properties being developed. Even when we have HUD sponsored free training on design and construction requirements under the Fair Housing Act and we mail out, send out, you name it to developers or whatever, but we don't see anybody come unless there is a complaint filed against them. There is no mechanism in these cities, once these cities are built, to come behind them to see if they are in compliance with the Fair Housing Act as designed construction requirement. They only way that we can tell is if we test it. We tested a property, we tested several properties in Bricktown and we found a property a couple of years ago and on the blueprint it was accessible, but the contractor, the builders skipped some corners and

our volunteer tester, who was in a wheelchair, when he went to that property he couldn't use his chair in the kitchen. He couldn't get around the island. So we have a lot of apathy. Until and this ties to what Rob was saying earlier, why are we filing so many complaints and then in the end there is no cause. Well it is a whole bunch of political stuff that I am not going to say today because it burns me up. When you look at an agency that deals with civil rights and did so historically, the Human Rights Commission, and set legislature that closed their door on June 20th, 2012 and almost six to eight months prior to that they stopped taking cases, they wanted a staff with a subsequently agency to do their investigations in Oklahoma. They had three in Tulsa, three in Oklahoma City including a supervisor and investigator. If there was a claim they could investigated under the Federal Fair Housing, the State Fair Housing Act, they could respond very quickly. So these complaints went to the Region VI HUD office in Fort Worth. Region VI covers Texas, New Mexico, Arkansas, and Louisiana. When those complaints are filed with HUD the same number of investigators they had with HUD they still have that same number. So, Oklahoma lost six or seven investigators. Now if a complaint is investigated we file or Michael files that investigator may come from Oklahoma City, but they only have two investigators in Oklahoma City. They just got one more. They have three that makes three. That investigator is now coming from Arkansas, its coming from New Orleans, its coming from Fort Worth, Texas. They have a triple case load and no new employees. To me and there is also a problem that I feel, it can be a problem, but initially when you look at fair housing complaints that are filed it is a part of the Fair Housing Act the investigator must try to resolve the complaint as soon as they can. It's called conciliation. They must do so every step of the process. What would it take to resolve this? At Metro between the 1,200 or 1,300 cases we mediate the majority of them. We only file about 80 to 85 a year out of however many hundreds of the complaints that we intact because we work through those cases. We provide counseling and resources, but then when the complaint is filed there are other wheels that are turning. Who wants to bring cause, because when they bring cause the complaint changes from let's say Mr. and Mrs. Smith verses this apartment complex to the United States and Mr. and Mrs. Smith verses this. So it has to go to HUD's legal department and they have to issue a cause determination and in Region VI and if you compare and Rob has looked at other regions throughout the country, you can show that there are higher incidences of cause and basis issues compared to Region VI. I am not knocking Region VI. I know that they are strapped for money and they are doing the best that they can do. My best friends are there, but it has no money and it is the same number of investigators and they now have a triple case load. So they are trying to settle/resolve/settle/resolve/settle/conciliate and one by one many of those cases we have some resolve as little as $88 and some for several thousand. Those are the cases that you want and you are not going to see unless we put those in our newsletter. These cases many of them are mediated or resolves, but it is really a travesty to fair housing or to civil rights when you have so many complaints being files and then it bogs down. Then the case may sit for one to two years. We still have cases open from December 2011.

Comment 35: I would agree with Mary that there is some apathy and I think housing discrimination is not a part of conscientious like it should be. We have leaders in this nation that will tell us racism is dead and it is not a problem anymore, but believe me it is alive and well and to some extent it has gone underground and to some extent it is not so underground. It is out there and it wasn't that long ago I heard something called Ebola. I didn't know what it was. It was far away and it is never going to impact me, but the next thing that you know it is here. It is in Texas and someone is dying. We all know about it now. Some of us are afraid of it. It is a part of our conscientiousness. We need to have significant victories in fair housing. We need to have somebody and take them to court. Get a large result settlement and bring it to

the newspaper. People will be like I didn't know that was going on around here. Mary is right and a lot of these cases settle and it is confidential. The reason it is confidential and that is the last thing that a housing provider wants is for somebody to say they found you guilty of housing discrimination. That is a black eye you will never get over. So it is kind of kept under the rug sometimes, but it is happening and we need to get it out in the open and pull the curtain back. Legal Aid, we certainly file administrative complaints just like Mary does. We certainly file with HUD as well as the Attorney General's Office. I can tell you when housing providers get that letter from Attorney General Scott Pruitt; they tend to get a little more responsive then when they get letters from us. We are real happy with that. I am hoping that we will get our substantial equivalent investigation agency back here soon and I hope it is in the Office of the Attorney General. We are going to keep doing the best that we can. We will get those victories and I am looking forward to the day when you will read about Mary. You will read about Legal Aid. You will read about Metro Housing in the paper and you will think hey I remember talking to those guys one day and they are doing good work. That is what we are going to do?

Comment 36: Are there any other questions from the audience?

Comment 37: I have a question. Do other states have requirements that landlords certify that they have not pledged with the Landlord/Tenant Act and require continuing education? You talk about apathy and you offer all of these landlords don't care. Do other states require that knowledge of continuing education to be a landlord?

Comment 38: I am going to say that I doubt it very seriously.

Rob Gaudin: No.

Comment 39: Does the Housing Authority require their landlords to do training?

Rob Gaudin: No, the one thing that I will say is you can use some points in your allocation and you completion between projects for people to come to the training so they can get that Tiff. So can control a little bit.

Comment 40: Rob from your experience what do you see municipalities, how do they respond to some of these impediments?

Rob Gaudin: In the last few years people have taken this concentration rather seriously and tried to figure out a way to authorize the points for these kinds of projects. They are all publically assisted so that they are not so much. Like states and their qualifying allocation plans, from low-income housing tax credits are getting away from putting extra points in areas of high poverty, but trying to dissipate the credit around a little bit. I think cities are doing the same thing.

Comment 41: Anything else from anybody.

Comment 42: Just a real quick question. (Inaudible) In one of the poverty stricken areas that is largely Hispanic school and she is bilingual and speaks Spanish and everything and the Cub Scout group. I was there yesterday leading the Cub Scout group and those kids need more than my kids. What do you do and I know my wife talks to a lot of parents who are making changes in housing and or in a pretty tough situations and had to stay in hotel rooms while they try to mediate whatever is going on with their apartments. That is something that my wife isn't

familiar with are a lot of the fair housing laws, but if she were and other teachers at her school were they could probably help and refer a lot of these people to your agencies to get help. My second part of that is how much of your outreach and you mentioned that you had three venues in the past weeks and five people showed up. Where any of those in a public school venue?

Comment 43: They were all in public libraries at different parts of the city. One was on the Southside; second one was on the Northside.

Comment 44: Also, many of those there was a partnership that Legal Aid and Metro, they also has support from local Housing Authorities. The local Housing Authorities gave those addresses up and mailed those out to their recipients, but like a thing when you are in the community and you don't respond to what is happening to you, you are not trying to come to a meeting at 4, 5, or 6 o'clock in the evening. You are trying to get off and feed your kids and get them ready to go to school and do this and do that, just like everybody else is. One thing that we were able to do with the housing provider was we and the states, I hate to say Housing Authority, Oklahoma Housing Finance Agency who mandated that their Section 8 landlords attend fair housing training. We had a large training in Tulsa, a large one in Oklahoma City and in each one we had 200 landlords attend. They didn't want to, but they attended. Until we have entities that pass out that money to multi-family properties and say part of this you need to go to fair housing training. Until the dollar, you have to follow the money until somebody puts a condition on the funding; they are going to get by. They are going to raise their head and say like in Westchester. We say that we swear by affirmatively further fair housing. Everybody is going to swear and sign that we are doing the right thing and it happens until they get busted.

Comment 45: I want to pull up real quickly my email address. If any of you have ideas that you think of later that we could implemented or include in our list of how we are going to address some of these problems. I don't care what it is. Please email it to me you can also call me. Don't be apathetic about this. I think that the data does show that we need to address this someway somehow. Maybe it's through some other complaining. I think this apathy is just say fair housing and what is this. I think there are other ways to market this and help these individuals. Please do send me your ideas and we will include them in your action plan. We have some meetings coming up.

Comment 46: I was going to make a suggestion. I think the State Fair would be a great venue to maybe have a booth of your organization to hand out information. You get a diverse group of people who may need those services and the garden shows.

Comment 47: Nobody is looking for fair housing information at there…

(Laughter)

Comment 48: You have a housing building in Edmond.

Comment 49: Years ago I work in Edmond and we invited and we invited the UCO in Edmond and we did a mass event to invite students and we gave really blunt examples on why they should be coming to these and bad examples of Landlord/Tenant Act issues and all of that. Hardly anyone came and in Stillwater I worked there too and we had a big off campus student housing association and tried to bring the students in and then we had a record number of discrimination cases that year. It is hard to try to figure out ways to get people to show up, but

not just the Landlord/Tenant Act and it is not just the renter situation. It is the mortgage side. We saw the lending issues that we have. We need to communicate more with our communities to figure out how to deal with that. The good thing is it is improving from the 2008/2009 era, but it is and we don't even want to be a percentage point on the radar. So certainty please do send me that information and please reach out to those individuals in your own organization to talk to your groups about what is fair housing and what is fair housing discrimination, what are some Landlord/Tenant Act issues and complaints that they can help address and mediate. Thank you all for coming.

D: Additional Tables

Table D.1
Cost Burden and Severe Cost Burden by Tenure
City of Oklahoma City
2000 Census & 2012 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	56,700	76.8%	10,497	14.2%	6,142	8.3%	537	.7%	73,876
2012 Five-Year ACS	65,763	71.0%	17,218	18.6%	9,256	10.0%	386	0.4%	92,623
Owner Without a Mortgage									
2000 Census	30,990	89.1%	1,925	5.5%	1,150	3.3%	719	2.1%	34,784
2012 Five-Year ACS	38,823	87.5%	3,044	6.9%	2,061	4.6%	439	1.0%	44,367
Renter									
2000 Census	46,663	56.4%	15,138	18.3%	13,958	16.9%	6,910	8.4%	82,669
2012 Five-Year ACS	41,033	45.6%	20,515	22.8%	21,890	24.3%	6,517	7.2%	89,955
Total									
2000 Census	134,353	70.2%	27,560	14.4%	21,250	11.1%	8,166	4.3%	191,329
2012 Five-Year ACS	145,619	64.2%	40,777	18.0%	33,207	14.6%	7,342	3.2%	226,945

Table D.2
Fair Housing Complaints by Issue
City of Oklahoma City
2004–2014 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Discriminatory terms, conditions, privileges, or services and facilities	2	6	12	13	18	24	21	39	10	17	13	175
Discriminatory acts under Section 818 (coercion, etc.)	2	2	10	17	14	12	14	32	13	9	11	136
Discrimination in term, conditions or privileges relating to rental	9	15	13	15	10	6	2	10	8	3	1	92
Discriminatory refusal to rent		3	7	2	13	5	3	11	2	4	1	51
Discriminatory refusal to rent and negotiate for rental	5	6	4	7	1	4	1	3	1	1	2	35
Failure to make reasonable accommodation	1	4	3	1	1	4	3	6	3	6	3	35
Discriminatory financing (includes real estate transactions)		1	1	4	1	1	1	1		1		11
Discrimination in terms, conditions, privileges relating to sale		1	1	4	1		3					10
Discriminatory refusal to sell and negotiate for sale	1	1			3	1	1		1			8
Discriminatory refusal to negotiate for rental		1	3	2			2					8
Non-compliance with design and construction requirements (handicap)						8						8
False denial or representation of availability - rental	1	2				2						5
Steering			1	1	1	1	1					5
Other discriminatory acts			2	1				2				5
Failure to permit reasonable modification						2	1		1	1		5
Discrimination in the appraising of residential real property							4					4
Discriminatory refusal to sell						1			1		1	3
Discrimination in the terms or conditions for making loans	1		1							1		3
Otherwise deny or make housing available				1				1		1		3
Discriminatory advertising, statements and notices		1									1	2
Discriminatory advertisement - rental							1			1		2
False denial or representation of availability - sale				2								2
Blockbusting - rental	2											2
Discriminatory refusal to negotiate for sale			1									1
Discrimination in making of loans										1		1
Discrimination in the selling of residential real property							1					1
Discriminatory brokerage service	1											1
Discrimination in services and facilities relating to sale									1			1
Discrimination in services and facilities relating to rental								1				1
Total Issues	**25**	**43**	**59**	**70**	**63**	**71**	**59**	**106**	**41**	**46**	**33**	**616**
Total Complaints	16	28	30	33	35	38	34	54	20	22	15	325

Table D.3
Fair Housing Complaints Found With Cause by Basis
City of Oklahoma City
2004–2014 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Disability		1	2	1	1	4	3	4	7	3	2	28
Race	2	4	2	3	2	3	2	2	3	1		24
Family Status			1		2	2		6	3	2		16
Sex			1	1	3		2	4	1	1		13
National Origin		1	1	2			1	2				7
Retaliation						1						1
Total Bases	**2**	**6**	**7**	**7**	**8**	**10**	**8**	**18**	**14**	**7**	**2**	**89**
Total Complaints	2	5	7	6	6	8	5	14	9	5	2	69

Table D.4
Fair Housing Complaints Found With Cause by Issue
City of Oklahoma City
2004–2014 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Discriminatory terms, conditions, privileges, or services and facilities	2		2	3	3	3	5	8	6	5	1	38
Discriminatory acts under Section 818 (coercion, etc.)		1	1	2	3	3	2	7	5	2		26
Discrimination in term, conditions or privileges relating to rental		4	3	3	2	3		4	3			22
Discriminatory refusal to rent		2	1		4	1	2	3	1			14
Failure to make reasonable accommodation			1			1	1		2	2	1	8
Discriminatory refusal to negotiate for rental		1	3									4
Discriminatory refusal to rent and negotiate for rental		1		1				1	1			4
False denial or representation of availability - rental		1				1						2
Non-compliance with design and construction requirements (handicap)						2						2
Discriminatory refusal to sell and negotiate for sale						1						1
Discriminatory advertising, statements and notices		1										1
Discriminatory financing (includes real estate transactions)						1						1
Discrimination in services and facilities relating to rental								1				1
Otherwise deny or make housing available								1				1
Total Issues	**2**	**11**	**11**	**9**	**12**	**16**	**10**	**25**	**18**	**9**	**2**	**125**
Total Complaints	2	5	7	6	6	8	5	14	9	5	2	69

E: Additional HMDA Tables

Denial Rates

Table E.1
Loan Applications by Action Taken
City of Oklahoma City
2004–2013 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Loan Originated	10,592	11,676	11,795	9,562	7,474	7,203	6,471	6,093	7,076	7,676	85,618
Application Approved but not Accepted	1,161	1,196	1,284	927	529	340	419	437	428	508	7,229
Application Denied	2,323	2,778	2,638	1,789	1,425	965	1,092	1,107	1,326	1,363	16,806
Application Withdrawn by Applicant	1,159	3,084	1,510	962	840	798	724	590	678	917	11,262
File Closed for Incompleteness	356	394	368	277	143	125	112	131	127	200	2,233
Loan Purchased by the Institution	4,675	5,281	6,312	5,601	4,405	5,315	4,265	3,806	4,322	4,663	48,645
Preapproval Request Denied	0	84	9	2	3	27	0	0	0	2	127
Preapproval Approved but not Accepted	0	0	1	0	2	1	0	0	0	2	6
Total	**20,266**	**24,493**	**23,917**	**19,120**	**14,821**	**14,774**	**13,083**	**12,164**	**13,957**	**15,331**	**171,926**
Denial Rate	**18.0%**	**19.2%**	**18.3%**	**15.8%**	**16.0%**	**11.8%**	**14.4%**	**15.4%**	**15.8%**	**15.1%**	**16.4%**

Table E.2
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
City of Oklahoma City
2004–2013 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
American Indian	Originated	241	211	270	219	147	194	157	163	219	274	2,095
	Denied	79	66	67	49	36	31	33	41	41	46	489
	Denial Rate	24.7%	23.8%	19.9%	18.3%	19.7%	17.4%	17.4%	20.1%	15.8%	14.4%	18.9%
Asian	Originated	477	476	504	383	310	307	270	252	333	336	3,648
	Denied	67	94	93	70	72	46	49	58	48	54	651
	Denial Rate	12.3%	16.5%	15.6%	15.5%	18.8%	13.0%	15.4%	18.7%	12.6%	13.8%	15.1%
Black	Originated	814	998	987	579	450	431	413	313	362	362	5,709
	Denied	334	502	529	285	166	115	113	83	114	105	2,346
	Denial Rate	29.1%	33.5%	34.9%	33.0%	26.9%	21.1%	21.5%	21.0%	23.9%	22.5%	29.1%
White	Originated	8,237	9,220	9,270	7,728	6,111	5,763	5,163	4,907	5,667	6,128	68,194
	Denied	1,433	1,681	1,604	1,155	1,000	673	779	794	938	964	11,021
	Denial Rate	14.8%	15.4%	14.8%	13.0%	14.1%	10.5%	13.1%	13.9%	14.2%	13.6%	13.9%
Not Available	Originated	775	761	757	648	450	503	462	453	490	574	5,873
	Denied	391	435	343	230	151	100	118	130	185	194	2,277
	Denial Rate	33.5%	36.4%	31.2%	26.2%	25.1%	16.6%	20.3%	22.3%	27.4%	25.3%	27.9%
Not Applicable	Originated	48	10	7	5	6	5	6	5	5	2	99
	Denied	19	0	2	0	0	0	0	1	0	0	22
	Denial Rate	33.5%	36.4%	31.2%	26.2%	25.1%	16.6%	20.3%	22.3%	27.4%	25.3%	18.2%
Total	**Originated**	**10,592**	**11,676**	**11,795**	**9,562**	**7,474**	**7,203**	**6,471**	**6,093**	**7,076**	**7,676**	**85,618**
	Denied	**2,323**	**2,778**	**2,638**	**1,789**	**1,425**	**965**	**1,092**	**1,107**	**1,326**	**1,363**	**16,806**
	Denial Rate	**18.0%**	**19.2%**	**18.3%**	**15.8%**	**16.0%**	**11.8%**	**14.4%**	**15.4%**	**15.8%**	**15.1%**	**16.4%**
Non-Hispanic	Originated	8,136	9,891	9,868	8,140	6,521	6,276	5,492	5,203	6,101	6,639	72,267
	Denied	1,560	2,062	1,891	1,303	1,094	750	811	806	903	943	12,123
	Denial Rate	16.1%	17.3%	16.1%	13.8%	14.4%	10.7%	12.9%	13.4%	12.9%	12.4%	14.4%
Hispanic	Originated	824	976	1,180	816	539	442	508	449	464	497	6,695
	Denied	320	307	366	249	184	121	160	160	193	182	2,242
	Denial Rate	28.0%	23.9%	23.7%	23.4%	25.4%	21.5%	24.0%	26.3%	29.4%	26.8%	25.1%

Table E.3
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
City of Oklahoma City
2004–2013 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	50	128	271	1,459	227	1	2,136	330
Employment History	12	16	29	235	29	1	322	81
Credit History	128	106	548	2,561	476	5	3,824	523
Collateral	28	43	116	749	113	4	1,053	133
Insufficient Cash	8	20	47	281	41	1	398	78
Unverifiable Information	23	47	113	410	82	2	677	104
Credit Application Incomplete	22	68	139	814	141	4	1,188	139
Mortgage Insurance Denied	0	2	1	26	6	0	35	6
Other	43	72	363	1,172	282	2	1,934	249
Missing	175	149	719	3,314	880	2	5,239	599
Total	**489**	**651**	**2,346**	**11,021**	**2,277**	**22**	**16,806**	**2,242**
% Missing	35.8%	22.9%	30.6%	30.1%	38.6%	9.1%	31.2%	26.7%

Table E.4
Loan Applications by Selected Action Taken by Gender of Applicant
City of Oklahoma City
2004–2013 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Male	Originated	7,191	7,820	7,935	6,401	5,058	4,702	4,190	4,013	4,694	5,138	57,142
	Denied	1,425	1,636	1,503	1,052	834	585	669	697	793	849	10,043
	Denial Rate	16.5%	17.3%	15.9%	14.1%	14.2%	11.1%	13.8%	14.8%	14.5%	14.2%	14.9%
Female	Originated	3,158	3,545	3,539	2,831	2,153	2,203	1,949	1,777	2,017	2,171	25,343
	Denied	746	938	960	602	502	325	361	346	416	398	5,594
	Denial Rate	19.1%	20.9%	21.3%	17.5%	18.9%	12.9%	15.6%	16.3%	17.1%	15.5%	18.1%
Not Available	Originated	236	300	314	325	254	293	326	296	360	365	3,069
	Denied	152	202	173	135	89	55	62	63	117	116	1,164
	Denial Rate	39.2%	40.2%	35.5%	29.3%	25.9%	15.8%	16.0%	17.5%	24.5%	24.1%	27.5%
Not Applicable	Originated	7	11	7	5	9	5	6	7	5	2	64
	Denied	0	2	2	0	0	0	0	1	0	0	5
	Denial Rate	.0%	15.4%	22.2%	.0%	.0%	.0%	.0%	12.5%	.0%	.0%	7.2%
Total	**Originated**	**10,592**	**11,676**	**11,795**	**9,562**	**7,474**	**7,203**	**6,471**	**6,093**	**7,076**	**7,676**	**85,618**
	Denied	**2,323**	**2,778**	**2,638**	**1,789**	**1,425**	**965**	**1,092**	**1,107**	**1,326**	**1,363**	**16,806**
	Denial Rate	**18.0%**	**19.2%**	**18.3%**	**15.8%**	**16.0%**	**11.8%**	**14.4%**	**15.4%**	**15.8%**	**15.1%**	**16.4%**

Table E.5
Loan Applications by Income of Applicant: Originated and Denied
City of Oklahoma City
2004–2013 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
$15,000 or Below	Loan Originated	115	97	105	63	35	45	47	30	17	26	580
	Application Denied	122	95	56	49	45	33	52	54	51	41	598
	Denial Rate	51.5%	49.5%	34.8%	43.8%	56.3%	42.3%	52.5%	64.3%	75.0%	61.2%	50.8%
$15,001 –$30,000	Loan Originated	1,832	1,735	1,615	1,213	822	1,020	861	710	658	543	11,009
	Application Denied	691	758	666	414	323	230	265	279	351	288	4,265
	Denial Rate	27.4%	30.4%	29.2%	25.4%	28.2%	18.4%	23.5%	28.2%	34.8%	34.7%	27.9%
$30,001 –$45,000	Loan Originated	2,506	2,788	2,693	2,167	1,743	1,850	1,539	1,245	1,405	1,471	19,407
	Application Denied	621	722	677	420	380	229	286	266	314	337	4,252
	Denial Rate	19.9%	20.6%	20.1%	16.2%	17.9%	11.0%	15.7%	17.6%	18.3%	18.6%	18.0%
$45,001 –$60,000	Loan Originated	1,978	2,317	2,251	1,749	1,465	1,368	1,130	1,139	1,287	1,369	16,053
	Application Denied	385	459	507	319	238	173	179	204	226	253	2,943
	Denial Rate	16.3%	16.5%	18.4%	15.4%	14.0%	11.2%	13.7%	15.2%	14.9%	15.6%	15.5%
$60,001 –$75,000	Loan Originated	1,442	1,460	1,544	1,256	974	905	820	797	967	1,109	11,274
	Application Denied	165	257	253	149	140	99	89	98	119	146	1,515
	Denial Rate	10.3%	15.0%	14.1%	10.6%	12.6%	9.9%	9.8%	10.9%	11.0%	11.6%	11.8%
Above $75,000	Loan Originated	2,507	2,990	3,308	2,967	2,366	1,940	2,027	2,111	2,699	3,092	26,007
	Application Denied	270	399	404	386	263	179	198	187	245	281	2,812
	Denial Rate	9.7%	11.8%	10.9%	11.5%	10.0%	8.4%	8.9%	8.1%	8.3%	8.3%	9.8%
Data Missing	Loan Originated	212	289	279	147	69	75	47	61	43	66	1,288
	Application Denied	69	88	75	52	36	22	23	19	20	17	421
	Denial Rate	24.6%	23.3%	21.2%	26.1%	34.3%	22.7%	32.9%	23.8%	31.7%	20.5%	24.6%
Total	**Loan Originated**	**10,592**	**11,676**	**11,795**	**9,562**	**7,474**	**7,203**	**6,471**	**6,093**	**7,076**	**7,676**	**85,618**
	Application Denied	**2,323**	**2,778**	**2,638**	**1,789**	**1,425**	**965**	**1,092**	**1,107**	**1,326**	**1,363**	**16,806**
	Denial Rate	**18.0%**	**19.2%**	**18.3%**	**15.8%**	**16.0%**	**11.8%**	**14.4%**	**15.4%**	**15.8%**	**15.1%**	**16.4%**

Table E.6
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
City of Oklahoma City
2004–2013 HMDA Data

Race		<= $15K	$15K– $30K	$30K– $45K	$45K– $60K	$60K– $75K	> $75K	Data Missing	Total
American Indian	Loan Originated	13	337	511	433	265	506	30	2,095
	Application Denied	28	132	123	87	41	69	9	489
	Denial Rate	68.3%	28.1%	19.4%	16.7%	13.4%	12.0%	23.1%	18.9%
Asian	Loan Originated	30	551	870	692	420	1,023	62	3,648
	Application Denied	30	114	171	126	69	102	39	651
	Denial Rate	50.0%	17.1%	16.4%	15.4%	14.1%	9.1%	38.6%	15.1%
Black	Loan Originated	52	970	1,680	1,195	707	1,042	63	5,709
	Application Denied	66	601	655	460	178	346	40	2,346
	Denial Rate	55.9%	38.3%	28.1%	27.8%	20.1%	24.9%	38.8%	29.1%
White	Loan Originated	432	8,401	15,065	12,684	9,079	21,591	942	68,194
	Application Denied	394	2,848	2,742	1,911	1,015	1,892	219	11,021
	Denial Rate	47.7%	25.3%	15.4%	13.1%	10.1%	8.1%	18.9%	13.9%
Not Available	Loan Originated	49	737	1,274	1,042	801	1,828	142	5,873
	Application Denied	76	566	558	357	206	401	113	2,277
	Denial Rate	60.8%	43.4%	30.5%	25.5%	20.5%	18.0%	44.3%	27.9%
Not Applicable	Loan Originated	4	13	7	7	2	17	49	99
	Application Denied	4	4	3	2	6	2	1	22
	Denial Rate	50.0%	23.5%	30.0%	22.2%	75.0%	10.5%	2.0%	18.2%
Total	**Loan Originated**	**580**	**11,009**	**19,407**	**16,053**	**11,274**	**26,007**	**1,288**	**85,618**
	Application Denied	**598**	**4,265**	**4,252**	**2,943**	**1,515**	**2,812**	**421**	**16,806**
	Denial Rate	**50.8%**	**27.9%**	**18.0%**	**15.5%**	**11.8%**	**9.8%**	**24.6%**	**16.4%**
Non-Hispanic	Loan Originated	393	7,923	16,144	13,835	9,878	23,117	977	72,267
	Application Denied	379	2,783	3,053	2,208	1,181	2,261	258	12,123
	Denial Rate	49.1%	26.0%	15.9%	13.8%	10.7%	8.9%	20.9%	14.4%
Hispanic	Loan Originated	137	2,315	1,852	1,001	517	758	115	6,695
	Application Denied	128	906	590	320	108	143	47	2,242
	Denial Rate	48.3%	28.1%	24.2%	24.2%	17.3%	15.9%	29.0%	25.1%

Table E.7
Loans by Loan Purpose by HAL Status
City of Oklahoma City
2004–2013 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Home Purchase	Other	9,078	8,911	9,264	8,409	6,720	6,838	6,389	5,923	6,911	7,557	76,000
	HAL	1,514	2,765	2,531	1,153	754	365	82	170	165	119	9,618
	Percent HAL	14.3%	23.7%	21.5%	12.1%	10.1%	5.1%	1.3%	2.8%	2.3%	1.6%	11.2%
Home Improvement	Other	1,797	1,905	1,831	1,837	1,459	1,265	1,376	1,380	1,548	1,882	16,280
	HAL	396	475	495	428	288	230	93	58	63	65	2,591
	Percent HAL	18.1%	20.0%	21.3%	18.9%	16.5%	15.4%	6.3%	4.0%	3.9%	3.3%	13.7%
Refinancing	Other	7,596	5,305	4,232	4,082	4,230	8,736	7,556	6,997	9,080	6,375	64,189
	HAL	2,482	2,686	2,580	1,628	1,052	690	145	128	128	87	11,606
	Percent HAL	24.6%	33.6%	37.9%	28.5%	19.9%	7.3%	1.9%	1.8%	1.4%	1.3%	15.3%
Total	**Other**	**18,471**	**16,121**	**15,327**	**14,328**	**12,409**	**16,839**	**15,321**	**14,300**	**17,539**	**15,814**	**156,469**
	HAL	**4,392**	**5,926**	**5,606**	**3,209**	**2,094**	**1,285**	**320**	**356**	**356**	**271**	**23,815**
	Percent HAL	**19.2%**	**26.9%**	**26.8%**	**18.3%**	**14.4%**	**7.1%**	**2.0%**	**2.4%**	**2.0%**	**2.0%**	**13.2%**

Table E.8
Loans by HAL Status by Race/Ethnicity of Borrower
City of Oklahoma City
2004–2013 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
American Indian	Other	190	156	187	192	135	187	153	157	214	272	1,843
	HAL	51	55	83	27	12	7	4	6	5	2	252
	Percent HAL	21.2%	26.1%	30.7%	12.3%	8.2%	3.6%	2.5%	3.7%	2.3%	.7%	12.0%
Asian	Other	415	391	428	342	282	285	268	246	329	331	3,317
	HAL	62	85	76	41	28	22	2	6	4	5	331
	Percent HAL	13.0%	17.9%	15.1%	10.7%	9.0%	7.2%	.7%	2.4%	1.2%	1.5%	9.1%
Black	Other	554	492	510	421	380	406	409	305	357	359	4,193
	HAL	260	506	477	158	70	25	4	8	5	3	1,516
	Percent HAL	31.9%	50.7%	48.3%	27.3%	15.6%	5.8%	1.0%	2.6%	1.4%	.8%	26.6%
White	Other	7,258	7,393	7,586	6,879	5,517	5,467	5,094	4,770	5,529	6,030	61,523
	HAL	979	1,827	1,684	849	594	296	69	137	138	98	6,671
	Percent HAL	11.9%	19.8%	18.2%	11.0%	9.7%	5.1%	1.3%	2.8%	2.4%	1.6%	9.8%
Not Available	Other	615	470	549	570	401	488	459	440	477	563	5,032
	HAL	160	291	208	78	49	15	3	13	13	11	841
	Percent HAL	20.6%	38.2%	27.5%	12.0%	10.9%	3.0%	.6%	2.9%	2.7%	1.9%	14.3%
Not Applicable	Other	46	9	4	5	5	5	6	5	5	2	92
	HAL	2	1	3	0	1	0	0	0	0	0	7
	Percent HAL	4.2%	10.0%	42.9%	.0%	16.7%	.0%	.0%	.0%	.0%	.0%	7.1%
Total	**Other**	**9,078**	**8,911**	**9,264**	**8,409**	**6,720**	**6,838**	**6,389**	**5,923**	**6,911**	**7,557**	**76,000**
	HAL	**1,514**	**2,765**	**2,531**	**1,153**	**754**	**365**	**82**	**170**	**165**	**119**	**9,618**
	Percent HAL	**14.3%**	**23.7%**	**21.5%**	**12.1%**	**10.1%**	**5.1%**	**1.3%**	**2.8%**	**2.3%**	**1.6%**	**11.2%**
Non -Hispanic	Other	7,010	7,787	7,947	7,223	5,903	5,973	5,425	5,070	6,012	6,565	64,915
	HAL	1,126	2,104	1,921	917	618	303	67	133	89	74	7,352
	Percent HAL	13.8%	21.3%	19.5%	11.3%	9.5%	4.8%	1.2%	2.6%	1.5%	1.1%	10.2%
Hispanic	Other	623	573	765	638	446	398	496	426	431	464	5,260
	HAL	201	403	415	178	93	44	12	23	33	33	1,435
	Percent HAL	24.4%	41.3%	35.2%	21.8%	17.3%	10.0%	2.4%	5.1%	7.1%	6.6%	21.4%

Table E.9
Rates of HALs by Income of Borrower
City of Oklahoma City
2004–2013 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Average
$15,000 or Below	13.9%	28.9%	16.2%	19.0%	11.4%	8.9%	2.1%	13.3%	5.9%	.0%	15.0%
$15,001–$30,000	17.9%	29.7%	28.5%	18.4%	18.2%	7.6%	1.5%	6.8%	5.8%	3.1%	17.0%
$30,001–$45,000	17.0%	27.2%	22.5%	12.6%	11.5%	5.2%	1.5%	3.1%	3.9%	2.6%	12.9%
$45,001 -$60,000	15.8%	26.4%	24.9%	12.1%	9.8%	4.2%	1.5%	2.8%	2.6%	1.8%	12.5%
$60,001–$75,000	14.1%	20.8%	19.9%	10.8%	8.5%	3.9%	1.0%	2.1%	1.9%	.8%	9.9%
Above $75,000	8.3%	16.5%	15.2%	8.6%	6.8%	4.7%	.9%	1.5%	.7%	1.0%	7.0%
Data Missing	9.4%	20.1%	28.3%	28.6%	17.4%	4.0%	2.1%	.0%	2.3%	.0%	16.8%
Average	**14.3%**	**23.7%**	**21.5%**	**12.1%**	**10.1%**	**5.1%**	**1.3%**	**2.8%**	**2.3%**	**1.6%**	**11.2%**

Table E.10
Loans by HAL Status by Income of Borrower
City of Oklahoma City
2004–2013 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
$15,000 or Below	Other	99	69	88	51	31	41	46	26	16	26	493
	HAL	16	28	17	12	4	4	1	4	1	0	87
	Percent HAL	13.9%	28.9%	16.2%	19.0%	11.4%	8.9%	2.1%	13.3%	5.9%	.0%	15.0%
$15,001 –$30,000	Other	1,504	1,220	1,155	990	672	942	848	662	620	526	9,139
	HAL	328	515	460	223	150	78	13	48	38	17	1,870
	Percent HAL	17.9%	29.7%	28.5%	18.4%	18.2%	7.6%	1.5%	6.8%	5.8%	3.1%	17.0%
$30,001 –$45,000	Other	2,080	2,030	2,088	1,894	1,542	1,754	1,516	1,207	1,350	1,433	16,894
	HAL	426	758	605	273	201	96	23	38	55	38	2,513
	Percent HAL	17.0%	27.2%	22.5%	12.6%	11.5%	5.2%	1.5%	3.1%	3.9%	2.6%	12.9%
$45,001 –$60,000	Other	1,666	1,706	1,690	1,538	1,322	1,310	1,113	1,107	1,253	1,345	14,050
	HAL	312	611	561	211	143	58	17	32	34	24	2,003
	Percent HAL	15.8%	26.4%	24.9%	12.1%	9.8%	4.2%	1.5%	2.8%	2.6%	1.8%	12.5%
$60,001 –$75,000	Other	1,238	1,157	1,237	1,120	891	870	812	780	949	1,100	10,154
	HAL	204	303	307	136	83	35	8	17	18	9	1,120
	Percent HAL	14.1%	20.8%	19.9%	10.8%	8.5%	3.9%	1.0%	2.1%	1.9%	.8%	9.9%
Above $75,000	Other	2,299	2,498	2,806	2,711	2,205	1,849	2,008	2,080	2,681	3,061	24,198
	HAL	208	492	502	256	161	91	19	31	18	31	1,809
	Percent HAL	8.3%	16.5%	15.2%	8.6%	6.8%	4.7%	.9%	1.5%	.7%	1.0%	7.0%
Data Missing	Other	192	231	200	105	57	72	46	61	42	66	1,072
	HAL	20	58	79	42	12	3	1	0	1	0	216
	Percent HAL	9.4%	20.1%	28.3%	28.6%	17.4%	4.0%	2.1%	.0%	2.3%	.0%	16.8%
Total	**Other**	**9,078**	**8,911**	**9,264**	**8,409**	**6,720**	**6,838**	**6,389**	**5,923**	**6,911**	**7,557**	**76,000**
	HAL	**1,514**	**2,765**	**2,531**	**1,153**	**754**	**365**	**82**	**170**	**165**	**119**	**9,618**
	Percent HAL	**14.3%**	**23.7%**	**21.5%**	**12.1%**	**10.1%**	**5.1%**	**1.3%**	**2.8%**	**2.3%**	**1.6%**	**11.2%**